



Atlanta Housing Authority

Atlanta Housing Authority

# CATALYST

## Implementation Plan

(Fiscal Year Ending 2009) Board Approved



## Table of Contents

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Message from the President and Chief Executive Officer	Page 1
Message from the Chairman of the AHA Board of Commissioners	Page 2
AHA'S Moving to Work Demonstration	Page 3
Introduction	Page 4
Executive Summary: Overview of AHA's FY 2009 Implementation Plan	Page 10
Part I: Revitalization Program	Page 12
Part II: Quality of Life Initiative	Page 17
Part III: Project Based Rental Assistance as a Development Tool	Page 20
Part IV: Re-Engineering the Housing Choice Voucher Program	Page 22
Part V: Asset Management	Page 26
Part VI: Human Development	Page 31
Part VII: Ongoing Business Operations	Page 36
MTW Implementation Protocols	Page 44
AHA Leadership	Page 45

## Table of Contents – cont.

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### Appendices

Appendix A:	MTW Annual Plan Reference Guide
Appendix B:	AHA's FY 2009 Corporate Roadmap
Appendix C:	AHA Conventional Public Housing Communities
Appendix D:	Mixed-Income Communities
Appendix E:	HUD Project Numbers for AHA Properties and Communities
Appendix F:	Candidate Communities or Properties for Demolition, Disposition, Innovative Subsidy Strategies, Rent Restructuring and/or Other Repositioning Activities
Appendix G:	Candidate Communities for Percentage-Based, Elderly, Disabled, or Non-Elderly Disabled Designations
Appendix H:	Management Information for Owned/Managed Units and Assisted Units at Mixed-Income Communities
Appendix I:	Management Information for Leased Housing
Appendix J:	Quality of Life Initiative Fact Sheet and Relocation Schedule
Appendix K:	Re-Engineering the Housing Choice Program – At A Glance
Appendix L:	Sources and Amounts of Funding/Uses of Funds
Appendix M:	Capital Planning
Appendix N:	Previous Year's Expenditures by Line Item
Appendix O:	MTW Implementation Protocols
Appendix P:	Statement of Corporate Policies

## **Table of Contents – cont.**

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Appendix Q:	Statement of Housing Choice Policies
Appendix R:	Public Review and Plan Changes
Appendix S:	Submissions Required for Receipt of Funds
Appendix T:	Board Resolution
Appendix U:	Certifications



## Message from the President and Chief Executive Officer

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As the Atlanta Housing Authority (AHA) embarks on the sixth year of its seven-year Moving to Work (MTW) demonstration, our work continues to produce milestones of progress that delivers on our mission to provide quality, affordable housing for the betterment of the community.

Betterment in terms of expanding affordable housing inside of mixed income communities within the City of Atlanta to benefit families, seniors, persons with disabilities and special needs populations; betterment in terms of engaging development partners that use private sector principles and know how to create great mixed-use, mixed-income communities; and betterment for our families – as they take personal responsibility and accountability for their successes - and as we endeavor to build on those successes through connection to mainstream resources, counseling and support through our numerous community partners and providers.

The dynamic nature of our national political, economic and public policy environs continues to demand that local housing authorities think “outside of the box” in developing viable, sustainable, service delivery models. For us, MTW has been an undeniable tool facilitating great partnerships, great strategies and great outcomes.

We embark on FY 2009 with great expectation and anticipation. Expectation as to the continued great things we, along with our families and partners, can continue to achieve together, and anticipation of our future under MTW. We will continue to actualize our vision of healthy, mixed-income communities and healthy families.

A handwritten signature in blue ink, appearing to read 'Renée Lewis Glover', written over a white background.

Renée Lewis Glover

President and Chief Executive Officer

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

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The statutory framework for the Moving to Work (MTW) demonstration dictates that the goals for participating agencies include three specific objectives: (1) increase housing choices for low-income families; (2) reduce costs and achieve greater cost effectiveness in federal expenditures; and, (3) promote self-sufficiency for low-income participants.

From the beginning of the Atlanta Housing Authority's MTW demonstration, we have established a business plan and an annual implementation strategy to support these goals. One of our strategic goals is to deconcentrate poverty and integrate families into mainstream America. We are also investing in AHA-assisted families by providing and facilitating professional coaching and counseling, job training and other opportunities so our

families can break the cycle of dependency on federal subsidies. AHA assisted families are entering the workforce in record numbers, and AHA's work with private sector development partners and other private investors has significantly contributed to the resurgence and intown residential growth of the City of Atlanta.

Our FY 2009 CATALYST Implementation Plan continues our approach to -

- **Expand affordable housing choices** in healthy, mixed-income communities through our Revitalization Program, Section 8 Project Based Rental Assistance and tenant-based Housing Choice Priorities, as well as our Quality of Life Initiative;
- **Reduce cost and achieve greater cost effectiveness** through our Asset Management Priority and on-going business operations; and
- **Promote self-sufficiency** for families through our Human Development Priority

Our decade-old objective to transform the delivery of affordable housing remains unchanged; however, since the beginning of our MTW demonstration back in 2003, we have been able to progress and succeed in a way not possible without our current MTW status. MTW is our window of opportunity – the opportunity to continue making a difference in the lives of others and the opportunity to realize, achieve and succeed!

A handwritten signature in black ink, appearing to read 'Cecil Phillips'.

Cecil Phillips,  
Chairman  
AHA Board of Commissioners

## AHA'S MOVING TO WORK DEMONSTRATION

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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. The MTW Demonstration Program provides AHA with the opportunity to fulfill its vision to facilitate better housing opportunities, better outcomes for AHA's families and greater operational efficiencies which are all consistent with the MTW Statutory goals. The MTW Statutory goals are (1) Reduce cost and achieve greater cost effectiveness in Federal expenditures; (2) Give incentives to families with children whose heads of households 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 (3) Increase housing choices for low-income families. AHA accomplishes its vision through partnerships with private sector developers, using private sector models and market principles, and with its MTW Agreement flexibility, AHA has the ability to address local issues with local solutions. AHA's MTW demonstration period began on July 1, 2003, and will last seven years through June 30, 2010, unless otherwise extended.

AHA, in consultation with AHA's Board of Commissioners, residents, resident advisory boards, local public officials, investors, private developers, foundations, service providers and other stakeholders prepared the agency's Business Plan to be implemented during the seven year period of the MTW Agreement. The Business Plan outlines the major activities that AHA is undertaking that is consistent with its MTW flexibility to transform the manner of providing the affordable housing resource in the City of Atlanta. AHA calls its Business Plan "CATALYST". In June 2004, AHA submitted to HUD its Business Plan and this comprehensive document constituted AHA's Base Plan. Subsequently, AHA's Business Plan is amended annually and from time to time by way of CATALYST Implementation Plans, of which this document represents.

A comprehensive planning process which considers the affordable housing needs of the local jurisdiction; policies of AHA's Board of Commissioners; AHA's resources (financial and other), ongoing plans and priorities and resident and public input and consultation determines activities to be undertaken during the fiscal year. AHA submits the Annual CATALYST Implementation Plans to HUD who reviews for consistency with AHA's MTW Agreement. Additionally, as part of that review process, AHA and HUD determine if MTW Implementation Protocols are needed. These protocols represent a number of high-level procedures or conventions in carrying out AHA's CATALYST Implementation Plan activities in alignment with AHA's MTW Agreement with HUD. Through these implementing documents, AHA has been able to further attract and engage the private sector development community; expand the availability of affordable housing opportunities in desirable neighborhoods; and is supporting efforts to connect families to long-term, sustainable housing options in the City of Atlanta.

For the purpose 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.

## INTRODUCTION

Intrinsic to the Atlanta Housing Authority's (AHA) work is a vision, mission, guiding principals, goals and corporate structure that serve as the framework for the agency's strategic direction. Since 1994, AHA determined that the sociology of warehousing poor families in isolated barrack-style buildings has perpetuated the cycle of poverty and that the costs to families, the City of Atlanta, and society as a whole has been detrimental. AHA believes that the better solution is to provide affordable housing seamlessly in market competitive, mixed-income communities while connecting families to community-based resources and amenities that promote family success and an improved quality of life.

### Vision

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Healthy mixed-income communities.

### Mission

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

### Guiding Principles

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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 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

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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

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AHA has four established business lines that serve as the core organizational structure for implementing the agency's business plan activities and achieving its corporate benchmarks and objectives. These business lines are: **Real Estate Management, Housing Choice Administration, Real Estate Development and Acquisitions and Asset Management.** The following pages contain descriptions of these business lines including their overall purpose and strategic direction.

AHA is also 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** and are included under Part VII – Ongoing Business Operations.

## 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). These companies are responsible for the day-to-day management functions including rent collections, property planning and maintenance, resident services, site security, performance reporting, and capital improvements at the properties (See **Appendix C** for a list of these properties). The PMCOs also facilitate linkages for AHA-assisted families to community-based resources, services and support.

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. Since 2001, all of the AHA-owned public housing properties (including family and elderly communities) are managed by the PMCOs. The management companies are able to apply market discipline and expertise and manage the properties more strategically and efficiently.

### **Strategic Direction.**

One of AHA's priorities during FY 2009 is to continue relocating families from 12 obsolete public housing communities including two senior high-rises and 10 family communities. AHA calls this the Quality of Life Initiative (QLI). AHA has already relocated families from five communities (Leila Valley, Jonesboro North and South, U-Rescue Villa and Englewood Manor), and will commence relocation of the seven remaining in FY 2009. 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.

Once QLI is complete, AHA will continue to own, operate, and sustain 11 high-rise communities and two family communities in its public housing portfolio. AHA will strategically invest its capital resources in the 11 remaining high-rise communities to improve the quality of life for residents and to ensure the long-term viability of the property. Given that these properties are also obsolete and not market competitive for housing seniors and disabled persons, AHA will continue to explore ways to better position these communities to their highest and best use. AHA will continue to work with the PMCOs to operate the remaining high-rise and family properties in a way that achieves AHA's MTW Agreement benchmarks for rent collection levels, occupancy rates, emergency and routine work orders, and inspections. **Appendix H** of this CATALYST Implementation Plan provides more detail on AHA's performance against these benchmarks for its housing portfolio for the period ending June 30, 2007 and for the projections for the upcoming FY 2009.

## HOUSING CHOICE ADMINISTRATION

AHA's Housing Choice Administration business line is responsible for managing the Housing Choice voucher program. 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. The administrative responsibilities include the day-to-day operations of tenant-based vouchers, and special program vouchers including Mainstream (for persons with disabilities) 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 and inspection compliance, processing of annual re-certifications, managing the waiting list, and enforcement of AHA CATALYST work requirements and voucher regulatory compliance with Housing Choice participants.

**Strategic Direction.** AHA has and will continue to use its MTW flexibility to re-engineer the Housing Choice program to ensure it is managed more effectively to achieve greater efficiency, effectiveness, and sustainability from a number of perspectives, including fiscal, landlord, participant and foundational (See **Appendix K**). This includes modifying payment standards to promote deconcentration of poverty by aligning fair market rents with City of Atlanta sub-markets. 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. Additionally, AHA will increase its efforts to attract, maintain and manage its landlord network in an effort to (1) improve landlords acceptance of the vouchers; (2) create a partnering spirit between AHA and private-market landlords; and (3) increase housing choices in quality, mixed-income environments.

## 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 revitalization and development 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 as it relates to redevelopment activities; 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 utilizing Section 8 Project Based Rental Assistance (PBRA).

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 promote revitalized neighborhoods served by high-performing schools and family-oriented recreation, services and amenities.

**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 Rental Assistance 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
- 🌀 Redeveloping or repositioning obsolete public housing communities
- 🌀 Acquiring properties for rehabilitation or development
- 🌀 Acquiring land for future development



## ASSET MANAGEMENT

The Asset Management business line provides strategic oversight and financial management of AHA's assets, real estate investments, and facilitates and manages certain strategic and external business relationships on an organizational basis. Asset Management is also an overarching organizational endeavor that involves cross-departmental coordination and cooperation that supports and drives AHA's repositioning, revitalization and investment strategies. 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. 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. 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 Asset Management business line includes Asset Management and Account Services, Management and Occupancy Compliance and Policy Development and Corporate Planning. Responsibilities include the management of AHA's business relationships with private development partners and the oversight of related assets to include the oversight of the Project Based Rental Assistance Site Based Administration; compliance monitoring activities, fee-based contract administration; policy development and advisement; evaluation in coordination with local universities and the MTW Benchmarking Study.

**Strategic Direction.** 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. During FY 2009, the work under this business line will place an emphasis on relationship management and technology oriented solutions. This work will help to further develop a corporate framework for the coordination of activities related to Asset Management and to continue designing and implementing tactical administrative processes and automated data management systems to ensure a seamless approach throughout the organization and with AHA's external business relationships. In addition, AHA will work to expand and enhance its relationship with private developers through the execution of Project Based Rental Assistance Agreements to increase housing opportunities to low-income families in quality, mixed-income living environments.

## EXECUTIVE SUMMARY:

### OVERVIEW OF FY 2009 IMPLEMENTATION PLAN

AHA's FY 2009 CATALYST Implementation Plan (the "FY 2009 MTW Annual Plan") establishes AHA's priorities and activities under the Business Plan for FY 2009, which is the sixth year of AHA's seven-year Moving to Work (MTW) Agreement. The FY 2009 Implementation Plan identifies activities that AHA will undertake during FY 2009 which is for the period July 1, 2008 – June 30, 2009.

Since adopting its Business Plan, 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 B** for a copy of AHA's FY 2009 Corporate Roadmap.) The Corporate Roadmap summarizes AHA's Business Plan along its vision, mission, guiding principles, corporate goals and business lines, all of which were described earlier.

In this Plan, AHA's Business Plan projects and activities are aligned around six major priorities. These priorities are described in more detail in Parts I – VI of this Plan, but are highlighted below:

1. **Revitalization Program** – AHA will continue its strategic revitalization program. 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.
2. **Quality of Life Initiative** – AHA will relocate families from 12 of its obsolete remaining public housing communities including two senior high-rises and 10 family communities. Impacted families will also receive coaching and counseling services for a 27-month period with goals (a) successful resettlement in privately owned housing; (b) achieving economic independence; and (c) achieving family success. Combined, these communities house more than 3,000 families that AHA will be relocating to better communities and better neighborhoods over a three-year period. 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.
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; and (c) facilitate the development of supportive services housing for persons with disabilities 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, implementing technology solutions, improving customer service delivery, human resources development, and refining participant and landlord policies and procedures.
5. **Asset Management** – AHA will continue to develop and evolve the systems, processes, procedures and human resources to create comprehensive and integrated asset management capacity, with an emphasis on external business relationship management and 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 persons with disabilities.

In addition to the six major priorities, the FY 2009 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.

## **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 healthy economically independent families, healthy educated children, and healthy self-sufficient elderly and disabled persons - in partnership with excellent human development firms, social service agencies and educational institutions. This section of the Plan relates to the real estate development component, while Part VI of the Plan addresses the human development component.

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.

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 2009. A list of such properties can be found in **Appendix F**, which includes targeted communities under the Quality of Life Initiative (see Part II of this Plan for an explanation of QLI). 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, mixed-use housing opportunities, support local revitalization initiatives and stabilize local neighborhoods.



## Supporting Activities

**Revitalization Activities.** During FY 2009, AHA and its private sector development partners will continue the development of its award winning Signature properties that provide market quality housing opportunities in healthy, mixed-income communities for families of all income levels. The following describes the six major revitalization projects that are underway or in predevelopment:

1. **Capitol Homes.** During FY 2009, Capitol Gateway (the revitalized Capitol Homes) will continue to include the development of off-site single family for-sale homes and property acquired as part of the revitalization plan since during FY 2008 the final on-site rental phase was completed.
2. **Carver Homes.** The Villages at Carver (the revitalized Carver Homes) will continue to include the development of on- and off-site retail, on-site single family for-sale homes, and property acquired as part of the revitalization plan. During FY 2008, the final on-site rental phase was completed. All HOPE VI funds for this project will be expended in FY 2009.
3. **Perry Homes.** West Highlands at Heman E. Perry Boulevard (the revitalized Perry Homes) will continue to include development of on- and off-site single family for-sale homes and property acquired for development as part of the revitalization plan. All rental production requirements are completed; all HOPE VI funds have been expended; and the HOPE VI grant will be closed-out once the obligation to construct the remaining 43 single family homes is complete – anticipated to occur in FY 2009.
4. **Grady Homes (including Antoine Graves, Graves Annex and University Homes).** Auburn Pointe (the revitalized Grady Homes) will include the demolition of the senior buildings (Antoine Graves and Graves Annex) which is anticipated to begin in FY 2009, development of on-site rental housing, off-site single family for-sale homes and property acquired as part of the revitalization plan. A tax credit award has been received for the second phase of construction on mixed income multifamily rental units and the financial closing is anticipated for summer 2008 (i.e. early part of FY 2009), with construction completion slated for December 2009. In June 2008, AHA's development partner will submit tax credit applications for two phases of senior housing, which will provide 200 mixed-income senior units (160 Project Based Rental Assistance and 40 market rate), with construction planned for spring/summer 2009.

University Homes is the off-site component of the Grady Homes revitalization, with demolition of the existing public housing structures anticipated in FY 2009. Master planning efforts will continue through FY 2009.

5. **Harris Homes (including John O. Chiles and John O. Chiles Annex).** Collegetown at West End (the revitalized Harris Homes) will continue to include the development of on-site rental housing, off-site single family for-sale homes, and property acquired for development as part of the revitalization plan. AHA and its development partners received a tax credit award for John O. Chiles high-rise, which is under construction, with completion expected by December 2009. Additionally, a tax credit award was received for the John O. Chiles Annex and the financial closing is expected to occur in April 2008 with construction completion in January 2009. A tax credit award was also received for the final phase of multifamily rental construction at Collegetown and the financial closing is anticipated in July 2008 with construction completion in December 2009.
6. **McDaniel Glenn (including the revitalization of the McDaniel Glenn Annexes and Martin Luther King, Jr. Senior High-rise).** The revitalization will continue to include the development of on-site rental housing and property acquired as part of the revitalization plan. The final two multifamily phases are under construction with completion anticipated in December 2008.

**Comprehensive Homeownership Program.** During FY 2009, AHA will continue the implementation of its Comprehensive Homeownership Program which prepares low to moderate income families in becoming successful homeowners and develops affordable homeownership opportunities in healthy, mixed-income communities.

An objective of the Homeownership Program is to provide a subordinate loan to low and moderate income first-time home buyers to reduce the principal amount of the first mortgage and thus, reduce their monthly housing costs so they can qualify for a private mortgage. This loan is generally used to assist the homeowner in bridging the difference between the affordable sales price for the proposed home and the sum of the first mortgage lien amount. Repayment of the loan subsidy is triggered when the home is sold, transferred or refinanced during the first 15 years of the loan.

Eligible participants must undergo a rigorous review that is designed to evaluate a participant's preparedness in successfully purchasing and owning a home. The initial screening for the Comprehensive Homeownership program requires that qualified applicants meet the following criteria:

- Household income must be at or below 80 - 115% of Metropolitan Area Median Income, depending on the HOPE VI grant being utilized
- Applicants must not have owned a home within the last 18 months<sup>1</sup>
- Applicants must attend homebuyer's education classes
- The applicant should provide minimum down payment of 3% with no less than \$1,000 from buyers own funds
- Be able to verify a minimum of two (2) months PITI (principal, interest, taxes and insurance) cash reserves after closing
- Debt-to-income ratio should not exceed 46%
- Loan-to-Value ratio should not exceed 100%
- The applicant must occupy the home as their primary residence

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<sup>1</sup> AHA's definition for "first-time" homebuyers

Homebuyer readiness is gauged using an evaluation process that serves as a barometer against the lender's requirements. AHA has an internal Loan Review Committee that examines the proposed buyer's information and makes recommendations on approval (or denial) of subsidy assistance.

Given the adverse market conditions that are being experienced in the Atlanta market consistent with national trends, on-site for-sale homeownership development will proceed cautiously, as supported by market studies and the private sector financial investment necessary for long-term sustainability. AHA will also explore creating a demonstration program to facilitate the stabilization of neighborhoods severely impacted by escalating foreclosures which have resulted in excessive vacant homes. AHA's homeownership plans for FY 2009 are described in more detail below:

- 1. Capitol Homes.** The Capitol Homes HOPE VI revitalization plan for off-site for-sale single family homes includes a partnership between AHA's development partner (Capitol Gateway, LLC), and various for-profit and not-for-profit developers to provide new construction of the for-sale homes. These include 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, Lakewood Hills, LLC, SUMMECH CDC, Autaco Development LLC, University CDC, and JLW Homes and Communities. AHA provides up to \$20,000 of HOPE VI funds as down payment assistance to qualified buyers for the 81 off-site affordable for sale units to allow for greater affordability. During FY 2008, 28 affordable and 50 market rate homes were constructed and sold as part of the program. During FY 2009, these home builders will continue to work with the developer and AHA to ensure Capitol Homes' off-site HOPE VI homeownership plans are met (81 affordable, 50 market). Due to adverse conditions in the Atlanta housing market as noted above, AHA and its development partner have determined to delay construction of the on-site homeownership units (370 for-sale homes of which 60 are affordable and 310 market including 131 condos/townhomes developed as part of the HUD further leverage phase).
- 2. Carver Homes.** 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 251 for-sale units. Of the 251 units, 67 will be affordable to families at or below 115% of AMI. The development partner selected a third party home builder to construct these homes. There will be no HOPE VI funds used for homeownership subsidy; however, AHA may provide assistance on an as-needed basis from program income funds to allow for greater affordability. Construction will begin in summer 2008 on the condominiums (stacked flats) and townhomes, with first units available for sale in early 2009.
- 3. Perry Homes.** The Perry Homes HOPE VI revitalization plan includes 100 on-site and off-site, for-sale single family homes (40 affordable, 60 market). AHA is providing down payment assistance for the 40 affordable for-sale units in this initial phase of development. In FY 2007, 57 units (26 affordable, 31 market) were completed

and sold; and in FY 2009, the final 43 homes are scheduled to be completed and sold (14 affordable, 29 market). As part of the HUD further leverage phase and depending on market conditions, future development will include 258 on-site for-sale single family homes and approximately 239 off-site for sale single family homes. Twenty percent of these future phases will be targeted as affordable to individuals at or below 80% of AMI.

4. **Grady Homes.** 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 21 newly constructed for-sale affordable units. During FY 2008, AHA conveyed lots to Habitat and Habitat developed 17 for-sale single family homes, all affordable to families at 50% of AMI. In FY 2009, AHA will convey two lots in the revitalized neighborhood of Grant Park to Habitat and Habitat will construct three affordable single family homes, also affordable to families at 50% of AMI. Due to adverse conditions in the Atlanta housing market as noted earlier, AHA and its development partner have determined to delay construction of the on-site homeownership units (14 affordable, 35 market rate) as part of the Grady footprint, as well as any homeownership opportunities associated with University Homes.
5. **Harris Homes.** Depending on overall market conditions, in FY 2009 Harris Redevelopment LLC anticipates partnering with various for-profit and not-for-profit developers to provide new construction of 50 affordable off-site for-sale homes. AHA may provide up to \$22,500 of HOPE VI funds as down payment assistance to qualified buyers to allow for greater affordability. Due to adverse conditions in the Atlanta housing market as noted previously, AHA and its development partner have determined to delay construction of the on-site homeownership units (339 for-sale homes of which 25 are affordable and 44 market rate as part of the HUD revitalization plan with an additional 270 for-sale homes of which 24 are affordable and 246 are market rate as part of the HUD further leverage phase).
6. **McDaniel Glenn.** Due to adverse conditions in the Atlanta housing market as previously noted, AHA and its development partner have determined to delay construction of the on-site homeownership units (297 for-sale homes of which 67 are affordable and 230 market rate) as part of the HUD revitalization plan. For the long-term sustainability of the overall development, AHA and its development partner continue to explore opportunities with various for-profit and not-for-profit developers to provide new construction / rehabilitation of the for-sale homes, having sponsored the development of 6 homes in the neighborhood. AHA may provide assistance on an as-needed basis from program income funds to allow for greater affordability.

Additionally, during FY 2009, AHA will continue to manage the transition of the Homeownership Self-Sufficiency (HSS) Program previously managed by Housing Choice. The HSS program provides monthly mortgage assistance to assist first-time home buyers with the payment of total housing costs: principal, interest, taxes, insurance and utilities. The management of this program along with the eligibility criteria and requirements for program participants will continue to be refined to complement existing standards established under the Comprehensive Homeownership Program.



## PART II: QUALITY OF LIFE INITIATIVE

Initiated in FY 2007, AHA's Quality of Life Initiative (QLI) empowers families in 12 of AHA's remaining obsolete and distressed public housing communities to relocate from environments of concentrated poverty (See the QLI fact sheet and Relocation Schedule under **Appendix J**). QLI is consistent with AHA's vision of providing eligible families with access to affordable housing while deconcentrating poverty and building healthy communities.

Since beginning Phase I of QLI in July 2007, all residents have been relocated off-site from five communities: Englewood Manor, Jonesboro North, Jonesboro South, Leila Valley and U-Rescue Villa. Demolition applications for these five communities have been submitted and received approval from HUD. During FY 2009, AHA will begin the implementation of Phase II of QLI which includes the relocation of over 2,200 families from Bankhead Courts, Bowen Homes, Herndon Homes, Hollywood Court, Palmer House, Roosevelt House, and Thomasville Heights. Additionally, demolition applications for the Phase II communities were submitted to HUD in February 2008 (Herndon, Palmer, Roosevelt and Thomasville) and March 2008 (Bankhead, Bowen and Hollywood), and AHA is awaiting HUD's review and response.

As of December 31 2007, there were 2,274 households at the seven remaining QLI Properties including 498 households at the two senior high-rise developments - Palmer House and Roosevelt House, and 1,776 households at the five remaining targeted family properties. Of the 4,298 residents at the five family communities, 2,306 (54%) are children under the age of 17. The elementary schools serving the five family communities rank among the bottom 150 of 1,176 elementary schools in the state of Georgia according to the Georgia Public Policy Foundation Report Card for Parents, 2007 Spring Edition in terms of academic performance.

In order to ensure the success of relocating families, AHA will continue to provide intensive human development and support services to support the families both pre- and post-relocation. AHA believes that the continuation of these services will assist families as they make the move into their new neighborhoods. The following describes a number of these services that support QLI to help families achieve a successful transition.

### Supporting Activities

**Responsible Relocation.** 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. The Relocation Team will manage the relocation of families with thoughtful consideration of the impact on Atlanta's neighborhoods.

**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 2009, and will be further enhanced by including a mobility counseling component to ensure that residents are educated on searching for quality housing opportunities that offer amenities, high performing schools, and other resources that improve their quality of life.

**Human Development and Support Services.** During FY 2009, AHA will continue 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 beginning prior to the start of relocation.

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

**Enhanced Housing Marketing.** Atlanta has experienced a soft rental market for the past several years. According to REIS Rental Market Data, there were approximately 3,574 property vacancies in the Atlanta/Fulton submarket, and over 28,767 vacancies in the metro Atlanta area as of mid-year 2007, with vacancy rates at 9.6% for Class B/C properties and 7.2% for Class A properties. According to Databank (a one-stop commercial and real estate building locator), an additional 14,152 units are in the pipeline, and approximately 7,400 vacant/unsold condo units are available according to Haddow & Company, an Atlanta-based real estate consulting firm. The soft market has provided voucher holders with increased opportunity to secure good quality housing that accepts the voucher. During FY 2009, AHA will continue to target these opportunities by partnering with property owners and real estate agents to open up the doors for relocating families. A few key strategies that AHA will implement include but are not limited to (1) developing strategic partnerships with real estate agents, real estate investors, and multifamily apartment owners to engage them in assisting residents to find quality housing units; (2) aggressively soliciting property owners / landlords in low poverty areas in making quality units available to residents; and, (3) conducting housing tours and fairs.

**Leasing Incentive Fees.** Using its MTW flexibility, AHA established Leasing Incentive Fees (LIF) during FY 2008 as a deconcentration strategy and a means to encourage landlords and property owners in the private market to lease available housing to AHA-assisted families impacted by relocation. The LIF is a one-time, non-refundable fee payable to property owners providing housing to relocating families. The LIF is paid directly by AHA to the landlord and is payable to any housing provider participating in AHA's Housing Choice Voucher Program both for tenant based and project based rental assisted housing. AHA will continue the implementation of this initiative during FY 2009. AHA will also explore establishing incentive fees that reward real estate agents who assist relocating residents in the successful leasing of quality housing units.

**Pre-Relocation Client Education.** Beginning in FY 2008 and into FY 2009, AHA will provide a variety of educational seminars to families in advance of relocation efforts to include training on the Housing Choice Voucher Program, tips and tools on ensuring a successful move, adjusting to a new environment and utility seminars to educate families on conservation and managing their budgets. AHA will continue to work with its Human Services Management partners and local utility companies in the identification of discounts and special programs that reduce the amount of the utility deposit paid by the residents. Family Support Specialists will continue to assist residents in finding resources to clear any unpaid utility balances and to get utilities established in their names.

**Customer and Community Relations.** AHA's 24-hour customer/community relations hotline (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. During FY 2009, AHA will hire an additional investigator to follow-up on complaints received regarding Housing Choice participants.

## **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 or PBRA) 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; (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. During FY 2009, AHA will be continuing the following activities as part of the implementation of this major priority.

### **Supporting Activities**

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**Developing Alternative & Supportive Housing Resources.** During FY 2009, AHA will continue developing and implementing initiatives toward the development of alternative and supportive housing resources for income eligible families.

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 high-rise allowed AHA 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 could leverage the public housing development funds with private resources. The John O. Chiles high-rise is being comprehensively renovated to become competitive as mixed-income Elderly Housing in today's market place. AHA and its development partner applied for and received approval from HUD to have the public housing assisted units in the high-rise 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 applied for and received approval from HUD to have the public housing assisted units at John O. Chiles Annex designated permanently as Disabled Only supportive services housing.

For both John O. Chiles high-rise and John O. Chiles Annex, AHA and its development partners received tax credit awards. Construction has commenced and will continue into FY 2009 on the rehabilitation of the John O. Chiles high-rise, which will provide 190 mixed-income senior units (76 public housing, 76 PBRA and 38 market rate). In April 2008, AHA and its



development partners will close on the rehabilitation of John O. Chiles Annex and construction will be completed by January 2009 providing 26 public housing units for persons with mental and developmental disabilities.

**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 continue discussions with various PHAs or local governments in the Atlanta metropolitan area to negotiate Intergovernmental Agreements, subject to the provisions of State law, to permit site-based administration of AHA's PBRA Program in those jurisdictions. Proposals will continue to be solicited for new construction and/or properties placed in service within the past five years.

**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 PBRA targeted to the chronically homeless population. Under the program, AHA will allocate 500 vouchers over a five-year period towards the implementation of this program. AHA already has 389 PBRA units committed, under construction or executed with private owners under this demonstration. During FY 2009, AHA will continue to solicit proposals for project based assistance from housing providers who have partnered with United Way service providers or who will fund the requisite services.

**Project Based Rental Assistance Mental Health Demonstration.** Implementation of the Mental Health Demonstration is underway. AHA already has 93 PBRA units committed, under construction or executed under this demonstration. During FY 2009, proposals will be solicited from private developers for existing rehabilitations, and/or new construction of housing with supportive services for persons with mental health disabilities.

**Project Based Rental Assistance inside of Mixed Income Communities.** As part of AHA's ongoing effort to expand the availability of quality affordable housing in the City of Atlanta, AHA will continue to work with private developers and owners through a competitive process in order to secure PBRA commitments for a reasonable percentage of units in mixed-income communities. To date, AHA has procured approximately 2,900 multi-family units (over 1,100 units for families and over 1,800 independent living units for seniors), which are either under commitment, under a PBRA agreement, or in the construction phase. This activity will continue during FY 2009 in support of AHA's Quality of Life Initiative.

**Affordable Assisted Living Demonstration.** During FY 2008, AHA began exploring strategies for developing affordable assisted living opportunities for low-income seniors and persons with disabilities. These strategies included examining ways to leverage resources with Medicaid Waivers or other service funding 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. Due to the enormous complexity of Georgia's Medicaid system and the extensive financial and human resources (internal and external) that would be required to move this endeavor forward, this activity will be postponed during FY 2009.

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

As part of its operational re-engineering, Housing Choice (HC) will realign its core functional work activity in three (3) primary service areas: (1) Participant Services, (2) Landlord Services, and (3) Program Support (See **Appendix K** for Housing Choice Operations at a Glance). By utilizing this approach in FY 2009, HC will foster a more customer-centric focus in the service delivery units and improve cross functional collaboration both within Housing Choice, and with other AHA departments. Just as AHA has changed the paradigm for mixed-income / market rate communities, the HC program must also undergo a transition to private sector principles and the operational discipline that is necessary to enhance the long-term sustainability of the program. To this end, AHA will implement the following projects as aligned to the three service areas.

### **Supporting Activities**

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#### **Housing Choice Supporting Projects – Participant Services**

In FY 2009, HC will work towards a decisive shift to a customer-focused tenant voucher program by streamlining and enhancing its service delivery to applicants and participants. The participant services group will administer the full life cycle of functions from waitlist administration and processing, to intake and eligibility screening, voucher generation and briefing, management of program moves, portability transactions, annual recertification, and participant hearings and terminations. Concurrent to the execution of routine operational activity to participants, Housing Choice will undertake the following projects:

**Intake/Waitlist Re-engineering.** Housing Choice recently undertook the review and purging of the waitlist to create a “ready state” pool of about 6,000 applicants that have confirmed their interest in remaining on the waitlist and meeting CATALYST eligibility requirements should the waitlist open. Additionally, this “ready state” waitlist data is being fully automated in AHA’s Next Generation information system, which will facilitate easy access to applicant information at the primary customer touch points, including AHA’s contact center operators and the HC customer service desk.

**Program Moves.** In recent years, the destabilizing influence of the excessive number of participant moves occurring with less than one year of tenancy led AHA to initiate a minimum two-year tenancy requirement in FY 2007 and 2008. This strategy has been successful at reducing the volume of program moves by 50%, however, during FY 2009, AHA will continue to view multi-year tenancy as a goal, but not as a defined family requirement. AHA will do a total file review and engage in detailed discussions with the family about their individual circumstances and family needs as an approach to enhance family stability and success.

**Automated Outbound Portability Billing.** Beginning in Spring 2008, AHA began discussions with six (6) metro

Atlanta public housing authorities that receive 95% of AHA outbound ports to create a more streamlined system for administrative processing of these inter-agency transactions. During FY 2009, AHA will continue working with these agencies to develop a business process change to significantly reduce non-value added paperwork and eliminate the need for recurring reconciliation of participant data between the two agencies. Under this model, AHA will focus on their role as an asset manager of voucher funds and continue to leave participant interface and case management duties to the receiving agency.

**Annual Re-certification Re-engineering.** As part of AHA's customer focused changes in FY 2009, participants will be interviewed 120 days prior to their lease expiration date rather than 60 - 90 days as in FY 2008. This will allow more preparatory time for families to gather the necessary documentation for recertification, including the CATALYST work / program compliance requirement. The goal is to make the recertification meeting a more meaningful, pleasant and efficient experience for the client and reduce the need for subsequent calls/trips to complete assembly of all paperwork.

In early 2008, AHA modified its recertification time cycle for senior citizens on a fixed income from an annual basis to once every two years. This enhancement will continue in FY 2009 along with initiation of a "by mail" recertification process for HC participants with disabilities or seniors with limited ability to come to the AHA corporate office. Additionally, during FY 2009, AHA will limit interim recertification activity only to households where an income change has created a negative financial burden for the family.

**Enhanced Business Systems (Family Obligations Document Enforcement, Enhanced Criminal Screening, and Health and Safety Standards.)** AHA will continue to enhance the business processes associated with enforcing CATALYST policies and family obligations. Activities include:

- Streamlining the work program compliance review process and engaging a vendor to expedite the criminal background screening process.
- Coordinating between Housing Choice and Resident Services to ensure that the needs of participants with disabilities or disabled family members are being met with reasonable accommodations for their circumstances.
- Utilizing processes to expedite responses to support participants under events of emergency or personal safety, such as for natural disasters or Violence Against Women Act (VAWA) issues.

