Rethinking Community-Building

Rebuilding Communities...

...Rebuilding Lives

FY 2005 Moving To Work Annual Plan

Board Approved June 16, 2004
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EXECUTIVE SUMMARY

Based upon its work since 1994, Atlanta Housing Authority (AHA) has concluded that it is critical and important to cease concentrating families in poverty. The social, financial and human costs to families, the City of Atlanta and the society have been devastating. AHA believes that the better solution is to provide affordable housing seamlessly in market-rate, mixed-income communities. AHA’s focus in the future will be on facilitating or creating housing opportunities that integrate all of the families assisted with AHA subsidies into mainstream, market-oriented residential environments.

Since 1994, AHA has repositioned nine distressed public housing communities with over 5,000 apartments and is replacing them with 7,018 new mixed-income multi-family apartments in 14 market rate, mixed-income communities with a seamless affordable component. AHA has also been working with landlords in low poverty neighborhoods to facilitate opportunities for families with Housing Choice Vouchers. Today 63% of families in the Housing Choice Voucher Program are living in low poverty neighborhoods. Since 2002, AHA has competitively solicited proposals from private sector developers for Project-Based Section 8 Vouchers. Since April 10, 2001, AHA has committed Project-Based assistance for 1,580 multi-family apartments in 22 communities. More than 60% of these units will be in newly developed market rate, mixed-income communities. Independent studies of AHA’s revitalization initiatives have demonstrated that low-income families fare better in mixed-income environments. These communities offer better quality housing and amenities and access to better education and employment opportunities.

AHA has learned that until a community is healthy and hopeful, no amount of social intervention has been or can be effective at the level and scale that the problems demand. Simply put, “Environment Matters!”

AHA has also learned after eight years of outsourcing the management of its properties to professional, private management companies, the properties can be well managed. However, AHA has also learned professional property management cannot overcome the social dysfunction and challenge of concentrated poverty. The reality is that better and more effective property management helps, but does not address the core problem. Tragically, although the conventional public housing properties are managed more effectively, high rates of crime persist, participation in the work force remains very low, approximately 32% (compared with 66.7% for the State of Georgia as of April 2004\(^1\)) average annual income is well below the poverty level, approximately $7,500; 94% of the public housing assisted families in conventional public housing communities earn less than $10,000 annually; and most of the elementary schools that serve conventional public housing communities are low performing or failing. The cycle must be broken.

AHA intends to use the regulatory flexibility under Moving to Work (MTW) to facilitate and/or create housing opportunities seamlessly inside of market rate, mixed income communities or economically stable neighborhoods. AHA will make policy changes that support the success of this strategy with focus on tapping into the human potential of families and the development potential of the real estate and the surrounding neighborhoods.

\(^1\) Georgia Department of Labor, Labor Force Participation Rate, April 2004.
Set forth below are summaries of the four demonstrations under AHA’s MTW Plan:

**Demonstration Number 1: Transform All Public Housing Assisted Communities to Market Rate, Mixed-income Communities.**

During the last nine years, AHA has developed a seamless affordable housing delivery model in market rate communities, owned by public/private partnerships. This model has been embraced and accepted by the City of Atlanta, the families, and the neighborhoods. This model has also been accepted by investors, private sector developers, financial institutions and the United States Department of Housing and Urban Development (HUD). Most importantly, the documented outcomes and improvement in the lives of the families and the impact on the neighborhoods and the City of Atlanta have been outstanding.

AHA’s “Moving to Work” Plan will be focused on transforming all of AHA’s conventional public housing assisted communities into market rate, mixed-income communities. AHA expects to leverage the mixed-income, mixed-finance model implemented through its successful Olympic Legacy Program to create other models for development using the “lessons learned” during the past nine years. AHA intends to illustrate to HUD and to Congress that with legal and regulatory flexibility, serving income eligible families in healthy mixed-income communities is more cost effective and efficient, with substantially better outcomes for families, neighborhoods and society. More importantly, as a direct result of repositioning of the properties and with time, AHA believes the social and behavioral costs of isolating families in concentrated poverty can be mitigated, and perhaps eliminated.

**Demonstration Number 2: Use Housing Choice Vouchers to Provide Income-Eligible Families with Access to Communities of Opportunity.**

AHA supports Congress in its belief that families using federal housing subsidies must not move from “vertical ghettos” to “horizontal ghettos.” AHA believes that with more legal and regulatory flexibility, income eligible families can use vouchers to live in mixed-income, market rate communities. Based on its experience during the last two years, AHA further believes that by using the Project-Based Vouchers as a development tool, AHA can support the development of mixed-income communities and provide more and better housing opportunities. AHA will demonstrate to HUD and to Congress that with legal and regulatory flexibility, the stated goals and outcomes articulated in the Gautreaux Program can be accomplished. The focus in Atlanta, however, will be on income diversity rather than racial diversity which AHA believes will occur over a longer horizon.
Demonstration Number 3: Provide Appropriate and Affordable Housing for Seniors and Persons with Disabilities.

AHA also expects to develop, in partnership with the private sector, an approach to solve the problem of mixing seniors and the young disabled. A principal goal will be to facilitate separate housing environments in which the elderly and young disabled persons can live independently for as long as is feasible. In conjunction with Demonstration Numbers 1 and 2, AHA will partner with its private sector development partners and professional supportive services providers to develop “affordable assisted living.” AHA intends to demonstrate to HUD and Congress, that with legal and regulatory flexibility, seniors and young disabled persons can be housed in separate (in most cases) appropriate independent living environments. AHA believes that financial resources for supportive services must be made available and the community should be developed on a scale consistent with the challenge.

Demonstration Number 4: Implement Policies that Support Building Healthy Communities.

AHA believes that until the community is healthy and hopeful, no amount of social intervention has been or can be effective at a level and scale that the problems demand. Simply put, “Environment matters!” In conjunction with and as a critical part of the strategies to (a) transform the conventional public housing assisted communities and (b) continue to improve the quality of housing supported by Housing Choice Vouchers, policies will be developed and implemented that require non-senior, able-bodied persons to work, and pay their “fair share” of rent. Other policy changes will be adopted that support Demonstration numbers 1, 2 and 3.
Atlanta’s History - Two Decades of Abandonment

Since World War II, few major urban places in America have experienced greater volatility in their demographics and economics than Atlanta, both the City and the surrounding region. Until the 1970’s, with only a single exception of the 1930’s, both had realized steady growth in all of the preceding decades of the 20th Century. By 1970, 1.7 million people were living in the region, with approximately 30 percent residing within in the City and another third settling along its bordering counties, while the remainder was scattered widely across the remaining, mostly rural, three counties. It was a time when most jobs, especially in banking institutions, real estate investment firms, professional, health, education, entertainment and personal services, as well as those working in wholesale and retail outlets, were concentrated in the City. Racially, the City was divided almost equally between African-Americans and whites.

Almost unexpectedly, radical changes in almost all of these historic trends characterized the next two decades. The region’s 1.7 million population literally exploded, adding almost 1.3 million more people during the next 20 years, an increase of over 75 percent. At the same time, the City’s growth turned in the opposite direction, experiencing one of the largest numerical losses of any place its size within the country. Its population during those two decades fell from 495,000 residents to 425,000 in 1980, and then to 394,000 residents in 1990. No other region in the country experienced such a diversion in its demographic trends: a central city losing approximately 100,000 of its residents during the 20 years while situated within a region which gained almost 1.3 million people.2

Atlanta’s employment and tax base plummeted as well. Major businesses, wholesale firms and manufacturing operations, both large and small, relocated to the suburbs, often far outside the City. They were drawn primarily by the easy access created by a newly constructed interstate highway system, by Federal and local lending practices, and by the large, open sites on which to expand, providing jobs for the rapidly expanding population. Retail stores followed this growing population as well.

The City’s tax base suffered considerable losses during this 20 year period. Far fewer funds were available for the repair of streets and parks, schools began to deteriorate, and the number of police and firefighters was sharply reduced. In many parts of the City, the condition of both single-family and multi-family housing as well as the quality of neighborhoods declined. This loss of available public moneys unfortunately coincided with the rising inflation of the 1970’s and the drastic cutbacks in Federal funds for urban rehabilitation in the 1980’s. All of these debilitating trends were occurring at the same time that jobs in the City followed the population to the suburbs.

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While the impact of these trends - declining infrastructure, marginal schools, loss of jobs, poorer City services – affected the entire City, poorer residents, many living in public housing projects, were especially affected. Social and economic services – health, food, welfare, job training, education supplements, child care, and criminal rehabilitation – were all downsized or became more expensive. City assistance in maintaining housing communities were cut back at a time when Federal funds were likewise diminished.

Atlanta Housing Authority

Against this backdrop in the City of Atlanta, the U.S. Department of Housing and Urban Development (HUD) in 1993, designated AHA as a “troubled agency,” based on HUD’s assessment. After decades of mismanagement, AHA was also threatened with being forced into receivership in 1994. In March 1994, The Office of Inspector General of HUD issued a scathing report identifying a number of serious management and performance problems.

CHANGE IN LEADERSHIP

Baseline Assessment of AHA

After a revolving door of executive directors (approximately eight in ten years), Renée Lewis Glover, an established business and corporate finance attorney and the Chair of the Board of Commissioners of Atlanta Housing Authority, was appointed Executive Director in September 1994. Glover resigned from the Board and took on the challenge of re-engineering AHA.

Glover brought on a transition team to assess the true state of the AHA. Glover directed the team to assess the performance of AHA and the conditions of the properties and the families served by AHA. The performance assessment showed AHA had more than 5,000 vacant apartments, most of which were uninhabitable; more than 12,000 backlogged work orders; uncollected rent exceeded 25%; 60-day averages to complete routine work orders; substandard living conditions; high levels of customer dissatisfaction; hundreds of audit findings; a completely mismanaged Section 8 program; a bloated and untrained employee force of approximately 1,300, most of whom were totally demoralized; and a number of long-standing class action lawsuits related to operational breakdowns.

An assessment of the families served by AHA showed an equally bleak picture. With average annual incomes of approximately $6,000, failing neighborhood schools and a culture of hopelessness, families had been institutionalized into poverty, some having lived in AHA-owned properties over multiple generations. Most households were headed by single
mothers, and high rates of unemployment, teenage pregnancy, truancy and a high percentage of high school dropouts predominated.

The federal law, rules and regulations and the local policies governing the public housing program and its management by AHA had failed these families, their neighborhoods and the City of Atlanta.

Charting a New Direction

In the winter of 1994, Glover and her transition team recommended to AHA's Board of Commissioners that the agency move dramatically in a new direction and abandon the failed strategies of the past. The Board agreed. AHA was determined to fix the problems rather than react to symptoms. AHA's new direction was charted by the following strategies: (A) restore integrity, accountability and responsibility; (B) implement private-sector solutions with private-sector partners; and (C) stop warehousing and ghettoizing poor families. AHA determined that if it could not be an asset to the community, it should not operate the program.

A. Restore integrity, accountability and responsibility.

1. AHA was re-engineered to become a well-managed, diversified real estate company with a public mission and purpose. By so defining its business, AHA was able to hire the right personnel with the right core competencies; adopt appropriate policies and procedures; design a business plan; and design and implement results-oriented systems.

2. AHA's infrastructure - its financial, accounting, internal control, contracting, procurement, and information systems - was likewise re-engineered.

3. AHA hired the most capable and experienced people, most of whom had private-sector backgrounds in the real estate industry, to move the agency away from a process orientation to a focus on outcomes and results.

4. AHA resolved its audit findings and instituted systems to insure compliance and irreproachable business practices moving forward.

5. AHA overhauled the Section 8 Program to improve operations, utilization and customer service.
B. Implement policies, procedures and operating methodologies using best practices from the private sector. Use public/private partnerships to strategically solve problems.

1. Using the model for a well-managed, diversified real estate company, AHA decentralized operations and service delivery commencing in the fall of 1995.

2. In April 1996, AHA began to outsource various functions with the goal of improved operations, service delivery, operating efficiency and customer service.

   a. By July 1, 2001, 100% of AHA's conventional properties were managed by professional private management companies. These firms handle all of the day-to-day management and capital improvements at the properties.

   b. AHA’s Design and Construction Department is managed by a professional construction management firm. This has enabled AHA to focus on managing and overseeing all capital work, insuring that all projects are completed on time and within budget, in accordance with HUD rules and regulations.

   c. AHA’s public affairs, community relations and media functions are managed by a professional firm.

3. Currently, all of AHA's real estate development is through public/private partnerships.

C. Stop warehousing and ghettoizing families.

1. Envisioning, planning and creating healthy, economically sustainable communities that benefit the families, the neighborhoods and the City of Atlanta.

2. Improving the sociology of its communities through thoughtful planning.

3. Creating true mixed-income communities.

4. Raising standards of personal responsibility.

5. Raising standards of screening and lease enforcement.

6. Eliminating the stigma of public housing and restoring dignity to the program and the families it serves.
D. Initiate other strategic changes.

1. Beginning in the spring of 1995, AHA overhauled its policies to support the above-described changes in strategic direction. For example, in response to changes in federal regulations in 1995 and 1996, AHA revised the screening criteria to eliminate the criminal element from its communities and adopted local preferences for administering its waiting list to give preference to seniors, the disabled and working families.

2. AHA began developing its asset management infrastructure in the summer of 1996 in order to (a) provide strategic guidance and oversight to the private management companies; (b) provide strategic input to and collaboration with its development partners; and (c) execute oversight and compliance with respect to the various investments and obligations comprising the AHA-sponsored mixed income, mixed-finance properties.

As a result of the new direction and implementing of new strategies, AHA and its customers began to experience dramatic improvements. Since the June 30, 1998 HUD performance assessment, AHA has been designated a high-performing agency, and that designation continues. All outstanding HUD and Inspector General audit findings have been cleared, and since 1998, AHA's financial statements have received unqualified audit opinions. Reengineered systems, processes and procedures have been implemented and are in place. Under Glover's leadership, AHA has positioned itself to become a well-managed diversified real estate company, with a public mission and purpose.

CREATING MARKET RATE, MIXED-INCOME COMMUNITIES

AHA initiated its strategic development program with the revitalization of Techwood/Clark Howell under the 1993 Urban Revitalization Demonstration (URD) Program, predecessor to the current HOPE VI Program. As a demonstration program, the 1993 URD Grant Agreement provided a regulatory platform that encouraged and rewarded creativity.

Revitalization of Techwood/Clark Howell

AHA received a 1993 HOPE VI Revitalization Grant for the revitalization of the Techwood/Clark Howell communities. The vision of the Urban Revitalization Demonstration Program (URD), as articulated by Senator Barbara Mikulski and former Secretary Henry Cisneros, was to challenge large housing authorities to think outside of the box, throw away the rulebook and to come back with a new way of housing low income families inside of vibrant, healthy communities that blended into the surrounding neighborhood. The evidence was overwhelmingly clear that the blight of large, distressed public housing communities on neighborhoods and cities and - most importantly - families was so great that it could no longer be tolerated.
As part of AHA’s strategic agenda to cease warehousing and ghettoizing families, AHA seized the challenge and in the Fall of 1994 solicited a private-sector development partner to assist in creating a new vision for delivering the public housing resource. AHA determined that the new paradigm must meet the following goals:

1. People-Oriented Goals - Mainstream families and end the stigma of public housing assistance. Create human rebuilding programs focused on jobs, job training, education, recreational opportunities for youth, and building strong families.

2. Financial Goals - Leverage federal dollars to provide market caliber housing. Create an income stream for AHA to end its dependency on the federal government and ensure long-term financial sustainability.

3. Overarching Goal - All revitalization must be an asset to the community and the larger neighborhood. This was AHA's goal and HUD's stated goal for the HOPE VI program generally.

AHA's Request for Proposal (RFP) for a program manager and development partner stated that AHA intended to demolish the Techwood/Clark Howell communities with the vision and intent of creating a mixed-income community that provided housing in a wholesome environment. As a result of the RFP process, AHA selected The Integral Partnership of Atlanta (TIPA). TIPA is a joint venture of McCormack Baron, a St. Louis-based, for-profit real estate firm (McCormack) and The Integral Group, an Atlanta based, for-profit real estate firm (Integral). This selection proved to be critical because both firms had a wealth of experience providing affordable housing and working with the various financing tools needed to make the real estate transaction work. McCormack had developed residential communities, mixing Section 8 vouchers with conventional debt. The principals at Integral had developed affordable residential properties and were committed to urban revitalization. Equally important, both McCormack and Integral had the heart for a human transformation effort.

The Mixed-Income, Mixed-Finance Model

There had never been a mixed-income, mixed-finance community, with public housing as a component, before the revitalization of Techwood/Clark Howell and the creation of Centennial Place on March 1, 1996. Before March 1996, all public housing was owned 100% by local housing authorities (LHAs). The underlying assumption was that 100% ownership by the LHA was necessary to protect the families and the resource. The other assumption (albeit unspoken) was that the socialization of the families who had lived in many of the distressed communities was so poor that no one who had a choice would want public housing families as their neighbors. HUD's Office of General Counsel (OGC) had prepared a memorandum (OGC Memorandum), which identified the issues that needed to be addressed if public-housing assisted units were owned by an entity other than an LHA. The issues raised in the OGC Memorandum had to be addressed to the satisfaction of the HUD officials in order to create the legal, financial and regulatory model for a mixed-income, mixed-finance community, with public housing as a component.
Centennial Place is a privately owned (by a public/private partnership with the private sector development partner as the managing general partner), market-rate residential community with a long-term affordable component seamlessly inside of it. Forty percent (40%) of the apartments are reserved for public-housing assisted families; twenty percent (20%) of the apartments are reserved for families who qualify under the low-income housing tax credit program; and forty percent (40%) are reserved for families who pay market rents. Families who earn as little as $7,000 a year live next door to families who earn in excess of $100,000. The families live side-by-side in market-quality apartments that are managed to identical high standards. The keys to success in blending families are family-oriented values and consistently applied high standards.

Sixty percent (60%) of the total development budget comes from private resources and forty percent (40%) of the development budget comes from the HOPE VI grant. Because there are debt commitments to lenders and other investors, the discipline of the private market governs the quality of the housing, the financial feasibility of the property and the long-term management and sustainability of the property. The strategy is to build to the high end of the market and provide a quality product, rich with amenities and customer service, for initially more favorable rents than competitors such as Post Properties and Trammell Crow in order to attract market-rate families. The market rate families ultimately drive the long-term success of a mixed-income residential development, because disposable income dictates the level and quality of services (government and other), retail development, and community sustainability.

Equally important to the long-term sustainability of Centennial Place, as a market rate, mixed-income community, is the sociology of the community and the quality of life infrastructure: neighborhood schools, especially elementary schools and early childhood development; childcare; recreational facilities and other community building resources; retail and commercial uses; and access to public transportation. All of these amenities must speak to and meet the needs of all of the community families, regardless of income.

Education and Community Building Strategy

As Dr. Norman Johnson, former Assistant to the President of the Georgia Institute of Technology (Georgia Tech) and a former member of the Atlanta School Board, once observed, not a single child (black or white) from Techwood/Clark Howell Homes during its entire 60 year history had ever crossed the street to attend Georgia Tech. Dr. Johnson recommended to TIPA and to AHA that in order to be successful, a high performing public elementary school must be at the center of the new community. Because AHA had committed itself to building communities – not just rental properties – AHA and TIPA recognized that it was essential to have a high performing elementary school as part of the master plan for the revitalization of Techwood/Clark Howell. In our shared vision, one measure of success would be when the well prepared students of Centennial Place went on to study at Georgia Tech as a matter of course.

Dr. Johnson and other school board members committed the Board of Atlanta Public Schools (APS), working with Georgia Tech and Coca-Cola - whose world headquarters was across the street from Techwood/Clark Howell - to create a world-
class school, Centennial Place Elementary. Another major stakeholder, the YMCA of Metropolitan Atlanta, whose original home office had been located near the site, expressed an interest in being part of the community and promoting family building under the master plan. The YMCA raised all of the capital needed to develop and build a state-of-the-art facility, the Centennial Place Family YMCA, to serve all of the families in the Centennial Place community. Sheltering Arms, a premium child care provider, developed and operates a first class child development facility so that the families living in the community, some of whom were entering the work force for the first time, had reliable, accessible, affordable and excellent daycare in their own neighborhood.

Ownership Structure

AHA continues to own the fee interest in the land on which the mixed-income multi-family housing is situated. AHA entered into a long-term ground lease with the development partnership. This partnership is a venture among an AHA affiliate, the private-sector development partner and the investors in the low-income housing tax credits. In all cases, the private-sector development partner is the managing general partner. The development partnership develops all of the improvements, and the community is managed by an affiliated property manager or a third party fee management company.

The percentage of market-rate units, tax-credit units and units reserved for public housing assisted families is driven by financial feasibility and underwriting, market studies and the commitments for affordable housing made to the families affected by the revitalization. At the end of the term of the ground lease, ownership of all the multi-family residential improvements reverts to AHA.

Financial Structure for Centennial Place

The challenge of the mixed-income, mixed-finance model is to create a financial structure that allows families earning well below 30% of the metropolitan area median income to afford the rents without diminishing the quality of construction or the long term financial viability of the community. Thus, multiple financing tools must be used. Public housing development funds pay the costs that have no financial return on investment: relocation, demolition, environmental remediation, site preparation and a substantial portion of the hard costs for developing the public-housing assisted units.

The development budget for Centennial Place was comprised of proceeds from a FHA insured 221 (d)(4) first mortgage loan, proceeds from the sale of 9% low-income housing tax credits and a soft second loan of the HOPE VI funds and a small grant of HOPE VI funds.

To assure the rent affordability for families earning less than 30% of the metropolitan area median income, Section 9 operating subsidy is provided by AHA. AHA has agreed with TIPA that the public housing assisted apartments will be operated on a break even basis, i.e. rents collected and subsidy must cover the operating costs. No net operating income is
generated on the public-housing assisted apartments. AHA and TIPA earned a development fee and participate in the net operating income from the non-public housing assisted apartments. Tax-credit investors participate in a preferred return. The property is managed by an affiliate of TIPA.

**Local Support**

The City of Atlanta contributed $11 million to pay the cost of public improvement work in the public right of way. The City and Fulton County agreed to provide tax relief to the property during the first ten years through housing enterprise zone designations and tax relief for the public housing assisted apartments for the life of the property.

**Total Leverage**

The $42.5 million 1993 URD Grant for the revitalization of Techwood/Clark Howell leveraged to date a total of $120 million in new investment, with planned collateral investment estimated at $472 million within a one-mile radius of Centennial Place.

**School Improvement**

During the 2002-2003 school year, Centennial Place Elementary School, based on the Georgia Criterion-Referenced Test for reading and mathematics, earned the second highest score of all elementary schools in the City of Atlanta (both Title 1 and non-Title 1 schools), with 97% of fourth grade students meeting or exceeding grade level performance in reading and 93% of these students meeting or exceeding grade level performance in mathematics. These scores were achieved while approximately 60% of the students remain eligible for free or reduced lunch.³

**CREATION OF THE OLYMPIC LEGACY PROGRAM**

**Leveraging the Learning**

The legal and financial model created through the revitalization of Techwood/Clark Howell has been leveraged by AHA to envision and create, in May 1996, its strategic comprehensive development program (the Olympic Legacy Program). The Olympic Legacy Program is based on the lessons learned, the legal and financial model for mixed-income, mixed-finance communities and the successes, all resulting from the revitalization of the Techwood/Clark Howell communities. AHA also leveraged the excitement, the political and corporate will and the timing of the Centennial Olympic Games to serve as the catalyst for fast tracking the revitalization of five of Atlanta’s most notorious and distressed public housing developments.
and transforming them into wonderfully vibrant and healthy mixed-income communities.

The Olympic Legacy Program communities initially included Techwood Homes, Clark Howell Homes, East Lake Meadows, John Hope Homes and John Eagan Homes - an aggregate of approximately 3,000 units - with the goal of transforming these distressed properties into market rate, mixed-income communities. While these revitalizations used the legal and financial model created under the 1993 Techwood/Clark Howell HOPE VI Revitalization Grant, they were financed with non-HOPE VI funds, including Comprehensive Improvements Assistance Program (CIAP) funds, public housing development funds and Major Reconstruction of Obsolete Projects (MROP) funds. Appropriate statutory changes were needed, however, because by law these funds could only be used for renovation. Today, the Olympic Legacy Program has been expanded to include the revitalization of five additional large and distressed public housing communities -- Kimberly Courts (300 units), Carver Homes (990 units), Perry Homes (944 units), Harris Homes (510 units) and Capitol Homes (694 units). Additional properties have been added as HUD funding has become available to AHA.

**Leveraging the HUD Funds**

With the current AHA-sponsored neighborhood revitalization work funded and underway, the AHA, through the Olympic Legacy Program, is leveraging approximately $300 million of various public housing development funds into over $2.0 billion of new investment in historically disinvested neighborhoods. The impact on families, communities, neighborhoods and the City of Atlanta has been outstanding.

**Status of the Olympic Legacy Program**

Since the creation of the HOPE VI program, AHA has been at the forefront of the national effort to transform public housing. To date, AHA has sponsored and completed construction of 3,848 mixed-income apartments in 14 new market rate, mixed income communities. In addition to the completed work, approximately 478 mixed-income units are currently under construction and approximately 2,692 additional mixed-income rental units and 972 for sale homes are planned for completion by 2009. Upon completion of currently funded revitalization initiatives, AHA will have sponsored the development of over 7,018 mixed-income multi-family residential apartments, of which approximately 62% will be affordable including 38% reserved for families eligible for public housing assistance. An investment leverage of more than one-to-seven will have been achieved, with over $300 million of public housing development funds (including $166 million in HOPE VI funding) producing over $2 billion of new investment in once-distressed neighborhoods.
LESSONS LEARNED

What has AHA learned from its work since September 1994.

The Boston Study. In 2001, AHA commissioned Dr. Thomas D. Boston, Professor of Economics at the Georgia Institute of Technology and President and CEO of the Boston Group, Inc., an Atlanta-based urban planning and research firm, to study independently the impact of AHA’s revitalization program on the quality of life of public housing assisted families. The Boston Study focused on quality of life changes for residents associated with AHA’s revitalization activities and sought to resolve, among other issues, whether the change in environment improved the quality of life of public housing assisted residents. This study was paid for with non-HUD funds. The study has also been subjected to rigorous academic peer review.

For this study, 2,718 families were tracked longitudinally over a seven-year period, between 1995 and 2001. These families all lived in one of six conventional AHA public housing projects in 1995. Three projects were revitalized into mixed-income communities during the examination period and three were not. The housing choices of assisted residents were followed from one housing arrangement to another as properties were demolished and reconstructed. Similarly, the housing choices of residents residing in conventional public housing assisted properties that were not revitalized were also tracked.

The findings from the Boston Study are instructive. The percent of public housing assisted families (ages 16-62) in mixed-income communities whose primary source of income is from labor market earnings for 2001 was 52%, compared with 32% for assisted families living in conventional public housing and 58% for persons residing in housing subsidized by housing choice vouchers. These percentages compare to 67.5% for the State of Georgia. The average household income for assisted families in the mixed-income communities in 2001 was $9,738 compared with $7,317 for families residing in conventional public housing and $9,567 for families residing in housing subsidized by housing choice vouchers.

The percentage of public housing assisted families below the poverty line in mixed-income communities in 2001 was 68%, compared with 84% for families in conventional public housing, and 67% for families residing in housing subsidized by housing choice vouchers. The evidence is clear that in families fare better in mixed-income environments both in the AHA-sponsored market rate, mixed-income communities and through the Housing Choice Voucher Program.4

The Strata Study. In 2002, Strata Real Estate Alliance, LLP was engaged to analyze the economic impact of the revitalization of Techwood/Clark Howell Homes which resulted in the creation of Centennial Place and Perry Homes, which resulted in the creation of West Highlands at Heman E. Perry Boulevard. These studies established a baseline of the economic condition of both of these communities around the following factors: population size; home sales; tax status; and population profile. For both communities, the studies indicated profound disinvestment prior to the announcement of AHA’s

4 See Boston Study Presentation in Appendix A.
intent to revitalize these communities, and the obvious positive impact around all of these factors following the announcement of AHA’s revitalization initiatives.  

**Centennial Place**

With respect to Centennial Place, the Strata study concluded that the revitalization of Techwood/Clark Howell Homes was a significant catalyst for the revitalization of the primary impact area, by removing a stigma from the area and replacing it with an asset that is perceived as safe and contributing. See Appendix A for Strata research executive summary for Centennial Place.

**West Highlands**

With respect to West Highlands, Strata noted the impact of the announcement of the revitalization and forecast increased home sales prices and an increase in the number of housing units sold, accelerated land transactions and increased land prices. See Appendix A for Strata research executive summary for West Highlands.

**SPECIAL NEEDS FOR SENIORS AND PERSONS WITH DISABILITIES**

Though AHA has given much attention to the repositioning of nine of its 25 family communities through its revitalization initiatives, AHA also recognizes the need to improve the quality of housing for seniors and persons with disabilities, many of whom reside in AHA’s 17 high-rise communities. AHA is working proactively to examine the needs of these special populations. The need for this examination is a result of the changing face of AHA’s senior communities. Senior developments that once only housed the elderly are now a complex mix of elderly (frail and independent), near elderly (50 to 61 years of age) and persons with disabilities (both elderly and non-elderly). This mixed population comes with diverse lifestyles and needs which have created a new set of housing issues for AHA to address.

On October 30, 2003, AHA embarked on an important initiative to develop a plan for providing quality affordable housing to meet the interests and needs of seniors and persons with disabilities. The initiative – the Affordable Housing Initiative for Seniors and Persons with Disabilities - established a 30-member community volunteer advisory board to study issues related to housing seniors and disabled persons living in AHA’s high-rise communities, and to develop a plan of action to address issues associated with these special populations. The recommendations provided by this group will support AHA’s long-term strategy to develop communities with the necessary supportive services and community facilities to best address the specialized needs of these populations through public/private partnerships.

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5 See Strata Study Summaries in Appendix A.
**Recommendations of the Advisory Board.** AHA’s Affordable Housing Initiative for Seniors and Persons with Disabilities’ Advisory Board conducted extensive research and studies of seniors and persons with disabilities, examining the issues related to mixed-populations residing in its 17 high-rise developments and identifying areas for enhancement, expansion and collaboration. The advisory board determined that the 17 high-rise communities were outdated in terms of physical attributes for housing seniors and persons with disabilities. Supportive services must be integrated to meet the needs of today’s growing senior population who is living longer, and who desires to age in place. Many of the elderly and disabled persons subsist on average annual incomes of approximately $8,396. The Advisory Board also determined that the population mix between elderly and young disabled in the high-rises, has destroyed the quality of life for both the elderly and disabled. The absence of social services, counseling and nursing services has created a poor living environment, which must be addressed. Researchers agree that elderly and young disabled persons can live together provided that the percentage of disabled persons does not exceed 13.5% and that counseling and other services are provided. Finally, the Advisory Board developed recommendations for AHA to partner with the development community to expand housing choice for these populations including affordable assisted living and supportive housing for the elderly and disabled.

**Other National Research.** Our learnings are supported by report findings from the bipartisan Millennial Housing Commission (MHC) a congressionally appointed commission charged with examining critical housing issues, including the importance of housing, particularly affordable housing which includes housing for the elderly, to the infrastructure of the United States. The MHC report noted that (1) decent, affordable and stable housing created a positive environment for raising children and promoted family stability; (2) neighborhood quality plays an important role in positive outcomes for families; and (3) the revitalization of distressed neighborhoods is one way to support economic independence and individual advancement.6

Similarly, research from the Gautreaux and Moving to Opportunity demonstrations indicates that relocating families to better neighborhoods can improve educational, mental health, and behavioral outcomes. The Gautreaux program gave certain Chicago public housing residents special Section 8 rent certificates to be used to pay for private rental apartments in different neighborhoods, including middle income suburban communities. Using these certificates, families were able to move to better labor markets, schools and neighborhoods. One study interviewed residents who moved to the suburban communities and asked how moving helped them obtain jobs. The residents cited the higher number of jobs, the perception of improved physical safety, and the positive role models of seeing other neighbors work. The outcomes of the Gautreaux Program reinforce the concept of “geography of opportunity”, the premise that location affects opportunities and outcomes and that different opportunities come with different environments. AHA believes in the promises of the Gautreaux Program and wants to use MTW to create opportunities through geography.7

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6 A full copy of the report may be found at http://www.mhc.gov/MHCReport.pdf.
IV. Today’s Challenge and Opportunity

Even after AHA has repositioned nine of its 25 traditional public housing family communities and built 14 new mixed-income, mixed-finance communities, more than 13,000 of AHA’s residents still reside in the older public housing projects ridden by the same social problems experienced at the old Techwood/Clark Howell Homes and East Lake Meadows in the early to mid-1990’s. The concentration of impoverished families continues to produce some of the City’s worse areas for social ills and personal attitudes of hopelessness. Most of these remaining public communities are characterized by high crime rates, marginal employment, failing schools, poor health, dysfunctional family structures, and disinvestment in Atlanta neighborhoods. In addition, AHA has 17 high-rise communities housing elderly and disabled families ridden with their own unique set of challenges, such as life-style conflicts, mental illness, and frail and aging seniors lacking appropriate supportive services.

Below are key statistics reflecting the current state of AHA’s conventional public housing assisted family communities as of May 7, 2004, unless otherwise indicated:

♦ The average annual income of families is approximately $7,516.
♦ The average percentage of families earning below 30% of area median income is 94%.
♦ The average unemployment rate for adults excluding the disabled, ages 18-61 is 58.6%.
♦ 2,269 Part 1 violent crimes were committed at AHA’s family public housing assisted communities in 2003, representing just over 10% of Part I Crimes in the City of Atlanta during that period.8
♦ Eight of the 15 elementary schools serving AHA’s remaining conventional public housing assisted family communities ranked among the bottom third of the 1,053 elementary schools in Georgia. On average, only 15.9% of students at the 15 elementary schools serving these communities exceeded standards, compared to the lowest performing school among the top third of Georgia schools where 32.5% of students exceeded standards.9

The following statistics reflect the challenges at AHA high-rise public housing assisted communities as of May 2004 unless otherwise indicated:

♦ The average annual income of families is approximately $8,395.
♦ The average percentage of families earning below 30% of area median income is 94%.
♦ Nine of AHA’s high-rise communities have a population mix where either (a) the number of young disabled

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8 The Federal Bureau of Investigation (FBI) uses an internal classification system to categorize crime. This system categorizes crime into two primary areas: 1) Part I Crimes which include violent crimes such as aggravated assault, arson, burglary, forcible rape, larceny, motor vehicle theft, murder, robbery and theft; and 2) Part II Crimes which include all other crimes such as simple assault, embezzlement, forgery, counterfeiting, disorderly conduct, gambling, prostitution, and public drunkenness.

9 School rankings may be found on Georgia Public Policy Foundation website located at http://reportcard.gppf.org/desktopdefault.aspx?Level=Elementary.
residents exceeds the number of senior residents or (b) the number of young disabled residents is less than the number of senior residents by a margin of 4% or less.

♦ 375 Part 1 and Part 2 crimes were committed at AHA’s high-rise public housing assisted communities in 2003.

Additionally, in AHA’s most recent Physical Needs Assessment of its conventional public housing properties, AHA’s total capital needs exceed $300 million. Given the decreasing rate of capital fund awards (approximately $14 million per year) from HUD, it would take AHA nearly 20 years to accumulate sufficient funding, at current funding levels and assuming no further aging or wear and tear to meet AHA’s current modernization and revitalization needs.

Atlanta’s Resurgence

♦ The City of Atlanta is experiencing a dramatic turnaround. After losing nearly 10,000 persons from the population count in the 1980s and only gaining 1,200 during the 1990s, the City of Atlanta has added more than 16,000 new residents since 2000. The April 21, 2003 population in the Atlanta region was 3,669,300, and nearly 240,000 more than counted in the 2000 Census and 57,700 higher than the region’s 2002 estimate. Metropolitan Atlanta expects to add 2.5 million additional residents by 2030.

♦ Metropolitan Atlanta has led the nation in net new job growth in the last decade, adding nearly 685,000 new jobs. Newsweek magazine ranked Atlanta as the project leader in job creation from 1998-2005 expecting to create 1,800,000 net new jobs by 2030.

♦ The total number of housing units in the City of Atlanta increased from 186,998 in 2000 to 198,306 in 2003, with an average annual change for that period of 3,769 units. Approximately 51% of those units in 2003 were multi-family units.

♦ 9,104 building permits were issued in the City of Atlanta during the 2003 calendar year.

Additionally, several major Atlanta ventures are in the planning stages:

• A 12-route commuter rail system is being planned, with a new terminal located Downtown on property which the City has acquired.

• Plans are underway to construct a 22-mile development corridor on a mostly abandoned rail beltline around the City. It is being designed to attract economic development, create a circumferential urban park system, and link some 50 communities and urban nodes.

• A 30-mile streetcar system, lying within the Peachtree Street corridor, is being proposed to run from West End in the south, through Downtown and Midtown, to Buckhead in the north.

• Downtown Atlanta is enjoying a major renaissance, in large measure a legacy of the Olympic Games. The focus of the new investments has been the Olympic Memorial Park. Adjacent to and north of the park are some 4,000 residential units which have been built, or which are now under construction or announced. Affordable housing units are included as part of some of these projects. In addition, now under construction by the State and facing the park is a $200 million aquarium, a gift of the Bernard Marcus Family Foundation. When completed, this education and tourist attraction will be the second largest in the world.

Given the renewed interest in the City of Atlanta, the concerns created by urban sprawl and traffic congestion, the increasing appeal of in town living, and AHA’s ownership of public housing communities situated on over 380 acres of property in the City of Atlanta, AHA has a unique opportunity to leverage its assets and the above described private development activity to provide excellent affordable housing resources seamlessly inside of market rate, mixed income communities. With MTW comes the regulatory flexibility to unlock our resources, the human potential of families, and the development potential of our real estate.

**Benchmarking Success**

AHA’s community building work will be assessed under the MTW Demonstration Program. During the first ninety days in order to establish a baseline, AHA will cause each of its public housing assisted communities to be assessed using the indices described below. A further assessment will be designed to track the families to measure their success. The repositioned communities will also be assessed by measuring the impact on families and neighborhoods to benchmark success. Dr. Boston proposed that the health and sustainability of a community should be measured by two indices – Family Development Index (FDI) and Neighborhood Development Index (NDI).

The Family Development Index includes the following components:

- **Employment Index** – This index measures the percent of assisted families ages 16 to 62 whose primary source of income is labor market earnings.

- **Poverty Status Index** - This index is simply the percent of assisted families whose total income place them below the poverty line.
♦ **Household Income Index** – This index is the median income of assisted households where the maximum goal post is set equal to the median household income of the City of Atlanta and the minimum goal post is 0.

♦ **Earned Income Index** – This index is the family’s labor market income divided by income from all sources including welfare, social security, etc.

♦ **Income Gap Ratio** – This index is calculated for families who are in poverty. This ratio expresses the percent by which family income must increase in order for the family to no longer be in poverty.

The Neighborhood Development Index is composed of the following measurements:

♦ **Poverty Index** - This index expresses the percent of residents in the immediate neighborhood (i.e. Census Block Group) that are below the poverty line.

♦ **Welfare Dependency Index** - This index measures the percent of households in the neighborhood that are dependent on welfare.

♦ **School Attendance Index** – This index is the percent of the population in the neighborhood (ages 3 to 20) that are currently enrolled in school.

♦ **Employment Index** – This index is the percent of individuals ages 16 and older who are active in the labor market.

♦ **Quality of Employment Index** – This index measures the percent of the employed population that works in managerial and professional occupations.

♦ **School Quality Index** – This index is measured at the primary school level and is the percent of primary students achieving Stage 5 or Stage 6 on the statewide writing assessment examination.

♦ **Home Value Index** – This index measures the median value of homes in the neighborhood and the maximum goal post is the median home value in the City of Atlanta multiplied by a factor of two.

♦ **Racial Diversity Index** – This index is measured by an index of dissimilarity. Specifically, the racial distribution of the neighborhood is benchmarked against the racial distribution of Fulton County.

♦ **Neighborhood Affordability Index** – This index compares the household income of assisted residents to the median rental cost in the neighborhood. Affordability is expressed as the percent of families for whom the median rent is less than one-third of household income.
In addition to the indices used in the Boston Study, AHA may incorporate other measurements in its benchmarking process, including measurements related to resident health, crime, community investment or disinvestment to measure its performance during the demonstration period.
INTRODUCTION OF MTW DEMONSTRATION INITIATIVES

AHA has developed our MTW Plan in consultation with residents, development partners, private management partners, and other key community stakeholders. Our plan takes advantage of market conditions, addresses current challenges, builds upon lessons learned, and leverages public and private partnerships and resources. AHA’s MTW Plan includes four new demonstration initiatives that form the foundation of our approach:

1. Transform All Public Housing Assisted Communities to Market Rate, Mixed-Income Communities.
2. Use Housing Choice Vouchers to Provide Income-Eligible Families with Access to Communities of Opportunity.
3. Provide Appropriate and Affordable Housing for Seniors and Persons with Disabilities.
4. Implement Policies that Support Building Healthy Communities.

Part II of AHA’s MTW Plan describes these demonstrations in greater detail.
PART II: MTW DEMONSTRATION INITIATIVES

During FY 2005, AHA intends to implement four MTW demonstration initiatives that will reflect (1) AHA’s belief that the “mixed-income” model of providing affordable housing is the preferred method of affordable housing delivery, (2) AHA’s desire to appropriately and affordably house seniors and the young disabled in environments that are constructive and supportive, and (3) the evolution of AHA towards becoming a diversified real estate company. Accordingly, AHA’s activities for FY 2005 will be centered on four primary demonstration initiatives:

- **Transforming All Conventional Public Housing Assisted Communities to Market Rate, Mixed-income Communities;**

- **Using the Housing Choice Vouchers to Provide Income-Eligible Families with Access to Communities of Opportunity;**

- **Providing Appropriate and Affordable Housing for Seniors and Persons with Disabilities; and**

- **Implementing Policies that Support Building Healthy Communities.**

Each of these demonstration initiatives is described in more detail in this part of the MTW Plan.

1. **Transforming all Conventional Public Housing Assisted Communities to Market Rate, Mixed-Income Communities.**

AHA and its private sector development partners have enjoyed tremendous success with our revitalization projects under the Olympic Legacy Program, using HOPE VI and other public housing development funds to leverage private resources and other non-HUD public resources. To date, AHA has sponsored and completed construction of 3,848 mixed-income apartments in 14 new mixed-finance communities. In addition to the completed work, approximately 478 mixed-income units are currently under construction and approximately 2,692 additional mixed-income rental units and 972 for sale homes are planned (and funded) for completion by 2009. Upon completion of currently funded revitalization initiatives, AHA will have developed over 7,018 mixed-income rental housing units, of which 63% will be affordable to extremely low, very low, and low-income families. An investment leverage of more than one-to-seven will have been achieved, with over $300 million of public housing development funds (including $166 million in HOPE VI funding) producing over $2 billion of new investment in once-distressed neighborhoods.
HUD, however, has indicated, in light of current federal budget constraints, that it is not recommending that Congress appropriate additional funds for the HOPE VI revitalization program for Federal Fiscal Year 2005 and several years thereafter. AHA is only awarded approximately $14 million per year in capital funds, which amount can not keep pace with the $300 million in aggregate capital and redevelopment needs at the AHA-owned properties. Faced with this challenge and given the physical condition of the properties and the social condition of the families who reside in the properties, AHA must pilot new approaches in financing and supporting the revitalization of its distressed family communities.

As a demonstration program, AHA, in partnership with its private sector development partners, will pilot these new approaches using the flexibility under its MTW Agreement. AHA believes that under this demonstration, legal and financial development models and management models will be created that will reduce dramatically the amount of HUD subsidy, both capital and operating needed to reposition and maintain the affordable resource in market-driven properties.

During the first 90 days of fiscal year 2005, AHA will assess each of its communities, using the Family Development Indices and the Neighborhood Development Indices as the measuring tools to determine the state of the community and whether it is a good candidate for repositioning. AHA will also update the physical needs assessment, conduct a market study to determine the condition of the physical plant and the surrounding neighborhood and review other assessments concerning its communities. On a simultaneous track, AHA intends to develop and release a Request for Proposal inviting private developers to submit proposals that support AHA’s goals to create mixed-use, mixed-income housing opportunities for families living in its remaining conventional public housing communities. Based on a number of factors and conditions as set forth in the Request for Proposal, AHA will accept those proposals that are most favorable to the AHA, the affected families and the surrounding neighborhoods. AHA will also determine if our goals and objectives for the community revitalization and this demonstration are being met, including the long-term financial feasibility and sustainability of the new community.

AHA also intends to work with public and private sector, experienced developers and service providers to support the development of service-enriched housing opportunities for low-income senior and disabled clients. AHA will explore the use of existing public and private sector resources including Medicaid Waivers, Low Income Housing Tax Credits, and DCA Supportive Housing funds. AHA will also pursue funds under the Public Housing Authority Affordable Assisted Living Demonstration Program, an anticipated joint grant program sponsored by HUD and the U.S. Department of Health and Human Services.

AHA is proposing to pilot the Public Housing Reinvestment Initiative conceptually proposed by HUD in its FFY 2002 budget. AHA and its selected private sector development partner would seek to raise capital in the capital markets for each affected community using the rents collected and subsidy provided under the Project-Based Voucher program as the sources of net operating income. These resources together with the land could be further leveraged to attract additional private resources to create a market rate, mixed-income community. AHA will consult with affected communities as we move this initiative
As a part of this initiative, during fiscal year 2005 AHA’s MTW benchmark goal is to convert two of its communities to Project-Based Section 8. AHA expects there will be any number of models that will be explored to achieve the end goal. We believe that given the interest in living in-town in the City of Atlanta and the Atlanta Regional Commission’s projected growth of approximately 2.5 million additional persons by 2030, that AHA’s goal of transforming all of its public housing assisted communities to market rate, mixed income communities is achievable.

2. **Using the Housing Choice Vouchers to Provide Income-Eligible Families with Access to Communities of Opportunity.**

AHA will pilot a program using its Housing Choice Voucher Program in the City of Atlanta using the Lessons Learned from the “Gautreaux Study.” The underlying premise of the Gautreaux Program was that “places affect individuals’ opportunities and life outcomes.” The Gautreaux Program was heavily focused on racial diversity. We believe that similar results can be achieved in Atlanta if we strategically set the policies in our MTW Plan to encourage families to move to economically diverse neighborhoods, where there are better schools, better services, and better employment opportunities.13

During fiscal year 2005, AHA will aggressively identify, and in some cases develop, using Project-Based Vouchers as a development tool working with private sector partners, housing opportunities for income-eligible families in “Communities of Opportunity” in the city of Atlanta and around the metropolitan Atlanta area. As construction or substantial rehabilitation is completed and Project-Based apartments come on-line, AHA will convert tenant-based vouchers to project-based vouchers as needed to meet commitments for Project-Based units, i.e. the turn-over tenant vouchers will “stick” to the Project-Based apartments. Since April 10, 2001, AHA has committed Project-Based assistance for 1,580 multi-family apartments in 22 communities. More than 60% of these units will be in newly developed market rate, mixed-income communities.

During the first 90 days of the 2005 fiscal year, AHA will develop a deconcentration plan that will define and, in some cases, limit absorption of Housing Choice Vouchers in Atlanta’s neighborhoods, with the goal and intent of reducing and ultimately eliminating assisted-housing concentrations of poverty in neighborhoods in the City of Atlanta. AHA will work with other Housing Choice Administrators in Metropolitan Atlanta to facilitate moves in the metropolitan Atlanta area that would provide program participants a greater range of employment and better educational opportunities. Through its Housing Choice Landlord Outreach Program, AHA will also continue its aggressive identification of rental opportunities for families in low poverty areas throughout the city of Atlanta.

3. Providing Appropriate and Affordable Housing for Seniors and Persons with Disabilities

AHA will further explore and implement strategies that immediately address the complex social issues associated with mixing seniors and young disabled individuals in our 17 high-rise communities. AHA has experienced its share of tension between senior and young disabled residents in these communities. Many of AHA’s high-rise communities have a disproportionately high number of young disabled residents. The lifestyles of these young disabled residents often are not compatible with the lifestyles of the seniors. Over the past six months, AHA’s Affordable Housing Initiative for Seniors and Persons with Disabilities’ Advisory Board has studied these issues and conducted research to identify solutions. During these efforts, AHA identified two research studies on mixed-population, state-subsidized housing in Connecticut and Massachusetts, both which further define the problems in mixing these populations and recommend the need to provide separate housing or achieve the “right” ratio when mixing these populations. The Connecticut research is summarized in an academic article by Sheehan and Stelle that researches management problems and other negative incidents in mixed populations of elderly and non-elderly tenants. The Massachusetts research is provided by the Massachusetts Office of Legislative Research reporting on the success of the state’s 1995 “mixed population” law. This study examined the success of the 1995 Massachusetts “mixed-population” law that seeks to limit the number of non-elderly disabled tenants in state funded elderly housing. The mixed population goal established by the law is 86.5% elderly to 13.5% non-elderly disabled tenants. Both research studies are important in highlighting the need for AHA, HUD, and Congress to seek solutions to mixed-population concerns.14

Based upon this research, AHA will immediately facilitate separate and appropriate independent living environments for seniors (i.e. elderly and almost elderly), and young disabled residents. As a first step, AHA will implement an elderly admissions preference and defined population mix percentage of 80% elderly/almost elderly and 20% young disabled for each of the 17 high-rise communities. By designating a community as “percentage based mixed-population” with defined percentages of 80% elderly/almost elderly to 20% young disabled and establishing an elderly/almost elderly admissions preference ratio, AHA’s private management companies would be allowed to admit 4 elderly/almost elderly residents before admitting a young disabled resident. Once a young disabled resident has been admitted, the private management companies would continue to admit 4 more elderly residents on the waiting list for every one young disabled resident until such time as the 4:1 ratio is established. In managing these transitions, AHA’s private management partners will not require existing residents to relocate, though they may be offered vouchers. AHA and its private management partners will implement an aggressive marketing program targeting elderly/almost elderly including those on the Housing Choice Voucher Program waiting list.

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As a part of the first demonstration initiative described earlier, AHA also intends to work with public and private sector, experienced developers and service providers to support the development of service-enriched living opportunities for low-income senior and disabled clients. AHA will explore the use of existing public and private sector resources including Medicaid Waivers, Low Income Housing Tax Credits, and DCA Supportive Housing funds. AHA will also pursue funds under the Public Housing Authority Affordable Assisted Living Demonstration Program. For purposes of this initiative, “elderly” is defined as ages 62 and older, “almost elderly” is defined as ages 55-61 and “young disabled” is defined as under 55.

4. Implementing Policies that Support Building Healthy Communities (Supporting Policy Initiatives)

AHA is committed to ending the warehousing of low-income families and to creating healthy, market rate, mixed-income communities where families can thrive. As previously stated, market rate, mixed-income communities can offer families quality housing, schools, employment opportunities, retail, amenities, and a wider range of choices and opportunities. While AHA believes that this approach is vital to the long-term success for families and neighborhoods, there are important policy changes that must be implemented to ensure the success of a comprehensive community building strategy. Families must take personal responsibility and accept and fulfill their role in this effort. Families must embrace and be held accountable to maintaining the standards of quality set in their new surroundings and must be contributing members in these communities. This means raising the standards of personal responsibility for adults and youth; and this means eliminating the stigma of “public housing” and “public housing resident.”

To support our efforts, AHA will implement new policies which support and advance the three demonstration initiatives described above. These policies will support the transformation of AHA communities into market rate, mixed-income environments with the highest standards of quality and in alignment with private sector standards. Other policies will support AHA’s ability to provide and manage affordable housing resources in market-rate communities by providing guidelines for appropriate deployment and allocation (Resource Management Policy Initiatives).

1. Family Policy Initiatives

AHA’s Family Policy Initiatives will create policies that are aligned with standards set in the private sector. These policies are intended to prepare AHA’s families to live in market rate, mixed-income communities. These policy changes will be consistent for families assisted by both AHA’s Housing Choice and Public Housing Programs, unless otherwise indicated below.

a. Program Requirements

As a condition of receiving and maintaining subsidy, AHA will require all able-bodied 18 to 61 year old adult Head of Household and other adult household members to maintain continuous full-time employment. This work
requirement will be an ongoing, continuous requirement as a condition of receiving and maintaining subsidy assistance. AHA desires that all children are in school full-time; however, where 16 and 17 year old youth may have dropped out of school, AHA will also require these individuals to be employed as a condition of their head of household members receiving and maintaining subsidy assistance. Exemptions from these requirements include clients who are (1) elderly (62 and older) and (2) disabled and unable to work (which means verifiably unable to work due to the disability). For the purpose of this requirement, full-time employment is defined as a minimum of 30 hours per week and may also include self-employment that is verifiable by tax reporting documents or other legal documentation. Individuals, who are full-time students or are enrolled in training programs pursuant to the participation guidelines described below, must also work. In such cases, AHA will require that the combination of school or program participation and work be at least 30 hours per week. In addition, all school and program participation must be approved by AHA or its private management partners.

This employment requirement supersedes HUD's Community Service requirement; therefore, client participation in community service activities will not provide an exemption from the employment requirement. Additionally, AHA will only permit rent relief for residents or clients who are terminated from employment because of circumstances beyond their control. Residents or clients who become unemployed for any reason will be required to obtain employment within 60 days of the first date of unemployment, unless one of the other exemptions apply.

To assist residents in their efforts to comply with the work requirement, AHA will identify community resources that provide links to employment, training, and social services. Given the limited amount of funding that AHA receives from HUD for supportive services, it is impractical for AHA to establish client services programs without requiring full program participation by clients. Currently AHA has invested just over $9.2 million to provide coaching and counseling services to affected families of its HOPE VI communities. In order to ensure that these precious resources are not wasted, AHA directly or through its representatives or agents may refer residents or Housing Choice participants, based on a needs assessment, employment status or other circumstances, to certain Economic Independence programs such as assessment services, coaching, counseling and referral services, and the Good Neighbor Program (a program designed by AHA to educate clients on issues related to living in market rate, mixed-income communities, renting from private landlords, and living in single-family neighborhood settings). If referred, clients will be required to attend and actively participate as a condition of receiving and maintaining subsidy. Full participation will be deemed as fully and satisfactorily meeting program terms and requirements including any attendance, participation, progress, and completion requirements. AHA will limit the number of times that each affected client may use participation in an AHA-approved training program as a partial exemption from the full-time work requirement to a maximum of three times during their tenure in the subsidy program, including any GED (General Education Diploma). In the event that GED services are required by a client, AHA will limit participation in GED to one of the three times for no longer than 18 months unless otherwise approved by AHA. AHA will hold each client accountable to fully participate in AHA-approved family self-sufficiency programs to which
AHA or its agents may refer them. And lastly, AHA will coordinate these program requirements with the program requirements of the local Temporary Assistance for Needy Family (TANF) program. AHA clients who participate in TANF must comply with TANF requirements as a condition of receiving and maintaining their AHA subsidy assistance. Also, AHA will work with Fulton County Department of Family and Children Services (DFCS) to incorporate learnings from welfare reform.

b. Individual Development Accounts (IDAs)

Under the Public Housing Program, AHA will eliminate the existing income disregard allowances and replace them with Individual Development Accounts (IDA) for clients who are 18 to 61 years of age and meet the work requirement described earlier. It has been AHA's observation that the income disregards provide families a short-term income increase to which most families tend to adjust their living expenses only to find themselves in a worse financial situation by the end of the income disregard period. AHA will hold a portion of residents' rent as a carrying charge in an IDA account for their benefit. AHA desires to establish a savings plan that will serve as an incentive and reward to families who advance themselves successfully off of subsidized housing. It is AHA's intention that the IDA program will provide clients with the opportunity to accumulate financial resources to support their transition off of subsidy assistance. The IDA Program will be based on eligible low-income families participating in an AHA-approved Economic Independence program, obtaining and retaining employment, and meeting other benchmarks and criteria to be established by AHA. Residents may use the IDA account funds for homeownership, education, or emergencies approved by AHA. AHA will identify community partners that provide capacity-building programs and possibly matching funds for the IDA Program. AHA will establish an aggressive education strategy as part of this initiative to ensure that residents take advantage of the IDA program. IDAs will not apply to elderly and disabled (i.e. who are verifiably unable to work) clients who are on fixed government entitlement incomes. The current income disregard will remain in place until the IDA Program is implemented April 1, 2005.

c. Clean and Safe Environment Requirement

AHA will enforce higher health and safety standards in how residents and Housing Choice program participants maintain their housing units. We recognize that the maintenance and upkeep of housing units has a direct effect on the health and safety of families and their neighbors. For example, poor maintenance and upkeep of housing units can create fire hazards and endanger the lives of families and their neighbors. Violations such as disabling carbon monoxide and smoke detectors, tampering with electrical or other wiring, improper use of appliances (e.g. placing clothing and other objects on top of equipment and appliances which are not intended to hold such objects), and failing to clean stoves and other appliances so that the appliances malfunction, will not be tolerated. Beginning fiscal year 2005, AHA will implement more aggressive enforcement of higher standards among residents and Housing Choice Program participants. Under MTW, AHA will make meeting these higher standards a requirement.
of families receiving and maintaining their vouchers. AHA will enforce these standards in partnership with its
development partners and private management partners for the Public Housing program, and directly for the
Housing Choice program.

d. **Minimum Rent.**

In light of current federal budget constraints and cutbacks, AHA will use MTW to identify opportunities for clients to
contribute toward sustaining subsidized housing assistance and to pay their “fair share.” AHA has identified raising
the minimum rent as one of those opportunities. AHA has not raised its minimum rent of $25 in over 10 years.
Under its Public Housing and Housing Choice programs, AHA will increase the amount of minimum rent for all
clients receiving subsidy assistance that are paying rent based on a percentage of their adjusted household
income. AHA will increase the minimum rent from $25 to $125. Elderly and disabled households, where all
members of the household are elderly or disabled and are on fixed government entitlement incomes, will be exempt
from the minimum rent increase, and will pay their rents based on 30% of their adjusted gross incomes. AHA will
provide hardship waivers on a case-by-case basis, based on standards and criteria established by AHA.

In planning for the implementation of this minimum rent increase, AHA conducted a rent burden analysis for its
Public Housing and Housing Choice Programs. This analysis indicates that their will be no significant impact on
current or waiting list families for both the Public Housing and Housing Choice Programs.

e. **Elderly Income Disregard.**

AHA will implement an income disregard program for elderly clients, whether head of household or household
member, who are on government entitlement income such as SSI or social security, for income increases related to
their employment.

2. **Resource Management Policy Initiatives**

AHA intends to incorporate a number of new policies in its operations during FY 2005 to support demonstration
initiatives one through three. These policies are intended to improve the effectiveness of the Public Housing
Program or Housing Choice Program, as applicable, and are set forth below.

a. **Sustaining Investments in Mixed-Income, Mixed-Finance Communities.**

The “Sustaining Investments” initiative has two components. First, AHA intends to explore the feasibility of
converting the form of operating subsidy it provides to AHA sponsored mixed-income developments from Section 9
subsidy to Project-Based Section 8 subsidy. Each of the mixed-income communities is owned by a separate private ownership entity, in which an affiliate of AHA holds an interest. Each of these communities has a percentage of the apartments reserved for families who are eligible to receive a subsidy from AHA under Section 9 of the 1937 Act so that these apartments operate on a break even basis. AHA, together with the owner entity, will explore Georgia Department of Community Affairs (DCA), other funding partners (e.g. lenders and equity investors) and HUD the feasibility of changing the source of subsidy from Section 9 to Section 8 under the 1937 Act. This substitution will not adversely affect the interest of the assisted families but would, if feasible, enhance the sustainability of the property. If determined feasible, this substitution will be implemented at one or all of the communities in fiscal year 2005. As a part of the implementation of this strategy, it could involve an administrative disposition, opt out or conversion, depending on the HUD regulations and guidelines. The intent is to work with our development partners and other financial stakeholders to create a rent structure and funding mechanism for the mixed-income communities that will allow the properties to operate at a more sustainable level. There are several issues that will need to be explored and addressed as part of this initiative component.

The second part of this initiative involves streamlining compliance and reporting. AHA intends to replace the HUD compliance requirements for the public housing assisted units at the AHA sponsored market rate, mixed-income communities with the Low Income Housing Tax Credit compliance regime. In all cases at the AHA sponsored mixed-income communities, the development cost of the public housing assisted units is partially subsidized by tax credit equity, and the public housing assisted units count as tax credit units. As tax credit units, the public housing assisted units are already subject to the tax credit compliance regime. Therefore, the public housing assisted units are subject to a double layer of compliance requirements, i.e. requirements associated with tax credits and requirements associated with the public housing program.

The intent of both the public housing and tax credit programs is to serve eligible low-income families; therefore, the primary compliance requirements of both programs focus on intake and income eligibility. AHA believes that this will simplify the administrative burden of having to administer both compliance programs at the property level. The penalties for noncompliance under the tax credit regime can be severe, even resulting in a recapture of the tax credits. Therefore, there is adequate motivation for the developer and management company to observe compliance requirements to ensure that low-income families are served and that the property is properly maintained. AHA will work with its development partners and DCA to implement new compliance reporting requirements as part of this initiative.

b. Setting “Market” Rents.

AHA will explore different rent structures for both the Public Housing and Housing Choice Programs to further align the program with private sector practices as well as to maximize the use of the subsidy resource. AHA may select one or more of its conventional public housing communities for participation in an affordable flat rent demonstration,
and AHA may choose to use a flat rent structure at certain properties based on several property-related factors, including, but not limited to, the particular community in question, location, unit size, operating costs and other expenses, demand for the community, community demographics, and the amenity package. These simpler rent structures will be easier to administer. AHA may also work with our development partners to develop new rent structures at our market rate, mixed-income communities. However, this process would be done in consultation with other financial participants and stakeholders, e.g. lenders, equity investors, and DCA.

For the Housing Choice Program, AHA may establish new standards to determine the rents that will be paid to private landlords. These standards will be used in place of the Fair Market Rents (FMR's) published annually in the Federal Register. AHA will no longer use HUD’s “rent reasonableness test” to set rents, which requires a test using a comparison of three (3) comparable non-assisted units. In place of the HUD mandated rent levels and tests, AHA will use a market study which will take into account site and neighborhood conditions, local market conditions, location, poverty levels, and other relevant factors in determining fair private market rents. This initiative will allow AHA to set subsidy amounts according to true, targeted market comparables. The ability to set rents apart from the HUD promulgated FMR will allow AHA to maximize Housing Choice Voucher budget authority and may be used as a deconcentration tool to move families from pockets of high levels of poverty within the city. AHA also anticipates that setting these rent standards as described will encourage private landlord participation.

In the event that AHA implements any type of rent demonstration activities, AHA will perform a rent impact analysis, consult with the affected clients, obtain approval of its Board of Commissioners, and implement the activities in accordance with its MTW Agreement.

This initiative also envisions modifications to participant portability procedures. When a family moves under portability to an area outside AHA’s jurisdiction, the Receiving Public Housing Authority (PHA) will administer assistance for that family. However, AHA will impose certain conditions for out-going porting families on Receiving PHAs. These conditions will include, but not be limited to: family compliance with a work requirement; periodic criminal background checks; participation in self-sufficiency and Good Neighbor programs; and maximum payment standard, etc. AHA will administer compliance with the conditions. Based upon these conditions, the Receiving PHA will have the option of accepting or rejecting the porting family. Families that port to geographic areas where AHA determines that it is unfeasible to administer compliance for porting families, AHA may waive such conditions on a case by case basis. The envisioned modifications to the portability procedures will also include adjustments to the administrative fee split between AHA and the Receiving PHA for porting families. The ability to make adjustments to the administrative fee split will allow AHA to provide compliance and supportive services for families that have ported to other jurisdictions.
AHA will seek to enter into cooperative agreements with other local housing authorities regarding portability conditions and will educate program participants and local landlords regarding the modified portability conditions. This initiative should result in equal treatment and opportunity for all AHA program participants.
**Implementation Strategy and Schedule**

AHA will thoughtfully and strategically roll-out the MTW demonstration initiatives over the term of the MTW Agreement. Implementation of initiatives will span the term of the MTW Agreement and adjustments will be made based on such factors as market conditions, status of families, and availability of resources. The table below highlights the general implementation schedule and corresponding goals where appropriate.

<table>
<thead>
<tr>
<th>Demonstration Initiative</th>
<th>Sub-Initiative</th>
<th>Implementation Start Schedule*</th>
</tr>
</thead>
<tbody>
<tr>
<td>Transforming All Conventional Public Housing Assisted Communities to Market Rate, Mixed-Income Communities</td>
<td>Repositioning Portfolio Development of Affordable Assisted Living</td>
<td>July 1, 2004</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
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<tr>
<td>Using Housing Choice Vouchers to Provide Access to Communities of Opportunity</td>
<td>Demonstration Plan Partnership in Private Development Deals (Project-Based Procurement)</td>
<td>September 1, 2004</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Providing Appropriate and Affordable Housing for Seniors and Persons with Disabilities</td>
<td>Designated Housing and Percentage Based Mixed-Population Housing Elderly Admissions Preferences</td>
<td>July 1, 2004</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Implementing Policies that Support Building Healthy Communities</td>
<td>Family Policy Initiatives Program Requirements Individual Development Accounts (IDA) Initiative Clean and Safe Environment Requirement Minimum Rent Elderly Income Disregard</td>
<td>July 1, 2004 ** July 1, 2004 *** Immediately July 1, 2004 ** July 1, 2004**</td>
</tr>
<tr>
<td></td>
<td>Resource Management Policy Initiatives -Explore Funding Switch/Rent Structure -Tax Credit Compliance Model Setting &quot;Market&quot; Rents Affordable Flat Rent Demonstration Program -Setting Market Rents Under Housing Choice Program</td>
<td>July 1, 2004 July 1, 2004 July 1, 2004</td>
</tr>
</tbody>
</table>

*Date by which AHA will begin work on developing and implementing these new initiatives.

**The target date for implementation completion and enforcement of these policies is **October 1, 2004.**

***The target date for implementation completion of this policy is **April 1, 2005.**
PART III: CORE ACTIVITY

Overview:

AHA is organized under Georgia law to develop, acquire, lease and operate affordable housing for low-income families. Today, AHA is the largest public housing agency in Georgia and one of the largest in the nation, serving approximately 50,000 people.

During FY 2005, AHA will continue to operate in the following core activity areas:

- Client Services
- Real Estate Management and Housing Choice
- Real Estate Development and Acquisitions
- Financial Operations

This section will more fully describe these core activity areas and will also include HUD required information for the MTW Plan.

Since AHA’s MTW Agreement was executed on September 25, 2003, AHA has chosen December 31, 2003 as the date for its family demographics baseline data and June 30, 2003 for its Public Housing Inventory data, for the initial Fiscal Year 2004 of its MTW Demonstration Program. Please note that, unless otherwise indicated, the baseline data provided in this plan relates to all MTW-funded Housing Choice vouchers and public housing assisted units, regardless of whether such units are located in conventional public housing assisted communities or AHA sponsored mixed-income communities. Non-MTW funded Housing Choice vouchers are not included in this baseline information. AHA has not provided data on tax credit or market-rate households at its mixed-income communities nor has AHA provided data on households at properties owned by AHA which have not been funded by HUD subsidy. And finally, in that AHA’s FY 2005 MTW Plan submission precedes the beginning of its 2005 fiscal year, AHA will include July 1, 2005 baseline data in its MTW Annual Report submission due to HUD by September 1, 2004.

A. Client Services

In FY 2005, AHA’s client services delivery will be based on three principles: (1) our families must have equal access to AHA’s Client Services programs regardless of the type of subsidy assistance received, (2) our families must have comprehensive and hands-on support to connect them to mainstream society and new opportunities, and (3) AHA’s Client Services programs must be outcome-driven with the expectation of success for all families.
During FY 2005, AHA will redesign its existing client services programs and service delivery system to be consistent with the MTW strategy focused on preparing families to live in market rate, mixed-income communities. MTW demonstration initiative #4 described earlier will introduce new policies and standards for families which set the focus for self-sufficiency and their transition off subsidy assistance. Such policies will include mandatory program participation, an increase in minimum rent, and access to Individual Development Accounts (IDA). Client Services will be redesigned to be a resource to families in making these life-changing transitions.

