



# MOVING-TO-WORK (MTW) ANNUAL PLAN

**FY 2022**

Board Approval: TBA  
HUD Submission: TBA  
HUD Acceptance: TBD

**Public Comment Period:**  
*February 7 – March 9, 2020*

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## *Moving-to-Work Since 2003*

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*Thank you to all AH individuals and teams that contributed to the preparation and publication of this document.*

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# I. INTRODUCTION: OVERVIEW OF GOALS AND OBJECTIVES

## Introduction

The city of Atlanta and the surrounding area rank in the top 10 fastest growing cities and metropolitan areas in the country and among the top 40 cities by population. Atlanta Housing's (AH) service jurisdiction includes the city of Atlanta and extends beyond city boundaries into the metropolitan area. Because of Atlanta's steady population boom each year, AH continues to respond to the ever-present challenge of affordable housing needs throughout its service jurisdiction. Only because of AH's Moving to Work (MTW) designation<sup>1</sup> has AH been able to respond effectively to the twin challenges posed by Atlanta's rapid growth and increasing market rents.

The MTW Program is a demonstration that permits selected public housing authorities/agencies<sup>2</sup> (PHAs) to utilize MTW Authorizations to waive certain Public Housing (PH) and Housing Choice Voucher (HCV) program rules and regulations found in the United States Housing Act of 1937 (Housing Act or the Act) in pursuit of solutions to local challenges. AH pursues these solutions in alignment with the three **MTW Statutory Objectives**:

- Reduce cost and achieve greater cost effectiveness in Federal expenditures;
- Give incentives to families with children where the head of household is working, is 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
- Increase housing choices for low-income families.

## A Look Ahead to FY 2022

In FY 2022, AH will prioritize the following:

- **Create new or preserve existing affordable housing units** through new construction, significant rehabilitation, substantial modernization, tenant-based voucher (TBV) issuance/renewal, new/renewed HomeFlex Assistance Payment (HFAP) Agreements, and new down payment assistance (DPA) awards.
- **Increase or maintain an acceptable voucher utilization rate** through the issuance and lease-ups of TBVs and the assignment and lease-up of HomeFlex (AH's project-based assistance program) agreements.
- **Increase the number of new households served** by AH by leasing up newly completed construction projects, issuing and leasing new TBVs, assigning and leasing up new HFAPs, and awarding DPA to eligible first time homebuyers.
- **Increase or maintain an acceptable work/program compliance rate** by assisting non-compliant families in retaining employment or returning to the workforce after an extended period of unemployment.

In addition to the MTW Statutory Objectives, AH also asks three basic questions when introducing innovations and new initiatives (or modifying existing ones). Those three questions are as follows:

- Is the activity **good for the residents**?
- Is the activity **good for the agency**?
- Is the activity **good for the community**?

<sup>1</sup> By way of approved MTW Agreement between Atlanta Housing (AH) and the United States Department of Housing and Urban Development (HUD), 2003.

<sup>2</sup> There are only 39 MTW PHAs nationwide and AH was selected in 2003.

Ultimately, if innovations and new initiatives do not receive unanimous affirmations to all of the basic questions, then those activities need further discussion that may occur during FY 2022 or later. In these pandemic times, AH will also focus its resources in areas that:

- **Assist in adding quality units** to the affordable housing stock by expediting, as able, housing projects in AH's planning and development pipeline.
- **Improve the administration of safety measures** to safeguard program participants, staff, vendors, stakeholders and others.
- Increase its ability and capacity to **offer rental assistance and deliver housing services at a high-level through digital platforms** throughout its service jurisdiction.

AH possesses the authority, by agreement, to modify PH and HCV program rules and regulations, AH must use the MTW Plan to inform HUD of such plans to utilize MTW Authorizations. AH discusses the three listed **activities below in Section III. Proposed MTW Activities: HUD Approval Requested.**

- 2022.01 - Elimination/reduction of Interim Certification Examinations;
- 2022.02 - AH's Construction Limit Costs (CLC) Schedule; and
- 2022.03 - Creation of Choice Neighborhoods (CN) Down Payment Assistance (DPA) Program.

During FY 2022, AH will continue to vet potential activities for possible MTW Plan inclusion. These activities may later present as MTW Activity modifications/updates to existing MTW Activities or as new MTW Activities. An overview of these activities for FY 2022 discussion include:

- Activating an Annual Contributions Contract (ACC) Public Housing under the Faircloth Limits.
- Designing a program that allows ACCESS graduates a "stabilization" period prior to program termination
- Implementation of AH's Biennial Inspection Schedule.

The next section summarizes the breakdown of the assisted households AH expects to serve in FY 2022. This projection breakdown models the HUD Substantially the Same methodology. AH also projects the total number of households and breaks out the number of new households anticipated during FY 2022.

## The Impact of COVID-19

In FY 2021, AH operated under the challenges posed by the coronavirus (COVID-19) pandemic, which increased operational expenses and posed a variety of administrative challenges. The passage of the Coronavirus Aid, Relief and Economic Security (CARES) Act and HUD guidance encouraged PHAs to utilize COVID-19 Statutory and Regulatory Waivers,<sup>3</sup> which provided AH some financial relief during FY 2021, and in some cases offered more flexibility than some of AH's existing MTW Authorizations allowed.

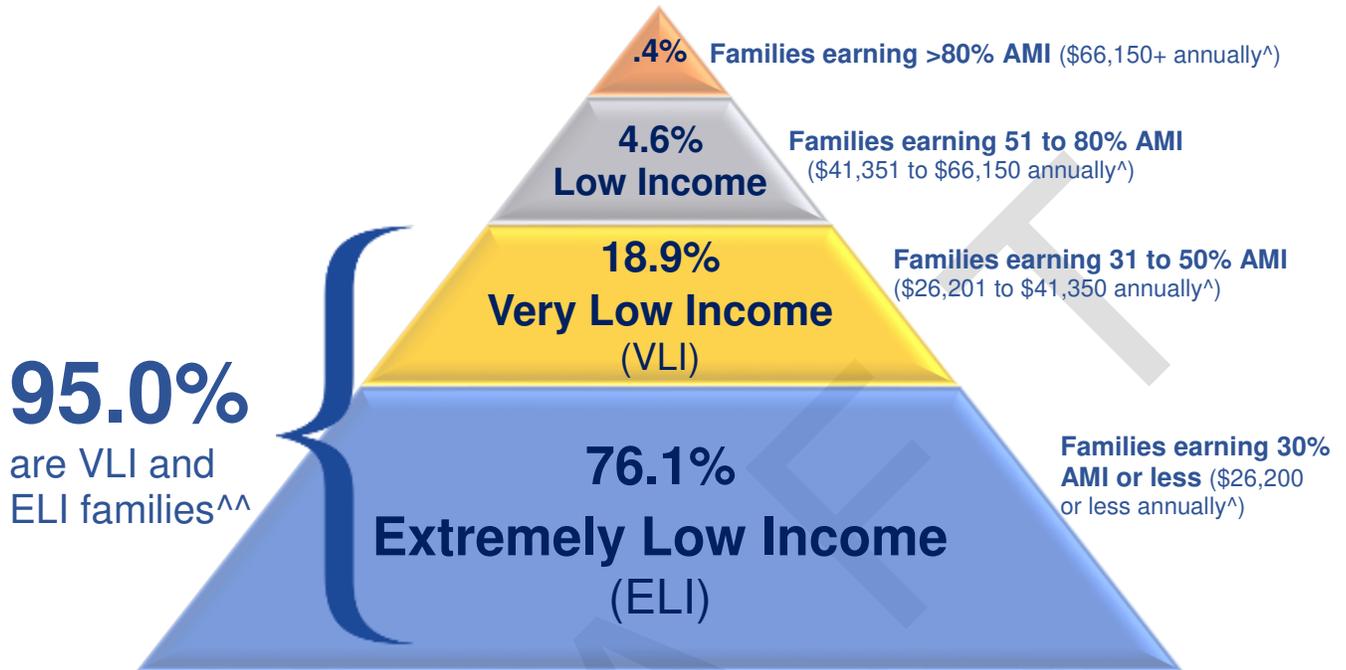
However, because COVID-19 Waivers are set to expire during the first half of AH's fiscal year<sup>4</sup> and AH anticipates COVID-19 parameters and protocols to remain in place through the end of the calendar year (2021), AH expects to continue business under COVID-19 parameters and protocols in FY 2022. Therefore, **AH prepares its FY 2022 MTW Annual Plan under the assumption that COVID-19 will continue to influence AH operations** during FY 2022. AH does not anticipate the need to postpone new program introductions because of COVID-19, but if delays are required, AH will document such delays in its MTW Report as applicable.

<sup>3</sup> Outlined in Notice PIH 2020-05

<sup>4</sup> COVID-19 Waivers expire on June 30, 2021 or December 31, 2021. As of today, AH is unaware of any extensions for COVID-19 Waivers.

## 2022 Highlights and Program Statistics

### Projected Breakdown of Assisted Households by Unit Category<sup>^</sup>



<sup>^</sup>Source: HUD Income Limits approved April 2020 and based on a Family of Four. <sup>^^</sup>Source: Data Reporting and Analysis.

### Projected Net New Households



\*TBVs = Tenant-Based Vouchers; DPA = Down Payment Assistance.

## AH Team Overview and Highlights – Operational Teams

It takes the support of the entire agency to carry out AH's activities. However, for purposes of this Plan, AH highlights business units that tie directly to AH numerical goals and objectives or MTW Activities.

### ASSET & PROPERTY MANAGEMENT (APM)

#### Brief Description of Business Unit:

APM manages AH's relationships with private owners/developers and property management companies at properties within our real estate portfolio. In addition, APM monitors and reports the financial, operational and compliance performance of properties, and oversee project-based rental assistance at private multi-family properties. Further, this team creates and preserves affordable housing units for low-income families by recruiting and retaining property owners and ensuring residents are living in safe, decent, and sanitary conditions with quality living services utilizing the Rental Assistance Demonstration (RAD) and its HomeFlex Programs.

Through APM, AH works closely with Property Management Developers (PMDs) to focus on operational and compliance matters such as occupancy, rent collection rates, 50058 submissions, financial statement reviews, utility administration, resident concerns, and similar operational functions. The portfolio consists of 9 AH-Owned communities and 37 **mixed-income** properties<sup>5</sup>. AH's mixed-income portfolio increases each year as AH completes projects in its real estate development pipeline.

AH has used the **RAD Program** to recapitalize its public housing communities by converting those communities (more than 1,300 units) to long-term, Section 8 project-based assistance. Further, AH may partially dispose of conversion projects and replace affected units with project-based vouchers (PBVs) by utilizing RAD Section 18 elements. Capital improvement projects, facilities maintenance, and communities that need substantial rehabilitation or significant modernization to meet contractual compliance or current RAD requirements is overseen by AH's Construction and Facilities Management business unit (please see page TBD).

AH's locally designed project-based rental assistance program, **HomeFlex**, provides AH with practical, affordable housing solutions in Atlanta's tight real estate market. This program was created through AH's MTW designation and without it, AH could not have created or preserved more than 8,000 affordable housing options for families earning less than 80% of the area median income (AMI). The HomeFlex Program allows AH to work closely with private multi-family property owners and developers to reserve a portion of their rental units for eligible program participants through a HomeFlex Assistance Payment Agreement. This agreement allows AH to create or to preserve rental-housing opportunities at properties or in areas that low-income families might not have otherwise considered or been able to afford without the assistance of HomeFlex. The HomeFlex Assistance Payment Agreement terms range from 2 to 20 years, and although AH caps its project-based assistance, AH retains the flexibility to project-base 100% assistance at communities owned directly or indirectly by AH without competition pursuant to its MTW agreement. If invoked, this flexibility permits AH to increase the number of affordable housing choices offered to low-income families. Typically, AH limits assistance to 50% at family at properties receiving HomeFlex assistance and permits up to 100% assistance at HAVEN Supportive Housing and Elderly HomeFlex properties. Below is an overview of HomeFlex sub-programs:

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<sup>5</sup> Many of the 37 communities are nearing the end of their initial 15-year compliance period. AH will work with owner/partners to determine the best course to maintain the physical and financial viability of these assets. Some communities may be eligible for significant rehabilitation or substantial modernization.

- **Standard HomeFlex:** designated for multi-family units in AH-Owned, Mixed, or Stand Alone privately owned communities. AH limits project-base assistance to 50%<sup>6</sup> at such communities.
- **HomeFlex Older Persons/Elderly:** designated for buildings or communities that house near elderly (55+) and elderly (62+) residents. AH may project-base 100% assistance at these communities.
- **HomeFlex Supportive Housing (HAVEN):** designated for property owners/developers that agree to provide housing for a targeted population and related wrap around services. AH may project-base 100% assistance at these communities.

Overall, the HomeFlex Program has been a huge success. However, through application of its MTW Authorizations under its MTW Agreement and pursuant to previous HUD-approved MTW Plans, AH also retains the ability to exceed program cap limits, percentage increases, project cap limits, and similar limitations outlined in Public and Indian Housing (PIH) Notice 2017-21 Implementation Guidance: Housing Opportunity through Modernization Act (HOTMA) of 2016 – Housing Choice and PBV provisions.

#### **FY 2022 Highlights:**

- Add affordable housing units by creating 145 new HomeFlex units to add to the more than 8,000 project-based rental assistance units already created under the HomeFlex Program.
- Preserve the affordability of 932 existing HomeFlex units through the renewal of existing HomeFlex Assistance Payment Agreements.
- Continue to preserve the affordability of units through the conversion of 431 public housing units to long-term Section 8 project-based voucher (PBV) assistance under HUD's Rental Assistance Demonstration (RAD) Program.
- Plan to convert AH's remaining public housing stock pursuant to its RAD conversion schedule.
- Implement a biennial inspection schedule.
- Continue conducting virtual HomeFlex inspections under COVID-19 parameters.
- Prioritize development of projects on AH vacant land through Notice of Funding Availability (NOFA) issuance(s).

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<sup>6</sup> AH is able to exceed 25% (50% in the case of RAD) cap limits through MTW utilization; however, AH limits project-base assistance to 50% at multifamily communities in accordance with its Deconcentration Policy. Therefore, AH may exceed its policy caps on a case-by-case basis as approved by the AH Board of Commissioners.

## CHOICE NEIGHBORHOODS

### Brief Description of Business Unit:

The Choice Neighborhoods (CN) Team manages AH's \$30 million Choice Neighborhoods Implementation Grant (CNIG) from HUD to redevelop the former University Homes public housing site and revitalize the University Choice Neighborhood (UCN), which is comprised of the Ashview Heights, Atlanta University Center, and Vine City neighborhoods (see image to the right). The CN adopted HUD's transformation mantra of Housing, People, and Neighborhoods while working in concert with the City of Atlanta and external partners to implement transformation activities. AH has a timetable to expend all of the grant funds by the September 30, 2022 end date.

### FY 2022 Highlights:

#### Housing

- Continue to add affordable housing units to Scholars Landing, the former University Homes public housing site.
- Continue to work in concert with the Housing Lead to oversee 100% lease up of HomeFlex units and nearly two-thirds of the workforce and market units at the end of FY 2020.
- Continue to work closely with Real Estate Planning & Development and Asset & Property Management business units during the construction and lease up of CN units.
- Completion and the lease up of the 72-unit Ashley IC multifamily phase III.
- Commence construction on the final 212-unit multifamily rental Phase IV (Ashley II). Former University Homes residents will continue to have the first right of return to the completed AH-assisted rental units.
- Start construction start on Phase V at Scholars Landing to include for-sale townhomes.

#### People

- Connect former University Homes and UCN residents to education, health, and workforce development supportive services and resources.

#### Neighborhoods

- Continue revitalization activities in the UCN that include acquisition of blighted and deteriorated properties for future single-family home development.
- Available assistance to legacy homeowners for exterior home repairs and façade improvements.
- Complete the rehabilitation of the historic Roosevelt Hall building as a vibrant community facility.
- Design and implement a CN homebuyer Down Payment Assistance (DPA) Program that provides up to \$60,000 in deferred loans to eligible persons with incomes up to 115% of the Area Median Income (AMI), adjusted for family size. This DPA program is exclusive to new home purchases at the Scholars Landing site and within the UCN.
- Invest funds from multiple sources, such as CNIG, MTW Funds, program income, CDBG and non-federal funds in the delivery of its services and transformation of the UCN via its Housing, People, and Neighborhoods mantra.



## HOUSING CHOICE VOUCHER (HCV) PROGRAM

### Brief Description of Business Unit:

The HCV team administers all aspects of AH's tenant-based rental assistance program through the oversight of more than 19,000 tenant-based vouchers (TBVs) under conventional and innovative tenant-based rental assistance programs. Under the conventional assistance, the team directly engages in activities such as conducting eligibility screenings, processing new program admissions, conducting recertification interviews, reviewing and enforcing program compliance, monitoring families transferring into and out of AH's service jurisdiction, and performing housing quality standard (HQS) inspections and special inspections on assisted units created by AH or selected by program participants.

Approximately 52% or 9,800 of the 19,000 TBVs are implemented under the traditional Section 8 tenant-based rental assistance program and approximately 11% of the 19,000 TBVs are assigned to rental assistance programs created under AH's MTW designation to address local housing issues. The balance, approximately 37%, of TBVs are dedicated as project-based vouchers (PBVs) under AH's HomeFlex Program administered by AH's Asset & Property Management business unit.

In addition to engaging in conventional tenant-based rental assistance activities, the HCV team oversees alternative assistance programs, collectively known as HAVEN, which AH directs towards families with special needs or heightened risk of homelessness, created through a combination of grant awards MTW designation, and AH's Annual Contributions Contract (ACC) voucher allotment.

Further, because AH is converting its public housing units to long-term Section 8 PBV assistance under the Rental Assistance Demonstration (RAD) Program, AH has created an alternate Choice Mobility option under RAD requirements. Under this option, AH limits the commitment of turnover TBVs to RAD PBV families until after the family occupies the RAD PBV unit for 12 consecutive months in good standing. In addition to this cap, AH created a separate waiting list for such families to ensure uniformity and fairness among issuance of turnover TBVs to RAD PBV families. Without the ability to cap turnover TBVs, AH would not be able to serve families on the traditional HCV waiting list with turnover TBVs.

### FY 2022 Highlights:

- Explore federal and foundation awards to assist the HCV team in undertaking activities that help low-income families expand their choices in areas of the city in which to call home.
- Manage HCV Waiting List of more than 23,000 applicants (waiting list is closed)
- Manage AH's RAD PBV Waiting List by designating a percentage of turnover tenant-based vouchers under AH's alternative Choice Mobility option for RAD PBV families that express an interest in moving after 12 consecutive months of occupancy in good standing in a public housing community converted under the RAD Program.
  - The property must reach its conversion anniversary before the requesting family.
- Support newly created HAVEN programs:
  - By reallocating 53 vouchers for Integrated Care and Permanent Supportive Housing (ICPSH) and Rise II activities,
  - By reallocating 100 vouchers for COVID Rapid Support Housing,
  - By securing 23 vouchers for Mainstream One and Mainstream Five Programs.
- Support AH's established HAVEN programs:
  - 300 Family Unification Program (FUP) vouchers,
  - 675 FLOW vouchers,
  - 54 Georgia Housing Voucher Program (GHVP) vouchers,
  - 100 Special Program Vouchers for Homeless Students (or APS vouchers),
  - 100 Housing First Vouchers, and
  - 270 Veteran Affairs Supportive Housing (VASH) vouchers.
- Implement a biennial HQS inspection schedule.

## REAL ESTATE PLANNING AND DEVELOPMENT

### **Brief Description of Business Unit:**

The Real Estate Planning & Development (REPD) team employs a portfolio approach to develop affordable housing in healthy communities throughout AH's service jurisdiction. REPD is responsible for end-to-end oversight of the real estate development process, from feasibility assessments and master planning through design and construction to lease-up, at which point a project transitions to Real Estate Operations Asset and Property Management. REPD oversees the planning and development of existing and future AH land – on AH parcels and on land owned by third parties, through partnerships and investments with affordable housing developers. In addition, the REPD team focuses on the acquisition of new properties and is responsible for establishing a self-development plan for the agency.

With regard to development activities, the business unit works to engage the community and to invest in and support community revitalization efforts in neighborhoods where AH development projects are located. To achieve these holistic goals, REPD works cross-functionally with other AH business units and collaborates with external, like-minded agencies, organizations and developers. Depending on the development program and plan, REPD manages a pipeline of real estate projects in various phases of the development cycle, from acquisition to developer partnership and build-out to lease-up. AH separates its real estate development portfolio into geographic quadrants and within these quadrants, AH plans to focus on development projects consistent with its 10-year real estate plan, which is an in-house tool to guide and prioritize the timing and funding of developments.

REPD is also tasked with acquiring new properties with existing units to increase the supply of affordable housing. Acquisition efforts, whether through purchases, donations, or land swaps, can support co-investment and self-development projects that require access to new investment sources and private capital. Through the ownership of land, AH can ensure long-term affordability of the property and increase the future supply of affordable housing.

Another area of focus for REPD is to establish a plan for self-development as a tool to accelerate the development of affordable housing – while continuing to develop affordable housing through public-private partnerships. A self-development program, consistent with other MTW agencies, would allow full utilization of AH plans, capacity and resources to directly manage the project design and construction costs and timelines to further affordable housing development, and create opportunities to increase revenue-generation for further development of affordable housing. REPD and the AH team will build-out the business plan and continue building internal capacity in planning and development, augmenting internal expertise with a bench of procured professional service firms that include brokers, planners, architects, engineers, construction managers, contractors, and developers.