**Automated Hearing Database.** To improve efficiency, timeliness and objectivity in the participant hearing process, AHA developed a tracking system in its Oracle database. This system has improved the scheduling, processing and disposition of "hearings" significantly reducing the time required. AHA incorporated the use of this system in its routine operations in FY 2008 and will continue to utilize the system during FY 2009.

## **Housing Choice Supporting Projects – Landlord Services**

In support of AHA's agency wide implementation of the Quality of Life Initiative, Housing Choice is expanding the scope and breadth of its landlord services function. AHA intends to move to a private sector business model to enhance relations with prospective and current owners/landlords who interface with the tenant voucher program. The landlord services group will be responsible for the complete life cycle of services, beginning with landlord marketing and outreach and continuing with landlord relations and training, landlord applications, requests for tenancy approval processing, QLI / relocation interface, rent determinations and adjustments, HAP contract development and administration, and landlord terminations. Concurrent to the execution of operational activity to owner / landlords, HC will undertake the following projects:

**Place-based and People-based Deconcentration Strategy including Fair Market Rent Standards & Rent Reasonableness System.** Ending the practice of concentrating low income individuals in distressed and isolated neighborhoods is a guiding principle for AHA. Given the growth in volume of HC tenant voucher participants, during FY 2009 AHA will employ a number of strategies to create and expand the network of quality housing options.

Utilizing a third-party Real Estate Market Research firm in FY 2008, a rent payment standard schedule was developed, dividing the City of Atlanta into seven (7) unique sub-markets based on market-rate rent standards. AHA believes that this new payment standard will encourage participation from owners/landlords in non-traditional areas and will provide greater opportunities for families to locate in low-poverty neighborhoods.

With respect to HC Rent Reasonableness System Standards, AHA's approach begins with the established payment standard schedule. Once a request for tenancy is submitted to AHA by the resident, a reasonable rent is computed based on a minimum of three (3) comparable units of the same type with an equal number of bedrooms, similar square footage, age, utilities and amenities. These comparables are also cross-checked against AHA's payment standards to ensure that the agreed upon contract rent is reasonable and competitive with current market rents.

Concurrently, AHA is also proactively marketing to rental housing industry groups, multifamily apartment owners, property management firms and independent property owners to expand AHA's housing resources network. HC is also developing strategies to nurture and enhance landlord relationships over time. During FY 2009, key supporting components will include landlord training and communication, additional resources and information on the landlord portal, and the hosting of landlord town hall sessions to serve as a feedback loop from external partners to HC management. AHA will continue to perform due diligence credit history reviews on landlords in an effort to minimize the potential of foreclosures and bankruptcies that would adversely impact families. In FY 2009, AHA may elect to add criminal history screening to AHA's landlord due diligence process.

**Enhanced Real Estate Inspection Systems.** Key components of AHA's Enhanced Real Estate Inspection systems for FY 2009 include: inspections for single family, duplex, triplex and quadraplex units that include pre-contract assessments; initial inspections for property inclusion in the HC program; annual property and unit

inspections; special inspections as initiated by participant, landlord or neighbors related to health and safety issues; and Quality Control inspections used to re-inspect properties that have passed or failed previous inspections.

### **Housing Choice Supporting Projects – Program Support**

The transformation of the HC business model is incomplete without the creation of supporting and enabling infrastructure that can serve as a foundation for AHA's Housing Choice operations. The FY 2009 priority projects are described below.

**UHAP Bankcards.** AHA will continue to implement the Utility Housing Assistance Payment (UHAP) bank card business system that began in FY 2008. This approach utilizes a prepaid card for the payment of monthly HC participant utility expenses. Participants utilize this card to set up automatic bill payments to their utility companies or payment of bills by phone, internet, or in person.

**File Purge and E-copy.** AHA has made significant progress in the last two years in transitioning to an all electronic participant and landlord document management and file system. For participants, critical documents on family composition and status are now maintained electronically. AHA will continue with its electronic conversion of paper files/documents with the goal of being a paperless operation by the close of FY 2010. This conversion will enhance real time access to client information at HC customer touch points throughout the agency and will facilitate the ability of AHA's contact center staff to confirm receipt of documents and better respond to customer calls and inquiries. In addition, during FY 2009, HC will undertake the development of a comprehensive contract administration and document management system aligned to AHA best practice standards.

**Program Performance Indicators.** AHA plans to develop a broader group of financial and operational performance reports to facilitate improved fact-based decision making by the HC management team. Key operational reports (monthly/quarterly) will cover MTW benchmark performance, contract and document administration, HC technology enhancements, progress monitoring, compliance activity, applicant and participant demographics, waitlist status, eligibility processing, voucher issuance, RTA processing, program moves, site inspections, annual and interim recertification, and landlords' outreach, application and contract status.

**Customer Service Call Center.** AHA will continue to operate a centralized call center which will serve as a dynamic link with the Authority's external constituents and provide a unified approach to handling customer calls throughout the agency. Current goals target answering 95 percent of calls within three minutes, while providing friendly service and accurate information.

**Homeownership Standards.** The homeownership program previously managed by Housing Choice has moved under the umbrella of the Comprehensive Homeownership Program previously discussed under the Revitalization Priority activity. During FY 2009, AHA will continue to manage the transition of the Homeownership Self-Sufficiency (HSS) Program and review and refine criteria and requirements to complement existing standards established .

## 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 2009, 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

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**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 communities and the assisted residents or applicants. These policies and procedures would include, but not be limited to, application and waiting list procedures, eligibility and/or suitability criteria, program/training participation requirements and term limits. During FY 2009, AHA will continue to 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.

**Project Based Rental Assistance Site Based Administration.** AHA has 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 PBRA for a percentage of the units. During FY 2008, PBRA transitioned under the Asset Management business line and a number of operational and procedural changes were made to include PBRA Agreements replacing existing Housing Assistance Payment (HAP) contracts and the use of a PBRA payment application to invoice for monthly PBRA payments. AHA has begun development of an enhanced technology solution which will enable such owners to upload directly to the AHA system. During FY 2009 AHA will fully implement the new system and continue to implement further operational changes to this program.

**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 F** of this plan, and as further updated by this plan, are candidates for disposition under this strategy. (Please refer to **Appendix D** 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. AHA, has also drafted a MTW Implementation Protocol for this strategy that is submitted with this Plan for HUD’s review and approval. This protocol is titled – *Disposition of Public Housing Operating Subsidy in AHA-Sponsored Mixed-Finance Communities* and can be found in **Appendix O**. This protocol incorporates HUD’s policy statement on this strategy that was included in an August 20, 2007 response letter of HUD’s conditional/partial approval of AHA’s FY 2008 CATALYST Implementation Plan. During FY 2009, AHA will continue to explore applicability of this strategy at any of the candidate communities outlined in Appendix F.

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.

**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. During FY 2009 AHA will also continue to explore applicability of this strategy at candidate communities outlined in **Appendix F**. AHA, has drafted a MTW Implementation Protocol for this strategy that will be included under submission of this Plan for HUD's further review and approval. This protocol is titled – *Disposition of Public Housing Operating Subsidy in AHA-Owned Affordable Communities* and can be found in **Appendix O**. It should be noted that although this strategy focuses primarily on high-rise communities, there are two family communities (Westminster and Martin Street Plaza) that are also candidate communities for innovative subsidy strategies and are included in the aforementioned protocol.

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 PBRA. 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.

**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. The primary goal is to adopt an approach that will reduce duplication of effort, and eliminate obsolete systems at AHA's Signature and PBRA properties. During FY 2009, AHA will research various regulatory requirements and develop protocols for streamlining property-level operations that will enhance operating efficiency at the site level.

**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 in the City of Atlanta and Fulton County. During FY 2009, AHA will continue to serve as a subcontractor to GA HAP conducting management and occupancy reviews of approximately 60 properties.

**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 (PAE), 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. Based on the evaluation, AHA prepares a pro forma financial analysis and makes a recommendation to HUD's Office of Affordable Housing Preservation. AHA has been assigned 24 restructurings to date.

Congress extended the Mark to Market Program through FFY 2011, and AHA will continue in its role as a PAE during this period.

**Oversight of Turnkey III Assets.** As FY 2008 draws to a close, AHA is finalizing the close-out of the Turnkey III Homebuyers Program according to the HUD-approved plan. During FY 2009, 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) the contingency reserves established for each community; and (iii) the Turnkey III debt forgiveness funds set aside to 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 (includes families living in AHA's Affordable Communities as well as Housing Choice participants) 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 persons with disabilities.

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 residents still residing in its conventional public housing communities. Concentrated poverty, furthered by the on-site delivery of social services, has disconnected families from mainstream society. In addition, many of these residents are at a desperate financial disadvantage, subsisting on an average annual household income of just over \$9,629, well below the national poverty level. Further, at December 2007, of the 6,408 residents living in the family communities, 3,971 (62%) are children under the age of 17. With this dynamic in play, the propensity for this bleak cycle to impact children is ominous.

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.

## Supporting Activities

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**Rapid Response Assistance Team.** During FY 2008, AHA established a Rapid Response Assistance Team to expeditiously respond to participants affected by foreclosures by providing relocation assistance and other support to impacted families. This team also proactively identifies housing in pre-foreclosure status and works to rectify with the property owner and provides assistance to affected families. Additionally, this response team provides assistance to families impacted by other emergency situations to include displacement due to natural disasters or health and safety issues. AHA will continue this assistance to families during FY 2009.

**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. During FY 2009, AHA will continue to use its in-house social workers to provide specialized counseling to families who are non-compliant with AHA's work requirement in an effort to assist these residents in becoming compliant. 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).

**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 2009, 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 continue to recruit quality service providers from predominant areas where AHA-assisted families reside. AHA will also continue the development of the following strategic partnerships: (1) implementation of the Good to Great GED program provided through a partnership with Atlanta Metropolitan College and Atlanta Public Schools; (2) implementation of a GED voucher program where AHA pays for residents/participants' first GED assessment offered provided through the Atlanta-Fulton Public Library and Atlanta Public Schools; (3) provision of mental health training by Jewish Family and Career Services to AHA staff, private management companies, and human development and support services providers, through AHA's Mental Health Task Force, in identifying mental health issues and making appropriate referrals; and (4) placement of residents/participants in long-term and contract-to-hire job opportunities through the Manpower Corporation.



**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.

**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, mental health services, and senior supportive services.

**Housing Choice Family Self-Sufficiency (FSS) Program Re-engineering.** During FY 2009, AHA will continue its new simplified FSS Program designed to provide a flat escrow available only towards the purchase of a home. This program is also transitioning as an opportunity under the agency’s Comprehensive Homeownership Program.

**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 2009, 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). During FY 2009, 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.

**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. During FY 2009, AHA will continue to offer scholarship opportunities to eligible AHA residents and will seek to raise more private funding to support the program.

**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.

**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.

**Place-Based Supportive Services Strategy Pilot.** AHA in collaboration with a number of partners will continue the implementation of a place-based pilot referred to as the NORC (Naturally Occurring Retirement Community) at Marian Road, Piedmont Road, and Cheshire Bridge Road high-rises. The 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 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). During FY 2009, AHA in partnership with the Atlanta Regional Commission (ARC) will continue the NORC at

Marian Road High-Rise, Cheshire Bridge Road, and Piedmont Road senior high-rises utilizing a \$375,000 ROSS (Resident Opportunities and Self-Sufficiency) grant secured during FY 2007.

**Individual Development Accounts (IDAs).** In exploring this initiative, AHA planned to eliminate the existing earned income disregard and replace it with Individual Development Accounts (IDAs) program for public housing assisted residents who are 18 to 61 years of age and who meet certain requirements. However, because of the on-going QLI related activities, AHA has postponed the development and implementation of this program during FY 2009.

## **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**

AHA is a diversified real estate company with a public mission and purpose. It's MTW designation and related 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 FY 1996 and as of FY 2002, began preparing property-based financial statements.

#### **Asset Management Under the New Operating Subsidy Rule**

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.

**Project-based Accounting and Financial Systems/Quarterly Financial Statements by Business Line.** Over the last few years, 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 were 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 continue to evolve and will allow AHA to produce quarterly financial statements and detailed analysis reports across the entire organization for all program operations.

**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 2009.

**Utility Allowance Waiver.** Based on the existing condition of the AHA real estate portfolio including aging building infrastructures, minimum insulation and poor air circulation, in FY 2008, AHA adjusted the utility allowance waiver for all elderly and disabled families to include an allowance for air-conditioning during the cooling months. During FY 2009, AHA will assess the effects of this adjustment and consider alternative methods for encouraging energy efficient living while reducing the burden of utility expenses on residents living at properties with obsolete systems and infrastructure. Future changes to the utility allowances could 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.

**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. During the last half of FY 2008, AHA will have a third party contractor conduct an energy audit of AHA's long-term hold properties in order to identify potential energy cost saving measures that AHA will then consider implementing in FY 2009 or future years.

**Procurement Enhancements.** During FY 2008, AHA completely reorganized its procurement functions to expand the breadth of its acquisition activities, streamline operations, increase efficiency and enhance quality control. AHA underwent a detailed third-party independent assessment of current division structure and other resources to ensure that staff and resource capabilities are consistent with the enhanced *customer centric* focus of AHA's anticipated procurement / acquisition activities. In FY 2009, AHA will institute its Total Acquisition Management ("TAM") initiative designed to offer its Business Units "cradle to grave" singular point-of-contact services and technical assistance for acquisitions and related

services. AHA will fully utilize the flexibility allowed for the procurement of goods and services below the small purchase threshold and embrace greater use of technology and the world-wide-web to identify vendors and procure goods and services. Some of this flexibility includes the continued administration of its micro-purchasing level at \$5,000 and utilization of contracts with terms in excess of five years (but generally no more than 10 years) for certain strategic services contracts. In addition, AHA will also refine, formalize, and fully utilize its Competitive Exceptions List of transactions of goods and services that are impractical or impossible to competitively bid because of market or other conditions and further its revitalization efforts by entering into sole source contracts with non-profit, community-based and/or other service providers to provide self-sufficiency and other services to residents of AHA's communities undergoing revitalization.

AHA will identify and begin the initial implementation of commercially available or custom designed procurement and contract administration software designed to standardize processes and documentation. AHA will also begin planning and developing its multi-year E-procurement initiative that will utilize electronic and digital technology to coordinate and deliver acquisition services, labor and other compliance reporting/tracking, vendor identification and retention, in real time, with enhanced degrees of accountability, responsiveness and timeliness.

**Financial Operations.** During FY 2009, 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, Replacement Housing Factor Funds, 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 2009 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. Calendar Year 2008 marks the first year for individual property operating subsidy calculations. Due to HUD delays in the implementation of related software, AHA has not yet submitted the calculation of its Low Income Operating Subsidy for Calendar Year 2008, but expects to do so by April 15, 2008. HUD will use these calculations as the basis for funding January through December 2008, which includes the first six months of AHA's Fiscal Year 2009. After receipt of calculations from all public housing authorities, HUD will establish a proration factor which will establish actual funding for each property HUD initially estimated that this information would be available in May 2008, but will likely be later.

The second half of AHA's FY 2009 runs from January 1, 2009 through June 30, 2009. Calculation of this subsidy is not



expected to be submitted to HUD until September 2008 and will be based on property occupancy for AHA's FY 2008, adjusted for properties coming off-line. Properties that are being demolished or sold (disposed) to other entities cease to receive full operating subsidy, but receive repositioning fees from HUD for two to three years after relocation begins. Therefore, the pace of AHA's QLI program will lower the amount of FY 2009 Low Income funding from an estimated \$31 million in FY 2008 to \$29 million in FY 2009.

Due to the great uncertainty surrounding the Low Income Program in both 2008 and 2009, AHA cannot create a firm projection of FY 2009 Low Income Funding, but is using \$29 million as a working estimate based on the information currently available.

**Housing Choice Voucher Related MTW Income.** HUD has not yet announced AHA's funding level for Calendar Year 2008 which includes the first half of AHA's FY 2009. Based on currently available information, however, AHA estimates that it will receive \$185 million in Housing Choice Voucher Related income in the MTW Block Grant in FY 2009. This funding was calculated using the methodology outlined in Appendix A of AHA's MTW Agreement. This was based on continued base funding at December 2007 levels and includes funding for new tenant protection vouchers related to AHA's QLI program.

**Capital Funding Program Related MTW Income.** Based on current funding methodology, AHA estimates that it will receive a \$12.0 million grant award from the Capital Funding Program (CFP) in the HUD's Federal Fiscal Year 2008 MTW Block Grant. The Consolidated Budget is included in **Appendix L** and the Capital Planning Budget is included in **Appendix M**.

**Replacement Housing Factor Funds.** In FY 2009, AHA will use Replacement Housing Factor (RHF) grants from 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 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 and is incorporated in the Revision of MTW Benchmark Protocol. AHA made this clarification in light of changes that HUD has made in funding vouchers based on a calendar year versus a fiscal year.

**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 P**). AHA will continue to enhance its accessibility efforts in FY 2009, 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) refining and implementing new procedures that will improve AHA's ability to effectively address the needs of applicants and residents with disabilities; 4) continued enhancement of a proactive strategy to enhance effective communication with the families we serve; 5) implementation of additional strategies for enhanced resident/participant awareness of their disability-related rights; 6) continuation of training for employees of AHA and its private management partners regarding disability-related concerns and 7) exploring and implementing methods by which persons with mobility impairments may learn of opportunities for apartment units that are more accessible to them. 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.

### **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 four 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, and the fourth on April 30, 2008.

The Statement of Corporate Policies is updated to clarify established policies and revise existing language, as appropriate, to ensure consistency in rent and occupancy policies governing the public housing and housing choice voucher programs. (A copy of the Statement of Corporate Policies is included in **Appendix P**).

***Statement of Policies Governing the Housing Choice Tenant-Based Program<sup>2</sup> (Statement of Housing Choice Policies)*** The Board of Commissioners adopted the Administrative Plan on August 25, 2004, and approved six 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, the fifth on April 25, 2007. The sixth was adopted under the new document title: Statement of Policies Governing the Housing Choice Tenant-Based Program, on April 30, 2008. The name change was made in order to clarify that this is a policy document and not a procedural manual.

The Statement of Housing Choice Policies was updated to clarify established policies and revise existing language, as appropriate, to ensure consistency in rent and occupancy policies governing the public housing and housing choice voucher programs. The Statement of Housing Choice Policies will also include policy language with respect to Reasonable Accommodations which afford persons with disabilities full participation in the Housing Choice Voucher program, and related AHA activities and added language as it relates to the development of special programs. (A copy of the revised Statement of Housing Choice Policies is included in **Appendix Q**).

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<sup>2</sup> Formerly known as Administrative Plan Governing the Housing Choice Voucher Program

**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. During FY 2009, AHA will continue to adhere to the procedures that AHA developed in FY 2007 and implemented in FY 2008.

**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 persons with disabilities. 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. During FY 2009, AHA will continue to implement the 4:1 elderly/almost elderly admissions policy at its high-rise communities that was initiated on March 1, 2006. 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.

**Permanent Designated Housing.** AHA will continue to explore pursuing designations for communities listed in **Appendix G** 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 CATALYST Implementation Plan. AHA will comply with the MTW Implementation Protocol related to Designated Housing as outlined in **Appendix O** of this annual plan.

**Affordable Fixed Rent Demonstration.** During FY 2007 and FY 2008, AHA explored the concept of implementing an Affordable Fixed Rent Demonstration which would establish a flat rent that all families in the targeted community would be subject to paying. However, during FY 2009, AHA will postpone the Fixed Rent Demonstration and will explore using other innovative subsidy strategies as outlined under the Asset Management Priority activity.

**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 2009, AHA will work from AHA's PMCO Occupancy Guidebook with the goal of improving site-based operational quality and consistency particularly in the areas of intake and re-certification. This Guidebook was developed and implemented in FY 2008. AHA will also 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.

**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 2009.

**\$125 Minimum Rent.** Effective October 1, 2004, AHA raised its minimum rent from \$25 to \$125 under its Public Housing and Housing Choice programs. 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 2009, and will continue to implement the \$125 minimum rent as part of PMCOs routine operations.

**Enhanced Relocation Procedures and Database Enhancements<sup>3</sup>.** During FY 2009, AHA will continue to refine its relocation procedures and Consolidated Relocation Management System (CRMS) in order to enhance operational efficiency, customer service, resident tracking, and reporting, and to ensure compliance with applicable HUD regulations.

**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 the communities several times a year with a focus on each of the priority inspection areas at least once per year.

**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.

**Video Call Down Systems.** To date, AHA has installed eight 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. AHA is working closely with the Atlanta Police Department, the PMCOs and the contracted security companies to increase the effectiveness of the video monitoring and the roving security patrols

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<sup>3</sup> Combines the former **Relocation Policies** and **Enhanced Relocation Process and Database Enhancements**

at all the communities and until such time that QLI impacted communities has relocated all the residents. The video call down systems facilitate the community security effort during the relocation of the residents. Four of the eight properties with video call down systems will be vacant by the end of FY 2008 and three others will undergo relocation during FY 2009. The cameras and recording equipment will be removed from the properties prior to the demolition of the property. The equipment from vacant properties is being redistributed based on other needs throughout the AHA portfolio.

**Organizational Initiatives.** To further enhance its human resources so that AHA can continue to achieve its Business Plan activities, the following organizational initiatives will continue to be implemented in FY 2009:

- Corporate Culture Project – AHA will be conducting a culture audit of its leadership to help in refining the agency's core value system. Through this process, the intent will be to build a more adaptive and resilient organizational value system through its leadership that focuses on enhancing professionalism, integrity, accountability and collaborative teamwork.
- Human Resources Development – AHA will continue to build upon and enhance the organizational human resource capital necessary for the successful implementation of AHA's Business Plan.

## MTW 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. AHA and HUD have negotiated a number of implementation protocols based on the goals, objectives and activities set forth in AHA's Business Plan and subsequent CATALYST Implementation Plans. AHA and HUD agreed that in order to facilitate innovation, such implementation protocols are needed and as they are established they 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 and 2008 Implementation Plans. **Appendix O** of this Plan contains HUD approved implementation protocols, protocols undergoing HUD's review and new implementation protocols that will be included under this Plan submission. Moving forward, implementation protocols that have been adopted will be included in the appendices of AHA's MTW Annual Plans.



## AHA Leadership

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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.

Glover has received numerous recognitions over the years which include being honored with the Turner Broadcasting Downtown Community Service Award in March 2007 and in July 2003 Glover was chosen by the Atlanta History Center as one of Atlanta's Defining Women, a group of 50 modern day women that have made significant contributions to the city of Atlanta. In June 2002, a collaboration among the Center for American Women and Politics, the Ford Foundation, and the Council for Excellence in Government recognized Glover as one of the top ten American women in government, and Glover was named Public Official of the Year in the 2002 *Governing* Magazine. 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.

Glover is currently serving as a member on the International Board of Directors of Habitat for Humanity, is a member of the Board of the Council of Large Public Housing Authorities having served as president of the Board from 2000 to 2004, and is an inducted member of the National Association of Public Administrators. Glover also previously served on the National Advisory Council of Fannie Mae.

Including Ms. Glover, AHA's executive management team consists of seven senior executives and a private sector program manager 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.

## AHA Leadership – cont.

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### **Renee Lewis Glover, President and Chief Executive Officer**

*Renée Lewis Glover* joined the Atlanta Housing Authority (AHA) as CEO in September 1994. Glover has been nationally recognized for her role in transforming U.S. urban policy. At AHA, Glover pioneered master-planned, mixed finance, mixed-income residential development, and reorganized AHA to become a diversified real estate company, with a public policy and service-oriented mission. Her efforts have rebuilt entire communities from the ground up, and in creating a replicable model for redevelopment, Glover has helped cities across the country transform their urban landscapes. Prior to joining AHA, Glover was a corporate finance attorney in Atlanta and New York City. She received her Juris Doctorate from Boston University, her Master's degree from Yale University and her Bachelor of Arts from Fisk University.



### **Nick Farsi, Chief Information Officer (Technology & Operations)**

*Nick Farsi* is a senior Information Technology executive with over 20 years of diversified experience in Retail, Telecomm, E-Commerce, Real Estate and Web Hosting. As Chief Information Officer for AHA, Mr. Farsi is leading initiatives that create Information Technology strategy enabling the agency's operational efficiencies and transforms how AHA does business in the 21<sup>st</sup> century.



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

*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.

## AHA Leadership – cont.

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**Gloria Green, General Counsel & Chief Legal Officer (Office of the General Counsel)**

*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 executive management team, Ms. Green manages the Legal Department which provides legal services to support the implementation of the agency's CATALYST Plan.



**Pat Jones, Program Manager (Operations)**

*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 30 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.



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

*Steve Nolan* has over 15 years of accounting and auditing experience in the HUD regulated environment which 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.

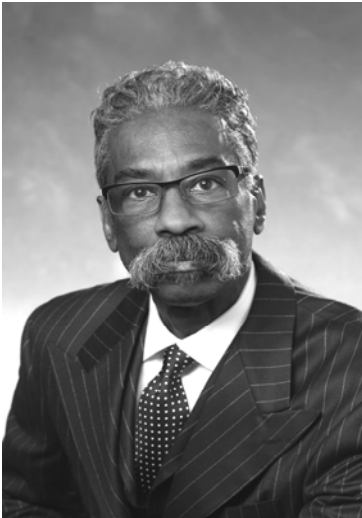
## AHA Leadership

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**E. Mike Proctor, Ph.D., Chief Operating Officer (Asset Management and Policy Development)**

*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)**

*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, has been paramount in the agency's work of changing lives and in unleashing the human potential. With more than 20 years of progressive leadership as a decisive decision maker and an advocate for senior and children issues, Mr. Simms provides the guidance for implementing strategies that have been successful in transitioning families from dependency to economic independence.





Atlanta Housing Authority

Atlanta Housing Authority

# CATALYST

## Implementation Plan Appendices

(Fiscal Year Ending 2009) Board Approved



# Table of Contents

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## Appendices

Appendix A:	MTW Annual Plan Reference Guide
Appendix B:	AHA's FY 2009 Corporate Roadmap
Appendix C:	AHA Conventional Public Housing Communities
Appendix D:	Mixed-Income Communities
Appendix E:	HUD Project Numbers for AHA Properties and Communities
Appendix F:	Candidate Communities or Properties for Demolition, Disposition, Innovative Subsidy Strategies, Rent Restructuring and/or Other Repositioning Activities
Appendix G:	Candidate Communities for Percentage-Based, Elderly, Disabled, or Non-Elderly Disabled Designations
Appendix H:	Management Information for Owned/Managed Units and Assisted Units at Mixed-Income Communities
Appendix I:	Management Information for Leased Housing
Appendix J:	Quality of Life Initiative Fact Sheet and Relocation Schedule
Appendix K:	Re-Engineering the Housing Choice Program – At A Glance
Appendix L:	Sources and Amounts of Funding/Uses of Funds
Appendix M:	Capital Planning
Appendix N:	Previous Year's Expenditures by Line Item
Appendix O:	MTW Implementation Protocols
Appendix P:	Statement of Corporate Policies



## Table of Contents – cont.

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Appendix Q:	Statement of Housing Choice Policies
Appendix R:	Public Review and Plan Changes
Appendix S:	Submissions Required for Receipt of Funds
Appendix T:	Board Resolution <ul style="list-style-type: none"><li>- Resolution</li><li>- Secretary's Certificate</li><li>- FY 2009 Activities Directory</li></ul>
Appendix U:	Certifications <ul style="list-style-type: none"><li>- Certification for FY 2009 MTW Annual Plan</li><li>- Disclosure of Lobbying Activities</li><li>- Certification for a Drug Free Workplace</li></ul>

## Appendix A: MTW ANNUAL PLAN CROSS REFERENCE GUIDE

ANNUAL PLAN	REQUIREMENT	LOCATION
<b>I. HOUSEHOLDS SERVED</b>		
	A. Number and characteristics of households served at beginning of period, by: <ul style="list-style-type: none"> <li>- unit size</li> <li>- family type (family vs. elderly or disabled)</li> <li>- income group (&lt;30: 30-50; 50-80;&gt;80)</li> <li>- housing type (LRPH; leased, other)</li> <li>- race &amp; ethnicity</li> </ul>	N/A for FY 2009 <sup>1</sup>
	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.
<b>II. OCCUPANCY POLICIES</b>		
	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 P & Q
	B. Statement of Rent Policy	Appendices P & Q
<b>III. CHANGES IN THE HOUSING STOCK</b>		
	A. Number of units in inventory at beginning of period by program (LRPH, leased, other)	No longer required. <sup>2</sup>
	B. Projected number at end of period by program	Same as above.

<sup>1</sup> 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 EuQuant (formerly 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. The FY 2008 Interim Report will be included in AHA's FY 2008 MTW Annual Report.

<sup>2</sup> 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
<b>IV. SOURCES AND AMOUNTS OF FUNDING</b>		
	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.
<b>V. USES OF FUNDS</b>		
	A. Previous year expenditures by line item	Appendix N
	B. Planned expenditures by line item	Appendix L
	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.
<b>VI. CAPITAL PLANNING</b>		
	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 F Part I of Plan, Page 12 Part II of Plan, Page 17 Part V of Plan, Pages 26-29
	D. Homeownership activities, if any	Part I of Plan, Pages 14-16
<b>VII. MANAGEMENT INFORMATION FOR OWNED/MANAGED UNITS</b>		
	<b>A. VACANCY (OCCUPANCY) RATES</b>	
	1. Occupancy rates by property beginning of period	Appendix H
	2. Narrative: issues and proposed action	Same as above.
	3. Target rates by property at end of period	Same as above.
<b>B. RENT COLLECTIONS</b>		
	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.

ANNUAL PLAN	REQUIREMENT	LOCATION
<b>C. WORK ORDERS</b>		
	1. Response rates beginning of period <ul style="list-style-type: none"> <li>• % emergency within 24 hrs</li> <li>• % regular within 30 days</li> </ul>	Appendix H
	2. Narrative: issues and proposed actions	Same as above.
	3. Target rates at end of period	Same as above.
<b>D. INSPECTIONS</b>		
	1. Description of inspection strategy	Appendix H
	2. Planned inspections (% this FY)	Same as above.
<b>E. SECURITY</b>		
	1. Narrative: security issues and proposed Actions	Appendix H
<b>VIII. MANAGEMENT INFORMATION FOR LEASED HOUSING</b>		
<b>A. LEASING INFORMATION</b>		
	1. Units under lease (%) beginning of period	No longer required. <sup>3</sup>
	2. Target lease up rate at end of period	Same as above.
	3. Plans regarding: Ensuring rent reasonableness Expanding housing opportunities Deconcentration of low-income families	Appendices I, P & Q Part II of Plan, pg. 17 Part IV of Plan, pg. 24
	4. Issues and proposed actions	No longer required. <sup>3</sup>
<b>B. INSPECTION STRATEGY</b>		
	1. Description of inspection strategy, including: a) Planned inspections completed (% this FY) by category: <ul style="list-style-type: none"> <li>• Annual HQS inspections</li> <li>• Pre-contract HQS inspections</li> <li>• HQS Quality Control Inspections</li> </ul>	Appendix H & I

<sup>3</sup> 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
	b) HQS Enforcement	
<b>IX. RESIDENT PROGRAMS</b>		
	1. Description of activities	Parts VI of Plan
	2. Issues and proposed actions	Parts VI of Plan
<b>X. OTHER INFORMATION AS REQUIRED BY HUD</b>		
	A. Board Resolution Adopting Plan Certifying that Public Hearing Requirements were met	Appendix T
	B. Required Certifications and other submissions from which the Agency is not exempted by the MTW Agreement	Appendix U
	C. Submissions required for the receipt of funds	Appendix S

#### 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.”

#### “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.

# Atlanta Housing Authority FY 2009 Corporate Roadmap

## 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

## 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	Simms
▪ 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	Nolan



FY 2009  
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 Innovations
- Streamlining Property-Level Operations
- Sustaining Mixed-Income Investments
- Project Based Rental Assistance Site Based Administration

#### Re-Engineering Housing Choice Operations

##### Participant Services

- Intake/Waitlist Re-engineering
- Program Moves
- Annual Re-certification Re-engineering
- Enhanced Business Systems
- Automated Hearing Database

##### Program Support

- UHAP Bankcards
- File Purge and E-copy
- Program Performance Indicators
- Customer Service Call Center

##### Landlord Services

- Place-based and People-based Deconcentration Strategy including Fair Market Rent Standards and Rent Reasonableness System
- Enhanced Real Estate Inspection Systems

### Quality Living Environments

#### Revitalization Program

- Revitalization Activities
- Comprehensive Homeownership Program

#### Project Based Vouchers as a Development Tool

- 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 inside of Mixed Income Communities

#### Quality of Life Initiative

- Customer and Community Relations
- Good Neighbor Program II
- Human Development and Support Services
- Responsible Relocation
- Enhanced Housing Marketing
- Leasing Incentive Fees
- Pre-Relocation Client Education

### Self-Sufficiency

#### Human Development

- Rapid Response Assistance Team
- Atlanta Community Scholars Awards
- CATALYST Resource Guide
- Connections to the Service Provider Network
- Customer and Community Relations
- Good Neighbor Program II
- Human Development and Support Services
- Place Based Supportive Services Strategy Plot
- School Attendance Requirement
- 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
- Violence Against Women Act

- \$125 Minimum Rent
- 4 to 1 elderly Admissions Preference
- Corporate Policies Governing eligibility, Occupancy, and Program Administration
- Elderly Income Disregard
- Enhanced Accessibility Initiative
- Enhanced Business Systems
- Permanent Designated Housing
- Video call Down Systems
- Enhanced Relocation Procedures and Database Enhancements
- Organizational Initiatives



## Appendix C: AHA Conventional Public Housing Communities

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

\*These communities are already in an active redevelopment process to include one or more of the following: master planning, resident relocation, demolition, disposition, construction, and lease-up.

\*\*A high-rise community

## **Appendix D: Mixed-Income Communities \***

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

\*Mixed-use, Mixed-income communities under various stages of development.

## Appendix E: HUD Project Numbers for AHA Properties and Communities

### AHA Owned Communities

HUD Project Number	Elderly/Disabled 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 (includes John O. Chiles Annex)
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
GA006005R2	Herndon Homes
GA006020	Hollywood Courts
GA006032	Jonesboro North
GA006031	Jonesboro South
GA006029	Leila Valley
GA006056	Martin Street Plaza
GA006017	Thomasville Heights
GA006010	University Apartments
GA006024	U-Rescue Villa
GA006044	Westminster

**AHA-Sponsored Mixed-Income Communities**

<b>HUD Project Number</b>	<b>Mixed-Income Communities</b>
GA006093	Ashley Collegetown
GA006083	Ashley Courts at Cascade I
GA006087	Ashley Courts at Cascade II
GA006090	Ashley Courts at Cascade III
GA006084	Ashley Terrace at West End
GA06P00604	Auburn Pointe
GA006097	Capitol Gateway III
GA006099	Capitol Gateway IV
GA006077A	Centennial Place I
GA006077B	Centennial Place II
GA006077C	Centennial Place III
GA006077D	Centennial Place IV
GA006100	Columbia at Mechanicsville Apartments
GA006101	Columbia Senior Residences at Mechanicsville
GA06URD006I103	Mechanicsville
GA006092	Columbia Commons
GA006081	Columbia Village
GA006082	Magnolia Park I
GA006086	Magnolia Park II
GA006080	The Village at Castleberry Hill I
GA006061	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	Columbia Estates at West Highlands
GA006096	Columbia Grove at West Highlands
GA006094	Columbia Park Citi at West Highlands
GA006095	Columbia Creste at West Highlands
GA006070	Summerdale Commons I
GA006079	Summerdale Commons II

## Appendix E: HUD Project Numbers for AHA Properties and Communities (Continued)

### 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)

## Appendix F: 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 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 Collegetown  
Ashley Courts at Cascade I  
Ashley Courts at Cascade II  
Ashley Courts at Cascade III  
Ashley Terrace at West End  
Auburn Pointe  
Capitol Gateway  
Centennial Place I  
Centennial Place II  
Centennial Place III  
Centennial Place IV  
Columbia at Mechanicsville Apartments  
Columbia Senior Residences at Mechanicsville  
Columbia Commons  
Columbia Village  
Magnolia Park I  
Magnolia Park II  
The Village at Castleberry Hill I  
The Village at Castleberry Hill II  
The Villages at Carver I  
The Villages at Carver II  
The Villages at Carver III  
The Villages of East Lake I  
The Villages of East Lake II  
Columbia Estates at West Highlands  
Columbia Grove at West Highlands  
Columbia Park Citi at West Highlands  
Columbia Creste at West Highlands  
Summerdale Commons I  
Summerdale Commons II

\*These properties are subject to disposition scenarios as detailed in Sustaining Mixed-Income Investments under Part V of the FY 2009 Implementation Plan.