AHA, through its contracts with SPARTA Consulting and Integral Management Services (IMS), currently provides coaching and counseling services which help affected families from certain HOPE VI communities enter into the mainstream with a goal of enabling them to be self-sustaining. This approach will be a model for the future delivery of Client Services and will take a “how-to” approach in assisting families with developing the knowledge, skills, and capacity to address issues associated with childcare, transportation, employability, education, and financial well-being.

One challenge that AHA faces is the limited amount of funding received from HUD for supportive services. To that end, AHA intends to engage the assistance of the private foundation community. As part of this strategy, AHA will complete a human services assessment of families in its subsidy programs. Data from this assessment will benchmark the baseline state of our families. With this data we will identify needs, reach out to service providers who are able to address these needs and assess the effectiveness of these service providers. With this assessment, AHA can develop a case statement and solicit the private foundation community for resources needed to develop a network of services to support our families’ success.

AHA will continue to provide core client services programs serving youth, adults, seniors, and the disabled. Services will range from after school programs for youth, employment preparation and placement for adults, and services that are necessary for elderly, frail, and disabled residents to continue to live independently within or near AHA communities. Each of AHA’s program offerings are administered by well qualified community partners who have a proven level of expertise in their given service delivery areas. Service providers include, but are not limited to, the Boys & Girls Clubs of Metro Atlanta, the YMCA of Metropolitan Atlanta, Clark Atlanta University’s Department of Environmental Justice, and Quality Living Services, Inc. Through AHA’s Housing Choice Family Self-Sufficiency (FSS) Program, AHA will continue to offer counseling, coaching, service referrals, and escrow account benefits to families. AHA will also continue to rely on its private development partners and private management companies to deliver high quality client services to families. These partners will connect families to core client services programs provided through AHA as well as to other community resources.

A1. Homeownership Programs

AHA has two Homeownership Programs available to its clients. The first program, the “Keys to Homeownership” Program, funded through HUD’s ROSS grant program, is for families in AHA’s conventional public housing assisted communities. The “Keys to Homeownership” Program is designed to assist families to prepare themselves financially and otherwise for
homeownership and to provide tools for understanding the home-buying process. Families must meet certain requirements to be eligible to participate, such as have sustained employment for at least one year.

The second program is AHA’s Housing Choice Homeownership Program. This program allows families to use their rental subsidy to pay for all or a portion of a mortgage payment for their first home. AHA’s Homeownership Program Coordinator works closely with qualified lending institutions, real estate agents, inspectors, appraisers and attorneys to offer the highest level of service delivery available. In addition, AHA provides homeownership counseling classes, budget/money management training, credit counseling, and default and foreclosure counseling for our families. Residents of conventional public housing assisted communities who participate in the “Keys to Homeownership” Program also have access to the Housing Choice Homeownership Program.

B. Real Estate Management and Housing Choice

The Real Estate Management and Housing Choice core activities include AHA’s oversight of its public housing assisted real estate portfolio and the management of its Housing Choice Voucher subsidy program, respectively.

AHA has fully outsourced the management of its conventional public housing portfolio to professional, third-party private management companies (PMCOs). The PMCOs are responsible for the day-to-day on-site property management functions including rent collections, property upkeep and maintenance, property planning, client services and construction activities. As of December 31, 2004, AHA had the following properties in its conventional public housing real estate portfolio that are a part of the MTW initiative:

- 17 conventional public housing assisted family communities (including the John Hope Model Building, a six-unit residential building remaining from the revitalization of John Hope Homes into The Villages at Castleberry Hill); and
- 17 conventional public housing assisted high-rise communities.

AHA is also the sponsor or partner in 14 mixed-income communities which are owned by affiliates (owner-entities) of AHA’s development partners and are managed by private management companies engaged by the owner-entities. These are market rate, mixed-income communities with a seamless affordable component. As of December 31, 2003, AHA served 8,497 families under the Public Housing Program, including families in public housing assisted units at the mixed-income communities.

As of December 31, 2003, AHA had 12,040 Housing Choice Vouchers (including 8,792 MTW funded vouchers) of which 11,305 were leased. During FY 2005, the administration of AHA’s Housing Choice Program will continue to be carried out by a core team of internal AHA staff. The program will include administration of Housing Choice vouchers, qualifying applicants, providing housing counseling, marketing and landlord outreach, implementation of the Housing Choice Voucher Homeownership Program and special purpose programs (i.e. non-MTW funded) including the Mainstream, Welfare-to-Work,
Family Unification and Family Self-Sufficiency programs. AHA’s Housing Choice department also shares responsibility with AHA’s Real Estate Development and Acquisitions department for soliciting and providing project-based Housing Choice Voucher subsidy assistance to new construction multi-family projects, existing multi-family projects and multi-family projects which require substantial rehabilitation. To date, AHA has committed to provide housing assistance payments for 1,630 units through our Project-Based Housing Choice program including 1,580 since April 10, 2001. AHA intends to continue to provide project-based Housing Choice Voucher assistance for new developments, existing and rehabilitation projects during the next fiscal year. Using its MTW Authority, AHA will also explore how the project-based voucher administration can be relinquished to management companies for project-based communities.

Using its MTW Authority, AHA will make additional policy and program changes to further enhance its operations in both its public housing and Housing Choice programs. These additional changes include but are not limited to revising its criminal history screening policy, enhancing its inspections protocol, designating housing for elderly and/or disabled clients, and enhancing its client survey process. These changes will be further discussed in this core activity section of the plan.

### Designated Housing

As part of the third demonstration initiative described in Part II of this MTW Plan, AHA will immediately implement the creation of “percentage based mixed-population” communities at all of its high-rise communities, and may designate one or more of its 17 high-rise communities as “elderly only.” A list of candidate properties for these activities can be found in Appendix B. As part of its repositioning demonstration initiative described in Part II of this MTW plan, AHA will conduct appropriate research and analysis to determine which properties may be designated. AHA will consult with the residents of the affected properties and obtain approval of its Board of Commissioners for any properties which require the submission of designation plans to HUD for approval.

### Client Surveys

AHA and its private development partners and private management agents will develop and conduct client surveys to monitor and assess AHA’s performance at its conventional public housing communities and the AHA sponsored mixed-income communities. AHA will report the results to HUD in AHA’s Annual MTW Report. This client surveying process will be used in place of the standard resident survey conducted by HUD.

### B1. Households Served

Since the execution of AHA’s MTW Agreement, the composition of the households served has remained substantially
unchanged in AHA’s Public Housing and Housing Choice programs. Appendix C displays more detailed charts regarding family characteristics such as race and ethnicity of households served, unit size, incomes, and race and ethnicity of households served by AHA.

Unit Size: The number and unit size occupied by AHA households are presented in Table C-1 of Appendix C. The Housing Choice Program accounts for 50.92% of the total number of households served by AHA and Public Housing Program accounts for 49.08%.

Family Type: The number and types of households served are presented in Table 1-1 below. As of December 31, 2003, there were a total of 8,792 households including elderly and disabled participating in the Housing Choice Program and 8,474 households participating in the Public Housing Program, including families at both the AHA conventional public housing communities and at the mixed-income communities.

Table 1-1: Heads of Household Served as of December 31, 2003

<table>
<thead>
<tr>
<th>Program</th>
<th>Family*</th>
<th>Percent</th>
<th>Elderly**</th>
<th>Percent</th>
<th>Disabled***</th>
<th>Percent</th>
<th>Program Total</th>
<th>Percent Program</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Housing Assisted</td>
<td>4,115</td>
<td>37%</td>
<td>1,797</td>
<td>82%</td>
<td>2,562</td>
<td>63%</td>
<td>8,474</td>
<td>49%</td>
</tr>
<tr>
<td>Housing Choice</td>
<td>6,887</td>
<td>63%</td>
<td>402</td>
<td>18%</td>
<td>1,503</td>
<td>37%</td>
<td>8,792</td>
<td>51%</td>
</tr>
<tr>
<td>Program Total</td>
<td>11,002</td>
<td>100%</td>
<td>2,199</td>
<td>100%</td>
<td>4,065</td>
<td>100%</td>
<td>17,266</td>
<td>100%</td>
</tr>
</tbody>
</table>

* Family is defined as any adult (18 to 61) head of household, excluding the elderly and disabled.
** Elderly is defined as any head of household 62 years of age and older.
*** Disabled is defined as any adult head of household who is disabled and under the age of 62.

Income Group: Table C-2 in Appendix C summarizes the income levels of all households served by AHA. Just over 86% of the households served under both the public housing and Housing Choice subsidy programs have an income below 30% of the area median income (AMI). Less than two percent of households served have incomes over 50% of AMI.

Housing Type: AHA has a total of 8,725 units in its Public Housing stock. Eight thousand four hundred seventy-four (8,474) or just over 97% of units were rented as of December 31, 2003. Public Housing Inventory Information can be found in Appendix D.

Race and Ethnicity: Tables C-3 and C-4 in Appendix C highlight the racial make-up of the heads of household served by AHA. Table C-5 provides a racial breakout by property. AHA’s resident population is comprised mostly of African Americans, over 95% and is overwhelmingly non-Hispanic (98.91%).
B2. Housing Needs

AHA partners with the State of Georgia, The City of Atlanta, private sector entities, and non-profit agencies in a collaborative approach to addressing the housing needs of citizens in the city of Atlanta, AHA’s jurisdiction. In its assessment of housing needs in the City of Atlanta, AHA is informed by the State of Georgia’s Consolidated Plan, The City of Atlanta’s Consolidated Plan, 2000 Census data, AHA waiting list information, and other information resources.

In November 2001 AHA’s Board of Commissioners authorized the implementation of site-based waiting lists at all of its conventional public housing communities to facilitate resident choice. The implementation is now completed. Many of the site-based public housing waiting lists are open year round so that families with housing needs may apply at the location which works best for their particular circumstances. The management companies for the mixed-income communities also administer their own site-based waiting lists.

AHA has received a number of comments regarding the complexity of its local preferences. In response, AHA has reduced its number of local preferences at the family communities from 15 to 4 and high-rise communities from 12 to 1. These preferences may be found in Appendix E. The PMCOs recently purged their waiting lists in accordance with these new preferences.

Applicants for Public Housing: As indicated in Appendix C, Table C-10, just over 86% of the families on the combined waiting lists for the Public Housing program earn incomes that are less than 30% of AMI. As reflected in Table C-9, the majority of families on AHA’s combined public housing waiting lists, 15,745 or just over 97% are African American.

Applicants for Housing Choice: The Housing Choice Program maintains two separate waiting lists. The Mainstream waiting list is only for the disabled and was last opened in July 2001. The Standard waiting list was last opened in October 2001. As of December 31, 2003 as indicated in Table 1-2 below, there were 21,387 applicants on the Standard waiting list and 1,286 applicants on the Mainstream waiting list. Of the 1,286 persons on the Mainstream waiting list, 135 are elderly. Eight hundred thirty seven (837) of the 21,387 households on the standard waiting list are elderly.
### Table 1-2: Composition of Households on AHA’s Housing Choice Waiting Lists as of December 31, 2003

<table>
<thead>
<tr>
<th>Housing Choice Waiting List</th>
<th>Mainstream</th>
<th>Standard</th>
</tr>
</thead>
<tbody>
<tr>
<td>Family Type:</td>
<td>Number of Families</td>
<td></td>
</tr>
<tr>
<td>Disabled (N)</td>
<td>0</td>
<td>19,447</td>
</tr>
<tr>
<td>Disabled (Y)</td>
<td>1,286</td>
<td>1,940</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>1,286</strong></td>
<td><strong>21,387</strong></td>
</tr>
<tr>
<td>Elderly</td>
<td>135</td>
<td>837</td>
</tr>
<tr>
<td>Income Group:</td>
<td>Number of Families</td>
<td></td>
</tr>
<tr>
<td>&lt;30% AMI</td>
<td>1,281</td>
<td>19,733</td>
</tr>
<tr>
<td>30 - 50% AMI</td>
<td>0</td>
<td>1,478</td>
</tr>
<tr>
<td>51 - 80% AMI</td>
<td>0</td>
<td>112</td>
</tr>
<tr>
<td>&gt;80% AMI</td>
<td>5</td>
<td>64</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>1,286</strong></td>
<td><strong>21,387</strong></td>
</tr>
<tr>
<td>Race &amp; Ethnicity:</td>
<td>Number of Families</td>
<td></td>
</tr>
<tr>
<td>Caucasian</td>
<td>67</td>
<td>1,006</td>
</tr>
<tr>
<td>African American</td>
<td>1,218</td>
<td>20,129</td>
</tr>
<tr>
<td>American Indian</td>
<td>1</td>
<td>194</td>
</tr>
<tr>
<td>Asian</td>
<td>0</td>
<td>58</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>1,286</strong></td>
<td><strong>21,387</strong></td>
</tr>
<tr>
<td>Hispanic</td>
<td>3</td>
<td>58</td>
</tr>
<tr>
<td>Non-Hispanic</td>
<td>1,283</td>
<td>21,329</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>1,286</strong></td>
<td><strong>21,387</strong></td>
</tr>
</tbody>
</table>

### B3. Projected Number of Households to be served

By the end of its FY 2005 MTW Plan year, AHA projects that it will serve 19,802 families, substantially the same number of families served by AHA at the beginning of its FY 2005 MTW plan year, with an anticipated shift of families from the Public Housing Program to the Housing Choice Program in alignment with AHA’s repositioning strategy. The number of projected families that AHA will serve may be impacted by HUD funding.
B4. Occupancy Policies

Statement of Policies governing eligibility, selection, admissions, assignment, and occupancy of families, including the admissions policy under section 16(a)(3)(B) for deconcentration of lower-income families.

“The Statement of Corporate Policies Governing the Leasing and Residency of Assisted Apartments” can be found in Appendix E. In addition, AHA’s existing Housing Choice Administrative Plan may be found in Appendix G. During FY 2005, AHA will be modifying the Housing Choice Administrative Plan to incorporate new policy changes discussed in Part II of this plan.

In both its Public Housing and Housing Choice Programs, AHA wants to eliminate activities that will negatively impact the health, safety and welfare of families and those persons who participate in that activity. Criminal activity and offenders will not be tolerated. To achieve this objective, during FY 2005 stringent criminal history screening practices will be implemented that will result in either the denial of assistance, in the case of applicants, or termination or assistance, in the case of existing residents, for specified periods of time based on the severity of the offense. Certain crimes, such as murder and rape will result in the permanent denial of assistance. Other crimes will result in shorter periods of denial. AHA will use uniform criminal screening criteria for both the Housing Choice and Public Housing programs.

Statement of Rent Policy

The Statement of Rent Policy may be found in “The Statement of Corporate Policies Governing the Leasing and Residency of Assisted Apartments” located in Appendix E. The Housing Choice Administrative Plan found in Appendix G contains rent policies for AHA’s Housing Choice program.

As previously mentioned, AHA will implement a work requirement under its fourth demonstration initiative. AHA’s policy will permit rent relief only for clients who are terminated from employment for circumstances beyond their control.

B5. Changes in the Housing Stock

As of June 30, 2003, AHA had a total of 8,725 public housing assisted units in its portfolio. By June 30, 2005, AHA projects to be serving substantially the same number of residents as the beginning of its plan year of July 1, 2004. However, AHA anticipates that the number of public housing assisted units in its portfolio will change by June 30, 2005 in alignment with the implementation of its real estate repositioning strategy as described in the first demonstration initiative, and as scheduled public housing units are developed in the AHA-sponsored mixed-income communities, subject to HUD funding. Table 1-3 below shows the current and projected number of units for AHA’s Housing Inventory. Additional information regarding the breakdown by unit size of existing units is outlined in Table D-1 in Appendix D.
Table 1-3: Total Current and Projected Public Housing Units

<table>
<thead>
<tr>
<th>Public Housing Assisted Total</th>
<th>Total Units as of 12/31/03</th>
<th>Total Units Projected for 6/30/05</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Housing Assisted Total</td>
<td>8,725</td>
<td>8,309</td>
</tr>
<tr>
<td>High-Rise Communities</td>
<td>3,082</td>
<td>3,082</td>
</tr>
<tr>
<td>Family Communities</td>
<td>4,396</td>
<td>3,573</td>
</tr>
<tr>
<td>Mixed-Income Communities</td>
<td>1,247</td>
<td>1,654</td>
</tr>
</tbody>
</table>

B6. Public Housing Program Management

Occupancy Rates

Occupancy Rates by Property as of December 31, 2003. AHA had an overall adjusted occupancy rate of 98.49% as of June 30, 2003. The adjusted occupancy rate for each of AHA’s public housing assisted communities including public housing assisted units at the mixed-income properties may be found in Appendix D, Table D-2.

Issues and Proposed Actions. AHA, its development partners and PMCOs are continuously updating and enhancing leasing efforts, which includes turning units in a more efficient manner.

Target Rates by Property for June 30, 2005. AHA is currently exceeding the benchmark set for the occupancy rate. The benchmark rate established for the end of the fiscal year is 98%.

Rent Collections

Percentage of Uncollected Rents as of December 31, 2003. AHA’s percentage of uncollected rents was 1.77% as of June 30, 2003. Percentages of uncollected rents are presented by community in Appendix D, Table D-3.

Issues and Proposed Actions. AHA, through its development partners and PMCOs, has maintained strong collections through better client intake, lease enforcement and improved case management.

Target Projection of Uncollected Rents for June 30, 2005. AHA has set high standards and is working to ensure that overall average percentage of uncollected rents is maintained at or below 2%.
Work Orders

Percentage of Responses to Emergency Work Orders less than 24 Hours. As of June 30, 2003, AHA, through its development partners and PMCOs, completed or abated 99.62% of all emergency work orders received in less than 24 hours. Table D-4 of Appendix D displays the percentage of emergency work orders responded to in a time frame of less than 24 hours. Table D-4 also contains data regarding the average number of days taken to respond to routine non-emergency work orders. This information is provided for each community.

Percentage of Responses for Routine Work Orders within 30 days. AHA, through its development partners and PMCOs, responded to routine non-emergency work orders at an average rate of 2.87 days as of June 30, 2003.

Issues and Proposed actions. AHA, through its development partners and PMCos, has maintained responsive and responsible emergency and non-emergency work order turnaround through budgeting adequate funds, qualified staffing, material resources and non-routine expenditures. In addition, the operations capacity is enhanced by well planned and managed capital improvements.

Target Projection of Work Orders for June 30, 2005. AHA’s MTW benchmark goal is to complete or abate emergency work orders in less than 24 hours of issuance no less than 99% of the time. In addition, it is AHA’s goal to complete routine non-emergency work orders in less than 7 days.

Inspections

Inspection Strategy. Each development partner and PMCO is required to inspect 10% of the units at each property per month, for both the conventional public housing communities and public housing assisted units at AHA-sponsored mixed-income communities. Work orders should be completed in a timely manner based on established benchmarks. At year end each development partner and PMCO is required to certify that 100% of all units, buildings, and common areas have been inspected and work orders have been completed to address deficiencies. As a quality control component, AHA inspects at least 1.4% of the units at all communities on an annual basis.

AHA is currently in the process of developing a more stringent oversight process for inspections. In addition, the agency intends to implement an enhanced Uniform Physical Conditions Standards (UPCS) inspection standard.

Planned Inspections for FY 2005. AHA anticipates completing 100% of its planned inspections by the end of each fiscal year.

Security

AHA believes that the level of crime in a community is one of several key benchmarks and indicators of the overall health of the community. AHA desires to provide communities that are safe, crime free, and that provide quality living environments.
that set the stage for realization of good possibilities and outcomes for families. Over the next few years, AHA will address crime and safety in its communities through collaboration strategies with its private development partners, PMCOs, law enforcement, and residents. AHA will also implement community building strategies to improve safety in communities.

Safety and Security Issues: AHA recognizes that 95% of all crimes committed at AHA owned properties occur at its conventional public housing assisted family communities. Of its 17 family communities (including the John Hope Homes Model Building), 8 are classified by law enforcement as “hot” properties. Though financial resources to support safety and security are shrinking, AHA continues to identify long-term sustainable strategies that are grounded in collaboration with local law enforcement agencies and technology.

Integrated Solutions: AHA will monitor the overall health of its communities and will provide oversight of PMCOs’ crime reduction and safety efforts. AHA will also establish and enforce strong policies to reduce criminal activity in its communities. The policies will address such areas as criminal history screening for applicants and residents, lease enforcement, and zero drug and crime tolerance. AHA will continue to implement strict lease enforcement policies to remove criminal and substance abuse activity from the communities. Those who cannot control their actions or the actions of their family members and guests, and who engage in criminal activity, will lose the privilege of continuing to reside in AHA communities and continuing their subsidy assistance. Criminal history screening will be conducted by each management company with the cooperation of AHA’s Protective Services Department and local law enforcement.

Internally, AHA’s responsible departments will develop comprehensive and integrated solutions for addressing community crime and safety. Protective Services will provide data collection and analysis, improved planning and prioritization of risk areas, development of metrics for the “civility” of the property in terms of tracking improvements and comparison to other properties, improved contract administration, command center monitoring, cross functional dialog for development of integrated solutions, collaboration among stakeholders, implementation of training programs, and public relations program with the PMCOs. AHA’s Protective Services department will leverage existing relationships with local law enforcement agencies. Real Estate Management will focus on capital improvements utilizing Crime Prevention through Environmental Design (CPTED) principles in design, property assessments, surveillance, access control, and technology. Development partners and PMCO’s will be responsible for operations as it relates to addressing crime and safety including the implementation of CPTED strategies, effective “intake” process, zero drug and crime tolerance, lease enforcement, advanced technology, crime prevention and education for residents, and new strategies for on-site security personnel.
B7. Housing Choice Management

Leasing Information

Units under lease (%) as of December 31, 2003. Approximately ninety-four percent (94%) of vouchers available under the Housing Choice program were leased as of December 31, 2003.

Target lease rate for June 30, 2005. AHA’s target rate for June 30, 2005 is 95%.

Inspection Strategy

Description of Inspection Strategy. AHA will develop enhanced protocols for its inspections processes in both the multi-family and single family settings. AHA envisions more stringent obligations relating to both private landlords and program participants regarding the suitability and maintenance of assisted units.

To further enhance its Housing Choice Program using its MTW authority, AHA will develop elevated standards, including site and neighborhood standards, for its inspection processes for both multi-family and single family rental housing. Reasonable fees will be charged for pre-inspections or for re-inspections when units fail inspections on multiple occasions in order to cover the administrative cost of re-inspecting units numerous times. Likewise, if multiple re-inspections are required because of tenant-obligated deficiencies, a fee will be charged to the participant family to cover the cost of re-inspecting the unit. AHA will set higher standards regarding acceptance of properties to the Housing Choice Voucher program. In addition, AHA will review the existing Housing Choice portfolio against these enhanced inspections standards.

AHA will also develop a mandatory Landlord Certification Training Program through which AHA will educate private landlords as to the requirements to place and maintain properties on the Housing Choice Voucher program and their responsibilities as landlords. The Certification Training Program should result in higher quality units, fewer inspections and better relations between AHA and HCVP landlords.

Planned Inspections (%) Completed. AHA has completed 100% of its planned Annual HQS Inspections for Fiscal Year 2004. AHA projects that the percentage of all occupied units inspected during the 2005 Fiscal Year shall be greater than or equal to 98%.
C. Real Estate Development and Acquisitions

As described in the first initiative of Part II of this MTW Plan, AHA will reposition its portfolio in partnership with private-sector development partners procured as a result of a solicitation. In conjunction with implementing this initiative and as a result of reviewing solicited proposals, AHA may engage in a number of activities related to proposals that are accepted, including relocation, demolition, disposition, conversion, and acquisition. At the appropriate time, AHA will submit an acquisition plan to HUD pursuant to the terms of the Development Protocol in AHA’s MTW Agreement or an application for demolition, disposition, or voluntary conversion, as applicable, to HUD. AHA may also demolish, dispose of, or acquire property for other business reasons not associated with its repositioning to address life, safety and health issues. All of AHA’s conventional public housing assisted communities and properties (including mixed-income communities) funded by Section 9 ACC funds are potential candidates for voluntary conversion, demolition or disposition in FY 2005. A list of such properties can be found in Appendix F. In addition, in FY 2005, AHA may pursue and close on real estate in the Metropolitan Atlanta Area (improved or unimproved property) acquisitions in order to expand its real estate portfolio, to provide affordable and/or mixed-income housing opportunities, and to further stabilize its revitalization initiatives and the surrounding neighborhoods.

C1. Development and Planned Activities

Currently, AHA has five (5) HUD funded revitalization projects underway for the following existing or former public housing communities: (1) Capitol Homes, (2) Harris Homes, (3) Grady Homes, (4) Carver Homes, and (5) Perry Homes. Four (4) of these communities are HOPE VI revitalization projects. In addition, AHA anticipates beginning the redevelopment of McDaniel-Glenn in FY 2005, pending the award of a FY 2003 HOPE grant or identification of other funding strategies. AHA intends to engage in development and revitalization activity associated with the initiatives described in Part II of this MTW Plan. The following table highlights AHA’s current development activity status as of December 30, 2003 and projects additional development activity that will continue through FY 2005.
### Summary of AHA Revitalization Program: Rental Housing Completed as of 12/30/03

<table>
<thead>
<tr>
<th>Community</th>
<th>Phase</th>
<th>Rental Apartments</th>
<th>Total Rental Housing Produced To Date For Revitalization</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Public Housing</td>
<td>Project Based S-4</td>
</tr>
<tr>
<td>Centennial Place</td>
<td>I, II, III, IV</td>
<td>301</td>
<td>0</td>
</tr>
<tr>
<td>Summerdale Commons</td>
<td>I, II</td>
<td>74</td>
<td>0</td>
</tr>
<tr>
<td>The Villages of East Lake</td>
<td>I, II</td>
<td>271</td>
<td>0</td>
</tr>
<tr>
<td>Columbia Village</td>
<td>I</td>
<td>30</td>
<td>0</td>
</tr>
<tr>
<td>Columbia Commons</td>
<td>I</td>
<td>48</td>
<td>0</td>
</tr>
<tr>
<td>The Villages at Castleberry Hill</td>
<td>I, II</td>
<td>180</td>
<td>0</td>
</tr>
<tr>
<td>Magnolia Park</td>
<td>I</td>
<td>87</td>
<td>0</td>
</tr>
<tr>
<td>Magnolia Park</td>
<td>II</td>
<td>73</td>
<td>0</td>
</tr>
<tr>
<td>Ashley Courts at Cascade</td>
<td>I</td>
<td>46</td>
<td>0</td>
</tr>
<tr>
<td>Ashley Courts at Cascade</td>
<td>II</td>
<td>54</td>
<td>0</td>
</tr>
<tr>
<td>Ashley Courts at Cascade</td>
<td>III</td>
<td>29</td>
<td>0</td>
</tr>
<tr>
<td>Ashley Terrace at West End</td>
<td>I</td>
<td>34</td>
<td>0</td>
</tr>
<tr>
<td>Villages at Carver</td>
<td>I</td>
<td>110</td>
<td>0</td>
</tr>
<tr>
<td>Villages at Carver</td>
<td>II</td>
<td>33</td>
<td>0</td>
</tr>
<tr>
<td>Villages at Carver</td>
<td>III</td>
<td>108</td>
<td>0</td>
</tr>
<tr>
<td>Columbia High Point</td>
<td>I</td>
<td>0</td>
<td>94</td>
</tr>
<tr>
<td>West Highlands: Columbia Estates</td>
<td>I</td>
<td>50</td>
<td>0</td>
</tr>
<tr>
<td><strong>Subtotal: Units Completed</strong></td>
<td></td>
<td>1528</td>
<td>94</td>
</tr>
</tbody>
</table>

### Summary of AHA Revitalization Program: Rental Housing Under Construction as of 12/30/03

<table>
<thead>
<tr>
<th>Community</th>
<th>Phase</th>
<th>Rental Apartments</th>
<th>Total Rental Housing Under Construction For Revitalization</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Public Housing</td>
<td>Project Based S-4</td>
</tr>
<tr>
<td>West Highlands</td>
<td>II</td>
<td>61</td>
<td>0</td>
</tr>
<tr>
<td>West Highlands: Elderly</td>
<td></td>
<td>0</td>
<td>100</td>
</tr>
<tr>
<td>College Town at West End</td>
<td>I</td>
<td>78</td>
<td>0</td>
</tr>
<tr>
<td><strong>Subtotal: Units Under Construction</strong></td>
<td></td>
<td>139</td>
<td>100</td>
</tr>
</tbody>
</table>

### Summary of AHA Revitalization Program: Rental Housing Planned as of 12/30/03

<table>
<thead>
<tr>
<th>Community</th>
<th>Phase</th>
<th>Rental Apartments</th>
<th>Total Rental Housing Planned For Revitalization</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Public Housing</td>
<td>Project Based S-4</td>
</tr>
<tr>
<td>Villages at Carver</td>
<td>IV</td>
<td>108</td>
<td>0</td>
</tr>
<tr>
<td>West Highlands</td>
<td>III</td>
<td>61</td>
<td>0</td>
</tr>
<tr>
<td>West Highlands</td>
<td>IV</td>
<td>56</td>
<td>0</td>
</tr>
<tr>
<td>College Town at West End</td>
<td>III, IV</td>
<td>221</td>
<td>0</td>
</tr>
<tr>
<td>College Town at West End: Market Rate After close-out</td>
<td>V</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Capitol Homes</td>
<td>I - III</td>
<td>358</td>
<td>0</td>
</tr>
<tr>
<td>Grady Homes</td>
<td>I - III</td>
<td>230</td>
<td>0</td>
</tr>
<tr>
<td><strong>Subtotal: Units Planned</strong></td>
<td></td>
<td>1033</td>
<td>0</td>
</tr>
</tbody>
</table>

**Total Housing Units for AHA’s Revitalization Program**

- Total Rental Apartments: 2701
- Total Project Based S-4: 194
- Total Tax Credit Apartments: 1456
- Total Market Rate Apartments: 2667
- Total Total Rental Apartments: 7018

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Atlanta Housing Authority (AHA)
Fiscal Year 2005 Moving to Work (MTW) Plan

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C2. Homeownership Development Activities

Over the next five years, AHA, in conjunction with its development partners, plans to build approximately 972 for-sale homes at its mixed-income communities and at scattered site locations throughout Atlanta. The homes will be sold to families of all income levels with 22% (216) made available for low to moderate income families earning no more than 60-115% of AMI.

AHA will provide subsidy assistance, where feasible, and homebuyer counseling to qualifying homebuyers. AHA has allotted $2.4 million dollars of HOPE VI funds for subordinate mortgage assistance to AHA clients and low to moderate-income families. These subsidies will be available to people whose incomes range between 60% and 115% of AMI.

D. Financial Operations

In FY 2005, AHA will combine the income from three programs into a Single Fund in carrying out the activities of the MTW Plan. Low Income Operating Subsidy and related income from property operations, Housing Choice Voucher Income, and Capital Fund Program Income will be used interchangeability for eligible MTW purposes. AHA will also use other program funds such as HOPE VI, Development Grants, and ROSS Grants to carry activities related to those grants, but are not considered a part of the MTW agreement activities.

D1. Sources and Amounts of Funding included in the Consolidated Budget Statement

Low Income Operating Subsidy and Related Income

AHA submitted the calculation of its Low Income Operating Subsidy for FY 2005 to HUD on March 31, 2004. Based on our calculation we estimated that AHA would be eligible for $32.3 million in FY 2005 operating and utility subsidy. Assuming a 97% proration, AHA expects to receive approximately $31.4 million in low income operating subsidy for FY 2005 before prior year adjustments. AHA expects to receive $15.6 million in resident rental income.

Housing Choice Voucher Related MTW Income

- AHA estimates that it will receive $108.7 million in Housing Choice Voucher Related income in the MTW Block Grant.
- Funding was calculated using the methodology outlined in Appendix A of the AHA Moving to Work agreement based on a total of 141,979 voucher unit months subject to MTW funding.
### Housing Choice Voucher Related Funding Calculated in accordance with AHA’s MTW Agreement

<table>
<thead>
<tr>
<th>Total funds Required (FFY 2002 Settlement)</th>
<th>$98,905,898</th>
</tr>
</thead>
<tbody>
<tr>
<td>Unit Months (FFY 2002)</td>
<td>136,845</td>
</tr>
<tr>
<td>PUM</td>
<td>$722.76</td>
</tr>
<tr>
<td>AAF Factor (Blended FFY 2003 &amp; FFY2004)</td>
<td>1.041</td>
</tr>
<tr>
<td>MTWPUC (FY 2004)</td>
<td>$752.03</td>
</tr>
<tr>
<td>AAF Factor*</td>
<td>1.018</td>
</tr>
<tr>
<td>MTWPUC (For FY 2005)</td>
<td>$765.57</td>
</tr>
<tr>
<td>FY 2005 MTW Voucher Unit Months</td>
<td>141,979</td>
</tr>
<tr>
<td><strong>FY 2005 MTW Housing Choice Funding</strong></td>
<td><strong>$108,694,863</strong></td>
</tr>
</tbody>
</table>

Key: AAF = Annual Adjustment Factor  PUM = Per Unit Month  PUC = Per Unit Cost

*The AAF will be adjusted mid-year when new rates are published. This rate is used for budget purposes pending the release of new AAF published rates.

### Capital Funding Program Related MTW Income

- Based on current funding methodology, AHA estimates that it will receive a $12.8 million grant award from the Capital Funding Program (CFP) in the AHA’s FY 2005 MTW Block Grant. This is a reduction of $1.8 million resulting primarily from taking Capitol Homes offline in FY 2002 and removing those units from the calculation of this year’s CFP grant award.

- In addition to the new CFP award, AHA plans to use $11.4 million in unexpended prior year CFP Grant award funds in FY 2005.

The Consolidated Budget is included in Appendix H.

### D2. Uses of Funds

### Previous Year Expenditures

FY 2004 is the first year of AHA’s MTW demonstration project. As such, no comparable financial information was recorded in FY 2003, and AHA’s FY 2004 will end on June 30, 2004. FY 2004 financial information will be provided in AHA’s MTW Report for FY 2004 and will also be included in the FY 2006 MTW Plan.
Planned Expenditures

Public Housing Assisted Portfolio

- AHA will use MTW funds for the operations and maintenance requirements for an average of 8,808 public housing assisted units. Of this total 7,258 are units located in conventional public housing communities, and 1,550 are public housing assisted units in mixed-income communities.

- AHA will allocate funds to its conventional public housing communities, to meet the daily operation and maintenance requirements of each property based on its size (acreage and units), density, property age and location.

- AHA sponsored mixed-income communities are budgeted at an agreed upon amount based on a methodology outlined in the Regulatory and Operating agreements between AHA and the owner entities, adjusted for actual costs after the year end audit. Generally, AHA funds the difference between resident rental income and the pro rata share of eligible expenses for the public housing assisted units for each community.

- AHA plans to expend $5.5 million in new funds to support new capital projects in FY 2005. In addition, we estimate $7.7 million will be spent in FY 2005 on capital projects begun in FY 2004.

Housing Choice Vouchers – Housing Assistance Payments

- AHA’s FY 2005 budget provides $99.6 million for the funding of Housing Choice Vouchers funded both from the MTW Block Grant and from non-MTW Housing Choice HAP funding.

- This budget assumes that AHA will generally use up to 90% of the published 50th percentile Fair Market Rent in the Atlanta metropolitan area to aid income eligible families in accessing a broader range of housing opportunities. AHA will, from time to time, use up to 110% of the published 50th percentile Fair Market Rent to provide housing assistance payments in non-impacted (low poverty) areas and “disabled” families.

- AHA plans the strategic use of project-based housing choice vouchers to support AHA’s revitalization efforts and to increase the number of and quality of housing available for low-income, very low-income and extremely low-income families.

E3. Description of Changes in Uses of Funds as a Result of MTW Designation

The designation of AHA as an MTW agency with a block grant of MTW funding has allowed AHA to better manage its funds as we apply funds where they are most effective in allowing us to accomplish our mission of providing quality affordable
housing to the citizens of Atlanta. Under the Moving to Work Block Grant, AHA can now make sound business decisions based on analysis of opportunities and challenges without undue concern over the source of funds to be used. While meeting any remaining statutory requirements, AHA looks at the block grant as a single source of revenue and prioritizes expenditures accordingly.

### Reserve Balance and Projected Adequacy of Reserves

<table>
<thead>
<tr>
<th></th>
<th>Moving to Work</th>
<th>Housing Choice Vouchers (Non-MTW)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Working Capital, June 30, 2004 (Estimated)</td>
<td>$9,381,245</td>
<td>To be determined</td>
</tr>
<tr>
<td>MTW Housing Choice MTW Reserve funding</td>
<td>$9,566,833</td>
<td></td>
</tr>
<tr>
<td>Profit/(loss) from FY 2005 Operations</td>
<td>$881,230</td>
<td>($498,433)</td>
</tr>
<tr>
<td>Working Capital, June 30, 2005</td>
<td>$19,829,308</td>
<td>To be determined</td>
</tr>
</tbody>
</table>

The working capital balances estimated for Moving to Work are sufficient to support operations in FY 2004. AHA is currently working with HUD to determine the funding of program reserves for the Non-MTW vouchers.

**E4. Capital Planning**

**Major Capital Needs and Projects, Estimated Costs and Proposed Timetables**

Capital requirements of the properties have surpassed recent capital funding levels from HUD. AHA has, therefore, established three priorities for capital expenditures: (1) the health and safety of our residents, (2) security and (3) sustaining the viability of our properties until repositioned. The FY 2005 Capital Budget reflects this prioritization. As additional needs are brought to our attention or as AHA repositions its portfolio under MTW, we may adjust our current plans. Additionally, other properties in AHA’s portfolio which are not currently listed may, in the future, require capital expenditures, and AHA may execute these capital projects in FY 2005.
### Planned Expenditures

**Capital Projects in FY05**

Backflow preventers to help bring sewer systems at all properties in accordance with city code.

- Bowen Homes
- Cosby Spears
- East Lake Towers
- Georgia Avenue
- John O. Chiles
- Jonesboro North
- Jonesboro South
- Leila Valley
- Martin Street Plaza
- MLKing Towers
- McDaniel Glenn
- Piedmont

Call down security systems.

- Englewood Manor
- Thomasville Heights
- University Homes
- Bowen Homes
- Jonesboro North and South

Gas appliance repair and replacement

- Bankhead Courts
- Englewood Manor
- McDaniel Glenn
- Thomasville Heights

Priority Life and Safety Issues such as elevator modernization, boiler replacement, emergency generator, electrical work, and balcony repair.

- Antoine Graves
- Bankhead Courts
- Cosby Spears
- Englewood Manor
- Herndon Homes
- John O. Chiles
- Juniper & 10th
- Leila Valley
- Marian Road
- MLKing Tower
- Peachtree Road
- Roosevelt House
- Thomasville Heights
- University Homes

**Total FY05 Capital Project Budget**

13,239,000.00
G. Other Information Required by HUD

The following additional information required by HUD as a part of AHA’s MTW Plan can be found in the Appendices as indicated below:

Submissions required for the receipt of funds (Appendix H)

- Calculation of Performance Funding System Operating Subsidy (52723)
- Calculation of Allowable Utilities Expense Level (52722-A)
- Estimate of Total Required Annual Contributions Section 8 (52673)
- Calculation of Section 8 Subsidy (52672)
- Requisition for Partial Payment of Annual Contributions (52663)
- Annual Statement/Performance and Evaluation Report – Capital Fund Program and Capital Fund Program Replacement Housing Factor

Resident Consultation and Public Comments (Appendix I)

Board Resolution (Appendix J)

- Resolution Adopting the FY 2005 MTW Annual Plan
- Resolution adopting the Statement of Corporate Policies

Required Certifications and other submissions from which the Agency is not exempted by the MTW Agreement (Appendix J)

- PHA Certifications of Compliance with the MTW Plan Requirements
- Certification for a Drug-Free Workplace (Form HUD-50070)
- Certification of Payments to Influence Federal Transactions (Form HUD-50071)
- Disclosure of Lobbying Activities (Standard Form-LLL)
Rebuilding Communities...
Appendices

Appendix A: Boston Study Presentation and Strata Research Summaries

Appendix B: Candidate Communities for Percentage Based Mixed-Population, Elderly Preference Ratio, and Elderly Designation

Appendix C: Family Demographics

Appendix D: Public Housing Inventory Information

Appendix E: Statement of Corporate Policies

Appendix F: Candidate Communities or Properties for Demolition (Complete or Partial), Disposition, or Conversion from Section 9 to Section 8

Appendix G: Housing Choice Administrative Plan

Appendix H: Funding

Appendix I: Resident Consultation and Public Comments

Appendix J: Certifications
Environment Matters:

The Impact of Mixed-Income Neighborhood Revitalization on the Quality of Life of Public Housing Residents

Atlanta Case Study: 1995 – 2001

Key Research Questions

Does Mixed-Income Revitalization Cause a Loss of Housing Assistance for the Poor (i.e. Displacement)?

What Happens to Residents When Housing Projects are Demolished?

Does the Change in Environment Improve the Quality of Life of Public Housing Residents?
Revitalization and Dislocation?

7 year Exit Rate: Non-Rev Projects = 51%  Rev. Projects = 47%

Controlled for:
- Number of Rooms in Housing unit
- Monthly Rent
- Employment Status
- Welfare Dependency
- Total Annual Income
- Disability Status
- Age
- Tenure on Housing Assistance
- Marital Status
- Female Headed Household Status
- Revitalized vs. Non-Revitalized Community

Mixed Income Revitalization had no Statistically Significant Impact on the Loss of Housing Assistance for Families Living in Neighborhoods that were revitalized.
Method

Examined 3 Housing Projects that were Revitalized between 1995-2001 and Compared the Outcome to 3 Projects not Revitalized

Examined the Difference in Outcomes Between Families Residing in Housing Projects, Using Vouchers, or Living in Mixed-Income Communities

What Happens To Residents When Housing Projects Are Demolished and Revitalized?

• 23% Move to Other Public Housing Projects
• 17% Move into Mixed-Income Communities
• 60% Use Housing Vouchers to Move throughout the City
How Extensive is Public Housing Assistance in Atlanta?

1995: 16,355 families and 43,233 individuals
- 67% - Public Housing Projects
- 33% - Housing Vouchers

2001: 18,226 families and 57,592 individuals
- 38% - Public Housing Projects
- 57% - Housing Vouchers
- 5% - Mixed-income Communities

Conclusion

Moving Improved the Socio-Economic Status of the Families and they Gained Access to Higher Quality Neighborhoods.

QLI value

- Families Living in Projects – 1995: 0.30
- Families Living in Projects – 2001: 0.36
- Families Using Vouchers – 2001: 0.46
- Families in Mixed Income – 2001: 0.49

What about Selectivity of the Movers?
How Extensive is Public Housing Assistance?

1995: 16,355 families and 43,233 individuals

67% - Public Housing Projects
33% - Housing Vouchers

2001: 18,226 families and 57,592 individuals

38% - Public Housing Projects
57% - Housing Vouchers
5% - Mixed-income Communities

Large Public Housing Projects Typically Experience Extreme Distress

15 of Atlanta’s 48 housing projects have 500 or more housing units

Some Housing Distress Indicators in 1994

• 88% of units failed minimum standards - unsafe and unsanitary
• 7,100 maintenance work order backlog
• Millions spent unsuccessfully rehabilitating properties
• Federal Government threatened AHA with receivership
Large Public Housing Projects Typically Exhibit Social Distress

Social Indicators in AHA Housing Projects; 1995

- Labor force Participation Rate 13%
- Welfare Dependency Rate 36%
- Female Headed Households 86%
- Long-term housing dependency (16 or more years) 1 in 5 families
- Black residents 94%
- Residents 16 years or younger 49%
- Residents 65 years or older 8%

Large Public Housing Projects Typically Experience High Crime Rates

1993 Crime Report on Techwood/Clark Howell

- Number of Residents 2,170
- Number of property & violent crimes 853
- Number of Police Dispatches 5,654
- Percent of all City Dispatches 4%
- Percent of City Population 0.4%
Mixed-Income Revitalization

East Lake Meadows Before

Attributes of New Community:
- Mixed Income Community: 50/50
- New Charter School
- Early Learning Center
- Public Golf Course
- Golf Academy
- New YMCA
- Major Retail Anchor
- Private Golf Course

After: The Villages of East Lake

What Happens to Families?

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Projects Revitalized</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Clark Howell Homes</td>
<td>478</td>
<td>270</td>
<td>56%</td>
</tr>
<tr>
<td>John Eagan Homes</td>
<td>370</td>
<td>199</td>
<td>54%</td>
</tr>
<tr>
<td>East Lake Meadows</td>
<td>387</td>
<td>179</td>
<td>46%</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>1235</td>
<td>648</td>
<td>53%</td>
</tr>
<tr>
<td><strong>Projects Not Revitalized</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Grady Homes</td>
<td>482</td>
<td>222</td>
<td>46%</td>
</tr>
<tr>
<td>Bowen Homes</td>
<td>577</td>
<td>291</td>
<td>50%</td>
</tr>
<tr>
<td>McDaniel Glen</td>
<td>424</td>
<td>217</td>
<td>51%</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>1483</td>
<td>730</td>
<td>49%</td>
</tr>
</tbody>
</table>
Does Revitalization Cause Displacement?

Examined Exit Rate: Non-Rev Projects = 51%  Rev. Projects = 47%

Controlled for:
- Number of Rooms in Housing unit
- Monthly Rent
- Employment Status
- Welfare Dependency
- Total Annual Income
- Disability Status
- Age
- Years on Housing Assistance
- Marital Status
- Female Headed Household Status
- Revitalized vs. Non-Revitalized Community

No Statistically Significant Difference in the Exit Rate from Housing Assistance for Families Living in Projects that were Revitalized vs. Those Living in Projects not Revitalized

Factors Influencing Housing Retention

Logistic Regression Analysis: Dependent Variable is Prob. of Maintaining Housing Assistance in 2001
Given 1995 Family Attributes
(Universe is 2,718 Families Living in the Six Communities in 1995)

<table>
<thead>
<tr>
<th>1995 Family Attribute</th>
<th>Coefficient</th>
<th>Sig. of Wald Stat</th>
<th>Exp(b) Change in Odds Ratio</th>
</tr>
</thead>
<tbody>
<tr>
<td>No. of Rooms in Apartment</td>
<td>-0.678</td>
<td>* 0.053</td>
<td>0.92</td>
</tr>
<tr>
<td>Monthly Rent</td>
<td>0.600</td>
<td>0.873</td>
<td>1.00</td>
</tr>
<tr>
<td>Primary Income is Wage Earnings</td>
<td>-0.852</td>
<td>0.740</td>
<td>0.95</td>
</tr>
<tr>
<td>Welfare Dependent</td>
<td>0.144</td>
<td>0.200</td>
<td>1.16</td>
</tr>
<tr>
<td>Total Annual Income</td>
<td>0.600</td>
<td>0.807</td>
<td>1.00</td>
</tr>
<tr>
<td>Disabled</td>
<td>0.635</td>
<td>0.782</td>
<td>1.04</td>
</tr>
<tr>
<td>Resided in Revitalized Community</td>
<td>0.115</td>
<td>0.150</td>
<td>1.12</td>
</tr>
<tr>
<td>Years of Age</td>
<td>-0.808 *</td>
<td>0.029</td>
<td>0.99</td>
</tr>
<tr>
<td>Years of Tenure on Housing Asst.</td>
<td>0.627 *</td>
<td>0.000</td>
<td>1.03</td>
</tr>
<tr>
<td>Married</td>
<td>0.804</td>
<td>0.987</td>
<td>1.00</td>
</tr>
<tr>
<td>Female Headed Household</td>
<td>0.473 *</td>
<td>0.002</td>
<td>1.60</td>
</tr>
<tr>
<td>Constant</td>
<td>-0.167</td>
<td>0.511</td>
<td>0.85</td>
</tr>
</tbody>
</table>

* Statistically Significant at .05 level
Where Did Residents of Two Control Groups Relocate?

Origin Status in 1995
- Three Housing Project 1235 families
  - Revitalized
    - 47% Exit
  - Control Group 1

- Three Housing Project 1483 families
  - Not Revitalized
    - 51% Exit
  - Control Group 2

Status in 2001
- 23% Other Projects
- 17% Mixed-Income
- 60% Vouchers
- 63% Same Projects
- 12% Other Projects
- 1% Mixed-Income
- 24% Vouchers

Factors Influencing Housing Loss

Logistic Regression Analysis: Dependent Variable is Prob. of Maintaining Housing Assistance in 2001
Given 1995 Family Attribute
(Universe is 2,718 Families Living in the Six Communities in 1995)

<table>
<thead>
<tr>
<th>1995 Family Attribute</th>
<th>Coefficient</th>
<th>Sig. of Wald Stat</th>
<th>Exp(b) Change in Odds Ratio</th>
</tr>
</thead>
<tbody>
<tr>
<td>No. of Rooms in Apartment</td>
<td>-0.078</td>
<td>0.053</td>
<td>0.92</td>
</tr>
<tr>
<td>Monthly Rent</td>
<td>0.000</td>
<td>0.873</td>
<td>1.00</td>
</tr>
<tr>
<td>Primary Income is Wage Earnings</td>
<td>-0.012</td>
<td>0.740</td>
<td>0.95</td>
</tr>
<tr>
<td>Welfare Dependent</td>
<td>0.144</td>
<td>0.260</td>
<td>1.16</td>
</tr>
<tr>
<td>Total Annual Income</td>
<td>0.000</td>
<td>0.807</td>
<td>1.00</td>
</tr>
<tr>
<td>Disabled</td>
<td>0.035</td>
<td>0.782</td>
<td>1.04</td>
</tr>
<tr>
<td>Resided in Revitalized Community</td>
<td>0.115</td>
<td>0.150</td>
<td>1.12</td>
</tr>
<tr>
<td>Years of Age</td>
<td>-0.008</td>
<td>0.029</td>
<td>0.99</td>
</tr>
<tr>
<td>Years of Tenure on Housing Asst.</td>
<td>0.027</td>
<td>0.000</td>
<td>1.03</td>
</tr>
<tr>
<td>Married</td>
<td>0.004</td>
<td>0.987</td>
<td>1.00</td>
</tr>
<tr>
<td>Female Headed Household</td>
<td>0.473</td>
<td>0.002</td>
<td>1.60</td>
</tr>
<tr>
<td>Constant</td>
<td>-0.167</td>
<td>0.511</td>
<td>0.85</td>
</tr>
</tbody>
</table>

* Statistically Significant at .05 level
Does The Change in Environment Improve The Quality Of Life?

Developed a Quality of Life Index (QLI) for each family and neighborhood (Value varies from 0 to 1)

A. Change in Family Status (FDI)
   - Employment
   - Total Household Income
   - Earned Income
   - Poverty Status
   - Income Gap Ratio

B. Change in Neighborhood Status (NDI)
   - Poverty
   - Welfare Dependency
   - School Attendance
   - Employment
   - School Quality
   - Home Value
   - Racial Diversity
   - Neighborhood Affordability
Does Quality of Life Improve?

Families who Moved from Housing Projects to Vouchers or to Mixed-Income Neighborhoods Experienced Improved Socio-Economic Status and Better Neighborhoods.

- Families Living in Projects – 1995  0.30
- Families Living in Projects – 2001  0.36
- Families Using Vouchers – 2001  0.46
- Families in Mixed Income – 2001  0.49

Environment Matters; but what about Selectivity of the Movers?
## Quality of Life Index Values

<table>
<thead>
<tr>
<th></th>
<th></th>
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<th></th>
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</thead>
<tbody>
<tr>
<td>Employment Index</td>
<td>.22</td>
<td>.30</td>
<td>.43</td>
<td>.45</td>
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<tr>
<td>Family Income Index</td>
<td>.15</td>
<td>.27</td>
<td>.43</td>
<td>.48</td>
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<tr>
<td>a. Household Income Index: 1/3</td>
<td>$5,217</td>
<td>$7,317</td>
<td>$9,567</td>
<td>$9,738</td>
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<tr>
<td>b. Earned Income Index: 2/3</td>
<td>.24</td>
<td>.32</td>
<td>.58</td>
<td>.52</td>
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<tr>
<td>Poverty Status Index</td>
<td>.91</td>
<td>.84</td>
<td>.67</td>
<td>.68</td>
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<tr>
<td>Income Gap Ratio</td>
<td>.57</td>
<td>.52</td>
<td>.53</td>
<td>.46</td>
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</table>
### Quality of Life Index Values

<table>
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<th></th>
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</thead>
<tbody>
<tr>
<td><strong>NDI</strong></td>
<td>.38</td>
<td>.43</td>
<td>.50</td>
<td>.53</td>
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<tr>
<td>Poverty Index</td>
<td>.69</td>
<td>.62</td>
<td>.26</td>
<td>.29</td>
</tr>
<tr>
<td>Welfare Dependency Index</td>
<td>.47</td>
<td>.20</td>
<td>.09</td>
<td>.05</td>
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<tr>
<td>School Attendance Index</td>
<td>.71</td>
<td>.77</td>
<td>.78</td>
<td>.73</td>
</tr>
<tr>
<td>Employment Index</td>
<td></td>
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<td></td>
<td></td>
</tr>
<tr>
<td>% of pop employed</td>
<td>.31</td>
<td>.35</td>
<td>.50</td>
<td>.41</td>
</tr>
<tr>
<td>% of pop in mgmt/prof occups</td>
<td>.11</td>
<td>.16</td>
<td>.20</td>
<td>.29</td>
</tr>
<tr>
<td>Quality of Life Index Values</td>
<td>1995 Origin</td>
<td>2001 Project</td>
<td>2001 Voucher</td>
<td>2001 Mixed Income</td>
</tr>
<tr>
<td>------------------------------</td>
<td>-------------</td>
<td>--------------</td>
<td>--------------</td>
<td>------------------</td>
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<tr>
<td>School Quality Index</td>
<td>.28</td>
<td>.39</td>
<td>.38</td>
<td>.48</td>
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<tr>
<td>Median Home Value</td>
<td>$33,426</td>
<td>$47,448</td>
<td>$84,116</td>
<td>$117,358</td>
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<td>Racial Diversity Index, 1? less diverse</td>
<td>.46</td>
<td>.51</td>
<td>.46</td>
<td>.44</td>
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<tr>
<td>Affordability Index: Rent &lt; 1/3 of income</td>
<td>.41</td>
<td>.33</td>
<td>.09</td>
<td>.18</td>
</tr>
<tr>
<td>QLI</td>
<td>.30</td>
<td>.36</td>
<td>.46</td>
<td>.49</td>
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</table>
Conclusion?

- Environment Matters!!
EXECUTIVE SUMMARY
CENTENNIAL PLACE

- The Primary Impact Area is affected by a convergence of catalysts—primarily Centennial Olympic Park, tax abatement funding, and the redevelopment and revitalization of Centennial Place.

- Centennial Place redevelopment was a significant catalyst for the revitalization of the Primary Impact area. The development first removed a stigma from the area and replaced it with a property and community that is perceived as safe and contributing.

- $356 million dollars of real estate investment have been invested in the PIA in addition to Centennial Place and Centennial Olympic Park.
  - $75.55 million in condominiums
  - $30+ million in apartments by the end of 2003.
  - Estimated $100 million in Office or Mixed Use
  - $147+ million in Hotels
  - Estimated $4+ million in retail development.
  - In addition, the area is anticipating the investment of in excess of $200 million for the Aquarium and the World of Coca Cola.

- The Primary Impact Area appears to have reached a crucial “tipping point” or threshold and is expected to see private investment increases.

- Long term - the value of the property on which Centennial Place is constructed should continue to grow in value in addition to maintaining strong operating performance due to its unique location and amenities.

1 Or are currently underway.
Centennial Place
Economic Impact of the Redevelopment

Executive Summary
Prepared for The Alisias Group
INTRODUCTION

The development of Centennial Place, along with the establishment of Centennial Olympic Park, created a new vitality in the area and provided evidence of community health in the area. This new physical link between Georgia Tech and the World Congress Center, the Georgia Dome and CNN would create a new paradigm within which to view the future of downtown Atlanta.

This study begins to measure the economic impact of the redevelopment and revitalization of Centennial Place on the area initially affected by this investment, defined as the Primary Impact Area. It must be acknowledged that there was multiple causation in the developments and investments that have emerged in this area. Centennial Place was part of a phenomenal convergence of events.

As the Olympic preparation gained momentum, Techwood and Clark Howell Homes were demolished and development of the mixed income community began. Centennial Place finished its first units in 1996. By the end of 1998 new residents were closing on renovated lofts at the former Southeast Gasket Co. Building, now called Gasket City Lofts. (As of October 1998, 25 of the 30 lofts had been presold.2) The lofts at Gasket City Lofts were one of the first residential owned units in the primary impact area with a reported investment of between $4 and $5 million.

Primary Impact Area

Since that time, Centennial Place has continued to grow with the final phase commencing in 2002. Consistently the property has held occupancy in excess of 90% and was at 96% at the time of this study - with no concessions. (Currently concessions are prevalent in the Atlanta multifamily market with rising vacancies in most properties.) Centennial Olympic Park has gained favor with residents from the Atlanta metropolitan area for major events and weekly activities. Three major condominium developments are currently delivering units to new downtown residents with a second new hotel project under construction. The area's first high rise apartment building is targeted for the east side of Centennial Olympic Park with 283 units of luxury apartments and another 200+ units in planning. One of the latest announcements is regarding LeCraw’s nearby new development that will include 308 apartments with 8,500 sq of commercial space.

And last – but certainly not least – is the location announcement of the new $200 million Aquarium and World of Coca-Cola immediately adjacent to the subject property. The Aquarium is seen to be the boost this area needed to fuel the growing momentum.

2 Atlanta Business Chronicle, October, 5, 1998, “Moving on up: Kessler’s going condo”
THE IMPACT

The Primary Impact Area is affected by a convergence of catalysts – primarily
Centennial Olympic Park, tax abatement funding, and the redevelopment
and revitalization of Centennial Place.

A study of the Primary Impact Area including a review of new developments and interviews
with those intimately involved with new investments in this area indicated that the primary
catalysts of new development in this part of Downtown Atlanta were Centennial Olympic
Park, tax abatement funding and the revitalization of Centennial Place. All three were seen to
be critical to the success now being enjoyed within the area and attracting the new Aquarium
and World of Coke. The elimination of any one of these catalysts would have changed the
face of the new development coming into the area.

Centennial Place redevelopment was a significant catalyst for the
redevelopment of the Primary Impact area. The development first removed a
stigma from the area and replaced it with a property and community that is
perceived as safe and contributing.

While Centennial Olympic Park\(^3\) is acknowledged as the unique draw to the area, developers
acknowledge that the redevelopment of Centennial Place kicked off the redevelopment of the
entire area. A large majority of the developers and real estate professionals indicated that the
existing projects would not have been pursued with the presence of the Techwood/Clark
Howell Homes – even if the former projects had been “updated” or further “modernized.”
For most all it would have been the “deal killer,” for others it would have significantly affected
the profile and scope of their development.

Obviously, the addition of an estimated $200 million world-class aquarium and a new World
of Coca-Cola Museum has rapidly fast-forwarded the clock on new investments. We believe it
is fair to question whether those making such an investment would have even considered this
location with the presence of the former Techwood/Clark Howell.

\(^3\) The quality of the management of Centennial Olympic Park was mentioned often as a key to the success of the
park itself.
The Atlanta Housing Authority and HUD (by way of the Hope VI Grants) initially invested $43.6 million in the redevelopment of Centennial Place. This investment was leveraged with contributions of $63.3 million from Developers and other partners. This, along with an additional $15.4 million from the City of Atlanta/TAD saw a total investment of $122,300,000 in the Centennial Place redevelopment.

Centennial Place is now a performing mixed income community. Gone is the stigma and fear that surrounded the former Techwood/Clark Howell homes. Many people selling property in the area are unclear if there are any subsidized units at Centennial Place – and most visitors would likely never ask. While the area has developed more slowly than some anticipated or desired – the area is clearly changing and becoming a community with a solid residential component, along with major event facilities and coming tourist attractions. The volume of dollars invested in this area is substantial at over $356 million since 1996.

$356 million dollars of real estate investment has been invested in the PIA in addition to Centennial Place and Centennial Olympic Park.

- $75.55 million in condominiums
- $30+ million in apartments by the end of 2003.
- Estimated $100 million in Office or Mixed Use
- $147+ million in Hotels
- Estimated $4+ million in retail development.

In addition the area is anticipating the investment of in excess of $200 million for the Aquarium and the World of Coca Cola.

The obvious and most significant long term economic impact is the growth in property taxes. Tax abatement funding utilized in the PIA will affect the revenues for the first ten years burning off during that period. The revenues however, still remain higher than they would have been without new development. According to The Stallings Group:

The (tax) benefit will increase annually as abatements phase out and other new developments are completed and become taxable. For example, upon stabilization the Centennial Place Redevelopment will increase the area’s total Assessed Valuation by an additional 19% or $40,165,000. The City will derive an additional $524,500 in annual Tax Revenues from this effort.

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4 Source: Atlanta Housing Authority

The PIA’s Tax Revenue will increase by non-related developments such as Centennial Hill, Centennial Park West and the Museum Towers Condominiums as those units are sold to private owners.

Real estate development featuring retail and services typically follow the establishment of occupied residential units. AHA led the way in establishing the area as a place to live by its investment in Centennial Place - in a way that a small development could not have achieved.

With three of the condominium projects presently closing on new units - along with the recent announcement of the Aquarium and World of Coca-Cola, we anticipate a surge of retail and service businesses to enter the market over the next three to five years. Conversations with local developers and investors indicated a positive outlook for the areas future – citing the “uncertain future” of the Coca-Cola parcel as one of the hurdles to future development in the area – which is now put to rest.

The Primary Impact Area appears to have reached a crucial “tipping point” or threshold and is expected to see private investment increases.

It is the “ownership” of the investment properties, schools, shops and homes in the area that creates an environment that encourages ongoing reinvestment. The Primary Impact Area of Centennial Place appears to have reached that point, after beginning slowly at first, to hold onto the momentum created by the early public investments (i.e. Centennial Olympic Park, Centennial Place.)

Based on our review of demographic indices we note that homeownership in the PIA has grown from a paltry 15 to a projected 378 by 2003. The presence of residential ownership in this area is essential to create the “ownership” of the area as a community. Homeownership is also important to those who rent as it provides a stabilizing force in the neighborhood. Over 50% of the residential units are now owner occupied.

In turn, retail, which relies on a residential buying base, is slated to follow. Discussions with a leasing broker active in the market revealed that retailers are interested in locating in this market – at solid market rents. While the current slowdown in the overall economy may place downward pressure on these rates – the outlook for new services, shops and restaurants is a positive one. Once again, with AHA controlling the parcel of land slated for the first Neighborhood retail center – we see that this will not only bring services and goods to the doorsteps of the community but could act as a catalyst for additional retail development.

Long term - the value of the property on which Centennial Place is constructed should continue to grow in value in addition to maintaining strong operating performance due to its unique location and amenities.
From an investment standpoint, the value of the Centennial Place property has increased and is forecasted to continue to appreciate as this unique property benefits from the repercussions of the area's revitalization – one that it helped to start.

We have noted what has happened since the revitalization of Centennial Place but it is also important to note what might have been if the development had NOT taken place. Based on our analysis and taking into consideration conversations with real estate professionals active in this market, we conclude that the following are indications of what would be different in this area – if Centennial Place had not been revitalized:

Conservatively - 75% of the housing, currently in the PIA, would not have been developed;
The remaining 25% of housing would have been at a lower price point and/or delayed significantly;
Retail development would have been delayed indefinitely due to the perception of the area and the inadequate number of residential households.
Additionally, without Centennial Place, we anticipate that Centennial Olympic Park (maintained at the same high quality it is today), may have eventually attracted office users into the market as they are less affected by adjacent land uses.
The Aquarium would likely have been located in a different part of the city.

SUMMARY

Centennial Place has been a significant catalyst in the Primary Impact Area and the changes in the pace and profile of investment and growth in the residential population illustrate this. The accompanying study reviews these factors in more detail, measuring them against the median for Georgia, the MSA and the City of Atlanta.
## Critical Success Factors - Overview

### Primary Impact Area

#### Centennial Place

<table>
<thead>
<tr>
<th>Critical Success Factor</th>
<th>1990</th>
<th>2000</th>
<th>Percent Change</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ownership vs. Leasing</td>
<td>1.0%</td>
<td>4.7%</td>
<td>273%</td>
<td>Percentage of occupied households owning their home</td>
</tr>
<tr>
<td>Average Home Values*</td>
<td>0</td>
<td>$275,000</td>
<td>NA</td>
<td>Housing Stock in 1990 was virtually nonexistent in this market</td>
</tr>
<tr>
<td>Number of Housing Units Sold*</td>
<td>0</td>
<td>7</td>
<td>NA</td>
<td>The number of housing units currently coming on the market is in excess of 300.</td>
</tr>
<tr>
<td>Median Household Income</td>
<td>$4,999</td>
<td>unk.</td>
<td></td>
<td>Census figures at tract level not available per date of report</td>
</tr>
<tr>
<td>Population Size</td>
<td>3,918</td>
<td>2,272</td>
<td></td>
<td>Census preceded occupancy of some units at Centennial Place as well as most of the condominium projects.</td>
</tr>
<tr>
<td>Business License*</td>
<td>26</td>
<td>69</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Commercial Inventory*</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Office</td>
<td>1,888,400</td>
<td>2,451,965</td>
<td>30%</td>
<td>Estimated square feet</td>
</tr>
<tr>
<td>Industrial</td>
<td>100,700</td>
<td>100,700</td>
<td>0%</td>
<td>Estimated square feet</td>
</tr>
<tr>
<td>Hotel</td>
<td>0</td>
<td>888</td>
<td></td>
<td>Embassy Suites, Omni, Holiday Inn Express</td>
</tr>
<tr>
<td>Condominiums</td>
<td>12</td>
<td>398</td>
<td>3217%</td>
<td>Includes units still under construction 2002.</td>
</tr>
</tbody>
</table>
KEY CONCEPTS

Historically, the properties in this study and the communities surrounding them have been areas of concentrated poverty, unemployment and disinvestment. The properties themselves were distressed from a physical standpoint exhibited by disrepair and failing systems. This is in contrast to a community that exhibits positive economic health which can be described as a community that is at or above the median for the region with regard to income, employment and housing\(^1\) and experiences ongoing capital reinvestment.

This study is designed to measure and analyze key quantitative factors that would indicate the achievement of each redevelopment as a catalyst for increased private investment in the community - both commercial and residential. Therefore, suggesting the scope of the economic impact of the redevelopments. Key concepts that have been used in this study are discussed below.

\[\text{cataly} \text{st n.}
\]

1. Chem. A substance that alters and esp. increases the rate at which a chemical reaction takes place. 2. One that precipitates a process or event.

Source: The Riverside Webster’s II Dictionary, 1996.

“Healthy” Communities

A sustainable neighborhood, in most instances, is compact and accessible, meaning that it has mixed land uses to which many nearby residents can walk, as well as walking, bicycling or public transportation access to employment.

Confronting Suburban Decline,

Elements of a residential community that reflect economic health include the availability of a variety of housing options, local availability of goods and services, reasonable access to jobs and public transportation, and good public schools. Ongoing financial investment in the community by private entities for commercial and residential needs is essential to the economic sustainability of these areas.

\(^1\) For the purposes of this study, City of Atlanta, Atlanta MSA and Georgia will be the comparative region.
Concentration of poverty occurs due to high concentrations of public housing, deteriorating housing stock, and the lack of financial and community reinvestment. Results of high concentrations of poverty can include increased crime, poor school performance, high drop-out rate of school age children, increasing unemployment, socioeconomic isolation and financial disinvestment.

The effect of concentrated poverty on the residents has been documented by many sociologists and will not be addressed but at a cursory level in this study. It is a deep and complex subject and deserves that level of attention.

The effect of concentrated poverty on the city and the community is seen in many facets of economic health. As an area declines and ceases to attract private reinvestment, tax revenues decrease, buildings are vacated and become eyesores to potential future businesses. Real estate developments and businesses decide to locate in other jurisdictions – taking with them not only the initial investment – but the momentum for growth.