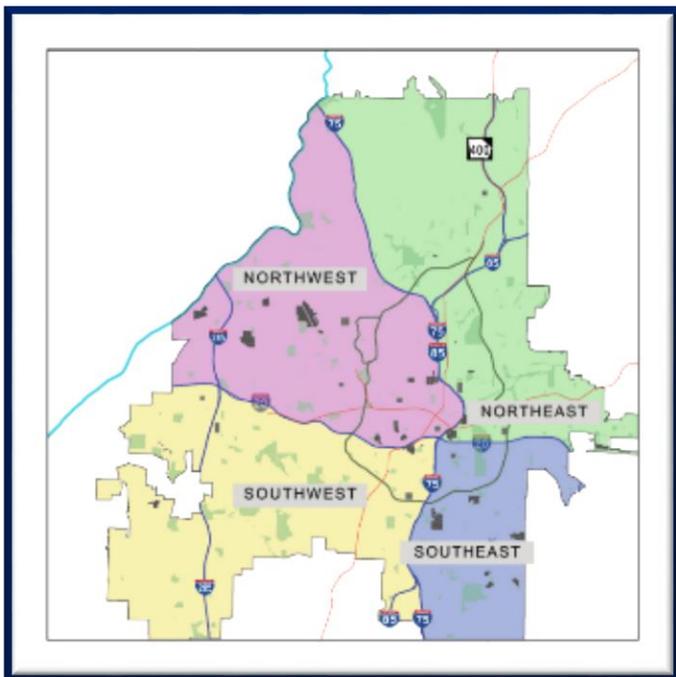
### **FY 2022 Highlights:**

- Advance, commence, or complete development pipeline projects that includes two types of real estate investments:
  - 1) Development on AH-Owned land and
  - 2) Development where AH is not the landowner, but a partner, co-developer, and/or investor in the transaction (“AH Co-investment Program”).
  - Development projects may be transactional focusing on single phases of development, or transformational focusing on multi-phased development projects involving community revitalization. Under each approach, REPD's primary focus is on accelerating the development of new affordable housing.
- Create and preserve affordable housing with investments and land transactions, anticipating financial closings.
  - Consider utilizing a traditional model of private-public development partnership
  - Explore co-development properties or develop under a self-development model.
- Commence construction starts on 1,608 rental units.
- Continue the build-out of 550 rental and homeownership units.

- Transition 297 units to lease-up.
- Continue to acquire land and structures.
- Dispose of land through land swaps, ground leases and land sales to create affordable housing or to generate revenue to support the development of affordable housing units or projects.
- Identify and develop partnerships and financial vehicles to leverage resources that will support the construction of affordable units on AH vacant land and through the AH Co-investment Program.
- Continue to advance non-traditional MTW approaches to development that promote efficiency, effectiveness and innovation in housing delivery.
- Continue to research the creation of an investment vehicle to support a diversity of affordable housing with economic opportunities as part of its community revitalization efforts that may include commercial development/ownership.

AH separates its real estate development portfolio into geographic quadrants ultimately market conditions, leadership, and other variables dictate the timing, partnerships, and investments in potential projects.

The following are a few noteworthy projects broken down by quadrant (shown in the map below):



**Northeast:** 1) AH vacant land: Master planning and initiate development at the Civic Center (395 Piedmont Avenue NE and 301 SoNo (301 North Avenue)); 2) AH Co-investment Program: in-progress construction of Madison Reynoldstown (890 Memorial Drive).

**Northwest:** 1) AH vacant land: Closing and construction on Phase 2 of the former Herndon Homes public housing site (464 Cameron Madison Alexander Boulevard) that will include retail and 197 multifamily mixed-income units. Construction on final two rental phases at Scholars Landing (134 John Hope Drive SW), Ashley IC, a 72-unit multifamily rental project and Ashley II, a 112-unit multifamily rental project (please see page TBD for details). Begin master planning and community engagement at Bowen Homes through the 2020 HUD Choice Neighborhoods Planning Grant (CNPG); 2) AH Co-investment Program: Complete renovation and re-occupancy of the 200-unit multifamily rental complex at London Townhomes (308 Scott Street) and finalize lease-up.

**Southeast:** 1) AH vacant land: Closing and construction of new multifamily rental units at the former Englewood public housing site (address).

**Southwest:** 1) AH Co-investment Program: In-progress construction at Heritage at West Lake (239 West Lake Avenue), Harmony at Bakers Ferry (3650 Bakers Ferry Road), Stone Hogan (0 Continental Colony Parkway), and Sylvan Hills II (950 Sylvan Road SW).

## TRANSACTIONS MANAGEMENT AND CAPITAL MARKETS

### Brief Description of Business Unit:

Transactions Management and Capital Markets (TMCM) team underwrites and manages AH's rental real estate transactions involving either new construction or the substantial rehabilitation of rental units, such as through the Rental Assistance Demonstration (RAD) Program. In addition, the TMCM projects financial needs for AH-Owned rental units and identifies new capital sources. Finally, the team administers AH's down payment assistance (DPA) programs to increase homeownership opportunities for eligible first-time homebuyers. Originally, AH's homeownership assistance focused on awards in areas around HOPE VI sites<sup>7</sup> and has since expanded. Under the current format, AH gives a priority and higher level of assistance to current and former AH-assisted families, and professionals and para-professionals employed in education, public safety, and healthcare looking to purchase a home within the city of Atlanta.

### FY 2022 Highlights:

- AH and its partners may seek to convert units receiving public housing assistance to long-term Section 8 project-based voucher (PBV) assistance under RAD.
  - To date, AH has converted 1,340 public housing units to PBV assistance under RAD.
  - Convert 431 public housing units.
  - Work collaboratively to schedule and underwrite approximately 1,262 public housing units at nine AH-Owned communities that remain in AH's rental portfolio.
    - As appropriate, convey AH-Owned land to property management developers (PMDs) once public housing units convert to PBV assistance under RAD.
- Ensure long-term affordability by employing third-party funding tools, such as Low-Income Housing Tax Credits (LIHTC), municipal bonds, private mortgage financing, and other tools that provide rent relief.
  - Monitor older mixed-income communities approaching the end of their tax credit compliance period.
- Through collaboration, continue to schedule and underwrite former public housing sites into mixed-use and mixed-income communities, such as Scholars Landing, formerly University Homes.
- In limited cases, provide capital investments (often in conjunction with other agencies) in third-party developments that advance AH's affordable housing mission.

Since its inception in FY 2007, AH's Homeownership Program has assisted more than 1,300 families realize their dream of homeownership through a DPA award. AH's DPA award can be combined with other DPA awards to maximize affordability in purchasing a home within AH's service jurisdiction. Under the current format, AH plans to award 225 DPA awards in FY 2022.

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<sup>7</sup> Program effort initiated by HUD to transform public housing and high concentrations of poverty through the development of mixed-income communities

## AH Team Overview and Highlights – Supportive Teams

### Brief Description of Business Unit:

These teams focus on providing **day-to-day support in the implementation and administration of housing services, housing delivery**, and rental assistance programs. They include Finance, Communications and Marketing, Contracts and Procurement, Construction and Facilities Management, Government and External Affairs and Human Development Services, Human Resources, and Information Technology.

These teams evaluate and maintain a variety of platforms focused on information and compliance. They also monitor and contractual compliance and oversee diversity and inclusion efforts involving AH contracts. In addition, this group also ensures that AH remains in compliance with Federal rules and regulations, provide consistent evaluation and categorization of funding sources that keep rental assistance programs and AH operations within guidance directives and documents. Further, this group develops strategies that ensure AH is compliant in its hiring, retention, and termination practices, ensures that AH staff is outfitted with the latest equipment and software to work efficiently and effectively while protecting personal identification information (PII) of program participants, and maintaining multiple digital platforms that keep program participants and AH stakeholders informed. Finally, this group meets applicable requirements established by the Americans with Disabilities Act (ADA) in the offering of reasonable accommodations, access and visual appearance of published information, and other appropriate measures that ensure the equality and fairness in the delivery of housing services and programs.

### FY 2022 Highlights:

- Collaborate with other AH teams to develop strategies that ensure AH compliance with the proposed new Section 3 rule before or by the expiration of the published transition period and compliance date.
- Collaborate with internal business units external partners to develop real estate policies and design programs that position AH to maximize affordable housing opportunities.
- Collect, process, monitor, and report COVID-19 related expenditure activities.
- Continue to work with internal business units to design a program that assists AH employees in the purchase of a home through down payment assistance.
- Recruit external partners to close the digital divide.
- Begin to explore potential incentives for assisted families that participate in AH's Achieving Connectivity to Create Equity, Solidarity and Success (ACCESS) Program.
- Strengthen AH's digital footprint through training and the expansion of social media platforms to ensure that program participants are connected and informed.

## CONSTRUCTION & FACILITIES MANAGEMENT

### **Brief Description of Business Unit:**

Construction and Facilities Management (CFM) maintains service contracts, oversees capital improvement projects, and provides inspections for AH's corporate office, two satellite offices, nine public housing communities, 35-car fleet, and vacant developed and undeveloped parcels are managed under this business unit. CFM's primary focus is to monitor the maintenance, upkeep, and safety of AH-Owned facilities, which includes elevator and equipment operation, first alert systems, carbon monoxide detectors, and similar safety measures.

AH delegates the management of its nine public housing communities with property management developers (PMDs), which perform capital improvement projects at the communities under the supervision of CFM. The team may undertake substantial rehabilitation or significant modernization projects at AH offices, manage the rehabilitation or modernization of assisted properties under the Rental Assistance Demonstration (RAD) Program.

### **FY 2022 Highlights:**

- Oversee building safety and operations at AH corporate offices, satellite offices, AH-Owned communities, and other facilities regularly visited/occupied by residents, staffs, vendors, and AH stakeholders.
- Amidst COVID-19, closely follow the guidance of City of Atlanta protocols in the closure or re-occupancy of AH offices.
- Support management of 686 substantial rehabilitation or significant modernization projects at AH-Owned communities to meet unit conversion requirements under the RAD Program.

## GOVERNMENTAL, EXTERNAL AFFAIRS AND HUMAN DEVELOPMENT SERVICES

### **Brief Description of Business Unit:**

Through its partnerships, AH is able to assist more families than it could assist on its own. GEAHDS recruit and strengthen these partnerships to respond to pressing local needs, such as homelessness and homelessness prevention, health and wellness, education and student achievement, and human development services and help families navigate a path toward stability and success.

The team and its partners collaborate to offer Aging Well strategies that allow residents to age-in-place with dignity and maintain the same or better quality of life through access to programs and services. Another area of collaboration focuses on education and achievement for AH-assisted youth. Other collaborations include administration of Home Again, a successful proactive intervention that provides short-term housing assistance to prevent homelessness and HDS also implementing Community Outreach Plans for families referred for self-sufficiency or supportive services assistance.

### **FY 2022 Highlights:**

- Through collaboration with the Housing Choice Voucher Program, assist and monitor the voucher commitment of tenant-based vouchers (TBVs) designated for the Flow initiative led by Partners for Home (the Atlanta Continuum of Care), which includes collaboration with Mercy Care, Grady Health Systems, and the United Way of Atlanta.
- Continue to strengthen AH's Integrated Care for Permanent Supportive Housing (ICPSH) Program designed to follow an integrated care model to serve chronically homeless individuals who have complex medical and behavioral health needs and who routinely engage with emergency systems.
- Provide short-term housing assistance to 250 eligible families.
- Support youth directed programs that award up to 30 scholarships to youth residing in AH-assisted households.
- Select up to 20 high school seniors and college students calling AH-assisted units home for its summer internship program.
- Assist families that are non-compliant with AH's Work/Program Requirement become compliant. Families are primarily referred by AH's Housing Choice Voucher (HCV) Program.

## Planned Goals and Objectives

Under this element, AH reflects existing activities that AH plans to administer, implement, or accomplish over the next 12 months (July 1 – June 30).

### A. Short-Term MTW Goals and Objectives

A primary goal of AH during FY 2022 is to **keep families** that call one of nine AH-Owned communities home – **safe!** This includes such measures as keeping residents informed, keeping property management developers (PMDs) trained, meeting and exceeding housing quality standards (HQS), and providing personal protective equipment (PPE) to residents, among other things. Such measures may utilize existing HUD-approved MTW activities, as well as non-MTW activities outlined the CARES Act and HUD guidance.

In addition to accomplishing the primary goal, AH will focus on operational goals that affect AH residents and rental assistance program participants by continuing **efficient and effective administration of existing MTW Activities**, which includes revisiting established AH innovations and existing agreements to ensure their alignment with current AH direction and business model. In the meantime, AH plans to administer the following MTW Activities in FY 2022:

- \$125 Minimum Rent
- Earned Income Disregard
- Work/Program Requirement
- Enhanced Inspection Standards
- Good Neighbor Program II
- Human Development Services
- Develop Alternate and Supportive Housing Resources
- Revitalization Program
- Gap Financing
- HomeFlex Site-Based Administration
- Re-Engineering the Housing Choice Voucher Program
- Comprehensive Homeownership Program
- HomeFlex as a Strategic Tool
- Rent Simplification/AH Standard Deduction
- Leasing Incentive Fee
- Energy Performance Contracting
- HCV Program HAP Abatement Policy
- Aging Well Program
- Veterans Supportive Housing

Further, goals planned by AH for FY 2022 include continued utilization of MTW Activities designed to prepare AH residents and program participants for **life after rental assistance**, assist in the **prevention of homelessness**, and **increase the affordable housing stock** and housing options for low-income families within the AH's service jurisdiction. For existing MTW Activities, AH refers the reader to Section IV.A.: Implemented Activities.

Through continued review of existing MTW Activities, AH may consolidate similar activities, modify older activities, or close out obsolete activities that AH will discuss in detail in its FY 2022 MTW Annual Report. In addition to administering existing MTW Activities, AH includes **new MTW Activities** under Section III. Proposed MTW Activities: HUD Approval Requested of this document.

## B. Short-Term Non-MTW Goals and Objectives

Goals and objectives listed here do not modify PH or HCV program rules. Therefore, AH considers these activities as non-MTW goals and objectives. Activities include implementing and administering activities/projects that promote the **efficient and effective delivery of housing services and provision of affordable housing choices** for existing, new, and future program participants. Below, AH highlights ongoing and planned activities.

- Plan and **implement safety measures at AH-owned facilities**, which includes corporate and satellite offices, as well as housing communities. Apply four guiding priorities:
  - 1) Health and safety of residents, 2) Property viability, 3) Compliance, and 4) Redevelopment through the RAD Program in administering and updating preventive maintenance schedules and capital improvement projects.
  - **Manage AH-initiated substantial rehabilitation and significant modernization projects** at AH-Owned communities to meet conversion requirements under the RAD Program.
  - **Administered NSPIRE inspection method** at AH-Owned communities.
- Continue to **ensure contractual compliance and oversee diversity and inclusion efforts** where AH funding awards are involved.
- Include and **prioritize sustainability awareness** and practice in procurement policies and hiring practices.
- Develop, in collaboration with AH teams, strategies that ensures AH, its vendors, and partners **comply with the new Section 3 rule** (proposed as 24 CFR part 75<sup>8</sup>) before or by the expiration of the published transition period and compliance date.
- Review strategies to **optimize cost savings, which includes revenue-generating ideas and streamlining processes** commanding AH resources.
- Continue to **monitor and report COVID-19 related expenditures**, whether through the spending of CARES Act funding or the utilization of COVID-19 Waivers.
- Collaborate with external partners and AH teams to **investigate strategies that ensure local programs are accessible and remain accessible to low-income families**.
- Closely **monitor short-term and long-term homeless prevention assistance** to re-set future AH resources as appropriate.
- **Implement HUD's EnVision Program** to provide a range of educational and supportive services to AH clients under AH's Human Development Services component.
- Complete or advance, with external support, AH Green Initiative, including:
  - **Job-training program design** to assist residents improve and increase relevant skills and expose them to **green sector employment opportunities**.
  - **Establish a preferential AH Buyers Club** with home improvement retailers for AH program partners.
- **Monitor ongoing assistance and operations** to mitigate the associated impact of COVID-19. Assistance includes helping to meet the rapidly changing needs of families most affected by the pandemic.
- **Support AH's Family Self-Sufficiency (FSS) Program** and related activities.
- **Ensure that AH retains the best programs and refers participants to such programs** through review of all performance outcomes attended by participants.
- **Ensure that AH staff is able to telework effectively** with issued equipment and adequate security including the safe maintenance of personal identification information (PII) during transition to re-occupy AH offices.
- Secure external support for a 3-pronged approach to **close the digital divide**, which includes the provision of low-cost/no cost internet service, issuance of digital devices (e.g., laptops, tablets, etc.), and technology training.

<sup>8</sup> Federal Register/Vol. 85, No. 189/Tuesday, September 29, 2020

- Review the 3-pronged approach and other initiatives to avoid duplication of services while identifying potential cost savings and building staff capacity.
- **Activate new Annual Contributions Contract (ACC) Public Housing units under HUD's Faircloth Limits<sup>9</sup>.**
  - Issue of a Notice of Funding Availability (NOFA) seeking proposals for development projects using ACC/PH funding.
  - Development **projects on AH vacant land is a priority.**
- Train HQS Inspectors on energy and utility audits to **help HomeFlex residents lower their utility costs.**
- Complete and **lease up new or rehabilitated projects:**
  - Capitol View
    - 40 HomeFlex units and 24 HAVEN units
  - Herndon Square – Senior
    - 97 HomeFlex units, up to
  - London Townhomes
    - 200 HomeFlex units, up to
  - 8 Permanent Supportive Housing (PSH) projects
    - 145 HomeFlex Supportive Housing (HAVEN)
- Design **tracking tool to record performance** of AH's Biennial HQS Inspection Schedule-HomeFlex.
- Complete planned owner-occupied exterior home repairs under the Choice Heritage project.
- Initiate or complete **construction and the lease up of new projects:**
  - 72 units at Scholars Landing Phase III, Ashley IC, complete and lease up.
  - 112 units at Scholars Landing Phase IV, Ashley II, initiate construction.
  - 33 units at Scholars Landing Phase V, Homeownership, initiate construction.
  - Ensure that former residents of University Homes receive the first opportunity to return to Scholars Landing. Update resident re-occupancy process for Ashley IC.
- Continue to **strengthen partnerships** with municipal, county, and state agencies, as well as the Atlanta University (AU) Center schools, the Arthur M. Blank Foundation, Westside Future Fund, and other UCN partners. AU schools include Clark Atlanta University, Morehouse College, Morehouse School of Medicine, and Spelman College.
- Continue the **delivery of supportive services by UCN case managers and partners** that connect individuals and families to coaching and counseling, health and wellness, workforce development and employment, early childhood development, before, after, and summer school programming, STEM/STEAM programming, college preparatory and continuing education, and aging-in-place activities.
- **Maintain and update Choice website** to ensure the most accurate information is available for Choice families, vendors, and partners.
- **Continue community engagement activities** to support increased participation in the UCN, resident and community capacity building, and civic engagement. Planned activities include:
  - Award Choice scholarships and micro-grants, investments in training and mentoring, and conducting outreach activities.
  - Continue implementation of the Critical Community Improvements (CCI) Plan.
  - Conduct community engagement activities to bring awareness to residents and neighbors.
  - Continue to acquire blighted and deteriorated properties in the UCN utilizing CNIG funds.
- **Complete rehabilitation of Roosevelt Hall.**

<sup>9</sup> AH's Faircloth Limit is 9,140 Public Housing units.

- Closely monitor recently created HAVEN programs to **ensure voucher utilization** and successful performance.
  - Integrated Care Permanent Supportive Housing.
  - RISE-II.
  - 5-year Mainstream.
- Implement AH Buyers Club with local home improvement suppliers.
- Make landlord participation easier by enhancing **online Landlord Briefing and Digital Property Owner Application**.
- Increase landlord awareness of their role in helping to reduce the impact of climate change.
- Train AH HQS Inspectors on energy and utility audits to **help Housing Choice residents lower their utility costs**.
- Add 234 new families (net).
  - Process **1,074 new tenant-based families**.
  - Process 840 attrition TBVs.
    - **Allocate up to 30% of turnover TBVs** for RAD PBV families.
    - **Allocate up to 70% of turnover TBVs** for HCV waiting list families.
  - **Improve Request for Tenancy Approval (RTA) cycle time**.
- Continue to **service remaining 18 HCV Homeownership Program families**.
  - All prospective HCV homebuyers are referred to AH's Homebuyers Program.
- Design **tracking tool to record performance** of AH's Biennial HQS Inspection Schedule-Housing Choice.
- Complete due diligence, planning and development of **affordable housing on AH vacant land** consistent with the agency vision and mission and community input (*timetables are ultimately dependent on financial markets, investors, and availability of low-income housing tax credit (LIHTC) funding*).
  - **SONO/301**. Complete financial closing and begin construction of 300 units.
  - **Bankhead**. Initiate feasibility assessment for development of a mix-use or mix-income project that may include utilization of modular construction.
  - **Bowen**. Complete environmental and remediation work.
    - Execute two year HUD 2020 Choice Neighborhoods Planning Grant to develop a community-driven master plan for the site and the surrounding neighborhood.
  - **Civic Center**. Finalize community driven master plan for mixed-income, mixed-use development with feasibility assessment for preservation of historic building for performing arts center. Establish public private partnerships to develop and operationalize the plan. Continue lease agreements and initiate land transactions with neighbor SouthFace.
  - **Englewood Manor (South)**. Complete infrastructure development.
    - 200 rental units; complete financial closing and begin multifamily construction.
  - **Englewood North**. Complete land swap with city of Atlanta
    - Jonesboro South public housing site for acreage adjacent to the Atlanta Beltline.
    - Dispose of land to City for a three-year lease to allow site operations to close down.
  - **Herndon Homes**. Phase 2 is a mixed-income, mixed-use project:
    - 197 rental units; complete financial closing and begin construction.
  - **Scholars Landing (CNIG Program)** (unit count information shown on page 19 as well).
    - 72 rental units, complete construction at Phase III, Ashley IC.
    - 112 rental units, continue/start construction at Phase IV, Ashley II.
    - 33 homeownership units, complete financial closing at Phase V of site.

- **West Atlanta Development: Hollywood/Johnson Road Sites.** Issue a Request for Proposal (RFP) for development partners and execute a master development agreement.
- **Westside Properties (Magnolia Perimeter).** Three phase development with three developers to provide:
  - 20 rental units
  - 17 homeownership units.
- **Option Properties (Capitol, Carver, Grady, and Harris vacant land).** These properties are subject to on-going litigation and AH may dispose of properties through ground lease or land sales to the development partner. Please see page TBD of Appendix E for planned dispositions and demolitions.
- Complete due diligence, planning and implementing development-related partnership arrangements in support of **AH's Co-Investment Program** with various agencies, organizations, or developers as aligned with MTW flexibilities and as approved by HUD as Local Non-Traditional MTW Development activities and consistent with agency mission and vision and community input (*timetables are dependent on financial markets, investors, and availability of LIHTC funding*).
  - **Beltline Crossing I** (East Medina Village). Continue construction of 250 units.
  - **Flats at Stone Hogan.** Complete financial closing and begin construction of 256 units.
  - **Harmony at Bakers Ferry.** Continue construction of 108 units.
  - **Heritage Village at West Lake.** Continue construction of 102 units.
  - **London Townhomes.** Complete construction or substantial rehabilitation.
    - Transition 200 unit project to lease up and re-occupancy phase.
  - **Madison Reynoldstown** (890 Memorial Drive). Continue construction of 116 units.
  - **Villas at Stone Hogan.** Continue construction of 192 units.
  - **Sylvan Hills II.** Complete financial closing and begin construction of 200 units.
- **Homeownership Development at West Highlands, Englewood, Mechanicsville, Westside or Magnolia Perimeter Properties.** Upon approval of an updated Homeownership Plan that supports development of affordable and market rate housing on AH-owned land and utilizing fee-simple land sales or a land trust form of ownership to offer long-term affordability, AH will work with developers to close on land sales and initiate construction on:
  - 25 units at Mechanicsville (25 units)
  - 17 units (noted earlier) at Westside Properties
  - 167 units at West Highlands (3B South/2000 Perry)
  - 30 units at West Highlands pursuant to existing agreement

Land sales, construction and homeownership **closings may include reduced land value, an AH investment and AH down payment assistance to support affordability.** In addition, AH will encourage long-term affordability in its homeownership program through land disposition, investments, and partnership with land trusts.
- **Acquisitions.** AH may seek to acquire developed and undeveloped parcels to preserve or increase the supply of affordable housing, particularly in communities of opportunity, to ensure long-term affordability. Activity may include land donations or acquisitions from other public agencies, developers, non-profits and private citizens and may include advantageous tax treatment based on the development of affordable housing on the site. **AH will make such acquisitions that provide an advantage to AH or are part of a redevelopment plan.** Where beneficial, AH will identify alternate sources of capital to finance the acquisition, which may include bonds, loans and private equity investments.