\*\*Affects ACC units only.

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

### Property

Facilities Maintenance Shop (749 McDaniel Street and adjacent parcels)\*\*

Harland Discovery Teen Center (423 Peeples Street, S.W., Atlanta, Georgia 30310)

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.

\*\* Represents properties that have received demolition approval from HUD

## Harris Homes Revitalization

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:

Parcel I.D.	Property Address
14-0117-0003-013	333 Ashby Street
14-0117-0003-010	926 Westview Drive
14-0117-0003-009	930 Westview Drive
14-0117-0003-008	Westview Drive
14-0117-0003-007	938 Westview Drive
14-0117-0003-064	940-42 Westview Dr.
14-0117-0003-004	944-46 Westview Dr.
14-0117-0003-003	948 Westview Drive
14-0117-0003-002	952 Westview Drive
14-0117-0003-055	316 Abbott Street
14-0117-0003-017	320 Abbott Street
14-0117-0002-024	311 Abbott Street
14-0117-0002-023	307 Abbott Street
14-0117-0002-022	303 Abbott Street
14-0117-0002-021	299 Abbott Street
14-0117-0002-101	978 Westview Drive
14-0117-0002-099	984 Westview Drive
14-0117-0002-100	990 Westview Drive
14-0117-0002-019	994 Westview Drive
14-0117-0002-018	998 Westview Drive
14-0117-0002-017	Westview Drive
14-0117-0002-029	Baldwin Place
14-0117-0002-028	304 Baldwin Place
14-0117-0002-027	1007 Baldwin Street
14-0117-0002-026	1003 Baldwin Street
14-0117-0002-025	993 Baldwin Street
14-0117-0002-035	315 Baldwin Place
14-0117-0002-034	Vacant Lot
14-0117-0002-033	309 Baldwin Place
14-0117-0002-032	303 Baldwin Street
14-0117-0002-031	297 Baldwin Street
14-0117-0002-030	291 Baldwin Street
14-0117-0002-015	1012 Westview Drive

## Harris Homes Revitalization– cont.

Parcel I.D.	Property Address
14-0117-0002-014	Westview Drive
14-0117-0002-013	1018 Westview Drive
14-0117-0002-012	1020 Westview Drive
14-0117-0002-011	1022 Westview Drive
14-0117-0002-010	1026 Westview Drive
14-0117-0002-009	1030 Westview Drive
14-0117-0002-008	1032 Westview Drive
14-0117-0002-007	1036 Westview Drive
14-0117-0002-006	1040 Westview Drive
14-0117-0002-005	1044 Westview Drive
14-0117-0002-004	1052-54 Westview Dr.
14-0117-0002-003	Westview Drive
14-0117-0002-002	1056 Westview Dr.
14-0117-0002-001	1060 Westview Drive
14-0117-0002-095	1059 Baldwin Street
14-0117-0002-039	1041 Baldwin Street
14-0117-0002-038	1037 Baldwin Street
14-0117-0002-037	1031 Baldwin Street
14-0117-0002-036	1027 Baldwin Street
14-0117-0002-045	Baldwin Street
14-0117-0002-046	Baldwin Street
14-0116-0010-119	295 – 299 Ashby Street
14-0116-0010-089	931 Westview Drive
14-0116-0010-090	935 Westview Drive
14-0116-0010-091	939 Westview Drive
14-0116-0010-092	443 Westview Drive
14-0116-0010-093	Westview Drive
14-0116-0010-094	949 Westview Drive
14-0116-0010-095	953 Westview Drive
14-0116-0010-096	957 Westview Drive
14-0116-0010-108	961 Westview Drive
14-0116-0010-099	967 Westview Drive
14-0116-0010-100	975 Westview Drive
14-0116-0010-030	981 Westview Drive
14-0116-0010-029	985 Westview Drive
14-0116-0010-028	993 Westview Drive
14-0116-0010-027	Westview Drive
14-0116-0010-086	285 Ashby Street
14-0116-0010-085	279-281 Ashby Street
14-0116-0010-084	928-930 Frank Street
14-0116-0010-083	Frank Street
14-0116-0010-082	936 Frank Street
14-0116-0010-080	944 Frank Street
14-0116-0010-079	948 Frank Street
14-0116-0010-078	952 Frank Street
14-0116-0010-077	954 Frank Street
14-0116-0010-076	960 Frank Street
14-0116-0010-074	968 Frank Street
14-0116-0010-109	980 Frank Street
14-0117-0003-054-5	325 Joseph E. Lowery Blvd.
14-0116-0010-075-2	964 Frank Street
14-0117-0002-016-5	1006 Westview Drive
14-0117-0002-040-5	1047 Baldwin Street

- Condemned Lots

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

### **Magnolia Park Revitalization**

The properties listed below were acquired as part of the Magnolia Park revitalization and are candidates for demolition and/or disposition:

<b>Parcel I.D.</b>	<b>Property Address</b>
14-0010-0004-062-4	850 Thurmond Street NW
14-0110-0004-015-2	883 Spencer Street NW
14-0110-0004-016-0	887 Spencer Street NW
14-0110-0004-034-3	875 Booker Washington Drive NW
14-0110-0004-036-8	883 Booker Washington Drive NW
14-0110-0004-048-3	847 Spencer Street NW
14-0110-0004-053-3	834 Thurmond Street
14-0110-0004-054-1	838 Thurmond Street NW
14-0110-0004-056-6	855 Spencer Street NW
14-0110-0004-057-4	859 Spencer Street NW
14-0110-0004-059-0	835 Spencer Street
14-0110-0004-060-8	843 Spencer Street NW
14-0110-0004-061-6	846 Thurmond Street NW
14-0110-0004-064-0	842 Thurmond Street NW
14-0110-0005-006-0	804 Thurmond Street NW
14-0110-0005-021-9	797 Spencer Street NW
14-0110-0005-022-7	801 Spencer Street NW
14-0110-0005-089-6	791 Spencer Street NW
14-0110-0007-004-3	890/892 Booker Washington Drive
14-0110-0007-006-8	886 Magnolia St/Booker Washington
14-0110-0007-007-6	880 Booker Washington Drive
14-0110-0007-056-3	892 Magnolia Street NW
14-0110-0009-017-3	Carter Street NW
14-0110-0009-018-1	767 Carter Street NW
14-0110-0009-021-5	81 James P Brawley Drive
14-0110-0009-022-3	87 James P Brawley Drive
14-0110-0009-023-1	91 James P Brawley Drive
14-0110-0009-024-9	93 James P Brawley Drive
14-0110-0009-025-6	95 James P Brawley Drive
14-0110-0009-158-5	111 James P Brawley Drive NW

### **Carver Homes Revitalization**

The properties listed below were acquired as part of the Carver Homes revitalization and are candidates for demolition and/or disposition:

<b>Parcel I.D.</b>	<b>Property Address</b>
14-0072-0002-012-7	1623 Pryor Road SW
14-0073-LL-008-7	1463 South Pryor Road SW
14-0072-0002-007-7	1569 Pryor Road SW
14-0072-0002-031-7	Pryor Road SW
14-0072-0002-008-5	1599 Pryor Road SW

### University Homes Revitalization

The properties listed below were acquired as part of the University Homes revitalization and are candidates for demolition and/or disposition:

Parcel I.D.	Property Address
14-0084-0005-046-8	168 Vine Street
14-0084-0005-050-0	146 Vine Street
14-0084-0005-090-6	136 Vine Street
14-0084-0005-091-4	138 Vine Street
14-0084-0005-051-8	140 Vine Street
14-0084-0005-048-4	158 Vine Street
14-0084-0005-073-3	655 Fair Street
14-0084-0005-043-5	615 Fair Street
14-0084-0005-034	175 Walnut Street
14-0084-0005-047	162 Vine Street
14-0084-0005-044	172 Vine Street

### Harris Homes Revitalization

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

### Techwood/Clark Howell Homes Revitalization

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 G: Candidate Communities for Permanent Percentage-Based, Elderly, Disabled, or Non-Elderly Disabled Designations**

### **AHA Communities**

Antoine Graves\*  
Barge Road  
Cheshire Bridge  
Cosby Spear Towers  
East Lake Towers  
Georgia Avenue  
Graves Annex\*  
Hightower Manor  
John O. Chiles\*  
John O. Chiles Annex\*  
Juniper & 10th  
Marian Road  
Marietta Road  
M.L. King Tower\*  
Palmer House\*  
Peachtree Road  
Piedmont Road  
Roosevelt House\*

\* These communities are already in active redevelopment process to include one or more of the following: master planning, resident relocation, demolition, disposition, construction, or lease-up.

### **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.



## **Appendix H – Management Information for Owned/Managed Units and Assisted Units at Mixed-Income Communities – as of June 30, 2007**

### **Occupancy Rates**

Average Adjusted Occupancy Rate: At June 30, 2007, AHA had an average adjusted occupancy rate of 99% which is a combined adjusted average for AHA Affordable Communities and public housing assisted units at AHA-sponsored mixed-income communities. Table H-1 illustrates this combined average as well as adjusted occupancy rates for each AHA-owned Affordable community and public housing assisted units at each of the mixed-income communities sponsored by AHA.

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. The Quality of Life Initiative (QLI) directly affects the occupancy rate. AHA stopped leasing at the QLI properties once the demolition applications were submitted to HUD's Special Applications Center (SAC). The occupancy rates at these properties will continually drop until the demolition applications are approved. Once the demolition applications are approved, while the population will continue to decrease as a result of relocation, the occupancy rate will remain 100% for those properties as the vacant units will be counted as units approved for demolition and will not count against the occupancy rate.

Target Average Adjusted Occupancy: The occupancy rate may drop at the end of FY 2008 if the seven demolition applications (Bankhead Courts, Bowen Homes, Herndon Homes, Hollywood Courts, Roosevelt House and Palmer House) that are currently with SAC under review have not been approved by June 30, 2008. Once these demolition applications are approved, the occupancy rate will improve and AHA projects that the occupancy rate will exceed the 98% benchmark by the end of FY 2009. Properties that are totally vacant due to QLI or HOPE VI revitalizations will be dropped from the report. Jonesboro North, Jonesboro South, U-Rescue Villa, University Homes, Leila Valley, Antoine Graves and Graves Annex have all been vacated during FY 2008. AHA anticipates that Martin Luther King Tower, Thomasville Heights and Bankhead Courts will be totally vacant by the end of FY 2009.

Mixed-Income Communities: In each of the following tables, the Mixed-Income section reflects the portfolio as of June 30, 2007.

**Appendix H – Management Information for Owned/Managed Units and Assisted Units at Mixed-Income Communities – as of June 30, 2007**

**H-1 Public Housing Assisted Communities – Occupancy Rate Levels**

<b>Program/Community Type</b>	<b>Target</b>	<b>Percentage of Occupancy Level</b>	<b>Difference</b>
<b>High-Rise</b>			
Antoine Graves	98%	100%	2%
Barge Road	98%	99%	1%
Cheshire Bridge	98%	99%	1%
Cosby Spear Towers	98%	100%	2%
East Lake Towers	98%	99%	1%
Georgia Avenue	98%	100%	2%
Graves Annex	98%	100%	2%
Hightower Manor	98%	99%	1%
Juniper & 10 <sup>th</sup>	98%	100%	2%
M.L. King Tower	98%	100%	2%
Marian Road	98%	100%	2%
Marietta Road	98%	100%	2%
Palmer House	98%	100%	2%
Peachtree Road	98%	99%	1%
Piedmont Road	98%	100%	2%
Roosevelt House	98%	98%	0%
<b>High-Rise Totals</b>	<b>98%</b>	<b>100%</b>	<b>2%</b>
<b>Family</b>			
Bankhead Courts	98%	98%	0%
Bowen Apartments	98%	98%	0%
Englewood Manor	98%	100%	2%
Herndon Homes	98%	99%	1%
Hollywood Courts	98%	99%	1%
Jonesboro North	98%	100%	2%
Jonesboro South	98%	100%	2%
Leila Valley	98%	100%	2%
Martin St. Plaza	98%	97%	-1%
Thomasville Heights	98%	98%	0%
University Apts.	98%	100%	2%
U-Rescue Villa	98%	100%	2%
Westminster	98%	100%	2%
<b>Family Totals</b>	<b>98%</b>	<b>99%</b>	<b>1%</b>
<b>Mixed-Income</b>			
Ashley Collegetown	98%	97%	-1%
Ashley Courts at Cascade	98%	97%	-1%
Ashley Terrace at West End	98%	100%	2%
Centennial Place	98%	98%	0%
Columbia Commons	98%	90%	-8%
Columbia Village	98%	100%	2%
Magnolia Park	98%	99%	1%
Summerdale Commons	98%	74%	-24%
The Villages at Castleberry Hill	98%	98%	0%
The Villages at Carver	98%	96%	-2%
The Villages of East Lake	98%	99%	1%
West Highlands at Columbia Crest	98%	97%	-1%
West Highlands at Columbia Park Citi	98%	95%	-3%
West Highlands at Columbia Estates	98%	98%	0%
<b>Mixed-Income Totals</b>	<b>98%</b>	<b>97%</b>	<b>-1%</b>
<b>PHA TOTAL</b>	<b>98%</b>	<b>99%</b>	<b>1%</b>

## **Appendix H – Management Information for Owned/Managed Units and Assisted Units at Mixed-Income Communities – as of June 30, 2007**

### **Rent Collections**

Average Percentage of Uncollected Rents: AHA's average percentage of uncollected rents was 2% as of June 30, 2007. 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 H-2.

Issues and Proposed Actions. Although the collective percentage is on par with the target percentage for this benchmark, there are several communities as highlighted on Table H-2 where percentages exceeded the target. Most of these communities are impacted by QLI, and as such, families of these communities will be connected to relocation specialists and human services and support to help them address uncollected rent issues prior to relocation and to help prepare them as they make the move. Human Services and support will be provided to all QLI impacted families for a 27-month period to help families transition and adjust to their new living arrangements.

Target Projection for Percentage of Uncollected Rents: AHA anticipates that even with the issue of uncollected rent at some of the family properties, it is anticipated that the average percentage of uncollected rents will be at or below the 2% benchmark for June 30, 2008 and for FY 2009. This is likely since this issue is primarily at the family communities and as these communities continue to come off-line as a result of QLI or revitalization activities, the percentage will predominately reflect that of the high-rise communities, which are not experiencing the same issue.

**Appendix H – Management Information for Owned/Managed Units and Assisted Units at Mixed-Income Communities – as of June 30, 2007**

**H-2 Public Housing Assisted Communities Rent Collection**

<b>Program/Community Type</b>	<b>Target</b>	<b>Percentage of Rent Uncollected</b>	<b>Difference</b>
<b>High-Rise</b>			
Antoine Graves	2%	0%	-2%
Barge Road	2%	0%	-2%
Cheshire Bridge	2%	0%	-2%
Cosby Spear Towers	2%	1%	-1%
East Lake Towers	2%	0%	-2%
Georgia Avenue	2%	0%	-2%
Graves Annex	2%	0%	-2%
Hightower Manor	2%	1%	-2%
Juniper & 10 <sup>th</sup>	2%	0%	-2%
M.L. King Tower	2%	0%	-2%
Marian Road	2%	0%	-2%
Marietta Road	2%	0%	-2%
Palmer House	2%	0%	-2%
Peachtree Road	2%	0%	-2%
Piedmont Road	2%	0%	-2%
Roosevelt House	2%	0%	-2%
<b>High-Rise Totals</b>	<b>2%</b>	<b>0%</b>	<b>-2%</b>
<b>Family</b>			
Bankhead Courts	2%	3%	1%
Bowen Apartments	2%	2%	0%
Englewood Manor	2%	3%	1%
Herndon Homes	2%	2%	0%
Hollywood Courts	2%	1%	-1%
Jonesboro North	2%	4%	2%
Jonesboro South	2%	4%	2%
Leila Valley	2%	4%	2%
Martin St. Plaza	2%	0%	-2%
Thomasville Heights	2%	1%	-1%
University Apts.	2%	1%	-2%
U-Rescue Villa	2%	1%	-1%
Westminster	2%	1%	-1%
<b>Family Totals</b>	<b>2%</b>	<b>2%</b>	<b>0%</b>
<b>Mixed-Income</b>			
Ashley Collegetown	2%	5%	3%
Ashley Courts at Cascade	2%	9%	7%
Ashley Terrace at West End	2%	1%	1%
Centennial Place	2%	-1%	3%
Columbia Commons	2%	11%	9%
Columbia Village	2%	8%	6%
Magnolia Park	2%	3%	7%
Summerdale Commons	2%	0%	2%
The Villages at Castleberry Hill	2%	-2%	4%
The Villages at Carver	2%	1%	1%
The Villages of East Lake	2%	7%	5%
West Highlands at Columbia Crest	99%	92%	-7%
West Highlands at Columbia Park Citi	2%	6%	4%
West Highlands at Columbia Estates	2%	3%	1%
<b>Mixed-Income Totals</b>	<b>2%</b>	<b>3%</b>	<b>1%</b>
<b>PHA TOTAL</b>	<b>2%</b>	<b>2%</b>	<b>0%</b>

## **Appendix H – Management Information for Owned/Managed Units and Assisted Units at Mixed-Income Communities – as of June 30, 2007**

### **Work Orders**

Percentage of Emergency Work Orders With a Response Time of Less than 24 Hours/ Average Response Time for Routine Work Orders within 7 days. As of June 30, 2007, 99% of all emergency work orders received were completed or abated in less than 24 hours. Table H-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. Table H-4 reflects that non-emergency routine work orders are being addressed on average of one (1) day as of June 30, 2007 and 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, for the most part, responsive to emergency and non-emergency work order turnaround. Some communities experienced levels below the benchmark due to 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 99% of the time and complete routine non-emergency work orders in less than 7 days. AHA and its development partners and PMCOs expect to continue meeting the MTW benchmark for handling emergency and routine work orders during FY 2008 and FY 2009.

**Appendix H – Management Information for Owned/Managed Units and Assisted Units at Mixed-Income Communities – as of June 30, 2007**

**H-3 Public Housing Assisted Communities Emergency Work Order Responses**

<b>Program/Community Type</b>	<b>Target</b>	<b>% of Emergency Work Orders Completed or Abated within 24 hours</b>	<b>Difference</b>
<b>High-Rise</b>			
Antoine Graves	99%	100%	1%
Barge Road	99%	100%	1%
Cheshire Bridge	99%	100%	1%
Cosby Spear Towers	99%	100%	1%
East Lake Towers	99%	99%	0%
Georgia Avenue	99%	100%	1%
Graves Annex	99%	99%	0%
Hightower Manor	99%	100%	1%
Juniper & 10 <sup>th</sup>	99%	100%	1%
M.L. King Tower	99%	100%	1%
Marian Road	99%	100%	1%
Marietta Road	99%	100%	1%
Palmer House	99%	99%	0%
Peachtree Road	99%	99%	0%
Piedmont Road	99%	100%	1%
Roosevelt House	99%	100%	1%
<b>High-Rise Totals</b>	<b>99%</b>	<b>100%</b>	<b>1%</b>
<b>Family</b>			
Bankhead Courts	99%	100%	1%
Bowen Apartments	99%	100%	1%
Englewood Manor	99%	100%	1%
Herndon Homes	99%	100%	1%
Hollywood Courts	99%	100%	1%
Jonesboro North	99%	100%	1%
Jonesboro South	99%	100%	1%
Leila Valley	99%	100%	1%
Martin St. Plaza	99%	100%	1%
Thomasville Heights	99%	99%	0%
University Apts.	99%	100%	1%
U-Rescue Villa	99%	100%	1%
Westminster	99%	100%	1%
<b>Family Totals</b>	<b>99%</b>	<b>100%</b>	<b>1%</b>
<b>Mixed-Income</b>			
Ashley Collegetown	99%	100%	1%
Ashley Courts at Cascade	99%	88%	-11%
Ashley Terrace at West End	99%	100%	1%
Centennial Place	99%	100%	1%
Columbia Commons	99%	93%	-6%
Columbia Village	99%	98%	-1%
Magnolia Park	99%	100%	1%
Summerdale Commons	99%	87%	-12%
The Villages at Castleberry Hill	99%	100%	1%
The Villages at Carver	99%	100%	1%
The Villages of East Lake	99%	100%	1%
West Highlands at Columbia Crest	99%	92%	-7%
West Highlands at Columbia Park Citi	99%	100%	1%
West Highlands at Columbia Estates	99%	100%	1%
<b>Mixed-Income Totals</b>	<b>99%</b>	<b>96%</b>	<b>-3%</b>
<b>PHA TOTAL</b>	<b>99%</b>	<b>99%</b>	<b>0%</b>

**Appendix H – Management Information for Owned/Managed Units and Assisted Units at Mixed-Income Communities – as of June 30, 2007**

**H-4 Public Housing Assisted Communities Routine Work Order Responses**

<b>Program/Community Type</b>	<b>Target</b>	<b>Average Number of Days to Complete Routine Work Orders</b>	<b>Difference</b>
<b>High-Rise</b>			
Antoine Graves	7	1	-6
Barge Road	7	1	-6
Cheshire Bridge	7	1	-6
Cosby Spear Towers	7	2	-5
East Lake Towers	7	1	-6
Georgia Avenue	7	1	-6
Graves Annex	7	1	-6
Hightower Manor	7	2	-6
Juniper & 10 <sup>th</sup>	7	1	-6
M.L. King Tower	7	1	-6
Marian Road	7	1	-6
Marietta Road	7	1	-6
Palmer House	7	1	-6
Peachtree Road	7	1	-6
Piedmont Road	7	1	-6
Roosevelt House	7	1	-6
<b>High-Rise Totals</b>	<b>7</b>	<b>1</b>	<b>-6</b>
<b>Family</b>			
Bankhead Courts	7	2	-5
Bowen Apartments	7	2	-5
Englewood Manor	7	1	-6
Herndon Homes	7	1	-6
Hollywood Courts	7	1	-6
Jonesboro North	7	2	-5
Jonesboro South	7	2	-5
Leila Valley	7	2	-5
Martin St. Plaza	7	2	-5
Thomasville Heights	7	1	-6
University Apts.	7	1	-6
U-Rescue Villa	7	2	-5
Westminster	7	2	-5
<b>Family Totals</b>	<b>7</b>	<b>2</b>	<b>-5</b>
<b>Mixed-Income</b>			
Ashley Collegetown	7	1	-6
Ashley Courts at Cascade	7	1	-6
Ashley Terrace at West End	7	1	-6
Centennial Place	7	1	-6
Columbia Commons	7	1	-6
Columbia Village	7	2	-6
Magnolia Park	7	2	-5
Summerdale Commons	7	1	-6
The Villages at Castleberry Hill	7	1	-6
The Villages at Carver	7	1	-6
The Villages of East Lake	7	1	-6
West Highlands at Columbia Crest	7	1	-6
West Highlands at Columbia Park Citi	7	1	-6
West Highlands at Columbia Estates	7	1	-6
<b>Mixed-Income Totals</b>	<b>7</b>	<b>1</b>	<b>-6</b>
<b>PHA TOTAL</b>	<b>7</b>	<b>1</b>	<b>-6</b>



## **Appendix H – Management Information for Owned/Managed Units and Assisted Units at Mixed-Income Communities – as of June 30, 2007**

### **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 on a monthly basis. 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 5% 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 2009. Table C-5 shows the percentage of units and common areas inspected as of June 30, 2007.

Issues and Proposed Actions: AHA has not had any issues with inspections over FY 2008 and does not foresee any issues for FY 2009.

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

During FY 2009, 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. Overall, 46% of AHA-owned Affordable Communities scored 80 or better on the REAC inspections, 80% of the family properties scored less than 80 and 5 of those properties scored below a 50. Both the REAC and UPCS inspections confirms AHA's strategy to relocate the residents and demolish the majority of the obsolete family properties.

## **Appendix H – Management Information for Owned/Managed Units and Assisted Units at Mixed-Income Communities – as of June 30, 2007**

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.** This inspection focuses 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.
6. **Accounting Review.** Reviews the PMCO financial operations at the property level. The audit includes and is not limited to: Accounts Payable, Tenant Accounts Receivable, Cash Handling, Expense Coding, Write-offs and Adjustments, etc.
7. **Procurement and Labor Compliance Review.** During this review AHA spot checks a sample of the PMCO corporate and site procurement files to assess the PMCO's compliance with their sourcing strategy as well as their documentation as required for reporting based on Davis-Bacon and Related Acts, and applicable Socioeconomic Programs.

## **Appendix H – Management Information for Owned/Managed Units and Assisted Units at Mixed-Income Communities – as of June 30, 2007**

8. **Rental Integrity Monitoring (RIM) Review.** AHA reviews a sample of resident files at the properties to assess each PMCO's compliance with the documentation requirements and calculation of resident rent based on the AHA Occupancy Guidebook and applicable federal regulations.

### **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 H – Management Information for Owned/Managed Units and Assisted Units at Mixed-Income Communities – as of June 30, 2007**

**H-5 Public Housing Assisted Communities Unit and Common Areas Inspection Levels**

<b>Program/Community Type</b>	<b>Target</b>	<b>Percentage of Units and Common Areas Inspected</b>	<b>Difference</b>
<b>High-Rise</b>			
Antoine Graves	100%	100%	0%
Barge Road	100%	100%	0%
Cheshire Bridge	100%	100%	0%
Cosby Spear Towers	100%	100%	0%
East Lake Towers	100%	100%	0%
Georgia Avenue	100%	100%	0%
Graves Annex	100%	100%	0%
Hightower Manor	100%	100%	0%
Juniper & 10 <sup>th</sup>	100%	100%	0%
M.L. King Tower	100%	100%	0%
Marian Road	100%	100%	0%
Marietta Road	100%	100%	0%
Palmer House	100%	100%	0%
Peachtree Road	100%	100%	0%
Piedmont Road	100%	100%	0%
Roosevelt House	100%	100%	0%
<b>High-Rise Totals</b>	<b>100 %</b>	<b>100 %</b>	<b>0 %</b>
<b>Family</b>			
Bankhead Courts	100%	100%	0%
Bowen Apartments	100%	100%	0%
Englewood Manor	100%	100%	0%
Herndon Homes	100%	100%	0%
Hollywood Courts	100%	100%	0%
Jonesboro North	100%	100%	0%
Jonesboro South	100%	100%	0%
Leila Valley	100%	100%	0%
Martin St. Plaza	100%	100%	0%
Thomasville Heights	100%	100%	0%
University Apts.	100%	100%	0%
U-Rescue Villa	100%	100%	0%
Westminster	100%	100%	0%
<b>Family Totals</b>	<b>100 %</b>	<b>100 %</b>	<b>0 %</b>
<b>Mixed-Income</b>			
Ashley Collegetown	100%	100%	0%
Ashley Courts at Cascade	100%	100%	0%
Ashley Terrace at West End	100%	100%	0%
Centennial Place	100%	100%	0%
Columbia Commons	100%	100%	0%
Columbia Village	100%	100%	0%
Magnolia Park	100%	100%	0%
Summerdale Commons	100%	100%	0%
The Villages at Castleberry Hill	100%	100%	0%
The Villages at Carver	100%	100%	0%
The Villages of East Lake	100%	100%	0%
West Highlands at Columbia Crest	100%	100%	0%
West Highlands at Columbia Park Citi	100%	100%	0%
West Highlands at Columbia Estates	100%	100%	0%
<b>Mixed-Income Totals</b>	<b>100 %</b>	<b>100 %</b>	<b>0 %</b>
<b>PHA TOTAL</b>	<b>100 %</b>	<b>100 %</b>	<b>0 %</b>

## **Appendix I: 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 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. Under AHA's FY 2008 Implementation Plan, AHA 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. AHA made this clarification in light of changes that HUD 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 Statement of Housing Choice Policies included in this Plan submission. AHA has described the projects and policy changes AHA will implement during FY 2009 which will address rent reasonableness, housing opportunities and deconcentration under the Quality of Life Initiative (Part II of this Plan) and Re-Engineering the Housing Choice Voucher Program (Part IV of this Plan).

### **Inspections**

As of June 30, 2007, AHA completed annual inspections on 100% of the total units under contract and performed quality control inspections on 6% of all approved units. AHA will continue to enforce its enhanced inspections standards during FY 2009 and inspect 98% of all units under contract. Quality Control inspections will also continue for a minimum of 5% of all initial inspections.

## Appendix J – QLI Fact Sheet



### 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 3,000 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

## Appendix J – QLI Fact Sheet



### 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 (As of March 21, 2008)

Property	Affected Residents	Start Date	End Date	Status (As of 2/20/2008)
<b>Phase I **</b>				
Leila Valley	124	4/18/2007	11/30/2007	Completed
U-Rescue Villa	70	7/31/2007	1/31/2008	Completed
Jonesboro North	100	7/31/2007	1/31/2008	Completed
Jonesboro South	150	8/6/2007	1/31/2008	Completed
Englewood Manor	320	7/31/2008	2/29/2008	On Schedule
<b>Phase II</b>				
Thomasville Heights	342	6/1/2008	5/31/09	Pending HUD approval of demolition application
Bankhead Courts	603	7/1/2008	8/31/09	(Same as above)
Bowen Homes	369	7/1/2008	6/30/09	(Same as above)
Herndon Homes	197	1/1/2009	12/31/09	(Same as above)
Hollywood Courts	263	1/1/2009	12/31/09	(Same as above)
Roosevelt House*	246	5/1/2009	2/28/10	(Same as above)
Palmer House*	252	5/1/2009	2/28/10	(Same as above)

Source: Atlanta Housing Authority

\*Senior High-Rises

\*\* Demolition Applications for Phase I communities have been reviewed and approved by the U.S. Department of Housing and Urban Development (HUD)

### More information

- Barney Simms, *Chief External Affairs Officer*  
(404) 817-7449
- Reneé Bentley, *Vice President of Corporate Strategies*  
(404) 817-7213



Atlanta Housing Authority  
QLI/REVITALIZATION RELOCATION SCHEDULE  
(February 13, 2008)

PROPERTY	Begin Date	End Date	Months	PMCO	Affected Residents	Resident Leaders	FY 2007								FY 2008												FY 2009												FY 2010										
							Nov-06	Dec-06	Jan-07	Feb-07	Mar-07	Apr-07	May-07	Jun-07	Jul-07	Aug-07	Sep-07	Oct-07	Nov-07	Dec-07	Jan-08	Feb-08	Mar-08	Apr-08	May-08	Jun-08	Jul-08	Aug-08	Sep-08	Oct-08	Nov-08	Dec-08	Jan-09	Feb-09	Mar-09	Apr-09	May-09	Jun-09	Jul-09	Aug-09	Sep-09	Oct-09	Nov-09	Dec-09	Jan-10	Feb-10	Mar-10		
Leila Valley	4/18/07*	11/30/07	8	LANE	124	Tammy Traylor															Completed																												
Jonesboro North	7/31/07	1/31/08	7	LANE	99	Faye Stephens																																											
Jonesboro South	8/6/07	1/31/08	7	LANE	148	Stephanie Haynes																																											
U-Rescue	7/31/07	1/31/08	7	LANE	70	Linda Martin																																											
Englewood Manor	7/31/07	2/28/08	8	IMS	310	Inez Marshall																																											
QLI PHASE II																																																	
Thomasville Heights	6/1/08	5/31/09	12	IMS	342	Dorothy Cullins																					Phase I - 171			Phase I - 171			4																
Bowen Homes	7/1/08	8/31/09	14	LANE	603	Shirley Hightower																					II-A				One Phase - 603										12								
Bankhead Courts	7/1/08	6/30/09	12	HBT	369	Jeffrey Walker																					Phase I - 185			Phase II - 184			4																
Hollywood Courts	1/1/09	12/31/09	12	HBT	197	Diane Wright																																											
Herndon Homes	1/1/09	12/31/09	12	HBT	263	Laura Lawson																																											
Palmer House	5/1/09	2/28/10	10	IMS	246	Eleanor Rayton																																											
Roosevelt House	5/1/09	2/28/10	10	IMS	252	Henry Grissett																																											
				Total:	3023																																												

All Start Dates represent dates vouchers will be issued

Relocation Activity Key		Number of Staff	
QLI Relocation			
		Community Groupings	

\*44 Families were issued 90-day notices and vouchers on 4/18/2007 due to structural issues, the official 90-day notices and vouchers were issued in August 2007

## Appendix K: Re-Engineering the Housing Choice Program – At A Glance

During FY 2009, AHA will continue the re-engineering of the Housing Choice Voucher Program focused on addressing three (3) strategic goals:

- Enhance sustainability of the HC program including the reduction of administrative burdens and operational cost
- Increase active involvement and participation by the private market
- Improve customer service to participants and landlords

In order to accomplish these goals, AHA will utilize the strategies and key activities shown below. The strategies focus on prudent fiscal management, enhanced partnering with the landlord community, participant self-sufficiency, and improvement of operational infrastructure.

