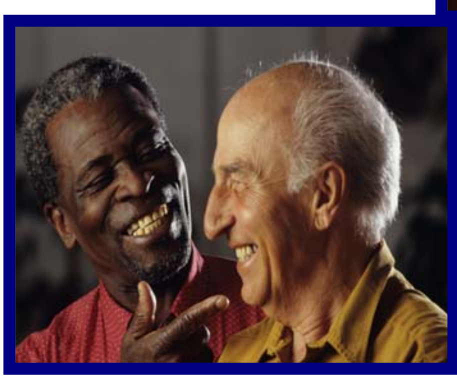
# Atlanta Housing Authority
# FY 2008 CATALYST Implementation Plan
**(Board Approved)**



***"Healthy Mixed-Income Communities"***

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## Message from the President and Chief Executive Officer

The Atlanta Housing Authority (AHA) continues to make tremendous progress in achieving its vision of "Healthy Mixed-Income Communities." AHA and its private sector development partners have repositioned 12 distressed public housing communities and created 12 master planned mixed-use, mixed-income communities. To date, over 1,300 acres of land in the City of Atlanta have been redeveloped with an economic impact of approximately $3 billion. In conjunction with this revitalization activity, over 6,000 AHA-assisted families have been relocated and are now residing in better neighborhoods.

Even so, there is still more work to be done. Currently approximately 5,000 residents, half of which are children, still reside in economically and socially detrimental conditions of concentrated poverty inside of AHA's remaining obsolete public housing family communities. Continuous declines in federal funding further exacerbate AHA's ability to address these housing conditions. Given the "window of opportunity" created by AHA's MTW Agreement and the robust Atlanta real estate market, the time is right for AHA to advance our efforts in addressing these remaining communities. Over the next three years, AHA will use its MTW flexibility to relocate all of these families from the detrimental conditions of concentrated poverty into better neighborhoods. During the relocation process and for two years thereafter, affected families will be supported by human development professionals so that families can be successful in achieving their goals for better and more productive lives.

AHA will continue to implement community building strategies that build upon the lessons learned in creating opportunities for low-income families to live in healthy mixed-use, mixed-income communities. We will continue to create mixed-use, mixed-income, mixed-finance developments, in partnership with private sector developers, by leveraging HUD development funds, operating subsidies and AHA-owned land, using market principles to create market competitive communities with a seamless affordable component. We will continue to enforce higher standards promoting personal responsibility and successful outcomes among AHA-assisted families. We will strengthen our partnerships with Atlanta Public Schools, HUD, City of Atlanta, Fulton County Government, community service providers, other community stakeholders, and AHA-assisted families.

The FY 2008 Implementation Plan outlines our strategic approach for improving the quality of life and neighborhoods in Atlanta.

Renée Lewis Glover
President & Chief Executive Officer

## Message from the Chairman of the AHA Board of Commissioners

The Atlanta Housing Authority continues to deliver on its promises to our residents and our stakeholders. The goals we set for the 2007 fiscal year are being met — and exceeded! The 2008 fiscal year promises more of the same — but at an even higher level of performance because we once again have raised the bar for our own success.

This coming fiscal year will be the fifth in our seven year commitment under Moving to Work. As part of that commitment, the Authority will continue to implement four major initiatives as outlined in its Business Plan established in FY 2005:

- Transform all of our public housing communities to market rate, mixed-income communities
- Expand the use of housing choice vouchers to allow our families to live where they want
- Provide even better housing to our senior and disabled residents
- Strengthen our community-building policies to transform our housing to be more than just shelter

To execute on those ambitions, we have organized the Authority so that discipline, responsibility, and accountability are institutionalized. Our President, Renée Glover, and her magnificent staff have created a structure and systems that will deliver quality housing and services for our residents, empower our employees, and charge our executives to perform at a level that exceeds our already lofty expectations.

Words cannot describe the transformation of public housing in Atlanta, Georgia. The “before” and “after” pictures of our communities tell the tale of the physical transformation. Even more convincing are the “before” and “after” photographs and testimonies of our residents who lived (and now live) with us. An oral history of and by our residents is as uplifting as the most eloquent public speech.

None of this has been easy. What is to come won’t be easy either. The traditional sources of money for public housing continue to diminish rapidly. The other demands on the country’s public financial resources continue to relegate public housing practically to “orphan” status. No matter. That has been true for more than a decade, but the Atlanta Housing Authority has proven itself capable of reaching beyond its grasp to imagine and achieve communities that are the pride of their neighborhoods. That will continue in 2008, we promise you.

Cecil Phillips
Chairman, AHA Board of Commissioners

# INTRODUCTION

Atlanta Housing Authority (AHA), an affordable housing provider, determined with the initiation of the revitalization of Techwood/Clark Howell in the fall of 1994 that warehousing poor families in isolated barrack-style buildings was detrimental and perpetuated the cycle of poverty. The social, financial and human costs of concentrating poverty have been devastating to families, the City of Atlanta, and society, as a whole. AHA believes that the better solution is to provide affordable housing seamlessly in market competitive, mixed-income communities. Through its strategic revitalization program (Olympic Legacy Program), AHA's approach has demonstrated that families fare better economically and socially when they are given an opportunity to move away from concentrated poverty and into healthy mixed-income communities.

## Vision

Healthy mixed-income communities.

## Mission

To provide quality affordable housing for the betterment of the community.

## Guiding Principles

1. End the practice of concentrating the poor in distressed, isolated neighborhoods
2. Create healthy communities using a holistic and comprehensive approach to assure long-tern marketability and sustainability of the community and to support excellent outcomes for families especially the children – emphasis on excellent, high performing neighborhood schools and excellent quality of life amenities, such as first class retail and green space.
3. Create mixed-income communities with the goal of creating market competitive communities with a seamless affordable component.
4. Develop communities through public/private partnerships using public and private sources of funding and market principles.
5. Residents should be supported with adequate resources to assist them to achieve their life goals, focusing on self-sufficiency and educational advancement of the children. Expectations and standards for personal responsibility should be benchmarked for success.

## Goals

1. Quality Living Environments - Provide quality affordable housing in healthy mixed-income communities with access to excellent quality of life amenities.

2. Economic Viability - Maximize AHA's economic viability and sustainability.

3. Self-Sufficiency - Facilitate opportunities for families and individuals to build wealth and reduce their dependency on subsidy, ultimately becoming financially independent.

## AHA Business Lines

AHA has established four business lines that are the agency's core competencies for implementing its business plan activities and achieving its corporate objectives. AHA is continuing to re-align and strengthen its corporate infrastructure, financial and reporting systems, information technology environment, and human resources to support its business lines. These activities are described as ***Corporate Support***. The following pages contain descriptions of these business lines including their overall purpose and strategic direction.

## REAL ESTATE MANAGEMENT

The Real Estate Management (REM) business line is responsible for overseeing the property management of AHA's conventional public housing communities by professional property management companies (PMCOs); providing real estate technical services; and facilitating linkages to job training opportunities and other services provided by third party professional organizations for AHA-assisted families. AHA, as the owner, articulates its goals and objectives to the PMCOs through REM. As of June 30, 2006, AHA owned 6,433[1] units in 17 high-rise communities which serve the elderly and disabled and 14 family communities in its conventional public housing portfolio. Three of the 17 high-rise communities are in pre-development (Antoine Graves, Graves Annex and M.L. King, Jr. Towers) and one is in development (John O. Chiles) as part of the HOPE VI revitalization of three family communities (Grady Homes, McDaniel Glenn, and Harris Homes, respectively). In addition, one of the remaining 14 family communities is undergoing revitalization (McDaniel Glenn) and one is in pre-development (University Homes). (See **Appendix B** for a list of these properties.)

**Strategic Direction.** Since 2001, all of the AHA-owned public housing properties (including family and elderly communities) are managed by professional property management companies (PMCOs). These companies are responsible for the day-to-day management functions including rent collections, property maintenance, property planning and maintenance, resident services, site security, performance reporting, and capital improvements at the properties. AHA's Real Estate Management group articulates AHA's goals and objectives to the PMCOs and monitors their progress in achieving those objectives. The decentralization of the management of AHA-owned properties since 1996 has enabled AHA to make significant progress toward achieving AHA goals and objectives for each property including achieving the MTW Benchmarks. The management companies are able to apply market discipline and expertise and manage the properties more strategically and efficiently. The AHA-owned high-rise and family communities are collectively referred to as AHA's Affordable Communities.

One of AHA's priorities during FY 2008 will be relocating families from 12 of its remaining, obsolete public housing communities including two senior high-rises and 10 family communities. Combined, these communities house more than 5,500 families that AHA will be relocating to better communities and better neighborhoods over the next three years. After the families have been relocated, AHA will demolish existing structures and conduct competitive procurement processes to engage private sector development partners in the redevelopment or other repositioning of these properties. Any sale proceeds will be used to further AHA's mission. During relocation and for approximately two years thereafter, AHA will support the relocated families with human development and support services provided by professional firms. AHA calls this the Quality of Life Initiative (QLI).

Excluding the QLI communities, AHA will continue to own, operate, and sustain 11 high-rise communities and two family

[1] Also includes six units that comprise the John Hope Model Building, a six-unit building that was part of the former John Hope Homes Community which has since been revitalized.

communities in its public housing portfolio. AHA will strategically invest its capital resources in the 11 remaining high-rise communities ensuring a return on investment over the next ten years. Given that these properties are also obsolete and not market competitive for housing seniors and disabled persons, AHA will continue to explore ways over the next ten years to better position these communities to their highest and best use. For the remaining two family communities, AHA is exploring the implementation of a “fixed” rent initiative and will continue to work with the PMCOs to operate these properties in a way that provides a wonderful quality of life, while continuing to achieve AHA’s MTW Agreement benchmarks for rent collection levels, occupancy rates, emergency and routine work orders, and inspections. **Appendix C** of this FY 2008 Implementation Plan provides more detail on AHA’s goals in reaching these benchmarks during FY 2008.

## HOUSING CHOICE ADMINISTRATION

AHA's Housing Choice Administration business line is responsible for managing the Housing Choice voucher and relocation programs. AHA's Housing Choice voucher program provides income eligible families with the opportunity to make an informed choice as to where they wish to live. AHA's Relocation Program provides services and assistance to residents that are relocated from AHA's Affordable Communities due to revitalization or Qualify of Life Initiatives.

As of June 30, 2006, the Housing Choice program is responsible for the administration of 10,603 vouchers and 2,779 of those vouchers are used by families who have exercised the portability option and moved outside of AHA's jurisdiction. The administrative responsibilities include the day-to-day operations of tenant-based vouchers, project-based vouchers, and special program vouchers including Homeownership, Mainstream (for persons with disabilities), Relocation, and Opt-Out vouchers. Operational activities include qualifying applicants, issuing and tracking lease up and utilization of vouchers, marketing and landlord outreach, determination of rent, inspection compliance, processing of annual recertification, managing the waiting list, and enforcement of AHA CATALYST work requirements and voucher regulatory compliance.

**Strategic Direction.** AHA's Moving to Work Agreement is the foundation for all of AHA's voucher reform initiatives. AHA's Moving to Work Agreement positions AHA for active participation in the private market gaining buy-in for the maximum leverage of federal dollars and securing sustainability of the Housing Choice program. Toward enhancing the Housing Choice voucher program, MTW provides AHA with an opportunity to (1) eliminate administrative burdens and operational costs associated with duplicative processes; (2) better manage subsidy and rent levels so that local markets are not skewed; and (3) improve the receptivity of the Housing Choice program in the local community.

AHA has and will continue to use its MTW flexibility to re-engineer the Housing Choice program. AHA wants to ensure that the Housing Choice program is managed more effectively to achieve greater efficiency, effectiveness, and sustainability from the perspective of all involved parties, clients, landlords and other residents of the City of Atlanta. AHA has taken a new look at a number regulatory restraints that have historically shaped the Housing Choice program including:

- AHA's Moving to Work Agreement allows AHA to align fair market rents with City of Atlanta sub-markets so that the market rents for a particular neighborhood are not skewed by subsidy paid by AHA in that neighborhood. The realignment of the rents will allow AHA to better manage its subsidy allocation so that AHA can provide more housing opportunities in low poverty and less impacted areas.
- AHA has created a higher inspection standard to improve the quality of the product that is subsidized by AHA and to provide better housing opportunities for AHA's families.

- AHA's requirement that all participants enroll in and complete the Good Neighbor Program.[2] The Good Neighbor Program helps prepare Housing Choice participants for better integration and receptivity in Atlanta neighborhoods.

AHA's Housing Choice voucher program provides housing choices to income eligible households in the private rental market. AHA believes that with the appropriate redesign, the Housing Choice program can help AHA fulfill its mission of providing affordable housing while remaining an asset to the larger community.

[2] The Good Neighbor Program is a training series that prepares AHA-assisted families to transition successfully from environments of concentrated poverty into healthy mixed-income communities.

## REAL ESTATE DEVELOPMENT & ACQUISITIONS

The Real Estate Development & Acquisitions (REDA) business line is responsible for (a) facilitating the repositioning of AHA's distressed public housing communities to mixed use, mixed-income communities in partnership with professional private development companies; (b) facilitating, from the public sector side, the management of the HUD grants and contract administration responsibilities, (c) on behalf of AHA, managing the interface with HUD, the City of Atlanta, and related agencies, Fulton County, the State of Georgia, the Atlanta Public Schools (APS) and other public and quasi-public bodies; and (d) interfacing with AHA's private sector development partners to facilitate the pre-development and development activities so that the goals and objectives of the Revitalization Plans and shared vision for the revitalized communities are achieved. REDA is also responsible for implementing strategies that increase the supply of quality affordable housing for low-income working families, seniors, and disabled persons including mixed-income housing and supportive housing.

**Strategic Direction.** In partnership with excellent private sector developers, AHA is employing a variety of strategies to increase the supply of quality mixed-income housing opportunities for low-income families and quality supportive housing for seniors and disabled persons. These strategies include but are not limited to:

- The implementation of revitalization projects utilizing and leveraging HOPE VI and other HUD development grants
- Single-family home development
- Investing MTW Block Grant Funds and/or Section 8 project-based vouchers in residential properties owned by private entities in order to facilitate the creation of mixed-income communities promoting and supporting the development and rehabilitation of housing units that are affordable to low-income families
- Acquiring properties for rehabilitation or development
- Acquiring land for future development

Over the past five years, Atlanta has been experiencing one of highest levels of real estate development. AHA's MTW Agreement provides the agency with the flexibility to be creative and nimble in this active real estate market environment in terms of leveraging its assets toward creating better housing opportunities and better outcomes for low-income families. AHA strongly believes that a two-prong approach of investment flexibility and project-based strategizing leads to more efficiency, better outcomes for families, and enhanced operational and economical viability and sustainability of the agency. AHA is able to garner the long-term financial partnership of private investors; thereby, increasing its competitive edge within the private market ensuring the provision of affordable housing opportunities to low- and very-low income citizens.

AHA has learned that revitalization initiatives must be holistic and focused on community building. Quality housing is obviously important, but good schools and wholesome recreation are keys to strong neighborhoods. As AHA works with its private developers to build new housing, the agency will also continue to engage APS, the Metropolitan YMCA and other service providers to ensure that revitalized neighborhoods will be served by high-performing schools and family-oriented recreation. AHA and Atlanta Public Schools (APS) engaged in a joint strategic planning process during FY 2006 particularly focused on coordinating APS' school reform initiatives with AHA's community revitalization initiatives. AHA believes that high-performing schools are key to the success of mixed-income communities particularly in attracting market rate families. AHA also believes that "Education is the great equalizer" in advancing low income families toward economic self-sufficiency and off of subsidy assistance.

## ASSET MANAGEMENT

AHA's strategic direction is to become an excellent Asset Management organization that acts responsibly with respect to its various financial and real estate resources. Similar to a large equity corporation that must consider the value of its assets, weigh the risks, formulate investment strategies related to its holdings and portfolio, develop and nurture business and community relationships, and provide excellent service to its customers, so too must AHA do the same as it realizes and seeks to sustain its corporate vision of Healthy Mixed-Income Communities. Asset Management is an overarching organizational endeavor that involves cross-departmental coordination and cooperation in order to achieve excellent results.

AHA's approach during FY 2008 will be to consolidate a number of functions related to its real estate-owned, financial investments, lines of credit, construction servicing and loan servicing protocols, legal and oversight processes, and strategic relationships through the ongoing development and implementation of a comprehensive organizational structure that supports the Asset Management priority initiative.

Asset Management involves the management and coordination of cross-department functions and processes that support and drive AHA's repositioning, revitalization and investment strategies. To achieve results in these areas AHA is designing and implementing tactical administrative processes and automated data management systems that capture multifunctional and interrelated activities to ensure that the ongoing implementation of AHA's Asset Management priority initiative is seamless throughout the organization. As an AHA-wide priority, Asset Management will involve the entire organization by identifying the needs and services of each department and the due diligence and support that each department must provide in achieving AHA's Asset Management goals, whether internal or external to the organization.

AHA will continue to develop and evolve those systems, processes, and human resources that are needed to create a successful Asset Management organization.

The Asset Management business line also includes the Office of Policy and Research; the Asset Management and Account Services Group; and the Management and Occupancy Compliance Department. The Asset Management business line is responsible for the strategic oversight and financial management of AHA's assets, real estate investments, and various internal business line and external business relationships on an organizational basis. This business line is also responsible for program evaluation, compliance monitoring activities, and fee-based contract administration business activities. Other activities include policy development and advisement; program evaluation in coordination with local universities, and the MTW Benchmarking Study.

**Strategic Direction.** For over ten years, AHA has been transforming the agency from a public sector/government public housing model to a private sector real estate business model. As a result, AHA has become a diversified real estate company, with a public mission and purpose to serve low-income citizens of Atlanta. The MTW Agreement has allowed AHA to become a more effective and efficient business enterprise. In addition, the MTW Agreement has allowed AHA to further enhance its relationship with its private developers by passing along the MTW relief that AHA has under its MTW Agreement. The MTW Agreement has also allowed AHA to implement strategies necessary to sustain its investments in the Mixed-Income Communities. The realization of the Asset Management priority initiative will be the successful culmination of those efforts.

# AHA Leadership

Strategic management and decision-making guiding the development and implementation of the Business Plan are the responsibilities of AHA's executive management team, which is led by the President and Chief Executive Officer, Renée Lewis Glover. In 2000, Ms. Glover was appointed by the United States Congress to the highly acclaimed Millennial Housing Commission, a group charged with making long-term national policy recommendations to Congress regarding how best to provide, preserve, finance and manage affordable housing. Ms. Glover was named Public Official of the Year in the 2002 *Governing* Magazine. In early 2003, a collaboration among the Center for American Women and Politics, the Ford Foundation, and the Council for Excellence in Government recognized Ms. Glover as one of the top ten American women in government. She also served on the National Advisory Council of Fannie Mae.

Including Ms. Glover, AHA's executive management team consists of six senior executives, six vice presidents and two private sector program managers who are responsible for guiding the day-to-day implementation of the Business Plan. These professionals and their roles and experiences are outlined on the following pages.

## Senior Executives:

**Nick Farsi, Chief Administrative Officer (Strategy, Technology & Operations)**

*"I believe that the health and safety of a community is the basic necessity and foundation for human dignity and hope for the future. Through CATALYST, we will implement a number of enhanced business processes and technological solutions enabling AHA in creating healthy mixed-income communities."*

*Nick Farsi* is a senior executive with over 20 years of diversified experience in Retail, Telecomm, E-Commerce, Real Estate and Web Hosting. As Chief Administrative Officer for AHA, Mr. Farsi is leading business plan initiatives that create strategy that drives the agency's operations and transforms how AHA does business in the 21st century.

**Joy Fitzgerald, Chief Operating Officer (Real Estate Development & Acquisitions)**

*"Our agenda is aggressive in terms of repositioning the distressed public housing communities remaining in the AHA inventory. It is aggressive and urgent because of the prolonged effects of concentrated poverty and isolation on families and communities. Through CATALYST, we are making a positive impact today."*

*Joy Fitzgerald* has more than 25 years of experience in affordable housing and mixed-income revitalization, having served for ten years as the Executive Director of the Houston Housing Authority and most recently for four years as the Director of Affordable Housing for the Georgia Housing Finance Agency. In her AHA capacity, Ms. Fitzgerald provides leadership to AHA's repositioning strategy and oversees the strategic planning and implementation for all AHA redevelopment and acquisition projects.

**Gloria Green, General Counsel & Chief Legal Officer (Legal & Nonprofit Affairs)**

*"As a native of Atlanta, I have a personal commitment to the work that we are doing at AHA. I do not have to look at the before pictures; I have a vivid memory of the before communities. The work that we are doing is extremely important to the citizens of Atlanta, particularly for the children and young people. If you consider for a moment the untapped human potential of our families, you will see what a difference CATALYST will make."*

*Gloria J. Green's* legal career includes serving as an Attorney with the Securities and Exchange Commission in the Office of General Counsel, Washington, D.C. and in the Division of Enforcement, Atlanta Regional Office, and Vice President, Deputy General Counsel and Director of Legal Services for the Federal Home Loan Bank of Atlanta where she directed the day-to-day activities of the Legal Department. Ms. Green is a graduate of Duke University in Durham, N.C. and holds a Juris Doctorate degree from Georgetown University Law Center, in Washington, DC. As an integral member of AHA's senior management team, Ms. Green manages the Legal and Nonprofit Affairs department which provides legal services to support the implementation of the agency's CATALYST Plan.

**Steve Nolan, CPA, Chief Financial Officer (Finance)**

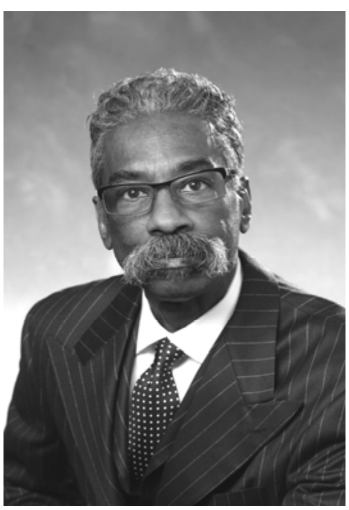
*"Families are the building blocks of society. At AHA, we help create healthy communities for families to live, work, and ultimately flourish."*

*Steve Nolan's* 15 years of accounting and auditing experience in the HUD regulated environment has provided him with expertise in the fields of nonprofit organizations, single audits of government financial assistance programs, and HUD and real estate accounting. He also is a Certified Public Account (CPA) and has experience in analyzing and developing systems of internal control, evaluating accounting systems, and developing and implementing accounting procedures for large and small housing authorities. Under CATALYST, Mr. Nolan provides leadership to financial reforms to make AHA a more economically viable agency.

**E. Mike Proctor, Ph.D., Chief Policy Officer (Office of Policy & Research)**

*"The regulatory relief afforded any agency under Moving to Work is only as useful as the agency is willing and daring enough to make it. AHA has embraced Moving to Work as a component of its innovative business plan, one that can succeed in a regulatory environment, as opposed to a government program that must function within the scope of bureaucratic principles. It is this approach that has enabled AHA to enhance its leadership in affordable housing and, in doing so, meet its public purpose through the creation of excellent quality communities."*

*E. Mike Proctor* provides leadership to CATALYST in the areas of policy, asset management, research and evaluation, and new business opportunities. Dr. Proctor has over 30 years experience in housing programs, housing finance, and community development and revitalization. He received his doctorate with a specialty in public policy and administration from Georgia State University. As a Fannie Mae Foundation Fellow he focused on affordable housing issues at Harvard's Joint Center for Housing Studies. Dr. Proctor is also a graduate of the Harvard Senior Executives in State and Local Government Program at the John F. Kennedy School of Government.

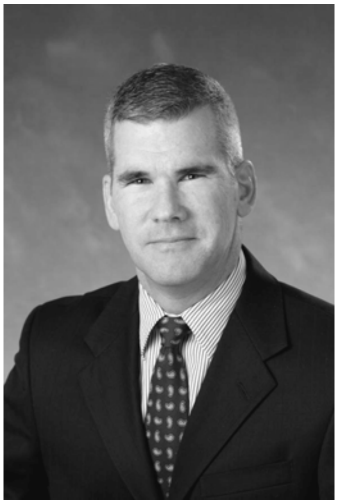


**Barney Simms, Chief External Affairs Officer (Community, Governmental & External Affairs)**

*"The human potential has unlimited possibilities for growth, development, and realization! It is my belief that through CATALYST, our clients now have enhanced opportunities to discover their unique potentials and easier connections to human service organizations, educational institutions, job training programs, and employment. CATALYST has proven to be a roadmap in the transformation of lives; proving that ordinary people can do the EXTRA ordinary."*

*Barney Simms* is a renaissance leader well known for connecting to the hearts and spirits of people challenged by at-risk circumstances and situations. His brand of strategic leadership coupled with his compassion for people, changes their lives and unleashes their human spirit. With more than 20 years of experience as a college administrator and advocate for senior and children issues, Mr. Simms provides leadership in implementing strategies that successfully transition families toward economic independence and off of subsidy assistance.

## Vice Presidents:



**Kevin Anderson, Vice President and Deputy General Counsel (Legal & Nonprofit Affairs)**

*"AHA is taking full advantage of the current financial flexibility and regulatory relief available pursuant to its Moving To Work Agreement with HUD. AHA will undoubtedly convince HUD and Congress that there are substantial alternative solutions to the issues created by long-standing poverty in the United States. AHA's practices will prove to be the affordable housing model for use by other large housing authorities around the country."*

*Kevin Anderson* has 19 years of experience in the areas of contracting, regulated procurement, dispute resolution, business litigation, and real estate matters. He has substantial experience drafting and negotiating complex contracts and business policies and procedures that mitigate risk and allow for meeting and exceeding corporate objectives. Mr. Anderson leads reviews of third party agreements, business plans and initiatives that drive agency operations to ensure they are in compliance with applicable legal frameworks and are in the best interest of AHA.

**Reneé Bentley, CFE, Vice President (Strategy & Planning)**

*"Through CATALYST, AHA has changed the paradigm on how affordable housing is provided to low-income families in the City of Atlanta. The new mixed-income approach has proven to be a tremendously better strategy than concentrating families in poverty. It keeps families in the mainstream and in better living environments where they can thrive, and the quality of the communities is better."*

*Reneé Bentley* has over 20 years of executive management experience in strategic planning, program development, and professional fundraising. Ms. Bentley is a Certified Fundraising Executive (CFE) and holds a B.S. Degree in Biology from Mercer University. Under her leadership, AHA has secured four HOPE VI grants totaling $110 million advancing the revitalization of its distressed public housing communities. Ms. Bentley is leading the development, implementation and performance monitoring of AHA's Business Plan.

**Gary W. Coates, MPA, CFE, Vice President, Asset Management Operations and Account Services Group**

*"The successful implementation of Atlanta Housing Authority's business plan, CATALYST, is an opportunity to provide leadership and direction as we continue to reposition the organization as a leader in the asset management arena."*

*Gary Coates* provides leadership in the areas of asset management systems and relationship management. Gary has over 30 years of diversified experience in retail, manufacturing, government, nonprofit, real estate,, and small business. Gary has previously served as the Chief Operating Officer at Save the Children Foundation's Atlanta regional office. He is a Certified Fraud Examiner (CFE) and has a Masters of Public Administration degree from Tampa College.

**Bruce D. Collins, Vice President (Contracts & Procurement)**

*"The AHA business plan called CATALYST has transformed the landscape of the City of Atlanta with new healthy, amenity rich, mixed-income communities. Equally as important CATALYST has assisted in transforming the lives of AHA clients by rebuilding self worth, healthy outlooks and hope filled futures based upon cooperative partnerships, personal responsibility and the activation of unlimited human potential and faith. The opportunity to assist in the implementation of CATALYST is the embodiment of public service and the substance of things hoped for and evidence of things unseen."*

*Bruce D. Collins* is a senior executive with over 21 years of strategic sourcing, supplier diversity, acquisition/relocation and environmental planning experience in the both the public and private sectors. As the senior purchasing and socioeconomic official for AHA, Mr. Collins supports the implementation of CATALYST through procuring experienced contractors, at the best value, in an open, fair, competitive and respectful process.

**Carolyn McCrorey, Vice President (Human Resources)**

*"CATALYST is the vehicle that drives change and improvement in the lives of the families we serve. Through our employees, we facilitate teamwork, collaboration and partnerships as we continuously challenge ourselves into action to achieve AHA's goals."*

*Carolyn L. McCrorey* is a senior executive with over 20 years experience in human resources, organizational development and executive leadership. Her career includes serving as both Senior Director and Vice President of Human Resources in corporate, regional and field operation environments. In her capacity, Ms. McCrorey provides leadership to all AHA employees and ensures value-added and innovative Human Resources initiatives are aligned with the Agency's vision and mission to drive optimal performance.

**Michael Simmons, CPA, Vice President (Finance)**

*"AHA is in the seventh year of its MTW Agreement and has had a positive impact on the City of Atlanta. Many residents whose futures were once bleak and were written off by society are now flourishing in healthier living conditions. AHA is reversing the cycle of poverty that has lasted for generations and has created a brighter future and lasting legacy."*

*Mike Simmons* is a senior financial executive with over 20 years experience in finance and operations. His career includes serving as Controller, Senior Director of Finance, Vice President of Credit, and Auditor at various companies. He has served on the boards of several non-profit organizations including the YMCA. Mr. Simmons has an MBA in accounting and is a CPA. As Vice President of Finance, Mr. Simmons leads the financial planning and analysis and accounting processes of AHA.

## Program Managers:

AHA has strategically outsourced the operational program management and oversight of its conventional real estate portfolio (Affordable Communities) and Housing Choice program administration to two private sector industry leaders. As an integral part of AHA's organizational management structure, Pat Jones and Cindi Herrera are leading reforms and enhancements of program delivery systems that are aligned with "best practices" in the private sector. Their backgrounds and AHA leadership roles are described in more detail below:

**Pat Jones, Program Manager (Real Estate Management)**

*"CATALYST allows AHA the flexibility to utilize the best practices of vendor partners to provide the tools and resources to improve our communities and to connect residents to opportunities to improve their self-sufficiency."*

*Pat Jones* is a Senior Vice President & Managing Principal for Draper & Associates, an Atlanta-based firm that specializes in formulating and implementing solutions to business challenges with corporate clients. Ms. Jones has 29 years of project and program management and is currently on assignment to AHA as Program Manager for Comprehensive Technical Program Management Services. She has a proven track record in managing public-private relationships. Her experience in construction and contract management enable her to maximize efficiency and quality through the use of strategic partnerships. Her project based approach to improving real estate operations is evident in the AHA's Real Estate Management division that is responsible for the agency's relationship with its private sector partners who operate AHA's Affordable Properties.

**Cindi Herrera, Program Manager (Housing Choice Voucher Reform)**

"*CATALYST is critical in the delivery of affordable housing in the City of Atlanta because it provides the encouragement and support for families in the Housing Choice Program to obtain higher quality housing in economically diverse neighborhoods with better schools and improved employment opportunities. My personal commitment to the success of CATALYST is to ensure that the families we serve in the Housing Choice Program experience positive change. As we re-engineer the Housing Choice Program, we will streamline and simplify the process through which families receive housing assistance; implement higher inspection standards; and, guide families in the selection of a quality living environment."*

*Cindi Herrera* has over 30 years of affordable housing experience in both the public and private sectors. Ms. Herrera has served as a national trainer for the Section 8 Program and has provided technical assistance to operationally troubled Public Housing Authorities around the country. She has served as Executive Director of two Public Housing Authorities. In a consultant capacity, Ms. Herrera is leading the reform of AHA's Housing Choice Voucher Program.

To further its vision, AHA executed its Moving to Work (MTW) Demonstration Agreement (MTW Agreement) with the U.S. Department of Housing and Urban Development (HUD) on September 25, 2003. As a participant in the MTW Demonstration Program, AHA has the financial, legal, and regulatory flexibility to implement local solutions to address local challenges in providing affordable housing. AHA's MTW demonstration period began on July 1, 2003, and will last seven years through June 30, 2010, unless otherwise extended.

The MTW Demonstration Program provides AHA with the opportunity to fulfill its vision and to use AHA's low income operating and capital funds, housing choice subsidies and resources to facilitate better housing opportunities and better outcomes for AHA's families. AHA accomplishes its vision through partnerships with private sector developers, using private sector models and market principles. With its MTW Agreement flexibility, AHA has the ability to address local issues with local solutions. AHA, in consultation with residents, resident advisory boards, local public officials, investors, private developers, foundations, service providers and other stakeholders prepared the Business Plan to be implemented during the seven year period of the MTW Agreement. The Business Plan incorporates the Lessons Learned and the Best Practices during the period from September 1994 until now. The Business Plan, as amended from time to time, is referred to herein as the "Business Plan" or "CATALYST." The Business Plan outlines the major activities that AHA is undertaking using its MTW flexibility to transform the manner of providing the affordable housing resource in the City of Atlanta. Under the Business Plan, AHA is: (1) continuing to transform distressed public housing communities into healthy mixed-income communities, (2) facilitating opportunities for low-income families to live in healthy mixed-income communities, (3) reforming and re-engineering the Housing Choice program, (4) improving the quality of housing for seniors and persons with disabilities, and (5) maximizing its financial resources.

AHA prepared and submitted to HUD its first MTW Plan in June 2004. This comprehensive plan constituted AHA's base plan setting forth the goals and objectives to be accomplished during the MTW seven-year period, utilizing the regulatory relief provided to AHA under its MTW Agreement, as the same may be amended annually and from time to time ("Business Plan"). During the fiscal year ended June 30, 2004 and each fiscal year thereafter as part of the annual MTW Implementation Plan review process, AHA and HUD have negotiated a number of protocols based on the goals, objectives projects, and activities set forth in AHA's Business Plan. AHA and HUD agreed that in order to facilitate innovation, such protocols are needed and as they are established, such protocols would become part of the operating procedures upon which AHA and HUD would rely during the MTW period, as such period may be extended. Each fiscal year, as a result of a comprehensive planning process, AHA determines which of the activities under its Business Plan or what new activities would be undertaken during the fiscal year given the affordable housing needs of its local jurisdiction; policies of AHA's Board of Commissioners; AHA's resources (financial and other); ongoing plans and priorities. Each such fiscal year's activities are set forth in AHA's annual MTW Implementation Plan which is submitted to HUD for review for consistency with

AHA's MTW Agreement. As part of that review process, AHA and HUD determine if additional protocols are needed. For purposes of AHA's Business Plan, as amended by the Annual Implementation Plans, such protocols and Implementation Plan reviews and approvals are cumulative and remain in effect during the MTW Agreement period, as such period may be extended.

# EXECUTIVE SUMMARY:
# OVERVIEW OF FY 2008 IMPLEMENTATION PLAN

AHA's FY 2008 MTW Implementation Plan (the "FY 2008 Implementation Plan") establishes AHA's priorities and activities under the Business Plan for FY 2008, which is the fifth year of AHA's seven-year Moving to Work (MTW) Agreement. The FY 2008 Implementation Plan identifies activities that AHA will undertake during FY 2008.

Since adopting its Business Plan, AHA formalized its strategic planning process in the fall of FY 2005 by establishing the Department of Strategy and Planning. As a result, AHA's senior management team established a "Corporate Roadmap" to guide AHA work toward achieving its vision of creating *Healthy Mixed-Income Communities*. The Corporate Roadmap is an executive dashboard that displays at a glance AHA's long-term goals, corporate objectives, major priorities, and activities that AHA will implement under MTW and beyond. (See **Appendix E** for a copy of AHA's FY 2008 Corporate Roadmap.)

The Corporate Roadmap summarizes AHA's Business Plan into three corporate goals: 1) Quality Living Environments, 2) Economic Viability, and 3) Self-Sufficiency, described earlier. AHA has established four business lines that are the agency's core competencies for implementing its business plan activities and achieving its corporate objectives. These business lines include: Real Estate Management, Housing Choice Administration, Real Estate Development & Acquisitions, and Asset Management. AHA is continuing to re-align and strengthen its corporate infrastructure, financial and reporting systems, information technology environment, and human resources. These activities are described under Corporate Support. In its FY 2008 Implementation Plan, AHA's Business Plan projects and activities are re-aligned around these three goals and six major priorities for implementation across fiscal years. The six major priorities include (1) Revitalization Program, (2) Quality of Life Initiative, (3) Project Based Rental Assistance as a Development Tool, (4) Re-engineering the Housing Choice Voucher Program, (4) Asset Management, and (5) Human Development. These priorities are described in more detail in Parts I – VI of this plan. **Appendix F** includes a graphic that depicts the implementation of AHA's Business Plan over the past four fiscal years, and a directory of major priorities and activities that will be implemented during FY 2008.

The success of the Agency's MTW demonstration program relies heavily on its ability to expedite quickly the implementation of MTW projects and activities using the full flexibility that AHA is granted under its MTW Agreement, particularly the authorizations set forth in the Statement of Authorizations. AHA's leadership, including in-house legal counsel, thoughtfully ensures that its projects and activities are in compliance with the flexibility and authority provided in its MTW Agreement. AHA is submitting its FY 2008 CATALYST Implementation Plan to HUD, together with a board resolution approving the plan and certifying that a public hearing has been held regarding the plan, no later than 60 days prior to the beginning of the FY 2008 fiscal year so that HUD may review the plan for consistency with AHA's MTW Agreement. Beginning July 1, 2007, the first day of fiscal year 2008, AHA will proceed with implementation of priorities, activities, and implementation protocols[3] as

[3] AHA and HUD have developed and negotiated a number of operating procedures in order facilitate innovation.

outlined in its Plan absent prior notice that particular activities and initiatives are in direct violation of specific provisions of the MTW Agreement including the Statement of Authorizations. (Note: For purposes of AHA's Business Plan, as amended by the Annual Implementation Plans, adopted protocols and Implementation Plan reviews and approvals are cumulative and remain in effect during the MTW Agreement period, as such period may be extended.)

AHA developed its FY 2008 Implementation Plan using an inclusive and comprehensive annual planning process soliciting and considering comments and input from its Board of Commissioners, senior management team, private sector development partners, professional management companies, Resident Association presidents, Advisory Board groups, residents of its affordable housing communities, Housing Choice participants, the Georgia Law Center for the Homeless, Atlanta Legal Aid Society, and other stakeholders. A description of AHA's public review and plan changes process is included in **Appendix G.**

During FY 2008, AHA will implement the following six major priorities toward achieving its vision of "Healthy Mixed-Income Communities":

1. **<u>Revitalization Program</u>** – AHA will continue its strategic revitalization program. Currently there are six major revitalization projects underway in various stages of development. AHA and its various private sector development partners are engaged in "community building" projects with the goal of creating healthy and economically sustainable mixed-use, mixed-income communities.

   The two critical components of the revitalization program are the real estate component and the human development component. The goal of the real estate component is to create, in partnership with excellent private sector developers, healthy and economically sustainable mixed-use, mixed-income communities. The goal of the human development component is to facilitate and provide linkages for AHA-assisted families to human development and support services, in partnership with excellent human development firms, social service agencies and educational institutions, to ensure healthy outcomes with the goals of (a) economically independent families, (b) educated children, and (c) self-sufficient elderly and disabled persons.

2. **<u>Quality of Life Initiative</u>** – AHA will relocate families from 12 of its obsolete remaining public housing communities including two senior high-rises and 10 family communities. Combined, these communities house more than 5,500 families that AHA will be relocating to better communities and better neighborhoods over the next three years. After the families have been relocated, AHA will demolish existing structures and conduct competitive procurement processes to engage private sector development partners in the redevelopment or other repositioning of these properties. Any sale proceeds will be used to further AHA's mission.

   AHA understands that relocation causes major changes in a family's life. AHA further understands that the families need support during the transition and adjustment to privately owned housing. In recognition of these realities, AHA will facilitate the provision of coaching and counseling services to each affected family for a 27 month period with goals (a) successful resettlement in privately owned housing; (b) achieving economic independence; and (c) achieving family success. This comprehensive program will be called the Quality of Life Initiative (QLI). A fact sheet describing the QLI including its relocation schedule is located in **Appendix H** of this plan.

3. **Project Based Rental Assistance As A Development Tool** – AHA will continue to utilize Section 8 project based rental assistance as a development tool with the goals of (a) facilitating housing opportunities for families in healthy mixed-income communities; (b) facilitate the development of housing for the elderly, including independent living and assisted living; and (c) facilitate the development of supportive services housing for disabled persons and other transitional housing.

4. **Re-engineering the Housing Choice Voucher Program** – AHA will continue the re-engineering of the Housing Choice Voucher Program including redesigning business systems, establishing a call center to improve customer service, human resources development, and implementing technology solutions to allow self-servicing by participants.

5. **Asset Management** – AHA will continue to develop and evolve the systems, processes and procedures and human resources to create comprehensive and integrated asset management capacity, with an emphasis on technology-oriented solutions.

6. **Human Development** – AHA will continue to facilitate and provide linkages for AHA-assisted families to human services providers to ensure healthy outcomes with the goals of (a) economically independent families; (b) educated children; and (c) self-sufficient elderly and disabled persons.

Specific activities that AHA will implement in support of these six major priorities during FY 2008 are described in more detail in the following sections, Parts I – VI of the FY 2008 Implementation Plan and are further outlined in **Appendix F**. In Appendix F, these activities are categorized into three areas as defined below:

1. ***Priority*** – Major activities that AHA is committed to undertaking during FY 2008.
2. ***Ongoing*** – Routine functions, activities, and/or policies and procedures that AHA is continuing to implement to improve the operational performance and accountability of the agency.
3. ***Postponed*** – Projects identified in AHA's Business Plan where implementation is postponed until FY 2009 or later.

In addition to the six major priorities, the FY 2008 Implementation Plan also includes a description of MTW activities that are being implemented to improve the ongoing operations of the agency. These are described in Part VII of the Plan.

The work outlined in AHA's Business Plan is ambitious. However, AHA's capacity to undertake this work comes from its interdisciplinary orientation and specialized expertise, working across business lines to create a teamwork approach. The interdisciplinary orientation enables decision-making at appropriate levels, creating a comprehensive system of checks and balances. A copy of AHA's corporate organization chart is included in **Appendix I**.

# PART I: REVITALIZATION PROGRAM

AHA will continue its strategic revitalization program. Currently there are six major revitalization projects underway in various stages of development. AHA and its various private sector development partners are engaged in "community building" projects with the goal of creating healthy and economically sustainable mixed-use, mixed-income communities.

The two critical components of the revitalization program are the real estate component and the human development component. The goal of the real estate component is to create, in partnership with excellent private sector developers, healthy and economically sustainable mixed use, mixed-income communities. The goal of the human development component is to facilitate, in partnership with excellent human development firms, social service agencies and educational institutions, healthy economically independent families, healthy educated children, and healthy self-sufficient elderly and disabled persons.

AHA will continue to reposition its conventional public housing assisted properties in partnership with private sector development partners. Repositioning may involve any one or a combination of the following strategies: (1) major revitalization using HUD funds as seed capital and land to attract private sector development interest and private investment; (2) major revitalization using vouchers (obtained from opting-out of the public housing program) and the value of the land as seed capital and equity to attract private investment; (3) sale; (4) land banking; or (5) acquisitions.

As of January 2007, the following revitalization projects are underway or are in predevelopment and will continue during FY 2008:

1. the revitalization of Capitol Homes, including any property acquired for development and any off-site single family homes for sale as part of the revitalization plan.
2. the revitalization of Carver Homes, including any property acquired for development and any off-site single family homes for sale as part of the revitalization plan.
3. the revitalization of Perry Homes, including any property acquired for development and any off-site single family homes for sale as part of the revitalization plan.
4. the revitalization of Grady Homes, including any property acquired for development and any off-site single family homes for sale as part of the revitalization plan; HUD approved an amendment to the HOPE VI Revitalization Plan for Grady Homes to include the revitalization of Antoine Graves and Graves Annex senior high-rises and the revitalization of University Homes as off-site replacement housing.
5. the revitalization of Harris Homes, including any property acquired for development and any off-site single family homes for sale as part of the revitalization plan; HUD approved an amendment to the HOPE VI Revitalization Plan for Harris Homes to include the revitalization of the John O. Chiles senior high-rise including John O. Chiles Annex.

6. the revitalization of McDaniel Glenn including the revitalization of the McDaniel Glenn Annexes and Martin Luther King, Jr. Towers senior high-rise, and including any property acquired for development and any off-site single family homes for sale as part of the revitalization plan.

The associated senior high-rises are in the predevelopment stage. The development partnership for John O. Chiles (main building) received a Low Income Housing Tax Credit allocation in September 2006. The financial closing for the development project is scheduled to occur no later than June 2007.

Recognizing the dynamic Atlanta real estate market, if an attractive opportunity is presented to AHA and that opportunity furthers AHA's strategies, goals and objectives, AHA will move forward with that opportunity. As these opportunities are presented to AHA and the determination is made to pursue these opportunities, AHA will engage in real estate transactions necessary to support the repositioning of AHA's entire portfolio, the development of housing or mixed-use projects and the development of other facilities which are consistent with AHA's real estate strategies and goals. AHA will, as necessary and feasible, and if conditions so warrant, dispose of, demolish or voluntarily convert one or more of the public housing properties in AHA's portfolio. AHA may also demolish or dispose of property for other valid business reasons that are not associated with its repositioning strategies including, but not limited to, the need to address life, safety and health issues of AHA's families. All of AHA's conventional public housing assisted properties are potential candidates for innovative subsidy strategies, rent restructuring or full or partial demolition or disposition in FY 2008. A list of such properties can be found in **Appendix J**. In addition, AHA will, if necessary and feasible, acquire improved or unimproved real estate in its jurisdiction in order to expand AHA's real estate portfolio, provide affordable and/or mixed-income housing opportunities, support local revitalization initiatives and stabilize local neighborhoods. During FY 2006, AHA established an equity investment fund with $12 million from the Housing Choice program to seek opportunities to invest in real estate for future development or sale in order to maximize return on investment.

## Supporting Activities

**A1. Comprehensive Homeownership Program.** During FY 2008, AHA will continue the implementation of homeownership programs that develop affordable homeownership opportunities in healthy, mixed-income communities, and prepare low to moderate income families to become successful homeowners. AHA's homeownership plans for FY 2008 are described in more detail below:

***ROSS Homeownership Program***

To date, AHA has provided homeownership outreach opportunities to approximately 228 participants in its "Keys to Homeownership" Resident Opportunities & Self-Sufficiency ("ROSS") Program. The ROSS program was designed as homeownership outreach to low to moderate income public housing families interested in the home buying process. As part of the outreach, clients are required to actively participate in financial literacy, credit and debt management, and home buyers education classes. During FY 2006, AHA, partnered with HomeFree-USA, a non-profit homeownership counseling agency, as the service provider for ROSS clients. As a result of this successful partnership, 21 participants transitioned from the ROSS program to homeownership. The “Keys to Homeownership” ROSS Grant Program officially ended December 13, 2006. However, AHA will continue to work with these participants during FY 2008 to ensure that at least 10 participants that were not deemed mortgage ready by the ROSS grant ending date, but have completed all required course work, will have the opportunity to continue the home buying process.

***Capitol Homes Revitalization Homeownership Plan – HOPE VI***

The Capitol Homes HOPE VI project is committed to the development of 370 single family for sale units; 141 of the units will be affordable and 229 will be market rate. The development partner, Capitol Gateway, LLC (CG), has partnered with Tyler Place CDC, Historic District Development Corp., Oakland Park, LLC., Auburn Avenue Village, Russell New Urban Development Corp., Reynoldstown Revitalization Corp., Community Redevelopment Loan and Investment Fund, and Lakewood Hills, LLC to provide new construction of the for sale homes. During FY 2008, through a Memorandum of Agreement, these home builders will work with the developer and AHA to ensure Capitol Homes’ HOPE VI homeownership plans are met. Up to $20,000 of HOPE VI funds will be available as down payment assistance subsidy for the 141 affordable for sale units.

***Carver Homes Revitalization Homeownership Plan – HOPE VI***

As part of the Carver Homes HOPE VI revitalization plan, AHA conveyed 22.93 acres to an affiliate of the development partnership for the construction of 202 for sale units. Of the 202 units, 67 will be affordable. The development partner selected a third party home builder to construct these homes. There will be no HUD funds used for homeownership subsidy. For FY 2008, 75 units are projected to be completed, 25 of which will be affordable and 50 will be market.

***Grady Homes Revitalization Homeownership Plan – HOPE VI***

The Grady Homes HOPE VI revitalization plan for off-site for sale single family development includes a partnership among AHA, Grady Redevelopment, LLC (AHA’s development partner), and Atlanta Habitat for Humanity (Habitat) to build 18 newly constructed for sale affordable units. AHA has conveyed 18 lots to Habitat. During FY 2008, Habitat will develop the 18 for sale single family homes, all to be affordable to families at 50% of AMI. Grady Redevelopment, LLC will build three for sale affordable single family homes in the revitalized neighborhood of Grant Park on lots conveyed by AHA. This approach will provide an immediate boost in the revitalization efforts of these neighborhoods and will widen the geographic range of affordable housing.

***Harris Homes Revitalization Homeownership Plan – HOPE VI***

The revitalization plan for the former Harris Homes site is in the predevelopment stage to deliver the first phase of 74 for sale homes committed to in this project. Predevelopment is underway and all due diligence is projected to be completed by the end of May. After the design and financing stage is completed, construction activity is scheduled to begin during the third quarter of 2007, with the first unit delivery or availability the first quarter of 2008. The plan includes 28 affordable units and the use of up to $22,500 of HOPE VI funds available as down payment assistance to qualified buyers.

***McDaniel Glenn Revitalization Homeownership Plan – HOPE VI***

Demolition of the former public housing site is complete. Presently, the homeownership plan for McDaniel Glenn consists of a total of 297 for sale units, of which 67 will be affordable. Eight of the homes will be affordable and 6 of the 11 market rate units have already been completed and sold.

***Perry Homes Revitalization Homeownership Plan – HOPE VI***

The initial phase of this redevelopment project includes 100 on-site, newly constructed for sale single family homes of which 40 will be affordable and 60 will be market rate. AHA is providing down payment assistance for the 40 affordable for sale units in the initial phase of development. Future development phases include an additional 150 on-site for sale single family homes; and approximately 577 off-site for sale single family homes. Twenty percent of these future phases will be targeted as affordable.

# PART II: QUALITY OF LIFE INITIATIVE

The Quality of Life Initiative (QLI) will allow families in AHA's remaining conventional public housing communities the opportunity to relocate from environments of concentrated poverty. This strategy is consistent with AHA's vision of providing eligible families with access to affordable housing while deconcentrating poverty and building healthy communities.

Despite AHA's ongoing revitalization efforts, more than 5,500 families still live in economically and socially detrimental conditions of concentrated poverty. QLI will enable these families to relocate from 12 obsolete public housing projects (two senior high-rises and 10 family communities) to better housing opportunities of their choice. This Initiative will be completed in three phases beginning in 2008 with completion scheduled for 2011.

Phase I of the QLI will be completed in FY 2008 and consists of the relocation of approximately 764 families from the following five properties: Englewood Manor, Jonesboro North, Jonesboro South, Leila Valley, and U-Rescue Villa. A detailed schedule by property is located in **Appendix H** of this plan.

Intensive human development and support services will be provided to support the families both pre- and post-relocation. Human development and support services will continue to be provided for 27 months to each impacted family. Human development activities provided to the families will focus on assuring a successful transition to new communities, increasing economic self-sufficiency, and assisting in the achievement of personal goals.

Georgia State University will assist in providing training under a program (Good Neighbor Program) to prepare families to be successful neighbors. AHA believes that the continuation of Human Services and Support Services will assist with the successful transition of assisted families into their new neighborhoods. AHA's 24-hour customer/community relations hotline (i.e. 1-888-AHA-4YOU) will continue to be available for Atlanta's citizens to contact AHA with compliments and complaints regarding the Housing Choice program. In addition, AHA will implement the following strategies to ensure that the vouchers have a positive impact on neighborhoods: (1) balance portfolio between single-family and professionally managed multifamily properties, (2) raise participant eligibility standards for using vouchers in single family homes, and (3) raise eligibility standards for properties and property owners. More details on these supporting activities are described below.

## Supporting Activities

**A1. Responsible Relocation.** Responsible relocation will ensure choice, support, and successful outcomes for each family. The Relocation Team will provide the families with the tools to make informed choices about the best housing opportunities for their family. Such opportunities include transfers to remaining AHA high-rise communities (for seniors and disabled residents); moving to private rental communities with a limited percent of Section 8 project based rental assistance; and utilization of tenant based vouchers in the location of their choice. AHA will coordinate activities under the QLI with the residents of each impacted community and with community stakeholders including the Atlanta Public Schools. Responsible relocation will ensure choice, support and successful outcomes for each family. The Relocation Team will provide the families with the tools to make informed choices about the best housing opportunities for their family. Such opportunities include transfers to remaining AHA high-rise communities (for seniors and disabled residents); moving to private rental communities with a limited percent of Section 8 project based rental assistance; and utilization of tenant based vouchers in the location of their choice. The Relocation Team will manage the relocation of families with thoughtful consideration of the impact on Atlanta's neighborhoods.

**A2. Good Neighbor Program II.** AHA's Good Neighbor Program (GNP) is designed to coach and prepare AHA-assisted families to live and blend into the communities where they live and help them to understand and value their roles and responsibilities as good neighbors. The training will continue to be provided by Georgia State University during FY 2008. The GNP II expands a number of issue areas discovered during the initial training and places greater emphasis on personal responsibility as well as steps and strategies that promote economic self-sufficiency. This includes, but is not limited to, conflict resolution training, substance abuse and family counseling, and preparing a roadmap for moving off subsidy assistance.

**A3. Human Development and Support Services.** During FY 2008, AHA will expand Human Development and Support Services to provide support to families being relocated as part of the Quality of Life Initiative (QLI). Human Development and Support Services will be provided to affected families for a 27-month period and AHA will solicit additional organizations to provide Human Development and Supportive Services to families.

AHA's philosophy for supporting families through the process of positive transformation is premised on a belief that all members, but especially non-elderly, non-disabled adult members, can and should contribute to the community, and that communities should provide a nurturing environment for such contribution. We believe that in healthy communities there are certain institutions and intangibles that create and sustain the best environment for human development and growth. We recognize that many of AHA's clients may have missed some of these important formative elements and seek to intentionally create such environments within and around the individual.

AHA's human development approach has been developed from numerous lessons learned in similar human and community development situations and believes that it is important to offer support to all members of the family no matter their development phase or demographic grouping. AHA has also learned that the support must be balanced with clear information about individual responsibilities. As a result, the human development process is designed to counsel, coach and educate. Additionally, AHA believes that providing the human development intervention and guidance for the next generation will ensure for them a better chance for individual success and thereby, resulting in successful communities.

This intervention ensures that residents are taught to navigate their way through the mainstream society and identify and develop solutions to their family's problems. Families are connected to key resources which promote growth and development and prepare them to make valuable contributions to their communities both during and after the relocation process. The human development approach to success is developed around four key principles:

1. **Intensive Case Management**

    i. Meet clients where they are to introduce interventions; clients homes, schools and other sites where they operate are the true workplaces of the professional staff

    ii. Consistent and quality communication and contact with clients which takes place as often as necessary

    iii. Identification of barriers to self-sufficiency and other concerns through a thorough human potential assessment process

    iv. Provide assistance and guidance in identifying and developing solutions to immediate and critical issues

2. **Ongoing Life Counseling and Coaching**

    i. Consistent communication which ensures each Family Support Specialist is informed as to the needs, issues, and concerns of each resident

    ii. Coaching through the process of developing life plans and family goals for each household member

    iii. Coaching though the process of problem solving with each family member

    iv. Ongoing monitoring and follow-up with each household member to ensure that the family member remain on track to success

3. **A Connection to Quality Resources**

    i. Seamless referral process with an emphasis on communication, follow-up, and tracking to ensure the following:

        a. Successful enrollment in programs and services

        b. Successful completion of programs and services

        c. Original issues and concerns are addressed

        d. Residents exercise the most appropriate coping skills when problems arise at their employment sites

        e. Ongoing supportive services (transportation, childcare, etc.) are provided that give each client the best chance of being successful

ii. Residents are referred to quality community resources that have a track record of success in addressing the needs and identified barriers to success for low-income individuals and families

**4. The Promotion of Personal Responsibility**

i. Developing an understanding of each family member's role in ensuring family stability

ii. Ensuring there is and understanding of the consequences for non performance

iii. Contributing to their community as appropriate

Emphasis is always placed on providing opportunities that lead to the achievement of social and economic success for the entire family.

**A4. Customer and Community Relations.** As discussed above, AHA's 24-hour customer/community relations hotline (i.e. 1-888-AHA-4YOU) will continue to be available for Atlanta's citizens to contact AHA with compliments and complaints regarding the Housing Choice program.

# PART III: PROJECT BASED RENTAL ASSISTANCE AS A DEVELOPMENT TOOL

AHA will continue to utilize project based Section 8 rental assistance (Project Based Rental Assistance) as a development tool with the goals of (a) facilitating housing opportunities for families in healthy mixed-income communities; (b) facilitating the development of housing for the elderly, including independent living and assisted living; (c) facilitating the development of supportive services housing for disabled persons and other transitional housing; and (d) expanding housing opportunities in areas of low poverty. In order to create great housing opportunities in mixed-income communities for very low income families, AHA will provide Project Based Rental Assistance in support of Low Income Housing Tax Credit (LIHTC) applications under the 2008 Qualified Allocation Plans (QAP) for the State of Georgia. Proposals will also be solicited under the AHA Project Based Rental Assistance Homeless Demonstration Program and the Project Based Rental Assistance Mental Health Demonstration Program, both described in further detail in the following sections. During FY 2008, AHA will be undertaking the following activities as part of the implementation of this major priority.

## Supporting Activities

**A1. Developing Alternative & Supportive Housing Resources.** During FY 2008, AHA will develop and implement three major initiatives toward developing alternative and supportive housing resources for income eligible families. These initiatives include: (1) Project Based Rental Assistance Homeless Demonstration Program; (2) Project Based Rental Assistance Mental Health Demonstration; and (3) Affordable Assisted Living Demonstration Program. Further detail regarding these activities is included below.

In January 2007, AHA's Board of Commissioners authorized AHA to submit to HUD a Designated Housing Plan for the public housing assisted units as part of the Revitalization Plan for the John O. Chiles Main Building and Annex. The revitalization of the John O. Chiles is part of the revitalization of the Harris Homes Community, a wonderfully master planned, mixed-use, mixed-income community. The revitalization plan for the John O. Chiles Main Building is to transfer the land and improvements relating to that building by long-term ground lease to a public/private partnership so that AHA and its private sector development partner can leverage the public housing development funds with private resources so that the Main Building can be comprehensively renovated to become competitive as mixed-income Elderly Housing in today's market place. AHA and its development partner have applied to have the public housing assisted units in the Main Building designated permanently as Elderly Only Housing. The revitalization plan for the John O. Chiles Annex is to transfer the land and improvements relating to the Annex by long-term ground lease to a public/private partnership so that AHA and its private sector development partner can leverage the public housing development funds with private funds so that the Annex can be comprehensively rehabilitated and transformed into supportive housing for persons with mental and developmental disabilities. AHA and its development partner have applied to HUD to have the public housing assisted units at John O. Chiles Annex designated permanently as Disabled Only supportive services housing. Eligible affected residents of the John O. Chiles community will receive priority admission to the housing facilities, provided that they meet the eligibility requirements. AHA has consulted with the resident association at John O. Chiles, the HOPE VI Resident Planning Committee, and community stakeholders with respect to implementing these designations, as required by HUD. During FY 2008, AHA and its private development partner for the revitalization of Harris Homes will continue to work together in the development of these supportive housing resources.

In addition, AHA will continue its work in partnership with foundations and supportive services organizations to identify alternative housing resources and services that will support relocation. During FY 2005, AHA partnered with the Annie Casey Foundation to develop and implement a pilot program called *Responsible Relocation* to identify alternative housing resources for public housing assisted families impacted by the revitalization of McDaniel Glenn who are ineligible for Housing Choice voucher assistance or continued public housing assistance. During FY 2008, AHA will continue to foster similar relationships in support of other Revitalization and Quality of Life initiatives.

**A2. Project Based Rental Assistance Regional Expansion Program.** In AHA's continued effort to increase the quality and choice of the housing stock available to Housing Choice participants, AHA will negotiate Intergovernmental Agreements with various PHAs in the Atlanta metropolitan area subject to the provisions of State law to permit site-based administration of AHA's Project Based Rental Assistance Program in those jurisdictions. AHA will continue this approach with other interested PHAs to continue to expand housing opportunities. Proposals will continue to be solicited for new construction and/or properties placed in service within the past five years. All efforts required to implement this activity will be closely coordinated with the corresponding Public Housing Agency.

**A3. Project Based Rental Assistance Homeless Demonstration Program.** In support of the Mayor's Regional Homeless Commission master plan to eliminate homelessness in the city of Atlanta, AHA has established a Homeless Demonstration Program in collaboration with United Way of Metropolitan Atlanta, Inc. that utilizes Section 8 Project Based Rental Assistance targeted to the chronically homeless population. Under the program, AHA will allocate 100 vouchers annually for each of the next five years towards the implementation of this program. As part of the Regional Homeless Commission's master plan to develop quality Permanent Supportive Housing, the United Way of Metropolitan Atlanta, Inc. has raised $2 million for supportive services as necessary to support the targeted population. During FY 2008, AHA will solicit proposals for project based assistance from housing providers who have partnered with United Way service providers or who will fund the requisite services.

**A4. Project Based Rental Assistance Mental Health Demonstration.** AHA will work with the Georgia Department of Human Resources, Department of Mental Health, and Department of Community Affairs to expand the supportive housing demonstration model to increase housing opportunities for persons with mental health disabilities. Proposals will be solicited from private developers and mental health service providers for existing, rehabilitations, and/or new construction of housing with supportive services for persons with mental health disabilities.

**A5. Project Based Rental Assistance Site Based Administration.** In FY 2007, AHA implemented a site-based administration program for rental properties owned by public/private partnerships sponsored by AHA or other third party owners, for which AHA has provided Project Based Rental Assistance for a percentage of the units utilizing a web-based technology portal for interaction between AHA and the properties. During FY 2008, AHA will develop and implement an enhanced technology solution which will enable such owners to upload directly to the AHA system.

**A6. Affordable Assisted Living Demonstration.** During FY 2008, AHA will continue to explore strategies for developing affordable assisted living opportunities for low-income seniors and for disabled persons. These strategies will include but are not limited to exploring ways to leverage resources with Medicaid Waivers or other service funding through the Georgia Department of Human Resources and Georgia Department of Community Health and exploring ways to use Section 8 project-based rental assistance, Low Income Housing Tax Credits and other financial resources to create affordable assisted living models at AHA-sponsored mixed-income communities**.**

# PART IV: RE-ENGINEERING THE HOUSING CHOICE VOUCHER PROGRAM

During FY 2008, AHA will continue the re-engineering of the Housing Choice Voucher Program. The re-engineering initiative is focused on redesign of systems and business processes utilizing state-of-the-art technology to move closer towards paperless administration of the Housing Choice Program. The re-engineering efforts also include the development and implementation of continuous quality improvement initiatives that will result in improved customer service and operational efficiencies and effectiveness.

## Supporting Activities

**A1. Re-engineering Housing Choice Operations.** During FY 2008, AHA will implement the following supporting activities as part of the re-engineering of the Housing Choice Voucher Program.

**A1a. Annual Re-certification Re-engineering.** AHA will complete the development of the automated re-certification module during FY 2008. Re-certification processes will continue to be streamlined. Households that are exempt from the work/program participation requirement (i.e. Elderly and Disabled) will be re-certified every two years effective July 1, 2007. Households fully compliant with the work/program participation requirement as of their FY 2008 annual re-certifications will also be re-certified every two years upon completion of their FY 2008 re-certifications.

**A1b. Re-engineering Property Owner/Vendor Process.** AHA will re-engineer the process for approval and processing of property owners prior to execution of the Housing Assistance Payment (HAP) contract and eliminate paper checks and mailing of remittance forms to landlords by creating web-based access for each property owner. This project will be merged with the Landlord Certification and Training project into one coordinated effort to improve the quality of property owners participating in the Housing Choice Program. AHA will complete the development of the automated module for screening and approval of property owners and begin implementation during FY 2008. Enhanced owner screening and approval process will include criminal background checks, credit checks and foreclosure history. All current property owners will be required to be certified during FY 2008 and all new property owners will be certified prior to approval of their first Housing Assistance Payment contracts.

**A1c. UHAP Bankcards.** In FY 2008, paper checks for payment of Utility Housing Assistance Payments (UHAP) will be eliminated and bankcards will be issued to eligible program participants. Cards will be loaded monthly with the amount of the UHAP payment and use will be restricted to Atlanta area utility providers only.

**A1d. Automated Outbound Portability Billing.** AHA will work with the Housing Authority of Fulton County (HAFC) in FY 2008 to develop a demonstration to create an automated billing and payment process for all AHA vouchers ported to Fulton County. AHA and HACF will utilize the HUD PIC system to determine the amount of subsidy to be paid. A payment process directly through AHA's ORACLE MIS accounts payable module will be developed and implemented.

**A1e. File Purge and E-copy.** AHA will continue e-copying permanent files on an ongoing basis as a part of its routine operations.

**A1f. Automated Rent Reasonableness System.** AHA will continue to utilize the automated rent reasonableness system established in FY 2007 as part of its routine operations.

**A1g. Program Performance Indicators.** AHA will continue to develop and implement tracking systems for all key Housing Choice program performance indicators. During FY 2008, the automated voucher tracking system will be fully implemented to monitor all vouchers issued by type, average days to lease, voucher success rates for applicants, and program moves. Census tract data for all households will be captured to track impact of deconcentration strategies.

**A1h. Customer Service Call Center.** AHA will enhance the design of the customer service call center to deliver improved customer service and to respond more quickly to customer needs. AHA has institutionalized the call center into its routine operations and will continue to operate the call center during FY 2008 and beyond.

**A1i. Relocation Policies.** During FY 2007, AHA developed corporate policies for discretionary actions under the Uniform Relocation Act (URA) to guide relocation staff in providing relocation assistance and processing relocation claims. AHA will continue the implementation of these policies during FY 2008.

**A1j. Automated Hearing Database.** During FY 2007, AHA developed and implemented an automated system to track proposed terminations, hearing requests, hearing actions, and final disposition of terminations in the voucher program. AHA has incorporated the use of this system in its routine operations and will continue to utilize the system during FY 2008.

**A1k. Develop Re-occupancy Process.** AHA will refine and improve the process for the re-occupancy of newly developed mixed-income communities. Revised procedures for the re-occupancy of the revitalized communities will be completed and included in AHA's Relocation Implementation Procedures Manual during FY 2008. A bi-annual web-based search will be conducted for relocated residents that have moved outside of the AHA-administered programs to secure and maintain the most up-to-date addresses. Research will continue to populate the re-occupancy data in the automated system and reliable data for all AHA relocation activity.

**A1l. Pre-qualification of Units.** This activity is focused on establishing a methodology to pre-qualify available housing units prior to listing on AHA's website. AHA is postponing the development and implementation of this activity until FY 2009.

**A1m. Automated Collections Process.** This activity focuses on the development and implementation of an automated system for fraud recovery and tracking of repayment agreements in the voucher program. AHA is postponing the development and implementation of this activity until FY 2009.

**A2. Housing Choice Voucher Administration Reform.** AHA will implement the following activities to align the Housing Choice Program with its strategic vision.

**A2a. Standards for Residency in Single Family Homes.** AHA will adopt and implement single family home eligibility standards (1-4 units) to assure that families are prepared financially and otherwise to live in single family homes and be successful in neighborhoods. These standards may include, but are not limited to, household compliance with the work/program participation requirement, a demonstrated ability to maintain a single family home, an acceptable participant household history, and a minimum amount of earned income.

**A2b. Homeownership Standards.** AHA will review and refine certain eligibility criteria and standards for using the voucher for homeownership and open the voucher waiting list for families that demonstrate homeownership readiness. AHA will expand the area in which AHA voucher participants may purchase a home. Homeownership standards may include, but are not limited to, successful participant history as occupants of a single family unit, a limit on the percentage of a mortgage that can be paid using voucher subsidy, household compliance with the work/program participation requirement, and minimum household income requirements. In FY 2008, AHA will undertake the development of a Homeownership Self-Sufficiency (HSS) Program.

**A2c. Intake/Waitlist Re-engineering.** AHA will design and implement a new intake process to align with CATALYST eligibility requirements. AHA will procure a third party vendor during FY 2008 to purge the existing Housing Choice waiting list to assure that all applicants are compliant and/or exempt from the work/program participation requirement. Development of the automated waitlist and eligibility module will be completed and fully implemented with all waitlist data transferred from the old database system. Enhanced standards will be developed for inbound portability to enforce all CATALYST policy requirements.

**A2d. Housing Choice Fair Market Rent Standards.** AHA has developed its own Payment Standards based on local market conditions and identified submarkets that exist within the City of Atlanta. Utilizing a third party Real Estate Market Research firm, the submarkets were determined in FY 2007, and in FY 2008 separate payment standard schedules will be implemented for each of the identified submarkets in the City of Atlanta upon establishment of new contracts and at the next recertification for existing contracts.

To implement these and other voucher related activities included in this FY 2008 Implementation Plan and the Business Plan, AHA will continue the modification of certain HUD mandated forms and documents, including but not limited to, the Housing Assistance Payment (HAP) contracts, the Agreement to make Housing Assistance Payments (AHAP), and the Housing Choice Voucher. AHA may also create new documents and forms to substitute for the typical HUD mandated forms used with the Housing Choice program.

**A2e. Program Moves.** During FY 2007, AHA began implementing strategies to reduce the number of moves participants make while in the program. AHA will allow moves only for a limited number of reasons, including, but not limited to, emergencies and foreclosures. During FY 2008, AHA will continue to implement and refine these strategies as part of its routine operations.

**A3. AHA Standards and Incoming/Outbound Ports.** AHA currently requires housing choice voucher holders to be in full compliance with the CATALYST standards, including compliance with its work/program participation requirement, criminal background screening in accordance with AHA's standards, and participation in AHA-approved self-sufficiency programs and the Good Neighbor program prior to approving the family's request to port to another jurisdiction. However, once under contract with a receiving PHA, AHA has no mechanism that allows continued enforcement of these requirements. During FY 2008, AHA will work with the Housing Authority of Fulton County (HAFC) to develop a demonstration to enforce CATALYST and other MTW requirements on all AHA voucher holders ported to Fulton County. AHA will not establish limits on the number of families who can port but will apply Program Move guidelines to participants who desire to port out. In addition, inbound portability will only be accepted if the household is in full compliance with the work/program participation provisions and other CATALYST criteria.

**A4. Housing Choice Fixed Subsidy Initiative.** During FY 2008, AHA will implement changes in recertification requirements for certain households that have an interim income change. All interim reporting will be eliminated and a single annual and/or bi-annual recertification process will be implemented. AHA will conduct a rent impact analysis, obtain necessary Board of Commissioners approval, and submit the information to HUD as required by its MTW Agreement. Fixed deductions will be initiated pursuant to the impact analysis.

**A5. Enhanced Business Systems (Family Obligations Document Enforcement, Enhanced Criminal Screening, and Health and Safety Standards.)** As part of its Housing Choice Reform initiative, AHA will continue to refine the business processes associated with implementing CATALYST policies in the Housing Choice program. Enhanced business systems for implementing CATALYST policies, enhanced criminal screening and health and safety standards are established and will continue to be implemented as a part of Housing Choice routine operations during FY 2008.

**A6. Elderly Income Disregard.** On October 1, 2004, AHA implemented an income disregard for the Public Housing and Housing Choice programs for employment income earned by elderly residents or participants on fixed income. AHA will continue to recognize and implement this income disregard as part of its routine operations during FY 2008.

**A7. $125 Minimum Rent.** Effective October 1, 2004, AHA raised its minimum rent from $25 to $125 under its Public Housing and Housing Choice programs as well. Households on fixed incomes, where all members are either elderly or disabled, are exempt from the minimum rent increase and their total tenant payment continues to be based on 30% of their adjusted gross incomes. Hardship waivers may be granted under certain limited circumstances, on a case-by-case basis, based on criteria established in AHA's Administrative Plan. AHA will keep its minimum rent at this level for FY 2008, and will continue to implement the $125 minimum rent as part of its routine operations during FY 2008.

**A8. Housing Choice Landlord Certification and Training.** AHA is delaying its plans to develop a mandatory Landlord Certification and Training Program to educate landlords on the requirements for placing and maintaining their properties in the Housing Choice Program, until FY 2009. However, landlord briefings are being implemented in March of 2007 and will continue into FY 2008 with the objective of providing an informational approach to AHA landlord expectations and program participation requirements.

**A9. Housing Choice Inspection Fees.** AHA will charge landlords reasonable fees for pre-inspections and subsequent re-inspections following the initial re-inspection to cover the administrative costs associated with these additional inspections. Additionally, participant households may be charged a fee to cover the administrative costs of re-inspections due to certain deficiencies which are the responsibility of the household and remain unaddressed. AHA is delaying the implementation of this project.

**A10. Place-based and People-based Deconcentration Strategy.** AHA will develop and implement a deconcentration strategy with the goal of decreasing the number of Housing Choice assisted families residing in areas of concentrated poverty. Briefing information to voucher holders will be revised in FY 2008 to identify areas of lower concentration of poverty to assist families to make informed choices in selecting residential locations. Marketing will be implemented to increase the number of professionally managed multifamily properties in areas of lower poverty. Statistical reporting will be developed and implemented to support monitoring of voucher movement under this project until FY 2009.

**A11. Enhanced Real Estate Inspection Systems.** During FY 2008, AHA will continue to use its higher inspection standards for all subsidized units and integrate various inspection processes and systems. Distinct standards have been developed for multifamily and single family inspections and a property assessment program has been implemented for multifamily properties. This assessment program looks at all areas within the land footprint of the property as well as the surrounding neighborhood conditions. Single family standards also include inspection of the surrounding neighborhood as well as the specific property under contract. These standards will continue to be enhanced in FY 2008 and the program fully implemented for enforcement pursuant to these standards. More details describing AHA's FY 2008 plan for enhancing its Housing Choice real estate inspection systems are included in **Appendix K**.

**A12. Enhanced Relocation Process and Database Enhancements.** In FY 2008, the Consolidated Relocation Management System (CRMS) will be integrated into the ORACLE E-business suite and simplified to remove duplicate data now existent in the Housing Choice data system. We will continue to refine and develop reports to provide additional support to the QLI, and the Relocation Implementation Plan and Procedures Manual will be completed and used as the guidebook for all relocation staff. AHA will coordinate the relocation of family communities with Atlanta Public Schools and expand the use of strategic partners and stakeholders to assist with relocation in support of revitalization and QLI activities.

# PART V: ASSET MANAGEMENT

AHA will continue to develop and evolve the systems, processes and procedures and human resources to create its comprehensive and integrated asset management capacity, with an emphasis on technology-oriented solutions. During FY 2008, AHA will consolidate a number of functions related to its real estate assets and relationships through the ongoing development of a comprehensive asset management and account services relationship system. Asset management involves the management and coordination of cross-department functions and processes that support and drive AHA's repositioning, revitalization and investment strategies. AHA is designing an automated asset and account management system that captures multifunctional and interrelated activities to ensure that AHA's approach to asset management is seamless throughout the organization. This organizational project will involve all departments based on the needs and services each department is impacted by and/or brings to the project and the due diligence and support each provides in achieving asset management goals, whether internal or external to the organization.