- Review current underwriting and Homeownership Program
  - Align procedures and practices with industry standards and eliminate obsolete activities.
  - Align policies and procedures with industry standards and AH sustainability needs.
- Target home construction that are representative and reflective of AH's mission.
- Support community oriented housing initiatives, such as Project Shield and others, in accordance with intergovernmental agreements and agency direction. Adopt policies, procedures, and/or guidelines to address/meet program specific initiative requirements.
- Support LIHTC tax credit application of 4% or 9% by development partners for development of Ashley Scholars Landing II.
  - Update AH underwriting model to factor income averaging, "twinning", and other new issues/developments with 4% and 9% tax credits.
- Underwrite and manage closing activities:
  - Ashley Scholars Landing IC
  - Ashley Scholars Landing II.
- Underwrite and manage RAD closings that convert portfolio units to Section 8 assisted units:
  - Columbia Village units to support the renovation of mixed-income units.
  - Villages at Castleberry Hill II units to support the renovation of mixed-income units.
- Finalize 10-year real estate financial forecast to help identify long-term capital needs.

## Long-Term Goals and Objectives

Under this element, AH reflects planned and potential activities that AH may advance, formally introduce, or amend over the next 13 to 60 months (July 1, 2022 – June 30, 2027).

### C. Long-Term MTW Goals and Objectives

MTW Activities listed below reflect innovations and initiatives consistent with meeting MTW Statutory Objectives. However, these **innovations and initiative must be vetted thoroughly and adopted** by AH's Board of Commissioners before submission to HUD and potential implementation.

- As part of AH's review of its existing MTW Activities, AH moved closer to the following action(s) and projected timelines regarding existing MTW Activities:
  - **Identify outdated, obsolete MTW Activities** for revision or closeout, where June 30, 2022 and later ensures obsolescence.
  - **Review performance of revised Work/Program Requirement** as aligned to employers' scheduling practices in FY 2022 to learn if program compliance increases/decreases.
  - **Identify low or weak performing MTW Activities for revision or closeout** beginning in FY 2023, where the projected timeline permits data collection to support proper action.
- Future MTW Activities for consideration may include:
  - **Modular Housing Initiative** encapsulates AH's housing construction efforts, where AH may manufacture homes, sell lots, and service mortgages.
  - **Increase rent burden cap** to permit families to contribute more to increase housing choices.
  - **Simplified Utility Allowance Schedule**, where activity may;
    - Reduce calculation errors because of different structures and types of utility services.
    - Encourage program participants to seek energy efficient units.
  - Continued identification of current processes and housing stock evaluation to formulate and **design MTW activities that benefit AH-assisted families, AH, and communities in AH's service jurisdiction** while meeting MTW Statutory Objectives.
  - Investigate opportunities to **become a Regional MTW PHA** once this designation is formally established and support of the MTW Program.

## D. Long-Term Non-MTW Goals and Objectives

In addition to the planned MTW goals and objectives shared earlier, primary non-MTW goals and objectives include implementing and administering activities/projects that promote the **efficient and effective delivery of housing services and provision of affordable housing choices** for existing, new, and future program participants. Below, AH highlights planned activities for FY 2022 by business unit.

- **Advance exploration of AH Green Initiative**, which is an intentional coordination of committing resources towards reducing utility costs and improving energy efficiency.
- **Review revenue-generating opportunities** of AH-Owned/controlled assets and mitigate risk.
  - Conduct cost-benefit analysis of AH Green Initiative.
  - Explore financial feasibility of solar panel installations.
  - Lease of vacant lots and air space for community events and communication towers.
  - Optimize cost savings through new, revised, or deleted processes and activities.
- **Continue project management supportive functions** in the RAD conversion process through the completion of substantial rehabilitation or significant modernization of public housing units.
- Set up periodic review of strategies to ensure AH, its vendors, and partners **continue compliance with new Section 3 rule** (proposed as 24 CFR part 75<sup>10</sup>).
- Review outcome performance of partner programs based on attendance, costs, success, and other metrics to support continuation, contractual revision, or contract end.
- Pursue events for AH Cares volunteer corps pursuant to staff interest/participation while continuing to highlight events that assist residents, improve the community and adjacent areas.
- Continue to secure external support for a 3-pronged approach to close the digital divide.
- Improve utility efficiency ratings at all AH-Owned properties.
  - Maximize energy and water efficiency in RAD conversions.
  - Encourage existing and future landlord partners to improve the utility efficiency at rentals.
- Explore strategies to acquire existing properties from owners planning to sell their properties (or interest) that no longer desire to participate in the HomeFlex Program.
  - Consider utilizing AH's HCV waiting list to assist in filling vacant or hard to fill HomeFlex units.
- Review and revise, as applicable, an updated conversion schedule for the remaining public housing communities scheduled for subsidy conversion assistance under the RAD Program.
- Continue to support activities associated with updating and advancing University Choice Neighborhood (UCN) transformation plans and efforts.
  - Include promoting and advancing mixed-income development efforts.
  - Conduct activities to complete remaining development phases.
    - Phase IV, Scholars Landing, Ashley II.
    - Phase V Scholars Landing, Homeownership.
    - Advancing project phases may include disposition of AH-Owned land, public infrastructure/improvement work, and other predevelopment activities.
- Design incentive program to implement based on collected data and research that promotes a culture of work and education.
  - Increase resident employment, wage earnings, training enrollment, and similar economic independence and housing self-sufficiency activities.
  - Consider income disregards to help new workers and returning workers to stabilize.
  - Consider transportation and childcare assistance.
  - Consider stipends and grants for job-related uniforms, tools, and equipment.

<sup>10</sup> Federal Register/Vol. 85, No. 189/Tuesday, September 29, 2020

- Investigate, and where feasible, implement internet access opportunities to eligible households through Connect Home or other initiatives.
- Implement supportive services, life-long learning, and community engagement programming at Roosevelt Hall once rehabilitation of the building is complete.
- Promote residential and commercial growth in the UCN through collaborative efforts with Choice Neighborhoods partners.
- Make strategic and deliberate investments to attract and retain residents, support community serving facilities, and projects that enhance public safety and quality of life.
- Continue to work collaboratively with other agencies to implement and potentially administer real estate activities under an aligned co-investment framework that supports low-income families and mutually beneficial to AH.
- Incorporate green development criteria and standards into new development design and plans
  - Increase the percentage of new AH units that achieve some level of green certification.
  - Promote/install green infrastructure within new development scheme or non-housing areas and activities.
- Continue self-development efforts to position AH to engage in construction lending, asset ownership and management, and other self-development activities
  - Build capacity to engage in community development projects that enhance or create amenity-rich neighborhoods.
- Identify new sources of funding and partners to continue AH Co-investment Program.
  - Seek new sources of funding and partners to support neighborhood revitalization through HUD Choice Neighborhoods Planning or Implementation Grants for Bowen Homes and Thomasville Heights; to support infrastructure and environmental sustainability; and community revitalization.
  - Execute master developer agreement for Palmer House project and initiate building design for closing in FY 2023.
  - AH will initiate planning for homeownership development at Englewood to develop 81 units in FY 2023.
- Identify and develop financial vehicles in pursuit of creating an investment vehicle for long-term development of affordable residential communities or creation of areas of opportunities as part of its community revitalization efforts.
  - AH to generate a return on investments and create a sustainable organization to increase the affordable housing stock in Atlanta.
  - Research opportunities to diversify development partnerships and investments that include commercial real estate development and commercial business ventures.
  - Seek, identify, and utilize alternative funding options, such as grant awards, local funds, public funds, and similar funding streams for ongoing and future revitalization activities.

- Consider appropriate application of all elements or parts of the Housing Opportunities through Modernization Act (HOTMA) guidance to maximize creation and preservation of affordable units.
- Research efforts that increase homeownership and proposes solutions that improve housing affordability in accordance with intergovernmental agreements and agency direction
- Review and explore opportunities to streamline processes while increasing the number of opportunities to serve families with the same level of funding or less.
- Explore solutions to ensure long-term sustainability of AH's underwriting and Homeownership Program activities while positioning AH to assist more low-income families.

DRAFT

## II. GENERAL OPERATING INFORMATION

### A. HOUSING STOCK INFORMATION

#### i. Planned New Public Housing Units

New public housing units that the MTW PHA anticipates will be added during the Plan Year.

ASSET MANAGEMENT PROJECT (AMP) NAME AND NUMBER	BEDROOM SIZE						TOTAL UNITS	POPULATION TYPE*	# of Uniform Federal Accessibility Standards (UFAS) Units	
	0/1	2	3	4	5	6+			Fully Accessible	Adaptable
N/A	0	0	0	0	0	0	0	N/A	0	0
N/A	0	0	0	0	0	0	0	N/A	0	0
N/A	0	0	0	0	0	0	0	N/A	0	0

Total Public Housing Units to be Added in the Plan Year 0

\* Select "Population Type" from: General, Elderly, Disabled, Elderly/Disabled, Other

If "Population Type" is "Other" please describe:

N/A

#### ii. Planned Public Housing Units to be Removed

Public housing units that the MTW PHA anticipates will be removed during the Plan Year.

AMP NAME AND NUMBER	NUMBER OF UNITS TO BE REMOVED	EXPLANATION FOR REMOVAL
Cosby Spear Highrise/Number	282	PH units converted to PBV units under the RAD Program
East Lake Highrise/Number	149	PH units converted to PBV units under the RAD Program

431

Total Public Housing Units to be Removed in the Plan Year

**iii. Planned New Project-Based Vouchers**

Tenant-based vouchers that the MTW PHA anticipates project-basing for the first time during the Plan Year. These include only those in which at least an Agreement to enter into a Housing Assistance Payment (AHAP) will be in place by the end of the Plan Year. Indicate whether the unit is included in the Rental Assistance Demonstration (RAD).

PROPERTY NAME	NUMBER OF VOUCHERS TO BE PROJECT-BASED	RAD?	DESCRIPTION OF PROJECT
1055 Arden	11	No	PBV unit creation under AH's HAVEN HomeFlex Program
1265 Lakewood	16	No	PBV unit creation under AH's HAVEN HomeFlex Program
55 Milton	18	No	PBV unit creation under AH's HAVEN HomeFlex Program
Abbingtion at Ormewood Park	8	No	PBV unit creation under AH's HAVEN HomeFlex Program
Covenant House	30	No	PBV unit creation under AH's HAVEN HomeFlex Program
Cosby Spear Highrise	282	Yes	PH units converted to PBV units under the RAD Program
East Lake Highrise	149	Yes	PH units converted to PBV units under the RAD Program
Intrada Westside (DLH Development)	25	No	PBV unit creation under AH's HAVEN HomeFlex Program
The Mallory	14	No	PBV unit creation under AH's HAVEN HomeFlex Program
Thrive Sweet Auburn	23	No	PBV unit creation under AH's HAVEN HomeFlex Program

576

Planned Total Vouchers to be Newly Project-Based

#### iv. Planned Existing Project-Based Vouchers

Tenant-based vouchers that the MTW PHA is currently project-basing in the Plan Year. These include only those in which at least an AHAP is already in place at the beginning of the Plan Year. Indicate whether the unit is included in the Rental Assistance Demonstration (RAD).

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	PLANNED STATUS AT END OF PLAN YEAR*	RAD?	DESCRIPTION OF PROJECT
Adamsville Green	81	Leased/Issued	No	PBV unit creation under HAVEN: HomeFlex Supportive Housing Program
Arcadia at Parkway Village	116	Leased/Issued	No	PBV unit creation under AH's HomeFlex Program
Ashley Auburn Pointe I	8	Leased/Issued	No	PBV unit creation under AH's HomeFlex Program
Ashley I at Scholars Landing	54	Leased/Issued	No	PBV unit creation under AH's HomeFlex Program
Ashton at Browns Mill	79	Leased/Issued	No	PBV unit creation under AH's HAVEN Program
Atrium at CollegeTown	114	Leased/Issued	No	PBV unit creation under AH's HomeFlex Program
Auburn Glen	108	Leased/Issued	No	PBV unit creation under AH's HomeFlex Program
Avalon Park Family	53	Leased/Issued	No	PBV unit creation under AH's HomeFlex Program
Avalon Park Senior	136	Leased/Issued	No	PBV unit creation under AH's HomeFlex for Older Persons Program
Avalon Ridge Family	89	Leased/Issued	No	PBV unit creation under AH's HomeFlex Program
Brightstone at DeKalb Medical Parkway	175	Leased/Issued	No	PBV unit creation under AH's HomeFlex Program
Campbell Stone	201	Leased/Issued	No	PBV unit creation under AH's HomeFlex Program
Capitol Gateway II	16	Leased/Issued	No	PBV unit creation under AH's HomeFlex Program
Centennial Place I	74	Leased/Issued	No	PBV unit creation under AH's HomeFlex Program
Centennial Place II	70	Leased/Issued	No	PBV unit creation under AH's HomeFlex Program
Centennial Place III	74	Leased/Issued	No	PBV unit creation under AH's HomeFlex Program
Centennial Place IV	83	Leased/Issued	No	PBV unit creation under AH's HomeFlex Program
Columbia Colony Senior	62	Leased/Issued	No	PBV unit creation under AH's HomeFlex for Older Persons Program
Columbia Commons	15	Leased/Issued	No	PBV unit creation under AH's HomeFlex Program
Columbia Commons	48	Leased/Issued	Yes	PH units in Mixed Community converted to PBV units via the RAD Program
Columbia Creste	61	Leased/Issued	Yes	PH units in Mixed Community planned to convert to PBV units via the RAD Program – extended to FY 2021

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	PLANNED STATUS AT END OF PLAN YEAR*	RAD?	DESCRIPTION OF PROJECT
Columbia Estates	50	Leased/Issued	Yes	PH units in Mixed Community converted to PBV units via the RAD Program
Columbia Grove	56	Leased/Issued	Yes	PH units in Mixed Community planned to convert to PBV units via the RAD Program – extended to FY 2021
Columbia Heritage	124	Leased/Issued	No	PBV unit creation under AH's HomeFlex Program
Columbia High Point (Senior)	94	Leased/Issued	No	PBV unit creation under AH's HomeFlex for Older Persons Program
Columbia Mechanicsville Apartments	35	Leased/Issued	No	PBV unit creation under AH's HomeFlex Program
Columbia Mechanicsville Apartments	62	Leased/Issued	Yes	PH units in Mixed Community converted to PBV units via the RAD Program
Columbia Park Citi	61	Leased/Issued	Yes	PH units in Mixed Community converted to PBV units via the RAD Program
Columbia Senior Residences	54	Leased/Issued	Yes	PH units in Mixed Community converted to PBV units via the RAD Program
Columbia Senior Residences at Blackshear	78	Leased/Issued	No	PBV unit creation under AH's HomeFlex for Older Persons Program
Columbia Senior Residences at Edgewood	135	Leased/Issued	No	PBV unit creation under AH's HomeFlex for Older Persons Program
Columbia Senior Residences at Mechanicsville	81	Leased/Issued	No	PBV unit creation under AH's HomeFlex for Older Persons Program
Columbia Senior Residences at M. L. King, Jr.	122	Leased/Issued	No	PBV unit creation under AH's HomeFlex for Older Persons Program
Columbia South River Gardens	51	Leased/Issued	No	PBV unit creation under AH's HomeFlex Program
Columbia Sylvan Hills	76	Leased/Issued	No	PBV unit creation under AH's HAVEN Program
Columbia Tower at Martin Luther King, Jr. Village	95	Leased/Issued	No	PBV unit creation under AH's HAVEN Program
Columbia Village	30	Committed	Yes	PH units in Mixed Community planned to convert to PBV units via the RAD Program – extended to FY 2021
Constitution Avenue Apartments	67	Leased/Issued	No	PBV unit creation under AH's HomeFlex Program
Crogman School Apartments	45	Leased/Issued	No	PBV unit creation under AH's HomeFlex Program

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	PLANNED STATUS AT END OF PLAN YEAR*	RAD?	DESCRIPTION OF PROJECT
Gateway at East Point	100	Leased/Issued	No	PBV unit creation under AH's HomeFlex Program
GE Tower	189	Leased/Issued	No	PBV unit creation under AH's HomeFlex Program
Hightower Manor Highrise	129	Committed	Yes	PH units in AH-Owned Community planned to convert to PBV units via the RAD Program – extended to FY 2021
Heritage Green	44	Leased/Issued	No	PBV unit creation under AH's HomeFlex Program
Heritage Station I	88	Leased/Issued	No	PBV unit creation under AH's HomeFlex Program
Heritage Station II	150	Leased/Issued	No	PBV unit creation under AH's HomeFlex Program
Imperial Hotel	90	Leased/Issued	No	PBV unit creation under AH's HAVEN Program
Lakewood at Christian Manor	199	Leased/Issued	No	PBV unit creation under AH's HomeFlex Program
Legacy at Vine City	105	Leased/Issued	No	PBV unit creation under AH's HomeFlex Program
Lillie R. Campbell House	60	Leased/Issued	No	PBV unit creation under AH's HomeFlex Program
Manor at Scott's Crossing	100	Leased/Issued	No	PBV unit creation under AH's HomeFlex Program
Marietta Road Highrise	129	Leased/Issued	Yes	PH units in AH-Owned Community converted to PBV units under RAD
Martin House at Adamsville	111	Leased/Issued	No	PBV unit creation under AH's HomeFlex Program
Mechanicsville Crossing	30	Leased/Issued	No	PBV unit creation under AH's HomeFlex Program
Mechanicsville Crossing	68	Leased/Issued	Yes	PH units in Mixed Community planned to convert to PBV units via the RAD Program – extended to FY 2021
Mechanicsville Station	35	Leased/Issued	No	PBV unit creation under AH's HomeFlex Program
Mechanicsville Station	63	Leased/Issued	Yes	PH units in Mixed Community planned to convert to PBV units via the RAD Program – extended to FY 2021
Oasis at Scholars Landing	60	Leased/Issued	No	PBV unit creation under AH's HomeFlex for Older Persons Program
Odyssey at Villas	32	Leased/Issued	No	PBV unit creation under AH's HAVEN Program
O'Hern House	76	Leased/Issued	No	PBV unit creation under AH's HAVEN Program

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	PLANNED STATUS AT END OF PLAN YEAR*	RAD?	DESCRIPTION OF PROJECT
Park Commons / Gates Park (HFOP)	152	Leased/Issued	No	PBV unit creation under AH's HAVEN Program
Park Commons / Gates Park (HFS)	129	Leased/Issued	No	PBV unit creation under AH's HAVEN Program
Parkside at Mechanicsville	32	Leased/Issued	No	PBV unit creation under AH's HomeFlex Program
Parkside at Mechanicsville VI	47	Leased/Issued	Yes	PH units in Mixed Community converted to PBV units via the RAD Program
Peachtree Road Highrise	196	Leased/Issued	Yes	PH units in AH-Owned Community converted to PBV units under RAD
Peaks at Martin Luther King, Jr.	73	Leased/Issued	No	PBV unit creation under AH's HomeFlex Program
Phoenix House	44	Leased/Issued	No	PBV unit creation under AH's HAVEN Program
Piedmont Road Highrise	207	Leased/Issued	Yes	Conversion of Senior PH units to PBV units under the RAD Program
Providence Parkway Village	50	Leased/Issued	No	PBV unit creation under AH's HomeFlex Program
Quest Village III	10	Leased/Issued	No	PBV unit creation under AH's HAVEN Program
Retreat at Edgewood	40	Leased/Issued	No	PBV unit creation under AH's HomeFlex Program
Reynoldstown Senior Residences	26	Leased/Issued	No	PBV unit creation under AH's HomeFlex for Older Persons Program
Seven Courts	30	Leased/Issued	No	PBV unit creation under AH's HAVEN Program
Spring View Apartments	24	Leased/Issued	No	PBV unit creation under AH's HomeFlex Program
Sterling at Candler Village	170	Leased/Issued	No	PBV unit creation under AH's HomeFlex Program
Summerdale Commons	50	Leased/Issued	No	PBV unit creation under AH's HAVEN Program
Summit Trail	40	Leased/Issued	No	PBV unit creation under AH's HAVEN Program
Tenth and Juniper	149	Leased/Issued	Yes	Conversion of Senior PH units to PBV units under the RAD Program
The Legacy at Walton Lakes	24	Leased/Issued	No	PBV unit creation under AH's HomeFlex Program
The Remington Apartments	160	Leased/Issued	No	PBV unit creation under AH's HomeFlex Program
The Renaissance at Park South – Senior	100	Leased/Issued	No	PBV unit creation under AH's HomeFlex for Older Persons Program
Veranda at Auburn Pointe	86	Leased/Issued	No	PBV unit creation under AH's HomeFlex Program
Veranda at Auburn Pointe II	98	Leased/Issued	No	PBV unit creation under AH's HomeFlex Program

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	PLANNED STATUS AT END OF PLAN YEAR*	RAD?	DESCRIPTION OF PROJECT
Veranda at Auburn Pointe III	102	Leased/Issued	No	PBV unit creation under AH's HomeFlex Program
Veranda at Carver	90	Leased/Issued	No	PBV unit creation under AH's HomeFlex Program
Veranda at CollegeTown	100	Leased/Issued	No	PBV unit creation under AH's HomeFlex Program
Veranda at Groveway	74	Leased/Issued	No	PBV unit creation under AH's HomeFlex Program
Veranda at Scholars Landing	100	Leased/Issued	No	PBV unit creation under AH's HomeFlex Program
Villages at Castleberry Hill I	66	Leased/Issued	Yes	Conversion of Senior PH units to PBV units under the RAD Program
Villages at East Lake I and II	271	Leased/Issued	Yes	PH units in Mixed Community converted to PBV units under RAD
Villas of H.O.P.E.	36	Leased/Issued	No	PBV unit creation under AH's HAVEN Program
Welcome House	41	Leased/Issued	No	PBV unit creation under AH's HAVEN Program
Woodbridge at Parkway Village	98	Leased/Issued	No	PBV unit creation under AH's HomeFlex Program

7,858

**Planned Total Existing Project-Based Vouchers**

\* Select "Planned Status at the End of Plan Year" from: Committed, Leased/Issued

**v. Planned Other Changes to MTW Housing Stock Anticipated During the Plan Year**

Examples of the types of other changes can include (but are not limited to): units held off-line due to relocation or substantial rehabilitation, local, non-traditional units to be acquired/developed, etc.