Reinvestment, from both the private and the public sectors, is essential to sustainable communities. Public reinvestment can be a catalyst in increasing private investment by increasing confidence in the future of the neighborhoods. Private investment is represented by private developers, retailers, commercial users and homeowners, as well as improved financing of such properties by mainstream lenders. The presence of reinvestment in the infrastructure and the private domain of a community are essential to its economic health. If an area’s housing values and household incomes are below the median but rising toward the median then that area

2 Keith R. Ihlanfeldt, Breaking the Concentration of Poverty (Atlanta: Research Atlanta, 1998). The Census Bureau defines high-poverty neighborhoods as census tracts where 20 percent or more of the residents live in poverty. Extreme-poverty neighborhoods have 40 percent or more of their residents living in poverty. The most recent tract-level data available for the Atlanta region poverty rates is from the 1990 Census.
would appear to be improving due to the presence of reinvestment.  

**Critical Success Factors**

To determine and measure indications of the economic impact of the AHA redevelopments, we have identified key indicators or factors that reflect a change or growth in the economic success of the neighborhood. We refer to these indicators as Critical Success Factors (CSF). These indicators or factors measure 1) general information such as census data and 2) property specific data such as business licenses, new developments, home sales.

**Threshold Effects**

"Threshold" effects are when a neighborhood reaches a critical value of a certain indicator it triggers more rapid changes in that neighborhood's environment.

The authors of one study that has sought to determine how and when neighborhoods become "unhealthy" have identified several "threshold" effects. That is when a neighborhood reaches a critical value of a certain indicator it may trigger more rapid changes in that neighborhood's environment. Professors Roberto Quercia and George Galster have completed several studies on this subject and have identified several key indicators that they believe can be predictors of an accelerating change in a neighborhood's quality of life and, therefore economic health.

Two of the thresholds that were identified were 1) when the poverty rate exceeds about 54% of the community and/or when 2) the percentage of households who rent versus own exceed 85.5%. We anticipate that many of the communities that are under study will fall above these thresholds. This study will be looking at these and other factors that indicate a trend toward an improving "quality of life" environment – the reverse of the original study - we are seeking to identify trends back toward the thresholds of sustainability.


The "threshold" acts somewhat as a "tipping point," to borrow from the book, The Tipping Point by Malcom Gladwell. Gladwell calls the switchpoint between slow and fast change the "tipping point." In terms of the true economic impact of revitalization, we see the same phenomenon. Gladwell describes a tipping point as one dramatic moment in movement of change when "everything can change all at once."

When an area has been in a continued state of disinvestment or stagnation - it typically takes a substantial economic investment, along with critical change elements to revitalize and change an area's profile. Such investment can come a little at a time, in large dynamic portions or in one major unified plan. Once such investment and change elements hit a "tipping point" or threshold, the momentum of growth increases and continues at an accelerated rate.

Real estate investment, residential and commercial, is driven by demand factors as well as financial hurdles and location. As the factors that drive investment are broad and often immeasurable, it is not possible to assign sole responsibility for investment to a particular criterion or factor. However, we can observe patterns and trends of development to determine the factors which are of most influence.

There are two primary advantages in attracting middle-income households into an area that has fallen into disinvestment and concentrated poverty - fiscal and social. Quercia and Galster identify these two primary benefits that should be expected in attracting and retaining middle income households 1) fiscal conditions (i.e. economic benefit such as property taxes, sales taxes, personal property reinvestment) and 2) by decreasing the

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socioeconomic isolation of previously depressed areas. While their study focused primarily on the central city, these concepts can no doubt be applied to areas of concentrated poverty.\textsuperscript{7} The middle income population is more likely to be able to afford to own a home and therefore provide the stability and influence of homeownership; in addition they establish a population to support additional services and employment that will serve all of the members of the neighborhood. It is significant to note that the City of Atlanta has a distinct shortfall of middle income workers and housing.

\textsuperscript{7} The study “Threshold Effects and the Expected Benefits of Attracting Middle-Income Households to the Central City” referred to the term “inner-city areas” as the urban core areas of concentrated poverty and deterioration.
EXECUTIVE SUMMARY
WEST HIGHLANDS

This study measures the benchmark economic indicators for the neighborhood within which West Highlands is located. These indicators will be measured again at a future date to determine changes or impact that has occurred due to the future redevelopment. For the purpose of this report, this neighborhood or study area is referred to as the Primary Impact Area (PIA).

The Primary Impact Area for West Highlands is bound to the Northwest by the Inman Rail Yards, continues along the westward rail line to James Jackson Parkway and then south along James Jackson Parkway. At the intersection of James Jackson Parkway and Northwest Drive the PIA continues on a direct line to the intersection of Bankhead Highway and Wood Street. The south is bound by Bankhead Highway due east to Marietta Boulevard and finally, continuing north on Marietta Boulevard until intersecting with Perry Boulevard.

MEASURING ECONOMIC IMPACT

Evidence of economic impact in an area known historically for concentrated poverty and disinvestment - or the unwillingness for private capital to invest in a neighborhood - can be determined by measuring changes in particular indicators. In an economically healthy community we expect to find the rate and growth of population and income approaching or exceeding the median, home ownership at a rate typical for the region, home sales that reflect stable appreciation; followed by growth in business licenses, retail and commercial development. In an economically improving area these indicators or Critical Success Factors will reflect a shift toward the median from their previously depressed state. Trends toward the median can indicate a return toward a neighborhood that is attractive to private investment.

To identify the benchmark condition of West Highlands within the Primary Impact Area we considered two time points. First, the condition of the area in 1990 before any change or announcements had occurred, and second, changes that have occurred since West Highlands
was announced using 2000 for most data. At each point we measured the Critical Success Factors, using U.S. Census data and other public information, and identified trends and events as indications of change in the subject Primary Impact Area.

PRIOR TO DEMOLITION

Perry Homes was originally constructed in 1955 on 152.8 acres. There were two components of the Perry Homes Community – Perry Homes and Perry Homes Annex. Perry Homes had 187 barrack style housing buildings with 944 apartments. The Perry Homes Annex had 24 residential buildings and 128 apartments. The location of the development is adjacent to the Inman Rail Yards that made a natural “barrier” from the diversified development that was occurring to the north. The many years of concentrated poverty and crime created an island, isolated from the growth and services of the surrounding Atlanta landscape. An excerpt from the Northwest Atlanta Framework Plan, 2000 paints a picture of the demise of the area.

Bankhead Highway¹, one of the major corridors, was in its splendor during the 1960’s, and the area was stable until the early 1970’s when suburban growth began to drain the area’s vitality. As a result, many longtime businesses closed and were replaced by low-rent businesses; and as population decreased the area began to deteriorate. In fact, over the last 30 years, the entire study area witnessed a steady decline in population, property conditions and the local economy.

Northwest Atlanta Framework Plan, 2000

Home ownership was present in the PIA at a rate 31% in 1990. While the rate of homeownership approached the median for the City of Atlanta and the Atlanta MSA, it was countered by the percentage of residents below the poverty level. The median income in 1990 was just over $12,000 per household.

We found no commercial or retail development occurring at that time point or for most of the following decade.

POST DEMOLITION

The Perry Homes site and the surrounding community have been sorely neglected, lacking reinvestment and new services for a period of at least 30-50 years. According to the Acorn Report from ESRI, the population profile for the Census Tracts included in the PIA fall predominately in three categories - 33.1% Working Class; 21% Distressed Neighborhoods; and 21% Urban Working Families².

¹ Bankhead Highway is located on the south and southwest of the property

² ESRI Acorn reports group populations into categories based on living patterns.

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The demolition of the Perry Home buildings began in 1998; soon after the AHA was first awarded the initial $20 million in HOPE VI funds to revitalize the community. While the former Perry Homes and Annex are gone – the remaining communities are predominately in disrepair. There are a few exceptions to the disrepair - small neighborhoods of one-story single-family homes that reflect a strong sense of community and pride. They are in stark contrast to the surrounding area.

The disparity continues in looking at the apartment complexes within the PIA. Some of the properties can be considered Class C apartments and are operating at or above market occupancy. In contrast, there are some which are dilapidated – with plywood for windows - and totally ignored service and maintenance. New development is limited to two properties - an apartment complex developed by the ANDP and a townhome development developed by Torrey Homes.

Commercial properties are few and reflect a high vacancy rate in comparison to the Metro area. For example, an abandoned shopping center, a small corner market in disrepair, and a grocery store that is locally owned and serves the immediate community. There are a few restaurants and fast food operations – but only one of a regional or national nature.

Early signs of change are emerging in the Impact Area. Population is increasing as residents move into the two new developments; median income increased more than 70%, moving closer to the median for the City of Atlanta³, and home sales are increasing and appreciating.

### TRENDS

<table>
<thead>
<tr>
<th>Critical Success Factor</th>
<th>1990</th>
<th>2000</th>
<th>Percent Change</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Population Size</td>
<td>10,495</td>
<td>8,131</td>
<td>-23%</td>
<td>Census included the demolition of the Perry Homes community, hence the decrease in population.</td>
</tr>
<tr>
<td>Median Household Income</td>
<td>$12,217</td>
<td>$21,084</td>
<td>73%</td>
<td>2000 Census captured the impact of the absence of the Perry Homes residents due to demolition.</td>
</tr>
<tr>
<td>Ownership Vs. Leasing</td>
<td>31%</td>
<td>41%</td>
<td>32%</td>
<td>Percentage of occupied households owning their home. Projected to 2003 to remain fairly static.</td>
</tr>
<tr>
<td>Average Home Sales</td>
<td>$ -</td>
<td>$60,819</td>
<td>N/A</td>
<td>No 1990 data available.</td>
</tr>
<tr>
<td>Number of Housing Units</td>
<td>0</td>
<td>98</td>
<td>N/A</td>
<td>No 1990 data available.</td>
</tr>
<tr>
<td>Business Licenses</td>
<td>96</td>
<td>169</td>
<td>76%</td>
<td></td>
</tr>
<tr>
<td>Commercial Inventory</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Office</td>
<td>29,880</td>
<td>29,880</td>
<td>0%</td>
<td>Estimated square feet.</td>
</tr>
<tr>
<td>Industrial</td>
<td>818,300</td>
<td>818,300</td>
<td>0%</td>
<td>Estimated square feet.</td>
</tr>
<tr>
<td>Retail</td>
<td>243,597</td>
<td>243,597</td>
<td>0%</td>
<td>Estimated square feet.</td>
</tr>
<tr>
<td>Condominiums</td>
<td>1,363</td>
<td>1,686</td>
<td>24%</td>
<td>Estimated square feet.</td>
</tr>
</tbody>
</table>

³ Note: A partial explanation of this increase in the median income is the absence of the Perry Home residents at the 2000 Census.
The population in the PIA has remained virtually flat during the 1990's while the Atlanta MSA experienced 45% growth – and the City of Atlanta 6%. We observed a sharp increase in population between 2000 and projected 2003 of 8% - all occurring since the announcement of the West Highlands Development.

In 1990 Median Household Income in the PIA was just over $12,000. That was almost 50% that of the City of Atlanta ($22,282.) By the 2000 Census the median income had jumped 70% to over $21,000. While this number remains below all of the benchmark medians of the City of Atlanta, Atlanta MSA, and Georgia, - and reflects the removal of the Perry Homes population – it remains a telling sign of economic improvement.

Prior to 1997 and before the announcement of the subject revitalization, home sales in the PIA were minimal, trading often below $50,000. This number jumped by over 80% in 1997 and by 400% from 1991 to 2001. Housing prices have increased an estimated 50 to 70% in the period from 1997 until 2001. Housing prices, however, remain affordable to families at and below the median income for the City of Atlanta. Currently listings in the PIA range between $44,000 and $98,000.

The West Highlands PIA experienced a 35.3% growth in taxable value between 1990 and 2000. The total tax increase was only 20.18%. This is indicative of the lack of demand in this market without redevelopment. After redevelopment of West Highlands, annual taxes, from the subject property, to the City would increase by $5,173,518, or 239% above 2000 levels4. Additionally, property taxes will be realized from surrounding developments which are anticipated to occur concurrently with the subject redevelopment.

PLANS FOR THE FUTURE

The vision for West Highlands is that of “a vibrant, upscale, master-planned, mixed-use, mixed income community where people of all economic strata, races and cultures will live, learn, work, play and raise their families”5. The components of this vision include the key components found in the description of a sustainable neighborhood in the book Confronting Suburban Decline by Lucy and Phillips. The West Highlands master plan includes key catalyst components to spur community revitalization and an ongoing environment of “ownership” and reinvestment.

Charter School
YMCA
Recreational facilities including a golf course, ball fields, and walking paths

4 Source: The Stallings Group, August 2002

5 Supplement to the Perry Homes RRP, Hope VI Grant

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Along with a variety of single and multi-family housing, subsidized and market rate, to serve a broad variety of community residents, the value of drawing the middle income workers in to the city has been studied and the long term benefits are shared among the community members. It cannot be understated that the presence of good educational options for resident’s children is absolutely essential in drawing these families into any community.

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A sustainable neighborhood, in most instances, is compact and accessible, meaning that it has mixed land uses to which many nearby residents can walk, as well as walking, bicycling or public transportation access to employment.


The portion of the Northwest Framework Plan that relate to this specific area appear to be in concert with the objectives of the West Highlands redevelopment. The compounding effect of additional public investment in the surrounding infrastructure, such as sidewalks and medians, along with proper transportation changes, such as the elimination of Bolton Road as a truck route, will only be an advantage to the West Highlands redevelopment.

Discussions with the developers indicate an optimistic outlook on the development, delivery and absorption of residential units. The absorption of the initial housing will be important to watch – as we predict acceleration of sales and rentals upon completion of the first “neighborhood.” Particularly in this day and time – homebuyers are being more careful in waiting to “see” and “touch” what they are getting. Unlike prior market cycles, buyers are less likely to commit to purchases before they are built. In this case the cautiousness will include the progress of the surrounding community revitalization. Progress on the community components is key to maximize the initial absorption.

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Photo 1: Apartment Complex across from West Highlands Site

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Conversations with investors active in the market often mentioned that there were two parcels outside of the West Highlands development that must be addressed to achieve the maximum success of the revitalization. These two were 1) the intersection of Perry Boulevard and Hollywood and 2) the dilapidated property on the north side of Perry Boulevard, adjacent to the Inman Rail yards.

**CONCLUSION**

The PIA of West Highlands is representative of an extreme population disparity. The "Herculean" effort that is being made to revitalize this area is what is required to bring about sustained change and economically healthy communities.

Based on the changes observed in nearby pockets of revitalization, and the tremendous changes being observed around West Highlands – we anticipate that the surrounding communities within the PIA and even the Secondary PIA will experience tremendous economic impact. It is interesting to note that some of the developers are so bullish on the area they are also planning to develop twice as many homes on private land – as in the West Highlands proper.

Economic impact is expected to be observed by:

- Increased property revenue from property currently dormant;
- Retail & Commercial property and business revenues;
- Increase of local commerce;
- Establishment of a strong local resident base;

Unlike Centennial Place, which was a part of a convergence of catalysts – West Highlands is THE catalyst and is the only material change that has been seen in this area for many decades.
### Candidate Communities for Percentage Based Mixed-Population, Elderly Preference Ratio, and Elderly Designation

<table>
<thead>
<tr>
<th>Development Number</th>
<th>Development Name</th>
</tr>
</thead>
<tbody>
<tr>
<td>GA006011</td>
<td>Antoine Graves</td>
</tr>
<tr>
<td>GA006026</td>
<td>Antoine Graves Annex</td>
</tr>
<tr>
<td>GA006054</td>
<td>Barge Road</td>
</tr>
<tr>
<td>GA006047</td>
<td>Cheshire Bridge Road</td>
</tr>
<tr>
<td>GA006024</td>
<td>Cosby Spears Towers</td>
</tr>
<tr>
<td>GA006030</td>
<td>East Lake Towers</td>
</tr>
<tr>
<td>GA006025</td>
<td>Georgia Avenue</td>
</tr>
<tr>
<td>GA006053</td>
<td>Hightower Manor</td>
</tr>
<tr>
<td>GA006013</td>
<td>John O. Chiles</td>
</tr>
<tr>
<td>GA006043</td>
<td>Juniper &amp; 10th</td>
</tr>
<tr>
<td>GA006052</td>
<td>Marian Road</td>
</tr>
<tr>
<td>GA006058</td>
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<td>GA006027</td>
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## Appendix C

### Demographic Information*

**C-1  Heads of Households Served – Unit Bedroom Size Profile as of 12/31/03**

<table>
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<th>PROGRAM</th>
<th>Total Units</th>
<th>Percent Total</th>
<th>BEDROOM SIZE</th>
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<th>1BR</th>
<th>2BR</th>
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<td>PHA**</td>
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<tr>
<td>High-Rise</td>
<td>3,046</td>
<td>17.64%</td>
<td>752</td>
<td>24.69%</td>
<td>2,279</td>
<td>74.82%</td>
<td>14</td>
<td>0.46%</td>
</tr>
<tr>
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<td>4,202</td>
<td>24.34%</td>
<td>53</td>
<td>1.26%</td>
<td>765</td>
<td>18.21%</td>
<td>1,530</td>
<td>36.41%</td>
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<td>1,226</td>
<td>7.10%</td>
<td>0</td>
<td>0.00%</td>
<td>209</td>
<td>17.05%</td>
<td>665</td>
<td>54.24%</td>
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<tr>
<td>PHA Total</td>
<td>8,474</td>
<td>49.08%</td>
<td>805</td>
<td>9.50%</td>
<td>3,253</td>
<td>38.39%</td>
<td>2,209</td>
<td>26.07%</td>
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<tr>
<td>Housing Choice***</td>
<td>8,792</td>
<td>50.92%</td>
<td>3</td>
<td>0.03%</td>
<td>839</td>
<td>9.54%</td>
<td>3,737</td>
<td>42.50%</td>
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<tr>
<td>HC Total</td>
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<td>50.92%</td>
<td>3</td>
<td>0.03%</td>
<td>839</td>
<td>9.54%</td>
<td>3,737</td>
<td>42.50%</td>
</tr>
<tr>
<td>Total</td>
<td>17,266</td>
<td>100.00%</td>
<td>808</td>
<td>4.68%</td>
<td>4,092</td>
<td>23.70%</td>
<td>5,946</td>
<td>34.44%</td>
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**Public Housing Assisted.  
***Non-MTW vouchers are not included in these statistics.**

**C-2  Heads of Households Served – Income Profile as of 12/31/03**

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<th>Total</th>
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<th>&lt; 30% of AMI</th>
<th>30-50% of AMI</th>
<th>50-80% of AMI</th>
<th>&gt; 80% of AMI</th>
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<tr>
<td>High-Rise</td>
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<td>95.24%</td>
<td>127</td>
<td>4.17%</td>
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<tr>
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<td>74.06%</td>
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<td>7,760</td>
<td>91.57%</td>
<td>616</td>
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<td>80.73%</td>
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<td>18.38%</td>
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<tr>
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<td>80.73%</td>
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<td>18.38%</td>
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**Public Housing Assisted.  
***Non-MTW vouchers are not included in these statistics.**

*All information provided within this section is as of 12/31/2003.*
### Heads of Households Served - Racial Profile as of 12/31/03

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<td>578</td>
<td>6.82%</td>
<td>7,828</td>
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#### Housing Choice**

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<th>Non-Hispanic</th>
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<tr>
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<td>1.77%</td>
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<tr>
<td>High-Rise</td>
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<tr>
<td>PHA Total</td>
<td>8,474</td>
<td>150</td>
<td>1.77%</td>
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#### Housing Choice**

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<th>Hispanic</th>
<th>Non-Hispanic</th>
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<tr>
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<td>188</td>
<td>1.09%</td>
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*Public Housing Assisted.
**Non-MTW vouchers are not included in these statistics.
### heads of households served – racial and ethnic profile (pha by development) as of 12/ 31/ 03

#### Program

<table>
<thead>
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<th>Non-Hispanic</th>
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*C-4

**FY 2004 Area Median Income (AMI) Limits By Household Size as of 12/ 31/ 03**

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<tr>
<th>HOUSEHOLD SIZE</th>
<th>FY 2004 INCOME LIMITS</th>
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<tr>
<td></td>
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<tr>
<td>1</td>
<td>$14,950</td>
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<td>$24,800</td>
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<td>7</td>
<td>$26,500</td>
</tr>
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<td>8</td>
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*Public Housing Assisted.
**Non-MTW vouchers are not included in these statistics.
### Heads of Households Served - Income Profile by AMI (PHA by Development): 12/31/03

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<thead>
<tr>
<th>PROGRAM</th>
<th>INCOME RANGES</th>
<th>Total</th>
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<tbody>
<tr>
<td></td>
<td>&lt; 30% of AMI</td>
<td>30-50% of AMI</td>
</tr>
<tr>
<td></td>
<td>#</td>
<td>%</td>
</tr>
<tr>
<td>PHA*</td>
<td></td>
<td></td>
</tr>
<tr>
<td>High-Rise</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Antoine Graves</td>
<td>204</td>
<td>97.61%</td>
</tr>
<tr>
<td>Antoine Graves Annex</td>
<td>98</td>
<td>98.00%</td>
</tr>
<tr>
<td>Barge Road</td>
<td>115</td>
<td>89.84%</td>
</tr>
<tr>
<td>Cheshire Bridge Road</td>
<td>152</td>
<td>93.83%</td>
</tr>
<tr>
<td>Cosby Spears Towers</td>
<td>269</td>
<td>97.82%</td>
</tr>
<tr>
<td>East Lake Towers</td>
<td>138</td>
<td>93.24%</td>
</tr>
<tr>
<td>Georgia Avenue</td>
<td>77</td>
<td>97.47%</td>
</tr>
<tr>
<td>Hightower Manor</td>
<td>115</td>
<td>91.27%</td>
</tr>
<tr>
<td>John O. Chiles</td>
<td>234</td>
<td>93.60%</td>
</tr>
<tr>
<td>Juniper - 10th St.</td>
<td>140</td>
<td>95.89%</td>
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<tr>
<td>Marian Apartments</td>
<td>233</td>
<td>97.49%</td>
</tr>
<tr>
<td>Marietta Road</td>
<td>114</td>
<td>89.06%</td>
</tr>
<tr>
<td>Martin Luther King Towers</td>
<td>146</td>
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<tr>
<td>Palmer House</td>
<td>237</td>
<td>97.13%</td>
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<tr>
<td>Peachtree Road</td>
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<td>92.39%</td>
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<td>Piedmont Road</td>
<td>198</td>
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<tr>
<td>Roosevelt House</td>
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<tr>
<td><strong>High-Rise Total</strong></td>
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<tr>
<td>Family</td>
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</tr>
<tr>
<td>Bankhead Courts</td>
<td>349</td>
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<tr>
<td>Bowen Homes</td>
<td>586</td>
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<tr>
<td>Englewood Manor</td>
<td>275</td>
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</tr>
<tr>
<td>Gilbert Gardens</td>
<td>179</td>
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</tr>
<tr>
<td>Grady Homes</td>
<td>443</td>
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<tr>
<td>Herndon Homes</td>
<td>259</td>
<td>93.50%</td>
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<td>Hollywood Courts</td>
<td>188</td>
<td>95.92%</td>
</tr>
<tr>
<td>John Hope</td>
<td>5</td>
<td>83.33%</td>
</tr>
<tr>
<td>Jonesboro North</td>
<td>91</td>
<td>94.79%</td>
</tr>
<tr>
<td>Jonesboro South</td>
<td>152</td>
<td>97.44%</td>
</tr>
<tr>
<td>Leila Valley</td>
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</tr>
<tr>
<td>Martin Street Plaza</td>
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<td>81.03%</td>
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<tr>
<td>McDaniel Glenn</td>
<td>389</td>
<td>96.77%</td>
</tr>
<tr>
<td>Thomasville Heights</td>
<td>320</td>
<td>94.67%</td>
</tr>
<tr>
<td>University Homes</td>
<td>472</td>
<td>96.33%</td>
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<tr>
<td>U-Rescue Villa</td>
<td>62</td>
<td>91.18%</td>
</tr>
<tr>
<td>Westminster</td>
<td>27</td>
<td>87.10%</td>
</tr>
<tr>
<td><strong>Family Total</strong></td>
<td>3,951</td>
<td>94.03%</td>
</tr>
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</table>

*Public Housing Assisted.

**Non-MTW vouchers are not included in these statistics.
### INCOME RANGES

<table>
<thead>
<tr>
<th>PROGRAM</th>
<th>&lt; 30% of AMI</th>
<th>30-50% of AMI</th>
<th>50-80% of AMI</th>
<th>&gt; 80% of AMI</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>#</td>
<td>%</td>
<td>#</td>
<td>%</td>
<td>#</td>
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<tr>
<td>PHA</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mixed-Income</td>
<td></td>
<td></td>
<td></td>
<td></td>
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<td>66</td>
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<td>16</td>
<td>19.28%</td>
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<tr>
<td>Ashley Terrace at West End I</td>
<td>22</td>
<td>66.67%</td>
<td>11</td>
<td>35.48%</td>
<td>0</td>
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<tr>
<td>Centennial Place I-IV</td>
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<td>66.22%</td>
<td>87</td>
<td>29.39%</td>
<td>12</td>
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<td>Columbia Village</td>
<td>22</td>
<td>73.33%</td>
<td>7</td>
<td>23.33%</td>
<td>1</td>
</tr>
<tr>
<td>Magnolia Park I &amp; II</td>
<td>121</td>
<td>77.56%</td>
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<td>20.51%</td>
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<tr>
<td>Summerdale Commons I &amp; II</td>
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<td>84.93%</td>
<td>11</td>
<td>15.07%</td>
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</tr>
<tr>
<td>Village at Castleberry Hill I &amp; II</td>
<td>142</td>
<td>79.78%</td>
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<tr>
<td>Villages at Carver I &amp; II</td>
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<td>76.36%</td>
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<td>22.73%</td>
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<tr>
<td>Villages of East Lake I &amp; II</td>
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<td>72.28%</td>
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<td>26.22%</td>
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<td><strong>Mixed-Income Total</strong></td>
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<td>74.06%</td>
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<td>91.57%</td>
<td>616</td>
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### Housing Choice**

<table>
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<td></td>
<td>Studio</td>
</tr>
<tr>
<td></td>
<td>#</td>
<td>%</td>
</tr>
<tr>
<td><strong>PHA</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>High-Rise</td>
<td>2,817</td>
<td>1,160</td>
</tr>
<tr>
<td>Family</td>
<td>10,870</td>
<td>104</td>
</tr>
<tr>
<td>Mixed-Income</td>
<td>2,469</td>
<td>49</td>
</tr>
<tr>
<td><strong>PHA Total</strong></td>
<td>16,156</td>
<td>1,133</td>
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</tbody>
</table>

**Note:** Housing Choice does not currently maintain Bedroom Profile data for waiting list applicants.

*Public Housing Assisted.
## C-9 Public Housing Assisted and Housing Choice Waiting List Data – Racial Profile as of 12/ 31/ 03

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<td>%</td>
<td>#</td>
<td>%</td>
</tr>
<tr>
<td><strong>PHA</strong>*</td>
<td>16,156</td>
<td>384</td>
<td>2.38%</td>
<td>15,745</td>
<td>97.46%</td>
</tr>
<tr>
<td>High-Rise</td>
<td>2,817</td>
<td>289</td>
<td>10.26%</td>
<td>2,509</td>
<td>89.07%</td>
</tr>
<tr>
<td></td>
<td></td>
<td>14</td>
<td>0.50%</td>
<td>5</td>
<td>0.18%</td>
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<tr>
<td>Family</td>
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<td>0.52%</td>
<td>10,806</td>
<td>99.41%</td>
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<td>0.02%</td>
<td>6</td>
<td>0.06%</td>
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<tr>
<td>Mixed-Income</td>
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<td>39</td>
<td>1.58%</td>
<td>2,430</td>
<td>98.42%</td>
</tr>
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<td></td>
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<td>0</td>
<td>0.00%</td>
<td>0</td>
<td>0.00%</td>
</tr>
<tr>
<td><strong>PHA Total</strong></td>
<td>16,156</td>
<td>384</td>
<td>2.38%</td>
<td>15,745</td>
<td>97.46%</td>
</tr>
<tr>
<td><strong>Housing Choice</strong></td>
<td>21,387</td>
<td>1,006</td>
<td>4.70%</td>
<td>20,129</td>
<td>94.12%</td>
</tr>
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<td><strong>HC Total</strong></td>
<td>21,387</td>
<td>1,006</td>
<td>4.70%</td>
<td>20,129</td>
<td>94.12%</td>
</tr>
<tr>
<td><strong>Total</strong></td>
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<td>3.70%</td>
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<td>95.55%</td>
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</table>

*Public Housing Assisted.

**Non-MTW vouchers are not included in these statistics.

## C-10 Public Housing Assisted and Housing Choice Waiting List Data – Income Profile as of 12/ 31/ 03

<table>
<thead>
<tr>
<th>PROGRAM</th>
<th>Total</th>
<th>&lt; 30% of AMI</th>
<th>30-50% of AMI</th>
<th>50-80% of AMI</th>
<th>&gt; 80% of AMI</th>
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<tbody>
<tr>
<td></td>
<td></td>
<td>#</td>
<td>%</td>
<td>#</td>
<td>%</td>
</tr>
<tr>
<td><strong>PHA</strong>*</td>
<td>16,156</td>
<td>13,905</td>
<td>86.07%</td>
<td>1,675</td>
<td>10.37%</td>
</tr>
<tr>
<td>High-Rise</td>
<td>2,817</td>
<td>2,735</td>
<td>97.09%</td>
<td>70</td>
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<td></td>
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<td>2.84%</td>
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<td>0.00%</td>
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<td>0.00%</td>
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<td>156</td>
<td>6.32%</td>
<td>0</td>
<td>0.00%</td>
</tr>
<tr>
<td><strong>PHA Total</strong></td>
<td>16,156</td>
<td>13,905</td>
<td>86.07%</td>
<td>1,675</td>
<td>10.37%</td>
</tr>
<tr>
<td><strong>Housing Choice</strong></td>
<td>21,387</td>
<td>19,733</td>
<td>92.27%</td>
<td>1,478</td>
<td>6.91%</td>
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<tr>
<td><strong>HC Total</strong></td>
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<td>19,733</td>
<td>92.27%</td>
<td>1,478</td>
<td>6.91%</td>
</tr>
<tr>
<td><strong>Total</strong></td>
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<td>33,638</td>
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<td>8.40%</td>
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</table>

*Public Housing Assisted.

**Non-MTW vouchers are not included in these statistics.
## C-11 Public Housing Assisted and Housing Choice Waiting List Data – Racial Profile (PHA by Development) as of 12/31/03

<table>
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<th>RACE</th>
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<tr>
<td></td>
<td>#</td>
<td></td>
</tr>
<tr>
<td>PHA*</td>
<td></td>
<td></td>
</tr>
<tr>
<td>High-Rise</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Antoine Graves</td>
<td>6</td>
<td>2.38%</td>
</tr>
<tr>
<td>Antoine Graves Annex</td>
<td>6</td>
<td>3.19%</td>
</tr>
<tr>
<td>Barge Road</td>
<td>1</td>
<td>1.03%</td>
</tr>
<tr>
<td>Cheshire Bridge Road</td>
<td>43</td>
<td>27.74%</td>
</tr>
<tr>
<td>Cosby Spears Towers</td>
<td>23</td>
<td>9.83%</td>
</tr>
<tr>
<td>East Lake Towers</td>
<td>3</td>
<td>1.32%</td>
</tr>
<tr>
<td>Georgia Avenue</td>
<td>1</td>
<td>1.52%</td>
</tr>
<tr>
<td>Hightower Manor</td>
<td>1</td>
<td>0.59%</td>
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<tr>
<td>John O. Chiles</td>
<td>3</td>
<td>1.79%</td>
</tr>
<tr>
<td>Juniper - 10th St.</td>
<td>47</td>
<td>15.41%</td>
</tr>
<tr>
<td>Marian Apartments</td>
<td>50</td>
<td>31.25%</td>
</tr>
<tr>
<td>Marietta Road</td>
<td>11</td>
<td>18.64%</td>
</tr>
<tr>
<td>Martin Luther King Towers</td>
<td>0</td>
<td>0.00%</td>
</tr>
<tr>
<td>Palmer House</td>
<td>4</td>
<td>2.50%</td>
</tr>
<tr>
<td>Peachtree Road</td>
<td>62</td>
<td>21.99%</td>
</tr>
<tr>
<td>Piedmont Road</td>
<td>25</td>
<td>25.77%</td>
</tr>
<tr>
<td>Roosevelt House</td>
<td>3</td>
<td>2.11%</td>
</tr>
<tr>
<td>High-Rise Total</td>
<td><strong>289</strong></td>
<td><strong>10.26%</strong></td>
</tr>
<tr>
<td>Family</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Bankhead Courts</td>
<td>0</td>
<td>0.00%</td>
</tr>
<tr>
<td>Bowen Homes</td>
<td>4</td>
<td>0.29%</td>
</tr>
<tr>
<td>Englewood Manor</td>
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<td>0.83%</td>
</tr>
<tr>
<td>Gilbert Gardens</td>
<td>2</td>
<td>0.39%</td>
</tr>
<tr>
<td>Grady Homes</td>
<td>6</td>
<td>0.31%</td>
</tr>
<tr>
<td>Herndon Homes</td>
<td>8</td>
<td>0.95%</td>
</tr>
<tr>
<td>Hollywood Courts</td>
<td>1</td>
<td>0.68%</td>
</tr>
<tr>
<td>John Hope Model Building</td>
<td>0</td>
<td>0.00%</td>
</tr>
<tr>
<td>Jonesboro North</td>
<td>2</td>
<td>0.83%</td>
</tr>
<tr>
<td>Jonesboro South</td>
<td>0</td>
<td>0.00%</td>
</tr>
<tr>
<td>Leila Valley</td>
<td>1</td>
<td>0.21%</td>
</tr>
<tr>
<td>Martin Street Plaza</td>
<td>1</td>
<td>0.21%</td>
</tr>
<tr>
<td>McDaniels Glenn</td>
<td>6</td>
<td>0.52%</td>
</tr>
<tr>
<td>Thomasville Heights</td>
<td>3</td>
<td>0.43%</td>
</tr>
<tr>
<td>University Homes</td>
<td>4</td>
<td>0.48%</td>
</tr>
<tr>
<td>U-Rescue Villa</td>
<td>8</td>
<td>2.50%</td>
</tr>
<tr>
<td>Westminster</td>
<td>7</td>
<td>3.78%</td>
</tr>
<tr>
<td>Family Total</td>
<td><strong>56</strong></td>
<td><strong>0.52%</strong></td>
</tr>
</tbody>
</table>

*Public Housing Assisted.

**Non-MTW vouchers are not included in these statistics.
<table>
<thead>
<tr>
<th>PROGRAM</th>
<th>Caucasian</th>
<th>African American</th>
<th>American Indian</th>
<th>Asian</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>#</td>
<td>%</td>
<td>#</td>
<td>%</td>
<td>#</td>
</tr>
<tr>
<td><strong>PHA</strong></td>
<td></td>
<td></td>
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<td></td>
<td></td>
</tr>
<tr>
<td><strong>Mixed-Income</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Ashley Court at Cascade I &amp; II</td>
<td>0</td>
<td>0.00%</td>
<td>124</td>
<td>100.00%</td>
<td>0</td>
</tr>
<tr>
<td>Ashley Terrace at West End I</td>
<td>0</td>
<td>0.00%</td>
<td>34</td>
<td>100.00%</td>
<td>0</td>
</tr>
<tr>
<td>Centennial Place I-IV</td>
<td>3</td>
<td>1.32%</td>
<td>225</td>
<td>98.68%</td>
<td>0</td>
</tr>
<tr>
<td>Columbia Village</td>
<td>0</td>
<td>0.00%</td>
<td>120</td>
<td>100.00%</td>
<td>0</td>
</tr>
<tr>
<td>Magnolia Park I &amp; II</td>
<td>0</td>
<td>0.00%</td>
<td>41</td>
<td>100.00%</td>
<td>0</td>
</tr>
<tr>
<td>Summerdale Commons I &amp; II</td>
<td>1</td>
<td>0.49%</td>
<td>202</td>
<td>99.51%</td>
<td>0</td>
</tr>
<tr>
<td>Village at Castleberry Hill I &amp; II</td>
<td>0</td>
<td>0.00%</td>
<td>113</td>
<td>100.00%</td>
<td>0</td>
</tr>
<tr>
<td>Villages at Carver I &amp; II</td>
<td>35</td>
<td>3.23%</td>
<td>1,047</td>
<td>96.77%</td>
<td>0</td>
</tr>
<tr>
<td>Villages of East Lake I &amp; II</td>
<td>0</td>
<td>0.00%</td>
<td>524</td>
<td>100.00%</td>
<td>0</td>
</tr>
<tr>
<td><strong>Mixed-Income Total</strong></td>
<td>39</td>
<td>1.58%</td>
<td>2,430</td>
<td>98.42%</td>
<td>0</td>
</tr>
<tr>
<td><strong>PHA Totals</strong></td>
<td>384</td>
<td>2.38%</td>
<td>15,745</td>
<td>97.46%</td>
<td>16</td>
</tr>
<tr>
<td><strong>Housing Choice</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Housing Choice Totals</strong></td>
<td>1,006</td>
<td>4.70%</td>
<td>20,129</td>
<td>94.12%</td>
<td>194</td>
</tr>
<tr>
<td><strong>Grand Total</strong></td>
<td>1,390</td>
<td>3.70%</td>
<td>35,874</td>
<td>95.55%</td>
<td>210</td>
</tr>
</tbody>
</table>

*Public Housing Assisted.

**Non-MTW vouchers are not included in these statistics.
**APPENDIX D**

**Public Housing Inventory Information***

D-1 Number of units in Inventory as of 6/30/03

<table>
<thead>
<tr>
<th>PROGRAM</th>
<th>Total Units</th>
<th>BEDROOM SIZE</th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Studio</td>
<td>1BR</td>
<td>2BR</td>
<td>3BR</td>
<td>4+BR</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>#</td>
<td>%</td>
<td>#</td>
<td>%</td>
<td>#</td>
<td>%</td>
</tr>
<tr>
<td>PHA**</td>
<td>8,725</td>
<td>818</td>
<td>9.38%</td>
<td>3,293</td>
<td>37.74%</td>
<td>2,305</td>
<td>26.42%</td>
</tr>
<tr>
<td>High-Rise</td>
<td>3,082</td>
<td>764</td>
<td>24.79%</td>
<td>2,302</td>
<td>74.69%</td>
<td>15</td>
<td>0.49%</td>
</tr>
<tr>
<td>Family</td>
<td>4,396</td>
<td>54</td>
<td>1.23%</td>
<td>778</td>
<td>17.70%</td>
<td>1,614</td>
<td>36.72%</td>
</tr>
<tr>
<td>Mixed-Income</td>
<td>1,247</td>
<td>0</td>
<td>0.00%</td>
<td>213</td>
<td>17.08%</td>
<td>676</td>
<td>54.21%</td>
</tr>
<tr>
<td>PHA Total</td>
<td></td>
<td>818</td>
<td>9.38%</td>
<td>3,293</td>
<td>37.74%</td>
<td>2,305</td>
<td>26.42%</td>
</tr>
</tbody>
</table>

**Public Housing Assisted.

*All information provided within this section is as of 6/30/2003. With the exception of Rents Uncollected and Occupancy Rates, the information contained within this section was certified by AHA and confirmed by HUD as a part of Indicator No. 3 (MASS – Management Assessment Sub-System) of AHA’s fiscal year 2003 Public Housing Assessment System (PHAS) submission.
## D-2 Public Housing Assisted Communities - Occupancy Levels as of 6/30/03

<table>
<thead>
<tr>
<th>Development Number</th>
<th>Development</th>
<th>2003 Adjusted %*</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>High-Rise</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>GA006011</td>
<td>Antoine Graves</td>
<td>100.00%</td>
</tr>
<tr>
<td>GA006026</td>
<td>Antoine Graves Annex</td>
<td>100.00%</td>
</tr>
<tr>
<td>GA006054</td>
<td>Barge Road</td>
<td>99.22%</td>
</tr>
<tr>
<td>GA006003A</td>
<td>Capitol Homes</td>
<td>N/A**</td>
</tr>
<tr>
<td>GA006047</td>
<td>Cheshire Bridge Road</td>
<td>100.00%</td>
</tr>
<tr>
<td>GA006024</td>
<td>Cosby Spears Towers</td>
<td>97.16%</td>
</tr>
<tr>
<td>GA006030</td>
<td>East Lake Towers</td>
<td>97.97%</td>
</tr>
<tr>
<td>GA006025</td>
<td>Georgia Avenue</td>
<td>100.00%</td>
</tr>
<tr>
<td>GA006053</td>
<td>Hightower Manor</td>
<td>99.22%</td>
</tr>
<tr>
<td>GA006013</td>
<td>John O. Chiles</td>
<td>99.20%</td>
</tr>
<tr>
<td>GA006043</td>
<td>Juniper - 10th St.</td>
<td>98.64%</td>
</tr>
<tr>
<td>GA006052</td>
<td>Marian Apartments</td>
<td>99.58%</td>
</tr>
<tr>
<td>GA006058</td>
<td>Marietta Road</td>
<td>99.22%</td>
</tr>
<tr>
<td>GA006016</td>
<td>Martin Luther King Towers</td>
<td>100.00%</td>
</tr>
<tr>
<td>GA006014</td>
<td>Palmer House</td>
<td>99.60%</td>
</tr>
<tr>
<td>GA006045</td>
<td>Peachtree Road</td>
<td>100.00%</td>
</tr>
<tr>
<td>GA006048</td>
<td>Piedmont Road</td>
<td>98.55%</td>
</tr>
<tr>
<td>GA006027</td>
<td>Roosevelt House</td>
<td>99.61%</td>
</tr>
<tr>
<td><strong>Family</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>GA006028</td>
<td>Bankhead Courts</td>
<td>97.66%</td>
</tr>
<tr>
<td>GA006012</td>
<td>Bowen Homes</td>
<td>97.35%</td>
</tr>
<tr>
<td>GA006023</td>
<td>Englewood Manor</td>
<td>97.83%</td>
</tr>
<tr>
<td>GA006021</td>
<td>Gilbert Gardens</td>
<td>100.00%</td>
</tr>
<tr>
<td>GA006004</td>
<td>Grady Homes</td>
<td>100.00%</td>
</tr>
<tr>
<td>GA006005R2</td>
<td>Herndon Homes</td>
<td>98.92%</td>
</tr>
<tr>
<td>GA006020</td>
<td>Hollywood Courts</td>
<td>98.99%</td>
</tr>
<tr>
<td>GA006002</td>
<td>John Hope Model Building***</td>
<td>100.00%</td>
</tr>
<tr>
<td>GA006032</td>
<td>Jonesboro North</td>
<td>92.93%</td>
</tr>
<tr>
<td>GA006031</td>
<td>Jonesboro South</td>
<td>93.08%</td>
</tr>
<tr>
<td>GA006029</td>
<td>Leila Valley</td>
<td>99.19%</td>
</tr>
<tr>
<td>GA006056</td>
<td>Martin Street Plaza</td>
<td>100.00%</td>
</tr>
<tr>
<td>GA006016</td>
<td>McDaniel Glenn</td>
<td>97.23%</td>
</tr>
<tr>
<td>GA006017</td>
<td>Thomasville Heights</td>
<td>98.84%</td>
</tr>
<tr>
<td>GA006010</td>
<td>University Homes</td>
<td>98.79%</td>
</tr>
<tr>
<td>GA006024</td>
<td>U-Rescue Villa</td>
<td>100.00%</td>
</tr>
<tr>
<td>GA006044</td>
<td>Westminster</td>
<td>96.88%</td>
</tr>
</tbody>
</table>

*Adjusted indicates that AHA has excluded HUD approved units out of occupancy, units undergoing modernization, and vacant units due to circumstances and actions beyond AHA's control due to: litigation, laws, changing market conditions, natural disasters, insufficient funding, or casualty losses.

**Capitol Homes residents were relocated by June 30, 2003 due to property revitalization.

***Six-unit residential building remaining from revitalized John Hope Homes.
<table>
<thead>
<tr>
<th>Development Number</th>
<th>Development</th>
<th>2003 Adjusted %*</th>
</tr>
</thead>
<tbody>
<tr>
<td>GA006083</td>
<td>Ashley Court at Cascade I &amp; II</td>
<td>97.70%</td>
</tr>
<tr>
<td>GA006084</td>
<td>Ashley Terrace at West End I</td>
<td>97.06%</td>
</tr>
<tr>
<td>GA006077</td>
<td>Centennial Place I</td>
<td>98.67%</td>
</tr>
<tr>
<td>GA006077A</td>
<td>Centennial Place II</td>
<td></td>
</tr>
<tr>
<td>GA006077B</td>
<td>Centennial Place III</td>
<td></td>
</tr>
<tr>
<td>GA006077C</td>
<td>Centennial Place IV</td>
<td></td>
</tr>
<tr>
<td>GA006081</td>
<td>Columbia Village</td>
<td>93.33%</td>
</tr>
<tr>
<td>GA006069</td>
<td>Magnolia Park I</td>
<td>98.75%</td>
</tr>
<tr>
<td>GA006086</td>
<td>Magnolia Park II</td>
<td></td>
</tr>
<tr>
<td>GA006070</td>
<td>Summerdale Commons I</td>
<td>95.95%</td>
</tr>
<tr>
<td>GA006079</td>
<td>Summerdale Commons II</td>
<td></td>
</tr>
<tr>
<td>GA006061</td>
<td>Village at Castleberry Hill I</td>
<td>97.22%</td>
</tr>
<tr>
<td>GA006080</td>
<td>Village at Castleberry Hill II</td>
<td></td>
</tr>
<tr>
<td>GA006085</td>
<td>Villages at Carver I</td>
<td>92.73%</td>
</tr>
<tr>
<td>GA006065</td>
<td>Villages of East Lake I</td>
<td>100.00%</td>
</tr>
<tr>
<td>GA006078</td>
<td>Villages of East Lake II</td>
<td></td>
</tr>
<tr>
<td><strong>Average</strong></td>
<td></td>
<td><strong>98.49%</strong></td>
</tr>
</tbody>
</table>

*Adjusted indicates that AHA has excluded HUD approved units out of occupancy, units undergoing modernization, and vacant units due to circumstances and actions beyond AHA’s control due to: litigation, laws, changing market conditions, natural disasters, insufficient funding, or casualty losses.
<table>
<thead>
<tr>
<th>Development Number</th>
<th>Development</th>
<th>2003 % of Rents Uncollected</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>High-Rise</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>GA006011</td>
<td>Antoine Graves</td>
<td>0.62%</td>
</tr>
<tr>
<td>GA006026</td>
<td>Antoine Graves Annex</td>
<td>0.36%</td>
</tr>
<tr>
<td>GA006054</td>
<td>Barge Road</td>
<td>0.16%</td>
</tr>
<tr>
<td>GA006003A</td>
<td>Capitol Homes</td>
<td>N/A*</td>
</tr>
<tr>
<td>GA006047</td>
<td>Cheshire Bridge Road</td>
<td>0.27%</td>
</tr>
<tr>
<td>GA006024</td>
<td>Cosby Spears Towers</td>
<td>1.24%</td>
</tr>
<tr>
<td>GA006030</td>
<td>East Lake Towers</td>
<td>0.16%</td>
</tr>
<tr>
<td>GA006025</td>
<td>Georgia Avenue</td>
<td>0.00%</td>
</tr>
<tr>
<td>GA006053</td>
<td>Hightower Manor</td>
<td>0.22%</td>
</tr>
<tr>
<td>GA006013</td>
<td>John O. Chiles</td>
<td>0.16%</td>
</tr>
<tr>
<td>GA006043</td>
<td>Juniper - 10th St.</td>
<td>0.99%</td>
</tr>
<tr>
<td>GA006052</td>
<td>Marian Apartments</td>
<td>0.11%</td>
</tr>
<tr>
<td>GA006058</td>
<td>Marietta Road</td>
<td>0.18%</td>
</tr>
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<td>GA006016</td>
<td>Martin Luther King Towers</td>
<td>0.14%</td>
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<tr>
<td>GA006014</td>
<td>Palmer House</td>
<td>0.60%</td>
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<tr>
<td>GA006045</td>
<td>Peachtree Road</td>
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<td>Piedmont Road</td>
<td>0.07%</td>
</tr>
<tr>
<td>GA006027</td>
<td>Roosevelt House</td>
<td>1.19%</td>
</tr>
<tr>
<td><strong>Family</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>GA006028</td>
<td>Bankhead Courts</td>
<td>1.47%</td>
</tr>
<tr>
<td>GA006012</td>
<td>Bowen Homes</td>
<td>2.19%</td>
</tr>
<tr>
<td>GA006023</td>
<td>Englewood Manor</td>
<td>3.16%</td>
</tr>
<tr>
<td>GA006021</td>
<td>Gilbert Gardens</td>
<td>12.40%</td>
</tr>
<tr>
<td>GA006004</td>
<td>Grady Homes</td>
<td>0.91%</td>
</tr>
<tr>
<td>GA00605R2</td>
<td>Herndon Homes</td>
<td>2.95%</td>
</tr>
<tr>
<td>GA006020</td>
<td>Hollywood Courts</td>
<td>1.36%</td>
</tr>
<tr>
<td>GA006002</td>
<td>John Hope Model Building**</td>
<td>-17.75%***</td>
</tr>
<tr>
<td>GA006032</td>
<td>Jonesboro North</td>
<td>1.71%</td>
</tr>
<tr>
<td>GA006031</td>
<td>Jonesboro South</td>
<td>2.82%</td>
</tr>
<tr>
<td>GA006029</td>
<td>Leila Valley</td>
<td>3.05%</td>
</tr>
<tr>
<td>GA006056</td>
<td>Martin Street Plaza</td>
<td>1.00%</td>
</tr>
<tr>
<td>GA006016</td>
<td>McDaniel Glenn</td>
<td>0.04%</td>
</tr>
<tr>
<td>GA006017</td>
<td>Thomasville Heights</td>
<td>1.02%</td>
</tr>
<tr>
<td>GA006010</td>
<td>University Homes</td>
<td>2.84%</td>
</tr>
<tr>
<td>GA006024</td>
<td>U-Rescue Villa</td>
<td>1.91%</td>
</tr>
<tr>
<td>GA006044</td>
<td>Westminster</td>
<td>0.84%</td>
</tr>
</tbody>
</table>

*Capitol Homes residents were relocated by June 30, 2003 due to property revitalization.
**Six-unit residential building remaining from revitalized John Hope Homes.
***Includes rents paid in advance of due date and/or credits reimbursed to tenants.
<table>
<thead>
<tr>
<th>Development Number</th>
<th>Development</th>
<th>2003 % of Rents Uncollected</th>
</tr>
</thead>
<tbody>
<tr>
<td>GA006083</td>
<td>Ashley Court at Cascade I &amp; II</td>
<td>1.59%</td>
</tr>
<tr>
<td>GA006084</td>
<td>Ashley Terrace at West End I</td>
<td>0.13%</td>
</tr>
<tr>
<td>GA006077</td>
<td>Centennial Place I</td>
<td>0.48%</td>
</tr>
<tr>
<td>GA006077A</td>
<td>Centennial Place II</td>
<td></td>
</tr>
<tr>
<td>GA006077B</td>
<td>Centennial Place III</td>
<td></td>
</tr>
<tr>
<td>GA006077C</td>
<td>Centennial Place IV</td>
<td></td>
</tr>
<tr>
<td>GA006081</td>
<td>Columbia Village</td>
<td>0.24%</td>
</tr>
<tr>
<td>GA006069</td>
<td>Magnolia Park I</td>
<td>0.38%</td>
</tr>
<tr>
<td>GA006086</td>
<td>Magnolia Park II</td>
<td></td>
</tr>
<tr>
<td>GA006070</td>
<td>Summerdale Commons I</td>
<td>14.51%</td>
</tr>
<tr>
<td>GA006079</td>
<td>Summerdale Commons II</td>
<td></td>
</tr>
<tr>
<td>GA006061</td>
<td>Village at Castleberry Hill I</td>
<td>6.50%</td>
</tr>
<tr>
<td>GA006080</td>
<td>Village at Castleberry Hill II</td>
<td></td>
</tr>
<tr>
<td>GA006085</td>
<td>Villages at Carver I</td>
<td>0.42%</td>
</tr>
<tr>
<td>GA006065</td>
<td>Villages of East Lake I</td>
<td>1.11%</td>
</tr>
<tr>
<td>GA006078</td>
<td>Villages of East Lake II</td>
<td></td>
</tr>
<tr>
<td><strong>Average</strong></td>
<td></td>
<td><strong>1.77%</strong></td>
</tr>
</tbody>
</table>
### Public Housing Assisted Community Work Order Responses as of 6/30/03

<table>
<thead>
<tr>
<th>Development</th>
<th>Development</th>
<th>Emergency % Abated Under 24 Hrs</th>
<th>Avg. Days to Complete</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>High-Rise</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>GA006011</td>
<td>Antoine Graves</td>
<td>100.00%</td>
<td>0.07</td>
</tr>
<tr>
<td>GA006026</td>
<td>Antoine Graves Annex</td>
<td>100.00%</td>
<td>0.09</td>
</tr>
<tr>
<td>GA006054</td>
<td>Barge Road</td>
<td>100.00%</td>
<td>0.00*</td>
</tr>
<tr>
<td>GA006003A</td>
<td>Capitol Homes</td>
<td>100.00%</td>
<td>1.60</td>
</tr>
<tr>
<td>GA006047</td>
<td>Cheshire Bridge Road</td>
<td>100.00%</td>
<td>0.29</td>
</tr>
<tr>
<td>GA006024</td>
<td>Cosby Spears Towers</td>
<td>98.20%</td>
<td>2.22</td>
</tr>
<tr>
<td>GA006030</td>
<td>East Lake Towers</td>
<td>100.00%</td>
<td>0.05</td>
</tr>
<tr>
<td>GA006025</td>
<td>Georgia Avenue</td>
<td>97.92%</td>
<td>0.29</td>
</tr>
<tr>
<td>GA006053</td>
<td>Hightower Manor</td>
<td>100.00%</td>
<td>0.66</td>
</tr>
<tr>
<td>GA006013</td>
<td>John O. Chiles</td>
<td>100.00%</td>
<td>0.06</td>
</tr>
<tr>
<td>GA006043</td>
<td>Juniper - 10th St.</td>
<td>100.00%</td>
<td>1.18</td>
</tr>
<tr>
<td>GA006052</td>
<td>Marian Apartments</td>
<td>89.66%</td>
<td>1.68</td>
</tr>
<tr>
<td>GA006058</td>
<td>Marietta Road</td>
<td>100.00%</td>
<td>0.01</td>
</tr>
<tr>
<td>GA006016</td>
<td>Martin Luther King Towers</td>
<td>100.00%</td>
<td>0.01</td>
</tr>
<tr>
<td>GA006014</td>
<td>Palmer House</td>
<td>100.00%</td>
<td>0.88</td>
</tr>
<tr>
<td>GA006045</td>
<td>Peachtree Road</td>
<td>100.00%</td>
<td>0.09</td>
</tr>
<tr>
<td>GA006048</td>
<td>Piedmont Road</td>
<td>100.00%</td>
<td>0.00*</td>
</tr>
<tr>
<td>GA006027</td>
<td>Roosevelt House</td>
<td>89.50%</td>
<td>5.16</td>
</tr>
<tr>
<td><strong>Family</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>GA006028</td>
<td>Bankhead Courts</td>
<td>99.88%</td>
<td>0.35</td>
</tr>
<tr>
<td>GA006012</td>
<td>Bowen Homes</td>
<td>100.00%</td>
<td>0.004</td>
</tr>
<tr>
<td>GA006023</td>
<td>Englewood Manor</td>
<td>99.70%</td>
<td>14.26</td>
</tr>
<tr>
<td>GA006021</td>
<td>Gilbert Gardens</td>
<td>99.81%</td>
<td>3.54</td>
</tr>
<tr>
<td>GA006004</td>
<td>Grady Homes</td>
<td>100.00%</td>
<td>0.04</td>
</tr>
<tr>
<td>GA006005R2</td>
<td>Herndon Homes</td>
<td>100.00%</td>
<td>0.47</td>
</tr>
<tr>
<td>GA006020</td>
<td>Hollywood Courts</td>
<td>100.00%</td>
<td>0.12</td>
</tr>
<tr>
<td>GA006002</td>
<td>John Hope Model Building**</td>
<td>None**</td>
<td>22.00</td>
</tr>
<tr>
<td>GA006032</td>
<td>Jonesboro North</td>
<td>100.00%</td>
<td>29.21</td>
</tr>
<tr>
<td>GA006031</td>
<td>Jonesboro South</td>
<td>100.00%</td>
<td>18.00</td>
</tr>
<tr>
<td>GA006029</td>
<td>Leila Valley</td>
<td>100.00%</td>
<td>29.75</td>
</tr>
<tr>
<td>GA006056</td>
<td>Martin Street Plaza</td>
<td>98.85%</td>
<td>0.56</td>
</tr>
<tr>
<td>GA006016</td>
<td>McDaniel Glenn</td>
<td>99.85%</td>
<td>0.99</td>
</tr>
<tr>
<td>GA006017</td>
<td>Thomasville Heights</td>
<td>99.88%</td>
<td>0.99</td>
</tr>
<tr>
<td>GA006010</td>
<td>University Homes</td>
<td>99.64%</td>
<td>5.52</td>
</tr>
<tr>
<td>GA006024</td>
<td>U-Rescue Villa</td>
<td>97.16%</td>
<td>2.82</td>
</tr>
<tr>
<td>GA006044</td>
<td>Westminster</td>
<td>100.00%</td>
<td>0.70</td>
</tr>
</tbody>
</table>

*Abated non-emergency work orders in less than 1 day.

**Six-unit residential building remaining from revitalized John Hope Homes.

*None - As indicated, no emergency or non-emergency work orders were submitted during fiscal year 2003.
<table>
<thead>
<tr>
<th>Development</th>
<th>Development</th>
<th>Emergency</th>
<th>Non-Emergency</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>% Abated Under 24 Hrs</td>
<td>Avg. Days to Complete</td>
</tr>
<tr>
<td><strong>Mixed-Income</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>GA006083</td>
<td>Ashley Court at Cascade I &amp; II</td>
<td>None*</td>
<td>None*</td>
</tr>
<tr>
<td>GA006084</td>
<td>Ashley Terrace at West End I</td>
<td>None*</td>
<td>None*</td>
</tr>
<tr>
<td>GA006077</td>
<td>Centennial Place I</td>
<td></td>
<td></td>
</tr>
<tr>
<td>GA006077A</td>
<td>Centennial Place II</td>
<td></td>
<td></td>
</tr>
<tr>
<td>GA006077B</td>
<td>Centennial Place III</td>
<td></td>
<td></td>
</tr>
<tr>
<td>GA006077C</td>
<td>Centennial Place IV</td>
<td>100.00%</td>
<td>2.61</td>
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<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>GA006081</td>
<td>Columbia Village</td>
<td>None*</td>
<td>None*</td>
</tr>
<tr>
<td>GA006069</td>
<td>Magnolia Park I</td>
<td></td>
<td></td>
</tr>
<tr>
<td>GA006086</td>
<td>Magnolia Park II</td>
<td>None*</td>
<td>0.78</td>
</tr>
<tr>
<td>GA006070</td>
<td>Summerdale Commons I</td>
<td></td>
<td></td>
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<tr>
<td>GA006079</td>
<td>Summerdale Commons II</td>
<td>100.00%</td>
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</tr>
<tr>
<td>GA006061</td>
<td>Village at Castleberry Hill I</td>
<td></td>
<td></td>
</tr>
<tr>
<td>GA006080</td>
<td>Village at Castleberry Hill II</td>
<td>100.00%</td>
<td>13.31</td>
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<tr>
<td>GA006085</td>
<td>Villages at Carver I</td>
<td>None*</td>
<td>0.49</td>
</tr>
<tr>
<td>GA006065</td>
<td>Villages of East Lake I</td>
<td></td>
<td></td>
</tr>
<tr>
<td>GA006078</td>
<td>Villages of East Lake II</td>
<td>100.00%</td>
<td>0.17</td>
</tr>
<tr>
<td><strong>99.62% (Total)</strong></td>
<td></td>
<td></td>
<td>2.87 (Average)</td>
</tr>
</tbody>
</table>

*None* - As indicated, no emergency or non-emergency work orders were submitted during fiscal year 2003.
The Housing Authority of the City of Atlanta, Georgia

Statement of Corporate Policies
Governing the Leasing and Residency of Assisted Apartments

This Statement of Corporate Policies Governing the Leasing and Residency of Assisted Apartments (“Statement of Corporate Policies”) forms the broad basis of and authorizes the establishment of administrative procedures and management practices that govern the leasing and residency of apartments in Public Housing Assisted communities and Mixed Income Mixed Finance communities affiliated with The Housing Authority of the City of Atlanta, Georgia (“Atlanta Housing Authority”).

For purposes of the Statement of Corporate Policies, “Public Housing Assisted” communities are those where all of the rentable apartments are leased by eligible low income families, and “Mixed Income Mixed Finance” communities sponsored by Atlanta Housing Authority where a percentage of apartments are reserved for and leased by eligible low income families. Collectively, apartments in the Public Housing Assisted and Mixed Income Mixed Finance communities will be referred to as “Assisted Apartments”.

The Statement of Corporate Policies is organized around the guiding principles of Atlanta Housing Authority’s continuing success as a provider or sponsor of quality affordable housing in its role as a leader in community building initiatives that create vibrant and safe environments for seniors, families with children, and persons with disabilities.

The Statement of Corporate Policies envisions the creative design and eventual implementation of several initiatives designed to enhance the quality of life of residents, promote resident economic and lifestyle independence, and operate the communities more efficiently. Such initiatives include, but are not limited to: Individual Development Accounts (“IDA”), stringent screening, Rent Policy flexibility, and strategies aimed at assisting resident families achieve economic and life-style independence.

The Statement of Corporate Policies supersedes all prior Admission and Continued Occupancy Policies and takes precedence over all administrative procedures and management practices that may conflict with this document.

The Statement of Corporate Policies is aligned with the Moving to Work Demonstration Program Agreement executed by and between the U.S. Department of Housing and Urban Development and Atlanta Housing Authority. Said Agreement governs and supersedes, as appropriate, applicable Federal laws, rules, regulations, contracts, and agreements that have been waived and/ or modified by the Moving to Work Demonstration Program Agreement.
The Statement of Corporate Policies shall be effective on July 1, 2004, pursuant to the resolution passed by the Board of Directors of The Housing Authority of the City of Atlanta, Georgia on June 16, 2004.

The Statement of Corporate Policies may be amended or modified by the President and CEO at any time without a vote of the Board of Commissioners, provided that such amendments and modifications do not materially change the intent of these Policies.

PART I - FOUNDATION OF CORPORATE POLICIES

ARTICLE ONE. MOVING TO WORK DEMONSTRATION PROGRAM

1. As a Moving to Work Demonstration Program agency, Atlanta Housing Authority will establish, implement and evaluate innovative cost-effective affordable housing strategies for its Assisted Apartments that are designed to achieve greater operational efficiencies and succeed in helping more low income families achieve economic independence.

2. Atlanta Housing Authority’s leasing and residency policies are based on the following four goals underlying its delivery and promotion of affordable housing resources: (1) become a superior provider of quality affordable housing and property and asset management services; (2) develop Atlanta Housing Authority into an economically viable and self-sustaining entity; (3) expand, improve, and diversify Atlanta Housing Authority’s portfolio and its influence in the affordable housing market while becoming a catalyst for community revitalization; and (4) promote and support economic self-sufficiency and upward mobility out of public housing.

3. This Statement of Corporate Policies describes Atlanta Housing Authority’s overarching vision for the reinvention of affordable housing. To achieve this goal, the Statement of Corporate Policies uses a two prong approach which provides a comprehensive overview of the leasing and residency framework, while recognizing that implementation of the various initiatives may be immediate, progressive, or refined through various demonstration programs. The Statement of Corporate Policies recognizes the interconnectiveness of
community reputation, screening thoroughness, lease enforcement, resident responsibility, operation efficiency and commitment to resident economic and lifestyle independence, to the success of vibrant, dynamic and productive communities. Specific implementation strategies for any given year not already provided in the Statement of Corporate Policies will be referenced in Atlanta Housing Authority’s Moving to Work (MTW) Annual Plan.

ARTICLE TWO. FAIR HOUSING AND EQUAL OPPORTUNITY

Atlanta Housing Authority supports all applicable Federal and State nondiscrimination and fair housing laws and applicable HUD regulations.

ARTICLE THREE. DECONCENTRATION OF POVERTY

Atlanta Housing Authority provides for deconcentration of poverty by income mixing within communities where there are Assisted Apartments as provided by Atlanta Housing Authority’s Economic Deconcentration and Income Mixing Policy, appended hereto.

ARTICLE FOUR. FRAUD AND MISREPRESENTATION

1. The terms Applicant and Resident are defined to include all family/ household members with respect to their compliance with the policies set forth in the Statement of Corporate Policies.

2. Applicants and Residents are required to provide truthful, complete information relating to all income, family composition, and all family background information to qualify for initial eligibility and continued residency in an Assisted Apartment.

3. Applicants and Residents who engage in acts of fraud and misrepresentation are subject to prosecution under State and Federal laws, and where appropriate, will be referred for such prosecution by Atlanta Housing Authority.

4. An Applicant for, or a Resident receiving, public housing assistance who has made any misrepresentation at the time of admission, during any subsequent Lease Renewal Review, or at any other time shall be denied admission or be subject to termination or non-renewal of tenancy, as applicable.
PART II – APPLICANT AND RESIDENT SUITABILITY

ARTICLE ONE. DETERMINING CRITERIA

1. An Applicant desiring to lease an Assisted Apartment must first demonstrate that (1) the Applicant is an eligible low income family based on total annual household income pursuant to and verified according to U. S. Department of Housing and Urban Development (HUD) rules and regulations; (2) that the Applicant satisfies HUD’s statutory and regulatory requirements for citizenship/ eligible immigrant status; and (3) the Applicant would be a suitable Resident based on past satisfactory behavior as a renter including housekeeping performance, good payment records for rent and utilities, an acceptable record as a law-abiding member of society, and a commitment to abide by the Dwelling Lease offered to eligible Applicants (the “Lease”).

2. A Resident of an Assisted Apartment must continue to demonstrate that the Resident is a suitable Resident based on satisfactory behavior as a renter including housekeeping performance, good payment records for rent, other charges and utilities, satisfactory record of lease compliance, and an acceptable record as a law-abiding member of society.

3. All Applicants and Residents must certify at application, and Residents must certify at recertification, that they have the ability to comply with all requirements of the Lease, including those which require the ability to exit the building in the event of an emergency and such other related certifications as deemed appropriate by the Atlanta Housing Authority, without the Atlanta Housing Authority having to provide services beyond those stated in the Lease. This responsibility applies to all Applicants and Residents, including those Applicants and Residents who may have physical or mental impairments that otherwise cannot be addressed by reasonable accommodations.

ARTICLE TWO. INITIAL LEASING CONSIDERATIONS

1. An Applicant desiring to lease an Assisted Apartment must apply at the community or communities of the Applicant’s
choice according to the procedures established by the respective community or communities.

2. An Applicant who applies will be placed on the applicable site-based waiting list for the community or communities according to the Applicant’s local preference status as delineated in Article Three below.

3. At certain communities with Assisted Apartments under the Moving to Work Demonstration Program, applicants may be required to pay an appropriate non-refundable leasing fee, which may be applied to each approved Applicant’s security deposit after the Applicant accepts the offer of and leases an Assisted Apartment.

ARTICLE THREE. LOCAL PREFERENCES

Atlanta Housing Authority has local preference policies for: (1) Elderly, Almost Elderly and Young Disabled Applicants for its highrise communities with Assisted Apartments; and (2) working Applicants, including provisions for elderly and disabled families, for its family communities with Assisted Apartments. The local preferences are outlined below:

1. Local Preference for Elderly, Almost-Elderly and Young Disabled Applicants.

   A. An Applicant applying for an Assisted Apartment in a mixed population community whose head, spouse, or sole member is Elderly (62 years of age and older), Almost Elderly (55-61 years of age), or Young Disabled (under 55 years of age) shall receive first preference over Applicants who do not qualify as such under one of these categories in admission under the Highrise Communities’ Preference for Elderly, Almost Elderly, and Young Disabled Families.