## Supporting Activities

**A1. Private Sector Innovation**. The public/private partnerships formed to own AHA-sponsored mixed-income multifamily rental apartment communities (Owner Entities) will use innovative approaches to achieve goals and objectives at their properties. The Owner Entities will adopt their own occupancy, leasing and rent policies and procedures with respect to their own occupancy, leasing and rent policies and procedures with respect to their communities and the assisted residents or applicants. These policies and procedures would include, but not be limited to, new rent structure (e.g. fixed rents), application and waiting list procedures, eligibility and/or suitability criteria, program/training participation requirements and term limits. During FY 2008, AHA will implement an ongoing planning process with the Owner Entities to identify opportunities for private sector innovation using MTW Agreement flexibility. Also during the 2008 fiscal year, AHA will compile policies associated with Mixed-Income Communities under a separate document to be called Statement of Corporate Policies for Mixed-Finance Communities and Other Investments.

**A2. Sustaining Mixed-Income Investments.** In order to sustain and preserve investments in low income housing at AHA-sponsored Mixed-Finance, Mixed-Income Communities, AHA will submit disposition applications to HUD to dispose of the public housing operating subsidy supporting that specific number of units governed by and funded under an Annual Contributions Contract ("ACC") and its corresponding Mixed-Finance Amendment for each of the respective Mixed-Finance, Mixed-Income Communities. The disposition applications will be submitted to the Special Applications Center pursuant to the Statement of Authorizations under AHA's MTW Agreement. The timing of the submission of any disposition application would be 15 years from the official date the tax credits were placed in service serving as the basis for the beginning of the initial tax credit compliance period for each respective community. This milestone would be established for each community irrespective of when, past or present, the tax credits were placed in service pursuant to the Low Income Housing Tax Credit program or, as the case may be, pursuant to the equity investment requirements from other sources. The rationale for implementing the Section 9 disposition at this point in the remaining economic life of the property would be to raise and invest new capital for needed improvements before the property passes that critical stage in its life cycle when extraordinary costs to make improvements and to service debt would exceed the diminishing level of cash flow from the Section 9 operating subsidy. This would be the most opportune time to ensure the viability, sustainability, and preservation of each mixed-finance, mixed-income investment as each property matures and reaches this 15-year milestone. Those Mixed-Income Communities receiving public housing operating subsidies as listed in **Appendix D** of this plan, and as further updated by this plan, are candidates for disposition under this strategy. (Please refer to **Appendix J** for the list of Mixed-Income Communities). Upon HUD approval of each disposition application, and in agreement and coordination with the owner entity, an appropriately styled declaration of restrictive covenants would be executed and recorded to replace the original declaration of restrictive covenants. The maturity date for the term of the new declaration of restrictive covenants would be the same maturity date as the original declaration. The new declaration would establish that the applicable portions of the property and the improvements would be utilized for low income housing at a rental rate equivalent to the rents payable by Section 9 eligible families based on income. To ensure the long-term affordability of each Mixed-Finance, Mixed-Income Community, AHA would provide Section 8 Project-Based Rental Assistance. During FY 2008, AHA will continue the implementation of Summerdale Commons as its first demonstration of this strategy, which is an initiative that HUD had previously approved in AHA's FY 2006 MTW Annual Plan.

In consideration of the need to position the long-term strategy proposed in the first paragraph to ensure the continued viability of Mixed-Finance, Mixed-Income Investments, AHA would pursue a short-term strategy. When dispositions are not immediately practical or feasible due to the unexpired term of the 15-year tax credit compliance period, AHA would adopt certain features of the HUD loan management branch's servicing and administration of project-based Section 8 HAP Contracts that enhance FHA-insured assets owned and operated by private sector entities. In pursuing a paradigm shift from the traditional public housing operating subsidy regime to one supported by housing assistance payments, AHA would establish, at its discretion, a HUD loan management-style method of budget management and subsidy payments for existing Section 9 ACCs and their corresponding Mixed Finance Amendments until those communities became eligible for disposition upon reaching the 15-year milestone. A rider or ancillary agreement to the existing ACCs and amendments would be the legal and financial arrangement that would establish and implement the housing assistance payments methodology without disposing of the Section 9 ACCs. The proposed rearrangement of the existing Section 9 model would provide an effective means to ensure that as resident incomes increase, and likewise their portion of the rent increases, such increases in resident contributions would not inversely impact the subsidy that would sustain the ongoing viability of the asset. Under this arrangement, in the short-term until full dispositions can be approved, housing assistance payments would be tied to an AHA-approved affordable market-based rent and not to an imputed operating subsidy benchmark. In some cases in order to assure that the rents remain affordable to residents should there be a Section 9 subsidy short-fall, AHA will, at its discretion, enter into separate legal and financial agreements with the owner entity of a Mixed-Finance, Mixed-Income Community to provide housing assistance payments to fill the gap created by a Section 9 subsidy shortfall with AHA's MTW funds. In pursuing this strategy as an initial approach for sustaining Mixed-Finance, Mixed-Income Investments, AHA's MTW regulatory relief authorizes AHA to utilize existing resources to preserve the availability of affordable, low income housing.

**A3. Innovative Subsidy Strategies for AHA's Affordable Communities Providing Housing for Seniors and Residents with Disabilities.** This supporting activity will provide innovative strategies for changing the Section 9 subsidy arrangement at those AHA Affordable Communities that provide housing for seniors and residents with disabilities; resident populations who, at the end of the day, would benefit the most from a change in the subsidy structure. The opportunity for such Affordable Communities to achieve long-term viability can only be realized by either removing (through disposition) or restructuring the Section 9 ACCs governing that group of communities that AHA will retain in its real estate-owned portfolio that provide housing for seniors and residents with disabilities. This supporting activity is unique to AHA because AHA provides housing for a large population of seniors and residents with disabilities. AHA, being extremely sensitive to the needs of the two populations, recognizes that the quality of life in high-rise communities can only be enhanced with a strong and stable source of operating income that will demonstrate the long-term viability and sustainability of those communities that provide housing for its most fragile residents. A service provider network that would serve seniors and residents with disabilities funded from other sources would be an important and huge outcome of this strategy. In addition, AHA would be able to generate the income necessary to reinvest in these communities in order to meet the accessibility needs of these special populations. This supporting activity is an AHA concern, and should be one at the forefront of HUD's agenda when working with agencies such as AHA with a real estate-owned portfolio that is primarily comprised of housing for seniors and residents with disabilities.

AHA will advance innovative subsidy strategies in an intentional and strategic manner within the MTW regulatory relief already granted to AHA. The removal of the public housing operating subsidy from the targeted Affordable Communities will have a positive impact on preserving those communities as affordable, low income housing for seniors and residents with disabilities. Such innovative subsidy strategies would complement and enrich the environments for both resident populations in designated housing communities, when such designations are appropriate in creating the best environments for communal living. Affordability would be assured through Section 8 Project Based Rental Assistance. When a disposition strategy is not practical or feasible, AHA would establish, at its discretion, a HUD loan management-style method of budget management and subsidy payments for existing Section 9 ACCs. An amendment to the existing Section 9 ACCs for the targeted Affordable Housing Communities would then become the vehicle for establishing the legal and financial arrangement that would implement the use of housing assistance payments in those communities without disposing of the Section 9 ACCs. The proposed modification of the existing Section 9 model would provide an effective means to ensure that as resident incomes, increase, and likewise their portion of the rent increases, such increases in resident contributions would not inversely impact the subsidy that would sustain the ongoing viability of those communities for senior and disabled residents. Housing assistance payments would be tied to an AHA-approved affordable market-based rent and not to an imputed operating subsidy benchmark. In some cases when AHA must assure that the rents would remain affordable to senior and disabled residents when there would be Section 9 subsidy short-falls, AHA would, at its discretion, provide housing assistance payments to fill the gap created by any Section 9 subsidy shortfalls by supplementing the Section 9 operating subsidy with AHA MTW funds. Clearly, in either case, the ability and flexibility to use private-section housing industry practices to achieve greater operating efficiencies, unimpeded by restrictive operating subsidy rules and regulations, will provide financial stability and the necessary operating income that can be reinvested in AHA-owned Affordable Communities and, in doing so, improve the lives of seniors and residents with disabilities.

**A4. Streamlining Property-Level Operations**. Formerly referred to as the Tax Credit Compliance Model, the central focus of this initiative is to streamline operating procedures at the property level by examining the various regulatory requirements that are attached to financing and funding development activities and looking for ways to reduce duplication of effort, obsolete systems, and powering up an approach that will allow AHA's business partners to provide data to AHA that can be used in meeting requirements in reporting back to HUD and other funding and equity sources. During FY 2008, AHA will survey various regulatory requirements and develop protocols for streamlining property-level operations and enhancing operating efficiencies.

**A5. Fee-Based Contract Administration.** AHA is a founding member of Georgia HAP Administrators, Inc. (GA HAP), an eleven-agency consortium organized to provide project-based administration services to HUD. AHA earns ongoing administrative and incentive fees as a subcontractor to GA HAP for conducting management and occupancy reviews. AHA is also a traditional contract administrator for eight properties. HUD has announced that traditional contract administration functions carried out by local housing agencies will be transferred to the jurisdictional PBCA, which means that during FY 2008, AHA's traditional contract administration portfolio will be transferred to GA HAP, the jurisdictional PBCA, thereby becoming part of AHA's GA HAP subcontractor portfolio.

**A6. Mark to Market Program.** The Mark to Market program is designed to evaluate the financial condition of privately-owned FHA-insured multifamily assets with expiring Section 8 project-based HAP contracts in order to determine the need, and to what extent, rents and/or debt should be restructured to preserve these affordable housing resources. As a Participating Administrative Entity, AHA conducts multifamily asset restructurings throughout the state of Georgia and, in doing so, assesses the best restructuring strategy for the property to ensure that the asset will remain viable. AHA earns unrestricted fees based on its performance and the level of difficulty of the restructuring. AHA's evaluation includes reviews of market rents, property appraisals, physical condition assessments, operating expenses, reserve for replacements, and management capacity. AHA then prepares a pro forma financial analysis and makes a recommendation to HUD's Office of Affordable Housing Preservation. AHA has been assigned 23 restructurings. Recently, Congress extended the Mark to Market Program through FFY 2010.

**A7. Oversight of Turnkey III Assets.** The HUD-approved close-out plan for the Turnkey III Homebuyers Program will continue into FY 2008. AHA will provide ongoing oversight of the physical and financial assets related to (i) the conveyance of two AHA-owned community centers to the neighborhood homeowners associations; (ii) establishing contingency reserves for each community; and (iii) managing the remaining allocation of Turnkey III debt forgiveness funds that will support MTW, CATALYST, and other housing initiatives benefiting low-income families.

# PART VI: HUMAN DEVELOPMENT

AHA will continue to facilitate and provide linkages for AHA-assisted families to human services providers to ensure healthy outcomes with the goals of (a) economically independent families; (b) educated children; and (c) self-sufficient elderly and disabled persons.

Concentrating families in poverty has resulted in huge social costs to the families and to society. AHA recognizes that changing the housing alone will not address many of the underlying problems faced by the 12,263 residents still residing in its conventional public housing communities as of January 31, 2007. Most of these residents are desperately poor, subsisting on an average annual household income of just over $11,063, well below the national poverty level. Concentrated poverty, furthered by the on-site delivery of social services, has disconnected families from mainstream society. Many families impacted by the long-term affects of concentrated poverty are marginalized as citizens and have been stripped of their dignity and sense of belonging to the larger community.

AHA is committed to ending the warehousing of low income families in concentrated poverty and to creating healthy, market competitive, mixed-use, mixed-income communities where families can thrive. Market competitive, mixed-use, mixed-income communities offer quality housing, schools, employment opportunities, retail, amenities, and a wider range of choices and opportunities. To ensure that families are successful, AHA has adopted three guiding philosophies in delivering services to families impacted by revitalization. First, all families must be served and benefited by Human Development and Support Services Programs, especially during community revitalization. Second, families who have lived in concentrated poverty must have comprehensive, hands-on support to connect them to mainstream society and new opportunities. Third, Human Development and Support Services Programs must be outcome driven with the expectation of success for all families.

AHA has raised its expectations and standards grounded in the belief that all human beings have unlimited potential. AHA believes that repositioning its family communities into mixed-use, mixed-income communities is vital to the long-term success for families and neighborhoods. To augment this repositioning, AHA has implemented important policy changes to inspire and facilitate families to achieve their life goals regardless where they choose to live. The policy changes have two objectives: (a) families must take personal responsibility and accept and fulfill their role in this effort, and (b) 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.

AHA has developed the following supporting activities and policy changes that focus on self-sufficiency by facilitating opportunities for families to build wealth and reduce their dependency on subsidy, ultimately becoming financially independent.

**A1. Work/Program Participation Requirement.** AHA's work/program participation policy requires that (a) at least one non-elderly, non-disabled adult household member maintain continuous full-time employment and (b) all other non-elderly, non-disabled adults maintain work or participation in a combination of school, job training and part-time employment as a condition of the household receiving and maintaining subsidy assistance. AHA will continue to implement its Work/Program Participation Requirement at the Affordable Communities as a part of the PMCOs routine operations. In addition, this policy states that AHA may require residents to attend economic independence or training programs if referred by AHA, its representatives or agents as a condition of receiving and maintaining subsidy. These programs include, but are not limited to, job skill/training programs, assessment services, coaching and counseling services, the Good Neighbor Program and programs offered by the City of Atlanta Workforce Development Agency (AWDA).

**A2. Connections to the Service Provider Network (SPN).** AHA will continue to implement and refine its referral system that connects AHA-assisted families with the services provided through the Service Provider Network (SPN) - a network of established Atlanta-based service providers with demonstrated capacity that serve as a resource for families preparing to participate in the workforce and/or to become part of the mainstream. These processes ensure that families have access to employment, training, and supportive services resources. To link families to the SPN, this referral system uses AHA staff as well as on-site resident services staff at AHA-owned communities, Housing Choice staff, and the providers of Human Services Management described in Part III of this plan. During FY 2008, AHA will continue to explore ways to improve the process of connecting AHA-assisted families to needed services. The agency will particularly develop ways to better connect the "hardest to serve" population who are often plagued with undiagnosed mental illness and illiteracy. AHA also plans to expand its contractual relationship with AWDA to serve as the "Section 3 Clearinghouse" for training and preparing AHA clients and client-owned businesses and matching them with employment and contract opportunities offered by AWDA business partners and AHA contractors.

**A3. Service Provider Network.** AHA will further develop and maintain a network of established Atlanta-based service providers (the Service Provider Network or SPN) as a resource for AHA-assisted families to prepare themselves for participation in the workforce and to become part of the mainstream. During FY 2008, AHA will continue to identify funding to support the work of the SPN and assist member organizations in developing programs and services to meet the ongoing needs of AHA-assisted families. AHA will also identify additional service providers that offer job training/placement services, and mental health and counseling services to meet the needs of those families that are hardest to serve. In addition, AHA will recruit quality service providers from predominant areas where AHA-assisted families reside. AHA will also continue the development of the following partnerships initiated in FY 2007: (1) Georgia Rehabilitation Outreach and Morehouse School of Medicine to provide intensive mental heath services to families; (2) Atlanta Metropolitan College, Georgia State University, and the Atlanta Public School System to provide long-term GED preparation to individuals who require two or more years of educational training; and (3) Manpower Corporation to serve as an employer placing residents/participants in long-term and contract-to-hire job opportunities.

**A4. CATALYST Resource Guide.** AHA will continue to publish and distribute the CATALYST Resource Guide which provides information on organizations which offer educational services, disability services, employment and training, homeownership counseling services, childcare, and senior supportive services. During FY 2008, AHA will develop a metro-wide guide focusing on resources in predominant areas where families reside.

**A5. Housing Choice Family Self-Sufficiency (FSS) Program Re-engineering.** During FY 2008, AHA will close out the former HUD FSS Program and develop a new simplified FSS Program. The new FSS Program will be marketed to tenant-based and project-based voucher participants as well as to AHA public housing assisted tenants at the Affordable Communities and Signature Properties. The newly designed FSS Program will provide a flat escrow available only towards the purchase of a home.

**A6. Human Development & Support Services.** AHA decided several years ago that a critical component to the relocation process was investing in the affected residents during the development period, so that families would have an opportunity to work through any barriers to family or individual success in the newly revitalized community, in their new community with the Housing Choice voucher, or in another public housing assisted community. The Human Development and Support Services delivery strategy was designed by IMS Human Services (now called Integral Youth & Family Project – IYFP) in collaboration with AHA. IYFP piloted this program with the intent and purpose of working with each and every affected resident to provide intensive, ongoing life counseling and coaching, a connection to quality resources, and the promotion of personal responsibility. This program responded directly to the criticism by Senator Barbara Mikulski that the affected residents were not receiving the benefit of supportive services from the HOPE VI grant. AHA and IYFP determined that this was the best way to achieve that vision. The program has been very successful. AHA agreed that such an investment in the residents must and would happen during the development period while the real estate development activities were taking place in parallel.

During FY 2008, existing Human Development and Support Services service providers will continue to provide coaching and counseling and human development services to families affected by the revitalization of the former public housing communities: Capitol Homes, Carver Homes, Grady Homes, Harris Homes, McDaniel Glenn, Perry Homes, University Homes as well as four associated high-rises tied to the revitalization activities: John O. Chiles, M.L. King Towers, Antoine Graves and Graves Annex. In addition, AHA will expand the services to provide support to families being relocated as part of the Quality of Life Initiative (QLI). QLI is AHA’s plan to further deconcentrate poverty by phasing the relocation of families and demolishing 12 outdated, obsolete communities including two senior high-rises and 10 family communities during a three-year period. During FY 2008, human development and support services will be provided to affected families for a 27-

month period and AHA will solicit additional organizations to serve as Human Development and Support Services service providers.

**A7. Atlanta Community Scholars Awards (ACSA).** Launched in 2003, the Atlanta Community Scholars Awards (ACSA) is an Atlanta Housing Authority (AHA) initiative which provides post secondary scholarships to eligible AHA residents to attend the college, university or technical school of their choice. The goal of ACSA is to encourage more youth assisted by AHA to consider and pursue higher education in preparation for the workforce. Encouraging lifelong learning is an integral component of AHA's vision for building healthy-mixed-income communities and encouraging individual self-sufficiency. The United Negro College Fund (UNCF), one of the nation's oldest and most successful education assistance organizations, is committed to increasing opportunities for minority students and has partnered with AHA to provide fiscal oversight for grants and gifts received for ACSA and scholarship disbursements to awardees. Scholarships are awarded without regard to race, religion, gender, national origin or disability status. All candidates must participate in the ACSA scholarship application process and meet established eligibility criteria.

**A8. Customer and Community Relations.** AHA will continue the implementation of its customer and community relations phone line (1-888-AHA-4YOU) to respond effectively to citizen concerns and compliments regarding Housing Choice participants in their neighborhoods.

**A9. Good Neighbor Program II.** AHA's Good Neighbor Program (GNP) is designed to coach and prepare AHA-assisted families to live and blend into the communities where they live and help them to understand and value their roles and responsibilities as good neighbors. The GNP was refined and updated as the Good Neighbor Program II (GNP II). The scope of GNP II training has been expanded to address a number of additional issues based on lessons learned during the first phase of the Program. Georgia State University was selected to implement GNP II. GNP II places greater emphasis on personal responsibility as well as steps and strategies that promote economic self-sufficiency. GNP II also covers, among other things, conflict resolution training, substance abuse and family counseling, and preparing a roadmap for moving off subsidy assistance.

**A10. Individual Development Accounts (IDAs).** In implementing this initiative, AHA plans to eliminate the existing earned income disregard and replace it with Individual Development Accounts (IDA) program for public housing assisted residents who are 18 to 61 years of age and who meet certain requirements. AHA has postponed the development and implementation of this program during FY 2009.

**A11. School Attendance Requirement.** During FY 2006, the Georgia state legislature passed a law that requires minors to be in school in order to receive a work permit. Because of this new law, AHA eliminated its FY 2005 requirement that 16 and 17 year olds work full-time if they are not in school and instead require all minors under 18 years of age to attend school as a condition of the household maintaining or receiving subsidy assistance. Although AHA has postponed the development and implementation of this initiative, the agency will continue to strengthen its partnership with Atlanta Public Schools, and will undertake a more aggressive enforcement of the lease requirement for youth to attend school.

**A12. Placed-Based Supportive Services Strategy Pilot.** During FY 2007, AHA in collaboration with a number of partners continued the implementation of a placed-based pilot referred to as the NORC (Naturally Occurring Retirement Community) Project at Marian Road high-rise. NORC is a national program model that focuses on equipping adults to age in place and building the capacity of the community to support them in that process. The NORC at Marian Road places a strong emphasis on resident involvement with priorities set by residents and new initiatives capitalize on the economy of scale created by the concentration of individuals with similar needs. Led by the Atlanta Regional Commission's (ARC) Division on Aging, the primary partners on this pilot include AHA, Visiting Nurse Health System, Piedmont Hospital, Jewish Family and Career Services, Jewish Federation of Greater Atlanta and The Habitat Company (AHA's PMCO for Marian Road) .

In partnership with AHA, the Atlanta Regional Commission (ARC) secured a $375,000 ROSS (Resident Opportunities and Self-Sufficiency) grant during FY 2007 that it will use to expand the focus of the NORC project to two additional AHA high-rise communities, namely, Cheshire Bridge Road and Piedmont Road. In addition, the NORC will be coordinating a "Leadership Marian" project to provide training to residents on leadership development, diversity, conflict resolution, team building and community development. A trained facilitator and translators will be hired to assist with developing better relationships and leadership among the residents at Marian Road and building strong "resident ambassadors" that can continue to keep the diverse ethnic population at Marian Road engaged and involved in the community.

# PART VII: ONGOING BUSINESS OPERATIONS

Using its MTW flexibility, AHA will continue to make business enhancements that improve the ongoing operation and economic viability of the agency and the ongoing operation of AHA-owned communities. These activities include but are not limited to enhancements to policies, business systems, and enhancements in the areas of technology and financial reporting and analysis.

## Supporting Activities

### A1. Asset Management Under The New Operating Subsidy Rule

For over ten years, AHA has been transforming the agency from a public sector/government public housing model to a private sector real estate business model. As a result, AHA has become a diversified real estate company, with a public mission and purpose. The Moving to Work designation and regulatory relief has allowed AHA to be more nimble in the Atlanta real estate market to leverage real estate opportunities and private sector investment opportunities. Moreover, the MTW relief has allowed AHA to become a more effective and efficient business enterprise. Since 2001, all of AHA-owned public housing properties are managed by professional private management companies, including their day to day management, maintenance and capital improvement. AHA commenced decentralizing its operations in FY1996 and as of FY2002 began preparing property-based financial statements.

Since the fall of 1994, AHA has begun the process of transforming and revitalizing all of its distressed public housing properties to healthy mixed-income communities. All of the revitalization has been implemented through public/private partnerships, resulting in the creation of market competitive communities, with a seamless affordable component. These new mixed-income communities are owned by public/private partnerships, with the private partner, as the managing general partner.

To date, 12 of the family communities have undergone transformation and one family community has been sold, leaving 12 family communities and 17 elderly/disabled communities to be transformed. Such additional revitalizations are the cornerstones of AHA's MTW Business Plan.

Under the New Operating Subsidy Rule, HUD is establishing a new regulatory structure related to project-based accounting, project-based management and asset management, including changes that will limit the property management and asset management fees that can be charged to the properties by the PHA's Central Office. HUD's approach to the New Operating Subsidy Rule methodology focuses strictly on property operations without regard to the agency's overall strategy and without considering the full life cycle of the property. The New Operating Subsidy Rule states that the funding methodology reflects "the costs of services and materials needed by a well-run PHA to sustain the project." Given AHA's heavy focus on repositioning and revitalizing its properties, AHA will continue to incur expenditures associated with comprehensive revitalization, including relocation of families, demolition of properties, development related activities and human services support for affected families. None of these expenditures was contemplated by the Harvard Study, the New Rule, or HUD's implementing regulations and notices. The Harvard Study assumes that the properties are in market competitive conditions and that an agency is asset managing such properties. It is essential that AHA continues to maintain the full flexibility (financial and other) provided under its MTW Agreement with HUD.

Throughout its MTW Agreement period, AHA will continue to exercise its regulatory flexibility as to how it has implemented project-based accounting, project-based management and asset management systems as contemplated under HUD's recently adopted Asset Management/Project Based Accounting Rule.

**A2. Project-based Accounting and Financial Systems/Quarterly Financial Statements by Business Line.** During FY 2007, AHA continued to refine its project-based accounting and management system. With this system, property level budgets and financial statements are available for each AHA-owned property. In FY 2008, further improvements will be made to AHA's information technology/financial reporting environment to expand beyond the property level. These and other enhancements to AHA's ORACLE automated system will also allow AHA to produce quarterly financial statements across the entire organization for all program operations.

**A3. Fee-for-Service Methodology.** During FY 2006, HUD approved AHA's request to use its new "fee-for-service" methodology for allocating costs to HUD grants and programs for administration and overhead. This new methodology uses a fee-for-service approach to replace the cumbersome salary allocation systems traditionally found in public housing agencies. The fee-for-service approach aligns with the purposes of HUD's MTW program which include "the flexibility to design and test various approaches for providing and administering housing assistance that reduce cost and achieve greater effectiveness in Federal expenditures." AHA's fee-for-service system charges and recovers AHA's corporate costs associated with administering HUD programs and grants. Under this system, AHA charges each property, program, or grant a fixed rate for administration and will continue the implementation of this methodology throughout the life of its MTW Agreement. AHA will continue to implement and refine the methodology in FY 2008.

**A4. Utility Allowance Waiver.** Based on the existing condition of the AHA real estate portfolio including aging building infrastructures, minimum insulation and poor air circulation, AHA will consider adjusting the tenant utility allowances to account for the utility usage required to maintain quality of life. The physical condition and obsolescence of the distressed public housing developments are key factors supporting the Quality of Life Initiative and the decision to demolish the majority of the family properties. AHA is also dedicated to improving quality of life for residents in its longer-term hold properties. During FY 2008, AHA will develop and pilot alternative methods for encouraging energy efficient living while reducing the burden of utility expenses on residents living at properties with obsolete systems and infrastructure. The changes to the utility allowances will include an examination of the materiality of excess utility revenue, the associated administrative costs for maintaining a system for charging excess utilities, and the impact of excess utility charges on the total tenant payment given the increase to the average rent.

**A5. Energy Performance Contracting.** In light of the dynamic impact of AHA's revitalization program and Quality of Life Initiative on the ongoing operations of AHA-owned public housing assisted properties, AHA will consider establishing and managing its own energy performance program. This program may include, but will not be limited to, self-financing and implementing additional improvements at properties that AHA will continue to own and operate on a long-term basis.

**A6. Procurement Enhancements.** AHA will continue to comply with procurement regulations at 24 C.F.R. 85.36 as modified by other applicable regulations and by AHA's MTW Agreement and related agreements, implementation protocols, and applicable waivers. However, AHA will continue to make enhancements to its procurement policies and procedures to improve efficiency and effectiveness. AHA set its micro-purchasing level at $5,000 and will utilize contracts with terms in excess of five years for certain strategic services.

**A7. Financial Operations.** During FY 2008, AHA will continue to combine the income from three programs into a Single Fund in carrying out the activities of its MTW Agreement and related Plans and implementation protocols. Low income Operating Subsidy and related income from property operations, Housing Choice Voucher Income, and Capital Fund Program Income will be used interchangeably for eligible MTW purposes. AHA will also use other program funds such as HOPE VI, and Development Grants, to carry out activities related to those grants which are aligned with AHA's Business Plan. Sources and amounts of funding for AHA's FY 2008 consolidated budget statement are included in **Appendix O**, and are further explained below.

**Low income Operating Subsidy and Related Income.** In 2006 HUD changed the manner in which it funds Public Housing Agencies (PHAs) and converted to a calendar year. Since AHA operates on a fiscal year from July 1 through June 30, AHA's Fiscal Year crosses two federal funding years.

HUD implemented a new Low income Operating Subsidy funding methodology beginning in 2007. This new funding methodology introduced project (property) based calculations for determining HUD subsidy. AHA submitted the calculation of its Low income Operating Subsidy for Calendar Year 2007 in September 2006. HUD is using this calculation as the basis for funding January through December 2007, which includes the first six months of AHA's Fiscal Year 2008. Based on this calculation and after adjusting for a HUD-imposed $2.9 million transitional funding reduction, AHA estimates that it will be eligible for $37.8 million in 2007 operating and utility subsidy before proration.

HUD has not yet finalized subsidy levels for 2007; but using HUD's current estimate of an 82.9% proration, AHA expects to receive approximately $32 million in low income operating subsidy for 2007, of which $16 million will be available for AHA's FY 2008.

The second half of AHA's FY2008 runs from January 1, 2008 through June 30, 2008. Calculation of this subsidy will not be submitted to HUD until September 2007 and will be based on property occupancy for AHA's FY2007, adjusted for properties coming off line. At this time, HUD has published neither the monthly Property Allowance Levels (PEL) nor the proration factors for 2008. AHA does know, however, that HUD will not impose a transitional funding reduction in 2008. A rough estimate of total FY 2008 Operating subsidy is $28.6 million, with $14.3 million available in AHA's FY 2008. Combined with the funds for the last six months of 2007, this should provide AHA with $30 million in Operating Funding for FY 2008.

**Housing Choice Voucher Related MTW Income.** AHA estimates that it will receive $119.7 million in Housing Choice Voucher Related income in the MTW Block Grant in FY2008. This funding was calculated using the methodology outlined in Appendix A of AHA's MTW Agreement. Because HUD now funds on a calendar year basis, a separate calculation was used for the first and the last six months of AHA's Fiscal Year. The first six months (July – December 2007) reflect MTW Voucher funding rates identified by HUD for 2007 including a 94.6% proration and with no inflation adjustment. The last six months were estimated using the 2007 MTWPUC (MTW Per Unit Count) and assumes a no inflation adjustment and the same level of proration.

**Capital Funding Program Related MTW Income.** Based on current funding methodology, AHA estimates that it will receive a $12.3 million grant award from the Capital Funding Program (CFP) in the HUD's Federal Fiscal Year 2007 MTW Block Grant. This is a reduction of **$0.8** million resulting primarily from taking Grady Homes offline and removing those units from the calculation of this year's CFP grant award. The Consolidated Budget is included in **Appendix L** and the Capital Planning Budget is included in **Appendix M.**

**Replacement Housing Factor Funds.** AHA will use Replacement Housing Factor (RHF) grants for Fiscal Years 2003-2007 as part of the HOPE VI revitalizations of McDaniel Glenn and Grady Homes. The RHF Plan that identifies the proposed use of these funds has been provided to HUD under separate cover.

**Housing Choice Budget Utilization Benchmark.** AHA's MTW Housing Choice Budget Utilization benchmark requires that the expenditure of fiscal year Housing Choice Annual Budget allocation for MTW vouchers utilized for MTW eligible activities be greater than or equal to the target benchmark of 98%. In its FY 2007 Implementation Plan, AHA added clarifying language for this benchmark. As part of the FY 2008 Implementation Plan, AHA has included further clarifying language that the 98% expenditure rate only applies to vouchers that are fully funded during AHA's entire fiscal year, and that any new vouchers received intermittently during the fiscal year are excluded from the 98% requirement until the following fiscal year until such time that a 12-month period has elapsed (see **Appendix Q**). AHA is making this clarification in light of changes that HUD has made in funding vouchers based on a calendar year versus a fiscal year.

**A8. Enhanced Accessibility Initiative.** AHA is committed to making its facilities and programs accessible to persons with disabilities. AHA's commitment is reflected in its Accessibility Policies included in its Statement of Corporate Policies Governing the Leasing and Residency of Assisted Apartments (Statement of Corporate Policies) – (**Appendix N**). AHA will continue to enhance its accessibility efforts in FY 2008, including continuation of the following strategies: 1) continued implementation of AHA's transition plan for ongoing physical accessibility improvements; 2) continued oversight of the reasonable accommodations process and related activities to optimize positive outcomes of disabled applicants and residents; 3) developing and implementing new procedures that will improve AHA's ability to effectively address the needs of applicants and residents with disabilities; 4) developing and implementing a proactive strategy to enhance the effective communication with the families we serve; 5) implementation of additional strategies for enhanced resident/participant awareness of their disability-related rights; 6) expanded training program for employees of AHA and its private management partners regarding disability-related concerns; 7) exploring and implementing methods by which persons with mobility impairments may learn of opportunities for apartment units that are more accessible to them and 8) assessment of the needs of mobility-impaired applicants and residents and developing plans to address identified needs. As part of AHA's strategy for accomplishing these efforts, AHA will implement activities pursuant to a voluntary compliance agreement with HUD, a four-year agreement which became effective on March 15, 2007.

AHA identifies and prioritizes the needs of eligible residents and applicants who require the accessibility features of a UFAS-Accessible Unit in a centralized database according to the date and time of a resident's transfer request, or the date and time or ranking by lottery, as applicable, of an applicant's application. This database ("UFAS-Accessible Unit Database") maintains data on such residents and applicants for both AHA-Owned Affordable Communities and privately owned, market rate Mixed-Income Communities (Signature Communities). The UFAS-Accessible Unit Database was established to provide 1) direct assistance to residents and applicants with disabilities, upon request, in the application for an available UFAS-Accessible Unit in any Affordable Community or Signature Community; 2) a process for notifying and referring residents from the database to the Affordable Communities and Signature Communities with openings on each community's respective site-based UFAS Waiting Lists; 3) a process for notifying and referring applicants from the database to the Affordable Communities and Signature Communities with openings on each community's respective site-based UFAS Waiting Lists; and 4) a method for monitoring the maximization of occupancy of AHA-assisted units that are UFAS-Accessible Units, in Affordable Communities and Signature Communities, by residents who require the accessibility features of those units. Complementing the UFAS-Accessible Unit Database, each Affordable Community and each Signature Community will maintain a separate, site-based UFAS-Accessible Unit Waiting List for eligible applicants and residents with disabilities who require UFAS-Accessible Units. At least five percent (5%) of all AHA-assisted units in Signature Communities will be available to eligible and qualified applicants and residents with disabilities who require UFAS-Accessible Units, provided the AHA-assisted unit count remains within the limits established by the governing legal and financial agreements for each property should the percentage exceed five (5%). The implementation protocols as they apply specifically to the Affordable Communities and the Signature Communities are outlined in Part II, Article Five of the Statement of Corporate Policies.

### A9. Corporate Policies Governing Eligibility, Occupancy, and Program Administration

***Statement of Corporate Policies Governing the Leasing and Residency of Assisted Apartments*** **(Statement of Corporate Policies).** The Board of Commissioners adopted the Statement of Corporate Policies on June 16, 2004, and approved three subsequent revisions of this policy document; the first on April 25, 2005, the second on December 12, 2005, and the third on April 25, 2007.

Substantive provisions proposed for approval in April 2007 will include amendments clarifying AHA's policies that demonstrate its ongoing commitment to federal requirements administered by HUD's Office of Fair Housing and Equal Opportunity. Such amendments will incorporate changes in the admissions, occupancy and transfer policy; reasonable accommodation policy; effective communication policy; pet policy; dwelling lease addendum requirements; and grievance procedures. Other key provisions of the Statement of Corporate Policies will include Federal Limited English Proficiency requirements, as applicable to AHA's jurisdiction; clarifications of existing policies related to self-employment income, the treatment of income from assets, and the general definition of Family; a policy that will permit the establishment of standard deductions for determining adjusted annual income; and the elimination of interim re-certifications under certain circumstances; expanded timeframes for re-certifications. (A copy of the Statement of Corporate Policies is included in **Appendix N**.)

**Administrative Plan Governing the Housing Choice Voucher Program (Administrative Plan).** The Board of Commissioners adopted the Administrative Plan on August 25, 2004, and approved five subsequent amendments of this policy document; the first on April 25, 2005, the second on September 9, 2005, the third on December 12, 2005, the fourth on March 28, 2006, and the fifth on April 25, 2007.

Key provisions of the Administrative Plan will include Federal Limited English Proficiency requirements, as applicable to AHA's jurisdiction; clarifications of existing policies related to self-employment income, the treatment of income from assets, and the general definition of Family; a policy that will permit the establishment of standard deductions for determining adjusted annual income; and the elimination of interim re-certifications under certain circumstances; expanded timeframes for re-certifications.

In addition, certain revisions of the Administrative Plan will address policies that are unique to the Housing Choice Program. These program-related revisions will include language that clarifies that separate payment standards can be implemented within submarket areas within AHA's jurisdiction; sets forth the date when changes in payment standards will go into effect for residents (i.e. at the next annual recertification); requires that inbound voucher holders porting into AHA's program must meet all of AHA's eligibility criteria including the CATALYST work/program requirement; limits the number and timing of program moves a Housing Choice participant may make; clarifies that AHA utilizes the AHA Local Inspection Standards and not the HUD Housing Quality Standards; institutes a landlord screening and eligibility process; requires landlords and owners to utilize various AHA "paperless" systems that can be accessed over the Internet; and establishes various technical amendments related to terms and conditions effecting participant use of a housing voucher. (A copy of the revised Administrative Plan is included in **Appendix O**.)

**Violence Against Women Act (VAWA).** The *Violence Against Women and Department of Justice Reauthorization Act of 2005* (Public Law No: 109-162) promulgates requirements in the law that serves and protects the needs of child and adult victims of domestic violence, dating violence, sexual assault, or stalking. AHA developed administrative procedures for its housing programs including public housing and housing choice during FY 2007 in compliance with VAWA, which will be fully implemented in FY 2008.

**A10. 4 to 1 Elderly Admissions Policy at AHA's High-Rise Communities.** AHA will continue to implement strategies at its high-rise communities to address the complex social issues associated with mixing seniors and young disabled persons. These strategies include: (1) implementing a 4:1 elderly/almost-elderly admissions policy (Elderly Admissions Policy), (2) implementing permanent percentage-based mixed-population designations, (3) implementing permanent elderly-only designations, and (4) implementing permanent non-elderly disabled only designations. AHA commenced implementation of a 4:1 elderly/almost elderly admissions policy at its high-rise communities as of March 1, 2006. AHA included the Elderly Admissions Policy in both its Business Plan and FY 2006 Implementation Plan. This admissions policy allows the PMCOs to admit 4 elderly (62 and older) or almost elderly (55-61) residents on the waiting list before admitting a young disabled resident until such time as an optimal mix of elderly/almost elderly and young disabled residents is reached for the community.

**A11. Permanent Designated Housing.** AHA plans to designate one or more of the communities listed in **Appendix P** as percentage-based mixed population, elderly only or non-elderly disabled only. AHA will implement permanent designations for existing units to support the repositioning of its senior high-rise communities and for new units in the development of designated housing in connection with its revitalization efforts. "Elderly", "Almost Elderly" and "Non-Elderly Disabled" (Young Disabled) have the same respective definitions as set forth in AHA's FY 2006 Implementation Plan. AHA will comply with the alternate process for designating public housing assisted units as outlined in **Appendix Q** of this annual plan.

**A12. Affordable Fixed Rent Demonstration.** AHA will use research and financial analysis conducted in FY 2007 to select one or more of its conventional public housing communities for participation in an affordable fixed rent demonstration that AHA will launch during FY 2008. The decision to implement a fixed rent structure will be based on several property-related factors, including, but not limited to, location, size, operating cost, market demand, and community demographics. Prior to implementing this initiative, AHA will conduct a rent impact analysis, obtain board approval, and submit the information to HUD as required by its MTW Agreement.

**A13. Enhanced Business Systems.** As a matter of routine operations, AHA and the PMCOs will continue the implementation of new and enhanced policies and operating procedures established under CATALYST such as the $125 minimum rent increase, elderly income disregard, 4 to 1 elderly admissions policy, enhanced criminal screening, enhanced health and safety standards, and the work/program participation requirement. During FY 2008, AHA will continue to refine its business processes to ensure the effective and efficient implementation of these policies. REM will manage the ongoing nurturing of AHA's partnership with the PMCOs including articulation of owner's objectives and active involvement with monthly, quarterly and annual feedback on performance utilizing quantitative and qualitative data and associated analysis. With the goal of improving site-based operational quality and consistency particularly in the areas of intake and re-certification, we will continue the development and implementation of an AHA Occupancy Guidebook for use by the PMCOs.

**A14. Elderly Income Disregard.** On October 1, 2004, AHA implemented an income disregard for the Public Housing and Housing Choice programs for employment income earned by elderly residents or participants on fixed income. AHA will continue to recognize and implement this income disregard as part of PMCOs routine operations during FY 2008.

**A15. $125 Minimum Rent.** Effective October 1, 2004, AHA raised its minimum rent from $25 to $125 under its Public Housing and Housing Choice programs as well. Households on fixed incomes, where all members are either elderly or disabled, are exempt from the minimum rent increase and their total tenant payment continues to be based on 30% of their adjusted gross incomes. Hardship waivers may be granted under certain limited circumstances, on a case-by-case basis, based on criteria established in AHA's Administrative Plan. AHA will keep its minimum rent at this level for FY 2008, and will continue to implement the $125 minimum rent as part of PMCOs routine operations.

**A16. Enhanced Real Estate Inspection Systems.** AHA will continue to refine and improve the quality assurance (QA) inspections process for AHA-owned communities. Through its integrated inspections system, AHA will continue to inspect units at each of its communities, at least once per year. A description of the integrated inspections system is described in further detail in **Appendix C**.

**A17. Comcast Cable Partnership.** AHA will continue to use technology at the high-rise communities to improve the quality of life for the elderly and disabled. AHA, working through the cable franchise for Atlanta, has established two primary cable information channels at each of its high-rise communities. One channel serves as a "security" channel and is dedicated to security cameras at various locations within each community enabling residents to monitor their own community. The other channel serves as an "information channel" and provides a mechanism to broadcast information and announcements for residents such as recorded public hearings, health information, alerts, fire prevention education, and management announcements.

**A18. Video Call Down Systems.** To date, AHA has installed seven video call down systems at its family communities. Call down systems are a network of cameras with speakers that are monitored by a third party contracted firm to curtail crime from being committed on-site at the conventional public housing communities. The system allows a third party contractor as well as site staff to have visual access to each property being monitored and the ability to actually "call down" and speak to anyone suspicious or observed committing a crime. The Atlanta Police Department has access to the call down systems and monitors AHA communities periodically. During FY 2008, AHA and the PMCOs will continue to focus on ways to optimize the full functionality of the combined video and call down capabilities.

**A19. Organizational Initiatives.** AHA will continue to implement the following organizational initiatives to further the success of the implementation of its Business Plan:

- Communications Plan - supporting the implementation of policy changes and initiatives that impact families and stakeholders
- Corporate Culture Project - continuing AHA's evolution as an organization that values professionalism, integrity, accountability and collaborative teamwork
- Human Resources Development – building the organizational human resource capital necessary for the successful implementation of AHA's Business Plan.

## IMPLEMENTATION PROTOCOLS

Since the execution of its Moving to Work (MTW) Agreement, AHA has continued to exercise its MTW relief by implementing a number of activities and protocols focused on achieving the MTW objectives set forth in the 1996 Appropriations Act to reduce cost and achieve greater cost efficiencies in Federal expenditures; advance families toward economic self-sufficiency; and increase quality housing choices for low-income families. The activities are detailed in AHA's Business Plan called CATALYST submitted to HUD June 2004, and in subsequent CATALYST Implementation Plans. In addition, AHA and HUD have negotiated a number of implementation protocols based on the goals, objectives and activities set forth in AHA's Business Plan. AHA and HUD agreed that in order to facilitate innovation, such implementation protocols are needed and as they are established, such implementation protocols would become part of the operating procedures upon which AHA and HUD would rely during the MTW period, as such period may be extended. The implementation protocols are sometimes reviewed by HUD intermittently during the plan year outside of the annual plan review process.

At the request of its HUD-appointed MTW Liaison, Eugene Geritz, AHA assembled and included detailed descriptions of existing implementation protocols (both adopted and those submitted for review) in its FY 2007 Implementation Plan. **Appendix Q** of this plan contains additional implementation protocols for HUD's review as well as implementation protocols that have been adopted. Moving forward, implementation protocols that have been adopted will be included in the appendices of AHA's MTW Annual Plans. In addition to these implementation protocols, numerous clarifications have been made between HUD and AHA representatives related to AHA's MTW Agreement and the implementation of certain MTW activities. These clarifications have been prepared and adopted and are on file with the implementation protocols at the AHA corporate office. A summary catalog of the implementation protocols and these clarifications are contained in **Appendix R**.

## CONCLUSION: MEASURING SUCCESS - MTW BENCHMARKING

In FY 2006, AHA engaged Dr. Thomas D. Boston of the Boston Research Group (BRG), Inc., to conduct an independent study of the success of AHA's MTW program – the MTW Benchmarking Study. Dr. Boston is investigating the impact of AHA's initiatives work under the MTW Program on improving neighborhoods and communities and on the quality of life of families that AHA serves. The benchmarking study is measuring quality of life changes for families associated with AHA's revitalization activities and whether the change in environment improves their quality of life. The MTW Benchmarking Study is also measuring impact of AHA's revitalization program on a property-by-property basis and changes in levels of crime, poverty, and other social ills associated with concentrated poverty. The study includes a baseline study (FY 2006), interim report (FY 2008), and final report (FY 2010).

The FY 2008 study will build upon and further refine the analytical methods used in the development of the 2006 baseline report. It will also introduce several new techniques that are designed to measure the impact of MTW Waiver Relief received by AHA and measure AHA's attainment of its three MTW objectives: cost efficiency, self-sufficiency and housing opportunity. The new analytical techniques include a Cost-Benefit Analysis (CBA) of MTW waivers because CBA is perhaps the most effective way of measuring the cost efficiency of public policies. Secondly, BRG has developed a Community Attribute Index© (CAI) that will be used to measure the characteristics of communities where assisted families live or have been relocated. The CAI is uniquely designed to measure the extent to which families move to neighborhoods of greater opportunity - - a second major objective of AHA's MTW program. The third innovation of the 2008 study is a family Self-Sufficiency Index© (SSI). The SSI has been developed by Dr. Boston to measure the movement of assisted families towards self sufficiency - - the third objective of AHA's MTW program. These three innovations, CBA, CAI and SSI, will appear in the 2008 Benchmarking Study. Combined the new metrics will facilitate an evaluation of the extent to which AHA has achieved cost efficiency, self-sufficiency, and housing opportunity for its assisted families and provide a way of measuring the impact of MTW waiver relief.

**CBA Cost-Benefit Analysis and Program Efficiency.** CBA is used widely to evaluate the relative efficiency of large public sector programs. However, to our knowledge, this will be the first time that CBA has been used to evaluate the impact of MTW. It will serve as the fundamental method used to analyze the statutory and regulatory relief provided under the MTW Agreement. Welfare economists argues that an action is Pareto Superior, i.e. society is better off if it improves the well-being of some stakeholders without making others worse off, and even if some stakeholders incur losses, society is still better off if the benefits of winners are large enough to compensate those who lose. The decision criterion we will use to judge whether society is better off is the Kaldor-Hicks standard of "potential Pareto Superiority." To use CBA we will also establish a control group to estimate the "do nothing scenario." The change in socioeconomic status resulting from the implementation of waivers will be compared to the socioeconomic status associated with the do nothing scenario. The net difference will be monetized (where possible) and discounted to its present value. The objective is to determine whether the net social benefit of a particular waiver is positive, whether it has a minimal effect on stakeholders who lose, and whether it has the highest internal rate of return in comparison to other possible alternatives.

In several recent reports by BRG and a forthcoming research paper written by Dr. Boston, CBA is used to evaluate the impact of AHA's revitalization activities. The studies examine costs and benefits that have accrued to society as a result of AHA revitalizing the East Lake Meadows public housing project into The Villages of East Lake (a mixed-income housing development). A control group, made up of three similarly situated housing projects that did not undergo revitalization, was used to estimate what would have happened at East Lake Meadows had revitalization not occurred. Actual 1998 to 2004 costs and revenues associated with the $131 million investment were used and projected to the year 2012. Along with evaluating the costs and revenues of operating the new mixed-income housing development, the net differences in outcomes between families in the control group and East Lake Meadows families were monetized and discounted to their present value. Monetary values were assigned to outcomes such as the net benefit of lower crime and the added value of higher employment. We also monetized the added value of improvements made in the quality of learning and primary education, and of using housing vouchers. Public housing assisted families who were relocated from East Lake Meadows when it was demolished were examined longitudinally over a seven-year and ten-year period starting in 1995. Their long-term access to housing assistance, socio-economic mobility and the quality of their destination neighborhoods were analyzed. The conservative estimate of the net gain in social welfare resulting from the revitalization of East Lake Meadows was $57 million.

CBA will be used to evaluate the following MTW initiatives made possible by AHA's MTW Agreement:

- Mixed-income conversions and financing
- Project based rental assistance
- Innovative subsidy strategies
- Housing choice fair market rents
- Housing choice fixed subsidy initiative
- Work program requirements
- Affordable fixed rent demonstration
- 4 to 1 elderly admissions policy
- MTW block grant
- Minimum rent increases

**CAI - Community Attribute Index.** CAI will be used to evaluate the quality of neighborhoods where assisted families relocated. Several years ago BRG developed a Quality of Life Index (QLI) to express quantitatively a broad range of variables that reflect a family's socio-economic status and the quality of the neighborhood where the family lives. The idea was borrowed from the United Nations Human Development Index (HDI), which measures the achievement of nations along dimensions that express the fulfillment of the human potential and the opportunities available to citizens of a country. The

QLI has two components; a family Self-Sufficiency Index (SSI) and a Community Attribute Index (CAI). Dr. Boston received a grant from the MacArthur Foundation to further develop the QLI, apply it to evaluate residential mobility programs of the Chicago Housing Authority and refine the index so that might be used by Public Housing Authorities across the country. Research on the CAI has been completed. This index measures a broad range of community characteristics in a parsimonious and quantitative manner. The value of the index varies from zero to one and each census tract where an assisted family lives has been scored by the index.

To construct the CAI, 165 variables were used that express the characteristics of neighborhoods and communities. Each variable was geo-coded to the census tract level by using GIS software. Factor analysis was then used to reduce the 165 variables to a smaller number of essential variables that express the attributes of communities. Six main variable categories were identified; economic opportunity, poverty status, educational attainment, housing and population mix, family stability, and crime rate. The fifteen variables were organized by these categories and each variable was weighted according to its factor loading score.

CAI score will be used to evaluate the impact of the following AHA MTW initiatives:

- Mixed-income conversions
- Project-based rental assistance as a development tool
- Innovative subsidy strategies
- Housing choice fair market rents
- Housing choice fixed subsidy initiative
- Work program requirement
- Affordable fixed rent demonstration
- Minimum rent increases

**SSI – The Family Self-Sufficiency Index.** Self-sufficient families have many common attributes in comparison to non-self-sufficient families; they typically live in neighborhoods of greater opportunity, they do not depend on public assistance, they work full time, their earned incomes are higher and their employment profiles are more stable, a smaller percent of that total household income is from non-labor sources, their rent subsidies are lower, and ultimately they leave housing assistance for housing in the private market. The SSI measures the attainment of families towards the goal of self-sufficiency. It is developed in a manner that is similar to the CAI. The difference is that the metrics included in the CAI express the characteristics of communities where families live, while the SSI is based on variables that are exclusively related to the attributes of assisted families as derived from administrative data and data on supportive services. The 2004 report recorded information on 80 variables that were related to the attributes of individuals, families and households. The 2008 report will use factor analysis to organize these and other variables into an index that is designed to measure the extent to which families are moving towards self-sufficiency. The index will rank each family on a scale of zero to one based on its relative degree of self sufficiency.

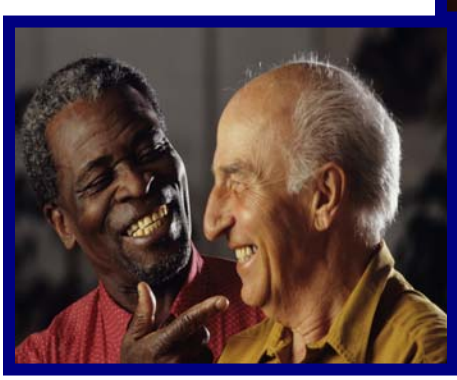
SSI will also be used to evaluate the impact of the following AHA MTW initiatives:

- Mixed-income conversions
- Project-based vouchers
- Innovative subsidy strategies
- Housing choice fair market rents
- Housing choice fixed subsidy initiative
- Work program requirements
- Affordable fixed rent demonstration
- MTW block grant
- Minimum rent increases

NOTE: The following appendices include additional information required by HUD to be included in the MTW Annual Plan:

- **Appendix A** – MTW Annual Plan Reference Guide
- **Appendix S** – Board Resolution
- **Appendix T** – Certifications
- **Appendix U** – Submissions Required for Receipt of Funds
- **Appendix V** – HUD Project Numbers for AHA Properties and Communities


# Atlanta Housing Authority
# FY 2008 CATALYST Implementation Plan
# Appendices
**(Board Approved)**



***"Healthy Mixed-Income Communities"***

Atlanta Housing Authority

CATALYST

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Appendix V: HUD Project Numbers for AHA Properties and Communities

## MTW ANNUAL PLAN CROSS REFERENCE GUIDE

| ANNUAL PLAN | REQUIREMENT | LOCATION |
|---|---|---|
| **I. HOUSEHOLDS SERVED** | | |
| | A. Number and characteristics of households served at beginning of period, by:<br>- unit size<br>- family type (family vs. elderly or disabled<br>- income group (<30: 30-50; 50-80;>80)<br>- housing type (LRPH; leased, other)<br>- race & ethnicity | N/A for FY 2008[1] |
| | B. Identify number and characteristics of households on waiting lists (all housing types). Discuss waiting list issues and proposed actions | Same as above. |
| | C. Number projected to be served at end of period | Same as above. |
| | D. Narrative discussion/explanation of change | Same as above. |
| **II. OCCUPANCY POLICIES** | | |
| | A. 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 | Appendices N & O |
| | B. Statement of Rent Policy | Appendices N & O |
| | | |
| **III. CHANGES IN THE HOUSING STOCK** | | |
| | A. Number of units in inventory at beginning of period by program (LRPH, leased, other) | No longer required.[2] |
| | B. Projected number at end of period by program | Same as above. |

[1] As part of the approval of AHA's FY 2006 CATALYST Implementation Plan, HUD approved AHA to replace this information with its MTW Benchmarking Study being conducted by the Boston Research Group, Inc. The study will include three reports: an FY 2006 Baseline Report, an FY 2008 Interim Report and an FY 2010 Final Report.

[2] As part of the approval of AHA's FY 2006 CATALYST Implementation Plan, HUD approved elimination of the requirement for AHA to provide this information as part of its annual plans.

| ANNUAL PLAN | REQUIREMENT | LOCATION |
|---|---|---|
| | | |
| **IV. SOURCES AND AMOUNTS OF FUNDING** | | |
| | A. Identify/discuss all sources and amounts of funding included in consolidated budget statement | Appendix L |
| | B. Identify/discuss sources, amounts, and planned uses of special purpose funds outside the consolidated budget (e.g., DEP) | Same as above. |
| | C. Consolidated Budget Statement | Same as above. |
| **V. USES OF FUNDS** | | |
| | A. Previous year expenditures by line item | Appendix L |
| | B. Planned expenditures by line item | Same as above. |
| | C. Description of proposed activities/investments by line item/explanation of change from previously approved plan | Same as above. |
| | D. Reserve balance at beginning of year. Discuss adequacy of reserves. | Same as above. |
| **VI. CAPITAL PLANNING** | | |
| | A. Describe major capital needs and projects, estimated costs, and proposed timetables | Appendix M |
| | B. Identify planned expenditures | Same as above. |
| | C. Demolition and Disposition Requests, if planned | Appendices J<br>Part I of Plan, Page 25<br>Part V of Plan, Pages 41-42 |
| | D. Homeownership activities, if any | Part I of Plan, Pages 25-27 |
| **VII. MANAGEMENT INFORMATION FOR OWNED/MANAGED UNITS** | | |
| | **A. VACANCY (OCCUPANCY) RATES** | |
| | 1. Occupancy rates by property beginning of period | Appendix C |
| | 2. Narrative: issues and proposed action | Same as above. |
| | 3. Target rates by property at end of period | Same as above. |
| **B. RENT COLLECTIONS** | | |
| | 1. Rents uncollected (%) beginning of period | Appendix H |
| | 2. Narrative: issues and proposed actions | Same as above. |
| | 3. Target % at end of period | Same as above. |
| **C. WORK ORDERS** | | |

| ANNUAL PLAN | REQUIREMENT | LOCATION |
|---|---|---|
| | 1. Response rates beginning of period<br>• % emergency within 24 hrs<br>• % regular within 30 days | Appendix C |
| | 2. Narrative: issues and proposed actions | Same as above. |
| | 3. Target rates at end of period | Same as above. |
| **D. INSPECTIONS** | | |
| | 1. Description of inspection strategy | Appendix C |
| | 2. Planned inspections (% this FY) | Same as above. |
| | | |
| **E. SECURITY** | | |
| | 1. Narrative: security issues and proposed Actions | Appendix C |
| **VIII. MANAGEMENT INFORMATION FOR LEASED HOUSING** | | |
| **A. LEASING INFORMATION** | | |
| | 1. Units under lease (%) beginning of period | No longer required.[3] |
| | 2. Target lease up rate at end of period | Same as above. |
| | 3. Plans regarding:<br>Ensuring rent reasonableness<br>Expanding housing opportunities<br>Deconcentration of low-income families | Appendices K & O |
| | 4. Issues and proposed actions | No longer required.[3] |
| **B. INSPECTION STRATEGY** | | |
| | 1. Description of inspection strategy, including:<br>a) Planned inspections completed (% this FY) by category:<br>• Annual HQS inspections<br>• Pre-contract HQS inspections<br>• HQS Quality Control Inspections<br>b) HQS Enforcement | Appendix K |

[3] As part of the approval of AHA's FY 2006 CATALYST Implementation Plan, HUD approved elimination of the requirement for AHA to provide this information as part of its annual plans.

| ANNUAL PLAN | REQUIREMENT | LOCATION |
|---|---|---|
| | | |
| **IX. Resident Programs** | | |
| | 1. Description of activities | Parts VI of Plan |
| | 2. Issues and proposed actions | Parts VI of Plan |
| **X. Other Information as Required by HUD** | | |
| | A. Board Resolution Adopting Plan Certifying that Public Hearing Requirements were met | Appendix S |
| | B. Required Certifications and other submissions from which the Agency is not exempted by the MTW Agreement | Appendix T |
| | C. Submissions required for the receipt of funds | Appendix U |

## Appendix B: AHA Conventional Public Housing Communities (as June 30, 2006)[1]

| High-Rise Communities | High-Rise Communities In Pre-development* | Family Communities | Family Communities Undergoing Revitalization** | Family Communities In Pre-development |
|---|---|---|---|---|
| Barge Road | Antoine Graves | Bankhead Courts | McDaniel Glenn | University Apartments |
| Cheshire Bridge | Graves Annex | Bowen Apartments | | |
| Cosby Spear Towers | John O. Chiles | Englewood Manor | | |
| East Lake Towers | M.L. King Tower | Herndon Homes | | |
| Georgia Avenue | | Hollywood Courts | | |
| Hightower Manor | | Jonesboro North | | |
| Juniper & 10th | | Jonesboro South | | |
| Marian Road | | Leila Valley | | |
| Marietta Road | | Martin Street Plaza | | |
| Palmer House | | Thomasville Heights | | |
| Peachtree Road | | U-Rescue Villa | | |
| Piedmont Road | | Westminster | | |
| Roosevelt House | | | | |

*These communities are in pre-development, i.e. AHA has made an internal decision and initiated steps to redevelop these communities. The John O. Chiles Main Building received a Low Income Housing Tax Credit allocation in September 2006.

**These communities are already in an active redevelopment process including master planning, resident relocation, demolition, disposition, construction, and lease-up.

[1] AHA also owns a six-unit building known as the John Hope Model Building. This building was part of the former John Hope Homes Community which has since been revitalized.

## Appendix C: Management Information for Owned/Managed Units and Assisted Units at Mixed-Income Communities

### Occupancy Rates

Average Adjusted Occupancy Rate: As of June 30, 2006, AHA had an average adjusted occupancy rate of 99% including 99% at AHA Affordable Communities and 99% for public housing assisted units at AHA-sponsored mixed-income communities. The adjusted occupancy rates for each AHA-owned public housing assisted community and the adjusted occupancy rates for public housing assisted units at each of the mixed-income communities sponsored by AHA are set forth in Table C-1.

> NOTE: The adjusted occupancy rate takes into account the following types of units that are not included for purposes of the calculation: essential employee units, approved units kept out of occupancy for use by service providers or resident associations, units assigned to police officers, vacant units in communities that have been approved for demolition or disposition, fire damaged units which are the subject of insurance settlements, units that are part of an approved modernization project or units that are vacant due to litigation.

Issues and Proposed Actions. As set forth in the 2007 CATALYST Implementation Plan, AHA is committed to repositioning its conventional public housing assisted communities many of which are obsolete, not financially viable, not market competitive, and only serve to concentrate poverty. Due to these conditions, attracting and keeping working households is an extreme challenge. Under our Quality of Life Initiative (QLI), AHA plans on relocating families from 10 of its remaining public housing assisted family communities. These communities suffer from high crime rates, marginal employment, failing schools, and neighborhood disinvestment mostly due to the high concentration of impoverished families in the area. AHA plans to demolish these properties as quickly as possible. If demolishing these properties is delayed, then AHA anticipates that it will become more and more difficult to meet the occupancy benchmark.

Target Average Adjusted Occupancy: AHA's benchmark occupancy rate for FY 2008 continues to be 98%. AHA anticipates that the occupancy rates reported for FY 2008 will continue to be impacted by the enforcement of AHA's policies and standards and AHA's revitalization and QLI activity. Many communities have had great difficulty maintaining a 98% occupancy rate during FY 2007. In general, the family communities have had a much more difficult struggle making the benchmark due to the conditions discussed in the paragraph above. Fourteen of the 17 high-rises have maintained an occupancy rate over 99%. The occupancy rate at the John O. Chiles High-rise was dropping at the end of FY 2006 because of relocation activity in preparation for the revitalization of the property. The larger family properties have the most difficulty meeting the occupancy rate. As AHA implements its work/program participation requirement, FY 2008's occupancy rates will continue to suffer at these properties due to the ongoing evictions. PMCOs are having difficulty finding qualified applicants who are working, do not have bad debt issues or criminal backgrounds, and are still willing to live in obsolete family properties that do not have showers or central air conditioning. The property issues are further complicated due to budget constraints. The limited budgets make it very difficult for the PMCOs to keep up with the increase in the number of unit turns and completely restrict the possibility of making the improvements necessary to attract a large number of working families. As AHA moves forward with the revitalization activities and QLI and the demolition applications are approved for each property, AHA should be able to successfully achieve the overall benchmark of 98% for occupancy in FY 2008.

Mixed-Income Communities: In each of the following tables, the Mixed-Income section reflects the portfolio as of June 30, 2006.

**C-1 Public Housing Assisted Communities - Occupancy Rate Levels as of 6/30/06**

| Program/Community Type | Target | Percentage of Occupancy Level | Difference |
|---|---|---|---|
| **High-Rise** | | | |
| Antoine Graves | 98% | 100.0% | 2.0% |
| Barge Road | 98% | 100.0% | 2.0% |
| Cheshire Bridge | 98% | 99.4% | 1.4% |
| Cosby Spear Towers | 98% | 100.0% | 2.0% |
| East Lake Towers | 98% | 100.0% | 2.0% |
| Georgia Avenue | 98% | 98.7% | 0.7% |
| Graves Annex | 98% | 100.0% | 2.0% |
| Hightower Manor | 98% | 100.0% | 2.0% |
| John O. Chiles | 98% | 93.6% | -4.4% |
| Juniper & 10th | 98% | 99.3% | 1.3% |
| M.L. King Tower | 98% | 100.0% | 2.0% |
| Marian Road | 98% | 99.6% | 1.6% |
| Marietta Road | 98% | 98.4% | 0.4% |
| Palmer House | 98% | 99.6% | 1.6% |
| Peachtree Road | 98% | 99.5% | 1.5% |
| Piedmont Road | 98% | 99.0% | 1.0% |
| Roosevelt House | 98% | 99.6% | 1.6% |
| **High-Rise Totals** | **98%** | **99.2%** | **1.22%** |
| | | | |
| **Family** | | | |
| Bankhead Courts | 98% | 93.0% | -5.0% |
| Bowen Apartments | 98% | 98.3% | 0.3% |
| Englewood Manor | 98% | 98.4% | 0.4% |
| Herndon Homes | 98% | 100.0% | 2.0% |
| Hollywood Courts | 98% | 95.5% | -2.5% |
| Jonesboro North | 98% | 98.0% | 0.0% |
| Jonesboro South | 98% | 98.0% | 0.0% |
| Leila Valley | 98% | 98.4% | 0.4% |
| Martin Street Plaza | 98% | 98.3% | 0.3% |
| McDaniel Glenn | 98% | 100.0% | 2.0% |
| Thomasville Heights | 98% | 97.1% | -0.9% |
| University Apartments | 98% | 93.2% | -4.8% |
| U-Rescue Villa | 98% | 100.0% | 2.0% |
| Westminster | 98% | 100.0% | 2.0% |
| **Family Totals** | **98%** | **97.7%** | **-0.3%** |
| | | | |
| **Mixed-Income** | | | |
| Ashley CollegeTown | 98% | 98.7% | 0.7% |
| Ashley Courts at Cascade | 98% | 98.3% | 0.3% |
| Ashley Terrace at West End | 98% | 97.1% | -0.9% |
| Centennial Place | 98% | 98.7% | 0.7% |
| Columbia Commons | 98% | 100.0% | 2.0% |
| Columbia Village | 98% | 100.0% | 2.0% |
| Magnolia Park | 98% | 98.8% | 0.8% |
| Summerdale Commons | 98% | 96.0% | -2.1% |
| The Village at Castleberry Hill | 98% | 98.9% | 0.9% |
| The Villages at Carver | 98% | 98.4% | 0.4% |
| The Villages of East Lake | 98% | 100.0% | 2.0% |
| West Highlands at Columbia Park Citi | 98% | 98.4% | 0.4% |
| West Highlands at Columbia Estates | 98% | 100.0% | 2.0% |
| **Mixed-Income Totals** | **98%** | **98.7%** | **0.7%** |
| **PHA Total** | **98%** | **98.6% *** | **0.6%** |

**Rent Collections**

Average Percentage of Uncollected Rents: AHA's average percentage of uncollected rents was 1% as of June 30, 2006. The percentages of uncollected rents for each AHA-owned community and for the public housing assisted units at each mixed-income community sponsored by AHA are set forth in Table C-2.

Issues and Proposed Actions. As AHA implements its work/program participation requirement, FY 2008's uncollected rents will continue to suffer at the family properties. There has been a significant increase in the number of households compliant with the work/program participation requirement at AHA's Affordable Communities (as of 6/30/06, 73.4% of the households were compliant); however, AHA anticipates that during the remainder of FY 2007 and in FY 2008, evictions will remain high as AHA addresses noncompliant households. During FY 2007, the percent of uncollected rents has spiked to well over the 2% benchmark at several family properties for many months. While AHA is dedicated to working with the resident households and helping them to become compliant with the work/program participation requirement, it is very likely that AHA will have to continue a significant amount of evictions. However, the final push should be completed early in FY 2008 enabling AHA to achieve the 2% benchmark for uncollected rents for FY 2008.

Target Projection for Percentage of Uncollected Rents: AHA anticipates that even with the increase in uncollected rents at the family properties, the average percentage of uncollected rents will be under the 2% benchmark for June 30, 2008. As discussed above, the family communities will continue to struggle to meet the 2% MTW Benchmark for uncollected rents, but the high-rise communities do not have the same issues. For the FY 2008 end of the year benchmark, AHA expects to have no issues achieving the 2% benchmark.

**C-2 Public Housing Assisted - Communities Rent Collection Levels as of 6/30/06**

| Program/Community Type | Target | Percentage of Rent Uncollected | Difference |
|---|---|---|---|
| **High-Rise** | | | |
| Antoine Graves | 2% | 0% | -2.0% |
| Barge Road | 2% | 0% | -1.9% |
| Cheshire Bridge | 2% | 0% | -1.9% |
| Cosby Spear Towers | 2% | 1% | -0.7% |
| East Lake Towers | 2% | 0% | -1.6% |
| Georgia Avenue | 2% | 0% | -1.9% |
| Graves Annex | 2% | 0% | -2.0% |
| Hightower Manor | 2% | 0% | -2.0% |
| John O. Chiles | 2% | 0% | -1.6% |
| Juniper & 10th | 2% | 1% | -0.8% |
| M.L. King Tower | 2% | 0% | -1.6% |
| Marian Road | 2% | 0% | -2.0% |
| Marietta Road | 2% | 0% | -2.0% |
| Palmer House | 2% | 0% | -2.3% |
| Peachtree Road | 2% | 0% | -2.0% |
| Piedmont Road | 2% | 0% | -2.0% |
| Roosevelt House | 2% | 0% | -1.8% |
| **High-Rise Totals** | **2%** | **0%** | **-1.8%** |
| **Family** | | | |
| Bankhead Courts | 2% | 3% | 1.2% |
| Bowen Apartments | 2% | 4% | 1.5% |
| Englewood Manor | 2% | 2% | 0.0% |
| Herndon Homes | 2% | 2% | -0.4% |
| Hollywood Courts | 2% | 3% | 0.7% |
| Jonesboro North | 2% | 2% | 0.1% |
| Jonesboro South | 2% | 4% | 1.7% |
| Leila Valley | 2% | 3% | 1.2% |
| Martin Street Plaza | 2% | 0% | -1.8% |
| McDaniel Glenn | 2% | 0% | -2.0% |
| Thomasville Heights | 2% | 2% | 0.2% |
| University Apartments | 2% | 2% | -0.2% |
| U-Rescue Villa | 2% | 4% | 1.5% |
| Westminster | 2% | 1% | -1.3% |
| **Family Totals** | **2%** | **2%** | **0.2%** |
| **Mixed-Income** | | | |
| Ashley CollegeTown | 2% | 0% | -1.7% |
| Ashley Courts at Cascade | 2% | 1% | -1.3% |
| Ashley Terrace at West End | 2% | 0% | -2.0% |
| Centennial Place | 2% | 4% | 1.8% |
| Columbia Commons | 2% | 1% | -0.8% |
| Columbia Village | 2% | 0% | -2.0% |
| Magnolia Park | 2% | 1% | -1.1% |
| Summerdale Commons | 2% | 4% | 2.3% |
| The Village at Castleberry Hill | 2% | 0% | -1.9% |
| The Villages at Carver | 2% | 1% | -0.9% |
| The Villages of East Lake | 2% | 1% | -0.9% |
| West Highlands at Columbia Park Citi | 2% | 1% | -1.3% |
| West Highlands at Columbia Estates | 2% | 2% | 0.0% |
| **Mixed-Income Totals** | **2%** | **1%** | **-0.8%** |
| **PHA Total** | **2%** | **1%** | **-0.9%** |

**Work Orders**

Percentage of Emergency Work Orders With a Response Time of Less than 24 Hours/ Average Response Time for Routine Work Orders within 30 days. As of June 30, 2006, 99% of all emergency work orders received were completed or abated in less than 24 hours. Table C-3 shows the percentage of emergency work orders responded to in less than 24 hours for each AHA-owned community and for the public housing assisted units at each mixed-income community sponsored by AHA. AHA, through its development partners and PMCOs, responded to routine non-emergency work orders at an average rate of 1.6 days, as of June 30, 2006. Table C-4 shows the average response time (in days) for routine non-emergency work orders for each community.

Issues and Proposed Actions: AHA, through its development partners and PMCOs, has remained responsive to emergency and non-emergency work order turnaround through close management of the property budgets and the hiring and retention of qualified property management site staff. AHA also recognizes that reduced capital improvements funding and limited operating budgets may impact the ability to address maintenance issues in a proactive manner, thus resulting in an increased number of work order requests. This potential increase may also affect AHA's response times as well.

Target Projection of Work Orders: AHA's MTW benchmark goal is to complete or abate emergency work orders in less than 24 hours of issuance 100% of the time. AHA intends to complete routine non-emergency work orders in less than 7 days. Though challenging, AHA and the PMCOs expect to meet the MTW benchmark for handling emergency work orders for FY 2007 and FY 2008. AHA has not had any issues with routine work orders. This benchmark may become more critical next year as budget constraints have severely limited the money available for non-routine maintenance. The plan to vacate and demolish the properties in the worse condition will significantly help in ensuring that AHA is able to meet this benchmark. Currently AHA believes that the benchmark can be maintained but any major issues will force the PMCOs to spend over the budget.