<b>PLANNED OTHER CHANGES TO MTW HOUSING STOCK ANTICIPATED IN THE PLAN YEAR</b>
AH plans to continue holding units off-line as a viable strategy to house program participants affected by AH's substantial rehabilitation and significant modernization efforts directly associated with its conversion plans to meet requirements under the Rental Assistance Demonstration (RAD) Program.

**vi. General Description of All Planned Capital Expenditures During the Plan Year**

Narrative general description of all planned capital expenditures of MTW funds during the Plan Year.

**GENERAL DESCRIPTION OF ALL PLANNED CAPITAL EXPENDITURES DURING THE PLAN YEAR**

AH plans to expend approximately **\$1.69M** for site and building improvements at **seven** AH-Owned properties. Planned expenditures include **the replacement of 78 package terminal air conditioning units, 2 water boiler systems, 9 dumpsters, 134 stoves and 135 refrigerators, 250 smoke detectors, common area HVAC rooftop unit, and emergency chiller and fire voice evacuation system replacements.**

In addition, planned capital expenditures include **cleaning exhaust ventilation ducts and motors, interior duct cleaning, concrete patio work, concrete/asphalt parking lot and walkway work, environmental work consistent with a Green Physical Needs Assessment (PNA), erosion control work, as well as plumbing valve upgrades, elevator upgrades/improvements, plumbing repairs/sewer allowance, and removal of mixing valves from water lines.**

AH, may also **purchase fleet vehicles or invest in equipment as part of its planned capital expenditures during the Plan Year. Purchases may replace aging vehicle or equipment and be assigned to staff, or designated as general fleet use.**

Other capital expenditures, such as buying furniture, fixtures, and other equipment, consistent with AH's established priorities, may also occur during the planning period. Listed below are the total estimated capital expenditures per site:

- **\$667,123 @ Cheshire Bridge Road Highrise**
- **\$273,000 @ Cosby Spear Highrise**
- **\$ 63,484 @ East Lake Highrise**
- **\$ 37,965 @ Georgia Avenue Highrise**
- **\$339,312 @ Marian Road Highrise**
- **\$308,466 @ Martin Street Plaza**
- **\$ 10,350 @ Westminster**

## B. LEASING INFORMATION

### i. Planned Number of Households Served

Snapshot and unit month information on the number of households the MTW PHA plans to serve at the end of the Plan Year.

PLANNED NUMBER OF HOUSEHOLDS SERVED THROUGH:	PLANNED NUMBER OF UNIT MONTHS OCCUPIED/LEASED*	PLANNED NUMBER OF HOUSEHOLDS TO BE SERVED**
MTW Public Housing Units Leased	21,252	1,771
MTW Housing Choice Vouchers (HCV) Utilized	236,736	19,728
Local, Non-Traditional: Tenant-Based <sup>^</sup>	3,000	250
Local, Non-Traditional: Property-Based <sup>^</sup>	32,040	2,670
Local, Non-Traditional: Homeownership <sup>^</sup>	16,776	1,398

#### Planned Total Households Served

309,804

25,817

\* "Planned Number of Unit Months Occupied/Leased" is the total number of months the MTW PHA plans to have leased/occupied in each category throughout the full Plan Year.

\*\* "Planned Number of Households to be Served" is calculated by dividing the "Planned Number of Unit Months Occupied/Leased" by the number of months in the Plan Year.

<sup>^</sup> In instances when a local, non-traditional program provides a certain subsidy level but does not specify a number of units/households to be served, the MTW PHA should estimate the number of households to be served.

LOCAL, NON-TRADITIONAL CATEGORY	MTW ACTIVITY NAME/NUMBER	PLANNED NUMBER OF UNIT MONTHS OCCUPIED/LEASED*	PLANNED NUMBER OF HOUSEHOLDS TO BE SERVED*
Tenant-Based	Developing Alternative and Supportive Housing Resources/SH.2005.09	3,000	250
Property-Based	Reformulating the Subsidy Arrangement in . . . AH's Affordable Communities/RE.2005.09	13,020	1,085
Property-Based	HomeFlex Site-Based Administration/RE.2006.02	19,020	1,585
Homeownership	Comprehensive Homeownership Program/RE.2007.03	16,776	1,398

\* The sum of the figures provided should match the totals provided for each local, non-traditional categories in the previous table. Figures should be given by individual activity. Multiple entries may be made for each category if applicable.

**ii. Discussion of Any Anticipated Issues/Possible Solutions Related to Leasing**

Discussions of any anticipated issues and solutions in the MTW housing programs listed.

HOUSING PROGRAM	DESCRIPTION OF ANTICIPATED LEASING ISSUES AND POSSIBLE SOLUTIONS
<p><b>MTW Public Housing</b></p>	<p>AH continued planned moratoriums on leasing activities at several of the AH-Owned communities in order to “checkerboard” resident movement to complete planned rehabilitation projects. In addition, the COVID-19 pandemic limited property management activities including lease-ups and evictions. Leasing issue solutions included exercising HUD-approved COVID-19 Waivers as guidance for our contracted property managers. AH also employed by-appointment, remote, and virtual strategies as solutions to leasing issues.</p>
<p><b>MTW Housing Choice Voucher</b></p>	<p>AH continued efforts to recruit and retain property owner partners, especially those with one and two-bedroom units. In addition, the COVID-19 pandemic limited voucher management activities including lease-ups, program terminations, and HQS inspections. As a solution, AH exercised HUD-approved COVID-19 Waivers as guidance for our property owner/manager partners and employed by-appointment, remote, and virtual strategies as solutions to leasing issues.</p>
<p><b>Local, Non-Traditional</b></p>	<p>AH continued efforts to recruit and retain property owner partners willing to provide temporary to permanent supportive housing for an at-risk segment of the population. AH’s short-term and long-term solutions include actively marketing its HAVEN Program and completion of planned development projects to add units to the housing stock.</p>

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## C. WAITING LIST INFORMATION

### i. Waiting List Information Anticipated

Snapshot information of waiting list data as anticipated at the beginning of the Plan Year. The “Description” column should detail the structure of the waiting list and the population(s) served.

WAITING LIST NAME	DESCRIPTION	NUMBER OF HOUSEHOLDS ON WAITING LIST	WAITING LIST OPEN, PARTIALLY OPEN OR CLOSED	WAS THE WAITING LIST OPENED DURING THE PLAN YEAR
MTW Housing Choice Voucher Program	Community-wide voucher WL for all populations.	24,505	Closed	No
Choice Mobility Vouchers (RAD PBV Program)	Specific voucher WL for eligible residents living at converted PH sites.	3	Partially Open	Yes
MTW Public Housing Program	Community-wide unit WL for all populations managed by a third party at the property level for 9 AH-Owned sites.	1,748	Partially Open	Yes
Site-Based Administration – HomeFlex and Mixed Communities	Community-wide unit WL for all population managed by property owners at the property level for nearly 10,040 units at 111 sites.	47,710	Closed	No

Please describe any duplication of applicants across waiting lists:

AH does not discourage families from applying to sites in which they are interested. Therefore, there may be instances where families appear on multiple WLs. For example, a family may appear on the MTW HCV WL as well as a site-based WL managed by property owners or property management agents. AH does however monitor subsidy assistance to avoid/correct duplicative subsidy issuances. In the meantime, AH employs a date and time stamp process to receive applications and then administers a “lottery” that randomly selects families. A residency/employment policy ensures local families are issued an AH voucher before non-Atlanta residents or residents not employed with the city of Atlanta.

### ii. Planned Changes to Waiting List in the Plan Year

Please describe any anticipated changes to the organizational structure or policies of the waiting list(s), including any opening or closing of a waiting list, during the Plan Year.

WAITING LIST NAME	DESCRIPTION OF PLANNED CHANGES TO WAITING LIST
MTW Housing Choice Voucher	N/A
Choice Mobility Voucher (RAD Project-Based Vouchers)	N/A
Site-Based – Assorted Properties	N/A

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### III. PROPOSED MTW ACTIVITIES: HUD Approval Requested

#### AW.2022.01 – ELIMINATION/REDUCTION OF INTERIM CERTIFICATIONS

##### A. Activity Description

###### i. Describe the Proposed Activity.

Through this activity, AH plans to eliminate or reduce the number of interim certifications that it conducts annually by **limiting interim certifications during the year and prohibiting interims 90-days before and 90-days after** a participant's effective annual date. As of June 30, 2019, AH's Housing Choice Voucher (HCV) staff and its Property Management Developer (PMD) partners conducted over 20,500 examinations and estimates that it spends in excess of two-hours for each examination.

Under this activity, AH expects to improve process efficiencies and increase staff productivity by reducing the number of examinations conducted annually through elimination or limitation. AH and PMD staff spend an inordinate amount of time, over 7,000 hours conducting interim certifications on families that it just completed an intake or annual certification. AH anticipates a significant reduction in those hours through administration of this activity.

AH will review written hardship requests on a case-by-case basis in accordance with its hardship policy. AH's hardship definition includes Violence Against Women Act (**VAWA**) cases, Victim Witness Assistance cases, medical cases, and similar hardship instances. The **addition/subtraction of new family members does not constitute a hardship** to conduct an income-interim certification as outlined in Notice PIH 2016-05 (HA) Attachment N: Family Income and Composition: Regular and Interim Examinations.

###### ii. Describe how the proposed activity will achieve one or more of the three statutory objectives and the specific impacts on that statutory objective(s).

The proposed activity achieves the **Cost Efficiency MTW Statutory Objective** based on AH's data. Staff spends on average, in excess of 2 hours conducting new, annual, and interim eligibility certifications and conducts approximately 3,523 interims annually, which is almost one-third of the HCV Program participants. Therefore, **AH spends approximately 7,046 hours certifying families** that it already certified as a new program admission or existing annual certification. Changing the way AH conducts interims could save it the equivalent of **more than \$281,000 annually**.

Applying the same formula principles to AH's Public Housing (PH) and HomeFlex (HFX) Programs, since data from the PMDs was not readily available or accessible, AH estimates that PMD partners conduct about 2,859 interims annually. Using the same 2 hour certification time, AH estimates that **PMDs spend more than 5,718 hours annually certifying families** that it already certified as a new program admission or existing annual certification. Quantified in dollars, PMDs could save the equivalent of **more than \$228,000 by eliminating duplicative work as a result of changes to the way AH conducts interims**.

Under this activity, AH estimates that it could **save more than 12,700 hours annually by limiting interim certifications and prohibiting interims 90-days before and 90-days after** a participant's effective annual date. Through this activity, AH anticipates time for staff focus on new program intakes and existing program participant renewals, transfers, and non-compliant participants.

**iii. Provide the anticipated schedule for implementing the proposed activity.**

AH anticipates the following implementation schedule:

- July 1, 2021 – December 31, 2021: **notification and training period** to inform existing program participants and to train AH and PMD staff. AH will update software as well.
- January 1, 2022 – June 30, 2022: **'soft' implementation agency wide** to identify challenges and issues with full activity implementation and its administration.
- July 1, 2022 and forward: activity is **effective on participant's effective annual date**

**B. Activity Metrics Information**

**i. HUD Standard Metrics applicable to the proposed activity**

AH feels the following HUD Standard Metrics are applicable to this activity:

- CE #2: Staff Time Savings
- CE #3: Decrease in Error Rate of Task Execution

**ii. Baseline performance level for each metric prior to implementation of the proposed activity**

AH does not have any significant changes planned for this activity.

**iii. Give annual benchmark for each metric**

Baseline performance level for each metric prior to implementation of the proposed activity

**iv. If applicable, give long-term benchmark for each metric**

AH's long-term benchmark for this activity is to conduct only 5% of its program participant population as interim certifications. In other words, if HA's program population is 30,000, AH should only conduct 1,500 interim certifications annually.

**v. Give the data source from which the metric data will be compiled**

AH will compile activity metric data from proprietary software, internally maintained databases, and similar data collecting sources.

**C. Cost Implications**

**i. State whether the proposed activity will result in any cost implications (+/-) for the PHA.**

AH **does not anticipate** the proposed activity resulting in **any cost implication** for AH.

**ii. If the proposed activity does result in cost implications, provide an estimate of the amount and discuss how PHA will manage anticipated surplus or deficit.**

N/A.

**D. Need/Justification for MTW Flexibility**

**i. Cite the authorization detailed in Attachment C/D of the Standard MTW Agreement that gives the PHA the flexibility to conduct the proposed activity.**

AH utilizes MTW Authorization under Attachment D Section II: Restructure the Annual and Interim Review Process in Section 8 Assisted Housing, Housing Choice Voucher Program, Public Housing, and Homeownership of its Amended and Restated MTW Agreement.

**ii. Explain why the cited authorization is needed to engage in the proposed activity.**

AH needs to utilize the cited MTW Authorization to modify 24 CFR §960.257 Family Income and Composition: Annual and Interim Reexaminations and 24 CFR §982.516 Family Income and Composition: Annual and Interim Examinations to affect the frequency of reviews that differ from the requirements currently mandated in the 1937 Act.

**This is not a Rent Reform or Term Limit activity. Therefore, element E does not apply to this activity.**

**E. Rent Reform/Term Limit Information (if applicable)**

**i. Impact Analysis**

N/A

- (1) A description of how the proposed MTW activity will impact household rent/tenant share
- (2) A description of how the MTW PHA will implement and track the rent reform activity
- (3) Numerical analysis detailing the intended/possible impacts of the rent reform activity
- (4) A plan for how the MTW PHA will weigh the consequences/benefits of the rent reform activity to determine adjustments/terminations/reductions/expansions/continuations in the performance of the activity.

**ii. Hardship case criteria**

N/A

**iii. Descriptions of annual reevaluations**

N/A

**iv. Transition period**

N/A

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## AW.2021.02 – AH’S CONSTRUCTION LIMIT COSTS (CLC) SCHEDULE

### A. Activity Description

#### i. Describe the Proposed Activity.

AH operates in the ninth largest metropolitan statistical area (MSA)<sup>11</sup> in the United States and the MSA is growing 13.88% annually<sup>10</sup>. AH’s service jurisdiction includes all of the city of Atlanta and extends into neighboring cities and counties outside of the city’s boundaries (the MSA). The Atlanta MSA as one of the fastest growing MSAs<sup>12</sup> in the country and the MSA’s growth affects the city of Atlanta and its housing stock, ultimately causing AH to operate in an ultra-competitive real estate market.

Because of the MSA’s exceptional and steady annual growth, developers have constructed scores of market rate units, high-end retail shops, and commercial office space disregarding affordable housing. These factors create an increased need and set a premium on ‘buildable’ parcels for moderate to low-income families to find sufficient housing that meet their needs at affordable prices. Consequently, many of AH’s planned developments must be vertical construction, which carries a higher cost because of framing, underground parking, etcetera.

Accordingly, AH plans to use this activity to establish its own construction limit costs (CLC) schedule to contribute to development and redevelopment activities at a higher level. Therefore, under this activity, AH replaces HUD’s Housing Construction Cost (HCC) and Total Development Cost (TDC) Limits with AH’s CLC Schedule shown below (see page TBD of Appendix E for a comparison schedule).

AH's 2022 CONSTRUCTION LIMIT COSTS (CLC) SCHEDULE														
Bedroom Size	0		1		2		3		4		5		6	
	HCC	TDC												
Square Feet	500		700		900		1200		1500		1700		1900	
Building Type														
Detached/Semi-Detached	\$ 142,240	\$ 248,918	\$ 176,676	\$ 309,168	\$ 201,001	\$ 351,757	\$ 217,378	\$ 380,413	\$ 257,717	\$ 451,008	\$ 286,614	\$ 501,577	\$ 318,880	\$ 558,038
Row House	\$ 85,932	\$ 149,441	\$ 109,534	\$ 191,681	\$ 130,467	\$ 228,313	\$ 153,946	\$ 269,397	\$ 180,770	\$ 316,342	\$ 198,655	\$ 347,649	\$ 214,687	\$ 375,695
Walkup	\$ 103,024	\$ 180,286	\$ 133,348	\$ 233,354	\$ 167,082	\$ 292,400	\$ 227,042	\$ 397,328	\$ 274,550	\$ 480,461	\$ 309,809	\$ 542,162	\$ 344,787	\$ 603,379
Elevator	\$ 105,443	\$ 168,715	\$ 147,626	\$ 236,199	\$ 189,809	\$ 303,690	\$ 253,075	\$ 404,914	\$ 316,340	\$ 506,143	\$ 358,524	\$ 573,634	\$ 400,701	\$ 641,119
5-Story Wrap Around or Podium Midrise	\$ 136,450	\$ 233,550	\$ 177,245	\$ 303,251	\$ 215,112	\$ 367,550	\$ 266,075	\$ 453,766	\$ 321,680	\$ 548,111	\$ 360,501	\$ 614,069	\$ 399,705	\$ 680,697
5 to 9-Story Mezzanine (ISC Section 505)	\$ 150,095	\$ 256,905	\$ 194,970	\$ 333,576	\$ 236,623	\$ 404,305	\$ 292,683	\$ 499,143	\$ 353,848	\$ 602,922	\$ 396,551	\$ 675,476	\$ 439,675	\$ 748,767
>9-Story Mezzanine over retail/office space w/subterrean parking	\$ 172,609	\$ 295,441	\$ 224,215	\$ 383,612	\$ 272,117	\$ 464,951	\$ 336,585	\$ 574,014	\$ 406,926	\$ 693,360	\$ 456,033	\$ 776,798	\$ 505,626	\$ 861,082

In addition to increased contributions levels, AH’s CLC Schedule adds unique, specific building types that tend to cost more and puts AH at a disadvantage when using HUD’s HCC/TDC Limits. Finally, AH also includes add entries (bolded below) to the extraordinary site costs exclusions:

- Construction of extensive street and other public improvements
- **Davis-Beacon wage requirements** for labor costs related to buildings more than 4-stories
- Dealing with flood plain
- Dealing with unusual site conditions
- Extensive rock and/or soil removal and replacement

<sup>11</sup> Based on 2019 projections; source: [www.statista.com](http://www.statista.com) and [www.wikipedia.com](http://www.wikipedia.com).

<sup>12</sup> The Atlanta-Sandy Springs-Alpharetta, GA MSA is number 17; source: [www.statista.com](http://www.statista.com).

- **Fire safety design considerations**, such as FRT requirements, fire suppression equipment and associated costs, and other fire elements required for buildings over 4-stories
- **Green/Sustainability costs** over and above the regulation certification requirements
- Removal or replacement of extensive underground utility systems
- **Stabilization measures**, as required, for midrise and high rise buildings
- **Structured underground parking** for buildings sitting on less than 3 acres with dense zoning

AH expects to continue its engagement in multiple development and redevelopment projects on more than 400 AH-Owned parcels within Atlanta proper. Because of parcel size, zoning, and configuration, many of the planned projects require mid and high-rise vertical construction to maximize the use of space to increase the number of affordable units and account for higher Dwelling Construction and Equipment (DC&E) costs. Vertical construction requires infrastructure investment and specialty construction measures. Under AH's TDC Limits, AH **includes building types not listed** under HUD's TDC, **factor higher per unit costs (PUC)** that permit AH to contribute a higher dollar amount to planned projects, **and add elements to the list of extraordinary site costs** associated with the planned building types.

Common multi-story configurations include Tuck-under/walk-up, Wrap-around, and Podium. Each configuration has unique requirements in terms of its structural design and detailing. Under this activity, AH focuses on Wrap-around and Podium constructions or midrise and high-rise buildings, where 0 to 5 stories meets AH's midrise definition and 6 stories and above meets AH's high-rise definition. AH will adjust AH's CLC Schedule periodically to maintain a 10% or more difference that HUD's HCC/TDC Limits or as local market conditions dictate.

**ii. Describe how the proposed activity will achieve one or more of the three statutory objectives and the specific impacts on that statutory objective(s).**

Primarily this proposed activity achieves **MTW Statutory Objective: Increase Housing Choices** by permitting AH to contribute a higher amount of Federal dollars towards per unit costs. By being able to contribute a higher PUC, AH can construct or preserve more affordable housing, which offers more housing choices to low-income families.

Secondly, utilization of AH's TDC Limits may also achieve **MTW Statutory Objective: Cost Efficiency** through property appreciation over time since AH is able to contribute more PUC funds to development and redevelopment projects.

**iii. Provide the anticipated schedule for implementing the proposed activity.**

AH anticipates the following implementation schedule:

- Beginning January 1, 2022, AH will actively utilize AH's CLC Schedule or immediately after HCC/TDC COVID-19 Waivers expire, whichever comes later.