   B. Atlanta Housing Authority under its Moving to Work Plan authority may designate one or more of its highrise
communities (and other elderly communities that Atlanta Housing Authority may acquire or sponsor) as a Percentage-Based Mixed Population highrise or community. This designation strives to achieve an optimal balance of Elderly and Young Disabled Residents in which at least 80% of all such Assisted Apartments will be occupied by Elderly and Almost Elderly residents. Atlanta Housing Authority’s Management Agent of a designated Percentage-Based Mixed Population highrise or community shall admit applicants from the waiting list at the ratio of four (4) Elderly and Almost Elderly Applicants to one (1) Young Disabled Applicant in order to achieve the goal of 80% Elderly and Almost Elderly Residents in the Percentage-Based Mixed Population highrise or community.

C. Atlanta Housing Authority under its Moving to Work Plan authority may also designate 100% of the Assisted Apartments in one or more of its highrise communities (and other elderly communities that Atlanta Housing Authority may acquire or sponsor) for Elderly and Almost Elderly Residents only. In such highrises or other communities, the Local Preference for Young Disabled Applicants will not apply.

D. In the event there is an insufficient number of Elderly and Almost Elderly applicants to admit to Assisted Apartments pursuant to paragraphs B. and C. above, Atlanta Housing Authority may exercise its authority, at its sole discretion, to permit Elderly and Almost Elderly Applicants on the Housing Choice Voucher program waiting list to be selected for screening and admission, if approved, to either a “Percentage-Based Mixed Population” or “Elderly and Almost Elderly Residents Only” highrise or community.

2. Family Community Preference for Working Families.

   A. Full-time Working Applicants (defined as families where the head, spouse or sole member is legally employed working 30 or more hours per week and has been employed for at least 12 consecutive months at that level
and earning more than 30% of Median Income for the Atlanta, Georgia Metropolitan Statistical Area ("MSA") or disabled families (defined as households where the head and spouse [if any] or sole member is a person with a disability) or elderly families (defined as households where the head and spouse [if any] or sole member is age 62 or older) applying for an apartment in a family community with Assisted Apartments shall receive first preference in admission under the Family Community Preference for Working Families.

B. Full-time Working Applicants (defined as families where the head, spouse or sole member is legally employed working 30 or more hours per week and has been employed for at least 12 consecutive months at that level and earning equal to or less than 30% of Median Income for the Atlanta, Georgia MSA, that do not qualify as disabled or elderly families) applying for an apartment in a family community with Assisted Apartments shall receive second preference in admission under the Family Community Preference for Working Families.

C. Part-time Working Applicants (defined as families where the head, spouse or sole member is legally employed working 20 or more hours per week but less than 30 hours per week and has been employed for at least 12 consecutive months at that level, that do not qualify as disabled or elderly families) applying for an apartment in a family community with Assisted Apartments shall receive third preference in admission under the Family Community Preference for Working Families.

D. All other Applicants, who do not otherwise qualify under paragraphs A, B, or C above, applying for an apartment in a family community with Assisted Apartments, shall receive no preference in admission under the Family Community Preference for Working Families.


A. In order to be eligible for a local preference under either the Highrise Community Preference for Elderly, Almost-Elderly, and Young Disabled Families or the Family Community Preference for Working Families,
Preference for Working Families, an Applicant’s qualification for the applicable local preference must be verified by a third party or through appropriate documentation.

B. An Applicant’s placement on a waiting list under either the Highrise Community Preference for Elderly, Almost-Elderly, and Young Disabled Families Local Preference or the Family Community Preference for Working Families shall be based on either the date-and-time of application or a random method such as a lottery, as determined by Atlanta Housing Authority or its management agents on a property-by-property basis, and subject to the ratios for admissions, as applicable.

C. Atlanta Housing Authority and its management agents will ensure that 40% or more of the Applicants admitted as Residents during any fiscal year into Atlanta Housing Authority’s highrise or family communities with Assisted Apartments shall be extremely low income families (defined as a family whose annual income is equal to or less than 30% of Median Income for the Atlanta, Georgia MSA).

D. A Resident who received a preference in admission under Section 2 of this Article Three, Family Community Preference for Working Families, that becomes unemployed after executing the Lease for an Assisted Apartment due to her/ his resignation, quitting, termination for cause, or other reasons based on the Resident’s actions, shall not receive any rent relief as a result of the loss of employment and shall continue to pay the Income Adjusted Rent or Affordable Flat Rent based on prior employment status, as applicable, for the community in which the Assisted Apartment is located. This provision may be waived if the Resident can document to the satisfaction of the Management Agent, with the burden of proof on the Resident, that the reason for the Resident’s loss of employment was based on an event that was beyond the control of the Resident and for which the Resident was not at fault.

E. The Local Preferences outlined in this Article Three shall be applicable to the Mixed Income Mixed Finance communities to the extent outlined in the Housing Management Plan for the applicable community.
ARTICLE FOUR. SCREENING OF APPLICANTS AND RESIDENTS

1. Applicants and Residents, at least 16 years of age or older, are subject to initial and ongoing screening to ensure that they can demonstrate their current and continued suitability as a Resident of a community with Assisted Apartments. Atlanta Housing Authority’s management agents, or in the case of the Mixed Income Mixed Finance communities, the Development Partner’s management company, shall be responsible for: (1) screening household members 16 years old and over; (2) conducting pre-initial (or pre-waiting list) screening of all Applicants; and (3) ensuring that all background information, including deductions and allowances, are properly verified.

2. Applicants shall undergo and complete the screening process prior to the offer of an apartment. Residents shall undergo and complete the screening process annually, on an interim basis (if deemed necessary for verification purposes), or over some longer interval of time based on Moving to Work Demonstration Program initiatives.

3. Screening practices that are common and customary for the purpose of leasing apartments in the State of Georgia shall be utilized including, but not limited to: examination of landlord and dispossessory records; review of past and current apartment management records; review of housekeeping performance based on a home visit; and requesting credit reports, utility records, and criminal background histories.

4. Applicants and Residents are required to provide their written consent to Atlanta Housing Authority, its management agents, or the Development Partner’s management company (Atlanta Housing Authority and the Development Partner’s management agents will collectively be referred to as “Management Agents”) to conduct any examination or third-party verification required under the screening process.

5. Applicants and Residents are required to cooperate with Atlanta Housing Authority and/or the Management Agents
during the screening process by providing truthful, complete
information relating to all income, family composition, criminal
history background, and all other family background
information.

6. Applicants with unsatisfactory screening reports will not be
offered an apartment. Residents with unsatisfactory screening
reports will be subject to termination or nonrenewal of their
leases.

7. Applicants and Residents with unsatisfactory screening reports
will be presented with a copy of any adverse report(s) or
reason(s) and the opportunity to dispute the accuracy and
relevance of the adverse report(s) or reason(s) prior to any final
action on the part of the Management Agents that may result in
the denial of admission of an Applicant or the nonrenewal of a
Resident’s lease or eviction of a Resident. Applicants and
Residents desiring to dispute such determinations may do so as
set forth in Part III, Article Seven: “Disputes Against
Management.”

8. Applicants and Residents with adverse criminal history reports
will be subject to the provisions of Part II, Article Five of this
Statement of Corporate Policies.

9. Atlanta Housing Authority and the Management Agents will
share information with one another on the denial of admission
of Applicants and the termination of Residents in order to avoid
any duplication of effort and ensure the integrity of the
screening process.

**ARTICLE FIVE. CRIMINAL HISTORY SCREENING**

The policies related to criminal history screening are designed to
provide a clear, straightforward, structured, and standardized
approach to criminal history screening which ensures the
continued stability of the communities while offering public
housing assistance to the best qualified low income families.
1. LEVEL 1 OFFENSES REQUIRING PERMANENT DENIAL OF ADMISSION AND TERMINATION OF TENANCY

Applicants or Residents, or any member of their households, convicted of, arrested or under an outstanding warrant for, or reasonably believed to be engaged in any Level 1 Offense listed below shall be denied admission or subject to termination of tenancy permanently from the later of the date of first written documentation of the offense, date of arrest, conviction, or end of period of confinement. The following offenses are deemed Level 1 Offenses:

A. Conviction Related to the Manufacture or Production of Methamphetamine on the Premises of Federally Assisted Housing

B. Previous Eviction from Federally Assisted Housing for Drug-Related Criminal Activity

C. Current Illegal Use of a Drug (to the extent such use is reasonably believed to be continuing)

D. Lifetime Registration Under a State Sex Offender Registration Program

E. Homicide, Murder, Voluntary Manslaughter

F. Aggravated Stalking

G. Rape, Sexual Battery, Aggravated Sexual Battery, other Aggravated Sex-Related Crimes

H. Aggravated Assault, Aggravated Battery

I. Child Molestation, Aggravated Child Molestation, Child Sexual Exploitation

J. Burglary

K. Robbery

L. Trafficking, Distribution, Manufacture, Sale, Use, or Possession of Illegal Drugs
M. Trafficking, Distribution, Manufacture, Sale, Use, or Possession of Illegal Firearms

N. Kidnapping, False Imprisonment

O. Hate Crimes

P. Terrorism

Q. Arson

R. Possessing, Transporting or Receiving Explosives or Destructive Devices with the Intent to Kill, Injure, Intimidate or Destroy

S. Other Violent or Drug-Related Offenses that may Pose a Threat to Public Health and Safety

2. LEVEL 2 OFFENSES REQUIRING 20-YEAR DENIAL OF ADMISSION AND TERMINATION OF TENANCY

Applicants or Residents, or any member of their households, convicted of, arrested or under an outstanding warrant for, or reasonably believed to be engaged in any Level 2 Offense listed below shall be denied admission or subject to termination of tenancy, as applicable, for a period of 20 years from the later of the date of first written documentation of the offense, date of arrest, conviction, or end of period of confinement. The following offenses are deemed Level 2 Offenses:

A. Motor Vehicle Theft, “Carjacking”

B. Criminal Damage to Property Endangering Life, Health and Safety

C. Assault and Battery

D. Aiding and Abetting in the Commission of a Crime Involving Violence

E. Stalking
F. Larceny

G. Other Offenses Involving the Threat of Foreseeability of Violence or Drugs that may Pose a Threat to Public Health and Safety

3. LEVEL 3 OFFENSES REQUIRING 5-YEAR DENIAL OF ADMISSION AND TERMINATION OF TENANCY

Applicants or Residents, or any member of their households, convicted of, arrested or under an outstanding warrant for, or reasonably believed to be engaged in any Level 3 Offense listed below (within the five year period preceding application or at any time during tenancy) shall be denied admission or subject to termination of tenancy, as applicable, for a period of 5 years from the later of the date of first written documentation of the offense, date of arrest, conviction, or end of period of confinement. The following offenses are deemed Level 3 Offenses:

A. Gross Child Neglect

B. Disorderly Conduct

C. Abuse or Pattern of Abuse of Alcohol (to the extent such abuse poses a threat to the health, safety, or peaceful enjoyment of the premises by other residents)

D. Prostitution and Solicitation of Prostitution

E. Harassment

F. Vandalism

G. Receiving Stolen Goods

H. Other Misdemeanor or minor Offenses that may Pose a Threat to Public Health and Safety
4. OTHER CRIMINAL ACTIVITY

Atlanta Housing Authority and/or the Management Agents may deny admission to applicants or terminate or not renew the leases of residents: (i) whose criminal activity or other habits and practices reasonably may be expected to have a detrimental effect on the residents or the community environment; (ii) who engage in a pattern of criminal activity; or (iii) whose past criminal activity if repeated could reasonably be expected to adversely affect the health, safety or welfare of other residents, Atlanta Housing Authority and/or the Management Agent’s staff.

5. APPLICANT/ RESIDENT RESPONSE TO ADVERSE CRIMINAL HISTORY INFORMATION DECISIONS

Based on adverse criminal history information gathered during the screening process, Paragraphs 1, 2, 3, and 4 of this Article set forth the presumptions that Atlanta Housing Authority and the Management Agents are entitled to rely upon when denying admission to Applicants and terminating or not renewing the leases of Residents who fall within the scope of this Article. Applicants and Residents will be afforded the opportunity to prove, with the burden of proof resting with the Applicant or Resident that the provisions under Paragraphs 1, 2, 3, and/or 4 do not apply to the subject Applicant/ Resident.

A. Denied Applicants desiring to dispute such determinations may do so as set forth in Part III, Article Seven: “Disputes Against Management.” Denied Applicants may prove, and Management Agents will consider the following:

i. The criminal charge which is the subject of the denial was dismissed, or the case was placed on the dead docket, or the case was not prosecuted and the Applicant did not commit the offense for which the Applicant was arrested or convicted.

ii. The time of the offense is extremely remote and the Applicant has not engaged in any other criminal activity since the offense or can otherwise demonstrate substantial rehabilitation.
iii. The nature of the offense, or the nature of the Applicant’s conduct during or level of involvement in the offense was such that Applicant is not likely to adversely affect the health, safety or welfare of other residents at the community.

iv. Such other information or evidence as the Management Agents may request on a case-by-case basis to aid in the final decision on whether or not the Applicant/Resident has met the burden of proof.

B. Residents subject to Lease termination who desire to dispute the accuracy and relevance of the criminal history information may do so as set forth in Part III, Article Seven: “Disputes Against Management.”

6. MANAGEMENT AGENT RESPONSIBILITY

The Management Agent has the sole authority and responsibility to determine whether the particular criminal activity of the Applicant/Resident (or household member) is a Level 1, 2 or 3 Offense.

PART III - RESIDENT BENEFITS AND OPPORTUNITIES

ARTICLE ONE. RENT, INDIVIDUAL DEVELOPMENT ACCOUNTS, AND SECURITY DEPOSITS

1. Residents are expected to pay rent according to the instructions provided by the property management company pursuant to the terms of the Lease.

2. Atlanta Housing Authority may, from time to time, establish various rent structures that will combine the rent charged to residents with the budgeted federal subsidy in order to balance affordability and operating expenses to ensure that the financial obligations of each community with Assisted Apartments are covered.

3. Rent structures will be evaluated on a property-by-property basis with the goal of using the rent structure that best places the individual community in a position to remain a self-sustaining, efficient and effective community. The appropriate rent structure for each community with Assisted Apartments
may be established by using one or a combination of the following income and non-income based approaches:

A. “Income Adjusted Rent” which is a rent structure based on a percentage of the Resident’s adjusted household income; and/ or

B. “Affordable Flat Rent” which is a rent structure based on several property-related factors, including, but not limited to, the particular community in question, location, unit size, operating costs and other expenses, demand for the community, community demographics, and the amenity package.

4. The rent structures that will be used at each community will be specified in Atlanta Housing Authority’s Annual MTW Plan and may change from year to year depending on the MTW goals for the particular community.

5. When the Income Adjusted Rent and the Affordable Flat Rent are available in the Resident’s community, the amount of a Resident’s rent will be based on whether a Resident selects either the “Income Adjusted Rent,” or an “Affordable Flat Rent.”

6. When the Income Adjusted Rent and the Affordable Flat Rent are available in the Resident’s community, a Resident will be subject to a “Rent Adjustment Fee” if the Resident changes the method of rent payment during the calendar year, unless the Resident can document a hardship reason as to why the change is necessary.

7. Residents paying an Income Adjusted Rent must pay a minimum rent of $125, or such lesser or greater amount as Atlanta Housing Authority may set from time to time.

8. The minimum rent requirement does not apply to Resident households, in which all household members are either elderly and/ or disabled, and whose sole source of income is Social Security, SSI, or other fixed annuity pension or retirement plans. Such Resident households will still be expected to pay the Income Adjusted Rent or Affordable Flat Rent, as applicable.
9. Affordable Flat Rents will be required in selected Moving to Work Demonstration Program communities as identified in Atlanta Housing Authority’s Annual MTW Plan. All Residents residing in these communities will have to pay the applicable Affordable Flat Rent in accordance with the schedule established for their community with Assisted Apartments.

10. Security deposits shall be maintained at such levels as Atlanta Housing Authority and/or the Management Agents may determine based on the bedroom size and the particular community with Assisted Apartments.

11. Generally, Atlanta Housing Authority does not expect that the establishment of a new minimum rent or other rent structure described in paragraph 3 of this Article will create a hardship since no such rent initiatives will go into effect without providing at least sixty (60) days advance notice. Even so, a family who has previously paid one or more months of rent but is unable to pay the new minimum rent or Affordable Flat Rent, due to extraordinary financial distress, may request hardship consideration.

A. A hardship may exist when any one of the following circumstances is present: (i) the family has lost eligibility for (through no fault of the family) or is waiting an eligibility determination for a Federal, State, or local assistance program; (ii) the income of the family has decreased because of extraordinary changed circumstances, including loss of employment (through no fault of the Resident family); (iii) although the family is diligently seeking to increase the family’s income, the increase is not yet sufficient to fully pay the new rent; or (iv) such other extraordinary circumstances as Atlanta Housing Authority and/or the Management Agent may determine.

B. The Management Agent shall promptly investigate any request for hardship and take appropriate actions based on whether a hardship is established and the family is otherwise complying with its obligations under an
approved economic independence program and the planning documents formulated for the family. Such actions may include, but not be limited to:

i. Temporary suspension of the entire minimum rent under such terms as the Management Agent shall direct. Such suspensions shall not last greater than ninety (90) days and will require the repayment of the arrearages within a time frame established by the Management Agent;

ii. Accelerated enrollment in one of Atlanta Housing Authority’s approved economic independence program components;

iii. Referral to third party agencies who assist residents with the payment of rent;

iv. Such other actions as the Management Agent shall direct.

ARTICLE TWO. BASIC LEASE OBLIGATIONS AND RESPONSIBILITIES

1. Residents are to live in the apartment in such a manner so as to not adversely impact the quiet, peaceful enjoyment of the premises by other residents while meeting all of the obligations set forth in the Lease, including, but not limited to, those obligations relating to housekeeping, other health and safety concerns, criminal activity prohibitions, reporting criminal activity on the premises, and economic independence initiatives.

2. Each Resident must undergo a “Lease Renewal Review” process in a manner and at a frequency determined by Atlanta Housing Authority and/or the Management Agents based on the particular community in which the Resident resides. Lease Renewal Reviews will be conducted annually, on an interim basis (if deemed necessary for verification purposes), or over some longer interval of time based on Moving to Work Demonstration Program initiatives.

3. Each adult Resident (18 years or older) is required to be gainfully employed on a fulltime basis (i.e., at least thirty [30] hours per week) unless the resident is Elderly or Disabled (i.e., verifiably not able to work due to the disability).
4. Residents who are not working full-time will be required to enroll and satisfactorily participate in an established and approved Atlanta Housing Authority and/or Management Agent initiated economic independence program, and may be required to have part-time employment (see paragraph 6 below). Any member of the Resident’s household who is 16 years of age or older and not attending a public or private secondary school full-time is also subject to this work requirement.

5. Each Resident, regardless of the Resident’s work status (full or part-time employment), may be required to participate in an approved economic and life-style initiative that has as one of its components, the completion of an approved planning document, which charts out a path for the Resident towards economic, and life-style independence and devises strategies to address any barriers confronting the Resident.

6. Each adult Resident (18 years or older), who is enrolled in and attending a training component of an approved economic independence program, or attending school, but is not in training or class at least 30 hours per week, must work the required number of hours to achieve, at a minimum, a combination of training/schooling and work hours of 30 hours per week. This requirement does not apply to a Resident, who is Elderly or Disabled (i.e., verifiably not able to work due to the disability). Any member of the Resident’s household who is 16 years of age or older and not attending a public or private secondary school is also subject to this 30-hour requirement. A Resident may use participation in an AHA-approved training program a maximum of 3 times as a partial exemption from fulltime work of 30 hours during her/his residency tenure.

7. Although the U.S. Department of Housing and Urban Development encourages unemployed Residents who are not Elderly or Disabled to contribute a minimum number of hours of community service each month, Atlanta Housing Authority will not require such participation in light of Atlanta Housing Authority’s other employment and economic independence policies designed to assist residents achieve upward mobility goals.
8. Each Resident leaseholder is responsible for ensuring that all school age children attend school on a regular basis in accordance with local school board policies and state law. Resident shall provide Atlanta Housing Authority with such information, releases and authority so that Atlanta Housing Authority, through the Management Agents, can inquire into the attendance status of any school age child on the Lease.

9. Each Resident Head of Household and resident household members shall be responsible for the actions and activities of family members, visitors, guests, and invitees while those persons are either a member of the household, visiting the household, or are on the property.

10. Residents who fail to fulfill the obligations and responsibilities under the provisions of this Part III, Article Two, or under the provisions of the Lease shall be subject to the nonrenewal or termination of their Lease.

ARTICLE THREE. OCCUPANCY, CHARGES AND ALLOWANCES

1. To avoid overcrowding and the conditions that may arise from overcrowding, Residents will be assigned to an apartment so that generally no more than two adults occupy a bedroom. Additional consideration, as determined by the Management Agent, may be given to families with small children or families with other significant circumstances, who may be requesting a larger apartment.

2. A Live-in Aide that is essential for the care and support of an Elderly or Disabled Resident, the need for which having been certified by a medical professional, may reside in the Assisted Apartment with the Elderly or Disabled Resident. In that the Management Agent has the sole authority to determine within reasonable limits the status of a Live-in Aide, a Live-in Aide must demonstrate her/ his suitability as a Resident pursuant to Part II of this Statement of Corporate Policies prior to occupancy, and continue to demonstrate her/ his suitability as a Resident and status as a Live-in Aide for as long as the Live-in Aide resides in the Assisted Apartment.
3. Atlanta Housing Authority will establish and publish for each community, by bedroom size, utility allowances which will afford for a “reasonable consumption of utilities by an energy conservative household of modest circumstances consistent with the requirements of a safe, sanitary, and healthful living environment”.

4. Residents who exceed the utility allowances will be charged for the excess utility usage.

5. Atlanta Housing Authority or the Management Agents may establish and, if established, publish for each community with Assisted Apartments a schedule of Maintenance Charges, Transfer Fees, Application Fees, Damage Fees, Supplement Screening Fees, Pet Deposits, Pet Application Fees, and Dispossessory Fees which may be charged to residents in addition to rent and excess utility charges, as applicable.

ARTICLE FOUR. RESIDENT COMMUNITY TRANSFERS

1. Residents may request a community transfer to another apartment within the same community with Assisted Apartments subject to approval by Atlanta Housing Authority’s Management Agent. A request to move to another community is not considered a community transfer. Residents must submit an application to the other community and, if approved, provide the appropriate notice under the current Lease.

2. Residents who have requested a community transfer must be current in all obligations under the Lease including, but not limited to: no outstanding charges for rent or other charges; no chronic rent delinquency (more than one late payment in a four month period); and no insufficient fund charges for the preceding six months.

3. A Resident’s request for a community transfer shall not be approved if the Resident has resided in the current apartment for less than one year, except in those cases where there are verifiable medical reasons or a verifiable permanent disability not present at move-in requiring special features, which cannot be provided through a reasonable accommodation in the current unit.
4. If the community transfer is approved by the Management Agent, the Resident must pay a “Transfer Fee” based on the schedule of fees published for the particular community with Assisted Apartments.

5. Residents will not have to pay the Transfer Fee if the transfer is required or initiated by Atlanta Housing Authority or the Management Agents, or for such other valid reason, such as a reasonable accommodation, as determined by the Management Agent.

ARTICLE FIVE. INDIVIDUAL DEVELOPMENT ACCOUNT (IDA) PROGRAM

The IDA program promotes and encourages personal economic independence among Residents through a monetary incentive program linked to meaningful capacity-building initiatives already being offered by a variety of organizations and institutions in Atlanta.

1. A mechanism will be created for eligible Residents to allow them to accrue a portion of their rental payments, which is in excess of a monetary threshold as determined by Atlanta Housing Authority, in a separate Individual Development Account (“IDA”).

2. To fulfill the eligibility requirements of the program, all Residents will be enrolled in an IDA program established by Atlanta Housing Authority, and will be required to participate in a personal economic development program approved by Atlanta Housing Authority.

3. The IDA program will give Residents the opportunity to accumulate financial resources to assist in their transition off of subsidy assistance.

4. The IDA program incentive will require eligible Residents to participate successfully by obtaining employment and achieving other economic independence milestones established under an approved economic independence program.
5. As Residents achieve their individualized milestones, Atlanta Housing Authority will collect and defer a portion of the rents collected beyond the assessed carrying cost of the Assisted Apartment in an IDA fund.

6. Residents that achieve the self-sufficiency and economic independence milestones will be eligible for reimbursement of IDA funds. Those who do not achieve their milestones will not be eligible for the IDA Program nor will they be eligible to receive a reimbursement of any portion of the funds in the IDA account.

7. The HUD Income Disregard requirement for Residents paying an Income Adjusted Rent will be eliminated.

8. Atlanta Housing Authority created an Elderly Income Disregard program that will exempt, on a permanent basis, all employment income earned by Elderly Residents. Elderly Residents will still be expected to pay the Income Adjusted Rent based on Social Security, SSI, or other fixed annuity pension and retirement plan income.

**ARTICLE SIX. HOUSEHOLD PET POLICY**

1. Atlanta Housing Authority has concluded that it is in the best interest of Residents of communities with Assisted Apartments to keep common household pets or other animals that are widely acknowledged and accepted as household pets, provided the Resident’s keeping of a pet is within the limitations and requirements established by and within the sole discretion of the Management Agent for the community.

2. Residents of communities with Assisted Apartments are not allowed to keep animals that are not widely acknowledged and accepted as household pets; to keep unregistered household pets; to keep household pets temporarily; or train or engage in any business activity related to household pets in the Resident’s apartment, or anywhere else within the community.

3. Residents in Mixed Income Mixed Finance communities, who desire to keep a common household pet, may only do so if
household pets are generally allowed at the community, and then only in strict accordance with the household pet procedures prescribed at the Resident’s Mixed Income Mixed Finance Community.

4. Certain Mixed Income Mixed Finance communities may exclude common household pets altogether if it is in the best interest of the community to do so.

5. Atlanta Housing Authority and the Management Agents will make reasonable accommodations for a “service animal” (e.g., seeing-eye dog) or a pet that Atlanta Housing Authority reasonably considers as a common household pet required as part of treatment for a demonstrated and verified medical or psychological condition tantamount to a disability or handicap.

ARTICLE SEVEN. DISPUTES AGAINST MANAGEMENT

1. Residents may exercise the right to convey a dispute to a representative of the Management Agent regarding certain adverse actions or certain failures to act on the part of the management agent that may result in a denial, significant reduction or termination of benefits otherwise due the resident.

2. Residents must request a meeting with the representative of the Management Agent within ten (10) days of the disputed action or failure to act in accordance with the dispute handling procedures in effect at the Resident’s community with Assisted Apartments. A Resident’s request for a meeting must be in writing.

3. The dispute handling procedures at each community with Assisted Apartments must include a step where the Resident is entitled to speak directly with the on-site representative of the Management Agent who made the initial decision affecting the Resident, and then be given an opportunity to meet with an off-site representative of the Management Agent who did not participate in the initial decision affecting the Resident. Meetings with the on-site and off-site Management Agents may be incorporated into a single meeting. A Resident may bring a representative to this meeting or meetings to assist the Resident.
4. The Management Agent’s final decision regarding the disputed matter will be rendered in writing and provided to the Resident within a reasonable period of time.

5. Applicants of Assisted Apartments who were denied admission and desire to dispute this action must request a meeting with the on-site representative of the Management Agent within ten (10) days of the disputed action. An Applicant’s request for a meeting must be in writing. An Applicant may bring a representative to this meeting to assist the Applicant. Applicant will not be afforded any further opportunities to meet with the Management Agent upon the conclusion of the requested meeting, which can be continued at the sole discretion of the Management Agent to review and consider other facts or documents related to a final decision in the matter.

6. The Management Agent’s final decision regarding the denial of admission will be rendered in writing to the Applicant within a reasonable period of time.

PART IV  MISCELLANEOUS

ARTICLE ONE.  AVAILABILITY OF OFFICIAL LEASING DOCUMENTS

1. Official leasing-related documents will be maintained in the management office of every community with Assisted Apartments, and can be reviewed by Applicants, Residents, and other interested parties upon reasonable request during normal office hours.

2. Fee Schedules, Rent Structures, Utility Allowances, Routine Maintenance and other charges may be amended or updated from time to time and shall be made available upon final approval.

ARTICLE TWO.  SPECIAL PROGRAMS

1. Atlanta Housing Authority may establish special waiting lists designed to address Resident economic or life-style self-sufficiency programs, Moving to Work Demonstration Program initiatives, and homeownership opportunities.
2. Police officers and other security personnel, who would not otherwise be eligible for such housing under the normal admission requirements, may be considered for admission to communities with Assisted Apartments pursuant to the “Admission Plan for Police Officers and Other Security Personnel to Reside in Public Housing.”

ARTICLE THREE. DEVELOPMENT OF MANAGEMENT PRACTICES

Administrative procedures, processes, protocols, and management practices for any policy, initiative, or approach in this Statement of Corporate Policies Article shall be developed following the intent of this Statement of Corporate Policies and may be amended from time to time at the discretion of Atlanta Housing Authority and/or the Management Agents.

ARTICLE FOUR. DOCUMENTS INCORPORATED BY REFERENCE

The following documents are incorporated by reference into this Statement of Corporate Policies Governing the Leasing and Residency of Assisted Apartments and should be consulted for guidance and for a fuller explanation of the policies stated herein.

1. Economic Deconcentration and Income Mixing Policy

2. Accessibility Policy

3. Affordable Housing Community Site-based Waiting List Policy


5. Site-based Waiting List Policy (Olympic Legacy Program)

6. Mixed-Income, Mixed-Finance Community Site-based Waiting List Policy Addendum
ATTACHMENT 1

ECONOMIC DECONCENTRATION AND INCOME MIXING POLICY

A. PURPOSE
This Economic Deconcentration and Income Mixing Policy (“Deconcentration Policy”) reaffirms the commitment of The Housing Authority of the City of Atlanta, Georgia (“AHA”) to provide for deconcentration of poverty and income mixing as required by the Quality Housing and Work Responsibility Act of 1998 (“QHWRA”) and subsequent guidance or regulations pertaining to the same issued by the United States Department of Housing and Urban Development (“HUD”).

B. SCOPE
This Deconcentration Policy shall apply to all communities of public housing actually managed by AHA professionals or managed under separate private management or special housing agreements between a private management company and AHA. This Deconcentration Policy shall not strictly apply to those communities where the public housing units are under separate HUD endorsed agreements including, but not limited to, Revitalization Agreements, Regulatory and Operating Agreements, HOPE VI Agreements, Development Agreements, or other similar agreements. Deconcentration and incoming mixing at such communities will be prescribed by such documents as well as tax credit related and other financing documents which normally require the communities to house a certain percentage of residents at income levels established under those programs. Moreover, this Deconcentration Policy shall not apply to communities, properties or interests in properties, owned, operated, or financed by AHA where no HUD restricted funds, or HUD funds at all, were used.

C. REFERENCES FOR DECONCENTRATION POLICY.

Quality Housing and Work Responsibility Act of 1998; Initial Guidance, Notice (February 18, 1999).

Admissions and Continued Occupancy Policy (October 1, 1999 version).

Rule to Deconcentrate Poverty and Promote Integration in Public Housing; Final Rule (Federal Register, Vol. 65, No. 247, December 22, 2000)

D. DECONCENTRATION POLICY.
AHA shall design policies and practices which provide for deconcentration of poverty and income mixing, by, to the extent possible, encouraging residents with higher

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1This Economic Deconcentration and Income Mixing Policy was approved in its original form by AHA’s Board of Commissioners at its June 16, 1999 regular meeting.
incomes to choose to move into public housing communities where there is a concentration of lower income residents, and encouraging residents with lower incomes to choose to move into public housing communities where there is concentration of higher income residents. AHA will address this goal by:

1. **Applicant Offers of Housing.**  
   When making offers of specific housing units in specific developments to applicants, AHA will consider available means which will best promote the objectives of attaining, to the maximum extent feasible, a resident body in each community that is composed of families with a broad range of incomes and avoiding concentrations of the most economically deprived families with serious social problems. These objectives will be factors taken into consideration: (i) when determining whether to offer a unit to an applicant that qualifies for a local preference, and (ii) when a determination is made to offer the unit to an applicant that qualifies for a local preference, in selecting among such qualified applicants. AHA shall seek to implement its selection procedures in such a manner that the number of residents, in each community, within certain income ranges will, over time, approximate, to the extent possible, the income distribution based on the Low-Income census information, or other such income distribution as may be necessary to make selected developments more economically viable.

2. **Ranking Preference.**  
   AHA shall use an Income Ranking Preference in an effort to achieve a broad range of incomes and a resident group, in each community, which promotes a balanced socio-economic mix and fiscal stability. This effort shall be tempered by the realization that each applicant and resident has the right to exercise choices that may not foster AHA’s Deconcentration Policy.

3. **Federal Preferences.**  
   As AHA will focus more specifically on promoting a socio-economic mix and fiscal stability to its communities, AHA will no longer use any of the former Federal Preferences to rank or order applicants on its Waiting List.

4. **Other Programs and Initiatives.**  
   AHA shall study the appropriateness of implementing other programs and initiatives that are designed to attract the desired economic mix of residents in its communities as may be suggested or authorized by HUD.

E. **AMENDMENTS.**  
The Executive Director may amend this Deconcentration Policy, at any time, when such amendment(s), in her discretion, are warranted, required or advisable.

F. **EFFECTIVE DATE.**  
This Deconcentration Policy was initially effective as of June 16, 1999.
1. **OVERVIEW.**
Section 504 of the Rehabilitation Act of 1973, 29 U.S.C.A. §794, et. seq. ("Section 504"), requires all agencies receiving federal financial assistance (e.g., public housing and some privately-owned housing) to adopt appropriate measures to allow individuals with disabilities to participate in and benefit from programs and activities administered by such agencies to the same extent as participants without disabilities. The Americans with Disabilities Act of 1990, 42 U.S.C.A. '12101-12213 ("ADA") also addresses, among other things, accessibility requirements in public accommodations for persons with disabilities.

The Housing Authority of the City of Atlanta, Georgia ("AHA") receives federal financial assistance for all of its major programs and is therefore subject to Section 504 and ADA. Moreover, AHA is wholly committed to the goals of these and related statutes and regulations and desires to highlight that commitment, to the largest extent possible, with the adoption of this policy on access to AHA facilities and programs (the "Accessibility Policy").

2. **GENERAL POLICY STATEMENT.**
AHA shall use reasonable efforts to assist individuals with disabilities who are applicants, residents of AHA communities, AHA employees and visitors to AHA offices and communities to participate in AHA programs on the same basis as individuals who do not have such disabilities. AHA will make reasonable and necessary accommodations for individuals with disabilities so that each such individual may participate in a meaningful manner, and benefit from, all AHA-sponsored programs and activities. These reasonable accommodations shall extend to AHA’s applications procedures, program participation and facilities enhancement activities. AHA also has the goal of achieving, to the extent possible, an enhanced level of visitability to its properties and renovated units of AHA property which are not otherwise subject to ADA or Section 504 requirements.

3. **KEY DEFINITIONS.**
For the purposes of the Accessibility Policy the terms “Disability” and “Reasonable Accommodations” shall have the following meanings:

A. **Disability.** “disability” shall mean an individual with disabilities who (i) has a physical or mental impairment that substantially limits one or more major life

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1. This Accessibility Policy was originally approved by the Board of Commissioners of The Housing Authority of the City of Atlanta, Georgia, at its August 27, 1997 Regular Meeting.
activities; (ii) has a record of impairment such as a history of a disability or misclassification as having a disability; or (iii) is regarded as having an impairment (i.e., a reasonable person treats the person as if he or she has an impairment whether or not the person actually does). Any such disability must adversely impact the individual’s ability to fully participate in the AHA program or activity. The term “disability” shall also encompass the term “handicapped individual” which includes any individual who (i) has a physical or mental disability which for such individual constitutes or results in a substantial handicap to employment and (ii) can reasonably be expected to benefit in terms of employability from vocational rehabilitation services provided pursuant to subchapters I and II of the Rehabilitation Act of 1973, as amended and the further definitional provisions set forth in 29 U.S.C. §706(7)(A) and (B). The term “disability” shall also encompass the term “Individual with Handicaps” and “Qualified individual with handicaps” as those terms are defined in 24 C.F.R. §8.3.

B. Reasonable Accommodations. “Reasonable Accommodations” shall mean those accommodations and reasonable adjustments AHA may make to allow individuals with disabilities to enjoy the benefits of AHA programs and activities. An accommodation or adjustment is not a “reasonable accommodation” if it is unduly costly or burdensome or one where the benefit of the proposed accommodation does not enhance the ability of the individual with disability to fully participate in the AHA program or activity.

C. Visitability. “Visitability” shall mean the efforts AHA will make to provide disabled residents and visitors, to the extent feasible, with the maximum potential for community interaction by meeting an increased level of access to such disabled residents and visitors. In meeting this increased level of access, AHA will facilitate upgrades of entrances at grade and interior door width and clearance concerns. AHA shall have a goal of increasing, to the extent feasible, the “visitability” categorization of its properties undergoing rehabilitation which are not otherwise subject to the provisions of Section 504 or ADA.

4. AREAS AFFECTED BY THE ACCESSIBILITY POLICY
AHA contemplates making reasonable accommodations for the benefit of disabled individuals who visit, work or live on AHA properties. In addition, AHA will encourage private landlords who participate in the Special Housing programs administered by AHA to comply with the goals of the Accessibility Policy to the greatest extent feasible. The Accessibility Policy shall impact on and be applied to, all of AHA physical and programmatic areas, including, but not limited to, the following AHA programs and activities:

A. Pre-employment and Employment Activities
AHA shall assist all applicants in the pre-employment application process. AHA shall use its best efforts to make reasonable accommodations for its current employees with disclosed disabilities so that such individuals may perform their duties as fully as employees without disabilities.
B. **Program Participation Activities.** AHA shall assist all applicants in the pre-application process for the public housing, the special housing and other programs. AHA shall request, orally or via the written pre-application process, each applicant to identify any special needs which the applicant may have which would impact his or her ability to complete the pre-application process. AHA shall use all reasonable efforts to make reasonable accommodations for its residents or program participants who disclose a disability to AHA.

C. **Facilities Enhancement Activities.** To the greatest extent feasible, an AHA staff person shall be assigned to facilitate compliance with the design and construction requirements for new construction and for renovation and rehabilitation set forth in the U.S. Department of Housing and Urban Development regulations, so that individuals with disabilities may have greater access to common-use areas such as building lobbies, lounges, halls and corridors, elevators and public use restrooms.

D. **Individual Units.** To the greatest extent feasible, an AHA staff person shall be assigned to facilitate compliance with the design and construction requirements for new construction and for renovation and rehabilitation set forth in the U.S. Department of Housing and Urban Development regulations, so that individuals with disabilities may have greater access into and through individual dwelling units. To the extent feasible, AHA shall also assign disabled families to AHA units already equipped to meet the needs of a disabled family and shall not isolate or segregate such participants.

E. **Assistance Upon Request/Notice.** Any reasonable accommodation made by AHA shall be at the request of the disabled family. While AHA may ask, pursuant to this Policy, whether an applicant, resident, or participant needs assistance in obtaining the full benefits of an AHA program or activity, AHA shall not be under an obligation to “discover” an applicant’s, resident’s or participant’s disability, or assume the presence of any such disability. To the extent a disability is disclosed to AHA, AHA shall allow the applicant, resident or participant to bring or utilize third parties to assist the applicant, resident or participant to receive the full benefits of an AHA program or activity. Such participation by third parties may include, but not be limited to, a sign language interpreter obtained by the applicant, resident or participant for a hearing or attending a meeting at an AHA facility. Any compensation for such third parties shall be borne by the applicant, resident or participant. AHA shall also install a TDD telephone system for the benefit of hearing impaired applicants to the public housing or special housing programs.

F. **Documentation of Disability.** AHA may also require any applicant, resident or participant who claims that a disability adversely impacts his or her ability, although otherwise qualified, to participate in an AHA program or activity to provide AHA with documentation from a medical doctor substantiating the disability and suggesting reasonable accommodations which AHA may consider employing.
5. **IMPLEMENTATION OF THE ACCESSIBILITY POLICY**  
The Executive Director or her designee(s) shall be responsible for implementing the Accessibility Policy and its goals and shall direct the heads of all AHA departments to conduct a thorough review of their policies and procedures to ensure that they are complying with the letter and the spirit of Section 504, ADA and AHA’s visitability goals. Further, the Executive Director may enact such other policies or plans as may be necessary or advisable to carry out the letter and spirit of the Accessibility Policy without the further vote or approval of the Board of Commissioners.

6. **EFFECTIVE DATE AND AMENDMENTS**  
The effective date of the Accessibility Policy shall be September 2, 1997. The Executive Director may amend or modify this Accessibility Policy at any time, provided that such amendments or modifications do not amount to a material change in the basic tenets of the Policy, without a vote by the Board of Commissioners.

7. **REPORTING GOALS**  
The Executive Director shall make periodic reports to the Board of Commissioners on AHA’s efforts to meet the goals of Section 504, ADA and similar statutes and State and local building codes and the goals expressed in this Accessibility Policy.

[END]
ATTACHMENT 3

AFFORDABLE HOUSING COMMUNITY
SITE-BASED WAITING LIST POLICY

1. INTRODUCTION.
The Housing Authority of the City of Atlanta, Georgia ("AHA") will use this Affordable Housing Community Site-Based Waiting List Policy ("Policy") to set forth the policy governing the administration of the Site-Based Waiting Lists at:

One or more of AHA’s current thirty-four (34) conventional public housing communities, which serve eligible low income, very low income and extremely low income families (herein, collectively, the “Affordable Housing Communities”).

The AHA will cause this Policy to be implemented in a fair and equitable manner. AHA will use this Policy to ensure consistency in the administration of each independent site-based waiting list for each Affordable Housing Community ("Community"). Each of AHA’s Affordable Housing Communities will be operated with fully independent site-based waiting lists administered according to this Affordable Housing Site-Based Waiting List Policy.

This Policy describes the general operating principles of each Affordable Housing Community site-based waiting list and is designed to assure general consistency in the application of the guiding principles established by the United States Department of Housing and Urban Development ("HUD") under its pertinent law and regulations as reflected in this Policy. Each of AHA’s Affordable Housing Communities is managed by a professional privately owned property management company (herein, the “Private Management Agent”). This Policy provides a framework for the operations at each of AHA’s Affordable Housing Communities. The Management Plan with the Private Management Agents, approved by AHA (herein, the “Management Plan”), for each Community will provide additional details on the operation of each Community’s Site-Based Waiting List.

2. PURPOSE.
AHA has adopted and is implementing the site-based waiting list approach to strengthen the concepts of community improvement and family self-sufficiency within each Affordable Housing Community. Applicants will be provided with the opportunity to select the housing of their choice. Applicants will have the opportunity to review the location, amenities, job opportunities, social programs, schools, and neighborhoods to determine interest in the specific Affordable Housing Community.

This proactive step is the beginning of the applicants’ move toward family self-sufficiency and economic independence. Applicants will select the Affordable Housing Community of their choice and make a conscious decision to commit to the Community, instead of just taking the housing offered without any applicant role in the selection of...
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the housing. AHA believes such empowerment will allow applicants to experience a profound sense of pride, which comes from the responsibility for selecting housing suitable for an applicant’s family. At the time of selection, a relationship between the Property Manager at each Community and the applicant will be established. AHA expects this pride and relationship to extend to the applicant’s maintenance and respect for the family’s apartment and the overall Community.

3. OPENINGS AND CLOSINGS OF THE WAITING LIST
The waiting list for each community will be opened following a public notice in a newspaper of general public circulation. The public notice will contain the following information:

A. Site Location,
B. Application Procedure - (Lottery, Date/ Time, etc.),
C. Availability of unit sizes,
D. Identification of basic eligibility criteria for applicants,
E. Fair Housing Logo or statement, and
F. Accessibility Logo or statement.

AHA will review the basic text and organization of the proposed advertisement as a part of the review of the Private Management Agent’s management plan and marketing plan for the community. The Management Company will be responsible for maintaining copies of all advertisements in a marketing file. The Management Company will advise the AHA of its intention to open a site-based waiting list, in writing, before the opening of the site-based waiting list. The Private Management Agent will format this notice in a method to allow prominent public posting of the information in AHA’s Central Office. This posting will allow any applicants who visit the Central Office to be informed about the full array of housing opportunities that are available from time to time.

The Private Management Agent will also assure the publication of the opening or closing of the site-based waiting list in selected newspapers of general public circulation and minority orientation and circulation to broaden the impact of the marketing efforts. The selection of such newspapers will be in accordance with the marketing plan of the Private Management Agent.

If the Private Management Agent closes the site-based waiting list due to an excess of applicants that cannot be reasonably served in the foreseeable future, the closing of the waiting list will be publicized in a newspaper of general public circulation. The Private Management Agent will provide advance written notice to the AHA of the closing. The Private Management Agent will again format the notice in a method to allow prominent public posting of the information in AHA’s Corporate Office.

4. APPLICATION PROCESS
Applicants will follow the procedures specified by the Private Management Agent in the completion of the pre-application, application, consents, related documents, and verifications.
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5. MANAGEMENT OF THE SITE-BASED WAITING LIST.
   The Private Management Agent will organize the site-based waiting list in the manner described in the management plan for the site. The Private Management Agent will maintain the information supporting the site-based waiting list organization at the site. This information may include a pre-application form, application form or other similar documents. The Private Management Agent will select the applicants from the waiting list for review and consideration in accordance with the procedures set forth in AHA’s Admissions and Continued Occupancy Policy (“ACOP”), and the Private Management Agent’s management plan. Selections will be in writing and will be documented in the files of the applicants. Appropriate verifications will be maintained at the site. Applicants physically unable to complete an application at the site due to disabilities or handicaps will be afforded the opportunity initially to apply in writing by mail or by telephone. However, applicants selected for interviews will be required to attend an appointment at the site to provide required verifications for occupancy consideration.

   If an applicant states that the applicant is unable to apply in person at a site due to the disability of the applicant, then AHA may facilitate the application by providing the applicant with a referral card. The referral card may be directed to the community to which the individual desires to place an application. This referral card will enable the Private Management Agent in the community to send an application directly to the applicant. The applicant will return the completed application directly to the site, preferably in person, or in special circumstances, by mail. Once the applicant is being considered for placement in the community, the application will receive final processing in the community and the applicant may be required to visit the community to complete the application processing, and eligibility and suitability determinations.

6. SELECTION PREFERENCES - LOCAL AND RANKING.
   The Private Management Agent will provide information on the local and ranking preferences to be used in the selection of families at the site. This information will be contained in the management plan for the site. AHA will review and approve any additional preferences in advance. Generally, the preferences will coincide with the local and ranking preferences adopted by AHA. Private Management Companies will be required to use the preferences specified in the Management Plan unless AHA has provided other specific approval. If the preferences vary significantly from the policies provided in the ACOP previously provided to HUD, then AHA will review these preferences with HUD before that use.

7. ORDER OF APPLICANTS.
   The method of opening the site-based waiting list will determine the organization of applicants on the waiting list. Site-based waiting lists sorted by lottery will be placed in a numerical order with the appropriate organization within the preferences. Waiting lists placed by date and time order will be organized in this manner with the appropriate organization within the preferences.

   AHA will provide applicants on the waiting list as of December 21, 2001, with the opportunity to maintain their date and time order in the development of any original
site-based waiting lists. AHA will facilitate this process by providing information on AHA applicants as of December 21, 2001, to each Private Management Agent opening a site-based waiting list. The information provided by AHA will include the applicant’s name, social security number, and the date and time of application.

The Private Management Agent will use this information to place applicants on the site-based waiting list in the date and time order, within each preference, appropriately ranked, specified according to the applicants’ verified preference status, if any. Applicants will be required to advise the Private Management Agent of any previous application with AHA in order to enable the Private Management Agent to use this previous date and time. Applicants will be advised that although an applicant has maintained the date and time order of the application originally placed with AHA, applicants will be selected according to the specific selection preferences of the site, as approved by AHA. In order to take advantage of this special site-based waiting list option, applicants must apply to the desired site-based waiting list(s) on or before March 31, 2002. Thereafter, this special site-based waiting list option process will be terminated and applicants will be given a date and time based on the date and time the applicant actually applied to the particular site-based waiting list(s). In this manner, AHA will provide each of the long-standing preexisting applicants to AHA who shows reasonable initiative, an equitable opportunity to secure a public housing-assisted unit. This option process will also demonstrate AHA’s commitment to continue housing at least 40% of its new admissions from very low and extremely low-income families.

As a one-time action, AHA will advise each applicant on the waiting list as of December 21, 2001 of the following information:

A. There will be site-based waiting lists in the future upon which current applicants to AHA public housing can place an application.

B. Applicants will be able to use their current date and time position on the AHA waiting list for the application at the site-based waiting list, subject to local and ranking preferences.

C. Applicants must advise the Private Management Agent at the site-based waiting list location that they applied for housing with the AHA on or before December 21, 2001. This will enable the Private Management Agent to secure the correct information from AHA on the applicant’s previous application date and time.

D. Upon applicant’s request, AHA will specify to an applicant the date and time of application for the applicant’s files.

8. SCREENING CRITERIA.
The screening criteria for the Affordable Housing Communities will be described in the Private Management Agent’s Management Plan. Generally, the criteria will follow AHA’s ACOP, but may vary to meet the needs of the community. The criteria will be
designed objectively to screen applicants for housing to ensure the placement of persons prepared to meet the conditions of the lease and family self-sufficiency and economic independence obligations as required. The general method of obtaining informal reviews of eligibility, suitability, placement, and screening decisions is set forth in the ACOP. Site-based policies and management plans will address the mechanics of requesting an informal review of the eligibility, suitability, placement, and screening decision(s).

9. UNIT OFFERS AND REJECTIONS
AHA intends that the Affordable Housing Communities will operate with a large degree of independence to foster the specific goals of each Affordable Housing Community. Unit offers will be made in accordance with the method generally specified in the ACOP as more specifically detailed in the management plan and related site-based policies. Generally, the Private Management Agent will afford an applicant that has successfully completed the screening process and has reached the top of a particular waiting list, an opportunity to lease the next available unit(s) which meets the need of the applicant. Unit offers will be accomplished in the order of placement on the site-based waiting list to the extent administratively feasible. If an applicant rejects the unit(s) offered, the applicant will lose his or her place on the waiting list will be removed from the site-based waiting list. Said rejection will not automatically affect the position of the applicant on any other site-based waiting list for any other Affordable Housing Community.

10. DISTRIBUTION OF INFORMATION - AHA AND SITES
AHA will maintain information on the availability of the various AHA Affordable Housing Community site-based waiting lists. Information available in the AHA Central Office will include the dates of all open site-based waiting lists and basic information on the specific sites. Site information will include the locations, unit sizes, amenities, and accessibility for handicapped or disabled persons. AHA may maintain this information in a telephonic, web-based, electronic, or print format. AHA will maintain the appropriate fair housing information.

Each site will make available appropriate leasing information related to on-site amenities, facilities, community and supportive services, schools, and accessibility for handicapped or disabled persons at the site. Required Fair Housing information will be maintained at all times.

11. AHA APPLICATIONS AND PUBLIC NOTICES.
AHA’s application form for the Affordable Housing Program will include an advisory notice to the applicant that additional sites may exist or will exist in the future, for which an applicant may apply for a public housing apartment. The notice will also indicate that applicants must apply directly to the site in order to have a position on the site-based waiting list for that particular Affordable Housing Community.

Future openings of the AHA waiting lists will include a statement as to where applications may be placed. In addition, the advertisement announcing future openings
of any site-based waiting list will be noticed, at a minimum, in a newspaper of general circulation and at AHA’s Corporate Office. As stated above, the AHA’s Corporate Office will maintain this information in a public manner.

12. **PURGING OF WAITING LISTS.**
Each Private Management Agent will periodically purge the site-based waiting list to update information on applicants for the public housing program. Generally, a letter is mailed to the applicant with a requirement to be returned to the Private Management Agent within a specific time. The returned letter includes basic information updates and an affirmative statement that advises of the continued interest of the applicant in the public housing program or a public housing-assisted unit. Applicants who do not respond to the letter are removed from the site-based waiting list. In the future, the Private Management Agent will include information in the letter to the applicants on the other existing site-based waiting lists to advise them of the ability to apply for public housing in the various sites with site-based waiting lists. The letter will also advise the applicant that other site-based waiting lists may open by public notice in the newspaper. Applicants will also be advised that the AHA’s Corporate Office maintains information on site-based waiting lists.

13. **TRANSFERS.**
Generally, all transfers will be resolved within each individual Affordable Housing Community or in special cases, within another Affordable Housing Community managed by the same Private Management Agent, or in even more special cases, within another AHA Affordable Housing Community. Residents may request transfers following the conditions specified in the site-based transfer plans and as set forth in AHA’s ACOP. Private Management Companies will address these requests in accordance with the policies specified. Existing residents will not be transferred to the Mixed-Income, Mixed-Finance or Olympic Legacy communities, except as returning affected residents under revitalization relocation efforts of AHA.

14. **REVIEW OF SITE OPERATIONS.**
AHA will provide for oversight of the site-based waiting list through several different methods, including, but not limited to, audits, technical assistance and training, file reviews, periodic reports and testers. Private Management Companies will provide periodic reports to AHA on the screening and leasing efforts. These reports provide information on eligibility and suitability screening, administrative hearings, occupancy, leasing, work orders, unit turnaround, financial status, and such other matters as AHA may deem appropriate. AHA will review these documents, reports and statements regularly.

15. **DOCUMENT RETENTION.**
The applicable management plans, and the marketing plans will specify the document retention policies required by HUD regulations, or by AHA. These records generally include but are not limited to: the related application documents, advertisements, site-based waiting lists, placement offers, publications, and letters to applicants. AHA will ensure the review of these documents to determine the accurate utilization of the site-
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based waiting list by the Private Management Agent. Document retention review may be accomplished by an independent auditor, AHA professionals, management reviews conducted by private agents contracted to perform these reviews, or such other method, as AHA may deem appropriate. If AHA determines problems with the operation of the site-based waiting list, AHA will undertake the appropriate measures to resolve said problems.

16. **EFFECTIVE DATE**
This Policy was effective immediately upon its adoption by the Board of Commissioners of AHA at its regularly scheduled January 30, 2002 meeting, subject to any concurrence by HUD, if applicable.

[END]
ADMISSION PLAN FOR POLICE OFFICERS AND OTHER SECURITY PERSONNEL TO RESIDE IN PUBLIC HOUSING

1. PURPOSE.
The purpose of this Admission Plan for Police Officers and Other Security Personnel to Reside in Public Housing (the “Plan”) is to outline the procedures for admitting police officers and other security personnel into public housing.

2. SCOPE.
This Plan’s objective is to permit the admission to public housing of police officers and other security personnel, who are not otherwise eligible for such housing under the normal admission requirements or procedures of the Housing Authority of the City of Atlanta, Georgia (“AHA”), and to set forth standards and criteria for the approval of such plans.

3. OBJECTIVE.
The objective of this Plan is to grant exemption to qualified police officers and other security personnel for long term residency in Atlanta Housing Authority communities, where their physical presence is expected to serve as a deterrent to criminal activity in and around public housing.

4. DEFINITIONS.
A. Eligible Families.
Eligible families means families that are eligible for residence in public housing assisted under the United States Housing Act of 1937.

B. Officer.
Officer means a professional police officer or other professional security provider. Police officers and other security personnel are considered professional if they are employed full-time, (i.e., not less than 35 hours per week), by a governmental unit or a private employer and compensated expressly for providing police or security services. As used in this subpart, “officer” may refer to the Officer as so defined or to the Officer and his or her family taken together, depending on the context.

C. Plan.
Plan means the written plan submitted by a public housing agency (PHA) to the United States Department of Housing and Urban Development (the “department”), under which, if approved, the Department will exempt Officers from the normal eligibility requirements for residence in public housing and allow Officers, who are otherwise not eligible, to reside in public housing apartments. A Public Housing Authority may have only one plan in effect any one time, which will govern exemptions under this subpart for all public housing owned and managed by that Housing Authority.

5. CONDITIONS FOR EXEMPTION.
Conditions for exemption - The AHA may exempt Officers from the eligibility...
requirements for admission to public housing, provided that:

A. **Exemption Necessary.**

The Officers would not be eligible, under any other admission requirements or procedures, for admission to the public housing community without such an exemption; and

B. **Approved Plan.**

The exemption is given under a properly submitted plan that satisfies the standards and criteria set forth in 24 C.F.R. §960.507 of this part and, accordingly, has been approved by the AHA.

C. **Lease/Reference Checks.**

The Officers will be subject to a written lease and will undergo a reference check to include: (i) Employment Verification; (ii) Previous Landlord Verification; (iii) Criminal History Verification; and (iv) Personal Reference Verification

6. **APPLICABLE COMMUNITIES FOR ADMISSION PLAN OF POLICE OFFICERS.**

This Admission Plan shall apply to each of the following fourteen (14) communities currently owned by AHA, and to such other communities as AHA may specify in the future: (i) Bankhead Courts; (ii) Bowen Homes; (iii) Capitol Homes; (iv) Carver Homes; (v) Englewood Manor; (vi) Harris Homes (currently under plans for redevelopment); (vii) Grady Homes; (viii) Hollywood Courts; (ix) Jonesboro South; (x) Martin Street Plaza; (xi) McDaniel Glenn; (xii) Perry Homes (currently under plans for redevelopment); (xiii) Thomasville Heights (currently under plans for remediation); and (xiv) University Homes.

7. **JUSTIFICATION FOR ADMISSION PLAN.**

Atlanta is the state capital and largest city in the State of Georgia, and is located in the northwest section of the state. Atlanta is a newly developed mixed-income community rich in cultural diversity with a population of 394,017, and a metropolitan area of 2,833,511 (1990). Located in one of America’s fastest-growing areas, Atlanta is also one of the largest commercial, industrial, and financial centers in the Southeast U.S., as well as a transportation hub and a convention center. As a reflection of its commercial and international recognition, Atlanta was the site of the 1996 Summer Olympics.

Rapid growth and commercial strength are sometimes accompanied by negative effects. If there is a downside to Atlanta, it is the crime rate. This Admission Plan for Police Officer seeks is one strategy to address this negative downside as it relates to public housing. The location of public housing and the type of community can affect crime victimization opportunity. Multi-family housing communities located in close proximity to major transportation routes, urban population centers, and recreation places are the most victimized communities. These locations provide easy entry and egress points and are more difficult for security personnel to patrol.

8. **AHA’S ROLE IN SECURITY.**

The AHA is the primary guardian of housing authority premises and places the safeguarding the welfare of residents as one of its primary aims. The following are key components of AHA’s role in improving and maintaining security in public housing.
A. Greater visibility of protective services officers through improved operating conditions for protective security officers availed through the installation of a Command Center for centralized electronic monitoring of targeted AHA sites. This enables guards residing on the site to provide a rapid response to calls for services or other emergencies, conduct physical security and safety inspections, and conduct security tours.

B. Increased resident crime prevention training with assistance from local law enforcement.

C. Increased resident training and promotion of accessing law enforcement resources to improve security on AHA premises.

D. Participation on housing authority premises with security improvement teams through direct contact with AHA Protective Services to provide supplemental security services (including foot patrols) in public housing.

E. Provide emergency backup support for AHA’s contract security operating on public housing premises when requesting emergency law enforcement officer assistance.

F. Support of housing authority resident security initiatives through proactive liaison and communications methods to include the availability of rapid communication exchange through enhanced 911, dedicated lines, hot buttons, or radio and telephone communications.

G. Provide law enforcement support for short-term situations that may impact the safety and security of housing authority residents that may be impacted by community calendar events, weather, disaster, and other situations.

H. Participation and support of public relations improvement activities with housing residents such as police athletic leagues, etc.

I. Control entrances and movement of pedestrian vehicular and foot traffic.

J. Routinely monitor common areas.

K. Monitor general area activity through frequent foot patrols.

L. Enforce housing authority rules: e.g., banning, trespass, loitering, noise, litter, resident and vendor ID, and resident vehicle registration.

M. Routinely conduct security inspections of property noting and reporting lights out, fencing in need of repair, graffiti to be removed, general nuisance activities and structures to be remedied.

N. Liaison with local police to facilitate community-oriented policing and security functions through increased positive crime prevention associations with residents.

O. Provide targeted assistance to AHA Protective Services, as assigned.

9. **COMMUNITY BENEFIT.**

The communities wherein police officers or other security personnel will be living play a key role in improvement and maintenance of safety in public housing. Police officers or other security personnel living in public housing can provide assistance in the forms of neighborhood involvement, zone enforcement, code enforcement, collaborative problem solving, and grant teaming possibilities. Under this plan, AHA will further enhance its ability for improved public
housing security in a strategy that is dependent on developing quality and meaningful relationships between housing operations, law enforcement, security, residents, and the community. Law enforcement visibility in the community will encourage community involvement, increase public housing resident’s and the community’s confidence in law enforcement, public housing, community’s support of AHA programs and objectives. Strategically placing the officers in the communities noted in this plan will benefit the targeted community, neighboring AHA community and those in close proximity.

10. PHYSICAL AND SOCIAL ASSESSMENT.
AHA has conducted a physical and social assessment of the AHA communities and believes that placing police officers and other security personnel in those communities would address many of the concerns mentioned in the assessment.

11. RESTRICTIONS AND PROHIBITIONS.
A. Purpose.
This section sets forth the restrictions and prohibitions for police officers and other security personnel in public housing.

B. Restrictions.
1. Proximity to Other Residents. The dwelling unit to be allocated to Officers shall be situated so as to place the Officers in close physical proximity to other residents.

2. Transfer of Residents. No resident families will be transferred to other apartments in order to make available the apartments to be allocated to Officers. Residents may voluntarily consent to transfer.

3. Lease. The apartments allocated to Officers shall be routed under a lease that contains the terms described in 24 C.F.R. Chapter 960.509.

4. Apartment Allocation. The number of apartments to be allocated to Officers does not exceed the limits set forth in 24 C.F.R. Chapter 960.507(c) or in the alternative, any apartments so allocated in excess of the applicable maximum number of vacancies for which there are no eligible families.

C. Prohibitions.
Only personnel that are employed full-time (35 hours or greater per week) by a law enforcement agency or recognized private security agency or company shall be considered for this program.

1. Continuance of Employment. The Officers right of occupancy is dependent on continuation of the employment that qualified the Officer for residency in the community.

2. Termination of Occupancy. The lease shall provide that the Officer will move out of the leased unit within a reasonable, prompt time, to be established by the lease, after termination of employment.

[END]
13-1. INTRODUCTION.

The Housing Authority of the City of Atlanta, Georgia ("AHA") will use a site-based waiting list for on-site and off-site public housing replacement units developed and/or acquired as a part of the Olympic Legacy Program. The Olympic Legacy Program involves the comprehensive revitalization of five of its most distressed communities (Techwood Homes, Clark Howell Homes, East Lake Meadows, John Hope Homes and John Eagan Homes (collectively, the “Olympic Legacy Communities”) as mixed-income communities, all as are fully described in letters, dated February 5, 1996 and May 2, 1996, and November 14, 1996 and December 12, 1996 from AHA to the U.S. Department of Housing and Urban Development (“HUD”). The background and facts relating to the AHA’s agreement to use the site-based waiting list approach is managing the replacement housing units on and off-site for the Olympic Legacy Communities are set forth in the letters dated February 5, 1996, and May 2, 1996, and November 14, 1996 and December 12, 1996 from AHA to HUD, and in the HOPE VI Grant Agreement, dated August 12, 1995, as amended (“HOPE VI Grant Agreement”) HUD’s authorization and approval of using the site-based waiting list approach are set forth in its letters dated June 28, 1996 and December 13, 1996 to the AHA. AHA intends to implement these provisions in a method to fairly address the equity issues of the public housing eligible applicants for housing who were on AHA’s centralized waiting list as of September 10, 1996, and applicants since that date for housing at each site, including replacement housing sites. AHA will use this Site-based Waiting List Policy (“Waiting List Policy”) to ensure a measure of consistency in the administration of each independent site-based waiting list for public housing-assisted units.

On-site and off-site replacement public housing eligible units developed and/or acquired for the Olympic Legacy Communities will be operated with fully independent site-based waiting lists administered according to this Waiting List Policy. This Waiting List Policy describes the basic operational aspects of each site-based waiting list and is designed to assure general consistency in the application of the guiding principles established by HUD in the approval process. This Waiting List Policy is applicable only to those units of public housing contained within the Olympic Legacy Communities and those public-housing units designated at off-site replacement developments under the Olympic Legacy Program. The Waiting List Policy provides a framework for the operations at each of those sites. The management plans and marketing plans for the sites will provide additional details on the operation of the particular site-based waiting list.

To the extent that this Waiting List Policy is in conflict with provisions in the Further Assurances Agreements (or the Redevelopment Cooperative Agreement in the case of

\[1\] This Site-based Waiting List Policy was originally effective on December 13, 1996.
East Lake Meadows) for any Community, the provisions of the particular Agreement will govern to the extent of the conflict.

13-2. **PURPOSE.**

AHA is using the site-based waiting list approach to strengthen the concepts of community improvement and family self-sufficiency within each of the replacement housing sites. Applicants will be provided with the opportunity, proactively, to select the housing of their choice. Applicants will have the opportunity to review the location, amenities, job opportunities, social programs, schools, and neighborhoods to determine interest in the specific community.

This proactive step is the beginning of the applicants’ move toward family self-sufficiency. Applicants will select the housing of their choice and make a conscious decision to commit to the community, instead of just taking the housing offered without any applicant role in the selection of the housing. Such empowerment will allow applicants to experience a profound sense of pride which comes when one takes responsibility for selecting housing suitable for an applicant’s family. At the time of selection, a relationship between the Property Manager and the applicant will be established. AHA expects this pride and relationship to extend to the applicant’s maintenance and respect for his or her apartment and the overall community. As a condition for living in any Olympic Legacy Community, on-site or off-site, applicants will agree to participate in the self-sufficiency program with supportive services. The self-sufficiency program is mandatory with certain limited exceptions.

13-3. **OPENINGS AND CLOSINGS OF THE WAITING LIST.**

The waiting list for each community will be opened following a public notice in a newspaper of general public circulation. The public notice will contain the following information:

A. Site Location;
B. Application Procedure - (Lottery, Date/ Time, etc.);
C. Availability of unit sizes;
D. Identification of basic eligibility criteria for applicants; and
E. Fair Housing Logo or statement.

AHA will review the basic text and organization of the proposed advertisement as a part of the review of the management agent’s management plan and marketing plan for the community. The management agent will be responsible for maintaining copies of all advertisements in a marketing file. The management agent will advise the AHA of its intention to open a site-based waiting list, in writing, before the opening of the site-based waiting list. The management agent will format this notice in a method to allow prominent public posting of the information in AHA’s Central Application Office. This posting will allow any applicants who visit the Central Office or place an application to be informed about the full array of other housing opportunities that are available from time to time.

The management agent will also assure the publication of the opening or closing of the waiting list in selected newspapers of general public circulation and minority orientation and circulation to broaden the impact of the marketing efforts. The selection of such
newspapers will be in accordance with the marketing plan of the management agent.

If the management agent closes the site-based waiting list due to an excess of applicants that cannot be reasonably served in the foreseeable future, the closing of the waiting list will be publicized in a newspaper of general public circulation. The management agent will provide advance written notice to the AHA of the closing. The management agent will again format the notice in a method to allow prominent public posting of the information in AHA’s Central Applications Office.

13-4. APPLICATION PROCESS.
Applicants will follow the procedures specified by the management agent in the completion of the application, related documents and verifications.