**C-3 Public Housing Assisted Communities - Emergency Work Order Responses as of 6/30/06**

| Program/Community Type | Target | Percentage of Emergency Work Orders Completed or Abated Within 24 Hours | Difference |
|---|---|---|---|
| **High-Rise** | | | |
| Antoine Graves | 100% | 100.0% | 0.0% |
| Barge Road | 100% | 100.0% | 0.0% |
| Cheshire Bridge | 100% | 100.0% | 0.0% |
| Cosby Spear Towers | 100% | 99.8% | -0.2% |
| East Lake Towers | 100% | 100.0% | 0.0% |
| Georgia Avenue | 100% | 100.0% | 0.0% |
| Graves Annex | 100% | 100.0% | 0.0% |
| Hightower Manor | 100% | 100.0% | 0.0% |
| John O. Chiles | 100% | 100.0% | 0.0% |
| Juniper & 10th | 100% | 100.0% | 0.0% |
| M.L. King Tower | 100% | 100.0% | 0.0% |
| Marian Road | 100% | 100.0% | 0.0% |
| Marietta Road | 100% | 100.0% | 0.0% |
| Palmer House | 100% | 100.0% | 0.0% |
| Peachtree Road | 100% | 100.0% | 0.0% |
| Piedmont Road | 100% | 100.0% | 0.0% |
| Roosevelt House | 100% | 100.0% | 0.0% |
| **High-Rise Totals** | **100%** | **100.0%** | **0.0%** |
| | | | |
| **Family** | | | |
| Bankhead Courts | 100% | 99.7% | -0.3% |
| Bowen Apartments | 100% | 99.9% | -0.1% |
| Englewood Manor | 100% | 100.0% | 0.0% |
| Herndon Homes | 100% | 100.0% | 0.0% |
| Hollywood Courts | 100% | 100.0% | 0.0% |
| Jonesboro North | 100% | 99.7% | -0.3% |
| Jonesboro South | 100% | 100.0% | 0.0% |
| Leila Valley | 100% | 99.8% | 0.3% |
| Martin Street Plaza | 100% | 100.0% | 0.0% |
| McDaniel Glenn | 100% | 100.0% | 0.0% |
| Thomasville Heights | 100% | 100.0% | 0.0% |
| University Apartments | 100% | 100.0% | 0.0% |
| U-Rescue Villa | 100% | 100.0% | 0.0% |
| Westminster | 100% | 100.0% | 0.0% |
| **Family Totals** | **100%** | **99.9%** | **-0.06%** |
| | | | |
| **Mixed-Income** | | | |
| Ashley CollegeTown | 100% | 100.0% | 0.0% |
| Ashley Courts at Cascade | 100% | 100.0% | 0.0% |
| Ashley Terrace at West End | 100% | 100.0% | 0.0% |
| Centennial Place | 100% | 100.0% | 0.0% |
| Columbia Commons | 100% | 100.0% | 0.0% |
| Columbia Village | 100% | 100.0% | 0.0% |
| Magnolia Park | 100% | 100.0% | 0.0% |
| Summerdale Commons | 100% | 82.0% | -18.0% |
| The Village at Castleberry Hill | 100% | 94.0% | -6.0% |
| The Villages at Carver | 100% | 100.0% | 0.0% |
| The Villages of East Lake | 100% | 100.0% | 0.0% |
| West Highlands at Columbia Park Citi | 100% | 100.0% | 0.0% |
| West Highlands at Columbia Estates | 100% | 100.0% | 0.0% |
| **Mixed-Income Totals** | **100%** | **98.2%** | **-1.8%** |
| **PHA Total** | **100%** | **99.4%*** | **-0.6%** |

**C-4 Public Housing Assisted Communities - Routine Work Order Responses as of 6/30/06**

| Program/Community Type | Target | Average # of Days to Complete Routine Work Orders | Difference |
|---|---|---|---|
| **High-Rise** | | | |
| Antoine Graves | 7 | 1.0 | -6.0 |
| Barge Road | 7 | 1.0 | -6.0 |
| Cheshire Bridge | 7 | 1.0 | -6.0 |
| Cosby Spear Towers | 7 | 1.4 | -5.6 |
| East Lake Towers | 7 | 1.1 | -5.9 |
| Georgia Avenue | 7 | 1.5 | -5.5 |
| Graves Annex | 7 | 1.0 | -6.0 |
| Hightower Manor | 7 | 1.6 | -5.4 |
| John O. Chiles | 7 | 1.0 | -6.0 |
| Juniper & 10th | 7 | 1.1 | -5.9 |
| M.L. King Tower | 7 | 1.1 | -5.9 |
| Marian Road | 7 | 1.1 | -5.9 |
| Marietta Road | 7 | 1.0 | -6.0 |
| Palmer House | 7 | 1.0 | -6.0 |
| Peachtree Road | 7 | 1.0 | -6.0 |
| Piedmont Road | 7 | 1.0 | -6.0 |
| Roosevelt House | 7 | 1.0 | -6.0 |
| **High-Rise Totals** | **7** | **1.1** | **-5.9** |
| | | | |
| **Family** | | | |
| Bankhead Courts | 7 | 2.2 | -4.8 |
| Bowen Apartments | 7 | 2.1 | -4.9 |
| Englewood Manor | 7 | 1.0 | -6.0 |
| Herndon Homes | 7 | 2.2 | -4.8 |
| Hollywood Courts | 7 | 3.9 | -3.1 |
| Jonesboro North | 7 | 3.4 | -3.6 |
| Jonesboro South | 7 | 3.1 | -3.9 |
| Leila Valley | 7 | 2.4 | -4.6 |
| Martin Street Plaza | 7 | 1.4 | -5.6 |
| McDaniel Glenn | 7 | 0.3 | -6.7 |
| Thomasville Heights | 7 | 1.4 | -5.6 |
| University Apartments | 7 | 2.0 | -5.0 |
| U-Rescue Villa | 7 | 1.4 | -5.6 |
| Westminster | 7 | 1.0 | -6.0 |
| **Family Totals** | **7** | **2.0** | **-5.0** |
| | | | |
| **Mixed-Income** | | | |
| Ashley CollegeTown | 7 | 1.0 | -6.0 |
| Ashley Courts at Cascade | 7 | 0.0 | -7.0 |
| Ashley Terrace at West End | 7 | 1.0 | -6.0 |
| Centennial Place | 7 | 2.0 | -5.0 |
| Columbia Commons | 7 | 1.2 | -5.8 |
| Columbia Village | 7 | 1.2 | -5.8 |
| Magnolia Park | 7 | 1.9 | -5.1 |
| Summerdale Commons | 7 | 5.1 | -1.9 |
| The Village at Castleberry Hill | 7 | 2.0 | -5.1 |
| The Villages at Carver | 7 | 2.6 | -4.4 |
| The Villages of East Lake | 7 | 3.3 | -3.7 |
| West Highlands at Columbia Park Citi | 7 | 1.2 | -5.8 |
| West Highlands at Columbia Estates | 7 | 1.2 | -5.8 |
| **Mixed-Income Totals** | **7** | **1.8** | **-5.2** |
| **PHA Total** | **7** | **1.6** | **-5.4** |

## Inspections

Inspection Strategy: Each AHA Affordable Community and the Owner Entity Interest of the mixed-income communities, respectively, through their respective property management agents, are required to inspect 10% of the public housing assisted units at each property. At year end, each site's agent 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 AHA-owned public housing assisted communities on an annual basis. For the mixed-income communities, AHA relies on quality control inspections performed by the Georgia Department of Community Affairs (DCA) as part of their tax credit compliance oversight because in all cases, the public housing assisted units also count as tax credit units. Outcomes from the DCA inspections reports are reviewed by AHA's Management and Occupancy Compliance Department during their routine review process. This is consistent with the approach set forth by AHA in the Tax Credit Compliance Model approved by HUD. Additionally, in January 2005, AHA implemented an enhanced Uniform Physical Conditions Standards (UPCS) inspections standard which AHA will continue to use during FY 2008. Table C-5 shows the percentage of units and common areas inspected as of June 30, 2006.

Issues and Proposed Actions: AHA has not had any issues with inspections over FY 2007 and does not foresee any issues for FY 2008.

Target Projections for Planned Inspections: AHA anticipates completing 100% of its planned inspections by the end of each fiscal year.

During FY 2007, AHA will continue to refine and improve the quality assurance (QA) inspections process for AHA-owned Affordable Communities. Through its integrated inspections system, AHA's QA staff periodically visit communities during the course of each calendar year to conduct the following types of inspections:

1. **Enhanced Uniform Physical Conditions Standards (UPCS) and REAC inspection.** This year, in addition to completing the UPCS inspections, AHA properties were evaluated through REAC inspections. The results of the UPCS inspections and REAC inspections continue to emphasize the obsolescence and difficult conditions of the family properties. Most of the family properties have endured beyond their useful life and AHA simply does not have the budget available to make all the improvements necessary to ensure that these properties pass the UPCS and REAC inspections. While overall, 75% of AHA-owned Affordable Communities passed the REAC inspections, 58% of the family properties failed the inspection and six of those properties scored below a 50. Both the REAC and UPCS inspections confirm that AHA's strategy to relocate the residents and demolish the majority of the family properties is the right thing to do for the residents and for AHA.

2. **Major System Inspections.** In conjunction with UPCS inspections, AHA continues to conduct QA inspections of the major equipment systems at the AHA-owned family and high-rise communities. These inspections focus on confirming that routine preventative maintenance is being performed and enables AHA to monitor the status of the systems to prioritize the replacement schedule.

3. **Asset Risk Control Inspections**. This inspections process focuses on a proactive site review of potential high risk areas. A team consisting of property operations staff, the AHA risk manager and an AHA real estate management representative walk each community annually utilizing a checklist developed jointly between AHA and its insurance carrier. A reporting of findings is prepared and any noted deficiencies are promptly repaired.

4. **Elevator Inspections**. Because of the special needs of elderly and disabled persons residing at AHA high-rise communities, it is essential that elevators are functioning and are in good condition on a consistent basis. AHA utilizes a specialty elevator consultant that inspects all elevators annually to ensure proper preventive maintenance is being performed and to ensure that equipment is in appropriate operating condition. Deficiencies are noted and then forwarded to the PMCOs for follow-up and prompt correction. Once all the work is reported as complete, the consultant conducts a confirmatory inspection. Elevators that are discovered to be beyond their life cycle are then targeted for modernization as soon as practical given funding constraints.

5. **Security Compliance Assessment.** During FY 2007, AHA implemented a new inspections process that focused on the condition of community safety features including signs of community decay, site lighting, operational condition of access control and video call down systems, and quality of security patrols. As with AHA's other inspections, a report of findings is prepared and forwarded to its management agents for follow-up and correction of any deficiencies.

**C-5 Public Housing Assisted Communities - Unit and Common Area Inspection Levels as of 6/30/06**

| Program/Community Type | Target | Percentage of Units and Common Areas Inspected | Difference |
|---|---|---|---|
| **High-Rise** | | | |
| Antoine Graves | 100% | 100.0% | 0.0% |
| Barge Road | 100% | 100.0% | 0.0% |
| Cheshire Bridge | 100% | 100.0% | 0.0% |
| Cosby Spear Towers | 100% | 100.0% | 0.0% |
| East Lake Towers | 100% | 100.0% | 0.0% |
| Georgia Avenue | 100% | 100.0% | 0.0% |
| Graves Annex | 100% | 100.0% | 0.0% |
| Hightower Manor | 100% | 100.0% | 0.0% |
| John O. Chiles | 100% | 100.0% | 0.0% |
| Juniper & 10th | 100% | 100.0% | 0.0% |
| M.L. King Tower | 100% | 100.0% | 0.0% |
| Marian Road | 100% | 100.0% | 0.0% |
| Marietta Road | 100% | 100.0% | 0.0% |
| Palmer House | 100% | 100.0% | 0.0% |
| Peachtree Road | 100% | 100.0% | 0.0% |
| Piedmont Road | 100% | 100.0% | 0.0% |
| Roosevelt House | 100% | 100.0% | 0.0% |
| **High-Rise Totals** | **100%** | **100.0%** | **0.0%** |
| **Family** | | | |
| Bankhead Courts | 100% | 100.0% | 0.0% |
| Bowen Apartments | 100% | 100.0% | 0.0% |
| Englewood Manor | 100% | 100.0% | 0.0% |
| Herndon Homes | 100% | 100.0% | 0.0% |
| Hollywood Courts | 100% | 100.0% | 0.0% |
| Jonesboro North | 100% | 100.0% | 0.0% |
| Jonesboro South | 100% | 100.0% | 0.0% |
| Leila Valley | 100% | 100.0% | 0.0% |
| Martin Street Plaza | 100% | 100.0% | 0.0% |
| McDaniel Glenn | 100% | 100.0% | 0.0% |
| Thomasville Heights | 100% | 100.0% | 0.0% |
| University Apartments | 100% | 100.0% | 0.0% |
| U-Rescue Villa | 100% | 100.0% | 0.0% |
| Westminster | 100% | 100.0% | 0.0% |
| **Family Totals** | **100%** | **100.0%** | **0.0%** |
| **Mixed-Income** | | | |
| Ashley CollegeTown | 100% | 100.0% | 0.0% |
| Ashley Courts at Cascade | 100% | 100.0% | 0.0% |
| Ashley Terrace at West End | 100% | 97.1% | -2.9% |
| Centennial Place | 100% | 100.0% | 0.0% |
| Columbia Commons | 100% | 100.0% | 0.0% |
| Columbia Village | 100% | 100.0% | 0.0% |
| Magnolia Park | 100% | 100.0% | 0.0% |
| Summerdale Commons | 100% | 96.0% | -4.1% |
| The Village at Castleberry Hill | 100% | 98.9% | -1.1% |
| The Villages at Carver | 100% | 99.6% | -0.4% |
| The Villages of East Lake | 100% | 100.0% | 0.0% |
| West Highlands at Columbia Park Citi | 100% | 100.0% | 0.0% |
| West Highlands at Columbia Estates | 100% | 100.0% | 0.0% |
| **Mixed-Income Totals** | **100%** | **99.3%** | **-0.7%** |
| **PHA Total** | **100%** | **99.8%** | **-0.2%** |

**Security**

AHA will continue to address crime and safety in the communities through collaborative strategies with its private development partners, PMCOs, local law enforcement, and residents. In addition to the specific technology projects described in Part VII of this plan, AHA will (1) build on its relationship with the Atlanta Police Department to identify other methods to reduce crime and enhance safety and security at AHA-owned properties and AHA-sponsored mixed-income communities, (2) continue enhanced criminal screening standards and processes and stricter lease enforcement, (3) pursue funding opportunities to provide additional security staff at AHA-owned properties, and (4) complete the necessary preventive maintenance and repairs to ensure security equipment remains operational.

## Appendix D: Mixed-Income Communities (as of June 30, 2006)*

Ashley Courts at Cascade
Ashley Terrace at West End
Centennial Place
College Town at West End
Columbia Commons
Columbia Village
Magnolia Park
Summerdale Commons
The Village at Castleberry Hill
The Villages at Carver
The Villages of East Lake
West Highlands at Heman E. Perry Boulevard

*Mixed-income communities under development where the first phase has reached stabilization.

# Atlanta Housing Authority FY 2008 Corporate Roadmap

**Framing Documents**

- Moving to Work Agreement (including MTW Benchmarks)
- AHA Business Plan (FY05 Base Plan)
- CATALYST Implementation Plans (FY06 & FY07)
- Statement of Corporate Policies
- Housing Choice Administrative Plan

## Mission

To provide quality affordable housing for the betterment of the community.

## Vision

Healthy mixed-income communities

## Guiding Principles

1. End the practice of concentrating the poor in distressed, isolated neighborhoods.

2. Create healthy communities using a holistic and comprehensive approach to assure long-term marketability and sustainability of the community and to support excellent outcomes for families especially the children – emphasis on excellent, high performing neighborhood schools and excellent quality of life amenities, such as first class retail and green space.

3. Create mixed-income communities with the goal of creating a market rate community with a seamless affordable component.

4. Develop communities through public/private partnerships using public and private sources of funding and market principles.

5. Residents should be supported with adequate resources to assist them to achieve their life goals, focusing on self-sufficiency and educational advancement of the children. Expectations and standards for personal responsibility should be benchmarked for success.

## Goals

**Completed 1/12/05**

**Economic Viability**

"Maximize AHA's economic viability and sustainability."

**Quality Living Environments**

"Provide quality affordable housing opportunities in mixed income communities with access to excellent quality of life services."

**Self-Sufficiency**

"Facilitate opportunities for families and individuals to become self-sufficient and financially independent to transition from dependency on housing subsidy."

## Corporate Objectives

**Finalized 02/23/06**

**Economic Viability**

- Increase Total Revenue
- Improve ROI
- Increase Net Income

**Quality Living Environments**

- Increase Total Percentage of Subsidized Units in Low Poverty Areas
- Eliminate D&F Properties
- Increase Mixed-Income Units
- Increase Affordable Housing Properties Repositioned
- Increase Project-Based Vouchers
- Increase Number of Single Family Homes Constructed (HOPE VI Communities with Housing Component)

**Self-Sufficiency**

- Increase Workforce Participation (MTW Benchmark)
- Increase Percentage of Target Households that are Work Compliant Aligned with Escalating Annual Benchmarks
- Increase Average Income Per Household
- Increase Percentage of Average Tenant Rent
- Increase Numbers of Household Homeowners (MTW Benchmarks)
- Increase Number of Assisted Household Transitioning Off the Subsidy Programs

**"ARCI" Ownership Definitions**:

**A = Accountable** – "The Buck Stops Here". One person who has been authorized to get the assignment done
**R = Responsible.** "Executers of the Project". Can be more than one person
**C = Consult** – Provides thoughts or some buy-in. Multiple persons OK
**I = Inform** – Who you need to tell. Multiple persons OK.

## Strategies

**Finalized 2/8/05**

**Economic Viability**

| Strategy | Owner |
|---|---|
| Develop financial models to support agency viability | Nolan |
| Implement HUD and non-HUD revenue maximization strategies | Nolan |
| Decrease expenses for overhead, administration and other costs | Nolan |
| Implement systems and procedures to optimize value added for dollar invested | Nolan |

**Quality Living Environments**

| Strategy | Owner |
|---|---|
| Create real estate repositioning "machine" | Fitzgerald |
| Create high quality relocation system | Herrera |
| Implement enhanced Real Estate Quality Assurance Process | Jones |

**Self-Sufficiency**

| Strategy | Owner |
|---|---|
| Develop and nurture a comprehensive network/pool of quality residential and employment service providers | Simms |
| Create a business system to connect families to mainstream services (homeownership and mainstream resources) | Simms |
| Implement programs to enhance compliance | Simms |

**Foundational**

| Strategy | Owner |
|---|---|
| Develop Communications Strategy (external/internal) | Glover |
| Create infrastructure for data & reporting system | Farsi |
| Ensure compliance with the regulatory agreements | Proctor |
| Close skill gap by identifying and addressing critical areas of need | Senior Management Team |
| Implement culture change strategies to improve accountability, collaboration and effectiveness | Farsi |

## FY 2008
## Six Major Priorities & Supporting Activities

### Economic Viability

**Asset Management**

- Fee-Based Contract Administration
- Innovative Subsidy Strategies
- Mark to Market Program
- Oversight of Turnkey III Assets
- Private Sector Innovation
- Streamlining Property-Level Operations
- Sustaining Mixed-Income Investments

**Re-Engineering Housing Choice Operations**

- $125 Minimum Rent
- AHA Standards and Incoming/Outbound Ports
- Annual Re-certification Re-engineering
- Automated Hearing Database
- Automated Outbound Portability Billing
- Automated Rent Reasonableness System
- Customer Service Call Center
- Developing Reoccupancy Process
- Elderly Income Disregard
- Enhanced Business Systems
- Enhanced Real Estate Inspection Systems
- Enhanced Relocation Process and Database
- File Purges and E-Copy
- Homeownership Standards
- Housing Choice Fair Market Rent Standards
- Housing Choice Fixed Subsidy Initiative
- Intake/Waitlist Re-engineering
- Place-based and People-Based Deconcentration Strategy
- Program Moves
- Program Performance Indicators
- Re-engineering Property Owner/Vendor Process
- Relocation Policies
- Standards for Residency in Single Family Homes
- UHAP Bankcards

### Quality Living Environments

**Revitalization Program**

- Comprehensive Homeownership Program

**Project Based Rental Assistance as a Development Tool**

- Affordable Assisted Living Demonstration
- Developing Alternative and Supportive Housing Resources
- Project Based Rental Assistance Homeless Demonstration Program
- Project Based Rental Assistance Mental Health Demonstration
- Project Based Rental Assistance Regional Expansion Program
- Project Based Rental Assistance Site Based Administration

**Quality of Life Initiative**

- Customer and Community Relations
- Good Neighbor Program II
- Human Development and Support Services
- Responsible Relocation

### Self-Sufficiency

**Human Development**

- Atlanta Community Scholars Awards
- CATALYST Resource Guide
- Connections to Service Provider Network
- Customer and Community Relations
- Good Neighbor Program II
- Housing Choice Family Self-Sufficiency Program Re-engineering
- Human Development and Support Services
- Place Based Supportive Services Strategy Plot
- Service Provider Network
- Work/Program Participation Requirement

### Ongoing Business Operations

- Asset Management under the New Operating Subsidy Rule
- Comcast Cable Partnership
- Energy Performance Contracting
- Enhanced Real Estate Inspection Systems
- Fee-for-Service Methodology
- Financial Operations/Single Fund/MTW Block Grant Management
- Procurement Enhancements
- Project Based Accounting and Financial Systems
- Utility Allowance Waiver
- $125 Minimum Rent
- 4 to 1 elderly Admissions Policy
- Affordable Fixed Rent Demonstration
- Corporate Policies Governing Eligibility, Occupancy, and Program Administration
- Elderly Income Disregard
- Enhanced Accessibility Initiative
- Enhanced Business Systems
- Measuring Success – Moving to Work
- Organizational Initiatives
- Permanent Designated Housing
- Video call Down Systems

## Appendix F: Implementation of AHA's CATALYST Plan

The following graphic, *Implementation of Atlanta Housing Authority's (AHA) CATALYST Plan (FY 2005 – FY 2008)*, provides a pictorial overview of the evolution of AHA's Business Plan and subsequent annual plans. As reflected in the graphic, AHA's plan has evolved over the past four fiscal years including the refinement of its business lines.

The CATALYST Activities Directory provides a comprehensive listing of activities that AHA is implementing or plans to implement under its Business Plan during the term of its Moving to Work (MTW) Agreement and beyond. The directory lists the names of the activities categorizing them by the six major priorities that AHA will be implementing in FY 2008. Where indicated, the directory also includes former names of activities that may have been used in previous annual plans, the prioritization of activities for FY 2008, implementation status, and a schedule that indicates which of AHA's annual plans contain information on each activity. As AHA's annual plans have evolved over time, the business lines have been revised. Therefore, it is important to note that in using this directory to locate projects in the annual plans by business line, some projects may be located to other areas.

# Implementation of Atlanta Housing Authority's (AHA) CATALYST Plan (FY 2005 – FY 2008)

## BUSINESS PLAN PROJECTS

| AHA GOALS | FY 2005 Business Plan for MTW Agreement Period | FY 2006 Implementation Plan | FY 2007 Implementation Plan | FY 2008 Implementation Plan |
|---|---|---|---|---|
| Quality Living Environments | (Please See CATALYST Projects Directory) | (Please See CATALYST Projects Directory) | (Please See CATALYST Projects Directory) | (Please See CATALYST Projects Directory) |
| Self-Sufficiency | (Please See CATALYST Projects Directory) | (Please See CATALYST Projects Directory) | (Please See CATALYST Projects Directory) | (Please See CATALYST Projects Directory) |
| Economic Viability | (Please See CATALYST Projects Directory) | (Please See CATALYST Projects Directory) | (Please See CATALYST Projects Directory) | (Please See CATALYST Projects Directory) |

## FISCAL YEAR IMPLEMENTATION FOCUS

**The CATALYST Initiatives**

1) Building Strong Communities
2) Quality Affordable Housing for Seniors & Persons with Disabilities
3) Creating Communities of Opportunity
4) Raising Standards and Expectations

**AHA's Four Business Lines and Corporate Support**

1) Asset and Property Management
2) Housing Choice Administration
3) Real Estate Development & Acquisitions
4) Fee Based Contract Administration

Corporate Support

**AHA's Four Business Lines (Revised) and Corporate Support**

1) Real Estate Management
2) Housing Choice Administration
3) Real Estate Development & Acquisitions
4) Asset Management

Corporate Support

**AHA's Six Major Priorities for FY 2008 and Ongoing Business Operations**

1) Revitalization Program
2) Quality of Life Initiative
3) Project Based Rental Assistance as a Development Tool
4) Re-engineering Housing Choice Operations
5) Asset Management
6) Human Development

Ongoing Business Operations

| Supporting Activity Name | Former Activity Name(s), If Applicable | FY 2008 Activity Description | FY 2008 Prioritization | Status as of 1/31/07 | FY 2005 | FY 2006 | FY 2007 | FY 2008 | Business Line |
|---|---|---|---|---|---|---|---|---|---|
| **Revitalization Program** | | | | | | | | | |
| Revitalization Program | Repositioning | AHA will continue its strategic revitalization program. Currently there are six major revitalization projects underway in various stages of development. AHA and our various private sector development partners are engaged in "community building" projects with the goal of creating healthy and economically sustainable mixed-use, mixed-income communities. | **Priority** | **I** | √ | √ | √ | √ | **Real Estate Development & Acquisitions** |
| Comprehensive Homeownership Program | Core Activity: Homeownership Program | AHA will continue the implementation of homeownership programs that develop affordable homeownership opportunities in healthy, mixed-income communities and prepare low-income families to become successful homeowners. | **Priority** | **I** | √ | √ | √ | √ | **Real Estate Development & Acquisitions** |
| **Quality of Life Initiative** | | | | | | | | | |
| Quality of Life Initiative | | The Quality of Life Initiative (QLI) will allow families in AHA's remaining conventional public housing communities the opportunity to relocate from environments of concentrated poverty. This strategy is consistent with AHA's vision of providing eligible families with access to affordable housing while deconcentrating poverty and building healthy communities. | **Priority** | **P** | | | | √ | **Housing Choice Administration** |
| Responsible Relocation | Enhanced Relocation Process<br><br>Enhanced Relocation Process and Database Enhancement | Responsible relocation will ensure choice, support and successful outcomes for each family. The Relocation Team will provide the families with the tools to make informed choices about the best housing opportunities for their family. | **Priority** | **I** | | √ | √ | √ | **Housing Choice Administration** |
| Good Neighbor Program II | Good Neighbor Program | AHA's Good Neighbor Program (GNP) is designed to coach and prepare AHA-assisted families to live and blend into the communities where they live and help them to understand and value their roles and responsibilities as good neighbors. The training will continue to be provided by Georgia State University during FY 2008. | **Priority** | **I** | | √ | √ | √ | **Housing Choice Administration** |
| Human Development and Support Services | Human Services Management<br><br>Client Services | During FY 2008, AHA will expand the Human Development and Support Services to provide support to families being relocated as part of the Quality of Life Initiative (QLI). Human development and support services will be provided to affected families for a 27-month period and AHA will solicit additional organizations to serve as Human Services Providers. | **Priority** | **I** | √ | √ | √ | √ | **Real Estate Development & Acquisitions** |
| Customer and Community Relations | | AHA will continue the implementation of the customer and community relations phone line (1-888-AHA-4YOU) in order to effectively respond to citizen concerns and compliments regarding Housing Choice participants in their neighborhoods. | **Ongoing** | **I** | | | | √ | **Corporate Support** |

| Supporting Activity Name | Former Activity Name(s), If Applicable | FY 2008 Activity Description | FY 2008 Prioritization | Status as of 1/31/07 | FY 2005 | FY 2006 | FY 2007 | FY 2008 | Business Line |
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| **Project Based Rental Assistance as a Development Tool** | | | | | | | | | |
| Project Based Rental Assistance+E49 as a Development Tool | Partnering in Private Development Deals (Project-Based Procurement) | AHA will continue to use Project Based Rental Assistance to create additional affordable housing opportunities in healthy mixed-income communities for low-income families. | **Priority** | **I** | √ | √ | √ | √ | **Real Estate Development & Acquisitions** |
| Developing Alternative and Supportive Housing Resources | | During FY 2008, AHA will develop and implement three major initiatives toward developing alternative and supportive housing resources for income eligible families. These initiatives include: (1) Project Based Rental Assistance Homeless Demonstration Program; (2) Project Based Rental Assistance Mental Health Demonstration; and (3) Affordable Assisted Living Demonstration Program. | **Priority** | **I** | √ | √ | √ | √ | **Real Estate Development & Acquisitions** |
| Project Based Rental Assistance Regional Expansion Program | | In our continued effort to increase the quality and choice of the housing stock available to Housing Choice participants, AHA will negotiate Intergovernmental Agreements with various PHAs in the Atlanta metropolitan area subject to the provisions of State law to permit site-based administration of AHA's Project Based Rental Assistance Program in those jurisdictions. | **Priority** | **P** | | | | √ | **Housing Choice Administration** |
| Project Based Rental Assistance Homeless Demonstration Program | Developing Alternative and Supportive Housing | In support of the Mayor's Regional Homeless Commission master plan to eliminate homelessness in the city of Atlanta, AHA has established a Homeless Demonstration Program in collaboration with United Way of Metropolitan Atlanta, Inc. that utilizes Project-based Vouchers to provide rental assistance targeted to the chronically homeless population. During FY 2008, AHA will solicit proposals for project based assistance from housing providers who have partnered with United Way service providers or who will fund the requisite services. | **Priority** | **I** | | √ | √ | √ | **Housing Choice Administration** |
| Project Based Rental Assistance Mental Health Demonstration | Developing Alternative and Supportive Housing | AHA will work with the Georgia Department of Human Resources, Department of Mental Health and Department of Community Affairs to expand the supportive housing demonstration model to increase housing opportunities for persons with mental health disabilities. Proposals will be solicited from private developers and mental health service providers for existing, rehabilitations and/or new construction of housing with supportive services for persons with mental health disabilities. | **Priority** | **P** | | | | √ | **Housing Choice Administration** |

| Supporting Activity Name | Former Activity Name(s), If Applicable | FY 2008 Activity Description | FY 2008 Prioritization | Status as of 1/31/07 | FY 2005 | FY 2006 | FY 2007 | FY 2008 | Business Line |
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| Project Based Rental Assistance Site Based Administration | Voucher Administration Reform: On-Site Administration | In FY 2007, AHA implemented a site-based administration program for rental properties owned by public/private partnerships sponsored by AHA or other third party owners, for which AHA has provided Project Based Rental Assistance for a percentage of the units utilizing a web-based technology portal for interaction between AHA and the properties. During FY 2008, AHA will develop and implement an enhanced technology solution which will enable such owners to upload directly to the AHA system. | **Ongoing** | **I** | | √ | √ | √ | **Housing Choice Administration** |
| Affordable Assisted Living Demonstration | Development of Affordable Assisted Living<br><br>Developing Alternative and Supportive Housing Resources | During FY 2008, AHA will continue to explore strategies for developing affordable assisted living opportunities for low-income seniors and for disabled persons. These strategies will include but are not limited to exploring ways to leverage resources with Medicaid Waivers or other service funding through the Georgia Department of Human Resources and Georgia Department of Community Health and exploring ways to use Section 8 project-based rental assistance, Low Income Housing Tax Credits and other financial resources to create affordable assisted living models at AHA-sponsored mixed-income communities. | **Priority** | **P** | √ | | | | **Real Estate Management** |
| **Re-engineering Housing Choice Operations** | | | | | | | | | |
| Re-engineering Housing Choice Operations | | During FY 2008, AHA will continue the re-engineering of the Housing Choice Voucher Program. The re-engineering initiative is focused on redesign of systems and business processes utilizing state-of-the-art technology to move closer towards paperless administration of the Housing Choice Program. The re-engineering efforts also include the development and implementation of continuous quality improvement initiatives that will result in improved customer service and operational efficiencies and effectiveness. | **Ongoing** | **I** | √ | √ | √ | √ | **Housing Choice Administration** |
| Annual Re-certification Re-engineering | | AHA will complete the development of the automated re-certification module during FY 2008. Re-certification processes will continue to be streamlined. Households that are exempt from the work/program participation requirement (i.e. Elderly and Disabled) will be re-certified every two years effective July 1, 2007. Households fully compliant with the work/program participation requirement as of their FY 2008 annual re-certifications will also be re-certified every two years upon completion of their FY 2008 re-certifications. | **Priority** | **P** | | | √ | √ | **Housing Choice Administration** |

| Supporting Activity Name | Former Activity Name(s), If Applicable | FY 2008 Activity Description | FY 2008 Prioritization | Status as of 1/31/07 | FY 2005 | FY 2006 | FY 2007 | FY 2008 | Business Line |
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| Re-engineering Property Owner/Vendor Process | | AHA will re-engineer the process for approval and processing of property owners prior to execution of the Housing Assistance Payment (HAP) contract and eliminate paper checks and mailing of remittance forms to landlords by creating web-based access for each property owner | **Priority** | **P** | | | √ | √ | **Housing Choice Administration** |
| UHAP Bankcards | | In FY 2008, paper checks for payment of utility housing assistance payments will be eliminated and bankcards will be issued to eligible program participants. Cards will be loaded monthly with the amount of the UHAP payment and use will be restricted to Atlanta area utility providers only. | **Priority** | **P** | | | √ | √ | **Housing Choice Administration** |
| Automated Outbound Portability Billing | | AHA will work with the Housing Authority of Fulton County (HAFC) in FY 2008 to develop a demonstration to create an automated billing and payment process for all AHA vouchers ported to Fulton County. AHA and HACF will utilize the HUD PIC system to determine the amount of subsidy to be paid. A payment process directly through AHA's ORACLE MIS accounts payable module will be developed and implemented. | **Priority** | **P** | | | | √ | **Housing Choice Administration** |
| File Purges and E-Copy | | AHA will continue e-copying permanent files on an ongoing basis as a part of its routine operations. | **Ongoing** | **I** | | | √ | √ | **Housing Choice Administration** |
| Automated Rent Reasonableness System | | AHA will continue to utilize the automated rent reasonableness system established in FY 2007 as part of its routine operations. | **Ongoing** | **I** | | | √ | √ | **Housing Choice Administration** |
| Program Performance Indicators | | AHA will continue to develop and implement tracking systems for all key Housing Choice program performance indicators. During FY 2008, the automated voucher tracking system will be fully implemented to monitor all vouchers issued by type, average days to lease, voucher success rates for applicants, and program moves. Census tract data for all households will be captured to track impact of deconcentration strategies. | **Ongoing** | **I** | | | √ | √ | **Housing Choice Administration** |

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| Customer Service Call Center | | AHA will enhance the design of the customer service call center to deliver improved customer service and to respond more quickly to customer needs. AHA has institutionalized the call center into its routine operations and will continue to operate the call center during FY 2008 and beyond. | **Ongoing** | **I** | | | √ | √ | **Housing Choice Administration** |
| Relocation Policies | | During FY 2007, AHA developed corporate policies for discretionary actions under the Uniform Relocation Act (URA) to guide relocation staff in providing relocation assistance and processing relocation claims. AHA will continue the implementation of these policies during FY 2008. | **Ongoing** | **I** | | | √ | √ | **Housing Choice Administration** |
| Automated Hearing Database | | During FY 2007, AHA developed and implemented an automated system to track proposed terminations, hearing requests, hearing actions and final disposition of terminations in the voucher program. AHA has incorporated the use of this system in its routine operations and will continue to utilize the system during FY 2008. | **Ongoing** | **I** | | | √ | √ | **Housing Choice Administration** |
| Developing Reoccupancy Process | | AHA will refine and improve the process for the re-occupancy of newly developed mixed-income communities. Revised procedures for the re-occupancy of the revitalized communities will be completed and included in AHA's Relocation Implementation Procedures Manual during FY 2008. | **Ongoing** | **I** | | | √ | √ | **Housing Choice Administration** |
| Prequalification of Units | | This activity is focused on establishing a methodology to pre-qualify available housing units prior to listing on AHA's website. AHA is postponing the development and implementation of this activity until FY 2009. | **Postponed** | **PP** | | | √ | √ | **Housing Choice Administration** |
| Automated Collections Process | | This activity focuses on the development and implementation of an automated system for fraud recovery and tracking of repayment agreements in the voucher program. AHA is postponing the development and implementation of this initiative until FY 2009. | **Postponed** | **PP** | | | √ | √ | **Housing Choice Administration** |
| Standards for Residency in Single Family Homes | Single Family Unit Residency/Homeownership Standards<br><br>Standards for Residency in Single Family Home | AHA will adopt and implement single family home eligibility standards (1-4 units) to assure that families are prepared financially and otherwise to live in single family homes and be successful in neighborhoods. | **Priority** | **P** | | √ | √ | √ | **Housing Choice Administration** |
| Homeownership Standards | Single Family Unit Residency/Homeownership Standards | AHA will review and refine certain eligibility criteria and standards for using the voucher for homeownership and open the voucher waiting list for families that demonstrate homeownership readiness. | **Priority** | **P** | | √ | √ | √ | **Housing Choice Administration** |



**P** - Planning Phase, **I** - Implementation Phase, **PP** - Postponed

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| Intake/Waitlist Re-engineering | | AHA will design and implement a new intake process to align with CATALYST eligibility requirements. AHA will procure a third party vendor during FY 2008 to purge the existing Housing Choice waiting list to assure that all applicants are compliant and/or exempt from the work/program participation requirement. | **Priority** | **P** | | | √ | √ | **Housing Choice Administration** |
| Housing Choice Fair Market Rent Standards | Setting Market Rents Under Housing Choice Program | AHA has developed its own Payment Standards based on local market conditions and identified submarkets that exist within the City of Atlanta. Utilizing a third party Real Estate Market Research firm, the submarkets were determined in FY 2007, and in FY 2008 separate payment standard schedules will be implemented for each of the identified submarkets in the City of Atlanta upon establishment of new contracts and at the next recertification for existing contracts. | **Priority** | **P** | | √ | √ | √ | **Housing Choice Administration** |
| Program Moves | Residential Moves | During FY 2007, AHA began implementing strategies to reduce the number of moves participants make while in the program. AHA will allow moves only for a limited number of reasons, including, but not limited to, emergencies and foreclosures. During FY 2008, AHA will continue to implement and refine these strategies as part of its routine operations. | **Ongoing** | **I** | | √ | √ | √ | **Housing Choice Administration** |
| AHA Standards and Incoming/Outbound Ports | Modifications to Participant Portability Standards<br><br>AHA Standards and Outgoing Ports<br><br>AHA Standards and Incoming/Outgoing Ports | During FY 2008, AHA will work with the Housing Authority of Fulton County (HAFC) to develop a demonstration to enforce CATALYST and other MTW requirements on all AHA voucher holders ported to Fulton County. AHA will not establish limits on the number of families who can port but will apply Program Move guidelines to participants who desire to port out. In addition, inbound portability will only be accepted if the household is in full compliance with the work/program participation provisions and other CATALYST criteria. | **Priority** | **P** | √ | √ | √ | √ | **Housing Choice Administration** |
| Housing Choice Fixed Subsidy Initiative | | During FY 2008, AHA will implement changes in recertification requirements for certain households that have an interim income change. All interim reporting will be eliminated and a single annual and/or bi-annual recertification process will be implemented. AHA will conduct a rent impact analysis, obtain necessary Board of Commissioners approval, and submit the information to HUD as required by its MTW Agreement. Fixed deductions will be initiated pursuant to the impact analysis. | **Priority** | **P** | | | √ | √ | **Housing Choice Administration** |

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| Enhanced Business Systems (Family Obligations Document Enforcement, Enhanced Criminal Screening, and Health and Safety Standards | | As part of its Housing Choice Reform initiative, AHA will continue to refine the business processes associated with implementing CATALYST policies in the Housing Choice program. Enhanced business systems for implementing CATALYST policies, enhanced criminal screening and health and safety standards are established and will continue to be implemented as a part of Housing Choice routine operations during FY 2008. | **Priority** | **I** | √ | √ | √ | √ | **Housing Choice Administration** |
| Elderly Income Disregard | | On October 1, 2004, AHA implemented an income disregard for the Public Housing and Housing Choice programs for employment income earned by elderly residents or participants on fixed income. AHA will continue to recognize and implement this income disregard as part of its routine operations during FY 2008. | **Ongoing** | **I** | √ | √ | √ | √ | **Housing Choice Administration** |
| $125 Minimum Rent | Minimum Rent | AHA will keep its minimum rent at this level for FY 2008, and will continue to implement the $125 minimum rent as part of its routine operations during FY 2008. | **Ongoing** | **I** | √ | √ | √ | √ | **Housing Choice Administration** |
| Housing Choice Landlord Certification and Training | | AHA is delaying its plans to develop a mandatory Landlord Certification and Training Program to educate landlords on the requirements for placing and maintaining their properties in the Housing Choice Program, until FY 2009. However, landlord briefings are being implemented in March of 2007 and will continue into FY 2008 with the objective of providing an informational approach to AHA landlord expectations and program participation requirements. | **Priority** | **PP** | | √ | √ | √ | **Housing Choice Administration** |
| Housing Choice Inspection Fees | | AHA will charge landlords reasonable fees for pre-inspections and subsequent re-inspections following the initial re-inspection to cover the administrative costs associated with these additional inspections. Additionally, participant households may be charged a fee to cover the administrative costs of re-inspections due to certain deficiencies which are the responsibility of the household and remain unaddressed. AHA is delaying the implementation of this project. | **Postponed** | **PP** | | √ | √ | √ | **Housing Choice Administration** |

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| Place-based and People-based Deconcentration Strategy | Deconcentration Plan<br><br>Deconcentration Strategy | AHA will develop and implement a deconcentration strategy with the goal of decreasing the number of Housing Choice assisted families residing in areas of concentrated poverty. Briefing information to voucher holders will be revised in FY 2008 to identify areas of lower concentration of poverty to assist families to make informed choices in selecting residential locations. Marketing will be implemented to increase the number of professionally managed multifamily properties in areas of lower poverty. Statistical reporting will be developed and implemented to support monitoring of voucher movement under this project until FY 2009. | **Priority** | **P** | √ | √ | √ | √ | **Housing Choice Administration** |
| Enhanced Real Estate Inspection Systems | | During FY 2008, AHA will continue to use its higher inspection standards for all subsidized units and integrate various inspection processes and systems. | **Ongoing** | **I** | | √ | √ | √ | **Real Estate Management** |
| Enhanced Relocation Process and Database | Enhanced Relocation Process | In FY 2008, the Consolidated Relocation Management System (CRMS) will be integrated into the ORACLE E-business suite and simplified to remove duplicate data now existent in the Housing Choice data system. We will continue to refine and develop reports to provide additional support to the QLI, and the Relocation Implementation Plan and Procedures Manual will be completed and used as the guidebook for all relocation staff. AHA will coordinate the relocation of family communities with Atlanta Public Schools and expand the use of strategic partners and stakeholders to assist with relocation in support of revitalization and QLI activities. | **Ongoing** | **I** | | √ | √ | √ | **Housing Choice Administration** |
| | | **Asset Management** | | | | | | | |
| Asset Management | Asset Management Systems | AHA will continue to develop and evolve the systems, processes and procedures and human resources to create its comprehensive and integrated asset management capacity, with an emphasis on technology-oriented solutions. During FY 2008, AHA will consolidate a number of functions related to its real estate assets and relationships through the ongoing development of a comprehensive asset management and account services relationship system. | **Priority** | **P** | | √ | √ | √ | **Asset Management** |

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| Private Sector Innovation | Mixed-Income Communities "Working Laboratory" Initiative | The Owner Entities of the AHA-sponsored Mixed-Income Communities will use innovative approaches to achieve goals and objectives at their properties using AHA's Moving to Work flexibility.<br>* Conduct sponsored retreat with partners to identify opportunities for private sector innovation<br>* Create "Statement of Corporate Policies for Signature Communities and Related Investments" | **Priority** | **P** | | √ | √ | √ | **Asset Management** |
| Sustaining Mixed-Income Investments | Sustaining Mixed-Income Investments<br><br>Sustaining Mixed-Income Investments/Disposition of Public Housing Assisted Units at Mixed-Finance Communities | In order to promote the more effective and efficient operation of low income housing at AHA-sponsored Mixed-Income Communities, AHA will dispose of the public housing assisted units at these communities out from under the existing Annual Contributions Contract ("ACC"), as amended by the applicable Mixed-Finance Amendment to the ACC.<br>* Implement Summerdale as first demonstration project under this initiative | **Priority** | **P** | √ | √ | √ | √ | **Asset Management** |
| Innovative Subsidy Strategies | Explore Funding Switch/Rent Structure Subsidy Conversion | This supporting activity will provide innovative strategies for changing the Section 9 subsidy arrangement at AHA high-rise communities in a way that would benefit the most from a change in the subsidy structure. | **Priority** | **P** | √ | | √ | √ | **Asset Management** |
| Streamlining Property-Level Operations | Tax Credit Compliance Model | The central focus of this initiative is to streamline operating procedures at the property level by examining the various regulatory requirements that are attached to financing and funding development activities and looking for ways to reduce duplication of effort, obsolete systems, and powering up an approach that will allow AHA's business partners to provide data to AHA that can be used in meeting requirements in reporting back to HUD and other funding and equity sources.<br>* Bring in outside resource to survey various regulatory requirements and develop protocols for streamlining property-level operations and enhancing operating efficiencies | **Ongoing** | **P** | √ | √ | √ | √ | **Asset Management** |
| Fee-Based Contract Administration | | AHA earns ongoing administrative and incentive fees as a subcontractor to Georgia HAP Administrators (GA HAP), an eleven-agency consortium organized to provide project-based administration services to HUD. | **Ongoing** | **I** | | √ | √ | √ | **Asset Management** |
| Mark to Market Program | | As a Participating Administrative Entity, AHA conducts multi-family asset restructurings in Georgia and, in doing so, determines whether an asset should receive a rent reduction to market or enter into a debt restructuring to ensure that the asset will remain viable over a specified period of time, usually 20 years. | **Ongoing** | **I** | | √ | √ | √ | **Asset Management** |

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| Oversight of Turnkey III Assets | Close-Out of Turnkey III Homebuyers Program | AHA will continue to provide oversight to homeownership communities established under the Turnkey III program. | **Ongoing** | **I** | | √ | √ | √ | **Asset Management** |
| **Human Development** | | | | | | | | | |
| Human Development | | AHA will continue to facilitate and provide linkages for AHA-assisted families to human development and support services providers with goals of (a) economically independent families; (b) educated children; and (c) self-sufficient elderly and disabled persons. | **Ongoing** | **I** | | √ | √ | √ | **Real Estate Management** |
| Work/Program Participation Requirement | Program Requirements<br><br>Work Requirement<br><br>Program Participation Requirement | AHA will continue its work policy generally requiring that at least one non-disabled, non-elderly adult in the household work full-time at least 30 hours per week, and that all other non-disabled, non-elderly adults be in a combination of training programs or school. | **Priority** | **I** | √ | √ | √ | √ | **Real Estate Management** |
| Connections to Service Provider Network | | During FY 2008, AHA will continue to explore ways to improve the process of connecting AHA-assisted families to needed services. The agency will particularly develop ways to better connect the “hardest to serve” population who are often plagued with undiagnosed mental illness and illiteracy. AHA also plans to expand its contractual relationship with AWDA to serve as the “Section 3 Clearinghouse” for training and preparing AHA clients and client-owned businesses and matching them with employment and contract opportunities offered by AWDA business partners and AHA contractors. | **Priority** | **I** | | √ | √ | √ | **Real Estate Management** |
| Service Provider Network | | During FY 2008, AHA will continue to identify funding to support the work of the SPN and assist member organizations in developing programs and services to meet the ongoing needs of AHA-assisted families. AHA will also identify additional service providers that offer job training/placement services, and mental health and counseling services to meet the needs of those families that are hardest to serve. In addition, AHA will recruit quality service providers from predominant areas where AHA-assisted families reside. | **Priority** | **I** | | √ | √ | √ | **Real Estate Management** |

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| CATALYST Resource Guide | CATALYST Resource Access Guide | AHA will continue to publish and distribute the CATALYST Resource Guide which provides information on organizations which offer educational services, disability services, employment and training, homeownership counseling services, childcare, and senior supportive services. During FY 2008, AHA will develop a metro-wide guide focusing on resources in predominant areas where families reside. | **Priority** | I | | √ | √ | √ | **Real Estate Management** |
| Housing Choice Family Self-Sufficiency Program Re-engineering | Housing Choice Family Self-Sufficiency (FSS) Program | During FY 2008, AHA will close out the former HUD FSS Program and develop a new simplified FSS Program. The new FSS Program will be marketed to tenant-based and project-based voucher participants as well as to AHA public housing assisted tenants at the Affordable Communities and Signature Properties. The newly designed FSS Program will provide a flat escrow available only towards the purchase of a home. | **Priority** | P | | | √ | √ | **Housing Choice Administration** |
| Human Development and Support Services | Human Services Management<br><br>Client Services | AHA decided several years ago that a critical component to the relocation process was investing in the affected residents during the development period, so that families would have an opportunity to work through any barriers to family or individual success in the newly revitalized community, in their new community with the Housing Choice voucher, or in another public housing assisted community. | **Priority** | I | √ | √ | √ | √ | **Real Estate Development & Acquisitions** |
| Atlanta Community Scholars Awards | | Launched in 2003, the Atlanta Community Scholars Awards (ACSA) is an Atlanta Housing Authority (AHA) initiative which provides post secondary scholarships to eligible AHA residents to attend the college, university or technical school of their choice. The goal of ACSA is to encourage more youth assisted by AHA to consider and pursue higher education in preparation for the workforce. | **Ongoing** | I | | | | √ | **Real Estate Management** |
| Customer and Community Relations | | AHA will continue the implementation of the customer and community relations phone line (1-888-AHA-4YOU) in order to effectively respond to citizen concerns and compliments regarding Housing Choice participants in their neighborhoods. | **Ongoing** | I | | | | √ | **Real Estate Management** |
| Good Neighbor Program II | Good Neighbor Program | AHA's Good Neighbor Program (GNP) is designed to coach and prepare AHA-assisted families to live and blend into the communities where they live and help them to understand and value their roles and responsibilities as good neighbors. The training will continue to be provided by Georgia State University during FY 2008. | **Priority** | I | | √ | √ | √ | **Housing Choice Administration** |

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| Individual Development Accounts (IDAs) | | In implementing this initiative, AHA plans to eliminate the existing earned income disregard and replace it with Individual Development Accounts (IDA) program for public housing assisted residents who are 18 to 61 years of age and who meet certain requirements. AHA has postponed the development and implementation of this program during FY 2009 | **Postponed** | **PP** | | √ | √ | √ | **Real Estate Management** |
| School Attendance Requirement | | During FY 2006, the Georgia state legislature passed a law that requires minors to be in school in order to receive a work permit. Because of this new law, AHA eliminated its FY 2005 requirement that 16 and 17 year olds work full-time if they are not in school and instead require all minors under 18 years of age to attend school as a condition of the household maintaining or receiving subsidy assistance. Although AHA has postponed the development and implementation of this initiative, the agency will continue to strengthen our partnership with Atlanta Public Schools, and will undertake a more aggressive enforcement of the lease requirement for youth to attend school. | **Postponed** | **PP** | | √ | √ | √ | **Real Estate Management** |
| Place-Based Supportive Services Strategy Pilot | | In partnership with AHA, the Atlanta Regional Commission (ARC) secured a $375,000 ROSS (Resident Opportunities and Self-Sufficiency) grant during FY 2007 that it will use to expand the focus of the NORC project to two additional AHA high-rise communities, namely, Cheshire Bridge Road and Piedmont Road. In addition, the NORC will be coordinating a "Leadership Marian" project to provide training to residents on leadership development, diversity, conflict resolution, team building and community development. A trained facilitator and translators will be hired to assist with developing better relationships and leadership among the residents at Marian Road and building strong "resident ambassadors" that can continue to keep the diverse ethnic population at Marian Road engaged and involved in the community | **Ongoing** | **I** | | √ | √ | √ | **Real Estate Management** |
| | | **Ongoing Business Operations** | | | | | | | |
| Asset Management Under the New Operating Subsidy Rule | | Throughout its MTW Agreement period, AHA will continue to exercise its regulatory flexibility as to how it has implemented project-based accounting, project-based management and asset management systems as contemplated under HUD's recently adopted Asset Management/Project Based Accounting Rule. | **Priority** | **I** | √ | √ | √ | √ | **Corporate Support** |

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|---|---|---|---|---|---|---|---|---|---|
| Project Based Accounting and Financial Systems | Project-Based Accounting and Financial Systems/Quarterly Financial Statements by Business Line | In FY 2008, further improvements will be made to AHA's information technology/financial reporting environment to expand beyond the property level. These and other enhancements to AHA's ORACLE automated system will also allow AHA to produce quarterly financial statements across the entire organization for all program operations. | **Priority** | **I** | | √ | √ | √ | **Corporate Support** |
| Fee-for-Service Methodology | | Under this system, AHA charges each property, program, or grant a fixed rate for administration and will continue the implementation of this methodology throughout the life of its MTW Agreement. AHA will continue to implement and refine the methodology in FY 2008. | **Priority** | **I** | | √ | √ | √ | **Corporate Support** |
| Utility Allowance Waiver | | Based on the existing condition of the AHA real estate portfolio including aging building infrastructures, minimum insulation and poor air circulation, AHA will consider adjusting the tenant utility allowances to account for the utility usage required to maintain quality of life. | **Priority** | **P** | | | √ | √ | **Corporate Support** |
| Energy Performance Contracting | | In light of the dynamic impact of AHA's revitalization program and Quality of Life Initiative on the ongoing operations of AHA-owned public housing assisted properties, AHA will consider establishing and managing its own energy performance program. This program may include, but will not be limited to, self-financing and implementing additional improvements at properties that AHA will continue to own and operate on a long-term basis. | **Ongoing** | **P** | | | | √ | **Corporate Support** |
| Procurement Enhancements | | AHA will continue to comply with procurement regulations at 24 C.F.R. 85.36 as modified by other applicable regulations and by AHA's MTW Agreement and related agreements, implementation protocols, and applicable waivers. However, AHA will continue to make enhancements to its procurement policies and procedures to improve efficiency and effectiveness. AHA set its micro-purchasing level at $5,000 and will utilize contracts with terms in excess of five years for strategic services. | **Ongoing** | **I** | | | | √ | **Corporate Support** |
| Financial Operations/Single Fund/MTW Block Grant Management | | During FY 2008, AHA will continue to combine the income from three programs into a Single Fund in carrying out the activities of its MTW Agreement and related Plans and implementation protocols. Low income Operating Subsidy and related income from property operations, Housing Choice Voucher Income, and Capital Fund Program Income will be used interchangeably for eligible MTW purposes. AHA will also use other program funds such as HOPE VI, and Development Grants, to carry out activities related to those grants which are aligned with AHA's Business Plan. | **Priority** | **I** | √ | √ | √ | √ | **Corporate Support** |

| Supporting Activity Name | Former Activity Name(s), If Applicable | FY 2008 Activity Description | FY 2008 Prioritization | Status as of 1/31/07 | FY 2005 | FY 2006 | FY 2007 | FY 2008 | Business Line |
|---|---|---|---|---|---|---|---|---|---|
| Enhanced Accessibility Initiative | Accessibility | AHA is committed to making its facilities and programs accessible to persons with disabilities. AHA's commitment is reflected in its Accessibility Policies included in its Statement of Corporate Policies Governing the Leasing and Residency of Assisted Apartments (Statement of Corporate Policies) – (**Appendix N**) and Housing Choice Administrative Plan – (**Appendix O**). As part of AHA's strategy for accomplishing these efforts, AHA will implement activities pursuant to a voluntary compliance agreement with HUD, a four-year agreement which became effective on March 15, 2007. | **Priority** | **I** | | | √ | √ | **Real Estate Management** |
| Corporate Policies Governing Eligibility, Occupancy, and Program Administration | Statement of Corporate Policies Governing the Leasing and Residency of Assisted Apartments | AHA continues to revise its policy documents to incorporate policy changes supporting its Business Plan. | **Ongoing** | **I** | √ | √ | √ | √ | **Corporate Support** |
| 4 to 1 Elderly Admissions Policy | Elderly Admissions Preference | This admissions policy allows the PMCOs to admit 4 elderly (62 and older) or almost elderly (55-61) residents on the waiting list before admitting a young disabled resident until such time as an optimal mix of elderly/almost elderly and young disabled residents is reached for the community. | **Priority** | **I** | √ | √ | √ | √ | **Real Estate Management** |
| Permanent Designated Housing | | AHA plans to designate one or more of the communities listed in **Appendix P** as percentage-based mixed population, elderly only, disabled only, or non-elderly disabled only. AHA will implement permanent designations for existing units to support the repositioning of its senior high-rise communities and for new units in the development of designated housing in connection with its revitalization efforts | **Priority** | **I** | √ | √ | √ | √ | **Real Estate Development & Acquisitions** |
| Affordable Fixed Rent Demonstration | Affordable Flat Rent Demonstration | AHA will use research and financial analysis conducted in FY 2007 to select one or more of its conventional public housing communities for participation in an affordable fixed rent demonstration that AHA will launch during FY 2008. | **Priority** | **P** | √ | √ | √ | √ | **Real Estate Management** |

| Supporting Activity Name | Former Activity Name(s), If Applicable | FY 2008 Activity Description | FY 2008 Prioritization | Status as of 1/31/07 | FY 2005 | FY 2006 | FY 2007 | FY 2008 | Business Line |
|---|---|---|---|---|---|---|---|---|---|
| Enhanced Business Systems | Clean and Safe Environment<br><br>Enhanced Business Systems (Lease Enforcement, Enhanced Criminal Screening, and Health and Safety Standards) | AHA/PMCO team continues enforcement of stricter lease standards, criminal screening, and health and safety standards. | **Priority** | I | √ | √ | √ | √ | **Real Estate Management** |
| Elderly Income Disregard | | AHA will continue to implement an income disregard that excludes employment income earned by elderly residents or participants on fixed income. | **Priority** | I | √ | √ | √ | √ | **Real Estate Management** |
| $125 Minimum Rent | Minimum Rent | AHA will continue its minimum rent of $125. Households on fixed incomes, where all members are either elderly or disabled, are exempt from the minimum rent increase and will pay based on 30% of their adjusted gross incomes. | **Priority** | I | √ | √ | √ | √ | **Real Estate Management** |
| Enhanced Real Estate Inspection Systems | | AHA will continue to refine and improve the quality assurance (QA) inspections process for AHA-owned communities. Through its integrated inspections system, AHA will continue to inspect units at each of its communities, at least once per year. | **Ongoing** | I | | √ | √ | √ | **Real Estate Management** |
| Comcast Cable Partnership | | Use technology at high-rises to improve quality of life for elderly & disabled by giving access to two primary cable channels: Security channel carries security camera feeds; Info channel broadcasts alerts and other announcements. | **Ongoing** | I | | √ | √ | √ | **Real Estate Management** |
| Video Call Down Systems | | Complete installation of video call down systems at AHA family communities and assess impact on community security post-implementation. | **Ongoing** | I | | √ | √ | √ | **Real Estate Management** |
| Organizational Initiatives | Communications Plan<br><br>Corporate Culture Project<br><br>Human Resources Development | Includes Corporate Culture Project, Human Resources Development & Communications Plan | **Ongoing** | I | | √ | √ | √ | **Corporate Support** |

| Supporting Activity Name | Former Activity Name(s), If Applicable | FY 2008 Activity Description | FY 2008 Prioritization | Status as of 1/31/07 | FY 2005 | FY 2006 | FY 2007 | FY 2008 | Business Line |
|---|---|---|---|---|---|---|---|---|---|
| Measuring Success – Moving to Work | | The Boston Research Group will continue to measure the impact of AHA's Moving to Work Program on the quality of life, levels of crime, poverty, & other social ills associated with concentrated poverty. | **Priority** | I | | √ | √ | √ | **Corporate Support** |

## Appendix G: Public Review and Plan Changes

### Public Review

AHA's Business Plan and Implementation Plans are the products of an inclusive and comprehensive annual 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, local HUD Office, the Georgia Law Center for the Homeless, and Atlanta Legal Aid Society and other members of the public. AHA provided draft copies of the Implementation Plan for feedback to most of these stakeholders, posted the draft Implementation Plan on its website, and also conducted comprehensive presentations on selected components of the Implementation Plan.

On Thursday, April 19, 2007, AHA held a public hearing to present its Implementation Plan, *Statement of Corporate Policies Governing the Leasing and Residency of Assisted Apartments*, and *Administrative Plan Governing the Housing Choice Voucher Program* and to receive comments from residents, participants, and the general public. The Public Hearing was held at Atlanta City Hall located at 55 Trinity Avenue, S.W., Atlanta, Georgia, and was broadcasted via the City's public Comcast Cable Channel 26 and approximately 200 individuals attended. The live broadcast was accessible to residents at AHA's 17 senior high-rise communities. Notice of the FY 2008 Annual Plan Public Hearing was posted in the following newspaper publications on the following dates:

- Atlanta Journal Constitution
  - February 25, 2007
  - March 25, 2007

- The Atlanta Voice
  - February 22, 2007
  - March 22, 2007

- The Atlanta Latino
  - February 22, 2007
  - March 22, 2007

- The Atlanta Daily Word
  - February 22, 2007
  - March 22, 2007

In addition, AHA mailed a letter of notification to all AHA-assisted families offering public transportation reimbursement. Every AHA Affordable Community posted the notice in the management office where it could be easily viewed by residents.

Valuable comments and suggestions were made at the consultation meetings and public hearing. AHA has considered and appropriately addressed and/or incorporated comments into its Implementation Plan.

**Plan Changes**

Moving forward, AHA may make changes to the Implementation Plan without a public hearing or resident consultation provided that such changes do not constitute a "substantial deviation" or "significant amendment or modification." A "substantial deviation" or "significant amendment or modification" to the Implementation Plan is defined as changes, modifications, or amendments that materially and significantly modify AHA's three primary goals. A change in AHA's objectives or strategies in reaching those goals will not be considered a "substantial deviation" or "significant amendment or modification."

## AHA's Quality of Life Initiative

### What is the Quality of Life Initiative?

The **Quality of Life Initiative** will allow families in AHA's remaining conventional public housing projects the opportunity to relocate from an environment of concentrated poverty, consistent with AHA's vision of providing eligible families with **access to affordable housing**, while **deconcentrating poverty** and **building healthy communities**.

### Why now?

- Despite the revitalization of more than a dozen AHA communities, the privatization of property management, and implementation of organizational efficiencies, more than 5,500 AHA families still live in the economically and socially detrimental conditions of **concentrated poverty**.
- A negotiated agreement with HUD has given AHA a **window of opportunity** (July 1, 2003 – June 30, 2010) during which the agency has financial and regulatory flexibility in addressing Atlanta's affordable housing needs.
- The per-unit cost that HUD funds has dropped from 98.1% in 2005 to 76% in 2007, worsening the conditions at Atlanta's already **obsolete public housing projects**.

### What will happen to the families?

- AHA will utilize **Responsible Relocation** in coordination with Atlanta Public Schools and other community stakeholders. Responsible Relocation ensures choice, support and **successful outcomes** for each family.

- Intensive human service case management will:
  --- **Support the families** pre- and post-relocation
  --- Promote **successful transition** of families to new communities
  --- Increase **self-sufficiency**
  --- Assist in **achieving personal goals**

- The Relocation Team will provide the families with the tools to make informed choices about the **best housing opportunities**:

  - AHA high-rise communities (seniors and the disabled)
  - Private mixed-income rental communities with a limited percentage of project based rental assistance
  - Housing Choice tenant based vouchers

**How will this initiative impact neighborhoods?**

The Relocation Team will manage the relocation of families with **thoughtful consideration** of the impact on Atlanta's neighborhoods, with assistance from:

--- Georgia State University to **prepare families** to be successful neighbors
--- Human Development and Support Services **coaching and counseling** services
--- 1-888-AHA-4YOU – 24-hour **customer service hotline** for Atlanta's citizens

**Relocation Schedule**

| Property | Units | Start Date | End Date |
| --- | --- | --- | --- |
| Leila Valley | 124 | Apr-07 | Oct-07 |
| U-Rescue Villa | 70 | Jun-07 | Feb-08 |
| Jonesboro North | 100 | Jun-07 | Jan-08 |
| Jonesboro South | 150 | Jun-07 | Jan-08 |
| Englewood Manor | 320 | Jun-07 | Jan-08 |
| Palmer House* | 250 | Jan-08 | May-09 |
| Thomasville Heights | 350 | Feb-08 | Jan-09 |
| Bowen Homes | 650 | Feb-08 | Mar-09 |
| Herndon Homes | 273 | Apr-09 | Jan-10 |
| Hollywood Courts | 202 | Apr-09 | Jan-10 |
| Bankhead Courts | 386 | Apr-09 | Mar-10 |
| Roosevelt House* | 257 | Jun-09 | Mar-10 |

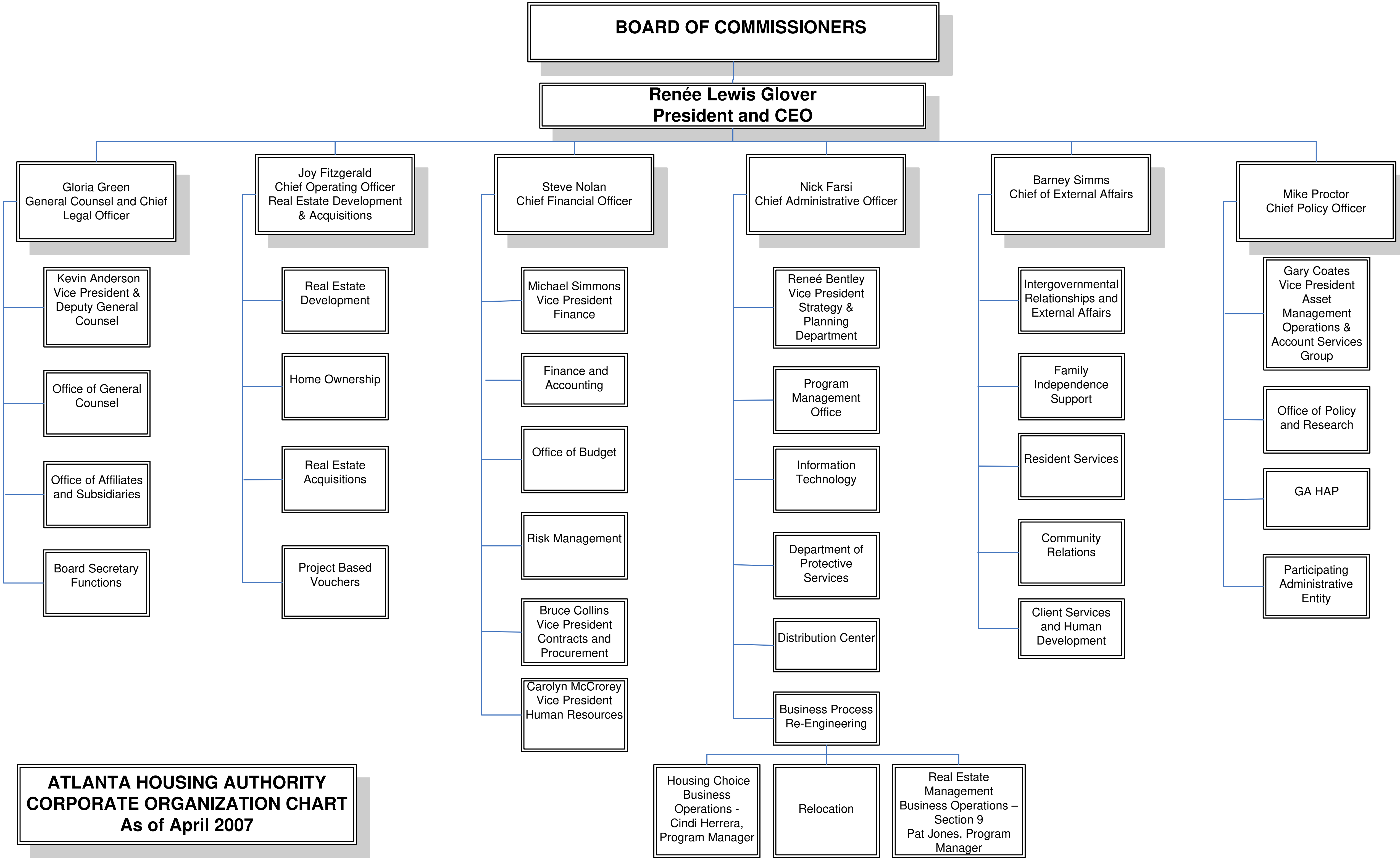
Source: Atlanta Housing Authority

*Senior High-Rises

**More information**

- Barney Simms, *Chief External Affairs Officer*
  (404) 817-7449

# ATLANTA HOUSING AUTHORITY CORPORATE ORGANIZATION CHART As of April 2007



## Appendix J: Candidate Communities or Properties for Demolition, Disposition, Innovative Subsidy Strategies, Rent Restructuring and/or Other Repositioning Activities

**Candidate Communities for Demolition, Disposition, Innovative Subsidy Strategies, Rent Restructuring and/or Other Repositioning Activities***

| High-Rise Communities** | Family Communities** |
|---|---|
| Antoine Graves*** | Bankhead Courts***** |
| Barge Road | Bowen Apartments***** |
| Cheshire Bridge | Capitol Homes**** |
| Cosby Spear Towers | Carver Homes**** |
| East Lake Towers | Englewood Manor***** |
| Georgia Avenue | Grady Homes**** |
| Graves Annex*** | Harris Homes**** |
| Hightower Manor | Herndon Homes***** |
| John O. Chiles*** | Hollywood Courts***** |
| Juniper & 10th | Jonesboro North***** |
| Marian Road | Jonesboro South***** |
| Marietta Road | Leila Valley***** |
| M.L. King Tower*** | Martin Street Plaza |
| Palmer House***** | McDaniel Glenn**** |
| Peachtree Road | Perry Homes**** |
| Piedmont Road | Thomasville Heights***** |
| Roosevelt House***** | U-Rescue Villa***** |
| | University Apartments*** |
| | Westminster |

*The reference to demolition or disposition includes the complete or partial demolition or disposition of the community.
**Any reference to a community includes associated non-residential structures, including community centers.
***These communities are in pre-development, i.e. AHA has made an internal decision and initiated steps to redevelop these communities. The John O. Chiles Main Building received a Low Income Housing Tax Credit allocation in September 2006.
****These communities are already in an active redevelopment process including master planning, resident relocation, demolition, disposition, construction, and lease-up.
*****These communities are part of AHA's Quality of Life Initiative.
Candidate communities for Innovative Subsidy Strategies as described in Part V of this plan.

**Candidate Communities for Disposition* and/or Rent Restructuring****

| Mixed-Income Communities |
|---|
| Ashley Courts at Cascade |
| Ashley Terrace at West End |
| Auburn Pointe |
| Capitol Gateway |
| Centennial Place |
| CollegeTown at West End |
| Columbia Commons |
| Columbia Village |
| Magnolia Park |
| McDaniel Glenn Revitalization |
| Summerdale Commons |
| The Village at Castleberry Hill |
| The Villages at Carver |
| The Villages of East Lake |
| West Highlands at Heman E. Perry Boulevard |

*These properties are subject to disposition scenarios as detailed in AHA's FY 2007 Implementation Plan (including Supplemental Information) approved by HUD, and as further clarified in Part V of the FY 2008 Implementation Plan.

**Affect ACC units only.

**Candidate Properties for Demolition and/or Disposition***

| **Property** |
| --- |
| Facilities Maintenance Shop (568 Humphries Street) |
| Facilities Maintenance Shop (749 McDaniel Street and adjacent parcels) |
| Fulton Street/McDaniel Glenn Vacant Property |
| Gilbert Gardens Annex |
| Harland Discovery Teen Center (423 Peeples Street, S.W., Atlanta, Georgia 30310) |
| John Hope Model Building |
| North Avenue Warehouse (301 North Avenue) |
| Perry Homes Park Land Swap |

*The reference to demolition or disposition includes the complete or partial demolition or disposition of the property.

The list of properties below was acquired by AHA through a land swap with College Partners, Inc. (CPI) and subsequent condemnations as part of the revitalization of Harris Homes. These properties are also candidates for demolition and/or disposition.

| Map I.D. # | Property Address | Parcel I.D. |
| --- | --- | --- |
| A2 | 333 Ashby Street | 14-0117-0003-013 |
| A4 | 926 Westview Drive | 14-0117-0003-010 |
| A5 | 930 Westview Drive | 14-0117-0003-009 |
| A6 | Westview Drive | 14-0117-0003-008 |
| A7 | 938 Westview Drive | 14-0117-0003-007 |
| A8 | 940-42 Westview Dr. | 14-0117-0003-064 |
| A9 | 944-46 Westview Dr. | 14-0117-0003-004 |
| A10 | 948 Westview Drive | 14-0117-0003-003 |
| A11 | 952 Westview Drive | 14-0117-0003-002 |
| A12 | 316 Abbott Street | 14-0117-0003-055 |
| A13 | 320 Abbott Street | 14-0117-0003-017 |
| B1 | 311 Abbott Street | 14-0117-0002-024 |
| B2 | 307 Abbott Street | 14-0117-0002-023 |
| B3 | 303 Abbott Street | 14-0117-0002-022 |
| B4 | 299 Abbott Street | 14-0117-0002-021 |
| B5 | 978 Westview Drive | 14-0117-0002-101 |
| B6 | 984 Westview Drive | 14-0117-0002-099 |
| B7 | 990 Westview Drive | 14-0117-0002-100 |
| B8 | 994 Westview Drive | 14-0117-0002-019 |
| B9 | 998 Westview Drive | 14-0117-0002-018 |
| B10 | Westview Drive | 14-0117-0002-017 |
| B11 | Baldwin Place | 14-0117-0002-029 |
| B12 | 304 Baldwin Place | 14-0117-0002-028 |
| B13 | 1007 Baldwin Street | 14-0117-0002-027 |
| B14*** | 1003 Baldwin Street | 14-0117-0002-026 |
| B15 | 993 Baldwin Street | 14-0117-0002-025 |
| C1 | 315 Baldwin Place | 14-0117-0002-035 |
| C2 | Vacant Lot | 14-0117-0002-034 |
| C3 | 309 Baldwin Place | 14-0117-0002-033 |
| C4 | 303 Baldwin Street | 14-0117-0002-032 |
| C5 | 297 Baldwin Street | 14-0117-0002-031 |
| C6 | 291 Baldwin Street | 14-0117-0002-030 |
| C8 | 1012 Westview Drive | 14-0117-0002-015 |

| Map I.D. # | Property Address | Parcel I.D. |
|---|---|---|
| C9 | Westview Drive | 14-0117-0002-014 |
| C10 | 1018 Westview Drive | 14-0117-0002-013 |
| C11 | 1020 Westview Drive | 14-0117-0002-012 |
| C12 | 1022 Westview Drive | 14-0117-0002-011 |
| C13 | 1026 Westview Drive | 14-0117-0002-010 |
| C14 | 1030 Westview Drive | 14-0117-0002-009 |
| C15 | 1032 Westview Drive | 14-0117-0002-008 |
| C16 | 1036 Westview Drive | 14-0117-0002-007 |
| C17 | 1040 Westview Drive | 14-0117-0002-006 |
| C18 | 1044 Westview Drive | 14-0117-0002-005 |
| C19 | 1052-54 Westview Dr. | 14-0117-0002-004 |
| C20 | Westview Drive | 14-0117-0002-003 |
| C21 | 1056 Westview Dr. | 14-0117-0002-002 |
| C22 | 1060 Westview Drive | 14-0117-0002-001 |
| C23 | 1059 Baldwin Street | 14-0117-0002-095 |
| C25 | 1041 Baldwin Street | 14-0117-0002-039 |
| C26 | 1037 Baldwin Street | 14-0117-0002-038 |
| C27 | 1031 Baldwin Street | 14-0117-0002-037 |
| C28 | 1027 Baldwin Street | 14-0117-0002-036 |
| C29 | Baldwin Street | 14-0117-0002-045 |
| C30 | Baldwin Street | 14-0117-0002-046 |
| D1 | 295 – 299 Ashby Street | 14-0116-0010-119 |
| D2 | 931 Westview Drive | 14-0116-0010-089 |
| D3 | 935 Westview Drive | 14-0116-0010-090 |
| D4 | 939 Westview Drive | 14-0116-0010-091 |
| D5 | 443 Westview Drive | 14-0116-0010-092 |
| D6 | Westview Drive | 14-0116-0010-093 |
| D7 | 949 Westview Drive | 14-0116-0010-094 |
| D8 | 953 Westview Drive | 14-0116-0010-095 |
| D9 | 957 Westview Drive | 14-0116-0010-096 |
| D10 | 961 Westview Drive | 14-0116-0010-108 |
| D11 | 967 Westview Drive | 14-0116-0010-099 |
| D12 | 975 Westview Drive | 14-0116-0010-100 |
| D14 | 981 Westview Drive | 14-0116-0010-030 |
| D15 | 985 Westview Drive | 14-0116-0010-029 |
| D16 | 993 Westview Drive | 14-0116-0010-028 |
| D17 | Westview Drive | 14-0116-0010-027 |
| D18 | 285 Ashby Street | 14-0116-0010-086 |
| D19 | 279-281 Ashby Street | 14-0116-0010-085 |
| D20 | 928-930 Frank Street | 14-0116-0010-084 |
| D21 | Frank Street | 14-0116-0010-083 |
| D22 | 936 Frank Street | 14-0116-0010-082 |
| D24 | 944 Frank Street | 14-0116-0010-080 |
| D25 | 948 Frank Street | 14-0116-0010-079 |
| D26 | 952 Frank Street | 14-0116-0010-078 |
| D27 | 954 Frank Street | 14-0116-0010-077 |
| D28 | 960 Frank Street | 14-0116-0010-076 |
| D30 | 968 Frank Street | 14-0116-0010-074 |
| D31 | 980 Frank Street | 14-0116-0010-109 |

_____ - Condemned Lots

*** Part of Lot B14 was acquired from CPI at closing and part was acquired by condemnation

The properties below are additional sites that AHA has acquired as part of the revitalization of Harris Homes.  These properties are also candidates for demolition and/or disposition.

| Property Address | Parcel I.D. |
|---|---|
| 406 Lawton Street | 14-0117-LL-0010 |
| 940 Frank Street | 14-0116-0010-0810 |

These properties below are sites that AHA continues to own and control as part of the revitalization of Techwood/Clark Howell Homes.  These properties are also candidates for demolition and/or disposition.

| Property Name | Address |
|---|---|
| Centennial Place Community Center | 526 Merritts Avenue, Atlanta, Georgia |
| The Coupla Building | 480 Centennial Olympic Park Drive, Atlanta, Georgia |

## Appendix K: Management Information for Leased Housing

### Units Under Lease/Target Lease-Up Rate

AHA reports unit leasing information to HUD through the quarterly Housing Choice Voucher Form 52681-B financial submissions. AHA will no longer report this information in its Plan pursuant to HUD's approval on January 12, 2006 correspondence of AHA's FY 2006 CATALYST Implementation Plan which included a revision of required submissions in AHA's MTW Annual Plans and Reports.