**B. Activity Metrics Information**

**i. HUD Standard Metrics applicable to the proposed activity**

The following HUD Standard Metrics are applicable to this activity:

- CE #1: Agency Cost Savings
- CE #4: Increase in Resources Leveraged
- HC #1: Additional Units of Housing Made Available

ii. **Baseline performance level for each metric prior to implementation of the proposed activity**

<b>CE #1: Agency Cost Savings - CLC Schedule</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Total cost of task in dollars (decrease).	Cost of task prior to implementation of the activity (in dollars).	Expected cost of task after implementation of the activity (in dollars).	Actual cost of task after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
Total cost of task in dollars.	<b>TBD</b>	<b>TBD</b>	<b>TBD</b>	Meets Benchmark
	<b>Total Development Cost</b>	<b>Total Development Cost</b>	<b>Total Development Cost</b>	

<b>CE #4: Increase in Resources Leveraged - CLC Schedule</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Amount of funds leveraged in dollars (increase).	Amount leveraged prior to implementation of the activity (in dollars). This number may be zero.	Expected amount leveraged after implementation of the activity (in dollars).	Actual amount leveraged after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
Amount of funds leveraged in dollars.	\$ -	<b>TBD</b>	<b>TBD</b>	Meets Benchmark
	<b>Dollars Leveraged</b>	<b>Dollars Leveraged</b>	<b>Dollars Leveraged</b>	

<b>HC #1: Additional Units of Housing Made Available - CLC Schedule</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of new housing units made available for households at or below 80% AMI as a result of the activity (increase). If units reach a specific type of household, give that type in this box.	Housing units of this type prior to implementation of the activity (number). This number may be zero.	Expected housing units of this type after implementation of the activity (number).	Actual housing units of this type after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
Number of new housing units made available for households at or below 80% AMI as a result of the activity.	<b>0</b>	<b>TBD</b>	<b>TBD</b>	Meets Benchmark
	<b>Housing Units Made Available</b>	<b>Housing Units Made Available</b>	<b>Housing Units Made Available</b>	

iii. Give annual benchmark for each metric

Annual Benchmarks - CLC Schedule						
Unit of Measurement	Baseline	FY2022	FY2023	FY2024	FY2025	FY2026
Total cost of task in dollars	TBD	TBD	TBD	TBD	TBD	TBD
Amount of funds leveraged in dollars.	\$ -	TBD	TBD	TBD	TBD	TBD
Number of new housing units made available for households at or below 80% AMI as a result of the activity.	0	TBD	TBD	TBD	TBD	TBD

iv. If applicable, give long-term benchmark for each metric

N/A

v. Give the data source from which the metric data will be compiled

AH will compile activity metric data from proprietary software, internally maintained databases, and similar data collecting sources.

C. Cost Implications

i. State whether the proposed activity will result in any cost implications (+/-) for the PHA.

AH **does not anticipate** the proposed activity resulting in **any cost implication** for AH.

ii. If the proposed activity does result in cost implications, provide an estimate of the amount and discuss how PHA will manage anticipated surplus or deficit.

N/A.

D. Need/Justification for MTW Flexibility

i. Cite the authorization detailed in Attachment C/D of the Standard MTW Agreement that gives the PHA the flexibility to conduct the proposed activity.

AH utilizes MTW Authorization under **Attachment D Section VIII.C.1: Simplification of the Development and Redevelopment Process** of its Amended and Restated MTW Agreement to develop and adopt reasonable cost formulas that will replace HUD's TDC Limits.

ii. Explain why the cited authorization is needed to engage in the proposed activity.

Atlanta's rapid, explosive real estate development market has increased labor costs and material costs. These cost increases over the last 5 years have made it **very difficult for AH to compete successfully without contributing a higher PUC** and removing extraordinary site costs in vertical construction projects. By exercising the **cited MTW Authorization**, AH is able **to modify HUD Regulation 24 CFR §941.306 Total Development Cost (TDC) Limit** to design TDC Limits more reflective of its planned development and redevelopment projects on AH-owned parcels throughout the city. These planned projects include midrise and high-rise buildings, which may require specialty construction measures, so AH needs a higher PUC formula to support planned projects.

Without the ability to contribute a higher PUC and remove extraordinary site costs from calculations, AH is not able to develop smaller parcels with a higher density, provide subterranean parking, assemble fire safety designs, and stabilize Podium configured buildings above 4-stories and thus AH will continue to pay higher loan costs associated with constructing taller buildings for higher density. If AH must pay more in construction costs, then AH will continue to face challenges of adding affordable housing units in a rapidly growing market that continues to price out low-income families.

**This is not a Rent Reform or Term Limit activity. Therefore, element E does not apply to this activity.**

**E. Rent Reform/Term Limit Information (if applicable)**

**i. Impact Analysis**

N/A

- (1) A description of how the proposed MTW activity will impact household rent/tenant share
- (2) A description of how the MTW PHA will implement and track the rent reform activity
- (3) Numerical analysis detailing the intended/possible impacts of the rent reform activity
- (4) A plan for how the MTW PHA will weigh the consequences/benefits of the rent reform activity to determine adjustments/terminations/reductions/expansions/continuations in the performance of the activity.

**ii. Hardship case criteria**

N/A

**iii. Descriptions of annual reevaluations**

N/A

**iv. Transition period**

N/A

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## SH.2021.03 – CHOICE NEIGHBORHOODS (CN) DOWN PAYMENT ASSISTANCE (DPA) PROGRAM

### A. Activity Description

#### i. Describe the Proposed Activity.

Through utilization of a \$30 million Choice Neighborhoods Implementation Grant, AH is engaged in transforming the former University Homes public housing site (renamed Scholars Landing) and revitalizing the University Choice Neighborhood (UCN) comprised of the Ashview Heights, Atlanta University Center, and Vine City neighborhoods (see image). Under HUD's transformation mantra of Housing, People, and Neighborhoods, AH administers its five phase plan for Scholars Landing. The first four phases of the plan include scores of rental units and Phase V of the plan includes a homeownership component that will include a combination of townhomes, flats, and/or condominiums.



Through this activity, AH plans award one-time assistance to eligible, first time homebuyers seeking to purchase a home constructed at Scholars Landing or within the identified UCN boundaries. The CN DPA award is not comprised of any CNIG funds and is open to eligible applicants that are at or below 115% of the Area Median Income (AMI) Limit<sup>13</sup>.

Therefore, under this activity, AH plans to award assistance to qualified, first time homebuyers that earn \$99,240 or less per year (adjusted for family household size).

At least 20% of the housing constructed at Scholars Landing or within the UCN boundaries is reserved for AH-assisted families and other eligible low-income to moderate-income families. To ensure affordability within the target area, AH anticipates awarding one-time assistance in the form of a deferred mortgage loan of up to \$60,000 per affordable unit.

#### ii. Describe how the proposed activity will achieve one or more of the three statutory objectives and the specific impacts on that statutory objective(s).

This proposed activity supports the **Increase Housing Choices for low-income families MTW Statutory Objective** by covering closing costs associated with typical home purchases. The CN DPA reduces the mortgage loan amount and makes the dream of homeownership an attainable reality for those eligible, qualified families positioned for first time homeownership.

Because AH plans to reserve at least 20% of the new home construction within the UCN boundaries for low-income families, the CN DPA Activity **Gives an Incentive to Families with Children where the Head of Household is working. . . MTW Statutory Objective**. The CN DPA assistance is available on properties owned/acquired by AH within the UCN targeted for single-family home development.

<sup>13</sup> As of April 1, 2020, the AMI for the Atlanta-Sandy Springs-Roswell MSA is \$82,700.

**iii. Provide the anticipated schedule for implementing the proposed activity.**

AH anticipates the following implementation schedule:

- July 1, 2021 through January 31, 2022, AH will finalize this activity’s structure in preparation for pre-sales beginning in spring 2022.
- March 1, 2022 and forward or unit pre-sales effective date, AH plans eligibility screenings for CN DPA award.

**B. Activity Metrics Information**

**i. HUD Standard Metrics applicable to the proposed activity**

The following HUD Standard Metrics are applicable to this activity:

- HC #6: Increase in Homeownership Opportunities
- HC #7: Households Assisted by Services that Increase Housing Choice

**ii. Baseline performance level for each metric prior to implementation of the proposed activity**

<i>HC #6: Increase in Homeownership Opportunities -</i>				
<i>CN DPA</i>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of households that purchased a home as a result of the activity (increase).	Number of households that purchased a home prior to implementation of the activity (number). This number may be zero.	Expected number of households that purchased a home after implementation of the activity (number).	Actual number of households that purchased a home after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
Number of households that purchased a home as a result of the activity.	0	0	TBD	Does Not Meet Benchmark
	<b>UCN HHS that Purchased a Home</b>	<b>UCN HHS that Purchased a Home</b>	<b>UCN HHS that Purchased a Home</b>	

**iii. Give annual benchmark for each metric**

<i>Annual Benchmarks - CN DPA</i>						
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>FY2022</b>	<b>FY2023</b>	<b>FY2024</b>	<b>FY2025</b>	<b>FY2026</b>
Number of households receiving services aimed to increase housing choice (increase).	0	0	6	5	6	3

**iv. If applicable, give long-term benchmark for each metric**

AH’s long-term benchmark is for the CN DPA to increase homeownership on at least 20% of the newly constructed homes within the boundaries for low-income families for a cumulative total of 20 families within 5-years or by project completion, whichever comes first.

**v. Give the data source from which the metric data will be compiled**

AH will compile activity metric data from proprietary software, internally maintained databases, and similar data collecting sources.

### C. Cost Implications

iii. **State whether the proposed activity will result in any cost implications (+/-) for the PHA.**  
AH **does anticipate** the proposed activity resulting in **a cost implication** for AH.

iv. **If the proposed activity does result in cost implications, provide an estimate of the amount and discuss how PHA will manage anticipated surplus or deficit.**

AH, estimates that the proposed activity's **cost implication** will total nearly \$1.2 million for AH:

- o AH projects 20 CN DPA Awards at \$60,000 each that totals \$1,200,000 by project's end.

### D. Need/Justification for MTW Flexibility

iii. **Cite the authorization detailed in Attachment C/D of the Standard MTW Agreement that gives the PHA the flexibility to conduct the proposed activity.**

AH utilizes MTW Authorization under **Attachment D Section V.A: Single-Fund Budget with Full Flexibility** of its Amended and Restated MTW Agreement to establish a down payment assistance program to specifically increase and promote homeownership opportunities for low to moderate-income families that choose to live within the identified UCN boundaries.

iv. **Explain why the cited authorization is needed to engage in the proposed activity.**

Atlanta continues to experience phenomenal growth in its population and explosive real estate development. These two factors and the COVID-19 pandemic have increased material and labor costs. Increased costs make it difficult for low to moderate-income families to compete in the homeownership arena without significant assistance to realize their dream at an affordable price point.

Therefore, AH needs the cited MTW Authorization **to modify HUD Regulation 24 CFR §982.643 Homeownership Downpayment Assistance Grants** to award down payment assistance to eligible, qualified families that earn 115% of the AMI or less in the defined UCN boundaries at a higher award level than the grant cap.

Without the ability to contribute a higher level of assistance to help reduce the extraordinary construction costs added to the home price, homeownership diversity in this rapidly gentrifying area excludes lower income families, which has a disparate impact on minorities returning to or living in an area of opportunity that includes jobs.

**This is not a Rent Reform or Term Limit activity. Therefore, element E does not apply to this activity.**

### E. Rent Reform/Term Limit Information (if applicable)

iii. **Impact Analysis**

N/A

- (1) A description of how the proposed MTW activity will impact household rent/tenant share
- (2) A description of how the MTW PHA will implement and track the rent reform activity
- (3) Numerical analysis detailing the intended/possible impacts of the rent reform activity
- (4) A plan for how the MTW PHA will weigh the consequences/benefits of the rent reform activity to determine adjustments/terminations/reductions/expansions/continuations in the performance of the activity.

iv. **Hardship case criteria**

N/A

iv. **Descriptions of annual reevaluations**

N/A

v. **Transition period**

N/A

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## IV. APPROVED MTW ACTIVITIES: HUD Approval Previously Granted

### A. IMPLEMENTED ACTIVITIES

AH's MTW Activities				
Activity ID		Activity Name	Page	MTW Authorization(s) AH's Attachment D
AW	2005.01	\$125 Minimum Rent	53	Section I.O: General Conditions; setting rents and term limits
AW	2005.02	Elderly Income Disregard	54	Sections I.O and VII.A.4: General Conditions and . . . Authorized to Create its own HCV Program
AW	2005.03	Work / Program Requirement	55	Section I.O: General Conditions Section IV: Self-Sufficiency/Supportive Services
HC	2005.04	Enhanced Inspection Standards	56	Section VII: Establishment of HCV Program
HD	2005.06	Good Neighbor Program II	57	Section IV: Self-Sufficiency/Supportive Services Section V: Single-Fund Budget with Full Flexibility
HD	2005.06	Human Development Services	57	Section IV: Self-Sufficiency/Supportive Services Section V: Single-Fund Budget with Full Flexibility
PH	2005.07	4 to 1 Elderly Admissions	58	Section III: Occupancy Policies Section IV: Self-Sufficiency/Supportive Services
RE	2005.09	Reformulating the Subsidy Arrangement in Mixed-Use Communities	58	Section V: Single-Fund Budget with Full Flexibility Section VII.C: Simplification of the Development and Redevelopment Process
SH	2005.09	Develop Alternate and Supportive Housing Resources	59	Section V: Single-Fund Budget with Full Flexibility Section VII.B: Simplification of the Process to Project-Base Section 8 Vouchers Section VII.C: Simplification of the Development and Redevelopment Process
RE	2005.10	Revitalization Program	60	Section V: Single-Fund Budget with Full Flexibility Section VII.B: Simplification of the Process to Project-Base Section 8 Vouchers Section VII.C: Simplification of the Development and Redevelopment Process

AH's MTW Activities				
Activity ID		Activity Name	Page	MTW Authorization(s) AH's Attachment D
RE	2005.11	Gap Financing	60	Second Amendment, Section 2: Use of MTW Funds Second Amendment, Section 3: Reinstatement of "Use of MTW Funds" Implementation Protocol
HC	2006.01	AH Submarket Payment Standards	61	Section VII: Establishment of HCV Program
RE	2006.02	HomeFlex Site-Based Administration	62	Section V: Single-Fund Budget with Full Flexibility Section VII.B: Simplification of the Process to Project-Base Section 8 Vouchers Section VII.C: Simplification of the Development and Redevelopment Process
HC	2007.01	Re-engineering the Housing Choice Voucher Program	62	Section V: Single-Fund Budget with Full Flexibility Section VII: Establishment of HCV Program Section VII.B: Simplification of the Process to Project-Base Section 8 Vouchers Section VII.C: Simplification of the Development and Redevelopment Process
HC	2007.02	Rent Reasonableness	63	Section VII: Establishment of HCV Program
RE	2007.03	Comprehensive Homeownership Program	64	Section V: Single-Fund Budget with Full Flexibility
RE	2007.04	HomeFlex as a Strategic Tool	65	Section V: Single-Fund Budget with Full Flexibility Section VII.B: Simplification of the Process to Project-Base Section 8 Vouchers Section VII.C: Simplification of the Development and Redevelopment Process
AW	2008.01	Rent Simplification / AH Standard Deductions	66	Section I.O: General Conditions
HC	2008.02	Leasing Incentive Fee	66	Section VII: Establishment of HCV Program
PH	2008.03	Energy Performance Contracting	67	Section IX: Energy Performance Contracting

AH's MTW Activities				
Activity ID		Activity Name	Page	MTW Authorization(s) AH's Attachment D
HC	2011.02	HCV Program Housing Assistance Payment Abatement Policy	68	Section VII: Establishment of HCV Program
PH	2011.03	Aging Well Program	68	Section IV: Self-Sufficiency/Supportive Services Section V: Single-Fund Budget with Full Flexibility
SH	2013.01	Veterans Supportive Housing	69	Section IV: Self-Sufficiency/Supportive Services Section V: Single-Fund Budget with Full Flexibility

### AW.2005.01 - \$125 MINIMUM RENT

#### i. Plan Year Approved, Implemented, Amended

Activity approved and implemented in FY 2005. Activity not amended since implementation.

#### ii. Description/Update

In response to budget constraints and identifying opportunities for program participants to contribute toward sustaining subsidized housing assistance and paying their "fair share", AH utilized MTW Authorizations Section I.O under Attachment D of its Amended and Restated MTW Agreement to increase the minimum rent to \$125 per month.

The rent increase was effective October 1, 2004 (FY 2005) and applicable to all rental assistance programs. Exempt households, defined as all members of the household that meet the definition of elderly or disabled and have a fixed, stable income source, such as Social Security, Social Security Disability Insurance (SSDI/SSI), employment pension, Veterans Affairs Benefits or similar fixed income sources. Households meeting the exclusionary definitions are exempt from the application of the minimum rent and continue to pay income-based rent or 30% of their adjusted gross income.

AH's housing policies extend to all properties under AH's portfolio, including sites that are managed by professional property management agents that includes public housing, Mixed (mixed-finance, mixed-income), and HomeFlex rental communities achieved through public-private partnerships. Management agents at those site are responsible for implementing AH housing policies. AH conducts periodic site visits and consultations with management representatives, as well as requests and reviews management reports for compliance while offering training classes with respect to property operations, compliance, and financial oversight.

#### iii. Planned Non-Significant Changes

This activity did not have any non-significant changes during the reporting period.

#### iv. Planned Changes to Metrics/Data Collection

This activity did not have any changes to Metrics/Data Collection during the reporting period.

#### v. Planned Significant Changes

This activity did not have any significant changes during the reporting period.

## **AW.2005.02 – ELDERLY INCOME DISREGARD**

### **i. Plan Year Approved, Implemented, Amended**

Activity approved and implemented in FY 2005. Activity not amended since implementation.

### **ii. Description/Update**

AH introduced this activity to encourage older person households to maintain engagement in their community, increase self-sufficiency levels of program participants on fixed, stable sources of income, and improve the quality of life of its program participants. Therefore, AH utilizes MTW Authorizations Section I.G and I.O: General Conditions under Attachment D of its Amended and Restated MTW Agreement to disregard earned income from employment earned by elderly persons or disabled persons.

Incentivizing older persons whose primary source of income meets the definition of fixed, stable income to return to the workforce accomplishes the priorities of this activity. Fixed, stable income includes income from a verifiable plan such as Social Security, Social Security Disability Insurance (SSDI/SSI), employment pension, Veterans Affairs (VA) Benefits and similar fixed, stable income sources.

In instances where the Annual Fixed Income is not the primary source of income, AH, at its discretion, may establish a limit on the amount of disregarded earned income; therefore, earned income from employment not treated as disregarded income is include in the annual household income calculation for the Total Tenant Payment amount. In addition, this activity complements AH's Aging Well strategy.

### **iii. Planned Non-Significant Changes**

Although this activity did not have any non-significant changes during the reporting period, this activity was re-proposed in AH's 2021 MTW Annual Plan to combine with a like activity and rename appropriately.

### **iv. Planned Changes to Metrics/Data Collection**

This activity did not have any changes to Metrics/Data Collection during the reporting period.

### **v. Planned Significant Changes**

This activity did not have any significant changes during the reporting period.

## **AW.2005.03 – WORK/PROGRAM REQUIREMENT**

### **i. Plan Year Approved, Implemented, Amended**

Activity approved and implemented in FY 2005. Activity not amended since implementation.

### **ii. Description/Update**

AH believes that the primary paths to self-sufficiency are work and education – a perspective supported by evidence-based studies. As such, and in line with our goal of positioning our families for success, AH designed a work/program requirement by utilizing MTW Authorizations Section I.H: General Conditions and Section IV: Self-Sufficiency/Supportive Services under Attachment D of its Amended and Restated MTW Agreement.

Under this activity, AH requires all program participants to contribute towards their housing by being actively engaged in education or employment activities. Therefore, work-abled Head of Household (HoH) program participants (18-61) and other adult household members are required to maintain continuous employment and minor household members must maintain fulltime enrollment in primary, secondary, or post-secondary school. Minors not meeting the school enrollment requirement must meet the full time employment requirement as a condition of the HoH to continue receiving rental assistance. Individuals who meet the workable definition by age, but are unable to meet the, education or employment requirement because of a disability, must be verifiable.

AH may grant rent relief for program participants for employment terminations beyond the participant's control; otherwise, participants have 60 days to comply with the requirement unless an exemption applies. AH refers non-compliant public housing and housing choice voucher households to community resources that link education, employment, training, and related services to help individuals become and remain compliant with AH's requirement.

In general terms, AH realizes that many program participants work in the Service Industry – food service, hospitality, personal care, retail, and similar typed jobs. These jobs usually base staffing on algorithms that factor in prior year data and season, and the employer uses this data to plan current year schedules. Realizing this employment practice AH aligned the required hours of employment to emulate scheduling practices of many employers by modifying its work requirement from 30 hours per week to an average of 20 hours per week. AH, will continue to monitor employment practice and compliant families and adjust the requirement over time as appropriate.

### **iii. Planned Non-Significant Changes**

Although this activity did not have any non-significant changes during the reporting period, this activity aligned the required hours of employment to emulate the scheduling practices of many employers.

### **iv. Planned Changes to Metrics/Data Collection**

This activity did not have any changes to Metrics/Data Collection during the reporting period.

### **v. Planned Significant Changes**

This activity did not have any significant changes during the reporting period.

## AW.2005.04 – ENHANCED INSPECTION STANDARDS

### **i. Plan Year Approved, Implemented, Amended**

Activity approved and implemented in FY 2005. Activity not amended since implementation.

### **ii. Description/Update**

In response to AH's competitive service jurisdiction, AH regularly reviews inspection processes and procedures to improve the delivery of affordable housing to all program participants. AH utilized MTW Authorizations Section VII: Establishment of Housing Choice Voucher Program under Attachment D of its Amended and Restated MTW Agreement to implement a more aggressive enforcement of higher standards to achieve higher health and safety standards for both housing partners and program participants to receive and maintain rental assistance.

A portion of AH's efforts focuses on considering updated materials and building codes and another portion focuses on aligning standards and timeline expectations that emulate industry best practices and, as appropriate, private rental market practices to reduce administrative burdens. These cited efforts enhance property eligibility criteria for single family, 2 to 4 unit multifamily, and commercial units (5 units or larger) while eliminating the requirement for property owners to provide gas certifications at the initial inspection.

Other enhancements include pre-contract assessments, initial inspections for property inclusion onto the rental assistance program, annual property and unit inspections, special inspections related to health and safety issues as initiated by program participants, property owners/housing partners, or community neighbors, as well as quality control inspections. AH revised the Site and Vicinity standards from a 5-door radius (front-back-left-right) to a 1-door radius (left-right-rear or immediately adjacent to the property). This standard clearly defines unit eligibility for both property owners/housing partners and program participants, as well as increases the housing stock.

Under this activity, AH modifies the frequency in which it requires subsidized units, Housing Choice and HomeFlex, to receive their annual Housing Quality Standards (HQS) Inspection. For Housing Choice, AH will place units that pass HQS inspection on the first attempt for two consecutive years on an every two-year HQS inspection schedule. This qualifying criterion limits AH prematurely allowing biennial inspections to units that demonstrate challenges as it relates to meeting HQS.

For HomeFlex, AH will place existing units identified as "high performers" that pass HQS inspection 3 consecutive years with a 90% (Building Exterior and Common Areas) and 80% (Units) pass rate on an every two-year HQS inspection schedule. AH will place new HomeFlex Program properties/units on an every two-year inspection cycle after meeting the following criteria:

- Year 1: Inspect 100% of units; Score 90% (building) and 80% (unit) pass rate.
- Year 2: Randomly inspect 25% of units; Score 90% and 80% pass rate.
- Year 3: Placed on AH's Biennial Inspection Schedule.

Properties/units identified as non-high performing or receive a failing score under either program will remain on or returned to an annual HQS inspection cycle.