13-5. MANAGEMENT OF THE SITE-BASED WAITING LIST.
The management agent will organize the site-based waiting list in the manner described in the management plan for the site. The management agent will maintain the information supporting the waiting list organization at the site. This information may include a pre-application form, application form or other similar documents. The management agent will select the applicants from the waiting list for review and consideration in strict accordance with the procedures set forth in its management plan. Selections will be in writing and will be documented in the files of the applicants. Appropriate verifications will be maintained at the site.

Applicants physically unable to complete an application at the site due to disabilities or handicaps may be afforded the opportunity initially to apply in writing by mail. However, applicants selected for interviews may be required to attend an appointment at the site to provide required verifications for occupancy consideration.

If an applicant states that the applicant is unable to apply in person at a site, then AHA will facilitate the application by providing the applicant with a referral card. The referral card may be directed to the community to which the individual desires to place an application. This referral card will enable the site to send an application to the applicant. The applicant will return the completed application to the site by mail or in person. Once the applicant is considered for placement in the community, the application will receive final processing in the community and the applicant may be required to visit the community to complete the application processing and eligibility determination.

13-6. SELECTION PREFERENCES - LOCAL AND NONLOCAL.
The management agent will provide information on the preferences to be used in the selection of families at the site. This information will be contained in the management plan for the site. AHA will review and approve these preferences in advance. Generally, AHA expects that the preferences will coincide with the local preferences adopted by AHA in its current Admissions and Continued Occupancy Policy (“ACOP”). Management agents will be required to use the preferences specified in the ACOP unless AHA has provided other specific approval. If the preferences vary significantly from the policies provided in the ACOP previously approved by HUD, AHA will review
these preferences with HUD before their use.

13-7. ORDER OF APPLICANTS.

The method of opening the waiting list may determine the organization of applicants on the waiting list. Waiting lists sorted by lottery will be placed in a numerical order with the appropriate organization within the preferences. Waiting lists placed by date and time order will be organized in this manner with the appropriate organization for preferences. In either event, returning residents pursuant to a particular Further Assurances Agreement (or Redevelopment Cooperative Agreement, in the case of East Lake Meadows), will be placed on the applicable site-based waiting list prior to the placement of non-returning residents or other applicants on that applicable site-based waiting list.

AHA will provide applicants on the waiting list as of September 10, 1996, with the opportunity to maintain their date and time order in the development of site-based waiting lists. AHA will facilitate this process by providing information on AHA applicants as of September 10, 1996, to each management agent opening a site-based waiting list. The information provided by AHA will include the applicant’s name and the date and time of application.

The management agent will use this information and place applicants on the site-based waiting list in the date and time order specified according to the applicants’ verified preference status, if any. Applicants will be required to advise the management agent of any previous application with AHA in order to enable the management agent to use this previous date and time. Applicants will be advised that although an applicant has maintained the date and time order of the application originally placed with AHA, applicants will be selected according to the specific selection preferences of the site, as approved by AHA. This process will be terminated as soon as the effective date of applications on the waiting list exceeds the September 10, 1996 date. In this manner, AHA will provide each of the long standing preexisting applicants to AHA an equitable opportunity to secure a public housing-assisted unit.

As a one time action, AHA will advise each applicant on the waiting list as of September 10, 1996 of the following information:

A. There will be site-based waiting lists in the future upon which current applicants to AHA public housing can place an application.

B. Applicants will be able to use their current date and time position on the AHA waiting list for the application at the site-based waiting list.

C. Applicants must advise the management agent at the site-based waiting list location that they applied for housing with the AHA on or before to September 10, 1996. This will enable the management agent to secure the correct information from AHA on their previous application date and time.

D. Upon applicants’ request, AHA will specify to these applicants their date and time of application for their files.
13-8. **SCREENING CRITERIA.**
The screening criteria for the Olympic Legacy Communities may exceed the criteria of the Admissions and Continued Occupancy Policy of AHA. The criteria will be designed objectively to screen applicants for housing to ensure the placement of persons prepared to meet the conditions of the lease and family self-sufficiency obligations as required. Site-based policies and management plans will address the method of requesting an informal review of the screening decision.

13-9. **UNIT OFFERS AND REJECTIONS.**
AHA intends that the Olympic Legacy Communities will operate with a large degree of independence to foster the specific goals of a mixed income community. Unit offers will be made in accordance with the method specified in the management plan and related site-based policies. Generally, the management agent will afford an applicant that has successfully completed the screening process an opportunity to lease the next available unit(s). Unit offers will be accomplished in the order of placement on the site-based waiting list to the extent administratively feasible. If an applicant rejects the unit(s) offered, the applicant will lose his or her place on the waiting list in accordance with the site-based policies. Said rejection will not automatically affect the position of the applicant on any other waiting list for AHA housing whether site-based or centralized.

13-10. **DISTRIBUTION OF INFORMATION - AHA AND SITES.**
AHA will maintain information on the availability of site-based waiting lists. Information posted in the AHA Central Office will include the dates of all open site-based waiting lists and basic information on the specific sites. Site information will include the locations, unit sizes, amenities, and accessibility for handicapped or disabled persons. AHA will maintain the appropriate fair housing postings.

Each site will make available appropriate leasing information related to on-site amenities, facilities, social services, schools, and accessibility for handicapped or disabled persons at the site. Required Fair Housing information will be maintained at all times.

13-11. **AHA APPLICATIONS, PUBLIC NOTICES AND WAITING LIST PURGES.**
AHA’s application form for the public housing program will include an advisory notice to the applicant that additional sites exist or will exist in the future. The notice will also indicate that applicants must apply directly to the site in order to maintain a position on the site-based waiting list.

Future openings of the AHA waiting lists will include a statement that there will be other locations where applications may be placed. In addition, the advertisement will state that future openings of the waiting list will be noticed in a newspaper of general circulation and AHA’s Central Applications Office. As stated above, the AHA’s Application Office will maintain this information in a public display.

13-12. **PURGING OF WAITING LISTS.**
Each management plan will indicate when the management company will purge the site-based waiting list to update information on applicants for the public housing
program. Generally, a letter is mailed to the applicant with a requirement to be returned to the management company within a specific time. The returned letter includes basic information updates and an affirmative statement that advises of the continued interest of the applicant in the public housing program or a public housing-assisted unit. Applicants who do not respond to the letter are removed from the site-based waiting list. In the future, the management company will include information in the letter to the applicants on the existing site-based waiting list to advise them of the ability to apply for public housing in the various sites with site-based waiting lists or with AHA via its centralized waiting list. The letter will also advise the applicant that other site-based waiting lists may open by public notice in the newspaper. Applicants will also be advised that the Central Applications Office maintains information on site-based waiting lists.

13-13. TRANSFERS.
All transfers will be resolved within each individual Olympic Legacy Community. Residents may request transfers following the conditions specified in the site-based transfer plans. Management agents will address these requests in accordance with the policies specified. AHA will not transfer existing residents to these communities, except as returning residents under relocation efforts of AHA.

13-14. REVIEW OF SITE OPERATIONS
AHA will provide for oversight of the site-based waiting list through several different methods. Management agents will provide monthly reports to AHA on the leasing efforts. These reports provide information on occupancy, leasing, work orders, unit turnaround, and financial status. AHA will review these documents, reports and statements regularly.

The management plans, regulatory and operating agreements and the marketing plans specify document retention as required by the HUD regulations. These records include the related application documents, waiting lists, publications, and letters to applicants. AHA will ensure the review of these documents to determine the accurate utilization of the waiting list by the management agent. This review may be accomplished by an independent auditor, AHA staff, or management reviews conducted by private agents contracted to perform these reviews. If AHA determines problems with the operation of the site-based waiting list, AHA will undertake the appropriate measures to resolve said problems.

[END]
ATTACHMENT 6

MIXED-INCOME, MIXED-FINANCE COMMUNITY
SITE-BASED WAITING LIST POLICY ADDENDUM

14-1. INTRODUCTION.
The Housing Authority of the City of Atlanta, Georgia ("AHA") will use this Mixed-Income, Mixed-Finance Community Site-Based Waiting List Policy Addendum ("Addendum") to set forth the circumstances in which AHA will use a site-based waiting list. These circumstances include housing communities in which AHA assists directly, or indirectly, on-site and off-site public housing-eligible units developed and/or acquired as a part of a Mixed-Income, Mixed-Finance Community. This development and acquisition activity includes circumstances in which AHA is a sponsor, partner, and/or developer. AHA defines a Mixed-Income, Mixed-Finance Community to be a community that is:

- Developed, acquired or obligated, using public housing development funds and/or public housing operating funds, and using financial sources outside of the traditional public housing program; and

- In which the income levels of residents are mixed.

Such financial sources outside of the traditional public housing program include, but are not limited to, tax credits, bond financing, Community Development Block Grant, HOME Funds, state or local funds, private foundation funding, loans proceeds and other related forms of housing funding. The AHA will implement these site-based provisions in a fair and equitable manner. AHA will use this Mixed-Income, Mixed-Finance Community Site-based Waiting List Policy Addendum ("Addendum") to ensure a measure of consistency in the administration of each independent site-based waiting list for public housing-eligible units.

On-site and off-site public housing eligible units developed and/or acquired for the Mixed-Income, Mixed-Finance communities will be operated with fully independent site-based waiting lists administered according to this addendum to the Olympic Legacy Site-Based Waiting List Policy. This Addendum describes the basic operational aspects of each site-based waiting list and is designed to assure general consistency in the application of the guiding principles established by the United States Department of Housing and Urban Development ("HUD") in the approval process. This Addendum is applicable only to public housing-eligible units contained within the Mixed-Income, Mixed-Finance Communities. The Addendum provides a framework for the operations at each of those sites. The Management Plans and Marketing Plans for the sites will provide additional details on the operation of the particular Mixed-Income, Mixed-Finance Site-Based Waiting List.

1 This Mixed-Income Mixed-Finance Community Site-Based Waiting List Policy Addendum, in its original form, was effective as of June 25, 1999.
To the extent that this Addendum is in conflict with provisions in the Further Assurances Agreements for any community, the provisions of the particular Agreement will govern to the extent of the conflict.

14-2. PURPOSE
AHA is using the site-based waiting list approach to strengthen the concepts of community improvement and family self-sufficiency within each of the replacement housing sites. Applicants will be provided with the opportunity, proactively, to select the housing of their choice. Applicants will have the opportunity to review the location, amenities, job opportunities, social programs, schools, and neighborhoods to determine interest in the specific community.

This proactive step is the beginning of the applicants' move toward family self-sufficiency. Applicants will select the housing of their choice and make a conscious decision to commit to the community, instead of just taking the housing offered without any applicant role in the selection of the housing. Such empowerment will allow applicants to experience a profound sense of pride which comes when one takes responsibility for selecting housing suitable for an applicant's family. At the time of selection, a relationship between the Property Manager and the applicant will be established. AHA expects this pride and relationship to extend to the applicant's maintenance and respect for his or her apartment and the overall community. As a condition for living in any Mixed-Income, Mixed-Finance Community, on-site or off-site, applicants, except elderly and disabled, will be required to participate in the self-sufficiency program with supportive services. The self-sufficiency program will be mandatory with certain limited exceptions.

14-3. OPENINGS AND CLOSINGS OF THE WAITING LIST.
The waiting list for each community will be opened following a public notice in a newspaper of general public circulation. The public notice will contain the following information:
A. Site Location,
B. Application Procedure - (Lottery, Date/Time, etc.),
C. Availability of unit sizes,
D. Identification of basic eligibility criteria for applicants, and
E. Fair Housing Logo or statement.

AHA will review the basic text and organization of the proposed advertisement as a part of the review of the Management Agent's management plan and marketing plan for the community. The Management Agent will be responsible for maintaining copies of all advertisements in a marketing file. The Management Agent will advise the AHA of its intention to open a site-based waiting list, in writing, before the opening of the site-based waiting list. The Management Agent will format this notice in a method to allow prominent public posting of the information in AHA's Central Application Office. This posting will allow any applicants who visit the Central Office to place an application to be informed about the full array of other housing opportunities that are available from time to time.
The Management Agent will also assure the publication of the opening or closing of the
waiting list in selected newspapers of general public circulation and minority orientation
and circulation to broaden the impact of the marketing efforts. The selection of such
newspapers will be in accordance with the marketing plan of the Management Agent.

If the Management Agent closes the site-based waiting list due to an excess of applicants
that cannot be reasonably served in the foreseeable future, the closing of the waiting list
will be publicized in a newspaper of general public circulation. The Management Agent
will provide advance written notice to the AHA of the closing. The Management Agent
will again format the notice in a method to allow prominent public posting of the
information in AHA’s Central Applications Office.

14-4. APPLICATION PROCESS.
Applicants will follow the procedures specified by the Management Agent in the
completion of the application, related documents and verifications.

14-5. MANAGEMENT OF THE SITE-BASED WAITING LIST.
The Management Agent will organize the site-based waiting list in the manner described
in the management plan for the site. The Management Agent will maintain the
information supporting the waiting list organization at the site. This information may
include a pre-application form, application form or other similar documents. The
Management Agent will select the applicants from the waiting list for review and
consideration in strict accordance with the procedures set forth in its management plan.
Selections will be in writing and will be documented in the files of the applicants.
Appropriate verifications will be maintained at the site.

Applicants physically unable to complete an application at the site due to disabilities or
handicaps may be afforded the opportunity initially to apply in writing by mail or by
telephone. However, applicants selected for interviews may be required to attend an
appointment at the site to provide required verifications for occupancy consideration.

If an applicant states that the applicant is unable to apply in person at a site, then AHA
will facilitate the application by providing the applicant with a referral card. The
referral card may be directed to the community to which the individual desires to place
an application. This referral card will enable the Management Agent in the community
to send an application directly to the applicant. The applicant will return the completed
application directly to the site by mail or in person. Once the applicant is being
considered for placement in the community, the application will receive final processing
in the community and the applicant may be required to visit the community to complete
the application processing and eligibility determination. AHA may also act as an
application distribution point, rather than use a referral card, to assist interested persons
to apply for housing in the Mixed-Income, Mixed-Finance Community.

14-6. SELECTION PREFERENCES - LOCAL AND NONLOCAL.
The Management Agent will provide information on the preferences to be used in the
selection of families at the site. This information will be contained in the management
plan for the site. AHA will review and approve these preferences in advance.
Generally, AHA expects that the preferences will coincide with the local preferences adopted by AHA in its current Admissions and Continued Occupancy Policy ("ACOP"). Management Agents will be required to use the preferences specified in the ACOP unless AHA has provided other specific approval. If the preferences vary significantly from the policies provided in the ACOP previously approved by HUD, then AHA would review these preferences with HUD before that use.

14-7. ORDER OF APPLICANTS.
The method of opening the waiting list may determine the organization of applicants on the waiting list. Waiting lists sorted by lottery will be placed in a numerical order with the appropriate organization within the preferences. Waiting lists placed by date and time order will be organized in this manner with the appropriate organization for preferences. In either event, returning residents pursuant to a particular Further Assurances Agreement or Revitalization Plan will be placed on the applicable site-based waiting list prior to the placement of non-returning residents or other applicants on that applicable site-based waiting list.

AHA will provide applicants on the waiting list as of September 10, 1996, with the opportunity to maintain their date and time order in the development of site-based waiting lists. AHA will facilitate this process by providing information on AHA applicants as of September 10, 1996, to each Management Agent opening a site-based waiting list. The information provided by AHA will include the applicant’s name and the date and time of application.

The Management Agent will use this information to place applicants on the site-based waiting list in the date and time order specified according to the applicants’ verified preference status, if any. Applicants will be required to advise the Management Agent of any previous application with AHA in order to enable the Management Agent to use this previous date and time. Applicants will be advised that although an applicant has maintained the date and time order of the application originally placed with AHA, applicants will be selected according to the specific selection preferences of the site, as approved by AHA. This process will be terminated as soon as the effective date of applications on the waiting list exceeds the September 10, 1996 date. In this manner, AHA will provide each of the long-standing preexisting applicants to AHA an equitable opportunity to secure a public housing-assisted unit.

As a one-time action, AHA will advise each applicant on the waiting list as of September 10, 1996 of the following information:
A. There will be site-based waiting lists in the future upon which current applicants to AHA public housing can place an application.
B. Applicants will be able to use their current date and time position on the AHA waiting list for the application at the site-based waiting list.
C. Applicants must advise the Management Agent at the site-based waiting list location that they applied for housing with the AHA on or before to September 10, 1996. This will enable the Management Agent to secure the correct
information from AHA on their previous application date and time.

D. Upon applicant’s request, AHA will specify to these applicants their date and time of application for their files.

14-8. SCREENING CRITERIA.
The screening criteria for the Mixed-Income, Mixed-Finance Communities may exceed the criteria of the Admissions and Continued Occupancy Policy of AHA. The criteria will be designed objectively to screen applicants for housing to ensure the placement of persons prepared to meet the conditions of the lease and family self-sufficiency obligations as required. Site-based policies and management plans will address the method of requesting an informal review of the screening decision.

14-9. UNIT OFFERS AND REJECTIONS.
AHA intends that the Mixed-Income, Mixed-Finance Communities will operate with a large degree of independence to foster the specific goals of a Mixed-Income, Mixed-Finance community. Unit offers will be made in accordance with the method specified in the management plan and related site-based policies. Generally, the Management Agent will afford an applicant that has successfully completed the screening process an opportunity to lease the next available unit(s). Unit offers will be accomplished in the order of placement on the site-based waiting list to the extent administratively feasible. If an applicant rejects the unit(s) offered, the applicant will lose his or her place on the waiting list in accordance with the site-based policies. Said rejection will not automatically affect the position of the applicant on any other waiting list for AHA housing whether site-based or centralized.

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AHA’s application form for the public housing program will include an advisory notice to the applicant that additional sites exist or will exist in the future. The notice will also indicate that applicants must apply directly to the site in order to maintain a position on the site-based waiting list.

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14-12. **PURGING OF WAITING LISTS**

Each management plan will indicate when the Management Company will purge the site-based waiting list to update information on applicants for the public housing program. Generally, a letter is mailed to the applicant with a requirement to be returned to the Management Company within a specific time. The returned letter includes basic information updates and an affirmative statement that advises of the continued interest of the applicant in the public housing program or a public housing-assisted unit. Applicants who do not respond to the letter are removed from the site-based waiting list. In the future, the management company will include information in the letter to the applicants on the existing site-based waiting list to advise them of the ability to apply for public housing in the various sites with site-based waiting lists or with AHA via its centralized waiting list. The letter will also advise the applicant that other site-based waiting lists may open by public notice in the newspaper. Applicants will also be advised that the Central Applications Office maintains information on site-based waiting lists.

14-13. **TRANSFERS**

All transfers will be resolved within each individual Mixed-Income, Mixed-Finance Community. Residents may request transfers following the conditions specified in the site-based transfer plans. Management Agents will address these requests in accordance with the policies specified. AHA will not transfer existing residents to these communities, except as returning residents under relocation efforts of AHA.

14-14. **REVIEW OF SITE OPERATIONS**

AHA will provide for oversight of the site-based waiting list through several different methods. Management Agents will provide monthly reports to AHA on the leasing efforts. These reports provide information on occupancy, leasing, work orders, unit turnaround, and financial status. AHA will review these documents, reports and statements regularly.

The management plans, regulatory and operating agreements and the marketing plans specify document retention as required by the HUD regulations. These records include the related application documents, waiting lists, publications, and letters to applicants. AHA will ensure the review of these documents to determine the accurate utilization of the waiting list by the Management Agent. This review may be accomplished by an independent auditor, AHA staff, or management reviews conducted by private agents contracted to perform these reviews. If AHA determines problems with the operation of the site-based waiting list, AHA will undertake the appropriate measures to resolve said problems.

14-15. **EFFECTIVE DATE**

This Addendum hereby amends the Site-Based Waiting List Policy, adopted by the Board of Commissioners of AHA on December 19, 1996, and in use since that date, shall be effective as of June 25, 1999, subject to concurrence by HUD.

[END]
**F-1 Candidate Communities or Properties for Demolition (Complete or Partial), Disposition, or Conversion from Section 9 to Section 8**

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<tr>
<th>Development Number</th>
<th>Development Name</th>
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<td>Antoine Graves</td>
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<td>GA006026</td>
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<td>Barge Road</td>
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<td>Leila Valley</td>
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<td>GA006056</td>
<td>Martin Street Plaza</td>
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<tr>
<td>GA006016</td>
<td>McDaniel-Glenn (Main Campus and Annex)</td>
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<td>GA006017</td>
<td>Thomasville Heights</td>
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<tr>
<td>GA006010</td>
<td>University Homes</td>
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<tr>
<td>GA006024</td>
<td>U-Rescue Villa</td>
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<td>GA006044</td>
<td>Westminster</td>
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*Any reference to a community includes associated non-residential structures, including community centers.*
## Candidate Communities for Conversion from Section 9 to Section 8

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<tr>
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<td>GA006083</td>
<td>Ashley Courts at Cascade I, II, III</td>
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<td>GA006084</td>
<td>Ashley Terrace at West End</td>
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<td>GA006077C</td>
<td>Centennial Place IV</td>
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<td>GA06P006093</td>
<td>College Town at West End I</td>
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<td>GA06P0060892</td>
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<td>Columbia Village</td>
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<td>Magnolia Park I</td>
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<td>Magnolia Park II</td>
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<td>Summerdale Commons I</td>
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<tr>
<td>GA006079</td>
<td>Summerdale Commons II</td>
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<td>The Villages at Castleberry Hill I</td>
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<td>Villages at Carver I</td>
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<td>The Villages of East Lake II</td>
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## Predevelopment
- West Highlands at Heman E. Perry Boulevard III

## Additional Candidate Properties for Demolition (Complete or Partial) or Disposition

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<td>GA06P006016</td>
<td></td>
<td>or Facilities Maintenance Shop (568 Humphries Street)</td>
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<td>GA06P006060</td>
<td></td>
<td>or Facilities Maintenance Shop (749 McDaniel Street and adjacent parcels)</td>
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<td>GA06P006061</td>
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<td>Fulton Street/ McDaniel Glenn Vacant Property</td>
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<td>GA06P006033</td>
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<td>Gilbert Gardens Annex</td>
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<td>John Hope Model Building</td>
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<td>Kennedy Street Property (2.54 acres)</td>
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<td>Model Cities I, II</td>
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<td>North Avenue Warehouse (301 North Avenue)</td>
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<tr>
<td>GA06P006039</td>
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<td>Perry Homes Park Land Swap (6.91 acres)</td>
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CHAPTER 1: INTRODUCTION

AHA MISSION STATEMENT

To become an economically viable and self-sustaining provider of quality affordable housing and a catalyst for community revitalization and individual self-sufficiency.

Agency Profile

AHA is the fifth largest PHA in the United States, and is Georgia's largest landlord. AHA provides housing assistance to more than 10,400 families in the public housing program under both internal management and private management contracts. AHA also provides affordable housing opportunities to more than 10,900 families through tenant-based Housing Choice Program.

AHA was created by the City of Atlanta on June 11, 1938, under provisions of the Housing Authorities Law of Georgia (O.C.G.A. § 83-1) effective February 6, 1933. Established as a public body corporate and politic, it is not a federal agency, nor is it directly controlled by the State or the City. However, the AHA must comply with federal program regulations, and federal, state, and local statutes in administering its various housing programs.

AHA’s jurisdiction for Housing Choice Program assistance includes properties within the City of Atlanta, Georgia and an area within ten miles of the city's boundaries. (AHA’s execution of housing assistance contracts outside of the city limits are subject to the consent of the housing authority that is operating a Certificate and Housing Voucher Program within that jurisdiction.)

AHA is governed by a seven-member Board of Commissioners, appointed by the Mayor. Five members are appointed to five-year terms, and two resident commissioners serve one-year terms. All Commissioners serve without pay. The Board of Commissioners' regular meetings are held on the last Wednesday of each month, or at such other time as Public Notices are provided for such meetings.
Purpose of the Housing Choice Programs

The Section 8 Programs were originally funded by Congress under the Housing Act of 1937 as amended and implemented by the Department of Housing and Urban Development to achieve five major objectives:

1. Provide improved living conditions for very low income families while maintaining their rent payments at an affordable level;
2. Promote freedom of housing choice, and deconcentration of very low income and minority families,
3. Provide decent, safe and sanitary housing for eligible participants,
4. Provide an incentive to private property owners to rent to very low income families by offering timely HAP Contract payments; and
5. Provide guidance in the administration of the Section 8 HCVP Programs for compliance with HUD requirements, including maintaining well-organized and complete records, and facilitating HUD’s monitoring and review of the Section 8 HCVP Programs

AHA’s Housing Choice Program Objectives

There is an undeniable need for very low-income housing assistance within AHA’s jurisdictions as evidenced by the extensive waiting lists for both the Housing Choice and public housing programs. Furthermore, there is a shortage of decent, safe, sanitary and affordable housing units within AHA’s jurisdiction. AHA’s strategy is to maximize program utilization and goals in the simplest, and most economical manner possible while complying with HUD’s requirements and regulations for the Housing Choice Programs.

Recognizing that rental assistance and homeownership programs are the future of public housing, as we know it today, the AHA Housing Choice Program Division has a dual mission:

1. To provide the best service possible to its customers by implementing a three-fold approach to customer satisfaction:
   a. Formulating and implementing a streamlined approach for efficient and effective assisted housing program operation,
b. Expanding housing and other economic opportunities for participants by fostering positive relationships with owners and managers of rental properties throughout the City of Atlanta and in the human services and business community, and

c. Providing real opportunities for economic independence through self-sufficiency and affordable housing and homeownership programs.

2. To position AHA strategically as we begin the twenty-first century the Housing Choice Program continues to:

a. Assist AHA with relocation and alternative housing and replacement housing during the process of public housing revitalization,

b. Adapt the approaches of the Housing Choice Program Division to meet new and changing goals of AHA as it moves toward becoming the national prototype, and

c. Seek technological advances that will professionalize HC operations and provide great access for families to HC program information and opportunities.

Department Structure and Functions

A three-person executive management team comprised of a Deputy Executive Director for the Housing Choice Programs and an Assistant Director for Housing Operations and an Assistant Director for Administration provide the executive program management and leadership of the approximately 85 person Housing Choice Program Division.

The Assistant Director for Housing Operations oversees the day to day activities of the Senior Housing Advisors, Intake Advisors, and Housing Advisors, as well as the reception and administrative support staff affiliated with managing the waiting list, performing eligibility determinations for initial certifications, and conducting annual and interim reexaminations.

The Assistant Director for Administration oversees the day to day activities of the budget and compliance staff, portability, mobility, Family Self-Sufficiency, portability, marketing, inspections, and leasing staff.

Both assistant directors have managers and line supervisors who are responsible for the attainment of production and compliance goals.
The division of program management responsibilities enables the Deputy Executive Director to participate in issues affecting the overall goals and operations of the agency, as well as foster important relationships in the business, governmental real estate and human service professionals in the Atlanta community and national housing community.

Organizational Chart

The organizational chart on the following page illustrates the various functions and staff assignments for the Housing Choice Program Division.

Purpose of the Administrative Plan

The purpose of the Administrative Plan is to establish and identify AHA’s policies for managing the Section 8 program for functions not defined by statute, federal regulations or HUD notices. Any policy related to families and not addressed in this Administrative Plan are governed by HUD Handbooks, Federal regulations, HUD Memoranda, HUD Notices and guidelines, or other applicable laws, in each case, as amended from time to time.

Application Regulations and Program Documents

The applicable rules and regulations governing the administration of the Section 8 HCP are set forth in 24 C.F.R. Parts 1, 5, 100, 888, 982, 983, and 985.

Management of program operations and AHA staff must also meet the requirements set forth in

(i) AHA’s Personnel Policy;
(ii) Equal Housing Opportunity Plan ("EHOP");
(iii) HUD program regulations and notices
(iv) Federal, State and local Fair Housing statutes
(v) AHA’s Standard Operating Procedure Manuals.

Admissions and continued participation in the Section 8 Housing Choice Programs are covered by this Administrative Plan, and unless otherwise noted, the policies are the same for both the Section 8 Certificate and Housing Choice Voucher Programs.
Administrative Plan Amendments

The provisions of the Administrative Plan may be amended due to new or revised statutes, HUD regulations, or changes in internal policies. Changes to the Administrative Plan are submitted to the Board of Commissioners for approval.

HUD Regulations Prevail

In the event a provision of the Administrative Plan or a change to the Administrative Plan conflicts with statutes or HUD regulations, statutes and HUD regulations have precedence.

Terminology

Throughout the Housing Choice Programs Administrative Plan ("Administrative Plan"), the Housing Authority of the City of Atlanta, Georgia is referred to as “AHA” or “HACA”; Public Housing Agency as “PHA”; Housing Assistance Payments as HAP; Section 8 Existing Housing Assistance Payment Programs and the Housing Choice Program (“HCP”) as the “Section 8 Programs”; and the U.S. Department of Housing and Urban Development as “HUD”. “Owner” and “landlord” are used interchangeably throughout this Administrative Plan.

In addition, a glossary of key program terms is included in the Administrative Plan to assist persons unfamiliar with the vocabulary of the Housing Choice Program.
 CHAPTER 2: IDENTIFICATION OF KEY PROGRAM REGULATIONS AND POLICIES

HUD Regulations

The applicable rules and regulations governing the administration of the Section 8 Housing Choice Program are set forth in 24 CFR Parts 1, 5, 8, 35, 92, 100, 888, 908, 982, 983, and 985.

Part 1 implements Title VI of the Civil Rights Act of 1964 by prohibiting discrimination in federally assisted housing programs.

Part 5 provides guidance on HUD’s general program requirements including waivers, disclosure and verification of social security numbers, obtaining family information, program definitions, restrictions on assistance to non-citizens, occupancy requirements, family income, family payments, physical condition standards, and uniform financial reporting standards.

Part 8 outlines requirements for non-discrimination based on handicap.

Part 35 provides guidance on the prevention of lead-based poisoning in certain residential structures and identifies notice requirements and standards for evaluating lead paint hazards and hazard reduction activities.

Part 92 identifies the eligibility of rental housing in the home investment partnership program.

Part 100 outlines prohibitions against discrimination because of handicap under the Fair Housing Act and describes the rules for reasonable modification of existing premises and reasonable accommodation.

Section 888 addresses fair market rent issues and annual adjustment factors in the for the Section 8 Housing Assistance Payments Programs.

Section 908 outlines electronic transmission reporting requirements.

Section 982 establishes the program rules for the Housing Choice Voucher program. This section includes provisions for general requirements, the PHA Plan, program funding, the ACC, program administration, admission requirements, leasing a unit, where a family can live and move, HQS, subsidy standards, inspection, maintenance, the HAP Contract, owner responsibility, rent
and housing assistance payments, family obligations, and denial and termination of assistance, and identification and treatment of special housing types.

Section 985 provides the program rules for the Section 8 Management Assessment Program that is further described below.

**SEMAP Requirements**

The Section 8 Management Assessment Program establishes the criteria by which HUD measures AHA’s Housing Choice Program.

The Housing Choice Program tenant-based rental assistance program is measured for HUD compliance under the following 15 performance indicators:

1. Selection from the **Waiting List** in accordance with AHA Administrative Plan
2. Method for determining **Rent Reasonableness**
3. Determination of **Adjusted Income**
4. Maintaining an up to date **Utility Allowance** Schedule
5. Conducting **Quality Control** HQS Inspections
6. Withholding HAP for **HQS Enforcement**
7. The extent of which the HA works towards **Expanding Housing Opportunities**
8. Establishing HUD compliant **FMR/Payment Standards**
9. Timely **Annual Reexaminations**
10. Correct **Tenant Rent Calculations**
11. Ensuring **Pre-Contract HQS Inspections**
12. Performing **Annual HQS Inspections**
13. Maximiizing **Lease-Up**
14. **Family Self-Sufficiency Enrollment, Escrow Accounts**
15. **Deconcentration**

**Policies**

In addition to Federal regulations and the Housing Choice Program Administrative Plan, the management of program operations and AHA staff must also meet the requirements set forth in:

(i) AHA’s Personnel Policy;
(ii) Equal Housing Opportunity Plan ("EHOP");
(iii) HUD notices
(iv) Federal, State and local Fair Housing statutes
(v) AHA’s Standard Operating Procedure Manuals.
Admissions and continued participation in the Section 8 Housing Choice Programs are covered by this Administrative Plan, and unless otherwise noted, the policies are the same for both the Section 8 Certificate and Housing Choice Voucher Programs.

**AHA’s EEO Policies**

AHA is an equal opportunity employer and as such has developed recruitment, selection, and hiring policies to comply with EEO requirements.

AHA’s employee work practices and codes of conduct are defined in the Employment Handbook provided to staff on the first day of employment and

Performance-based job-descriptions delineate employee responsibilities for producing quality work in accordance with HUD regulations, federal, state and local laws, administrative policies and standard operating procedures.

**Equal Opportunity Housing**

It is the policy of AHA to fully comply with all applicable Federal, State, and local nondiscrimination laws, and with the rules and regulations governing Fair Housing and Equal Opportunity in housing and employment.

Specifically, AHA shall not on account of race, color, sex, religion, handicap, familial status, or national origin, deny any family or individual the opportunity to apply for or receive housing assistance under HUD’s Section 8 HCVP Programs. To ensure equal awareness to affordable housing opportunities, AHA markets the program in both the Atlanta Constitution Journal and minority newspapers, and on television through public service announcements. AHA also participates in a number of community fairs and special events that further broaden the public’s awareness of the Housing Choice Program.

AHA will provide Federal, State and Local information to Certificate and Housing Choice Voucher holders regarding discrimination and available remedies.

Such information will be made available during the family briefing session, and all applicable Fair Housing Information and Discrimination Complaint Forms will be made a part of the family’s briefing packet.

In support of HUD’s goal to expand housing opportunities for Housing Choice families, AHA maintains an extensive available units list as well as a listing of handicap accessible units within AHA’s jurisdiction. AHA also seeks and
maintains a listing of units for communities in the metropolitan area and outside of AHA’s jurisdiction that do not administer a Section 8 HCVP Program.

The lists are available at the front desk for families who come in, or may be mailed upon request to disabled or handicapped participants. The list is also provided to all Housing Choice Voucher recipients at the participant briefings.

**Equal Access to AHA Programs and Services**

Posters and program information that are easily readable from a wheelchair are placed in strategic locations throughout AHA. In addition, AHA has established relationships with several community agencies to disseminate housing program information.

AHA facilities are handicap accessible and/or usable by persons with handicaps or disabilities. AHA provides accessibility for the hearing impaired through the TDD/TDY telephone service. Arrangements may also be made for an interpreter or advocate for persons desiring such assistance.

**Reasonable Accommodation**

It is the policy of the Atlanta Housing Authority to provide accommodation to families upon written request to ensure full participation in the Housing Choice Program. AHA will leave it up to the family to identify the need for an accommodation and to discern what type of accommodation is necessary to ensure their full participation and access in the Housing Choice Voucher Program.

Examples of the types of circumstances where a family might want to request an accommodation are:

- Visual impairments
- Hearing impairments
- Physical Disability
- Mental Disability
- Medical conditions
- Limited comprehension
- Language barriers
In all cases where a client must read or sign a document, the instruction can be appropriately changed. If a client cannot read, or read English, the document may be read and explained to him/her in plain language. If a client is not sighted, the document may be read. If a client cannot sign his/her name, a mark may be witnessed when the witness is confident the client understands the document.

A client may provide his/her own interpreter for any conference. The agency will not bear the cost of providing an interpreter, but will seek out assistance when needed through other agencies such as the local School Board or Community College.

In order to provide equal service to all, primary consideration will be given to the requests of an individual with handicap for the auxiliary aids needed. AHA may provide an alternative accommodation if it is equally effective in creating two-way communication or other accessibility to the program.

If an applicant with a disability fails to respond to a selection letter for reasons relating to their disability, the applicant may be reinstated and put back on the waiting list with their original date of application. This contact and request must be made within thirty (30) days of the selection.

An applicant with disabilities will be offered a second interview when they are determined ineligible or denied assistance to determine whether a reasonable accommodation would enable him/her to overcome the determination.

If the second interview is requested, the agency will determine if the applicant meets the definition of a person with a disability as specified in this Administrative Plan.

Any medical verification regarding a disability will be obtained in general terms and be maintained with regard to confidentiality.

If any family member meets the definition of person with a disability, they may request a reasonable accommodation, which will eliminate the barrier to equal participation.

**Administrative Fee Reserve Threshold**

The Deputy Executive Director for the Housing Choice Programs Division (DED) will monitor and approve any charges being made to the Section 8 administrative fee reserves for the housing choice voucher programs (operating reserve).

Approved charges to the administrative fee reserve will be set up for disbursement through the AHA budget amendment process. The DED must approve all charges against the administrative fee reserve or any related general
ledger account utilizing Section 8 HCP funds beyond those funds previously approved and allocated during the budget process, such as indirect administrative expenses for salaries and related benefits.

There are four levels of authorization for expenditures from the administrative fee reserve for Section 8 HCVP-related and/or other eligible housing purposes. The Section 8 HCVP budget manager may authorize eligible expenditures from the operating reserve for any amount up to $5,000. Amounts exceeding $5,000 and up to $25,000 will require the additional authorization of the DED.

Eligible expenditures for any amount over $25,000 and up to $100,000 will require authorization from the Executive Director. The AHA Board of Commissioners must approve any eligible expenditure from the administrative fee reserve of $100,000 or more.
CHAPTER 3: Program Marketing and Outreach

Marketing to Families

Funding Available

When the Housing Choice Program Waiting List becomes insufficient to ensure maximum program utilization, AHA announces the availability of HAP subsidies under the Section 8 Housing Choice Programs via local newspapers of general circulation including at least one (1) minority-oriented newspaper.

To reach prospective applicants that are unable to read the newspapers, AHA also distributes fact sheets to the broadcast media. Public service announcements are released to several radio and television stations. In addition, AHA’s marketing staff has established strong relationships with media staff, community service personnel as well as the radio stations for public service announcements. Poster announcements are also placed in the public housing communities. In addition, AHA reception and intake workers inform families making general inquiries about the Housing Choice Program to watch for public notices announcing the opening of the waiting list.

General Program Information

To ensure the availability of general program information when the waiting list is not open; AHA provides informational brochures that describe basic eligibility criteria and program processes. These materials are available in the AHA Housing Choice office, may be mailed upon request or can be obtained in various community service agencies throughout the city of Atlanta. In addition, to providing print materials, AHA staff participate in a number of community-related activities, media and public speaking events to enhance program outreach efforts.

Marketing to Owners

AHA continually recruits new owners to the Housing Choice Program by offering a vacant units listing service and courtesy inspections. AHA maintains and updates the listing on a monthly basis to ensure a current supply of vacant unit information to families. In addition, AHA advertises and conducts two owner workshops a month to attract new owners to the HCP and promotes successful participation in the Housing Choice Program. AHA seeks greater participation by owners whose units are in low poverty area through membership.
in the Atlanta chapter of the Georgia Real Estate Association and the Atlanta Apartment Association.

AHA’s Landlord Symposium, an annual event that focuses on educational issues important to owners as real estate investors, serves as a major source for attracting new owners and units to the Housing Choice Program.

Developing Community Support

The Atlanta Housing Authority makes a concerted effort to foster relationships throughout the human services, government, and business community in order to ensure the availability of decent, safe, and affordable units and self-sufficiency opportunities for Housing Choice Program participants.

The AHA marketing staff continually seeks venues for building community awareness and support including newsletters, promotional items, participation in community fairs, speaking engagements, and community fundraisers.
CHAPTER 4: Opening and Closing the Waiting List

Meeting Public Notice Requirements

As stated in the previous chapter, AHA’s program marketing and outreach efforts include the public announcement of the availability of Housing Choice Program subsidies. To comply with equal opportunity housing requirements and HUD regulations, AHA’s public notices on the opening or closing of the waiting list include the following information:

1. The dates of application period
2. The location(s) for filing an application
3. AHA telephone number
4. Methods for accepting an application
5. The ranking and selection method to be used
6. The lottery system, if used
7. Number of applications to be ranked, if limited
8. Eligibility requirements
9. Local preferences
10. Brief program descriptions
11. Limitations on who may apply, if applicable.

To ensure broad outreach to eligible families throughout the greater Atlanta community, AHA issues written public notices in the Atlanta Constitution Journal, the Village Voice and La Vision. The notices comply with the requirements stated in the EOHP, HUD regulations, and fair housing requirements.

In addition, the notice includes a brief description of the Section 8 HCVP Program, and indicates AHA’s policy to have occupants/applicants of Public Housing file a separate application to the Section 8 HCVP Program in order to be considered for the Section 8 HCVP Program.

The public notice also describes AHA’s administrative policy that applicants for the Section 8 HCVP Programs do not lose their place on the Public Housing waiting list if they are selected for the Housing Choice Programs prior to selection from the Public Housing Waiting List. Likewise, if selected from the public housing waiting list, prior to selection from the Housing Choice Waiting List applicants will retain their position on the Housing Choice Waiting List.
Special Admissions

From time to time HUD awards funding to serve persons or families with specific housing needs. Examples of these types of special programs include:

1. Welfare to Work,
2. Mainstreaming Persons with Disabilities
3. Family Unification
4. Veterans Affairs Supported Housing (VASH)

If AHA is awarded funding for a set-aside program, AHA may open the waiting list to accept applications from those persons with specific eligibility criteria tied to that funding.

In addition, AHA may determine that it is necessary to open the waiting list to address an urgent local need and will accept applications from those persons impacted by the urgent situation.

If the waiting list is opened to build an applicant pool for funding set-asides or to address an urgent local need, AHA will announce the limited opening of the list in accordance with HUD’s public notice requirements outlined on the previous page.

Public Housing Relocation and Reprisals

The Housing Choice Program may accept applications at any time from families displaced by AHA’s demolition, reorganization, or disposition of public housing who have received a 90 day relocation notice from the AHA. AHA includes information on AHA’s policy on reprisals in its informational brochures and will issue public notice, as AHA’s public housing demolition and relocation activities require.

Closing the Waiting List

It is AHA’s policy to announce the closing date at the same time that AHA announces the opening of the waiting list. AHA ensures that the open enrollment period is long enough (minimum of 5 business days) to recruit an adequate pool of applicants to fill the slots for anticipated funding as well as meet the projected turnover of program participants for an 18-24 month period.
CHAPTER 5: Application to the Waiting List

Preliminary Applications

AHA uses a preliminary application process to identify persons interested in receiving housing assistance and to record preferences for determining selection from the Housing Choice Program Waiting List.

The basic pre-application form requires the name of head of household, social security number, address, telephone number, birth date, age, number of adults and number of minors in the household, annual gross income, and a personal declaration for any local preferences claimed. Applicants must complete the preliminary application and mail to the office within the deadline specified in the public announcement.

To provide reasonable accommodation to persons with disabilities, the information may be completed by AHA staff or other community service providers and advocates. Individuals who have a physical impairment that would prevent them from making application in person are directed in the public notice to call AHA to make arrangements to complete the pre-application.

Pre- Application Locations

The public notice identifies the location of distribution sites for applications to the Housing Choice waiting list. The following list includes sites used by AHA to ensure accessibility to a broad geographic area and a diverse group of community service providers. In addition to the community locations identified below, pre-applications are also provided at the AHA public housing sites.

Latin American Association
Achor Center, Incorporated
Task Force for the Homeless
Fulton/Atlanta Community Action Authority
John Birdine Neighborhood Community Center
DFACS Offices - 4 locations
Atlanta Day Shelter
The Atlanta Urban League, Inc.
Georgia Hill Community Center
Office of Disability Affairs
The Living Room
Aid Atlanta
Dunbar Community Center
Legal Aide Society
Goodwill Industries of N. Georgia, Inc.
Veterans Administration Hospital
Sullivan Center
Grady Memorial Hospital
Disability Link
Pre-Application Processing

Upon receipt of the pre-application, AHA staff date and time-stamp applications in order to verify that the pre-application was received during the designated waiting list application period.

Staff reviews the pre-applications for completeness and notifies families by telephone or in writing if there is missing information or signatures. Families are given a deadline to provide the missing information so that their application can be included in the lottery. If the family fails to respond to the request for additional information, the applicant is denied placement on the waiting list.

Information on the preliminary application is not verified until the family has been selected from the waiting list for final eligibility processing.

Duplicate records are removed prior to the lottery selection process.

The pre-application is retained as part of the applicant's permanent file.

Eligibility Criteria for Admission

In order to be eligible for admissions, an applicant must meet the definition of “family”, be income-eligible, and must be a citizen or a non-citizen who has eligible immigration status as determination in accordance with 24 CFR Part 5.

Definition of Family

For the purposes of eligibility, a “family” is defined as:

1. A group of persons who intend to share residency whose income and resources are available to meet the family’s needs, including but not limited to a family with a child or children;

2. Two or more elderly or disabled persons living together; or

3. Any single person including an elderly and/or disabled person.
Income Limits

To be income eligible for the Housing Choice Program the applicant must be either:

1. An extremely low income family - defined as a family whose annual income does not exceed thirty (30%) of the median income for the area, as determined by HUD, with adjustments for smaller and larger families; or

2. A very low-income family- defined as a family whose annual income does not exceed 50% of the median income for the areas, as determined by HUD. HUD may establish income limits higher or lower than fifty percent of the median income for the area on the basis of its findings that such variations are necessary because of unusually high or low family incomes; or

3. A low income family-defined as a family whose income does not exceed eighty percent (80%) of the median income for the area as determined by HUD with adjustments for smaller or larger families, except that HUD may establish income limits higher or lower than eighty percent (80%) on the basis of its findings that such variations are necessary because of unusually high or low incomes

AHA compares the family’s annual income to the annual income limit established by HUD when the family is determined income eligible.

A low-income family may be assisted in any of the following categories:

1. Continuously Assisted- An applicant is continuously assisted under the 1937 Housing Act if the family is already receiving assistance under the 1937 Housing Act Program when the family is admitted to the Housing Choice Voucher Programs. The 1937 Act programs include the Public Housing Programs as well as the old Section 23 leased housing and Section 23 housing assistance payments programs. The family will be considered to be continuously assisted in these programs if they have experienced an interruption in assistance of less than one hundred twenty (120) days between assisted occupancy of one unit for which they will be assisted and the certificate or voucher issuance date.

2. Displaced by Rental Rehabilitation- A low-income family physically displaced by rental rehabilitation activity under 24 CFR Part 511.
3. **Non-purchasing Family**- The family is a low-income non-purchasing family residing in a HOPE 1 or HOPE 2 project or in a project subject to a homeownership program under 24 CFR Section 248.173 or Section 5H Plans.

4. **Displaced by Prepayments or Voluntary Termination**- The family is a low-income family displaced as a result of the prepayment of a mortgage or voluntary termination of a mortgage insurance contract under 24 CFR Section 248.165.

5. **Public Housing Demolition/Disposition**- A low-income family displaced as a result of public housing demolition/disposition.

6. **Sale, Foreclosure or Demolition of Multi-Family Property**- If a low-income family in the Certificate program resided in a HUD-owned multifamily rental housing project when HUD sells, forecloses or demolishes the project.

**Local Preference Definitions**

To claim a local preference for waiting list placement the family must certify that their circumstances reflect at least one of the following situations:

1. **Involuntarily displaced**-
   - a. **By Government Action**- To qualify for this preference, AHA must have identified the family’s current residence for demolition, modernization, or disposition as evidence by receipt of a 90-day notice.
   - b. **To Avoid Reprisals**- The family must have provided information on criminal activities to law enforcement officials and based on a threat assessment the law enforcement agency recommended relocation of the family to avoid or minimize the risk of violence against the family for providing the information. Or a law enforcement agency notifies AHA that the family is part of the Witness Protection Program.

2. **A Working Family**
   
   To qualify for this preference, the head of household or spouse must work full time or have been given a bona fide offer of full time employment.
3. Training for Economic Independence

To qualify for this preference, the applicant must participate or be enrolled in an approved AHA training, education, or employment program, funded by the Job Training Partnership Act (JPTA), Private Industry Council, (PIC, JOBS/PEACH), Department of Family and Children Services (DFACS) or any other Federal, State, or local organization. This includes programs funded by business or non-profit organizations, provided that the program’s primary purpose is to prepare extremely low or very low-income individuals for economic independence. Such participation must be for a minimum of twenty (20) hours per week, and must be verified, in writing by the training, education, or employment provider.

Lottery Ranking

It is the policy of AHA to rank by lottery all pre-applications to the waiting list and not make any determinations on an applicant’s apparent eligibility until the family is selected from the waiting list and completes a full application.

Therefore, if the family does not meet an eligibility or screening criteria of the AHA, they will not be notified of their ineligibility for assistance until they complete a full application and the information on the application is verified.

Notification of Waiting List Placement

Based on the information on the pre-application, applicants will be informed in writing of their status on the Waiting List. AHA’s Notice of Waiting List Placement advises the family that the timing of an applicant’s selection from the waiting list is subject to several factors that are beyond AHA’s control (e.g., preference determination, program turnover, additional funding, etc.).

In addition, the family is advised of their responsibility for notifying AHA of any changes in family circumstances that may be needed to keep their application current. AHA also informs the family of their responsibility to respond to subsequent information requests or updates in regards to their application.
CHAPTER 6: Organization and Maintenance of the Waiting List

Lottery System

Immediately following the announced application period, all pre-applications received by mail within the allotted time are reviewed for signature, social security number, and a mailing address, and are entered into a computer database.

The computer randomly assigns a lottery number that provides each applicant with a ranking number.

Following the data entry of all pre-applicant records and lottery assignment, AHA mails applicants a written Notice of Waiting List Placement that states their randomly selected lottery ranking number and confirms the preference or non-preference status that was claimed on the pre-application.

The Notice also explains that all waiting list selections with the exception of set aside or special use funding will be made according to ranking number and preference status.

Applicant Data Collected

The AHA Housing Choice preapplication collects the following information for prospective Housing Choice families:

- Name of Head of Household
- Spouse’s name
- Social Security Number
- Address and Telephone Number
- Number of adults and minors in household
- Date of Birth/Age- Head of Household
- Elderly/Disabled Preference Status - Head of Household or Spouse
- Involuntarily Displaced Preference Status
- Employment/Training/Education Preference Status
- Gross Annual income
- Source of Income
- Race/Ethnicity
Prior to each waiting list selection, the MIS Department produces a current Waiting List Report that provides an accounting of all applicants according to lottery number, preference status, and selection status. From the information on the report, the next group of applicants to be selected is identified. All waiting list selections must be approved by the Deputy Executive Director of the Housing Choice Programs. It is the policy of the AHA to complete an eligibility determination on all selected applicants prior to making additional waiting list selections.

An exception to the selection policy will occur if the need arises to process applicants for set-aside or special use funding.

**Special Admissions**

Admission of an applicant without placing the applicant on AHA's waiting list or, without considering the applicant’s position on AHA waiting list is a Special Admission.

HUD may award program funding for families with special specific program requirements, such as Family Unification, Mainstream/Disabled, Welfare-to-Work, etc. where a special admission is allowed.

If HUD awards AHA program funding that is targeted for families with specific circumstances or needs:

1. AHA must use the targeted assistance for families who meet the specific funding criteria;
2. AHA may admit a family that is not on the AHA Waiting List, or without considering the family's Waiting List position.
3. AHA must maintain records showing that the family was admitted with HUD targeted assistance.

If HUD designates funding for families living in a specified unit, special admissions policies will also apply.

Examples of the types of programs where funding may be targeted for a family living in a specified unit include:

- Families displaced because of the demolition or disposition of a public or Indian housing project, including for relocation housing and replacement housing,
♦ Families residing in multi-family rental housing project when HUD sells, forecloses or demolishes the project;

♦ For housing covered by the Low Income Housing Preservation Act of 1990:

♦ Non-purchasing families residing in a project subject to a home ownership program under Title 24 C.F.R. Section 248.173 or Section 5H Plans;

♦ A family displaced because of mortgage repayment or voluntary termination of a mortgage insurance contract;

♦ Families residing in a project covered by a project based Section 8 HAP Contract at or near the end of the HAP contract term; and

♦ Non-purchasing families residing in a HOPE I or HOPE II project.

**Reporting and Recording Changes in Family Status**

Families are advised in the Notice of Waiting List Placement letter that changes in family preference status, household composition, or other circumstances need to be reported to the AHA in writing as it may affect the amount of time the family has to wait on the waiting list.

**Non-Preference to Preference**

If a family has a change in preference status from non-preference to preference while an applicant on the waiting list, the family may certify to the change in writing, and the family will be ranked according to their original lottery number as a preference holder. The family will be required to verify the preference when processed for final eligibility or will be placed back on the waiting list in a non-preference status.

**Preference to Non-Preference**

If a family no longer qualifies for a preference and the family notifies the AHA prior to being selected from the waiting list, AHA will document the change to the non-preference status in the family’s waiting list record.

If the family does not notify AHA that they no longer qualify for a preference, they will be placed back on the waiting list in a non-preference status at the time of the final eligibility determination.
Reporting and Recording Changes of Address

Families are also advised in the Notice of Waiting List Placement letter that they are responsible for maintaining a current mailing address with the AHA. Failure to provide updating mailing information may result in the applicant being removed from the Waiting List due to the inability to respond to AHA notifications.

Arranging for Post Office mail to be forwarded does not comply with the requirement to notify AHA of a change of mailing address. Failure to provide updating mailing information may result in the applicant being removed from the Waiting List due to the inability to respond to AHA notifications.

Updating and Purging the Waiting List

If an applicant has been on the waiting list for 24 months and it is unlikely that the family will be selected for final eligibility determinations within the next six months, AHA will contact the family to determine their continued interest in the Housing Choice Program. The family will have 15 business days (3 weeks) to respond to the update notice and if the family fails to respond or if the mail is returned undeliverable, the applicant will be removed from the waiting list.

Accommodation will be made for disabled applicants who may not have been able to respond to the notice in a timely manner due to their disabled status. If requested, AHA will reinstate the disabled applicant to the waiting list upon notification from the disabled person or advocate of the family's continued interest in the Housing Choice Program.
CHAPTER 7: SELECTION FROM THE WAITING LIST

Order of Selection

Selection from the AHA waiting list will be made without regard to race, color, sex, religion, creed, national or ethnic origin, age, family or marital status, ancestry, place of birth, sexual preference, handicap, disability, family size, or source or amount of income. Selections (other than for Special Admission Programs) will be made according to lottery ranking in the following order:

- Applicants who will be involuntarily displaced by government action of AHA. (public housing demolition, disposition, and redevelopment activities that require public housing families to relocate)

- Applicants who will be, or have been, involuntarily displaced to avoid reprisals.

- Applicants who are current AHA public housing residents and households currently on AHA’s public housing waiting list have expressed an interest in moving to units under a Project-Based Certificate program Housing Assistance Payment Contract.

- Applicants who are enrolled in training programs to achieve economic independence.

- Applicants who are working families.

The above provisions are subject to the limited exceptions provided elsewhere in the Administrative Plan which, in certain specific instances are provided by HUD regulations which allow AHA to make families “out of order” from the Section 8 HCVP tenant-based waiting list. Examples of these limited exceptions include selections to utilize Special Program funding, to assist public housing relocatees, and to meeting income targeting requirements.

Special Programs

In addition to public housing relocation activities, AHA administers three special programs that impact the order of selection from the waiting list. AHA selection policies for these programs are listed below.
Mainstream Program for Persons with Disability

Following the notification of the receipt of funds for the Mainstreaming Persons with Disability program, AHA will announce the limited opening of the waiting list to accept pre-applications from persons who meet the eligibility criteria for this program. To be placed on the waiting list for a Mainstream voucher, the applicant must certify that the household:

- Meets the AHA income limits
- Is eligible based on HUD and AHA suitability criteria
- The head of household or spouse has a verifiable disability as defined by the Social Security Administration

Family Unification

The Family Unification Program (FUP) was created to assist low-income families for whom the lack of adequate housing is a primary factor in the separation, or imminent separation of children from their families. At the time of new funding and on an ongoing basis, the AHA notifies the Fulton County Department of Family and Children Services, for purposes of identifying eligible families for the program.

If no FUP vouchers are available at the time the family is referred by DFACS, the family will be placed on the waiting list until a FUP voucher becomes available. The Family Unification Program waiting list is maintained separately from the regular Housing Choice Voucher waiting list which is organized according to preference and lottery number.

If a FUP-identified family previously submitted an application to the regular Housing Choice Voucher waiting list, they may be selected for either the FUP voucher or the freestanding voucher. Depending on lottery ranking, new funding, and attrition rates, the family may receive a regular voucher prior to receiving a voucher under the Family Unification Program.

Welfare to Work

The purpose of the Section 8 HCVP Welfare-to-Work Rental Voucher program is to provide Section 8 HCVP tenant-based assistance to help eligible families make the transition from welfare to work.
As new funding is received for the Welfare to Work program, the AHA will coordinate with the DFACS to identify current waiting list applicants that are eligible for the Welfare to Work program. If no families on the current waiting list are eligible for the Welfare to Work program, AHA will accept names from DFACS of new applicants to be placed on the waiting list for the Welfare to Work program.

To be identified on the Housing Choice waiting list for welfare-to-work rental voucher assistance, families must:

♦ be eligible to receive TANF, or
♦ be currently receiving TANF, or
♦ must have received within the preceding two years, assistance or services funded under the Temporary Assistance to Needy Families (TANF) program.

In addition, in order to receive a Welfare-to-Work Rental Voucher, families must be on AHA's waiting list for the tenant-based Section 8 HCVP program and selected from the waiting list and determined eligible.

The following policy will govern the waiting list selection procedures for the Welfare-to-Work Rental Voucher program.

1. The Fulton County Department of Family and Children Services (FCDFACS) will verify the TANF status of eligible families.

2. FCDFACS will refer eligible TANF families to AHA for participation in the Welfare-to-Work Rental Voucher program.

3. The TANF families will be identified as Welfare to Work candidates on the waiting list.

4. Families will be selected for the Section 8 HCVP tenant-based waiting list in the order that they were originally ranked on the waiting list.

5. Eligible TANF families may be selected for the Welfare-to-Work Rental voucher program before other families on the Section 8 HCVP tenant-based waiting list that are not eligible TANF families.

6. AHA will open the Section 8 HCVP tenant-based waiting list for eligible TANF families, if there is an insufficient number of eligible TANF families on the Section 8 HCVP tenant-based waiting list to participate in the Welfare-to-Work Rental Voucher program.
Public Housing Relocatees

When a public housing family receives a 90 day notice to vacate their public housing unit, and the family has expressed interest in receiving Section 8 Housing Choice Voucher Assistance, AHA will immediately begin to process their application for Housing Choice rental assistance.

It is the policy of AHA to track and monitor all public housing families who have been required to relocate due to demolition, disposition, or and are relocating with Housing Choice Voucher Assistance. To facilitate the tracking of these families, AHA places them on the waiting list and assigns a public housing ranking number. The family is then “selected” from the list and is reviewed for final eligibility. If the family were already on the Housing Choice Waiting List, the family would be selected from their current ranking position and processed for final eligibility.

Income Targeting Requirements

Section 513 of the Quality Housing and Work Responsibility act of 1998 established income targeting requirements for new admissions to the Section 8 tenant-based housing assistance programs.

Seventy five percent (75%) of all new admissions must be families whose income at the time of their admission does not exceed thirty percent of the area median income.

AHA maintains and produces statistical reports prior to making waiting list selections to determine that the income target requirements are met for new admissions. As such, AHA may select applicant without a working preference in order to fulfill the income targeting requirements.

Waiting List Selection Notices

AHA provides written notification to waiting list families and special program admissions when their name reaches the top of the waiting list or when funding becomes available.

The Notice provides families with a date and time to attend a final eligibility interview. The Notice indicates that if the appointment can not be made or if a reasonable accommodation is needed to contact the office immediately to make other arrangements.

If the family fails to keep the scheduled appointment without notifying AHA of the need to change the date, time, or location, AHA will send a Notice of Denial of
Assistance to the family the same day the family failed to attend the final eligibility interview. The family will have five days to respond to the Notice of Denial of Assistance prior to making the denial effective.
CHAPTER 8: FINAL ELIGIBILITY DETERMINATIONS

Final Eligibility Interview

Prior to the receipt of the Housing Choice voucher, all families must attend a final eligibility interview. At the interview, the family completes a full application, an authorization to release information form, provides required documents, and completes various third party verification release forms in order to verify sources of income, assets, expenses, and household composition.

Failure to Keep Appointment

If the family fails to keep the scheduled appointment without notifying AHA of the need to change the date, time, or location, AHA will send a Notice of Denial of Assistance to the family the same day the family failed to attend the final eligibility interview. The family will have five days to respond to the Notice of Denial of Assistance prior to making the denial effective.

Full Application

At the final eligibility stage, AHA collects detailed household and income information on all family members. The full application serves as a foundation for establishing the eligibility and amount of subsidy the family will receive. As such, the family is required to certify to the following information:

♦ Name, physical address, mailing address, telephone number, and emergency contact telephone number for the head of household

♦ Name, sex, date of birth, citizenship, full time student status, employment status, disability status, and social security number for all persons who will reside in the assisted household

♦ Anticipated changes in household composition.

♦ Marital status of head of household

♦ Status of prior assistance in public housing

♦ Status of prior eviction from public housing
♦ Status of prior criminal or drug-related activity

♦ Type and amount of all income/benefit sources for all persons living in the household

♦ Type and value of all assets for all persons living in the household

♦ Amount of unreimbursed medical expenses, prescriptions, medical insurance premiums, and attendant care or auxiliary apparatus for all persons in the household if the head of household or spouse is 62 years of age or disabled

♦ Amount of child care expense for children under the age of 13 that provides the opportunity to look for work, work, or attend school or a training program

♦ Local preferences claimed

**Authorization to Release Information**

AHA provides a copy of the HUD Form 9886, Authorization to Release Information/Federal Privacy Act Notice and explains its use to families in the verification of household income. The consent form must be signed by all adults in the household at the time of the income review.

Due to the fact that the consent form expires 15 months after the date signed, AHA provides families with a new consent form to sign at every interim, mover, or annual reexamination.

**Third Party Verification Forms**

AHA employs a third party verification system, with a color-coded form for each type of income, asset, and expense. The third party verification system is used at the time of determining final eligibility, interim reexaminations, mover reexaminations, and annual reexaminations. Families complete the top part of each form by providing the name and mailing address of the third party and signing the form as consent to release the information.

It is the policy of the AHA to require third party verification forms to be returned within 10 business days. If the form is not returned within the specified time, the family is notified to follow up with the third party within 10 business days. If the
third party form is not returned, AHA staff will attempt to verify the information with the third party by telephone and document the file.

Secondary Form of Verification

If third-party verification can not be obtained at all, AHA staff will document the file and accept a secondary form of verification from the family such as copies of paychecks, award letters, support agreements, federal and state tax returns, or other documents that provide the requested information.

Verification must not be more than 45 days old at the time it is presented. Current benefit statements and award letters from the Social Security Administration, Veterans Administration, and Department of Family and Child Services will be accepted as third party verification.

Documents to Verify Family Status

It is the policy of AHA to verify family composition and other factors certified by the family. The following types of verification will be acceptable as methods to document the applicant’s statements regarding family status:

♦ Birth Certificates for all members of a household
♦ Legal Certificate of Marriage
♦ Joint bank accounts, purchases or loans
♦ Prior or current lease or rental agreements showing cohabitation
♦ Credit report showing residence and joint financial activity
♦ Divorce decree signed by a judge or court
♦ Guardianship papers
♦ Verification from social services agencies
♦ Adoption papers
♦ Custody agreements
♦ School records
♦ Legal separation papers
♦ Social Security Identification Cards
♦ Naturalization papers
♦ Driver's License
♦ U.S. Military Discharge
♦ Official State Identification Cards
Documents to Verify Age and Citizenship

It is the policy of AHA to request and review birth certificates, baptismal certificates, marriage licenses, naturalization papers, immigration documents, driver’s licenses and other documents that provide identification, age, and place of birth information. With the exception of eligible immigration status documents, AHA will accept copies of documents. HUD regulations require that the AHA view the original documents of the eligible immigration status and make a copy for the file.

Mandatory Social Security Numbers

Families are required to provide Social Security Numbers for all family members age 6 and older prior to admission. All members of the family defined above must either submit Social Security Number documentation, or sign a certification that they have not been issued a Social Security Number. If the family member is under the age of 18 at the time of admission, his or her parent or guardian can execute the certification. Any family member who obtains a Social Security Number after admission shall submit the information at the next regularly scheduled income re-examination.

Documents to Be Viewed

Documents presented in lieu of third party verification will also be viewed and photocopied, with the exception of government checks. Government checks will be documented in the file as viewed by AHA staff to serve as verification for the requested information.

Use of Documents Received through Facsimile Machines

Verification documents received through facsimile machines will be acceptable proof of verification only if a third party verification form is signed and completed.

Family Certification/Self-Declaration

When verification cannot be obtained by written or oral third-party verification, or by a review of documents, applicants will be required to submit a notarized statement. Notarized statements are only to be used as a last resort, when the other forms of verification are impossible to obtain.
A non-notarized tenant statement as a form of verification is not acceptable. After a reasonable effort has been made by the family to obtain documents needed for verification, a notarized statement may be used.

Families may self-certify the Disposition of Assets without a notary seal. However, a family cannot self-certify disability status, and therefore must obtained third-party verification to receive a disability status in the Housing Choice Program.

**Department of Labor Income Matches**

It is the policy of AHA to perform a Department of Labor computer match to verify income information on all adult members of the household who have not reached the age of 70 and have not claimed and verified a disability status.

Unexplained discrepancies in the Department of Labor information and the information provided by the family will require an informal hearing/ review and may be grounds for denial or termination of assistance.

**Social Security Assessment SubSystem**

It is the policy of AHA to match the social security and supplemental security income information provided by the family with the information provided by the Social Security Assessment Subsystem (SASS). AHA recognizes that the SASS information is often provided more than 60 days beyond the day that the reexam has been completed. If the SASS documents do not match, AHA staff will review the dates of the change in the benefit and if necessary make an interim adjustment to the family’s share of their rent.

**Annualization of Anticipated Income**

In accordance with HUD regulations, AHA will annualize the verified anticipated income of the family. With approval from a supervisor, AHA staff may use last year’s income to anticipate the amount of income for the coming year when it cannot be clearly verified. If by averaging the prior 12 months’ income, a reasonable estimate of monthly income can be made, the estimate will be used to anticipate annual income over the next twelve- (12) months.

**Zero Income Status**

If a family reports zero income, AHA will have the family sign a verification form for the Department of Family and Children Services and the Social Security Administration (if AHA determines this is applicable) to verify that no income is
being provided. In addition, AHA will run a Department of Labor computer match on the family to determine if there is an unreported source of income in the household.

In addition, AHA may request a credit report on these families to determine if there are any monies being paid on behalf of the household on a regularly recurring basis that should be included as income for rent determination purposes. Families who are certified or recertify with zero income will be required to report to AHA every 90 days in regards to their income status.

**Minimum Rent**

AHA has established a minimum rent of $25 for the Section 8 Housing Choice Program. The minimum rent refers to a minimum family contribution and must include any applicable allowance for tenant paid utilities.

1. Hardship exceptions to the minimum rent requirement include the following situations:
   
a. The family has lost eligibility or is awaiting an eligibility determination for Federal, State, or local assistance.
   
b. The family would be evicted as a result of the imposition of the minimum rent requirement.
   
c. The income of the family has decreased because of changed circumstances, including:
      ♦ Loss of employment
      ♦ Death in the family

2. A minimum rent hardship exception does not apply if the hardship is determined temporary (i.e., lasting less than 90 days).

3. If a family requests a minimum rent hardship exception, the AHA will suspend payment of the minimum rent beginning the month following the family's hardship request.
   
a. "Suspension" means that the AHA must not charge the family a minimum rent or, if applicable, discontinue charging the family a minimum rent.
   
b. During the minimum rent suspension period, the family will not be required to pay a minimum rent and the
housing assistance payment will be increased accordingly.

c. If the AHA determines that there is no hardship covered by the statute, a minimum rent is imposed retroactively to the time of suspension.

d. If AHA determines that the hardship is temporary, a minimum rent may not be imposed for a period of 90 days from the date of the request. At the end of the 90-day suspension period, a minimum rent is imposed retroactively to the time of suspension. A reasonable repayment agreement must be offered for any minimum rent that is a back payment by the family.

e. If the AHA determines that the hardship is of long-term duration, the AHA must exempt (retroactively to the date of the family’s request for a minimum rent exception) the family from the payment of the minimum rent until the hardship no longer exists.