Pursuant to AHA's MTW Agreement, AHA expects to meet the budget utilization rate benchmark of 98% for the next fiscal year. As part of AHA's FY 2008 Implementation Plan, AHA has included clarifying language that the 98% expenditure rate only applies to vouchers that are fully funded during AHA's entire fiscal year, and that any new vouchers received intermittently during the fiscal year are excluded from the 98% requirement until the following fiscal year until such time that a 12-month period has elapsed (see **Appendix O**). AHA is making this clarification in light of changes that HUD has made in funding vouchers based on a calendar year versus a fiscal year.

### Plans Regarding Ensuring Rent Reasonableness, Expanding Housing Opportunities and Deconcentration of Low Income Families

AHA's policies for ensuring rent reasonableness, expanding housing opportunities and deconcentration of low-income families are set forth in AHA's Housing Choice Administrative Plan, at **Appendix O**. AHA has described the projects and policy changes AHA will implement during FY 2008 which will address rent reasonableness, housing opportunities and deconcentration in Part II of this plan.

### Inspections

As of June 30, 2006, AHA completed annual inspections on 98% of the total units under contract and performed quality control inspections on 5% of all approved units. We will continue to enforce our enhanced inspections standards during FY 2008 and inspect 98% of all units under contract. Quality Control inspections will also continue for a minimum of 5% of all initial inspections.

# Fiscal Year 2008 Comprehensive Operating and Capital Budget

*The Housing Authority of the City of Atlanta, Georgia*

To be submitted to the Board of Commissioners June 27, 2007*

| AHA Programs | MTW Funds | Development, HOPE VI, and RHF | Housing Choice non-MTW Vouchers | M2M | GA HAP | CDBG | Development and Other Fees | |
|---|---|---|---|---|---|---|---|---|
| **OPERATING REVENUES** | | | | | | | | |
| Rental Revenue | **$12,762,028** | | | | | | | $12,762,028 |
| Low Income Operating Subsidy | **30,000,000** | | | | | | | 30,000,000 |
| Housing Choice Operating Subsidy | **129,528,520** | | 4,775,658 | | | | | 134,304,178 |
| Capital Funds Program | **3,609,518** | | | | | | | 3,609,518 |
| Development, HOPE VI, and RHF grants used for Human Services, Relocations, and Adminstration | **0** | 2,700,000 | | | | | | 2,700,000 |
| Soft Grants | **0** | | | | | 17,000 | | 17,000 |
| Development and Transaction Fees | **0** | | | | | | 3,207,500 | 3,207,500 |
| Other Revenue | **1,197,184** | | | 50,000 | 1,576,160 | | | 2,823,344 |
| **Total Operating Income** | **$177,097,250** | **$2,700,000** | **$4,775,658** | **$50,000** | **$1,576,160** | **$17,000** | **$3,207,500** | **$189,423,568** |
| **Uses** | | | | | | | | |
| **OPERATING EXPENSES** | | | | | | | | |
| Administrative | **$45,544,713** | $2,700,000 | | 20,000 | 315,232 | 17,000 | | $48,596,945 |
| Housing Assistance Payments | **80,177,516** | | 5,233,632 | | | | | 85,411,148 |
| Resident Services | **7,523,380** | | | | | | | 7,523,380 |
| Utilities | **15,886,616** | | | | | | | 15,886,616 |
| Ordinary Maintenance and Operation | **13,504,068** | | | | | | | 13,504,068 |
| Protective Services | **4,965,706** | | | | | | | 4,965,706 |
| Deprogrammed Expenses | **1,759,015** | | | | | | | 1,759,015 |
| General Expenses (incl $1 million Contingency) | **3,483,250** | | | | | | | 3,483,250 |
| **PILOT** | **700,000** | | | | | | | 700,000 |
| **Total Operating Expenses** | **173,544,264** | **2,700,000** | **5,233,632** | **20,000** | **315,232** | **17,000** | **0** | **181,830,128** |
| | | | | | | | | |
| **NET OPERATING GAIN/(LOSS) before Depreciation** | **3,552,986** | **0** | **(457,974)** | **30,000** | **1,260,928** | **0** | **3,207,500** | **7,593,440** |
| Depreciation Expense | **11,660,253** | | | | | | | 11,660,253 |
| **NET OPERATING GAIN/(LOSS) after depreciation** | **(8,107,267)** | **0** | **(457,974)** | **30,000** | **1,260,928** | **0** | **3,207,500** | **(4,066,813)** |

# Fiscal Year 2008 Comprehensive Operating and Capital Budget

*The Housing Authority of the City of Atlanta, Georgia*

Atlanta Housing Authority

To be submitted to the Board of Commissioners June 27, 2007*

| AHA Programs | MTW Funds | Development, HOPE VI, and RHF | Housing Choice non-MTW Vouchers | M2M | GA HAP | CDBG | Development and Other Fees | |
|---|---|---|---|---|---|---|---|---|
| **NON-OPERATING REVENUES** | | | | | | | | |
| Modernization and Capital Improvements | **8,690,482** | | | | | | | 8,690,482 |
| Interest Income | **2,406,220** | | | | | | | 2,406,220 |
| **Total Non-operating Revenues** | 11,096,702 | | | | | | | 11,096,702 |
| | | | | | | | | |
| **NON-OPERATING EXPENDITURES** | | | | | | | | |
| Loss on Sale of Fixed Asset | **19,643,186** | | | | | | | 19,643,186 |
| Demolition | **5,157,000** | | | | | | | 5,157,000 |
| Capital Improvements | **2,000,000** | | | | | | | 2,000,000 |
| Interest Expense | **233,856** | 682,500 | | | | | | 916,356 |
| Amortization of debt | **700,095** | | | | | | | 700,095 |
| **Total Non-operating Uses of Funds** | **27,734,137** | **682,500** | **0** | **0** | **0** | **0** | **0** | **28,416,637** |
| | | | | | | | | |
| **NET NON-OPERATING GAIN/(LOSS)** | **(16,637,435)** | **(682,500)** | **0** | **0** | **0** | **0** | **0** | **(17,319,935)** |
| | | | | | | | | |
| **CHANGE IN NET ASSETS BEFORE REVITALIZATION IMPACT** | **($24,744,703)** | **($682,500)** | **($457,974)** | **$30,000** | **$1,260,928** | **$0** | **$3,207,500** | **($21,386,749)** |
| Increase in Net Assets resulting from Revitalization | **0** | 32,367,000 | | | | | | **$32,367,000** |
| **CHANGE IN NET ASSETS AFTER REVITALIZATION IMPACT** | **($24,744,703)** | **$31,684,500** | **($457,974)** | **$30,000** | **$1,260,928** | **$0** | **$3,207,500** | **$10,980,251** |

* The Fiscal Year 2008 Comprehensive Operating and Capital Budget is scheduled to be presented to AHA's Board of Commissioners for approval on June 27, 2007. AHA will submit a revised table to HUD if substantial changes are made in the approved version.

NOTE: At the time of this printing, AHA had not yet completed the FY 2008 Budget Process. This narrative and the numbers contained therein are to be considered draft. The final budget will be submitted to the Board of Commissioners during the June 2007 Board Meeting.

# The FY 2008 Budget

AHA will enter the fifth year of its seven-year Moving to Work (MTW) Agreement in FY 2008. The Comprehensive Operating and Capital Budget for FY 2008 estimates an increase in Net Assets, primarily due to the increase in assets from development activity and capital improvements.

## Change in Net Assets

AHA anticipates an increase in its Net Assets during FY 2008. Under its revitalization efforts, AHA serves as the Sponsor during the development phase of mixed-income developments and thereafter relates to these properties as a lender, investor and ground lessor. AHA's Net Assets will increase when it provides loans to the owner of mixed-income developments and will earn development and other transaction fees during FY 2008.

In addition, AHA's Net Assets increase from capital improvements made to AHA-owned properties. The capital improvements are funded from Capital Program grants from HUD.

Finally, AHA will record accounting losses related to the demolition and write off of properties under the QLI program which will offset the gains.

## Operating Revenues over Expenses

AHA expects operating revenues to exceed operating expenses on a consolidated basis. AHA operations include both MTW-related programs and non-MTW programs. The non-MTW programs are projected to provide a net income in FY 2008 related in part to developer and other transaction fees earned in conjunction with mixed-income transactions.

## Equity Investment

AHA established funding for equity investment in FY 2006 in order to take advantage of opportunities to invest in real estate for future development or sale in order to maximize return on investment and further AHA's goals and objectives under the Business Plan. Currently, AHA earns very low interest rates due to HUD restrictions. Under HUD guidelines, restricted cash may only be invested in government-backed securities. In FY 2006, AHA established this funding with $12 million earned from the Housing Choice Program.

## MTW Working Capital (Reserves)

AHA's MTW working capital (current assets less current liabilities) is sufficient to support AHA's MTW operations in FY 2008.

## Congressional Appropriations Process

The AHA FY 2008 budget includes six months which will be funded in Federal Fiscal Year (FFY) 2008. These budgets have been prepared prior to the final approval of the FFY 2008 HUD budget by Congress and the President of the United States. The Public Housing, Housing

Choice Voucher, and Capital programs are funded through an annual appropriations process. However, because the Congressional appropriations process is not complete, we cannot be sure of the outcome of the appropriations process and its impact on AHA's funding levels, especially in light of competing national priorities. Therefore, an amendment to the FY 2008 budget may be required after the appropriations process is concluded if substantial reductions are adopted by Congress and the President.

## General Assumptions of this Budget

As described in AHA's FY 2008 Implementation Plan, AHA's activities for FY 2008 will be centered on three primary goals:

- Maximize AHA's economic viability and sustainability.
- Provide quality affordable housing opportunities in mixed-income communities with access to excellent quality of life amenities.
- Facilitate opportunities for families and individuals to build wealth and reduce their dependency on subsidy, ultimately becoming financially independent.

This budget was developed to support these goals. In addition, until their full implementation, the budget seeks to:

- Ensure the health and safety of residents and the preservation of AHA-owned properties.
- Improve the quality of life for residents and the quality of AHA's product.
- Invest in technological solutions that will improve operations in the areas of financial reporting, Housing Choice operations, security, and the development and management of a corporate database.
- Enhance AHA's asset management capabilities.

Recognizing the current budget realities and constraints, AHA's budget reflects that AHA's first priority is to sustain the delivery of affordable housing and services to families at the properties.

## Other Assumptions

- Funding levels provided in this Budget Book are based on information available at publishing. At this time, the actual level of funding in many programs is subject to the FFY 2007 and FY 2008 HUD funding processes.

  Effective in 2006, HUD funds both Housing Choice and Low Income Housing Programs on a Calendar Year Basis (January through December). AHA, on the other hand operates on a Fiscal Year basis (July through June.) Therefore, AHA's budget year 2007 crosses two HUD funding Years, 2006 and 2007.

  At the time of publication, HUD had not provided AHA final funding numbers for Federal funding year 2007 Low Income Housing Subsidy or Housing Choice Voucher Funding. Nor has HUD provided the Capital Fund Program award amount for 2007. HUD also has provided no definitive information regarding the levels of funding in 2008 which will affect the last six months of AHA's Fiscal Year.

- HOPE VI and other revitalization efforts will continue to reposition obsolete and distressed communities; and will allow AHA to focus our limited CFP funds on sustaining the high-rise and family communities until repositioning of such properties takes place. HOPE VI funds are multi-year and are addressed in the CAPITAL SECTION. (To be published separately.)

- All Multifamily Real Estate Properties owned by AHA and its corporate headquarters building will continue to be managed by professional property management firms.

- This budget includes funding for 273 full-time employees. This is an increase from the 244 authorized in FY 2006 and individual changes reflect AHA's commitment to the Quality of Living Initiative and other objectives identified in the implementation plan. AHA's corporate and employee share of benefits will increase by an estimated 10% each when the policies renew in January 2007. This budget provides for that increase.

- In order to leverage and augment its staff, AHA has entered into contractual relations with various contractors and consultants to provide additional staff with specialized expertise, technical assistance and program management services for various projects and programs. These contractors assist AHA with scheduling milestones and deadlines; coordination of interdepartmental communication; strategic oversight and guidance to implement new AHA goals; disciplined implementation of policies and procedures; flexible, efficient and expert staffing to meet these objectives; and improved accountability, efficiency and effectiveness. These arrangements allow AHA to deploy staff resources to a broad range of projects with appropriate expertise and quickly increase or decrease staff to respond to the inevitable surges and downturns in meeting its diverse and complex goals, especially in a volatile Federal budget environment.

- Historical spending rates and knowledge of AHA administrative, asset management, and services were used to establish budgetary levels for all revenue and expense categories.

- Interest income is anticipated to be $2.4 million based on expected balances and an interest rate of 5.2%, consistent with the 90-day Treasury Bill rate. This income will be affected by changes in funding balances and changes in rates earned. However, AHA will seek alternative investments in Real Estate in an attempt to become more economically viable.

## Revenues

AHA receives revenues from a variety of sources for various purposes. These include, but are not limited to:

- Federal annual subsidies
- Federal multi-year grants
- Other government and private grants
- Resident and other rents
- Interest income
- Development and related fees
- Loan repayments

AHA recognizes the revenue from the annual subsidies throughout the year based upon HUD approved funding calculations, rents, interest, and other income are recognized when earned. Other revenue budgets presented in this budget are based upon anticipated earnings accordingly.

Multi-year grant awards differ from annual subsidies in that revenue is recognized when expenses are incurred. These grants operate on a reimbursement basis in contrast to annual subsidies which are based on a calculation. Therefore, grant award revenue is presented based upon anticipated expenditure levels rather than grant award levels.

# Funding Category Assumptions

NOTE: At the time of this printing, AHA had not yet completed the FY 2008 Budget Process. This narrative and the numbers contained herein are to be considered draft. The final budget will be submitted to the Board of Commissioners during the June 2007 Board meeting.

## Low Income Operating Subsidy

- AHA receives Low Income Operating Subsidy as part of its MTW Block Grant. In AHA's FY 2008, AHA estimates HUD will provide $30.0 million in Low Income Operating Subsidy spread across two HUD calendar year funding cycles.
    - HUD implemented a new Low Income Operating Subsidy funding methodology beginning in 2007. This new funding methodology introduced project (property) based calculations for determining HUD subsidy. AHA submitted the calculation of its Low income Operating Subsidy for HUD's FY 2007 (Calendar Year 2007) to HUD in September 2006. HUD is using this calculation as the basis for funding January through December 2007, which includes the first six months of AHA's Fiscal Year 2008. Based on this calculation and after adjusting for a HUD-imposed $2.9 million transitional funding reduction, AHA estimates that it will be eligible for $37.9 million in 2007 operating and utility subsidy before proration.
    - HUD has not yet finalized subsidy levels for 2007; but using HUD's current estimate of an 82.9% proration, AHA expects to receive approximately $31.4 million in low income operating subsidy for 2007, of which $15.7 million will be available for AHA's FY 2008.
- The second half of AHA's FY 2008 runs from January through June 2008 and will be funded under the next stage of the new methodology which will provide separate subsidy for each property. Calculation of this subsidy will not be submitted to HUD until September 2007 and will be based on property occupancy for AHA's FY 2007, adjusted for properties coming off line. At this time, HUD has published neither the monthly Property Allowance Levels (PEL) nor the proration factors for 2008. AHA does know, however, that HUD will not impose a transitional funding reduction in 2008. A rough estimate of total FY 2008 Operating subsidy is $28.6 million, with $14.3 million earned in AHA's FY 2008. AHA believes that its MTW Agreement will continue to allow for the flexible use of Low Income Operating, Housing Choice, and Capital Funds despite changes in how HUD manages these programs for agencies which are not part of the MTW program.
- AHA expects to receive $ 12.7 million in resident rental income and $1.2 in other property related income.
- The projected number of Public Housing Assisted units of 7,629 used in the 2007 Low Income Operating Subsidy funding calculation submitted to HUD was derived from estimating the number of units eligible for subsidy in 2007.
- Utility revenues were budgeted based upon a three-year average rate of consumption times the utility rate

at the time of submission of subsidy calculations to HUD. Utility expenditures were budgeted based upon a three-year average rate of consumption times estimated utility rates.

- The minimum rent will continue at $125 per month. No changes in FY 2008 rent structures are anticipated in this budget.

- Assisted residents in mixed-income communities generally earn higher incomes. As a result, rents paid by these residents are higher than at conventional public housing communities. Such higher rents, however, are not available as a revenue source for AHA's operations because AHA does not own or control these properties. Instead, these rents go to support the operations of the mixed-income property at which they are generated. Therefore, residential rental income from mixed-income properties is not included as revenue in the tables at the back of this Budget Book.

- Mixed-income communities are budgeted using an agreed upon 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 rental income from the AHA-assisted units and the pro rata share of eligible expenses for the AHA-assisted units within each community on a break-even basis. The average subsidy for FY 2008 is forecasted to be $157.59 per unit per month for these communities.

- The Private Management Companies (PMCOs), which manage AHA-owned conventional public housing communities, developed initial property budgets based on AHA's objectives and goals. Initial guidance was that total property budgets could not exceed the approved FY 2006 budget levels. Adjustments to these budgets were made by AHA staff to ensure the safety and security of our residents and the continued viability of our properties.

- Property expense levels for our conventional public housing properties are budgeted using the following guidelines:

  - Objectives and performance goals of AHA, as owner.

  - Salaries are based on 1 administrative staff position per 100 units and 1 maintenance staff position per 50 units.

  - Management fees are subject to adjustments based on collections.

  - Staff training is estimated at 1% of total staff salaries.

  - Maintenance contracts and materials are computed using historic costs and/or actual contract costs for each property.

  - Resident services contract costs and training is calculated at $25 per unit per year.

- Employee taxes and benefits are based on historical costs.
- Administrative costs include CATALYST standards for enhanced criminal history and credit history checks.
- Certain exceptions were permitted to accommodate property size (acreage and units), density, property age and location.

- AHA provides funds to PMCOs to subsidize property expenses that exceed resident rents and other property-generated income.
- During FY 2008, AHA will complete relocation of residents from the University Homes as part of revitalization of that community. Relocation expenses for University Homes are funded under the Grady HOPE VI revitalization grant or Replacement Housing Factor Grants.
- In addition to the University AHA is implementing plans for the relocation in FY 2008 of tenants from Leila Valley, Jonesboro North and South, U-Rescue Villas, Englewood Manor, Palmer House, Bowen Homes, and Thomasville Heights as part of AHA's Quality Living Initiative (QLI). Relocation and demolition expenses for these communities will be funded using MTW funds.

### Housing Choice

- AHA receives a portion of its Housing Choice Subsidy as part of its MTW Block Grant; the balance is received outside of the block grant. AHA estimates it will receive approximately $135 million in total Housing Choice funding for FY 2008 supporting over 14,567 vouchers currently allocated. AHA anticipates receiving additional funds relating to AHA's QLI program, but these revenues are not included in the FY 2008 budget because the timing of HUD's approval of AHA's voucher requests is not known at this time. .
- Although AHA operates on a Fiscal Year budget that begins on July 1 each year, HUD began funding Housing Choice on a calendar year basis effective January 1, 2005.
- AHA estimates that it will receive $129.5 million in Housing Choice Voucher funding in the MTW Block Grant. This figure represents total MTW voucher funding, effectively including both Housing Assistance Payments (HAP) and administrative fees.
- This funding was calculated using the methodology outlined in Appendix A of the AHA Moving to Work agreement. Because HUD now funds on a calendar year basis, a separate calculation was used for the first and the last six months of AHA's Fiscal Year. The first six months (July – December 2007) reflect MTW Voucher funding rates identified by HUD for 2007 including an 88.7% proration and with no inflation adjustment. The last six months were estimated using the 2007 MTW Per Unit Cost (MTWPUC) formula and assumes a no inflation adjustment and the same level of proration.
- Special Purpose Vouchers, which are not eligible for the single funding flexibility under MTW, are calculated

using HUD's standard formulas for 6,300 voucher unit months.

- Based on voucher increments currently approved by HUD AHA estimates FY 2008 Special Purpose Voucher non-MTW funding after proration to be $4.8 million in FY06 including HAP and administration fees.

- The FY 2008 Housing Choice budget is also based upon the following assumptions.

  - AHA will continue to pay HAP to all current voucher holders that remain qualified.

  - AHA plans to continue the strategic use of project-based Housing Choice vouchers to support AHA's revitalization efforts and to increase the supply and quality of housing available for low-income, very low-income and extremely low-income families. Relocation vouchers will continue to be issued and HAP expenses incurred in support of the AHA's QLI Program Additional vouchers will also be issued in FY 2008 to support AHA's project-based tenant vouchers program.

  - The minimum rent for Housing Choice vouchers is $125 per month.

  - When establishing Housing Choice Payment Standards, AHA will use up to 110% of the published 40$^{th}$ percentile Fair Market Rent (FMR) in the Atlanta metropolitan area to aid income eligible families in facilitating a broader range of housing opportunities in lesser impacted neighborhoods.

  - Under the FY 2007 Implementation Plan, AHA is finalizing a study to develop and implement locally-determined FMRs for Atlanta as opposed to those currently defined by HUD. This will allow AHA to better negotiate with landlords when determining rents for Housing Choice subsidized housing. The impact of the localized FMRs is not expected to substantially change HAP expenses in FY 2008.

  - AHA projects that up to 30% of its FY 2008 vouchers will be portability vouchers. These vouchers provide rental subsidy to residents who move from Atlanta and are residing under the jurisdiction of other housing authorities (receiving authorities). HAP for these vouchers is established by receiving authorities based on their payment standards. AHA reimburses these housing authorities for the HAP payments and pays them 80% of the administrative fee that AHA receives for the vouchers. This budget uses the current average HAP cost for all vouchers, including portability vouchers. But because AHA cannot control the HAP for these portability vouchers, the potential for increased HAP expenses exist.

**Capital Funds**

HUD provides AHA with capital funds as part of its MTW block grant. AHA estimates its Federal Fiscal Year 2007 Capital

Funding Program (CFP) grant award will be about $12.3 million after HUD completes the 2007 funding calculation.

In addition to expending $12.3 million of the most recent CFP grant, AHA will use the remaining balances from prior year CFP grants for expenditures in FY 2008 for projects approved and begun in FY 2007. The amount of this carryover into FY 2008 is not known at this time and is not included in the FY 2008 Multifund budget.

### HOPE VI, Replacement Housing Factor Funds, and Development Grant Awards

HOPE VI, Replacement Housing Factor, and Development Grant funds are provided by HUD on a reimbursement basis for expenditures related to the revitalization of AHA communities. In addition AHA receives funds from the City of Atlanta for public improvements. In FY 2008 AHA anticipates reimbursements totaling over $83.9 million for HOPE VI, Replacement Housing Factor, Development Grant funds, and City of Atlanta funding.

### 11B New Construction and Substantial Rehabilitation Program

Through FY 2007, HUD provided AHA with housing assistance payments (HAP) and administrative fees for the support of 690 project-based Section 8 apartments in eight Atlanta communities owned by independent third parties. Effective with July 1, 2008, administration of these properties will be performed by Georgia HAP, Inc. and AHA will no longer be directly responsible for these properties.

### Mark to Market

Congress extended the Mark to Market program until September 30, 2011. AHA is the designated Participating Administrative Entity for Georgia and will continue to earn fees based on the number of asset restructuring assignments approved by HUD's Office of Affordable Housing Preservation. To date AHA has restructured 23 multifamily assets. Fees earned under this business line are unrestricted.

### Georgia HAP

AHA projects that it will remain responsible for administering approximately 7,400 HUD's projected-based Section 8, FHA-insured apartments in 55 properties owned by independent third parties. AHA earns monthly base fees and quarterly incentive fees as a subcontractor to Georgia HAP Administrators for conducting performance based reviews based on the level to which the consortium performs in meeting its contract obligation. The distribution of year-end revenue in excess of expenses for Georgia and Illinois is approved by Georgia HAP Administrators Board of Directors at the end of each fiscal year on an equitable basis. Based on current workload projections, AHA anticipates earning $1.6 million in unrestricted administrative and incentive fees as a subcontractor of GAHAP.

**OTHER FUNDS**
In addition to the major funds described above, AHA includes the following programs and funds in the category other funds.

**Development Fees**
AHA earns development and transaction fees and interest income though its involvement in revitalization partnerships. As shown below, AHA estimates that it will earn $3.2 million in FY 2008. Of this amount, $289,813 represents contributions to contractually required reserves for our mixed income properties. Although earned in FY 2008, some portion of the payments will be deferred until certain milestone dates in accordance with the specific financial closing documents.

The balance of $3.0 million is restricted to use in future redevelopment efforts, some specifically designated for the area in which it was earned.

**Turnkey III Homebuyers Program**
Based on a HUD-approved plan, AHA is currently engaged in the close-out of the Turnkey III Homebuyers Program and anticipates that all close-out activities will be completed during Fiscal Year 2008. The amounts to be included in the Turnkey III FY 2008 budget are contingent upon the completion of work done in FY 2007. All funds needed for closeout activities will be drawn from Turnkey III Homebuyers Program Operating Reserves, as will the funds that will establish a trust fund for the remaining properties. A separate budget will be sent to HUD prior to July 1, 2007.

## Operating Budgets

**Appendices E and F** provide the line item operating budgets for AHA Staff Headquarters and AHA owned assisted properties. The AHA Staff Headquarters budgets identify the operating budgets for the departments and do not attempt to allocate any related revenues to these departments. Staff budgets do not include HOPE VI or development funds with the exceptions of the Government and External Affairs Department and the Relocation Department. The former includes grant funds for case management related to AHA's revitalization effort, and the latter includes funds for relocations related to these activities

The operating budgets for AHA owned assisted properties include all operating expenditures, revenues generated at the property, and HUD operating subsidy generated by the property. They also include an allocation of CFP funds used for property operations based on a per unit allocation. These budgets do not include any allocation of costs from the headquarters operations that provide support and guidance.

**Reserve Balance and Projected Adequacy of Reserves**

| | |
|---|---|
| **Estimated MTW Working Capital, June 30, 2007** | **$30.0 million** |
| Impact of FY 2008 Operations | (2.1 million) |
| Estimated Working Capital June 30, 2008 | **$27.9 million** |

The working capital balances estimated for Moving to Work are sufficient to support operations in FY2008.

The Housing Authority of the City of Atlanta, Georgia

## COMBINED STATEMENTS OF REVENUES, EXPENSES AND CHANGES IN NET ASSETS

Year ended June 30,

| | 2006 | 2005 |
|---|---|---|
| Operating revenues | | |
| Tenant dwelling revenue | $ 18,405,002 | $ 17,608,530 |
| Operating subsidies | 174,000,129 | 185,380,097 |
| Other revenue | 7,516,205 | 6,187,147 |
| | 199,921,336 | 209,175,774 |
| Operating expenses | | |
| Administrative | 34,113,054 | 36,436,848 |
| Housing assistance payments | 96,382,051 | 104,855,563 |
| Tenant services | 5,445,229 | 6,732,464 |
| Utilities | 15,675,579 | 16,572,186 |
| Ordinary maintenance and operation | 14,947,511 | 14,271,361 |
| Protective services | 5,589,844 | 6,823,744 |
| General expenses | 11,013,021 | 9,715,232 |
| Total operating expense before depreciation | 183,166,289 | 195,407,398 |
| Net operating income before depreciation | 16,755,047 | 13,768,376 |
| Depreciation & amortization expense | 13,906,235 | 15,750,949 |
| Net operating income (loss) | 2,848,812 | (1,982,573) |
| Non-operating revenue/(expense) | | |
| Interest & investment income | 6,197,582 | 2,089,429 |
| Gain on sale of capital assets | 1,179,361 | 2,441,081 |
| Loss on capital asset write-down | (632,200) | (11,880,879) |
| Extraordinary maintenance and demolition | (5,937,887) | (1,794,960) |
| Interest expense | (900,851) | (741,761) |
| Net non-operating revenue/(expense) | (93,995) | (9,887,090) |
| Capital grants | 21,686,827 | 21,544,746 |
| Change in net assets | $ 24,441,644 | $ 9,675,083 |

## 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 four priorities for capital expenditures: (1) the health and safety of our residents, (2) security, (3) sustaining the viability of AHA-owned properties until repositioned and (4) compliance with accessibility requirements established in the Voluntary Compliance Agreement (VCA) between AHA and HUD's Fair Housing and Equal Opportunity office. The FY 2008 Capital Budget reflects this prioritization. As additional needs are identified, if the Quality of Life Initiative (QLI) timeline changes, or in response to emergencies, AHA may adjust its 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 2008. Finally, some expenditures may take place in FY 2008 resulting from projects planned for and begun in FY 2007, but completed and paid for in FY 2008.

## Planned Expenditures

| Capital Projects in FY 2008 | FY 2008 Budget | Property |
|---|---|---|
| Major Systems Issues such as elevator modernization, PTACS, boilers, electrical panels, sprinkler systems, plumbing and storage tanks. | **$1,490,907** | Bankhead Courts<br>Barge Road<br>Cheshire Bridge<br>Cosby Spear<br>East Lake<br>Georgia Avenue<br>Herndon Homes<br>Hightower Manor<br>Hollywood Courts<br>Juniper & 10th<br>Marian Road<br>Marietta Road<br>Peachtree Road<br>Piedmont Road<br>Zell Miller Community Center |
| Infrastructure Repairs including sewers, drains, driveways and parking lots, retention ponds and severe erosion. | **$320,380** | Cheshire Bridge<br>Cosby Spear<br>East Lake<br>Georgia Ave<br>Peachtree Road<br>Piedmont Road<br>Roosevelt House<br>Westminster<br>Zell Miller Community Center |
| Building Envelope Repairs including windows, painting, roof replacement, sealing, structural repairs, and lighting. | **$1,359,560** | Bankhead Courts<br>Barge Road<br>Cheshire Bridge<br>Cosby Spear<br>East Lake<br>Georgia Avenue<br>Herndon Homes<br>Hightower Manor<br>Hollywood Courts<br>Juniper & 10th<br>Marian Road<br>Peachtree Road<br>Piedmont Road<br>Zell Miller Community Center |

| Capital Projects in FY 2008 | FY 2008 Budget | Property |
|---|---|---|
| Various Dwelling Unit and Common Area Repairs including cabinet replacement, kitchen & bathroom fixtures and floors, closet doors, trash shoots, and structural repairs | **$1,909,082** | Barge Road<br>Cheshire Bridge<br>Cosby Spear<br>East Lake<br>Georgia Avenue<br>Hightower Manor<br>Juniper & 10th<br>Marian Road<br>Marietta Road<br>Martin Street Plaza<br>Palmer House<br>Peachtree Road<br>Piedmont Road<br>Roosevelt House<br>Thomasville Heights<br>Westminster<br>Zell Miller Community Center |
| Improvements related to accessibility (ADA) | **$2,010,553** | Barge Road<br>Cheshire Bridge<br>Cosby Spear<br>East Lake<br>Georgia Avenue<br>Hightower Manor<br>Juniper & 10th<br>Marian Road<br>Marietta Road<br>Martin Street Plaza<br>Peachtree Road<br>Piedmont Road<br>Westminster<br>Zell Miller Community Center |
| Upgrade units to UFAS to meet VCA requirements | **$1,600,000** | Barge Road<br>Cheshire Bridge<br>Cosby Spear<br>East Lake<br>Georgia Avenue<br>Hightower Manor<br>Juniper & 10th<br>Marian Road<br>Marietta Road<br>Peachtree Road<br>Piedmont Road |
| **Total FY 2008 Capital Projects Budget** | **$8,690,482** | |

**Note:** There are two elevator upgrades planned for FY 2008. Due to the design, manufacture and installation timelines, these projects will possibly overlap into FY 2009. Other projects, based on unforeseen circumstances, may also extend into FY 2009.

## Demolition and Disposition Activities

AHA's FY 2008 demolition and disposition activities are described in detail in Parts I and V of the FY 2008 Implementation Plan.

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

Adopted by the Board of Commissioners
June 16, 2004

*Revision 3*

Amended by the Board of Commissioners
April 25, 2007

**The Housing Authority of the City of Atlanta, Georgia**

*Statement of Corporate Policies Governing the Leasing and Residency of Assisted Apartments*
*Revision 3* [1]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[1] The *Statement of Corporate Policies Governing the Leasing and Residency of Assisted Apartments* (Statement of Corporate Policies) was adopted by the Board of Commissioners on June 16, 2004. A Revision 1 publication of this policy document was based on amendments adopted by the Board of Commissioners on April 25, 2005. A Revision 2 publication was based on amendments adopted by the Board of Commissioners on September 9, 2005 and December 12, 2005. The current Revision 3 is based on amendments adopted by the Board of Commissioners on April 25, 2007.

# The Housing Authority of the City of Atlanta, Georgia

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

### *PREAMBLE*

This *Statement of Corporate Policies Governing the Leasing and Residency of Assisted Apartments* ("Statement of Corporate Policies") is the policy document that governs the leasing and residency of public housing-assisted apartments owned, affiliated, or sponsored by The Housing Authority of the City of Atlanta, Georgia ("Atlanta Housing Authority"). The Statement of Corporate Policies is organized around Atlanta Housing Authority's guiding principles and its corporate vision, Healthy Mixed-Income Communities.

For purposes of the Statement of Corporate Policies, any apartment that receives public housing operating subsidy, regardless of the ownership structure of the community in which the apartment is located, is referred to as an "Assisted Apartment." Atlanta Housing Authority-owned public housing developments with Assisted Apartments are referred to as "Affordable Communities." Privately-owned market rate, mixed income communities with a percentage of Assisted Apartments are referred to as "Signature Communities" or "Mixed-Income, Mixed-Finance Communities." These communities are owned by a limited partnership or similar ownership structure ("Owner Entity"); are sponsored and/or developed, in part, by Atlanta Housing Authority, who may or may not have a ground lease on the real estate; and are independently operated by the Owner Entity's managing general partner and professional management company.

Atlanta Housing Authority and the U.S. Department of Housing and Urban Development (HUD) entered into a Moving to Work Demonstration Program Agreement under which Atlanta Housing Authority is designated as a Moving to Work agency. As a Moving to Work agency, Atlanta Housing Authority's Statement of Corporate Policies outlines policies that support the creative design and implementation of initiatives designed to enhance the quality of life of residents, promote resident economic and lifestyle independence, and foster the development of excellent, mixed-income communities.

The Statement of Corporate Policies was adopted by Atlanta Housing Authority's Board of Commissioners on June 16, 2004. Two revisions of the Statement of Corporate Policies have been approved subsequent to the original date of adoption. This is the third revision of these policies.

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

## PART I- INTRODUCTION

ARTICLE ONE. OBJECTIVE

The Statement of Corporate Policies is Atlanta Housing Authority's policy document for the leasing and occupancy of Assisted Apartments in support of Atlanta Housing Authority's Vision of Healthy Mixed-Income Communities.

ARTICLE TWO MANAGEMENT AND ADMINISTRATION

1. The Real Estate Management Division is responsible for developing and implementing written operating procedures for the Affordable Communities that are consistent with the Statement of Corporate Policies.
2. Owner Entities and their professional private-sector management companies are responsible for developing and implementing written operating procedures for the Signature Communities that are consistent with the Statement of Corporate Policies and to the requirements of other funding sources to the extent that Signature Communities may be subject to stricter requirements. Such operating procedures are subject to review by Atlanta Housing Authority in coordination with the oversight procedures of other funding sources in order to ensure consistency with the intent of all policies and requirements.
3. For the purposes of the Statement of Corporate Policies the written operating procedures under Sections 1 and 2 above are referred to as Management Operating Procedures.
4. For the purposes of the Statement of Corporate Policies, Atlanta Housing Authority and Owner Entity private management companies, collectively or individually, as appropriate, will be referred to as "Management Agent.")

ARTICLE THREE MOVING TO WORK ANNUAL PLAN

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

2. While recognizing that implementation of various policy initiatives may be immediate, progressive, or refined through various demonstration programs, specific implementation strategies for any given year, which are not included in the Statement of Corporate Policies, may be enumerated in Atlanta Housing Authority's Moving to Work Annual Plan ("MTW Annual Plan").

## ARTICLE FOUR. APPLICABILITY OF POLICIES TO APPLICANTS AND RESIDENTS

The Statement of Corporate Policies applies to all Applicants, Residents, and members of Applicant and Resident households, including the heads of household, with respect to their compliance with all policies related to their application for and residency of an Assisted Apartment. The singular use of the terms "Resident" and "Applicant" shall be deemed to include all household members for the purposes of this Statement of Corporate Policies.

## ARTICLE FIVE. SITE-BASED WAITING LIST POLICY

The Site-Based Waiting List Policy established the equitable and consistent administration of independent site-based waiting lists at each AHA-owned Affordable Community and each Signature Community. This policy provides for the fair and equitable selection of eligible and qualified Applicants from a community waiting list rather than from a centralized pool. Although an Applicant can only lease one Assisted Apartment, Applicants have the freedom to submit applications to the site-based waiting list of the community or communities of their choice, provided the site-based waiting list is open and receiving applications.

HUD's Assistant Secretary of Fair Housing and Equal Opportunity approved Atlanta Housing Authority's Site-Based Waiting List Policy for the Olympic Legacy Program by letter dated June 28, 1996. The Mixed-Income, Mixed-Finance Community Site-Based Waiting List Policy Addendum to the Olympic Legacy Program was approved on June 25, 1999. The Affordable Housing Community Site-Based Waiting List Policy was adopted by Atlanta Housing Authority's Board of Commissioners on January 30, 2002. The implementing protocols for the Site-Based Waiting List Policy are memorialized as separate policy documents and are hereby included, by reference, in this Statement of Corporate Polices.

ARTICLE SIX. FAIR HOUSING AND EQUAL OPPORTUNITY

1. Atlanta Housing Authority supports all applicable Federal and State nondiscrimination and fair housing laws and applicable HUD regulations in all housing and program activities. Atlanta Housing Authority monitors fair housing and equal opportunity compliance at all of the communities governed by this Statement of Corporate Policies.
2. Atlanta Housing Authority acknowledges the protections afforded victims under the *Violence Against Women Act*, and has included administrative measures to address those protections in its Management Operating Procedures, as applicable.
3. Atlanta Housing Authority acknowledges the importance of serving Limited English Proficiency (LEP) persons. The extent to which it is determined that a significant number or proportion of the population residing in an Affordable Community is comprised of LEP persons, Atlanta Housing Authority will develop and implement a LEP Plan to address the needs of such persons, as appropriate and in consideration of the cost and availability of resources that would be needed to provide translation services to LEP persons.

ARTICLE SEVEN. REASONABLE ACCOMMODATION

1. Atlanta Housing Authority shall assist persons with disabilities who are Applicants, Residents, employees and visitors to Atlanta Housing Authority offices and communities to participate in programs on the same basis as persons who do not have such disabilities. Atlanta Housing Authority will make reasonable and necessary accommodations for persons with disabilities so that each such person may participate in a meaningful manner, and benefit from, all Atlanta Housing Authority-sponsored programs and activities. These reasonable accommodations shall extend to Atlanta Housing Authority's applications procedures, program participation and facilities enhancement activities.

2. Atlanta Housing Authority will implement, to the extent reasonably feasible, an enhanced level of visitability pursuant to the Visitability Ordinance enacted by the City of Atlanta.

3. Atlanta Housing Authority and Owner Entities through their respective Management Agents shall (i) set forth a process for Applicants, Residents and members of the public who participate in programs in Affordable Communities and/or Signature Communities to request reasonable accommodations; (ii) provide forms for individuals to request reasonable accommodation(s); (iii) set forth specific procedures regarding the acceptance, processing and disposition of reasonable accommodation request(s), including timeframes; and (iv) provide formal appeal/grievance procedures for individuals who have been denied reasonable accommodation(s).

4. As a component of Atlanta Housing Authority's reasonable accommodation efforts, Atlanta Housing Authority will advise Applicants, Residents, employees and members of the public of the right to effective communication in programs, services and activities. Management Operating Procedures will ensure that:

   A. Interested persons, including persons with hearing, visual or cognitive disabilities, can obtain information concerning the existence and location of accessible services, activities, and facilities;

   B. Atlanta Housing Authority, Owner Entities, or Management Agents shall furnish appropriate auxiliary aids and services, where necessary, to afford a person with disabilities an equal opportunity to participate in programs, services and activities. In determining what auxiliary aids are necessary, Atlanta Housing Authority, Owner Entities, or Management Agents shall give primary consideration to the requests of the person with disabilities unless doing so would result in a fundamental alteration of programs or activities, or an undue financial and administrative burden; and

   C. Residents and Applicants are aware of alternative, non-written methods to request a reasonable accommodation and the availability of forms and information in alternative formats.

<u>ARTICLE EIGHT.</u> DECONCENTRATION OF POVERTY

1. In order to realize its corporate vision of Healthy Mixed-Income Communities, Atlanta Housing Authority is pledged to outcomes that lead to the deconcentration of poverty in the management of its Affordable Communities and the creation of market rate, mixed income communities.

2. Atlanta Housing Authority's fair and equitable Site-Based Waiting List Policy for Assisted Apartments at each Affordable and Signature Community strengthens the concepts of community building and housing choice. Based on available housing opportunities, Applicants choose communities according to location, amenities, job opportunities, schools, and neighborhoods. The result is a policy approach that supports the deconcentration of poverty.

3. Under Moving to Work, Atlanta Housing Authority has the authority to pursue locally driven policies, procedures and programs with the aim of developing better, more efficient and effective ways of providing quality, mixed-income housing to low income families

4. Atlanta Housing Authority will also continue to reposition its portfolio of distressed and obsolete public housing developments through a variety of strategies, foremost of which is the transformation of its conventional public housing developments into market-rate, mixed-income communities, each with a seamless affordable component and households having a range of incomes and diverse backgrounds.

ARTICLE NINE. FRAUD AND MISREPRESENTATION

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

2. 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.

3. Any Applicant or Resident who has made any intentional 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.

4. Applicants who are denied admission due to intentional misrepresentation of his/her criminal history shall have the right to an informal review as set forth in the Statement of Corporate Policies.

ARTICLE TEN. PRIVATE SECTOR INNOVATION

In order to take advantage of private sector innovation, Atlanta Housing Authority may make available to the Owner Entities of Signature Communities the least restrictive regulatory requirements to achieve goals in accordance with the MTW Annual Plan. Owner Entities may engage in innovative activities in developing and implementing management practices and streamlined processes; higher community standards; and quality of life initiatives in order to create quality living environments.

1. Owner Entities are authorized, subject to the approval of the Atlanta Housing Authority, to create, adopt and implement their own occupancy, leasing and rent policies for public housing-assisted Residents and eligible Applicants with respect to their communities.

2. Innovative policies and procedures could include, but are not limited to, new rent structures such as affordable fixed rents; standard deductions; application and waiting list procedures; eligibility and/or suitability criteria; meaningful economic independence milestones; and term limits.

3. Such innovative policies and procedures, once approved by Atlanta Housing Authority, will supplement and will not be considered in conflict with this Statement of Corporate Policies and Atlanta Housing Authority's requirements for Assisted Apartments.

## PART II – APPLICANT AND RESIDENT SUITABILITY

ARTICLE ONE. DEFINITIONS OF FAMILY

1. A Family is defined as two or more persons who may or may not be related that are residing together in the same household.

2. An Elderly Family is defined as a Family in which the head-of-household, spouse, or sole adult member of the household is age 62 or older.

3. A Disabled Family is defined as a Family in which the head-of-household, spouse, or sole adult member of the household is a person with a verifiable disability.

4. Any member of an Elderly Family or Disabled Family, other than an approved live-in-aide, must be in compliance with the qualifications outlined in Article Two of this Part II.

ARTICLE TWO. DETERMINING CRITERIA

1. An Applicant desiring to lease an Assisted Apartment must first demonstrate that (a) Applicant meets one of the definitions of Family and is an eligible low income household based on total annual household income pursuant to and verified according to U. S. Department of Housing and Urban Development (HUD) rules and regulations and as provided in Atlanta Housing Authority's MTW Annual Plan; (b) Applicant satisfies HUD's statutory and regulatory requirements for citizenship/eligible immigrant status; (c) each school-age member of the Applicant's household who is under 18 years of age and who has not completed her/his secondary education may be required to enroll and attend an accredited public or private secondary academic or technical school (d) provided the Applicant household is not an Elderly Family or a Disabled Family as defined in Article One of this Part II, at least one adult member of the Applicant household, 18 years of age or older, is either legally and gainfully employed on a full-time basis for at least 30 hours per week or legally and gainfully self-employed in a legitimate business enterprise, appropriately documented, for at least 30 hours per week as defined by the Management Operating Procedures; (e) each other member of the Applicant's household, 18 years of age and older, is either (1) legally and gainfully employed or self-employed (as described above) on a full-time basis for at least 30 hours per week; (2) a full-time student at an Atlanta Housing Authority recognized school or institution; (3) employed (but not self-employed) on a part-time basis and either attending an Atlanta Housing Authority recognized school or institution on a part-time basis or participating in an Atlanta Housing Authority-approved training program for a combined minimum total of 30 hours per week for employment and education/training; (4) elderly; or (5) disabled; and (f) Applicant would be a suitable Resident based on past satisfactory behavior including, but not limited to, housekeeping performance, acceptable payment records for rent and/or utilities (as applicable), acceptable credit history, acceptable criminal background record, 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, but not limited to, housekeeping performance, good payment records for rent, other charges and utilities, satisfactory record of lease compliance, and an acceptable criminal background record.

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, but not limited to, those which require the ability to exit the building in the event of an emergency and such other related certifications as deemed appropriate by Atlanta Housing Authority, without 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 THREE. 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 Management Operating Procedures.

2. An Applicant who applies will be placed on the applicable site-based waiting list for the community or communities in accordance with the Applicant Selection Policies.

3. Certain communities with Assisted Apartments may require Applicants to pay an appropriate non-refundable leasing fee, which may be applied to the Applicant's security deposit, provided the Applicant is offered and accepts the offer of an Assisted Apartment.

4. Applicants will provide all information on all household members requested in the application for admission on the form in use by the Management Agent. The application will give persons with disabilities the opportunity to (i) specify whether they need a unit with accessible features and describe the necessary accessibility features they require; (ii) specify if they require reasonable accommodation(s) in their housing and/or during the application process; and (iii) request a copy of Atlanta Housing Authority's Reasonable Accommodation Policy.

5. Application information for Applicants will include the name and contact information of the Management Agent for each community, and the name and contact information of Atlanta Housing Authority's Section 504/ADA Coordinator, including the TDD/TTY number or Georgia Relay Service telephone number.

## ARTICLE FOUR. APPLICANT SELECTION POLICIES

Applicants for Assisted Apartments, whether located in Affordable Communities or Signature Communities, will be placed on the applicable site-based waiting list in accordance with the requirements as set forth in this Article Four.

1. Order of Applicant Selection for Communities where the Resident Population is comprised of Elderly, Almost-Elderly and/or Young Disabled Residents:

   A. To be considered for a Community for Elderly, Almost-Elderly and/or Young Disabled Residents, an Applicant must be a household whose head or spouse (if married) or sole member is:

      (i) Elderly (62 years of age and older);
      (ii) Almost Elderly (55-61 years of age); or
      (iii) Young Disabled (a person less than 55 years of age with a disability).

      Applicants who do not qualify as outlined above are not eligible for admission.

   B. Atlanta Housing Authority pursuant to its MTW Annual Plan will strive to achieve an optimal balance of Elderly, Almost Elderly, and Young Disabled Residents in senior communities that do not have a designation pursuant to paragraph C of this Section. The Management Agents of such communities shall be permitted to admit applicants from the waiting list at a ratio of <u>*four (4) Elderly and Almost Elderly Applicants to one (1) Young Disabled Applicant*</u> in order to achieve the optimal balance.

   C. Atlanta Housing Authority in accordance with its Moving to Work Annual Plan may designate up to 100% of the Assisted Apartments in a community for Elderly, Almost Elderly, or Young Disabled Residents, as applicable and appropriate.

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, in its sole discretion, exercise its authority to permit Elderly and/or Almost Elderly Applicants on the Housing Choice Program waiting list to be selected for screening and admission, if approved, to a senior community with Assisted Apartments.

E. To the extent that either a current Resident or eligible Applicant requires the accessibility features of an available Uniform Federal Accessibility Standards Unit ("UFAS-Accessible Unit"), the requirements in Article Five of this Part II will take precedence in the order of selection.

2. Order of Applicant Selection for a Community.

A. The order of selection of an Applicant from a site-based waiting list in a community with Assisted Apartments will be according to the ranking of the Applicant's application by either date-and-time of application or lottery, as applicable. To the extent that either a current Resident or eligible Applicant requires the accessibility features of an available Uniform Federal Accessibility Standards Unit ("UFAS-Accessible Unit"), the requirements in Article Five of this Part II will take precedence in the order of selection.

B. Provided the Applicant is <u>not</u> an Elderly Family or a Disabled Family as defined in Article One of this Part II, at least one adult member of the Applicant household, 18 years of age or older, must be either legally and gainfully employed on a full-time basis for at least 30 hours per week <u>or</u> legally and gainfully self-employed in a legitimate business enterprise, appropriately documented, for at least 30 hours per week as defined by the Management Operating Procedures; and all other members of the household must be either:

i. 18 to 61 years old and legally and gainfully employed or self-employed (as described above) on a full-time basis at least 30 hours per week;

ii. 18 to 61 and attending an Atlanta Housing Authority recognized school or institution as a full-time student;

iii. 18 to 61 years of age and engaged in a combination, totaling at least 30 hours per week, of legal employment (but not self employment), education (attending an Atlanta Housing Authority recognized school or institution) and/or participation in an Atlanta Housing Authority-approved training program ;

iv. Elderly; or

v. Disabled.

3. General Considerations for Applicant Selection from a Site-Based Waiting List.

A. To be eligible for selection, an Applicant's eligibility and qualifications must be verified through appropriate documentation as reasonably required by the Management Agent in the Management Operating Procedures.

B. An Applicant's placement on a site-based waiting list at an Affordable Community and/or Signature Community shall be based on either the date-and-time of application or a random method such as a lottery, as determined by the Management Agent in accordance with the Statement of Corporate Policies and the Management Operating Procedures. In either case, to the extent that either a current Resident or eligible Applicant requires the accessibility features of an available Uniform Federal Accessibility Standards Unit ("UFAS-Accessible Unit"), the requirements in Article Five of this Part II will take precedence in the order of selection.

C. The site-based waiting list will be opened following a public notice which will contain the following information:

i. Location of the Affordable or Signature Community where applications may be placed;
ii. Availability of Assisted Apartments by bedroom size;
iii. Explanation of basic eligibility criteria for Applicants; Special Qualifications, if any (e.g. work/program requirement);
iv. Method of Selecting Applications (date and time of application, or by a random method such as a lottery);
v. Fair Housing Logo or statement; and
vi. Accessibility Logo or statement.

D. If the public notice does not include the closing date of the site-base waiting list then a separate public notice must be published to announce the closing date of the site-based waiting list.

E. The Management Agent will ensure that the opening and/or closing of a site-based waiting list will be published in selected newspapers of general public circulation, including minority and foreign language newspapers (for persons with LEP) that may be available to potential Applicants in order to ensure fair and equitable marketing efforts. The selection of such newspapers will be in accordance with the Management Operating Procedures and/or Affirmative Fair Housing Marketing Plan, as applicable.

F. The method used in ranking Applicants on the site-based waiting list for an Assisted Apartment determines the organization of applicants on the site-based waiting list. Applicants ranked by date-and-time of application will be organized according to bedroom size eligibility whereby the application with the earliest date-and-time will be first. Applicants ranked by lottery will be organized according to bedroom size eligibility in sequential numerical order, first to last, of the random selection. In the case of the reoccupancy of a revitalized community, eligible returning residents of the former public housing project will be placed on the applicable site-based waiting list and given first consideration as Applicants for an Assisted Apartment prior to any consideration given to other Applicants who were placed on the applicable site-based waiting list according to a public notice.

G. The maintenance of a site-based waiting list with respect to updating applications, notice letters, and purges will be detailed in the Management Operating Procedures.

4. General Consideration for Mixed-Income, Mixed-Finance Communities

   A. At least five percent (5%) of all Assisted Apartments in Mixed-Income, Mixed-Finance Communities will be available to eligible and qualified Applicants and Residents with disabilities who require UFAS-Accessible Units, provided the Assisted Apartment unit count remains within the limits established by the governing legal and financial agreements should the percentage exceed five (5%).

B. While still subject to the requirements of the Low Income Housing Tax Credit program under Section 42 of the federal Internal Revenue Code, and in consideration of the expected income levels of residents of apartments other than Assisted Apartments being contemplated by Owner Entities of Mixed Income Mixed Finance communities with Assisted Apartments, such Owner Entities are hereby permitted to manage admissions to an appropriate goal of a broad range of incomes whereby fifty percent (50%) of Assisted Apartments would be occupied by Resident families with incomes less than thirty percent (30%) of area Median Income for the Atlanta, Georgia MSA (adjusted for family size) and fifty percent (50%) by Resident families with incomes equal to or greater than thirty percent (30%) Median Income for the Atlanta, Georgia MSA (adjusted for family size).

<u>ARTICLE FIVE.</u> ORDER OF SELECTION FOR UFAS-ACCESSIBLE UNITS

1. Atlanta Housing Authority identifies and prioritizes the needs of eligible Residents and Applicants who require the accessibility features of a UFAS-Accessible Unit in a centralized database according to the date and time of a Resident's transfer request, or the date and time or ranking by lottery, as applicable, of an Applicant's application. This database ("UFAS-Accessible Unit Database") maintains data on such Residents and Applicants for both the Affordable Communities and Signature Communities.

2. Each Affordable Community and each Signature Community will maintain a separate, site-based UFAS-Accessible Unit Waiting List ("UFAS Waiting List") for eligible Applicants and Residents with disabilities who require UFAS-Accessible Units.

3. The UFAS-Accessible Unit Database is established to provide:

   A. Direct assistance to Residents and Applicants with disabilities, upon request, in the application for an available UFAS-Accessible Unit in any Affordable Community or Signature Community;

   B. A process for notifying and referring residents from the database to the Affordable Communities and Signature Communities with openings on the respective site-based UFAS Waiting Lists;

C. A process for notifying and referring Applicants from the database to the Affordable Communities and Signature Communities with openings on the respective site-based UFAS Waiting Lists; and

D. A method for monitoring the maximization of occupancy of Assisted Apartments that are UFAS-Accessible Units, in Affordable Communities and Signature Communities, by Residents who require the accessibility features of those units.

4. When a UFAS-Accessible Unit becomes available in the appropriate bedroom size in an Affordable Community, the Management Agent shall offer the UFAS-Accessible Unit as follows:

   A. First, to a current Resident with disabilities in an Affordable Community who is being relocated due to Atlanta Housing Authority revitalization activities and who requires the accessibility features of the available UFAS-Accessible Unit;

   B. Second, to a current Resident with disabilities in the same Affordable Community who requires the accessibility features of the available UFAS-Accessible Unit and is occupying a unit without those features;

   C. Third, if there is no current Resident in the same Affordable Community who requires the accessibility features of the available UFAS-Accessible Unit and wishes to reside in that unit, then it will be offered to an eligible, qualified current Resident with disabilities, according to date and time of transfer request, residing in another Affordable Community, who requires the accessibility features of the available, UFAS-Accessible Unit and is occupying a unit without these features;

   D. Fourth, if there is no current Resident in any Affordable Community who requires the accessibility features of the vacant, UFAS-Accessible Unit and wishes to reside in that unit, then it will be offered to an eligible, qualified current Applicant with disabilities, according to date and time of application on the site-based waiting list of the same Affordable Community who requires the accessibility features of the available UFAS-Accessible Unit;

E. Fifth, if there is no qualified Applicant on the site-based waiting list of the same Affordable Community who requires the accessibility features of the vacant, UFAS-Accessible Unit, then it will be offered to an eligible, qualified Applicant with disabilities, according to date and time of application, on the site-based waiting list of another Affordable Community who requires the accessibility features of the available, UFAS-Accessible Unit; and

F. Sixth, if there is not an eligible, qualified Resident or Applicant with disabilities in the Affordable Communities who wishes to reside in the available, UFAS-Accessible Unit, then the unit may be offered to the next Applicant or Resident, according to the date and time of the transfer request or application, in the Affordable Community who does not need the accessible features of the unit. The occupying Resident will sign a lease or lease addendum that requires the Resident of any UFAS-Accessible Unit in an Affordable Community who does not need the accessibility features of that unit to relocate, at no expense to the Resident, to a vacant, non-accessible unit within thirty (30) days of notice by the Affordable Community when there is an eligible, qualified current Applicant or Resident with disabilities who requires the accessibility features of the unit.

5. When an Assisted Apartment that is a UFAS-Accessible Unit becomes available in the appropriate bedroom size in a Signature Community, the Management Agent shall offer the UFAS-Accessible Unit to Residents and/or Applicants, as follows:

   A. First, to a current Resident with disabilities in the same Signature Community who requires the accessibility features of the available, UFAS-Accessible unit and is occupying a unit without those features;

   B. Second, if there is no current Resident in the same Signature Community who requires the accessibility features of the vacant, UFAS-Accessible Unit and wishes to reside in that unit, then it will be offered to an eligible, qualified current Applicant for an Assisted Apartment, according to date and time of application, on the site-based waiting list of the same Signature Community who requires the accessibility features of the available, UFAS-Accessible Unit;

C. Third, if there is no qualified Applicant for an Assisted Apartment on the site-based waiting list of the same Signature Community who requires the accessibility features of the vacant UFAS-Accessible Unit, then the Signature Community will coordinate with Atlanta Housing Authority's Section 504/ADA Coordinator for referrals from the Affordable and Signature UFAS-Accessible Unit Database. If Atlanta Housing Authority identifies a current Resident or Applicant on the Affordable and Signature UFAS-Accessible Unit Database, Atlanta Housing Authority shall refer the Resident or Applicant, according to date and time of transfer request or application, to the Signature Community; and

D. Fourth, if there is no eligible, qualified Resident or Applicant with disabilities in the Signature Community or referred by Atlanta Housing Authority pursuant to a review of the Affordable and Signature UFAS-Accessible Unit Database, who wishes to reside in the available, UFAS-Accessible Unit, then the unit may be offered to the next Applicant or Resident, according to date and time of transfer request or application, in the Signature Community who does not need the accessible features of the unit. The occupying Resident will sign a lease or lease addendum that requires the Resident of any UFAS-Accessible Unit in a Signature Community who does not need the accessibility features of that unit to relocate, at no expense to the Resident, to a vacant, non-accessible unit within thirty (30) days of notice by the Signature Community when there is an eligible, qualified current Applicant or Resident with disabilities who requires the accessibility features of the unit.

## ARTICLE SIX. 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. The Management Agent shall be responsible for: (1) screening household members 16 years old and over; and (2) 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 Assisted Apartment. Residents shall undergo and complete the screening process annually, on an interim basis, or over some longer interval of time in accordance with the MTW Annual Plan.

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 execute authorization forms allowing the Management Agent to conduct any background check, examination, or verification required for appropriate determinations under the initial or periodic reexamination process. The period of the authorization will be established in the Management Operating Procedures.

5. Applicants and Residents are required to cooperate with the Management Agent during the screening process by providing truthful, complete information relating to all income, household composition, criminal history background, and all other household background information.

6. An Applicant with an unsatisfactory screening report will be denied and sent a suitability denial notice. A Resident household with an unsatisfactory screening report will be subject to termination or nonrenewal of the Resident household's Lease.

7. Applicants and Residents with unsatisfactory screening reports will be presented with a suitability denial notice, which will include 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). Applicants and Residents desiring to dispute such determinations, including those with adverse criminal history reports, may do so as set forth in the Statement of Corporate Policies, as applicable, based on the circumstances.

8. Atlanta Housing Authority and Management Agents may 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 SEVEN. CRIMINAL HISTORY SCREENING

Atlanta Housing Authority, Owner Entities, and/or Management Agents may deny admission to Applicants or terminate or not renew the leases of Residents if any of their household members are or have been engaged in criminal activity that could reasonably be expected to indicate a threat to the health, safety or welfare of other residents, Atlanta Housing Authority, Owner Entity, and/or Management Agent staff.

1. OFFENSES SPECIFICALLY IDENTIFIED BY HUD

   A. Pursuant to 24 CFR § 960.204, Applicants may be denied admission if any member of their households:

      i. Has been evicted from federally assisted housing for drug-related criminal activity within the three year period preceding application;

      ii. Is currently engaging in the illegal use of drugs;

      iii. Has ever been convicted of drug-related criminal activity for manufacture or production of methamphetamine on the premises of federally assisted housing;

      iv. Is subject to a lifetime registration requirement under a State sex offender registration program; or

      v. Is abusing or demonstrates a pattern of abuse of alcohol that may threaten the health, safety, or right to peaceful enjoyment of the premises by other residents.

   B. Residents will also be subject to termination if, subsequent to admission, Atlanta Housing Authority determines that any of the statements included in Paragraph A above were applicable to Resident households at the time of admission.

2. VIOLENT OR DRUG-RELATED OFFENSES

Applicants may be denied admission and Residents may be subject to termination of tenancy if any member of their households have been convicted of, arrested or under an outstanding warrant for, or reasonably believed to be engaged in any Violent or Drug-Related Offenses. Examples of Violent or Drug-Related Offenses include, but are not limited to, the following:

A. Homicide, Murder, Voluntary Manslaughter;

B. Rape, Sexual Battery, other Aggravated Sex-Related Crimes;

C. Child Molestation, Child Sexual Exploitation;

D. Drug Charges;

E. Kidnapping, False Imprisonment;

F. Terrorism;

G. Arson;

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

I. Assault and Battery (Simple and Aggravated);

J. Trafficking, Distribution, Manufacture, Sale, Use, or Possession of Illegal Firearms;

K. "Carjacking;"

L. Robbery;

M. Hate Crimes;

N. Criminal Damage to Property Endangering Life, Health and Safety;

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

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

3. OTHER CRIMINAL OFFENSES (Not Violent or Drug-related)

   Applicants may be denied admission and Residents may be subject to termination of tenancy if any member of their households have, within the five year period preceding application or at any time during tenancy, been convicted of, arrested or under an outstanding warrant for, or reasonably believed to be engaged in any other criminal offenses that do not involve violence or drugs. Examples of Other Criminal Offenses (not violent or drug-related) include, but are not limited to the following:

   A. 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. Motor Vehicle Theft;

   E. Burglary, Larceny, Receiving Stolen Goods;

   F. Prostitution and Solicitation of Prostitution;

   G. Vandalism; and

   H. Other Offenses that may Pose a Threat to Public Health and Safety but do not involve Violence or Drugs.

4. ADVERSE CRIMINAL HISTORY DECISIONS

   A. NOTICE: Denied Applicants and Residents for whom termination is proposed will receive a written notice outlining:

      i. The specific reasons for the denial or proposed termination;

      ii. The dispute process; and

      iii. The process for requesting reasonable accommodation in the dispute process for persons with disabilities.

B. Dispute Process Available to Applicants Denied for Criminal History

i. INFORMAL REVIEW: Denied Applicants have the right to request an informal review by an impartial person designated by the Management Agent who did not have any prior role in processing the Applicant's application and who is not the subordinate of the person who made the initial decision. Informal reviews must be requested in writing within ten (10) days from the date of receipt of the denial notice. If the Applicant requires assistance with making a written request, the Applicant may come into the management office before the end of the ten (10) day period to request assistance with the written request. If the Applicant does not submit a written request for an informal review within this time period, the decision will be considered final.

ii. DOCUMENT REVIEW: Prior to the informal review, a denied Applicant may request an opportunity to examine the application file and to copy any relevant documents at the Applicant's cost.

iii. WITNESSES AND REPRESENTATIVES: The Applicant may bring witnesses, representatives (including attorneys) or letters of support to the informal review. In the event the Management Agent presents any witnesses, the Applicant will have a right to cross-examine them.

iv. DISPOSITIONS: Denied Applicants are encouraged to bring to the informal review a copy of the disposition of the criminal offenses which form the basis of the denial. If, however, a denied Applicant admits that he or she committed a crime, was convicted of a crime or that he or she entered a guilty plea for the criminal offense in question, the Applicant will not be <u>required</u> to provide additional information regarding a criminal conviction or a guilty plea. This does not mean, however, that an Applicant who admits to committing a crime, was convicted of a crime or entered a guilty plea will not be allowed to discuss the circumstances or any of the review considerations set forth below if he or she wants the Management Agent to consider such additional information.

v. REVIEW CONSIDERATIONS: At the informal review, a denied Applicant may present, and Management Agent will consider, evidence (including verbal and written statements) of the following:

a. Circumstances: Circumstances of the criminal case(s) and mitigating or aggravating circumstances;

b. Conduct: The time, nature and extent of the Applicant's conduct (including the severity of the conduct and the seriousness of the offense);

c. Future Danger: Whether the conduct indicates that the Applicant would pose a danger to the health, safety or welfare of other residents; whether the Applicant has been rehabilitated so as not to pose such a danger; and other facts which would prevent the Applicant from posing a danger.

vi. REVIEW DECISIONS: A written review decision should be provided to the denied Applicant within ten (10) days following the informal review or , if the reviewer requested additional information from the Applicant, within ten (10) days following the date the information was submitted, or was due if not submitted, whichever comes first. If the reviewer's decision is to deny the application, the decision shall set forth the reasons for the denial in detail.

C. 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: "Disputing Decisions of Manager."

## PART III - RESIDENT BENEFITS AND OPPORTUNITIES

### <u>ARTICLE ONE</u>. RENT, INDIVIDUAL DEVELOPMENT ACCOUNTS, AND SECURITY DEPOSITS

1. Residents are required to pay rent according to the instructions provided by the Management Agent 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 positions the individual community to remain self-sustaining. 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 Fixed 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. When the Income Adjusted Rent and the Affordable Fixed 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 Fixed Rent."

5. When the Income Adjusted Rent and the Affordable Fixed 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.

6. Affordable Fixed Rents may be the only rent structure offered in certain communities identified under Atlanta Housing Authority's Annual MTW Plan. Income-adjusted Rents will not be available in those communities. All Residents residing in these communities will have to pay the applicable Affordable Fixed Rent for Assisted Apartments in accordance with the schedule established for their community.

7. Atlanta Housing Authority, in its discretion, may establish fixed-rate, or standard deduction and asset determination procedures to be used in calculating Income-Adjusted Rents. Standard income deductions would replace the calculation of income deductions based on actual expenses. Asset determinations would examine the nature and value of the asset in establishing procedures for setting a schedule of assets that would or would not be used in calculating Income-Adjusted Rents. The Atlanta Housing Authority Board of Commissioners must approve the schedule of Standard Income Deductions and any changes to the treatment of assets prior to implementation.

8. Resident, or any Resident household member, whose employment status was either (i) reasonably relied upon by the Management Agent in determining the Resident's initial eligibility for admission; or (ii) achieved to satisfy Atlanta Housing Authority's work requirement and related policies, who then becomes unemployed due to her/his resignation, quitting, termination for cause, or other reasons based on the Resident's or Resident household member's actions after the execution of the Lease for an Assisted Apartment and during the Resident's ongoing term of tenancy in an Assisted Apartment, 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 Fixed Rent based on prior employment status, as applicable, for the Resident in the Assisted Apartment.

   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.

9. 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.

10. 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 required to pay the Income Adjusted Rent or Affordable Fixed Rent, as applicable.

11. Under the Elderly Income Disregard policy, if an Elderly Resident, whose sole source of income is Social Security, SSI, and/or other fixed annuity pension and retirement plan income (Annual Fixed Income), becomes employed on a temporary, part-time, or other limited basis which does not result in the discontinuance of the Elderly Resident's Annual Fixed Income, the Elderly Resident's employment income will not be utilized in calculating annual income, and will be permanently disregarded thereafter.

12. Such Elderly Residents will still be expected to pay the Income Adjusted Rent based on the Annual Fixed Income and any adjustments to the Annual Fixed Income.

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

14. 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 household who has previously paid one or more months of rent but is unable to pay the minimum rent, due to extraordinary financial distress, may request hardship consideration.

    A. A hardship may exist for a Resident household when any one of the following circumstances is present: (i) the household is no longer eligible for (through no fault of the household) or is waiting for an eligibility determination for a Federal, State, or local assistance program; (ii) the income of the household has decreased because of extraordinary changed circumstances, including loss of employment (through no fault of the household); (iii) although the household is diligently seeking to increase the household's income, the increase is not yet sufficient to fully pay the new rent ; or (iv) such other extraordinary circumstances as 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 Resident household is otherwise complying with its obligations under an approved economic independence program and the planning documents formulated for the household.

C. Such actions under paragraph B above may include, but not be limited to:

i. Temporary suspension of the entire minimum rent requirement 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. Temporary suspension of the entire minimum rent for elderly and disabled Resident households for a period of time greater than ninety (90) days as determined by the Management Agent on a case-by-case basis. Such extended suspensions will also require the repayment of the arrearages within a time frame established by the Management Agent;

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

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

v. 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 the work requirement, housekeeping, other health and safety concerns, criminal activity prohibitions, reporting criminal activity on the premises, and economic independence initiatives.

2. Each Resident household must undergo a "Lease Renewal Review" or recertification process in a manner and at a frequency determined by the Management Agent based on the particular community in which the Resident resides. Lease Renewal Reviews may be conducted annually, on an interim basis, or over some longer interval of time according to the Moving to Work Annual Plan and as established in the Management Operating Procedures.
3. All household members, 16 years of age or older, are required to execute authorization forms allowing the Management Agent to conduct any background check, examination, or verification required for appropriate determinations under the initial or periodic recertification process in order to ensure Residents meet all criteria for continued occupancy. The period of the authorization will be established in the Management Operating Procedures.
4. Each adult Resident (18 to 61 years of age) is required to be gainfully employed on a full-time basis (see Part Two, Article Four) unless the resident is Elderly or Disabled.
5. Resident households with adult members who are neither Elderly nor Disabled and who are not legally and gainfully employed or self-employed on a full-time basis as defined by the Management Operating Procedures are subject to Lease termination.
6. The Management Agent may approve, in its sole discretion subject to verification, any combination of full-time or part-time gainful employment <u>and</u> full-time or part-time attendance at an Atlanta Housing Authority-recognized school, institution, and/or Atlanta Housing Authority-approved training program, provided that, when combined, total a minimum number of 30 hours equivalent to the full-time employment required in accordance with eligibility and qualification requirements of this Statement of Corporate Policies.
7. Any Resident, who loses Resident's job or welfare benefit for whatever reason due to Resident's own fault, shall continue to pay the Rent based on the Resident's prior employment income or welfare benefit status, unless 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 or welfare benefit was not the Resident's fault.

8. Residents who are not working full-time may be required to enroll and satisfactorily participate in an established and Atlanta Housing Authority-approved economic independence program, and may be required to have part-time employment.

9. 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.

10. Each adult Resident (18 to 61 year old), 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.

11. Upon review of a Resident's circumstances related to a verified disability of a member or members of the Resident household, the Management Agent may consider and document extensions of the work/program participation requirement as a reasonable accommodation if justified by the circumstances.

12. HUD established the Community Service and Self-Sufficiency Requirement (CSSR) which requires most unemployed public housing residents ages 18 - 61, who are not receiving TANF benefits, exempt from work requirements, engaged in work activities or unable to comply because of a disability, to contribute the HUD-specified number of hours each month to community service or an economic self-sufficiency program. Residents in compliance with Atlanta Housing Authority's full-time employment requirement of 30 hours per week, or a combination of training/schooling *and* work hours of 30 hours per week, are considered by Atlanta Housing Authority to be in compliance with CSSR.

13. Any school age member of the Resident household who is under 18 years of age and who has not completed her/his secondary education may be required to enroll in and attend an accredited public or private secondary academic or technical school.

14. Each Resident is responsible for ensuring that all school age members of the Resident household attend school on a regular basis in accordance with local school board policies and state law. Resident shall provide the Management Agent with such information, releases and authority so that the Management Agent can inquire into the attendance status of any school age child on the Lease.

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

16. 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 denial or significant reduction in rental subsidy resulting in an increase in the amount of Rent, or 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 households with small children or households 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 approve 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. The Management Agent may establish and, if approved by Atlanta Housing Authority or the Owner Entity, publish for each community with Assisted Apartments a schedule of reasonable fees and charges, including but not limited to Maintenance Charges, Transfer Fees, Application Fees, Damage Fees, Supplemental 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. TRANSFERS

1. Residents may request a transfer to another Assisted Apartment within the same community with Assisted Apartments subject to approval by the Management Agent (a "Community Transfer"). A request to move to another community is not considered a Community Transfer. Residents cannot initiate a transfer to another community. Residents must submit an application to the other community and, if approved, provide the appropriate notice under the current Lease, except as provided for in Section 6 of this Article Four.

2. Residents who have requested a Community Transfer must be current in all obligations under the Lease including, but not limited to having 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 disability 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 Community Transfer is required or initiated by Atlanta Housing Authority, Owner Entity, or Management Agent, or for such other valid reason, such as a reasonable accommodation as outlined in Section 6, as determined by the Management Agent.

6. The following policies apply to reasonable accommodation transfers.

   A. All reasonable accommodation transfers have priority over all other transfers, except natural disaster transfers, emergency transfers and relocations;

   B. Residents with disabilities who require a transfer to another Affordable Community as a reasonable accommodation will not be required to make a separate application at the desired Atlanta Housing Authority Affordable Community;

   C. A Resident's initial security deposit will be transferred to the new unit and no additional security deposit charges will be incurred when the Resident with disabilities transfers to another Affordable Community as a reasonable accommodation; and

   D. Residents with disabilities who require a transfer as a reasonable accommodation will not incur any termination penalties for early lease termination.

   E. Management Agents of Affordable Communities and Signature Communities will maintain a Transfer List that prioritizes the transfer of Residents who require a transfer due to a disability over new admissions of Applicants. The Transfer List will document the following:

      i. Date and time of each reasonable accommodation transfer request;
      ii. Name and address of Resident(s) to be transferred;
      iii. Reason(s) for transfer, including information regarding the Resident's reasonable accommodation request(s) and/or request for a UFAS-Accessible Unit or an Assisted Apartment with accessible features;

iv. Current disposition of reasonable accommodation transfer request;
v. Date of transfer; and
vi. Name of Resident transferred out of an Assisted Apartment to accommodate a Resident's disability per the Management Agent's execution of a lease addendum that requires a Resident without a disability to relocate to a vacant, non-accessible unit, at no expense to that Resident.

7. Atlanta Housing Authority may initiate "Relocation Transfers" outside of a community from time to time to facilitate Atlanta Housing Authority's property repositioning strategy, which includes, but is not limited to, the sale of property, revitalization activities, and/or development opportunities related to Atlanta Housing Authority-owned property, or for other valid reasons as determined by Atlanta Housing Authority.

8. Relocation Transfers are transfers from one Atlanta Housing Authority-owned community to another Atlanta Housing Authority-owned community ("Destination Community"). Relocation Transfers are not considered Community Transfers, as described above in this Article Four, and Residents are not subject to the same requirements as set forth above for Community Transfers. Residents who are subject to Relocation Transfers bypass the waiting list at the Destination Community and receive priority consideration for the first available Assisted Apartment at the Destination Community. Such Residents must meet the eligibility and suitability requirements outlined in Part II of the Statement of Corporate Policies in order to be transferred to the Destination Community.

9. In order to accommodate a Resident household and to avoid overcrowding when a suitably sized apartment is not available, the Resident may request and the Management Agent may approve a Community Transfer from one apartment to two apartments ("Split-Family Transfer"). The Resident's request must be in writing stating the reason for the Split-Family Transfer, unless initiated by the Management Agent. Whether requested by the Resident or initiated by the Management Agent, the Resident must agree in writing to a Split-Family Transfer.