### **iii. Planned Non-Significant Changes**

AH includes a biennial schedule for Housing Quality Standards (HQS) Inspections.

### **iv. Planned Changes to Metrics/Data Collection**

This activity did not have any changes to Metrics/Data Collection during the reporting period.

### **v. Planned Significant Changes**

This activity did not have any significant changes during the reporting period.

## HC.2005.05 – GOOD NEIGHBOR PROGRAM II

### **i. Plan Year Approved, Implemented, Amended**

Activity approved and implemented in FY 2005. Activity not amended since implementation.

### **ii. Description/Update**

Because of AH's plans to create mixed-income properties that would require the relocation of existing residents to other communities, AH felt the need to design this activity to help prepare low-income families to succeed in low-poverty neighborhoods. AH utilizes MTW Authorizations Sections IV: Self-Sufficiency/Supportive Services and V: Single-Fund Budget with Full Flexibility under Attachment D of its Amended and Restated MTW Agreement to establish a referral-based program to educate and prepare affected participants. Program curriculum includes living outside of public housing in market rent, mixed-income, and privately owned housing communities.

Since the program's inception, the Good Neighbor Program (GNP) has evolved its curriculum to include training on the roles and responsibilities of being a good neighbor once families relocate to an amenity-rich neighborhood. The program also highlights three "real life" issues: 1) Conflict Resolution and Problem Solving, 2) Community Expectations, and 3) Placing a High Value on Lifelong Education.

Neighbors, property owners/managers, housing partners, and other community interest groups/individuals can refer AH-assisted families to GNP for training on tenant-landlord relationships, self-reliance and personal responsibility, civic responsibilities and engagement, obligations and responsibilities of assisted families and similar topics in being a good neighbor. Further, GNP serves as a voluntary training program for youth and interested stakeholders. Referred families must complete this program for continued assistance and families that exceed the referral-threshold may lose their rental assistance.

### **iii. Planned Non-Significant Changes**

This activity did not have any non-significant changes during the reporting period.

### **iv. Planned Changes to Metrics/Data Collection**

This activity did not have any changes to Metrics/Data Collection during the reporting period.

### **v. Planned Significant Changes**

This activity did not have any significant changes during the reporting period.

## HD.2005.06 – HUMAN DEVELOPMENT SERVICES

### **i. Plan Year Approved, Implemented, Amended**

Activity approved and implemented in FY 2005. Activity not amended since implementation.

### **ii. Description/Update**

AH continually searches for community resources to assist program participants. Along this vein, AH utilizes MTW Authorizations Sections IV: Self-Sufficiency/Supportive Services and V: Single-Fund Budget with Full Flexibility under Attachment D of its Amended and Restated MTW Agreement to leverage agency resources and require full participation of all AH-assisted families referred to Human Development Services (HDS).

Required participation of referred families maximizes outcomes to link self-sufficiency and supportive services programming to its program participants and since inception of this activity, AH expanded its service provider network to more than 125 organizations that address a broad spectrum of training and social services for work-able, senior, and disabled families.

Two Family Self-Sufficiency (FSS) Program Coordinators are assigned to HDS to assess the specific needs of the whole family in support of working-aged adults (18-61) entering or returning to the workforce for the first time or after an extended period (6-months or longer) of unemployment.

### **iii. Planned Non-Significant Changes**

Although this activity did not have any non-significant changes during the reporting period, this activity may be a candidate for future closeout consideration because of its similarity with other MTW Activities.

### **iv. Planned Changes to Metrics/Data Collection**

This activity did not have any changes to Metrics/Data Collection during the reporting period.

### **v. Planned Significant Changes**

This activity did not have any significant changes during the reporting period.

## **PH.2005.07 – 4-TO-1 ELDERLY ADMISSION**

### **i. Plan Year Approved, Implemented, Amended**

Activity approved and implemented in FY 2005. Activity not amended since implementation.

### **ii. Description/Update**

The intent of this MTW Activity is to create an optimal mix of elderly (62+), near-elderly (55-61), and non-elderly, disabled families in AH-Owned communities. Therefore, AH utilizes MTW Authorizations Sections III: Occupancy Policies and IV: Self-Sufficiency/Supportive Services and V: Single-Fund Budget with Full Flexibility under Attachment D of its Amended and Restated MTW Agreement to create an admission preference for older applicants.

Under this MTW Activity, management agents are required to admit four elderly or near elderly applicants before the community admits one non-elderly, disabled applicant from their respective site-based waiting list to create a healthy diverse population that helps to improve the quality of life for all residents. Moreover, because of the mix it improves the complex social issues when mixing seniors with younger residents at AH-Owned communities. This preference also creates an assortment of services and resources that are accessible to all residents, regardless of age or ability, to engage in and improve the aging process.

### **iii. Planned Non-Significant Changes**

This activity did not have any non-significant changes during the reporting period.

### **iv. Planned Changes to Metrics/Data Collection**

This activity did not have any changes to Metrics/Data Collection during the reporting period.

### **v. Planned Significant Changes**

This activity did not have any significant changes during the reporting period.

## **RE.2005.09 – REFORMULATING SUBSIDY ARRANGEMENT IN AH-SPONSORED MIXED-USE COMMUNITIES, INCLUDING CENTENNIAL PLACE AND AH'S AFFORDABLE COMMUNITIES**

### **i. Plan Year Approved, Implemented, Amended**

Activity approved and implemented in FY 2005.

### **ii. Description/Update**

Under this activity, AH utilizes MTW Authorizations Sections V: Single-Fund Budget with Full Flexibility and Section VII.C: Demonstration Program on Project-Based Financing under Attachment D of its Amended and Restated MTW Agreement to convert the form of operating subsidy and streamline compliance and reporting requirements for non-public housing units.

The original intent of this activity included AH working closely with development partners and financial stakeholders to create a structure and funding mechanism that essentially focused on sustaining and preserving affordable housing units at mixed-income, mixed-finance communities. AH worked closely with HUD to design a program structure and process for implementation a demonstration model (HUD-approved November 2, 2012) to reposition 301 units at Centennial Place in FY 2015 to allow units to carry their aliquot share of the debt service, equity requirement,

and operating costs for the property for the long-term sustainability of the development. AH accomplished this through various supportive funding vehicles such as receiving additional funding or Tenant Protection Vouchers (TPVs) and converting Section 9 operating subsidy to long-term Section 8 Project-Based Voucher (PBV) assistance. In addition, the development partners received LIHTC funding in FY 2016 as another funding vehicle for future phases.

Since this activity's implementation, AH continues to administer this activity and explore reformulation strategies that improve the long-term financial sustainability and preserve the public and private investments in other AH-Owned and mixed-income rental communities.

**iii. Planned Non-Significant Changes**

Although this activity did not have any non-significant changes during the reporting period, AH may consider this activity for re-proposal because of its specificity or consider it for closeout because of AH's participation in the Rental Assistance Demonstration (RAD) Program.

**iv. Planned Changes to Metrics/Data Collection**

This activity did not have any changes to Metrics/Data Collection during the reporting period.

**v. Planned Significant Changes**

This activity did not have any significant changes during the reporting period.

**SH.2005.09 – DEVELOPING ALTERNATE AND SUPPORTIVE HOUSING**

**i. Plan Year Approved, Implemented, Amended**

Activity approved and implemented in FY 2005.

**ii. Description/Update**

Originally, this activity supported AH allocating vouchers to provide assistance for supportive housing communities and worked to support new supportive housing developments for senior and disabled population groups. AH utilizes MTW Authorizations Sections V.A.2.f, Section VII.A, and Section VII.B.1-3 under Attachment D of its Amended and Restated MTW Agreement to earmark resources for alternative housing initiatives.

The intent of this activity continues to focus on targeting and assisting chronically homeless families, especially those with mental disabilities inappropriately housed in AH-Owned communities because of the non-supportive services on site to meet those residents' unique needs.

Although the last change in this activity merged Developing Alternative Housing Resources and Developing Supportive Housing into this current activity, the original concept and focus remains intact, which is homeless assistance programs and supportive services, non-targeted or mainstream programs. AH houses HomeAgain, its short-term housing assistance efforts under this activity. AH designed HomeAgain to help families avoid homelessness or combat chronic or extended periods of homelessness by essentially providing a short-term cash stipend.

**iii. Planned Non-Significant Changes**

This activity did not have any non-significant changes during the reporting period.

**iv. Planned Changes to Metrics/Data Collection**

This activity did not have any changes to Metrics/Data Collection during the reporting period.

**v. Planned Significant Changes**

This activity did not have any significant changes during the reporting period.

## RE.2005.10 – REVITALIZATION PROGRAM

### **i. Plan Year Approved, Implemented, Amended**

Activity approved and implemented in FY 2005. Activity not amended since implementation.

### **ii. Description/Update**

AH introduced this activity to reposition its public housing properties into economically sustainable sites and to revitalize amenity poor communities through investment to help make such communities amenity-rich and first choice areas in which to live, work, and play. Therefore, AH utilizes MTW Authorizations Sections II.A.3 . . . becoming a catalyst for community revitalization, V.A.2.b . . . commercial facilities consistent with the objectives, and Attachment G – Good Cause Justification . . . and other previously identified MTW Authorizations under Attachment D of its Amended and Restated MTW Agreement to explore and enter into agreements aligned with its neighborhood revitalization or affordable housing strategies.

Since this activity's implementation, AH's primary focus has been on repositioning its public housing portfolio and adding affordable units to the housing stock. Because of this intense focus, AH did not feature the revitalization component. However, innovative revitalization ideas and plans continued to generate for future consideration in commercial business ventures that support revitalization initiatives to stabilize local neighborhoods starving for reintegration into the surrounding community. Proposed ideas and plans include offering affordable housing units, retail and commercial ventures, great recreational facilities, and high performing schools to incorporate into AH's Revitalization Program, which may include AH-ownership of retail and commercial facilities to initiate revitalization.

### **iii. Planned Non-Significant Changes**

Although this activity did not have any non-significant changes during the reporting period, AH re-proposed this activity clearly stating the activity's intent, especially engaging in commercial business ventures on AH-Owned parcels in amenity-poor communities.

### **iv. Planned Changes to Metrics/Data Collection**

This activity did not have any changes to Metrics/Data Collection during the reporting period.

### **v. Planned Significant Changes**

This activity did not have any significant changes during the reporting period.

## RE.2005.11 – GAP FINANCING

### **i. Plan Year Approved, Implemented, Amended**

Activity approved and implemented in FY 2005. Activity not amended since implementation.

### **ii. Description/Update**

AH introduced this activity to facilitate financial closings in development projects associated with repositioning its public housing properties, which AH presumed to include funding other financial funding vehicles. As a result, AH utilizes MTW Authorizations Sections V.A.2 and V.A.2.b for all MTW eligible activities and all other previously identified MTW Authorizations under Attachment D of its Amended and Restated MTW Agreement to explore and apply gap financing strategies consistent with AH's Real Estate Development Strategy or AH's vision, mission or current business model.

Real estate projects are about timing and location and without the ability to fund or co-invest with partners, AH misses location and other opportunities or subjected to delayed and extended timelines, which contribute to increased costs. These actions are contradictory to spending Federal dollars effectively and efficiently and does not permit AH to increase housing choices for low-income families.

Since this activity's implementation, AH's primary focus has been on repositioning its public housing portfolio and adding affordable units to the housing stock. Because of this intense focus,

AH did not feature many the various financing components beyond facilitating financial closings. However, AH intended to issue construction loans, not to exceed 5-years to development partners as both a revenue stream to AH and to expedite the development of new affordable housing opportunities. As AH continues to acquire and revitalize communities in accordance with its vision, mission, and current business model, such activities require access to short-term funding for the innovative revitalization ideas and plans to transform amenity-poor communities into amenity-rich communities and first choice areas, where families can live, work, and play.

**iii. Planned Non-Significant Changes**

Although this activity did not have any non-significant changes during the reporting period, AH re-proposed this activity clearly stating the activity's intent, especially engaging in financial activities involving AH-Owned parcels.

**iv. Planned Changes to Metrics/Data Collection**

This activity did not have any changes to Metrics/Data Collection during the reporting period.

**v. Planned Significant Changes**

This activity did not have any significant changes during the reporting period.

**HC.2006.01 – ATLANTA HOUSING SUBMARKET PAYMENT STANDARDS**

**i. Plan Year Approved, Implemented, Amended**

Activity approved and implemented in FY 2006. Activity amended in FY 2016.

**ii. Description/Update**

AH utilizes MTW Authorizations Sections VII.A.14 and 19 and VII.B.4.6 under Attachment D of its Amended and Restated MTW Agreement to adjust and determine Fair Market Rents (FMRs) or structure such for Housing Choice Voucher assistance or initiatives.

Originally, AH identified seven submarkets within its service jurisdiction after consulting with an independent entity to develop its own Payment Standards. Beginning in 2007, AH implemented separate payment standard schedules for each identified submarket upon the establishment of new Housing Assistance Payment (HAP) contracts during the recertification period.

In FY 2016, AH updated its submarket payment standards based on market studies that expanded the schedules to 23 submarkets. These new payment standards and submarket additions reflect dramatic changes in Atlanta's real estate market since 2007. By aligning its payment standards with actual single-family residential rental costs at the census tract level, AH does not skew market rents for a neighborhood by the subsidy paid. In addition, the realignment of the rents allows AH better management of its subsidy allocation, which permits AH to provide more housing opportunities in low-poverty and less impacted areas.

**iii. Planned Non-Significant Changes**

Although this activity did not have any non-significant changes during the reporting period, AH plans to update the submarket payment standards during FY 2021 and consider this activity for closeout in accordance Notice PIH 2018-01 (HA) during FY 2021.

**iv. Planned Changes to Metrics/Data Collection**

This activity did not have any changes to Metrics/Data Collection during the reporting period.

**v. Planned Significant Changes**

This activity did not have any significant changes during the reporting period.

## RE.2006.02 – HOMEFLEX SITE-BASED ON-SITE ADMINISTRATION

### **i. Plan Year Approved, Implemented, Amended**

Activity approved in FY 2006 and implemented in FY 2007. Activity not amended since implementation.

### **ii. Description/Update**

Originally, AH introduced this activity to eliminate duplicated administrative processes, eligibility determinations, and resident screening at AH's Project-Based Rental Assistance (rebranded as HomeFlex) communities. By utilizing MTW Authorizations Sections V: Single-Fund Budget with Full Flexibility, VII.A: AH is Authorized to Create its own Housing Choice Voucher Program, VII.B: Simplification of the Process to Project-Base Section 8 Vouchers and VII.C: Demonstration Program on Project-Based Financing under Attachment D of its Amended and Restated MTW Agreement to streamline project-basing activities.

In addition, AH initially used this activity to launch a homeless demonstration program and a supportive housing program for persons with developmental disabilities and chronic mental illness at seven privately owned communities. By agreement, AH entered into seven two-year renewable HomeFlex contracts with property owners, where a third-party supportive service provider was engaged by the owner to provide ongoing supportive services for target participants for a minimum of two-years. Since then, agreement terms with private property owners have increased from two to 20 years. The owner entities and their professional management agent have full responsibility for performing all site-based administration tasks for the property, which is subject to AH inspections and reviews, for administrative and programmatic functions carried out in connection with admissions and occupancy procedures relating to HomeFlex assisted units.

The changes and updates make the HomeFlex Program more attractive to prospective housing partners and it increases the affordable housing stock and increases housing choices for the targeted population.

### **iii. Planned Non-Significant Changes**

Although this activity did not have any non-significant changes during the reporting period, AH may consider this activity for re-proposal because of its specificity or consider it for closeout because of its similarity with other MTW Activities.

### **iv. Planned Changes to Metrics/Data Collection**

This activity did not have any changes to Metrics/Data Collection during the reporting period.

### **v. Planned Significant Changes**

This activity did not have any significant changes during the reporting period.

## HC.2007.01 – RE-ENGINEERING THE HOUSING CHOICE VOUCHER PROGRAM

### **i. Plan Year Approved, Implemented, Amended**

Activity approved and implemented in FY 2007. Activity not amended since implementation.

### **ii. Description/Update**

AH introduced this activity to take advantage of cost efficiencies that effectively streamline AH's Housing Choice Voucher (HCV) Program processes. Therefore, AH utilizes MTW Authorization Section VII.A: . . . Authorized to Create its own Housing Choice Voucher (HCV) Program under Attachment D of its Amended and Restated MTW Agreement to develop new policies and procedures in the administration of its HCV Program.

Originally, AH sought to move closer to a paperless, state-of-the-art, client-focused, self-servicing program, where the key areas focused on and continue to include Organizational Structure, Systems and Processes, Training and Capacity Building, Customer Service Delivery, and State-of-the-Art Technology. Since implementation of this activity, AH replaced paper files with electronic files and e-copied all permanent documents, created an online portal for property

owners, and created a call center to improve customer service response times. Other re-engineering innovation implemented under this activity include measures designed to enhance and streamline core-business processes and related policies, procedures, and business documents.

AH reviews its core business processes and operating policies annually in an effort to keep them aligned with industry best practices and, as appropriate, to emulate them to private sector business practices. Through these reviews and alignments, AH is able to eliminate or reduce administrative steps that delay or elongate lease-ups, which burdens the process times while outlining family obligations for program participants. In FY 2016, AH created a Landlord Advisory Group to examine processes and procedures with the goal of ensuring that privately owned housing options remain available and affordable to AH's primary client base – low-income families.

**iii. Planned Non-Significant Changes**

This activity did not have any non-significant changes during the reporting period.

**iv. Planned Changes to Metrics/Data Collection**

This activity did not have any changes to Metrics/Data Collection during the reporting period.

**v. Planned Significant Changes**

This activity did not have any significant changes during the reporting period.

**HC.2007.02 – RENT REASONABLENESS**

**i. Plan Year Approved, Implemented, Amended**

Activity approved and implemented in FY 2007. Activity not amended since implementation.

**ii. Description/Update**

Previously, AH employed a third-party independent market analysis to establish the market equivalent rent for each residential unit in AH's HCV Program, which is costly. Through utilization of MTW Authorization Section VII: Establishment of Housing Choice Voucher (HCV) Program under Attachment D of its Amended and Restated MTW Agreement AH is able to develop its own rent reasonableness determination for properties owned directly and indirectly by AH.

Overall, this activity provides an improved and consistent rent determination outcome that stabilizes Housing Choice contract rents in line with the rental market and available subsidy resources. Rent determinations reflect the changing market rent dynamics and realities of the residential real estate market. Therefore, the ability to provide timely rent determinations can provide HAP savings for AH.

In FY 2016, AH updated its submarket payment standards. These rents are subject to rent reasonableness determinations; however, AH does expect the cumulative effects of the payment standards to increase certain HAP associated costs but does not expect the rents to rise to the full level of AH's higher alternative payment standards. Nonetheless, AH may continue utilization of third-party independent market analysis because of insight regarding rents in the Atlanta market and real estate expertise, as well as AH's overall workload.

**iii. Planned Non-Significant Changes**

This activity did not have any non-significant changes during the reporting period.

**iv. Planned Changes to Metrics/Data Collection**

This activity did not have any changes to Metrics/Data Collection during the reporting period.

**v. Planned Significant Changes**

This activity did not have any significant changes during the reporting period.

## RE.2007.03 – COMPREHENSIVE HOMEOWNERSHIP PROGRAM

### **i. Plan Year Approved, Implemented, Amended**

Activity approved and implemented in FY 2007. Activity not amended since implementation.

### **ii. Description/Update**

AH introduced this activity through utilization of MTW Authorization Section V.A: Single-Fund Budget with Full Flexibility under Attachment D of its Amended and Restated MTW Agreement to establish a Down Payment Assistance (DPA) Program to increase homeownership opportunities for low to moderate-income families and promote homeownership opportunities in healthy, mixed-income communities through the following approach:

- Provision of a subordinated mortgage loan to qualified households that earn up to 80 percent (may increase up to 115 percent based on funding source(s)) of the area median income (AMI), are first-time homebuyers and purchase within the city of Atlanta. The subordinated mortgage loans is a one-time assistance product for a 10-year period, and forgivable at 20% annually (in years 6 through 10).

Originally, AH sponsored a conventional Housing Choice Voucher (HCV) Homeownership Program (circa 2002 – 2009) that provided mortgage payment assistance to qualified, AH-assisted program participants purchasing a home under the terms of the HCV Homeownership Program. Primarily because AH was unable to get solid lender participation in this program, AH suspended its HCV Homeownership Program (circa 2009). During the active period of AH's HCV Homeownership Program, AH assisted 88 voucher participants in becoming homeowners and continues to support the last families (17) matriculating through the HCV Homeownership Program under the original terms.

As developed, AH's DPA homeownership program assists more low-income families beyond program participants. The program works with HUD-approved Home Buyer Education Counseling Providers to prepare low to moderate-income families in becoming successful and sustainable homeowners, maximizes the number of families AH can help by limiting the assistance to a one-time dollar amount that can be used with other down payment assistance programs. The latter feature really helps families defray the initial and overall costs of homeownership.

Under this activity, single-family unit inventory is reduced which requires more single-family units in the market whether by new construction or rehabilitation and modernization of existing stock. AH continues to refer all prospective homebuyers to its Down Payment Assistance Program developed under this MTW Activity.

### **iii. Planned Non-Significant Changes**

This activity did not have any non-significant changes during the reporting period.

### **iv. Planned Changes to Metrics/Data Collection**

This activity did not have any changes to Metrics/Data Collection during the reporting period.

### **v. Planned Significant Changes**

This activity did not have any significant changes during the reporting period.

## RE.2007.04 – HOMEFLEX AS A STRATEGIC TOOL

### **i. Plan Year Approved, Implemented, Amended**

Activity approved and implemented in FY 2007. Activity not amended since implementation.

### **ii. Description/Update**

Several years ago, AH innovatively reserved a portion of its Housing Choice Voucher funds for units located at market rent properties to increase the number of affordable units available, as well as to increase the housing choices for low-income families. AH's program Project-Based Rental Assistance (PBRA) was an original concept and rebranded as HomeFlex in the last 5 years.

Nonetheless, AH utilizes MTW Authorizations Section V.A: Single-Fund Budget with Full Flexibility, Section VII.B: Simplification of the Process to Project-Base Section 8 assistance, Section VII.C: Demonstration Program on Project-Based Financing under Attachment D of its Amended and Restated MTW Agreement to design its HomeFlex Program through competitive and non-competitive processes.

Project-basing assistance at AH-Owned or privately owned properties continues to be an innovative idea that pays substantial dividends to AH, the property owner, and eligible families. Under the premise, AH provides a subsidy for the rental unit on behalf of the eligible family and property owners and accepts the subsidy payment for the unit pursuant to the HomeFlex Agreement. Further, the assistance remains with the project or unit for the next eligible family to use.