4. The denial of request for hardship exceptions is subject to AHA’s informal hearing procedures.

Other Criteria in Determining Eligibility

Other criteria that must be met in order for an applicant to be determined eligible for assistance under the Section 8 HCVP Programs include the following:

1. The family must have left any previous tenancy under the Section 8 HCVP Program during the past two years without being in violation of a family obligation under its Certificate of Family Participation or Housing Voucher. AHA can grant an exception if the family member who violated the family obligation is not a current member of the household on the application.

2. The family must not have committed fraud in connection with any Federal housing program.

3. The family must not have been evicted from Public Housing or by a Section 8 HCVP Program owner within the past thirty-six (36) months for lease violations.

4. The family must not have been terminated from the Section 8 HCVP Program within the past thirty-six (36) months for its
failure to comply with the requirements under the family’s Contract of Participation in the Family Self-Sufficiency Program, if applicable

5. The family must have paid any outstanding current debt owed the AHA or another PHA arising out of previous tenancy in Public Housing or the Section 8 HCVP Programs. No Repayment Agreement will be accepted for admission to the Section 8 HCVP Program. At the time of completing the full application, the family must pay in full any monies currently owed AHA, or another PHA, in order to be considered eligible for issuance of a Housing Choice Voucher.

6. Any member of the household must not engage in a drug-related criminal activity, or violent criminal activity (24 CFR 982.553).

7. AHA will immediately and permanently deny admission to any applicant convicted of manufacturing or producing methamphetamine (commonly referred to as speed) in violation of any Federal, state, or local law.

8. If AHA seeks to deny or terminate assistance because of illegal use, or possession for personal use, of a controlled substance, such use or possession must have occurred within one year before the date that AHA provides notice to the family of the determination to deny or terminate assistance. AHA will not deny or terminate assistance for such use or possession by a family member, if the family member can demonstrate that he or she:

   ♦ Has an addiction to a controlled substance, has a record of such an impairment, or is regarded as having such an impairment, and
   
   ♦ Is recovering, or has recovered from, such addiction and does not currently use or possess controlled substances.

   AHA will require a family member who has engaged in the illegal use of drugs to submit evidence of participation in, or successful completion of, a treatment program as a condition to being allowed to reside in the unit.

9. Persons evicted from public housing, Indian housing, Section 23, or any Section 8 HCVP program because of
drug related criminal activity are ineligible for admission to Section 8 HCVP programs for a three-year period beginning on the date of such eviction.

AHA may waive this requirement if:

- The person demonstrates successful completion of a rehabilitation program approved by AHA; or
- The circumstances leading to the eviction no longer exist. For example, the individual involved in drugs is no longer in the household because the person is incarcerated.

**Screening Out Illegal Drug Users and Alcohol Abusers**

AHA will prohibit the admission to Section 8 HCVP programs of any person who AHA determines is illegally using a controlled substance.

AHA will prohibit admitting to Section 8 HCVP programs in cases where AHA determines that there is reasonable cause to believe that the person abuses alcohol in a way that may interfere with the health, safer, or right to peaceful enjoyment of the premises by other residents.

AHA will prohibit admitting any person to Section 8 HCVP programs in cases where AHA determines that there is reasonable cause to believe that the person’s pattern of illegal use of a controlled substance or pattern of abuse of alcohol may interfere with the health, safety, or right to peaceful enjoyment of the premises by other residents.

AHA may waive the policies prohibiting admission in these circumstances if the person demonstrates to AHA’s satisfaction that the person is no longer engaging in illegal use of a controlled substance or abuse of alcohol and:

- Has successfully completed a supervised drug or alcohol rehabilitation program;
- Has otherwise been rehabilitated successfully; or
- Is participating in a supervised drug or alcohol rehabilitation program.
Suitability of Family

In determining eligibility for Housing Choice Program participation, AHA may not screen for factors that relate to the suitability of the applicant family as tenants.

It is the responsibility of the owner to screen Housing Choice Voucher holders as to suitability and acceptability. Such factors include (but are not limited to) prior rent-paying history, outstanding debts owed to previous owners, history of damage to rental properties, police record, employment, etc.

However, AHA does take into consideration, before issuing a Housing Choice Voucher, whether the applicant owes money to AHA or another PHA, or should be denied access to the Section 8 HCVP Programs because of a history of drug-related or violent criminal activity.

Pursuant to 24 CFR 982.307 (b), AHA will provide to the owner upon request, the family’s current address (as shown in AHA’s records) and the name and address (if known) of the landlord at the family’s current address and prior address.

In addition, upon written request of a prospective landlord, AHA will provide other information in its possession about the family, including information about the tenancy history of family members, or about drug trafficking by family members. In the family and owner briefings, AHA provides families and owners with a statement of its policy on providing information to owners.

Final Eligibility Determinations

Families determined eligible to receive assistance will receive a Notice to Attend a Briefing with an appointment day and time where the Housing Choice Program will be further explained and the family will receive their voucher. In the event a voucher is not available at the time of the final eligibility determination, the family will receive a notice of their eligible status and informed that they will be further notified when a voucher becomes available. In accordance with HUD regulations, AHA manages the waiting list selection process to ensure that vouchers are issued no later than sixty days from the date of selection from the waiting list.

Ineligibility Determinations

Families who are determined ineligible to receive assistance will receive a Notice of Ineligibility that states the reasons why they have been denied housing assistance and that an informal review may be requested to challenge the ineligibility determination.
Families must request the informal review within ten (10) days of the date of the Notice of Ineligibility and the informal review will be offered within ten (10) days of the request to review the ineligibility determination.

Changes that Occur Between Final Eligibility Determination and Execution of the HAP Contract

Applicants that are determined to be ineligible between the final eligibility determination date and the HAP Contract effective date will be notified of their ineligible status, and will be advised in writing of her/his right to an informal review within ten (10) days from the date of the notice.
CHAPTER 9: VERIFICATION POLICIES

Acceptable Forms of Verifications

The following verification information will be considered acceptable by AHA in the order it is presented:

Employment Income

For the verification to be complete, the employer must specify the amount and frequency of all regular and overtime pay, the effective date of the last pay increase, and the probability and effective date of any increase during the next 12 months.

a. Employment verification form mailed to and completed by the employer;

b. Check stubs or earning statements showing employee's gross pay per pay period and frequency of pay (may be used only when employment verification form is not returned);

c. W-2 forms if applicant has had the same job for at least two years and pay increases can be accurately projected (may be used only when employment verification form is not returned); or

d. Notarized statements, affidavits or income tax returns signed by the applicant describing self-employment and amount of income or income from tips and other gratuities.

Social Security, Supplementary Security Income (SSI), Disability Income, and Pensions

a. Benefit verification form completed by agency providing the benefits; or

b. Award or benefit notification letters prepared and signed by the authorizing agency. Since checks or bank deposit slips show only net amounts remaining after deducting SSI or Medicare, they may be used only when award letters cannot be obtained.

If a local Social Security Administration (SSA) office refuses to provide written verification, the Supervisory Staff of AHA should contact the SSA office supervisor. If the supervisor refuses to complete the written
forms in a timely manner, AHA may accept a check or automatic deposit slip as interim verification of Social Security or SSI benefits as long as any Medicare or State health insurance withholdings are included in annual income. AHA should immediately notify the local HUD Field Office of the SSA's refusal to provide verification information.

Unemployment Compensation

a. Verification form mailed to and completed by the unemployment compensation agency; or

b. Records from unemployment office stating payment dates and amounts.

Welfare

Welfare or Social Service agency's written statements or printouts as to the type and amount of assistance the family is now receiving, and any changes in assistance expected during the next 12 months.

Alimony or Child Support Payments

a. Current verification by the Clerk of Court’s Office, which states the amount and frequency of support, actually received;

b. Certified copy of a separation or settlement agreement or a divorce decree stating amount and type of support and payment schedules;

c. A notarized letter from the person paying the support;

d. Statement from Office of Child Support Recovery (OCSR) which is responsible for enforcing payment; or

e. Applicant's notarized statement or affidavit of amount received or that support payments are not being received and the likelihood of support payments being received in the future.
If payments are irregular:

a. Copy of separation or settlement agreement or a divorce decree stating amount and type of support and payment schedules;

b. Statement from agency or Office of Child Support Recovery (OCSR) responsible for enforcing payments to show that family has filed; or

c. Applicant’s notarized statement or affidavit of amount received.

Net Income from a Business

AHA must consult with families and use this data to estimate income for the next twelve-(12) months.

a. IRS Tax Return, Form 1040, including Schedule C (Small Business), Schedule E (Rental Property Income), Schedule F (Farm Income);

b. An accountant’s calculation of depreciation expense, computed using straight-line depreciation rules. (Required when accelerated depreciation was used on the tax return or financial statement);

c. Audited or unaudited financial statement(s) of the business;

d. Loan Application listing income derived from the business during the previous twelve-(12) months;

e. Documents such as manifests, appointment books, cash books, bank statements, and receipts will be used as a guide for the prior six (6) months (or lesser period if not in business for six (6) months) to project income for the next twelve (12) months. The family will be advised to maintain these documents in the future if they are not available; or

f. Applicant’s notarized statement or affidavit as to net income, including tips, realized from the business during previous years.
Child Care Business

If an applicant or participant is operating a licensed day-care business, income will be verified as with any other business. AHA will require the applicant or participant complete a form that shows the name of person whose child is being cared for; phone number; number of hours child is being cared for; method of payment (check/cash); and signature of person certifying to amounts paid for child care. If the family has filed a tax return, the family will be required to provide it.

However, if the applicant is operating a "cash and carry" operation (which may or may not be licensed) AHA will conduct interim reviews every sixty (60) days and have the participant provide a log with the following information: name, address and telephone number of the parent whose child is being cared for hours per week and rate paid for child care, and copy of cash receipt or check.

If the childcare is terminated, the parent must provide a signed statement indicating the termination date.

If childcare services were terminated, a third-party verification will be sent to the parent whose child was in childcare.

Recurring Gifts

a. Applicant's notarized statement or affidavit that provides the required information; or

b. Notarized statement or affidavit signed by the person providing the assistance. Must give the purpose, dates and value of gifts.

Scholarships, Grants, and Veterans Administration Benefits for Education

a. A benefactor's written confirmation of amount and purpose of assistance with a breakdown which includes the amount of the grant for the student's tuition, fees, books, equipment, supplies, materials, transportation, and miscellaneous personal expense; or

b. Statement from school showing amount of grant for costs of attendance figured into grant or scholarship, obtained by third-party verification. If necessary, the award letter may be used if attendance costs are broken down in the letter.
Family Assets

a. For non-liquid assets, collect enough information to determine the current cash value - the net amount the family would receive if the asset were converted to cash:

b. Verification forms, letters, or documents from a financial institution, broker, etc.;

c. Passbooks, checking account statements, certificates of deposit, bonds, or financial statements completed by a financial institution or broker;

d. Quotes from a stock broker or realty agent as to net amount family would receive if they liquidated securities or real estate;

e. Real estate tax statements if tax AHA uses approximate market value;

f. Copies of closing documents showing the selling price, the distribution of the sales proceeds and the net amount to the Section 8 HCVP applicant or participant;

f. Appraisals of personal property held as an investment; and/or

g. Applicant's notarized statements or signed affidavits describing assets or cash held at the applicant's home or in safe deposit boxes.

Savings Account Interest Income and Dividends

a. Account statements, passbooks, certificates of deposit, etc., if they show enough information, and are signed by the financial institution.

b. Broker's statements showing value of stocks or bonds and the earnings credited the applicant;

c. Broker's statements showing value of stocks or bonds and the earnings credited the family; and

d. If AHA accepts an IRS Form 1099 from the financial institution, AHA must adjust the information to project earnings expected for the next twelve- (12) months.
Assets Disposed of for Less than Fair Market Value (FMV) during Two Years Preceding Effective Date of Certification or Recertification

a. For all certifications and recertifications, AHA will obtain the family's certification as to whether any member has disposed of assets for less than fair market value during the two (2) years preceding effective date of the certification or recertification; and

b. If the family certifies that they did dispose of assets for less than fair market value, AHA must require a certification that shows (a) all assets disposed of for less than FMV; (b) the date they disposed of the assets; (c) the amount the family received; and (d) the assets' market value at the time of disposition. (See Chapter 8(M) for minimum threshold to effect income calculation.)

Interest Income from Sale of Real Property Pursuant to a Purchase Money Mortgage, Installment Sales Contract, or Similar Arrangement

a. A letter from an accountant, attorney, real estate broker, the buyer, or a financial institution stating interest due for next twelve (12) months. (A copy of the check paid by the buyer to the applicant is NOT sufficient since appropriate breakdown of interest and principal are not included.); and

b. Amortization schedule showing interest for the twelve- (12) months following the effective date of the certification or recertification.

Rental Income from Property Owned by Applicant

a. AHA must adjust these amounts for changes expected during the next twelve-(12) months:

b. IRS Form 1040 with Schedule E (Rental Income);

c. Copies of latest rent checks, leases, or utility bills;

d. Documentation of applicant's income and expenses in renting the property (tax statements, insurance premiums, receipts for reasonable maintenance and utilities, bank statements or amortization schedules showing monthly interest expense); and
e. Lessee’s written statement identifying monthly payments due the applicant and applicant's affidavit as to net income realized.

Full-Time Student Status

a. Written verification from the registrar's office or appropriate school official. AHA shall provide the verification form; or

b. School records indicating enrollment for sufficient number of credits to be considered a full-time student by the school.

Child Care Expenses

a. Written verification should be provided from the person who receives the payments. If the child care provider is an individual, they must provide their Social Security Number and a notarized statement of the amount they are charging the Section 8 HCVP applicant or participant for their services;

b. Verifications must specify the child care provider's name, address, and phone number, the names of the children cared for, and the frequency (number of times the baby sitting occurs), the rate of pay, and the typical yearly amount paid, including school and vacation periods; and

c. Applicant's certification as to whether any of those payments have been or will be paid or reimbursed by outside sources.

Medical Expenses

a. Applicant's certification as to whether any of those payments have been or will be reimbursed by outside sources;

b. Written verification from a doctor, hospital or clinic personnel, dentist, pharmacist, etc., of the estimated medical costs to be incurred by the applicant and of regular payments due on medical bills; and the extent to which those expenses will be reimbursed by insurance or a government agency;

c. The insurance company's or employer's written confirmation of health insurance premiums to be paid by the applicant;
d. Social Security Administration's written confirmation of Medicare premiums to be paid by the applicant over the next twelve (12) months;

e. For attendant care, a doctor's certification that the assistance of an attendant is medically necessary; the attendant's written confirmation of hours of care provided and amount and frequency of payments received from the family or agency (or copies of canceled checks the family used to make those payments); and the applicant's certification as to whether any of those payments have been or will be reimbursed by outside sources;

f. Receipts, canceled checks, or pay stubs that indicate health insurance premium costs, etc., that verify medical costs and insurance expenses also likely to be incurred in the next twelve (12) months;

g. Copies of Payment Agreements with medical facilities or canceled checks that verify payments made on outstanding medical bills that will continue over all or part of the next twelve (12) months; and

h. Receipts or other records of medical expenses incurred during the past twelve- (12) months that can be used to anticipate future medical expenses. The AHA may use this approach for "general medical expenses" such as non prescription drugs and regular visits to doctors or dentists, but not for one time, nonrecurring expenses from the previous year.

i. Medical insurance deductible amounts may be used as a medical expense the total medical expenses exceeds this deductible amount. AHA will use mileage (at the IRS rate or mileage at the rate approved by the Board of Commissioners for AHA) or cab receipts or bus fare itemization with to/from addresses listed for verification of the cost of transportation directly related to medical treatment.

Medical Need for Larger Unit

A reliable medical source must certify that such arrangements are medically necessary. AHA provides a third party verification form to confirm the medical professional's certification.
Disability Assistance Expense

Eligibility for disability assistance expense is verified from a medical source or agency that has certified the individual’s disability status.

Attendant Care

a. Attendant’s written certification as to: amount received from the applicant or participant or agency; frequency of receipt of amounts paid; hours of care provided; and/or copies of canceled checks applicant or participant used to make those payments; and

b. Certifications required in paragraph 3(b) below and/or copies of canceled checks applicant/tenant used to make those payments.

Auxiliary Apparatus

a. Receipts for purchases of, or evidence of monthly payments for, auxiliary apparatus; and

b. In the case where the person with a disability is employed, a statement from the employer that the auxiliary apparatus is necessary for employment.

Attendant Care/Auxiliary Apparatus

a. Written certification from a doctor or a rehabilitation agency that the person with a disability requires the services of an attendant or the use of auxiliary apparatus to permit the person with a disability to be employed or to function sufficiently independently to enable another family member to be employed, and

b. Family’s written certification as to whether they receive reimbursement for any of the medical expenses above and the amount of any reimbursement received.
Displacement by Government Action of AHA

Applicants who claim this preference must provide evidence of receipt of a copy of the 90-day notice under the Uniform Relocation Assistance and Real Property Acquisitions Policies Act of 1970.

Displacement to avoid reprisals

Applicants who claim they are being or have been displaced to avoid reprisals as a result of law enforcement agency threat assessment, must provide to AHA a written or oral verification from that law enforcement agency or from HUD, on behalf of a law enforcement agency, which recommends re-housing the family to avoid or minimize a risk of violence against family members as a reprisal for providing information on criminal activities to a law enforcement agency;

Working family

The applicant whose head of household or spouse is employed full time (35 hours or more a week) or has an offer of full time employment must provide to AHA, verification of full-time employment or bona fide offer of full-time employment in writing from the employer.

Training for Economic independence

The applicant must be participating in, or be enrolled for participation in, a training, education or employment program which is funded by the Job Training Partnership Act (JTPA), Private Industry Council (PIC), JOBS/PEACH Department of Family and Children Services (DFACS) or any other Federal, state, or local organization, provided that the program's purpose is to prepare low-income individuals for economic independence. Such participation must be for a minimum of twenty (20) hours per week and must be verified, in writing, by the training, education or employment provider.
CHAPTER 10: PAYMENT AND SUBSIDY STANDARDS

Payment Standards

As required by HUD, AHA adopts payment standards between 90 and 110% of the HUD-established Fair Market Rent for the Atlanta Metropolitan Statistical Area. AHA’s current payment standards for all bedroom sizes are equal to the Fair Market Rent, published on October 1, 2001.

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Subsidy Standards

Also in compliance with HUD requirements, AHA has established a subsidy standard for determining the designation of housing voucher unit sizes. AHA’s subsidy standards have been designed to provide for a minimum commitment of subsidy while avoiding overcrowding. HUD Housing Quality Standards allow two persons per living/sleeping room. Families may choose to use a living room, den or recreation room as a sleeping room if they desire.

Housing Voucher unit size determination will be made using following criteria:

a. No more than two persons per bedroom

b. It will not be necessary for adults of different generations or opposite sex, except for spouses (or those living as spouses) to occupy the same bedroom.

c. Two children of the same sex are expected to share a bedroom.

d. Single persons and single parents with a child under the age of five will be assigned to one-bedroom units.

e. Foster children will be included as household members to determine unit size.

f. Space may be provided for a child who is away at school but who lives with the family during school recesses. Space will not be provided for a family member who will be absent most of the time, such as a member who is away in the military.
However, a child who is temporarily away from the home because of placement in foster care is considered a member of the family in determining the family unit size.

g. Authorized live-in aides/assistants will be assigned a separate bedroom.

h. To determine unit size for Housing Choice Voucher issuance, families will not be expected to use rooms other than bedrooms for sleeping purposes.

i. A child is defined as a minor who is a person under the age of 18 who is neither the head of the household nor spouse.

The unit size on the Voucher remains the same as long as the family composition remains the same, regardless of the actual unit size rented.

**Unit Size Guidelines**

These guidelines determine the unit size assigned to the family:

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**Requesting a Larger Unit Size**

Special circumstances may dictate a larger unit size than the Subsidy Standards show such as Spouses who, because of a verified medical reason, cannot share a bedroom; or an elderly, handicapped, or disabled person who requires a live-in attendant.

Families must provide written documentation to support a request for an increase in unit size within ten (10) days of the initial determination of unit size by the AHA. The granting of the exception shall be at the discretion of AHA. The Assistant Director for Housing Operations will review all requests and make a determination on a case by case basis.
Deviation from Unit Size Guidelines

If any standards other than these are used in determining Housing Choice Voucher unit size issuance, the reason for the deviation from the standards will be recorded in the family’s file.

Changes in Assigned Housing Voucher Unit Size

Housing Choice Voucher Issuance Prior to Lease-up

If the Housing Choice Voucher holder's household composition changes prior to lease-up, the family is required to report that change within ten (10) days to the AHA. The AHA will verify the new family composition information and change the Voucher unit size if necessary. The family will be notified of any change to their Voucher unit size.

Voucher Issuance After Lease-up

Housing Choice participants are required to report to AHA any changes in their household's family composition of income within ten (10) days. If necessary, AHA will change the Voucher unit size to correspond to the household's new composition. The Voucher unit size will only be changed at annual recertification, or when the family requests that AHA issue a Voucher to permit the family to move to a new unit.

Erroneous Housing Voucher Unit Size

If AHA made an error that resulted in a larger unit size designation, the family will be issued a Voucher of the appropriate size at the family's next annual recertification. If the AHA made an error that resulted in a smaller unit size designation, AHA will make the correction immediately and notify the family and owner of the error in unit size and adjust the subsidy accordingly.

Actual Unit Size Selected

The Unit Size Guidelines are used to determine the size of the Housing Choice Voucher to be issued to the family for rent calculation purposes; however, families may select a different size dwelling than that stated on the Voucher.

Families may lease a unit smaller than stated on their Voucher if the Subsidy Standards are met. However, the family will receive subsidy based on the smaller unit payment standard.
Likewise, families may elect to lease a unit larger than the size stated on their Voucher, as long as the family’s share of the rent remains affordable to them. If the gross rent exceeds the applicable payment standard, the family may not pay more than 40% of their monthly adjusted income towards the rent and average cost of utilities. The utility allowance for the actual size unit will be used to determine if the family has exceeded the 40% rent burden limit.

AHA will counsel families on the potential problems of exercising these options, but the ultimate decision is the participant’s, provided the unit meets HQS, the rent is reasonable, and the family meets the 40% rent burden test.
CHAPTER 11: ISSUANCE AND FAMILY BRIEFINGS

Mandatory Briefing Attendance

A family must attend a briefing session in order to receive a Housing Choice Voucher from AHA. The purpose of the briefing is to fully inform the participant about the Section 8 HCVP Program so that he/she will be able to discuss it with prospective participating owners. Families are briefed in accordance with HUD rules and regulations.

Briefing Locations

Briefing sessions are presented in the AHA office or AHA designated facility to groups of families or individual families as needed. Individuals requiring an interpreter, advocate, in-home visit, another briefing location, or who have other special needs will be accommodated upon notification of the need for different briefing arrangements. Briefings are held at least twice a week and more frequently if needed.

If a voucher is available to be issue, it is the policy of AHA to offer a briefing appointment within 10 days from the date of the final eligibility determination. Timely briefing appointments ensure that the AHA complies with HUD's requirement to make an eligibility determination and issue a voucher within 60 days from the date of selection from the waiting list.

Failure of an applicant to participate in a scheduled briefing shall result in denial of housing assistance. The applicant will be notified the denial and his/her right to an informal review. Families may have one excused absence for extenuating circumstances, and may be scheduled for the next group briefing for that assistance.

Briefing Content and Activities

The AHA utilizes verbal presentation, demonstrated examples, and a Family Handbook to ensure that the program rules and AHA procedures are understood. The following items are explained to the family:

♦ Housing Voucher Unit Size
♦ Housing Voucher Term
♦ AHA Voucher Extension Policy
Housing Voucher Unit Size

AHA explains to the family that the housing voucher unit size is based on the subsidy standards established by AHA. See previous chapter for AHA’s policy for determining housing voucher unit size.

Housing Voucher Term and Extensions

The initial term of the Housing Voucher is 60 days with opportunity for extension based on a written request with documentation of the attempt to find a unit within the initial time period. AHA is especially aware of the longer search periods that may be need by families requiring 3 or more bedrooms and persons with disabilities and will accommodate those families upon receipt of a written request.

Tolling Policy

When the family submits a Request for Tenancy Approval, any time remaining on the voucher may be used if the unit is later rejected for participation in the program.
Family Obligations

In accordance with HUD requirements, AHA staff review and explain the Family Obligations presented on the Housing Voucher for participation in the Section 8 Housing Choice Programs. AHA staff explain that violations of the Family Obligations for household members or guests is grounds for termination of housing assistance.

The family must:

1. Supply any information that the AHA or HUD determines to be necessary including evidence of citizenship or eligible immigration status, and information for use in regularly scheduled re-examination or interim re-examination of family income and composition. Two missed appointments to supply AHA with this information are considered a breach of a family responsibility. Increase in family income above $100 a month must be reported to the HA within 30 days from the effective date of change.

2. Disclose and verify social security numbers and sign and submit consent forms for obtaining information.

3. Supply any information requested by the AHA to verify that the family is living in the unit or information related to family absence from the unit.

4. Promptly notify the AHA in writing when the family is away from the unit for an extended period.

5. Allow the AHA to inspect the unit at reasonable times and after reasonable notice. Two missed appointments for inspection are considered a breach of this family responsibility.

6. Notify the AHA and the owner in writing before moving out of the unit or terminating the lease.

7. Use the assisted unit for residence by the family. The unit must be the family’s only residence.

8. Promptly notify the AHA in writing of the birth, adoption, or court-awarded custody of a child.

9. Request AHA written approval to add any other family member as an occupant of the unit.

10. Promptly notify the AHA in writing if any family member no longer lives in the unit.

11. Give the AHA a copy of any owner eviction notice.
12. Pay utility bills and provide and maintain any appliances that the owner is not required to provide under the lease.

**The family (including each family member) must not:**

1. Own or have any interest in the unit (other than in a cooperative, or the owner of a manufactured home leasing a manufactured home space).

2. Commit any serious or repeated violations of the lease.

3. Commit fraud, or bribery or any other corrupt or criminal act in connection with the program.

4. Participate in illegal drug or violent criminal activity.

5. Sublease or let the unit or assign the lease or transfer the unit.

6. Receive Housing Choice Voucher program housing assistance while receiving another housing subsidy, for the same unit or a different unit under any other Federal, State or Local housing assistance program.

7. Damage the unit or premises (other than damage from ordinary wear and tear) or permit any guest to damage the unit or premises.

8. Be related to the landlord. The landlord cannot be the parent, child, grandparent, grandchild, sister or brother of any member of the participating family. The only exemption that may be approved by the AHA is if a family member is a person with disabilities.

9. Engage in illegal use of a controlled substance; or abuse of alcohol that threatens the health, safety or right to peaceful enjoyment of the premises by other residents and persons residing in the immediate vicinity of the premises.

10. Engage in threatening, abusive or violent behavior toward any AHA personnel.

If the Housing Authority terminates the assistance of a participant for violation of a Family Obligation, the Housing Authority will give said participant the opportunity to contest the Housing Authority’s decision through the informal hearing process.

**School Attendance**

In keeping with the requirement to fulfill all obligations under the lease which includes the requirement to comply with state and local laws, AHA requires
families to comply with school attendance requirements in order to be a family in good standing in the Housing Choice Program. Families with children under the age of 16 who have more than five days of unexcused absences from school will be considered in violation of the family obligations which is grounds for termination of assistance.

**Determination of Subsidy and Identifying the Applicable Payment Standard**

At the briefing, AHA staff provide examples of how the subsidy is determined. In addition, AHA staff explain the availability of the exception payment standard for units that are rated ‘A’ properties or properties located within low poverty census tracts. For the City of Atlanta, low poverty census tracts are those census tracts with poverty levels less than 29%. The property rating system is explained in Chapter 15, Rent Reasonableness.

**Security Deposit Requirements**

24 C.F.R. 982.313 provides that the owner may collect a security deposit from his/her Section 8 HCVP assisted tenant. It is AHA’s policy to prohibit security deposits in excess of private market practice or in excess of amounts charged by the owner to unassisted tenants.

**Housing Search Assistance**

AHA’s Family Handbook provides tips on how to find a suitable unit, including things to consider when picking a unit location and how to successfully present themselves to prospective landlords.

**Available Units Listing**

AHA provides a copy of current available units listings for families issued a voucher. The list is organized according to number of bedrooms, and includes unit location, tenant-paid utilities, amenities, and proximity to services.

**Information Provided to Owners**

It is the policy of AHA to disclose upon request, the family’s previous success in complying with the Family Obligations and provisions of the Lease Agreement. If the family’s rental or program history is not known, AHA will state that the family history is not known.

AHA, is not however, providing a reference for the family nor making a suitability determination for the owner. It is up to the owner to screen and check references in order to determine the best candidate to rent his/her unit. The disclosure to owners is explained to families at the briefing and included in the Family Handbook.
Fair Housing Laws and Discrimination Complaint Form

AHA verbally explains the fair housing requirements and remedies and a description of the fair housing laws and the actual HUD 903 Discrimination Complaint Form is included in the Family Handbook.

Portability

In accordance with HUD requirements, AHA staff verbally explain portability and the Family Handbook includes a listing of contact persons in neighboring housing agencies.

Rent Reasonableness

AHA explains to families the rent reasonableness and comparability requirement for all initial rents and subsequent annual rent increases requested by owners. A description of AHA’s Rent Reasonableness is explained in the Family and Owner Handbooks provided at the Family and Owner briefings.

HQS Requirements

It is AHA’s policy to provide in the Family Briefing Packet, A Good Place to Live, the HUD publication that describes the housing quality standard requirements for participation in the Housing Choice Program.

Lead-Based Paint Hazards

The Family Handbook outlines the hazards of lead-based paint and it is AHA’s policy to include EPA brochure, Making Your Home Lead-Safe, in the briefing packet. Families sign a certification indication a receipt of this information and their awareness of the dangers of lead in the home.

In compliance with HUD requirements, the following information is also presented at the Family Briefing and is included in the Family Handbook and is addressed further in other sections of this Administrative Plan.

♦ Inspections Procedures
♦ Leasing Procedures
♦ Provisions of Lease Addendum
♦ Prohibited Lease Provisions
♦ HAP Contract Execution and Payments
♦ Annual and Interim Reexam Procedures
♦ Termination of Lease and Relocation Procedures
♦ Fraud and Program Abuse
♦ Termination of Assistance
♦ Informal Hearing Procedures

Issuance of Vouchers for Changes in Household Size

In order to ensure that the appropriate level of subsidy is provided to all program participants in the Housing Choice Program, there are circumstances when a Housing Choice Voucher will be issued to a participant before the next eligible family on AHA's waiting list. It is AHA's policy to issue the next available voucher in the following order:

1. A participant family whose family composition has changed and is living in a unit which is now overcrowded or under-occupied based on AHA's subsidy standards for the current family size.

2. A participant family whose family composition has changed, but is not living in a unit which is overcrowded or under-occupied or a participant family whose family composition has changed, and is living in a unit which is under-occupied.

3. An incoming portable family for whom AHA administered the voucher because AHA vouchers were unavailable. This family will be offered one of AHA's Voucher when one becomes available and the family will be absorbed into the AHA Section 8 Housing Choice Program.
AHA’s Jurisdiction

AHA will execute Housing Assistance Payments Contracts for families selecting units located within the City of Atlanta and for areas within ten miles of the city’s boundaries (subject to the consent of an already established authority operating a Housing Choice Voucher Program within such area outside of the City of Atlanta boundaries.)

Responsibility for Locating Suitable Housing

Once a Housing Choice Voucher has been issued, it is the family’s responsibility to locate suitable housing. The list is made available to Housing Choice Voucher holders. AHA will provide assistance to those families who require additional assistance in locating housing. Examples of this include families requiring units with three or more bedrooms and families with persons requiring an accessible unit. AHA will provide suitable assistance to these families upon request.

Available Units Listing

To assist families in finding suitable housing, AHA maintains a current and substantive list of vacant units that are available for rent, including a list of accessible units. It is the policy of the AHA to provide the available units listing to Housing Choice Program voucher holders at the Family Briefing and program participants upon request. AHA also posts the available units listing on the AHA website.

Eligible Housing Types

All housing structure types, including but not limited to single family, duplex, triplex, fourplex, garden apartments, townhouses, and high-rises are eligible units for the Housing Choice Program provided the family’s share of the rent is affordable and the unit complies with Housing Quality Standards. Mobile homes are also eligible housing types, as long as the family leases both the mobile home unit and the pad.

Affordability is determined based on the HUD-established rent burden test where the family may not pay more than 40% of the family’s adjusted monthly income towards rent and utilities at the time of initial lease-up.
Ineligible Housing Types

In accordance with HUD regulations, public housing, Indian housing, nursing homes, board and care homes, psychiatric or medical or nursing facilities, college or school dormitories, penal, reformatory, medical, or mental institutions are not eligible units for participation in the Housing Choice Voucher Program. Any unit occupied by its owner or a by a person with any interest in the unit is also ineligible.

In addition, units receiving Section 8 assistance under the Section 8 New Construction, Substantial Rehabilitation, Moderate Rehabilitation or other project-based assistance program are not eligible for lease-up with a Housing Choice Voucher whether the units receiving project-based assistance are owned by AHA or a private owner. However, a Housing Choice Voucher Holder may elect to relinquish their assistance in order to receive a project-based form of Section 8 assistance.

Restrictions on Leasing from Relatives

In accordance with 24 CFR 982.306 (d), families may not execute new leases in properties where the unit is owned by a parent, child, grandparent, grandchild, brother, or sister of any member of the family, unless leasing the unit is necessary to accommodate a person with a disability. AHA reviews requests for an accommodation on an individual basis and will make the determination to permit the receipt of assistance in an immediate relative’s unit based on information provided by the family.

Low-Poverty Neighborhoods

It is the policy of the AHA to explain to families the potential benefits of living in low-poverty neighborhoods. In addition, AHA aggressively recruits owners with available rental units and monitors the success of their marketing efforts by maintaining reports on the lease-up success rate of families in low poverty neighborhoods.

AHA further supports lease-up in low-poverty neighborhoods by approving the use of the 110% of FMR payment standard for families who lease units that earn an “A” quality rating in a low-poverty census tract.
Promoting Housing Choice

It is the stated goal of AHA to promote freedom of housing choice for voucher holders, while pursuing strategies that ensure the deconcentration of very low income and minority families in the various communities within its jurisdiction. The following policies address this twofold goal.

Except as stipulated in paragraph two of this section, AHA shall not directly or indirectly reduce the voucher holder’s opportunity to choose among the available units in the housing market, either in the provision of assistance to any voucher holder in finding an available unit, or by any other action.

AHA supports HUD’s goals for deconcentration and the furtherance of meaningful fair housing choice for low income families but recognizes that according to federal regulation, participation by a property owner as a Section 8 Housing Choice landlord is a privilege and not a right.

Deconcentration Initiative

Therefore, in seeking to achieve the goal of deconcentration of low income and minority families, AHA will refuse to enter into a HAP contract with any landlord if more than forty percent (40%) of the units in a multifamily development containing twenty-five (25) or more units will be assisted under either Section 8 or Section 9 of the United States Housing Act of 1937, as amended, unless (a) the development has been designated as housing for the elderly or for persons with disabilities; or (b) the development was built or rehabilitated under the Project-Based Certificate Program.

For the purpose of defining goals for deconcentration reporting purposes, low poverty areas are those census tracts within AHA’s jurisdiction with 29% or less of the households with total household incomes at or below the poverty level as defined by the U. S. Census Bureau.
CHAPTER 13: PORTABILITY

Statutory Portability

Under statutory portability, families may choose to receive rental assistance in another area outside of AHA’s jurisdiction, but within the state of Georgia.

Depending on the location chosen, the family may port to the housing authority in the area or AHA may choose to administer the contract, depending on the feasibility and accessibility in providing services to the family.

Both initial lease-up and participant families may exercise statutory portability as long as the family has not violated any Family Obligations, is current on a Repayment Agreement and has not moved under portability within the last twelve months.

Regulatory Portability

Regulatory portability is the ability of families to move outside of the State of Georgia and for families from other States to move to Georgia and continue to receive housing assistance.

Initial Lease-Up

AHA shall allow Housing Choice Voucher families to move to another locality outside of the State of Georgia and receive assistance under the Housing Choice Voucher Program as long as they currently live in AHA’s jurisdiction and hold a valid Voucher.

If the family moves to a locality where there is no receiving PHA, AHA will accept the responsibility of administering the family’s voucher or subcontract the administration to a qualified third-party entity.

Participant Mover Families

It is AHA’s policy to allow participant families to exercise regulatory portability as long as the family has not violated the Family Obligations listed in 24 C.F.R. Section 982.551, the family is current on their Repayment Agreement with AHA, and the family has not moved under portability within the previous twelve (12) month period.
Incoming Portability

It is the general policy of AHA to absorb all incoming portable families into the AHA Housing Choice Program in order to maximize program utilization. However, if the AHA Housing Choice Program has fully utilized program dollars and turnover is not anticipated, AHA will:

1. Attempt to identify a voucher that is currently being administered by the initial agency and exchange vouchers so that both families can be absorbed, or

2. Bill the initial agency for administering the incoming portable voucher

Subsidy Standards

As the receiving PHA, AHA will issue a Housing Choice Voucher according to its subsidy standards and AHA’s policies will prevail. If the family has a change in family composition which would change the Housing Choice Voucher size (and, therefore, the applicable Fair Market Rent or Payment Standard), AHA will change to the proper size Voucher according to AHA’s subsidy standards.

Term of the Voucher and Extensions

As the receiving PHA, AHA will determine whether to extend the Housing Voucher and for what period of time. The family may request an extension from AHA. If the family does not submit a Request for Tenancy Approval within ten (10) days of the date of expiration of the Housing Voucher, AHA will send a notice to the initial PHA and the family indicating the pending expiration of the voucher. If the voucher expires, the AHA will send the initial PHA and family a Notice of Voucher Expiration within three (3) business days from the date of expiration.

Required Documents

As the receiving PHA, AHA will require a written notification from the initial PHA formally authorizing the portable family to exercise portability. The notification shall include a statement of a family in good standing, an executed copy of the current Housing Voucher with issue and expiration dates, a contact person for inquiries on eligibility and billing, and the Administrative fee schedules of the initial PHA. In addition, AHA, as the receiving PHA will request a copy of the portability policies and procedures from the initial PHA.
Review of Household Income/Composition

AHA, as the receiving PHA, will recertify the income of the family if the documents provided are over one hundred and twenty (120) days old or there has been a change in the family’s circumstances.

When Income Exceeds Income Limits

If the family’s income exceeds AHA’s income limit, the family will not be denied assistance. If the family's income is such that a zero dollars ($0) subsidy amount is determined prior to lease-up in AHA’s jurisdiction, AHA may refuse to enter into a contract on behalf of the family at $0 assistance.

Required Briefing

A briefing will be mandatory for all incoming portability families. The briefing will be scheduled within ten (10) working days after AHA receives the documents from the family or the initial PHA.

Notification Upon Lease-Up

If the family leases up successfully, AHA will notify the initial PHA within ten (10) working days, after approval of the lease, and the billing process will commence.

Portability Mover Families

AHA will notify incoming portable families of their responsibility to contact AHA’s office if the family wishes to move outside AHA’s jurisdiction under continued portability. AHA will notify the initial PHA in writing of the family’s decision to relocate outside of AHA’s jurisdiction within three (3) working days of the receipt of the Notice to of Intent to Vacate.

A family may exercise portability only one time in a twelve - (12) month period.

Termination of Assistance

AHA will notify the initial PHA in writing of any termination of assistance to families within ten (10) working days of the termination of assistance.

If an informal hearing is requested by the family, the informal hearing will be conducted by AHA, using the informal hearing procedures included in this Administrative Plan. A copy of the informal hearing decision will be furnished to the initial PHA within (10) ten days of the informal hearing.
Repayment Agreements

If the initial PHA notifies AHA that the family is in arrears by missing payments in a previously executed Repayment Agreement or the family refused to sign a Repayment Agreement, AHA will refuse to issue another Housing Choice Voucher to the family to move to another unit.

Billing

If AHA administers the initial PHA’s voucher, AHA will bill the initial PHA monthly for housing assistance payments. The billing cycle for other amounts, including administrative fees, hard to house fees, special claims paid, etc.; will be monthly unless requested otherwise by the initial PHA.

AHA will bill as follows:

♦ One hundred percent (100%) of the housing assistance payment;
♦ One hundred percent (100%) of the special claims;
♦ One hundred percent (100%) of the hard-to-house fees, and
♦ Eighty percent (80%) of the administrative fee (at the initial PHA’s rate) for each portable Housing Choice Voucher leased as of the first day of the month.

AHA will notify the initial PHA of changes in subsidy amounts resulting from income and household composition changes or unit transfers, and will expect the initial PHA to notify AHA of changes in the administrative fee amount to be billed.

Outgoing Portability

Outside the State of Georgia (Regulatory Portability)

AHA will determine if the receiving PHA administers a Housing Choice Voucher Program. If the receiving PHA does administer its own Housing Choice Voucher program, AHA will determine if the receiving PHA will absorb the family into its own program or administer the AHA’s voucher. AHA will document the decision to absorb or administer the voucher in the family’s file.

If the receiving PHA does not administer its own Housing Choice Voucher program, AHA will determine if the receiving PHA wishes to administer the Housing Choice Voucher and bill AHA.

Within the State of Georgia (Statutory Portability)

If the receiving PHA administers its own Housing Choice Voucher program, AHA will determine if the receiving PHA will absorb the family into its own program or
administer AHA’s voucher. AHA will document the decision to absorb or administer AHA’s voucher in the family’s file.

If the receiving PHA does not administer its own Housing Choice Voucher program, AHA will administer the assistance directly, or subcontract with another PHA or other qualified entity in the vicinity.

Documentation

AHA, as the initial PHA, will provide the following information in writing to the receiving PHA:

1. A document, with issue and expiration dates, formally acknowledging the family’s ability to move under portability;

2. Persons designated for inquiries on eligibility and billing;

3. The administrative fee schedule for billing purposes; and

4. A copy of the portability policies and procedures from this Administrative Plan.

Absorption

If the receiving PHA decides to absorb the family into its own Program, the receiving PHA must notify AHA within ten (10) working days from the receiving PHA’s interview with the family.

Request for Tenancy Approval

When a portable family leases up or fails to submit a Request for Tenancy Approval by prior to the expiration of the Housing Voucher, AHA should be notified in writing within ten (10) working days.

Reimbursement

When billed, AHA will reimburse the receiving PHA as follows:

♦ One hundred percent (100%) of the Housing Assistance Payment,
♦ One hundred percent (100%) of the hard-to-house fees;
♦ One hundred percent (100%) of the special claims paid, and
♦ Eighty percent (80%) of AHA’s administrative fee.
AHA will requisition funds from HUD based on the anticipated lease-ups of portable Housing Choice Vouchers in other AHA jurisdictions on a quarterly basis. Payments for families in other jurisdictions will be reserved for payment to other PHA's when billed.

Mover Families

Receiving PHA's are requested to provide written notification to AHA of the family's request to move to an area outside of the receiving PHA's jurisdiction within 10 days of receipt of the Notice of Intent to Vacate from the family.

Termination of Assistance

Receiving PHA's are requested to provide written notification within ten (10) working days to the AHA of termination of assistance to the portable family. If an informal hearing is requested, receiving PHAs are requested to submit informal hearing determinations to the AHA within ten (10) working days.
CHAPTER 14: REQUEST FOR TENANCY APPROVAL

Request for Tenancy Approval

The Request for Tenancy Approval (RTA) and a copy of the owner's proposed lease must be submitted prior to the expiration of the Housing Choice Voucher. The Housing Choice Voucher shall expire at the end of one hundred twenty (120) days unless, within that time, the family submits a Request for Tenancy Approval.

On the RTA the owner will certify to AHA that the proposed rent is comparable to the rents previously charged or explain the reason for any difference. AHA regards the owner’s certification as the basis for approving the current rent and will take aggressive corrective action against owners who charge more than the approved rent or obtain a higher rent to assisted families than unassisted families.

The Request for Tenancy Approval Form (RTA) must be signed by both owner and Housing Choice Voucher holder and submitted along with an unexecuted copy of the owner’s lease. AHA will review the documents to determine whether or not they are approvable.

Owner’s Lease

It is the policy of AHA to review the owner’s lease to ensure that the lease contains provisions that permit the owner to terminate tenancy and institute a judicial action to evict if:

1. The tenant, household member, guest, or person under the tenant’s control engages in drug-related criminal activity on or near the premises.

2. Any household member is illegally using a drug or there is a pattern of illegal drug use that interferes with the health, safety, or right to peaceful enjoyment of the premises by other residents

3. Any household member engages in any criminal activity that threatens the health, safety, or right to peaceful enjoyment of the premises by other residents (including property management staff)
4. Any household member engages in any criminal activity that threatens the health, safety, or right to peaceful enjoyment of the premises by persons residing in the immediate vicinity or the premises.

5. Any household member, guest, or person under the tenant’s control engages in violent criminal activity

6. The tenant is a fugitive felon or parole violator

7. There is evidence of criminal activity whether or not there has been an arrest or conviction for the crime.

If the lease is approved, AHA will contact the owner to schedule a Housing Quality Standards inspection. To be eligible for program participation, the units must meet minimum Housing Quality Standards and any AHA adopted performance criteria specified in this Administrative Plan and approved by HUD.

**Required Physical Address and Proof of Ownership**

On the RTA, Owners must provide the current address of their residence and mailing address. A post office box address will be acceptable for purposes of correspondence as long as a physical address is also presented. Owners must also submit proof of ownership of the property and proof of a Management Agreement if the property is managed by an agent.

**Request for Taxpayer Identification Number and Certification (W-9)**

It is the policy of AHA for owners to submit a W9 form along with the Request for Tenancy Approval.

**Local Representatives**

Owners who have property in AHA's Section 8 HCVP Program and reside outside Dekalb, Cobb, Fulton, Fayette and/or Clayton counties, must designate a local representative for the purpose of scheduling inspections and as a source of contact for emergencies.
Lead-Based Paint Disclosure

AHA regards the owner’s signed disclosure the presence of lead-based paint or lead-based paint hazards in the unit as a basis for approving a unit in the Housing Choice Program where the presence of lead can not be observed by the AHA inspector.
CHAPTER 15: HQS INSPECTIONS

General Requirements

AHA is required by HUD regulations to inspect units to ensure they are “decent, safe, and sanitary” according to the Federal Housing Quality Standards (“HQS”). No unit will be initially placed on the Section 8 Housing Choice Program unless these standards are met. Units must also continue to meet HQS for as long as the family remains in the unit with Section 8 Housing Choice assistance.

Encouraging Quality Housing Units

It is AHA’s goal and policy to recruit owners with quality housing units to the Housing Choice Program. Therefore, efforts are made to encourage owners to provide units that exceed HQS standards. Owners who offer units that earn an “A” quality rating in a low poverty neighborhood, will be eligible to have rents approved based on the 110% of Fair Market Rent payment standard. It is the policy of AHA to disprove marginal housing units for participation in the Section 8 HCVP Program. If it appears that the condition of the unit will fall below the level of the Housing Quality Standards during the term of the HAP Contract, AHA will reject the unit.

Inspections Conducted

To ensure compliance with program regulations, AHA completes the following type of unit inspections:

- Precontract Inspections - Prior to assistance beginning in a unit.
- Annual Inspections - At least once in a 12 month period as long as the family resides in the unit
- Special Inspections - To address landlord or family complaints on failure to make repairs or maintain the unit.
- Quality Control Inspections - To ensure consistent application and enforcement of HQS among the AHA inspections team
- Courtesy Inspections - To encourage owner participation in the Housing Choice Program
Precontract Inspections

AHA will schedule an inspection of the unit within three business days of receipt of the Request for Tenancy Approval and copy of the owner’s unexecuted lease. AHA will conduct and record the Pre-Contract Inspection using the AHA designed, HUD-approved inspections checklist.

A Notice of Inspection Results and a copy of the inspection report will be provided to the family and the owner within three business days of the completed inspection. If the unit fails the HQS inspection, the family and owner will be advised of the repairs required to meet HQS compliance.

On an initial inspection, the owner will be encouraged to make the repairs as promptly as possible. However, no more than thirty (30) days will be allowed for completion of the repairs. To request a second inspection of the unit the owner must submit a signed certification of completed repairs to the AHA. AHA will conduct a maximum of two reinspections to confirm completion of required repairs.

If the unit fails two inspections, AHA will not consider the unit any further and will advise the family to select another unit. The family will have the remaining time on their voucher from the date the RTA was submitted to look for another suitable unit and submit a new Request for Tenancy Approval form.

Annual Inspections

AHA will identify the names of participants due for a unit inspection ninety (90) days in advance of the anniversary date of the HAP Contract. Annual inspections for mid-month move-ins will be conducted no later than the following year by the first of the move-in month. AHA will provide no less than 10 days written notice to families and owners of their scheduled annual inspection.

If a unit fails inspection, the owner will be provided 30 days to complete the required repairs. Extensions to the 30-day period may be requested, however the Inspections Manager must approve them. Owners must submit a signed certification of completed repairs and request a reinspection appointment. If the repairs are not completed within the 30-day time period or approved extension period, the owner’s payment will be abated. Payments will not be made for the period in which the unit did not meet HQS.
Special Inspections

AHA will conduct special inspections on units if at any time the family or owner reports that the unit does not meet Housing Quality Standards.

If a special inspection results in the identification of an emergency HQS violation, the owner will be notified to correct the deficiency within 24 hours. If the owner fails to correct the deficiency HAP will be abated, and AHA will initiate proceedings to terminate the Housing Assistance Payments Contract.

If the special inspection results in the identification of non-emergency HQS violations, the owner will be required to correct the deficiency within the specified timeframe.

If the special inspection reveals an HQS violation as a result of the family’s failure to comply with the terms of the lease or Family Obligations, the family will be given a timeframe in which to correct the situation or be terminated from the Housing Choice Voucher Program.

Quality Control Inspections

In order to ensure consistent and compliant application of Housing Quality Standards, AHA will reinspect a minimum of 5% of all units approved. Quality Control Inspections will be conducted on recently inspected units by the Inspections Manager and Senior Inspector. Quality control inspections will be randomly selected, but will be evaluated to ensure that a cross section of unit types, neighborhoods, and inspectors is being reviewed. Quality control inspections will be retained and analyzed to note trends, which may indicate the need for additional staff training or owner education.

If a consistent or frequent HQS deficiency is noted for a particular property (ies), the owner or owner representative will be requested to attend a meeting with the Inspections Manager to review the requirements that are not being met. The Inspections Manager will identify the items to be corrected and establish a timeframe for owner compliance.

If inadequate performance of any HQS Inspector is noted from the quality control review, additional training will be conducted with the HQS Inspector followed by a performance improvement plan to ensure success in the next quality control review.

Courtesy Inspections

AHA will conduct courtesy inspections on units for prospective owners interested in participating in the Housing Choice Program. Owners may request to have their properties inspected prior to placing them on the Available Units Listing.
Family Responsibility to Permit Inspection

If the family is not able to be at home, the head of household must call to reschedule the appointment or make arrangements to have an adult representative or the owner present. If the family misses the inspection appointment, and does not arrange for the representative or the landlord to be there, one more inspection or reinspection appointment will be scheduled. If the family misses two inspection appointments, AHA will consider the family to have violated a Family Obligation, and AHA will begin proceedings to terminate the family’s assistance.

Issuance of HAP and Abatement Policy

It is AHA’s policy to withhold the next HAP check to be issued when a unit does not meet HQS. AHA maintains that the owner is responsible for complying with HQS throughout the entire term of the HAP Contract and that the owner should be prepared for the annual inspection based on the advance notice provided by AHA.

If an owner completes the required repairs within the allotted timeframe the owner will receive the full housing assistance payment. If the owner does not complete the repairs within the allotted timeframe or the inspector is prevented from reinspecting the unit, the owner will receive a Notice of Abatement, indicating that the Housing Assistance Payment for the unit has been stopped due to failure to meet HQS.

If the inspector encounters other HQS deficiencies during a reinspection, the owner will be notified and the same notification procedures will be followed.

Participant families may withhold payment of rent during this period in accordance with the provisions of state law contained in Title 44 of the Official Code of Georgia (Chapter 7, Landlord and Tenant).

Acceptability Criteria and AHA-Adopted Exceptions to HQS

AHA adheres to the Code of Federal Regulations at Title 24 Part 982 Sections 404, 405 and 406, applicable HUD Handbooks; Housing Inspections Manual, H-605, and HUD supplements in order to determine, enforce, and monitor the acceptable criteria for HQS for approving units in the Housing Choice Voucher Program.
In addition, AHA has adopted the following local requirements in determining compliance with HQS requirements for properties participating in the Section 8 HCVP Program:

1. To ensure that units meet the Interior Air Quality requirements, the HACA requires that “the unit must have adequate air circulation.” All units whether or not they have been provided air conditioning units or evaporative coolers by the landlord will be required to have screens on exterior windows designed to open. The owner will be responsible for maintaining the screens during the term of the contract.

2. Water heater must be equipped with the correct temperature-pressure relief valve according to the pound per square inch (psi) required for the size of water heater as determined by the manufacturer’s recommendation.

3. A ¾” discharge pipe must be installed on the water heater temperature pressure relief within six inches (6”) of the ground. If the discharge pipe is not routed to the exterior of the unit, it must be routed into a drain.

4. Pilot lights, which are present on gas stoves, must be in proper working order.

5. Locks designed for exterior use are required on all exterior doors and shared basement doors.

6. The minimum bedroom ceiling height is 7 feet and the area of a room adequate to serve as a bedroom must be at least 7’ X 10’ with at least one electrical outlet and an operable window.

7. Bedrooms shall have at least four (4) square feet of closet space for personal effects of occupants.

8. Dwelling units with two (2) or more bedrooms must have a room arrangement that permits access to the bathrooms or commonly used rooms without passage through the bedroom.

9. All units must have grass.

10. Units shall have “good curb appeal”, this means that the lawns, and shrubbery shall be well maintained. They must be cut, edged and trimmed on a regular basis.

11. All windows in the unit that were designed to open must function.
12. If a house is designed to have gutters must and they must be clear of all debris.

13. What are the rules on burglar bars?

14. 

Local Housing Codes

HQS will take precedence over State and/or local housing codes unless State and/or local codes are more restrictive, in those cases AHA will adhere to the more stringent State and/or local housing code(s).

HQS Emergency Items

Deficiencies that present an immediate danger or threat to the health and/or safety of the family are noted as HQS Emergency Items. It is AHA’s policy to note the following HQS violations as emergency items:

1. Fire of any nature
2. Gas leaks
3. Dangerous structural hazard.
4. Sewer back-ups.
5. Entrance doors kicked in.
6. Complete electrical power outage.
7. No air conditioning in high-rise buildings.
8. Refrigerator not working.
9. Wires sparking and/or smoking.
10. Main entrance door release inoperable (high-rise only)
11. Elevators not operating properly. (Building has one elevator)
12. Flooding in unit.
13. Broken water supply lines.
14. Toilet clogged (only one bathroom in the unit).

AHA will advise the owner of the serious deficiency and specify that the emergency deficiency must be corrected within 24 hours. The notice to the owner specifies that the Housing Assistance Payments will be abated and/or the Housing Assistance Payments Contract terminated, if the repairs are not completed within the specified time period. Due to the exigent nature of the deficiency, notice to the owner may be completed by phone contact, hand-delivery or mail.
Terminations of HAP Contract

If the owner fails to correct all HQS deficiencies by the end of the abatement period, the owner will be sent a Notice of Pending HAP Contract Termination. The Notice will advise the owner that he/she is in default of the HAP Contract for failure to comply with applicable housing quality standards as outlined by AHA. The Notice will indicate that the HAP Contract will be terminated by a specific date. The effective date of the termination will be the earlier of thirty (30) days from the date of the Notice or the anniversary date of the HAP Contract. The Notice will also state the remedies that the owner may pursue; in order to cure the default and have the HAP Contract reinstated.

The abatement of the Housing Assistance payment will remain in effect during the period of the termination notice. If the owner files a written request for reinstatement pursuant to the termination notice, AHA will reinspect the unit to ensure HQS compliance, provided the participant chooses to remain in the unit. If the unit is determined to be in compliance with HQS, AHA will rescind the termination notice and reinstate housing assistance payments from the date the unit passed inspection.

If the owner fails to address the deficiencies within the allotted timeframe, AHA will terminate the housing assistance payments contract on the specified effective date and send a Notice of Final Termination of the Housing Assistance Payments Contract to the owner.

Family-Caused Damages

Owners may charge the family for repairs or additional costs due to family-caused damages in accordance with the provisions of the lease.

If the family fails to take the necessary action to address the family-caused HQS violations, AHA will issue a Notice of Pending Termination of Assistance for failure to comply with the Family Obligations and responsibilities under the lease. The Housing Assistance Payments Contract will terminate upon termination of the family’s participation in the Housing Choice Program. AHA will provide no less than 30 days notice to the owner on the pending termination of the family’s assistance and the HAP Contract due to family-caused HQS violations.
CHAPTER 16: RENT REASONABLENESS AND RENT NEGOTIATION

Rent Reasonableness Certification for Every Unit

AHA will certify and document on a case-by-case basis that the approved rent does not exceed rents charged by the owner for comparable unassisted units in the private market, and that the rent is reasonable in relation to rents charged by other owners for comparable units in the private market. It is the policy of the AHA to identify three (3) comparable units, two of which must support the approved rent to owner.

Methodology

As part of the initial inspection and annual reexamination inspection process, AHA performs a rent reasonableness test to ensure that the rent the owner is proposing is comparable to rents for comparable units in the private, unassisted market.

Rent reasonableness is determined by analyzing the local rental market and through contact with owners and property managers of rental property. AHA maintains rent reasonableness information on all areas within AHA's jurisdiction.

Factors of Comparability

The following items are considered to determine rent reasonableness and unit comparability:

♦ Number of bedrooms
♦ Unit size
♦ Utility, Appliances and Services Arrangement
♦ Gross rent charged by the owner
♦ Unit Location, Proximity to Services
♦ Unit Type and Age (date built)
♦ Quality
♦ Amenities
♦ Facilities
♦ Management and Maintenance Services
♦ Accessibility to Persons with Disabilities
♦ Date unit was available for occupancy after construction or substantial rehabilitation.

Comparable Units Database

AHA maintains a Microsoft Excel database of comparable units from which the Leasing Specialist can compare the inspector’s rent reasonableness test and unit quality rating to make a rent reasonableness determination.

The database includes information gathered through telephone interviews, market surveys, available unit listings, newspaper listings, and multi-family property unit information. AHA staff extract comparable unit information by zip code, unit size, or census tract. AHA updates the comparable unit database on an annual basis.

It is the policy of AHA to accept for review and consideration comparable rent information submitted by an owner should the owner challenge the rent comparable data on file with the AHA. The comparable data must include the factors of comparability used by AHA in making rent reasonableness determinations.

Certification and Documentation

AHA certifies and documents in every family file that the Contract Rent for the assisted unit is not in excess of rent currently charged by the Owner for comparable, unassisted units.

Negotiation

AHA will present an approvable rent to the owner within 5 business days from the date of the initial inspection and rent reasonableness determination. If the owner is willing to accept the negotiated rent, AHA will execute a HAP Contract with the owner and the owner and the family will enter into a lease agreement and the HUD-required tenancy addendum.

If the owner does not accept the approvable the rent, AHA will reconsider the owner’s proposed rent based on physical modifications or improvements that make the unit comparable to other units.
Annual Rent Increases

In accordance with the HAP Contract, an owner may submit a request for an annual rent increase by providing at least 60 days notice to AHA and the family. AHA will notify the owner of the approval/disapproval of the rent increase based on comparability and rent reasonableness no later than 10 business days from the date of the annual unit inspection.

Contract Rent Increases

Contract Rents shall be adjusted by using either the Annual Adjustment Factors (AAF) published annually by HUD or by special adjustments. Owner/agents will be provided information on the required documentation for special rent adjustments at AHA Owner briefings. Rent adjustments cannot result in material differences between the rents charged for assisted and comparable unassisted units and the unit must still meet rent reasonableness criteria. The unit also must be in decent, safe and sanitary condition and meet all HQS criteria. Finally, the owner must otherwise be in compliance with the terms of the Lease and Contract.

Voucher Program

Contract rent under the Housing Choice Voucher program may not be changed prior to the first anniversary date of the lease. The owner must request rent increases in writing and the request must be submitted to the tenant and AHA at least sixty (60) days before the proposed rent is to take effect. Any proposed rent must meet rent reasonableness criteria. AHA will advise the family as to whether the rent is reasonable, and shall assist in the negotiation of the rent with the owner if requested by the family.
HAP Contract Execution

Following a successful lease approval, unit inspection, and rent negotiation process, the AHA performs final computations of the family's Total Tenant Payment, Family Share of Rent and Utility Reimbursement Payment, if any. The HAP Contract is completed based on this information and presented to the owner for execution.

Signature Briefing

When the final leasing documents are prepared, AHA will contact the appropriate parties to coordinate the signing of the HAP Contract, Lease, and Tenancy Addendum.

To ensure integrity in the leasing and contracting process, AHA requires new owners and the family to come to the AHA office to sign the lease, tenancy addendum and HAP Contract. The owner and family will have the opportunity to ask questions and receive clarification on any questions that they may have in regards to their participation in the Housing Choice Program. On occasion, AHA will mail or hand carry HAP Contracts to owners if the owner is a current owner in the Housing Choice Program and has previously been briefed on program requirements.

Copies of Documents Provide to All Parties

Upon receipt of a signed HAP Contract, lease agreement, and tenancy addendum from the owner and the family, AHA will execute the HAP Contract. The Deputy Executive Director for the Housing Choice Program executes all HAP Contracts. In accordance with HUD regulations, HAP Contracts are executed within 60 days of the effective date of the HAP Contract.

AHA will provide executed copies of the HAP Contract, Lease, and Tenancy Addendum to the owner and the family within 10 business days of the date the HAP Contract is signed.
Separate Agreements

It is the policy of AHA to advise families and owners of the prohibition of illegal side payments for additional rent or for items normally included in the rent of other unassisted families. Information regarding the prohibition of side payments is included in

the AHA Owner and Family handbooks, and is verbally presented at the owner and family program briefings.

AHA does permit, however, owners and tenants to execute agreements for services, appliances (other than for ranges and refrigerators) and other items outside those which are provided under the lease if the agreement is in writing and approved by AHA. This type of agreement is not to be construed as illegal side payments. A separate agreement for services or appliances is permissible as long as:

1. It is not an appliance, service, or other item routinely provided to non-subsidized tenants as part of the lease
2. It is not is permanently installed in the unit
3. The family has the option of not utilizing the service, appliance, or other item.
4. Nonpayment of these agreements cannot be cause for eviction.
5. The charges for the specific items are reasonable and not a substitute for a higher rent.
6. A copy of the agreement for a special item or service is provided to AHA prior to the rent negotiation.

Changes in Family Circumstances Prior to HAP Contract Execution

If any changes to the family's composition or household income occur prior to execution of the HAP Contract, the information will be verified and the TTP will be recalculated. If the family is found to be no longer eligible for the Section 8 HCVP Program, the family will be notified in writing that:
1. The family is no longer eligible to receive Section 8 HCVP assistance.
2. The HAP Contract will not be executed.
3. The family may re-apply for the Section 8 HCVP Program when the waiting list reopens should they become eligible at a later date.
4. The family has a right to an informal review of the decision to deny assistance.

Issuing Payment to Owners

Once the HAP Contract is executed, AHA will issue payment to the owner. To reduce the potential for stolen or lost HAP checks, it is the policy of AHA to have owners provide bank account information so that housing assistance payments may be received through a direct deposit program. Under AHA’s direct deposit program, funds are made available to the owner on or about the first and fifteenth of the month.

The amount of the payment to the owner is specified in the HAP Contract and is based the approved Rent to Owner less the Family’s Share of Rent as determined by AHA.

It is AHA’s policy to require owners to notify AHA in writing of any address change, change in bank account deposit information in order to ensure the accurate and timely deposit of monthly housing assistance payments.

Utility Reimbursement Payments

When the Utility Allowance exceeds the Total Tenant Payment of the family, AHA will issue a monthly Utility Reimbursement Payment to the family. Utility reimbursement checks are made payable to the family.

Replacing Lost Checks

It is the policy of AHA to require a stop payment and bank confirmation that a check that has been lost cannot be cashed prior to issuing a duplicate check.
Change in Ownership

If there is a pending change in ownership due to a sale of a property, the current owner is responsible for notifying AHA in writing of the name and address of the new owner.

A Transfer of Ownership form will be provided by AHA to record the required information and must be completed and signed by both the previous owner and the new owner. To complete the change in ownership process, a copy of the recorded Warranty Deed showing the Transfer of Title must be given to AHA, along with a federal taxpayer identification number or social security number. AHA will update its files and records to reflect the new information received and issue the monthly housing assistance payments to the new owner as indicated in the written request.
CHAPTER 18: ANNUAL AND INTERIM REEXAMINATIONS

Annual Reexamination

In accordance with HUD regulations, AHA conducts an annual reexamination of income and family composition for all families in the Section 8 Housing Choice Program to ensure that:

1. The family is receiving the amount of rental assistance they are entitled to;
2. The family’s household composition is appropriate for the amount of rental assistance they receive and for the unit they lease

Annual Reexamination Interview Scheduling and Notice

AHA utilizes its computer system to track the reexamination due dates for all program participants in order to ensure timely completion of annual reexaminations.

Approximately 120 days prior to the annual reexamination due date, AHA sends a written notification to the head of household indicating the need to come to the office for an annual reexamination interview. The Notice indicates that the head of household is responsible for making arrangements for a different date and time if the specified date is unacceptable.

As part of the Annual Reexamination interview, families will complete and sign an annual reexamination application that provides information on the family’s income, assets, allowances, deductions and household composition. The family is also required to sign the Authorization for the Release of Information so that AHA may verify the information provided by the family.

Determining Annual Reexamination Due Date

It is AHA’s policy that mid-month move-ins (e.g. November 12) will be conducted no later than the first of that month for the following year (e.g. November 1).
If a family moves to another unit at any time other than their original annual recertification date, their new recertification date will be changed to the new HAP Contract's effective date, or for mid-month move-ins, no later than the first of that month for the following year.

**Failure to Attend Annual Reexamination Appointment**

If the family fails to attend its scheduled annual reexamination appointment, the AHA will send a Notice of Pending Termination for failure to provide requested information as required under the Family Obligations. The Notice of Pending Termination will include a new appointment date and time and indicate that if the family fails to keep the appointment or contact the AHA to set up a different date and time, AHA will begin proceedings to terminate the assistance.

If the family does not attend its rescheduled appointment, AHA will send a Notice of Termination of Assistance. The effective date of the termination will be no less than 30 days from the date of the notice or the anniversary date of the Housing Assistance Payments Contract.

The Notice of Termination of Assistance will include an explanation of the family’s right to request an informal hearing within ten (10) working days from the date of the notice.

A copy of the Notice of Termination of Assistance will be sent to the owner.

**Notice of Change**

Upon verification and calculation of the family’s annual income and household composition, AHA will determine the family’s share of rent and housing assistance payment. The new amount will be effective on the scheduled reexamination anniversary date.

AHA will issue a Notice of Change to both the landlord and family to communicate the family’s share of the rent and the housing assistance payment no later than 30 days prior to the anniversary date of the annual reexamination.

If the family is responsible for the delay in the completion of the annual reexamination, (i.e. failed to keep appointments and/or failed to timely provide requested information), AHA will effect the change in the family’s share of the rent on the actual anniversary date of the annual reexamination.
Interim Reexaminations

It is AHA’s policy to require participants to report any increase in gross household income of One Hundred Dollars ($100) or more per month.

In addition, families must report any change in source of income and any change in household composition. Reported changes must be stated in writing and the AHA staff will notify the family within 5 business days as to whether an interim reexamination is required.

Effective Date of Interim Changes

Decreases in the tenant portion of the rent will be effective the first day of the month following the month in which the change was reported. Increases in the tenant's portion of the rent will be effective the first day of the month following a full 30 days notice to the family and owner that the family’s share of the rent has changed.