10. To qualify for a Split-Family Transfer, the Resident household must meet the requirements of this Article Four, as applicable, and the proposed Head-of-Households of the apartments to be assigned under the Split-Family Transfer must: (a) be listed on the existing Lease as a member of the household as of the most recent recertification; and (b) be legally capable of executing a lease.
11. Split-Family Transfers may be used by Resident households subject to Relocation Transfers when a suitably sized apartment is not available in a Destination Community. Such Resident households must qualify for the Split-Family Transfer pursuant to this Article Four, as applicable.

## ARTICLE FIVE. INDIVIDUAL DEVELOPMENT ACCOUNT (IDA) PROGRAM

Atlanta Housing Authority, in its discretion, may implement an IDA program which would promote and encourage personal economic independence among Residents through a monetary incentive program linked to meaningful capacity-building initiatives 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.

## ARTICLE SIX. PET POLICY

1. Atlanta Housing Authority will permit 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 not a threat to the health and safety of other residents and otherwise meets the requirements established by 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 a Signature Community, who desire to keep a common household pet, may only do so if household pets are generally allowed at the community except as provided for in Section 5 below, and then only in strict accordance with the household pet procedures prescribed at the Resident's Signature Community.
4. Certain Signature Communities may exclude common household pets altogether if it is in the best interest of the community to do so, except as provided for in Section 5 below.
5. Management Agents will make reasonable accommodations for an "assistance animals" 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 condition tantamount to a disability or handicap. Pet policies for Affordable Communities and Signature Communities shall:

   A. Expressly exclude Assistance Animals;

B. Clarify that an "Assistance Animal" is an animal that is needed as a reasonable accommodation for persons with disabilities and is not subject to the general pet policy;

C. Define an "Assistance Animal" as an animal that is needed as a reasonable accommodation for persons with disabilities (Assistance Animals are animals that work, provide assistance, or perform tasks for the benefit of a person with a disability; or animals that provide emotional support that alleviate one or more identified symptoms or effects of a person's disability);

D. Remove height and weight restrictions for Assistance Animals;

E. Remove breed restrictions for Assistance Animals, except in accordance with local laws or ordinances;

F. Remove pet deposits for Assistance Animals; and

G. Clarify that any household pet exclusions in any community's policies do not apply to Assistance Animals required by Residents of Assisted Apartments.

## ARTICLE SEVEN. DISPUTING DECISIONS OF MANAGER

The purpose of Article Seven is to provide Applicants and Residents with a dispute process to address eligibility, general admissions, occupancy and leasing issues, and requests for reasonable accommodations in a manner that seeks equitable resolutions to such issues in an expedient and responsive manner. Applicants and Residents with disabilities may request reasonable accommodations in order to participate in the dispute process.

The dispute process outlined in this Article Seven shall not govern the process related to the denial of admission based on the findings of a criminal history report as outlined in Part II, Article Seven, Paragraph 4 (Adverse Criminal History Decision) of the Statement of Corporate Policies.

1. DISPUTE PROCESS FOR APPLICANTS

A. Applicants for Assisted Apartments who are denied admission based on eligibility and general admissions criteria and desire to dispute this action must request a meeting with the Management Agent or the Management Agent's designee within ten (10) calendar days of the disputed action.

B. An Applicant's request for a meeting must be in writing.

C. The Management Agent will schedule the meeting within a reasonable period of time, provided the Applicant's written request for the meeting was received in a timely manner.

D. An Applicant may bring a representative to this meeting to assist the Applicant.

E. The Management Agent is under no obligation to meet with the Applicant after the conclusion of the requested meeting.

F. A written decision should be provided to the Applicant within a reasonable time following the conclusion of the meeting. If the Management Agent's decision is to deny the application, the decision shall set forth the reasons for the denial.

2. DISPUTE PROCESS FOR RESIDENTS

A. The Management Agent is authorized under the terms of the Lease, Lease Addenda, and Apartment Rules to initiate an adverse action against a Resident with respect to leasing and occupancy violations that may result in a denial, significant reduction or termination of benefits otherwise due a Resident.

B. Residents may dispute such adverse actions.

C. Residents must request a meeting with the Management Agent or the Management Agent's designee within ten (10) calendar days of notice of the adverse action or in accordance with the dispute handling procedures in effect at the Resident's community with Assisted Apartments.

D. The period of time within which the Resident must request a meeting may be shorter if the Resident's Lease is being terminated for criminal activity and the Management Agent has reasonably determined that the Resident poses a threat to the health and safety of the Community.

E. A Resident's request for a meeting must be in writing.

F. The dispute process at each community with Assisted Apartments must allow the Resident to meet with an impartial designee of the Management Agent who did not participate in the initial decision affecting the Resident. The impartial designee may not be a subordinate of the person who made the initial decision. Any Resident meetings with the person who made the initial decision and the impartial designee may be combined, at the discretion of the Management Agent. A Resident may bring a representative to this meeting or meetings to assist the Resident.

G. The impartial designee of the Management Agent is under no obligation to meet with the Resident about the dispute after the conclusion of the final meeting.

H. A written decision should be provided to the Resident within a reasonable time following the conclusion of the meeting. If the impartial designee's decision is to rule against the Resident, the decision shall set forth the reasons for the denial, significant reduction or termination of benefits.

## 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. Amendments and/or updates to Fee Schedules, Rent Structures, Utility Allowances, Routine Maintenance and other charges may be approved from time to time. Such amendments and/or updates shall be implemented only after Residents have been given reasonable notice of the effective date.

ARTICLE TWO. SPECIAL PROGRAM, POLICY AND/OR STRATEGIC INITIATIVES

Atlanta Housing Authority may establish special programs, policies and strategies designed to address Resident economic or life-style self-sufficiency programs, *Moving to Work Demonstration Program* initiatives, safe and secure community enhancements and admission policies related to the use of bona fide law enforcement agencies or personnel, and homeownership opportunities.

Written proposals outlining procedures and processes developed for any special program, policy and/or strategy must be approved and/or authorized by the President and Chief Executive Officer for inclusion in the MTW Annual Plan or protocol before the initiative can be implemented.

ARTICLE THREE. RESPONSE TO FEDERALLY DECLARED DISASTERS AND OTHER FEDERALLY DECLARED EMERGENCIES

In order to respond to federally declared disasters and other federally declared emergencies Atlanta Housing Authority may provide disaster or other emergency relief utilizing Atlanta Housing Authority-owned conventional public housing apartments, subject to HUD or another third party providing additional funding or other resources for these purposes.

1. The President and Chief Executive Officer is authorized to develop an agency-wide disaster or other emergency relief plan to address the needs arising from a disaster or other emergency in a strategic, meaningful, and effective manner pursuant to applicable rules, regulations, emergency legislation, and Executive Orders.

2. The President and CEO is further authorized to take any action that the President and CEO may deem necessary and appropriate pursuant to federal disaster relief authorizations applicable to housing programs within the scope of the resources available to Atlanta Housing Authority, and to waive Atlanta Housing Authority's administrative policies governing Atlanta Housing Authority-owned conventional public housing communities related to intake procedures including but not limited to establishing a preference for disaster victims on waiting lists for Atlanta Housing Authority-owned conventional public housing, rent collections, subsidy payments, work program compliance, and other related and relevant administrative policies.

3. The President and CEO will provide the Board of Commissioners with a full report on a disaster or emergency relief plan implemented pursuant to this Article Three.

ARTICLE FOUR. APPROVAL OF MANAGEMENT PRACTICES

Management Operating Procedures, administrative procedures, processes, protocols, and management practices for any policy, initiative, or approach in this Statement of Corporate Policies shall be developed following the intent of this Statement of Corporate Policies and may be approved, amended, or withdrawn at the discretion of Atlanta Housing Authority.

ARTICLE FIVE. REVISIONS TO THE STATEMENT OF CORPORATE POLICIES

The President and Chief Executive Officer of Atlanta Housing Authority, as vested by the Board of Commissioners, can authorize revisions, as appropriate, to this Statement of Corporate Policies in order to clarify the original intent of any policy enumerated herein without the prior approval of the Board of Commissioners, provided that any such revision to this Statement of Corporate Policies does not alter, change, or modify the original intent of any policy. Any other such alterations, changes, and modifications to any policy in this Statement of Corporate Policies must be approved by the Board of Commissioners.

**[END]**

*Administrative Plan Governing the Housing Choice Program*

**First Adopted by the Board of Commissioners**
**August 25, 2004**

**Fifth Amended and Restated Administrative Plan**

**April 25, 2007**

**The Housing Authority of the City of Atlanta, Georgia**

***Administrative Plan Governing the Housing Choice Program***


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## The Housing Authority of the City of Atlanta, Georgia

### *Administrative Plan Governing the Housing Choice Program*

PREAMBLE

This Administrative Plan Governing the Housing Choice Program ("Administrative Plan") forms the broad policy basis of and authorizes the establishment of administrative procedures and practices that govern the Housing Choice Program of The Housing Authority of the City of Atlanta, Georgia ("Atlanta Housing Authority").

This Administrative Plan 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, and persons with disabilities.

This Administrative Plan envisions the creative design and eventual implementation of several initiatives designed to enhance the quality of life of program participants and promote participant economic and lifestyle self-sufficiency. Such initiatives include, but are not limited to: using housing choice vouchers to provide income-eligible families with access to communities of opportunity and implementing policies that support building healthy communities.

This Administrative Plan supersedes all prior versions of AHA's Housing Choice administrative plan and takes precedence over all administrative procedures and management practices that may conflict with this document.

This Administrative Plan is aligned with the Moving to Work Demonstration Program Agreement ("Agreement") executed on September 25, 2003, by and between the U.S. Department of Housing and Urban Development and Atlanta Housing Authority. The Agreement governs and supersedes, as appropriate, applicable Federal laws, rules, regulations, contracts, and agreements that have been waived and / or modified by the Agreement.

This Administrative Plan was adopted by the Board of Commissioners of Atlanta Housing Authority on August 25, 2004. Four amendments to the plan have been approved subsequent to the original date of adoption. This is the fifth amendment to the Administrative Plan

This Administrative Plan may be amended or modified by the President and Chief Executive Officer 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 – INTRODUCTION

ARTICLE ONE. OBJECTIVE OF THIS PLAN

This Administrative Plan is Atlanta Housing Authority's policy document for the Housing Choice Program in support of Atlanta Housing Authority's Vision of Healthy Mixed-Income Communities. The Administrative Plan forms the basis for the use of housing choice vouchers by eligible and qualified families in accessing affordable housing opportunities.

ARTICLE TWO. PROGRAM ADMINISTRATION

1. The Housing Choice Program Management Division is responsible for developing and implementing written operating procedures that are consistent with the policies outlined in this Administrative Plan.

2. Technology may be used to reengineer administrative processes in order to streamline program administration. The Housing Choice Program Management Division may create and apply electronic processes in any area in order to create, to the extent possible and practical, a paperless environment. Such electronic applications, among other innovations, may include the transmission and storage of documentation; digital signature recognition and verification on agreements; subsidy payments to owners and utility payments to families; management of the inspection process and communication of inspection results; and the management of landlord participation through communication of notices and the execution or termination of contracts. The Housing Choice Program Management Division will include the requirements for use of electronic administrative applications in the Housing Choice Program operating procedures.

ARTICLE THREE. MOVING TO WORK DEMONSTRATION PROGRAM

1. As a Moving to Work Demonstration Program agency, Atlanta Housing Authority will establish, implement and evaluate innovative affordable housing strategies that are designed to achieve greater success in helping low income families achieve economic independence.

2. While recognizing that implementation of various policy initiatives may be immediate, progressive, or refined through various demonstration programs, specific implementation strategies for any given year, which are not included in the Administrative Plan, may be enumerated in Atlanta Housing Authority's Moving to Work (MTW) Annual Plan.

3. The President and Chief Executive Officer of Atlanta Housing Authority, as vested by the Board of Commissioners, can authorize revisions, as appropriate, to this Administrative Plan in order to clarify the original intent of any policy enumerated herein without the prior approval of the Board of Commissioners, provided that any such revision to this Administrative Plan does not alter, change, or modify the original intent of any policy. Any other alterations, changes, and modifications to any policy in this Administrative Plan must be approved by the Board of Commissioners.

4. Administrative procedures, processes, protocols, and management practices for any policy, initiative, or approach in this Administrative Plan shall be developed following the intent of this Administrative Plan and may be amended from time to time at the discretion of Atlanta Housing Authority.

ARTICLE FOUR. FAIR HOUSING AND EQUAL OPPORTUNITY

1. Atlanta Housing Authority supports all applicable Federal and State nondiscrimination and fair housing laws and applicable HUD regulations in all housing and program activities. This support is evident in communities that Atlanta Housing Authority owns and those that Atlanta Housing Authority sponsors through revitalization and development activities. Atlanta Housing Authority monitors fair housing and equal opportunity compliance throughout its portfolio.

2. Atlanta Housing Authority acknowledges the protections afforded victims under the *Violence Against Women Act*, and has included administrative measures to address those protections in the Housing Choice Program operating procedures, as applicable.

3. Atlanta Housing Authority acknowledges the importance of serving Limited English Proficiency (LEP) persons. The extent to which it is determined that a significant number or proportion of the population served by the Housing Choice Program is comprised of LEP persons, Atlanta Housing Authority will develop and implement a LEP Plan to address the needs of such persons, as appropriate and in consideration of the cost and availability of resources that would be needed to provide translation services to LEP persons.

ARTICLE FIVE. FRAUD AND MISREPRESENTATION

1. The terms Applicant and Participant are defined to include all family/household members with respect to their compliance with the policies set forth in the Administrative Plan.

2. Applicants and Participants 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 participation in the Housing Choice Program.

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

4. An Applicant or Participant who has made any misrepresentation or engaged in acts of fraud at the time of admission, during any subsequent recertification, or at any other time shall be denied admission or be subject to termination, as applicable.

**PART II – WAITING LIST**

ARTICLE ONE. NOTIFICATION

1. Atlanta Housing Authority will comply with all applicable notice requirements as they pertain to public notices regarding the opening and closing of the Housing Choice Program waiting list. Atlanta Housing Authority will ensure broad outreach to eligible families throughout the greater Atlanta community by issuing written notice in at least two (2) publications of general public circulation. Public notices will announce opening and closing dates of the waiting list. Atlanta Housing Authority will ensure that the public notices will provide potential applicants with a reasonable period of time to make application to the Housing Choice Program.

2. The Housing Choice Program may accept applications at any time from families displaced, by demolition, repositioning, or disposition of Atlanta Housing Authority properties, or by other Atlanta Housing Authority or other related governmental initiated actions, provided such families have received an official ninety (90) day relocation notice.

3. In addition, Atlanta Housing Authority reserves the right to authorize the special admission of eligible and qualified applicants to the Housing Choice Program, as necessary and proper, in order to implement special initiatives such as a homeownership program; address an urgent local need as determined by Atlanta Housing Authority; or provide relocation and/or transfer assistance to eligible and qualified assisted residents and as a reasonable accommodation to eligible and qualified persons with disabilities who are being assisted or are on a transfer/waiting list to be assisted under any of Atlanta Housing Authority's housing programs. Atlanta Housing Authority will facilitate special admissions for these purposes in accordance with this Administrative Plan and any applicable rules and regulations.

ARTICLE TWO. APPLICATION

1. Atlanta Housing Authority utilizes a preliminary application process in order to identify persons interested in the Housing Choice Program.

2. The preliminary application process provides a mechanism for placing applicants on the Housing Choice Program waiting list. Such applicants will undergo a final eligibility and qualification process before being selected for consideration and offered assistance under the program.

ARTICLE THREE. ORGANIZATION AND MAINTENANCE

1. Atlanta Housing Authority randomly ranks preliminary applications on the waiting list utilizing an automated lottery system. Written procedures for the organization and maintenance of the waiting list are maintained and updated by the Housing Choice Program Management Division.

2. Applicants are responsible for updating, in writing, any changes to the information reported in their preliminary applications. An applicant's failure to provide updated information may result in the applicant being removed from the waiting list.

3. Atlanta Housing Authority will update the Housing Choice waiting list on a periodic basis. At the time the waiting list is being updated, applicants will be notified of any revisions to the selection or other eligibility criteria. In order to qualify for continued eligibility, applicants must meet the requirements established under the revised selection or other eligibility criteria.

ARTICLE FOUR. SELECTION

1. Definitions of Family.

   A. A Family is defined as two or more persons who may or may not be related that are residing together in the same household.

   B. An Elderly Family is defined as a Family in which the head-of-household, spouse, or sole adult member of the household is age 62 or older.

   C. A Disabled Family is defined as a Family in which the head-of-household, spouse, or sole adult member of the household is a person with a verifiable disability.

   D. Any member of an Elderly Family or Disabled Family, other than an approved live-in-aide, must be in compliance with the qualifications outlined in Article Two of this Part II.

2. Selection from the Housing Choice Program waiting list will be according to lottery ranking and compliance with the following qualifications.

   Provided the Applicant household is not an Elderly Family or a Disabled Family as defined in paragraphs C or D of section 1, at least one adult member of the Applicant household, 18 years of age or older, must be either legally and gainfully employed on a full-time basis for at least 30 hours per week or legally and gainfully self-employed in a legitimate business enterprise, appropriately documented, for at least 30 hours per week as defined by the Housing Choice Program operating procedures; and all other members of the household must be either:

   A. 18 to 61 years old, and legally and gainfully employed or self-employed (as described above) on a full-time basis at least 30 hours per week;
   B. 18 to 61 years old and a full-time student at an AHA recognized school or institution;
   C. 18 to 61 years old and employed (but not self-employed) on a part-time basis and either attending an AHA-recognized school or institution on a part-time basis or participating in an AHA-approved training program for a combined minimum total of 30 hours per week for employment and education/training;
   D. Elderly; or
   E. Disabled.

3. General Considerations for Selection

   A. To be eligible for Selection in accordance with this Article, an Applicant's qualification for selection as a Participant must be verified through appropriate documentation as reasonably required by Atlanta Housing Authority.

   A. Participants, or any member of the Participant's household, whose employment status was either (1) reasonably relied upon by Atlanta Housing Authority in determining the Participant's initial eligibility for admission; or (2) achieved to satisfy Atlanta Housing Authority's work requirement and related policies, and who then becomes unemployed after admission to the Housing Choice Program due to her / his resignation, quitting, termination for cause, or other reasons based on the Participant's or member's actions, shall not receive any rent relief as a result of the loss of employment and shall continue to pay Total Tenant Payment based on prior employment status. This provision may be waived if the Participant can document, to the satisfaction of Atlanta Housing Authority, with the burden of proof on the Participant, that the reason for the Participant's loss of employment was based on an event that was beyond the control of the Participant and for which the Participant was not at fault.

4. Selection from the Housing Choice Program waiting list may be made for special admissions as described above in Article One, Section 3 without considering the applicant's position on the waiting list.

5. The Housing Choice Program Management Division will process applications from the waiting list based on the lottery rank and determine the eligibility and qualification of applicants in accordance with written operating procedures for the Housing Choice Program.

**PART III – ELIGIBILTY**

ARTICLE ONE. DETERMINATION AND VERIFICATION

1. An Applicant desiring to participate in the Housing Choice Program must first demonstrate that: (a) Applicant meets one of the definitions of Family and is an eligible low income household based on total annual household income pursuant to and verified according to U.S. Department of Housing and Urban Development (HUD) rules and regulations; (b) the Applicant satisfies HUD's statutory and regulatory requirements for citizenship/eligible immigrant status; (c) the Applicant must be in compliance with the qualifications outlined in Part II, Article Four; and (d) the Applicant would be a suitable participant based on past satisfactory behavior including, but not limited to, an acceptable criminal background record and a commitment to abide by the rules and obligations of the Housing Choice Program.

2. All Applicants must attend a final eligibility interview. At this interview, the applicant will complete a full application in accordance with the Housing Choice Program operating procedures. Failure of an Applicant to attend the final eligibility interview will result in the denial of further consideration of the Applicant for the Housing Choice Program.

ARTICLE TWO. PARTICIPANT OBLIGATIONS AND RESPONSIBILITIES

1. Participants are to reside in their assisted unit in such a manner so as to not adversely impact the quiet, peaceful enjoyment of the premises by other community residents while meeting all the obligations set forth in this Administrative Plan, including, but not limited to those obligations relating to housekeeping, other health and safety concerns, criminal activity prohibitions, and economic independence initiatives.

2. Atlanta Housing Authority will enforce higher health and safety standards in how Housing Choice Program participants maintain their housing units. Atlanta Housing Authority will make meeting these higher standards a requirement of families receiving and maintaining their vouchers.

3. Atlanta Housing Authority will issue a Moving to Work Voucher to eligible and qualified Applicants admitted into the Housing Choice Program. In order to maintain their participation in the Housing Choice Program, Participants must comply with all obligations and responsibilities outlined in the Obligations of the Family section of the Moving to Work Voucher.

ARTICLE THREE. SUITABLITY

It is the responsibility of owners, landlords, or their representatives to screen Housing Choice voucher holders as to their suitability and acceptability as tenants. Pursuant to federal regulations, Atlanta Housing Authority does not release information regarding applicants and participants to owners, landlords, or their representatives.

ARTICLE FOUR. INELIGIBILITY DETERMINATION

Atlanta Housing Authority will notify Applicants, in writing, of an ineligibility determination. Such notification will set forth the reasons for the ineligibility determination and provide instructions regarding how the ineligible Applicant may request a review of the determination.

## PART IV – RENT

ARTICLE ONE. TENANT RENT

Families receiving rental assistance under the Housing Choice Program will pay either 30% of their monthly adjusted income for rent or the minimum rent established by Atlanta Housing Authority, whichever is higher. The result of this calculation is referred to as the Total Tenant Payment, which amount may be adjusted, provided the assisted family is responsible for any utility or service, by the allowance for utilities and other services ("Utility Housing Allowance Payment"), as determined by Atlanta Housing Authority. The result of this calculation is referred to as the Tenant Rent. When assisted families are eligible for Utility Housing Allowance Payments, Atlanta Housing Authority will issue electronic funds that will be redeemable at approved utility providers. The Housing Choice Program Management Division will manage such determinations as outlined in this Article One in accordance with Housing Choice Program operating procedures.

ARTICLE TWO. MINIMUM RENT

1. Participants must pay a minimum rent of $125, or such other amount approved by Atlanta Housing Authority.
2. The minimum rent requirement does not apply to Participants, in which all household members are either elderly and/or disabled.
3. Generally, Atlanta Housing Authority does not expect that the establishment of a new minimum rent will create a hardship since no such rent initiatives will go into effect without providing advance notice. Even so, a Participant who has previously paid one or more months of rent but is unable to pay the minimum 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 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 family); (iii) although the family is diligently seeking to increase the family's income, the increase is not yet sufficient to fully pay the minimum rent; or (iv) such other extraordinary circumstances as Atlanta Housing Authority may determine.

   B. Atlanta Housing Authority 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 Atlanta Housing Authority 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 Atlanta Housing Authority.

(ii) Temporary suspension of the entire minimum rent for elderly and disabled Residents for a period of time greater than ninety (90) days as determined by AHA on a case-by-case basis. Such extended suspensions will also require the repayment of the arrearages within a time frame stabled by AHA management.

(iii) Accelerated enrollment in one of Atlanta Housing Authority's approved economic independence program components;

(iv) Referral to third party agencies who assist participants with the payment of rent; and

(v) Such other actions as Atlanta Housing Authority shall direct.

4. Any Participant, who loses Participant's job or welfare benefit for whatever reason due to Participant's own fault, shall continue to pay the Total Tenant Payment based on the Participant's prior employment income or welfare benefit status, unless the Participant can document to the satisfaction of the Atlanta Housing Authority, with the burden of proof on the Participant, that the reason for the Participant's loss of employment or welfare benefit was not the Participant's fault.

## ARTICLE THREE. AFFORDABILITY

In order to preserve affordability, the Tenant Rent plus any allowance for utilities, if applicable, cannot exceed the payment standard in effect for different size units (based on the number of bedrooms) in the market area or submarket area in which the unit is located. Exceptions may be considered in order to implement special initiatives such as a homeownership program; to address an urgent local need as determined by Atlanta Housing Authority; or to provide reasonable accommodations to eligible and qualified persons with disabilities

## ARTICLE FOUR. ELDERLY INCOME DISREGARD

Atlanta Housing Authority has created an Elderly Income Disregard program. If an Elderly participant, whose sole source of income is Social Security, SSI, or other fixed annuity pension and retirement plan income (Annual Fixed Income), becomes employed on a temporary, part-time, or other limited basis which does not result in the discontinuance of the Elderly participant's Annual Fixed Income, the Elderly participant's employment income will not be utilized in calculating annual income, and will be permanently disregarded thereafter. Such Elderly participants will still be expected to pay the Income Adjusted Rent based on the Annual Fixed Income and any adjustments to the Annual Fixed Income.

## ARTICLE FIVE. STANDARD INCOME DEDUCTIONS AND ASSET DETERMINATIONS

Atlanta Housing Authority, in its discretion, may establish fixed-rate, or standard deduction and asset determination procedures to be used in calculating annual income. Standard income deductions would replace the calculation of income deductions based on actual expenses. Asset determinations would examine the nature and value of the asset in establishing procedures for setting a schedule of assets that would or would not be used in calculating annual income. The Atlanta Housing Authority Board of Commissioners must approve the schedule of Standard Income Deductions and any changes to the treatment of assets prior to implementation.

## PART V – SUBSIDY STANDARDS

ARTICLE ONE. OCCUPANCY STANDARDS

1. To avoid overcrowding and the conditions that may arise from overcrowding, participants will be issued vouchers so that generally no more than two adults occupy a bedroom. Additional consideration may be given to families with small children or families with other significant circumstances, who may request a larger bedroom size voucher.

2. A Live-in Aide that is essential for the care and support of an elderly or disabled Participant, the need for which having been certified by a medical professional, may reside in the assisted unit with the elderly or disabled Participant. Atlanta Housing Authority 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 pursuant to this Administrative Plan prior to occupancy, and continue to demonstrate her/his suitability and status as a Live-in Aide for as long as the Live-in Aide resides in the assisted unit.

ARTICLE TWO. PAYMENT STANDARDS

1. In accordance with the provisions of the *Moving to Work Demonstration Program Agreement*, Atlanta Housing Authority may establish, adopt, and implement reasonable payment standards that may be adjusted upward or downward as reasonably determined by Atlanta Housing Authority.

2. Payment standards will be consistent with the objectives and determinations for setting market rents outlined in Part VIII, Article One of this Administrative Plan with respect to aligning the Housing Choice Program with private sector practices and maximizing the use of the subsidy resource in support of strategies that promote the deconcentration of poverty, enhance opportunities for the development of affordable housing, provide reasonable accommodation for disabled and elderly Participants, and provide for the sustainability of the Housing Choice Program. In doing so, Atlanta Housing Authority can establish and implement separate payment standards within submarket areas within its jurisdiction.

3. Methodologies in establishing payment standards will utilize data derived from a variety of resources including, but not limited to, market rent studies (whether conducted by Atlanta Housing Authority or other public or private entities), HUD Fair Market Rent data from Atlanta and/or other comparable metropolitan markets, private sector databases, academic and other empirical studies, and regional economic forecasts.

4. Whenever the Atlanta Housing Authority establishes or amends the payment standards for the Housing Choice Program pursuant to this Article Two, Atlanta Housing Authority will publish a schedule of the adopted payment standards, which will indicate the applicable payment standard for units of varying sizes based on the number of bedrooms and the implementation effective date of the newly established or amended payment standards. Newly established or amended payment standards will go into effect for Participants, whether a decrease or increase, on the effective date of the next annual recertification.

## PART VI – VOUCHER ISSUANCE

<u>ARTICLE ONE.</u> FAMILY BRIEFINGS

1. Applicants and Participants are required to attend a family information briefing in order to receive a Housing Choice Program voucher. The purpose of the briefing is to inform and educate applicants and participants regarding the rules and regulations of the Housing Choice Program in order for them to successfully and fully participate in the Program. The briefing may include a discussion of the Housing Choice Program family obligations, a review of key program documents, and program updates to include Moving To Work Program initiatives.

2. Housing Choice Program vouchers will be issued to participants during the briefing. Failure to attend a scheduled briefing may result in loss of eligibility for or termination of housing subsidy benefits.

<u>ARTICLE TWO.</u> TERM OF VOUCHER ISSUANCE

Housing Choice Program vouchers are issued for sixty (60) days, or for such other period of time as determined reasonable under the circumstances particularly in those cases involving relocation or reasonable accommodations for persons with disabilities. Otherwise, extensions may be granted only for a verifiable good cause and will be considered on a case by case basis.

<u>ARTICLE THREE.</u> TRANSFER OF ASSISTANCE

1. A Housing Choice Program voucher holder cannot choose to transfer her/his Housing Choice voucher to another person or family. There is no expressed nor implied right that permits the selective transfer of a Housing Choice voucher that was issued to a voucher holder for her/his exclusive use as head-of-household on behalf of an assisted family. The transfer of a Housing Choice voucher can only be determined and directed by Atlanta Housing Authority.

2. If the voucher holder, as the head-of-household of a housing unit assisted under the Housing Choice Program, abandons the household or is involuntarily removed from the household, Atlanta Housing Authority will determine the disposition of the voucher in accordance with the Housing Choice Program operating procedures.

## PART VII – MOVES WITH CONTINUED ASSISTANCE

<u>ARTICLE ONE.</u> OUTBOUND PORTABILITY

1. Housing Choice Program Participants may choose to receive housing subsidy benefits in areas outside Atlanta Housing Authority's jurisdiction. Participants may move ("port" or "porting") to an area in another housing authority's jurisdiction ("Receiving Housing Authority"). Atlanta Housing Authority will place conditions for outbound families on Receiving Housing Authorities.

2. Those conditions may include the minimum rent requirement; family compliance with a work requirement; periodic criminal background checks; participation in self-sufficiency programs; limitations on the maximum payment standard; and other requirements as new policies are implemented. Atlanta Housing Authority will monitor Participant compliance with its requirements and, likewise, the resulting conditions required of the Receiving Housing Authority.

3. Based on the specific conditions required of the Receiving Housing Authority, it will have the option of whether to accept or reject the Participant porting to its jurisdiction.

4. Atlanta Housing Authority voucher holders will be required to adhere to all Atlanta Housing Authority rules and family obligations, including but not limited to, the work requirement, training program participation, periodic criminal background screenings, and participation in self-sufficiency programs. Atlanta Housing Authority may, at its discretion, waive such conditions on a case by case basis, for participants that port to geographic areas where Atlanta Housing Authority determines that it is not feasible to administer program compliance for porting families.

5. Atlanta Housing Authority will seek to enter into cooperative agreements with other local housing authorities regarding portability conditions and will educate program participants and local landlords regarding any modifications to outgoing portability procedures.

<u>ARTICLE TWO.</u> INBOUND PORTABLITY

1. Atlanta Housing Authority will absorb an inbound portability family; exchange a voucher with the Initial Housing Authority; or bill the Initial Housing Authority for the cost of administering the inbound portability family.

2. In those cases involving inbound portability families, such families must meet Atlanta Housing Authority's eligibility criteria and qualifications pursuant to Part II, Article Four and Part III of this Administrative Plan

**PART VIII – MARKET RENTS**

<u>ARTICLE ONE.</u> SETTING MARKET RENTS

1. Atlanta Housing Authority will periodically explore different rent structures/computations to further align the Housing Choice Program with private sector practices as well as to maximize the use of the subsidy resource.

2. Atlanta Housing Authority will utilize market practices and other recognized methods for establishing market rent standards in order to determine rents that will be paid to Owners/Landlords. These standards will be used in place of the Fair Market Rents (FMR's) published annually in the Federal Register.

<u>ARTICLE TWO.</u> DECONCENTRATION

1. Atlanta Housing Authority supports HUD's goal for deconcentration of families in high poverty areas and the furtherance of meaningful fair housing choice for low-income families. Atlanta Housing Authority may require that applicants and participants attend mobility counseling training to improve their awareness of the rental market so that they will be able to make better informed choices with respect to their housing search.

2. In seeking to achieve the goal of deconcentration, Atlanta Housing Authority will refuse to enter into a Housing Assistance Payments Contract with any Owner / Landlord if more than forty percent (40%) of the units in a multifamily development will be assisted under either Section 8 or Section 9 of the United States Housing Act of 1937, as amended, unless (i) the development has been designated as housing for the elderly or for the disabled; (ii) the development was built or rehabilitated under the Project-Based Certificate Program; or (iii) the development is a designated as an Elderly, almost-Elderly, or disabled with supportive services Development that has been awarded Project-Based Assistance by the Atlanta Housing Authority.

3. Atlanta Housing Authority may enter into Housing Assistance Payments contracts with landlords for up to 100% of the units in a multifamily development that is classified as elderly, almost-elderly, or disabled, as such terms are defined by this Administrative Plan.

4. Atlanta Housing Authority is pledged to outcomes that lead to the deconcentration of poverty. Atlanta Housing Authority will develop a deconcentration plan that will define and, in some cases, may 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. Atlanta Housing Authority will work with other housing authorities in metropolitan Atlanta to facilitate moves in the Atlanta area that would provide program participants a greater range of employment and better education opportunities. Other revitalization, development and program activities that promote the deconcentration of poverty are part of Atlanta Housing Authority's strategic agenda.

<u>ARTICLE THREE.</u> PROGRAM MARKETING AND OUTREACH

1. Atlanta Housing Authority will continue to make a concerted effort to educate the public about the Housing Choice Program and to foster successful relationships throughout human services organizations, local and state governments, and the business community in order to ensure the availability of quality affordable housing units and family self-sufficiency opportunities for Housing Choice Program participants.

## PART IX – INSPECTIONS

<u>ARTICLE ONE.</u> QUALITY UNITS

1. Atlanta Housing Authority will adopt enhanced local standards ("AHA Local Inspection Standards") to ensure that assisted units offer Housing Choice participants excellent quality housing in healthy communities with good quality of life infrastructure. Factors such as levels of concentrated poverty, neighborhood crime, proximity to good neighborhood schools, access to public transportation, and access to retail businesses, among other factors, will be considered. Unit, site, and neighborhood conditions must continue to meet AHA Local Inspection Standards for as long as the assisted unit remains on the Housing Choice Program. It is the goal of the Housing Choice Program to provide opportunities for all participants to reside in units in neighborhoods that promote the furtherance of educational and employment goals, good citizenship, and peaceful and cooperative community living.

2. It is an Atlanta Housing Authority policy to recruit Owners / Landlords with quality housing units to participate in the Housing Choice Program. Conversely, it is also the policy of Atlanta Housing Authority to disapprove marginal housing units for participation in the Housing Choice Program.

<u>ARTICLE TWO.</u> TYPES OF INSPECTIONS

1. To ensure compliance with program goals and objectives, Atlanta Housing Authority will conduct the following types of unit inspections:

   A. Pre-Contract Inspections. Upon request by the Owner/Landlord, Atlanta Housing Authority will conduct a Pre-Contract Inspection. The Pre-Contract Inspection is designed to provide feedback to prospective Owners / Landlords as to the acceptability of their unit for participation in the Housing Choice Program. A nominal fee may be charged for a Pre-Contract Inspection. By conducting a Pre-Contract Inspection, Atlanta Housing Authority makes no representation as to participant family selection of the unit or that the unit in question will be accepted on the Housing Choice Program at the time of any Initial Inspection.

B. Initial Inspections. Upon receipt of a signed Request for Tenancy Approval Form (RTA) Atlanta Housing Authority will schedule an initial inspection. Initial Inspections are designed to occur prior to a participant's move into a unit. A standardized list of defects or repairs required in order for the unit to "pass" inspection will be provided to the Owner / Landlord. No more than thirty (30) days will be allowed for completion of defects or repairs. A second Initial Inspection can be requested by the Owner / Landlord. If the unit fails to "pass" the second "Initial Inspection", a fee may be charged for additional "Initial Inspections" to cover the administrative costs incurred as a result of multiple inspections.

C. Reexamination Inspections. Atlanta Housing Authority will reinspect assisted units annually, on an interim basis, or over some longer interval of time based on standardized inspection procedures and the Moving To Work Demonstration Program initiatives. Atlanta Housing Authority will provide no less than ten (10) days written notice to participants and Owners / Landlords of the scheduled "Reexamination Inspection". A standardized list of defects or repairs required in order for the unit to "pass" inspection will be provided to the Owner / Landlord. Defects and repairs will also be designated as the responsibility of the Owner / Landlord or of the Participant. Generally, no more than thirty (30) days will be allowed for completion of defects or repairs. In some instances defects or repairs involving health and safety issues may be designated as "24 hour violations" which require immediate repair, i.e. within twenty-four (24) hours. A follow-up Reexamination Inspection will be scheduled to confirm that repairs have been completed. If the unit fails to "pass" the second "Reexamination Inspection", a fee may be charged for additional "Reexamination Inspections" to the party responsible, i.e. the Owner / Landlord or the participant to cover the administrative costs incurred as a result of multiple inspections.

D. Special Inspections. Atlanta Housing Authority will conduct "Special Inspections" on selected units as it deems necessary. "Special Inspections" may be originated as a result of complaints from the community, reports from the participant or the Owner / Landlord, etc. The "Special Inspection" will be conducted according to the Atlanta Housing Authority standardized procedure for inspections. A fee may be charged for "Special Inspections" to the party responsible, i.e. the Owner / Landlord or the participant to cover the administrative costs for such an inspection.

E. Quality Control Inspections. In order to ensure consistent and accurate application of AHA Local Inspection Standards, Atlanta Housing Authority will perform quality control inspections on a minimum of five percent (5%) of all units approved. Units that receive Quality Control Inspections will be randomly selected.

ARTICLE THREE. INSPECTION PROCEDURES

1. Atlanta Housing Authority will establish written operating procedures for each type of inspection as outlined in the preceding Article Two. Atlanta Housing Authority will adhere to federal, state, county, city and/or local housing codes, as required, to enhance the AHA Local Inspection Standards.

2. Deficiencies that present an immediate danger or threat to the health and /or safety of the participant will be noted as twenty-four (24) hour violations and must be corrected or abated within twenty-four (24) hours. Examples of such violations include but are not limited to, gas leaks, flooding in the unit, mold contamination, missing or inoperable smoke detectors.

3. As a result of an inspection, if all repairs designated as the responsibility of the Owner / Landlord are not completed within the specified time period, the Housing Assistance Payments to the Owner / Landlord will be abated and the contract terminated, as appropriate.

4. As a result of an inspection, if all repairs designated as the responsibility of the participant are not completed within the specified time period, the participant may be terminated from participation in the Program.

5. Atlanta Housing Authority will post all inspection results electronically on its website. This posting will be the official notification of inspection results and updates available to Owners/Landlords. Owner/Landlords are required to register to use and login to Atlanta Housing Authority's website in order to view inspection results and updates. No further notice will be given.

**PART X – HAP CONTRACTS**

<u>ARTICLE ONE.</u> LANDLORD ELIGIBILITY

1. In order to establish eligibility as a participating Owner/Landlord in the Housing Choice Program, the Owner/Landlord must submit an application and authorize Atlanta Housing Authority to conduct a background check. This background check may include criminal history screening; a credit history review or Dun & Bradstreet report, as applicable; a current financial statement or audited financial statements, as applicable; and other appropriate information depending on the size and nature of the Owner/Landlord entity's business.

2. Owners/Landlords must provide evidence ownership of any property to be leased under the Housing Choice Program.

3. Owners/Landlords must use the Automated Clearing House (ACH) Network in order to receive Housing Choice Program payments. ACH information must be submitted to Atlanta Housing Authority for direct deposit purposes into the Owner/Landlord-designated account.

4. In addition, Atlanta Housing Authority will develop a mandatory Owner/Landlord Certification Training Program. This program will offer Owners/Landlords information on Housing Choice Program requirements and their responsibilities and obligations as participating Owners/Landlords.

5. Any Owner/Landlord that makes misrepresentations, commits fraud, violates program rules, or fails to reimburse outstanding amounts upon notice and demand by Atlanta Housing Authority, shall be debarred from participating in the Housing Choice Program. Atlanta Housing Authority will pursue other action(s) against such Owners/Landlords, as it deems necessary and appropriate.

<u>ARTICLE TWO.</u> HAP CONTRACT EXECUTION

1. Following successful lease approval, unit inspection, and rent determination, Atlanta Housing Authority will compute the participant's total tenant payment, participant's share of the rent and the utility reimbursement amount. The HAP Contract is then prepared, posted on Atlanta Housing Authority's secure website for the execution. The Owner/Landlord logins to the website and executes the HAP Contract with a secure digital signature.

2. Atlanta Housing Authority will advise participants and Landlords that side payments for additional rent or for items normally included in the rent for other unassisted families are illegal and strictly prohibited.

3. Upon the proper approval and execution of the HAP Contract, Atlanta Housing Authority will issue payment to the Landlord via direct deposit.

## PART XI – REEXAMINATIONS

### ARTICLE ONE. FREQUENCY

1. All applicants and participants must certify at application that they have the ability to comply with all requirements of the Housing Choice Program. In addition, participants must certify at each reexamination that they have the ability to comply with all Housing Choice Program requirements.

2. Atlanta Housing Authority has the discretion to reexamine the income, family composition, and program compliance of each Participant on a periodic basis in accordance with the regulatory relief afforded it under its Moving to Work agreement with HUD. Atlanta Housing Authority's Participant reexamination process is outlined in Atlanta Housing Authority's strategies and initiatives presented in the Moving to Work Annual Plan will be implemented in accordance with the Housing Choice Program operating procedures.

3. Applicants and participants are required to execute an authorization allowing Atlanta Housing Authority to conduct any background check, examination, or verification required for appropriate determinations under the initial or periodic reexamination process. The period of the authorization will be established in the Housing Choice Program operating procedures.

### ARTICLE TWO. NOTIFICATION OF CHANGE

1. Based upon the results of any reexamination, Atlanta Housing Authority will notify the Participant and the Owner/Landlord, as appropriate, of applicable changes thirty (30) days prior to the effective date of any such change.

2. Based upon the results of any reexamination indicating that a Participant would be paying the entire Tenant Rent with zero (-0-) dollar assistance, Atlanta Housing Authority would notify such Participants that they are no longer eligible for continued assistance. Atlanta Housing Authority's notification would congratulate such participants as successful graduates of the Housing Choice Program who have demonstrated their ability to become economically independent of housing subsidy assistance.

### ARTICLE THREE. FAILURE TO ATTEND

Participant's failure to attend scheduled reexamination appointments may be the basis for termination of housing subsidy benefits.

### ARTICLE FOUR. PROGRAM MOVES

1. A program move is the situation in which a Participant notifies the Owner/Landlord in accordance with the lease that the Participant will be moving. A program move typically occurs on the anniversary date or end of the initial term of the lease. In some cases, Atlanta Housing Authority may initiate a program move due to Owner/Landlord non-compliance; reasonable accommodations for persons with disabilities; victim protection under the Violence Against Women Act; or for other mandatory reasons pursuant to the Housing Choice Program operating procedures.

2. Atlanta Housing Authority may limit or deny program moves elected by Participants who do not qualify for a program move at the time of their periodic reexamination or at the end of the initial lease term as set forth in the Housing Choice Program operating procedures.

## PART XII - TERMINATIONS

<u>ARTICLE ONE.</u> LEASE TERMINATION

1. Atlanta Housing Authority provides a Housing Choice Tenancy Addendum to the Lease Agreement which outlines program requirements and obligations for both the parties to the lease agreement. Owners/Landlords must provide their own lease agreement, which is governed, in the event of a conflict in terms and conditions, by the Housing Choice Tenancy Addendum to the Lease Agreement.
2. The Owner/Landlord may terminate the lease with the Participant for cause during the term of the lease based upon applicable Housing Choice Program rules and regulations, State Law, or according to the terms and conditions of the lease agreement. The Owner/Landlord is required to provide Atlanta Housing Authority with a copy of any written notice to vacate or termination correspondence given to the Participant.
3. The Participant must provide at least a thirty (30) day written notice to the Owner/Landlord and Atlanta Housing Authority prior to lease expiration. In addition, the Participant must also comply with lease requirements regarding notice and terminating tenancy.
4. Provided the Participant is eligible for a program move pursuant to Part XI, Article Four, the Owner/Landlord and the Participant may mutually terminate the lease prior to the end of the first term of the lease. The Owner /Landlord and Participant are required to provide a fully executed copy of the lease termination to Atlanta Housing Authority at least sixty (60) days prior to lease termination.
5. Atlanta Housing Authority will terminate the HAP Contract through the end of the approved lease termination date. Atlanta Housing Authority will make no future subsidy payments after the HAP Contract has been terminated. If the Participant continues to reside in the unit after the HAP Contract has been terminated, Atlanta Housing Authority will make a single housing assistance payment to the Owner/Landlord for the 30-day period following the date of HAP Contract termination, after which time, the participant will be solely responsible for the full amount of the contract rent.
6. The HAP Contract terminates automatically when a family moves from a unit.

<u>ARTICLE TWO.</u> DENIAL AND TERMINATION OF ASSISTANCE

1. Atlanta Housing Authority may deny admission to Applicants or terminate housing assistance benefits of Participants if they or any family member are or have been engaged in criminal activity that could reasonably be expected to indicate a threat to the health, safety or welfare of others.
2. OFFENSES SPECIFICALLY IDENTIFIED BY HUD

   Pursuant to 24 CFR § 982.353, Applicants may be denied admission if any member of the household:

   (a) Has been evicted from federally assisted housing for drug-related criminal activity within the three year period preceding application;

(b) Is currently engaging in the illegal use of drugs;
(c) Has ever been convicted of drug-related criminal activity for manufacture or production of methamphetamine on the premises of federally assisted housing;
(d) Is subject to a lifetime registration requirement under a state sex offender registration program; or
(e) Is abusing or demonstrates a pattern of abuse of alcohol that may threaten the health, safety, or right to peaceful enjoyment of the premises by other residents.

3. VIOLENT OR DRUG-RELATED OFFENSES

Applicants may be denied admission and Participants may be subject to termination of housing subsidy benefits if any member of their households have been convicted of, arrested or under an outstanding warrant for, or reasonably believed to be engaged in any Violent or Drug-Related Offenses. Examples of Violent or Drug-Related Offenses include, but are not limited to the following:

(a) Homicide, Murder, Voluntary manslaughter;
(b) Rape, Sexual Battery, other Aggravated Sex-Related Crimes;
(c) Child Molestation, Child Sexual Exploitation;
(d) Drug Charges;
(e) Kidnapping, False Imprisonment;
(f) Terrorism;
(g) Arson;
(h) Possessing, Transporting or Receiving Explosives or Destructive Devices with the Intent to Kill, Injure, Intimidate, or Destroy;
(i) Assault and Battery (Simple and Aggravated);
(j) Trafficking, Distribution, Manufacture, Sale, Use, or Possession of Illegal Firearms
(k) "Carjacking;"
(l) Robbery;
(m) Hate Crimes;
(n) Criminal Damage to Property Endangering Life, Health and Safety;
(o) Aiding and Abetting in the Commission of a Crime Involving Violence; and
(p) Other Violent or Drug-Related Offenses that may *Pose a Threat to Public Health and Safety*.

4. OTHER CRIMINAL OFFENSES (Not Violent or Drug-Related)

Applicants may be denied admission and Participants may be subject to termination if any member of their households have, within the five year period preceding application or at any time during program participation, been convicted of, arrested or under an outstanding warrant for, or reasonably believed to be engaged in any other criminal offenses that do not involve violence or drugs. Examples of Other Criminal Offenses (not violent or drug related) include, but are not limited to the following:

(a) 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) Motor Vehicle Theft;
(e) Burglary. Larceny, Receiving Stolen Goods;
(f) Prostitution and Solicitation of Prostitution;
(g) Vandalism; and
(h) Other Offenses that may Pose a Threat to Public Health and Safety but do not involve Violence or Drugs.

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

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

6. OTHER DENIAL OF ASSISTANCE – APPLICANTS/PARTICIPANTS

In addition the causes for termination outlined in Sections 1-5 of this Article Two, Applicants and Participants can be denied assistance for the following reasons.

A. An Applicant or Participant that owes rent or other amounts to Atlanta Housing Authority or to another housing agency in connection with Housing Choice Program.

B. An Applicant or household member, either of whom being a former Housing Choice Program Participant or former public housing resident, who failed to reimburse Atlanta Housing Authority or another housing agency for overpaid assistance or underpaid rent or for any outstanding charges owed to an Owner/Landlord under an assisted lease paid by Atlanta Housing Authority or another housing agency.

C. An Applicant or Participant who is not in compliance with Part II, Article Four and Part III of this Administrative Plan.

## ARTICLE THREE. OTHER TERMINATIONS OF HAP CONTRACTS AND ASSISTANCE

1. Atlanta Housing Authority may terminate a HAP Contract if the Owner/Landlord is not in compliance with the terms and conditions of the HAP Contract, or if the Owner/Landlord has committed fraud.

2. Atlanta Housing Authority may deny or terminate assistance if Atlanta Housing Authority has reason to believe that a Participant household member has failed to abide by Housing Choice Program rules, regulations, or family obligations, regardless of whether the household member has been arrested or convicted. Atlanta Housing Authority shall have the discretion to consider all of the circumstances in each case, including the seriousness of the offense, if the violation is a first offense or a pattern of behavior, the extent of participation by the household member, and the effects that denial or termination would have on the other members of he Participant household not involved in the prescribed activity.

ARTICLE FOUR. TERMINATION OF ASSISTANCE NOTIFICATION

If Atlanta Housing Authority deems it necessary to terminate assistance, Atlanta Housing Authority will give both the Participant and the Owner/Landlord a thirty (30) day written termination notice.

ARTICLE FIVE. INFORMAL REVIEWS / INFORMAL HEARINGS

1. Applicants may exercise the right to an Informal Review regarding certain adverse actions that may result in the denial, significant reduction or termination of housing subsidy benefits. Requests for an Informal Review must be made in writing within ten (10) business days from the date of the notice of ineligibility or denial of assistance from the Atlanta Housing Authority. The Informal Review will be conducted by a person appointed by Atlanta Housing Authority who is neither the person who made or approved the decision under review nor the subordinate of such person. Both the Applicant and Atlanta Housing Authority will have the opportunity to present evidence at the Informal Review. An Informal Review decision shall be provided in writing to the Applicant within fifteen (15) business days from the date of the Informal Review. Requests for Informal Reviews, supporting documentation, and a copy of the final decision shall be retained in the applicant's file.
2. Participants may exercise the right to an Informal Hearing regarding certain adverse actions that may result in a denial, significant reduction or termination of housing subsidy benefits. Requests for an Informal Hearing must be made in writing within ten (10) business days from the date of the notice of denial or termination of assistance from the Atlanta Housing Authority. The Informal Hearing will be conducted by a person appointed by Atlanta Housing Authority who is neither the person who made or approved the decision under review, nor the subordinate of such person. Both the Participant and Atlanta Housing Authority will have the opportunity to present evidence at the Informal Hearing. An Informal Hearing decision shall be provided in writing to the Participant within fifteen (15) business days from the date of the Informal hearing. Requests for Informal Hearings, supporting documentation, and a copy of the final decision shall be retained in the Participant's file.
3. Applicants and Participants with disabilities may request reasonable accommodation in order to participate in the Informal Review/Informal Hearing process, as applicable.

## PART XIII – SPECIAL PROGRAMS

ARTICLE ONE. SPECIAL PROGRAMS DEVELOPMENT AND IMPLEMENTATION

Atlanta Housing Authority will develop special programs under the Housing Choice Program that support Atlanta Housing Authority's overarching priorities and program initiatives described in the Moving to Work Annual Plan. Special programs, such as a homeownership program, will be implemented in accordance with Housing Choice Program operating procedures.

## PART XIV - RESPONSE TO FEDERALLY DECLARED DISASTERS

In order to respond to federally declared disasters and other federally declared emergencies Atlanta Housing Authority may provide disaster or other emergency relief utilizing Housing Choice tenant-based vouchers on a funding availability and resource allocation basis.

ARTICLE ONE. AGENCY-WIDE DISASTER OR OTHER EMERGENCY RELIEF PLANS

1. The President and Chief Executive Officer is authorized to develop an agency-wide disaster or other emergency relief plan to address the needs arising from a disaster or other emergency in a strategic, meaningful, and effective manner pursuant to applicable rules, regulations, emergency legislation, and Executive Orders.

2. The President and CEO is further authorized to take any action that the President and CEO may deem necessary and appropriate pursuant to federal disaster relief authorizations applicable to housing programs within the scope of the resources available to Atlanta Housing Authority, and to waive Atlanta Housing Authority's administrative policies governing the Housing Choice tenant-based voucher program related to intake procedures including but not limited to establishing a preference for disaster victims on waiting lists for the Housing Choice Voucher Program, rent collections, subsidy payments, work program compliance, and other related and relevant administrative policies.

3. The President and CEO will provide the Board of Commissioners with a full report on a disaster or emergency relief plan implemented pursuant to this Article Seven.

## PART XV – PROJECT-BASED VOUCHERS

ARTICLE ONE. PROJECT-BASED RENTAL ASSISTANCE

Atlanta Housing Authority established a Project-Based Rental Assistance (PBRA) program in accordance with the regulatory relief afforded it under its Moving to Work agreement with HUD. Atlanta Housing Authority's ongoing administration of the PBRA program is outlined in operating procedures and is implemented in accordance with Atlanta Housing Authority's strategies and initiatives presented in the Moving to Work Annual Plan.

## Appendix P: Candidate Communities for Permanent Percentage-Based, Elderly, Disabled, or Non-Elderly Disabled Designations

| High-Rise Communities |
|---|
| Antoine Graves* |
| Barge Road |
| Cheshire Bridge |
| Cosby Spear Towers |
| East Lake Towers |
| Georgia Avenue |
| Graves Annex* |
| Hightower Manor |
| John O. Chiles* |
| Juniper & 10th |
| Marian Road |
| Marietta Road |
| M.L. King Tower* |
| Palmer House* |
| Peachtree Road |
| Piedmont Road |
| Roosevelt House* |

*In pre-development as of June 30, 2006. The John O. Chiles Main Building received a 9% Low Income Housing Tax Credit allocation in September 2006.

**Additional Communities:**

AHA and its private sector development partners will designate public housing assisted units in certain facilities to be constructed as part of AHA-sponsored community revitalizations as Elderly Only, Disabled Only, and Non-Elderly Disabled Only. These will be mixed-finance facilities where public housing operating subsidy will be used for a percentage of the units. These newly constructed facilities will be identified intermittently through the development and master planning process.

# IMPLEMENTATION PROTOCOLS

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# IMPLEMENTATION PROTOCOLS (SUBMITTED FOR HUD REVIEW)

**THE HOUSING AUTHORITY OF THE CITY OF ATLANTA, GEORGIA (AHA)**
**MTW AGREEMENT**
**PROCESS FOR DESIGNATING PUBLIC HOUSING ASSISTED UNITS**

**The Housing Authority of the City of Atlanta, Georgia (AHA) and the United States Department of Housing and Urban Development (HUD) are parties to a Moving to Work Demonstration Agreement (MTW Agreement), effective July 1, 2003. Using its MTW flexibility, AHA will use an alternate process for designating public housing assisted units for defined populations.**

**MTW Agreement Reference**

In accordance with the provision of the MTW Agreement, Article I.A, Section III.A, AHA is relieved of all the provisions of the United States Housing Act of 1937, as amended (the "1937 Act") except for Sections 3(b)(2) (definition of terms "low-income families" and very low-income families", Section 18 (governing demolition and disposition), Section 12 (governing wage rates), Section 16(a)(3) as amended (Davis Bacon compliance), Section 504 of the Rehabilitation Act of 1973 and its implementing regulations, and Fair Housing, to the extent necessary for the Agency to implement its MTW demonstration. AHA discussed its plans to implement designations in its FY 2005, FY 2006, and FY 2007 Implementation Plans. Also in accordance with the provision of the MTW Agreement's Statement of Authorizations, Section III.A, AHA is authorized to define its own occupancy policies.

**AHA Process for Designating Public Housing Assisted Units**

The development of quality affordable housing designated for the elderly and disabled persons is an important strategy for AHA in addressing the critical challenges associated with the mixed elderly and young disabled populations that reside in AHA-owned high-rise communities. These communities, which once provided housing for elderly only, now house a mix of Elderly (persons ages 62 and older), Almost Elderly (persons ages 55 to 61), and Young Disabled (disabled persons ages 18 to 54 years of ages). Consistent with the findings of the December 2004 State of Connecticut Legislative Program Review & Investigations Committee report entitled "Mixing Populations in State Elderly/Disabled Housing Projects", the majority of management problems in these communities stem from two primary factors: (1) social conflicts arising from generational or lifestyle differences such as different tastes in music, dress, and social and recreational activities as well as frequency of visitations, types of visitors and times of daily activity; and (2) specific concerns with non-elderly mentally ill residents including problems ranging from fears of an elderly person's perception of mentally ill people to actual incidences of harm upon elderly tenants by younger mentally ill residents. These problems are further complicated by the lack of funding to provide supportive services to meet the needs of these special populations.

To improve the quality of housing for elderly and disabled persons, AHA has developed new strategies to address the complex lifestyle and special needs issues described previously that are associated with mixing the elderly and young disabled individuals in our 17 high-rise communities. These strategies include but are not limited to: (1) implementing a 4:1 elderly/almost-elderly admissions policy (Elderly Admissions Preference) admitting four elderly/almost elderly applicants to every one young disabled applicant at its 17 high-rise communities, (2) implementing permanent percentage-based mixed-population, and (3) implementing permanent Elderly Only and Disabled Only designations. AHA also plans to implement permanent designations for Section 9 assisted units to support the development of mixed-finance, mixed-income elderly housing in connection with its revitalization efforts, including but not limited to the revitalizations of Capitol Homes, Grady Homes, Harris Homes, McDaniel Glenn, and Perry Homes.

In order to effectively implement designations of public housing assisted units, particularly as part of mixed-finance senior or disabled only developments to be constructed in association with AHA-sponsored community revitalizations, AHA requires a much more streamlined and nimble process than is provided by Section 7 of the Housing Act . The provisions of Section 7 of the Housing Act require submission of an extensive designated housing plan to HUD for a 60-day review and approval process each time that a public housing agency identifies public housing assisted units that it desires to designate. In addition, these provisions require AHA to submit a renewal request every two years after the initial five year approval. This process imposes a tremendous administrative burden for AHA. Moreover, the short-term nature of designations through this process creates a temporal nature that creates a risk that private investors and financial institutions are not willing to take. As a consequence, the deal may be rendered financially infeasible.

It is also important to note that many activities permitted by MTW must, by their nature, extend beyond the term of the MTW Agreement, as is standard in most real estate transactions. These endeavors require AHA and its private sector development partners to leverage capital investments that would not be available to AHA under existing law (without MTW). This financing would not be available without nimbleness to be responsive in decision-making and the clarity in occupancy policies.

In a legal opinion rendered to AHA regarding this issue, Reno and Cavanaugh have advised, "AHA's MTW Agreement gives broad authorization to AHA in the design and implementation of creative housing programs. The MTW Agreement specifically supersedes any provisions of the 1937 Act if necessary to implement activities contained within the Statement of Authorizations. I. Since the MTW Agreement grants AHA the ability to define its own occupancy policies and Section 7 itself defines occupancy policies, the MTW Agreement controls, and AHA is not bound by specific Section 7 requirements that conflict with AHA's proposal." (A copy of the opinion letter from Reno and Cavanaugh is attached to this implementation protocol.)

In this light, AHA will implement permanent designations subject to the following process:

1. AHA will hire a third party expert to conduct a comprehensive market study of its jurisdiction to assess the need for housing for seniors and persons with disabilities. This study will be repeated every ten years allowing AHA to respond, where needed, to the impact of significant changes in market conditions.
2. AHA will share the initial study with HUD officials in the MTW Office, Public Housing Management and Occupancy Division and Fair Housing along with a comprehensive plan discussing strategies AHA will implement to address

these needs.

3. Moving forward, AHA will designate housing units for elderly and/or disabled persons based on the above-referenced market study and comprehensive plan. AHA will share the market study and comprehensive plan with HUD prior to implementing such designations. AHA will ensure that these designations comply with Fair housing. AHA will cooperate with HUD on any related audits or investigations to ensure that Fair Housing requirements are met on an ongoing basis. All designations will be permanent.

**HUD Review**

Pending HUD's review and comments on AHA's FY 2008 CATALYST Implementation Plan.

# THE HOUSING AUTHORITY OF THE CITY OF ATLANTA, GEORGIA (AHA)
# MTW AGREEMENT
# HOPE VI SITE AND NEIGHBORHOOD STANDARDS

**The Housing Authority of the City of Atlanta, Georgia (AHA) and the United States Department of Housing and Urban Development (HUD) are parties to a Moving to Work Demonstration Agreement (MTW Agreement), effective July 1, 2003. AHA has developed its own Site & Neighborhood Standards.**

**MTW Agreement Reference**

In accordance with the provision of the MTW Agreement's Statement of Authorizations, Section VII.C: Simplification of the Development and Redevelopment Process, the regulatory requirements of 24 CFR Part 941 shall not apply to the implementation of the activities of AHA except for the provisions of 24 CFR 941.202, 24 CFR 941.207, CFR 941.208, CFR 941.209, CFR 941.602(d), CFR 941.610(b) all as modified by the terms of this MTW Agreement; provided, however, that in determining the location of six or more newly constructed or substantially rehabilitated units or developments, the AHA is authorized to adopt the alternative Site and Neighborhood Standards set forth in Section VI.B.3 herein.

**AHA Protocol for HOPE VI Replacement Housing Site & Neighborhood Standards**

As reflected in AHA's Moving to Work (MTW) Agreement Section VI.B.3, AHA no longer uses the HUD Site & Neighborhood Standards for project based assisted units. In lieu of the HUD Standards, AHA has developed its own site and neighborhood standards while complying with the Fair Housing Act and Title VI of the Civil Rights Act of 1964 for PBRA developments. AHA PBRA Site & Neighborhood Standards are in accordance with the requirements found within Section VI.B.3.a to Section VI.B.12.

AHA has elected to adopt the PBRA Site & Neighborhood Standards as set forth in Section VI.B.3.A for the evaluation of HOPE VI off-site housing. In HOPE VI developments where the 'surrounding neighborhood' is defined in the applicable NOFA as a three-mile radius of the site of the existing project, the PBRA Site & Neighborhood Standards as set forth in Section VI.B.3.A shall be applied to the areas beyond the defined three-mile radius. These sites are: Grady Homes, McDaniel Glenn and Capitol Homes.

In HOPE VI developments where the 'surrounding neighborhood' is not defined, the PBRA Site & Neighborhood Standards shall be applied to all off-site developments. These sites are: Carver Homes, Perry Homes and Harris Homes.

This protocol shall apply to any, future HOPE VI sites.

**HUD Review**

Pending HUD's review and comments on AHA's FY 2008 CATALYST Implementation Plan.

Atlanta Housing Authority

**VIA E-TRANSMISSION AND FEDERAL EXPRESS**

November 3, 2006

Ms. Dominique Blom
Deputy Assistant Secretary
Office of Public Housing Investments
U.S. Department of Housing and Urban Development
451 Seventh Street, S.W.
Room 4130
Washington, D.C. 20410-5000

**RE: Permanent Designations for Senior Only Housing**

Dear Dominique:

As you are aware, we recently received an approval letter from HUD approving a senior-only designation for a limited time period for Columbia Senior Residences at Mechanicsville, a proposed mixed-income, mixed-finance senior development that will be constructed as Phase III of the HOPE VI revitalization of McDaniel Glenn. After consultation with certain HUD representatives and AHA representatives, Milan Ozdinec authorized the approval to be in effect for the longer of the statutory five years or until the MTW Agreement expires on July 1, 2010, whichever is longer in duration (recognizing that AHA's current MTW Agreement may be eligible for extended time frames). Mr. Ozdinec advised me that any longer term for the senior-only designation would have to be appealed to you, pursuant to the relief provided under our MTW Agreement.

We appreciate Mr. Ozdinec's willingness to allow for a longer term for the elderly designation (typically five years), but the temporal nature of this approval creates a risk that private investors and financial institutions are not willing to take. As a consequence, the deal may be rendered financially infeasible. As you know, Congress' intent in authorizing the MTW Demonstration was to create a statutory and regulatory environment in which MTW agencies could be innovative, creative and nimble problem solvers in their local real estate markets. In discussions with HUD officials concerning our designation application, we have been advised that HUD believes that the designation can not be permanent because the needs in our local community may change in five years. As you know, conventional underwriting (for 30 year first mortgage debt and for tax credit investments) is based on a current market study for the project being underwritten which looks at current market conditions. The pro formas, underwriting assumptions and market analysis for Columbia Senior Residences at Mechanicsville are based on a senior only project. Moreover, we all know that mixing seniors and young disabled persons does not create a positive living environment for seniors and, in fact, such mixes have harmed the ability of AHA-owned senior properties to attract seniors. We also know that this mixed population issue is a national problem. It would make no sense whatsoever to develop a new senior community which could be materially adversely affected in five or so years, because of bad policy and a less than thoughtful decision.

HUD officials have stated that their hands are tied because they are limited to providing statutory relief only for the period of the MTW Agreement and thus the designation can only be for the term of the MTW Agreement or five years, whichever is longer. AHA reads our MTW Agreement in a fundamentally different manner. We believe HUD is only limited as to the period when it may grant "permanent" designations under the MTW Agreement rather than for how long a designation may remain in effect. There are a number of precedents that support this interpretation. One such precedent is the HOPE VI Grant Agreement. The premise underlying the HOPE VI Grant Agreement is to provide statutory and regulatory relief so that mixed-income communities may be developed and operated. There are a number of agreements that have been entered under the auspices of the HOPE VI Grant Agreement platform that survive well beyond the term of such Grant Agreement.

Under our MTW Agreement, AHA is relieved from the provisions of the United States Housing Act of 1937, as amended (the "Act"), and related HUD regulations and agreements, with certain specified exceptions, to implement its MTW demonstration. We believe that Section 7 of the Act relating to Designated Housing for Elderly and Disabled Families was waived under AHA's MTW Agreement. Moreover, AHA has stated in our MTW Business Plan that we intend to solve our mixed population problem in elderly buildings through developing, in partnership with private sector developers, senior-only housing for seniors and supportive services housing for young mentally disabled persons.

## Appeals

1. We respectfully submit this letter to appeal HUD's decision not to grant a permanent senior only designation to Columbia Senior Residences of Mechanicsville.

2. Moreover, AHA and our development partners are planning a number of future senior deals and supportive housing deals which will require permanent designations. We are requesting that HUD resolve the issue regarding whether permanent designations may be granted by HUD pursuant to (a) AHA's MTW Agreement and (b) the authority granted the Secretary under the 1996 MTW authorizing language to waive statutory provisions and regulations, except those few statutory provisions which are specifically set forth in the MTW authorizing language. Without the benefit of permanent designations, mixed-finance projects will not be financeable.

Given the importance of this issue to AHA, we have arranged for an opinion of outside legal counsel, Reno & Cavanaugh to advise AHA on the "interpretation" of our MTW Agreement. A copy of that legal opinion accompanies this letter.

Time is of the essence for the senior only designation for Columbia Senior Residences at Mechanicsville. The scheduled financial closing for Columbia Senior Residences at Mechanicsville is confirmed for December 13, 2006. I recognize that the larger issue relating to the interpretation of the MTW Agreement may take longer, but it too is of critical importance. I look forward to discussing this matter with you further during our meeting on December 4, 2006, at which time I hope we can have a decision on the first issue. Should you have questions or require additional information, please feel free to call me at 404-817-7201 or Reneé Bentley, Vice President of Strategy & Planning, at 404-817-7213.

Thank you in advance for your consideration.

Sincerely,

Renée Lewis Glover
President & Chief Executive Officer

Enclosure
C: Milan Ozdinec (HUD D.C. Office)
Eugene Geritz (HUD Denver Office)
Boyce Norris (HUD Atlanta Office)
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November 2, 2006

Renee Glover
Atlanta Housing Authority
230 John Wesley Dobbs Ave.
Atlanta, GA 30303

**Re: Permanent Seniors-Only Designation for Columbia Senior Residences at Mechanicsville**

Dear Ms. Glover,

You have requested that Reno & Cavanaugh, PLLC provide an opinion regarding the ability of AHA under the Moving to Work Demonstration Program (the "MTW Program") to provide a permanent "seniors-only" designation to the Columbia Senior Residences at Mechanicsville, which will be constructed as a part of Phase III of the HOPE VI revitalization of McDaniel Glen. Set forth below is our understanding of the facts underlying your request to us, our analysis of AHA's MTW Agreement (as defined below) and applicable law, and our conclusion based on that analysis.

1. Background and Facts

AHA has informed us that it seeks to permanently designate its Columbia Senior Residences as a "seniors-only" development. The U.S. Department of Housing and Urban Development ("HUD") has informed AHA that such a designation would not comply with Section 7(f) of the United States Housing Act of 1937 ("1937 Housing Act"), which requires that seniors-only designations only be effective for five years, with permissible extensions for two-year periods.

We have reviewed the Moving to Work Demonstration Agreement between AHA and HUD dated September 25, 2003 (the "MTW Agreement") pursuant to authorization set forth at Section 204 of the Omnibus Consolidated Rescissions and Appropriations Act of 1996 (Pub. L. 104-134) (the "MTW Statute"), which authorized the MTW Program. The MTW Agreement addresses the authority of AHA to define its own general occupancy policies under the MTW Program in order to address and enhance housing and quality of life improvements at its communities. [1]

You have asked us for our opinion whether the necessary waiver of Section 7(f) of the 1937 Act is allowable under the MTW Program and MTW Agreement.

[1] See MTW Agreement, Appendix A, Art. III.A

2. Analysis

The MTW Program gives broad authorization to participating public housing agencies ("PHAs") in the design and implementation of creative housing programs. Under the MTW Statute all provisions of the 1937 Act, except for Sections 12 and 18, may be waived pursuant to terms proposed by the PHAs and approved by the Secretary.[2] AHA's MTW Agreement implements this statutory authorization, in part, by allowing AHA to define its own general occupancy policies. Specifically, AHA's MTW Agreement states at Appendix A, Section III.A:

> "AHA is authorized to develop or specifically identify to HUD its occupancy policies, and such attendant policies as AHA may deem appropriate in its MTW Plan. These policies will be designed to allow AHA to further one or more of AHA's strategic goals and also fulfill the MTW goals/criteria...AHA will continue designing occupancy policies that are intended to address... affordable housing programs that are designed to enhance or promote a greater quality of living at each of the communities."

Together, the MTW Statute and the MTW Agreement contemplate the waiver of Section 7 of the 1937 Act. The MTW Statute was enacted subsequent to Section 7,[3] and Section 7 was not specifically exempted from HUD's waiver authority under the MTW Statute. Whenever a statute explicitly lists exemptions, it is assumed that anything not listed is not exempted.[4] The MTW Statute clearly prohibits the waiver of Sections 12 and 18, but not of Section 7. Thus, the MTW Statute gives the Department the ability to waive Section 7 requirements.

Further, the MTW Agreement specifically supersedes any provisions of the 1937 Act if necessary to implement activities contained within the Statement of Authorizations.[5] Since the MTW Agreement grants AHA the ability to define its own occupancy policies and Section 7 itself defines occupancy policies, the MTW Agreement controls, and AHA is not bound by specific Section 7 requirements that conflict with AHA's proposal. Thus, AHA may define its occupancy policy for Columbia Senior Residences as permanently "seniors-only", so long as such a designation would otherwise meet the requirements of the MTW Agreement.

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[2] See Pub. L. 104-134, Sec. 204(b), (e)

[3] The MTW Demonstration was enacted as part of Public Law 104-134 on April 26, 1996. Section 7 was enacted as part of Pub. Law 104-120 on March 28, 1996.

[4] *Expressio unius est exclusio alterius,* a principle of statutory construction, states that when one or more things of a class are expressly mentioned, others of the same class are excluded.

[5] See MTW Agreement, Art. I

In addition, a permanent designation of "seniors-only" is within the scope of the MTW Agreement, even though its impact will persist beyond the current term of the MTW Agreement. The Department has stated that a permanent designation cannot be granted because housing needs of the local community may change, and thus the designation can only last for the term of the MTW Agreement. Indeed, the renewal requirement in Section 7(f) is predicated on ensuring that local housing needs require occupancy policies that may otherwise implicate the Fair Housing Laws.[6] However, as with the requirements of Section 7, the purpose for renewal is also superseded by the MTW Agreement. Thus, as long as AHA can show that a permanent seniors-only designation is necessary to achieve the goals of the MTW Program and MTW Agreement, the MTW Agreement overrides Section 7(f), and the reasons for the renewal under Section 7 are irrelevant.

Moreover, if HUD were to interpret its own and PHAs' authority under the MTW Program to be limited to activities that would have their full effect and must terminate within the term of the MTW Agreement, then PHAs' ability to carry out the demonstration would be seriously undermined. Given the stated purposes of the MTW Program, this would be an unreasonable interpretation of Congressional intent and inconsistent with the prior administration of the MTW Program. Consider the flexible use of MTW "block grant" funds, which are the combined operating funds, capital funds, and Section 8 voucher funds received by a PHA under the MTW Program. To the extent that a PHA uses voucher funds, for example, to engage in public housing development or rehabilitation activity, these funds are obviously used for a period of time that will exceed the term of an MTW agreement, since after the MTW agreement ends the Section 8 voucher funds will still be invested in the development or rehabilitation work. This is allowable because the MTW "waiver" being used is the one time permission to use voucher funds for an activity that would not otherwise be authorized under the 1937 Act. Similarly, a permanent designation of Columbia Senior Residences as seniors-only, done in order to secure long-term financing, is a one time waiver of Section 7(f) of the 1937 Act. It is not a waiver that must be periodically renewed, such that the same waiver would have to be granted for the project to continue after the MTW Agreement ended.

Many projects undertaken under MTW have lives that last beyond the term of the MTW Agreement, as is standard in most real estate transactions. In the Columbia Senior Residences project, AHA is endeavoring to raise capital investment that would not be available to AHA under existing law without MTW. This is entirely consistent with the purpose of MTW of giving PHAs and HUD "the flexibility to design and test various approaches for providing and administering housing assistance that: reduce cost and achieve greater cost effectiveness in Federal expenditures..."[7] AHA's

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[6] The Fair Housing Act, as amended by the Fair Housing Amendments Act, prohibits discrimination in rental housing on the basis of disability and contains specific provisions for housing restricted to elderly residents.

[7] Pub. L. 104-134, Sec. 204(a)

proposal for Columbia Senior Residences stretches the Federal dollar by leveraging private financing to support both Federal and local affordable housing goals. We understand that this financing would not be available without the clarity in occupancy policies that the permanent seniors-only designation would provide.

A more reasonable interpretation of the Department's authority is that the authorizations under the MTW Program last for the life of the project approved, and not the term of the MTW Agreement. Any other result would chill creative activity under the MTW Program and undercut the purpose of the MTW Statute to promote flexibility and innovation. This alternative interpretation of the Department's authority should control since it is more in line with Congressional intent. Therefore, the Department has the authority under the MTW Statute to grant the permanent seniors-only designation to the Columbia Senior Residences project.

It is also important to consider that Congress did not establish a "term" for MTW activities or agreements, or even mandate that there be agreements at all. Establishing agreements with limited terms for PHAs participating in MTW was an administrative decision by HUD that HUD has the authority to change. In authorizing the fungibility of operating, capital, and voucher funds, Congress clearly permitted PHAs under MTW to use funds for activities that would not necessarily be concluded within a few years. Thus, any time frame imposed on any MTW activity is administratively, and not statutorily imposed, and thus can be administratively extended.