Through this activity, the project-basing theme remains intact and AH can project base rental assistance at communities owned directly or indirectly by AH with or without competition. Therefore, AH may project base up to 100% assistance at communities owned by AH, which exceeds HUD project caps of 25% and 50% in the case of RAD and program cap limits, percent increase, project cap limits, and similar limitations outlined under the Housing Opportunities through Modernization Act (HOTMA).

In addition, this activity permits AH to solicit private developers and owners interested in reserving a percentage of their multifamily rental units for eligible low-income families and accepting project-based assistance (subsidy) monthly in return and also permits AH to receive and approve solicited and unsolicited proposals from developers and owners of multifamily rental properties outside of AH's service jurisdiction. Such examples may include negotiating intergovernmental agreements with PHAs, local government entities, or non-profit/for-profit organizations interested in reserving a percentage of their multifamily rental units in the Atlanta Metropolitan Statistical Area for eligible, low-income families.

### **iii. Planned Non-Significant Changes**

This activity did not have any non-significant changes during the reporting period.

### **iv. Planned Changes to Metrics/Data Collection**

This activity did not have any changes to Metrics/Data Collection during the reporting period.

### **v. Planned Significant Changes**

This activity did not have any significant changes during the reporting period.

## AW.2008.01 – RENT SIMPLIFICATION / AH STANDARD DEDUCTIONS

### i. Plan Year Approved, Implemented, Amended

Activity approved and implemented in FY 2008. Activity not amended since implementation.

### ii. Description/Update

AH streamlines the rental calculation operations and increases calculation accuracy by utilizing MTW Authorizations Section I.G and I.H: General Conditions under Attachment D of its Amended and Restated MTW Agreement to simplify the rent calculation and standardized deductions for all rental assistance programs.

Originally, AH employed HUD standard deductions for dependent households and elderly and disabled households. Through this activity, AH changes the deduction amount used to adjust household income in the rent calculation formula. The table below illustrates deduction changes at both HUD and AH levels:

Deduction Category	HUD Standard Deduction	AH Standard Deduction
Dependents	\$480	\$750
Elderly and/or Disabled	\$400	\$1,000

AH submits that its standard deduction amounts add value to the integrity, because they provide an equitable approach for all assisted families and reduces the ‘interrogation-like’ verification of unreimbursed out-of-pocket expenses. The standard deduction amounts also improve productivity because it eliminates the burden of “chasing” receipts and potentially performing multiple calculations once eligible households produce out-of-pocket expenses. Finally, the standard deductions improve the accuracy of the rental calculation process.

### iii. Planned Non-Significant Changes

This activity did not have any non-significant changes during the reporting period.

### iv. Planned Changes to Metrics/Data Collection

This activity did not have any changes to Metrics/Data Collection during the reporting period.

### v. Planned Significant Changes

This activity did not have any significant changes during the reporting period.

## AW.2008.02 – LEASING INCENTIVE FEES

### i. Plan Year Approved, Implemented, Amended

Activity approved and implemented in FY 2008. Activity not amended since implementation.

### ii. Description/Update

Living within AH’s service jurisdiction is an expensive proposition, even for those households with incomes 20 percent above the Area Median Income (AMI) of \$79,700 annually for much of this reporting period (July 1, 2019 – June 30, 2020). With this knowledge and understanding that AH was planning long-term revitalization of its housing stock, AH sought to recruit property owners through incentives to lease their units to families affected by relocation efforts because of HUD-approved demolition of AH-Owned communities (Please see page TBD of Appendix E for planned dispositions and demolitions.

Since implementation, this activity has evolved to create a faster program move process. AH utilizes MTW Authorizations Section VII.A: . . . Authorized to Create its Own HCV Program under Attachment D of its Amended and Restated MTW Agreement to provide leasing incentive fees (LIFs). In FY 2016, AH provided incentives for both prospective program participants and property owners to work together to find units and submit the Request for Tenancy (RTA) within 30 days of voucher issuance.

The LIFs serve to remove or reduce obstacles and barriers preventing low-income families from leasing quality housing in areas of opportunity. Overall, LIFs defray the cost of application fees, security deposits, and similar out-of-pocket expenses not readily accessible to voucher-holding families, especially first-time renters. Further, LIFs help to attract property owners with units in areas of opportunity, which increases both the affordable housing stock and number of housing partners accepting vouchers. Finally, AH offers LIFs to property owners with single-family homes to help increase the housing choices for voucher-holding families. Single-family property owners receive a New Contract Incentive or one-time unit incentive payment each time the single-family unit passes HQS Inspections on the initial visit and then subsequently leases that unit to a voucher-holding family under a new HAP Contract.

**iii. Planned Non-Significant Changes**

This activity did not have any non-significant changes during the reporting period.

**iv. Planned Changes to Metrics/Data Collection**

This activity did not have any changes to Metrics/Data Collection during the reporting period.

**v. Planned Significant Changes**

This activity did not have any significant changes during the reporting period.

**PH.2008.03 – ENERGY PERFORMANCE CONTRACTING**

**i. Plan Year Approved, Implemented, Amended**

Activity approved and implemented in FY 2008. Activity not amended since implementation.

**ii. Description/Update**

Under this activity, AH has leveraged a \$9.1 million Energy Performance Contracting (EPC) loan with MTW funds to modernize its communities by replacing older equipment, fixtures, and systems with newer, energy-efficient, earth craft equipment, fixtures, and systems to enhance the quality of living environments for public housing residents.

AH utilizes MTW Authorization Section IX: Energy Performance Contracting (EPC) under Attachment D of its Amended and Restated MTW Agreement to employ energy conservation and efficiency standards, practices, and improvements to its properties. Through this activity, AH works closely with Johnson Controls in administering its second EPC (FY 2011) to facilitate upgrades at its residential communities and pursue green initiatives with and without MTW funds. Some examples include new heating ventilation and air conditioning (HVAC) systems, upgraded bathrooms with low-flow faucets, showers, and toilets, and modern light fixtures with compact florescent, LED, or other upgraded lighting sources.

These capital improvements complement and supplement the American Recovery and Reinvestment Act (ARRA) renovations begun in FY 2010 and AH will continue to implement energy conservation measures as necessary when recapitalizing AH-Owned properties converted to project-based voucher units under the Rental Assistance Demonstration (RAD) Program. Since implementation, the cost savings have been higher than projected and through utilization of this activity, AH retains up to 50 percent of the costs savings under the EPC, which exceeds the 25 percent threshold allowed for non-MTW PHAs.

**iii. Planned Non-Significant Changes**

This activity did not have any non-significant changes during the reporting period.

**iv. Planned Changes to Metrics/Data Collection**

This activity did not have any changes to Metrics/Data Collection during the reporting period.

**v. Planned Significant Changes**

This activity did not have any significant changes during the reporting period.

## HC.2011.02 – HOUSING CHOICE VOUCHER PROGRAM HOUSING ASSISTANCE PAYMENT ABATEMENT POLICY

### **i. Plan Year Approved, Implemented, Amended**

Activity approved and implemented in FY 2011. Activity not amended since implementation.

### **ii. Description/Update**

Under this activity, withholds Housing Assistance Payments (HAPs) from housing partners whose rental unit(s) fails to comply with AH's established standards. Since AH's primary goal is to house and help house low-income families in clean, safe, sanitary, high quality housing units. AH utilizes MTW Authorizations Sections VII.A and B: . . . Authorized to Create its own Housing Choice Voucher (HCV) under Attachment D of its Amended and Restated MTW Agreement to develop and implement procedures and practices governing the abatement of housing assistance payments

In general, AH's subsidy assistance makes housing affordable for many families and with this subsidy, AH is obligated to ensure that housing meets or exceeds the set expectations set forth in AH's HCV Program operating procedures. To realize this goal, AH also elevates the expectations and standards with staff and housing partners, which results in a higher caliber of units and property owners participating in the program.

### **iii. Planned Non-Significant Changes**

This activity did not have any non-significant changes during the reporting period.

### **iv. Planned Changes to Metrics/Data Collection**

This activity did not have any changes to Metrics/Data Collection during the reporting period.

### **v. Planned Significant Changes**

This activity did not have any significant changes during the reporting period.

## PH.2011.03 – AGING WELL PROGRAM

### **i. Plan Year Approved, Implemented, Amended**

Activity approved and implemented in FY 2011. Activity not amended since implementation.

### **ii. Description/Update**

AH desires to enhance the delivery of case management and supportive services to older persons and persons with disability. Therefore, AH utilizes MTW Authorizations Sections IV: Self-Sufficiency/Supportive Services and V.A: Single-Fund Budget with Full Flexibility under Attachment D of its Amended and Restated MTW Agreement to design a place-based, supportive services program in support of AH's efforts.

These efforts include collaborations with various agencies and organizations throughout AH's service jurisdiction to implement the Naturally Occurring Retirement Community (NORC) model at AH-Owned communities. NORC is a national program model focused on enabling adults to age-in-place while building capacity throughout the community to support the process by placing a strong emphasis on resident involvement with priorities set by residents.

### **iii. Planned Non-Significant Changes**

Although this activity did not have any non-significant changes during the reporting period, AH plans to consider this activity for closeout because AH is converting its public housing units to long-term Section 8 project-based voucher assistance under the Rental Assistance Demonstration (RAD) Program.

### **iv. Planned Changes to Metrics/Data Collection**

This activity did not have any changes to Metrics/Data Collection during the reporting period.

### **v. Planned Significant Changes**

This activity did not have any significant changes during the reporting period.

## SH.2013.01 – VETERANS SUPPORTIVE HOUSING

### **i. Plan Year Approved, Implemented, Amended**

Activity approved and implemented in FY 2013. Activity not amended since implementation.

### **ii. Description/Update**

AH is committed to assisting veterans that reside within its service jurisdiction and Veterans Affairs Supportive Housing (VASH) vouchers administered by AH fall under project-based voucher rules and regulations, which is AH's HomeFlex Program. AH utilizes MTW Authorizations Sections VII.A: . . . Authorized to Create its Own Housing Choice Voucher Program and VII.B: Simplification of the Process to Project-Base Section 8 Vouchers under Attachment D of its Amended and Restated MTW Agreement to provide a selection preference for veterans of the United States Armed Forces and provide supportive housing for veterans.

Along the same veteran stabilization vein, in addition to VASH vouchers AH may also issue tenant-based vouchers to veterans to assist in their housing stabilization. Under AH's HomeFlex for Supportive Housing Program, owners and developers of supportive housing receive housing subsidy under a HomeFlex Agreement with AH for two years (agreement may be renewed or extended). In return, owners or developers are required to 1) work with a certified coordinator and 2) enter into an agreement with one or more service providers who will provide appropriate intensive support services for the target population. In addition, owners or developers agree to coordinate with any public agencies or non-profit organizations that can provide additional case management support to individual residents.

Finally, in an effort to maximize housing opportunities for veterans and alleviate the burden of the housing search, AH may provide project-based assistance throughout the city with VASH vouchers as appropriate housing opportunities and conditions arise or are created.

### **iii. Planned Non-Significant Changes**

This activity did not have any non-significant changes during the reporting period.

### **iv. Planned Changes to Metrics/Data Collection**

This activity did not have any changes to Metrics/Data Collection during the reporting period.

### **v. Planned Significant Changes**

This activity did not have any significant changes during the reporting period.

## B. NOT YET IMPLEMENTED ACTIVITIES

**i. Brief Description of the Approved MTW Activity, Proposed in an Annual MTW Plan, Approved by HUD, and Not Yet Implemented**

N/A

**ii. Provide an Update on the Implementation Plan for the MTW Activity**

N/A

**iii. Provide an Explanation of any Non-Significant Changes or Modifications to the MTW Activity**

N/A

## C. ACTIVITIES ON HOLD

**i. Describe the Approved MTW Activity that was Approved, Implemented, and MTW PHA Stopped Implementing (but has plans to reactivate in the future)**

N/A

**ii. Provide an Update on the Plan for Reactivating the MTW Activity**

N/A

**iii. Provide an Explanation of any Non-Significant Changes or Modifications to the MTW Activity since it was Approved by HUD**

N/A

## D. CLOSED OUT ACTIVITIES

**i. List the Closed out MTW Activities. Specify Plan Year(s) in which the MTW Activity was Approved, Implemented (as applicable), and Closed out**  
Please see table below.

**ii. Explanation of why the MTW Activity was Closed out**

Please see table that begins on the next page.

MTW Activity		Fiscal Year			Close Out Reason
Number	Name	Approved	Implemented	Closeout	
	American Recovery and Reinvestment Act ( <b>ARRA</b> ) of 2009	N/A	2009 <sup>14</sup>	2012	AH did not need an MTW waiver to conduct this activity
	Voluntary Compliance Agreement ( <b>VCA</b> )	N/A	2009 <sup>15</sup>	2011	AH did not need an MTW waiver to conduct this activity
PH. 2003.01	Affordable Fixed Rent / Affordable Flat Rent	2003	N/A	2017	AH combined this activity with PH.2017.01 – Elimination of Flat Rent
SH. 2005.08	Independent Living Demonstration	2005	2005	2020	AH has not been able to move forward with this activity because of various local and state requirements. In addition, it is unclear if an MTW waiver(s) is required
HD. 2005.14	Individual Development Accounts ( <b>IDAs</b> )	2005	N/A	2019	AH elected not to implement this MTW Activity
HC. 2006.03	Housing Choice Inspection Fees	2006	N/A	2019	AH determined that this activity requires more research. AH may propose this activity at a later date
HD. 2006.04	Standards for Residency in Single-Family Homes	2006	N/A	2008	AH did not need an MTW waiver to conduct this activity
HC. 2006.05	Port Administration Re-engineering	2006	N/A	2019	Activity was not supported under MTW Authorizations
HD. 2007.05	Housing Choice Family Self-Sufficiency ( <b>FSS</b> ) Program Re-engineering	2007	N/A	2008	AH combined this activity with RE.2007.03 – Comprehensive Homeownership Program
RE. 2007.06	Quality of Life Initiative ( <b>QLI</b> )	2007	2007	2010	AH did not need an MTW waiver to conduct this activity
PH. 2007.07	Utility Allowance Waiver	2007	2007	2010	AH elected to close out this activity based on AH analysis (admin costs outweighed revenue)
SH. 2008.04	John O. Chiles Annex Supportive Housing Pilot	2008	2008	2014	AH did not need an MTW waiver to conduct this activity
HD. 2008.05	Pre-Relocation Client Education (part of QLI)	2008	2008	2010	AH did not need an MTW waiver to conduct this activity
AW. 2010.01	Business Transformation Initiative (ERP solution)	2010	2010	2016	AH did not need an MTW waiver to conduct this activity
AW. 2011.01	Non-Elderly Disabled Income Disregard	2011	2011	2020	AH combines this activity with AW.2005.02 – Elderly Income Disregard and may be able to close both activities in accordance with Notice PIH 2016-05 (HA) – Streamlining Admin. Regs for Programs Administered by PHAs

<sup>14</sup> AH's estimated implementation year of Federal grant award.

<sup>15</sup> AH made enhancements and improvements to facilities, programs, policies, and procedures in response to accessibility requirements

MTW Activity		Fiscal Year			Close Out Reason
Number	Name	Approved	Implemented	Closeout	
RE 2012.01	Single Family Home Rental Demonstration	2012	2012	2021	AH met its obligation to deliver 26 homes under this format. AH will manage a long-term ground lease until the purchased homes are sold.
HC. 2012.02	Comprehensive Graduation Program	2012	N/A	2019	AH determined that this activity requires more research. AH may propose this activity at a later date
HD. 2013.02	Endowment Fund for Human Development Services	2013	N/A	2019	AH determined that this activity requires more research. AH may propose this activity at a later date
PH 2017.01	Elimination of Flat Rent	2017	2017	2020	AH has converted all of the Flat Rent paying families to income-based rent. AH only offers the income-based rent option for current and future program participants.
SH 2017.01	Next Step Youth Self-Sufficiency Program	2017	N/A	2021	AH never implemented this activity because the activity relied on receiving Foster Youth referrals aging out of foster care from the State of GA. Although an MOU was in place, AH did not receive any referrals from the state to date and AH reallocated those vouchers to create other homelessness prevention programs.

## V. SOURCES AND USES OF MTW FUNDS

### A. ESTIMATED SOURCES AND USES OF MTW FUNDS

#### i. Estimated Sources of MTW Funds

The MTW PHA shall provide the estimated sources and amount of MTW funding by Financial Data Schedule (FDS) line item.

FDS LINE ITEM NUMBER	FDS LINE ITEM NAME	DOLLAR AMOUNT
70500 (70300+70400)	Total Tenant Revenue	\$4,654,022
70600	HUD PHA Operating Grants	\$309,918,867
70610	Capital Grants	\$3,266,428
70700 (70710+70720+70730+70740+70750)	Total Fee Revenue	\$324,322
71100+72000	Interest Income	\$228,402
71600	Gain or Loss on Sale of Capital Assets	\$124,500
71200+71300+71310+71400+71500	Other Income	\$871,548
70000	Total Revenue	\$319,388,089

#### ii. Estimated Uses of MTW Funds

The MTW PHA shall provide the estimated uses and amount of MTW spending by Financial Data Schedule (FDS) line item.

FDS LINE ITEM NUMBER	FDS LINE ITEM NAME	DOLLAR AMOUNT
91000 (91100+91200+91400+91500+91600+91700+91800+91900)	Total Operating - Administrative	\$51,413,947
91300+91310+92000	Management Fee Expense	\$960,356
91810	Allocated Overhead	\$0
92500 (92100+92200+92300+92400)	Total Tenant Services	\$3,466,051
93000 (93100+93600+93200+93300+93400+93800)	Total Utilities	\$3,014,669
93500+93700	Labor	\$0
94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	\$4,565,933
95000 (95100+95200+95300+95500)	Total Protective Services	\$1,406,042
96100 (96110+96120+96130+96140)	Total Insurance Premiums	\$867,741
96000 (96200+96210+96300+96400+96500+96600+96800)	Total Other General Expenses	\$11,404,048
96700 (96710+96720+96730)	Total Interest Expense & Amortization Cost	\$156,368
97100+97200	Total Extraordinary Maintenance	\$5,346,506
97300+97350	HAP + HAP Portability-In	\$152,643,460
97400	Depreciation Expense	\$2,902,239
97500+97600+97700+97800	All Other Expense	\$81,240,728
90000	Total Expenses	\$319,388,089

Please describe any variance between Estimated Total Revenue and Estimated Total Expenses:

N/A

**iii. Description of Planned Use of MTW Single Fund Flexibility**

The MTW PHA shall provide a thorough narrative of planned activities that use only the MTW single fund flexibility. Where possible, the MTW PHA may provide metrics to track the outcomes of these programs and/or activities. Activities that use other MTW authorizations in Attachment C and/or D of the Standard MTW Agreement (or analogous section in a successor MTW Agreement) do not need to be described here, as they are already found in Section (III) or Section (IV) of the Annual MTW Plan. The MTW PHA shall also provide a thorough description of how it plans to use MTW single fund flexibility to direct funding towards specific housing and/or service programs in a way that responds to local needs (that is, at a higher or lower level than would be possible without MTW single fund flexibility).

PLANNED USE OF MTW SINGLE FUND FLEXIBILITY
<p>AH expended MTW Funds, defined as combining its Public Housing Operating Subsidy, Housing Choice Voucher funds, and certain capital funds into a single fund pursuant to the authority outlined in AH's MTW Agreement, on MTW eligible activities. AH exhausted its Replacement Housing Factor (RHF) Funds in FY 2020 and did not include them in the MTW Funds although the MTW Agreement permits AH to do so.</p> <p>AH cannot identify a singular activity nor multiple activities in which AH utilized only the MTW Single Fund Flexibility that do not require MTW Authorization(s) under Attachment C or D of AH's Standard and Restated MTW Agreement. However, AH did initiate steps to direct funding towards specific housing and service delivery programs that respond to local needs or as set forth in AH's business plan and as AH determined to best use of funds for the purposes of fulfilling its mission to deliver innovative, affordable housing. An example includes plans to direct funds towards planned high-rise construction projects with underground parking. This future project could directly address the shortfall of affordable 1 and 2 bedroom units in AH's service jurisdiction.</p>

**B. LOCAL ASSET MANGEMENT PLAN**

i. Is the MTW PHA allocating costs within statute?

Yes

ii. Is the MTW PHA implementing a local asset management plan (LAMP)?

Yes

iii. Has the MTW PHA provided a LAMP in the appendix?

Yes, please see page TBD of Appendix D

iv. If the MTW PHA has provided a LAMP in the appendix, please describe any proposed changes to the LAMP in the Plan Year or state that the MTW PHA does not plan to make any changes in the Plan Year.

AH does not plan to make any changes to the LAMP during FY 2022.

## C. RENTAL ASSISTANCE DEMONSTRATION (RAD) PARTICIPATION

### i. Description of RAD Participation

The MTW PHA shall provide a brief description of its participation in RAD. This description must include the proposed and/or planned number of units to be converted under RAD, under which component the conversion(s) will occur, and approximate timing of major milestones. The MTW PHA should also give the planned/actual submission dates of all RAD Significant Amendments. Dates of any approved RAD Significant Amendments should also be provided.

#### RENTAL ASSISTANCE DEMONSTRATION (RAD) PARTICIPATION

AH received a portfolio award to convert 3,741 PH units to long-term Section 8 assistance under the RAD Program. AH elected to convert its PH units to PBV assisted units. AH submitted a RAD Significant Amendment to HUD that HUD approved on November 15, 2016. AH has converted 1,340 units and plans to convert 463 units during FY 2022. AH received several Commitment to Enter into Housing Assistance Payments (CHAPs) in 2018. AH is working to convert those properties by FY 2022. AH anticipates that it will convert the remaining approved portfolio award by FYE 2027.

### ii. Has the MTW PHA submitted a RAD Significant Amendment in the appendix? A RAD Significant Amendment should only be included if it is a new or amended version that requires HUD approval.

No

### iii. If the MTW PHA has provided a RAD Significant Amendment in the appendix, please state whether it is the first RAD Significant Amendment submitted or describe any proposed changes from the prior RAD Significant Amendment?

N/A

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## VI. ADMINISTRATIVE

### A. BOARD RESOLUTION AND CERTIFICATIONS OF COMPLIANCE

Please **see page TBD of Appendix A** to review the Board Resolution and Certifications of Compliance.