Other Interim Reporting Requirements

It is AHA’s policy to require AHA staff to perform interim reexaminations on:

1. Families who report no source of income (every 30 days);
2. Families whose annual income cannot be projected with any reasonable degree of accuracy (every 90 days);
3. Families where an error was made at admission or reexamination;
4. Families whose subsidy was based on false or incomplete information.

Standard for Timely Reporting of Changes

The standard for reporting any changes in household income or composition is for the family to report the change, in writing, within thirty (30) days of the date of the change.

AHA will verify all information using third party verification, unless third-party verification proves impossible to obtain. The participant will be required to sign an Authorization for Release of Information Form and any other required verification forms. The participant will also be required to bring any documents they have
substantiating the change. If the participant does not bring the required information to the interview, he or she will be required to return with the documentation within ten (10) working days from the interview date.

If the family does not provide required documentation for a mandatory interim reexamination within the specified ten- (10) day period, the family will be terminated from the program for violating their Family Obligations.

**When a Change is Not Reported in a Timely Manner**

If the family does not report a change in a timely manner, any increase in the Tenant Rent will be effective retroactive to the date it would have been effective, had it been reported on a timely basis.

AHA will enter into a repayment agreement with the family to reimburse AHA for any overpaid housing assistance payments as long as the family:

1. Has signed all previously required repayment agreements;
2. Is current on their payments for all repayment agreements they have signed or were required to sign; and
3. Has not violated any of the other Family Obligations stated on their Certificate/Voucher.

Any changes that result in a decrease in the family’s share of the rent will be made effective on the first of the month following the completion of the interim reexamination.

**Failure to Process Interim Change in a Timely Manner**

Interim reexaminations that result in an increase in the family’s share of the rent will be made effective on the first of the month following the full thirty-day notice provided to the family.

If the interim reexamination resulted in a decrease in the family’s share of the rent and AHA failed to process the change on a timely basis, the family’s share of rent will be calculated retroactively to the date it should have been effective. AHA will reimburse the family for any overpayment made in the family’ share of the rent to the owner.
Changes in Family Composition Resulting in Oversized or Undersized Unit

If the household will be required to move to either a larger or smaller unit as a result of any changes in household composition, such change in units will be made at the family's next scheduled annual recertification, unless a hardship exists. Such hardships must be documented and verified, with AHA's approval for an earlier change in units.
CHAPTER 19: LEASE TERMINATIONS AND FAMILY MOVES

Termination of the Lease By The Owner

The requirements governing owner termination of tenancy are set forth in 24 CFR 982.310. The owner is required to provide AHA with a copy of any notice given to the family terminating tenancy. If a court action results in the eviction of a family, the owner must submit a copy of the eviction order to AHA.

Violation of the lease may be grounds for termination of tenancy by the owner and is a violation of a family obligation for continued Section 8 HCVP assistance. A lease violation will jeopardize the family's Section 8 HCVP assistance.

Termination of the Lease By The Family

After the first annual anniversary of the lease between the participant and the owner/agent, participants must give at least thirty (30) days notice to the owner if they wish to terminate the lease. If the family intends to vacate (after the first annual anniversary of the lease), the family must provide to AHA a written copy of the notice to vacate no less than thirty (30) days prior to the vacate date.

Mutual Rescission of the Lease

During the first term, the family and the owner may mutually agree to "rescind", or, terminate, the lease. The family must provide a copy of the written lease rescission agreement, signed by both the family and the owner/agent, to AHA no less than thirty (30) days prior to the vacate day in order for AHA to perform certifications and rent calculations in a timely manner.

Lease Terminations and the HAP Contract

The HAP Contract between the owner/agent and AHA will terminate on the same day as the agreed lease termination date. AHA will make no future subsidy payments on behalf of the renter family to the property owner or his/her agent after the Contract is terminated. The owner must reimburse AHA for any rent subsidies paid by AHA for any period after the HAP/Voucher Contract termination date. If the family continues to occupy the unit after the Section 8 HCVP lease
and HAP/Voucher Contract are terminated, the family will be responsible for the full amount of the total monthly contract rent and any other amounts owed as a result of continued occupancy.

If the family has not violated any of the Family Obligations and does not owe any money to AHA, the family must be offered a new Housing Choice Voucher to search for another unit, even if it is within the first term of the lease.

**Family Moves**

Families will be authorized to move with continued assistance unless the family has violated a family obligation or the family owes AHA money under the conditions stated in this Administrative Plan.

A Housing Choice Voucher will be issued when the family provides a Notice of Intent to Vacate to the owner and the AHA. Briefing sessions shall emphasize the family’s responsibility to give the owner and AHA proper written notice of any intent to move. Failure to do so will result in the termination of the family's Section 8 HCVP assistance.

AHA will perform a reexamination of income and household composition even if the last reexamination was conducted less than twelve (12) months ago.

**Housing Choice Voucher Issuance Determinations for Split Households**

**Mutual Consent**

If there is mutual consent of both heads of households, Housing Choice Voucher assistance may be retained by either of the two new family units.

**Court Decision**

AHA will uphold any court decision in regards to which of the two new family units is to retain the housing assistance.

**No Agreement**

AHA will make the determination as to who will continue to receive housing assistance if a family becomes divided due to divorce or legal separation, and the two split households cannot agree as to which family will continue to receive the housing assistance.
Where AHA must make the determination as to which new family unit will retain the housing assistance, the assistance will generally remain with the new household which includes the family member listed as the head of household at the time of the initial issuance of the Housing Choice Voucher. An exception will be made if the circumstances result in the Housing Choice Voucher remaining with a single, non-elderly, non-handicapped individual who would not otherwise have qualified for the Housing Choice Voucher. For these cases, the Housing Choice Voucher will be provided to the portion of the family who qualifies as an eligible family under program rules.

**Remaining Member of Tenant Family**

Where a household receiving Certificate/Voucher assistance separates into more than one household due to legal separation or divorce, assistance will continue for only one of these households. Generally, the assistance will remain with the household with custody of the minor children, unless that head of household is ineligible for Section 8 HCVP assistance.

By definition, live-in aides cannot be considered a remaining member of the family.

Minor children will not be allowed to retain the status of remaining family members unless both parents must leave the household and the Department of Social Services and/or the Juvenile Court has arranged for another adult to be brought into the assisted unit to care for the children. AHA will treat that adult as a visitor for sixty (60) days. After that period, AHA will determine whether court-awarded custody or legal guardianship has been granted to the caretaker. If so, the Certificate/Voucher will be transferred to the caretaker.

If the Court has not awarded custody or legal guardianship, but the action is in process, AHA will secure verification from The Department of Family and Children Services (DFACS) or the Court as to the status. The caretaker will be allowed to remain in the unit, as a visitor, until a determination of custody is made.

The owner/agent must screen and approve the new person(s) living in their unit and acknowledge them as an addition to the lease. AHA will work with the appropriate social service agencies, and the owner/agent to ensure smooth processing of these cases.

Any such new head of household will not be allowed to retain the Voucher should the second household separate again, and that head of household's subsequent family does not include the original children.
CHAPTER 20: DENIAL AND TERMINATION OF ASSISTANCE

The rules and regulations governing the denial or termination of assistance of families in the Section 8 Housing Choice Program are found in 24 CFR 982.552.

Definitions

Drug-Related Criminal Activity

Drug-related criminal activity is the illegal manufacture, sale, distribution, use or possession with intent to manufacture, sell, distribute or use a controlled substance.

Violent Criminal Activity

Violent criminal activity includes a criminal activity that has as one of its elements the use, attempted use, or threatened use of physical force against the person or property of another.

Other Criminal Activity

For purposes of this policy, AHA defines other criminal activity as acts that would be classified as a felony under state or local statute.

Sex Offender

AHA will apply the Department of Justice definition of sex offender, as someone who has been convicted of child molestation, rape, sodomy, or other sex related crimes and is required to register in the area in which they reside.

Pattern of Use or Abuse

For purposes of this policy AHA will define a pattern of use of illegal drugs or pattern of abuse of alcohol as three or more documented instances of illegal drug use or abuse of alcohol within the last two years.
Denial of Assistance-Applicants

It is the policy of the Atlanta Housing Authority to deny assistance to an applicant if:

1. An applicant owes rent or other amounts to AHA or to another PHA in connection with Section 8 or Public Housing assistance under the United States Housing Act of 1937;

2. An applicant or household member (as previous participants in the Section 8 Programs) have not reimbursed AHA, or another housing agency, for any amounts paid to the owner under a HAP Contract for rent or other amounts owed by the family under its lease or for a vacated unit;

3. AHA determines that an applicant has been evicted from federally assisted housing for drug-related criminal activity within the last three years

4. AHA determines that any household member has engaged in drug-related criminal activity within the last three years

5. AHA determines that any household member has engaged in violent criminal activity within the last three years

6. AHA determines that any household member has engaged in other criminal activity within the last year that may threaten the health, safety, or right to peaceful enjoyment of the premises by other residents or persons residing in the immediate vicinity.

7. AHA determines that any household member is currently engaging in the illegal use of a drug

8. AHA has reasonable cause to believe that a household member’s pattern of illegal drug use may threaten the health, safety, or right to peaceful enjoyment of the premises by other residents

9. Any member of the household has ever been convicted of manufacturing or producing methamphetamine on the premises of federally assisted housing

10. AHA determines that the applicant’s abuse of alcohol or pattern of abuse of alcohol may threaten the health, safety, or right to peaceful enjoyment of the premises by other residents.
11. Any member of the household is subject to a lifetime registration requirement under a State sex offender registration program.

12. Any member of the family has committed fraud, bribery, or any other corrupt or criminal act in connection with any Federal housing program.

**Exceptions to Admissions Eligibility Criteria**

AHA may permit admission of persons who have engaged in the illegal use of a controlled substance or abuse of alcohol if the person demonstrates to AHA’s satisfaction that the person is no longer engaging in illegal use of a controlled substance or abuse of alcohol and:

1. Has successfully completed a supervised drug or alcohol rehabilitation program;

2. Has otherwise been rehabilitated successfully; or

3. Is participating in a supervised drug or alcohol rehabilitation program.

**Termination of Assistance- Participants**

A participant family will be terminated from the Section 8 HCVP Program if:

1. AHA determines any household member is currently engaged in any illegal use of a drug, whether or not the household member is convicted

2. AHA determines a pattern of illegal use of a drug by any household member interferes with the health, safety, or right to peaceful enjoyment of the premises by other residents.

3. Any household member has ever been convicted for manufacture or production of methamphetamine on the premises of federally assisted housing

4. AHA determines a household member has engaged in drug-related criminal activity.

5. AHA determines a household member has engaged in any violent criminal activity.
6. The family has been evicted for failure to comply with the terms of the owner’s lease agreement in terms of complying with conditions of probation or parole as imposed under Federal or State law.

7. The family has been evicted by the owner by judicial action for violating the lease by fleeing to avoid prosecution, custody, confinement after conviction, for a crime or attempt to commit a crime that is classified under Georgia State law or the place from which the individual fled.

8. The family has been evicted by the owner for drug-related criminal activity on or off the premises by the participant, any household member, guest, or any other person under the participant’s control.

9. The owner for repeated lease violations has evicted the family.

10. The participant or any household member or any person under the family’s control has engaged in actual or threatened abusive behavior toward any staff or representative of the Atlanta Housing Authority.

A participant family may be terminated from the Section 8 HCVP Program for the following reasons, however the AHA will first attempt to collect the monies owed under a repayment agreement:

1. AHA has determined that the family misrepresented or underreported household information with the intent to commit fraud.

2. AHA determines that the family failed to provide information in a timely manner.

3. The family failed to permit inspection of the unit.

4. The family has failed to pay the full amount of a repayment agreement for a prior special claim.

Standards for Denial/Termination of Assistance

AHA will deny or terminate assistance because of illegal use, or possession for personal use, of a controlled substance, if the use or possession occurred within
the last twelve months proceeding the determination of eligibility for admission or annual reexamination.

Pre-Admission and Annual Reexamination Police Record Checks

AHA has a memorandum of agreement with the Atlanta Police Department to obtain criminal record reports for purposes of making eligibility and continued eligibility determinations for families in the Housing Choice Voucher Program. If the criminal record check results in a negative response requiring the denial or termination of assistance, AHA will provide a copy of the criminal record report to the family and provide the family the opportunity to present evidence to dispute the accuracy and relevancy of the record.

Supporting Evidence

For the purposes of this policy, the following are considered to be sufficient evidence to deny or terminate assistance if:

1. An applicant or participant has been convicted of any felonious violent criminal or felonious drug-related activity within the past sixty- (60) months.

2. An applicant or participant has been arrested for any felonious violent criminal activity or felonious drug-related criminal activity within the past thirty-six (36) months.

3. Other drug use within the past twelve (12) months which did not result in either arrest or conviction, but which can be verified by reliable documentary evidence or sworn statements.

An applicant or participant must provide AHA with all information known to him or her that is relevant to items 1 through 3 above.

Termination of Housing Assistance Payments Contract-Owners

Automatic HAP Contract Termination
A HAP Contract or a Housing Choice Voucher Contract terminates automatically when a family moves from a unit, or when an owner evicts a family.
Grounds for Termination of the HAP Contract

AHA may terminate the HAP Contract if:

1. An owner is not in compliance with the terms of the HAP Contract. (However, before terminating for this reason, AHA in accordance with HUD regulations, must give the owner a thirty (30) day notice and the right to take corrective actions in order to prevent the HAP contract from being terminated.

2. An owner has committed fraud.

3. The AHA terminates assistance to the family.

4. The family is required to move from a unit that is overcrowded.

If AHA decides to terminate the HAP Contract, the owner and family will be given, at least thirty (30) days notice in accordance with HUD regulations.

Supporting Evidence

For the purposes of this policy, the following are considered to be sufficient evidence to deny or terminate assistance if:

1. An applicant or participant has been convicted of any felonious violent criminal or felonious drug-related activity within the past sixty- (60) months.

2. An applicant or participant has been arrested for any felonious violent criminal activity or felonious drug-related criminal activity within the past thirty-six (36) months.

3. An applicant or participant has been convicted for any other felonious criminal activity within the last twenty-four (24) months that threatens the health, safety, or right to peaceful enjoyment of the premises by other residents or by persons residing in the immediate vicinity of the premises.

4. Other drug use within the past twelve (12) months which did not result in either arrest or conviction, but
which can be verified by reliable documentary evidence or sworn statements.

An applicant or participant must provide AHA with all information known to him or her that is relevant to items 1 through 4 above.

**Preponderance of Evidence**

AHA may deny or terminate assistance if the preponderance of evidence indicates that a family member has engaged in such activity, regardless of whether the family member has been arrested or convicted. AHA shall have the discretion to consider all of the circumstances in each case, including the seriousness of the offense, the extent of participation by family members, and the effects that denial or termination would have on family members not involved in the prescribed activity.

**Relevant Evidence to Support Adherence to Policy**

An applicant or participant may also submit other relevant evidence that demonstrates that AHA’s policy regarding drug-related or violent criminal activity has not been violated.

**Other Conditions and Procedures for Termination of Assistance**

**Default of Repayment Agreements**

Participants who default on an executed Repayment Agreement by missing two (2) payments must pay their outstanding balance prior to the issuance of a Housing Choice Voucher or execution of a HAP Contract in a new unit. The family may choose to remain in their current unit with continued assistance.

**Zero HAP for Six Months**

AHA will terminate the assistance for families whose income is sufficient to pay the full gross rent, and 6 months has elapsed since AHA has made a HAP payment.

**Failure to Provide Social Security Numbers and Other Required Release of Information**

AHA will terminate assistance for families whose appropriate members do not provide their social security numbers, and documentation within the time required
and specified by AHA. AHA will terminate assistance if all adult members have not signed HUD Form 9886 within the time period required by AHA.

Failure to Report Changes in Household Income/Composition

If the family did not report an interim change it was required to report, the AHA will determine how much the family owes for previous overpayments AHA made on the family's behalf, plus any amounts owed under other past-due repayment agreements. AHA will not enter into a Repayment Agreement with the family if there was willful misrepresentation to AHA.

Failure to Sign New Lease- Mover Families

If a family moves, and the family or owner do not come into the office to sign a new lease, tenancy addendum and HAP Contract, the housing assistance payments on the new unit will not be issued until all the required documents are signed. AHA will terminate assistance at the previous unit, and the family will be responsible for the full rent in the new unit until all the required documents are executed.

If the family decides not to move into the new unit, and the current owner rescinds the Notice to Vacate or mutual termination of the lease agreement, the family may remain in the current unit with continued assistance. If the family decides to move at a later date, the family will have to provide the owner and AHA with a new Notice to Vacate in accordance with the provisions of the lease.

Welfare-to-Work- Family Obligations

If a Welfare-to-Work family fails to fulfill its obligations under the Welfare-to-Work Rental Voucher program.

Zero Dollar Assistance Tenants ($0)

Six-month Time Limit

Participants who receive no monthly rent assistance (-0$-) from AHA will remain on the program for six (6) months. This six month period will begin the date the family went to zero dollar (-$0-) rent assistance. If the family's TTP meets or exceeds the full gross rent, and six months have elapsed since the last HAP payment was made, the Housing Assistance Payments Contract and the family's participation in the Housing Choice Voucher Program will be terminated.
Rent Increases Resulting in Resumption of HAP

HAP assistance may resume when the owner requests a rent increase during the six (6) month period the unit is still under the HAP Contract and the family not receiving rent assistance. If AHA grants the owner a rent increase, HAP payments could resume based on the increase in rent.

Decrease in Family Income Resulting in Resumption of HAP

If a family reports a decrease in monthly income, Housing Assistance Payments may resume as a result of a decrease in 30% of their monthly-adjusted income.

If it is determined that the family's rent assistance should be resumed, AHA will make an interim adjustment and send a Notice of Change to the owner and participant stating the revised family share of rent and housing assistance payment.

Responsibilities During Zero HAP Period

The family remains a Section 8 HCVP participant during this six- (6) month period and is required to abide by the terms of its lease and the Housing Choice Voucher Program Family Obligations. The HAP Contract remains fully in force, with the exception to of the reduction of the Housing Assistance Payment to zero.

AHA must continue to perform activities such as recertifications and HQS inspections.

The HAP Contract remains fully in force, with the exception to of the reduction of the Housing Assistance Payment to zero, and the owner must perform all duties and responsibilities required, such as compliance with HQS and the lease.

Notification of Pending Termination of Assistance

AHA will notify the family of their right to remain on the program while receiving Zero Dollar (-$0-) rent assistance for a six (6) month period.

If six (6) months go by with no rent assistance payment being paid on the participant's behalf, and the tenant is still at Zero Dollar (-$0-) assistance, the participant and owner must be notified of the imminent termination of the Housing Assistance Payments Contract.

Restriction on Moving to New Units with Zero Assistance

AHA will not enter into any new HAP Contracts during this six (6) month period if the participant is still at Zero Dollar (-$0-) rent assistance. AHA would execute a
new HAP Contract for a new unit if the participant wishes to move to another unit, which would require AHA to pay a portion of the contract, rent.

**Family Misrepresentation**

If a family commits fraud or misrepresentation in connection with the Section 8 HCVP Program, AHA will terminate assistance and cancel the HAP Contract in accordance with HUD rules and regulations if it is determined that the family acted with the intent to defraud the program.

If the family misrepresented income, assets, or allowances and deductions, which would have caused them to pay more, AHA will make every effort to recover any overpayment made as a result of tenant fraud or abuse.

**Owner Misrepresentation**

If the landlord has committed fraud or misrepresentation in connection with the Section 8 HCVP Program, AHA will terminate the HAP Contract if it is determined that the owner acted with the intent to defraud the program.

AHA will review the family’s involvement to determine if the family is eligible to continue to receive assistance in another unit. AHA will make every effort to recover any overpayments made as a result of landlord fraud or abuse.

AHA may restrict the owner from future participation in the program for a reasonable period of time, commensurate with the seriousness of the offense.

**Notification of Termination of Assistance**

In any case where AHA decides to terminate assistance to the family, AHA must give both the family and the owner a thirty (30) day written termination notice which states:

1. The reason(s) for the termination
2. The effective date of the termination
3. The family's right to request an Informal Hearing to be held before termination of assistance, and
4. The family's responsibility to pay the full rent to the owner if the family remains in their current unit.
CHAPTER 21: COMPLAINTS AND APPEALS
INFORMAL REVIEWS AND HEARINGS

General Policy for Handling Complaints

AHA staff shall respond in a prompt, professional, and confidential manner to complaints received from families or owners. If the complaint involves potential fraud or program abuse, the AHA will require the complainant to put the complaint in writing and direct it to the Assistant Director for Administration. Anonymous written complaints will be accepted, if adequate information is presented to conduct a review.

Participants, who notify the AHA that their unit does not meet HQS requirements, must provide written documentation that the deficiencies were reported to the owner prior to requesting an inspection. If the participant wishes to report an urgent or emergency condition as defined previously in this Administrative Plan, written documentation of prior notice to the owner is not required.

Appeals by Owners

Appeals by owners are requests for an administrative review of a decision made by AHA. The process for appealing an AHA decision must be made in the following order:

1. A meeting with the Section 8 HCVP Supervisor who made the initial decision.

2. If the owner is not satisfied with the Supervisor’s decision, the owner may schedule a meeting with the Assistant Director of Administration of the Section 8 HCVP Program to resolve the matter.

3. If the owner remains unsatisfied with the Assistant Director’s decision, the owner may file a written request for a final review of AHA’s decision by the Deputy Executive Director of the Housing Choice Program.
Due to the Federal Privacy Act, AHA has no obligation to discuss any housing assistance terminations with an owner when the reason(s) for termination are due to a tenant's noncompliance with the family's obligation as set forth in 24 C.F.R. 982.551.

**Informal Meetings- Failure to Verify Preference Claimed**

If AHA denies assistance to a family due to the family's inability to verify a preference, AHA will notify the applicant in writing of the reasons for the determination and offer the applicant an opportunity to review the determination. Applicants must submit a written request for an informal meeting within 10 business days from the date of the Notice. If a meeting is requested to review the determination, AHA will designate an employee or officer of AHA to meet with the applicant. The person designated will not be the person who made the decision or a subordinate of that person. The person who made the decision may be asked to participate in the meeting.

**Informal Reviews- Applicants**

The “Informal Review” process applies only to applicants. Applicants include Housing Choice Voucher holders who have requested lease approval but have not been authorized by AHA to sign the lease, or AHA has not yet signed a HAP Contract with the owner under the Housing Choice Voucher Program. If an applicant is ineligible for or must be denied assistance, AHA will send a Notice of Ineligibility or Denial of Assistance. The Notice includes:

1. The applicant’s right to an informal review
2. The timeframe for requesting a informal review
3. The requirement to put the informal review request in writing
4. An explanation that the applicant may bring oral or written evidence to support his/her claim and that the applicant may choose to have representation or legal counsel at his/her own expense

In accordance with HUD regulations, AHA will provide applicants with the opportunity for an informal review of decisions for the following reasons:

1. Denial of Waiting List Placement
2. Denial of Assistance for failure to verify preference(s) claimed
3. Denial of Issuance of a Section 8 Housing Choice Voucher
4. Notification of Ineligibility

Informal reviews are not required for discretionary administrative determinations by AHA that involve:
1. General policy issues
2. Class grievances
3. Determinations of the number of bedrooms for the Voucher
4. Refusal to extend a Voucher
5. Rejection of a unit that does not meet housing quality standards
6. Disapproval of an owner's form of lease or lease addendum

The request for an Informal Review must be made in writing within 10 business days from the date of the Notice of Ineligibility or Denial of Assistance.

Informal Review Officer

The Informal Review shall be conducted by a person appointed by AHA who is neither the person who made or approved of the decision under review nor the subordinate of such person.

Informal Review Proceedings

In accordance with HUD regulations, both AHA and the applicant will have the opportunity to present evidence and present and question witnesses.

Notification of Informal Review Decisions

A Notice of the Informal Review Decision shall be provided in writing to the applicant within fifteen (15) working days after the Informal Review. The Notice will provide a summary of the decision and reasons for the decision and state the effective date of the decision.

Documentation

Requests for Informal Reviews, supporting documentation, and a copy of the final decision are retained in the applicant's file.

Informal Hearings-Participants

The “Informal Hearing” process applies only to program participants. Participants are families who have an effective lease and HAP Contract, and are currently participating in the Housing Choice Voucher Program.

If it is determined that a family’s assistance should be terminated, AHA will send the family a Notice of Termination of Assistance. The Notice includes:

1. The reason for the termination of assistance
2. The participant’s right to an informal hearing
3. The timeframe for requesting an informal hearing
4. The requirement to put the informal hearing request in writing
5. An explanation that the participant may bring oral or written evidence to support his/her right to continue receiving assistance and that the participant may choose to have representation or legal counsel at his/her own expense

In accordance with HUD regulations, AHA must provide the opportunity for an informal hearing on decisions on:

1. Calculations of the Total Tenant Payment
2. Denial or Termination of Assistance
3. Determinations that the family is overhoused and the family is denied an exception to the subsidy standards
4. Determination of bedroom size on the Housing Voucher for those families moving to a new unit with continued participation

Informal Hearings are not required to review:

1. Discretionary administrative determinations
2. General policy issues or class grievances
3. Determinations that a unit does not meet HQS or that a unit is not decent, safe and sanitary because of an increase in family size or change in composition
4. Decisions related to remedies against the owner under the HAP Contract including terminations of HAP payments
5. Decisions to not extend the term of a Voucher of a family that wants to move.

AHA will conduct the informal hearing prior to termination of HAP assistance.

Informal Hearing Officer

The Informal Hearing shall be conducted by a Hearing Officer appointed by the AHA who is neither the person who made or approved of the decision under review nor a subordinate of such person.

Informal Hearing Proceedings

The Hearing Officer will conduct the Informal Hearing. Both AHA and the family must have the opportunity to present evidence and present and question witnesses. The Hearing Officer will make a determination on how the rule or regulation is applied to the information submitted at the Informal Hearing.
Informal Hearing Decision

A Notice of Informal Hearing Decision shall be provided in writing to the participant with a copy to the participant within fifteen (15) working days of the Informal Hearing. The Notice will provide a summary of the decision and reasons for the decision; state the amount of money owed, if applicable, and state the effective date of the final decision.

Documentation

The request for an Informal Hearing, supporting documentation, and a copy of the final decision will be retained in the family’s file.

Requests for Informal Meeting, Review, or Hearing

Requests for an Informal Meeting, Review or Hearing may be mailed or received by the AHA Section 8 HCVP receptionist.

Actions Prior to Informal Review or Hearing

AHA will conduct informal hearing(s) prior to termination of HAP assistance. However, AHA may take the following action prior to the Informal Review or Hearing.

1. Change the TTP (not including changes in AHA’s Utility Allowance Schedule)
2. Deny a Housing Choice Voucher for a family that wants to move
3. Determine that a family is residing in a unit with a larger number of bedrooms than appropriate under the subsidy standards
4. Deny an exception to the subsidy standards
5. Determine the number of bedrooms on a Housing Choice Voucher

Scheduling of Informal Reviews/Hearings

Families will be notified of the Informal Review or Hearing in writing within fifteen (15) days of the receipt of the request for Informal Review or Hearing. The notice will specify the date, time, and place; procedures governing the Informal Review or Informal Hearing; and the contact person and phone number to be used to reschedule the review or hearing.
If the time is not convenient, the rescheduled date must be within one week of the time originally scheduled, unless the family can prove that they were previously scheduled to be out of town within that period or had a prior commitment.

After an Informal Review or Informal Hearing date is established, the family may request to reschedule or continue the hearing upon showing "good cause." Good cause is defined as an unavoidable conflict in the meeting time with another agency, doctor, or company that seriously affects the health, safety or welfare of the family.

If the family does not appear at the scheduled informal review and hearing time but notifies AHA within 48 hours (excluding weekends) of the need to reschedule an Informal Review or Informal Hearing, AHA will reschedule the Informal Review or Informal Hearing only upon a showing of good cause. The Informal Review or Informal Hearing will be rescheduled, in this event, only one time.

**Family Preparation for Informal Review/Hearing**

Families have the right to examine the contents of their file related to the information which will serve as the basis for the Informal Review or Informal Hearing and on which a final decision will be based. Families may also present any or all information pertinent to the issue of the Informal Review or Informal Hearing and request that HCVP staff be available or present to answer questions pertinent to the case. As mentioned previously, families may be represented by legal counsel or other designated representative at their own expense.

**AHA Preparation for Informal Review/Hearing**

In addition to the other requirements contained in this Chapter, AHA reserves the right to present evidence, and any and all information pertinent to the issue of the Informal Review or Informal Hearing; be notified if the family intends to be represented by legal counsel or another party; have its attorney present; and have the staff person familiar with the case present.

**Information Pertinent to the Decision**

The Informal Review or Informal Hearing shall concern only the issues pending a decision. Families will receive a written summary of the decision and reasons for the decision; state the amount of money owed, if applicable, and state the effective date of the decision.
Non-Binding Decisions

AHA is not bound by hearing decisions concerning matters in which AHA is not required to provide an opportunity for an Informal Review or Informal Hearing; decisions which may be contrary to HUD regulations or requirements; or other Federal, State or local laws; or in circumstances where the decision exceeded the authority of the person conducting the hearing.

AHA shall send a letter to the applicant/participant if it determines AHA is not bound by the Hearing Officer’s determination within ten (10) calendar days of the Informal Hearing or Informal Review. The letter shall include AHA’s reasons for the decision.

Reasonable Accommodation

AHA is committed to making certain all citizens have equal opportunity for participation in housing programs.

As such, the policies stated above will be subordinate to a test of reasonable accommodation to comply with Section 504 of the Rehabilitation Act of 1973 (Section 504) and the Americans with Disabilities Act of 1990 (ADA).
CHAPTER 22: REPAYMENT AGREEMENTS

Notice of Debts Owed

If a family owes money to the AHA, the AHA will send a written notification stating the amount of monies owed, how the amount was determined, and the consequences of having an unpaid debt to the agency.

Monies owed could be the result of claims paid on behalf of a family by AHA to a former landlord, unpaid rent or other charges from public housing, or unreported or underreported information which affected the amount of assistance provided.

In order to keep families in good standing with the Housing Choice Program, AHA will strive to enter into repayment agreements in accordance with the following policy.

Unpaid Rent or Other Charges from Public Housing

It is AHA’s policy to require former public housing residents to pay in full all monies owed under the public housing program, prior to receiving assistance under the Housing Choice Voucher Program. Families, who leave public housing owing money, may not be placed on the Housing Choice Waiting List unless they are current on a Repayment Agreement. All former monies owed must be paid in full prior to selection from the Housing Choice Waiting List.

Repayment Agreement for Prior Claims

Applicants

If AHA paid a special claim to an owner on behalf of a family and that family wants to reapply to the waiting list, the family must enter into a Repayment Agreement and make timely payments in order to be placed on the waiting list. Furthermore, the Repayment Agreement must be satisfied in full prior to receiving the Housing Choice Voucher.

Participants

If AHA paid a special claim to an owner on behalf of a family and that family wants to relocate with housing assistance, the family must enter into a
Repayment Agreement and make timely payments in order to receive a housing voucher.

The maximum amount of a Repayment Agreement for special claims is Two Thousand Five Hundred Dollars ($2,500). If the amount owed is more than Two Thousand Five Hundred Dollars ($2,500), AHA will require the family to pay in full the amount owed in excess of Two Thousand Five Hundred Dollars ($2,500), plus the initial deposit, and subsequently enter into a Repayment Agreement for the difference.

The terms of AHA’s Repayment Agreements are established according to the following chart:

<table>
<thead>
<tr>
<th>Amount Owed</th>
<th>Initial Payment</th>
<th># of months to repay</th>
</tr>
</thead>
<tbody>
<tr>
<td>$500 or less</td>
<td>50% of amount owed</td>
<td>3-6 months</td>
</tr>
<tr>
<td>$501-$1000</td>
<td>25% of amount owed</td>
<td>10 months</td>
</tr>
<tr>
<td>$1001-$2500</td>
<td>20% of amount owed</td>
<td>12 months</td>
</tr>
</tbody>
</table>

**Failure to Accurately Report Household Income/Composition**

AHA will determine whether or not the family intended to commit fraud or violated a Family Obligation prior to offering a Repayment Agreement for false or unreported information. The decision will be made based on a review of the case and information presented at an informal hearing.

**Intent to Defraud**

If AHA determined at the informal hearing that the family committed willful and intentional fraud, AHA will require the family to repay the entire amount in full or have its assistance terminated, since willful intent to defraud is a violation of a Family Obligation.

If the family’s assistance is terminated and repayment has not been made, the Housing Choice staff will refer the amount to the AHA Finance Department for collections.

**Errors/Omissions Without Intent to Defraud**

If the family did not supply complete or accurate information to make a correct determination of the family’s subsidy, but AHA determined that the family did not act with intention to defraud, AHA will enter into a Repayment Agreement with the family. However, if the amount owed is in excess of $5000, any amount in excess of $5000 will have to be paid in full prior to the execution of the Repayment Agreement.
AHA will set up monthly payments on the Repayment Agreement according to the following terms:

<table>
<thead>
<tr>
<th>Amount Owed</th>
<th>Initial Payment</th>
<th>Monthly Payment</th>
</tr>
</thead>
<tbody>
<tr>
<td>Less than $5000</td>
<td>25% of amount owed</td>
<td>10% of monthly adjusted income</td>
</tr>
<tr>
<td>More than $5000</td>
<td>Amount owed in excess of $5000, plus 25% for initial payment</td>
<td>10% of monthly adjusted income</td>
</tr>
</tbody>
</table>

**Failure to Report Interim Changes**

AHA requires Housing Choice Program applicants to report all changes in household income and composition from final eligibility up to the execution of the HAP Contract. Program participants are required to report all changes in household income and composition to their housing advisor when they occur. AHA will advise program participants as to whether the change will require an interim review of the family’s share of the rent.

If at a later examination AHA determines that the family failed to report a change in their household income or family composition, AHA calculate the correct amount of subsidy the family should have received and enter into a Repayment Agreements with the family.

**Refusal to Enter into Repayment Agreement-Failure to Report Information**

If at any time the family refuses to enter into a Repayment Agreement, for failure to report complete and accurate family information, AHA will terminate the assistance for fraud. The family will be given an opportunity for an Informal Hearing prior to the termination of assistance.

AHA may also consider referring the case for local prosecution for any amount up to Ten Thousand Dollars ($10,000). If the amount is Ten Thousand Dollars ($10,000) or more, AHA will forward the case to the Regional Inspector General for investigation.

If the family's assistance is terminated and repayment has not been made, the Housing Choice staff will refer the amount to the AHA Finance Department for collection.
Breaches of Repayment Agreements

Claims/Debts-Prior to Execution of HAP Contract

AHA may deny/terminate assistance to the family for the breach of a Repayment Agreement, if the family

1. Is in final eligibility processing or in the eligibility pool
2. Has been issued a voucher
3. Is awaiting approval of a proposed lease or execution of a HAP Contract.

Claims/Debts-After HAP Contract Is Executed

If a family who is currently receiving assistance under a HAP contract enters into a Repayment Agreement, and fails to make timely payments, AHA will require the family to make all missed payments prior to issuance of a Voucher to move to another unit.

Failure to Report Family Information

If a family breaches a Repayment Agreement for underreported income, their housing assistance will be terminated for violation of the Family Obligations to provide complete and accurate information in the reporting of household income and composition.

Legal Action

AHA may initiate legal action, including but not limited to a civil proceeding and garnishment in order to collect outstanding debts.

Incorrect Payments to Owner

If the AHA determines that an owner has received payments that he/she was not entitled to, AHA will first request that the owner repay/return the amount that was incorrectly paid.

If the owner does not reimburse the AHA in the timeframe specified, AHA will reclaim the HAP payments from future HAP payments to the owner. If the future HAP payments owed are insufficient to reclaim the amount owed, the additional amount will be referred to the Finance Department for collection.
Owner Fraud and Program Abuse

If the AHA determines that the owner obtained or retained payments in an attempt to defraud the Housing Choice Program, AHA will take action as directed in HUD regulations and handbooks, and refer cases for local prosecution or to the Inspector General, as appropriate.
AHA has received the Moving to Work designation from HUD and this page is reserved for the administrative policies that impact the Housing Choice Programs.
CHAPTER 24: HOUSING SEARCH ASSISTANCE PROGRAM

AHA has applied for funding under the Housing Search Assistance Program and this section is reserved for the administrative policies related to the Housing Choice Program.
CHAPTER 25: SHARED HOUSING PROGRAM

General Purpose

24 C.F.R. 982.615 defines "Shared Housing" as a housing unit where an assisted family shares a units with other resident or residents of the unit. The unit may be a house or an apartment. Other assisted or unassisted residents may reside in the unit.

The AHA has determined that a Shared Housing component would benefit persons with disabilities and elderly persons 62 years of age and older. Typically, individuals who fall into one of these categories can benefit from a shared housing arrangement due to the availability of attendant care within the unit, and the assistance afforded them in other areas such as transportation, shopping and housekeeping.

Applicability

24 CFR 982.615 contains special requirements and procedures for Shared Housing in the Section 8 Housing Choice Voucher programs. The AHA adheres to all HUD rules and regulations regarding the operation of a Shared Housing program. Except as modified by this Chapter 25, the requirements of this Plan relating to the Administration and operation of Section 8 Housing Choice Voucher Program apply to Shared Housing.

Eligible Families

Elderly and Disabled families who meet the eligibility for admission requirements stated in this Administrative Plan are eligible to participate in the Shared Housing program.

24 C.F.R. 5.403 defines "Elderly Family" as a family whose head or spouse (or sole member) is a person who is at least 62 years of age. It may include two or more persons who are at least 62 years of age living together, or one or more persons who are at least 62 years of age living with one or more live-in aides.

Also defined in 24 CVR 5. 403, a “Disabled Family” is a family whose head, spouse, or sole member is a person with disabilities. It may include two or more
persons with disabilities living together or one or more persons with disabilities living with one or more live-in aides.

**Type of Allowable Shared Housing**

In accordance with 24 C.F.R. 982.616, AHA will define Shared Housing where an individual lease and separate HAP Contract is executed for each assisted family residing in the shared housing unit.

**Occupancy of a Shared Housing Unit**

The AHA will adhere to the HUD occupancy requirements for Shared Housing at 24 C.F.R. 982.615 The number of bedrooms an assisted family may lease under a Shared Housing arrangement shall be determined in accordance with the subsidy standards established in this Administrative Plan.

**Rent to Owner**

The Rent to Owner and housing assistance payment shall be determined in accordance with 24 CFR 982.617.

**Housing Quality Standards**

In accordance with 24 CFR 982.618, AHA’s Shared Housing unit will satisfy housing quality standards prior to the commencement of housing assistance. The AHA will not approve a Lease or execute a HAP Contract for Shared Housing unless the structure in which the Shared Housing unit is located, and the portion of the structure available for use by the assisted Family under its Lease, meet the housing quality standards of 24 CFR 982.401. The Shared Housing unit and the structure in which it is located must meet any additional criteria adopted by AHA as policies with respect to housing quality standards established within this Administrative Plan.

**Approval**

All requests for Shared Housing must be submitted to the Deputy Executive Director for Special Housing and Homeownership, or his designee, for review and approval prior to the approval of the Lease and execution of the HAP contract for Shared Housing unit.
As identified earlier in Chapter 7 of this Administrative Plan, AHA administers tenant-based assistance for three programs that were designed to address specific needs. These programs are:

♦ Mainstreaming Persons with Disabilities
♦ Family Unification
♦ Welfare to Work

As mention in previous chapters, applicants who qualify for these programs may be selected from the waiting list prior to other applicants, under a Special Admissions Policy. The following describes additional AHA policies that relate to these programs.

**Mainstreaming Persons with Disabilities**

Persons with disabilities may apply for assistance under this program at the time AHA solicits applications. It is the policy of the AHA to verify the disability status of the applicant at the time of selection from the waiting list.

If the family was already on the waiting list, at the time of the solicitation for Mainstreaming Persons with Disabilities, the family will retain their original lottery ranking with a special designation for the Mainstreaming Persons with Disabilities program.

If the family was not on the waiting list, the family will be provided a random, lottery number for the Mainstreaming persons with Disabilities designation.

To ensure successful participation in the program, Mainstream participants are linked to advocates and service providers in the community who follow-up with the families on a regular basis.

AHA provides reasonable accommodation to families in this program to ensure full participation and access to program information and services.
Family Unification

Applicants are referred to AHA from the Fulton County Department of Family and Children Services. It is the policy of AHA to review the referrals to ensure that the applicants qualify under the program regulations.

Referrals are taken on an ongoing basis and applicants can be added to the waiting list at any time. If the family is already on the waiting list they will retain their original waiting list status and be given a designation for the Family Unification Program. The Family Unification waiting list is maintained separately from the original waiting list since the FUP waiting list is based on date of referral, and not a lottery number.

Welfare to Work

To fill slots for the Welfare to Work program, AHA coordinates with the Fulton County Department of Family and Children Services, to identify current waiting list applicants receiving TANF for the Welfare to Work program. If there are not enough applicants on the current waiting list for the number of Welfare to Work slots available, the AHA will solicit applications for this program.

It is the policy of the AHA to refer all Welfare to Work participants to the Family Self-Sufficiency Program to develop an individual training and services plan in order to achieve self-sufficiency. Welfare to Work participants must attend required workshops and meet job training and employment requirements in order to continue receiving housing assistance.

It is the policy of the AHA to monitor compliance with the Welfare to Work requirements on a monthly basis during the first 90 days of employment. Following the initial 90-day period of employment, Welfare to Work participants meet on a quarterly basis with AHA staff. Following sustained success in maintaining employment, Welfare to Work participants are required to come into the AHA office annually to complete an annual reexamination of income and household composition.
CHAPTER 27: PROJECT- BASED ASSISTANCE

Purpose

The United States Housing Act of 1937, (as amended the “Act”) directs HUD to permit Housing Agencies to "attach to structures" up to twenty percent (20%) of the Housing Choice assistance provided by the Housing Agency.

Within this twenty percent (20%) limit, AHA may attach Housing Choice Project-Based Assistance (PBA) to a structure where the owner agrees to construct or rehabilitate the structure other than with assistance provided under the Act. Recent Amendments to the Act also allow PBA to be attached to existing structures. The purpose of the PBA Program is to encourage property owners to construct standard rental housing, upgrade substandard rental housing stock, and make additional housing available to low-income families at affordable rents.

AHA will strategically utilize PBA to improve the quantity and quality of affordable housing in the metropolitan Atlanta area. AHA has determined that this is a useful strategy because the number and quality of affordable units available to participants in the Housing Choice Voucher Programs are inadequate to meet the demand for affordable housing in the area. Current utilization rates and fair market rents do not provide low, very low and extremely low income families with adequate housing choice. This strategy is consistent with AHA’s Plan and Amended and Restated Five-Year Plan because it will expand, improve and diversify the resources available for housing low, very low and extremely low income families, including the elderly and disabled. PBA will also facilitate additional housing choice for public housing assisted families who are relocated to support the modernization or revitalization of AHA communities. AHA reserves the right to request an exception to the requirement that all PBA be attached to units in census tracks with poverty rates of less than twenty percent (20%) when AHA determines that PBA opportunity expands affordable housing choice for eligible families or contributes to the revitalization of a local neighborhood or community.

Definition

For the purpose of this program "Project-Based Assistance" (PBA) shall be defined as follows: Housing Assistance attached to a dwelling unit where the Owner has agreed to construct standard housing, or to rehabilitate substandard rental housing stock (in accordance with the conditions listed in 1 or 2 below), or
to provide existing housing and make such housing available to low-income families at affordable rents.

Rehabilitation of substandard rental housing stock requires that:

1. There is an expenditure of a minimum of $1,000 per dwelling unit, which can include the prorated share (for multi-unit projects) of common area or systems improvements, in order to:
   a. Upgrade the property to decent, safe and sanitary conditions to comply with Housing Quality Standards (HQS);
   b. Repair or replace major building systems or components in danger of failure;
   c. Make improvements to the property essential to permit use of the property by handicapped persons; or
   d. Merge or convert units to provide housing for large families.

2. Funds for rehabilitation must be obtained from sources other than those provided under the Act.

Reference

1. United States Housing Act of 1937, Section 8(d)(2)
2. 24 C.F.R. Part 882, Subpart G
3. HUD Handbook 7420.3
4. HUD Handbook 7420.7
5. Agreement to Enter Into Housing Assistance Payment Contract HUD-52531A (Agreement)
6. Housing Assistance Payments Contract - HUD 52530A (HAP)
8. Federal Register Notice, Tuesday, January 16, 2001 (and subsequent rules and regulations when released)
Outreach to Owners

1. AHA will notify all current Section 8 Owners and the developer community in the Metro-Atlanta area of the PBA Program. The notice will give general information as well as instructions on how to request additional information. AHA may hold forums to inform Section 8 Owners and the developer community in the Metro-Atlanta area to inform such persons about the PBA Program.

2. AHA will publish in the Atlanta Journal/Constitution, local minority publications and local business publications, notification of the Request for Proposals (RFP) for the PBA Program. The contents of the notice will comply with applicable HUD requirements and AHA’s Plan and Restated Five-Year Plan.

3. Advertisements will run once a week for a minimum of three consecutive weeks in the publications specified above.

4. Notices to owners and publications of the RFP will include any specific unit, allocation or purpose for the allocation. For example, a development of elderly, instead of family units, would require clarification in all publications.

5. If AHA does not receive sufficient responses to the Request for Proposals, AHA may negotiate directly with Owners or Developers to obtain proposals that meet program requirements.

Location of Eligible Properties

All properties must comply with applicable Federal requirements regarding site and neighborhood standards, as amended from time to time, unless waived or approved by HUD.

Developers of PBA communities are reminded that it is a goal of the AHA to recreate stable low income housing communities that not only provide decent shelter, but also provide social and economic opportunities for residents. The units proposed for this program shall be located in areas, which provide a wholesome living environment. Emphasis shall also be placed on durable construction, economy of maintenance, energy conservation and suitable recreation space.
Waiting List

The waiting list will be organized in accordance with HUD regulations and the provisions outlined in this Administrative Plan. Families interested in receiving assistance in an approved PBA community will be clearly identified on the waiting list.

Former Residents of Perry Homes and Carver Homes

Former AHA public housing residents at the Perry Homes and Carver Homes communities that were displaced by AHA public housing demolition, disposition, and redevelopment activities may choose to exchange their current Housing Choice Voucher for an opportunity to live in a PBA unit at their respective project-based replacement housing community upon initial lease-up. In addition, former AHA public housing residents at the Perry Homes and Carver Homes communities that were displaced by AHA public housing demolition, disposition, and redevelopment activities, and currently reside in interim housing, including housing within the revitalized community, may request the issuance of a relocation / replacement voucher to exchange for an opportunity to live in a PBA unit at their respective project-based replacement housing community upon initial lease-up. Displaced families from Perry Homes and Carver Homes have this option, regardless of their presence, absence, or placement on the waiting list for the first available, appropriately sized, PBA unit, so long as the family meets the criteria (i.e. elderly, disabled, family, etc.) of PBA offered at the approved project-based community.

Current Waiting List Applicants

Qualified applicants on the current Housing Choice waiting list will be notified to determine their interest in the PBA program. If the family indicates that they are interested in living in one of the approved project-based communities, their applicant record will be flagged for the PBA program. As units become available in the PBA program, the next applicant who expressed interest in the PBA community will be selected from the waiting list for final eligibility processing based on preference and lottery ranking. It is the policy of AHA to rank by lottery all pre-applications to the waiting list and not make any determination on an applicant’s apparent eligibility until the family is selected from the waiting list and completes a full application.

At any time on the waiting list current qualified applicants may express their interest in receiving assistance in a PBA unit and have their applicant record updated.
Future Waiting List Applicants

Future applicants will have the opportunity to apply for all forms of assistance including PBA, as long as the waiting list is open.

Waiting List Selections and Organization

Selection from the PBA waiting list will be made without regard to race, color, sex, religion, creed, national or ethnic origin, age, family or marital status, ancestry, place of birth, sexual preference, handicap, disability, family size, or source or amount of income.

The waiting list will be maintained and organized in accordance with HUD regulations and the provisions outlined in this Administrative Plan. Preferences as set forth in Chapter 7 of this Plan, entitled Selection from the Waiting List, apply equally to waiting list selections for the PBA program.

Pre-Submission Conference

A pre-submission conference may be held by AHA to present an opportunity for prospective owners/developers to raise written or oral questions or comments regarding the contents and structure of the RFP. The location of the meeting will be specified in the public advertisement. Additional conferences may be held as needed to allow for the widest possible participation in the solicitation.

Proposal Submission Requirements

The following material must be included in submissions by Developers in response to the RFP (failure to provide the required material at the time of submission will result in the rejection of the proposal as non-responsive):

Description

A. For new construction projects, a description of the housing to be constructed, including the number of units by size (square footage), bedroom count, bathroom count, schematics of the proposed new construction, unit plans, listing of amenities and services, estimated cost of construction estimated date of completion. A completed (in-as-far as possible) Site, Design and Cost Report (HUD-52651-A), to be submitted as well as a completed Outline Specification (HUD-5087).

The schematics shall contain the following (no other material will be accepted):
• Identification and description of proposed site;
• Site and neighborhood plan;
• Floor plan of typical unit(s); and
• Elevation(s).

The application should contain a written description of the Project as envisioned by the architect. Special emphasis should be placed on crime prevention through environmental design. The design architect must submit a certification that the working drawings and specifications and proposed construction comply with HUD Housing Quality Standards (HQS), local codes and ordinances, and all zoning requirements.

B. For rehabilitation projects, a description of the as-is condition of the property, including photographs of the HQS deficiencies, a work write-up and a cost estimate must be included in the application. The description of the proposed rehabilitation project must include the following:

• Major systems and common elements to be repaired / replaced;
• Anticipated improvements to individual units (attach floor plan for typical units by bedroom size;
• Total estimated cost;
• Sketches of the rehabilitation or construction; and
• Evidence of zoning compliance; and estimated time for completion.

Rents

The HAP Contract (or Agreement to Enter into a HAP Contract) shall establish gross rents (i.e. rents to owner plus the applicable allowance for tenant-paid utilities) that do not exceed one hundred ten percent (110%) of the established Fair Market Rent (FMR), for the area where the housing is located.

If a unit has been allocated a low-income housing tax credit under the Internal Revenue Code of 1986, as amended, but is not located in a “qualified census tract”, as defined in the law, the rent to owner may be established at any level that does not exceed the rent charged for comparable units in the same building that receive the tax credit but do not have additional rental assistance.

Within the limitation mentioned above, the initial rent to the owner may differ from payment standard amounts in the payment standard schedule adopted for AHA’s tenant-based voucher program. However, just as in the tenant-based program and the project-based certificate program under prior law, the initial and adjusted rent to owner must be reasonable in relation to rents charged in the private market for comparable unassisted units.

The HAP Contract between AHA and the owner must provide for adjustments of rent to owner during the contract term and the adjusted rents must be reasonable...
in comparison with rents charged for comparable units in the private, unassisted local market. The statutory maximum rent limits apply both to the establishment of the initial rent to owner at the beginning of the HAP Contract term, and to adjustments of rent to owner during the HAP Contract term.

The proposal should also include a completed Project Pro-Forma and Operating Pro-Forma based upon the proposed contract rents.

**Identity**

The identity of the owner, developer, builder, architect, management agent (and other participants) and the names of officers and principal members, shareholder, investors, and other parties having a substantial interest; the previous participation of each in HUD programs on the prescribed HUD form (HUD-2530, Previous Participation Certification); and a disclosure of any possible conflict of interest by any of these parties that would be a violation of the Agreement or the Contract; and information on the qualifications and experience of the principal participants. Information concerning any participant who is not known at the time of the Developer's submission must be provided to AHA as soon as the participant is known.

Past professional and technical achievements of the principals, and the size, diversification and overall experience of the firm should be emphasized.

The Owner/Developer must provide a written certification showing that the above mentioned parties are not on the U.S. General Services Administration list of parties excluded from Federal procurement and non-procurement programs.

**Identification of Tenants by Unit**

For projects involving rehabilitation or currently existing construction, attach a list of the units by unit address and number of bedrooms proposed for assistance, providing the following information as of the date of submission of the application.

- Whether vacant or occupied;
- Current monthly rent and deposits collected; and
- Tenant's name.

**Management Plan**

The Developer's plan for managing, marketing and maintaining the units during the term of the contract. Provide a description of any previous experience in residential management, especially of low-income housing (projects of more than 4 units) should be included. The developer's proposed Tenant Selection Criteria must be included in the proposal.
Tax Credits and Evidence of Financing

Evidence of financing commitments or lender interest and the proposed terms of financing must be included. Disclosure of all other forms of local, state or federal government assistance must be provided.

Contract Term

The HAP Contract between AHA and the owner may be for a term of up to ten (10) years, although payments under the contract are subject to the future availability of appropriations and future availability of funding under the ACC. Extension of the contract term: The HAP Contract for such period as AHA determines appropriate to achieve long-term affordability of the housing or to expand housing opportunities. All HAP Contract extensions, however, must be contingent upon the future availability of appropriated funds.

Experience of Developer

Demonstrated past success(es) in the operation or development of low-income housing similar to this project must be stated. References should also be included.

Financial Responsibility

Provide evidence of the Developer's financial responsibility. Include the firm's or individual's ability to devote financial resources (e.g. capitalization, bonding capability, credit rating, and years in business).

Minority Participation

Describe the extent of minority participation in the Project, including extent of minority ownership of the firm, a participation plan for minority subcontractors, resident involvement and job recruitment.

Site Control

Provide evidence of site control; evidence that the proposed new construction or rehabilitation is permitted under current zoning or evidence to indicate that the needed zoning is likely and will not delay the project; description, map (and/or survey) of the proposed site(s) addressing dimensions, exposure and contours and availability of utilities (water, sewer, gas, electricity, streets); description and/or map(s) demonstrating accessibility to social, recreation, educational, commercial, and health facilities and services as well as proximity and availability of public transportation to places of employment providing a range of jobs for lower income workers.
Section 3 Documentation

A completed “Section 3 Business Self-Certification Form” and “Section 3 Plan Form”, must be submitted with the proposal.

Evidence of Local Government Approval/Support

Evidence of local government approval and support, as well as community and neighborhood support should be submitted, if possible.

Relocation

If relocation and/or displacement of persons is anticipated, the Owner/Developer must provide a written statement identifying (a) the number of persons to be displaced, temporarily relocated, or moved permanently within the building or complex; (b) the estimated cost of relocation payments and services, and the source(s) of funding; and the organization that will carry out the relocation activities.

Owners/Developers must comply with HUD requirements at 24 CFR 983.10.

Project Based Assistance Selection Criteria

All properties will be rated and ranked in accordance with AHA's Project Based Selection Criteria included in this Administrative Plan. Points are assigned based on important project characteristics, including the financing commitment, owner's management capability, owner's rehabilitation or new construction capability, number of units in the project, social service resources, relocation requirements, and overall feasibility.

AHA will not limit the number of proposals that a single individual, corporation or nonprofit entity will be allowed to submit. However, in reviewing, rating and ranking proposals, AHA will carefully consider the applicant’s capacity to undertake and complete the project within the particular time period. In some cases, it may be very important that AHA consider "as a whole" a proposal that includes several units or properties that may or may not be contiguous. In determining the applicant's capacity to manage the rehabilitation or construction process (whether it be few or many units) AHA will consider the scope and cost of the project, the adequacy of financial support, and the applicant's success or difficulties with previous housing programs.

The Review Committee shall determine qualifications, interest, and availability by reviewing all written responses received that express an interest in performing the project, and when deemed necessary, by conducting formal interviews of selected respondents who are determined to be best qualified based upon the evaluation of written responses. In addition, AHA reserves the right to visit
proposed sites, verify information submitted in proposals and contact applicants to clarify information provided.

Applications for ineligible units will be disapproved and not ranked or selected. Owners will be advised in writing of any ineligible submissions.

Proposals shall be evaluated, scored, and ranked on the basis of the following selection criteria and point system:

1. **Feasibility** - each application shall be reviewed for feasibility and the ability of the applicant to proceed to construction or rehabilitation of the project.

   a. **Experience** - Previous successful experience in development or rehabilitation of low income housing (projects of more than 4 units).

      (1) - No demonstrated experience 0 pts
      (2) - 1 to 5 projects to
      (3) - 5+ projects 6 pts

   b. **Competence** - Scoring of this criterion shall include an assessment of the general capabilities of the firm and individuals that will be engaged in the project. Indicators that will be considered include various professional and technical achievements; the size, facilities, equipment, diversification, depth of personnel, and overall experience of the firm; the applicable experience of the proposed assigned staff.

      (1) - Not capable 0 pts
      (2) - Limited capability to
      (3) - Minimum capability 6 pts

   c. **Financial Responsibility** - The application of this criteria, an assessment of the financial status of the firm and its ability to devote necessary financial resources to the project, shall include the following: capitalization, the number of years the firm has been in business, the bonding capability of the firm, and the bond, credit or industry rating as they relate to the financial strength of the Firm.

      (1) - Financially weak 0 pts
      (2) - Financially sound to
      (3) - Financially very sound 6 pts
d. **Financing (Construction/Permanent) Commitment** - The application should provide commitments for both interim (construction) and permanent financing from lenders, as applicable. The commitment(s) may be a copy of the note, loan agreement, or any document, which contains the terms, interest rate and any other condition(s) provided by the lender. The term "firm commitment" for the purpose of this application is defined as: A commitment letter from a lender stating that the mortgage loan has been approved for a specific amount, term, and interest rate (A higher level of commitment will result in a proportionately higher score).

1. **Construction financing**
   - No commitment: 0 pts
   - Conditional commitment: to
   - Firm commitment: 6 pts

2. **Permanent financing**
   - No commitment: 0 pts
   - Conditional commitment: 2 pts
   - Firm commitment: 6 pts

2. **Design** - The quality of the design, within cost-containment, modest design constraints, and the design process, providing for citizen/resident input, shall be of primary importance. (NOTE: This criteria is not applicable to existing structures where the developer is not contemplating major rehabilitation.)

a. **Overall Design Objectives** - the design philosophy and objectives and the resultant design process shall engender a comprehensive approach addressing such issues as site and unit design, security, Crime Prevention Through Environmental Design (CPTED), utility and energy conservation, and reduced maintenance cost. Resident and neighborhood participation is a critical and indispensable part of the design process leading to the final design. This participation process must be documented and presented.

1. **Fair**
   - 0 pts
2. **Good**
   - 2 pts
3. **Excellent**
   - 4 pts
b. **Site Utilization** - Imaginative use of the site as to the relationship between living units to each other and to open area, recreational areas and service areas; ease of services and maintenance; privacy and safety as well as unity.

   (1) - Fair 0 pts
   (2) - Good to
   (3) - Excellent 4 pts

c. **Design Quality and Efficiency** - Quality and efficiency of design of living units which should be attractive and offer a variety and imaginative use of materials.

   (1) - Fair 0 pts
   (2) - Good to
   (3) - Excellent 6 pts

d. **Energy Efficiency** - Utilization of energy efficient design approaches and materials.

   (1) - Fair 0 pts
   (2) - Good to
   (3) - Excellent 6 pts

e. **Quality of Materials** - Utilization of quality, durable materials that meets or exceeds minimum property standards and local building codes.

   (1) - Fair 0 pts
   (2) - Good to
   (3) - Excellent 6 pts

3. **Property Management** - Professional property management, with the meaningful participation of residents in the establishment of property management policies, is essential to the long-term success of the project. The application shall contain a property management and maintenance plan reflecting this philosophy.

a. **Experience** - Previous successful experience in management, marketing and maintenance of low income housing (projects of more than 4 units).
(1) - No demonstrated experience 0 pts
(2) - 1 to 5 projects to
(3) - 5+ projects 6 pts

b. **Management Plan** - Property management and maintenance plan provides for meaningful participation of residents in the establishment of policies, including grievance procedures.

(1) - No participation 0 pts
(2) - Some participation to
(3) - Full participation 6 pts

c. **Resident Participation** - Property management and maintenance plan provides for resident participation in resident selection and assignment.

(1) - No participation 0 pts
(2) - Some participation to
(3) - Full participation 4 pts

d. **Resident Recruitment** - Property management and maintenance plan provides for the recruiting of residents for available paying jobs specified in the plan.

(1) - No recruiting 0 pts
(2) - 1 to 2 resident jobs to
(3) - 3+ resident jobs 6 pts

4. **Site Selection** - Each of HUD's housing construction programs has site and neighborhood standards by which an assessment can be made of the physical adequacy of the proposed site, its suitability the standpoint of facilitating and furthering compliance with applicable civil rights laws, and its accessibility to various services.

a. **Site Characteristics** - Adequacy of site in size, exposure, and contours to accommodate the number and type of units proposed.

(1) - Fair 0 pts
(2) - Good to
(3) - Excellent 4 pts
b. **Existing Services** - Adequacy of utilities (water, sewer, gas, and electricity and streets) available to service the site.

(1) - Fair 0 pts  
(2) - Good to  
(3) - Excellent 4 pts

c. **Location** - Accessibility of site to social, recreational, educational, commercial, and health facilities and services.

(1) - Fair 0 pts  
(2) - Good to  
(3) - Excellent 6 pts

d. **Access** - Proximity and availability of public transportation to places of employment providing a range of jobs for lower income workers.

(1) - Fair 0 pts  
(2) - Good to  
(3) - Excellent 4 pts

e. **Zoning** - Compliance of site with local zoning and land use regulations.

(1) Zoning is not correct (i.e., inconsistent with proposed use) 0 pts  
(2) Zoning is correct (i.e., consistent with proposed use) 4 pts

**Maximum Point Breakdown:**
- Development Capacity..................30
- Physical Design Plan...................26
- (Proposal Scoring Worksheets  
  Management)..........................22
- Site & Neighborhood...................22

**Total......................................100**
Scoring/Award/Evaluation Criteria

A. The Competitive Negotiation Process will be used to select the contract award, beginning with the highest ranked firm. AHA reserves the right to negotiate a contract with Respondents who provide the best value to AHA.

B. AHA will select the proposal(s) that is the most advantageous to AHA based on the evaluation criteria stated. AHA has the right to negotiate price and other factors with any or all acceptable proposals.

Review of Work Write-Up And Cost Estimate

Before final award, all Owners proposing to do a rehabilitation project will be required to submit a work write-up and cost estimate of work to be performed. All work write-ups must specify the types and amount of material to be used. Staff will review such write-ups for a determination on the specific work items required to meet HQS. Staff will meet with the Owner and his/her contractor to discuss the work to be performed. If any additional information is needed or corrections must be made, AHA will inform the Owner and contractor following the notifications specified above.

Execution of Agreement

After the Owner has completed all of the steps required before the start of work, staff will prepare the Agreement to enter into a Housing Assistance Payment Contract. Prior to contract execution, a meeting will be held to discuss the document with the Owner.

Selection of Contractors

It will be the Owners responsibility to select his/her project contractor. AHA will not provide a list of contractors to owners. The selection of all contractors must be in accordance with 24 C.F.R. Part 882.731. Owners who propose to do part or all of the work themselves must obtain advance written approval from AHA. Owners will not be allowed to undertake work themselves unless they are licensed contractors.

The Owner and his/her contractor will be invited to attend a Pre-Construction Conference at which time the staff will explain the requirements of the program. Sample contract, Labor Standards Requirements Section 3 information and Davis-Bacon Wage Rates will be provided at this time. This procedure will ensure that all contractors understand program requirements. Subcontractors may be invited to this Pre-Construction Conference to assure compliance with Davis-Bacon Wage or Section 3 requirements.
Inspection of Work and Monitoring of Program Requirements

Prompt completion of work, compliance with Labor Standards and Davis-Bacon Wage Rates (where applicable), and adherence to good construction practices will be monitored through periodic inspections of each project. Inspections will be scheduled as major work items are completed; however, where major work will be hidden in walls, floors, etc., inspections will be scheduled prior to final cover-up. AHA will coordinate these inspections with the Owners. The normal schedule of local building inspectors by local government entities will be conducted in accordance with local standards.

Changes to the Work or Contract Amount

The Owner will be required to request approval in writing in advance for any changes to the work items specified in the Agreement, which would alter the design or the quality of the work. Generally, change orders will not be approved unless the cause of the proposed change is beyond the contractor’s control and/or is in the best interest of the project. AHA reserves the right to disapprove any changes requested by the Owner.

Project Completion

1. **Scheduling the Final Inspection.** Owners are required to advise AHA at least thirty (30) days prior to the completion of work. When AHA is notified by an Owner of impending completion of work, staff will tentatively schedule a final inspection based on the estimated completion date and will remind the Owner of the documents, which he/she will need to submit before the unit can be accepted. Such documents will include the Certificate of Occupancy, signed Building Permit card by required Building Inspector and the Certification required by 24 C.F.R. Part 882.733.

2. **Completing the Final Inspection.** Owners will be responsible for obtaining building and electrical code inspections if the nature of the work requires them. At the final inspection, all work items required by the Agreement will be inspected and a determination regarding compliance with City Housing Code, HQS, and the specifications contained in the Agreement will be made. The Owner and the contractor will be requested to participate in the final inspection so that deficiencies can be discussed if any.

   A written copy of a punch list, detailing deficient work items, and a schedule for their completion, and the amount which must be escrowed with AHA pending completion of the work items will be provided to the Owner and contractor. This only applies to minor
deficiencies or items, which are incomplete because of weather conditions.

3. **Acceptance of the Units.** Units, which pass final inspection with no deficiencies and units with minor deficiencies will be accepted at the time of final inspection. If minor deficiencies exist, staff will tentatively schedule a date to inspect any work remaining to be done. Units with other than minor deficiencies will not be accepted until the deficiencies are corrected to the satisfaction of AHA. Resolution of deficiencies will be the responsibility of the Owner.

No later than acceptance, the Owner will be required to submit the local permits and approvals required as evidence of completion. In addition, the Certificate of Occupancy and any other required permits will be obtained from the Owner at the time of acceptance. Owners will be required to provide final Davis-Bacon Wage Information, Section 3 Compliance and provide copies of Release of Lien for the property.

**Execution of HAP**

After AHA has inspected and accepted the units in the project, the parties will execute the Housing Assistance Payment Contract. The effective date of the HAP may not be earlier than the acceptance of the units; however, in the case of a large project AHA may exercise its option to phase in the project.
CHAPTER 28: HOMEOWNERSHIP PROGRAM

Preamble

The Housing Choice Homeownership (HO) Program was authorized by Section 555 of the Quality Housing and Work Responsibility Act of 1998. The homeownership option is used to assist a family residing in a home purchased and owned by one or more members of the family. The Housing Authority of the City of Atlanta, Georgia, (AHA) will provide tenant based assistance to an eligible and qualified family that purchases a dwelling unit that will be occupied by the family according to the criteria stated in this policy.

Program Size

AHA will begin implementation of the Home Ownership Program with a pilot of 10 participants. The ultimate program size will be limited only by AHA's ability to secure funds, affordable homes and qualified participants.

AHA Marketing and Homeownership Program Outreach

AHA will use the following marketing tools to ensure program information is made available to waiting list applicants, current Housing Choice program participants and the greater Atlanta community:

1. Formation of a Homeownership Program Committee
2. Development of a Homeownership Program Brochure
3. HO information included in waiting list notification letters
4. HO information included in Housing Choice briefing packet and explanation of HO opportunities in family briefing sessions
5. HO information presented in FSS counseling sessions
6. HO posters in AHA reception areas, public housing sites, and community service agencies
7. Quarterly announcements of applications being solicited for Homeownership program
8. Articles in AHA newsletters
Home Ownership Application Process

AHA will announce the acceptance of letters of interest for the Homeownership Program to Housing Choice Program participants via

1. Written notice
2. Posters in the AHA reception
3. Announcements in local and minority newspapers

Home Ownership Applicant Review and Selection

The Homeownership Committee will review applications on a quarterly basis and make recommendations of candidates for homeownership program participation. AHA will review the applications for meeting the seven mandatory qualifications stated below prior to submitting the applications to the Homeownership Committee for final selection.