3. Conclusion

Based on the facts known to us, as described above, it is our opinion that a permanent designation of "seniors-only" for the Columbia Senior Residences project, and other similar projects, furthers the goals set forth under the MTW Agreement and the MTW Program and is allowable under the same.

4. Qualifications

The foregoing opinion is subject to the following qualifications:

1. We express no opinion as to the truth or accuracy of any warranties, representations or statements of fact contained in any documents examined by us.

2. No opinion is given herein as to any laws regulating the business of any of the parties other than AHA.

3. The opinions set forth above are based solely upon the Federal laws and regulations of the United States, and the state of facts in effect on the date hereof. Nothing

herein shall be construed to be an opinion as to the applicability or effect of the laws of any other jurisdiction including, without limitation, the laws of the State of Georgia.

4. This opinion speaks only as of the date of its delivery. We have no obligation to advise the recipients of this opinion, or anyone else, of any matter of fact or law thereafter occurring, whether or not brought to our attention, even though that matter affects any analysis or conclusion of this opinion.

5. Whenever our opinion herein is qualified by the phrase "it is our understanding," "known to us," "our attention" or words of similar import, such phrase is intended to indicate that the current actual conscious knowledge of the attorneys with this firm engaged in the representation of the AHA (and not to the knowledge of the firm generally) is not inconsistent with that portion of the opinion which such phrase qualifies. We have made no independent investigation with respect to such matters.

6. This opinion is limited to the matters expressly set forth herein, and no opinion is to be inferred or may be implied beyond the matters expressly so stated.

This opinion letter has been provided solely for the benefit of, and may be relied upon by, the addressee, at its request, and no other person or entity shall be entitled to rely herein without the express written consent of Reno & Cavanaugh, PLLC.

Sincerely,

Reno & Cavanaugh, PLLC

# ADOPTED
# IMPLEMENTATION PROTOCOLS

# THE HOUSING AUTHORITY OF THE CITY OF ATLANTA, GEORGIA (AHA)
# MTW AGREEMENT
# REVISION OF MTW BENCHMARKS

**The Housing Authority of the City of Atlanta, Georgia (AHA) and the United States Department of Housing and Urban Development (HUD) are parties to a Moving to Work Demonstration Agreement (MTW Agreement), effective July 1, 2003. Since the execution of the MTW Agreement, AHA has clarified the MTW Benchmarks and their corresponding outcome measures included in Attachment D of its MTW Agreement in order to align them with AHA's Business Plan objectives.**

**Revised Benchmarks and Outcome Measures**

Program Benchmark Definitions. Attachment D of AHA's Moving to Work (MTW) Agreement executed September 25, 2003, provides definitions for each of eleven MTW Program Benchmarks. Since the execution of its MTW Agreement, AHA has revisited these definitions and their corresponding outcome measures in order to align them with AHA's Business Plan objectives. The table below reflects the realignment and further clarification of AHA's MTW Program Benchmarks in comparison with the original language in AHA's MTW Agreement:

**MTW Program Benchmark Definitions**

| Original Definitions | Clarified Definitions |
|---|---|
| **Public Housing Program** | **Public Housing Program (See Note A below)** |
| **% Rents Uncollected**<br>Annual percentage of rents that is uncollected. | **% Rents Uncollected**<br>Gross tenant rents receivable through the last day of the Fiscal Year (FY) divided by the total amount of tenant rents billed during the FY shall be less than or equal to the target benchmark. |
| **Occupancy Rate**<br>Annual physical occupancy rate. | **Occupancy Rate**<br>The ratio of occupied public housing units to available units as of the last day of the FY shall be greater than or equal to the target benchmark. **(See Note B below)** |

| Original Definitions | Clarified Definitions |
|---|---|
| **Public Housing Program** | **Public Housing Program (See Note A below)** |
| **Emergency Work Orders Completed or Abated in <24 Hours**<br>Percentage of emergency work orders that will be completed or abated in less than 24 hours. | **Emergency Work Orders Completed or Abated in <24 Hours**<br>The percentage of emergency work orders that are completed or abated within 24 hours of issuance of the work order shall be greater than or equal to the target benchmark. (Abated is defined as "emergency resolved through temporary measure, and a work order for long term resolution has been issued.") |
| **Routine Work Orders Completed in < 30 Days**<br>Percentage of routine work orders that will be completed in less than 30 days. | **Routine Work Orders Completed in < 7 Days**<br>The average number of days that all non-emergency work orders will be active during the FY shall be 7 days or less. |
| **% Planned Inspections Completed**<br>Percentage of all units inspected and common areas. | **% Planned Inspections Completed**<br>The percentage of all occupied units and common areas that are inspected during the FY shall be greater than or equal to the target benchmark. **(See Note C below)** |
| **Housing Choice Program (Section 8)** | **Housing Choice Program (Section 8)** |
| **Budget Utilization Rate**<br>Annual percentage of Housing Choice Budget authority spent on housing assistance payments and administration. | **Budget Utilization Rate**<br>The expenditure of FY Housing Choice Annual Budget allocation for MTW vouchers utilized for MTW eligible activities will be greater than or equal to the target benchmark of 98%. |
| **% Planned Annual Inspections Completed**<br>Annual percentage of occupied units inspected. | **% Planned Annual Inspections Completed**<br>The percent of all units under contract that are inspected directly by AHA or any other agency responsible for monitoring the property during the fiscal year shall be greater than or equal to the target benchmark by the last day of the fiscal year. |

| Original Definitions | Clarified Definitions |
|---|---|
| **Housing Choice Program (Section 8)** | **Housing Choice Program (Section 8)** |
| **Quality Control Inspections**<br>Annual percentage of previously inspected units (initial or renewal inspection) that will be inspected again for quality control purposes. | **Quality Control Inspections**<br>The percent of quality control inspections on units inspected directly by AHA during the fiscal year shall be greater than or equal to the target benchmark. |
| **Community and Supportive Services** | **Community and Supportive Services** |
| **Resident Homeownership**<br>Annual number of Public Housing or Housing Choice residents who close on purchasing a home. | **Resident Homeownership**<br>The number of Public Housing residents, Housing Choice Voucher participants, and other income eligible families who close on purchasing a home during the FY, regardless of participation in a homeownership counseling program, shall be greater than or equal to the target benchmark. |
| **Resident Workforce Participation**<br>Annual number of Public Housing or Housing Choice heads of households (excluding elderly and disabled) who are in the workforce. | **Household Work/Program Compliance**<br>The annual percentage of Public Housing and Housing Choice assisted households that are Work/Program compliant (excluding elderly and disabled members of the households) through the last day of the FY shall be greater than or equal to the target benchmark. **(See Note D below)** |
| **Finance** | **Finance** |
| **Project –Based Financing Closings**<br>Annual number of properties refinanced using project based financing demonstration principles. | **Project –Based Financing Closings**<br>The annual number of projects in which AHA will commits project-based vouchers and/or make an investment of MTW funds. **(See Note E below)** |

**Notes:**

A. **Public Housing Program - General.** Information for the Public Housing Program includes information for both AHA-owned public housing communities and the public housing assisted units at AHA-sponsored mixed-income communities (“Signature Properties”).

B. **Public Housing Program – Occupancy Rates.** Available Units: Units that are defined as dwelling units (occupied or vacant) under AHA’s Annual Contributions Contract (ACC), that are available for occupancy, after adjusting for four categories of exclusions:

1. Units Approved For Non-Dwelling Use: These are units that are HUD approved for non-dwelling status for the use in the provision of social services, charitable purposes, public safety activities, and resident services, or used in the support of economic self-sufficiency and anti-drug activities.
2. Employee Occupied Units: These are units that are occupied by employees who are required to live in public housing as a condition of their job, rather than the occupancy being subject to the normal resident selection process.
3. Vacant Units Approved For Deprogramming: These are units that are HUD approved for demolition/disposition.
4. Temporarily Off-Line Units: Units undergoing modernization and/or major rehabilitation.

**C. Public Housing Program** - % **Planned Inspections Completed.** Units exempted from the calculation for this purpose include the following:

1. Occupied units for which AHA has documented two attempts to inspect the unit and where AHA has initiated eviction proceedings with respect to that unit.
2. Vacant units that are undergoing capital improvements.
3. Vacant units that are uninhabitable for reasons beyond AHA's control due to:
   a) Unsafe levels of hazardous/toxic materials;
   b) An order or directive by a local, state or federal government agency;
   c) Natural disasters; or
   d) Units kept vacant because they are structurally unsound and AHA has taken action to rehabilitate or demolish those units.
4. Vacant units covered in an approved demolition or disposition application.

**D. Housing Choice Budget Utilization.** AHA's MTW Housing Choice Budget Utilization benchmark requires that the expenditure of fiscal year Housing Choice Annual Budget allocation for MTW vouchers utilized for MTW eligible activities be greater than or equal to the target benchmark of 98%. In its FY 2007 Implementation Plan, AHA added clarifying language for this benchmark. As part of the FY 2008 Implementation Plan, AHA has included further clarifying language that the 98% expenditure rate only applies to vouchers that are fully funded during AHA's entire fiscal year, and that any new vouchers received intermittently during the fiscal year are excluded from the 98% requirement until the following fiscal year until such time that a 12-month period has elapsed. AHA is making this clarification in light of changes that HUD has made in funding vouchers based on a calendar year versus a fiscal year.

**E. Community and Supportive Services – Household Work/Program Compliance.** This benchmark is further clarified to align the previous Resident Workforce Participation benchmark with measuring resident and participant compliance with AHA's Work/Program Compliance policy. Since the execution of AHA's MTW Agreement, the agency has implemented a Work/Program Compliance policy requiring one adult (age 18-61, excluding elderly and disabled persons) in the household to work full-time at least 30 hours per week and all other adults in the household to be either work or program compliant (see table below for compliance meanings).

| CATALYST Compliance Meanings | |
|---|---|
| Full-time Worker | • Employed for 30 or more hours per week |
| Participation in an approved program | • attending an accredited school as a "full-time" student<br>• participating in an approved "full-time" training program<br>• attending an accredited school as a "part-time" student, AND successfully participating in an approved "part-time" training program |
| Part-time Job and Part-time Program Participant | • Employed as a part-time employee (at least 16 hours) AND successfully participating in an approved training program<br>• Employed as a part-time employee (at least 16 hours) AND successfully participating in an accredited school as a "part-time" student |

The following timelines apply to AHA's Work/Program Compliance requirements:

*12/31/05:* 1 target adult in the household to be work/program compliant

*6/30/06 and thereafter:* 1 target adult in the household to be work compliant and all other adults in the household to be either work or program compliant

**D. Finance – Project-based Financing Closings.** This benchmark is further clarified with measuring AHA's progress in facilitating the creation of healthy mixed-income communities owned by private entities by committing project-based vouchers to a percentage of the units and/or investing MTW funds to promote or support the development or rehabilitation of housing units that are affordable to low-income families.

Measurable Outcomes. Attachment D of AHA's Moving to Work (MTW) Agreement also includes measurable outcomes for each of the eleven benchmarks defined above. AHA is revising the measurable outcomes based on lessons learned during the MTW Agreement period and to align better measurements with the clarified definitions indicated above. As a result and as reflected in the table below, the measurable outcomes for the following program measures have been revised: (1) Household Work/Program Compliance, and (2) Project-based Financing Closings.

**MTW Program Benchmarks – Measurable Outcomes**

| Measurable Outcome | Baseline | Yr1 FY04 | Yr2 FY05 | Yr3 FY06 | Yr4 FY07 | Yr5 FY08 | Yr6 FY09 | Yr7 FY10 |
|---|---|---|---|---|---|---|---|---|
| **Public Housing Program** | | | | | | | | |
| % Rents Uncollected | 2% | ≤2% | ≤2% | ≤2% | ≤2% | ≤2% | ≤2% | ≤2% |
| Occupancy Rate **(See Note A below)** | 98% | ≥98% | ≥98% | ≥98% | ≥98% | ≥98% | ≥98% | ≥98% |
| Emergency Work Orders Completed or Abated in < 24 Hours | 99% | ≥99% | ≥99% | ≥99% | ≥99% | ≥99% | ≥99% | ≥99% |
| Routine Work Orders Completed in < 7 Days | 5 Days | 100% | 100% | 100% | 100% | 100% | 100% | 100% |
| % Planned Inspections Completed | 100% | 100% | 100% | 100% | 100% | 100% | 100% | 100% |
| **Housing Choice Program (Section 8)** | | | | | | | | |
| Budget Utilization Rate | 98% | ≥98% | ≥98% | ≥98% | ≥98% | ≥98% | ≥98% | ≥98% |
| % Planned Annual Inspections Completed | 98% | ≥98% | ≥98% | ≥98% | ≥98% | ≥98% | ≥98% | ≥98% |
| Quality Control Inspections | ≥1.4% | ≥1.4% | ≥1.4% | ≥1.4% | ≥1.4% | ≥1.4% | ≥1.4% | ≥1.4% |
| **Community and Supportive Services** | | | | | | | | |
| Resident Homeownership | 6 | 35 | 35 | 70 | 85 | 100 | 110 | 120 |
| Household Work/Program Compliance **(See Note B below)** | N/A | N/A | N/A | 55% | 62% | 71% | 74% | 75% |
| **Finance** | | | | | | | | |
| Project-Based Financing Closings **(See Note C below)** | 0 | 6 | 6 | 6 | 6 | 6 | 6 | 6 |
| Investment Deals Involving MTW Funds **(See Note C below)** | 0 | 0 | 0 | 1 | 1 | 1 | 1 | 1 |

**Notes:**

A. **Public Housing – Occupancy Rate.** As discussed under Program Benchmark Definitions, AHA will achieve the measurable outcome for the occupancy rate benchmark after recognizing that certain categories of vacant units will be excluded as described in Note B of the performance measure chart.

In the event that the occupancy rate of an AHA-owned public housing community falls below 93% of the total number of units for a period of twelve (12) consecutive months because of the lack of qualified applicants on the site-based waiting list (that is, after exhausting all marketing attempts during that 12 month period), or in the event that the rents collected plus the available Section 9 subsidy for an AHA-owned public housing community are not sufficient to sustain the property on a cash flow basis at the 93% occupancy level as demonstrated by the audited financial statements for that property, then AHA intends to conduct a viability analysis of the property looking at the following factors:

(i) physical condition;
(ii) obsolescence;

(iii) lack of market interest; and
(iv) cost of upgrading the property to market conditions compared to allowable Total Development Cost Limits.

If the property viability analysis supports such action, AHA would (1) submit a demolition/disposition application and apply for Section 8 vouchers in accordance with applicable regulations, and (2) pursue one of the following strategies:

a. Implement a revitalization strategy for the property;
b. Sell the property and use the proceeds to support or promote affordable housing for low-income families; or
c. Land bank the vacant land for future revitalization or sale, as appropriate.

**B. Community and Supportive Services – Household Work/Program Compliance.** As discussed under Program Benchmark Definitions, this benchmark is further clarified to align the previous Resident Workforce Participation benchmark with measuring resident and participant compliance with AHA's Work/Program Compliance policy. In this regard, AHA has established measurable outcomes for the remaining period of its MTW Agreement. The measurable outcome for Household Work/Program Compliance will exclude from that measurement all non-compliant households that have been notified of non-compliance and the resulting consequence of either lease or program termination, including in-process evictions or program terminations, as applicable.

**C. Finance – Project-based Financing Closings.** As discussed under Program Benchmark Definitions, this benchmark is also further clarified to align to measure AHA's progress in facilitation of the creation of healthy mixed-income communities owned by private entities by committing project-based vouchers and/or investing MTW Funds to promote or support the development or rehabilitation of housing units that are affordable to low-income families.

**HUD Review**

AHA has adopted these clarifications in the absence of any prior HUD notice that they are in direct violation of specific provisions of the MTW Agreement and its Statement of Authorizations.

**THE HOUSING AUTHORITY OF THE CITY OF ATLANTA, GEORGIA**
**MTW AGREEMENT**
**IDENTITY OF INTEREST IMPLEMENTATION PROTOCOL**
**November 2, 2006**

**The Housing Authority of the City of Atlanta, Georgia (AHA) and the United States Department of Housing and Urban Development (HUD) are parties to a Moving to Work Demonstration Agreement (MTW Agreement), effective July 1, 2003. AHA has initiated a new methodology for processing the approval of Identity of Interest (IOI) relationships between the development partner procured by AHA (Development Partner) and the Development Partner's affiliated general contractor in order to carry out construction activities relating to the Mixed Finance Development being implemented by that Development Partner and AHA.**

## *Simplification of the Development and Redevelopment Process*

**Set forth below is an extract from Appendix A (Subsection C) to the MTW Agreement that sets forth AHA's authorization from HUD to implement an alternate means of implementing development measures:**

> "AHA is authorized to develop and adopt reasonable policies and procedures that will allow local conditions to determine and control major development decisions as described below in this Subsection C. AHA may choose to implement its development decisions, policies, procedures and strategies in conjunction or in partnership with AHA Partners to: (i) develop innovative residential and/or retail opportunities; (ii) further AHA's neighborhood revitalization strategies; and/or (iii) further AHA's affordable housing strategies.
>
> As stated in the MTW Agreement, the regulatory requirements of 24 CFR Part 941 shall not apply to the implementation of the activities of AHA except for the provisions of 24 CFR 941.202, 24 CFR 941.207, 24 CFR 941.208, 24 CFR 941.209, 24 CFR 941.602(d), and 24 CFR 941.610(b) all as modified by the terms of this MTW Agreement; provided, however, that in determining the location of six or more newly constructed or substantially rehabilitated units or developments, the AHA is authorized to adopt the alternative Site and Neighborhood Standards set forth in Section VI.B.3 herein. AHA and HUD agree that AHA may certify to HUD that it has met HUD site selection requirements. AHA agrees to use its HOPE VI funds for eligible HOPE VI activities and its MTW funds for eligible activities under the MTW Agreement. HUD and AHA agree to follow the terms and provisions of the Development Process Protocol, a copy of which is attached hereto as Attachment D and incorporated into this MTW Agreement by this reference.
>
> As stated in Section 1, General Conditions, any authorizations and regulatory relief granted to AHA pursuant to this MTW Agreement will inure to the benefit of AHA Partners with respect to MTW

eligible activity, and HUD hereby agrees to the amendment of any and all evidentiaries necessary to implement the least restrictive regulatory requirements allowable."

**HUD Regulatory Requirements**

HUD regulations at 24 CFR §941.606(n) contemplate that public housing authorities (PHA) shall submit to HUD certifications and assurances that warrant that the PHA shall ensure that (i) its selected Development Partner will use an open and competitive process in its selection of entities to assist in the development (*941.606(n)(1)(ii)(A))*, and (ii) if such Development Partner (or any other entity with an identity of interest with such party or parties) wants to serve as the general contractor for the development, it may award itself the construction contract only if it can demonstrate to HUD's satisfaction that its bid is the lowest submitted in response to a public request for bid (*941.606(n)(1)(ii)(B))*.

In accordance with the terms of the MTW Agreement, the regulations at 24 CFR §941.606 are not applicable to AHA. This Identity of Interest Implementation Protocol will serve to implement the regulatory relief granted by HUD to AHA under the MTW Agreement.

## AHA Implementation Protocol for IOI Review and Approval

AHA and the Development Partner procured for the applicable mixed-finance development shall follow the following procedures to satisfy the requirements of 24 CFR §941.606(n):

1. The Development Partner is to submit its determination and recommendation to AHA that based on market conditions and other factors set forth below, such Development Partner or an affiliate of such Development Partner proposes to serve as the general contractor for the subject development without a competitive bid process.

2. The Development Partner will include with such submission the following documentation:

    a. An independent cost estimate prepared by an experienced third party construction estimator, hired by the Development Partner or affiliated entity, that includes (i) a detailed cost estimate representing the total costs in Construction Specifications Institute (CSI) Master Format Division (including work descriptions, quantities, unit costs, contingency, overhead/profit, etc.) for the subject construction, and (ii) a signed and dated certification that such cost estimate represents reasonable construction costs for the type of work indicated for projects in the City of Atlanta region; and

b. A detailed final construction budget prepared by the Development Partner or affiliated entity for the subject construction, including a Schedule of Values in CSI Master Format Division (including work descriptions, quantities, unit costs, contingency, overhead/profit, etc.).

3. Based on an objective analysis of the construction market factors existing at the time, the Development Partner will represent to AHA that:

   a. The construction market in the City of Atlanta is sufficiently busy such that contractors have a substantial amount of work and clients to manage and that in such a market there is a high risk to developers that are bound by construction completion and stabilization dates;

   b. The construction market in the City of Atlanta includes a substantial number of contractors that lack familiarity with Davis Bacon and Section 3 requirements and the complexities of the documentation and funding draw processes associated with mixed finance revitalization projects;

   c. In order to meet construction completion schedules required by HUD in a timely manner for the revitalization project in question, it is not practicable for the Development Partner and/or affiliate to initiate a public request for bids due to certain time constraints and the volume of construction activity in the local market; and

   d. Includes a discussion of any other factors relating to the construction market and/or the subject development phase that are relevant to making a determination of the Development Partner's request.

4. A qualified AHA construction estimating consultant reviews the independent cost estimate and the final construction budget and makes a written determination, signed by the consultant, that (i) the final construction budget is in a reasonable amount comparable to the costs that would be obtained through competitive bidding, including a discussion of factors such as the comparison of the amount of the final construction budget versus the independent cost estimate and any other applicable objective factors that would ensure a determination in the best interests of AHA and the proper use of Public Housing Funds, (ii) the final construction budget is below the Total Development Cost limit pursuant to PIH Notice 2006-22, and (iii) the fees in the final construction budget are at or below HUD's Cost Control and Safe Harbor Standards (General Conditions – 6 percent, Builders Profit – 6 percent, and Builders Overhead – 2 percent) (collectively the AHA Construction Consultant Determination).

5. The AHA project manager of the Real Estate Development and Acquisition Department (REDA), with concurrence of the Senior Vice President, REDA (SVP), shall independently review the Development

Partner's submission, including independent cost estimate and final construction budget, and the AHA Construction Consultant Determination. The project manager will present a brief written memorandum to the President and Chief Executive Officer (President/CEO), signed by the SVP, including all applicable documents attached thereto, that recommends approval of the Development Partner's request.

6. The President/CEO shall review the entire package presented by the SVP and make a final determination, signed by the President/CEO, with respect to approving or disapproving of the Development Partner's request. The Development Partner shall be timely informed of the President/CEO's determination in writing.

7. Upon the President/CEO approval of the Development Partner's request, the President/CEO shall submit a certification to HUD, in the form attached hereto, as part of the mixed finance evidentiary documents in conjunction with the closing associated with the applicable development phase, signed by the President/CEO, which warrants that the Protocol items one through six above were followed. The certification will include as attachments the documents referenced in Protocol items one through six above.

**HUD Review**

AHA has adopted this protocol in the absence of any prior HUD notice that it is in direct violation of specific provisions of the MTW Agreement and its Statement of Authorizations.

CERTIFICATION REGARDING THE
MTW AGREEMENT
IDENTITY OF INTEREST IMPLEMENTATION PROTOCOL

Pursuant to the provisions of the Moving to Work Demonstration Agreement between the United States Department of Housing and Urban Department (HUD) and The Housing Authority of the City of Atlanta, Georgia (AHA), effective July 1, 2003, I certify that prior to AHA's approval of ______________________________ to serve as the general contractor in the development of _______________________________________ that the MTW Agreement Identity of Interest Implementation Protocol (Protocol) items one through six were followed in accordance with the terms of such Protocol. This certification is based on the supporting documentation attached hereto, which are identified in the Protocol.

_____________________________________________ ____________________

Renée Lewis Glover                                                    Date
President and Chief Executive Officer
The Housing Authority of the City of Atlanta, Georgia

**THE HOUSING AUTHORITY OF THE CITY OF ATLANTA, GEORGIA (AHA)**
**MTW AGREEMENT**
**OBLIGATION AND EXPENDITURE OF CAPITAL FUNDS PROTOCOL**
**October 2, 2006**

The Housing Authority of the City of Atlanta, Georgia (AHA) and the United States Department of Housing and Urban Development (HUD) are parties to a Moving to Work Demonstration Agreement (MTW Agreement), effective July 1, 2003. The MTW Agreement relieves AHA of the requirement to comply with the United States Housing Act of 1937 (a few exceptions apply) as amended, a number of HUD regulations, notices and other guidance to the extent necessary to implement AHA's Moving to Work Program. Among the requirements from which AHA is exempt are the provisions under Section 905.10 and 905.120 of 24 CFR Part 905. These two sections are HUD's implementing regulations for section 9(j) of the United States Housing Act of 1937, which deals with the obligation and expenditure of Capital Fund Program funds by public housing agencies. This protocol highlights the provisions within the MTW Agreement that provide AHA exception from these regulations. Annotations to the provisions are italicized.

**EXTRACTS AND ANNOTATIONS OF THE**
**MOVING TO WORK DEMONSTRATION AGREEMENT**

ARTICLE I. HUD Program Requirements and Other Federal Requirements.

A. **This Agreement supersedes the terms and conditions of the ACCs and the provisions of the United States Housing Act of 1937, as amended (the "1937 Act") and HUD requirements to <u>the extent necessary for the Agency to implement its MTW demonstration, as approved by HUD in this Agreement.</u>** All authorizations contained in this Agreement are for the length of the demonstration only, unless otherwise specified**. Except as necessary to implement the Agency's activities described in the Statement of Authorizations, the Agency is subject to the requirements of the ACCs, the 1937 Act, and other HUD requirements.** Notwithstanding anything in this Agreement, the following provisions of the 1937 Act, as otherwise applicable, shall continue to apply to the Agency and/or assistance received pursuant to the 1937 Act:

***(Appendix A, V (A) Single Fund Budget with <u>Full Flexibility</u>, establishes that***
***AHA may combine its public housing operating subsidies and public housing capital funds, and its Housing Choice program assistance into a single, authority-wide funding source ("MTW Funds"). AHA may use this funding source to carry out the purposes of the MTW Program as defined in the Agreement V.(A)(2)(a-g). The limitations of 9(j) could not be applied and at the same time allow for the existence of the MTW Funds and the approved purposes – i.e. any funds used for any MTW purpose. )***

**B.** To the extent described in the Statement of Authorizations, as applicable and as approved by HUD, the **Agency may combine operating subsidies provided under Section 9 of the 1937 Act (42 U.S.C. 1437g), capital funding (including development and replacement housing factor funds) provided under Section 14 of the 1937 Act (42 U.S.C. 1437l) and assistance provided under Section 8 of the 1937 Act for the voucher programs (42 U.S.C. 1437f) to fund HUD approved MTW activities.**

**D. The Agency agrees to comply with HUD requirements governing the MTW program. Such HUD requirements include, but are not limited to management, financial, accounting, or other requirements designed to adequately track and monitor the Agency's use of HUD assistance. Notwithstanding other provisions of this Agreement, the Agency will be required to submit reports and financial statements as necessary in forms prescribed by HUD.**

**E.** The Agency agrees to cooperate fully with HUD and its contractors in the monitoring and evaluation of the MTW demonstration, to keep records and to submit reports and information to HUD as required of PHAs participating in the MTW program. Except as otherwise provided in this Agreement**, the Agency shall submit an Annual Plan and Report as required by Section 5A of the 1937 Act, which shall include a separate section fully describing activities and uses of funding the Agency is undertaking through the MTW demonstration.**

***(The MTW Annual Plan and Report are the form of reporting required by the Agreement – also see A.V.(A)(4&5) and VII.(A)(1,2,3) )***

G. Any HUD assistance that the Agency is authorized to use in the MTW demonstration must be used in accordance with the Agency's HUD-approved Statement of Authorizations (Appendix). The Agency hereby certifies that the Agency's governing board has approved this Agreement, and that a copy of such board approval has been provided to HUD.

**APPENDIX A TO THE**
**MOVING TO WORK DEMONSTRATION AGREEMENT**

Statement of Authorizations

*I. General Conditions*

____________

F. The purpose of the Statement of Authorizations is to delegate to AHA the authority to pursue locally driven policies, procedures and programs with the aim of developing better, more efficient ways to provide housing assistance to low and very-low income families. Therefore, except as otherwise provided in this Agreement, **all authorizations granted in the Statement of Authorizations are intended to have been granted fully without requiring any additional HUD authorizations and approvals.**

_____________

I. HUD shall appoint a liaison as a single point of contact to represent HUD implementing this Agreement. HUD shall provide written notice of its appointed liaison within thirty (30) days of executing this Agreement.

_____________

V. **Funding Issues**

**A. Single Fund Budget with Full Flexibility**

1. Pursuant to Article I.B. of the MTW Agreement, **AHA may combine its public housing operating subsidies and public housing capital funds, and its Housing Choice program assistance into a single, authority-wide funding source ("MTW Funds").** The funding amount for the MTW Funds may be increased by additional allocations of housing choice vouchers to which AHA is entitled to over the term of the Agreement. Special purpose vouchers will not be included in the MTW Funds during their initial term, though some may be included in the MTW Funds upon renewal.

2. **AHA may use this funding source to carry out the purposes of the MTW Demonstration Program to provide flexibility in the design and administration of housing assistance to eligible families, to reduce cost and achieve greater cost effectiveness in Federal expenditures, to give incentives to families with children where the head of household is working, seeking work, or is preparing for work by participating in job training, educational programs, or programs that assist people to obtain employment and become economically self-sufficient, and to increase housing choices for low-income families, through, but not limited to, the following activities:**

a. **Provision of Capital funds or operating assistance to housing previously developed or operated pursuant to a contract between HUD and AHA or newly acquired or developed pursuant to section b below.**

b. **The acquisition, new construction, reconstruction or moderate or substantial rehabilitation of housing (including, but not limited to, assisted living, or other housing as deemed appropriate by AHA, in accordance with its mission), or commercial facilities consistent with the objectives of the demonstration. Such activities may include but are not limited to real property acquisition, site improvement, development of utilities and utility services and energy efficiency systems, conversion, demolition, financing, administration and planning costs, relocation and other related activities;** provided, however, that prior HUD approval is required for the development of any incremental public housing units.

**c. The provision of housing or employment-related services, such as housing counseling in connection with rental or home ownership assistance, energy auditing, activities related to the provision of self-sufficiency and other services, employment counseling, education, training and other services related to assisting tenants, owners, contractors, and other persons or entities participating or seeking to participate in other housing or training and educational activities assisted pursuant to this section.**

**d. The provision of management services, including preparation of work specifications, loan processing, inspections, tenant selection, management of tenant and project-based rental assistance and management of housing projects or other facilities or operations developed under this program.**

**e. The provision of safety, security, and law enforcement measures and activities appropriate to protect residents of housing from crime.**

**f. The provision of Housing Choice Program assistance or project-based rental assistance, alone or in conjunction with other private or public sources of assistance.**

**g. The preservation of units currently serving people of low income or the acquisition and/or development of new units for people of low income, provided that all rehabilitation and construction is done in accordance with the requirements of Section 504 of the Rehabilitation Act and where applicable, the design and construction requirements of the Fair Housing Act.**

4. AHA's expenditures must comply with OMB Circular A-87, which provides basic guidelines for the use of federal funds, and with this MTW Agreement**. Program-specific funding regulations governing allowable expenditures are suspended to the extent they are inconsistent with this MTW Agreement.** ***(See 3.a-g for allowable uses of all MTW funds – allowable uses substantially greater than permitted under CFP or RHF regs.)***

5. AHA may use capital funds (including development and replacement housing factor funds) **from fiscal years prior to its fiscal year 2004** in accordance with this Agreement and subject to section 9(j) of the Act, as amended by the FY 2003 Omnibus Appropriations Act or any subsequent Appropriations Act.
***(The only reference to application of 9(j in the agreement), applies only to funds from fiscal years prior to 2004)***

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**B. Funding Methodology**

***C.*** **During the term of the MTW Demonstration Program, HUD will provide AHA with public housing operating subsidies and capital funds, and with Housing Choice Program assistance as provided in Attachment A. (*****This attachment states- "All funds programmed for MTW purposes will be recorded and drawn down from MTW-designated line items on relevant HUD forms." Again no mention of 9(j) requirements)***

**C. Funding Disbursements**

AHA will receive its funding in accordance with the following disbursement requirements: …………

**2. Capital Funds**

**a. The Capital funds determined in accordance with <u>Attachment A</u> will be disbursed in accordance with standard HUD procedures for the disbursement of public housing Capital funds. (*****Attachment A provides that formula and grant amount in accord w/ regulations – funds to be drawn as MTW funds. No mention of 9(j))***

b. **In requisitioning these funds, AHA will not be required to provide line item detail, but will request the funds using a <u>single MTW line item</u>; provided, however, that the AHA may not accelerate draw downs of funds in order to fund reserves.**

c. **<u>AHA may use these funds for any eligible MTW activity consistent with this MTW Agreement.</u>**
***(Funds may be combined (fully fungible) and used for any MTW purpose. See V. (2)(a-g))***

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## VII. Administrative Issues

### A. AHA Annual MTW Plan and Annual MTW Report

*1.* During the term of the MTW demonstration, in lieu of the five (5) year plan and annual plan required by Section 5A of the 1937 Act, as amended, AHA will prepare and **will conduct its activities in accordance with an Annual MTW Plan and Annual MTW Report. The Annual MTW Plan will serve as a comprehensive framework for AHA's activities, including resource allocation decisions,** and will be submitted to HUD for its review annually, no later than 60 days prior to the start of AHA's fiscal year (except that in the first year of the MTW Demonstration Program it will be submitted within a reasonable period of execution of this MTW Agreement)………. ***(Annual MTW Plan and Report governing documents regarding mandatory reporting)***

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*2.* AHA will prepare an Annual MTW Report, including a Consolidated Financial Report describing the sources and uses of funds under this MTW Agreement, which will compare the Agency's performance with its Annual MTW Plan. The Annual MTW Report will provide the information necessary for HUD to assess AHA's performance, in both regular operations and in activities authorized by the MTW Demonstration Program. **Except as otherwise provided in this MTW Agreement, the Annual MTW Report will take the place of all other conventional HUD performance measures<u>. All HUD forms and other reporting mechanisms, including any required certifications, will, where appropriate, be included in either the Annual MTW Plan or the Annual MTW Report, and will not be submitted to HUD at other times during the year.</u>** However, **HUD reserves the right to conduct independent physical inspections of AHA property and to require submission of any other information required by law or for sound administration of the program.** The Annual MTW Report will be submitted……… ***(Annual MTW Plan and Report governing documents regarding mandatory reporting)***

3. The submission of AHA's Annual MTW Plan and Annual MTW Report and the timely submission of other reports as specified in Attachment E will **satisfy all program-based reporting requirements** applicable to the receipt of public housing operating subsidies and Capital funds and/or Housing Choice Program funds, subject to Attachment A and any future Appropriations requirements which may be enacted.
***(Attachment E deals with the Compliance Supplement Reports – which have been established for HOPE VI and the Capital Fund. This statement waives all program based reporting other than the MTW Plan and Report and the Compliance Supplements)***

## C. Simplification of the Development and Redevelopment Process

As stated in the MTW Agreement, the regulatory requirements of 24 CFR Part 941 shall not apply to the implementation of the activities of AHA except for the provisions of 24 CFR 941.202, 24 CFR 941.207, 24 CFR 941.208, 24 CFR 941.209, 24 CFR 941.602(d), and 24 CFR 941.610(b) all as modified by the terms of this MTW Agreement; provided, however, that in determining the location of six or more newly constructed or substantially rehabilitated units or developments, the AHA is authorized to adopt the alternative Site and Neighborhood Standards set forth in Section VI.B.3 herein. AHA and HUD agree that AHA may certify to HUD that it has met HUD site selection requirements**. AHA agrees to use its HOPE VI funds for eligible HOPE VI activities and its MTW funds for eligible activities under the MTW Agreement**. HUD and AHA agree to follow the terms and provisions of the Development Process Protocol, a copy of which is attached hereto as Attachment D and incorporated into this MTW Agreement by this reference.
***(Applicability of HOPE VI requirements only specific set aside besides environmental, Davis Bacon, and demolition/ disposition.)***

*3.* To satisfy the closing, underwriting and diligence requirements of other development or acquisition transaction participants, HUD will, within 3 business days of AHA's request, provide to AHA any reasonable documentation affirming the terms of the MTW Agreement, including confirmation of **AHA's authority to close mixed-finance transactions during the term of the MTW Demonstration Program without HUD's approval.** HUD will agree to execute, after satisfactory legal review, such other documents as may be necessary to close mixed-finance or acquisition transactions, as provided above***. (Such approval would by its nature include the funds and use of funds involved in the Mixed Finance deal.)***

**2. Capital Fund Program**

**A. The PHA's formula characteristics and grant amount will continue to be calculated in accordance with applicable law and regulations.**

B. For capital funds (including development and replacement housing factor funds) provided in years prior to the execution of this Agreement, the PHA may submit, and HUD will approve, as permitted by law, a request to reprogram, by grant year, any unobligated funds for eligible MTW purposes. Such requests will be made in accordance with current procedures governing amendments to the Annual Plan, except that no public consultation will be necessary prior to submission of the request.

**D. All funds programmed for MTW purposes will be recorded and drawn down from MTW-designated line items on relevant HUD forms.**
***(This includes Capital funds. Relevant forms not defined – assume these to be the ACCs to be executed when MTW Funds are drawn from operating funds, capital funds, etc. Procedure would be to designate amount of total funds to be drawn for FY and enter on line designated as MTW Funds.)***

**Attachment C**
**Development Process Protocol**

**1. Points of Contact**

AHA and HUD have identified Eugene Geritz to serve as the HUD point of contact for AHA to facilitate and provide assistance for all real estate development related activities and transactions, including, without limitation, all mixed-finance development transactions, homeownership plans and transactions, acquisition plans and transactions and related HOPE VI reviews. AHA and HUD have further identified Dhoya Bentley in the Atlanta Regional office of HUD to serve as the primary legal contact for all such activities and transactions. In the event that Mr. Geritz or Ms. Bentley is no longer available to serve in this capacity, AHA and HUD will identify a replacement point of contact.

3. **Mixed Finance Transactions**

**AHA is authorized to close mixed-finance transactions without further HUD approval. Plans for such closings will be included in the Annual MTW Plan and evidence of the consummation thereof is included in the next Annual MTW Report. In lieu of the development proposal and rental term sheet, AHA will provide the following documentation solely for informational purposes: *(A Mixed Finance Protocol has been adopted to clarify this procedure)***

a. For information purposes, no later than 30 business days prior to the proposed closing of the mixed-finance transaction, AHA will provide HUD a transaction summary memo (the "Transaction Summary Memo") to HUD. The Transaction Summary Memo will include a brief narrative which will describe (i) the proposed development, including type of units, number of units and unit mix, (ii) the surrounding neighborhood and other ongoing or planned revitalization activity in the area, (iii) the development project participants, including financing participants, their role and the type and amount of financing to be provided such participants and (iv) a final budget and sources and uses. AHA will also be responsible for conducting due diligence in connection with the mixed-finance transaction. AHA will share the results of its due diligence with HUD upon request when the Mixed-Finance Post-Closing Memo is transmitted to HUD. AHA acknowledges and agrees that a Part 50 or Part 58 Environmental Review must be completed before HUD can release funds. HUD will insure that the requested funds are set up in LOCCS within 2 business days of faxing a written request to Mr. Geritz.

c. In connection with each closing, AHA shall prepare and deliver to HUD, and HUD and AHA shall execute a Mixed-Finance Amendment to the Consolidated Annual Contribution Contracts. AHA will also prepare and execute a certificate regarding certain compliance requirements. HUD and AHA will agree upon the form, which will become Exhibit 1 to the MTW Agreement

d. AHA will submit a copy of all evidentiaries associated with the closing described in the Transaction Summary Memo no later than 30 business days following the closing.

**4. Model Documents**

AHA will identify and submit to HUD's points of contact for AHA, a model set of regulatory and loan agreements that incorporate HUD's critical statutory and policy requirements for affordability and operations, based on evidentiary documents which have been used by AHA and approved by HUD in one or more prior closings. HUD agrees that these documents may be used as a model in subsequent project financing efforts and may be modified to reflect the terms and provisions of specific transactions and that no further approval of the documents will be required.

**5. Other Documentation**

AHA and HUD acknowledge that HUD may, from time to time, request other information in connection with AHA's development and revitalization activities. AHA agrees to cooperate with HUD to provide the information requested; however, both AHA and HUD agree that such information shall be provided for review only and not for approval.

**ATTACHMENT E**

## AHA MTW Program Compliance Requirements

### 1. INTRODUCTION

**……….** Compliance supplements to the A-133 provide specific program compliance guidance by major program as defined by OMB. As MTW is a demonstration program, no specific guidance exists for MTW as a major program. Follows is the specific compliance guidance for which AHA as a Moving to Work agency will be audited for program compliance. ***(Compliance supplements have been adopted for the Capital Fund and HOPE VI.)***

There are three primary funding sources for which the AHA would draw Federal funds under the Moving to Work Agreement. Correspondingly, **these primary funding sources will be consolidated into one MTW Block Grant for compliance review and audit by the IPA**. Funds are made available to achieve and maintain adequate operations, maintenance services, reserve funds, capital improvement funds, and asset management fees for public housing units and contract administration fees and rental assistance for housing voucher program units leased from the private market. **The three funding sources are: Public Housing Performance Funding Subsidy, Housing Choice Voucher Program (HCVP)(Section 8) and Capital Program Funding. (Compliance with the MTW program assumes no differentiation between funding streams, except where specifically noted in the Agreement. Compliance is based on program performance and eligibility requirements as defined in the MTW Agreement and/or MTW Annual Plan.)**

**(The Agreement does not differentiate between the income streams. There is no specific reference in the Agreement, Appendix or Attachments to conformance with the provisions of 9(j), nor to any required program based reporting. In fact it would be impossible to conform to 9(j) and have an MTW "single fund")**

### *III. PERFORMANCE REPORTING*

Performance reporting for AHA's assisted housing is solely determined in the Moving to Work Agreement, which provides for reporting criteria and evaluation of the effectiveness of program objectives.

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**C. Reporting**

**1. Financial Reporting**

a Annual Financial Data Schedule, which includes the entire operations of AHA, is included in the audit report and opined upon by the IPA.

b. MTW Annual Report

c. HUD-52837, *Annual Statement/Performance and Evaluation Report* (*OMB No. 2577-0157*) - At the end of the Capital Grant program year AHA reports total actual cost for each grant with a separate Capital Grant Number for which funds are still being expended in a single MTW line.

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**Applicable Documents:**

- OMB A-133, Single audit act and this MTW compliance supplement.
- Code of Federal Regulations, Title 24 as pertaining to calculations and funding and as specified in the Moving to Work Agreement.
- Federal Registers issued in regards to Title 24 as pertaining to calculations and funding and as specified in the Moving to Work Agreement.
- September 1, 1998, Federal Register, Uniform Financial Reporting Standards for HUD Housing Programs. This requires accounting procedures in accordance with Governmental Accounting Standards Board and the Financial Accounting Standards Board.
- October 1, 1999, Federal Register, Notice of Obsolete Housing Documents. The guidebooks are for information only and are not intended to be regulatory. For example the Low-Rent Housing Accounting Guidebook, suggests a standard chart of accounts. However, the implementation of the GAAP accounting requirements added to the standard chart of accounts. The account numbers are not significant, but the description and purpose as relating to the FDS is significant.
- Public Law 104-134, April 26, 1996 outlines the requirements for the MTW designation. Each agency "shall require 75 percent of the families assisted by participating demonstration public housing authorities shall be very low-income

families as defined by the Housing Act." The eligibility requirements would need to be audited for compliance, in determining whether the program objectives are meet.

- The Public Law 104-134, also requires an annual report or series of reports. Due to the fact that the auditor must determine compliance with program objectives, and that preparation of the Management Discussion and Analysis is required by the GASB 34, the entire audit package can be used as the reporting package. The standard financial statements, the FDS, the required supplemental information, the requested supplemental information and the MD & A must be included in the reporting package. The objectives and outline of the audit reporting package could be tailored to meet these reporting requirements.

**The main objective of the auditor will be to audit compliance with the annual plan and operating budget. General agency administration compliance and audit requirements are considered in the general audit approach as defined in OMB A-133 and in accordance with** the MTW agreement and/or MTW annual plan**. General agency administration includes such areas as: financial management, Davis-Bacon compliance, procurement, property acquisition, eligibility, and allowable cost principles.**

**HUD Review**

AHA has adopted this protocol in the absence of any prior HUD notice that it is in direct violation of specific provisions of the MTW Agreement and its Statement of Authorizations.

THE HOUSING AUTHORITY OF THE CITY OF ATLANTA, GEORGIA (AHA)
MTW AGREEMENT
ALTERNATE RESIDENT SURVEY PROTOCOL

**The Housing Authority of the City of Atlanta, Georgia (AHA) and the United States Department of Housing and Urban Development (HUD) are parties to a Moving to Work Demonstration Agreement (MTW Agreement), effective July 1, 2003. AHA has initiated a new methodology for conducting the annual resident satisfaction survey.**

## *MTW Agreement Reference*

**In accordance with the provision of the MTW Agreement's Statement of Authorizations, Section VII.A and Attachment B (Section IX), AHA may use the Alternate Resident Survey, and protocols for implementing such a survey, in lieu of current HUD standards, during the term of the MTW Agreement. The Alternate Resident Survey will satisfy HUD's requirement for the results for the latest Public and Indian Housing Assessment System (PHAS) Resident Survey, and as required in Attachment B of the MTW Agreement, must be included in the Annual MTW Report.**

## AHA Protocol for Alternate Resident Survey Implementation

As reflected in its FY 2005 Annual Moving to Work (MTW) Plan, AHA is exercising its MTW relief to administer an Alternate Resident Survey to monitor and assess the customer service performance of AHA and its private partners in delivering services to its clients. AHA believes that the alternate survey is simpler for its clients to understand and complete. However, the alternate survey still allows AHA to effectively monitor its performance in critical property management areas. AHA has its Alternate Resident Survey administered by a third party on an annual basis and submits the results in its Annual MTW Reports to HUD by September 1st each year of its MTW Agreement period.

### HUD Review

HUD approved AHA's use of its Alternate Resident Survey on February 4, 2005.

## THE HOUSING AUTHORITY OF THE CITY OF ATLANTA, GEORGIA (AHA)
## MTW AGREEMENT
## PROGRAM FLEXIBILITY FOR NON-MTW BLOCK GRANT VOUCHERS PROTOCOL

**The Housing Authority of the City of Atlanta, Georgia (AHA) and the United States Department of Housing and Urban Development (HUD) are parties to a Moving to Work Demonstration Agreement (MTW Agreement), effective July 1, 2003. AHA requested HUD clarification that MTW program flexibility applies to non-MTW Block Grant Vouchers.**

### MTW Agreement Reference

In accordance with Article VI., Section A. of the Statement of Authorizations, AHA is authorized to create its own Housing Choice Program.

### Program Flexibility for Non-Block Grant Vouchers

During the first quarter of 2005, AHA staff was advised by Jennifer Guthart Powers to clarify that full program flexibility applies to vouchers which are not funded through the Moving to Work (MTW block grant). This issue was raised when AHA sought clarification from Ms. Powers as to whether AHA should have a SEMAP review for the non-block grant funded vouchers. In the email, Ms. Powers noted that all of the vouchers are part of the demonstration, to a certain extent. In a subsequent email on 50058 transmissions, Ms. Powers noted that non-block grant vouchers should not be called non-MTW vouchers because they are still covered by the Agency's demonstration authority.

### HUD Review

As discussed above, Jennifer Guthart Powers clarified that AHA's MTW program flexibility applies to non-MTW Block Grant Vouchers.

## USE OF MTW FUNDS PROTOCOL

AHA intends to use its Moving to Work (MTW) authority to invest, through grants or loans, MTW Funds in residential properties owned by private entities in order to facilitate the creation of mixed-income communities by promoting and supporting the development and rehabilitation of housing units that are affordable to low-income families. These properties will not be subject to an Annual Contributions Contract (ACC) between AHA and the United States Department of Housing and Urban Development (HUD) nor will they be subject to a Declaration of Trust in favor of HUD. Loans made by AHA will be secured by a mortgage which will be recorded against the property based on the priority of AHA's loan in a given transaction, and any grant will be subject to a grant agreement setting forth any applicable use restrictions imposed by AHA. Properties in which AHA invests will typically receive the benefit of low-income housing tax credits and the long-term affordability of the units will be ensured pursuant to a Declaration of Land Use Restrictive Covenants for Low-Income Housing Tax Credits. The affordability of the units for low-income families will be maintained through the provision of project-based vouchers under Section 8 of the 1937 Act for a minimum period of ten years, subject to extension. The requirements applicable to the housing choice voucher program shall be as set forth in the MTW Agreement. This investment flexibility will support AHA's efforts to increase the affordable housing units available to low-income families in the City of Atlanta.

MTW Agreement Reference
U. S. HOUSING ACT OF 1937 – Extracts
**Definitions – Sec 3**
3(a)(1) Dwelling units assisted under this Act shall be rented only to **low-income families** at the time of their initial occupancy of such units.

3(b)(1) The term **"low-income housing"** means decent, safe, and sanitary dwellings assisted under this Act. The term "public housing" means low-income housing, …assisted under this Act other than under section 8.…

3(b)(2) The tem **"low-income families"** means those families whose incomes do not exceed 80 per centum of the median income for the area ….

**Reference – Sec 9**
9(j)(1)(B) .(Obligation date) ..the date on which the agency <u>accumulates</u> adequate funs to undertake modernization substantial rehabilitation, or new construction of units,

MOVING TO WORK AGREEMENT (MTW) - Extracts

The following extracts from the AHA MTW Agreement form the basis for the authorization for AHA to utilize MTW Funds for the financing and development of Project-Based Section 8 developments:

WHEREAS, Section 204(a) of the 1996 Appropriations Act provides that public housing agencies ("PHAs") and the Secretary of the Department of Housing and Urban Development (the "Secretary") shall: have the flexibility to design and test various approaches for providing and administering housing assistance that reduce cost and achieve greater cost effectiveness in Federal expenditures; give incentives to families with children whose heads of household are either working, seeking work, or are participating in job training, educational or other programs that assist in obtaining employment and becoming economically self-sufficient; and **increase housing choices for low-income families; and**

WHEREAS, HUD may permit agencies to combine funds from several HUD programs, and may exempt agencies from existing public and Indian housing and Section 8 voucher rules under Moving to Work Demonstration authority; and

WHEREAS, it is the aim of this demonstration to design and test innovative methods of providing **housing** and delivering services to **low-income families** in an efficient and cost effective manner, HUD and the Agency agree to fully cooperate with each other in order to make the MTW demonstration a success; and

**ARTICLE I. HUD Program Requirements and Other Federal Requirements**.

A. This Agreement supersedes the terms and conditions of the ACCs and the provisions of the United States Housing Act of 1937, as amended (the "1937 Act") and HUD requirements to the extent necessary for the Agency to implement its MTW demonstration, as approved by HUD in this Agreement. All authorizations contained in this Agreement are for the length of the demonstration only, unless otherwise specified. Except as necessary to implement the Agency's activities described in the Statement of Authorizations, the Agency is subject to the requirements of the ACCs, the 1937 Act, and other HUD requirements. Notwithstanding anything in this Agreement, the following provisions of the 1937 Act, as otherwise applicable, shall continue to apply to the Agency and/or assistance received pursuant to the 1937 Act:

1. The terms **"low-income families"** and "very low-income families" shall continue to be defined by reference to Section 3(b)(2) of the 1937 Act (42 U.S.C. 1437a(b)(2));

B. To the extent described in the Statement of Authorizations, as applicable and as approved by HUD, the Agency may combine operating subsidies provided under Section 9 of the 1937 Act (42 U.S.C. 1437g), capital funding (including development and replacement housing factor funds) provided under Section 14 of the 1937 Act (42 U.S.C. 1437l) and assistance provided under Section 8 of the 1937 Act for the voucher programs (42 U.S.C. 1437f) <u>to fund HUD approved MTW activities</u>.

G. Any HUD assistance that the Agency is authorized to use in the MTW demonstration must be used in accordance with the Agency's HUD-approved Statement of Authorizations (Appendix A). The Agency hereby certifies that the Agency's governing board has approved this Agreement, and that a copy of such board approval has been provided to HUD.

H. As required by the 1996 Appropriations Act, the Agency agrees that at least seventy-five percent (75%) of the families assisted by the Agency under the MTW demonstration program will be **very low-income families** as defined in the 1937 Act. The Agency agrees to comply with the requirements of Section 16(a) (3) of the 1937 Act (as amended). The Agency 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. The Agency agrees that housing assisted under MTW will meet housing quality standards established or approved by HUD.

**APPENDIX A. Statement of Authorizations**

**I. General Conditions**

D. Unless otherwise provided in this MTW Agreement, AHA's MTW Demonstration Program applies to all of AHA's public housing assisted units (including AHA owned properties and units comprising a part of mixed-finance, mixed-income communities); tenant based Section 8 assistance (hereinafter referred to as the "Housing Choice Program" ), project-based Section 8 assistance and Homeownership units developed using Section 8 assistance.

F. The purpose of the Statement of Authorizations is to delegate to AHA the authority to pursue locally driven policies, procedures and programs with the aim of developing better, more efficient ways to provide housing assistance to **low and very-low income families**.

Therefore, except as otherwise provided in this Agreement, all authorizations granted in the Statement of Authorizations are intended to have been granted fully without requiring any additional HUD authorizations and approvals.

**V. Funding Issues**

**A. Single Fund Budget with Full Flexibility**

1. Pursuant to Article 1.B of the MTW Agreement, AHA may combine its public housing operating subsidies and public housing capital finds, and its Housing Choice program assistance into a single authority wide funding source ("MTW Funds" )……

2. AHA may use this funding source to carry out the purposes of the MTW Demonstration Program to provide flexibility in the design and administration of housing assistance to eligible families, to reduce cost and achieve

greater cost effectiveness in Federal expenditures, to give incentives to families with children where the head of household is working, seeking work, or is preparing for work by participating in job training, educational programs, or programs that assist people to obtain employment and become economically self-sufficient, and to increase housing choices for low-income families, through, but not limited to, the following activities:

a. Provision of Capital funds or operating assistance to housing previously developed or operated pursuant to a contract between HUD and AHA or newly acquired or developed pursuant to section b below.

b. The acquisition, new construction, reconstruction or moderate or substantial rehabilitation of housing (including, but not limited to, assisted living, or other housing as deemed appropriate by AHA, in accordance with its mission), or commercial facilities consistent with the objectives of the demonstration. Such activities may include but are not limited to real property acquisition, site improvement, development of utilities and utility services and energy efficiency systems, conversion, demolition, financing, administration and planning costs, relocation and other related activities; provided, however, that prior HUD approval is required for the development of any incremental public housing units.

f. The provision of Housing Choice Program assistance or project-based rental assistance, alone or in conjunction with other private or public sources of assistance.

g. The preservation of units currently serving **people of low income** or the acquisition and/or development of new units for **people of low income**, provided that all rehabilitation and construction is done in accordance with the requirements of Section 504 of the Rehabilitation Act and where applicable, the design and construction requirements of the Fair Housing Act.

**(Use of Funds )**

4. AHA's expenditures must comply with OMB Circular A-87, which provides basic guidelines for the use of federal funds, and with this MTW Agreement. Program-specific funding regulations governing allowable expenditures are suspended to the extent they are inconsistent with this MTW Agreement.

5. AHA may use capital funds (including development and replacement housing factor funds) from fiscal years prior to its fiscal year 2004 (?) in accordance with this Agreement and subject to section 9(j) of the Act, as amended by the FY 2003 Omnibus Appropriations Act or any subsequent Appropriations Act.

**C. Funding Disbursements**

**2. Capital Funds**

a. The Capital funds determined in accordance with Attachment A will be disbursed in accordance with standard HUD procedures for the disbursement of public housing Capital funds.

b. In requisitioning these funds, AHA will not be required to provide line item detail, but will request the funds using a single MTW line item; provided, however, that the AHA may not accelerate draw downs of funds in order to fund reserves.

c. AHA may use these funds for any eligible MTW activity consistent with this MTW Agreement.

**3. Housing Choice Program Assistance**

a. Housing Choice Program Funds will be determined in accordance with Attachment A and disbursed in accordance with the standard HUD schedules.

b. AHA may use these funds for any eligible MTW activity consistent with this MTW Agreement.

## VI. Establishment of Housing Choice Program (Tenant Based Section 8)

### B. Simplification of the Process to Project-Base Section 8 Vouchers

4. AHA is authorized to adopt selection criteria for units to be included in its project-based program, and to adopt a local process for determining whether units meet certain eligibility requirements, including, but not limited to:

   b. AHA may determine the type of funds that may be used to rehabilitate or construct units.

   c. AHA may adopt its own procedures to determine whether or not units meet AHA's requirements regarding rehabilitation and construction, including what information is required to be submitted by owners to AHA.

## VII. Administrative Issues

### C. Simplification of the Development and Redevelopment Process

3. AHA is authorized, without further HUD approval, to establish low-income homeownership programs, such as a lease-to-own program, that are not limited by the existing Nehemiah and Section 5(h) program requirements, provided that any disposition of current public housing units must be approved in advance by HUD. Any disposition application will be submitted and processed in accordance with this Agreement.

4. AHA is authorized to enter into commercial business ventures as part of its neighborhood revitalization or affordable housing strategies or other strategies designed to serve as catalysts for revitalization of public housing or surrounding communities.

Good Cause Justification for the waiver of 24 CFR Part 941, except for certain provisions (24 CFR 941.202, 24 CFR 941.207, 24 CFR 941.208, 24 CFR 941.209, 24 CFR 941.602(d) and 24 CFR 941.610(b), as outlined in Section VII.C the Moving to Work (MTW) Agreement.

**Increased Flexibility.** First, this waiver will provide AHA maximum flexibility in the formation and implementation of its development policies, procedures and strategies. AHA intends to use this flexibility to identify additional innovative ways to deliver the **affordable housing resource** in a market rate, mixed-income context for the benefit of AHA's residents and the City of Atlanta. During the MTW demonstration period, AHA intends to evaluate the viability of each of its communities and determine how to reposition those properties to increase the quality of both the housing provided and the surrounding community. The results of the evaluation will likely require AHA to undertake additional community revitalization activities. **AHA intends to explore new financing structures, including structures incorporating project based financing principles, to support this additional activity. The regulatory flexibility provided by this waiver will be a significant component in structuring and implementing any new model.**

**HUD Review**

AHA's HUD-appointed MTW Liaison, Eugene Geritz, approved the Use of Funds clarification in an email to Renée Glover sent on June 30, 2006.

# THE HOUSING AUTHORITY OF THE CITY OF ATLANTA, GEORGIA (AHA)
# MTW AGREEMENT
# FEE FOR SERVICE METHODOLOGY PROTOCOL

**The Housing Authority of the City of Atlanta, Georgia (AHA) and the United States Department of Housing and Urban Development (HUD) are parties to a Moving to Work Demonstration Agreement (MTW Agreement), effective July 1, 2003. As part of Atlanta Housing Authority's (AHA) Moving to Work (MTW) program, the Agency has initiated a new methodology for charging HUD grants and programs administered by AHA.**

**MTW Agreement Reference**

In accordance with the provision of the MTW Agreement's Statement of Authorizations, Section V.A.2, AHA may use its MTW authority and funding flexibility to carry out the purposes of the MTW Demonstration Program including but not limited to reducing cost and achieve greater cost effectiveness in Federal expenditures.

**Fee for Service Methodology**

As part of its Moving to Work (MTW) program, AHA has initiated a new methodology for charging HUD grants and programs administered by AHA. This new methodology uses a fee for service approach to replace the cumbersome salary allocation systems traditionally found in public housing agencies. The fee-for-service approach aligns with the purposes of HUD's MTW program which include "***the flexibility to design and test various approaches for providing and administering housing assistance that reduce cost and achieve greater effectiveness in Federal expenditures.***" Also the Office of Management and Budget (OMB) recognizes the benefits of such an approach and encouraged Federal agencies to explore such alternatives in OMB Circular A-87, "Cost Principles for State, Local, and Indian Tribal Governments," Part A.2.b., which states that:

> Federal agencies should work with States or localities which wish to test alternative mechanisms for paying costs for administering Federal programs. The Office of Management and Budget (OMB) encourages Federal agencies to test fee-for-service alternatives as a replacement for current cost-reimbursement payment methods in response to the National Performance Review's (NPR) recommendation. The NPR recommended the fee-for-service approach to reduce the burden associated with maintaining systems for charging administrative costs to Federal programs and preparing and approving cost allocation plans. This approach should also increase incentives for administrative efficiencies and improve outcomes.

AHA's fee-for-service system charges and recovers AHA's corporate costs associated with administering HUD programs and grants. This type of system is commonly found in any private real estate corporation. Under this system, AHA will charge each property, program, or grant a fixed fee for administration and corporate costs. AHA will generate a predetermined amount (budget) for administration and corporate costs. This will be set forth in the MTW Plan. The budgeted amount will be prorated to the various programs and grants as set out in the following paragraphs.

1. **Mixed-Finance Development and HOPE VI Projects.** AHA will charge each project a fee-for-service for the administrative support provided. This fee will not exceed 5% of the total project development costs which is generally in accordance with guidelines for the use of HOPE VI grants regarding the allocation of costs of shared resources. This fee will be identified in the applicable funding documents (development budgets and grant budgets) and will be charged to the appropriate funding sources in accordance with the F1s as approved by HUD.

2. **Other HUD Grants and Programs.** AHA will charge each property, program and grant a fee for service. The fee for service for each property will be based on the number of units in the program. The fee for service (administrative fee) charged to Housing Choice Voucher Program will be based on the number of vouchers funded and the fee for service to administer HUD awarded grants such as ROSS, Development or Capital Fund Program will be based on a percentage of the grant award.

Fee charges will be established at reasonable and appropriate levels. Some of these levels are already established within programs or grants. For example, the Administration Line in most grant programs is established at 10 percent. Rather than maintain a complex allocation system that identifies individuals and their time charged to the grant, the fee for service charged to the grant would be a flat 10 percent of the grant.

**Fee-for-Service Benefits.** As envisioned by OMB, the fee-for-service approach will provide benefits to AHA and to HUD. Such a fee-for-service approach would assist AHA in moving to an asset management corporate model with true project based accounting as proposed under the new draft Public Housing Operating Subsidy rule. In addition the fee-for-service methodology will reduce the burden associated current systems, and will enable AHA to create an asset management organizational model that promotes property based accounting and management.

One distinct benefit of converting to a system of fixed rate is that AHA will no longer have to maintain an elaborate cost-allocation system for charging overhead to different programs. Under the proposed system, AHA need only to be concerned that it generates a predetermined amount of fee income and that it operates within its budget. In addition to creating a host of market incentives, this change would also greatly simplify financial accounting for AHA.

HUD's oversight and monitoring will be simplified under the fee-for-service methodology. Once a fee for a HUD grant or program is established, the drawing of funds and related documentation is greatly simplified. Fee-for-service also greatly reduces the possibility for accounting errors and potential audit findings. Finally, this is OMB's recommended mechanism for paying costs for administering Federal programs.

**HUD Review**

AHA's HUD-appointed MTW Liaison, Eugene Geritz, approved the Fee for Service Methodology on September 23, 2005. The new methodology was also approved as part of HUD's approval of AHA's FY 2006 CATALYST Implementation Plan.

**DISPOSITION OF PUBLIC HOUSING UNITS AT MIXED-FINANCE COMMUNITIES PROTOCOL**

The Housing Authority of the City of Atlanta, Georgia (AHA) and the United States Department of Housing and Urban Development (HUD) are parties to a Moving to Work Demonstration Agreement (MTW Agreement), effective July 1, 2003. In order to promote the more effective and efficient operation of low-income housing at AHA-sponsored mixed-income mixed-finance communities, AHA will dispose of the public housing units at these mixed-income communities out from under the existing Annual Contributions Contract ("ACC"), as amended by the applicable Mixed-Finance Amendment to the ACC.

## *MTW Agreement Reference*

*AHA is implementing this disposition strategy using its MTW relief as outlined in the Statement of Authorizations of AHA's MTW Agreement, Section VI, C as outlined below:*

> *AHA, in consultation with HUD, is interested in exploring the conversion, as appropriate and feasible, of all or a portion of its public housing assisted units at Affected Communities (defined below) from public housing assistance under Section 9 of the 1937 Act to project-based assistance under Section 8 of the 1937 Act ("Project Based Financing Demonstration").*

**Disposition of Public Housing Assisted Units at Mixed-Finance Communities**

All of the AHA-sponsored mixed-income communities with public housing assisted units listed in AHA's FY 2006 Implementation Plan are candidates for disposition under this strategy.

In all cases, AHA will either amend an existing disposition application or submit a new disposition application in accordance with Section 18 of the U.S. Housing Act of 1937, as amended (the "Act"). Any submission will provide the following: (1) that the public housing assisted apartments are being disposed of out from under the ACC; (2) that the public housing assisted apartments will no longer constitute public housing assisted apartments; and (3) that such apartments will continue to be restricted as low-income housing for the remaining period of time under the applicable Mixed-Finance ACC Amendment and any Declaration of Trust or Declaration of Restrictive Covenants. A copy of any existing land use restrictive covenants will also be attached to the disposition application or amendment. The disposition application or amendment to HUD will also state that the appropriate justifications for the disposition apply including the following: (a) the disposition is appropriate and is in the best interests of the residents and AHA; (b) the disposition is consistent with the goals of the AHA and the AHA's MTW Plan; and (c) the disposition is otherwise consistent with Section 18 of the Act. In all cases, AHA reserves the right to withdraw any disposition application or amendment if AHA determines that HUD will not fund replacement housing vouchers that might be needed to pursue AHA's strategy.

AHA envisions that it will pursue this strategy primarily in three scenarios.

1. **Mixed-Income Communities Where AHA Is The Ground Lessor.** In this first scenario, AHA will amend the existing disposition application to state that AHA will not provide replacement public housing units in connection with the disposition as originally planned. In these transactions, AHA disposed of the land through a long-term ground lease to further the public purpose of providing housing for low-income families. The amendment will provide that AHA will dispose of the public housing assisted units out from under the ACC, as amended, and provide that AHA will provide project-based tenant vouchers for the same number and type of units that were previously identified as replacement public housing assisted units. In connection with the submission of the amended disposition application, AHA will apply for relocation vouchers for the public housing assisted units. Existing residents will be given the opportunity to relocate using their vouchers. Relocation activities will be conducted in accordance with the requirements of the Uniform Relocation Act.

The purpose of the substitution would be to create a rent structure and funding mechanism that will allow the mixed-income community to operate at a more sustainable level. In this scenario, AHA will continue its current roles (e.g., as ground lessor or second mortgage lender) in the transaction.

2. **Mixed-Income Communities Where AHA Is Not The Ground Lessor And A Determination Has Been Made To Provide Project-Based Tenant Vouchers To The Mixed-Income Community.** In this second scenario, AHA does not own the land on which the mixed-income community has been built and AHA has determined that it is in the best interests of AHA and the residents to provide project-based tenant vouchers to the mixed-income community. AHA's determination would be based on the following factors: (1) the overall financial condition and performance of the property; (2) the physical condition and quality of the asset; and (3) the quality of life afforded the assisted families at the property.

AHA would prepare and submit a disposition application which would dispose of the public housing assisted units out from under the ACC, as amended, and would stipulate that AHA will provide project-based tenant vouchers for the same number and type of units that were previously identified as replacement public housing assisted units. In connection with the submission of the disposition application, AHA will apply for relocation vouchers for the public housing assisted units. Affected residents will be given the opportunity to relocate. Relocation activities will be conducted in accordance with the requirements of the Uniform Relocation Act.

The purpose of the change in subsidy would be to create a rent structure and funding mechanism that will allow the mixed-income community to operate at a more sustainable level and promote the long-term financial sustainability and improved performance of the mixed-income community. This will promote the more effective and efficient operation of low-income housing. In these transactions, AHA may continue its current role (e.g., as second mortgage lender) in the transaction, as necessary or advisable.

3. **Mixed-Income Communities Where AHA Is Not The Ground Lessor And A Determination Has Been Made To Provide The Affected Residents With Tenant Based Section 8 Assistance.** In the third scenario, AHA's assessment has resulted in a determination that the better approach to the change in subsidy is only to provide tenant based voucher assistance to the affected residents.

AHA would prepare and submit a disposition application which would dispose of the public housing assisted units out from under the ACC, as amended. In connection with the submission of the disposition application, AHA will apply for relocation vouchers for the public housing assisted units. Affected residents will be relocated in accordance with the requirements of the Uniform Relocation Act.

AHA would remove the public housing restriction from the public housing assisted apartments in order to preserve the financial viability of the mixed-income community and allow for the more efficient and effective operation of low-income housing. In these situations, the public housing restriction and the presence of AHA may hinder the ability of the owner, lenders and equity investors to restructure the financial transaction as may be necessary to salvage the financial viability of the property. AHA would not provide project-based tenant voucher assistance to the mixed-income community and AHA would discontinue or significantly modify its various roles in the current transaction.

In all three scenarios, AHA will work with the owner and also seek appropriate approvals from the financial investors and other interested parties, as required, including the Georgia Department of Community Affairs and other parties to the development transaction (e.g., lenders or equity investors) to obtain the necessary consents and amend the appropriate documents to reflect the new transaction structure and subsidy arrangement. These documents include, but are not limited to, the mixed-finance amendment to the ACC, the ground lease, if applicable, the second mortgage loan documents, the regulatory and operating agreement and any applicable partnership agreements. AHA will also seek HUD approval, if required, of any amended evidentiaries.

**Candidate Communities for Disposition**

Ashley Courts at Cascade
Ashley Terrace at West End
Centennial Place
CollegeTown at West End
Columbia Commons
Columbia Village
Magnolia Park
Summerdale Commons
The Village at Castleberry Hill
The Villages at Carver
The Villages of Eastlake
West Highlands at Heman E. Perry Boulevard

**HUD Review**

HUD approved AHA's disposition strategy as part of its approval of AHA's FY 2006 CATALYST Implementation Plan.

# MTW MIXED-FINANCE CLOSING PROCEDURES

The Housing Authority of the City of Atlanta, Georgia (AHA) and the United States Department of Housing and Urban Development (HUD) are parties to a Moving to Work Demonstration Agreement (MTW Agreement), effective July 1, 2003. AHA, in consultation with HUD, developed and is using the following procedure when using MTW or development funds in mixed-finance closing transactions.

## *MTW Agreement Reference*

In accordance with the provision of the MTW Agreement's Statement of Authorizations, Section V.A.2., AHA may use its MTW authority and funding flexibility to carry out the purposes of the MTW Demonstration Program.

### Mixed-Finance Closing Procedures

AHA consulted with Eugene Geritz on February 9, 2005, in developing a procedure for closing mixed-finance transactions involving MTW or development funds. AHA documented the procedure in correspondence to Mr. Geritz dated February 18, 2005. The agreed-upon procedures include the following key steps:

1. Prior to the mixed-finance closing, AHA will identify the MTW block grant funds (which consist of Section 9 Low Rent; Section 8 Housing Choice; and Section 14 Development, Capital Fund Program (CFP) and Replacement Housing Factor (RHF) funds) to be used in the Mixed-Financed development. These funds will either be in AHA's possession, or will be available for draw from HUD Development, CFP or RHF fund awards to AHA held at HUD.

2. AHA will prepare the appropriate closing documents, including development budgets and F1s. MTW funds will be identified on these documents as "MTW Funds" and will specify the type of fund (i.e. Development, CFP or RHF), without identifying specific grant awards.

3. All references to funding in closing documents will identify the same funds at the same level of detail.

4. CFP and RHF funds to be used for Mixed-Financed developments will remain in Budget Line Item (BLI) 1492 Moving to Work in the eLOCCS system.

5. AHA will maintain an internal accounting system that identifies CFP and RHF budgets and expenses for each phase of the Mixed-Financed development at the BLI level of detail that corresponds with the F1 for the project. AHA will provide this information in a memorandum to Gene Geritz prior to closing.

6. CFP and RHF funds in the MTW block grant may be used for any eligible use currently identified in AHA's MTW Agreement with HUD and, as such, may be used for all BLIs normally associated with Mixed-Financed developments to include, but not limited to, relocation, demolition, site acquisition, site work, construction, case management, and administration.

7. AHA may request and HUD will approve predevelopment budgets using MTW or development funds in a manner similar to HOPE VI revitalization grants. This includes all authorized BLI expenses, except for construction, when accompanied by the appropriate supporting documents. Predevelopment budgets for administrative and case management expenses may be approved to cover a period up to three months from the date of request. Budgets for predevelopment advances to developers may be approved in accordance with the safe harbor guidelines for HOPE VI awards.

In addition to the above outlined procedure for managing Mixed-Financed Development funding, AHA staff and Eugene Geritz agreed that the obligation and expenditure deadlines for RHF funds will be handled in the following manner.

- Per agreement with HUD Headquarters, obligation and expenditure deadlines for RHF funds used for development purposes will not be established until a phase closes using those funds. At that time, the funds are obligated and the four years for expenditure begin with the closing date.

- Any RHF funds in a predevelopment budget approved by HUD may be drawn without affecting the establishment of obligation and expense deadlines.

AHA and HUD staff worked cooperatively to develop documents to be used during these transactions. These documents include: 1) Mixed-Finance Pre-Closing Memo, 2) Form of Certification, 3) Form of the HUD HOPE VI Revised Overall Budget Approval, and 4) Mixed-Finance Closing Memo. (See the following pages for a copy of these documents.)

**HUD Review**

Eugene Geritz approved this procedure during a February 9, 2005 conference call and AHA documented the procedure in correspondence to Mr. Geritz dated February 18, 2005.

SAMPLE

**THIS IS THE FORM OF THE**

**ATLANTA – COLUMBIA PARK CITI RESIDENCES ( PERRY HOMES II )**

**MIXED-FINANCE PRE CLOSING MEMO**

**MOVING TO WORK DEMONSTRATION AGREEMENT**

**DRAFT - NOVEMBER 28, 2003**

Pursuant to the provisions of the Moving to Work Demonstration (MTW) Agreement between Department of Housing and Urban Development (HUD) and the Housing Authority of the City of Atlanta (AHA), signed September 25, 2003 and effective July 1, 2003, AHA hereby submits to HUD the **Mixed-Financed Pre Closing Memo** for Perry Homes Phase II, also known as Columbia Park Citi Residences. This memo is being submitted 30 days prior to the anticipated subject closing date.

HOPE VI Grant No. GA06URD006I198
HOPE VI Demolition Grant No. GA06URD 006D298
Project Development No. GA06P006094
Development Grant No. GA06P006089
Replacement Housing Factor Grants GA06R006501-00/01/02
ACC No. FW-A-3107 2/20/96

Development Structure

The Project will include a total of 152 rental housing units, including 61 public housing units, 19 tax credit units, and 72 market rate units, in the following unit distribution and type:

Unit Distribution – Public Housing

| Unit Type | 1BR | 2BR | 3BR | 4BR | Total Units | Total Bdrms |
|---|---|---|---|---|---|---|
| Walkup | | 46 | 15 | | 61 | 137 |
| TOTAL | | 46 | 15 | | 61 | 137 |

Unit Distribution – Tax Credit

| Unit Type | 1BR | 2BR | 3BR | 4BR | Total Units | Total Bdrms |
|---|---|---|---|---|---|---|
| Walkup | | 14 | 5 | | 19 | 43 |
| TOTAL | | 14 | 5 | | 19 | 43 |

**SAMPLE**

Unit Distribution – Market Rate

| Unit Type | 1BR | 2BR | 3BR | 4BR | Total Units | Total Bdrms |
|---|---|---|---|---|---|---|
| Walkup | | 54 | 18 | | 72 | 162 |
| TOTAL | | 54 | 18 | | 72 | 162 |

## Development Partners

**The owner entity is Columbia Park Citi Residences, L.P. (Owner Entity). The general partner of the Owner Entity is Columbia Park Partners, LLC (General Partner), which owns a .01% interest in the limited partnership. The equity investor (Limited Partner), having a 99.99% interest in the Owner Entity, is collectively BCCC, Inc. and BCP/Park Citi, LLC (Equity Investor). The developer of the Project is Perry Homes Redevelopment, LLC (Developer). The members of the Developer are Columbia Residential, LLC, Brock Built, LLC and Perry Golf Course Development, LLC. Atlanta Affordable Housing for the Future, Inc an affiliate of AHA will have a .01% interest in the General Partner.**

## Permanent Financing

The Project's permanent budget (**Attachment A**) shows that Total Project Uses are $26,954,918. The Developer is developing 152 units in Phase II at a Total Project Development Cost of $15,451,869. This cost includes the funds to be paid during Phase II for construction of the residential units, the site improvements and for architectural, planning and other soft costs.