AHA GOALS		HOUSING CHOICE STRATEGIES / KEY ACTIVITIES
LONG TERM SUSTAINABILITY	Fiscal	<ul style="list-style-type: none"> <li>■ Manage expenses and payments including monitoring of revenue collection for impact on HC implementation activities</li> </ul>
	Landlord Partnering	<ul style="list-style-type: none"> <li>■ Attract and manage landlord network including increased multi-family units and greater number of higher quality units in program</li> <li>■ Expand percentage of units in low poverty areas</li> <li>■ Develop HAP business system that is private sector / landlord focused</li> </ul>
	Participant Self-Sufficiency	<ul style="list-style-type: none"> <li>■ Manage customer focused voucher program to assist low-income families and provide increased housing choice</li> <li>■ Align wait list management and eligibility process with other AHA functional areas</li> <li>■ Improve recertification process</li> <li>■ Continue implementation of programs to enhance compliance with MTW voucher requirements</li> <li>■ Improve business system to connect families to the network of support services providers</li> <li>■ Implement options for innovations in recertification frequency</li> </ul>
	Infrastructure	<ul style="list-style-type: none"> <li>■ Implement private sector business model for Housing Choice operations</li> <li>■ Enhance business systems and work processes to improve effectiveness and efficiency while the HC program grows</li> <li>■ Analyze key financial and operational data collected on a weekly, monthly and quarterly basis and use results to enhance routine operations</li> <li>■ Employ periodic analysis to determine need for policy and / or procedural changes</li> <li>■ Plan / develop technology enhancements for both near term and long term operational improvements</li> </ul>

The Housing Authority of the City of Atlanta, Georgia

## Fiscal Year 2009 Comprehensive Operating and Capital Budget

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

Draft Budget as of April 30, 2008



AHA Programs	Non-Development Related				Development Related			Total Development Funds	AHA Total
	MTW Funds	State and Local Funds	Non-HUD	Total before Development	HUD Funded Revitalization Activities	State and Local Funds	Non-HUD Development Activities		
<b>OPERATING REVENUES</b>									
Tenant Dwelling Revenue	\$9,400,000			\$9,400,000				\$0	\$9,400,000
Low Income Operating Subsidy	27,000,000			27,000,000				0	27,000,000
Housing Choice Operating Subsidy - MTW Block Grant	155,000,000			155,000,000				0	155,000,000
Housing Choice Operating Subsidy - Other	15,000,000			15,000,000				0	15,000,000
Capital Funds Program (CFP) Operating Items	0			0				0	0
HOPE VI, Replacement Housing Factor, and other Development Funds	0			0	\$3,700,000			3,700,000	3,700,000
Development and Transaction Fees				0			2,000,000	2,000,000	2,000,000
Other Revenue	0	\$17,000	\$1,600,000	1,617,000			\$0	0	1,617,000
<b>Total Operating Income</b>	<b>\$206,400,000</b>	<b>\$17,000</b>	<b>\$1,600,000</b>	<b>\$208,017,000</b>	<b>\$3,700,000</b>	<b>\$0</b>	<b>\$2,000,000</b>	<b>\$5,700,000</b>	<b>\$213,717,000</b>
<b>Uses</b>									
<b>OPERATING EXPENSES</b>									
Administrative	\$51,863,000	\$17,000	\$320,000	\$52,200,000	\$900,000		\$0	\$900,000	\$53,100,000
Housing Assistance Payments	102,800,000			102,800,000				0	102,800,000
Resident Services	8,600,000			8,600,000	2,300,000			2,300,000	10,900,000
Relocation	8,500,000			8,500,000	500,000			500,000	9,000,000
Utilities	8,100,000			8,100,000				0	8,100,000
Ordinary Maintenance and Operation	12,500,000			12,500,000				0	12,500,000
Protective Services	4,500,000			4,500,000				0	4,500,000
General Expenses	6,000,000			6,000,000				0	6,000,000
<b>Total Operating Expenses</b>	<b>\$202,863,000</b>	<b>\$17,000</b>	<b>\$320,000</b>	<b>\$203,200,000</b>	<b>\$3,700,000</b>	<b>\$0</b>	<b>\$0</b>	<b>\$3,700,000</b>	<b>\$206,900,000</b>
<b>NET OPERATING GAIN/(LOSS)</b>									
before Depreciation and Amortization	\$3,537,000	\$0	\$1,280,000	\$4,817,000	\$0	\$0	\$2,000,000	\$2,000,000	\$6,817,000
Depreciation and Amortization Expense	11,000,000			11,000,000				0	11,000,000
<b>NET OPERATING GAIN/(LOSS)</b>									
after Depreciation and Amortization	(\$7,463,000)	\$0	\$1,280,000	(\$6,183,000)	\$0	\$0	\$2,000,000	\$2,000,000	(\$4,183,000)

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

AHA Programs	MTW Funds	State and Local Funds	Non-HUD	Total before Development	HUD Funded Revitalization Activities	State and Local Funds	Non-HUD Development Activities	Total Development Funds	AHA Total
<b>NON-OPERATING REVENUES</b>									
Capital Funds Program (CFP) for Capital Items and Demolition	\$15,400,000			\$15,400,000				\$0	\$15,400,000
HOPE VI, RHF and Development Funds				0	16,000,000			16,000,000	16,000,000
City of Atlanta Public Improvement Funds				0		\$4,000,000		4,000,000	4,000,000
Interest Income	1,000,000		100,000	1,100,000			\$900,000	900,000	2,000,000
Other Sources of Income				0			400,000	400,000	400,000
<b>Total Non-operating Revenues</b>	<b>\$16,400,000</b>	<b>\$0</b>	<b>\$100,000</b>	<b>\$16,500,000</b>	<b>\$16,000,000</b>	<b>\$4,000,000</b>	<b>\$1,300,000</b>	<b>\$21,300,000</b>	<b>\$37,800,000</b>
<b>NON-OPERATING EXPENDITURES</b>									
Impairment Loss	\$18,000,000			\$18,000,000				\$0	\$18,000,000
Demolition	7,800,000			7,800,000	\$6,000,000			6,000,000	13,800,000
Extraordinary Expenses	200,000			200,000				0	200,000
Public Improvements	200,000			200,000	2,600,000	\$4,000,000		6,600,000	6,800,000
Interest Expense	500,000			500,000				0	500,000
<b>Total Non-operating Uses of Funds</b>	<b>\$26,700,000</b>	<b>\$0</b>	<b>\$0</b>	<b>\$26,700,000</b>	<b>\$8,600,000</b>	<b>\$4,000,000</b>	<b>\$0</b>	<b>\$12,600,000</b>	<b>\$39,300,000</b>
				0				0	0
<b>NET NON-OPERATING GAIN/(LOSS)</b>	<b>(\$10,300,000)</b>	<b>\$0</b>	<b>\$100,000</b>	<b>(\$10,200,000)</b>	<b>\$7,400,000</b>	<b>\$0</b>	<b>\$1,300,000</b>	<b>\$8,700,000</b>	<b>(\$1,500,000)</b>
				0				0	0
<b>CHANGE IN NET ASSETS</b>	<b>(\$17,763,000)</b>	<b>\$0</b>	<b>\$1,380,000</b>	<b>(\$16,383,000)</b>	<b>\$7,400,000</b>	<b>\$0</b>	<b>\$3,300,000</b>	<b>\$10,700,000</b>	<b>(\$5,683,000)</b>

The Housing Authority of the City of Atlanta, Georgia

### The FY2009 Budget

**NOTE: At the time of publication of the Annual CATALYST Plan, AHA has not yet finalized the FY2009 Budget. AHA will provide the Budget to HUD upon approval by AHA's Board of Commissioners.**

AHA will enter its sixth year of its 7-year MTW Agreement in FY2009. The Comprehensive Operating and Capital Budget (the Budget) for FY2009 estimates an decrease in Net Assets of **\$5.7** million, primarily due to the decrease in capital assets as AHA demolishes properties as part of its QLI program.

#### Change in Net Assets

Under its revitalization efforts, AHA serves as the Sponsor during the development phase of mixed-developments and thereafter relates to these properties as a lender, investor and ground lessor. AHA's Net Assets increase when it provides loans to the owner of mixed-income developments and will earn approximately **\$2.0** million in development and other transaction fees during FY2009. This is in addition to the **\$7.4** million increase in net assets resulting from construction funded by HUD HOPE VI, Replacement Housing Factor, and Development grants.

In addition, AHA's Net Assets increase from capital improvements made to AHA owned properties. The capital improvements are funded from Capital Fund Program grants from HUD. AHA anticipates about **\$7.6** million to be used for

such capital improvements. The capital improvement schedule for FY2009 is found in [Appendix M](#).

Offsetting these increases in net assets, however, is **\$29** million in impairment Losses and Depreciation. The Impairment Losses and much of the Depreciation are the direct result of closing AHA properties and demolishing them under the QLI program, which requires AHA to remove the properties' values from its Balance Sheet, reducing Net Assets.

#### Operating Revenues over Expenses

On a consolidated basis, AHA expects operating revenues to exceed operating expenses by **\$6.8** million before depreciation and amortization. AHA operations include both MTW-related programs and non-MTW programs. The non-MTW programs are projected to provide a net operating income of about **\$3.3** million in FY2009 of which **\$2.0** million relates to the developer and other transaction fees earned in conjunction with mixed income transactions.

Based on current funding projections and planned MTW authorized expenditures, MTW Operating Revenues will exceed Operating Expenses by **\$3.5** million before depreciation and amortization.

#### MTW Working Capital (Reserves)

AHA's MTW working capital (current assets less current liabilities) is estimated to be **\$40** million at June 30, 2008. This "reserve" level is the result of increased funding in the early years of the MTW Agreement. These reserves are sufficient to support AHA's MTW operations in FY2008 and should increase to \$46 million by June 30, 2009.

The Housing Authority of the City of Atlanta, Georgia

### **Congressional Appropriations Process and HUD funding**

The AHA FY2009 budget includes six months which will be funded in HUD's Funding Year (HFY) 2008. HUD has provided the HFY2008 funding level for AHA's Housing Choice program but has not yet provided the funding level for the Public Housing Operating Fund.

The last six months of AHA's FY2009 budget will be funded using HFY 2009 funds. The Public Housing, Housing Choice Voucher and Capital programs are funded through an annual appropriations process. Because the Congressional appropriations process is not complete, AHA cannot be sure of the outcome of the appropriations process and its impact on AHA's FY2009 funding levels, especially in light of competing national priorities.

In light of these uncertainties, AHA's FY2009 budget is based on the best information available at the time of publication. An amendment to the FY2009 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 FY2009 Implementation Plan, AHA's activities for FY2009 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 our residents and the preservation of AHA-owned properties.
- Improve the quality of life for residents and the quality of our 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.

### **Other Assumptions**

Effective in 2006, HUD funds both Housing Choice and Low Income Housing Programs on a Calendar Year Basis (January through December). In contrast, AHA, operates on a Fiscal Year basis (July through June.) Therefore, AHA's budget year FY2009 crosses two HUD Funding Years (HFY), 2008 and 2009.

At the time of publication, HUD has not provided AHA final funding numbers for HFY 2008 Low Income Housing Subsidy or the Capital Fund Program award amount for HFY 2008. HUD also has provided no

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

definitive information regarding the levels of funding in HFY2009 which will affect the last 6 months of AHA's FY 2009. Given this lack of information, AHA has included its best estimates based on prior year funding levels.

- 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 of this document.
- All Multifamily Real Estate Properties owned by AHA and its corporate headquarters building will continue to be managed by professional property management companies.
- This budget includes funding for 271 full-time employees. This is an increase from the 244 authorized in FY2006 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 2009. This budget provides for that increase.
- In 2007 AHA instituted a defined contribution employee retirement plan in place of its defined benefit plan. AHA plans to spend \$1.7 in defined compensation pension payments for retired and grandfathered employees and \$500,000 in employer match for the defined contribution plan.
- 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 \$2.0 million based on expected balances and an interest rate of 1.4%, 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



The Housing Authority of the City of Atlanta, Georgia

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.

The Housing Authority of the City of Atlanta, Georgia

## Funding Category Assumptions

### Low Income Operating Subsidy

- AHA receives Low Income Operating Subsidy as part of its MTW Block Grant. In AHA's FY2008, AHA estimates HUD will provide \$27 million in Low Income Operating Subsidy spread across two HUD funding years (HFY) which coincide with calendar years.
- **July-December 2008 HUD Funding.** HUD implemented a new Low Income Operating Subsidy funding methodology beginning in Calendar Year 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 HFY2008 (Calendar Year 2008) to HUD in April 2008. HUD is using this calculation as the basis for funding January through December 2008, which includes the first six months of AHA's Fiscal Year 2009. Based on the individual property calculations and after adjusting for the currently projected proration of 84%, AHA estimates that it will be eligible for \$29 million in 2008 operating and utility subsidy, of which \$14.5 million will be earned in AHA FY2009. HUD estimates that it will have final HFY subsidy funding levels established after May 2008.
- The projected number of Public Housing Assisted unit-months of 81,479 used in the HFY2008 Low Income Operating Subsidy funding calculation submitted to HUD was derived from the number of units eligible for subsidy in 2008 as of March 31, 2008. AHA and HUD will revise the calculation no later than July 15, 2008 based on actual occupancy through June 30, 2008.
- Communities involved in relocation under HOPE VI or QLI programs were budgeted to receive prorated subsidy in accordance with HUD regulations.
- 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.
- **January-June 2009 HUD Funding.** The second half of AHA's FY2009 runs from January through June 2009. Calculation of this subsidy will not be submitted to HUD until September 2009 and will be based on property occupancy for AHA's FY2008, adjusted for properties coming on and off line. At this time, HUD has published neither the monthly Property Allowance Levels (PEL) nor the proration factors for 2009. A rough estimate of total HFY2008 Operating subsidy is \$26 million, with \$13 million earned in AHA's FY2009. 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.
- **Rental Revenue.** AHA expects to receive \$ 10.1 million in resident rental income and \$100,000 in other property related income. The minimum rent will continue at \$125 per month. No changes in FY2009 rent structures are anticipated in this budget. Rental Revenue estimates do, however, reflect the overall

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

reduction in rent revenue as tenants relocate from QLI properties scheduled for demolition or disposition.

- **Mixed-Income Communities.** Mixed-income communities are budgeted using an agreed upon methodology outlined in the regulatory and operating agreements between AHA and the owner entities
- 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.
- **AHA-Owned Affordable Properties.** 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 FY2008 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:

- Achievement of objectives and performance goals of AHA, as owner.
- Management fees are based on a flat per door rate and are subject to adjustments based on the property's performance.
- Income for QLI-impacted properties was prorated based on projected occupancy. Additional expenses for security, securing vacant units and resident case management expenditures have been added to these properties.
- Salaries are based on 1 administrative staff position per 100 units and 1 maintenance staff position per 50 units.
- 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. Utility expenditures were budgeted based upon a three-year average rate of consumption at projected utility rates.

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

- 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 FY2009, AHA will complete relocation of residents from the Martin Luther King Tower (MLK) as part of revitalization of that community. Relocation expenses for MLK are funded under the McDaniel Glenn HOPE VI revitalization grant and Replacement Housing Factor Grants and are included in the Development Budget.
- AHA will also relocate tenants from Bowen Homes, Bankhead Courts, Hollywood Courts, Thomasville Heights, Herndon Homes, Palmer House and Roosevelt House in FY2009 as part of AHA's Quality Living Initiative (QLI). Relocation and demolition expenses for these communities will be funded using MTW funds.

### Housing Choice

- **Total Housing Choice Funding.** AHA estimates it will receive approximately \$170 million in total Housing Choice funding for FY2009 supporting over 16,853 vouchers currently allocated. Also included is \$9.8 million that AHA anticipates receiving for an estimated

1,777 additional relocation vouchers related to AHA's QLI program. HUD awards these vouchers and provides funds on an incremental basis corresponding with the planned relocation schedule.

- **MTW Block Grant Funding.** AHA receives much of its Housing Choice Subsidy as part of its MTW Block Grant; the balance is received outside of the block grant. Of the projected \$170 million in total Housing Choice funding, AHA estimates that it will receive \$155 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 and is based on the estimated number of MTW Block Grant vouchers expected to be under Annual Contributions Contract (ACC) on June 30, 2008 multiplied by the 2008 MTWPUC factor. This is the methodology which AHA uses to determine its MTW Budget Utilization Benchmark.
- **Other Voucher Funding** Other Vouchers include Special Purpose Vouchers which are not eligible for the single funding flexibility under MTW and are calculated using HUD's standard formulas for 6,300 voucher unit months. The Budget for Non-MTW Vouchers also includes vouchers which AHA will receive in FY2009.
- Based on voucher increments currently approved by HUD and projection of QLI-related relocation vouchers, AHA estimates FY2009 Special Purpose Voucher non-

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

MTW funding to be \$15 million in FY09 including HAP and administration fees.

- Under AHA's MTW agreement, all voucher participants are subject to AHA's CATALYST plan regardless of the characterization of the funding of their vouchers.
- **January-June 2009 Funding.** Because HUD's Funding Year (HFY) is on a calendar year basis, the actual inflation factors and proration for the last six months of AHA's FY2009 is unknown. The FY2009 Budget uses the same funding factors for both halves of FY2009 and increases the number of non-MTW vouchers based on projected receipt of QLI-related relocation vouchers.
- **Expenditures.** The FY2009 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 FY2009 to support AHA's Project Based Rental Assistance (PBRA) Priority Activity.

- The minimum rent for Housing Choice vouchers is \$125 per month.
- When establishing Housing Choice Payment Standards, AHA will use AHA-developed localized Fair Market Standards and rent reasonableness standards as described in the CATALYST plan to further AHA's goal of ending the concentration of poverty.
- AHA projects that up to 30% of its FY2009 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 are 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 vouchers. This budget uses the current average HAP cost for 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 2008 Capital Funding Program (CFP) grant award will be about \$12.3 million after HUD completes the 2008 funding calculation. These CFP funds will be received in FY2009.

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

- 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 projects approved and begun in FY2009, and for new projects. AHA currently estimates the use of carryover CFP funds at \$3.1 million.

### 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 FY2009 AHA anticipates reimbursements totaling over \$18.7 million for HOPE VI, Replacement Housing Factor, Development Grant funds, and City of Atlanta funding. Another \$7.2 million in development funds will be provided from the MTW block grant for construction and \$2.6 related to public improvements.

Total estimated FY2009 expenditures by Revitalization Project are shown below:

Revitalization Project	FY2009 Budget
Capitol Homes	\$4,371,575
Grady Homes	11,871,672
Harris Homes	6,137,604
Perry Homes	2,926,758
McDaniel Glenn	9,330,842
Total	\$34,638,450

### Mark to Market

Congress extended the Mark to Market program until September 30, 2011. AHA is the designated Participating Administrative Entity for Georgia and is eligible to continue to earn fees based on the number of asset restructuring assignments approved by HUD's Office of Affordable Housing Preservation. AHA has been assigned 24 restructurings to date. Fees earned under this business line are unrestricted. As HUD sunsets this program, however, AHA does not expect any further assignments and this budget does not reflect Mark to Market revenues or expenses.

### 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 \$1.5 million in unrestricted income as a subcontractor of GA HAP.

The Housing Authority of the City of Atlanta, Georgia

### **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 through its involvement in revitalization partnerships. AHA estimates that it will earn \$2 million in FY2009. Although earned in FY2009, some portion of development fees will be deferred until certain milestone dates in accordance with the specific financial closing documents. From these fees AHA is required to make contributions to contractually required reserves for our mixed income properties.

The balance is restricted to use in future redevelopment efforts, some specifically designated to the area in which it was earned during the grant period that generated it.

### **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. There may be transfers of equity in FY2009, but no expenditures are anticipated. Therefore no Turnkey III expenses are identified in this budget.



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

Capital requirements of the properties have repeatedly surpassed 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 2009 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 2009. Finally, some expenditures may take place in FY 2009 resulting from projects planned for and begun in FY 2008, but completed and paid for in FY 2009.

### Planned Expenditures

Capital Projects in FY 2009	FY 2009 Budget	Property
Accessibility Issues related to the Voluntary Compliance Agreement	\$3,718,000	Barge Road Juniper and 10th Martin Street Cosby Spear Piedmont Road
Major Systems Issues such as elevator modernization, PTACS, boilers, electrical panels, sprinkler systems, plumbing and storage tanks.	\$2,141,600	Westminster Barge Road Hightower Juniper & 10th Marian Road Marietta Road Cheshire Bridge Palmer House Piedmont Road Roosevelt House Martin Street Cosby Spear East Lake Georgia Avenue
Infrastructure Repairs including sewers, drains, driveways and parking lots, retention ponds and severe erosion.	\$141,350	Cheshire Bridge Peachtree Road East Lake Georgia Ave Piedmont Road
Building Envelope Repairs including windows, painting, roof replacement, sealing, structural repairs, and lighting.	\$49,500	Peachtree Road
Dwelling Units and Common Areas	\$357,500	Cheshire Bridge Peachtree Road
Fire and Safety Issues	\$770,000	Barge Road Hightower Juniper & 10th Marietta Road
<b>Total Capital Projects</b>	<b>\$7,177,950</b>	

## **Demolition and Disposition Activities**

AHA's FY 2009 demolition and disposition activities are described in detail in Parts I and V of the FY 2009 CATALYST Implementation Plan.

**The Housing Authority of the City of Atlanta, Georgia**  
**Combined\* Statement of Revenues and Expenses**  
**For Fiscal Year Ended June 30, 2007**  
**(Unaudited)**

	<b>Annual Plan Budget</b>	<b>Restated Budget</b>	<b>Actual</b>	<b>Variance</b>	<b>% Variance</b>
<b>OPERATING REVENUES</b>					
Rental Revenue	\$ 15,684,063	\$ 17,815,756	\$ 17,282,562	\$ (533,194)	-3.0%
Low Income Operating Subsidy	28,276,411	28,301,703	27,847,320	(454,383)	-1.6%
Housing Choice Operating Subsidy	138,340,180	127,255,623	126,675,738	(579,885)	-0.5%
Capital Funds Program	9,014,196	5,776,417	6,076,768	300,351	5.2%
Development and HOPE VI Grants	8,337,469	3,000,000	3,000,000	-	0.0%
Soft Grants	259,649	1,044,718	583,224	(461,494)	-44.2%
Development and Transaction Fees	-	3,015,038	2,039,396	(975,642)	-32.4%
Other Revenue	4,289,809	7,041,495	8,197,356	1,155,861	16.4%
<b>TOTAL OPERATING REVENUES</b>	<b>\$ 204,201,777</b>	<b>\$ 193,250,750</b>	<b>\$ 191,702,364</b>	<b>\$ (1,548,386)</b>	<b>-0.8%</b>
<b>OPERATING EXPENSES</b>					
Administrative	33,247,082	37,180,557	34,905,378	2,275,179	15.1%
Housing Assistance Payments	\$ 109,264,978	\$ 88,735,190	\$ 84,812,490	\$ 3,922,700	4.4%
Resident Services	9,281,447	4,307,660	3,738,996	568,665	13.2%
Utilities	16,371,236	16,353,401	15,367,163	986,238	6.0%
Ordinary Maintenance and Operation	14,571,698	15,509,936	14,662,047	847,889	5.5%
Protective Services	5,144,494	5,914,292	5,916,121	(1,828)	0.0%
General Expenses	12,515,488	8,786,427	9,139,488	(353,061)	-4.0%
Depreciation Expense		13,983,018	13,859,575	123,443	0.9%
<b>TOTAL OPERATING EXPENSES</b>	<b>\$ 200,396,423</b>	<b>\$ 190,770,481</b>	<b>\$ 182,401,257</b>	<b>\$ 8,369,224</b>	<b>4.4%</b>
<b>NET OPERATING GAIN/(LOSS)</b>	<b>\$ 3,805,354</b>	<b>\$ 2,480,269</b>	<b>\$ 9,301,107</b>	<b>\$ 6,820,838</b>	<b>275.0%</b>
<b>NON-OPERATING REVENUES</b>					
Capital	\$ 28,486,533	\$ 8,648,418	\$ 6,181,334	\$ (2,467,084)	-28.5%
Interest Income	1,511,314	4,143,988	5,728,806	1,584,818	38.2%
Acquisitions	4,063,809				
Other sources of Funds	2,029,874				
<b>TOTAL NON-OPERATING REVENUES</b>	<b>\$ 36,091,530</b>	<b>\$ 12,792,406</b>	<b>\$ 11,910,141</b>	<b>\$ (882,265)</b>	<b>-6.9%</b>
<b>NON-OPERATING EXPENDITURES</b>					
Loss/(Gain) on Sale of Fixed Assets	\$ (510,000)	\$ 3,809,976	\$ 5,266,349	\$ (1,456,373)	
Extraordinary Maintenance and Demolition	3,086,260	2,482,509	2,928,423	(445,914)	-18.0%
Interest Expense	334,015	1,073,370	957,867	115,503	10.8%
Payment of Principal	674,196				
MTW Funds used for Development Purposes		14,000,000	12,568,289	1,431,711	10.2%
<b>TOTAL NON-OPERATING EXPENSES</b>	<b>\$ 3,584,471</b>	<b>\$ 21,365,855</b>	<b>\$ 21,720,929</b>	<b>\$ (355,074)</b>	<b>-1.7%</b>
<b>NET NON-OPERATING GAIN/(LOSS)</b>	<b>\$ 32,507,059</b>	<b>\$ (8,573,449)</b>	<b>\$ (9,810,788)</b>	<b>\$ (1,237,339)</b>	<b>14.4%</b>
<b>CHANGE IN NET ASSETS BEFORE DEVELOPMENT ACTIVITIES</b>	<b>\$ 36,312,413</b>	<b>\$ (6,093,180)</b>	<b>\$ (509,682)</b>	<b>\$ 5,583,499</b>	<b>-91.6%</b>
Change in Net Assets related to Development Activities		35,143,613	26,581,334	(8,562,279)	-24.4%
<b>CHANGE IN NET ASSETS AFTER DEVELOPMENT ACTIVITIES</b>	<b>\$ 36,312,413</b>	<b>\$ 29,050,433</b>	<b>\$ 26,071,653</b>	<b>\$ (2,978,780)</b>	<b>-10.3%</b>

\* NOTE: These figures reflect AHA's Operating budgets and funds for public housing Capital Projects. They do not include HOPE VI, Replacement Housing Factor Funds, Public Improvement funds, or other funds used in AHA's development program, which are displayed on the next page. In February 2007, the Board of Commissioners approved a Restated FY2007 Budget, which reflected changes in AHA's priorities for FY2007 to include the implementation of AHA's Quality of Life Initiative.

Variances stated above are calculated from the Restated FY2007 Budget. Favorable variances are indicated by a positive value.



# Atlanta Housing Authority Development Grants Budget

As of June 30, 2007

	<i>Total Budget</i>	<i>Actuals Thru 2006</i>	<i>Available for FY07 and later</i>	<i>FY07 Board Budget</i>	<i>FY07 Actuals</i>	<i>Available for Future Years</i>
<b>Capitol Homes Revitalization</b>						
HOPE VI Grant	\$35,000,000	\$13,958,869	\$21,041,130	\$13,423,683	\$8,862,938	\$12,178,192
Public Improvements	\$15,112,794	\$4,340,430	\$10,772,364	\$10,832,045	\$4,395,843	\$6,376,521
Other	\$6,495,375	\$0	\$6,495,375	\$0	\$760,392	\$5,734,983
<b>Total Capitol Homes</b>	<b>\$56,608,168</b>	<b>\$18,299,298</b>	<b>\$38,308,870</b>	<b>\$24,255,728</b>	<b>\$14,019,173</b>	<b>\$24,289,696</b>
<b>Grady Homes Revitalization</b>						
HOPE VI Grants	\$24,177,935	\$4,177,932	\$20,000,003	\$512,813	\$756,863	\$19,243,140
Capital Grants	\$16,998,127	\$1,574,372	\$15,423,755	\$2,559,029	\$1,004,055	\$14,419,700
Other	\$9,148,786	\$279,748	\$8,869,038	\$1,912,069	\$3,448,018	\$5,421,020
<b>Total Grady Homes</b>	<b>\$50,324,848</b>	<b>\$6,032,052</b>	<b>\$44,292,796</b>	<b>\$4,983,911</b>	<b>\$5,208,937</b>	<b>\$39,083,859</b>
<b>Techwood/Clark Howell Revitalization</b>						
Public Improvements	\$2,847,782	\$357,141	\$2,490,641	\$2,490,641	\$436,431	\$2,054,210
Other	\$698,000	\$200,000	\$498,000	\$879,000	\$250,000	\$248,000
<b>Total Techwood/Clark Howell</b>	<b>\$3,545,782</b>	<b>\$557,141</b>	<b>\$2,988,641</b>	<b>\$3,369,641</b>	<b>\$686,431</b>	<b>\$2,302,210</b>
<b>Carver Homes Revitalization</b>						
HOPE VI Grants	\$44,389,920	\$33,147,507	\$11,242,413	\$13,418,517	\$9,157,849	\$2,084,564
Public Improvements	\$12,117,396	\$10,332,138	\$1,785,258	\$1,785,258	\$1,785,258	\$0
Other	\$14,364,955	\$1,576,779	\$12,788,176	\$0	\$2,265,983	\$10,522,193
<b>Total Carver Homes</b>	<b>\$70,872,271</b>	<b>\$45,056,424</b>	<b>\$25,815,847</b>	<b>\$15,203,775</b>	<b>\$13,209,090</b>	<b>\$12,606,758</b>
<b>Harris Homes Revitalization</b>						
HOPE VI Grants	\$39,254,450	\$18,874,165	\$20,380,285	\$3,690,625	\$3,131,555	\$17,248,730
Public Improvements	\$10,230,185	\$7,606,860	\$2,623,325	\$2,463,846	(\$121,529)	\$2,744,855
Other	\$8,886,767	\$984,547	\$7,902,220	\$1,094,496	\$691,348	\$7,210,873
<b>Total Harris Homes</b>	<b>\$58,371,402</b>	<b>\$27,465,572</b>	<b>\$30,905,830</b>	<b>\$7,248,966</b>	<b>\$3,701,373</b>	<b>\$27,204,457</b>
<b>Perry Homes Revitalization</b>						
HOPE VI Grants	\$25,135,500	\$22,415,717	\$2,719,782	\$2,744,282	\$2,719,782	\$0
Public Improvements	\$3,900,000	\$105,115	\$3,794,885	\$3,794,885	\$0	\$0
Capital Grants	\$20,047,986	\$17,687,380	\$2,360,606	\$2,641,038	\$2,360,606	\$0
Other	\$8,925,128	\$2,172,051	\$6,753,077	\$770,000	\$1,436,364	\$5,316,713
<b>Total Perry Homes</b>	<b>\$58,008,614</b>	<b>\$42,380,264</b>	<b>\$15,628,350</b>	<b>\$9,950,205</b>	<b>\$6,516,752</b>	<b>\$9,111,599</b>
<b>McDaniel Glenn Revitalization</b>						
HOPE VI Grants	\$20,600,000	\$5,773,692	\$14,826,308	\$10,095,668	\$2,049,958	\$12,776,350
Public Improvements	\$6,258,645	\$0	\$6,258,645	\$0	\$0	\$0
Capital Grants	\$16,467,743	\$0	\$16,467,743	\$314,532	\$266,000	\$16,201,743
Other	\$11,008,114	\$50,139	\$10,957,975	\$9,490,658	\$8,775,123	\$2,182,851
<b>Total McDaniel Glenn</b>	<b>\$54,334,501</b>	<b>\$5,823,831</b>	<b>\$48,510,671</b>	<b>\$19,900,858</b>	<b>\$11,091,082</b>	<b>\$37,419,589</b>
<b>Grand Total All Revitalization Projects</b>	<b>\$352,065,586</b>	<b>\$145,614,581</b>	<b>\$206,451,006</b>	<b>\$84,913,086</b>	<b>\$54,432,837</b>	<b>\$152,018,168</b>

**NOTE:** This schedule reflects all sources of funding for AHA's revitalization program that flow through AHA. Only expenditures that affect AHA's net assets are included in the schedule on the preceding page.

## FY 2007 BUDGET EXPLANATION

The following explanations are provided for the variances in the Combined Statement for Revenues and Expenses that are greater than \$1 million or ten percent of the budgeted amounts.

### OPERATING REVENUES

- **Development and Transaction Fees** (Variance of \$975,642 or 32.4%) Transaction Fees related to Grady Phase II amounting to \$495,253 was not recognized in FY07 because the financial closing was rescheduled until FY08; the transaction fees will be recorded at that time. The balance of the variance is due to a timing difference of recognizing developer fees. Due to a change in accounting policy, developer fees, which are contingent in nature, are now recognized when received while the budget was based on recognizing the fee income at the time of financial closing.
- **Other Revenue** (Variance of \$1.2 million or 16.4%) Unbudgeted Other Revenue of \$630,506 was recognized from forfeited funds from the Housing Choice Family Self Sufficiency escrow accounts that AHA had previously funded. Also, AHA received \$264,396 from revenue sharing on the sale of single family homes at communities undergoing revitalization which was not anticipated in the Restated Budget.

### OPERATING EXPENDITURES

- **Housing Assistance Payments (HAP)** (Variance of \$3,922,700 or 4.4) The variance was primarily due to a change in the implementation schedule of the Quality of Life Initiative (QLI); therefore, the number of Housing Choice Vouchers that were to be used for relocated residents has been delayed until FY2008.
- **Resident Services (Relocation)** (Variance of \$568,665 or 13.2%) This variance was also due to a change in the implementation schedule of QLI. The resident relocation is deferred until FY2008.

### NON-OPERATING REVENUES

- **Capital** (Variance of \$2.5 million or 28.5%) The majority of the variance reflects delays in capital improvement work begun in FY2007, which will be completed in FY2008. The balance of the variance reflects multi-year Capital Funding Program funds available for projects that were deferred until F2008.
- **Interest Income** (Variance of \$1.5 million or 38.2%) The variance primarily reflects higher bank balances and investments with higher rates of return than anticipated in the budget.

## **NON-OPERATING EXPENDITURES**

- **Gain or Loss on Sale of Fixed Assets** (Variance of \$1.5 million or 38.2%) The variance primarily reflects the write off of the book value of assets related to prior year demolitions and dispositions which were not included in the Revised Budget.
- **Extraordinary Maintenance and Demolition** (Variance of \$445,994 or 10.8%) Some items originally budgeted within the Capital Projects budget were expensed as extraordinary maintenance.
- **MTW Funds used for Development Purposes** (Variance of \$1.3 million or 10.2%) AHA's Board of Commissioners authorized the use of up to \$14 million in MTW funds to make acquisitions and bridge loans to support AHA revitalization program in accordance with AHA's MTW Agreement. Only \$12.6 million was required because certain bridge loans were not fully utilized by June 30, 2007.

## **CHANGES IN NET ASSETS FROM DEVELOPMENT GRANT ACTIVITIES**

- **Variance of \$13.5 million** (38.5%) AHA's revitalization program is subject to a variety of external influences which result in changes in development schedules. Such changes delayed forecasted construction of new phases at Capitol Homes and McDaniel Glenn, as well as ongoing construction at other sites. Such expenditures and the resulting increase in net assets have been deferred to FY08.

*Atlanta Housing Authority*  
**MTW IMPLEMENTATION PROTOCOLS**

**Table of Contents**

***Adopted MTW Implementation Protocols***

▪ ACC Waiver.....	1
▪ Alternate Resident Survey .....	3
▪ Fee for Service Methodology .....	4
▪ Identity of Interest.....	7
▪ MTW Mixed-Finance Closing Procedures.....	27
▪ Program Flexibility for Special Purpose Vouchers.....	44
▪ Revision of MTW Benchmarks.....	45
▪ Use of MTW Funds.....	54

***Submitted and Pending Approval Protocols***

▪ Designation of Senior and Disabled Public Housing Developments .....	61
▪ HOPE VI and Other HUD-Funded Master Planned on and off-site Developments Site and Neighborhood Standards .....	72
▪ Replacement Housing Factor – Obligation and Expenditure.....	74
▪ Project Based Rental Assistance Developer Selection Criteria .....	80
▪ HUD Funding Availability .....	83

***New Protocols to be Submitted for Review and Approval***

▪ Disposition of Public Housing Operating Subsidy in AHA- Sponsored Mixed-Finance Communities Protocol.....	86
▪ Disposition of Public Housing Operating Subsidy in AHA-Owned Affordable Communities Protocol .....	91



**THE HOUSING AUTHORITY OF THE CITY OF ATLANTA, GEORGIA (AHA)**  
**MTW AGREEMENT**  
**ANNUAL CONTRIBUTIONS CONTRACT WAIVER PROTOCOL**  
**April 27, 2004**

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 AHA's Moving to Work (MTW) program, the terms and conditions for the Annual Contributions Contract (ACC) are amended for the effective period of its MTW Agreement so as not to conflict with any relief granted to AHA under its MTW Agreement.

***MTW Agreement Reference***

In accordance with the provision of the MTW Agreement Article I – HUD Program Requirements and Other Federal Requirements; Appendix A – Statement of Authorizations; Attachment A Calculation of Subsidies; Attachment B – MTW Annual Plan and Report Elements; and Attachment E – AHA MTW Program Compliance Requirements, AHA has the flexibility to amend the execution of ACC's during the MTW Agreement period.

**Program Flexibility for ACC Waiver**

In e-mails dated April 27, and May 7, 2004 respectively from Gene Geritz, AHA received approval, via Sharon Pitts in the Office of General Counsel regarding the ACC Waiver based on the following language:

“The PHA and HUD are parties to the Moving to Work Demonstration Agreement, effective July 1, 2003 through June 30, 2010 (the “MTW Agreement”). **For the effective period of the MTW Agreement only**, the terms and conditions of the ACC(s) is (are) amended to the extent that such terms and conditions conflict with the terms and conditions in the following sections of the MTW Agreement: (i) Article I- HUD Program Requirements and Other Federal Requirements, (ii) Appendix A – Statement of Authorizations, (iii) Attachment A – Calculation of Subsidies, (iv) Attachment B – MTW Annual Plan and Report Elements, and (v) Attachment E – AHA MTW Program Compliance Requirements.”

Further, guidance was provided to AHA to attach the waiver to the various ACCs as are executed up until June 30, 2010 as well as to the CFP ACCs that were executed earlier in 2004.

#### **HUD Review**

As referenced above, HUD approved AHA's use of the ACC Waiver per the April 27, 2004 and May 7, 2004 e-mails to Gloria Green (AHA's General Counsel) from AHA's HUD-appointed MTW Liaison, Eugene Geritz via Sharon Pitts in the OGC.

**THE HOUSING AUTHORITY OF THE CITY OF ATLANTA, GEORGIA (AHA)**  
**MTW AGREEMENT**  
**ALTERNATE RESIDENT SURVEY PROTOCOL**  
**February 4, 2005**

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 1<sup>st</sup> 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**  
**FEE FOR SERVICE METHODOLOGY PROTOCOL**  
**September 23, 2005**

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.