Families will be notified in writing of their progress in the review process. AHA may employ additional screening processes to ensure successful participation in the Homeownership Program. Other screening processes may include interviews, letters of reference, and/or a statement of interest by the family with a description of the strategy the family will employ for successful homeownership.

The Homeownership Committee may deem it necessary to adopt other criteria in the selection process to ensure that the goals of the families, the housing agency, and the financial institutions are met in the operation of the Homeownership Program.

AHA Eligibility Qualifications

Applicants to the homeownership program must be:

1. Participants in the Family Self-Sufficiency Program who have successfully met interim goals and are actively working towards the completion of the FSS Contract of Participation.

2. Full-time employees with minimum of twenty-four (24) months of continuous employment (Disabled or elderly households are exempted from the employment requirement. Families with a disabled member of the household may request an exemption from the employment requirement under reasonable accommodation.)
3. Participants in the Housing Choice 8 Voucher program for a minimum of two (2) years

4. First time homebuyers

A first time homebuyer is a participant or a family member that had ownership interest in a residence no more than three (3) years before the start of participation in the home ownership assistance program.

Exceptions to the above definition are:

(a) Currently single parents or displaced persons that, while married, owned a home with a spouse

(b) Members of a housing cooperative

(c) Reasonable accommodation for a family with a disabled member of the household

5. In full compliance with their current lease and all other Housing Choice program requirements and properly terminate his/her lease agreement according to the terms of that lease upon participation in the HO program

6. A head of household or spouse that has not previously defaulted on a mortgage obtained through the HO program

7. Participants in a pre-purchase counseling program

The above criteria reflect AHA's minimum qualifications for consideration in the Homeownership Assistance program. All seven criteria must be met for consideration in the program. AHA will review all candidates and make a selection based on those candidates with the best likelihood for meeting the obligations of the program such as a successful rental payment history and care of their rental unit.

Minimum Income Requirements

The minimum income requirement is 2,000 hours of annual full-time work at the federal minimum wage ($10,400). All adults who will have an ownership interest in the home must meet the minimum income requirement.
Employment Requirements

Full-time employment is defined as not less than an average of 30 hours per week. The family must demonstrate that one or more adults members of the family who will own the home at commencement of home ownership assistance has been continuously employed during the year before commencement of home ownership assistance for the family.

All adults who will have an ownership interest in the home must comply with the employment requirement. In determining initial eligibility for meeting the employment requirements, employment interruptions of a maximum of 30 days total for a 12-month period are permissible. AHA may consider successive employment during the one-year period and self-employment in a business.

Program participants are expected to maintain employment throughout participation in the program. In the case of a layoff, the family will need to find replacement employment within a maximum period of 180 days in order to continue participation in the program. If the employed person becomes disabled while participating in the homeownership program, the employment requirement will be waived.

Disregard of Welfare Income

Welfare assistance will be disregarded as income in determining the family’s initial ability to meet the minimum annual income requirements for participation in the homeownership assistance program. Welfare assistance includes payments made in the Temporary Assistance to Needy Families, but does not include child support payments received through the Department of Family and Children Services Child Support Enforcement Unit.

The disregard of welfare assistance does not apply in the determination of income-eligibility for admission to the voucher program, calculation of the amount of the family’s total tenant payment gross family contributions, or calculation of the amount of home ownership assistance payments on behalf of the family.

Exemptions for Elderly and Disabled Households

The employment requirement does not apply to an elderly family or disabled family. Furthermore, if a family, other than an elderly family or a disabled family, includes a person with disabilities, AHA will grant an exemption if needed as a reasonable accommodation so that the program is readily accessible to and usable by persons with disabilities.
In addition, in the case of an elderly family or a disabled family, AHA will include welfare assistance income in determining eligibility in meeting the minimum annual income requirements.

**Housing Counseling**

Once a participant is deemed eligible, all persons who will have an ownership interest in the home must attend pre-purchase counseling sessions with AHA’s HUD approved counseling agency. The initial session will include a review of the amount of mortgage a family can afford. Additional topics to be cover are as follows:

1. Home maintenance (including care of the grounds);
2. Budgeting and money management;
3. Credit counseling;
4. How to negotiate the purchase price of a home;
5. How to obtain home ownership financing and loan pre-approvals, including a description of types of financing that may be available, and the pros and cons of different types of financing;
6. How to find a home, including information about homeownership opportunities, schools, and transportation in the AHA’s jurisdiction;
7. Advantages of purchasing a home in an area that does not have a high concentration of low-income families and how to locate homes in such areas;
8. Information on fair housing, including fair housing lending and local fair housing enforcement agencies;
9. Information about the Real Estate Settlement Procedures Act (12 U.S.C. 2601 ET seq.)(RESPA), State and Federal Truth-in-lending laws; and
10. How to identify and avoid loans with oppressive terms and conditions.

Post counseling sessions will be conducted by the Family Self-Sufficiency Counselor for the length of AHA’s participation in the mortgage. The FSS Counselor will conduct annual recertifications and monitor all other program requirements geared toward the family assuming total responsibility of the entire mortgage and abiding by the Family Obligations to the program.
Voucher Issuance

It is the policy of the Atlanta Housing Authority to issue a Home Ownership Letter and not a Housing Voucher to the participants of the homeownership assistance program. The letter provides the following information:

1. The family is approved to receive HO assistance according to subsidy standards
2. An explanation of program rules including financing requirements and restrictions
3. How the HO assistance is determined and received
4. The Family Obligations to the program

Home Purchase Procedures and Requirements

The family will have a maximum time of six (6) months from the date of the issuance of the HO Letter to find a home and enter into a contract to purchase.

The Contract of Sale must:

1. include the specific price and other terms of sale
2. allow for pre-purchase inspection
3. allow for cancellation if the inspection is not satisfactory
4. not obligate the Purchaser (Participant) to make repairs.
5. include a Certification that the seller has not been debarred

An extension for additional three- (3) months may be granted before the expiration of the housing search period at the discretion of the Home Ownership Coordinator upon the written request of the Applicant.

Eligible Housing Types

For a home to be eligible for purchase, it must be under construction or already existing.
AHA Monitoring of Housing Search

The AHA may require periodic family report on the family’s progress in finding and purchasing a home. If a family is unable to purchase a home within the maximum time established above, the Authority may issue the family a rental voucher to lease a unit or family may remain in current unit.

Contract of Sale Requirements

Before commencement of home ownership assistance, a member or members of the family must enter into a contract of sale with the seller of the unit that is to be purchased by the family. The family must give AHA a copy of the contract of sale immediately after full execution.

The contract of sale must:

1. Specify the price and other terms of sale by the seller to the purchaser.

2. Provide that the purchaser will arrange for a pre-purchase inspection of the dwelling unit by an independent inspector selected by the purchaser.

3. Provide that the purchaser is not obligated to purchase the unit unless the inspection is satisfactory to the purchaser.

4. Provide that the purchaser is not obligated to pay for any necessary repairs.

5. Contain a certification from the seller that the seller has not been debarred, suspended, or subject to a limited denial of participation by HUD.

Inspection Requirements

The home must be inspected by AHA and must meet or exceed Housing Quality Standards (HQS). The independent inspection must cover major building systems and components, including foundation and structure, housing interior and exterior, roofing, plumbing, electrical, and heating systems.

Independent Inspector

The family is required to employ and pay for an independent professional home inspector to inspect the home prior to purchase. The independent inspector must
be qualified to report on property conditions, including major building systems and components. AHA cannot require the family to use an independent inspector selected by AHA. The independent inspector may not be an AHA employee or contractor, or other person under control of the Authority. However, AHA may establish standards for qualification of inspectors selected by families under the home ownership option.

**Inspection Report**

A copy of the inspection report must be given to the family and AHA upon completion. AHA may not commence home ownership assistance for the family until AHA has reviewed the inspection report of the independent inspector. The family and AHA must determine whether any pre-purchase repairs are needed. Even if the unit otherwise complies with HQS (and may qualify for assistance under the AHA’s tenant-based rental voucher program), AHA shall have discretion to disapprove the unit for assistance under the home ownership option because of information in the inspection report.

**Accessibility Modifications**

Accessibility modifications are an eligible home ownership expense.

**Ownership Interest Restrictions**

No family member may have a present ownership interest in a residence at the commencement of home ownership assistance for the purchase of any home.

No family member may have a present ownership interest in a second residence while receiving home ownership assistance. The authority is prohibited from continuing assistance to a family with interest in a prior home by any family member.

**Financing Parameters**

**Down Payments**

All families are required to secure their own financing. AHA requires a minimum down payment of 3% from which at least 1% must come from the family’s personal resources. (Personal resources may include Family Self-Sufficiency escrow account balances.)

**Financing Requirements**

All financing is required to be insured or guaranteed by the State or Federal government and meet underwriting requirements for the secondary mortgage market or private sector underwriting standards. If the home is financed with
FHA mortgage insurance, such financing is subject to FHA mortgage insurance requirements. Non-FHA insured loans are not subject to this requirement.

AHA has the right of approval of all refinancing arrangements or the securing of additional financing on the home. In addition, AHA has the right to disapprove proposed financing, refinancing or other debt, if AHA determines that the lender or loan terms do not meet AHA qualifications. AHA will make Payments directly to the lending institution and any excess shall be paid directly to the family on a monthly basis.

Prohibited Financing Arrangements

AHA will prohibit any financing that includes the following:
1. Financing that involves balloon payments
2. variable interest financing
3. private seller financing

Affordability Determinations

AHA may disapprove financing if it is determined that the debt to the Family is unaffordable, notwithstanding that all other financing and eligibility requirements have been met. Such determination will be made at the sole discretion of the Program Administrator.

Maximum Term of Homeownership Assistance

The maximum term of home ownership assistance is **fifteen (15) years** if the mortgage term is **twenty (20) years** or longer. If the mortgage term is **less than twenty (20) years**, the maximum term of home ownership assistance is **ten (10) years**. This requirement applies to any member of the household or their spouse who has an ownership in the unit/house during the time that home ownership payments are made.

Elderly Exemption to Maximum Term

Elderly families are exempted from the maximum term of homeownership assistance if the family was deemed an “elderly family” at commencement of home ownership assistance.

Disabled Exemption to Maximum Term

A disabled family is exempted from the maximum term for homeownership assistance if at any time during receipt of home ownership assistance the family qualifies as a “disabled family”. In the event that a family ceases to qualify as a
“disabled family”, the maximum term requirement applies from the date home
ownership assistance commenced. However, the family will receive at least six-
(6) months’ assistance after the maximum term becomes applicable.

If the family has received home ownership assistance for different homes, or
from different PHA’s, the total of such assistance terms is subject to the
maximum term.

**Automatic Termination of Homeownership Assistance**

Home ownership assistance automatically terminates 180 calendar days after the
last housing assistance payment on behalf of the family. AHA may consider
evidence of extreme hardship and extend this period up to an additional 180
days.

**Termination of Homeownership Assistance for Failure to Comply with
Family Obligations**

Continued participation in the homeownership assistance program is dependent
on the family’s compliance with the family’s program obligations as explained in
the AHA Housing Choice Family Handbook and program briefing.

In order to remain in good standing with the Homeownership Assistance
Program, the family must:

1. Supply any information that the HA or HUD determines to be necessary
   including evidence of citizenship or eligible immigration status, and
   information for use in regularly scheduled re-examination or interim re-
   examination of family income and composition. Two missed appointments
to supply the HA with this information is considered a breach of a family
responsibility. Increase in family income above $100 a month must be
reported to the HA within 30 days from the effective date of change.

2. Disclose and verify social security numbers and sign and submit consent
   forms for obtaining information.

3. Supply any information requested by the HA to verify that the family is living
   in the unit or information related to family absence from the unit.

4. Promptly notify the HA in writing when the family is away from the unit for
   an extended period of time in accordance with HA policies.
5. Allow the HA to inspect the unit at reasonable times and after reasonable notice. Two missed appointments for inspection are considered a breach of this family responsibility.

6. Notify the HA in writing before moving out of the unit.

7. Use the assisted unit for residence by the family. The unit must be the family’s only residence.

8. Promptly notify the HA in writing of the birth, adoption, or court-awarded custody of a child.

9. Request HA written approval to add any other family member as an occupant of the unit.

10. Promptly notify the HA in writing if any family member no longer lives in the unit.

11. Give the HA a copy of foreclosure notice.

12. Pay utility bills and provide and maintain any appliances.

13. Attend regularly scheduled homeownership training and counseling programs.

The family must not:

1. Commit fraud, or bribery or any other corrupt or criminal act in connection with the program.

2. Participate in illegal drug or violent criminal activity.

3. Sublease or let the unit or assign the lease or transfer the unit.

4. Receive Housing Choice Voucher program housing assistance while receiving another housing subsidy, for the same unit or a different unit under any other Federal, State or Local housing assistance program.

5. Damage the unit or premises (other than damage from ordinary wear and tear) or permit any guest to damage the unit or premises.

6. Engage in illegal use of a controlled substance; or abuse of alcohol that threatens the health, safety or right to peaceful enjoyment of the premises by other residents and persons residing in the immediate vicinity of the premises.
7. Engage in threatening, abusive or violent behavior toward any HA personnel.

If the family fails to meet any of the obligations stated above, AHA will send the family and the applicable financial institution a notice of pending termination specifying the family’s failure to comply with the program rules.

Informal Hearing Procedures

The family will have 10 days to request an informal hearing to contest the termination decision. If the family does not present sufficient information at the informal hearing to overturn the decision to terminate participation in the homeownership assistance program, the termination will be made effective on the date stated in the Notice of Pending Termination. If the family does not request an informal hearing, the termination will be made effective on the date stated in the Notice of Pending Termination.

Abatement of Homeownership Assistance Payments

AHA will stop the assistance payment to the bank on the effective date of the termination from the homeownership assistance program. If the family defaults on making the entire payment to the bank, the bank must begin foreclosure proceedings.

Settlement of Foreclosure

If the property happens to be sold under a foreclosure sale for more than the balance due on the mortgage, the family will be eligible to receive any equity earned in the property. However, if the family is terminated from the homeownership program due to drug or criminal activity, the family will forfeit any equity in the property.

Portability Procedures

A family that has been determined eligible for home ownership assistance by the initial PHA may purchase a unit outside the initial PHA’s jurisdiction, if the receiving PHA is administering a voucher home ownership program and is accepting new home ownership families. The portability procedures for the Housing Choice Voucher Programs apply to the home ownership option. The administration responsibilities of the initial and receiving PHA are the same,
except that some administrative functions such as issuance of a voucher or execution of a tenancy addendum do not apply to the homeownership option.

**Continued Assistance after Mortgage Defaults**

AHA will terminate voucher home ownership assistance for any member of a family that is dispossessed from the home pursuant to a judgement or order of foreclosure on any mortgage securing a debt incurred to purchase the home, or any refinancing of such debt. AHA may consider continuing voucher rental assistance in such cases.

**Recaptures of Homeownership Assistance Upon Sale or Refinancing of Home**

Sales proceeds that are used by the family to purchase a new home with Housing Choice Programs home ownership assistance are not subject to recapture. Refinancing for a lower mortgage rate or better mortgage term is not subject to recapture. Proceeds realized upon refinancing that are retained by the family are subject to recapture. A family receiving home ownership assistance is required to execute documentation that secures AHA’s right to recapture the home ownership assistance. The lien securing the recapture of home ownership subsidy may be subordinated to a refinanced mortgage. The amount of home ownership assistance subject to recapture shall automatically be reduced over a 10-year period, beginning one year from the purchased date, in annual increments of 10 percent. At the end of the 10-year period, the amount of the home ownership assistance subject to recapture will be zero.

In case of the sale of the home, the recapture shall be in an amount equaling the lesser of:

1. The amount of home ownership assistance provided to the family, adjusted according to 10 year provision; or

2. The difference between the sales price and purchase price of the home, minus:

   a. The cost of any capital expenditures;

   b. The costs incurred by the family in the sale of the home (such as sales commission and closing costs);

   c. The amount of the difference between the sales prices and purchase price that is being used, upon sale, towards the
purchase of a new home under the Housing Choice Voucher home ownership option; and

d. Any amounts that have been previously recaptured, in accordance with this section.

In the case of a refinancing of the home, the recapture shall be in an amount equaling the lesser of:

1. The amount of home ownership assistance provided to the family, adjusted as described in this section; or

2. The difference between the current mortgage debt and the new mortgage debt; minus;
   a. The cost of any capital expenditures;
   b. The costs incurred by the family in the refinancing of the home (such as closing costs; and
   c. Any amounts that have been previously recaptured as a result of refinancing.

The recapture amount shall be determined using the actual sales price of the home, unless the sale is to an identity-of-interest entity. In the case of identity-of-interest transactions, AHA shall establish a sale price based on fair market value.
# Fiscal Year 2005 Comprehensive Operating and Capital Budget

## As of June 10, 2004

<table>
<thead>
<tr>
<th>AHA Programs</th>
<th>MTW Funds</th>
<th>Development, HOPE VI, and RHF</th>
<th>Housing Choice (Non-MTW Vouchers)</th>
<th>11b</th>
<th>M2M</th>
<th>Ga HAP</th>
<th>Gates</th>
<th>Other Funds</th>
<th>AHA Total</th>
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## Uses

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<td><strong>Total Corporate Expenses</strong></td>
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<td>AHA Salaries and Benefits (includes 4% pay adjustment and severance)</td>
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### Section 1

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<tr>
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<td>130 John Wesley Dobbs Avenue NE</td>
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<td>Atlanta, GA 30303-2429</td>
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<td>j)</td>
<td>No. of HA Units</td>
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<td>Available (UMAs)</td>
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<td>Subject FYE</td>
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### Section 2

**Part A. Allowable Expenses and Additions**

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<thead>
<tr>
<th>Line</th>
<th>Description</th>
<th>Requested by PHA (PUM)</th>
<th>HUD Modifications (PUM)</th>
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<tr>
<td>01</td>
<td>Previous allowable expense level (Part A, Line 08 of form HUD-52723 for previous year)</td>
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<td>02</td>
<td>Part A, Line 01 multiplied by .005</td>
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<td>03</td>
<td>Delta from form HUD-52720-B, if applicable (see instructions)</td>
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<td>04</td>
<td>&quot;Requested&quot; year units from latest form HUD-52720-A (see instructions)</td>
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<td>05</td>
<td>Add-ons to allowable expense level from previous fiscal year (see instructions)</td>
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<tr>
<td>06</td>
<td>Total of Part A, Lines 01, 02, 03 and 05</td>
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<td>07</td>
<td>Inflation factor</td>
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<td>08</td>
<td>Revised allowable expense level (AEL) (Part A, Line 06 times Line 07)</td>
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<td>09</td>
<td>Transition Funding</td>
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<tr>
<td>10</td>
<td>Increase to AEL</td>
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<td>11</td>
<td>Allowable utilities expense level from form HUD-52722-A</td>
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<td>13</td>
<td>Costs attributable to deprogrammed units</td>
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<td>Total Allowable Expenses and Additions (Sum of Part A, Lines 08 thru 13)</td>
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**Part B. Dwelling Rental Income**

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<td>Average monthly dwelling rental charge per unit for current budget year (Part B, Line 01 + Line 02)</td>
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<td>17</td>
<td>Average monthly dwelling rental charge per unit for prior budget year</td>
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<td>Average monthly dwelling rental charge per unit for budget year 2 years ago</td>
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<td>Three-year average monthly dwelling rental charge per unit (Part B, Line 03 + Line 04 + Line 05) / 3</td>
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<td>50/50 Income split (Part B, Line 03 + Line 04 + Line 05) / 2</td>
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<td>Average monthly dwelling rental charge per unit (lesser of Part B, Line 03 or Line 07)</td>
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<td>Projected average monthly dwelling rental income per unit (Part B, Line 10 times Line 11)</td>
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**Part C. Non-dwelling Income**

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### Part D. Add-ons for changes in Federal law or regulation and other eligibility

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<td>Family Self Sufficiency Program</td>
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<td>Energy Add-On for loan amortization</td>
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<tr>
<td>05</td>
<td>Unit reconfiguration</td>
<td></td>
<td></td>
</tr>
<tr>
<td>06</td>
<td>Non-dwelling units approved for subsidy</td>
<td></td>
<td>79,899</td>
</tr>
<tr>
<td>07</td>
<td>Long-term vacant units</td>
<td></td>
<td></td>
</tr>
<tr>
<td>08</td>
<td>Phase Down for Demolitions</td>
<td></td>
<td>338,933</td>
</tr>
<tr>
<td>09</td>
<td>Units Eligible for Resident Participation:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>10</td>
<td>Occupied Units (Part B, Line 02)</td>
<td>8,553</td>
<td></td>
</tr>
<tr>
<td>11</td>
<td>Employee Units</td>
<td></td>
<td></td>
</tr>
<tr>
<td>12</td>
<td>Police Units</td>
<td></td>
<td></td>
</tr>
<tr>
<td>13</td>
<td>Total Units Eligible for Resident Participation</td>
<td>8,563</td>
<td>214,075</td>
</tr>
<tr>
<td>14</td>
<td>Funding for Resident Participation (Part D, Line 12 x $25)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>15</td>
<td>Total add-ons (sum of Part D, Lines 01, 02, 03, 04, 05, 06, 07, 08, 13 and 14)</td>
<td>765,562</td>
<td></td>
</tr>
</tbody>
</table>

### Part E. Calculation of Operating Subsidy Eligibility Before Adjustments

<table>
<thead>
<tr>
<th>Line No.</th>
<th>Description</th>
<th>Amount (Whole Dollars)</th>
</tr>
</thead>
<tbody>
<tr>
<td>01</td>
<td>Deficit or (Income) before adjustments (Total of Part C, Line 04 and Part D, Line 15)</td>
<td>32,334,820</td>
</tr>
<tr>
<td>02</td>
<td>Actual cost of Independent Audit (IA)</td>
<td>123,072</td>
</tr>
<tr>
<td>03</td>
<td>Operating subsidy eligibility before adjustments (greater of Part E, Line 01 or Line 02) (If less than zero, enter zero (0))</td>
<td>32,334,820</td>
</tr>
</tbody>
</table>

### Part F. Calculation of Operating Subsidy Approvable for Subject Fiscal Year (Note: Do not revise after the end of the subject FY)

#### HUD Use Only (Note: Do not revise after the end of the subject FY)

<table>
<thead>
<tr>
<th>Line No.</th>
<th>Description</th>
<th>Amount (Whole Dollars)</th>
</tr>
</thead>
<tbody>
<tr>
<td>01</td>
<td>Utility Adjustment for Prior years</td>
<td>(1,230,827)</td>
</tr>
<tr>
<td>02</td>
<td>Additional subject fiscal year operating subsidy eligibility (specify)</td>
<td></td>
</tr>
<tr>
<td>03</td>
<td>Unfunded eligibility in prior fiscal years to be obligated in subject fiscal year</td>
<td></td>
</tr>
<tr>
<td>04</td>
<td>HUD discretionally adjustments</td>
<td></td>
</tr>
<tr>
<td>05</td>
<td>Other (specify)</td>
<td></td>
</tr>
<tr>
<td>06</td>
<td>Other (specify)</td>
<td></td>
</tr>
<tr>
<td>07</td>
<td>Unfunded portion due to proration</td>
<td>(                      )</td>
</tr>
<tr>
<td>08</td>
<td>Net adjustments to operating subsidy (total of Part F, Lines 01 thru 07)</td>
<td>-1,230,827</td>
</tr>
<tr>
<td>09</td>
<td>Operating subsidy approvable for subject fiscal year (total of Part E, Line 03 and Part F, Line 08)</td>
<td>31,103,963</td>
</tr>
</tbody>
</table>

### Part G. Memorandum of Amounts Due HUD, Including Amounts on Repayment Schedules

<table>
<thead>
<tr>
<th>Line No.</th>
<th>Description</th>
<th>Amount (Whole Dollars)</th>
</tr>
</thead>
<tbody>
<tr>
<td>01</td>
<td>Total amount due in previous fiscal year (Part G, Line 04 of form HUD-52723 for previous fiscal year)</td>
<td></td>
</tr>
<tr>
<td>02</td>
<td>Total amount to be collected in subject fiscal year (Identify individual amounts under Section 3)</td>
<td>(                      )</td>
</tr>
<tr>
<td>03</td>
<td>Total additional amount due HUD (include any amount entered on Part F, Line 11) (Identify individual amounts under Section 3)</td>
<td>(                      )</td>
</tr>
<tr>
<td>04</td>
<td>Total amount due HUD to be collected in future fiscal year(s) (Total of Part G, Lines 01 thru 03) (Identify individual amounts under Section 3)</td>
<td>(                      )</td>
</tr>
</tbody>
</table>

---

*Previous edition is obsolete for PHA Fiscal Years beginning 1/1/2001 and thereafter*
<table>
<thead>
<tr>
<th>Line No.</th>
<th>Description</th>
<th>Requested by PHA (Whole Dollars)</th>
<th>HUD Modifications (Whole Dollars)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Line 1</td>
<td>This part is to be completed only after the subject fiscal year has ended.</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Indicate the types of adjustments that have been reflected on this form:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2</td>
<td>Utility adjustment from form HUD-52722-B</td>
<td></td>
<td></td>
</tr>
<tr>
<td>3</td>
<td>Deficit or (income) after adjustments (total of Part E, Line 01 and Part H, Line 02)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>4</td>
<td>Operating subsidy eligibility after year-end adjustments (greater of Part E, Line 02 or Part H, Line 03)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>5</td>
<td>Part E, Line 03 of latest form HUD-52723 approved during subject FY (Do not use Part E, Line 03 of this revision)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>6</td>
<td>Net adjustments for subject fiscal year (Part H, Line 04 minus Part H, Line 05)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>7</td>
<td>Utility adjustment (enter same amount as Part H, Line 02)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>8</td>
<td>Total HUD discretionary adjustments (Part H, Line 06 minus Line 07)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>9</td>
<td>Unfunded portion of utility adjustment due to proration</td>
<td></td>
<td></td>
</tr>
<tr>
<td>10</td>
<td>Unfunded portion of HUD discretionary adjustment due to proration</td>
<td></td>
<td></td>
</tr>
<tr>
<td>11</td>
<td>Prorated utility adjustment (Part H, Line 07 plus Line 09)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>12</td>
<td>Prorated HUD discretionary adjustment (Part H, Line 08 plus Line 10)</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Remarks (provide part and line numbers)

hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate.

Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

Signature of Authorized Field Office Representative & Date: 3/14/04

Signature of Authorized Field Office Representative & Date: X

previous edition is obsolete for PHA Fiscal Years beginning 1/1/2001 and thereafter
<table>
<thead>
<tr>
<th>Line No.</th>
<th>Description</th>
<th>Old Project Numbers (Data Held on lines 1,2,3)</th>
<th>New Project Numbers (Data listed on line 8)</th>
<th>Fiscal Year Ending</th>
<th>Submission</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Master List</td>
<td>ROLLING BASE FROZEN</td>
<td>June 30, 2005</td>
<td>Original Re-Submission Revision No.</td>
</tr>
<tr>
<td></td>
<td>UMA and actual consumption for old projects for 12 month period which ended 12 months before the Requested Budget Year.</td>
<td>[Table Cells]</td>
<td>[Table Cells]</td>
<td>[Table Cells]</td>
<td>[Table Cells]</td>
</tr>
<tr>
<td>01</td>
<td>105,703</td>
<td>1,010,933</td>
<td>69,096,000</td>
<td>4,000,108</td>
<td></td>
</tr>
<tr>
<td>02</td>
<td>105,703</td>
<td>939,474</td>
<td>67,424,079</td>
<td>3,627,025</td>
<td></td>
</tr>
<tr>
<td>03</td>
<td>105,703</td>
<td>977,316</td>
<td>66,155,522</td>
<td>3,988,369</td>
<td></td>
</tr>
<tr>
<td>04</td>
<td>Accumulated UMA and actual consumption of old projects (sum of lines 01, 02, 03)</td>
<td>317,169</td>
<td>2,927,528</td>
<td>202,675,601</td>
<td>11,617,202</td>
</tr>
<tr>
<td>05</td>
<td>Estimated Unit months available for old projects for Requested Budget Year.</td>
<td>105,703</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>06</td>
<td>105,703</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>07</td>
<td>Estimated UMA and consumption for old projects for Requested Budget Year (Each figure on line 04 divided by line 05 column 3)</td>
<td>[Table Cells]</td>
<td>[Table Cells]</td>
<td>[Table Cells]</td>
<td>[Table Cells]</td>
</tr>
<tr>
<td>08</td>
<td>Estimated UMA and consumption for new projects.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>09</td>
<td>Total estimated UMA and consumption for old and new projects for Requested Budget Year (line 01 + line 04)</td>
<td>[Table Cells]</td>
<td>[Table Cells]</td>
<td>[Table Cells]</td>
<td>[Table Cells]</td>
</tr>
<tr>
<td>10</td>
<td>Estimated cost of consumption on line 09 for Requested Budget Year (see instructions).</td>
<td>[Table Cells]</td>
<td>[Table Cells]</td>
<td>[Table Cells]</td>
<td>[Table Cells]</td>
</tr>
<tr>
<td>11</td>
<td>Total estimated cost for Requested Budget Year (sum of all columns of line 10)</td>
<td>[Table Cells]</td>
<td>[Table Cells]</td>
<td>[Table Cells]</td>
<td>[Table Cells]</td>
</tr>
<tr>
<td>12</td>
<td>Est. PLM cost of consumption for Requested Budget Year (Allowable Utilities Expense Level) (line 11 divided by line 09, col 5)</td>
<td>[Table Cells]</td>
<td>[Table Cells]</td>
<td>[Table Cells]</td>
<td>[Table Cells]</td>
</tr>
<tr>
<td>13</td>
<td>[Table Cells]</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>14</td>
<td>[Table Cells]</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>15</td>
<td>[Table Cells]</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Notes:**
- Units of Consumption: CCP, KWH, THERMS.
<table>
<thead>
<tr>
<th>Line No.</th>
<th>Description</th>
<th>Unit Months Available (3)</th>
<th>Sewerage and Water Consumption (4)</th>
<th>Electricity Energy Consumption (5)</th>
<th>Gas Consumption (6)</th>
<th>Fiscal Year Ending</th>
<th>Submission</th>
</tr>
</thead>
<tbody>
<tr>
<td>01</td>
<td>UMA and actual consumption for old projects for 12 month period which ended 12 months before the Requested Budget Year.</td>
<td>82,627</td>
<td>858,675</td>
<td>55,833,120</td>
<td>3,497,191</td>
<td>June 30, 2005</td>
<td>Original</td>
</tr>
<tr>
<td>02</td>
<td>UMA and actual consumption for old projects for 24 month period which ended 24 months before the Requested Budget Year.</td>
<td>82,627</td>
<td>771,946</td>
<td>52,363,759</td>
<td>3,003,312</td>
<td></td>
<td>Re-Submission</td>
</tr>
<tr>
<td>03</td>
<td>UMA and actual consumption for old projects for 36 month period which ended 36 months before the Requested Budget Year.</td>
<td>82,627</td>
<td>818,327</td>
<td>53,061,042</td>
<td>3,514,203</td>
<td></td>
<td>Revision No. ( )</td>
</tr>
<tr>
<td>04</td>
<td>Accumulated UMA and actual consumption of old projects (sum of lines 01, 02, 03)</td>
<td>241,881</td>
<td>2,444,148</td>
<td>161,397,921</td>
<td>10,014,715</td>
<td></td>
<td></td>
</tr>
<tr>
<td>05</td>
<td>Estimated Unit Months available for old projects for Requested Budget Year.</td>
<td>82,627</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>06</td>
<td>Ratio of Unit months available for old projects (line 04 divided by line 03 column 3)</td>
<td>3</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>07</td>
<td>Estimated UMA and consumption for old projects for Requested Budget Year (Each figure on line 04 divided by line 06).</td>
<td>82,627</td>
<td>814,716</td>
<td>53,765,974</td>
<td>3,338,238</td>
<td></td>
<td></td>
</tr>
<tr>
<td>08</td>
<td>Estimated UMA and consumption for new projects.</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>09</td>
<td>Total estimated UMA and consumption for old and new projects for Requested Budget Year (line 07 + line 08)</td>
<td>82,627</td>
<td>814,716</td>
<td>33,755,974</td>
<td>3,338,238</td>
<td></td>
<td></td>
</tr>
<tr>
<td>10</td>
<td>Estimated cost of consumption on line 09 for Requested Budget Year (see instructions).</td>
<td>COST</td>
<td>9,075,081</td>
<td>3,247,789</td>
<td>3,138,712</td>
<td></td>
<td></td>
</tr>
<tr>
<td>11</td>
<td>Total estimated cost for Requested Budget Year (sum of all columns of line 10)</td>
<td></td>
<td>9,075,081</td>
<td>3,247,789</td>
<td>3,138,712</td>
<td></td>
<td></td>
</tr>
<tr>
<td>12</td>
<td>Est. PUM cost of consumption for Requested Budget Year (Allowable Utilities Expense Level) (line 11 divided by line 09, col 3)</td>
<td>187,61</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>12a</td>
<td>Rate</td>
<td>11.11895</td>
<td>0.56115</td>
<td>0.94023</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>12b</td>
<td>Unit of Consumption</td>
<td>CCF</td>
<td>kW</td>
<td>THERMS</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Line no. (1)</td>
<td>Description (2)</td>
<td>Unit Months Available (3)</td>
<td>Sewerage and Water Consumption (4)</td>
<td>Electricity Energy Consumption (5)</td>
<td>Gas Consumption (6)</td>
<td>Electricity Demand Consumption (7)</td>
<td>Fuel (Specify type e.g., oil, coal, wood)</td>
</tr>
<tr>
<td>-------------</td>
<td>---------------------------------------------------------------------------------</td>
<td>--------------------------</td>
<td>-----------------------------------</td>
<td>----------------------------------</td>
<td>---------------------</td>
<td>-----------------------------------</td>
<td>-------------------------------------------</td>
</tr>
<tr>
<td>01</td>
<td>UMA and actual consumption for old projects for 12 month period which ended 12 months before the Requested Budget Year.</td>
<td>23,076</td>
<td>152,263</td>
<td>13,212,880</td>
<td>594,110</td>
<td></td>
<td></td>
</tr>
<tr>
<td>02</td>
<td>UMA and actual consumption for old projects for 12 month period which ended 24 months before the Requested Budget Year.</td>
<td>23,076</td>
<td>152,263</td>
<td>13,212,880</td>
<td>594,110</td>
<td></td>
<td></td>
</tr>
<tr>
<td>03</td>
<td>UMA and actual consumption for old projects for 12 month period which ended 30 months before the Requested Budget Year.</td>
<td>23,076</td>
<td>152,263</td>
<td>13,212,880</td>
<td>594,110</td>
<td></td>
<td></td>
</tr>
<tr>
<td>04</td>
<td>Accumulate: UMA and actual consumption of old projects sum of lines 01, 02, 03</td>
<td>69,218</td>
<td>483,180</td>
<td>41,375,680</td>
<td>1,602,487</td>
<td></td>
<td></td>
</tr>
<tr>
<td>05</td>
<td>Estimated Unit Months available for old projects for Requested Budget Year.</td>
<td>23,076</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>06</td>
<td>Ratio of Unit months available for old projects (line 04 divided by line 05 column 3)</td>
<td>3</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>07</td>
<td>Estimated UMA and consumption for old projects for Requested Budget Year (Each figure on line 04 divided by line 06).</td>
<td>23,076</td>
<td>161,127</td>
<td>13,792,560</td>
<td>531,712</td>
<td></td>
<td></td>
</tr>
<tr>
<td>08</td>
<td>Estimated UMA and consumption for new projects.</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>09</td>
<td>Total estimated UMA and consumption for old and new projects for Requested Budget Year (line 07 + line 08)</td>
<td>23,076</td>
<td>161,127</td>
<td>13,792,560</td>
<td>531,712</td>
<td></td>
<td></td>
</tr>
<tr>
<td>10</td>
<td>Estimated cost of consumption on line 09 for Requested Budget Year (See instructions).</td>
<td></td>
<td>1,794,782</td>
<td>843,415</td>
<td>502,235</td>
<td></td>
<td></td>
</tr>
<tr>
<td>11</td>
<td>Total estimated cost for Requested Budget Year (sum of all columns of line 10).</td>
<td></td>
<td>3,140,132</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>12</td>
<td>Ext. PUM cost of consumption for Requested Budget Year (Allowable Utilities Expense Level) (line 11 divided by line 09, col. 3)</td>
<td></td>
<td>136.09</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>12a</td>
<td>Rate</td>
<td></td>
<td>111,382</td>
<td>0.0615</td>
<td>0.94023</td>
<td></td>
<td></td>
</tr>
<tr>
<td>12b</td>
<td>Unit of Consumption</td>
<td></td>
<td>CCF</td>
<td>kWh</td>
<td>THERMS</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
### Estimate of Total Required Annual Contributions

#### Section B Housing Assistance Payments Program

- **U.S. Department of Housing and Urban Development**
- **Office of Public and Indian Housing**

**Public Reporting burden** for this collection of information is estimated to average 40 minutes per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Reports Management Officer, Paperwork Reduction Project (2577-0149), Office of Information Technology, U.S. Department of Housing and Urban Development, Washington, D.C. 20410-3610. This agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless that collection displays a valid OMB control number.

---

**Housing Authority of the City of Atlanta, Georgia**

- **230 John Wesley Dobbs Boulevard**
- **Atlanta, Georgia 30303**

**2. Project No.**

GADV0006013020

**3. Submission**

- Original
- Revision No.

**4. Annual Contributions Contract No.**

A-3910V

**5. HUD Field Office**

Atlanta, GA

**6. HUD Regional Office**

Atlanta, GA

**7. No. Dwelling Units**

3,421

**8. No. Units Months**

41,052

**9. Housing Program Type (Mark One)**

- (a) New Construction
- (b) Substantial Rehabilitation
- (c) Moderate Rehabilitation
- (d) Existing Housing Certificates
- (e) Housing Vouchers

**10. FHA Fiscal Year Ending Date (Mark one and complete year)**

- (a) March 31, X
- (b) June 30, 
- (c) September 30, 
- (d) December 31, 2005

**11. Maximum Annual Contributions Commitment**

<table>
<thead>
<tr>
<th>PHA Estimate (Housing Vouchers Only)</th>
<th>HUD Approved (Housing Vouchers Only)</th>
</tr>
</thead>
<tbody>
<tr>
<td>PHA Fee</td>
<td>HUD Approved Total</td>
</tr>
<tr>
<td>Housing Payments</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Contributions</th>
<th>PHA Fee</th>
<th>HUD Approved Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>36,977,539</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**12. Prorata Maximum Annual Contributions Applicable to a Period in Excess of 12 months**

2,336,066

**13. Maximum Annual Contributions for Fiscal Year**

39,313,605

**14. Project Account Estimated or Actual Balance at Beginning of Requested Fiscal Year**

2,981,835

**15. Total Annual Contributions Available Estimated or Actual**

42,295,440

---

**Note:**

This calculation represents only those vouchers excluded from the MTW Block Grant.
### II. Maximum Annual Contributions

<table>
<thead>
<tr>
<th>Description</th>
<th>PHA Estimate</th>
<th>HUD Approved</th>
</tr>
</thead>
<tbody>
<tr>
<td>Housing Payments PHA Fee</td>
<td></td>
<td></td>
</tr>
<tr>
<td>18. Estimated Annual Housing Assistance Payments (form HUD-52672, Line 15)</td>
<td>38,977,539</td>
<td></td>
</tr>
<tr>
<td>17. Estimated Ongoing Administrative Fee (form HUD 52672, Line 18)</td>
<td>2,338,066</td>
<td></td>
</tr>
<tr>
<td>16. Estimated Hard-to-House Fee (form HUD 52672, Line 18)</td>
<td>151,650</td>
<td></td>
</tr>
<tr>
<td>19. Estimated Independent Public Accountant Audit Costs</td>
<td>45,000</td>
<td></td>
</tr>
<tr>
<td>Conversion Fees</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Special Fees</td>
<td>247,750</td>
<td></td>
</tr>
<tr>
<td>22. Family Self Sufficiency Coordinators Administrative Salaries</td>
<td></td>
<td></td>
</tr>
<tr>
<td>23. Carryover of Non-Expansible Equipment Expense not Expended in the Previous FY Ending: (if applicable)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>24. Total Annual Contributions Required-Requested Fiscal Year (Lines 16 through 23)</td>
<td>39,959,492</td>
<td>39,959,492</td>
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<tr>
<td>25. Deficit at End of Current Fiscal Year-Estimated or Actual</td>
<td>0</td>
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<tr>
<td>26. Total Annual Contributions Required (Line 24 plus Line 25)</td>
<td>39,959,492</td>
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</tr>
<tr>
<td>27. Estimated Project Account Balance at End of Requested Fiscal Year (Line 15 minus Line 26)</td>
<td>0</td>
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</tr>
<tr>
<td>28. Provision for Project Account-Requested Fiscal Year Increase (decrease)</td>
<td>(2,581,835)</td>
<td></td>
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</tbody>
</table>

### III. Annual Contributions Approved

<table>
<thead>
<tr>
<th>Description</th>
<th>PHA Estimate</th>
<th>HUD Approved</th>
</tr>
</thead>
<tbody>
<tr>
<td>Housing Payments PHA Fee</td>
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<tr>
<td>29.</td>
<td>39,959,492</td>
<td></td>
</tr>
</tbody>
</table>

### Source of Total Contributions Approved-Requested Fiscal Year:

(a) Requested Fiscal Year Maximum Annual Contributions Commitment (Line 13 or Line 29, whichever is smaller)

(b) Project Account (Line 29 minus Line 30(a))

645,887

Signature, Name and Title of PHA Approving Official (and date)

Signature, Name and Title of Approving HUD Field Office Official (and date)

Renee Lewis Glover,
President and CEO

29-Mar-04

Previous editions are obsolete

Submit Original and 2 copies

Page 2 of 2

Handbook 7420.7
Supporting Data for Annual Contributions Estimates
Section 8 Housing Assistance Payments Program

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing

Housing Authority of the City of Atlanta, Georgia
230 John Wesley Dobbs Boulevard
Atlanta, Georgia 30303

Do not send this form to the above address.

1. Public Housing Agency (Name and Address)

2. Project No.

3. Submission

4. No. of Dwelling Units

5. No. of Unit Months

<table>
<thead>
<tr>
<th>Part I Estimate of Annual Housing Assistance Payments</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Bedroom Size of Dwelling Units</td>
<td>Number of Dwelling Units</td>
</tr>
<tr>
<td>1 BR</td>
<td>243</td>
</tr>
<tr>
<td>2 BR</td>
<td>994</td>
</tr>
<tr>
<td>3 BR</td>
<td>1,098</td>
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<tr>
<td>4 BR</td>
<td>1,014</td>
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<tr>
<td>5 BR</td>
<td>1,025</td>
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<tr>
<td>Total</td>
<td>3,421</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Part II Calculation of Estimated Administrative Fee</th>
</tr>
</thead>
<tbody>
<tr>
<td>Unit Months</td>
</tr>
<tr>
<td>Ongoing Administrative</td>
</tr>
<tr>
<td>Fee</td>
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<tr>
<td>Total</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Part III Calculation of Estimated Hard-to-House Fee</th>
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</thead>
<tbody>
<tr>
<td>Estimated Number of Families</td>
</tr>
<tr>
<td>(a)</td>
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<tr>
<td>2022</td>
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</table>

<table>
<thead>
<tr>
<th>Part IV Calculation of Estimated Preliminary Expenses</th>
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</thead>
<tbody>
<tr>
<td>Administrative Expenses:</td>
</tr>
<tr>
<td>20. Special Fees &amp; FSS Coordinators Administrative Salaries</td>
</tr>
<tr>
<td>21. Employee Benefit Contributions</td>
</tr>
<tr>
<td>22. Legal Expenses</td>
</tr>
<tr>
<td>23. Travel Expenses</td>
</tr>
<tr>
<td>24. Sundries</td>
</tr>
<tr>
<td>25. Office Rent</td>
</tr>
<tr>
<td>26. Accounting and Auditing Fees</td>
</tr>
<tr>
<td>27. Total Administrative Expenses</td>
</tr>
<tr>
<td>Non-Expansible Equipment Expenses:</td>
</tr>
<tr>
<td>28. Office Equipment</td>
</tr>
<tr>
<td>29. Office Furnishings</td>
</tr>
<tr>
<td>30. Automotive</td>
</tr>
<tr>
<td>31. Other</td>
</tr>
<tr>
<td>32. Total Non-Expansible Equipment Expenses</td>
</tr>
<tr>
<td>General Expenses:</td>
</tr>
<tr>
<td>33. Maintenance and Operation (Non-Expansible, Equip. Only)</td>
</tr>
<tr>
<td>34. Insurance</td>
</tr>
<tr>
<td>35. Sundries</td>
</tr>
<tr>
<td>36. Total General Expenses</td>
</tr>
<tr>
<td>Total Preliminary Expenses</td>
</tr>
</tbody>
</table>

Submit three copies

Previous editions are obsolete

Page 1 of 1 form HUD-50872 (2/95) ref Handbook 7409.1
Requisition for Partial Payment of Annual Contributions
Section 8 Housing Assistance Payments Program

Public reporting burden for this collection of information is estimated to average 1.5 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Reports Management Officer, Paperwork Reduction Project (2577-0146), Office of Information Technology, U.S. Department of Housing and Urban Development, Washington, D.C. 20410-3600. This agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a valid OMB control number.

Do not send this form to the above address.

1. Date of Requisition: 29-Mar-04
2. No. of Months in 1st FY: 12
3. Project No.: GA0600813020
4. Public Housing Agency (PHA) (Name and Address): Housing Authority of the City of Atlanta, Georgia 230 John Wesley Dobbs Boulevard Atlanta, Georgia 30303
5. Housing Program Type (Mark One):
   - (a) New Construction
   - (b) Substantial Rehabilitation
   - (c) Moderate Rehabilitation
   - (d) Existing Housing Certificates
   - (x) Housing Vouchers
6. HA Fiscal Year Ending Date (Mark one box and complete year):
   - (a) March 31
   - (b) June 30
   - (c) September 30
   - (d) December 31
   - (x) 2005
7. Number of Units Under Lease to Eligible Families as of Date of Requisition: 2,500
8. Average Monthly Housing Assistance Payment Per Unit as of Date of Requisition: 724
9. Estimated Number of Units to Be Under Lease at End of Requested Year: 3,421
10. Unit Months Under Lease Year to Date: 41,052
11. Average Monthly Housing Assistance Payment Per Unit Year to Date: 724
12. Special Fees & Family Self-Sufficiency Contributions Administrative Salaries:

<table>
<thead>
<tr>
<th>Installment</th>
<th>1</th>
<th>2</th>
<th>3</th>
<th>4</th>
<th>5</th>
<th>6</th>
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<tbody>
<tr>
<td>HUD Revision</td>
<td>7</td>
<td>8</td>
<td>9</td>
<td>10</td>
<td>11</td>
<td>12</td>
</tr>
<tr>
<td>HUD Revision</td>
<td>7</td>
<td>8</td>
<td>9</td>
<td>10</td>
<td>11</td>
<td>12</td>
</tr>
<tr>
<td>Total (HA)</td>
<td>38,959,492</td>
<td>38,959,492</td>
<td>38,959,492</td>
<td>38,959,492</td>
<td>38,959,492</td>
<td>38,959,492</td>
</tr>
</tbody>
</table>

I certify that (1) housing assistance payments have been or will be made only in accordance with Housing Assistance Payments Contracts or Housing Voucher contracts in the form prescribed by HUD and in accordance with HUD regulations and requirements; (2) units have been inspected by the HA in accordance with HUD regulations and requirements; and (3) this requisition for annual contributions has been examined by me and to the best of my knowledge and belief is true, correct and complete.

Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1018, 1912; 31 U.S.C. 3728, 3730)

Title of Authorized HA Official: Renee Lewis Glover, President and CEO
Title of Authorized HUD Approving Official:

Date: 29-Mar-04
Signature: [Signature]

Form HUD-52663 (9/04)
Ref Handbook 7420.7
Preceding sections are obsolete
### Annual Statement / Performance and Evaluation Report

**Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF) Part 1: Summary**

<table>
<thead>
<tr>
<th>PHA Name</th>
<th>Grant Type and Number</th>
<th>Capital Fund Program Grant No:</th>
<th>Replacement Housing Factor Grant No:</th>
<th>Federal FY of Grant:</th>
</tr>
</thead>
<tbody>
<tr>
<td>The Housing Authority of the City of Atlanta, Georgia</td>
<td>G08R00650104 (Estimated)</td>
<td>2004</td>
<td></td>
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</tbody>
</table>

#### Performance and Evaluation Report for Program Year Ending

<table>
<thead>
<tr>
<th>Line No.</th>
<th>Summary by Development Account</th>
<th>Total Estimated Cost</th>
<th>Revised</th>
<th>Obligated</th>
<th>Total Actual Cost</th>
<th>Expended</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Total non-CFP Funds</td>
<td>$0.00</td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>2</td>
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<tr>
<td>3</td>
<td>1408 Management Improvements Soft Costs</td>
<td>$0.00</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>4</td>
<td>1410 Management Improvements Hard Costs</td>
<td>$0.00</td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>5</td>
<td>1411 Administration</td>
<td>$0.00</td>
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<td></td>
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</tr>
<tr>
<td>6</td>
<td>1415 Liquidated Damages</td>
<td>$0.00</td>
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<tr>
<td>7</td>
<td>1430 Fees and Costs</td>
<td>$0.00</td>
<td></td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>8</td>
<td>1440 Site Acquisition</td>
<td>$0.00</td>
<td></td>
<td></td>
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<td></td>
</tr>
<tr>
<td>9</td>
<td>1450 Site Improvement</td>
<td>$0.00</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>10</td>
<td>1460 Dwelling Structures</td>
<td>$0.00</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>11</td>
<td>1485.1 Dwelling Equipment - Non expendable</td>
<td>$0.00</td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>12</td>
<td>1470 Nondwelling Structure</td>
<td>$0.00</td>
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<td></td>
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</tr>
<tr>
<td>13</td>
<td>1475 Nondwelling Equipment</td>
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</tr>
<tr>
<td>14</td>
<td>1485 Demolition</td>
<td>$0.00</td>
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<td></td>
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<tr>
<td>15</td>
<td>1490 Replacement Reserve</td>
<td>$0.00</td>
<td></td>
<td></td>
<td></td>
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</tr>
<tr>
<td>16</td>
<td>1492 Moving to Work Demonstration</td>
<td>$6,230,000.00</td>
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<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>17</td>
<td>1485.1 Relocation Costs</td>
<td>$0.00</td>
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<tr>
<td>18</td>
<td>1499 Development Activities</td>
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<tr>
<td>19</td>
<td>1602 Contingency</td>
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<tr>
<td>20</td>
<td>Amount of Annual Grant (Sum of lines 2-19)</td>
<td>$6,230,000.00</td>
<td>$0.00</td>
<td>$0.00</td>
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<td></td>
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<tr>
<td>21</td>
<td>Amount of line 20 Related to LBP Activities</td>
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<td></td>
<td></td>
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<tr>
<td>22</td>
<td>Amount of line 20 Related to Section 504 Compliance</td>
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<tr>
<td>23</td>
<td>Amount of line 20 Related to Security - Soft Costs</td>
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<tr>
<td>24</td>
<td>Amount of line 20 Related to Security - Hard Costs</td>
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<td>25</td>
<td>Amount of line 20 Related to Energy Conservation Measures</td>
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<td>26</td>
<td>Collateralization Expenses or Debt Service</td>
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</tr>
<tr>
<td>Development Number/Name HA-wide</td>
<td>General Description of Major Work Categories</td>
<td>Dev. Acct. No.</td>
<td>Quantity</td>
<td>Total Estimated Cost</td>
<td>Total Actual Cost</td>
<td>Funds</td>
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<tr>
<td>---------------------------------</td>
<td>-----------------------------------------------</td>
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<td>----------</td>
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<tr>
<td>GA#-003 203- Grady Homes Moving to Work</td>
<td></td>
<td>1492</td>
<td></td>
<td>8,230,000</td>
<td></td>
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</tr>
</tbody>
</table>
## Annual Statement / Performance and Evaluation Report
### Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF)
#### Part III: Implementation Schedule

<table>
<thead>
<tr>
<th>PHA Name</th>
<th>Grant Type and Number</th>
<th>Federal FY of Grant</th>
</tr>
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<tbody>
<tr>
<td>The Housing Authority of the City of Atlanta, Georgia</td>
<td>Capital Fund Program Grant No: GA06R00650104 (Estimated)</td>
<td>2004</td>
</tr>
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</table>

<table>
<thead>
<tr>
<th>Development Number/Name HA-wide Activities</th>
<th>All Funds Obligated (Quarter Ending Date)</th>
<th>All Funds Expended (Quarter Ending Date)</th>
<th>Reasons for Revised Target Dates</th>
</tr>
</thead>
<tbody>
<tr>
<td>GAA-003 203- Grady Homes</td>
<td>Original Revised Actual</td>
<td>Original Revised Actual</td>
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<tr>
<td></td>
<td>8/30/2007</td>
<td>6/30/2009</td>
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</tbody>
</table>
### Annual Statement / Performance and Evaluation Report

**Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF) Part 1: Summary**

**The Housing Authority of the City of Atlanta, Georgia**

<table>
<thead>
<tr>
<th>Line No.</th>
<th>Summary by Development Account</th>
<th>Original Total Estimated Cost</th>
<th>Revised</th>
<th>Obligated</th>
<th>Total Actual Cost</th>
<th>Expended</th>
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<tbody>
<tr>
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<tr>
<td>2</td>
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<tr>
<td>3</td>
<td>1408 Management Improvements Soft Costs</td>
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<td>4</td>
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</tr>
<tr>
<td>8</td>
<td>1440 Site Acquisition</td>
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<tr>
<td>9</td>
<td>1450 Site Improvement</td>
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<tr>
<td>10</td>
<td>1460 Dwelling Structures</td>
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<tr>
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<tr>
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<tr>
<td>14</td>
<td>1485 Demolition</td>
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</tr>
<tr>
<td>15</td>
<td>1490 Replacement Reserve</td>
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</tr>
<tr>
<td>16</td>
<td>1482 Moving to Work Demonstration</td>
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<tr>
<td>17</td>
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<tr>
<td>19</td>
<td>1502 Contingency</td>
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<td></td>
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<tr>
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<td>Amount of Annual Grant (Sum of lines 2-19)</td>
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<td>$0.00</td>
<td>$0.00</td>
<td>$0.00</td>
<td>$0.00</td>
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<tr>
<td>21</td>
<td>Amount of line 20 Related to LBP Activities</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>22</td>
<td>Amount of line 20 Related to Section 504 Compliance</td>
<td></td>
<td></td>
<td></td>
<td></td>
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<td>23</td>
<td>Amount of line 20 Related to Security - Soft Costs</td>
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<td>Amount of line 20 Related to Security - Hard Costs</td>
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<td>Amount of line 20 Related to Energy Conservation Measures</td>
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<td>26</td>
<td>Collateralization Expenses or Debt Service</td>
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</table>
## Annual Statement / Performance and Evaluation Report
### Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPCHF)
#### Part II: Supporting Pages

<table>
<thead>
<tr>
<th>PHA Name</th>
<th>General Description of Major Work Categories</th>
<th>Dev. Acct. No.</th>
<th>Quantity</th>
<th>Total Estimated Cost</th>
<th>Total Actual Cost</th>
<th>Funds Obligated</th>
<th>Funds Expended</th>
<th>Status of Work</th>
</tr>
</thead>
<tbody>
<tr>
<td>The Housing Authority of the City of Atlanta, Georgia</td>
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<td></td>
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<tr>
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<td>Moving to Work</td>
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<td>12,824,017</td>
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Federal FY of Grant: 2004

Capital Fund Program Grant No: GA06P00550104 (Estimated)

Replacement Housing Factor Grant No:
### Annual Statement / Performance and Evaluation Report
#### Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF)

### Part III: Implementation Schedule

<table>
<thead>
<tr>
<th>PHA Name</th>
<th>Grant Type and Number</th>
<th>Federal FY of Grant:</th>
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<tr>
<td>The Housing Authority of the City of Atlanta, Georgia</td>
<td>Capital Fund Program Grant No:</td>
<td>2004</td>
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<tr>
<td>Replacement Housing Factor Grant No GA06R00650104 (Estimated)</td>
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<table>
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<tr>
<th>Development Number/ Name HA-wide Activities</th>
<th>All Funds Obligated (Quarter Ending Date)</th>
<th>All Funds Expended (Quarter Ending Date)</th>
<th>Reasons for Revised Target Dates</th>
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</thead>
<tbody>
<tr>
<td></td>
<td>Original</td>
<td>Revised</td>
<td>Actual</td>
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</table>
Resident Consultation and Public Comments:

The Moving To Work (MTW) Annual Plan is the product of an inclusive and comprehensive planning process involving numerous hours of planning and consultation with Atlanta Housing Authority’s (AHA) Board of Commissioners and senior management team, AHA’s private development and management partners, Resident Association presidents, AHA Advisory Board groups, residents of AHA’s affordable housing communities, Housing Choice participants, AHA’s management staff, the Georgia Law Center for the Homeless, Atlanta Legal Aid Society and other members of the public. AHA provided draft copies of the plan for feedback to most of these stakeholders and also conducted comprehensive presentations on selected components of the MTW Annual Plan including the four demonstration initiatives described in Part II of this plan. Valuable comments and suggestions were made at those various meetings, many of which have been incorporated into the MTW Annual Plan. The scheduled consultation meetings were as follows:

<table>
<thead>
<tr>
<th>NAME OF ORGANIZATION</th>
<th>MEETING DATE</th>
</tr>
</thead>
<tbody>
<tr>
<td>AHA Board of Commissioners</td>
<td>One-on-one Briefings held June 1 – June 4, 2004</td>
</tr>
<tr>
<td>Georgia Law Center for the Homeless and Atlanta Legal Aid Society</td>
<td>June 3, 2004</td>
</tr>
<tr>
<td>AHA Jurisdiction-Wide Resident Council</td>
<td>June 7, 2004</td>
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<tr>
<td>Community Group Briefing:</td>
<td>June 7, 2004</td>
</tr>
<tr>
<td>o Advisory Board for the Affordable Housing Initiative for Seniors and Persons with Disabilities</td>
<td></td>
</tr>
<tr>
<td>o PHADD (Public Housing Advocacy for Diversity and Disability)</td>
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<tr>
<td>o POSSE (Positive Opportunities Serving Seniors Everywhere)</td>
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</tr>
<tr>
<td>o Good Neighbor Program Advisory Committee</td>
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</tr>
<tr>
<td>o Housing Choice Program Resident Advisory Board</td>
<td></td>
</tr>
<tr>
<td>Public Hearing</td>
<td>June 9, 2004</td>
</tr>
</tbody>
</table>

Summary of Comments:

The following is a summary of primary concerns and questions raised during the consultation sessions identified above:
General Comments

- Specific comment from some of the participants included:
  - “Great Ideas! It’s good to see the program come to fruition.”
  - “The policies are good (although there may be challenges) and will assist persons in moving to the next level.”
  - “This is a great plan. Looking forward to partnering with AHA to possibly provide life skills, training, etc.”
  - “Impressed with the information presented. Would like to help out in any way possible to help better the community.”

Crime and Criminal History Screening

- Residents expressed support for the criminal history screening provisions that ban persons with involvement in certain levels of crime from AHA properties for certain periods of time based on severity level of the crime. Residents felt these new provisions helped to protect them from unsuitable and potentially dangerous neighbors.

- Atlanta Legal Aid and the Georgia Law Center for the Homeless were also generally supportive of the criminal history screening policy. They urged AHA to give more consideration to mitigating circumstances and rehabilitation than HUD regulations require. AHA assured them that AHA would adhere to the requirements of the HUD regulations with respect to giving applicants and residents facing denial or termination notice of the reasons for the adverse action and an opportunity to dispute the accuracy and relevance of the information.

- Atlanta Legal Aid and the Georgia Law Center for the Homeless also raised concerns about the length of the banning periods. In response, AHA senior management discussed the high level of resident anxiety about criminal activity in their communities and the criminal backgrounds of their neighbors. Senior management also explained that the length of the ban periods was appropriate given the violent and drug-related nature of the crimes associated with the longer ban periods.
**Elderly/Disabled**

- A concern was raised that AHA may not admit families with SSI or other forms of income not generated from current employment. AHA staff clarified that such elderly and disabled clients were not prohibited from applying. AHA staff explained that qualifying elderly and disabled families actually receive top preference consideration for admission to AHA communities. AHA staff also noted that the elderly and the disabled (who are verifiably unable to work) are exempt from the work requirement.

- One of the AHA Board of Commissioners, Ms. Eva Davis, recommended an income disregard of employment income of elderly clients on fixed government entitlement income such as SSI and social security. She also recommended that AHA consider exempting elderly and disabled clients on fixed government entitlement income from the minimum rent increase. These suggestions have been incorporated into the MTW Plan and the Statement of Corporate Policies.

- Participants raised concerns about mixing elderly and young mentally disabled residents. They were particularly concerned about the lack of services to assist the mentally disabled to live independently and take their medicines. AHA addressed these concerns in the MTW Plan, i.e. percentage based mixed-population and elderly/almost elderly admissions ratio, and a strategy to invite developer proposals for service-enriched housing for seniors and persons with disabilities.

**IDA Accounts**

- Meeting attendees recommended that AHA establish interest-bearing IDA accounts for families. AHA staff informed clients that AHA is investigating interest-bearing IDA opportunities as well as opportunities to secure matching funds from various sources.

- There were also inquiries as to why clients could not establish their own savings accounts versus AHA. AHA staff encouraged clients to establish their own savings accounts. AHA staff clarified that AHA is diverting a portion of the rent otherwise payable to AHA as a benefit into an IDA account for clients. AHA staff also explained that clients who meet certain economic independence benchmarks as defined by AHA will be able to access these funds for homeownership, education, and emergencies approved by AHA.
**Housing Subsidy**

- Participants raised questions about the sustainability of Section 8 subsidy versus Section 9 subsidy. AHA staff clarified that appropriations for both programs are made on an annual basis; therefore, both are subjective to national priorities and decision-making. However, AHA believes that the Section 8 program has broader support from the private sector development community and other private sector entities.

**Work Requirement**

- The consultation groups recommended that AHA identify sufficient community resources to support single parents who will be required to work. The support should specifically identify affordable childcare and transportation assistance. AHA staff agreed and also noted that working families may receive deductions for childcare expenses as it relates to determining their rents.

- Will children 16 and 17 be required to work? AHA staff clarified that children 16 and 17 who have dropped out of school will be required to work.

- The groups encouraged AHA to address the needs of clients who may be in school or training full-time and may not have developed the skills to secure employment.

These comments were very helpful to AHA staff in the development of the MTW Plan. Many of the policy related concerns were addressed in AHA’s MTW Plan. Concerns related to the implementation of MTW demonstration initiatives will be considered as we move forward with implementation.

**Public Hearing:**

AHA held a Public Hearing on Wednesday, June 9, 2004, to present AHA’s Fiscal Year 2005 Moving To Work (MTW) Annual Plan and Statement of Corporate Policies Governing the Leasing and Residency of Assisted Apartments and to receive comments from residents, participants, and the general public. The Public Hearing was held at the Fulton County Government Center located at 141 Pryor Street, Atlanta, Georgia 30303. Public Notice was given in the Atlanta Journal and Constitution on May 23, 2004. In addition, AHA mailed a letter of notification to all Public Housing
and Housing Choice residents informing them of the Public Hearing and offering transportation or transportation reimbursement. Every AHA Public Housing community, as well as AHA’s mixed-income, mixed-finance communities, posted the Public Notice in the management office where it could be easily viewed by residents.

The Public Hearing was conducted by AHA Board of Commissioner James Brown. AHA’s President and Chief Executive Officer and senior management team participated in the presentation. A power point slide presentation was used as a visual aid and a sign language interpreter interpreted for the hearing impaired attendees. Over 300 people attended the Public Hearing. In addition, AHA will be visiting each of its communities during the fiscal year to brief all residents on the FY 2005 MTW Annual Plan and the Statement of Corporate Policies Governing the Leasing and Residency of Assisted Apartments.

At the close of the Public Hearing, an open forum was held to allow audience participants the opportunity to ask questions or make comments on AHA’s FY 2005 MTW Annual Plan and the Statement of Corporate Policies Governing the Leasing and Residency of Assisted Apartments. Many of the questions asked related to the proposed work requirement and how it impacts the elderly, persons with children, students, and persons under the age of 18. Concerns were raised regarding affordable childcare, transportation assistance, and other support systems for single mothers going to work. A couple of questions arose regarding the criminal history screening as it relates to previous felony convictions. The written comments included concerns about raising the minimum rent, addressing crime in communities, and property maintenance related issues. In an effort to readily address resident concerns, residents relaying personal or specific issues were assisted by AHA’s staff during and immediately after the open comment session.
Atlanta Housing Authority (the “PHA”)
Moving To Work (MTW) Demonstration Program
Certifications for FY 2005 MTW Annual Plan

1. The PHA held a public hearing regarding the Plan on June 9, 2004.
2. The PHA Board of Commissioners approved a resolution adopting the MTW Plan.
3. The PHA will carry out the Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, Title II of the Americans with Disabilities Act of 1990, and all applicable nondiscrimination and equal opportunity requirements set forth in 24 CFR 5.105(a), and will administer its programs and activities in a manner affirmatively to further fair housing.
4. The PHA shall continue to comply with Section 18 of the 1937 Act (42 U.S.C. 1437p, as amended by Section 1002(d) of Public Law 104-19, Section 201(b)(1) of Public Law 104-134, and Section 201(b) of Public Law 104-202), governing demolition and disposition, notwithstanding any use of the housing under MTW.
5. The PHA shall continue to comply with Section 12 of the 1937 Act (42 U.S.C. 1437j), governing wage rates.
6. The PHA shall continue to comply with the requirements of Section 16(a)(3) of the 1937 Act (as amended), and as required by the 1996 Appropriations Act, the PHA agrees that at least seventy-five percent (75%) of the families assisted by the PHA under the MTW demonstration program will be very low-income families as defined in the 1937 Act.
7. The PHA agrees to continue to assist substantially the same total number of eligible low-income families under MTW, and to maintain a comparable mix of families by family size, as would have been served or assisted if HUD funding sources had not been used under the MTW demonstration.
8. The PHA agrees that housing assisted under MTW will meet housing quality standards established or approved by HUD.
9. The PHA agrees that it will comply with the terms of any applicable court orders or Voluntary Compliance Agreements that are in existence or may come into existence during the term of the MTW Agreement.
10. If applicable to activities under the PHA’s MTW Agreement, the PHA agrees to provide HUD with any documentation that HUD needs to carry out its review under the National Environmental Policy Act (NEPA) and other related authorities and otherwise will assist HUD in complying with 24 CFR Part 50 environmental review procedures. The PHA further agrees to comply with related provisions of Article I, Section J of the MTW Agreement.
11. In relation to rent policies, the PHA certifies that:
   - The PHA Board approves of this policy and has approved the required analysis of the impact of such policies specified in Article I, Section I of the MTW Agreement and
   - The PHA is in compliance with all provisions of that section.

12. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.


14. The PHA will comply with the requirements of Section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low- or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.

15. The PHA has submitted with the Plan a certification with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.

16. The PHA has submitted with the Plan a certification with regard to compliance with restrictions on lobbying required by 24 CFR Part 87, together with disclosure forms if required by this Part, and with restrictions on payments to influence Federal Transactions, in accordance with the Byrd Amendment and implementing regulations at 49 CFR Part 24.

17. The PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.

18. The PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.

19. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.

20. The PHA will comply with the policies, guidelines, and requirements of OMB Circular No. A-87 (Cost Principles for State, Local and Indian Tribal Governments) and 24 CFR Part 85 (Administrative Requirements for Grants and Cooperative Agreements to State, Local and Federally Recognized Indian Tribal Governments), as may be modified by the PHA’s MTW Agreement.

21. The PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and the MTW Agreement executed by the PHA and HUD and will utilize funds made available under the Capital Fund, Operating Fund and Section 8 tenant-based assistance only for activities that are allowable under applicable regulations as modified by the PHA’s MTW Agreement and included in its Plan.

Certified by: ____________________________ Date: _________
Board of Commissioners Chairperson