As shown in **Attachment A** (permanent budget), the Developer is developing the 61 public housing units at a development cost of $4,575,000. AHA is loaning $1,273,532 of HOPE VI funds and $3,301,468 of Replacement Housing Factor funds for a total amount of $4,575,000 (AHA Loan) to the Owner Entity. The Equity Investor is purchasing Federal Low-Income Housing Tax Credits (LIHTCs) and Georgia State Low-Income Housing Tax Credits (LIHTCs) in exchange for $7,638,679 in LIHTC equity that will be invested in the Project. The Midland Affordable Housing Group Trust will make a mortgage loan to the Owner Entity in the amount of $3,046,500 (Mortgage Loan). There will be $191,690 in Deferred Cost (Developer Fee and financing fees).

AHA has allocated $8,788,114 of additional HOPE VI funds to pay for extraordinary site improvements and infrastructure, consulting and legal fees, community and supportive services. Thus the total amount of HOPE VI funds to be provided by AHA in Phase I is $10,061,646. AHA operating subsidy in the amount of $61,122 will be provided to fund the initial operating deficit reserve, HOPE VI Demolition funds of $313,307 will fund the demolition and remediation cost, $823,515 of Development funds will be used to fund the administrative costs, and $1,516,991 of Replacement Housing Factor funds will pay for the balance of the second phase of infrastructure cost.

**Construction Financing**

As shown in the Project's construction budget (**Attachment B**), the Equity Investor will provide $6,110,943 in LIHTC equity during construction. Bank of America, N.A. will make a construction loan to the Owner Entity in the amount of $3,043,720. There are deferred costs of $1,722,206, including various reserves and the Developer and AHA development fees.

Community Revitalization

The following community revitalization activities will be ......................

Environmental Assessment / Disposition Approval

The Atlanta Field Office approved the Environmental Assessment for this phase of development on _________. The SAC approved the Demolition and Disposition Application for this phase of development on ___________.

Certification

In accordance with the provisions of the MTW Agreement AHA will prepare a "Certification regarding the amount of HUD assistance provided for housing development utilizing low-income housing tax credits". The form of the Certification is shown on **Attachment C.**

Next Steps

AHS will prepare the Mixed-Finance Amendment and Exhibits A-G, and will submit for HUD's approval the following evidentiaires that will be listed in Exhibit E:

AHA's certifications of the required governmental approvals and permits, ground lease agreement, memorandum of the ground lease, regulatory and operating agreement, revitalization agreement, declaration of trust, quitclaim deed of release, non-disturbance and attornment agreement, and AHA opinion letters.

## SAMPLE

AHA and HUD will execute the Mixed-Finance Amendment to the Consolidated Annual Contribution Contract (Mixed-Finance Amendment) and the applicable evidentiaries as set out in Exhibit E to the Mixed-Finance Amendment at the time of the closing.

AHA will submit to HUD 2 business days prior to the date of the Mixed-Finance closing a Mixed-Finance Closing Memo in the form attached as **Attachment D.**

HUD will have the HOPE VI or other public housing funds as set out in Exhibit F of the Mixed-Finance Amendment placed in LOCCS within 2 days of receiving notice from AHA requesting the funds . See **Attachment E.**

AHA will submit to HUD within 30 business days of the date of the Mixed-Finance closing, copies of the recorded Evidentiaries as set out in Exhibits E and E1, together with copies of the applicable certifications, title policies, and executed copies of the Mixed-Finance Amendment.

Attachments: A through E

**SAMPLE**

**THIS IS THE FORM OF THE**
**ATLANTA – COLUMBIA PARK CITI RESIDENCES ( PERRY HOMES II )**
**MIXED-FINANCE CLOSING MEMO**
**MOVING TO WORK DEMONSTRATION AGREEMENT**
**DRAFT NOVEMBER 28, 2003**

Pursuant to the provisions of the Moving to Work Demonstration (MTW) Agreement between Department of Housing and Urban Development (HUD) and the Housing Authority of the City of Atlanta (AHA), signed September 25, 2003 and effective July 1, 2003, AHA hereby submits to HUD the **Mixed-Financed Closing Memo** for Perry Homes Phase II, also known as Columbia Park Citi Residences.

HOPE VI Grant No. GA06URD006I198
HOPE VI Demolition Grant No. GA06URD 006D298
Project Development No. GA06P006094
Development Grant No. GA06P006089
Replacement Housing Factor Grants GA06R006501-00/01/02
ACC No. FW-A-3107 2/20/96

Development Structure

The Project includes a total of 152 rental housing units, including 61 public housing units, 19 tax credit units, and 72 market rate units, in the following unit distribution and type:

Unit Distribution – Public Housing

| Unit Type | 1BR | 2BR | 3BR | 4BR | Total Units | Total Bdrms |
|---|---|---|---|---|---|---|
| Walkup | | 46 | 15 | | 61 | 137 |
| TOTAL | | 46 | 15 | | 61 | 137 |

Unit Distribution – Tax Credit

| Unit Type | 1BR | 2BR | 3BR | 4BR | Total Units | Total Bdrms |
|---|---|---|---|---|---|---|
| Walkup | | 14 | 5 | | 19 | 43 |
| TOTAL | | 14 | 5 | | 19 | 43 |

SAMPLE

Unit Distribution – Market Rate

| Unit Type | 1BR | 2BR | 3BR | 4BR | Total Units | Total Bdrms |
|---|---|---|---|---|---|---|
| Walkup | | 54 | 18 | | 72 | 162 |
| TOTAL | | 54 | 18 | | 72 | 162 |

Development Partners

The owner entity is Columbia Park Citi Residences, L.P. (Owner Entity). The general partner of the Owner Entity is Columbia Park Partners, LLC (General Partner), which owns a .01% interest in the limited partnership. The equity investor (Limited Partner), having a 99.99% interest in the Owner Entity, is collectively BCCC, Inc. and BCP/Park Citi, LLC (Equity Investor). The developer of the Project is Perry Homes Redevelopment, LLC (Developer). The members of the Developer are Columbia Residential, LLC, Brock Built, LLC and Perry Golf Course Development, LLC. Atlanta Affordable Housing for the Future, Inc an affiliate of AHA will have a .01% interest in the General Partner.

Permanent Financing

The Project's permanent budget (**Attachment A**) shows that Total Project Uses are $26,954,918. The Developer is developing 152 units in Phase II at a Total Project Development Cost of $15,451,869. This cost includes the funds to be paid during Phase II for construction of the residential units, the site improvements and for architectural, planning and other soft costs.

As shown in Attachment A (permanent budget), the Developer is developing the 61 public housing units at a development cost of $4,575,000. AHA is loaning $1,273,532 of HOPE VI funds and $3,301,468 of Replacement Housing Factor funds for a total amount of $4,575,000 (AHA Loan) to the Owner Entity. The Equity Investor is purchasing Federal Low-Income Housing Tax Credits (LIHTCs) and Georgia State Low-Income Housing Tax Credits (LIHTCs) in exchange for $7,638,679 in LIHTC equity that will be invested in the Project. The Midland Affordable Housing Group Trust will make a mortgage loan to the Owner Entity in the amount of $3,046,500 (Mortgage Loan). There will be $191,690 in Deferred Cost (Developer Fee and financing fees).

# SAMPLE

AHA has allocated $8,788,114 of additional HOPE VI funds to pay for extraordinary site improvements and infrastructure, consulting and legal fees, community and supportive services. Thus the total amount of HOPE VI funds to be provided by AHA in Phase I is $10,061,646. AHA operating subsidy in the amount of $61,122 will be provided to fund the initial operating deficit reserve, HOPE VI Demolition funds of $313,307 will fund the demolition and remediation cost, $823,515 of Development funds will be used to fund the administrative costs, and $1,516,991 of Replacement Housing Factor funds will pay for the balance of the second phase of infrastructure cost.

**Construction Financing**

As shown in the Project's construction budget (**Attachment B**), the Equity Investor will provide $6,110,943 in LIHTC equity during construction. Bank of America, N.A. will make a construction loan to the Owner Entity in the amount of $3,043,720. There are deferred costs of $1,722,206, including various reserves and the Developer and AHA development fees.

Community Revitalization

The following community revitalization activities will be …………………

Mixed-Finance Pre Closing Memo

HUD received the Perry Homes Phase II Pre Closing Memo on ___________. This Mixed-Finance Closing Memo shall supersede the Pre Closing Memo.

Environmental Assessment / Disposition Approval

The Atlanta Field Office approved the Environmental Assessment on _________.
The SAC approved the Demolition and Disposition Application on ___________.

Certification

In accordance with the provisions of the MTW Agreement AHA has prepared a "Certification regarding the amount of HUD assistance provided for housing development utilizing low-income housing tax credits". See **Attachment C.**

## SAMPLE

Next Steps

HUD will have the HOPE VI or other applicable public housing funds as set out in Exhibit F of the Mixed-Finance Amendment placed in LOCCS within 2 days of receiving notice from AHA requesting the funds . See cover letter. (**Attachment E to Pre Closing Memo).**

AHA and HUD will execute the Mixed-Finance Amendment to the Consolidated Annual Contribution Contract (Mixed-Finance Amendment) and the applicable evidentiaries set out in Exhibit E to the Mixed-Finance Amendment

The Mixed-Finance Amendment assures that the 61 units are public housing units for all purposes including the Performance Funding System and that the units will be eligible to receive operating subsidy. Consequently, the public housing units will be managed and operated in compliance with all public housing requirements.

The Director of the Office of Public Housing (OPH) at the Atlanta Regional Office, Boyce Norris, has been authorized by HUD to execute all copies of the Mixed-Finance Amendment on behalf of the Department. OPH will keep one copy for use by their office and return the other four copies to AHA. AHA will retain one copy and provide one copy to the owner entity. The other two copies should be returned as described below.

The Director has also been authorized by HUD to sign the Quit Claim Deed of Release, Regulatory and Operating Agreement, Memorandum of Ground Lease, and the Non-Disturbance and Attornment Agreement on behalf of the Department.

AHA will submit to HUD, within 30 business days of the date of the Mixed-Finance closing, two final and complete binders containing copies of all of the recorded Evidentiaries as set out in Exhibits E and E1. AHA will include with the binders:

- the required opinions of counsel, together with a certification attesting that no changes to the evidentiary materials have been made since the documents were last submitted and approved by HUD;
- a final title insurance policy that reflects the recordation of all liens, mortgages and encumbrances against the property, in the order approved by HUD; and,
- one original copy of the executed Mixed-Finance Amendment with each binder.

AHA will send one binder to Dhoya Bentley, HUD Office of Counsel, Atlanta Regional Office, and one to Eugene Geritz, Grant Manager, Office of Public Housing Investments, Denver Regional Office.

Attachments: A through E

**SAMPLE**

**THIS IS THE FORM OF THE CERTIFICATION**
**NOVEMBER 28, 2003**

**CERTIFICATION REGARDING THE AMOUNT OF HUD ASSISTANCE**
PROVIDED FOR HOUSING DEVELOPMENT UTILIZING
LOW-INCOME HOUSING TAX CREDITS

Pursuant to the provisions of the Moving to Work Demonstration Agreement between the United States Department of Housing and Urban Department and The Housing Authority of the City of Atlanta, Georgia signed on September 25, 2003, I certify that the assistance provided by the U.S. Department of Housing and Urban Development to **Columbia Estates Phase II (formerly Perry Homes II)** is not more than is necessary to provide affordable housing after taking into account other assistance including Low-Income Housing Tax Credits. This certification is based solely on information included as Attachments A-D hereto dated November __, 2003.

____________________________ ____________________

Renée Lewis Glover Date
President and Chief Executive Officer
The Housing Authority of the City of Atlanta, Georgia

SAMPLE

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, D.C. 20410-5000

OFFICE OF THE ASSISTANT SECRETARY

FOR PUBLIC AND INDIAN HOUSING

**THIS IS THE FORM OF THE HUD HOPE VI**

**REVISED OVERALL BUDGET APPROVAL**

**NOVEMBER 28, 2003**

Ms. Renee Lewis Glover

President and Chief Executive Officer

Housing Authority of the City of Atlanta, Georgia

250 John Wesley Dobbs Avenue
Atlanta, GA 30303-249

Subject: Approval of Second Revision to HOPE VI Budget for Perry Homes
HOPE VI Grant No. GA06URD006I196

Dear Ms. Glover:

The Department of Housing and Urban Development (the Department) hereby approves the Housing Authority of the City of Atlanta's (AHA's) second revision to the HOPE VI Budget for Perry Homes, also known as Columbia Estates.

A request was made by AHA on November 19, 2003 to amend the previously revised HOPE VI Budget. The adjusted fund amounts as approved by the Department are shown under the following Budget Line Items:

| BLI | Description | Original HOPE VI Budget | Revisions to the HOPE VI Budget | Revised HOPE VI Budget |
|---|---|---|---|---|
| **1408** | Management Improvements | $2, 565,842 | $2,110,263 | $4,676,105 |
| **1410** | Administration | $406,979 | ($3) | $406, 976 |
| **1430** | Fees and Costs | $3,102,074 | ($2,173,074) | $929, 000 |
| **1450** | Site Improvements | $4,696,109 | $4,268,278 | $8,964,387 |
| **1460** | Dwelling Structures | $7,728,996 | ($2,705,464 | $5,023,532 |
| **1470** | Nondwelling Structure | $1,500,000 | ($1,500,000) | $0 |
| **1475** | Nondwelling Equipment | $0 | $0 | $0 |
| **2485** | Demolition | $0 | $0 | $0 |
| **1495** | Relocation Costs | $0 | $0 | $0 |
| **TOTAL** | | $20,000,000 | $0 | $20,000,000 |

# SAMPLE

We look forward to the successful implementation of AHA's excellent plan for the revitalization of Perry Homes and to your submission of the **Mixed-Finance Pre Closing Memo** for the next phase of development. If you have any questions, please contact Eugene Geritz, Grant Manager, at (303) 672-5372, extension 1234.

Sincerely,

Dominique G. Blom
Director, Urban Revitalization
HOPE VI Division
Office of Public Housing Investments

CC: Boyce Norris, Atlanta Regional Office
Dhoya Bentley, Atlanta Regional Office
Eugene Geritz, Denver Regional Office

**SAMPLE**

Ms. Renee Lewis Glover

President and Chief Executive Officer
Housing Authority of the City of Atlanta, Georgia
230 John Wesley Dobbs Avenue
Atlanta, GA 30303

Subject: Approval of the Revised HOPE VI Budget for Perry Homes
HOPE VI Grant No. GA06URD0061196

H:\osdth\phas\Atlanta(city)\HOPE VI Budget Rev.doc

| Correspondence Code | Originator PIU | Concurrence PIU | Concurrence | Concurrence | Concurrence | Concurrence |
|---|---|---|---|---|---|---|
| Name | E Geritz | S Wilson | | | | |
| Date | 11/19/03 | | | | | |

Official Record Copy U.S. Department of Housing and Urban Development form HUD-713.1 (1/90)
ref. Handbook 2221.1

# Moving to Work Demonstration Program Agreement Between THE HOUSING AUTHORITY OF THE CITY OF ATLANTA, GEORGIA (AHA) And The U. S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT (HUD)

## Summary of Moving to Work Protocols
## April 24, 2007

A *Moving to Work (MTW) Protocol* is a HUD-approved acknowledgement or clarification of the intent of any authorization associated with the regulatory relief granted AHA by HUD through the Moving to Work Demonstration Program Agreement (MTW Agreement) and subsequent implementation plans; and the corresponding procedures and guidelines related to the implementation of MTW initiatives by AHA using said regulatory relief. Part I of this summary includes official MTW protocols based on the exchange of information between AHA and HUD. Part II includes formal MTW Protocols approved in annual implementation plans and supplements approved by HUD.

## Part I

This summary outlines the ongoing official dialogue between AHA and HUD with respect to MTW Protocols. The MTW Protocols will be presented by business line categories in chronological order using the following format.

**Business Line**

1. Subject

   Summary of Acknowledgement

   *Date of Approval; Approving Party; Source Document.*

---

**Corporate Support**

1. ACC Waiver

   The ACC Waiver includes the approved MTW waiver language that AHA may use to incorporate its MTW flexibility in its ACCs. The waiver language is for AHA's use with execution of ACC's during the MTW Agreement period, as well as for AHA to attach to the CFP ACCs that were executed earlier.

   *May 7, 2004; Gene Geritz; E-Mail memo to the file.*

2. HUD-52837 (Annual Statement/Performance and Evaluation Report OMB No. 2577-0157)

   AHA requested clarification from HUD Headquarters on the submission of HUD-52837 form and informed HUD that AHA would only be submitting Part I of form HUD-52837 in AHA's Annual Report and providing HUD with the information necessary to update eLOCCS. AHA requested a response if AHA’s clarification was not acceptable.

   *August 18, 2004; Althea Broughton; E-Mail to Jennifer G. Powers*

3. Preliminary MTW Technical Assistance (TA) Plan Approval

   HUD Headquarters provided preliminary approval of AHA's MTW Technical Assistance Plan. HUD also informed AHA of its notification to REAC, FHEO, OGC, all of PIH, Field Coordination and the field office of AHA's status as an MTW Agency and its exemptions from certain reporting requirements.

   *August 26, 2004; Jennifer G. Powers; E-mail memo to file*

4. HUD's Draft Approval of AHA's FY 2005 MTW Plan

   AHA provided comments to HUD on its draft approval letter of AHA's FY 2005 MTW Annual Plan.

   *September 1, 2004; Althea Broughton; E-Mail to Jennifer Powers*

5. Exemption from Requirement to Submit Unaudited Financial Statements to REAC

   HUD Headquarters notified local HUD of AHA's MTW status and its exemption to report to REAC on unaudited financial statements.

   *September 10, 2004; Jennifer G. Powers; E-mail memo to file*

6. TA Plan Approval

   HUD Headquarters approved AHA's MTW Technical Assistance Plan.

   *September 13, 2004; Jennifer G. Powers; E-mail memo to file*

7. Annual Adjustment Factor (FFY 04)

   HUD Headquarters approved AHA's appeal to the Annual Adjustment Factor (AAF) and clarified that the AAF appeal is a one time provision applicable only to FFY 2004 funding.

   *September 24, 2004; Janet K. Lenahan; E-mail memo to file*

8. Grant MTWTGGA0006 (TA Grant Set-Up in LOCCS)

   HUD Headquarters acknowledged that AHA's MTW Technical Assistance Grant is set up in LOCCS and will be activated upon receiving from AHA a LOCCS Access Authorization form which is to be sent to the CFO.

   *October 15, 2004; Jennifer G. Powers; E-mail memo to file*

9. Fee-For-Service Methodology Request and Approval

   Memo from Steve Nolan to Gene Geritz detailing AHA's Fee-for-Service Methodology.

   *February 18, 2005; Steve Nolan; Memo to Gene Geritz*

   HUD Headquarters approved AHA's Fee for Service proposal.

   *March 22, 2006; Gene Geritz; E-mail memo to file*

10. Revised MTW Benchmark Definitions

   Memo to Gene Geritz requesting MTW Agreement Amendment clarifying/revising MTW benchmark definitions. (New submission in FY 2007 Catalyst plan supplemental information.)

   *February 23, 2005; Gene Geritz; E-mail memo to file*

11. Attachment B - Moving to Work (MTW) Annual Plan and Report Elements - Revised

   Memo to Gene Geritz requesting MTW Agreement Amendment revising MTW Annual Plan and Report Elements and requirements. (Approved as part of AHA's FY06 CATALYST Plan.)

   *March 4, 2005; Gene Geritz; E-mail memo to file*

12. HUD Funding Availability - Impact on AHA's MTW Obligations

   Memo to Gene Geritz requesting MTW Agreement Amendment to reflect that AHA's commitment to serve substantially the same number of families under the MTW Demonstration as would have been served outside of the MTW Demonstration is subject to funding availability from HUD.

   *March 4, 2005; Gene Geritz; E-mail memo to file*

**Housing Choice Administration**

1. Waiver of 20% and 25% Rules Affecting use of Project-Based Assistance

   HUD provided clarification and confirmation that under AHA's MTW Agreement, AHA is permitted to exceed the current restrictions on the use of tenant-based assistance for project-based purposes. AHA may exceed (1) the requirement that no more than 20% of the funding available to AHA for tenant-based assistance may be used as project-based assistance, and (2) the requirement that no more than 25% of the dwelling units in any building may be assisted under a HAP contract for project-based assistance.

   *May 13, 2004; Jennifer G. Powers; E-mail memo to file*

2. MTW Vouchers (Replacement Vouchers)

HUD provided confirmation that AHA's MTW funds may be increased by additional allocations of Housing Choice vouchers to which AHA is entitled over the term of its MTW Agreement. HUD also acknowledged that any vouchers received in connection with relocation/demolition/disposition activity would be included in AHA's MTW block grant immediately in that they are "replacement" vouchers.

*June 15, 2004; Jennifer G. Powers; E-mail memo to file*

3. Clarification of AHA SEMAP Exemption (See SEMAP Recertification February 15, 2006)

HUD Headquarters provided clarification that AHA is fully exempt from SEMAP (and PHAS) for the duration of its MTW Agreement period. HUD also clarified that "MTW units" and "non-MTW units" are terms of art used to describe the units to be included in the block grant and not to be included in the block grant. However, all of AHA's vouchers are part of the MTW demonstration to a certain extent.

*August 25, 2004; Jennifer G. Powers; E-mail memo to file*

4. AHA Reporting Requirements Voucher Funds

HUD clarified that AHA is required by appropriations law which is not waived under its MTW Agreement, to report how the Agency expended its Voucher Funds as well as other types of funds in its MTW block grant.

*September 9, 2004; Jennifer G. Powers; E-mail memo to file*

5. Funding (Voucher Eligibility Inclusion)

HUD Headquarters verified vouchers/units that are eligible to move into MTW.

*September 24, 2004; Jennifer G. Powers; E-mail memo to file*

6. Guidance on Voucher Funding for FY 2004 and Partial FY 2005

HUD Headquarters clarified AHA's voucher funding for FY 2004 and Partial FY 2005 as outlined in an Excel spreadsheet that Steve Nolan included in this email communication.

*September 24, 2004; Janet K. Lenahan; E-mail memo to file*

7. Voucher and Funding Exclusions

   HUD Headquarters clarified vouchers eligible for block grant inclusion and provides reference to a website which provides information on how special purpose vouchers are treated. In addition, a memo is attached documenting AHA's MTW Funding Exclusions.

   *September 24, 2004; Jennifer G. Powers; E-mail memo to file*

8. Voucher Awards for Grady Homes and Gilbert Gardens (Block Grant Vouchers)

   HUD Headquarters conveyed to AHA that the vouchers for Grady Homes and Gilbert Gardens relocations could be immediately included in AHA's MTW block grant since the vouchers were not funded under HOPE VI.

   *September 24, 2004; Jennifer G. Powers; E-mail memo to file*

9. Voucher Eligibility for Block Grant Inclusion

   HUD Headquarters provided further clarification related to vouchers that are eligible for inclusion in AHA's MTW block grant.

   *September 24, 2004; Bernice Unland; E-mail memo to file*

10. Voucher Funding (One Month's Reserves)

    HUD Headquarters confirmed that AHA was to receive funding for one month's reserves during FY 2005.

    *September 24, 2004; Jennifer G. Powers; E-mail memo to file*

11. Voucher Funding Problem (One Month's Reserve)

    HUD Headquarters acknowledged that there was a voucher funding problem for most MTW block grant agencies and informed AHA of its plans to discuss this issue in an upcoming conference call.

    *September 24, 2004; Jennifer G. Powers; E-mail memo to file*

12. Non-MTW 50058 (PIC Transmissions)

    HUD Headquarters clarifies that under MTW, AHA is not required to transmit any 500058s to HUD for Housing Choice or Public Housing until HUD fully establishes its MTW 50058 reporting system.

    *October 19, 2004; Jennifer G. Powers; E-mail memo to file*

13. Subsidy Layering Review: Project-Based Section 8

HUD Headquarters confirmed AHA's ability to perform subsidy layering for project-based voucher assistance in lieu of HUD.

*December 22, 2004; Jo Ann Teiken; E-mail memo to file*

14. Program Flexibility for Non-Block Grant Vouchers

Memo to Gene Geritz from Althea Broughton requesting MTW Agreement Amendment clarifying that full program flexibility applies to vouchers which are not funded through the Moving to Work (MTW) block grant. This request is pending.

*February 23, 2005; Gene Geritz; Memo to Gene Geritz*

15. Subsidy Layering Review - Project Based Assisted Projects

HUD Headquarters provided guidance to AHA on how to perform and document subsidy layering review analysis for project-based assisted projects.

*August 2, 2005; Gene Geritz; E-mail memo to file*

16. Modification of HAP Contracts

HUD Headquarters confirmed that AHA has the authority under its MTW Program to modify HAP agreements based on language in its MTW Agreement.

*September 27, 2005; Barry Troutman; E-Mail Memo to file*

17. SEMAP Recertification

In reference to HUD's notification of annual SEMAP certifications, AHA sent letter notifying local HUD of its MTW status and its exemption from SEMAP.

*February 15, 2006; Reneé Bentley; Letter to Atlanta OPH*

18. Notification of Monitoring of Voucher Program Utilization

In response to HUD's notification of monitoring voucher program utilization, AHA notified the appropriate HUD representatives of its MTW status and that under its MTW Agreement, AHA is no longer subject to voucher utilization rather AHA is now subject to Housing Choice budget utilization.

*May 5, 2006; Ben Williams; E-Mail Memo to file*

**Real Estate Management**

1. SAC Point of Contact

   HUD Headquarters notified AHA of Ainars Rodin as its assigned SAC Point of Contact for AHA.

   *September 13, 2004; Jennifer G. Powers; E-mail memo to file*

2. Alternate Resident Survey (November Submission Approved)

   HUD Headquarters approved AHA to submit an alternate resident survey to HUD for approval by late November 2004.

   *September 24, 2004; Jennifer G. Powers; E-mail memo to file*

3. Non-MTW 50058 (PIC Transmissions)

   HUD Headquarters clarifies that under MTW, AHA is not required to transmit any 500058s to HUD for Housing Choice or Public Housing until HUD fully establishes its MTW 50058 reporting.

   *October 19, 2004; Jennifer G. Powers; E-mail memo to file*

**Real Estate Development & Acquisitions**

1. Site and Neighborhood Standards Procedures with FHEO/HUD

   HUD Headquarters provided clarification to local HUD Office that under AHA's MTW Agreement, AHA is authorized to adopt alternative site and neighborhood standards set forth in Section VI.B.3 of its MTW Agreement. Accordingly, AHA is to certify to HUD that it has met HUD selection requirements, and must maintain the documentation evidencing that it has met such requirements.

   *June 15, 2004; Jennifer G. Powers; E-mail memo to file*

2. HUD Guidance on REAC Inspections, TDC and Amendments to Mixed Finance Evidentiaries

   HUD Headquarters provided guidance on the following topics:

   REAC inspections at mixed-income/Signature Properties will be conducted inspecting a random sample of public housing assisted units that are occupied as of the date of the inspection.

   AHA is permitted to create its own Total Development Costs (TDC) standards for use with any HUD funding source including HOPE VI and Capital Funds. These standards must be market-based, use an independent cost estimating service, and can either be reviewed annually or adjusted automatically using an escalation factor based on a cost of living type index.

   For pre-MTW transactions, we would follow the same review and approval process and requirements set by HUD with respect to amendments to the evidentiaries. For post-MTW transactions, there are two lists of evidentiaries: (1) documents that are reviewed by HUD and, (2) documents that are not reviewed by HUD.

   *October 15, 2004; Gene Geritz; E-mail memo to file*

3. Centennial Park North

The communication regarding this property clarifies the reversion requirements for the Declaration of Trust for Centennial Park North. HUD Headquarters confirmed that since the construction finance closing will be almost simultaneous with the conveyance, a reversion is not needed.

*December 8, 2004; Gene Geritz; E-mail memo to file*

4. Capitol Homes Site (Capitol Store)

This email traffic between AHA and HUD representatives in which HUD confirms that in the case of submitting a demolition application for approval of the demolition of the Capitol Store, the demolition of the structure and the disposition of the site to the development partner are not subject to Section 18 of the Housing Act of 1937, as amended. Accordingly, it is not necessary to submit a demolition application to SAC.

*February 10, 2005; Ainars Rodin; E-mail memo to file*

5. Procedure for Mixed-Finance Developments involving MTW Funds

Memo to Gene Geritz documenting HUD-AHA agreed upon procedure when using MTW funds in Mixed-Finance Development. Response is still pending.

*February 18, 2005; Pending; Memo to Gene Geritz*

6. West Area CSO Storage Tunnel (Easement Request)

HUD Headquarters clarified that in accordance with the directions given by the SAC with regards to easements that directly benefit the Westminster community and surrounding development, the easement request made by the City of Atlanta affecting the development will not require HUD's approval.

*April 28, 2005; Gene Geritz; E-mail memo to file*

7. FY 2006 MTW Annual Plan (Including Supplemental Information) Re Subsidy Conversion

AHA emailed Subsidy Conversion description to Gene Geritz for his review and approval.

*April 6, 2006; Gene Geritz; E-mail memo to file*

**Part II**

This list includes MTW Protocols for AHA CATALYST initiatives that appear in annual implementation plans and supplements, as applicable. In the event an MTW Protocol was modified or revised, the revised MTW Protocol language was included in all plan and supplement documents.

**Asset Management**

1. Mixed-Income Communities "Working Laboratory" Initiative

   The Owner Entities will use innovative approaches to achieve goals and objectives at their properties. The Owner Entities may adopt and implement their own occupancy, leasing and rent policies and procedures with respect to their communities and the assisted residents or applicants. These policies and procedures would include, but not limited to, new rent structures (e.g., flat rents), application and waiting list procedures, eligibility and/or suitability criteria, program/training participation requirements and term limits.

   *January 12, 2006; Gene Geritz; HUD-Approved 2006 Plan*

2. Sustaining Investments in Mixed-Income, Mixed-Finance Communities; Disposition of Public Housing Assisted Units at Mixed-Finance Communities; and Tax Credit Compliance Model

   FY 2005 Plan: 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. 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.

   FY 2006 Plan: In order to promote the more effective and efficient operation of low-income housing at AHA-sponsored mixed-income communities, AHA will dispose of the public housing units at these mixed-income communities out from under the existing Annual Contributions Contract ("ACC"), as amended by the applicable Mixed-Finance Amendment to the ACC. All of the AHA-sponsored mixed-income communities with public housing assisted units listed in AHA's FY 2006 Implementation Plan are candidates for disposition under this strategy. In all cases, AHA will either amend an existing disposition application or submit a new disposition application in accordance with Section 18 of the U.S. Housing Act of 1937, as amended (the "Act"). Any submission will provide the following: (a) that the public housing assisted apartments are being disposed of out from under the ACC; (b) that the public housing assisted apartments will no longer constitute public housing assisted apartments; and (c) that such apartments will continue to be restricted as low-income housing for the remaining period of time under the applicable Mixed-Finance ACC Amendment and any Declaration of Trust or Declaration of Restrictive Covenants. A copy of any existing land use restrictive covenants will also be attached to the disposition application or amendment. The disposition application or amendment to HUD will also state that the appropriate justifications for the disposition apply including the following: (a) the disposition is appropriate and is in the best interests of the residents and AHA; (b) the disposition is consistent with the goals of the AHA and the AHA's MTW Plan; and (c) the disposition is otherwise consistent with Section 18 of the Act. In all cases, AHA reserves the right to withdraw any disposition application or amendment if AHA determines that HUD will not fund replacement housing vouchers that might be needed to pursue AHA's strategy.

*September 10, 2004; Milan Ozdinec; HUD-Approved 2005 Plan*

*January 12, 2006; Gene Geritz; HUD-Approved 2006 Plan*

**Corporate Support**

1. <u>Accessibility and 504/ADA</u>

<u>FY 2007 Plan:</u> AHA receives federal financial assistance for all of its major programs and is therefore subject to Section 504, ADA and Fair Housing. Moreover, AHA is wholly committed to the commitment, to the greatest extent possible, with the adoption of its policy on access to AHA facilities and programs (the "Accessibility Policy") included in its *Statement of Corporate Policies Governing the Leasing and Residency of Assisted Apartments* (Statement of Corporate Policies). AHA intends to continue to meet the need in the City of Atlanta for accessible affordable housing for disabled persons with accessible housing needs in such mixed-income communities (regardless of whether the subsidy is provided under Section 9 or Section 8 of the U.S. Housing Act of 1937, as amended), through appropriate contractual relationships with the third party owners and, where appropriate and financially feasible, in AHA-owned properties, recognizing that such properties are undergoing transition.

*AHA has adopted this protocol in the absence of any prior HUD notice that it is in direct violation of specific provisions of the MTW Agreement and its Statement of Authorizations.*

2. Clarified MTW Program Benchmark Definitions and Measurable Outcomes

   FY 2007 Plan: AHA revised benchmark definitions and measurable outcomes to align better measures with AHA's Business Plan.

   *AHA has adopted this protocol in the absence of any prior HUD notice that it is in direct violation of specific provisions of the MTW Agreement and its Statement of Authorizations.*

3. Fee-for-Service Methodology

   FY 2006 Plan: AHA will implement a new "fee-for-service" methodology for allocating costs to HUD grants and programs for administration and overhead. Under this system, AHA will charge each property, program, or grant a fixed fee for administrative services and overhead. This new methodology uses the approach commonly found in private real estate firms to replace the cumbersome salary allocation systems traditionally found in public housing agencies.

   FY 2007 Plan: Careful review of the New Rule indicates that its intent is to develop a funding methodology that would reflect "the costs of services and materials needed by a well-run PHS to sustain the project." The focus of the New Rule, therefore, is only on operating a project rather than on the funding required to support a repositioning strategy. AHA under MTW, on the other hand, is considering a full life cycle for its properties, including operations, development, and/or repositioning through demolition or disposition.

   *January 12, 2006; Gene Geritz; HUD-Approved 2006*

   *AHA has adopted this protocol in the absence of any prior HUD notice that it is in direct violation of specific provisions of the MTW Agreement and its Statement of Authorizations.*

4. Investment Flexibility

   FY 2007 Plan: AHA intends to use its Moving to Work (MTW) authority to invest, through grants or loans, a portion of its MTW Funds in housing properties owned by private owners in order to develop or rehabilitate housing units that are affordable to low-income families.

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5. MTW Reporting

FY 2006 Plan: A table included in the supplemental section of the FY 2006 Plan outlines AHA’s new reporting requirements for future MTW Annual Plans and Reports. These new reporting requirements will be in effect for AHA’s FY 2007 MTW Annual Plan, AHA’s FY 2006 Annual Report and all subsequent Annual Plans and Reports.

*January 12, 2006; Gene Geritz; HUD-Approved 2006*

6. MTW Single Fund

FY 2007 Plan: In FY 2007, AHA will continue to combine the budget allocations from three programs into a Single Fund in carrying out the activities of its MTW program: Low Income Operating Subsidy (and related income from property operations); Housing Choice Voucher budget allocation for MTW vouchers; and the Capital Fund. These funding sources will be used interchangeably for eligible MTW purposes. AHA will also use other program funds such as HOPE VI, Development Grants, and ROSS Grants to carry out activities related to those grants which are aligned with AHA’s Business Plan.

*January 12, 2006; Gene Geritz; HUD-Approved 2006*

*AHA has adopted this protocol in the absence of any prior HUD notice that it is in direct violation of specific provisions of the MTW Agreement and its Statement of Authorizations.*

7. Project-based Accounting and Financial Systems/Quarterly Financial Statements by Business Line: Project-based and Asset Management Systems

FY 2006 Plan: During FY 2006, AHA will complete the implementation of a project-based accounting and management system. Under this system, full financial statements will be issued for each AHA-owned property. This new system will enable AHA to comply with HUD’s proposed new funding methodology under the Low Rent Operating Subsidy program. As part of the implementation, further improvements will be made to AHA’s information technology/ financial reporting environment. These and other enhancements to AHA’s ORACLE automated system will also allow AHA to produce quarterly financial statements by business line.

FY 2007 Plan: Under the MTW Demonstration Program, AHA will seek to enhance its project-based accounting, project-based management and asset management systems, to focus on a repositioning strategy for its properties. AHA’s approach considers the full life cycle of its properties, including operations, development, and/or repositioning through demolition or disposition. AHA constructed these systems with the aim of developing better, more efficient ways to provide housing assistance to low and very-low-income families.

*January 12, 2006; Gene Geritz; HUD-Approved 2006*

*AHA has adopted this protocol in the absence of any prior HUD notice that it is in direct violation of specific provisions of the MTW Agreement and its Statement of Authorizations.*

8. Utility Allowance Waiver

FY 2007 Plan: HUD regulations might indicate the need for new utility allowances and new rates for computing excess utility charges on a periodic basis. Utility operations are an integral part of AHA's public housing program which is currently undergoing significant changes under its Business Plan. While neither the utility allowance nor the rates for excess utilities have changed during the MTW demonstration, the average total tenant payment for rent and utilities has increased for our clients putting a higher demand on the tenant income.

This is due to the increase in minimum rent from $25 to $125 in 2004 under AHA's Business Plan, as well as implementation of the work/program participation requirement which resulted in increased incomes and corresponding increased tenant rents. Together, these two initiatives were instrumental in increasing the average tenant rent from $165.36 in February 2004 to $203.93 in July 2006, an increase of over 23%. It is assumed that these increases subsumed any necessary increase in excess utility charges. Because of the dynamics identified above, AHA believes it is not the appropriate time for AHA to consider changing either its utility allowance or the rate it uses to compute excess utilities. Under the provisions granted by its MTW Agreement, and as part of AHA's comprehensive repositioning effort, the agency will not adjust the utility allowance and has frozen the rates it charges for excess utilities.

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9. Work/Program Requirements

FY 2005 Plan: 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 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.

*September 10, 2004; Milan Ozdinec; HUD-Approved 2005 Plan*

*January 12, 2006; Gene Geritz; HUD-Approved 2006 Plan*

10. Use of MTW Funds/Investment Flexibility

FY 2007 Plan: AHA intends to use its Moving to Work (MTW) authority to invest, through grants or loans, MTW Funds in residential properties owned by private entities in order to facilitate the creation of mixed-income communities by promoting and supporting the development and rehabilitation of housing units that are affordable to low-income families. These properties will not be subject to an Annual Contributions Contract (ACC) between AHA and the United States Department of Housing and Urban Development (HUD) nor will they be subject to a Declaration of Trust in favor of HUD.

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11. Mixed-Finance Closing Procedures

FY 2007 Plan: AHA, in consultation with HUD, developed and is using a revised procedure when using MTW or development funds in mixed-finance closing transactions.

*February 18, 2005; Pending; Memo to Gene Geritz*

12. Revision of MTW Benchmarks

FY 2007 Plan: Since the execution of the MTW Agreement, AHA has clarified the MTW Benchmarks and their corresponding outcome measures included in Attachment D of the MTW Agreement in order to align them with AHA's Business Plan objectives.

*AHA has adopted this protocol in the absence of any prior HUD notice that it is in direct violation of specific provisions of the MTW Agreement and its Statement of Authorizations.*

13. Obligation and Expenditure of Capital Funds

FY 2007 Plan: The MTW Agreement relieves AHA of the requirement to comply with the United States Housing Act of 1937 (a few exceptions apply) as amended, a number of HUD regulations, notices, and other guidance to the extent necessary to implement AHA's Moving to Work Program. Among the requirements from which AHA is exempt are the provisions under Section 905.10 and 905.120 of 24 CFR Part 905. These two sections are HUD's implementing regulations for section 9(j) of the United States Housing Act of 1937, which deals with the obligation and expenditure of Capital Fund Program funds by public housing agencies.

*AHA has adopted this protocol in the absence of any prior HUD notice that it is in direct violation of specific provisions of the MTW Agreement and its Statement of Authorizations.*

14. Investment Flexibility

FY 2007 Plan: The MTW Agreement relieves AHA of the requirement to comply with the United States Housing Act of 1937 (a few exceptions apply) as amended, a number of HUD regulations, notices, and other guidance to the extent necessary to implement AHA's Moving to Work Program. Among the requirements from which AHA is exempt are the provisions under Section 905.10 and 905.120 of 24 CFR Part 905. These two sections are HUD's implementing regulations for section 9(j) of the United States Housing Act of 1937, which deals with the obligation and expenditure of Capital Fund Program funds by public housing agencies.

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**Housing Choice Administration**

1. AHA Standards and Incoming/Outgoing Ports

FY 2006 Plan: AHA will require out-going porting families to comply with the CATALYST standards, including compliance with AHA's work requirement, criminal background screening in accordance with AHA's standards, participation in AHA-approved self-sufficiency programs and the Good Neighbor program. AHA may waive these standards on a case-by-case basis for families that port to geographic areas where AHA determines that it is infeasible to administer compliance.

FY 2007 Plan: AHA currently requires voucher families to be in full compliance with the CATALYST standards, including compliance with AHA's work requirement, criminal background screening in accordance with AHA's standards, participation in AHA-approved self-sufficiency programs and the Good Neighbor program prior to approving the family's request to port to another jurisdiction. However, once under contract with a receiving PHA, AHA has no mechanism that allows continued enforcement of these requirements. During FY 2007, AHA will develop standards for outbound port families that will require ongoing compliance with all MTW requirements in order for AHA to continue to make payments on behalf of the family. In addition, AHA will require all incoming portability voucher holders to comply with CATALYST policy requirements. AHA will also establish limits on the number of families that can exercise the outbound portability option and the criteria for families to port out. In addition, inbound portability will only be accepted if the household is in full compliance with the working provisions and other CATALYST criteria.

*January 12, 2006; Gene Geritz; HUD-Approved 2006*

*FY 2007 Plan Submission; Pending*

2. Homeownership Standards

FY 2006 Plan – AHA will set certain eligibility criteria and standards for using the voucher for homeownership.

FY 2007 Plan – AHA will set certain eligibility criteria and standards for using the voucher for homeownership and open the voucher waiting list for families that demonstrate homeownership readiness. AHA will expand the area in which AHA voucher participants may purchase a home and work with identified homebuyers to provide a set aside for AHA voucher holders in identified subdivisions. Homeownership standards may include, but are not limited to, successful participant history as occupants of a single family unit, a limit on the percentage of a mortgage that can be paid using voucher subsidy, household compliance with the work requirement and minimum household income requirements.

*January 12, 2006; Gene Geritz; HUD-Approved 2006*

*AHA has adopted this protocol in the absence of any prior HUD notice that it is in direct violation of specific provisions of the MTW Agreement and its Statement of Authorizations.*

3. Housing Choice Fair Market Rent Standards

FY 2006 Plan: AHA will develop its own Fair Market Rents (FMRs) based on local market conditions which will be used in lieu of HUD fair market rent standards. This initiative will allow AHA to set subsidy amounts in accordance with local market conditions. The ability to set rents locally will allow AHA to maximize its Housing Choice Voucher budget authority.
FY 2007 Plan: AHA will develop its own Fair Market Rents (FMRs) based on local market conditions and identified submarkets that exist within the City of Atlanta. This initiative will allow AHA to set subsidy amounts in accordance with realistic market conditions. AHA will apply these FMRs to both the tenant-based and project-based programs. Rent reasonableness determination will be conducted utilizing the individual FMR schedules for each sub-market area within the City.

*January 12, 2006; Gene Geritz; HUD-Approved 2006*

*AHA has adopted this protocol in the absence of any prior HUD notice that it is in direct violation of specific provisions of the MTW Agreement and its Statement of Authorizations.*

4. Housing Choice Family Self-Sufficiency (FSS) Program

FY 2007 Plan: AHA is re-engineering its Housing Choice Family Self-Sufficiency (FSS) program in alignment with it CATALYST goals and to be more successful in assisting the families in the program with achieving the goals established in their FSS Plans and graduating successfully from the program. The re-engineering focuses on revisiting and possibly re-establishing existing contracts, improving counseling services, connecting families to AHA's Service Provider Network, described earlier, reconciliation of escrow funds and adjustment of guidelines for release and use of the escrow.

*January 12, 2006; Gene Geritz; HUD-Approved 2006*

5. Inspection Fees

FY 2006 Plan: AHA will charge landlords reasonable fees for pre-inspections and re-inspections to cover the administrative costs associated with these additional inspections. Additionally, participant households may be charged a re-inspection fee to cover the administrative costs of re-inspections due to certain deficiencies which are the responsibility of the household and remain unaddressed.

*January 12, 2006; Gene Geritz; HUD-Approved 2006*

*AHA has adopted this protocol in the absence of any prior HUD notice that it is in direct violation of specific provisions of the MTW Agreement and its Statement of Authorizations.*

6. In-take/Waitlist Re-engineering

FY 2007 Plan: AHA will design a new intake process, and organize and manage the waiting list in alignment with CATALYST requirements. The waiting list will be subdivided into homeownership readiness applicants, CATALYST compliant applicants and elderly/disabled applicants. AHA will establish a percentage of vouchers to be issued to each subcategory of applicants on the updated waiting list.

*AHA has adopted this protocol in the absence of any prior HUD notice that it is in direct violation of specific provisions of the MTW Agreement and its Statement of Authorizations.*

7. Landlord Certification and Training

FY 2006 Plan: AHA will develop a mandatory Landlord Certification Training Program to educate landlords on the requirements for placing and maintaining their properties in the Housing Choice Program.

*January 12, 2006; Gene Geritz; HUD-Approved 2006*

*AHA has adopted this protocol in the absence of any prior HUD notice that it is in direct violation of specific provisions of the MTW Agreement and its Statement of Authorizations.*

8. Modification of HUD Mandated Forms

FY 2006 Plan: To implement these and other voucher related initiatives included in this FY 2006 Implementation Plan and the Base Plan, AHA will modify certain HUD mandated forms and documents, including but not limited to the Housing Assistance Payment (HAP) contracts, the Agreement to make Housing Assistance

Payments (AHAP) and the voucher. AHA may also create new documents and forms to substitute for the typical HUD mandated forms used with the Housing Choice program.

FY 2007 Plan: To implement these and other voucher related initiatives included in this FY 2007 Implementation Plan and the Business Plan, AHA will modify certain HUD mandated forms and documents including but not limited to the Agreement to make Housing Assistance Payments (AHAP) and the Housing Choice Voucher. AHA may also create new documents and forms to substitute for the typical HUD mandated forms used with the Housing Choice program. AHA will also explore the implementation of a debit card system for Utility Housing Assistance Payments (UHAP).

*January 12, 2006; Gene Geritz; HUD-Approved 2006*

*AHA has adopted this protocol in the absence of any prior HUD notice that it is in direct violation of specific provisions of the MTW Agreement and its Statement of Authorizations.*

9. Place-based and People-based Deconcentration Plan/Strategy

FY 2005 Plan: 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.

*September 10, 2004; Milan Ozdinec; HUD-Approved 2005 Plan*

10. Program Moves

FY 2006 Plan: Working with landlords and participants, AHA will develop strategies to reduce the number of moves participants make while in the program.

FY 2007 Plan: Working with landlords and participants, AHA will develop strategies to reduce the number of moves participants make while in the program. Such moves create instability in the family and drive up costs for landlords, AHA and the families. AHA will explore a number of solutions to this problem including limiting the number of residential moves that a participant may make during a specified period. AHA will allow moves only for a limited number of reasons, including, but not limited to, emergencies and foreclosures.

*January 12, 2006; Gene Geritz; HUD-Approved 2006*

*AHA has adopted this protocol in the absence of any prior HUD notice that it is in direct violation of specific provisions of the MTW Agreement and its Statement of Authorizations.*

11. Project-based Voucher On-Site Administration; Site-based Waiting List at Project Based Voucher Assisted Communities

FY 2006 Plan: AHA will eliminate duplicative administrative processes related to the lease-up of units at a project-based assisted property and the determination of eligibility for a prospective participant in the Housing Choice program. Many of the functions which are currently performed by both AHA staff and property management will be handled on-site at the assisted property.

FY 2007 Plan: During FY 2006, AHA developed a Project-based Voucher Administration Plan, in accordance with the relief provided by its MTW Agreement that eliminates duplicative administrative processes related to the lease-up of units at a project-based assisted property and the determination of eligibility for a prospective participant in the Housing Choice program. In addition, during FY2007, AHA will implement a homeless demonstration program and a supportive housing program for persons with developmental disabilities and chronic mental illness, utilizing project-based vouchers.

*January 12, 2006; Gene Geritz; HUD-Approved 2006*

*AHA has adopted this protocol in the absence of any prior HUD notice that it is in direct violation of specific provisions of the MTW Agreement and its Statement of Authorizations.*

12. Project-Based Vouchers as a Development Tool

FY 2005 Plan: 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.

*September 10, 2004; Milan Ozdinec; HUD-Approved 2005 Plan*

*January 12, 2006; Gene Geritz; HUD-Approved 2006*

*AHA has adopted this protocol in the absence of any prior HUD notice that it is in direct violation of specific provisions of the MTW Agreement and its Statement of Authorizations.*

13. Re-engineering Housing Choice Operations Systems/Processes

FY 2007 Plan: Business systems and standard operating processes have been identified for re-design and improvements.

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14. Setting Market Rents under Housing Choice; Fixed Subsidy Initiative

FY 2005 Plan: 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. 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.

FY 2007 Plan: During FY 2007, AHA will research and explore the establishment of a "fixed" subsidy structure for Housing Choice participants. To improve cost efficiency and provide an incentive for families, AHA will explore strategies to implement a staged reduction of subsidy assistance to Housing Choice participants based on time in the program and other factors and will implement a single annual recertification process with no interim reporting or subsidy change procedures.

*September 10, 2004; Milan Ozdinec; HUD-Approved 2005 Plan*

*January 12, 2006; Gene Geritz; HUD-Approved 2006*

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15. Standards for Residency in Single Family

FY 2006 Plan: AHA will, if determined to be feasible, set standards for participants who want to use the voucher to live in single family homes. These standards may include, but are not limited to, household compliance with the CATALYST work requirement, a demonstrated ability to maintain a single family home and an acceptable participant household history.

FY 2007 Plan: AHA will, if determined to be feasible, set standards for participants who want to use the voucher to live in single family homes. These standards may include, but are not limited to, household compliance with the CATALYST work requirement, a demonstrated ability to maintain a single family home, an acceptable participant household history, and a minimum amount of earned income.

*January 12, 2006; Gene Geritz; HUD-Approved 2006*

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16. Tenant Characteristic Report

FY 2007 Plan: AHA will explore and develop a new mechanism to report program characteristics in lieu of the current HUD 50058 format. AHA will also develop a mechanism to enable Atlanta metropolitan PHA's to report 50058 data on AHA portability families that will enable enforcement of MTW requirements without a PIC error notice.

*January 12, 2006; Gene Geritz; HUD-Approved 2006*

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17. Voucher Management System Reporting

FY 2007 Plan: AHA will revise its reporting under the Voucher Management System (VMS) to only report on the non-MTW vouchers. All other Housing Choice reports will be submitted in accordance with the reporting requirements under the MTW Agreement.

*January 12, 2006; Gene Geritz; HUD-Approved 2006*

**Real Estate Development and Acquisitions**

1. Acquisitions

FY 2007 Plan: AHA intends to use its Moving to Work authority and funds to acquire parcels of real estate. These acquisitions will be in support of AHA's charter to provide affordable housing for low-income families. Parcels acquired will be utilized for a variety of purposes including rental, for sale and for retail and commercial projects supporting primarily the affordable housing for low-income families.

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2. Alternative and Supportive Housing (includes Affordable Assisted Living and Service-Enriched Housing)

FY 2005 Plan: 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.

FY 2006 Plan: AHA will work with DHR and the Georgia State Department of Community Affairs (DCA) to support new supportive housing developments. This collaboration could increase the inventory of quality affordable supportive housing for seniors and the disabled, particularly the mentally disabled who are currently inappropriately housed in AHA high-rises which have no supportive services resources to meet their unique needs. AHA will also pursue funds under the Public Housing Authority Affordable Assisted Living Demonstration Program, an anticipated joint grant sponsored by HUD and the U.S. Department of Health and Human Services.

FY 2007 Plan: In support of the Mayor's Regional Homeless Commission master plan to eliminate homeless in the city of Atlanta, AHA established a Homeless Demonstration Program that utilizes Project-based Vouchers to provide rental assistance targeted to the chronically homeless population. Under the program, AHA will allocate 100 vouchers annually for each of the next five years towards the implementation of this program. As part of the Regional Homeless Commission's master plan to develop quality Permanent Supportive Housing, the United Way of Metropolitan Atlanta, Inc. has raised $2 million for supportive services as a necessary to support the targeted population. During FY 2006, United Way issued a Request for Proposal (RFP) for service providers and selected five organizations that it would fund under this demonstration. AHA issued a RFP for owners of multi-family properties to submit proposals for existing residential developments for housing the Chronically Homeless. Such owners were required to partner with the United Way selected service providers to ensure that adequate services would be available. In FY 2007, a RFP will be issued for Projected-based Rental Assistance that will not be limited to existing housing units.

In addition, AHA will continue its work in partnership with foundations and supportive services organizations to identify alternative housing resources and services that will support relocation. During FY 2005, AHA partnered with the Annie E. Casey Foundation to develop and implement a pilot program called *Responsible Relocation* to identify alternative housing resources for public housing assisted families impacted by the revitalization of McDaniel Glen who are ineligible for Housing Choice voucher assistance or continued public housing assistance.

*September 10, 2004; Milan Ozdinec; HUD-Approved 2005 Plan*

*January 12, 2006; Gene Geritz; HUD-Approved 2006*

*AHA has adopted this protocol in the absence of any prior HUD notice that it is in direct violation of specific provisions of the MTW Agreement and its Statement of Authorizations.*

3. Developing Alternative Housing Resources

FY 2006 Plan: AHA will fund various alternative housing initiatives including, but not limited to, an initiative for the chronically homeless in the City of Atlanta. AHA, through an Intergovernmental Agreement, will provide the City of Atlanta or a City related governmental agency with an allocation of vouchers that will be used to provide subsidy for the supportive housing communities. The City of Atlanta or the designated agency will be responsible for identifying the development projects on a competitive basis. AHA will be responsible for the administration of the vouchers. In addition, AHA will continue its work in partnership with foundations and supportive services organizations to identify alternative housing resources that will support relocation. During FY 2005, AHA partnered with the Annie E. Casey Foundation to identify alternative housing resources for public housing assisted families impacted by the revitalization of McDaniel Glen who are ineligible for Housing Choice voucher assistance or continued public housing assistance. AHA will continue this approach, if proven to be a "best practice."

*January 12, 2006; Gene Geritz; HUD-Approved 2006*

4. Repositioning Portfolio

FY 2005 Plan: 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 RFP, AHA will accept those proposals that are most favorable to the AHA, the affected families and the surrounding neighborhoods.

FY 2006 Plan: AHA will continue to reposition its conventional public housing assisted properties in partnership with private sector development partners. Repositioning may involve any one or a combination of the following strategies: (1) major revitalization using HUD funds as seed capital to attract private investment; (2) major revitalization using vouchers (obtained from opting-out of the public housing program) and the value of the land as seed capital and equity to attract private investment; (3) sale; (4) land banking; or (5) acquisitions.

*September 10, 2004; Milan Ozdinec; HUD-Approved 2005 Plan*

*January 12, 2006; Gene Geritz; HUD-Approved 2006*

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5. Subsidy Conversion; Public Housing Reinvestment Initiative Pilot

FY 2005 Plan: 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 forward.

FY 2007 Plan: AHA may use any of three scenarios for dispositions associated with converting public housing units at AHA-sponsored mixed-income communities, as described in its FY 2006 Implementation Plan approved by HUD. In connection with the submission of a disposition application to HUD, AHA will apply for tenant-based vouchers which will be substituted for the public housing assistance tied to the property. Existing residents will be given the opportunity to relocate or remain at the property using their vouchers.

In the event a resident chooses to leave the property, the management agent representing the Owner Entity may market available affordable units to other eligible families. Households who are not eligible for vouchers may relocate to AHA Affordable Communities or will be offered Uniform Relocation Act (URA) benefits.

*September 10, 2004; Milan Ozdinec; HUD-Approved 2005 Plan*

*AHA has adopted this protocol in the absence of any prior HUD notice that it is in direct violation of specific provisions of the MTW Agreement and its Statement of Authorizations.*

6. Identity of Interest (IOI) Protocol

FY 2007 Plan: AHA has initiated a new methodology for processing the approval of Identity of Interest (IOI) relationships between the development partner procured by AHA (Development Partner) and the Development Partner's affiliated general contractor in order to carry out construction activities relating to the Mixed Finance Development being implemented by that Development Partner and AHA.

*AHA has adopted this protocol in the absence of any prior HUD notice that it is in direct violation of specific provisions of the MTW Agreement and its Statement of Authorizations.*

**Real Estate Management**

1. Affordable Flat Rent Demonstration

FY 2005 Plan: 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.

*September 10, 2004; Milan Ozdinec; HUD-Approved 2005 Plan*

*January 12, 2006; Gene Geritz; HUD-Approved 2006*

*AHA has adopted this protocol in the absence of any prior HUD notice that it is in direct violation of specific provisions of the MTW Agreement and its Statement of Authorizations.*

2. Clean and Safe Environment Requirement; Enhanced Business Systems Lease and Family Obligations Enforcement, Enhanced Criminal Screening, and Health and Safety Standards (Housing Choice Administration will also participate in implementation)

FY 2005 Plan: AHA will enforce higher health and safety standards in how residents and Housing Choice program participants maintain their housing units.

FY 2006 Plan: In the Base Plan, AHA identified certain policy and programmatic reforms needed for both the Public Housing and Housing Choice programs. These reforms are designed to improve the health, safety and welfare of families AHA serves and the neighborhoods in which they live. These reforms include improved screening and stricter lease enforcement. AHA will, as a policy and operational matter, recognize the distinction in the severity of certain crimes, creating two major categories of crimes: (1) crimes that are associated with violence or drugs and (2) non-drug related and non-violent crimes. These two categories will inform the intake process as well as the recertification process. AHA will also continue to enforce higher health and safety standards for all of the households served by AHA. Residents will be required to comply with these standards as a condition of receiving or maintaining subsidy assistance.

*September 10, 2004; Milan Ozdinec; HUD-Approved 2005 Plan*

*January 12, 2006; Gene Geritz; HUD-Approved 2006*

*AHA has adopted this protocol in the absence of any prior HUD notice that it is in direct violation of specific provisions of the MTW Agreement and its Statement of Authorizations.*

3. Elderly Admissions Preference; and Designated Housing

FY 2005 Plan: 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.

FY 2006 Plan: AHA will also, as necessary, apply and implement permanent designations to support the development of elderly housing in connection with its revitalization efforts, including but not limited to the revitalizations of Capitol Homes, Grady Homes, Harris Homes, McDaniel Glenn, and Perry Homes. "Elderly" and "almost elderly" have the same respective definitions as set forth in AHA's FY 2006 Implementation Plan.

*September 10, 2004; Milan Ozdinec; HUD-Approved 2005 Plan*

*January 12, 2006; Gene Geritz; HUD-Approved 2006*

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4. Elderly Income Disregard (Housing Choice Administration will also participate in implementation)

FY 2005 Plan: 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.

*September 10, 2004; Milan Ozdinec; HUD-Approved 2005 Plan*

*January 12, 2006; Gene Geritz; HUD-Approved 2006*

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5. Enhanced Real Estate Inspection Systems (Housing Choice Administration will also participate in implementation)

   FY 2005 Plan: During FY 2006, AHA will continue to use higher inspection standards for all subsidized units and integrate various inspection processes and systems.

   *September 10, 2004; Milan Ozdinec; HUD-Approved 2005 Plan*

   *January 12, 2006; Gene Geritz; HUD-Approved 2006*

   *AHA has adopted this protocol in the absence of any prior HUD notice that it is in direct violation of specific provisions of the MTW Agreement and its Statement of Authorizations.*

6. Individuals Development Accounts

   FY 2005 Plan: 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

   *September 10, 2004; Milan Ozdinec; HUD-Approved 2005 Plan*

   *January 12, 2006; Gene Geritz; HUD-Approved 2006*

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7. Minimum Rent (Housing Choice Administration will also participate in implementation)

   FY 2005 Plan: 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.

   *September 10, 2004; Milan Ozdinec; HUD-Approved 2005 Plan*

   *January 12, 2006; Gene Geritz; HUD-Approved 2006*

   *AHA has adopted this protocol in the absence of any prior HUD notice that it is in direct violation of specific provisions of the MTW Agreement and its Statement of Authorizations.*

8. MTCS/PIC Update (Housing Choice Administration and Asset Management will also participate in implementation)

   FY 2006 Plan: Under AHA’s MTW Agreement, AHA is required to submit MTCS data to HUD annually. In 1999, HUD instructed MTW agencies to suspend transmitting MTCS data for MTW families and directed MTW agencies to use the Form HUD-50058 MTW. However, PIC is unable to receive the Form HUD-50058 MTW. In the interim, HUD has instructed MTW agencies to collect and hold MTCS data. As required, AHA continues to collect and hold MTCS data for each assisted household. Upon implementation of the new PIC MTW module, AHA will submit electronic records for all assisted households, except as described below for assisted households in the AHA-sponsored mixed-income communities.

*January 12, 2006; Gene Geritz; HUD-Approved 2006*

9. Place-Based Supportive Services Strategy

FY 2006 Plan: AHA and the Georgia State Department of Human Resources (DHR) will pursue a "place-based" Medicaid strategy to create the delivery of case management and supportive services to elderly and disabled residents at AHA's high-rises.

*January 12, 2006; Gene Geritz; HUD-Approved 2006*

*AHA has adopted this protocol in the absence of any prior HUD notice that it is in direct violation of specific provisions of the MTW Agreement and its Statement of Authorizations.*

## SECRETARY'S CERTIFICATE

**I, RENÉE LEWIS GLOVER, DO HEREBY CERTIFY** that:

1. I am the presently appointed and qualified Secretary of the Board of Commissioners of The Housing Authority of the City of Atlanta, Georgia ("AHA"). In such capacity, I am custodian of its records and I am familiar with its organization, membership and activities.

2. Attached hereto as Exhibit 1 is a true and correct copy of a resolution authorizing AHA to submit its FY 2008 CATALYST Implementation Plan to the United States Department of Housing and Urban Development and to implement the projects and related policy changes described therein, and other related matters.

3. This resolution was presented to the AHA Board of Commissioners (the "Board") at its Regular Meeting on April 25, 2007 (the "Meeting").

4. The following Board members were present for the Meeting:

   Elder James Brown, Vice Chair
   Carol Jackson
   Margarette Paulyne Morgan White
   Aaron Watson
   Justine Boyd

5. At the Meeting, the Board unanimously adopted and approved the resolution attached hereto as Exhibit 1.

**IN WITNESS WHEREOF**, I have hereunto set my hand and the duly adopted official seal of The Housing Authority of the City of Atlanta, Georgia this 26th day of April, 2007.

**RENÉE LEWIS GLOVER,**
**Secretary**

SEAL

EXHIBIT 1
RESOLUTION ADOPTED AT THE REGULAR MEETING
OF THE BOARD OF COMMISSIONERS TO BE HELD ON
WEDNESDAY, APRIL 25, 2007

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RESOLUTION

WHEREAS, AHA executed its Moving To Work Demonstration Program Agreement (MTW Agreement) with HUD on September 25, 2003;

**WHEREAS,** the MTW Agreement is for a seven year term effective as of July 1, 2003;

WHEREAS, the MTW Agreement requires AHA to submit an MTW annual plan to the United States Department of Housing and Urban Development (HUD) in lieu of the Five-Year Plan and Annual Plan traditionally required by Section 5A of the Housing Act of 1937, as amended;

WHEREAS, each year during the MTW demonstration period, an MTW annual plan must be submitted to HUD with a board resolution approving the plan and certifying that a public hearing has been held regarding the plan;

WHEREAS, AHA has prepared its MTW annual plan or FY 2008 CATALYST Implementation Plan for the fiscal year beginning July 1, 2007;

WHEREAS, the FY 2008 CATALYST Implementation Plan identifies AHA's projects and policy changes to the Statement of Corporate Policies Governing the Leasing and Residency of Assisted Apartments and the Administrative Plan Governing the Housing Choice Program to be implemented during FY 2008;

**WHEREAS,** during FY 2008, AHA will also continue to improve and strengthen its corporate infrastructure, financial and reporting systems, information technology environment and human resources;

**WHEREAS,** these activities are described as Corporate Support;

**WHEREAS,** a summary of the projects and policy changes that will be implemented during FY 2008 are described in more detail in the attached Exhibit EO-1-A;

**WHEREAS,** AHA's FY 2008 CATALYST Implementation Plan is the product of an inclusive and comprehensive planning process involving numerous hours of planning and consultation with AHA's Board of Commissioners, AHA's Senior Management team, Resident Association presidents, AHA Advisory Board groups, Public Housing Assisted residents, Housing Choice participants, AHA employees, the Georgia Law Center for the Homeless, Atlanta Legal Aid, local political and government officials and other members of the public;

WHEREAS, comments and suggestions were made at those various meetings, all of which were considered by AHA;

WHEREAS, the consultation process included a properly advertised and noticed public hearing conducted by Commissioner James Brown, on behalf of AHA's Board of Commissioners, on April 19, 2007; and

WHEREAS, AHA is now requesting the Board of Commissioners to approve its FY 2008 CATALYST Implementation Plan and authorize the submission of its FY 2008 CATALYST Implementation Plan to HUD and to approve the implementation of the projects and related policy changes described in Exhibit EO-1-A.

**NOW, THEREFORE, BE IT RESOLVED BY THE BOARD OF COMMISSIONERS OF THE HOUSING AUTHORITY OF THE CITY OF ATLANTA, GEORGIA, THAT:**

1. AHA's FY 2008 CATALYST Implementation Plan, including the projects and related policy changes in the Statement of Corporate Policies Governing the Leasing and Residency of Assisted Apartments and the Administrative Plan Governing the Housing Choice Program described in Exhibit EO-1-A, attached hereto and incorporated herein by this reference is hereby approved.

2. The Chair of the Board of Commissioners and the President and Chief Executive Officer are hereby authorized to execute any required documents, certifications or United States Department of Housing and Urban Development (HUD) forms related to the approval and filing of AHA's FY 2008 CATALYST Implementation Plan without further vote or approval of this Board.

3. The President and Chief Executive Officer is authorized to submit AHA's FY 2008 CATALYST Implementation Plan and such other required documents, certifications or forms to HUD with such changes, additions, corrections or amendments as she shall deem necessary or appropriate or as may be required by HUD without further vote or approval of this Board.

4. The President and Chief Executive Officer is hereby authorized to negotiate with HUD regarding any portion of AHA's FY 2008 CATALYST Implementation Plan without further vote or approval of this Board.

5. The President and Chief Executive Officer is hereby authorized to implement the projects and policy changes set forth in the FY 2008 CATALYST Implementation Plan.