**THE HOUSING AUTHORITY OF THE CITY OF ATLANTA, GEORGIA**  
**MTW AGREEMENT**  
**IDENTITY OF INTEREST IMPLEMENTATION 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 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.

***MTW AGREEMENT REFERENCE***

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.

**SAMPLE**  
**CERTIFICATION PURSUANT TO**  
**MTW AGREEMENT IDENTITY OF INTEREST PROTOCOL**

Pursuant to the provisions of the Moving to Work Demonstration Agreement between the United States Department of Housing and Urban Development (HUD) and The Housing Authority of the City of Atlanta, Georgia, (AHA), effective July 1, 2003 (MTW Agreement), I certify that prior to AHA's concurrence with the \_\_\_\_\_ (\_\_\_\_\_) serving as general contractor for the construction work for \_\_\_\_\_ Phase \_\_\_\_ that items one through six of the Identity of Interest Implementation Protocol created under the auspices of the MTW Agreement were followed in accordance with the terms of that Protocol.

AHA procured \_\_\_\_\_ (Developer), whose sole members are \_\_\_\_\_, as the Developer for the revitalization of \_\_\_\_\_. \_\_\_\_\_, is an affiliate of the Developer and will serve as general contractor for the construction of \_\_\_\_\_.

This certification is based on the supporting documentation attached hereto, which are identified in the Protocol.

\_\_\_\_\_  
Renée Lewis Glover  
President and Chief Executive Officer  
The Housing Authority of the City of Atlanta, Georgia

\_\_\_\_\_  
Date

**SAMPLE**



## Interoffice Memorandum

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

**DATE:** \_\_\_\_\_

**TO:** Renée Lewis Glover

**CC:**

**FROM:** \_\_\_\_\_

**SUBJECT: Waiver of 24 CFR 941.606(n)(1)(ii)(B)**

\_\_\_\_\_

This \_\_\_\_\_ responds to the letter, \_\_\_\_\_ from \_\_\_\_\_, requesting a waiver of 24 CFR 941.606(n)(1)(ii)(B) of the HUD mixed-finance regulation for Phase \_\_\_\_ of \_\_\_\_\_, now known as \_\_\_\_\_. I have completed my review of the request and all pertinent documentation supporting this request for a waiver. Please be advised that I am recommending that by the authority granted to The Housing Authority of the City of Atlanta (AHA), through the MTW Demonstration Agreement (effective July 1, 2003), and consistent with the Identity of Interest Protocol provisions contained therein, I approve the developer's request for a waiver to have an affiliate of the development partners serve as general contractor for construction work associated with \_\_\_\_\_ Phase \_\_\_\_\_. Consistent with the aforementioned HUD

## SAMPLE

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provisions, the MTW Protocol requires that if the development partner and/or owner entity (or any other entity with an identity of interest with such parties) wants to serve as the general contractor for the project or development, it may award itself the construction contract only if it can demonstrate to AHA's satisfaction that its' bid would be the lowest responsible bid submitted in response to a public request for bids.

AHA procured \_\_\_\_\_ (Developer), whose sole members are \_\_\_\_\_, as the Developer for the revitalization of \_\_\_\_\_. The new \_\_\_\_\_ is a master-planned, mixed-income, revitalized community with \_\_\_\_ percent of its residential units reserved for public housing.

A waiver to 24 CFR 941.606(n)(1)(ii)(B) is requested so that an affiliate of \_\_\_\_\_, whose members are affiliates of the Developer, may serve as the general contractor for Phase \_\_\_\_\_. \_\_\_\_\_ did not bid to become the general contractor, as specified by this provision of the mixed-finance regulation, but Integral has demonstrated that the construction costs are reasonable and are within HUD requirements. In its letter of \_\_\_\_\_, \_\_\_\_\_ provided a good cause basis to waive 24 CFR 941.606 (n)(1)(ii)(B) in order to accomplish the mixed-finance development of \_\_\_\_ rental units as outlined below.

Because the Atlanta market is extremely competitive and very busy, area contractors are commonly under contract with a significant amount of work for numerous clients, and many contractors lack the necessary familiarity of Davis Bacon and Section 3 requirements which presents an unacceptable level of risk for the Developer. The Developer must meet construction completion and occupancy stabilization dates imposed by tax credit regulations. A public bid



## SAMPLE

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process would take an excessive amount of time, thereby pushing the Phase \_\_\_ closing date back for several months, and pose serious impediments in the way of obtaining the required construction schedule. The early involvement of an affiliate of \_\_\_\_\_ as the general contractor will allow the Developer to meet its timing requirements. The Developer is building tax credit units and market rate units, in addition to the public housing units, and as a consequence, is interested in getting the best return on its investment and in building a high quality project and economically competitive development as demanded by the market.

Moreover, our review included a comparison of the Developer's final construction budget and an independent third party cost estimate dated \_\_\_\_\_. In addition, AHA utilized a construction estimating consultant for the review. \_\_\_\_\_ final construction budget of \$\_\_\_\_\_ and the independent third party cost estimate of \$\_\_\_\_\_ are within a reasonable range (\_% variance). The final construction budget is consistent with the Exhibit Fs submitted for this project.

Therefore based on the aforementioned factors, and pursuant to 24 CFR 5.110, and by the authority vested in AHA through the MTW Demonstration Agreement and the Identity of Interest Protocol, I have determined that good cause exists to allow an affiliate \_\_\_\_\_ to serve as the general contractor, and hereby recommend waiver of 24 CFR 941.606(n)(1)(ii)(B) for \_\_\_\_\_ Phase \_\_\_\_.



# INTEROFFICE MEMO

**TO:** Danita Brown  
James Talley

**DATE:** June 11, 2007

**FROM:** David Jacoppo *df*

**RE:** Auburn Pointe Phase II Residential Construction Estimate

**CC:** Tom Hoenstine

I evaluated the Grady Redevelopment, LLC residential construction budget against the HUD Cost Control and Safe Harbor Standards.

I also compared the Grady Redevelopment, LLC residential construction budget to the Grady Senior Apartments residential construction cost estimate prepared by Mr. Denny C. Broadwell (an independent third party construction estimator).

Based on my review and analysis, the Grady Redevelopment, LLC residential construction budget is reasonable.

The fees in the Grady Redevelopment, LLC residential 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). Note: For this Identity of Interest waiver request, Builders Profit is not applicable.

The below table compares HUD's Cost Control and Safe Harbor Standards to the Grady Redevelopment, LLC residential construction budget.

Criteria	Safe Harbor Standard	Grady Redevelopment, LLC Budget
General Conditions – 6 Percent	\$483,805.00	\$483,805.00 (Meets HUD Standard)
Builders Profit – 6 Percent	N/A	N/A
Builders Overhead – 2 Percent	\$161,268.00	\$161,268.00 (Meets HUD Standard)

The following additional information is provided:

Denny C. Broadwell Cost Estimate: \$8,885,027.00

Grady Redevelopment, LLC Budget: \$8,830,842.00

The Grady Redevelopment, LLC Budget is lower than the independent cost estimate in the amount of \$54,185.00.

Please call me at extension 7356 if you have any questions.

**REAL ESTATE MANAGEMENT**

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**Grady Redevelopment Partnership I, LP***60 Piedmont Avenue, 1<sup>st</sup> Floor, Atlanta, Georgia 30303**(404) 224-1860 Phone / (404) 224-1899 Fax*

June 8, 2007

Ms. Joy Fitzgerald  
 Senior Vice President  
 Real Estate Development and Acquisition Department  
 Atlanta Housing Authority  
 230 John Wesley Dobbs Avenue, N.E.  
 Atlanta, GA 30303

RE: **Auburn Pointe – Phase II  
 Building Construction**  
 Waiver of 24 CFR § 941.606(n)(1)(ii)(B)  
 HOPE VI Grant : GA06URD0061105

Dear Ms. Fitzgerald:

This is a request for a waiver of 24 CFR § 941.606(n)(1)(ii)(B) of the U.S. Department of Housing and Urban Development ("HUD") mixed finance regulations relating to the site remedial work associated with Phase II (Independent Senior Rental) of Auburn Pointe. Auburn Pointe is the new master-planned, mixed-use, mixed-income community being developed on the site of the former Grady Homes. Section 941.606(n)(1)(ii)(B) requires that if the development partner and/or owner entity (or any other entity with an identity of interest with such parties) wants to serve as the general contractor for the project or development, it may award itself the construction contract only if it can demonstrate to HUD's satisfaction that its bid is the lowest bid submitted in response to a public request for bids.

The Housing Authority of the City of Atlanta, Georgia ("AHA") competitively procured Grady Redevelopment, LLC, a joint venture between Integral Properties, LLC and Urban Realty Partners, LLC, as its development partner to revitalize the Grady Homes community.

Phase II of the master plan is a 124-unit mixed-income senior building. Completion is scheduled on or before December 31, 2008. IBG Construction Services, LLC, an affiliate of Integral Properties, LLC (Integral), will serve as the general contractor. It has been our experience that this approach is highly effective. As with other mixed-finance developments, the owner entity has been able to maintain the highest quality workmanship with the lowest cost and have ensured that many phases have been timely completed using a similar structure.

**Ms. Joy Fitzgerald**

June 8, 2007

- 2 -

In reviewing this request for a waiver to permit an Integral affiliate to serve as the general contractor for the on-site construction associated with Phase II of the Grady Homes redevelopment, please consider the following:

1. The local market is extremely busy and contractors generally have a substantial amount of work and clients to manage. In this environment, this presents an unacceptably high risk to developers that are bound by required construction completion and stabilization dates imposed by tax credit regulations. Furthermore, many contractors active in this market lack familiarity and comfort with Davis Bacon and Section 3 requirements. They also express concern about complexities and delays associated with funding the draw process when multiple sources of public and private funds are involved.
2. As is common with HOPE VI revitalization developments, the grant funds are being combined with HUD §221(d)(4) loan proceeds and 9% Low Income Housing Tax Credit investment equity. There are substantial due diligence activities required from the general contractor for all of these development funding sources. The local market does not have many contractors that are familiar with these requirements and that are able to provide the necessary due diligence in a timely manner. In order to meet the Phase II schedule, the construction must begin at least by July 2007. The general contractor must be committed and the construction contract signed prior to the start of work. Therefore, time is of the essence and a public request for bids and subsequent review and negotiation with a successful bidder will take approximately 60 or more days to implement. We fear that it would be impossible to both procure another contractor, and have that contractor complete their pricing exercise in time to accommodate this schedule. We have obtained the building permits, and the contractor is mobilizing for remedial site work and will be ready to begin onsite construction as soon as closing occurs.
3. Phase II includes market rate, tax credit and public housing assisted units. As such, the development partner is interested in getting the best return on its investment and building a high quality project and economically competitive development as demanded by the market. Having an Integral affiliate serve as the general contractor will facilitate obtaining these goals. Moreover, there is no economic or other incentive for an affiliated builder to drive up the costs. Any cost overruns are borne by the developer and if substantial, typically result in deferred developer fees or other financial costs borne by the private developer. Given this potential exposure, it is prudent for our development partner to manage such exposure by having an affiliated entity build the job. This is the preferred practice in the private sector.

**Ms. Joy Fitzgerald**

June 8, 2007

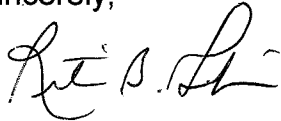
- 3 -

4. AHA will closely review cost estimates to ensure that the overhead and profit line items in the site remediation contract do not exceed those included in other "arms length" construction and/or site remediation contracts with which we are familiar.

In accordance with the procedure previously accepted by HUD in similar waiver requests AHA has made in the past, enclosed please find as Attachment A an independent cost certification executed by Denny C. Broadwell., a non-affiliated construction consulting cost analyst that conducted an estimate of the construction work associated with Phase II. That cost estimate is \$8,885,027. The final budget that will be made part of the general contractor's contract is attached as Attachment B and is in the amount of \$8,830,842. The final budget is lower by \$54,185 than the independent cost estimate. The evidence fully establishes that the construction contract between Grady Redevelopment Partnership I, LP and the Integral affiliate in the amount of \$8,830,842 is a reasonable cost for the Atlanta market.

Please contact Ms. Rita Gibson, Senior Development Director, at (404) 224-1887 if there is any additional information that you need to process this waiver request.

Sincerely,



Rita B. Gibson  
Senior Development Director

cc: Vicki Lundy Wilbon (Grady Redevelopment Partnership I, LP)  
Danita Brown (AHA)  
Mike Wilson, (AHA)  
William James Talley, Jr. (AHA)  
File

Attachments A and B




# Interoffice Memorandum

The Housing Authority of the City of Atlanta, Georgia

**DATE:** 04 September 2007

**TO:** Renée Lewis Glover

**CC:** File

**FROM:** Joy Fitzgerald 

**SUBJECT:** Auburn Pointe Phase II Vertical Construction  
Waiver of 24 CFR 941.606(n)(1)(ii)(B)

This responds to the letter, dated June 8, 2006 from Grady Redevelopment Partnership I, LP, requesting a waiver of 24 CFR 941.606(n)(1)(ii)(B) of the HUD mixed-finance regulation for Phase II of Grady Homes, now known as Auburn Pointe. I have completed my review of the request and all pertinent documentation supporting this request for a waiver. Please be advised that I am recommending that by the authority granted to The Housing Authority of the City of Atlanta (AHA), through the MTW Demonstration Agreement (effective July 1, 2003), and consistent with the subsequent Identity of Interest Protocol provisions, I approve the developer's request for a waiver to have an affiliate of a member of the development partnership serve as general contractor for Auburn Pointe Phase II vertical construction work. Consistent with the aforementioned HUD provisions, the MTW Protocol requires that if the partner and/or owner entity (or any other entity with an identity of interest with such parties) wants to serve as the general contractor for the project or development, it may award itself the construction contract only if it can demonstrate to AHA's satisfaction that its bid would be the lowest responsible bid submitted in response to a public request for bids.

AHA procured Grady Redevelopment, LLC (Developer), whose sole members are Integral Properties LLC (f/k/a The Integral Group, L.L.C.) and Urban Realty Partners-Grady Redevelopment, LLC as the Developer for the revitalization of Grady Homes. The new Grady Homes is a master-planned, mixed-income, revitalized community with 33 percent of its residential units reserved for public housing.

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Grady: Phase II: IOI Waiver  
Page 2  
September 4, 2007

A waiver to 24 CFR 941.606(n)(1)(ii)(B) is requested so that an affiliate of Integral Properties LLC, whose members are affiliates of the Developer, may serve as the general contractor for Phase II. The affiliate of Integral Properties LLC proposed to perform the construction work is Integral Building Group (IBG). The Developer did not bid to become the general contractor, as specified by this provision of the mixed-finance regulation, but Integral has provided a demonstration that the construction costs are reasonable and are within HUD requirements. In its letter of June 8, 2007, Grady Redevelopment Partnership I, LP provided a good cause basis to waive 24 CFR 941.606 (n)(1)(ii)(B) in order to accomplish the mixed-finance development of 124 rental units as outlined below.

Because the Atlanta market is extremely competitive and very busy, area contractors are commonly under contract with a significant amount of work for numerous clients, and many contractors lack the necessary familiarity of Davis Bacon and Section 3 requirements; an unacceptable level of risk is presented for the Developer. The Developer must meet construction completion and occupancy stabilization dates imposed by tax credit regulations. A public bid process would take an excessive amount of time, thereby pushing the Phase II closing date back for several months, and pose serious impediments in the way of obtaining the required construction schedule. The early involvement of an affiliate of Integral Properties LLC as the contractor will allow the development partnership to meet its timing requirements. The Developer is building tax credit units and market rate units, in addition to the public housing units, and as a consequence, is interested in getting the best return on its investment and in building a high quality project and economically competitive development as demanded by the market.

AHA's review included a comparison of IBG's final construction cost breakdown to be attached to the construction contract (to be included in the evidentiaries for Phase II) and an independent third party cost estimate, prepared by Denny C. Broadwell a non-affiliated construction consultant cost analyst, dated April 18, 2007. In his report, Broadwell determined that Integral Building Group's construction cost breakdown was reasonable. Additionally, AHA utilized a construction estimating consultant, David Jacoppo of Draper & Associates, to review both Integral Building Group's construction cost breakdown of \$8,830,842 and the independent third party construction cost estimate of \$8,885,027, and he determined that both the construction cost breakdown and the construction cost estimate were within a reasonable range (with less than 1% variance). Moreover, the final construction cost breakdown is consistent with the Exhibit Fs submitted for this phase of construction as part of the evidentiaries. A copy of the cost breakdown and a copy of the third party estimate are attached as Exhibits A & B.

Therefore based on the aforementioned factors, and pursuant to 24 CFR 5.110, and by the authority vested in AHA through the MTW Demonstration Agreement, and more specifically associated with the Identity of Interest Protocol, I have determined that good cause exists to allow an affiliate Integral Properties LLC to serve as the general contractor, and hereby recommend waiver of 24 CFR 941.606(n)(1)(ii)(B) for Grady Homes Phase II.



**Exhibit A**  
**Denny C. Broadwell**  
**(Independent Third Party Consultant Estimate)**

FHA FORM NO. 2331-B  
(1/75)U. S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT  
FEDERAL HOUSING ADMINISTRATIONFORM 2328 AND COST CERTIFICATION REVIEW WORKSHEET  
COST SECTIONPROJECT NAME: THE VERANDA AT AUBURN POINTE  
PROJECT NUMBER: 061-36542☒ FIRM  
CERTIFICATION

TRADE ITEM	Column A Form 2326 Dollar Amounts	Column B Form 2328/or Certified Dollar Amounts	Column C Plus or Minus Dollar Amounts Variance	Column D Plus or Minus Percentages Variance
1. Concrete	497,131	476,420	-20,711	-4.2
2. Masonry	492,962	485,252	-7,710	-1.6
3. Metals	109,166	109,166	0	0
4. Rough Carpentry	1,872,940	1,839,901	-33,039	-1.8
5. Finish Carpentry	316,380	327,794	+11,414	+3.6
6. Waterproofing	23,270	24,543	+1,273	+5.5
7. Insulation	70,138	70,770	+632	+1
8. Roofing	90,725	89,230	-1,495	-1.6
9. Sheet Metal	38,299	38,381	+82	+0
10. Doors	160,500	159,172	-1,328	-1
11. Windows	56,580	53,668	-2,912	-5.1
12. Glass	0	0	0	0
13. Lath and Plaster	0	0	0	0
14. Drywall	0	0	0	0
15. Tile Work	537,846	515,058	-22,788	-4.2
16. Acoustical	31,847	31,450	-397	-1.2
17. Wood Flooring	0	0	0	0
18. Resilient Flooring	21,405	21,405	0	0
19. Painting and Decorating	32,842	33,504	+662	+2
20. Specialties	253,104	263,004	+9,900	+3.9
21. Special Equipment	75,150	74,504	-646	-1
22. Cabinets	95,640	96,726	+1,086	+1.1
23. Appliances	223,280	266,530	+43,250	+19
24. Blinds, Shades and Artwork	189,100	191,640	+2,540	+1.3
25. Carpets	12,300	11,920	-380	-3
26. Special Construction	114,191	116,843	+2,652	+2.3
27. Elevators	39,072	130,345	+91,273	+233
28. Plumbing and Hot Water	20,000	120,275	+100,275	+501
29. Heat and Ventilation - RADON VENT	474,576	458,275	-16,301	-3.4
30. Air Conditioning	47,118	49,137	+2,019	+4.3
31. Electrical	588,461	577,857	-10,604	-1.8
32. SUBTOTAL (Structures)	809,933	801,964	-7,969	-1
33. Accessory Structures	7,494,476	7,456,794	-37,682	-0.5
34. TOTAL (Structures)	0	0	0	0
35. Earthwork	7,494,476	7,456,794	-37,682	-0.5
36. Site Utilities	43,447	42,994	-453	-1
37. Roads and Walks	177,849	186,522	+8,673	+4.9
38. Site Improvements	118,933	13,385	-105,548	-88.7
39. Lawns and Planting	115,960	14,470	-101,490	-87.5
40. Unusual Site Conditions	153,731	149,250	-4,481	-2.9
41. TOTAL (Land Improvements)	0	0	0	0
42. General Requirements	609,920	606,621	-3,299	-0.5
43. General Overhead	486,264	483,805	-2,459	-0.5
44. Builder's Profit	171,813	161,268	-10,545	-6.1
45. Arch. Fee (Prior to Construction)	BSPRA	BSPRA	0	0
46. Arch. Fee (During Construction)	0	0	0	0
47. Other Fees	0	0	0	0
48. Bond Premium	20,260	20,260	0	0
49. Misc. (Labor and Materials)	102,294	102,294	0	0
50. TOTAL COST	8,885,027	8,830,842	-54,185	-0.6
51.				
52.				

Justification for Acceptance:

NO FRONT END LOADING APPARENT

COST VARIANCE IS \$54,185 OR LESS THAN 1%

COST PERCENTAGES IN COLUMN D ARE ALL  
WITHIN ACCEPTABLE PARAMETERS

"RECOMMEND ACCEPTANCE OF CONTRACTORS COST"

Danyel Broedel  
(Processing Analyst)

18 April 07

(Chief, Cost Branch or Cost Analyst)

(Date)

U.S. G.P.O. 1977-288-888/874. REASON NO. 4

**Exhibit B**  
**Integral Building Group**  
**Construction Cost Breakdown**

Form HUD-2328 (5/95)  
ref. Handbook 4450.1 & 4460.1

U.S. Department of Housing and Urban Development  
Federal Housing Administration

03/30/07

## CONTRACTOR'S and/or MORTGAGOR'S

Date: 3/30/2007	COST BREAKDOWN (Schedule of Values)	Project No. 061-35648-PM-SR
Sponsor:		Building Identification: Project Summary
Name of Project: <b>The Veranda at Auburn Pointe</b>	Location:	155 Hilliard Street, SE Atlanta, Georgia 30312

This form represents the contractor's and/or mortgagor's firm costs and services as a basis for disbursing dollar amounts when insured advances are requested.

Detailed instructions for completing this form are included on the reverse side.

LINE	DIV	TRADE ITEM	COST	TRADE DESCRIPTION (Labor & Material Included)			
1	3	Concrete	476,420	Foundation Wall, Soil Treatment, Building Concrete, Lightweight Concrete & Gyp-crete			
2	4	Masonry	483,252	Brick & Stone Veneer, CMU Walls, Mortar & Reinforcing			
3	5	Metals	109,166	Structural Columns & Beams, Misc. Steel, Stairs & Railings			
4	6	Rough Carpentry	1,839,901	Rough Framing Labor & Materials, Pre-Engineered Truss Systems, Exterior Sheathing & Siding			
5	6	Finish Carpentry	327,794	Interior Trim Labor & Materials, Interior Wood Stairs			
6	7	Waterproofing	24,543	Building Foundation Wall & Exterior Openings			
7	7	Insulation	70,770	Batt & Blown Insulation, Sealants (Fire Caulk)			
8	7	Roofing	89,230	Roofing Shingle Materials, Standing Seam & Installation			
9	7	Sheet Metal	38,381	Misc. Flashings, Gutters & Downspouts			
10	8	Doors	159,172	Exterior & Interior Doors and Hardware			
11	8	Windows	55,668	Insulated Single Hung Aluminum			
12	8	Glass	-	reference Line 11			
13	9	Lath & Plaster	-	Not Applicable			
14	9	Drywall	575,058	Sheetrock Material & Installation			
15	9	Tilework	31,450	Ceramic Tile Surrounds & Flooring			
16	9	Acoustical	-	Not Applicable			
17	9	Wood Flooring	21,405	Select Common Area Flooring			
18	9	Resilient Flooring	33,504	Vinyl Composition Tile			
19	9	Painting & Decorating	263,064	Interior & Exterior Painting, Final Clean			
20	10	Specialties	74,504	Bath Hardware, Mirrors, Vinyl Shelving & Unit Signage			
21	11	Special Equipment	96,726	Fire Extinguishers & Postal Equipment (Mailboxes), Visitor Call Box System			
22	11	Cabinets	226,530	Kitchen & Vanity Cabinets and Laminated Countertops			
23	11	Appliances	191,640	Residential Grade Appliances - HC Range, Refrigerator, Dishwasher, Disposal & Ventilation Hood			
24	12	Blinds & Shades, Artwork	11,920	Interior Horizontal Vinyl Window Blinds			
25	12	Carpets	116,843	Minimum FHA Carpet & Pad			
26	13	Special Construction	130,345	NFPA-13R Fire Sprinkler System			
27	14	Elevators	120,275	Hydraulic Elevators			
28	15	Plumbing & Hot Water	458,275	Building Plumbing & Fixtures			
29	15	Heat & Ventilation	49,137	Radon Ventilation System			
30	15	Air Conditioning	577,857	Complete HVAC System			
31	16	Electrical	801,964	Unit Electrical Service & Fixtures, Fire Alarm, Premise Intrusion Security, Phone & Cable Service			
32		SUBTOTAL (Structures)	7,456,794				
33		Accessory Structures		Not Applicable			
34		TOTAL (lines 32 & 33)	7,456,794				
35	2	Earthwork	42,994	reference HUD Form 2328-L1 (Adjusted w/ Remedial Sitework Agreement)			
36	2	Site Utilities	186,522	reference HUD Form 2328-L1 (See Offsite Costs)			
37	2	Roads & Walks	113,385	reference HUD Form 2328-L1 (See Offsite Costs)			
38	2	Site Improvements	114,470	reference HUD Form 2328-L1			
39	2	Lawns & Planting	149,250	reference HUD Form 2328-L1			
40	2	Unusual Site Conditions	-	reference Remedial Sitework Agreement			
41		TOTAL LAND IMPROVEMENTS	606,621				
42		TOTAL LAND IMPRVMTS & STRUCTS.	8,063,415	NonResidential/Spec. Ext. Land Imprvmt		Offsite Costs	
43	1	General Requirements (6% of Line 42)	483,805	(Cost Included in Trade Item Breakdown)		(Cost Not Included in Trade Item Breakdown)	
44		SUBTOTAL (Lines 41 & 42)	8,547,220	Description	Est Cost	Description	Est Cost
45		Builder's Overhead (2% of Line 42)	161,268				
46		Builder's Profit					
47		SUBTOTAL (Lines 44 thru 46)	8,708,488	Total		Total	
48				Other Fees		Demolition	
49		Other Fees	20,260	(Cost Included in Trade Item Breakdown)		(Cost Not Included in Trade Item Breakdown)	
50		Bond Premium (Subcontractor & Payment/Performance)	102,094	Description	Est Cost	Description	Est Cost
51		TOTAL ALL IMPROVEMENTS	8,830,842	Building Permit	NIC - By Owner		
52		Builder's Profit Paid by Means Other Than Cash		Final Survey	7,760		
53				Cost Certification	12,500		
54		TOTAL ALL IMPROVEMENTS (less Line 52)	8,830,842	Total		Total	

I hereby certify that all the information stated herein, as well as any information provided in the accompanying heretofore, 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. 2001, 1010, 1012; 31 U.S.C. 3729, 3802).

Mortgagor: Grady Redevelopment Partnership I, LP

By:

*Zicki Lundy Webb*

Date:

4/3/06

Contractor: IBG Construction Services, LLC

By:

*Kenneth S. Chestnut*  
Kenneth S. Chestnut, COO, IBG Construction Services

Date:

4/2/07

FHA

Processing Analyst

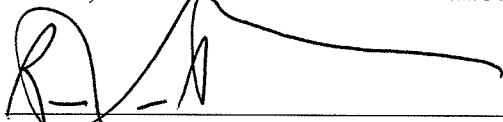
By:

Director, Multifamily Program Center

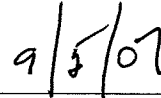
Date:

**CERTIFICATION PURSUANT TO  
MTW AGREEMENT IDENTITY OF INTEREST PROTOCOL**

Pursuant to the provisions of the Moving to Work Demonstration Agreement between the United States Department of Housing and Urban Development (HUD) and The Housing Authority of the City of Atlanta, Georgia, (AHA), effective July 1, 2003 (MTW Agreement), I certify that prior to AHA's concurrence with the Integral Building Group (IBG) serving as general contractor for the vertical construction work for Auburn Pointe Phase II that items one through six of the Identity of Interest Implementation Protocol created under the auspices of the MTW Agreement were followed in accordance with the terms of that Protocol. IBG is an affiliate of Integral Properties LLC (f/k/a The Integral Group, L.L.C.) This certification is based on the supporting documentation attached hereto, which are identified in the Protocol.



\_\_\_\_\_  
Renée Lewis Glover  
President and Chief Executive Officer  
The Housing Authority of the City of Atlanta, Georgia



\_\_\_\_\_  
Date

**THE HOUSING AUTHORITY OF THE CITY OF ATLANTA, GEORGIA (AHA)**  
**MTW AGREEMENT**  
**MTW MIXED-FINANCE CLOSING PROCEDURES PROTOCOL**  
**February 9, 2005**

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 HOPE VI or 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 including, but not limited to, relocation, demolition, site acquisition, site work, construction, case management, and administration as applicable.
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 accordance with the protocol for Replacement Housing Factor grants.



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

## SAMPLE

### Unit Distribution – Tax Credit

Unit Type	1BR	2BR	3BR	4BR	Total Units	Total Bdrms
Walkup		14	5		19	43
TOTAL		14	5		19	43

### 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.

## SAMPLE

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 .....

## SAMPLE

### 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

HUD will prepare the Mixed-Finance Amendment and AHA will prepare Exhibits A-G to the Mixed Finance Amendment, and will submit for HUD’s approval the following evidentiaries 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 Pre-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

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ACC No. FW-A-3107 2/20/96

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### 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.

## **SAMPLE**

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).

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### **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.

## SAMPLE

### 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**.

### 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  
President and Chief Executive Officer  
The Housing Authority of the City of Atlanta, Georgia

\_\_\_\_\_  
Date

**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:

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

**41**

***AHA- Mixed Finance Closing Procedures Protocol***

*Revised October 4, 2007*

## SAMPLE

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
<b>TOTAL</b>		\$20,000,000	\$0	\$20,000,000

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	Concurrence	Concurrence	Concurrence	Concurrence	Concurrence
	PIU	PIU				
Name	E Geritz	S Wilson				
Date	11/19/03					

Official Record Copy  
form HUD-713.1 (1/90)

U.S. Department of Housing and Urban Development

ref. Handbook 2221.1



**THE HOUSING AUTHORITY OF THE CITY OF ATLANTA, GEORGIA (AHA)**  
**MTW AGREEMENT**  
**PROGRAM FLEXIBILITY FOR SPECIAL PURPOSE 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 special purpose vouchers whose funding allocations are excluded from MTW Funds.

***MTW Agreement Reference***

Pursuant to Article I.B of the MTW Agreement and Article V, Section A of the Statement of Authorizations, 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 total amount of MTW Funds may be increased by additional housing choice funding allocated to AHA over the term of the MTW Agreement. The funding for special purpose vouchers cannot be included in MTW Funds during their initial term but may be included in MTW Funds upon renewal. With respect to program implementation, AHA is authorized to create its own Housing Choice Program under Article VI., Section A of the Statement of Authorizations.

**Program Flexibility for Special Purpose Vouchers**

HUD clarified that AHA's demonstration authority with respect to the implementation of AHA's Housing Choice Program applies to all allocations of housing choice vouchers, including special purpose vouchers. Although the funding for special purpose vouchers cannot be included in AHA's MTW Funds except as provided by HUD, housing choice participants with special purpose vouchers must comply with the requirements of AHA's Housing Choice Program. As the transmission of HUD-50058 forms for housing choice participants is an operational matter related to the implementation of AHA's Housing Choice Program pursuant to the MTW Agreement, AHA is permitted to transmit HUD-50058 forms for special purpose vouchers using the HUD-50058 form developed for MTW reporting.

**HUD Review**

Eugene Geritz, AHA's HUD-appointed MTW liaison, confirmed this clarification of HUD policy on September 6, 2007.

**THE HOUSING AUTHORITY OF THE CITY OF ATLANTA, GEORGIA (AHA)**  
**MTW AGREEMENT**  
**REVISION OF MTW BENCHMARKS 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. 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**

<b>Original Definitions</b>	<b>Clarified Definitions</b>
<b>Public Housing Program</b>	<b>Public Housing Program (See Note A below)</b>
<b>% Rents Uncollected</b> Annual percentage of rents that is uncollected.	<b>% Rents Uncollected</b> 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.
<b>Occupancy Rate</b> Annual physical occupancy rate.	<b>Occupancy Rate</b> 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. <b>(See Note B below)</b>

Original Definitions	Clarified Definitions
<b>Public Housing Program</b>	<b>Public Housing Program (See Note A below)</b>
<b>Emergency Work Orders Completed or Abated in &lt;24 Hours</b> Percentage of emergency work orders that will be completed or abated in less than 24 hours.	<b>Emergency Work Orders Completed or Abated in &lt;24 Hours</b> 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.”)
<b>Routine Work Orders Completed in &lt; 30 Days</b> Percentage of routine work orders that will be completed in less than 30 days.	<b>Routine Work Orders Completed in &lt; 7 Days</b> The average number of days that all non-emergency work orders will be active during the FY shall be 7 days or less.
<b>% Planned Inspections Completed</b> Percentage of all units inspected and common areas.	<b>% Planned Inspections Completed</b> 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. <b>(See Note C below)</b>
<b>Housing Choice Program (Section 8)</b>	<b>Housing Choice Program (Section 8)</b>
<b>Budget Utilization Rate</b> Annual percentage of Housing Choice Budget authority spent on housing assistance payments and administration.	<b>Budget Utilization Rate</b> 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%. <b>(See Note D below)</b>
<b>% Planned Annual Inspections Completed</b> Annual percentage of occupied units inspected.	<b>% Planned Annual Inspections Completed</b> 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
<b>Housing Choice Program (Section 8)</b>	<b>Housing Choice Program (Section 8)</b>
<b>Quality Control Inspections</b> Annual percentage of previously inspected units (initial or renewal inspection) that will be inspected again for quality control purposes.	<b>Quality Control Inspections</b> 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.
<b>Community and Supportive Services</b>	<b>Community and Supportive Services</b>
<b>Resident Homeownership</b> Annual number of Public Housing or Housing Choice residents who close on purchasing a home.	<b>Resident Homeownership</b> 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.
<b>Resident Workforce Participation</b> Annual number of Public Housing or Housing Choice heads of households (excluding elderly and disabled) who are in the workforce.	<b>Household Work/Program Compliance</b> 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. <b>(See Note E below)</b>
<b>Finance</b>	<b>Finance</b>
<b>Project –Based Financing Closings</b> Annual number of properties refinanced using project based financing demonstration principles.	<b>Project –Based Financing Closings</b> The annual number of projects in which AHA will commit project-based vouchers and/or make an investment of MTW funds. <b>(See Note F below)</b>

**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).

<b>CATALYST Compliance Meanings</b>	
Full-time Worker	<ul style="list-style-type: none"> <li>• Employed for 30 or more hours per week</li> </ul>
Participation in an approved program	<ul style="list-style-type: none"> <li>• attending an accredited school as a "full-time" student</li> <li>• participating in an approved "full-time" training program</li> <li>• attending an accredited school as a "part-time" student, AND successfully participating in an approved "part-time" training program</li> </ul>
Part-time Job and Part-time Program Participant	<ul style="list-style-type: none"> <li>• Employed as a part-time employee (at least 16 hours) AND successfully participating in an approved training program</li> <li>• Employed as a part-time employee (at least 16 hours) AND successfully participating in an accredited school as a "part-time" student</li> </ul>

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

- F. 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
<b>Public Housing Program</b>								
% Rents Uncollected	2%	≤2%	≤2%	≤2%	≤2%	≤2%	≤2%	≤2%
Occupancy Rate <b>(See Note A below)</b>	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%
<b>Housing Choice Program (Section 8)</b>								
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%
<b>Community and Supportive Services</b>								
Resident Homeownership	6	35	35	70	85	100	110	120
Household Work/Program Compliance <b>(See Note B below)</b>	N/A	N/A	N/A	55%	62%	71%	74%	75%
<b>Finance</b>								
Project-Based Financing Closings <b>(See Note C below)</b>	0	6	6	6	6	6	6	6
Investment Deals Involving MTW Funds <b>(See Note C below)</b>	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 (AHA)**  
**MTW AGREEMENT**  
**USE OF MTW FUNDS PROTOCOL**  
**June 30, 2006**

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***

**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. 1437i) 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.

- 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.



## AHA MTW Agreement, Attachment G

### Good Cause Justification for Waiver of Sections of 24 CFR 941

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**  
**DESIGNATION OF ELDERLY AND DISABLED**  
**PUBLIC HOUSING ASSISTED UNITS 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. 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 the Fair Housing Act, 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 non-elderly 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 Non-Elderly 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 non-elderly 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 non-elderly disabled individuals in our 17 high-rise communities. AHA also plans to implement 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, the law firm of Reno and Cavanaugh opined that "the MTW Program gives broad authorization to participating public housing agencies ("PHA") in the design

and implementation of creative housing programs... Further, the MTW Agreement specifically supersedes any provisions of the 1937 Act if necessary to implement activities contained within the Statement of Authorizations. 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 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. 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 ensure that these designations comply with Fair housing. The term of each designation will be consistent with the term of AHA's Moving to Work (MTW) Agreement including any extensions, or longer as approved by HUD on a case-by-case basis.
3. AHA will cooperate with HUD on any related audits or investigations to ensure that Fair Housing requirements are met on an ongoing basis.

## **HUD Review**

Pending HUD's review and approval of AHA's FY2008 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

The Housing Authority of the City of Atlanta, Georgia

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Designation of Senior and Disabled Public Housing Developments Protocol page 64

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 Renée 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)  
Steve Holmquist (Reno & Cavanaugh)  
Joy Fitzgerald, AHA  
Gloria Green, AHA  
Renée Bentley, AHA

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.<sup>1</sup>

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.

<sup>1</sup> 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.<sup>2</sup> 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,<sup>3</sup> 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.<sup>4</sup> 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.<sup>5</sup> 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.

<sup>2</sup> See Pub. L. 104-134, Sec. 204(b), (e)

<sup>3</sup> 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.

<sup>4</sup> *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.

<sup>5</sup> 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.<sup>6</sup> 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..."<sup>7</sup> AHA's

<sup>6</sup> 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.

<sup>7</sup> 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

**THE HOUSING AUTHORITY OF THE CITY OF ATLANTA, GEORGIA (AHA)**  
**MTW AGREEMENT**  
**HOPE VI AND OTHER HUD-FUNDED MASTER PLANNED ON AND OFF-**  
**SITE DEVELOPMENTS SITE AND NEIGHBORHOOD STANDARDS**  
**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 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 Site and Neighborhood Standards related to HOPE VI Replacement Housing and Other HUD-funded Master Planned On and Off-Site Developments.**

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 and other HUD-funded master planned developments on

and off-site housing that otherwise do not meet HUD Site and Neighborhood Standards. 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 as set forth in Section VI.B.3.A 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 and other HUD-funded master planned on and off-site development sites.

#### **HUD Review**

Pending HUD’s review and final approval of AHA’s FY2008 CATALYST Implementation Plan.

**THE HOUSING AUTHORITY OF THE CITY OF ATLANTA, GEORGIA (AHA)**  
**MTW AGREEMENT**  
**PROCESS FOR MANAGING REPLACEMENT HOUSING FACTOR (RHF) FUNDS**

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 the following process for managing Replacement Housing Factor (RHF) funds.

***MTW Agreement Reference***

In accordance with the provision of the MTW Agreement, Article I.B, AHA is authorized to 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. AHA has elected to follow HUD guidance in its use as outlined in this protocol.

***AHA Process for Managing Replacement Housing Factor (RHF) Funds***

In accordance with HUD guidance, upon award of annual increments of RHF Funds from HUD, AHA will determine whether to use the increments in one of the following manners:

1. Separately for the construction or acquisition of replacement housing. If used separately, each award will be subject to the normal statutory two-year obligation and four-year expenditure requirements.
2. Combined with previously accumulated awards to accrue sufficient funds to support a replacement housing construction or acquisition project(s). If combined with up to four years of accumulated previous awards (thus creating a five-year accumulation) the obligation and expenditure deadlines for the entire accumulation becomes the normal statutory dates for the most recent award.
3. Establish a new one to five year accumulation period, provided that either or both increments includes a new tier in that fiscal year. In this case, the obligation and expenditure deadlines for the entire accumulation will become the normal statutory dates for the last award in the accumulation.

AHA will notify the Atlanta HUD Field Office of the decision to accumulate the funds and their intended use in a schedule of ***Proposed Use of RHF Funds***. Based on the selection of the alternatives listed above, AHA may have more than one accumulation of RHF funds available at one time.

Changes may occur in tax credit awards, increases in construction cost and other unanticipated events that may require changes in the exact amounts of funds allocated to each development and each phase in this RHF plan. In this event AHA will notify HUD that changes in allocations are required. The obligation and expenditure dates and total funding amount will not change.

RHF funds may be expended for the pro rata share of all development costs including, but not limited to, acquisition of property for the development of housing affordable to low income families, relocation of residents, demolition and site improvement of land to be used for housing affordable to low income families, construction of housing, administrative costs, and fees and costs. RHF may not be used for Community Supportive Services (CSS) or for demolition costs if a HOPE VI Demo Grant has been awarded to AHA.

The use of RHF funds will be identified in Exhibit F1 Sources and Uses for each phase in conjunction with the closing of each phase. Funds required prior to closing for predevelopment costs on projects identified in the accumulation will be requested from the local HUD office and AHA's MTW liaison, Eugene Geritz.

AHA's MTW Annual Report will address the use of Replacement Housing Factor funds in the context of AHA's revitalization program and will refer to the RHF plan for details.

Although all increments identified in the RHF plan have the same Obligation and Expenditure End Dates, each annual increment award must be at least 90% obligated by its Obligation End Date. Should the situation arise that the sequence of actual use of the grants causes some awards to be 100% obligated, but others to fall below 90%, AHA will work with OPHI to fudge the expenditures to allow all awards to meet the 90% standard.

## **HUD Review**

Pending HUD's review and approval of AHA's FY2008 CATALYST Implementation Plan.



Proposed Use of Replacement Housing Factor (RHF) Funds																		
Grant year			Increment	RHF Available	2003-1	2003-2	Total	2004-1	2004-2	Total	2005-1	2005-2	Total	2006-1	2006-2	Total	2007	Total Allocated
2003			1	3,432,489	3,432,489													3,432,489
			2	2,435,481		2,435,481												2,435,481
2004			1	4,540,123				4,540,123										4,540,123
			2	3,398,919					3,398,919									3,398,919
2005			1	2,712,327							2,712,327							2,712,327
			2	5,292,808								5,292,808						5,292,808
2006			1	1,567,427										1,567,427				1,567,427
			2	5,941,122											5,941,122			5,941,122
2007			1&2	7,500,000													7,500,000	7,500,000
					3,432,489	2,435,481	5,867,970	4,540,123	3,398,919	7,939,042	2,712,327	5,292,808	8,005,135	1,567,427	5,941,122	7,508,549	7,500,000	36,820,696
Grady																		
Phase			Closing Date	RHF Needed	2003-1	2003-2	Total	2004-1	2004-2	Total	2005-1	2005-2	Total	2006-1	2006-2	Total	2007	Total Allocated
Increment					3,432,489	2,435,481	5,867,970	4,540,123	3,398,919	7,939,042	2,712,327	5,292,808	8,005,135	1,567,427	5,941,122	7,508,549	7,500,000	66,141,392
Phase I			21 HO	-														-
Phase II			38 PH	4,370,845	3,432,489	938,356												4,370,845
Phase III			54 PH	5,672,995											4,776,838		896,157	5,672,995
Phase IV			53 PH	-														-
Phase V			14 HO	-														-
Phase VI (Graves)			195 PH	6,603,843													6,603,843	6,603,843
Phase VII (Graves Annex)			36 PH	-														-
Phase VIII (University)			45 PH	-														-
Phase IX (University)			TBD	-														-
Phase IX (University)			TBD	-														-
Public Improvements Bridge or Acquisitions																		-
				16,647,683	3,432,489	938,356	4,370,845	-	-	-	-	-	-	-	4,776,838	4,776,838	7,500,000	16,647,683
Balance Available					-	1,497,125	1,497,125	4,540,123	3,398,919	7,939,042	2,712,327	5,292,808	8,005,135	1,567,427	1,164,284	2,731,711	-	16,647,683
McDaniel Glenn																		
Phase			Closing Date	Total Needed	2003-1	2003-2	Total	2004-1	2004-2	Total	2005-1	2005-2	Total	2006-1	2006-2	Total	2007	Total Allocated
Increment				0														
Phase I				-														0
Phase II			Dec-06	-														0
Phase III			Dec-06	-														0
Phase IV			Jul-07	11,348,419	-	1,497,125												
Phase V			Jul-07	8,824,594				4,540,123	3,398,919		1,912,252							11,348,419
Phase VI			Jul-08	-							800,075	5,292,808		1,567,427	1,164,284			8,824,594
Phase VII			Jul-08	-														0
Public Improvements Bridge or Acquisitions																	-	0
Subtotal				20,173,013	-	1,497,125	1,497,125	4,540,123	3,398,919	7,939,042	2,712,327	5,292,808	8,005,135	1,567,427	1,164,284	2,731,711	-	20,173,013
Total					3,432,489	2,435,481	5,867,970	4,540,123	3,398,919	7,939,042	2,712,327	5,292,808	8,005,135	1,567,427	5,941,122	7,508,549	7,500,000	36,820,696



May 15, 2007

Ms. Dominique Blom  
Deputy Assistant Secretary  
of Public Housing Investment  
U.S. Department of Housing and Urban Development  
451 7<sup>th</sup> Street, S.W.  
Washington, DC 20410-5000

Dear Ms. Blom:

**RE: Use of Replacement Housing Factor grants, Fiscal Years 2003-2007**

I want to express my appreciation for the opportunity you gave Ken Sadeckas and me to meet with you and your staff on April 17th to discuss the use of Replacement Housing Factor (RHF) grants. Not only was this meeting extremely informative, but we believe that we came away with a very viable plan to use the Fiscal Year 2003-2007 RHF grants and a template for using future RHF awards. The following outlines our understanding of the issues that were discussed. Please let me know if any of these need to be revised.

- HUD staff confirmed that the Atlanta Housing Authority (AHA) could treat all of the funds received in the Fiscal Year 2003-2007 RHF grant awards, both first and second increments, as having been accumulated for use as part of the HOPE VI revitalizations of McDaniel Glenn and Grady Homes.
- AHA's RHF plan for using the first and second increments of these grants is identified in the attached document, "Proposed Use of RHF Funds." The amounts indicated for Fiscal year 2007 are estimates and will be adjusted when funding is identified.
- Changes may occur in tax credit awards, increases in construction cost and other unanticipated events that may require changes in the exact amounts of funds allocated to each development and each phase in this RHF plan. In this event AHA will notify HUD that changes in allocations are required. The obligation and expenditure dates and total funding amount will not change.

## **Use of Replacement Housing Factor grants, Fiscal Years 2003-2007**

**May 15, 2007**

**Page 2**

- HUD's Office of Public Housing Investments (OPHI) staff and AHA agreed that the RHF funds may be expended for the pro rata share of all development costs including, but not limited to, acquisition of property for the development of housing affordable to low income families, relocation of residents, demolition and site improvement of land to be used for housing affordable to low income families, construction of housing, administrative costs, and fees and costs. RHF may not be used for Community Supportive Services (CSS) or for demolition costs if a HOPE VI Demo Grant has been awarded to AHA.
- HUD's Office of Capital Improvements has established new Obligation and Expenditure End Dates of December 29, 2009 and December 29, 2011 respectively for all increments of the RHF grants awarded in Federal Fiscal Years 2003 through 2006 and will establish the same dates for Federal Fiscal Year 2007 awards. OCI also established Obligation Start dates of December 12, 2007, but will revise these dates to accommodate actual expenditures upon receipt of a copy of AHA's letter to the Atlanta Field Office describing its RHF Plan. AHA submitted this letter to the Field Office with a copy to OCI on April 24, 2007.
- The use of RHF funds will be identified in Exhibit F1 Sources and Uses for each phase prior to obligation in conjunction with the closing of each phase. Funds required prior to closing for predevelopment costs on projects identified in the accumulation will be requested from the local HUD office and AHA's MTW liaison, Eugene Geritz. F1s supporting this RHF plan will be submitted to you under separate cover.
- HUD staff agreed that for RHF grants awarded in FFY08 and later, AHA has the option to accumulate up to five years of RHF first or second increment awards in a similar manner, provided that the one to five year accumulation period for either or both increments begins in a year when a new tier has been added to that increment in that fiscal year. Both OPHI and AHA anticipate that there will be a new tier added to each increment every year in the foreseeable future.
- Based on a conversation between Rick Smith and Ken Sadeckas on April 24<sup>th</sup>, it was agreed that for any year that no new tier is added to an increment and it is not part of a previous accumulation, OPHI will work with AHA to optimize the use of that increment.
- AHA's Annual CATALYST MTW Report will address the use of Replacement Housing Factor funds in the context of AHA's revitalization program and will refer to the RHF plan for details.

## **Use of Replacement Housing Factor grants, Fiscal Years 2003-2007**

**May 15, 2007**

**Page 3**

- Although all increments identified in the attached RHF plan have the same Obligation and Expenditure End Dates, each annual increment award must be at least 90% obligated by its Obligation End Date. OPHI agreed that, should the situation arise that the sequence of actual use of the grants causes some awards to be 100% obligated, but others to fall below 90%, OPHI will work with AHA to funge the expenditures to allow all awards to meet the 90% standard.

Please contact me at 404-817-7250 or Ken Sadeckas at 404-817-7350 if you have any questions.

Sincerely,

**[ORIGINAL SIGNED]**

Stephen D. Nolan

Chief Financial Officer

Enclosures

cc: Susan Wilson  
Gene Geritz  
Jennifer Powers  
Richard Smith  
Renée Lewis Glover  
Joy Fitzgerald

**THE HOUSING AUTHORITY OF THE CITY OF ATLANTA, GEORGIA (AHA)**  
**MTW AGREEMENT**  
**PROJECT BASED RENTAL ASSISTANCE - DEVELOPER SELECTION 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. Using its MTW flexibility, AHA will use an alternate process for selecting developers for the project based rental assistance program.

**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 the Fair Housing Act, to the extent necessary for the Agency to implement its MTW demonstration. Appendix A, the Statement of Authorizations, Section VI B authorizes AHA to develop and adopt a reasonable policy and process for project-basing Section 8 leased housing assistance during the MTW Demonstration; this includes the establishment of a reasonable competitive process for selection of developers. Project Based Rental Assistance as a Development Tool has been included in AHA’s Annual MTW Plans for 2006, 2007 and is one of the six priorities in the 2008 MTW Plan.

**AHA Process for Project Based Rental Assistance Developer Selection**

AHA will continue to utilize 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 greater housing opportunities in mixed-income communities for very low income families, AHA will provide Project Based Rental Assistance in support of the Low Income Housing Tax Credit (LIHTC) applications under the annual Qualified Allocation Plan (QAP) for the State of Georgia. AHA will also use Project Based Rental Assistance to support projects financed with tax exempt bonds. Proposals will also be solicited under the AHA Project Based Rental Assistance Homeless and Mental Health Demonstration Programs.

**Projects Financed with Tax Exempt Bonds** – Once each year, AHA will utilize a “Request for Proposal”

process as defined in the Agency Procurement Policies to provide the specific project requirements and project selection criteria for projects that will be financed with tax exempt bonds (with or without 4% Low Income Housing Tax Credits) which are seeking Project Based Rental Assistance. Since bond allocations may be received by developers from the State throughout the year responses to this Request for Proposals may be received at any time for one year from the time the RFP was issued.

**Projects Financed with 9% Low Income Housing Tax Credits** – Upon issuance of the State Qualified Allocation Plan (QAP) for Low Income Housing Tax Credits, AHA will utilize a “Request for Proposals” process as defined in the Agency Procurement Policies to provide the project requirements and selection criteria for projects to be financed with Low Income Housing Tax Credits. Proposals for projects to be financed with 9% LIHTC’s will have a specific due date to enable review and selection prior to the required submission deadline for the LIHTC application.

**Demonstration Projects** - AHA will utilize a “Request for Proposals” (RFP) process as defined in the Agency Procurement Policies for designated demonstration programs developed under the Project Based Rental Assistance Program. This includes the Homeless Demonstration and the Mental Health Demonstration; and, any future demonstration programs that may be developed to support populations with special needs. The demonstration programs utilize distinct criteria for award of Project Based Rental Assistance and such criteria may vary for each solicitation pursuant to the partnership agreements through which these programs provide the required supportive services for the special needs populations they serve.

**Site and Neighborhood Standards** – All sites proposed in response to any of the above identified request for proposals may be located in AHA’s jurisdiction or in adjacent jurisdictions (if there is separate intergovernmental agreement with housing authorities in those jurisdictions allowing AHA to operate there including) within the following types of urban areas: (i) an area of revitalization that has been designated as such by the City of Atlanta, (ii) an area where public housing units were previously constructed and were demolished, (iii) a racially or economically impacted area where AHA plans to preserve existing affordable housing or (iv) in connection with a HOPE VI or other HUD funded master planned development; and (v) sites located in a non-impacted or racially mixed census tract that otherwise meets HUD’s Site and Neighborhood Standards.

**Selection and Approval** – A PBRA Project Evaluation Committee will be appointed by the SVP of REDA who will be responsible for evaluating and scoring all project proposals in accordance with published selection criteria. Upon completion of evaluations, the committee will forward projects recommended for

approval to the AHA Board of Commissioners.

### **HUD Review**

This new protocol was reviewed by Eugene Geritz, AHA's HUD-appointed MTW liaison, as a step in the approval process prior to including the new protocol in AHA's response to HUD's FY 2008 MTW Annual Plan Conditional/Partial Approval letter dated August 20, 2007. Protocol is pending HUD's final approval of AHA's FY2008 CATALYST Implementation Plan.

**THE HOUSING AUTHORITY OF THE CITY OF ATLANTA, GEORGIA (AHA)**  
**MTW AGREEMENT**  
**HUD FUNDING AVAILABILITY PROTOCOL**  
**November 9, 2007**

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. Consistent with the statutory and regulatory flexibility provided under AHA's MTW Agreement, AHA is using a methodology for determining the total number of eligible low-income families assisted during the MTW Demonstration Period as an approach in addressing the volatility in the availability of HUD funding to assist families.

***MTW Agreement Reference***

In accordance with the provisions of the MTW Agreement, Appendix A - Statement of Authorizations Sections I.F; III.A; and V.A, AHA has the flexibility to pursue locally driven policies, procedures and programs to develop more efficient ways of providing housing assistance to low- and very-low income families; to expand, improve and diversify AHA's portfolio and to provide flexibility in the design and administration of housing assistance to eligible families while reducing costs and achieving greater cost effectiveness.

***HUD Funding Availability Protocol***

Article I, Section H of AHA's MTW Agreement provides that "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." Although AHA fully intends to effectively serve as many low-income eligible families as feasible under its MTW demonstration program, AHA recognizes that its ability to provide subsidy to families is dependent



upon the amount of subsidy AHA receives from HUD. Any substantial decreases in funding from HUD would have a negative impact on AHA's ability to serve the same number of families.

In order to facilitate the development or preservation of affordable housing, AHA has been provided the flexibility to invest MTW Block grant funds into mixed-income, mixed-finance developments, owned by private developers, serving low-income families (households who earn 80% or less of the metropolitan area median income (AMI)).

For purposes of counting the total number of eligible low-income families assisted or served by AHA during the term of the MTW Agreement, AHA will include in its tabulation:

1. Households earning 80% and below of AMI who reside in:
  - (a) AHA-sponsored mixed-income multi-family rental communities;
  - (b) AHA-owned public housing communities;
  - (c) Project-based rental assisted units in communities owned by private owners; and
  - (d) Mixed-finance/ Mixed-income multi- family rental communities owned by private owners where AHA is providing PBRA and/or has made a capital investment to support the development or preservation of affordable housing for low-income families (households who earn 80% or less of AMI).
2. Families participating in the housing choice voucher program.

This approach will allow AHA the greatest opportunity, to the extent that funding for these housing opportunities are not substantially cut or reduced by HUD, to (1) count eligible low-income families assisted under various subsidy programs; (2) mitigates the risk of AHA being adversely affected in the number of families served due to HUD funding reductions; and (3) allows AHA to comply with provisions of the Agreement regarding the number of families served while allowing AHA to take

advantage of the flexibility offered under MTW on how housing assistance is provided to low-income families.

### **HUD Review**

This new protocol was reviewed by Eugene Geritz, AHA's HUD-appointed MTW liaison, as a step in the approval process prior to including the new protocol in AHA's response to HUD's FY 2008 MTW Annual Plan Conditional/Partial Approval letter dated August 20, 2007. Protocol is pending HUD's final approval of AHA's FY2008 CATALYST Implementation Plan.

**THE HOUSING AUTHORITY OF THE CITY OF ATLANTA, GEORGIA (AHA)**  
**MTW AGREEMENT**  
**DISPOSITION OF PUBLIC HOUSING OPERATING SUBSIDY**  
**IN AHA-SPONSORED 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 improved effectiveness and preservation of low-income housing at AHA-sponsored mixed-finance communities, AHA will, on a case-by case basis, seek HUD approval of the disposition of the public housing operating subsidy under Section 9 of the 1937 Act and its conversion to long-term, renewable project based rental assistance under Section 8 of the 1937 Act.

**MTW Agreement Reference**

Pursuant to Article VI, Section C of the Statement of Authorizations (Appendix A of the MTW Agreement), AHA, in consultation with HUD, may convert, as appropriate and feasible, all or a portion of its public housing assisted units from public housing operating subsidy under Section 9 of the 1937 Act to project-based rental assistance under Section 8 of the 1937 Act. This initiative is referred to as the Project Based Financing Demonstration in the MTW Agreement.

**Disposition of Public Housing Operating Subsidy in AHA-Sponsored Mixed-Finance Communities**

As set forth in AHA's FY 2008 Annual MTW Plan, AHA will pursue strategies to sustain and preserve its investments in low-income housing at AHA-sponsored, mixed-income, mixed-financed communities. The disposition of Section 9 subsidy and conversion to renewable project based rental assistance under Section 8 will ensure the viability, sustainability and preservation of each mixed-finance, mixed-income investment. Disposing of the Section 9 subsidy during the economic life of the property as it begins to age allows the Owner Entity to raise new capital to be re-invested in the community to ensure its continued viability. Consistent with AHA's vision and mission, the Section 8 subsidy will ensure the availability and sustainability of affordable housing inside of mixed-income, mixed-financed developments.

**HUD Policy Statement Regarding Disposition Strategy**

Subsequent to AHA's submission of its FY 2008 Plan, HUD responded in a letter dated August 20, 2007

outlining its conditional/partial approval of AHA's FY 2008 MTW Annual Plan. In doing so, HUD OPHI acknowledged that several portions of the FY 2008 Annual MTW Plan made reference to initiatives for changing the subsidy in ACC units in mixed-finance developments from the traditional operating subsidy (Section 9) to project-based rental assistance under Section 8. HUD's current policy on such conversions is outlined as follows:

*Several portions of the FY 2008 Annual Plan reference initiatives for changing the subsidy in ACC units (both public housing only and mixed finance developments) from the traditional operating subsidy (Section 9) to project based vouchers under Section 8. The Department is willing to consider such conversions on a case-by-case basis; however it cannot support a blanket approach to such conversions. In considering such requests, the Department will not provide additional vouchers in support of such a strategy; AHA will need to commit vouchers from its own inventory. The terms of the affordability restrictions that exist on the property, in the form of a Declaration of Trust, will need to remain effective as to the term and income restrictions of the affordability restriction, and be replaced with a new land use deed restriction. ACC units removed from the Declaration of Trust and the public housing inventory in such a fashion will not be eligible for replacement housing factor funds (RHF). The removal of the public housing units from the ACC is to be accomplished through the approval of the disposition by the SAC and a subsequent approval by OPHI of all necessary amendments to the applicable Mixed-Finance Amendments.<sup>1</sup>*

### **Implementation of Disposition**

Consistent with AHA's disposition strategy and HUD's policy statement, AHA will submit disposition applications to HUD's Special Applications Center to dispose of the public housing operating subsidy supporting the specific number of units governed by and funded under the Annual Contributions Contract (ACC) and its corresponding Mixed-Finance Amendment for each respective community. There will be two primary approaches to handling dispositions based on whether the respective community is located on AHA owned land or non-AHA owned land and are outlined as follows:

**1. Mixed-Finance Communities Where AHA Is The Ground Lessor.** In these transactions, AHA had entered into a long-term ground lease covering the land to further the public purpose of providing housing for low-income families. In such cases, AHA would submit a disposition application for the disposition of the

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<sup>1</sup> Housing Authority of the City of Atlanta's FY 2008 Annual Moving to Work Plan – Conditional/Partial Approval Letter dated August 20, 2007

public housing operating subsidy funding the affordable units in a mixed-finance community under a Section 9 ACC; and upon receipt of HUD's approval of the disposition application, AHA would enter into a long-term Section 8-funded project-based rental assistance agreement with the owner entity for the same number and type of units that were previously funded under the Section 9 ACC. In connection with the submission of the disposition application, AHA would not apply for relocation vouchers for the public housing assisted units because the disposition would not be connected to a relocation activity. Instead, the disposition would be similar to a conversion activity which would be funded by either AHA or HUD. AHA would use its current Section 8 allocation of funding to effect the conversion as suggested in OPHI's letter; or HUD would issue a new allocation of Section 8 funding in support of the conversion based on the availability of funding.

The purpose of the subsidy conversion from Section 9 to Section 8 would be to create a rent structure and funding mechanism that would allow the mixed-finance community to operate at a more sustainable level. In this scenario, AHA would continue its current roles (e.g., as ground lessor or second mortgage lender) in the transaction.

The communities that are candidates for disposition under this scenario are:

#### **Mixed-Income Communities**

Ashley Collegetown  
Auburn Pointe  
Capitol Gateway  
Centennial Place I  
Centennial Place II  
Centennial Place III  
Centennial Place IV  
Columbia at Mechanicsville Apartments  
Columbia Senior Residences at Mechanicsville  
Columbia Commons  
Columbia Village  
Magnolia Park I  
Magnolia Park II  
Mechanicsville  
The Village at Castleberry Hill I

The Village at Castleberry Hill II  
The Villages at Carver I  
The Villages at Carver II  
The Villages at Carver III  
The Villages of East Lake I  
The Villages of East Lake II  
Columbia Estates at West Highlands  
Columbia Grove at West Highlands  
Columbia Park Citi at West Highlands  
Columbia Creste at West Highlands

This list is not exhaustive, and does not preclude the inclusion of other mixed-income, mixed-financed developments that may later become candidates for disposition consistent with this protocol.

**2. Mixed-Finance Communities Where AHA Is Not The Ground Lessor And Where AHA Has Made A Determination To Provide Project-Based Rental Assistance To The Mixed-Finance Community.** In this second scenario, AHA does not own the land on which the mixed-finance community has been built and AHA has determined that it is in the best interest of AHA and the residents to provide project-based rental assistance to the mixed-finance 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.

In such cases, AHA would submit a disposition application for the disposition of the public housing operating subsidy funding the affordable units in a mixed-finance community under a Section 9 ACC; and upon receipt of HUD's approval of the disposition application, AHA would enter into a long-term Section 8-funded project-based rental assistance agreement with the owner entity for the same number and type of units that were previously funded under the Section 9 ACC. In connection with the submission of the disposition application, AHA would not apply for relocation vouchers for the public housing assisted units because the disposition would not be connected to a relocation activity. Instead, the disposition would be similar to a conversion activity which would be funded by either AHA or HUD. AHA would use its current Section 8 allocation of funding to effect the conversion as suggested in OPHI's letter; or HUD would issue a new allocation of Section 8 funding in support of the conversion based on the availability of funding.

The purpose of the subsidy conversion from Section 9 to Section 8 would be to create a rent structure and funding mechanism that would allow the mixed-finance community to operate at a more sustainable level and promote the long-term financial sustainability and improved performance of the mixed-finance 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.

The communities that are candidates for disposition under this scenario are:

- Ashley Courts at Cascade I
- Ashley Courts at Cascade II
- Ashley Courts at Cascade III
- Ashley Terrace at West End
- Columbia Commons
- Columbia Village
- Summerdale Commons I
- Summerdale Commons II

In both scenarios, AHA would work with the owner entity 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 would 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.

### **HUD Review**

HUD OPHI's letter of August 20, 2007 outlining its conditional/partial approval of AHA's FY 2008 MTW Annual Plan formed the basis for finalizing the requirements of this protocol. Additional guidance with respect to this protocol was provided by Eugene Geritz, AHA's HUD-appointed MTW liaison. Protocol is pending HUD's final approval of AHA's FY2008 MTW Annual Plan.

**THE HOUSING AUTHORITY OF THE CITY OF ATLANTA, GEORGIA (AHA)**  
**MTW AGREEMENT**  
**DISPOSITION OF PUBLIC HOUSING OPERATING SUBSIDY**  
**IN AHA-OWNED AFFORDABLE 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 improved effectiveness and preservation of low-income housing at AHA-owned Affordable Communities, AHA will, on a case-by case basis, seek HUD approval of the disposition of the public housing operating subsidy under Section 9 of the 1937 Act and its conversion to long-term, renewable project based rental assistance under Section 8 of the 1937 Act.

**MTW Agreement Reference**

Pursuant to Article VI, Section C of the Statement of Authorizations (Appendix A of the MTW Agreement), AHA, in consultation with HUD, may convert, as appropriate and feasible, all or a portion of its public housing assisted units from public housing operating subsidy under Section 9 of the 1937 Act to project-based rental assistance under Section 8 of the 1937 Act. This initiative is referred to as the Project Based Financing Demonstration in the MTW Agreement.

**Disposition of Public Housing Operating Subsidy in AHA-Owned Affordable Communities**

AHA set forth a strategy in its FY 2008 Annual MTW Plan outlining a means to sustain and preserve investments in low income housing at AHA-owned Affordable Communities, particularly at those developments that provide housing for seniors and persons with disabilities. Through the disposition of Section 9 subsidy and conversion to renewable project-based rental assistance under Section 8, the opportunity to achieve long-term viability for AHA's Affordable communities that it will continue to own can be realized. Although this strategy is primarily aimed at Affordable Communities for seniors and residents with disabilities, AHA would also consider the implementation of this strategy at two Affordable communities for families that are not included in AHA's Quality of Life Initiative (QLI).

This strategy is unique to AHA because after AHA finalizes the implementation of QLI, AHA will own 11 Affordable high-rise communities and two Affordable family communities. A major outcome of AHA's business plan is that AHA will be a primary provider of housing for seniors and residents with disabilities in the communities it owns. AHA will advance this innovative subsidy strategy in an intentional and strategic manner within the MTW regulatory relief already granted to AHA.



Being extremely sensitive to the needs of seniors and persons with disabilities, AHA 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. AHA would also be able to generate the income necessary to reinvest in these communities in order to meet the accessibility needs of these special populations. Additionally, this subsidy would complement and enrich the environments for resident populations in designated housing communities, when such designations are appropriate in creating the best environments for communal living.

### **HUD Policy Statement Regarding Disposition Strategy**

Subsequent to AHA's submission of its FY 2008 Plan, HUD responded in a letter dated August 20, 2007 outlining its conditional/partial approval of AHA's FY 2008 MTW Annual Plan. In doing so, HUD OPHI acknowledged that several portions of the FY 2008 Annual MTW Plan made reference to initiatives for changing the subsidy in ACC units from the traditional operating subsidy (Section 9) to project-based rental assistance under Section 8. HUD's current policy on such conversions is quoted as follows:

*Several portions of the FY 2008 Annual Plan reference initiatives for changing the subsidy in ACC units (both public housing only and mixed finance developments) from the traditional operating subsidy (Section 9) to project based vouchers under Section 8. The Department is willing to consider such conversions on a case-by-case basis; however it cannot support a blanket approach to such conversions. In considering such requests, the Department will not provide additional vouchers in support of such a strategy; AHA will need to commit vouchers from its own inventory. The terms of the affordability restrictions that exist on the property, in the form of a Declaration of Trust, will need to remain effective as to the term and income restrictions of the affordability restriction, and be replaced with a new land use deed restriction. ACC units removed from the Declaration of Trust and the public housing inventory in such a fashion will not be eligible for replacement housing factor funds (RHF). The removal of the public housing units from the ACC is to be accomplished through the approval of the disposition by the SAC and a subsequent approval by OPHI of all necessary amendments to the applicable Mixed-Finance Amendments.<sup>1</sup>*

Standing HUD rules, regulations and guidelines governing the demolition and disposition of public housing

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<sup>1</sup> Housing Authority of the City of Atlanta's FY 2008 Annual Moving to Work Plan – Conditional/Partial Approval Letter dated August 20, 2007

units including the provision of new Housing Choice Vouchers, will remain in effect for AHA-owned Affordable Communities being demolished under AHA's Quality of Life Initiative or those undergoing revitalization in connection with a HUD approved Revitalization Plan and mixed-finance closing.

### **Implementation of Disposition**

In order to promote the more effective and efficient operation of low-income housing at AHA-owned Affordable Communities, AHA would dispose of the public housing subsidy from under the existing Annual Contributions Contract ("ACC") consistent with AHA's disposition strategy and prevailing HUD policy.

AHA will either submit a new disposition application or amend an existing disposition application in accordance with Section 18 of the U.S. Housing Act of 1937, as amended (the "Act"). Information provided in the application will include the following: (1) the public housing assisted units are being disposed from under the ACC; (2) the public housing assisted units that will no longer constitute public housing assisted units; and (3) the number of units that will continue to be restricted as low-income housing for the remaining period of time under the applicable 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 disposition is appropriate and is in the best interests of the residents and AHA; and the disposition is consistent with the goals of the AHA and the AHA's MTW Annual Plan. AHA reserves the right to withdraw any disposition application or amendment if AHA determines that the outcome will not support AHA's strategy.

In practical terms related to implementation, AHA would submit disposition applications for the disposition of the public housing operating subsidy used in funding the units in the Affordable Communities from under the Section 9 ACC; and upon receipt of HUD's approval of the disposition applications, AHA would convert the subsidy structure of its Affordable Communities into long-term Section 8-funded project-based rental assistance. In connection with the submission of the disposition application, AHA would not apply for relocation vouchers for the public housing assisted units because the disposition would not be connected to a relocation activity. Instead, the disposition would be similar to a conversion activity which would be funded by either AHA or HUD. AHA would use its current Section 8 allocation of funding to effect the conversion as suggested in OPHI's letter; or HUD would issue a new allocation of Section 8 funding in support of the conversion based on the availability of funding.

The communities that are candidates for disposition using this strategy are:

**Family Communities (2)**

Westminster

Martin Street Plaza

**High-rise Communities (11)**

Barge Road

Cheshire Bridge

Cosby Spear Towers

East Lake Towers

Georgia Avenue

Hightower Manor

Juniper & 10<sup>th</sup>

Marian Road

Marietta Road

Peachtree Road

Piedmont Road

**HUD Review**

HUD OPHI's letter of August 20, 2007 outlining its conditional/partial approval of AHA's FY 2008 MTW Annual Plan formed the basis for finalizing the requirements of this protocol. Additional guidance with respect to this protocol was provided by Eugene Geritz, AHA's HUD-appointed MTW liaison.