6. The President and Chief Executive Officer is hereby authorized to carry out other actions relating to the FY 2008 CATALYST Implementation Plan all without the further vote or approval of this Board

EXHIBIT EO-1-A

Atlanta Housing Authority (AHA)

FY 2008 CATALYST Activities Directory

4/20/2007

| Supporting Activity Name | Former Activity Name(s), If Applicable | FY 2008 Activity Description | FY 2008 Prioritization | Status as of 1/31/07 | FY 2005 | FY 2006 | FY 2007 | FY 2008 | Business Line |
|---|---|---|---|---|---|---|---|---|---|
| | | Revitalization Program | | | | | | | |
| Revitalization Program | Repositioning | AHA will continue its strategic revitalization program. Currently there are six major revitalization projects underway in various stages of development. AHA and our various private sector development partners are engaged in "community building" projects with the goal of creating healthy and economically sustainable mixed-use, mixed-income communities. | Priority | I | √ | √ | √ | √ | Real Estate Development & Acquisitions |
| Comprehensive Homeownership Program | Core Activity: Homeownership Program | AHA will continue the implementation of homeownership programs that develop affordable homeownership opportunities in healthy, mixed-income communities and prepare low-income families to become successful homeowners. | Priority | I | √ | √ | √ | √ | Real Estate Development & Acquisitions |
| | | Quality of Life Initiative | | | | | | | |
| Quality of Life Initiative | | The Quality of Life Initiative (QLI) will allow families in AHA's remaining conventional public housing communities the opportunity to relocate from environments of concentrated poverty. This strategy is consistent with AHA's vision of providing eligible families with access to affordable housing while deconcentrating poverty and building healthy communities. | Priority | P | | | | √ | Housing Choice Administration |
| Responsible Relocation | Enhanced Relocation Process<br><br>Enhanced Relocation Process and Database Enhancement | Responsible relocation will ensure choice, support and successful outcomes for each family. The Relocation Team will provide the families with the tools to make informed choices about the best housing opportunities for their family. | Priority | I | | √ | √ | √ | Housing Choice Administration |
| Good Neighbor Program II | Good Neighbor Program | AHA's Good Neighbor Program (GNP) is designed to coach and prepare AHA-assisted families to live and blend into the communities where they live and help them to understand and value their roles and responsibilities as good neighbors. The training will continue to be provided by Georgia State University during FY 2008. | Priority | I | | √ | √ | √ | Housing Choice Administration |
| Human Development and Support Services | Human Services Management<br><br>Client Services | During FY 2008, AHA will expand the Human Development and Support Services to provide support to families being relocated as part of the Quality of Life Initiative (QLI). Human development and support services will be provided to affected families for a 27-month period and AHA will solicit additional organizations to serve as Human Services Providers. | Priority | I | √ | √ | √ | √ | Real Estate Development & Acquisitions |
| Customer and Community Relations | | AHA will continue the implementation of the customer and community relations phone line (1-888-AHA-4YOU) in order to effectively respond to citizen concerns and compliments regarding Housing Choice participants in their neighborhoods. | Ongoing | I | | | | √ | Corporate Support |

**P** - Planning Phase, **I** - Implementation Phase, **PP** - Postponed

EXHIBIT EO-1-A
Atlanta Housing Authority (AHA)
FY 2008 CATALYST Activities Directory
4/20/2007

| Supporting Activity Name | Former Activity Name(s), If Applicable | FY 2008 Activity Description | FY 2008 Prioritization | Status as of 1/31/07 | FY 2005 | FY 2006 | FY 2007 | FY 2008 | Business Line |
|---|---|---|---|---|---|---|---|---|---|
| Project Based Rental Assistance as a Development Tool | | | | | | | | | |
| Project Based Voucher as a Development Tool | Partnering in Private Development Deals (Project-Based Procurement) | AHA will continue to use Project Based Rental Assistance to create additional affordable housing opportunities in healthy mixed-income communities for low-income families. | Priority | I | √ | √ | √ | √ | Real Estate Development & Acquisitions |
| Developing Alternative and Supportive Housing Resources | | During FY 2008, AHA will develop and implement three major initiatives toward developing alternative and supportive housing resources for income eligible families. These initiatives include: (1) Project Based Rental Assistance Homeless Demonstration Program; (2) Project Based Rental Assistance Mental Health Demonstration; and (3) Affordable Assisted Living Demonstration Program. | Priority | I | √ | √ | √ | √ | Real Estate Development & Acquisitions |
| Project Based Rental Assistance Regional Expansion Program | | In our continued effort to increase the quality and choice of the housing stock available to Housing Choice participants, AHA will negotiate Intergovernmental Agreements with various PHAs in the Atlanta metropolitan area subject to the provisions of State law to permit site-based administration of AHA's Project Based Rental Assistance Program in those jurisdictions. | Priority | P | | | | √ | Housing Choice Administration |
| Project Based Rental Assistance Homeless Demonstration Program | Developing Alternative and Supportive Housing | In support of the Mayor's Regional Homeless Commission master plan to eliminate homelessness in the city of Atlanta, AHA has established a Homeless Demonstration Program in collaboration with United Way of Metropolitan Atlanta, Inc. that utilizes Project-based Vouchers to provide rental assistance targeted to the chronically homeless population. During FY 2008, AHA will solicit proposals for project based assistance from housing providers who have partnered with United Way service providers or who will fund the requisite services. | Priority | I | | √ | √ | √ | Housing Choice Administration |
| Project Based Rental Assistance Mental Health Demonstration | Developing Alternative and Supportive Housing | AHA will work with the Georgia Department of Human Resources, Department of Mental Health and Department of Community Affairs to expand the supportive housing demonstration model to increase housing opportunities for persons with mental health disabilities. Proposals will be solicited from private developers and mental health service providers for existing, rehabilitations and/or new construction of housing with supportive services for persons with mental health disabilities. | Priority | P | | | | √ | Housing Choice Administration |



**P** - Planning Phase, **I** - Implementation Phase, **PP** - Postponed

| Supporting Activity Name | Former Activity Name(s), If Applicable | FY 2008 Activity Description | FY 2008 Prioritization | Status as of 1/31/07 | FY 2005 | FY 2006 | FY 2007 | FY 2008 | Business Line |
|---|---|---|---|---|---|---|---|---|---|
| Project Based Rental Assistance Site Based Administration | Voucher Administration Reform: On-Site Administration | In FY 2007, AHA implemented a site-based administration program for rental properties owned by public/private partnerships sponsored by AHA or other third party owners, for which AHA has provided Project Based Rental Assistance for a percentage of the units utilizing a web-based technology portal for interaction between AHA and the properties. During FY 2008, AHA will develop and implement an enhanced technology solution which will enable such owners to upload directly to the AHA system. | Ongoing | I | | √ | √ | √ | Housing Choice Administration |
| Affordable Assisted Living Demonstration | Development of Affordable Assisted Living<br><br>Developing Alternative and Supportive Housing Resources | During FY 2008, AHA will continue to explore strategies for developing affordable assisted living opportunities for low-income seniors and for disabled persons. These strategies will include but are not limited to exploring ways to leverage resources with Medicaid Waivers or other service funding through the Georgia Department of Human Resources and Georgia Department of Community Health and exploring ways to use Section 8 project-based rental assistance, Low Income Housing Tax Credits and other financial resources to create affordable assisted living models at AHA-sponsored mixed-income communities. | Priority | P | √ | | | | Real Estate Management |
| | | **Re-engineering Housing Choice Operations** | | | | | | | |
| Re-engineering Housing Choice Operations | | During FY 2008, AHA will continue the re-engineering of the Housing Choice Voucher Program. The re-engineering initiative is focused on redesign of systems and business processes utilizing state-of-the-art technology to move closer towards paperless administration of the Housing Choice Program. The re-engineering efforts also include the development and implementation of continuous quality improvement initiatives that will result in improved customer service and operational efficiencies and effectiveness. | Ongoing | I | √ | √ | √ | √ | Housing Choice Administration |
| Annual Re-certification Re-engineering | | AHA will complete the development of the automated re-certification module during FY 2008. Re-certification processes will continue to be streamlined. Households that are exempt from the work/program participation requirement (i.e. Elderly and Disabled) will be re-certified every two years effective July 1, 2007. Households fully compliant with the work/program participation requirement as of their FY 2008 annual re-certifications will also be re-certified every two years upon completion of their FY 2008 re-certifications. | Priority | P | | | √ | √ | Housing Choice Administration |



**P** - Planning Phase, **I** - Implementation Phase, **PP** - Postponed

| Supporting Activity Name | Former Activity Name(s), If Applicable | FY 2008 Activity Description | FY 2008 Prioritization | Status as of 1/31/07 | FY 2005 | FY 2006 | FY 2007 | FY 2008 | Business Line |
|---|---|---|---|---|---|---|---|---|---|
| Re-engineering Property Owner/Vendor Process | | AHA will re-engineer the process for approval and processing of property owners prior to execution of the Housing Assistance Payment (HAP) contract and eliminate paper checks and mailing of remittance forms to landlords by creating web-based access for each property owner | Priority | P | | | √ | √ | Housing Choice Administration |
| UHAP Bankcards | | In FY 2008, paper checks for payment of utility housing assistance payments will be eliminated and bankcards will be issued to eligible program participants. Cards will be loaded monthly with the amount of the UHAP payment and use will be restricted to Atlanta area utility providers only. | Priority | P | | | √ | √ | Housing Choice Administration |
| Automated Outbound Portability Billing | | AHA will work with the Housing Authority of Fulton County (HAFC) in FY 2008 to develop a demonstration to create an automated billing and payment process for all AHA vouchers ported to Fulton County. AHA and HACF will utilize the HUD PIC system to determine the amount of subsidy to be paid. A payment process directly through AHA's ORACLE MIS accounts payable module will be developed and implemented. | Priority | P | | | | √ | Housing Choice Administration |
| File Purges and E-Copy | | AHA will continue e-copying permanent files on an ongoing basis as a part of its routine operations. | Ongoing | I | | | √ | √ | Housing Choice Administration |
| Automated Rent Reasonableness System | | AHA will continue to utilize the automated rent reasonableness system established in FY 2007 as part of its routine operations. | Ongoing | I | | | √ | √ | Housing Choice Administration |
| Program Performance Indicators | | AHA will continue to develop and implement tracking systems for all key Housing Choice program performance indicators. During FY 2008, the automated voucher tracking system will be fully implemented to monitor all vouchers issued by type, average days to lease, voucher success rates for applicants, and program moves. Census tract data for all households will be captured to track impact of deconcentration strategies. | Ongoing | I | | | √ | √ | Housing Choice Administration |



**P** - Planning Phase, **I** - Implementation Phase, **PP** - Postponed

EXHIBIT EO-1-A
**Atlanta Housing Authority (AHA)**
**FY 2008 CATALYST Activities Directory**
**4/20/2007**

| Supporting Activity Name | Former Activity Name(s), If Applicable | FY 2008 Activity Description | FY 2008 Prioritization | Status as of 1/31/07 | FY 2005 | FY 2006 | FY 2007 | FY 2008 | Business Line |
|---|---|---|---|---|---|---|---|---|---|
| Customer Service Call Center | | AHA will enhance the design of the customer service call center to deliver improved customer service and to respond more quickly to customer needs. AHA has institutionalized the call center into its routine operations and will continue to operate the call center during FY 2008 and beyond. | Ongoing | I | | | √ | √ | Housing Choice Administration |
| Relocation Policies | | During FY 2007, AHA developed corporate policies for discretionary actions under the Uniform Relocation Act (URA) to guide relocation staff in providing relocation assistance and processing relocation claims. AHA will continue the implementation of these policies during FY 2008. | Ongoing | I | | | √ | √ | Housing Choice Administration |
| Automated Hearing Database | | During FY 2007, AHA developed and implemented an automated system to track proposed terminations, hearing requests, hearing actions and final disposition of terminations in the voucher program. AHA has incorporated the use of this system in its routine operations and will continue to utilize the system during FY 2008. | Ongoing | I | | | √ | √ | Housing Choice Administration |
| Developing Reoccupancy Process | | AHA will refine and improve the process for the re-occupancy of newly developed mixed-income communities. Revised procedures for the re-occupancy of the revitalized communities will be completed and included in AHA's Relocation Implementation Procedures Manual during FY 2008. | Ongoing | I | | | √ | √ | Housing Choice Administration |
| Prequalification of Units | | This activity is focused on establishing a methodology to pre-qualify available housing units prior to listing on AHA's website. AHA is postponing the development and implementation of this activity until FY 2009. | Postponed | PP | | | √ | √ | Housing Choice Administration |
| Automated Collections Process | | This activity focuses on the development and implementation of an automated system for fraud recovery and tracking of repayment agreements in the voucher program. AHA is postponing the development and implementation of this initiative until FY 2009. | Postponed | PP | | | √ | √ | Housing Choice Administration |
| Standards for Residency in Single Family Homes | Single Family Unit Residency/Homeownership Standards<br><br>Standards for Residency in Single Family Home | AHA will adopt and implement single family home eligibility standards (1-4 units) to assure that families are prepared financially and otherwise to live in single family homes and be successful in neighborhoods. | Priority | P | | √ | √ | √ | Housing Choice Administration |
| Homeownership Standards | Single Family Unit Residency/Homeownership Standards | AHA will review and refine certain eligibility criteria and standards for using the voucher for homeownership and open the voucher waiting list for families that demonstrate homeownership readiness. | Priority | P | | √ | √ | √ | Housing Choice Administration |

**P** - Planning Phase, **I** - Implementation Phase, **PP** - Postponed

**EXHIBIT EO-1-A**
**Atlanta Housing Authority (AHA)**
**FY 2008 CATALYST Activities Directory**
**4/20/2007**

| Supporting Activity Name | Former Activity Name(s), If Applicable | FY 2008 Activity Description | FY 2008 Prioritization | Status as of 1/31/07 | FY 2005 | FY 2006 | FY 2007 | FY 2008 | Business Line |
|---|---|---|---|---|---|---|---|---|---|
| Intake/Waitlist Re-engineering | | AHA will design and implement a new intake process to align with CATALYST eligibility requirements. AHA will procure a third party vendor during FY 2008 to purge the existing Housing Choice waiting list to assure that all applicants are compliant and/or exempt from the work/program participation requirement. | Priority | P | | | √ | √ | Housing Choice Administration |
| Housing Choice Fair Market Rent Standards | Setting Market Rents Under Housing Choice Program | AHA has developed its own Payment Standards based on local market conditions and identified submarkets that exist within the City of Atlanta. Utilizing a third party Real Estate Market Research firm, the submarkets were determined in FY 2007, and in FY 2008 separate payment standard schedules will be implemented for each of the identified submarkets in the City of Atlanta upon establishment of new contracts and at the next recertification for existing contracts. | Priority | P | | √ | √ | √ | Housing Choice Administration |
| Program Moves | Residential Moves | During FY 2007, AHA began implementing strategies to reduce the number of moves participants make while in the program. AHA will allow moves only for a limited number of reasons, including, but not limited to, emergencies and foreclosures. During FY 2008, AHA will continue to implement and refine these strategies as part of its routine operations. | Ongoing | I | | √ | √ | √ | Housing Choice Administration |
| AHA Standards and Incoming/Outbound Ports | Modifications to Participant Portability Standards<br><br>AHA Standards and Outgoing Ports<br><br>AHA Standards and Incoming/Outgoing Ports | During FY 2008, AHA will work with the Housing Authority of Fulton County (HAFC) to develop a demonstration to enforce CATALYST and other MTW requirements on all AHA voucher holders ported to Fulton County. AHA will not establish limits on the number of families who can port but will apply Program Move guidelines to participants who desire to port out. In addition, inbound portability will only be accepted if the household is in full compliance with the work/program participation provisions and other CATALYST criteria. | Priority | P | √ | √ | √ | √ | Housing Choice Administration |
| Housing Choice Fixed Subsidy Initiative | | During FY 2008, AHA will implement changes in recertification requirements for certain households that have an interim income change. All interim reporting will be eliminated and a single annual and/or bi-annual recertification process will be implemented. AHA will conduct a rent impact analysis, obtain necessary Board of Commissioners approval, and submit the information to HUD as required by its MTW Agreement. Fixed deductions will be initiated pursuant to the impact analysis. | Priority | P | | | √ | √ | Housing Choice Administration |



**P** - Planning Phase, **I** - Implementation Phase, **PP** - Postponed

| Supporting Activity Name | Former Activity Name(s), If Applicable | FY 2008 Activity Description | FY 2008 Prioritization | Status as of 1/31/07 | FY 2005 | FY 2006 | FY 2007 | FY 2008 | Business Line |
|---|---|---|---|---|---|---|---|---|---|
| Enhanced Business Systems (Family Obligations Document Enforcement, Enhanced Criminal Screening, and Health and Safety Standards | | As part of its Housing Choice Reform initiative, AHA will continue to refine the business processes associated with implementing CATALYST policies in the Housing Choice program. Enhanced business systems for implementing CATALYST policies, enhanced criminal screening and health and safety standards are established and will continue to be implemented as a part of Housing Choice routine operations during FY 2008. | Priority | I | √ | √ | √ | √ | Housing Choice Administration |
| Elderly Income Disregard | | On October 1, 2004, AHA implemented an income disregard for the Public Housing and Housing Choice programs for employment income earned by elderly residents or participants on fixed income. AHA will continue to recognize and implement this income disregard as part of its routine operations during FY 2008. | Ongoing | I | √ | √ | √ | √ | Housing Choice Administration |
| $125 Minimum Rent | Minimum Rent | AHA will keep its minimum rent at this level for FY 2008, and will continue to implement the $125 minimum rent as part of its routine operations during FY 2008. | Ongoing | I | √ | √ | √ | √ | Housing Choice Administration |
| Housing Choice Landlord Certification and Training | | AHA is delaying its plans to develop a mandatory Landlord Certification and Training Program to educate landlords on the requirements for placing and maintaining their properties in the Housing Choice Program, until FY 2009. However, landlord briefings are being implemented in March of 2007 and will continue into FY 2008 with the objective of providing an informational approach to AHA landlord expectations and program participation requirements. | Priority | P | | √ | √ | √ | Housing Choice Administration |
| Housing Choice Inspection Fees | | AHA will charge landlords reasonable fees for pre-inspections and subsequent re-inspections following the initial re-inspection to cover the administrative costs associated with these additional inspections. Additionally, participant households may be charged a fee to cover the administrative costs of re-inspections due to certain deficiencies which are the responsibility of the household and remain unaddressed. AHA is delaying the implementation of this project. | Postponed | PP | | √ | √ | √ | Housing Choice Administration |



**P** - Planning Phase, **I** - Implementation Phase, **PP** - Postponed

| Supporting Activity Name | Former Activity Name(s), If Applicable | FY 2008 Activity Description | FY 2008 Prioritization | Status as of 1/31/07 | FY 2005 | FY 2006 | FY 2007 | FY 2008 | Business Line |
|---|---|---|---|---|---|---|---|---|---|
| Place-based and People-based Deconcentration Strategy | Deconcentration Plan<br><br>Deconcentration Strategy | AHA will develop and implement a deconcentration strategy with the goal of decreasing the number of Housing Choice assisted families residing in areas of concentrated poverty. Briefing information to voucher holders will be revised in FY 2008 to identify areas of lower concentration of poverty to assist families to make informed choices in selecting residential locations. Marketing will be implemented to increase the number of professionally managed multifamily properties in areas of lower poverty. Statistical reporting will be developed and implemented to support monitoring of voucher movement under this project until FY 2009. | Priority | P | √ | √ | √ | √ | Housing Choice Administration |
| Enhanced Real Estate Inspection Systems | | During FY 2008, AHA will continue to use its higher inspection standards for all subsidized units and integrate various inspection processes and systems. | Ongoing | I | | √ | √ | √ | Real Estate Management |
| Enhanced Relocation Process and Database | Enhanced Relocation Process | In FY 2008, the Consolidated Relocation Management System (CRMS) will be integrated into the ORACLE E-business suite and simplified to remove duplicate data now existent in the Housing Choice data system. We will continue to refine and develop reports to provide additional support to the QLI, and the Relocation Implementation Plan and Procedures Manual will be completed and used as the guidebook for all relocation staff. AHA will coordinate the relocation of family communities with Atlanta Public Schools and expand the use of strategic partners and stakeholders to assist with relocation in support of revitalization and QLI activities. | Ongoing | I | | √ | √ | √ | Housing Choice Administration |
| | | **Asset Management** | | | | | | | |
| Asset Management | Asset Management Systems | AHA will continue to develop and evolve the systems, processes and procedures and human resources to create its comprehensive and integrated asset management capacity, with an emphasis on technology-oriented solutions. During FY 2008, AHA will consolidate a number of functions related to its real estate assets and relationships through the ongoing development of a comprehensive asset management and account services relationship system. | Priority | P | | √ | √ | √ | Asset Management |



P - Planning Phase, I - Implementation Phase, PP - Postponed

EXHIBIT EO-1-A
**Atlanta Housing Authority (AHA)**
**FY 2008 CATALYST Activities Directory**
**4/20/2007**

| Supporting Activity Name | Former Activity Name(s), If Applicable | FY 2008 Activity Description | FY 2008 Prioritization | Status as of 1/31/07 | FY 2005 | FY 2006 | FY 2007 | FY 2008 | Business Line |
|---|---|---|---|---|---|---|---|---|---|
| Private Sector Innovation | Mixed-Income Communities "Working Laboratory" Initiative | The Owner Entities of the AHA-sponsored Mixed-Income Communities will use innovative approaches to achieve goals and objectives at their properties using AHA's Moving to Work flexibility.<br>* Conduct sponsored retreat with partners to identify opportunities for private sector innovation<br>* Create "Statement of Corporate Policies for Signature Communities and Related Investments" | Priority | P | | √ | √ | √ | Asset Management |
| Sustaining Mixed-Income Investments | Sustaining Mixed-Income Investments<br><br>Sustaining Mixed-Income Investments/Disposition of Public Housing Assisted Units at Mixed-Finance Communities | In order to promote the more effective and efficient operation of low income housing at AHA-sponsored Mixed-Income Communities, AHA will dispose of the public housing assisted units at these communities out from under the existing Annual Contributions Contract ("ACC"), as amended by the applicable Mixed-Finance Amendment to the ACC.<br>* Implement Summerdale as first demonstration project under this initiative | Priority | P | √ | √ | √ | √ | Asset Management |
| Innovative Subsidy Strategies | Explore Funding Switch/Rent Structure Subsidy Conversion | This supporting activity will provide innovative strategies for changing the Section 9 subsidy arrangement at AHA high-rise communities in a way that would benefit the most from a change in the subsidy structure. | Priority | P | √ | | √ | √ | Asset Management |
| Streamlining Property-Level Operations | Tax Credit Compliance Model | The central focus of this initiative is to streamline operating procedures at the property level by examining the various regulatory requirements that are attached to financing and funding development activities and looking for ways to reduce duplication of effort, obsolete systems, and powering up an approach that will allow AHA's business partners to provide data to AHA that can be used in meeting requirements in reporting back to HUD and other funding and equity sources.<br>* Bring in outside resource to survey various regulatory requirements and develop protocols for streamlining property-level operations and enhancing operating efficiencies | Ongoing | P | √ | √ | √ | √ | Asset Management |
| Fee-Based Contract Administration | | AHA earns ongoing administrative and incentive fees as a subcontractor to Georgia HAP Administrators (GA HAP), an eleven-agency consortium organized to provide project-based administration services to HUD. | Ongoing | I | | √ | √ | √ | Asset Management |
| Mark to Market Program | | As a Participating Administrative Entity, AHA conducts multi-family asset restructurings in Georgia and, in doing so, determines whether an asset should receive a rent reduction to market or enter into a debt restructuring to ensure that the asset will remain viable over a specified period of time, usually 20 years. | Ongoing | I | | √ | √ | √ | Asset Management |

| Supporting Activity Name | Former Activity Name(s), If Applicable | FY 2008 Activity Description | FY 2008 Prioritization | Status as of 1/31/07 | FY 2005 | FY 2006 | FY 2007 | FY 2008 | Business Line |
|---|---|---|---|---|---|---|---|---|---|
| Oversight of Turnkey III Assets | Close-Out of Turnkey III Homebuyers Program | AHA will continue to provide oversight to homeownership communities established under the Turnkey III program. | Ongoing | I | | √ | √ | √ | Asset Management |
| | | Human Development | | | | | | | |
| Human Development | | AHA will continue to facilitate and provide linkages for AHA-assisted families to human development and support services providers with goals of (a) economically independent families; (b) educated children; and (c) self-sufficient elderly and disabled persons. | Ongoing | I | | √ | √ | √ | Real Estate Management |
| Work/Program Participation Requirement | Program Requirements<br>Work Requirement<br>Program Participation Requirement | AHA will continue its work policy generally requiring that at least one non-disabled, non-elderly adult in the household work full-time at least 30 hours per week, and that all other non-disabled, non-elderly adults be in a combination of training programs or school. | Priority | I | √ | √ | √ | √ | Real Estate Management |



**P** - Planning Phase, **I** - Implementation Phase, **PP** - Postponed

| Supporting Activity Name | Former Activity Name(s), If Applicable | FY 2008 Activity Description | FY 2008 Prioritization | Status as of 1/31/07 | FY 2005 | FY 2006 | FY 2007 | FY 2008 | Business Line |
|---|---|---|---|---|---|---|---|---|---|
| Connections to Service Provider Network | | During FY 2008, AHA will continue to explore ways to improve the process of connecting AHA-assisted families to needed services. The agency will particularly develop ways to better connect the "hardest to serve" population who are often plagued with undiagnosed mental illness and illiteracy. AHA also plans to expand its contractual relationship with AWDA to serve as the "Section 3 Clearinghouse" for training and preparing AHA clients and client-owned businesses and matching them with employment and contract opportunities offered by AWDA business partners and AHA contractors. | Priority | I | | √ | √ | √ | Real Estate Management |
| Service Provider Network | | During FY 2008, AHA will continue to identify funding to support the work of the SPN and assist member organizations in developing programs and services to meet the ongoing needs of AHA-assisted families. AHA will also identify additional service providers that offer job training/placement services, and mental health and counseling services to meet the needs of those families that are hardest to serve. In addition, AHA will recruit quality service providers from predominant areas where AHA-assisted families reside. | Priority | I | | √ | √ | √ | Real Estate Management |
| CATALYST Resource Guide | CATALYST Resource Access Guide | AHA will continue to publish and distribute the CATALYST Resource Guide which provides information on organizations which offer educational services, disability services, employment and training, homeownership counseling services, childcare, and senior supportive services. During FY 2008, AHA will develop a metro-wide guide focusing on resources in predominant areas where families reside. | Priority | I | | √ | √ | √ | Real Estate Management |
| Housing Choice Family Self-Sufficiency Program Re-engineering | Housing Choice Family Self-Sufficiency (FSS) Program | During FY 2008, AHA will close out the former HUD FSS Program and develop a new simplified FSS Program. The new FSS Program will be marketed to tenant-based and project-based voucher participants as well as to AHA public housing assisted tenants at the Affordable Communities and Signature Properties. The newly designed FSS Program will provide a flat escrow available only towards the purchase of a home. | Priority | P | | | √ | √ | Housing Choice Administration |
| Human Development and Support Services | Human Services Management<br><br>Client Services | AHA decided several years ago that a critical component to the relocation process was investing in the affected residents during the development period, so that families would have an opportunity to work through any barriers to family or individual success in the newly revitalized community, in their new community with the Housing Choice voucher, or in another public housing assisted community. | Priority | I | √ | √ | √ | √ | Real Estate Development & Acquisitions |



P - Planning Phase, I - Implementation Phase, PP - Postponed

EXHIBIT EO-1-A
**Atlanta Housing Authority (AHA)**
**FY 2008 CATALYST Activities Directory**
**4/20/2007**

| Supporting Activity Name | Former Activity Name(s), If Applicable | FY 2008 Activity Description | FY 2008 Prioritization | Status as of 1/31/07 | FY 2005 | FY 2006 | FY 2007 | FY 2008 | Business Line |
|---|---|---|---|---|---|---|---|---|---|
| Atlanta Community Scholars Awards | | Launched in 2003, the Atlanta Community Scholars Awards (ACSA) is an Atlanta Housing Authority (AHA) initiative which provides post secondary scholarships to eligible AHA residents to attend the college, university or technical school of their choice. The goal of ACSA is to encourage more youth assisted by AHA to consider and pursue higher education in preparation for the workforce. | **Ongoing** | I | | | | √ | Real Estate Management |
| Customer and Community Relations | | AHA will continue the implementation of the customer and community relations phone line (1-888-AHA-4YOU) in order to effectively respond to citizen concerns and compliments regarding Housing Choice participants in their neighborhoods. | **Ongoing** | I | | | | √ | Real Estate Management |
| Good Neighbor Program II | Good Neighbor Program | AHA's Good Neighbor Program (GNP) is designed to coach and prepare AHA-assisted families to live and blend into the communities where they live and help them to understand and value their roles and responsibilities as good neighbors. The training will continue to be provided by Georgia State University during FY 2008. | **Priority** | I | | √ | √ | √ | Housing Choice Administration |
| Individual Development Accounts (IDAs) | | In implementing this initiative, AHA plans to eliminate the existing earned income disregard and replace it with Individual Development Accounts (IDA) program for public housing assisted residents who are 18 to 61 years of age and who meet certain requirements. AHA has postponed the development and implementation of this program during FY 2009 | **Postponed** | PP | | √ | √ | √ | Real Estate Management |
| School Attendance Requirement | | During FY 2006, the Georgia state legislature passed a law that requires minors to be in school in order to receive a work permit. Because of this new law, AHA eliminated its FY 2005 requirement that 16 and 17 year olds work full-time if they are not in school and instead require all minors under 18 years of age to attend school as a condition of the household maintaining or receiving subsidy assistance. Although AHA has postponed the development and implementation of this initiative, the agency will continue to strengthen our partnership with Atlanta Public Schools, and will undertake a more aggressive enforcement of the lease requirement for youth to attend school. | **Postponed** | PP | | √ | √ | √ | Real Estate Management |

| Supporting Activity Name | Former Activity Name(s), If Applicable | FY 2008 Activity Description | FY 2008 Prioritization | Status as of 1/31/07 | FY 2005 | FY 2006 | FY 2007 | FY 2008 | Business Line |
|---|---|---|---|---|---|---|---|---|---|
| Place-Based Supportive Services Strategy Pilot | | In partnership with AHA, the Atlanta Regional Commission (ARC) secured a $375,000 ROSS (Resident Opportunities and Self-Sufficiency) grant during FY 2007 that it will use to expand the focus of the NORC project to two additional AHA high-rise communities, namely, Cheshire Bridge Road and Piedmont Road. In addition, the NORC will be coordinating a "Leadership Marian" project to provide training to residents on leadership development, diversity, conflict resolution, team building and community development. A trained facilitator and translators will be hired to assist with developing better relationships and leadership among the residents at Marian Road and building strong "resident ambassadors" that can continue to keep the diverse ethnic population at Marian Road engaged and involved in the community | Ongoing | I | | √ | √ | √ | Real Estate Management |
| **Ongoing Business Operations** | | | | | | | | | |
| Asset Management Under the New Operating Subsidy Rule | | Throughout its MTW Agreement period, AHA will continue to exercise its regulatory flexibility as to how it has implemented project-based accounting, project-based management and asset management systems as contemplated under HUD's recently adopted Asset Management/Project Based Accounting Rule. | Priority | I | √ | √ | √ | √ | Corporate Support |
| Project Based Accounting and Financial Systems | Project-Based Accounting and Financial Systems/Quarterly Financial Statements by Business Line | In FY 2008, further improvements will be made to AHA's information technology/financial reporting environment to expand beyond the property level. These and other enhancements to AHA's ORACLE automated system will also allow AHA to produce quarterly financial statements across the entire organization for all program operations. | Priority | I | | √ | √ | √ | Corporate Support |
| Fee-for-Service Methodology | | Under this system, AHA charges each property, program, or grant a fixed rate for administration and will continue the implementation of this methodology throughout the life of its MTW Agreement. AHA will continue to implement and refine the methodology in FY 2008. | Priority | I | | √ | √ | √ | Corporate Support |
| Utility Allowance Waiver | | Based on the existing condition of the AHA real estate portfolio including aging building infrastructures, minimum insulation and poor air circulation, AHA will consider adjusting the tenant utility allowances to account for the utility usage required to maintain quality of life. | Priority | P | | | √ | √ | Corporate Support |

| Supporting Activity Name | Former Activity Name(s), If Applicable | FY 2008 Activity Description | FY 2008 Prioritization | Status as of 1/31/07 | FY 2005 | FY 2006 | FY 2007 | FY 2008 | Business Line |
|---|---|---|---|---|---|---|---|---|---|
| Energy Performance Contracting | | In light of the dynamic impact of AHA's revitalization program and Quality of Life Initiative on the ongoing operations of AHA-owned public housing assisted properties, AHA will consider establishing and managing its own energy performance program. This program may include, but will not be limited to, self-financing and implementing additional improvements at properties that AHA will continue to own and operate on a long-term basis. | Ongoing | P | | | | √ | Corporate Support |
| Procurement Enhancements | | AHA will continue to comply with procurement regulations at 24 C.F.R. 85.36 as modified by other applicable regulations and by AHA's MTW Agreement and related agreements, implementation protocols, and applicable waivers. However, AHA will continue to make enhancements to its procurement policies and procedures to improve efficiency and effectiveness. AHA set its micro-purchasing level at $5,000 and will utilize contracts with terms in excess of five years for strategic services. | Ongoing | I | | | | √ | Corporate Support |
| Financial Operations/Single Fund/MTW Block Grant Management | | During FY 2008, AHA will continue to combine the income from three programs into a Single Fund in carrying out the activities of its MTW Agreement and related Plans and implementation protocols. Low income Operating Subsidy and related income from property operations, Housing Choice Voucher Income, and Capital Fund Program Income will be used interchangeably for eligible MTW purposes. AHA will also use other program funds such as HOPE VI, and Development Grants, to carry out activities related to those grants which are aligned with AHA's Business Plan. | Priority | I | √ | √ | √ | √ | Corporate Support |
| Enhanced Accessibility Initiative | Accessibility | AHA is committed to making its facilities and programs accessible to persons with disabilities. AHA's commitment is reflected in its Accessibility Policies included in its Statement of Corporate Policies Governing the Leasing and Residency of Assisted Apartments (Statement of Corporate Policies) – (**Appendix N**) and Housing Choice Administrative Plan – (**Appendix O**). As part of AHA's strategy for accomplishing these efforts, AHA will implement activities pursuant to a voluntary compliance agreement with HUD, a four-year agreement which became effective on March 15, 2007. | Priority | I | | | √ | √ | Real Estate Management |
| Corporate Policies Governing Eligibility, Occupancy, and Program Administration | Statement of Corporate Policies Governing the Leasing and Residency of Assisted Apartments | AHA continues to revise its policy documents to incorporate policy changes supporting its Business Plan. | Ongoing | I | √ | √ | √ | √ | Corporate Support |



**P** - Planning Phase, **I** - Implementation Phase, **PP** - Postponed

| Supporting Activity Name | Former Activity Name(s), If Applicable | FY 2008 Activity Description | FY 2008 Prioritization | Status as of 1/31/07 | FY 2005 | FY 2006 | FY 2007 | FY 2008 | Business Line |
|---|---|---|---|---|---|---|---|---|---|
| 4 to 1 Elderly Admissions Preference | Elderly Admissions Preference | This admissions preference allows the PMCOs to admit 4 elderly (62 and older) or almost elderly (55-61) residents on the waiting list before admitting a young disabled resident until such time as an optimal mix of elderly/almost elderly and young disabled residents is reached for the community. | Priority | I | √ | √ | √ | √ | Real Estate Management |
| Permanent Designated Housing | | AHA plans to designate one or more of the communities listed in **Appendix P** as percentage-based mixed population, elderly only or non-elderly disabled only. AHA will implement permanent designations for existing units to support the repositioning of its senior high-rise communities and for new units in the development of designated housing in connection with its revitalization efforts | Priority | I | √ | √ | √ | √ | Real Estate Development & Acquisitions |
| Affordable Fixed Rent Demonstration | Affordable Flat Rent Demonstration | AHA will use research and financial analysis conducted in FY 2007 to select one or more of its conventional public housing communities for participation in an affordable fixed rent demonstration that AHA will launch during FY 2008. | Priority | P | √ | √ | √ | √ | Real Estate Management |
| Enhanced Business Systems | Clean and Safe Environment<br><br>Enhanced Business Systems (Lease Enforcement, Enhanced Criminal Screening, and Health and Safety Standards) | AHA/PMCO team continues enforcement of stricter lease standards, criminal screening, and health and safety standards. | Priority | I | √ | √ | √ | √ | Real Estate Management |
| Elderly Income Disregard | | AHA will continue to implement an income disregard that excludes employment income earned by elderly residents or participants on fixed income. | Priority | I | √ | √ | √ | √ | Real Estate Management |
| $125 Minimum Rent | Minimum Rent | AHA will continue its minimum rent of $125. Households on fixed incomes, where all members are either elderly or disabled, are exempt from the minimum rent increase and will pay based on 30% of their adjusted gross incomes. | Priority | I | √ | √ | √ | √ | Real Estate Management |

**P** - Planning Phase, **I** - Implementation Phase, **PP** - Postponed

| Supporting Activity Name | Former Activity Name(s), If Applicable | FY 2008 Activity Description | FY 2008 Prioritization | Status as of 1/31/07 | FY 2005 | FY 2006 | FY 2007 | FY 2008 | Business Line |
|---|---|---|---|---|---|---|---|---|---|
| Enhanced Real Estate Inspection Systems | | AHA will continue to refine and improve the quality assurance (QA) inspections process for AHA-owned communities. Through its integrated inspections system, AHA will continue to inspect units at each of its communities, at least once per year. | Ongoing | I | | √ | √ | √ | Real Estate Management |
| Comcast Cable Partnership | | Use technology at high-rises to improve quality of life for elderly & disabled by giving access to two primary cable channels: Security channel carries security camera feeds; Info channel broadcasts alerts and other announcements. | Ongoing | I | | √ | √ | √ | Real Estate Management |
| Video Call Down Systems | | Complete installation of video call down systems at AHA family communities and assess impact on community security post-implementation. | Ongoing | I | | √ | √ | √ | Real Estate Management |
| Organizational Initiatives | Communications Plan<br>Corporate Culture Project<br>Human Resources Development | Includes Corporate Culture Project, Human Resources Development & Communications Plan | Ongoing | I | | √ | √ | √ | Corporate Support |
| Measuring Success – Moving to Work | | The Boston Research Group will continue to measure the impact of AHA's Moving to Work Program on the quality of life, levels of crime, poverty, & other social ills associated with concentrated poverty. | Priority | I | | √ | √ | √ | Corporate Support |



**P** - Planning Phase, **I** - Implementation Phase, **PP** - Postponed

## Atlanta Housing Authority (the "PHA")
## Moving To Work (MTW) Demonstration Program
## Certification for FY 2008 MTW Annual Plan

1. The PHA held a public hearing regarding the Plan on April 19, 2007.
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.
13. The PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41 (Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped).
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: 4-19-07
Board of Commissioners Chairperson

# DISCLOSURE OF LOBBYING ACTIVITIES

Complete this form to disclose lobbying activities pursuant to 31 U.S.C. 1352
(See reverse for public burden disclosure.)

Approved by OMB
0348-0046

**1. Type of Federal Action:** a
a. contract
b. grant
c. cooperative agreement
d. loan
e. loan guarantee
f. loan insurance

**2. Status of Federal Action:** n/a
a. bid/offer/application
b. initial award
c. post-award

**3. Report Type:** a
a. initial filing
b. material change
**For Material Change Only:**
year ______ quarter ______
date of last report ______

**4. Name and Address of Reporting Entity:**
[x] Prime [ ] Subawardee
Tier ______, *if known*:

**Congressional District**, *if known*: 5th

**5. If Reporting Entity in No. 4 is a Subawardee, Enter Name and Address of Prime:**

n/a

**Congressional District**, *if known*:

**6. Federal Department/Agency:**

U.S. Department of Housing and Urban Development

**7. Federal Program Name/Description:**

Moving to Work Demonstration Program

CFDA Number, *if applicable*: n/a

**8. Federal Action Number,** *if known*:

**9. Award Amount,** *if known*:

$ n/a

**10. a. Name and Address of Lobbying Registrant** (*if individual, last name, first name, MI*):

**b. Individuals Performing Services** (*including address if different from No. 10a*) (*last name, first name, MI*):

**11.** Information requested through this form is authorized by title 31 U.S.C. section 1352. This disclosure of lobbying activities is a material representation of fact upon which reliance was placed by the tier above when this transaction was made or entered into. This disclosure is required pursuant to 31 U.S.C. 1352. This information will be reported to the Congress semi-annually and will be available for public inspection. Any person who fails to file the required disclosure shall be subject to a civil penalty of not less that $10,000 and not more than $100,000 for each such failure.

Signature: ______
Print Name: Renée Lewis Glover
Title: President & Chief Executive Officer
Telephone No.: (404) 817-7463 Date: ______

**Federal Use Only:**

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Standard Form LLL (Rev. 7-97)

# INSTRUCTIONS FOR COMPLETION OF SF-LLL, DISCLOSURE OF LOBBYING ACTIVITIES

This disclosure form shall be completed by the reporting entity, whether subawardee or prime Federal recipient, at the initiation or receipt of a covered Federal action, or a material change to a previous filing, pursuant to title 31 U.S.C. section 1352. The filing of a form is required for each payment or agreement to make payment to any lobbying entity for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with a covered Federal action. Complete all items that apply for both the initial filing and material change report. Refer to the implementing guidance published by the Office of Management and Budget for additional information.

1. Identify the type of covered Federal action for which lobbying activity is and/or has been secured to influence the outcome of a covered Federal action.
2. Identify the status of the covered Federal action.
3. Identify the appropriate classification of this report. If this is a followup report caused by a material change to the information previously reported, enter the year and quarter in which the change occurred. Enter the date of the last previously submitted report by this reporting entity for this covered Federal action.
4. Enter the full name, address, city, State and zip code of the reporting entity. Include Congressional District, if known. Check the appropriate classification of the reporting entity that designates if it is, or expects to be, a prime or subaward recipient. Identify the tier of the subawardee, e.g., the first subawardee of the prime is the 1st tier. Subawards include but are not limited to subcontracts, subgrants and contract awards under grants.
5. If the organization filing the report in item 4 checks "Subawardee," then enter the full name, address, city, State and zip code of the prime Federal recipient. Include Congressional District, if known.
6. Enter the name of the Federal agency making the award or loan commitment. Include at least one organizational level below agency name, if known. For example, Department of Transportation, United States Coast Guard.
7. Enter the Federal program name or description for the covered Federal action (item 1). If known, enter the full Catalog of Federal Domestic Assistance (CFDA) number for grants, cooperative agreements, loans, and loan commitments.
8. Enter the most appropriate Federal identifying number available for the Federal action identified in item 1 (e.g., Request for Proposal (RFP) number; Invitation for Bid (IFB) number; grant announcement number; the contract, grant, or loan award number; the application/proposal control number assigned by the Federal agency). Include prefixes, e.g., "RFP-DE-90-001."
9. For a covered Federal action where there has been an award or loan commitment by the Federal agency, enter the Federal amount of the award/loan commitment for the prime entity identified in item 4 or 5.
10. (a) Enter the full name, address, city, State and zip code of the lobbying registrant under the Lobbying Disclosure Act of 1995 engaged by the reporting entity identified in item 4 to influence the covered Federal action.

    (b) Enter the full names of the individual(s) performing services, and include full address if different from 10 (a). Enter Last Name, First Name, and Middle Initial (MI).
11. The certifying official shall sign and date the form, print his/her name, title, and telephone number.

# Certification for a Drug-Free Workplace

U.S. Department of Housing and Urban Development

Applicant Name

The Housing Authority of the City of Atlanta, Georgia (AHA)

Program/Activity Receiving Federal Grant Funding

Moving To Work Demonstration Program

Acting on behalf of the above named Applicant as its Authorized Official, I make the following certifications and agreements to the Department of Housing and Urban Development (HUD) regarding the sites listed below:

I certify that the above named Applicant will or will continue to provide a drug-free workplace by:

a. Publishing a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the Applicant's workplace and specifying the actions that will be taken against employees for violation of such prohibition.

b. Establishing an on-going drug-free awareness program to inform employees ---

(1) The dangers of drug abuse in the workplace;

(2) The Applicant's policy of maintaining a drug-free workplace;

(3) Any available drug counseling, rehabilitation, and employee assistance programs; and

(4) The penalties that may be imposed upon employees for drug abuse violations occurring in the workplace.

c. Making it a requirement that each employee to be engaged in the performance of the grant be given a copy of the statement required by paragraph a.;

d. Notifying the employee in the statement required by paragraph a. that, as a condition of employment under the grant, the employee will ---

(1) Abide by the terms of the statement; and

(2) Notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction;

e. Notifying the agency in writing, within ten calendar days after receiving notice under subparagraph d.(2) from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to every grant officer or other designee on whose grant activity the convicted employee was working, unless the Federalagency has designated a central point for the receipt of such notices. Notice shall include the identification number(s) of each affected grant;

f. Taking one of the following actions, within 30 calendar days of receiving notice under subparagraph d.(2), with respect to any employee who is so convicted ---

(1) Taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or

(2) Requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a Federal, State, or local health, law enforcement, or other appropriate agency;

g. Making a good faith effort to continue to maintain a drug-free workplace through implementation of paragraphs a. thru f.

**2. Sites for Work Performance.** The Applicant shall list (on separate pages) the site(s) for the performance of work done in connection with the HUD funding of the program/activity shown above: Place of Performance shall include the street address, city, county, State, and zip code. Identify each sheet with the Applicant name and address and the program/activity receiving grant funding.)

See Attachment

Check here ☐ if there are workplaces on file that are not identified on the attached sheets.

I 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)

| Name of Authorized Official | Title |
|---|---|
| Renée Lewis Glover | President & Chief Executive Officer |
| Signature X | Date |

## Item 2. Certification for a Drug-Free Workplace Attachment

## The Housing Authority of the City of Atlanta, Georgia ("AHA")

## Sites for Work Performance*

### AHA Communities:

| Community | Street Address | City, State, Zip Code |
|---|---|---|
| 1. Antoine Graves | 126 Hilliard Street | Atlanta, Georgia 30312 |
| 2. Bankhead Courts | 3400 Maynard Court | Atlanta, Georgia 30331 |
| 3. Barge Road | 2440 Barge Road | Atlanta, Georgia 30331 |
| 4. Bowen Apartments | 2804 Yates Drive | Atlanta, Georgia 30318 |
| 5. Capitol Homes | 89 Memorial Drive | Atlanta, Georgia 30312 |
| 6. Cheshire Bridge Road | 2170 Cheshire Bridge Road | Atlanta, Georgia 30324 |
| 7. Cosby Spear Towers | 355 North Avenue | Atlanta, Georgia 30308 |
| 8. East Lake Towers | 380 East Lake Boulevard | Atlanta, Georgia 30317 |
| 9. Englewood Manor | 1271 Gault Street | Atlanta, Georgia 30315 |
| 10. Georgia Avenue | 174 Georgia Avenue | Atlanta, Georgia 30312 |
| 11. Grady Homes | 100 Bell Street | Atlanta, Georgia 30312 |
| 12. Graves Annex | 110 Hilliard Street | Atlanta, Georgia 30312 |
| 13. Herndon Homes | 511 John Street | Atlanta, Georgia 30311 |
| 14. Hightower Manor | 2610 M.L. King Drive | Atlanta, Georgia 30311 |
| 15. Hollywood Courts | 2515 Hollywood Court | Atlanta, Georgia 30318 |
| 16. John Hope Model Building | 365 McDaniel Street | Atlanta, Georgia 30314 |
| 17. John O. Chiles | 435 Joseph E. Lowery | Atlanta, Georgia 30310 |
| 18. Jonesboro North | 2471 Jonesboro Road | Atlanta, Georgia 30315 |
| 19. Jonesboro South | 2471 Jonesboro Road | Atlanta, Georgia 30315 |
| 20. Juniper & 10th | 150 Tenth Street | Atlanta, Georgia 30309 |
| 21. Leila Valley | 2413 Leila Lane | Atlanta, Georgia 30315 |
| 22. McDaniel Glenn | 531 McDaniel Street | Atlanta, Georgia 30312 |
| 23. M.L. King Tower | 525 Whitehall Terrace | Atlanta, Georgia 30312 |
| 24. Marian Road | 760 Sidney Marcus Boulevard | Atlanta, Georgia 30324 |
| 25. Marietta Road | 2295 Marietta Road | Atlanta, Georgia 30318 |
| 26. Martin Street Plaza | 600 Martin Street | Atlanta, Georgia 30312 |
| 27. Palmer House | 430 Centennial Olympic Park Drive | Atlanta, Georgia 30313 |
| 28. Peachtree Road | 2240 Peachtree Road | Atlanta, Georgia 30309 |
| 29. Piedmont Road | 3601 Piedmont Road | Atlanta, Georgia 30305 |
| 30. Roosevelt House | 582 Centennial Olympic Park Drive | Atlanta, Georgia 30313 |
| 31. Thomasville Heights | 1038 Henry Thomas Drive | Atlanta, Georgia 30315 |
| 32. U-Rescue Villa | 355 North Avenue | Atlanta, Georgia 30308 |
| 33. University Homes | 660 Fair Street | Atlanta, Georgia 30314 |
| 34. Westminster | 1422 Piedmont Avenue | Atlanta, Georgia 30309 |

** All sites are located in Fulton County except East Lake Towers, Columbia Village, and The Villages of East Lake which are located in Dekalb County.*

## AHA Sponsored Mixed-Income, Mixed-Finance Communities:

| Community | Street Address | City, State, Zip Code |
|---|---|---|
| 1. Ashley Courts at Cascade | 1371 Kimberly Way | Atlanta, Georgia 30331 |
| 2. Ashley Terrace at West End | 717 Lee Street | Atlanta, Georgia 30310 |
| 3. Centennial Place | 526 Centennial Olympic Park Drive | Atlanta, Georgia 30313 |
| 4. CollegeTown at West End | 920 Sells Avenue | Atlanta, Georgia 30310 |
| 5. Columbia Commons | 2524 Martin Luther King, Jr. Drive | Atlanta, Georgia 30311 |
| 6. Columbia Village | 100 Jessica Avenue | Atlanta, Georgia 30032 |
| 7. Magnolia Park | 60 Paschal Boulevard | Atlanta, Georgia 30314 |
| 8. Summerdale Commons | 2745 Hapeville Road | Atlanta, Georgia 30315 |
| 9. The Village at Castleberry Hill | 600 Greensferry Avenue | Atlanta, Georgia 30314 |
| 10. The Villages at Carver | 201 Moury Avenue | Atlanta, Georgia 30315 |
| 11. The Villages of East Lake | 460 East Lake Boulevard | Atlanta, Georgia 30317 |
| 12. West Highlands at Heman E. Perry Boulevard | 18101 Kerry Drive | Atlanta, Georgia 30318 |

## Project-Based Section 8 Properties:

| Community | Street Address | City, State, Zip Code |
|---|---|---|
| 1. Campbell Stone Apartments | 2922 Pharr Court South | Atlanta, Georgia 30305 |
| 2. Columbia Colony | 2999 Continental Colony Parkway | Atlanta, Georgia 30331 |
| 3. Columbia Heritage | 1900 Perry Boulevard | Atlanta, Georgia 30318 |
| 4. Columbia High Point | 220 Bowen Circle | Atlanta, Georgia 30315 |
| 5. Constitution | 2120 Forrest Park Road | Atlanta, Georgia 30315 |
| 6. Crogman School | 1093 West Avenue | Atlanta, Georgia 30305 |
| 7. Hampton Oaks | 1955 Ladawn Lane | Atlanta, Georgia 30318 |
| 8. Heritage Green | 2891 Springdale Road | Atlanta, Georgia 30315 |
| 9. Northside Village (Gateway) | 519 Western Avenue | Atlanta, Georgia 30318 |
| 10. Park Place South | 266 Amal Drive | Atlanta, Georgia 30315 |
| 11. The Park at Scott's Crossing | 1620 Hollywood Road | Atlanta, Georgia 30318 |
| 12. The Peaks at MLK | 2423 M.L.K., Jr. Drive | Atlanta, Georgia 30311 |
| 13. The Terraces | 40 Mount Zion Road | Atlanta, Georgia 30354 |
| 14. The Veranda at CollegeTown | 920 Sells Avenue | Atlanta, Georgia 30314 |
| 15. Toby Sexton/GE Towers | 488 Glenn Street | Atlanta, Georgia 30310 |

**AHA Central Office:**

The Housing Authority of the City of Atlanta, Georgia
230 John Wesley Dobbs Avenue, NE
Atlanta, Georgia 30303

**Additional AHA Facilities:**

The Housing Authority of the City of Atlanta, Georgia
Central Warehouse
301 North Ave
Atlanta, Georgia 30365

The Housing Authority of the City of Atlanta, Georgia
Facilities Maintenance Shop
568 Humphries Street
Atlanta, Georgia 30312

The Housing Authority of the City of Atlanta, Georgia
Facilities Maintenance Shop
749 McDaniel Street
Atlanta, Georgia 30310

## Appendix U: Submissions Required for Receipt of Funds

- *Fiscal Year 2008 Comprehensive Operating and Capital Fund Budget (Also included in Appendix L)*
- *Form HUD-52723 – Operating Fund; Calculation of Operating Subsidy*
- *Annual Statement/Performance and Evaluation Report: Capital Fund Program and Replacement Housing Factor*[1]

[1] The Performance and Evaluation forms (P&Es) submitted with this plan for the Capital Funding Program and Replacement Housing Factor funds represent an estimate of awards in Federal Fiscal Year 2007 based on prior funding and changes in public housing inventory. They do not reflect the capital or development needs of the Atlanta Housing Authority. AHA expects that HUD will provide the actual levels of funding in August or September 2007 when the awards are published. At that time, AHA will submit revised P&Es reflecting the actual award amounts.

# Fiscal Year 2008 Comprehensive Operating and Capital Budget

## *The Housing Authority of the City of Atlanta, Georgia*

Atlanta Housing Authority

## To be submitted to the Board of Commissioners June 27, 2007*

| AHA Programs | MTW Funds | Development, HOPE VI, and RHF | Housing Choice non-MTW Vouchers | M2M | GA HAP | CDBG | Development and Other Fees | |
|---|---|---|---|---|---|---|---|---|
| **OPERATING REVENUES** | | | | | | | | |
| Rental Revenue | **$12,762,028** | | | | | | | $12,762,028 |
| Low Income Operating Subsidy | **30,000,000** | | | | | | | 30,000,000 |
| Housing Choice Operating Subsidy | **129,528,520** | | 4,775,658 | | | | | 134,304,178 |
| Capital Funds Program | **3,609,518** | | | | | | | 3,609,518 |
| Development, HOPE VI, and RHF grants used for Human Services, Relocations, and Adminstration | **0** | 2,700,000 | | | | | | 2,700,000 |
| Soft Grants | **0** | | | | | 17,000 | | 17,000 |
| Development and Transaction Fees | **0** | | | | | | 3,207,500 | 3,207,500 |
| Other Revenue | **1,197,184** | | | 50,000 | 1,576,160 | | | 2,823,344 |
| **Total Operating Income** | **$177,097,250** | **$2,700,000** | **$4,775,658** | **$50,000** | **$1,576,160** | **$17,000** | **$3,207,500** | **$189,423,568** |
| **Uses** | | | | | | | | |
| **OPERATING EXPENSES** | | | | | | | | |
| Administrative | **$45,544,713** | $2,700,000 | | 20,000 | 315,232 | 17,000 | | $48,596,945 |
| Housing Assistance Payments | **80,177,516** | | 5,233,632 | | | | | 85,411,148 |
| Resident Services | **7,523,380** | | | | | | | 7,523,380 |
| Utilities | **15,886,616** | | | | | | | 15,886,616 |
| Ordinary Maintenance and Operation | **13,504,068** | | | | | | | 13,504,068 |
| Protective Services | **4,965,706** | | | | | | | 4,965,706 |
| Deprogrammed Expenses | **1,759,015** | | | | | | | 1,759,015 |
| General Expenses (incl $1 million Contingency) | **3,483,250** | | | | | | | 3,483,250 |
| **PILOT** | **700,000** | | | | | | | 700,000 |
| **Total Operating Expenses** | **173,544,264** | **2,700,000** | **5,233,632** | **20,000** | **315,232** | **17,000** | **0** | **181,830,128** |
| | | | | | | | | |
| **NET OPERATING GAIN/(LOSS) before Depreciation** | **3,552,986** | **0** | **(457,974)** | **30,000** | **1,260,928** | **0** | **3,207,500** | **7,593,440** |
| Depreciation Expense | **11,660,253** | | | | | | | 11,660,253 |
| **NET OPERATING GAIN/(LOSS) after depreciation** | **(8,107,267)** | **0** | **(457,974)** | **30,000** | **1,260,928** | **0** | **3,207,500** | **(4,066,813)** |

# Fiscal Year 2008 Comprehensive Operating and Capital Budget

*The Housing Authority of the City of Atlanta, Georgia*

Atlanta Housing Authority

## To be submitted to the Board of Commissioners June 27, 2007*

| AHA Programs | MTW Funds | Development, HOPE VI, and RHF | Housing Choice non-MTW Vouchers | M2M | GA HAP | CDBG | Development and Other Fees | |
|---|---|---|---|---|---|---|---|---|
| **NON-OPERATING REVENUES** | | | | | | | | |
| Modernization and Capital Improvements | **8,690,482** | | | | | | | 8,690,482 |
| Interest Income | **2,406,220** | | | | | | | 2,406,220 |
| **Total Non-operating Revenues** | **11,096,702** | | | | | | | 11,096,702 |
| | | | | | | | | |
| **NON-OPERATING EXPENDITURES** | | | | | | | | |
| Loss on Sale of Fixed Asset | **19,643,186** | | | | | | | 19,643,186 |
| Demolition | **5,157,000** | | | | | | | 5,157,000 |
| Capital Improvements | **2,000,000** | | | | | | | 2,000,000 |
| Interest Expense | **233,856** | 682,500 | | | | | | 916,356 |
| Amortization of debt | **700,095** | | | | | | | 700,095 |
| **Total Non-operating Uses of Funds** | **27,734,137** | **682,500** | **0** | **0** | **0** | **0** | **0** | **28,416,637** |
| | | | | | | | | |
| **NET NON-OPERATING GAIN/(LOSS)** | **(16,637,435)** | **(682,500)** | **0** | **0** | **0** | **0** | **0** | **(17,319,935)** |
| | | | | | | | | |
| **CHANGE IN NET ASSETS BEFORE REVITALIZATION IMPACT** | **($24,744,703)** | **($682,500)** | **($457,974)** | **$30,000** | **$1,260,928** | **$0** | **$3,207,500** | **($21,386,749)** |
| Increase in Net Assets resulting from Revitalization | **0** | 32,367,000 | | | | | | **$32,367,000** |
| **CHANGE IN NET ASSETS AFTER REVITALIZATION IMPACT** | **($24,744,703)** | **$31,684,500** | **($457,974)** | **$30,000** | **$1,260,928** | **$0** | **$3,207,500** | **$10,980,251** |

* The Fiscal Year 2008 Comprehensive Operating and Capital Budget is scheduled to be presented to AHA's Board of Commissioners for approval on June 27, 2007. AHA will submit a revised table to HUD if substantial changes are made in the approved version.

# Operating Fund
# Calculation of Operating Subsidy
# PHA-Owned Rental Housing

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing

OMB Approval No. 2577-0029 (exp. 10/31/2008)

Public Reporting Burden for this collection of information is estimated to average .75 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. This agency may not collect this information, and you are not required to complete this form, unless it display a currently valid OMB control number. This information is required by Section 9(a) of the U.S. Housing Act of 1937, as amended, and by 24 CFR Part 990 HUD regulations. HUD makes payments for the operation and maintenance of low-income housing projects to PHAs. The Operating Fund determines the amount of operating subsidy to be paid to PHAs. PHAs provide information on the Project Expense Level (PEL), Utilities Expense Level (UEL), Other Formula Expenses (Add-ons) and Formula Income - the major Operating Fund components. HUD reviews the information to determine each PHA's Formula Amount and the funds to be obligated for the Funding Period to each PHA based on the appropriation by Congress. HUD also uses the information as the basis for requesting annual appropriations from Congress. Responses to the collection of information are required to obtain a benefit. The information requested does not lend itself to confidentiality.

## Section 1

**1. Name and Address of Public Housing Agency:**
Housing Authority of the City of Atlanta Georgia
230 John Wesley Dobbs N.E.
Atlanta, GA 30303

**2. Funding Period:** 01/01/2007 to 12/31/2007

**3. Type of Submission:** ☑ Original ☐ Revision No.

**4. ACC Number:** A-3107

**5. Fiscal Year End:** ☐ 12/31 ☐ 03/31 ☑ 06/30 ☐ 09/30

**6. Operating Fund Project Number:** **GA00600107D**

**7. DUNS Number:** 069189850

**8. ROFO Code:** 0401

**HUD Use Only**

## Section 2

**Calculation of ACC Units for 12-month period from July 1 to June 30 that is prior to the first day of the Funding Period:**

| | ACC Units on 7/1/2005 | Units Added to ACC (+) | Units Deleted from ACC (-) | ACC Units on 6/30/2006 (=) |
|---|---|---|---|---|
| Requested by PHA | 7,850 | 213 | 434 | 7,629 |
| HUD Modifications | | | | |

| Line No. | Category | Column A Unit Months: Req'd by PHA | Column A Unit Months: HUD Mod. | Column B Eligible Unit Months (EUMs): Req'd by PHA | Column B Eligible Unit Months (EUMs): HUD Mod. | Column C Resident Participation Unit Months: Req'd by PHA | Column C Resident Participation Unit Months: HUD Mod. |
|---|---|---|---|---|---|---|---|
| **Categorization of Unit Months:** | | | | | | | |
| **Occupied Unit Months** | | | | | | | |
| 01 | Occupied dwelling units -- by public housing eligible family under lease | 93,828 | | 93,828 | | 93,828 | |
| 02 | Occupied dwelling units -- by PHA employee, police officer, or other security personnel who is not otherwise eligible for public housing | 93 | | | | 93 | |
| 03 | New units -- eligible to receive subsidy during the Funding Period but not included on Lines 01, 02, or 05-13 of this section | 1,651 | | 1,651 | | 1,651 | |
| 04 | New units -- eligible to receive subsidy from 10/1 to 12/31 of previous funding period but not included on previous Calculation of Operating Subsidy | 0 | | 0 | | 0 | |
| **Vacant Unit Months** | | | | | | | |
| 05 | Units undergoing modernization | 40 | | 40 | | | |
| 06 | Special use units | 432 | | 432 | | | |
| 06a | Units on Line 02 that are occupied by police officers and that also qualify as special use units | | | 0 | | | |
| 07 | Units vacant due to litigation | 0 | | 0 | | | |
| 08 | Units vacant due to disasters | 0 | | 0 | | | |
| 09 | Units vacant due to casualty losses | 16 | | 16 | | | |
| 10 | Units vacant due to changing market conditions | 0 | | 0 | | | |
| 11 | Units vacant and not categorized above | 1,634 | | | | | |
| **Other ACC Unit Months** | | | | | | | |
| 12 | Units eligible for asset repositioning fee and still on ACC (occupied or vacant) | 11,412 | | | | | |
| 13 | All other ACC units not categorized above | 0 | | | | | |

| | | | | | | |
|---|---|---|---|---|---|---|
| | | | Operating Fund Project No.: | GA006000107D | | |
| **Calculations Based on Unit Months:** | | | | | | |
| 14 | Limited vacancies | | 1,634 | | | |
| 15 | **Total Unit Months** | 109,106 | 97,601 | | 95,572 | |
| 16 | Units eligible for funding for resident participation activities (Line 15C divided by 12) | | | | 7,964 | |
| **Special Provision for Calculation of Utilities Expense Level:** | | | | | | |
| 17 | Unit months for which actual consumption is included on Line 01 of form HUD-52722 and that were removed from Lines 01 through 11, above, because of removal from inventory, including eligibility for the asset repositioning fee | | 0 | | | |

**Section 3**

| Line No. | Description | Requested by PHA | HUD Modifications |
|---|---|---|---|
| **Part A. Formula Expenses** | | | |
| **Project Expense Level (PEL)** | | | |
| 01 | PUM project expense level (PEL) | $363.57 | |
| 02 | Inflation factor | 1.02000 | |
| 03 | PUM inflated PEL (Part A, Line 01 times Line 02) | $370.84 | |
| 04 | PEL (Part A, Line 03 times Section 2, Line 15, Column B) | $36,194,355 | |
| **Utilities Expense Level (UEL)** | | | |
| 05 | PUM utilities expense level (UEL) (from Line 26 of form HUD-52722) | $188.90 | |
| 06 | UEL (Part A, Line 05 times Section 2, Line 15, Column B) | $18,436,829 | |
| **Add-Ons** | | | |
| 07 | Self-sufficiency | $0 | |
| 08 | Energy loan amortization | $0 | |
| 09 | Payment in lieu of taxes (PILOT) | $572,864 | |
| 10 | Cost of independent audit | $106,515 | |
| 11 | Funding for resident participation activities | $199,100 | |
| 12 | Asset management fee ☐ Eligible for an Asset Management Fee | $436,424 | |
| 13 | Information technology fee | $218,212 | |
| 14 | Asset repositioning fee | $822,430 | |
| 15 | Costs attributable to changes in federal law, regulation, or economy | $0 | |
| 16 | **Total Add-Ons** (Sum of Part A, Lines 07 through 15) | **$2,355,545** | |
| 17 | **Total Formula Expenses** (Part A, Line 04 plus Line 06 plus Line 16) | **$56,986,729** | |
| **Part B. Formula Income** | | | |
| 01 | PUM formula income | $166.46 | |
| 02 | PUM change in utility allowances | $0.00 | |
| 03 | PUM adjusted formula income (Sum of Part B, Lines 01 and 02) | $166.46 | |
| 04 | **Total Formula Income** (Part B, Line 03 times Section 2, Line 15, Column B) | **$16,246,662** | |
| **Part C. Other Formula Provisions** | | | |
| 01 | Moving-to-Work (MTW) | $0 | |
| 02 | Transition funding | -$2,944,134 | |
| 03 | Other | $0 | |
| 04 | **Total Other Formula Provisions** (Sum of Part C, Lines 01 through 03) | **-$2,944,134** | |
| **Part D. Calculation of Formula Amount** | | | |
| 01 | Formula calculation (Part A, Line 17 minus Part B, Line 04 plus Part C, Line 04) | $37,795,933 | |
| 02 | Cost of independent audit (Same as Part A, Line 10) | $106,515 | |
| 03 | Formula amount (Greater of Part D, Lines 01 or 02) | $37,795,933 | |
| **Part E. Calculation of Operating Subsidy (HUD Use Only)** | | | |
| 01 | Formula amount (Same as Part D, Line 03) | | |
| 02 | Adjustment due to availability of funds | | |
| 03 | HUD discretionary adjustments | | |
| 04 | **Funds Obligated for Period** (Part E, Line 01 minus Line 02 minus Line 03)<br>Appropriation symbol(s): | | |

Operating Fund Project No.: GA006001070

Section 4

Remarks (provide section, part and line numbers):

Section 5

**Certifications**

☐ In accordance with 24 CFR 990.215, I hereby certify that Housing Authority of the City of Atlanta Georgia is in compliance with the annual income reexamination requirements and that rents and utility allowance calculations have been or will be adjusted in accordance with current HUD requirements and regulations.

☐ In accordance with 24 CFR 990.190(f), I hereby certify that Housing Authority of the City of Atlanta Georgia has fewer than 250 units and has elected to transition to asset management and therefore is eligible to receive an asset management fee.

☐ I 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 PHA Representative & Date: | Singnature of Authorized HUD Representative & Date: |
|---|---|
| President/CEO 9/14/06<br>X | X |

**Annual Statement / Performance and Evaluation Report**
**Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF) Part 1: Summary**

| PHA Name | Grant Type and Number | Federal FY of Grant: 2007 |
|---|---|---|
| The Housing Authority of the City of Atlanta, Georgia | Capital Fund Program Grant No: GA06P006501-07<br>Replacement Housing Factor Grant No: | \ |

[X] Original Annual Statement [ ] Reserve for Disasters/Emergencies [ ] Revised Annual Statement/Revision Number ( __ ___)
[ ] Performance and Evaluation Report for Program Year Ending 06/30/2005 [ ] Final Performance and Evaluation Statement

| Line No. | Summary by Development Account | Total Estimated Cost Original | Total Estimated Cost Revised | Total Actual Cost Obligated | Total Actual Cost Expended |
|---|---|---|---|---|---|
| 1 | Total non-CFP Funds | | | | |
| 2 | 1406 Operations | | | | |
| 3 | 1408 Management Improvements Soft Costs | | | | |
| | Management Improvements Hard Costs | | | | |
| 4 | 1410 Administration | | | | |
| 5 | 1411 Audit | | | | |
| 6 | 1415 Liquidated Damages | | | | |
| 7 | 1430 Fees and Costs | | | | |
| 8 | 1440 Site Acquisition | | | | |
| 9 | 1450 Site Improvement | | | | |
| 10 | 1460 Dwelling Structures | | | | |
| 11 | 1465.1 Dwelling Equipment - Nonexpendable | | | | |
| 12 | 1470 Nondwelling Structure | | | | |
| 13 | 1475 Nondwelling Equipment | | | | |
| 14 | 1485 Demolition | | | | |
| 15 | 1490 Replacement Reserve | | | | |
| 16 | 1492 Moving to Work Demonstration | $13,012,679.00 | $13,012,679.00 | $0.00 | $0.00 |
| 17 | 1495.1 Relocation Costs | | | | |
| 18 | 1499 Development Activities | | | | |
| 19 | 1502 Contingency | | | | |
| 20 | Amount of Annual Grant (Sum of lines 2-19) | **$13,012,679.00** | **$13,012,679.00** | **$0.00** | **$0.00** |
| 21 | Amount of line 20 Related to LBP Activities | | | | |
| 22 | Amount of line 20 Related to Section 504 Compliance | | | | |
| 23 | Amount of line 20 Related to Security - Soft Costs | | | | |
| 24 | Amount of line 20 Related to Security - Hard Costs | | | | |
| 25 | Amount of line 20 Related to Energy Conservation Measures | | | | |
| 26 | Collateratization Expenses or Debt Service | | | | |

**Annual Statement / Performance and Evaluation Report**

**Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF)**

**Part II: Supporting Pages**

| PHA Name: The Housing Authority of the City of Atlanta, Georgia | Grant Type and Nunber<br>Capital Fund Program Grant No: GA06P006501-07<br>Replacement Housing Factor Grant No: | Federal FY of Grant: 2007 |
|---|---|---|

| Development Number/ Name HA-Wide Activities | General Description of Major Work Categories | Dev. Acct No. | Quantity | Total Estimated Cost | | Total Actual Cost | | Status of Work |
|---|---|---|---|---|---|---|---|---|
| | | | | Original | Revised | Funds Obligated | Funds Expended | |
| **GA6-999** | **Authority Wide** | | | | | | | |
| | Undistributed Funds | 1492 | | 13,012,679.00 | | | | |
| **Grand Total** | | | | 13,012,679.00 | | | | |

**Annual Statement / Performance and Evaluation Report**

**Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF)**

**Part III: Implementation Schedule**

| **PHA Name:** The Housing Authority of the City of Atlanta, Georgia | **Grant Type and Nunber** Capital Fund Program Grant No: **GA06P006501-07** Replacement Housing Factor Grant No: | **Federal FY of Grant:** **2007** |
|---|---|---|

| **Development Number/ Name HA-Wide Activities** | **All Funds Obligated (Quarter Ending Date)** | | | **All Funds Expended (Quarter Ending Date)** | | | **Reasons for Revised Target Dates** |
|---|---|---|---|---|---|---|---|
| | Original | Revised | Actual | Original | Revised | Actual | |
| GA6-999 Authority Wide | 9/30/2009 | | | 9/30/2011 | | | |

**Annual Statement / Performance and Evaluation Report**
**Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF) Part 1: Summary**

| PHA Name | Grant Type and Number | Federal FY of Grant: |
|---|---|---|
| The Housing Authority of the City of Atlanta, Georgia | Capital Fund Program Grant No:<br>Replacement Housing Factor Grant No: GA06R006501-07 | 2007 \ |

[X] Original Annual Statement [ ] Reserve for Disasters/Emergencies [ ] Revised Annual Statement/Revision Number ( __ ___)
[ ] Performance and Evaluation Report for Program Year Ending 06/30/2005 [ ] Final Performance and Evaluation Statement

| Line No. | Summary by Development Account | Total Estimated Cost Original | Revised | Total Actual Cost Obligated | Expended |
|---|---|---|---|---|---|
| 1 | Total non-CFP Funds | | | | |
| 2 | 1406 Operations | | | | |
| 3 | 1408 Management Improvements Soft Costs | | | | |
| | Management Improvements Hard Costs | | | | |
| 4 | 1410 Administration | | | | |
| 5 | 1411 Audit | | | | |
| 6 | 1415 Liquidated Damages | | | | |
| 7 | 1430 Fees and Costs | | | | |
| 8 | 1440 Site Acquisition | | | | |
| 9 | 1450 Site Improvement | | | | |
| 10 | 1460 Dwelling Structures | | | | |
| 11 | 1465.1 Dwelling Equipment - Nonexpendable | | | | |
| 12 | 1470 Nondwelling Structure | | | | |
| 13 | 1475 Nondwelling Equipment | | | | |
| 14 | 1485 Demolition | | | | |
| 15 | 1490 Replacement Reserve | | | | |
| 16 | 1492 Moving to Work Demonstration | $1,445,157.00 | $1,445,157.00 | $0.00 | $0.00 |
| 17 | 1495.1 Relocation Costs | | | | |
| 18 | 1499 Development Activities | | | | |
| 19 | 1502 Contingency | | | | |
| 20 | Amount of Annual Grant (Sum of lines 2-19) | **$1,445,157.00** | **$1,445,157.00** | **$0.00** | **$0.00** |
| 21 | Amount of line 20 Related to LBP Activities | | | | |
| 22 | Amount of line 20 Related to Section 504 Compliance | | | | |
| 23 | Amount of line 20 Related to Security - Soft Costs | | | | |
| 24 | Amount of line 20 Related to Security - Hard Costs | | | | |
| 25 | Amount of line 20 Related to Energy Conservation Measures | | | | |
| 26 | Collateratization Expenses or Debt Service | | | | |

**Annual Statement / Performance and Evaluation Report**

**Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF)**

**Part II: Supporting Pages**

| **PHA Name:** The Housing Authority of the City of Atlanta, Georgia | **Grant Type and Nunber** Capital Fund Program Grant No: Replacement Housing Factor Grant No:**GA06R006501-07** | **Federal FY of Grant: 2007** |
|---|---|---|

| Development Number/ Name HA-Wide Activities | General Description of Major Work Categories | Dev. Acct No. | Quantity | Total Estimated Cost | | Total Actual Cost | | Status of Work |
|---|---|---|---|---|---|---|---|---|
| | | | | Original | Revised | Funds Obligated | Funds Expended | |
| **GA6-999** | **Authority Wide** | | | | | | | |
| | Undistributed Funds | 1492 | | 1,445,157.00 | | | | |
| **Grand Total** | | | | 1,445,157.00 | | | | |

**Annual Statement / Performance and Evaluation Report**

**Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF)**

**Part III: Implementation Schedule**

| **PHA Name:** The Housing Authority of the City of Atlanta, Georgia | **Grant Type and Nunber** Capital Fund Program Grant No: Replacement Housing Factor Grant No: **GA06R006501-07** | **Federal FY of Grant:** **2007** |
|---|---|---|

| **Development Number/ Name HA-Wide Activities** | **All Funds Obligated (Quarter Ending Date)** | | | **All Funds Expended (Quarter Ending Date)** | | | **Reasons for Revised Target Dates** |
|---|---|---|---|---|---|---|---|
| | Original | Revised | Actual | Original | Revised | Actual | |
| GA6-999 Authority Wide | TBD | | | TBD | | | |

**Annual Statement / Performance and Evaluation Report**
**Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF) Part 1: Summary**

| PHA Name | Grant Type and Number | Federal FY of Grant: |
|---|---|---|
| The Housing Authority of the City of Atlanta, Georgia | Capital Fund Program Grant No: <br> Replacement Housing Factor Grant No: GA06R006502-07 | 2007 |

[x] Original Annual Statement [ ] Reserve for Disasters/Emergencies [ ] Revised Annual Statement/Revision Number ( __ ___)
[ ] Performance and Evaluation Report for Program Year Ending 06/30/2005 [ ] Final Performance and Evaluation Statement

| Line No. | Summary by Development Account | Total Estimated Cost Original | Revised | Total Actual Cost Obligated | Expended |
|---|---|---|---|---|---|
| 1 | Total non-CFP Funds | | | | |
| 2 | 1406 Operations | | | | |
| 3 | 1408 Management Improvements Soft Costs | | | | |
| | Management Improvements Hard Costs | | | | |
| 4 | 1410 Administration | | | | |
| 5 | 1411 Audit | | | | |
| 6 | 1415 Liquidated Damages | | | | |
| 7 | 1430 Fees and Costs | | | | |
| 8 | 1440 Site Acquisition | | | | |
| 9 | 1450 Site Improvement | | | | |
| 10 | 1460 Dwelling Structures | | | | |
| 11 | 1465.1 Dwelling Equipment - Nonexpendable | | | | |
| 12 | 1470 Nondwelling Structure | | | | |
| 13 | 1475 Nondwelling Equipment | | | | |
| 14 | 1485 Demolition | | | | |
| 15 | 1490 Replacement Reserve | | | | |
| 16 | 1492 Moving to Work Demonstration | $5,477,673.00 | $5,477,673.00 | $0.00 | $0.00 |
| 17 | 1495.1 Relocation Costs | | | | |
| 18 | 1499 Development Activities | | | | |
| 19 | 1502 Contingency | | | | |
| 20 | Amount of Annual Grant (Sum of lines 2-19) | **$5,477,673.00** | **$5,477,673.00** | **$0.00** | **$0.00** |
| 21 | Amount of line 20 Related to LBP Activities | | | | |
| 22 | Amount of line 20 Related to Section 504 Compliance | | | | |
| 23 | Amount of line 20 Related to Security - Soft Costs | | | | |
| 24 | Amount of line 20 Related to Security - Hard Costs | | | | |
| 25 | Amount of line 20 Related to Energy Conservation Measures | | | | |
| 26 | Collateralization Expenses or Debt Service | | | | |

**Annual Statement / Performance and Evaluation Report**

**Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF)**

**Part II: Supporting Pages**

| PHA Name: The Housing Authority of the City of Atlanta, Georgia | Grant Type and Nunber<br>Capital Fund Program Grant No:<br>Replacement Housing Factor Grant No:**GA06R006502-07** | Federal FY of Grant: 2007 |
|---|---|---|

| Development Number/ Name HA-Wide Activities | General Description of Major Work Categories | Dev. Acct No. | Quantity | Total Estimated Cost | | Total Actual Cost | | Status of Work |
|---|---|---|---|---|---|---|---|---|
| | | | | Original | Revised | Funds Obligated | Funds Expended | |
| **GA6-999** | **Authority Wide** | | | | | | | |
| | Undistributed Funds | 1492 | | 5,477,673.00 | | | | |
| **Grand Total** | | | | 5,477,673.00 | | | | |

**Annual Statement / Performance and Evaluation Report**

**Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF)**

**Part III: Implementation Schedule**

| **PHA Name:** The Housing Authority of the City of Atlanta, Georgia | **Grant Type and Nunber** Capital Fund Program Grant No: Replacement Housing Factor Grant No: **GA06R006502-07** | **Federal FY of Grant: 2007** |
|---|---|---|

| **Development Number/ Name HA-Wide Activities** | **All Funds Obligated (Quarter Ending Date)** | | | **All Funds Expended (Quarter Ending Date)** | | | **Reasons for Revised Target Dates** |
|---|---|---|---|---|---|---|---|
| | Original | Revised | Actual | Original | Revised | Actual | |
| GA6-999 Authority Wide | TBD | | | TBD | | | |

## Appendix V: HUD Project Numbers for AHA Properties and Communities

### AHA Owned Communities

| HUD Project Number | High-Rise Communities |
|---|---|
| GA006011 | Antoine Graves |
| GA006054 | Barge Road |
| GA006047 | Cheshire Bridge |
| GA006024 | Cosby Spear Towers |
| GA006030 | East Lake Towers |
| GA006025 | Georgia Avenue |
| GA006026 | Graves Annex |
| GA006053 | Hightower Manor |
| GA006013 | John O. Chiles |
| GA006043 | Juniper & 10th |
| GA006052 | Marian Road |
| GA006058 | Marietta Road |
| GA006016 | M.L. King Tower |
| GA006014 | Palmer House |
| GA006045 | Peachtree Road |
| GA006048 | Piedmont Road |
| GA006027 | Roosevelt House |
| | **Family Communities** |
| GA006028 | Bankhead Courts |
| GA006012 | Bowen Apartments |
| GA006023 | Englewood Manor |
| GA006004 | Grady Homes |
| GA006005R2 | Herndon Homes |
| GA006020 | Hollywood Courts |
| GA006002 | John Hope Model Building |
| GA006032 | Jonesboro North |
| GA006031 | Jonesboro South |
| GA006029 | Leila Valley |
| GA006016 | McDaniel Glenn |
| GA006056 | Martin Street Plaza |
| GA006017 | Thomasville Heights |
| GA006010 | University Apartments |
| GA006024 | U-Rescue Villa |
| GA006044 | Westminster |

### AHA-Sponsored Mixed-Income Communities

| HUD Project Number | Mixed-Income Communities |
|---|---|
| GA006083 | Ashley Courts at Cascade I |
| GA006087 | Ashley Courts at Cascade II |
| GA006090 | Ashley Courts at Cascade III |
| GA006084 | Ashley Terrace at West End |
| GA006097 | Capitol Gateway III |
| GA006099 | Capitol Gateway IV |
| GA006077 | Centennial Place I |
| GA006077A | Centennial Place II |
| GA006077B | Centennial Place III |
| GA006077C | Centennial Place IV |
| GA006093 | College Town at West End |
| GA006100 | Columbia at Mechanicsville Apartments |
| GA006101 | Columbia Senior Residences at Mechanicsville |
| GA006092 | Columbia Commons |
| GA006081 | Columbia Village |
| GA006082 | Magnolia Park I |
| GA006086 | Magnolia Park II |
| GA006070 | Summerdale Commons I |
| GA006079 | Summerdale Commons II |
| GA006061 | The Village at Castleberry Hill I |
| GA006080 | The Village at Castleberry Hill II |
| GA006085 | The Villages at Carver I |
| GA006091 | The Villages at Carver II |
| GA006088 | The Villages at Carver III |
| GA006102 | The Villages at Carver V |
| GA006065 | The Villages of East Lake I |
| GA006078 | The Villages of East Lake II |
| GA006089 | West Highlands at Columbia Estates |
| GA006096 | West Highlands at Columbia Grove |
| GA006094 | West Highlands at Columbia Park Citi |
| GA006095 | West Highlands at Columbia Creste |

### AHA Properties

| HUD Project Number | Property |
|---|---|
| GA006016/ GA006051 | Facilities Maintenance Shop (568 Humphries Street) |
| GA006060/ GA006051 | Facilities Maintenance Shop (749 McDaniel Street and adjacent parcels) |
| GA006016 | Fulton Street/McDaniel Glenn Vacant Property |
| GA006033 | Gilbert Gardens Annex |
| GA006002 | John Hope Model Building |
| GA006002 | North Avenue Warehouse (301 North Avenue) |