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

Adopted by the Board of Commissioners  
June 16, 2004

*Revision 4*

Amended by the Board of Commissioners  
April 30, 2008

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# The Housing Authority of the City of Atlanta, Georgia

## *Statement of Corporate Policies Governing the Leasing and Residency of Assisted Apartments* Revision 4 <sup>1</sup>

<b>Preamble</b> .....	1
<b>Part I.</b>	
Introduction.....	2
Article One. Objective.....	2
Article Two. Management and Administration.....	2
Article Three. Moving to Work Annual Plan.....	2
Article Four. Applicability of Policies to Applicants and Residents .....	3
Article Five. Site-Based Waiting List Policy.....	3
Article Six. Fair Housing and Equal Opportunity.....	4
Article Seven. Reasonable Accommodation.....	4
Article Eight. Deconcentration of Poverty.....	5
Article Nine. Fraud and Misrepresentation .....	6
Article Ten. Private Sector Innovation .....	7
<b>Part II.</b>	
Applicant and Resident Suitability.....	7
Article One. Definitions of Family.....	7
Article Two. Determining Criteria.....	8
Article Three. Initial Leasing Considerations.....	9
Article Four. Applicant Selection Policies.....	10
Article Five. Order of Selection for UFAS-Accessible Units.....	14
Article Six. Screening of Applicants and Residents.....	18
Article Seven. Criminal History Screening.....	19
<b>Part III.</b>	
Resident Benefits and Opportunities.....	24
Article One. Rent, Individual Development Accounts, And Security Deposits.....	24
Article Two. Basic Lease Obligations and Responsibilities.....	28
Article Three. Occupancy, Charges and Allowances.....	31
Article Four. Transfers.....	32
Article Five. Individual Development Account (IDA) Program.....	34
Article Six. Pet Policy.....	35
Article Seven. Disputing Decisions of Manager.....	37
<b>Part IV.</b>	
Miscellaneous.....	38
Article One. Availability of Official Leasing Documents.....	38
Article Two. Special Program, Policy and/or Strategic Initiatives.....	39
Article Three. Response to Federally Declared Disasters and Other Federally Declared Emergencies.....	39
Article Three. Approval of Management Practices.....	40
Article Four. Revisions to the Statement of Corporate Policies .....	40

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<sup>1</sup> The *Statement of Corporate Policies Governing the Leasing and Residency of Assisted Apartments* (Statement of Corporate Policies) was originally adopted by the Board of Commissioners on June 16, 2004. The Board of Commissioners adopted amendments to the Statement of Corporate Policies on April 25, 2005, September 9, 2005, December 12, 2005 and April 25, 2007. The current Revision 4 is based on amendments adopted by the Board of Commissioners on April 30, 2008.

# **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 Operations 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 activities and demonstration programs, the implementation of those strategic initiatives, not immediately enumerated in Atlanta Housing Authority's Moving to Work (MTW) Annual Plan, may be advanced, provided such strategic initiatives are consistent with the Statement of Corporate Policies and the spirit and intent of the authorizations under the MTW Agreement.

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 Policies.



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 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).
3. 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.

#### ARTICLE EIGHT. 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 participation in other housing subsidy programs, income from all sources, 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 who is not elderly (62 years or older) or a person with a verifiable disability, other than an approved live-in-aide or a household member who is otherwise needed in the home as a reasonable accommodation to care for an elderly and/or disabled household member based on verifiable circumstances for a recognized period of time, must be in compliance with the qualifications outlined in Article Two and Article Four 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, including each other household member in an Elderly Family or Disabled Family, 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.

5. The application for admission 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.
6. 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 Non-Elderly Disabled Residents:
  - A. To be considered for a Community for Elderly, Almost-Elderly and/or Non-Elderly Disabled Residents, an Applicant must be a household whose head or spouse (if married) or sole member is:
    - (i) Elderly (62 years of age or older);
    - (ii) Almost Elderly (55-61 years of age); or
    - (iii) Non-Elderly Disabled (a person less than 62 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 Non-Elderly 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 four (4) Elderly and Almost Elderly Applicants to one (1) Non-Elderly Disabled Applicant 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 Non-Elderly 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 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, 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 Management Operating Procedures; and all other members of the household, including such other household members in an Elderly Family or Disabled Family, 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.

6

- 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).

ARTICLE FIVE. 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 accessibility 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 accessibility 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 required 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**

#### **ARTICLE ONE. 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 minimum rent requirement under such terms as the Management Agent shall direct. Such suspensions shall not last greater than ninety (90) days unless otherwise extended upon the written request of the Resident household based on verifiable circumstances reasonably affecting the Resident household's ability to pay the minimum rent. The period of the temporary suspension may be extended by the Management Agent after supervisory review and documented approval of the request;
  - ii. Accelerated enrollment in one of Atlanta Housing Authority's approved economic independence program components;
  - iii. Referral to third party agencies who assist residents with the payment of rent; and
  - iv. Such other actions as the Management Agent shall direct.
- D. The Resident household will not be required to pay minimum rent arrearages that accumulated during the entire period of an approved temporary suspension of the minimum rent as set forth in paragraph C above.



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 and 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 utility allowances by bedroom size for each community based on the reasonable rate of utility consumption by energy conservative households; and may, after considering the existing condition of a community, including the age of building infrastructures, amount of insulation, and air circulation, adjust such allowances to account for the utility consumption required to maintain a reasonable quality of life environment under such conditions.
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 ("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 and the proposed Heads-of-Household of the units to be assigned under the Split-Family Transfer must be: (a) listed on the existing Lease as a member of the household as of the most recent recertification; and (b) 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) INITIATIVE

Having eliminated the federal earned income disallowance for Residents paying an Income Adjusted Rent, Atlanta Housing Authority, in its discretion, may implement an IDA initiative which would promote and encourage personal economic independence among Residents through a monetary incentive program.

1. The IDA initiative would be linked to meaningful capacity-building initiatives offered by a variety of organizations and institutions in Atlanta.
2. A mechanism would be created for eligible Residents which would 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 IIDA.
3. To fulfill the eligibility requirements of the program, all Residents would be enrolled in the IDA initiative, and would be required to participate in a personal economic development program approved by Atlanta Housing Authority.
4. The IDA initiative would give Residents the opportunity to accumulate financial resources to assist in their transition off of subsidy assistance.
5. The IDA initiative incentive would require eligible Residents to participate successfully by obtaining employment and achieving other economic independence milestones established under an approved economic independence program.
6. As Residents achieve their individualized milestones, Atlanta Housing Authority would collect and defer a portion of the rents collected beyond the assessed carrying cost of the Assisted Apartment in an IDA fund.
7. Residents that achieve the self-sufficiency and economic independence milestones would be eligible for reimbursement of IDA funds. Those who do not achieve their milestones would not be eligible for the IDA initiative nor would they be eligible to receive a reimbursement of any portion of the funds in the IDA account.

## 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 animal" 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 any community with Assisted Apartments.

2. Official leasing-related documents can be reviewed by Applicants, Residents, and other interested parties upon reasonable request and notice during normal office hours.
3. 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]

## Appendix Q - Statement of Housing Choice Policies



### *Statement of Policies Governing the Housing Choice Tenant-Based Program*

First Adopted by the Board of Commissioners on August 25, 2004  
*As the Administrative Plan Governing the Housing Choice Voucher Program*

*Revision 6*

Amended by the Board of Commissioners  
April 30, 2008

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# The Housing Authority of the City Of Atlanta, Georgia

## *Statement of Policies Governing the Housing Choice Tenant-Based Program*

<b>Preamble.....</b>	<b>1</b>
<b>Part I.</b>	<b>Introduction.....2</b>
Article One.	Objective.....2
Article Two.	Program Management and Operating Procedures.....2
Article Three.	Moving To Work Demonstration Program.....2
Article Four.	Fair Housing and Equal Opportunity.....3
Article Five.	Fraud and Misrepresentation.....4
<b>Part II.</b>	<b>Admission to the Program.....4</b>
Article One.	Waiting List Notification.....4
Article Two.	Special Admissions.....5
Article Three.	Application.....6
Article Four.	Organization and Maintenance.....6
Article Five.	Selection to the Program ("Selection").....6
<b>Part III.</b>	<b>Eligibility.....8</b>
Article One.	Determination and Verification.....8
Article Two.	Participant Obligations and Responsibilities.....8
Article Three.	Suitability.....9
Article Four.	Ineligibility Determination.....9
<b>Part IV.</b>	<b>Rent.....9</b>
Article One.	Housing Affordability Policy.....9
Article Two.	Tenant Rent.....9
Article Three.	Utility Allowance Schedule.....10
Article Four.	Minimum Rent.....10
Article Five.	Elderly Income Disregard.....11
Article Six.	Standard Income Deductions and Treatment of Assets.....12
<b>Part V.</b>	<b>Subsidy Standards.....12</b>
Article One.	Voucher Size.....12
Article Two.	Effect of Live-In Aide on Voucher Size.....13
<b>Part VI.</b>	<b>Alignment of AHA Payment Standards with Market Rents.....13</b>
Article One.	MTW Authorization.....13
Article Two.	Setting Market Rents.....13
Article Three.	AHA Payment Standards.....14
Article Four.	Deconcentration.....15
<b>Part VI.</b>	<b>Voucher Issuance.....15</b>
Article One.	Family Briefings.....15
Article Two.	Term of Voucher Issuance.....16
Article Three.	Transfer of Assistance.....16

# The Housing Authority of the City Of Atlanta, Georgia

## *Statement of Policies Governing the Housing Choice Tenant-Based Program*

<b>Part VIII.</b>	<b>Inter-Jurisdictional Cooperation.....</b>	<b>16</b>
Article One.	Cooperative Agreements.....	16
Article Two.	Portability.....	16
<b>Part IX.</b>	<b>Inspections.....</b>	<b>17</b>
Article One.	Quality Units.....	17
Article Two.	Program Marketing and Outreach.....	17
Article Three.	Frequency of Inspections.....	18
<b>Part X.</b>	<b>Business Relationship Between Atlanta Housing Authority and Owners/Landlords.....</b>	<b>18</b>
Article One.	Business Relationship with Owners/Landlords.....	18
Article Two.	Business Relationships Program Procedures.....	18
<b>Part XI.</b>	<b>Reexaminations.....</b>	<b>18</b>
Article One.	Reexamination Policy.....	18
Article Two.	Reexamination Program Procedures.....	18
<b>Part XII.</b>	<b>Terminations.....</b>	<b>19</b>
Article One.	Lease Termination.....	19
Article Two.	Program Moves.....	19
Article Three.	Denial and Termination of Assistance.....	19
Article Four.	Other Terminations of HAP Contracts and Assistance.....	22
Article Five.	Termination of Assistance Notification.....	23
Article Six.	Informal Reviews and Informal Hearings.....	23
<b>Part XIII.</b>	<b>Special Programs.....</b>	<b>24</b>
Article One.	Special Programs Policy.....	24
<b>Part XIV.</b>	<b>Response to Federally Declared Disasters... ..</b>	<b>24</b>
Article One.	Agency-Wide Disaster and Other Emergency Relief Plans.....	24
<b>Part XV.</b>	<b>Project Based Rental Assistance.....</b>	<b>25</b>
Article One.	Project Based Rental Assistance Policy.....	25



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

## **Statement of Policies Governing the Housing Choice Tenant-Based Program**

### **PREAMBLE**

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

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

This Statement of Housing Choice Policies envisions and supports a Housing Choice Tenant-Based Program that is creative in design, effective in the development of procedures and processes, and nimble in the successful implementation of the program and related initiatives that enhance the quality of life of participating families, seniors and persons with disabilities. The Housing Choice Tenant-Based Program is a means for eligible participants to access quality housing in communities of opportunity and promote participant economic and lifestyle self-sufficiency.

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

Housing Choice policies were adopted by the Atlanta Housing Authority's Board of Commissioners on August 25, 2004. Five amendments to the plan have been approved subsequent to the initial date of adoption, whereupon this is the sixth amendment. This Statement of Housing Choice Policies supersedes all prior versions of Atlanta Housing Authority's Housing Choice administrative plan policies and has precedence over all administrative procedures and management practices that may be in conflict with it.

This Statement of Housing Choice Policies 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 those Policies.

## **PART I - INTRODUCTION**

### **ARTICLE ONE. OBJECTIVE**

This Statement of Housing Choice Policies is Atlanta Housing Authority's policy document for the Housing Choice Tenant-Based Program ("Program") in support of Atlanta Housing Authority's Vision of Healthy Mixed-Income Communities.

### **ARTICLE TWO. PROGRAM MANAGEMENT AND OPERATING PROCEDURES**

1. The Operations Division performs all program management functions related to the implementation and administration of the Program. The Operations Division is responsible for developing and implementing written Program operating procedures ("Operating Procedures") that are consistent with the policies outlined in this Statement of Housing Choice Policies.
2. The Operations Division may create and apply technology solutions to improve the efficiency and effectiveness of applicable program management functions in order to create, where appropriate and practical, a paperless environment. The Operations Division will include the requirements, procedures and processes for the implementation and administration of technology solutions and concomitant applications in the Operating Procedures.

### **ARTICLE THREE. MOVING TO WORK DEMONSTRATION PROGRAM**

1. As a Moving to Work 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 strategic initiatives may be immediate, progressive, or refined through various activities and demonstration programs, the implementation of those strategic initiatives, not immediately enumerated in Atlanta Housing Authority's Moving to Work (MTW) Annual Plan, may be advanced, provided such strategic initiatives are consistent with the Statement of Housing Choice Policies and the spirit and intent of the authorizations under the MTW Agreement.

3. Administrative procedures, processes and general management practices for new strategic initiatives shall be developed following the intent of this Statement of Housing Choice Policies and may be amended from time to time at the discretion of Atlanta Housing Authority.
4. 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 Housing Choice 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 Housing Choice Policies does not alter, change, or modify the original intent of any policy. Any other alterations, changes, and modifications to any policy in this Statement of Housing Choice Policies must be approved by the Board of Commissioners.

#### 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 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 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.

4. Atlanta Housing Authority shall assist Applicants and Participants with disabilities in accordance with such federal laws, rules and regulations that are applicable to the administration of the Program with respect to application procedures, ongoing program participation, and procedures related to the acceptance, processing and disposition of reasonable accommodation requests.

## 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 Statement of Housing Choice Policies and implemented through the Operating Procedures.
2. Applicants and Participants are required to provide truthful, complete information relating to participation in other housing subsidy programs, income from all sources, family composition, and all family background information to qualify for initial eligibility and continued participation in the Program.
3. Applicants and Participants who engage in acts of fraud and misrepresentation are subject to loss of 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 - ADMISSION TO THE PROGRAM**

### ARTICLE ONE.      WAITING LIST NOTIFICATION

1. Atlanta Housing Authority will comply with all Fair Housing and Equal Opportunity requirements applicable to public notices announcing the opening and closing of the Program waiting list ("Waiting List") for a Housing Choice Tenant-Based Voucher ("Voucher").

2. Atlanta Housing Authority will make reasonable efforts to provide adequate notification to potential applicants with respect to applicant eligibility, the period of the opening, reasonable accommodations needs and other details related to the acceptance of applications to the Waiting List as set forth in the Operating Procedures.

## ARTICLE TWO. SPECIAL ADMISSIONS

1. Atlanta Housing Authority may accept applications from eligible households who have relocated from a community owned by Atlanta Housing Authority due to demolition, repositioning, disposition or other related Atlanta Housing Authority activities without opening the Waiting List.
2. Atlanta Housing Authority, in its discretion, may authorize the special admission of eligible and qualified applicants to the Program, in order to implement special initiatives; offer homeownership opportunities to eligible households; admit households impacted by an owner opt-out of a housing assistance contract on a HUD-insured multi-family development; address an urgent local need as determined and approved by Atlanta Housing Authority including, but not limited to, foreclosure assistance and natural disasters; or provide relocation and/or transfer assistance to an eligible and qualified person with a verifiable disability who resides in an Atlanta Housing Authority-owned community or whose name is on a transfer/waiting list to be assisted under any Atlanta Housing Authority housing program as a reasonable accommodation.
3. Any household eligible for a special admission under this Article Two will not be denied a Voucher for admission to the Housing Choice Program provided that no member of the household has committed an offense specifically identified by HUD pursuant to 24 CFR 982.353 as described in Part XII, Article Three, paragraph 2 of this Statement of Housing Choice Policies. Atlanta Housing Authority, in its discretion, may deny special admission to a household if any member of the household has committed a violent offense as described in Part XII, Article Three, paragraph 3 of this Statement of Housing Choice Policies.
4. Procedures, processes and general management practices for special admissions are outlined in the Operating Procedures.

### ARTICLE THREE. APPLICATION

The application process and administrative procedures for placing Applicants on the Waiting List and determining eligibility and qualification for selection and program participation are set forth in the Operating Procedures.

### ARTICLE FOUR. ORGANIZATION AND MAINTENANCE

1. The equitable methods of ranking Applicants on the Waiting List and the processes for organizing, updating and maintaining Applicant records are set forth in the Operating Procedures.
2. The maintenance of the Waiting List with respect to updating applications, notice letters, and purges is detailed in the Operating Procedures.
3. Applicant responsibilities and requirements for updating changes to the information reported during the application process and for responding to requests for information are stated in the Operating Procedures.

### ARTICLE FIVE. SELECTION TO THE PROGRAM ("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 who is not elderly (62 years or older) or a person with a verifiable disability, other than an approved live-in-aide or a household member who is otherwise needed in the home as a reasonable accommodation to care for an elderly and/or disabled household member based on verifiable circumstances for a recognized period of time, must be in compliance with the qualifications outlined in this Article Five.

## 2. Selection Qualifications.

Provided the Applicant household is not an Elderly Family or a Disabled Family, 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 Operating Procedures; and all other members of the household, including such other household members in an Elderly Family or Disabled Family, 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 Atlanta Housing Authority 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 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 thirty (30) hours per week for employment and education/training;
- D. Elderly; or
- E. Disabled.

## 3. General Considerations for Selection

- 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 Selection 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 be responsible for the entire Total Tenant Payment based on prior employment status.

- B. The provision in the preceding paragraph 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.
- C. To be eligible for Selection in accordance with this Article, an Applicant's qualifications for Selection as a Participant must be verified through appropriate documentation as set forth in the Operating Procedures

### **PART III - ELIGIBILITY**

#### **ARTICLE ONE. DETERMINATION AND VERIFICATION**

An Applicant desiring to participate in the Program must complete a full application in accordance with the Operating Procedures and 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 HUD rules and regulations and this Statement of Housing Choice Policies; (b) Applicant fully satisfies HUD's statutory and regulatory requirements for citizenship and/or eligible immigrant status; (c) Applicant is in compliance with the qualifications outlined in Part II, Article Five; (d) Applicant would be a suitable Participant based on past satisfactory behavior including, but not limited to, an acceptable criminal background record; and (e) Applicant is able to comply with all Program obligations.

#### **ARTICLE TWO. PARTICIPANT OBLIGATIONS AND RESPONSIBILITIES**

1. Participants must occupy their assisted unit as their sole place of residence and conduct themselves in an acceptable and responsible manner that would not adversely impact the quiet and peaceful enjoyment of the premises and neighborhood by other community residents.
2. Participants must meet all obligations set forth in this Statement of Housing Choice Policies as implemented through the Operating Procedures, including, but not limited to those obligations relating to housekeeping, other health and safety concerns, criminal activity prohibitions, and economic independence initiatives.



### ARTICLE THREE. SUITABILITY

Atlanta Housing Authority determines Participant eligibility for the Program in accordance with the Operating Procedures but does not otherwise screen Participants as to their suitability as tenants. It is the rental property owner's (Owner/Landlord) responsibility to screen the suitability and acceptability of Participants as prospective tenants using their screening criteria in compliance with the Fair Housing Act.

### 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. HOUSING AFFORDABILITY POLICY

In order to preserve housing affordability for Participants of the Program, each Participant, unless subject to the minimum rent established by Atlanta Housing Authority, will pay no more than 30% of the household's monthly adjusted income for rent and utilities and other services ("Total Tenant Payment").

### ARTICLE TWO. TENANT RENT

The rent payable to the Owner/Landlord by the Participant is the Tenant Rent. The Tenant Rent will be equal to the Total Tenant Payment unless the Total Tenant Payment has been reduced by an allowance for any utility or service for which the Participant has full financial responsibility pursuant to the lease agreement between the Participant and Owner/Landlord. Determinations of the Total Tenant Payment and Tenant Rent will be in accordance with the Operating Procedures.

### ARTICLE THREE. UTILITY ALLOWANCE SCHEDULE

The schedule of utilities and other services ("Utility Allowance Schedule") used in calculating Tenant Rent will be analyzed on a periodic and ongoing basis in order to identify any fluctuations and trends in the cost of utilities and services within Atlanta Housing Authority's jurisdiction. If such analysis reveals an extraordinary increase in the cost of utilities and services that will have a discernible impact on Participants, Atlanta Housing Authority will revise the Utility Allowance Schedule and implement it within a reasonable time frame in order to preserve housing affordability for Participants. Such ongoing analysis notwithstanding, Atlanta Housing Authority will conduct a comprehensive review of the cost of utilities and services on an annual basis and issue a Utility Allowance Schedule each calendar year in accordance with the Operating Procedures.

### ARTICLE FOUR. 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 unless otherwise extended upon the written request of the Participant household based on verifiable circumstances reasonably affecting the Participant household's ability to pay the minimum rent. The period of the temporary suspension may be extended by the Atlanta Housing Authority after supervisory review and documented approval of the request;
  - ii. Accelerated enrollment in one of Atlanta Housing Authority's approved economic independence program components;
  - iii. Referral to third party agencies who assist participants with the payment of rent; and
  - iv. Such other actions as Atlanta Housing Authority shall direct.
- C. The Participant household will not be required to pay minimum rent arrearages that accumulated during the entire period of an approved temporary suspension of the minimum rent as set forth in paragraph B above.

#### ARTICLE FIVE.

#### 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 SIX.

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.

VOUCHER SIZE

1. The size of the rental housing unit that a Participant may lease under the Program is based on the number of bedrooms Atlanta Housing Authority has approved for the Participant's Voucher ("Voucher Size").
2. A Participant may not lease a rental housing unit that has more bedrooms than the Voucher Size unless approved by Atlanta Housing Authority. In the event Atlanta Housing Authority approves a Participant's request for a change in the Voucher Size, a new Voucher with the approved Voucher Size will be issued to the Participant.
3. To avoid overcrowding and the conditions that may arise from overcrowding, the Voucher Size of the Voucher issued to each eligible Participant will be determined in accordance with Operating Procedures based on the verifiable needs of the Participant household. A variety of factors, including, but not limited to, the number of people in the household, the age and gender of household members, special needs and reasonable accommodations requests, will be considered in determining Voucher Size.

ARTICLE TWO.      EFFECT OF LIVE-IN AIDE ON VOUCHER SIZE

One additional bedroom may be added to increase the Voucher Size when it is determined that a Live-in Aide that is essential for the care and support of an elderly or disabled Participant or household member will reside in the assisted unit with the elderly or disabled Participant or household member, but only after the need for a Live-In Aide has been certified by a medical professional and approved by Atlanta Housing Authority in accordance with the Operating Procedures.

**PART VI - ALIGNMENT OF AHA PAYMENT STANDARDS  
WITH MARKET RENTS**

ARTICLE ONE.      MTW AUTHORIZATION

1. The MTW Agreement recognizes the spirit and intent of Atlanta Housing Authority's overarching goal of being a superior provider of affordable housing that will expand, improve and diversify Atlanta Housing Authority's influence on the affordable housing market and promote and support Participant self sufficiency.
2. In establishing Atlanta Housing Authority's Housing Choice Tenant-Based Program, the provisions of the MTW Agreement authorize Atlanta Housing Authority to determine reasonable contract rents and increases to such rents, rent reasonableness methodologies and adjustments to the payment standards.
3. Atlanta Housing Authority, in its discretion and pursuant to the MTW authorizations as summarized in this Article One, may explore, establish and implement different rent structures to further align the Program with private sector practices as well as to maximize the use of the subsidy resource to promote and support economic independence among Program Participants.

ARTICLE TWO.      SETTING MARKET RENTS

1. Methodologies for setting market rents 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.

2. Atlanta Housing Authority will utilize market practices and other recognized methods for establishing market rent standards (“AHA Payment Standards”) in order to determine the market contract rents that will be paid to Owners/Landlords. These standards will be used in place of the Fair Market Rents published annually in the Federal Register and will be used as the basis for establishing reasonable contact rents

### ARTICLE THREE. AHA PAYMENT STANDARDS

1. AHA Payment Standards will be consistent with the objectives and determinations for setting market rents outlined in this Part VI with respect to aligning the Program with private sector practices and maximizing the use of the subsidy resource in support of strategies that promote the deconcentration of poverty and broader opportunities, enhance opportunities for the development of affordable housing, provide reasonable accommodation for disabled and elderly Participants, and provide for the sustainability of the Program.
2. Atlanta Housing Authority, in its discretion, will establish, implement and publish a Schedule of AHA Payment Standards for each submarket area within its jurisdiction or a Schedule of Payment Standards applicable to a broader area in support of portability initiatives.
3. Atlanta Housing Authority, in its discretion, may amend the AHA Payment Standards based on changing market conditions.
4. The procedures for implementing the AHA Payment Standards will be outlined in the Operating Procedures.
5. Exceptions to the AHA Payment Standards may be granted on a case-by-case basis with director-level or above approval based on the quality of the housing regardless of submarket, the location of the housing with respect to its proximity to revitalization activities, a reasonable accommodation request, and other reasonable requests related to achieving Atlanta Housing Authority’s goals. The procedures for granting exceptions will be included in the Operating Procedures.

## ARTICLE FOUR.    DECONCENTRATION

1. Atlanta Housing Authority's policies regarding AHA Payment Standards and Setting Market Rents support effective strategies for the deconcentration of poverty by providing Participants with meaningful and broader housing opportunities in accessing quality affordable housing.
2. Atlanta Housing Authority has an established policy that no more than forty percent (40%) of the units in a multifamily community will be assisted under Section 8 and/or Section 9 of the United States Housing Act of 1937, as amended, unless (i) the multifamily community has been designated as housing for Elderly Families and/or Disabled Families; or (ii) the multifamily community was built or substantially rehabilitated for occupancy by Elderly Families and/or Disabled Families.
3. Atlanta Housing Authority has an established policy that up to 100% of the units may be assisted under Section 8 and/or Section 9 of the United States Housing Act of 1937, as amended, in a multifamily community that has been designated as housing for Elderly Families and/or Disabled Families or was built or substantially rehabilitated for occupancy by Elderly Families and/or Disabled Families.
4. Atlanta Housing Authority, in its discretion, may develop a deconcentration strategy that would limit the percentage of Program Participants in designated census tracts in the City of Atlanta with the goal and intent of limiting occupancy in areas with high poverty concentrations.

## **PART VII - VOUCHER ISSUANCE**

### ARTICLE ONE.    FAMILY BRIEFINGS

Applicants and Participants are required to attend an information briefing in order to receive a Voucher. The purpose of the briefing is to inform and educate Applicants and Participants regarding Program procedures, obligations and housing opportunities. The briefing will be conducted in accordance with the Operating Procedures.

## ARTICLE TWO.      TERM OF VOUCHER ISSUANCE

Vouchers are issued to Applicants and Participants for a reasonable period of time in accordance with the Operating Procedures. Extensions to the term of the Voucher may be granted on a case-by-case basis with director-level or above approval based on relocation activities, reasonable accommodation requests, and other reasonable requests related to an Atlanta Housing Authority special or strategic initiative. The procedures for granting extensions will be included in the Operating Procedures.

## ARTICLE THREE.      TRANSFER OF ASSISTANCE

1. An Applicant or Participant cannot transfer her/his Voucher to another person or family. There is no expressed nor implied right that permits or entitles the selective transfer of a Voucher that was issued to an Applicant or Participant for her/his exclusive use as head-of-household on behalf of an assisted household.
2. If the Voucher holder, as the head-of-household of a housing unit assisted under the 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 Operating Procedures.

## **PART VIII - INTER-JURISDICTIONAL COOPERATION**

### ARTICLE ONE.      COOPERATIVE AGREEMENTS

Atlanta Housing Authority will seek to establish cooperative agreements and similar arrangements between and among other housing agencies in other jurisdictions administering the Housing Choice Tenant-Based Program with respect to Voucher portability relating to eligibility, inspections, program requirements, fee sharing, billing and other arrangements that would promote and benefit inter-jurisdictional cooperation.

### ARTICLE TWO.      PORTABILITY

1. Voucher portability procedures, processes and general administrative practices are set forth in the Operating Procedures.
2. Voucher portability will generally follow the applicable HUD rules and regulations unless modified by an inter-jurisdictional cooperative agreement and applicable authorizations under Atlanta Housing Authority's MTW Agreement.



3. Atlanta Housing Authority will require Participants porting to other jurisdictions to comply with Atlanta Housing Authority's CATALYST requirements, including the work requirement, including the training and program participation components. Atlanta Housing Authority may, at its discretion, waive such requirements for Participants where Atlanta Housing Authority determines that it is not feasible to administer program compliance for such Participants.

## **PART IX - INSPECTIONS**

### ARTICLE ONE.      QUALITY UNITS

1. Atlanta Housing Authority established and may amend enhanced local standards ("AHA Local Inspection Standards") periodically to ensure that assisted units offer Participants quality housing in healthy communities. 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 Program. It is the goal of the Program to provide opportunities for all Participants to reside in units in neighborhoods that promote and enhance 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 Program. Conversely, it is also the policy of Atlanta Housing Authority to disapprove marginal housing units for participation in the Program.

### ARTICLE TWO.      PROGRAM MARKETING AND OUTREACH

Atlanta Housing Authority will continue to educate the public about the 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 Program participants. This effort includes outreach activities to Owners/Landlords with quality housing units.

### ARTICLE THREE. FREQUENCY OF INSPECTIONS

To ensure ongoing compliance with the AHA Local Inspection Standards, Atlanta Housing Authority will inspect all units assisted under the Program prior to occupancy, annually and under special circumstances related to health and safety issues and quality assurance measures in accordance with the procedures, processes and general administrative practices set forth in the Operating Procedures.

## **PART X – BUSINESS RELATIONSHIP BETWEEN ATLANTA HOUSING AUTHORITY AND OWNERS/LANDLORDS**

### ARTICLE ONE. BUSINESS RELATIONSHIP WITH OWNERS/LANDLORDS

The Housing Assistance Payments Contract or any successor agreement that Atlanta Housing Authority may develop and implement pursuant to its authorizations under the MTW Agreement is the controlling agreement that defines the business relationship between Atlanta Housing Authority and Owners/Landlords.

### ARTICLE TWO. BUSINESS RELATIONSHIP PROGRAM PROCEDURES

Atlanta Housing Authority's Program procedures governing the conduct of the business relationship between Atlanta Housing Authority and Owners/Landlords are set forth in various written communications and guidelines as set forth and directed by the Operating Procedures.

## **PART XI – REEXAMINATIONS**

### ARTICLE ONE. REEXAMINATION POLICY

Atlanta Housing Authority will reexamine the income, family composition and program compliance of each Participant on a periodic basis in accordance with the authorizations under the MTW Agreement and as set forth in the Operating Procedures.

### ARTICLE TWO. REEXAMINATION PROGRAM PROCEDURES

Atlanta Housing Authority's Program procedures governing the conduct of reexaminations and Participant obligations and responsibilities are set forth in various written communications and guidelines as set forth and directed by the Operating Procedures.

## **PART XII - TERMINATIONS**

### **ARTICLE ONE. LEASE TERMINATION**

Procedures, processes and general administrative guidelines governing lease terminations and the resulting termination of the Housing Assistance Payments Contract are set forth in the Operating Procedures.

### **ARTICLE TWO. PROGRAM MOVE**

A Participant may give written notice to move from a unit assisted under the Program pursuant to the terms of the lease between the Participant and the Owner/Landlord and the Participant's obligations under the Program ("Program Move"). The procedures, processes and general administrative guidelines governing Program Moves are set forth in the Operating Procedures. Atlanta Housing Authority may initiate a Program Move due to Owner/Landlord non-compliance with Program requirements; requests for reasonable accommodations; victim protection under the Violence Against Women Act; relocation activities or for other strategic reasons set forth in the Operating Procedures.

### **ARTICLE THREE. 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 household 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 APPLICABLE  
TO 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 Program.
- B. An Applicant or household member, either of whom being a former 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 this Statement of Housing Choice Policies.

ARTICLE FOUR. OTHER TERMINATIONS OF HOUSING ASSISTNACE  
PAYMENTS CONTRACTS AND PARTICIPANT ASSISTANCE

- 1. Atlanta Housing Authority may terminate a Housing Assistance Payments Contract if the Owner/Landlord is not in compliance with the terms and conditions of the Housing Assistance Payments Contract.
- 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 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 FIVE.

#### 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 written termination notices in accordance with the Operating Procedures.

#### ARTICLE SIX.

#### INFORMAL REVIEWS AND 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 POLICY**

Atlanta Housing Authority, in its discretion, and as a policy matter may develop special programs and initiatives utilizing the regulatory relief and authorizations granted Atlanta Housing Authority under the MTW Agreement that address an identified need and support Atlanta Housing Authority's Vision, Mission and Guiding Principles.

## **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 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 Program related to intake procedures including but not limited to establishing a preference for disaster victims on waiting lists for the 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 RENTAL ASSISTANCE**

### **ARTICLE ONE. PROJECT BASED RENTAL ASSISTANCE POLICY**

Project-Based Rental Assistance, a major business plan priority of Atlanta Housing Authority, was developed pursuant to MTW authorizations for project-basing housing assistance under Section 8 of the 1937 Housing Act, as amended.

1. Project Based Rental Assistance, as a business plan component, is administered independent of and separate from the Housing Choice Tenant-Based Voucher Program.
2. Atlanta Housing Authority will not enter into Housing Assistance Payments Contracts for Housing Choice Tenant-Based Vouchers in a property that is under an executed Project Based Rental Assistance Agreement or a written commitment to enter into a Project Based Rental Assistance Agreement.
3. The implementation and administration of Project Based Rental Assistance, including site-based administration of all program activities by the owner entity's professional management agent, are set forth in separate operating procedures for Project Based Rental Assistance.

**END**

## Appendix R: 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 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. 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 Tuesday, April 15, 2008, 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* (now referred to as the Statement of Policies Governing the Housing Choice Tenant-Based Program) and to receive comments from residents, participants, and the general public. The Public Hearing was held at the Loudermilk Conference Center, 40 Courtland Avenue, Atlanta, Georgia, where approximately 200 individuals attended. Notice of the FY 2009 Annual Plan availability and Public Hearing was posted in the following newspaper publications on the following dates:

- Atlanta Journal Constitution
  - March 9, 2008
  - April 6, 2008
- Atlanta Voice
  - March 13, 2008
  - April 10, 2008
- The Atlanta Latino
  - March 13, 2008
  - April 10, 2008
- The Atlanta Daily Word
  - March 13, 2008
- Fulton County Daily Report
  - March 11, 2008
- Mundo Hispanico
  - March 13, 2008
  - April 10, 2008

In addition, AHA mailed a letter of notification to all AHA-assisted families informing them of the Annual Plan availability and public hearing and offered public transportation reimbursement (or transportation assistance for reasonable accommodation requests) to attend the public hearing. Every AHA Affordable Community posted the notice in the management office where it could be easily viewed by residents. The public hearing notice was also developed and made available in a number of formats: English, Mandarin, German, Russian, Spanish and Korean.

Valuable comments and dialogue were communicated at the consultation meetings and public hearing. AHA has considered, appropriately addressed or responded to remarks or questions regarding 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.”

## **Appendix S: Submissions Required for Receipt of Funds**

HUD no longer requires a submission from AHA to request Housing Choice funds and AHA is currently in the process of completing the 2008 Low Rent Operating Subsidy Calculation which will be submitted electronically per HUD guidance. AHA cannot submit a request for Capital Fund Program (CFP) funds since HUD has not yet released the amount of the 2008 grant award. AHA will submit the required amendments to the CFP Annual Contributions Contract (ACC) and Performance and Evaluation reports to HUD as soon as HUD provides the funding levels.

**EXHIBIT 1**  
**RESOLUTION ADOPTED AT THE REGULAR MEETING**  
**OF THE BOARD OF COMMISSIONERS HELD ON**  
**WEDNESDAY, APRIL 30, 2008**

---

**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, unless further extended;

**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 U. S. 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 implementation plan or Fiscal Year 2009 (FY 2009) CATALYST Implementation Plan for the fiscal year beginning July 1, 2008;

**WHEREAS**, the FY 2009 CATALYST Implementation Plan identifies AHA's priorities and projects for FY 2009 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 2009;

**WHEREAS**, during FY 2009, 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 2009 are described in more detail in the attached Exhibit EO-1-A;

**WHEREAS**, AHA's FY 2009 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 15, 2008; and

**WHEREAS**, AHA is now requesting the Board of Commissioners to approve its FY 2009 CATALYST Implementation Plan and authorize the submission of its FY 2009 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 2009 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 2009 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 2009 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 2009 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 2009 CATALYST Implementation Plan.
6. The President and Chief Executive Officer is hereby authorized to carry out other actions relating to the FY 2009 CATALYST Implementation Plan all without the further vote or approval of this Board.

## 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 the resolution authorizing The Housing Authority of the City of Atlanta, Georgia (AHA) to submit its FY 2009 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 30, 2008 (the "Meeting").
4. The following Board members were present for the Meeting:  
  
Cecil Phillips, Chair  
Elder James Brown, Vice Chair  
Justine Boyd  
Aaron Watson
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 2nd day of May, 2008.



A handwritten signature in blue ink, appearing to read "Renée Lewis Glover", is written over a horizontal line.

**RENÉE LEWIS GLOVER,**  
Secretary



**Exhibit EO-1-A**  
**Atlanta Housing Authority (AHA)**  
**FY 2009 CATALYST Activities Directory**

Supporting Activity Name	Former Activity Name(s), If Applicable	FY 2009 Activity Description	Status*	FY 2008	FY 2009
<b>Revitalization Program</b>					
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 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.	<b>I</b>	√	√
Comprehensive Homeownership Program	Core Activity: Homeownership Program  Homeownership Standards	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.	<b>I</b>	√	√
<b>Quality of Life Initiative</b>					
Quality of Life Initiative		The Quality of Life Initiative (QLI) allows families in AHA's remaining conventional public housing developments 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.	<b>I</b>	√	√
Responsible Relocation	Enhanced Relocation Process  Enhanced Relocation Process and Database Enhancement	Responsible relocation will facilitate 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 families.	<b>I</b>	√	√
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 2009.	<b>I</b>	√	√





**Exhibit EO-1-A**  
**Atlanta Housing Authority (AHA)**  
**FY 2009 CATALYST Activities Directory**

Supporting Activity Name	Former Activity Name(s), If Applicable	FY 2009 Activity Description	Status*	FY 2008	FY 2009
Human Development and Support Services	Human Services Management Client Services	During FY 2009, AHA will continue connecting families to Human Development and Support Services to support 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 which will begin prior to families being relocated.	<b>I</b>	√	√
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.	<b>I</b>	√	√
Enhanced Housing Marketing		During FY 2009, AHA will continue pursuing opportunities to partner with property owners and real estate agents to assist relocated families in finding quality housing. Key strategies include: (1) developing strategic partnerships with real estate agents, real estate investors, and multifamily apartment owners to engage them in assisting residents to locate housing; (2) aggressively soliciting property owners/landlords in low poverty areas in making quality units available to residents; and (3) conducting housing tours and fairs.	<b>I</b>	√	√
Leasing Incentive Fees		AHA established Leasing Incentive Fees (LIF) as a deconcentration strategy and a means to encourage landlords and property owners in the private market to lease available housing to AHA-assisted families impacted by relocation. The LIF is a one-time non-refundable fee payable to housing providers participating in AHA's Housing Choice Program for both tenant based and project based rental assisted housing.	<b>I</b>	√	√
Pre-Relocation Client Education		During FY 2009 AHA will provide a variety of educational seminars to families in advance of relocation efforts to include training on the Housing Choice Voucher program and utility seminars to educate families on conservation and managing their budgets.	<b>I</b>		√



**Exhibit EO-1-A**  
**Atlanta Housing Authority (AHA)**  
**FY 2009 CATALYST Activities Directory**

Supporting Activity Name	Former Activity Name(s), If Applicable	FY 2009 Activity Description	Status*	FY 2008	FY 2009
<b>Project Based Rental Assistance as a Development Tool</b>					
Project Based Rental Assistance as a Development Tool	Partnering in Private Development Deals (Project-Based Procurement)	AHA will continue to use Project Based Rental Assistance with the goals of (a) facilitating housing opportunities for families in healthy mixed-income communities; (b) facilitating the development of housing for the elderly; (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.	<b>I</b>	√	√
Developing Alternative and Supportive Housing Resources		During FY 2009, AHA will continue to implement initiatives toward developing alternative and supportive housing resources for income eligible families. This includes the renovation of John O. Chiles into mixed-income elderly housing and the revitalization of John O. Chiles Annex as disabled only supportive housing.	<b>I</b>	√	√
Project Based Rental Assistance Regional Expansion Program		In its continued efforts to increase the quality and choice of the housing stock available to Housing Choice participants, AHA will negotiate Intergovernmental Agreements with various PHAs or local governments 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.	<b>I</b>	√	√
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 and is implementing a Homeless Demonstration Program in collaboration with United Way of Metropolitan Atlanta, Inc. The program offers Project Based Rental Assistance to private developers for existing rehabilitations, and/or new construction of housing with supportive services for persons with mental health disabilities. During FY 2009, proposals will be solicited from private developers that provide housing and support services targeting the chronically homeless population.	<b>I</b>	√	√



**Exhibit EO-1-A**  
**Atlanta Housing Authority (AHA)**  
**FY 2009 CATALYST Activities Directory**

Supporting Activity Name	Former Activity Name(s), If Applicable	FY 2009 Activity Description	Status*	FY 2008	FY 2009
Project Based Rental Assistance Mental Health Demonstration	Developing Alternative and Supportive Housing	AHA will continue 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.	<b>I</b>	√	√
Affordable Assisted Living Demonstration	Development of Affordable Assisted Living  Developing Alternative and Supportive Housing Resources	AHA explored strategies for developing affordable assisted living opportunities for low-income seniors and for disabled persons. These strategies included examining 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. <b>Due to the enormous complexity of Georgia's Medicaid system and the extensive financial and human resources that will be required to move this endeavor forward, this activity will be postponed during FY 2009.</b>	<b>PP</b>	√	<b>PP</b>
<b>Re-engineering Housing Choice Operations</b>					
Re-engineering Housing Choice Operations		As part of its operational re-engineering, Housing Choice will realign its core functional work activity in three primary services areas: <b>(1) Participant Services; (2) Landlord Services; and (3) Program Support.</b> By utilizing this approach in FY 2009, Housing Choice will foster a more customer-centric focus in the service delivery units and improve cross functional collaboration both within Housing Choice and other AHA departments.	<b>I</b>	√	√
Subcategory 1. Participant Services		As part of the customer-focused tenant voucher program, participant services group will administer the full life cycle of functions from waitlist administration and processing, to intake and eligibility screening, voucher generation and briefing, management of program moves, portability transactions, annual recertification, and participant hearings and terminations.			



**Exhibit EO-1-A**  
**Atlanta Housing Authority (AHA)**  
**FY 2009 CATALYST Activities Directory**

Supporting Activity Name	Former Activity Name(s), If Applicable	FY 2009 Activity Description	Status*	FY 2008	FY 2009
Intake/Waitlist Re-engineering		Housing Choice recently undertook the review and purging of the waitlist to create a “ready state” pool of about 6,000 applicants that have confirmed their interest in remaining on the waitlist and meeting CATALYST eligibility requirements should the waitlist open. Additionally, this “ready state” waitlist data is being fully automated in AHA’s Next Generation information system, which will facilitate easy access to applicant information at the primary customer touch points, including AHA’s contact center operators and the HC customer service desk.	<b>I</b>	√	√
Program Moves	Residential Moves	In recent years, the destabilizing influence of the excessive number of participant moves occurring with less than one year of tenancy led AHA to initiate a minimum two-year tenancy requirement in FY07/08. This strategy has been successful at reducing the volume of program moves by 50%, however, during FY 2009 AHA will continue to view multi-year tenancy as a goal, but not as defined family requirement. AHA will do a total file review and engage in detailed discussions with the family about their individual circumstances and family needs as an approach to enhance family stability and success.	<b>I</b>	√	√
Automated Outbound Portability Billing	Outbound Portability Initiative	During FY 2009 AHA will continue working with metro Atlanta public housing authorities that receive 95% of AHA outbound ports to create a more streamlined system for administrative processing of these inter-agency transactions. Under this model, AHA will focus on its role as an asset manager of voucher funds and continue to leave participant interface and case management duties to the receiving agency. During FY 2009, AHA and the receiving agencies will explore and implement strategies to assist with the cost and operational burden of any surges in relocation activity.	<b>I</b>	√	√



**Exhibit EO-1-A**  
**Atlanta Housing Authority (AHA)**  
**FY 2009 CATALYST Activities Directory**

Supporting Activity Name	Former Activity Name(s), If Applicable	FY 2009 Activity Description	Status*	FY 2008	FY 2009
Annual Re-certification Re-engineering		<p>As part of AHA's customer focused changes in FY 2009, participants will be interviewed 120 days prior to their lease expiration date rather than 60 - 90 days as in FY 2008. In addition, AHA recertification time cycle for senior citizens on a fixed income will continue on a bi-annual basis along with the initiation of a "by mail" recertification process for HC participants with disabilities or seniors with limited ability to come to the AHA corporate office.</p> <p>Further, during FY 2009, AHA will limit interim recertification activity only to households where an income change has created a negative financial burden for the family.</p>	<b>I</b>	√	√
Enhanced Business Systems (Family Obligations Document Enforcement, Enhanced Criminal Screening, and Health and Safety Standards		AHA will continue to enhance the business processes associated with enforcing CATALYST policies and family obligations to include: (1) Streamlining the work program compliance review process and engaging a vendor to expedite the criminal background screening process; (2) Coordinating between Housing Choice and Resident Services to ensure that the needs of participants with disabilities or disabled family members are being met with reasonable accommodations for their circumstances; (3) Utilizing processes to expedite responses to support participants under events of emergency or personal safety, such as foreclosures, natural disasters or Violence Against Women Act (VAWA) issues.	<b>I</b>	√	√
Automated Hearing Database		To improve efficiency, timeliness and objectivity in the participant hearing process, AHA developed a tracking system in its Oracle database. This system has improved the scheduling, processing and disposition of "hearings" significantly reducing the time required. AHA incorporated the use of this system in its routine operations in FY 2008 and will continue to utilize the system during FY 2009.	<b>I</b>	√	√



**Exhibit EO-1-A**  
**Atlanta Housing Authority (AHA)**  
**FY 2009 CATALYST Activities Directory**

Supporting Activity Name	Former Activity Name(s), If Applicable	FY 2009 Activity Description	Status*	FY 2008	FY 2009
Subcategory 2. Landlord Services		In support of AHA's agency wide implementation of the Quality of Life Initiative, Housing Choice is expanding the scope and breadth of its landlord services function to enhance relations with prospective and current owners/landlords who interface with the tenant voucher program. The landlord services group will be responsible for the complete life cycle of services, beginning with landlord marketing and outreach and continuing with landlord relations and training, landlord applications, requests for tenancy approval processing, QLI / relocation interface, rent determinations and adjustments, HAP contract development and administration, and landlord terminations.			
Place-based and People-based Deconcentration Strategy including Fair Market Rent Standards and Rent Reasonableness System	Deconcentration Plan Deconcentration Strategy Automated Rent Reasonableness System Housing Choice Fair Market Rents Housing Choice Landlord Certification and Training	<p>During FY 2009, AHA will use its new rent payment standard to encourage participation from owners/landlords in non-traditional areas and enhance opportunities for families to locate in lower-poverty neighborhoods. With respect to Housing Choice Rent Reasonableness, AHA will utilize the AHA Payment Standard to ensure that the agreed upon contract rent is reasonable and competitive with current market rents in the various Atlanta sub-markets.</p> <p>Housing Choice is also developing strategies to nurture and enhance landlord relationships to include landlord training and communication, additional resources and information on the landlord portal, and the hosting of landlord town hall sessions to serve as a feedback loop from external partners to HC management. AHA will continue to perform due diligence credit history reviews on landlords and may also elect to add criminal history screening to AHA's landlord due diligence process.</p>	I	√	√



**Exhibit EO-1-A**  
**Atlanta Housing Authority (AHA)**  
**FY 2009 CATALYST Activities Directory**

Supporting Activity Name	Former Activity Name(s), If Applicable	FY 2009 Activity Description	Status*	FY 2008	FY 2009
Enhanced Real Estate Inspection Systems		During FY 2009, AHA will continue to use its Inspection Standards for all subsidized units and integrate various inspection processes and systems. This includes inspections for single family, duplex, triplex and quadraplex units that include pre-contract assessments; initial inspections for property inclusion in the Housing Choice program; annual property and unit inspections; special inspections as initiated by participant, landlord or neighbors pertaining to health and safety issues; and Quality Control inspections used to re-inspect properties that have passed or failed previous inspections.	<b>I</b>	√	√
Subcategory 3. Program Support		During FY 2009, AHA will further refine its supporting infrastructure that serves as a foundation for AHA's Housing Choice operations. This includes the administration of the UHAP bankcards, file purges and e-copy, program performance indicators and the customer service call center.			
UHAP Bankcards		During FY 2009, AHA will continue to implement the UHAP bank card business system for 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.	<b>I</b>	√	√
File Purges and E-Copy		AHA will continue transitioning to an all electronic participant and landlord document management and file system.	<b>I</b>	√	√
Program Performance Indicators		AHA plans to develop a broader group of financial and operational performance reports to facilitate improved fact-based decision making by the HC management team. Key operational reports (monthly/quarterly) will cover MTW benchmark performance, contract and document administration, HC technology enhancements, progress monitoring, compliance activity, applicant and participant demographics, waitlist status, eligibility processing, voucher issuance, RTA processing, program moves, site inspections, annual and interim recertification, and landlords' outreach, application and contract status.	<b>I</b>	√	√
Customer Service Call Center		AHA will continue to operate a centralized call center and will continue to enhance its design for improved customer service and response time.	<b>I</b>	√	√



**Exhibit EO-1-A**  
**Atlanta Housing Authority (AHA)**  
**FY 2009 CATALYST Activities Directory**

Supporting Activity Name	Former Activity Name(s), If Applicable	FY 2009 Activity Description	Status*	FY 2008	FY 2009
<b>Asset Management</b>					
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 2009, 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.	<b>I</b>	√	√
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.	<b>P</b>	√	√
Project Based Rental Assistance Site Based Administration	Voucher Administration Reform: On-Site Administration	AHA developed a Project Based Rental Assistance Agreement, which replaces the former Project Based HAP contract, for the effective implementation of the PBRA Site Based Administration and the corresponding streamlined Payment Application Invoicing process. An enhanced technology solution for Site Based Administration is in development and will continue in FY 2009.	<b>I</b>	√	√
Sustaining Mixed-Income Investments	Sustaining Mixed-Income Investments  Sustaining Mixed-Income Investments/Disposition of Public Housing Assisted Units at Mixed-Finance Communities	In order to preserve the AHA-assisted units 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 and move to Project Based Rental Assistance Agreements. During FY 2009, AHA will continue to explore the applicability of this strategy at AHA sponsored mixed-income, mixed-finance communities.	<b>P</b>	√	√





**Exhibit EO-1-A**  
**Atlanta Housing Authority (AHA)**  
**FY 2009 CATALYST Activities Directory**

Supporting Activity Name	Former Activity Name(s), If Applicable	FY 2009 Activity Description	Status*	FY 2008	FY 2009
Innovative Subsidy Strategies	Explore Funding Switch/Rent Structure Subsidy Conversion	This supporting activity will provide innovative strategies for changing the Section 9 subsidy arrangement to a Section 8 subsidy arrangement at AHA high-rise communities in a way that would benefit the most from a change in the subsidy structure.	<b>P</b>	√	√
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.	<b>P</b>	√	√
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.	<b>I</b>	√	√
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.	<b>I</b>	√	√
Oversight of Turnkey III Assets	Close-Out of Turnkey III Homebuyers Program	AHA will continue to provide oversight of the assets related to the close-out of the Turnkey III Homebuyers program.	<b>I</b>	√	√
<b>Human Development</b>					
Human Development		AHA will continue to facilitate and provide linkages for AHA-assisted families to professional human development and support services providers with goals of (a) economically independent families; (b) educated children; and (c) self-sufficient elderly and persons with disabilities.	<b>I</b>	√	√



**Exhibit EO-1-A**  
**Atlanta Housing Authority (AHA)**  
**FY 2009 CATALYST Activities Directory**

Supporting Activity Name	Former Activity Name(s), If Applicable	FY 2009 Activity Description	Status*	FY 2008	FY 2009
Work/Program Participation Requirement	Program Requirements  Work Requirement  Program Participation Requirement	AHA will continue its work policy generally requiring that at least one non-disabled, non-elderly adult in the household receiving a subsidy from AHA under Section 9 or Section 8 work full-time at least 30 hours per week, and that all other non-disabled, non-elderly adults be in a training program or school or any combination of the two.	<b>I</b>	√	√
Connections to Service Provider Network		During FY 2009, 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.	<b>I</b>	√	√
Service Provider Network		During FY 2009, 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.	<b>I</b>	√	√
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.	<b>I</b>	√	√
Housing Choice Family Self-Sufficiency Program Re-engineering	Housing Choice Family Self-Sufficiency (FSS) Program	During FY 2009, AHA will continue its new simplified FSS Program designed to provide mortgage assistance to eligible Housing Choice participants who are first-time homebuyers. This program has transitioned as an opportunity under the agency's Comprehensive Homeownership Program.	<b>P</b>	√	√



**Exhibit EO-1-A**  
**Atlanta Housing Authority (AHA)**  
**FY 2009 CATALYST Activities Directory**

Supporting Activity Name	Former Activity Name(s), If Applicable	FY 2009 Activity Description	Status*	FY 2008	FY 2009
Human Development and Support Services	Human Services Management Client Services	During FY 2009, 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 activities and the Quality of Life Initiative.	I	√	√
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. AHA will continue to offer scholarship opportunities to eligible AHA residents and will seek to raise more private funding to support the program.	I	√	√
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.	I	√	√
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 2009.	I	√	√
Individual Development Accounts (IDAs)		In exploring this initiative, AHA planned 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. However, because of the on-going QLI related activities, AHA has postponed the development and implementation of this program during FY 2009.	PP	PP	PP



**Exhibit EO-1-A**  
**Atlanta Housing Authority (AHA)**  
**FY 2009 CATALYST Activities Directory**

Supporting Activity Name	Former Activity Name(s), If Applicable	FY 2009 Activity Description	Status*	FY 2008	FY 2009
Rapid Response Assistance Team		AHA has established a Rapid Response Team to expeditiously respond to participants affected by foreclosure providing relocation assistance and other support to impacted families. This team also proactively identifies housing in pre-foreclosure status and works to rectify with the property owner and provide assistance to affected families.	<b>I</b>		√
Place-Based Supportive Services Strategy Pilot		AHA in collaboration with a number of partners will continue the implementation of a placed-based pilot referred to as the NORC (Naturally Occurring Retirement Community) Project at Marian Road, Piedmont Road, and Cheshire Bridge Road high-rises. The 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.	<b>I</b>	√	√
<b>Ongoing Business Operations</b>					
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 adopted Asset Management/Project Based Accounting Rule.	<b>I</b>	√	√
Project Based Accounting and Financial Systems	Project-Based Accounting and Financial Systems/Quarterly Financial Statements by Business Line	AHA will continue to refine its information technology/financial reporting environment inside of its ORACLE automated system to allow AHA to produce quarterly financial statements and detailed analysis reports across the entire organization for all program operations.	<b>I</b>	√	√
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 2009.	<b>I</b>	√	√



**Exhibit EO-1-A**  
**Atlanta Housing Authority (AHA)**  
**FY 2009 CATALYST Activities Directory**

Supporting Activity Name	Former Activity Name(s), If Applicable	FY 2009 Activity Description	Status*	FY 2008	FY 2009
Utility Allowance Waiver		During FY 2009, AHA will assess the effects of the utility allowance waiver adjusted during FY 2008 and consider alternative methods for encouraging energy efficient living while reducing the burden of utility expenses on residents living at properties with obsolete systems and infrastructure. Future changes to the utility allowances could 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.	<b>I</b>	√	√
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. During the last half of FY 2008, AHA will have a third party contractor conduct an energy audit of AHA's long-term hold properties in order to identify potential energy cost saving measures that AHA will then consider implementing in FY 2009 or future years.	<b>P</b>	√	√
Procurement Enhancements		In FY 2009, AHA will institute its Total Acquisition Management ("TAM") initiative designed to offer its Business Units "cradle to grave" singular point-of-contact services and technical assistance for acquisitions and related services. AHA will fully utilize the flexibility allowed for the procurement of goods and services below the small purchase threshold and embrace greater use of technology and the world-wide-web to identify vendors and procure goods and services.	<b>I</b>	√	√



**Exhibit EO-1-A**  
**Atlanta Housing Authority (AHA)**  
**FY 2009 CATALYST Activities Directory**

Supporting Activity Name	Former Activity Name(s), If Applicable	FY 2009 Activity Description	Status*	FY 2008	FY 2009
Financial Operations/Single Fund/MTW Block Grant Management		<p>During FY 2009, 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. Replacement Housing Factor grants will be used by AHA in accordance with its Implementation Protocols or otherwise as approved by HUD.</p> <p>In addition, in terms of the Housing Choice Budget Utilization Benchmark as clarified in the FY 2008 Plan, 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 and is incorporated in the Revision of MTW Benchmark Protocol. As such, this approach will be ongoing in FY 2009.</p>	<b>I</b>	√	√
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) and Housing Choice Administrative Plan. As part of AHA's strategy for accomplishing these efforts, AHA will continue to implement activities pursuant to a voluntary compliance agreement with HUD, a four-year agreement which became effective on March 15, 2007.	<b>I</b>	√	√
Corporate Policies Governing Eligibility, Occupancy, and Program Administration	<p>Statement of Corporate Policies Governing the Leasing and Residency of Assisted Apartments</p> <p>Housing Choice Administrative Plan</p>	Both the SCP and Housing Choice Administrative Plan will be updated to clarify established policies and revise existing language, as appropriate, to ensure consistency in rent and occupancy policies governing the public housing and housing choice voucher programs. The Administrative Plan will also include policy language with respect to Reasonable Accommodations which afford persons with disabilities full participation in the Housing Choice Voucher program, and related AHA activities.	<b>I</b>	√	√



**Exhibit EO-1-A**  
**Atlanta Housing Authority (AHA)**  
**FY 2009 CATALYST Activities Directory**

Supporting Activity Name	Former Activity Name(s), If Applicable	FY 2009 Activity Description	Status*	FY 2008	FY 2009
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. During FY 2009 AHA will continue to adhere to the procedures that AHA developed in FY 2007 and implemented in FY 2008.	<b>I</b>	√	√
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.	<b>I</b>	√	√
Permanent Designated Housing		AHA will continue to explore pursuing designations for AHA communities(listed in the Plan under Appendix G) 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. AHA will comply with the MTW Implementation Protocol related to Designated Housing as outlined in Appendix O of this annual plan.	<b>I</b>	√	√
Affordable Fixed Rent Demonstration	Affordable Flat Rent Demonstration	During FY 2007 and FY 2008, AHA explored the concept of implementing an Affordable Fixed Rent Demonstration which would establish a flat rent that all families in the targeted community would be subject to paying. However, during FY 2009 AHA will postpone the Fixed Rent Demonstration and will explore using other innovative subsidy strategies as outlined under the Asset Management Priority activity.	<b>PP</b>	√	<b>PP</b>



**Exhibit EO-1-A**  
**Atlanta Housing Authority (AHA)**  
**FY 2009 CATALYST Activities Directory**

Supporting Activity Name	Former Activity Name(s), If Applicable	FY 2009 Activity Description	Status*	FY 2008	FY 2009
Enhanced Business Systems	Clean and Safe Environment  Enhanced Business Systems (Lease Enforcement, Enhanced Criminal Screening, and Health and Safety Standards)	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 2009, AHA will work from AHA's PMCO Occupancy Guidebook with the goal of improving site-based operational quality and consistency particularly in the areas of intake and re-certification.	<b>I</b>	√	√





**Exhibit EO-1-A**  
**Atlanta Housing Authority (AHA)**  
**FY 2009 CATALYST Activities Directory**

Supporting Activity Name	Former Activity Name(s), If Applicable	FY 2009 Activity Description	Status*	FY 2008	FY 2009
Elderly Income Disregard		AHA will continue to implement an income disregard that excludes employment income earned by elderly residents or participants on fixed income.	<b>I</b>	√	√
\$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.	<b>I</b>	√	√
Enhanced Relocation Procedures and Database Enhancements	Relocation Policies Enhanced Relocation Process and Database Enhancements	During FY 2009, AHA will continue to refine its relocation procedures and Consolidated Relocation Management System (CRMS) in order to enhance operational efficiency, customer service, resident tracking, and reporting, and to ensure compliance with applicable HUD regulations.	<b>I</b>	√	√
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.	<b>I</b>	√	√
Comcast Cable Partnership		AHA will continue to 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.	<b>I</b>	√	√



**Exhibit EO-1-A**  
**Atlanta Housing Authority (AHA)**  
**FY 2009 CATALYST Activities Directory**

Supporting Activity Name	Former Activity Name(s), If Applicable	FY 2009 Activity Description	Status*	FY 2008	FY 2009
Video Call Down Systems		AHA is working closely with the APD, the PMCOs and the contracted security companies to increase the effectiveness of the video monitoring and the roving security patrols at all the communities and until such time that QLI impacted communities has relocated all the residents. The video call down systems facilitate the community security effort during the relocation of the residents. The cameras and recording equipment will be removed from vacated properties prior to the demolition of the property and will be redistributed based on other needs throughout the AHA portfolio.	<b>I</b>	√	√
Organizational Initiatives	Communications Plan  Corporate Culture Project  Human Resources Development	Includes initiatives to enhance AHA's human resource capital for the successful implementation of AHA's Business Plan.	<b>I</b>	√	√

**Atlanta Housing Authority (the "PHA")**  
**Moving To Work (MTW) Demonstration Program**  
**Certification for FY 2009 MTW Annual Plan**

1. The PHA held a public hearing regarding the Plan on April 15, 2008.
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: ccm h  
Board of Commissioners Chairperson

Date: 4.30.08

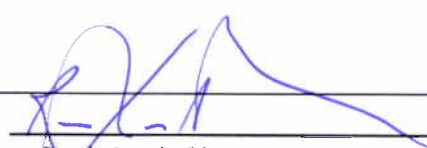
# DISCLOSURE OF LOBBYING ACTIVITIES

Complete this form to disclose lobbying activities pursuant to 31 U.S.C. 1352

Approved by OMB

0348-0046

(See reverse for public burden disclosure.)

<b>1. Type of Federal Action:</b> <input type="checkbox"/> a. contract <input type="checkbox"/> b. grant <input type="checkbox"/> c. cooperative agreement <input type="checkbox"/> d. loan <input type="checkbox"/> e. loan guarantee <input type="checkbox"/> f. loan insurance		<b>2. Status of Federal Action:</b> <input type="checkbox"/> n/a a. bid/offer/application <input type="checkbox"/> b. initial award <input type="checkbox"/> c. post-award		<b>3. Report Type:</b> <input type="checkbox"/> a. initial filing <input type="checkbox"/> b. material change <b>For Material Change Only:</b> year _____ quarter _____ date of last report _____	
<b>4. Name and Address of Reporting Entity:</b> <input checked="" type="checkbox"/> Prime <input type="checkbox"/> Subawardee Tier _____, if known:  Congressional District, if known: 5th			<b>5. If Reporting Entity in No. 4 is a Subawardee, Enter Name and Address of Prime:</b>  n/a  Congressional District, if known:		
<b>6. Federal Department/Agency:</b> U.S. Department of Housing and Urban Development			<b>7. Federal Program Name/Description:</b> Moving to Work Demonstration Program CFDA Number, if applicable: n/a		
<b>8. Federal Action Number, if known:</b>			<b>9. Award Amount, if known:</b> \$ n/a		
<b>10. a. Name and Address of Lobbying Registrant</b> (if individual, last name, first name, MI):			<b>b. Individuals Performing Services</b> (including address if different from No. 10a) (last name, first name, MI):		
<b>11.</b> 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 than \$10,000 and not more than \$100,000 for each such failure.			Signature:  Print Name: Reece Lewis Glover Title: President & Chief Executive Officer Telephone No.: (404) 817-7463 Date: _____		
<b>Federal Use Only:</b>				Authorized for Local Reproduction 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.

According to the Paperwork Reduction Act, as amended, no persons are required to respond to a collection of information unless it displays a valid OMB Control Number. The valid OMB control number for this information collection is OMB No. 0348-0046. Public reporting burden for this collection of information is estimated to average 10 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0046), Washington, DC 20503.



# 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 Federal agency 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

Renée Lewis Glover

Title

President & Chief Executive Officer

Signature

Date

X

## **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:**

<b>Community</b>	<b>Street Address</b>	<b>City, State, Zip Code</b>
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 O. Chiles	435 Joseph E. Lowery	Atlanta, Georgia 30310
17. Jonesboro North	2471 Jonesboro Road	Atlanta, Georgia 30315
18. Jonesboro South	2471 Jonesboro Road	Atlanta, Georgia 30315
19. Juniper & 10 <sup>th</sup>	150 Tenth Street	Atlanta, Georgia 30309
20. Leila Valley	2413 Leila Lane	Atlanta, Georgia 30315
21. McDaniel Glenn	531 McDaniel Street	Atlanta, Georgia 30312
22. M.L. King Tower	525 Whitehall Terrace	Atlanta, Georgia 30312
23. Marian Road	760 Sidney Marcus Boulevard	Atlanta, Georgia 30324
24. Marietta Road	2295 Marietta Road	Atlanta, Georgia 30318
25. Martin Street Plaza	600 Martin Street	Atlanta, Georgia 30312
26. Palmer House	430 Centennial Olympic Park Drive	Atlanta, Georgia 30313
27. Peachtree Road	2240 Peachtree Road	Atlanta, Georgia 30309
28. Piedmont Road	3601 Piedmont Road	Atlanta, Georgia 30305
29. Roosevelt House	582 Centennial Olympic Park Drive	Atlanta, Georgia 30313
30. Thomasville Heights	1038 Henry Thomas Drive	Atlanta, Georgia 30315
31. U-Rescue Villa	355 North Avenue	Atlanta, Georgia 30308
32. University Homes	660 Fair Street	Atlanta, Georgia 30314
33. 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:**

<b>Community</b>	<b>Street Address</b>	<b>City, State, Zip Code</b>
1. Auburn Pointe	322 Decatur Street	Atlanta, Georgia 30312
2. Ashley Collegetown at West End	387 Joseph E. Lowery, Boulevard, SW	Atlanta, Georgia 30310
3. Ashley Courts at Cascade	1371 Kimberly Way	Atlanta, Georgia 30331
4. Ashley Terrace at West End	717 Lee Street	Atlanta, Georgia 30310
5. Capitol Gateway	89 Woodward Avenue	Atlanta, Georgia 30312
6. Centennial Place	526 Centennial Olympic Park Drive	Atlanta, Georgia 30313
7. CollegeTown at West End	920 Sells Avenue	Atlanta, Georgia 30310
8. Columbia Commons	2524 Martin Luther King, Jr. Drive	Atlanta, Georgia 30311
9. Columbia Creste at West Highlands	1903 Drew Drive	Atlanta, Georgia 30318
10. Columbia Estates at West Highlands	1710 Noel Street	Atlanta, Georgia 30318
11. Columbia Grove at West Highlands	1783 Johnson Road	Atlanta, Georgia 30318
12. Columbia Mechanicsville (Multi-family)	500 McDaniel Street	Atlanta, Georgia 30312
13. Columbia Mechanicsville Senior	555 McDaniel Street	Atlanta, Georgia 30312
14. Columbia Park Citi at West Highlands	921 West Moreland Circle	Atlanta, Georgia 30318
15. Columbia Village	100 Jessica Avenue	Atlanta, Georgia 30032
16. Magnolia Park	60 Paschal Boulevard	Atlanta, Georgia 30314
17. Summerdale Commons	2745 Hapeville Road	Atlanta, Georgia 30315
18. The Villages at Carver	174 Moury Avenue	Atlanta, Georgia 30315
19. The Villages at Castleberry Hill	600 Greensferry Avenue	Atlanta, Georgia 30314
20. The Villages of East Lake	460 East Lake Boulevard	Atlanta, Georgia 30317
21. West Highlands at Heman E. Perry Boulevard	18101 Kerry Drive	Atlanta, Georgia 30318

**Project-Based Section 8 Properties:**

<b>Community</b>	<b>Street Address</b>	<b>City, State, Zip Code</b>
1. Auburn Glen	49 Boulevard, SE	Atlanta, Georgia 30312
2. Campbell Stone Apartments Senior	2911 Pharr Court South NW	Atlanta, Georgia 30305
3. Columbia at Sylvan Hills	1150 Astor Avenue, SW	Atlanta, Georgia 30310
4. Columbia Colony Senior	2999 Continental Colony Parkway	Atlanta, Georgia 30331
5. Columbia Commons	2524 MLK Jr. Drive	Atlanta, Georgia 30311
6. Columbia Heritage – Senior	1900 Perry Boulevard	Atlanta, Georgia 30318
7. Columbia High Point - Senior	220 Bowen Circle	Atlanta, Georgia 30315
8. Columbia Park Commons-HFS	200 Peyton Place	Atlanta, Georgia 30311

## Certification for a Drug-Free Workplace

p.3

9. Columbia Park Commons-HFOS	150 Peyton Place	Atlanta, Georgia 30311
10. Columbia Senior at Blackshear	14 Meldon Avenue	Atlanta, Georgia 30315
11. Columbia Senior at Edgewood	1281 Caroline Street	Atlanta, Georgia 30307
12. Columbia Towers at MLK	350 Martin Street	Atlanta, Georgia 30312
13. Columbia Towers at MLK Village	380 Martin Street	Atlanta, Georgia 30312
14. Columbia Village	100 Jessica Avenue	Atlanta, Georgia 30032
15. Constitution Avenue Apts.	960 Constitution Avenue	Atlanta, Georgia 30315
16. Crogman School	1093 West Avenue	Atlanta, Georgia 30312
17. Gateway at Northside Village	370 Northside Drive	Atlanta, Georgia 30318
18. Gladstone Apartments	545 Burroughs Street – B	Atlanta, Georgia 30315
19. Hampton Oaks - COOP	1955 Ladawn Lane	Atlanta, Georgia 30318
20. Heritage Green	2891 Springdale Road	Atlanta, Georgia 30315
21. Heritage Station I (Multi-family)	765 McDaniel Street	Atlanta, Georgia 30310
22. Heritage Station II (Senior)	765 McDaniel Street	Atlanta, Georgia 30310
23. Park Place South	240 Amal Drive	Atlanta, Georgia 30315
24. The Park at Scott's Crossing	1620 Hollywood Road	Atlanta, Georgia 30318
25. Pavilion Place	532 Cleveland Avenue	Atlanta, Georgia 30315
26. The Peaks at MLK	2423 M.L.K., Jr. Drive	Atlanta, Georgia 30311
27. The Renaissance at Park Place South – Senior	240 Amal Drive	Atlanta, Georgia 30315
28. The Highbury Terraces	40 Mount Zion Road	Atlanta, Georgia 30354
29. Toby Sexton/GE Towers	490 Glenn Street	Atlanta, Georgia 30312
30. Veranda at Carver Senior	217 Thirkeld Avenue	Atlanta, Georgia 30314
31. Veranda at College Town Senior	372 Legacy Drive	Atlanta, Georgia 30310
32. Villas Apartments		
33. Woods at Glenrose	2905 Third Avenue	Atlanta, Georgia 30315
	50 Mount Zion Road	Atlanta, Georgia 30354

### 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  
749 McDaniel Street  
Atlanta, Georgia 30310

## **Certification for a Drug-Free Workplace**

**p.4**

The Housing Authority of the City of Atlanta, Georgia  
Facilities Maintenance Shop  
568 Humphries Street  
Atlanta, Georgia 30312

Fulton Street/McDaniel Glenn Vacant Property  
John Hope Model Building Vacant Property  
Gilbert Gardens Annex Vacant Property



Atlanta Housing Authority

230 John Wesley Dobbs Avenue  
Atlanta, Georgia 30303  
404.892.4700  
[www.atlantahousing.org](http://www.atlantahousing.org)