### B. DOCUMENTATION OF PUBLIC PROCESS

**AH made its FY 2022 MTW Annual Plan available** for public review and comment at AH-Owned communities, on its website, and through social media mediums from **February 7 through March 9**. In addition, AH held a series of public meetings and a public hearing during this time to receive comments on planned activities. Further, AH permits public discussion of agenda items prior to their adoption. Please **see page TBD of Appendix B** to review AH's public process.

### C. PLANNED AND ONGOING EVALUATIONS

There are no AH directed nor HUD required evaluations included in this Plan. AH may conduct internal evaluations on its MTW Demonstration Program, MTW Activities, or other areas of performance, which AH will include in the Annual MTW Report as applicable and appropriate.

### D. LOBBYING DISCLOSURE

AH does not engage in lobbying activities. Therefore, AH only includes the Certification of Payments form (HUD-50071). Please **see page TBD of Appendix E** to review applicable document.

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***End Form 50900***

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## **Appendix A: Requirements of AH's MTW Agreement**

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Board Secretary Certificate, Board Resolution, and  
Certifications of Compliance

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## SECRETARY'S CERTIFICATE

I, **EUGENE E. JONES, JR.**, 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 ("AH"). 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 AH to submit its Fiscal Year 2022 Moving to Work (MTW) Annual Plan to the United States Department of Housing and Urban Development and to implement the projects, activities, initiatives, and any policy changes described therein, and other related matters.

3. This resolution was presented to the AH Board of Commissioners (the "Board") at its Regular Meeting on March 24, 2021 (the "Meeting").

4. The following Board members were present for the Meeting:

Christopher Edwards, MD, Chair

Pat D. Dixon, Jr. Esq.

Rosalind Elliott

Yunice Emir

Sheila Harris

Robert Highsmith, Jr. Esq.

Kirk Rich

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 24<sup>th</sup> day of March 2021.

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**EUGENE E. JONES, JR.,**  
**Board Secretary**

**SEAL**

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**CERTIFICATIONS OF COMPLIANCE**

**U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT  
OFFICE OF PUBLIC AND INDIAN HOUSING**

**Certifications of Compliance with Regulations:  
Board Resolution to Accompany the Annual Moving to Work Plan**

Acting on behalf of the Board of Commissioners of the Moving to Work Public Housing Agency (MTW PHA) listed below, as its Chairman or other authorized MTW PHA official if there is no Board of Commissioners, I approve the submission of the Annual Moving to Work Plan for the MTW PHA Plan Year beginning (DD/MM/YYYY), hereinafter referred to as "the Plan", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:

- (1) The MTW PHA published a notice that a hearing would be held, that the Plan and all information relevant to the public hearing was available for public inspection for at least 30 days, that there were no less than 15 days between the public hearing and the approval of the Plan by the Board of Commissioners, and that the MTW PHA conducted a public hearing to discuss the Plan and invited public comment.
- (2) The MTW PHA took into consideration public and resident comments (including those of its Resident Advisory Board or Boards) before approval of the Plan by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the Annual MTW Plan.
- (3) The MTW PHA certifies that the Board of Directors has reviewed and approved the budget for the Capital Fund Program grants contained in the Capital Fund Program Annual Statement/Performance and Evaluation Report, form HUD-50075.1 (or successor form as required by HUD).
- (4) The MTW 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, and title II of the Americans with Disabilities Act of 1990.
- (5) The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.
- (6) The Plan contains a certification by the appropriate state or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice, for the MTW PHA's jurisdiction and a description of the manner in which the Plan is consistent with the applicable Consolidated Plan.
- (7) The MTW PHA will affirmatively further fair housing by fulfilling the requirements at 24 CFR 903.7(o) and 24 CFR 903.15(d), which means that it will take meaningful actions to further the goals identified in the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR 5.150 through 5.180, that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing, and that it will address fair housing issues and contributing factors in its programs, in accordance with 24 CFR 903.7(o)(3). Until such time as the MTW PHA is required to submit an AFH, and that AFH has been accepted by HUD, the MTW PHA will address impediments to fair housing choice identified in the Analysis of Impediments to fair housing choice associated with any applicable Consolidated or Annual Action Plan under 24 CFR Part 91.
- (8) The MTW PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
- (9) In accordance with 24 CFR 5.105(a)(2), HUD's Equal Access Rule, the MTW PHA will not make a determination of eligibility for housing based on sexual orientation, gender identify, or marital status and will make no inquiries concerning the gender identification or sexual orientation of an applicant for or occupant of HUD-assisted housing.
- (10) The MTW 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.
- (11) The MTW 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.
- (12) The MTW PHA will comply with requirements with regard to a drug free workplace required by 24 CFR § 24, Subpart F.
- (13) The MTW PHA will comply with requirements 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.

- (14) The MTW 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.
- (15) The MTW PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
- (16) The MTW PHA will provide HUD or the responsible entity any documentation needed to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58. Regardless of who acts as the responsible entity, the MTW PHA will maintain documentation that verifies compliance with environmental requirements pursuant to 24 Part 58 and 24 CFR Part 50 and will make this documentation available to HUD upon its request.
- (17) With respect to public housing and applicable local, non-traditional development the MTW PHA will comply with Davis-Bacon or HUD determined wage rate requirements under section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
- (18) The MTW PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.
- (19) The MTW PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.
- (20) The MTW 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 200.
- (21) The MTW PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the Moving to Work Agreement and Statement of Authorizations and included in its Plan.
- (22) All attachments to the Plan have been and will continue to be available at all times and all locations that the Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the MTW PHA in its Plan and will continue to be made available at least at the primary business office of the MTW PHA.

\_\_\_\_\_  
**MTW PHA NAME**

\_\_\_\_\_  
**MTW PHA NUMBER/HA CODE**

*I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802).*

\_\_\_\_\_  
**NAME OF AUTHORIZED OFFICIAL**

\_\_\_\_\_  
**TITLE**

\_\_\_\_\_  
**SIGNATURE**

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

\* **Must be signed by either the Chairman or Secretary of the Board of the MTW PHA's legislative body. This certification cannot be signed by an employee unless authorized by the MTW PHA Board to do so. If this document is not signed by the Chairman or Secretary, documentation such as the by-laws or authorizing board resolution must accompany this certification.**

**TO AUTHORIZE THE HOUSING AUTHORITY OF THE CITY OF ATLANTA, GEORGIA TO  
SUBMIT FISCAL YEAR 2022 MOVING TO WORK ANNUAL PLAN TO THE UNITED  
STATES DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT**

**RESOLUTION OPS-1**

**WHEREAS**, The Housing Authority of the City of Atlanta, Georgia (“AH”) executed its Amended and Restated Moving To Work Agreement, effective as of November 13, 2008, as further amended by that certain Second Amendment to the Moving To Work Agreement, effective as of January 16, 2009; and as extended by Congress to June 30, 2028 under the same terms and conditions confirmed by the United States Department of Housing and Urban Development (“HUD”) on April 14, 2016;

**WHEREAS**, the MTW Agreement is effective through June 30, 2028, unless further extended;

**WHEREAS**, the MTW Agreement requires AH to submit an MTW Annual Plan to HUD in lieu of the Annual Plan and Five-Year Plan traditionally required by Section 5A of the United States Housing Act of 1937, as amended;

**WHEREAS**, the during each year of the MTW demonstration period, an MTW Annual Plan must be submitted to HUD with a resolution adopted by the AH Board of Commissioners (“Board”) approving the plan and certifying that a public hearing has been held regarding the plan;

**WHEREAS**, AH has prepared its Fiscal Year (“FY”) 2022 MTW Annual Plan (also referred to herein as the “FY 2022 MTW Annual Plan”);

**WHEREAS**, the FY 2022 MTW Annual Plan identifies AH’s priorities, projects, activities and initiatives for AH’s FY 2022 and any policy changes to be implemented during FY 2022;

**WHEREAS**, AH’s FY 2022 MTW Annual Plan is the product of a comprehensive planning process in which AH’s Senior Management consulted with AH’s Board of Commissioners, resident association leaders, public housing-assisted residents, Housing Choice participants and landlords, AH employees, Atlanta Legal Aid, Georgia Law Center for the Homeless, AH’s private sector development partners, members of the Service Provider Network, local political and government officials, various city and state agencies, other stakeholders and members of the public;

**WHEREAS**, comments and suggestions were made at those various meetings, all of which were considered by Senior Management of AH and incorporated as deemed appropriate;

**WHEREAS**, the consultation process included a properly advertised and noticed public hearing held on February 25, 2021;

**WHEREAS**, during FY 2022, AH will continue to advance its real estate initiatives to create more housing opportunities, to advance its human development and self-sufficiency initiatives, and to streamline its service delivery approach and financial protocols;

**WHEREAS**, AH’s Senior Management consulted with the Board of Commissioners to solicit their input, guidance and direction regarding the proposed projects, activities, initiatives and policy changes that will be implemented during FY 2022, as described in Exhibit OPS-1-A;

**WHEREAS**, the Amended and Restated Statement of Corporate Policies is the controlling policy document governing the assistance programs administered by AH;

**WHEREAS**, the Amended and Restated Statement of Corporate Policies is organized into four chapters and captures the Moving to Work Demonstration policy innovations in effect for the AH's Mixed-Income, Mixed-Finance Communities ("MIXED Communities"), AH-Owned Communities, Housing Choice Tenant-Based Program, HomeFlex Programs, and HAVEN Supportive Housing Programs (collectively "Rental Assistance Programs"); and

**WHEREAS**, Senior Management of AH is now recommending that the Board of Commissioners: (i) approve AH's FY 2022 MTW Annual Plan; (ii) authorize the submission of AH's FY 2022 MTW Annual Plan to HUD; (iii) authorize the Chair or the Vice Chair of the Board of Commissioners and AH's President and Chief Executive Officer/Secretary to execute the HUD Certifications of Compliance, attached as Exhibit OPS-1-B; (iv) approve the implementation of the projects, activities, initiatives and any policy changes set forth in the FY 2022 MTW Annual Plan; and (v) approve the adoption and implementation of the Amended and Restated Statement of Corporate Policies as set forth in the FY 2022 MTW Annual Plan;

**NOW, THEREFORE, BE IT RESOLVED BY THE BOARD OF COMMISSIONERS OF THE HOUSING AUTHORITY OF THE CITY OF ATLANTA, GEORGIA ("AH"), THAT:**

1. AH's FY 2022 MTW Annual Plan, including the projects, activities, initiatives and any policy changes that will be implemented during FY 2022 as described in Exhibit OPS-1-A, is hereby approved.
2. Each of the Chair or the Vice Chair of the Board of Commissioners, as required, and the President and Chief Executive Officer/Secretary is hereby authorized to execute Exhibit OPS-1-B and any other required documents, certifications or United States Department of Housing and Urban Development (HUD) forms related to the approval and filing of AH's FY 2022 MTW Annual Plan.
3. The Amended and Restated Statement of Corporate Policies, is hereby approved in conjunction with AH's FY 2021 Annual Plan, and AH is hereby authorized to adopt and implement such policies.
4. The President and Chief Executive Officer is authorized to submit AH's FY 2022 MTW Annual 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.
5. The President and Chief Executive Officer and any person or persons designated and authorized to so act by the President and Chief Executive Officer are hereby authorized to implement the projects, activities, initiatives and any policy changes set forth in the FY 2022 MTW Annual Plan.

**Appendix A: Board Resolution**

ADOPTED, by the Board of Commissioners of The Housing Authority of the City of Atlanta, Georgia and signed in authentication of its passage, 24<sup>th</sup> day of March 2021.

ATTEST:

APPROVAL:

\_\_\_\_\_  
**Eugene E. Jones, Jr.**  
**President and Chief Executive Officer**

\_\_\_\_\_  
**Christopher R. Edwards, M.D.**  
**Chair**

APPROVAL FOR FORM AND LEGAL SUFFICIENCY:

\_\_\_\_\_  
**Lisa Y. Washington**  
**Interim General Counsel**

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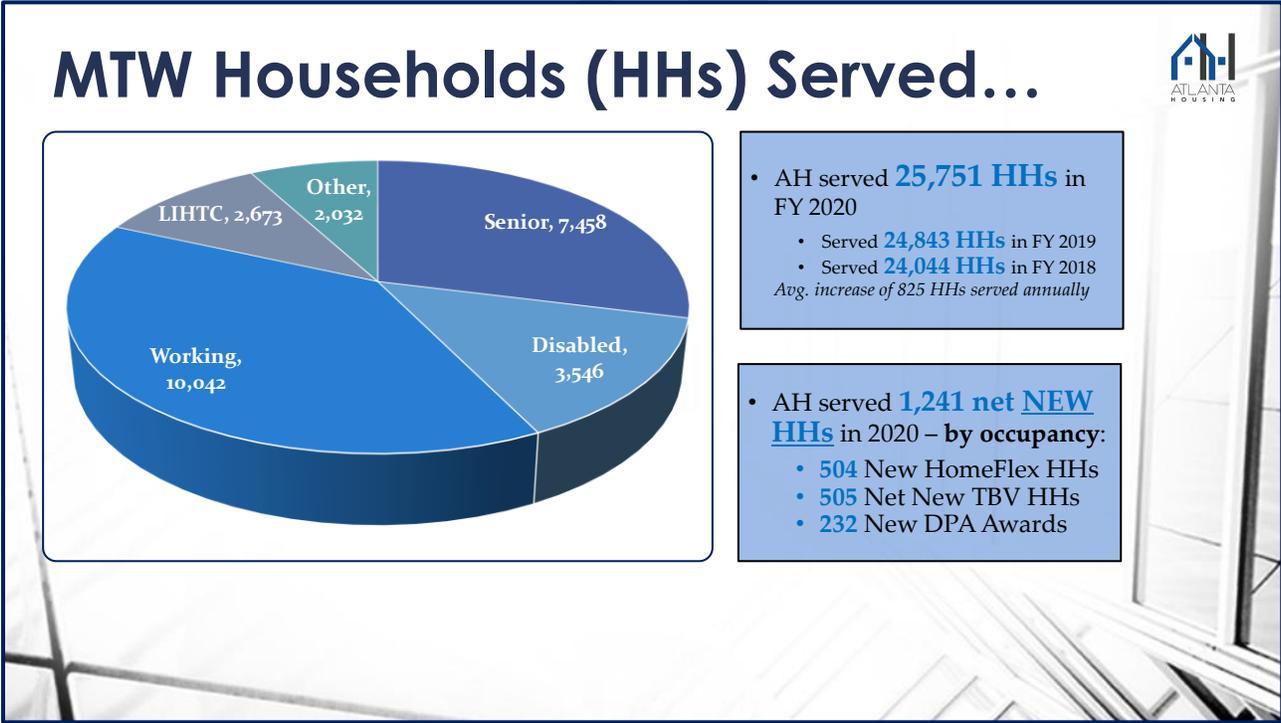
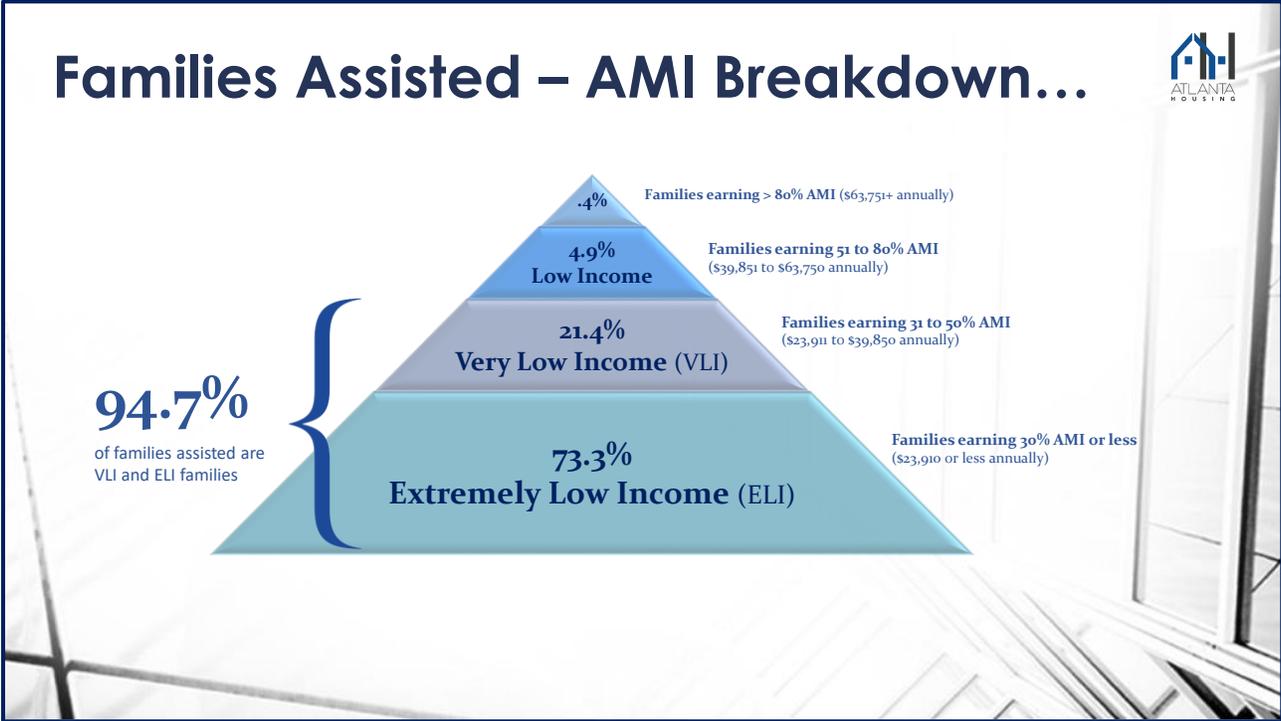
FY 2022 MTW ANNUAL PLAN BOARD PRESENTATION



## Moving to Work (MTW) Reminders...



- AH is **required to meet MTW Statutory Requirements:**
  - Ensure that at least 75% of households assisted are very low-income (95% are VLI and below).
  - Establish a reasonable rent policy designed to encourage employment and self-sufficiency.
  - Continue to assist substantially the same number of households as would have without MTW designation.
  - Maintain a comparable mix of households, by family size, as would have without MTW designation (1% change since MTW inception).
  - Ensure that MTW-assisted housing meets established HQS.



# LIVE. WORK. THRIVE. Outcomes...

## GOALS

- Create or Preserve 2,700 affordable housing units.
- 84% voucher utilization rate (+).
- 1,000 new households served (+).
- 78% Work/Program Compliance rate.

## RESULTS

- Missed by 12% - created/preserved 2,369 affordable housing units (88%).
- Exceeded by 3% - 87% utilization by issuance\* or 83% utilization by actual payments\*\*.
- Exceeded by 24% - 1,241 net new households served.
- Missed by 6% - 72% raw compliance rate and 78% by weighted average.

\*Includes program searching families.  
 \*\*Reflects actual payments by AH to property owners once the family finds a unit and signs a lease.

# MTW Activity Highlights...

- **9.2% increase** in Earned Income\* from 2019.
- **Assisted 244 families** with short-term housing assistance through AH's Home Again Program.
- **Added 548 additional units**: 504 under HomeFlex and 44 under Housing Choice.
- **Created\*\* 153 new affordable housing units**: Capitol View (56) & Herndon Square - Sr. (97).
- **Completed 135 new housing units** at Ashley IA and Ashley IB through Choice Neighborhoods and **leased 100% of the affordable units**: 54 HomeFlex units (other unit types, approx. 80% leased).



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\*We anticipate a sharp decrease in FY 2021 because we temporarily suspended enforcement of our Work/Program Requirement in response to the pandemic.  
 \*\*Based on financial closing

## Agency Activity Highlights...

- **Converted 918 PH units to PBV units** through the Rental Assistance Demonstration (RAD) Program.



- **Achieved 97% of Housing Choice (HC) leasing goal.**

- **HC created 3 new HAVEN Programs:** Integrated Care Permanent Supportive Housing (PSH), RISE-II, and 5-year Mainstream with new or re-purposed TBVs.

- **Processed 1,125 new TBV households,** 215 were for TBV HAVEN.

## Agency Activity Highlights...



- **Conducted 8,259 HQS inspections** and randomly performed quality control inspections on inspected units.
- **Implemented safety measures at AH-owned communities** and AH facilities.

- **Served 1,315 families through** case management, senior services, and youth services administered under AH's **Human Development Services (HDS)**.

- **Prepared 1,607 families for mixed-income living** through AH's **Good Neighbor II Program** administered by HDS.



- **Awarded 33 scholarships** for a cumulative total of 176 scholarships and nearly \$650,000 awarded since inception.



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**MTW PROGRAM BENCHMARKS**

**Source:** Legacy Attachment D, MTW Program Benchmarks and MTW Program Benchmark Definitions

**Reference:** AH's Amended and Restated Moving to Work Agreement (MTW Agreement), effective as of November 13, 2008; and as further amended by the Second Amendment effective January 16, 2009; and as extended by Congress to June 30, 2028 and confirmed by HUD on April 14, 2016.

**Description:** The following table outlines AH's performance outcomes as set forth in Legacy Attachment D

Measurable Outcome	Baseline	Benchmark	2020 Actual	Benchmark Outcome
<b>Public Housing Program</b>				
• % Rents Uncollected	2.0%	2.0%	1.6%	Meets Benchmark
• Occupancy Rate	98%	98%	95%	Benchmark Not Achieved
• Emergency Work Orders Completed or Abated in < 24 hours	99%	99%	98%	Benchmark Not Achieved
• Routine Work Orders Completed in < 30 Days	5 Days	30 Days	10 Days	Meets Benchmark
• % Planned Inspections Completed	100%	100%	100%	Exceeds Benchmark
<b>Housing Choice Program (Section 8)</b>				
• Budget Utilization Rate	98%	98%	100%	Exceeds Benchmark
• Success Rates (Lease-up)	N/A	66%	59%	Benchmark Not Achieved
• % Planned Annual Inspections Completed	98%	98%	88%	Benchmark Not Achieved
• Quality Control Inspections	≥ 1.4%	≥ 1.4%	2.1%	Exceeds Benchmark
<b>Community and Support Service</b>				
• Resident Homeownership	6	6	3	Benchmark Not Achieved
• Resident Workforce Participation	6,415	6,236	5,917	Benchmark Not Achieved
<b>Finance</b>				
• Project-Based Financing Closings	N/A	3	10	Exceeds Benchmark

With regard to benchmark outcomes bearing, 'Benchmark Not Achieved', AH offers the following potential explanations:

Occupancy Rate - AH **strategically operated several communities under a leasing moratorium** to provide vacant units in connection with RAD conversions. In addition, the **COVID-19 pandemic affected leasing operations** during the last quarter of the fiscal year, which tends to be a high move-in, move-out season.

Success Rates - AH's **service jurisdiction is competitive** and in some cases families were unable to find suitable units to meet their housing needs. In addition, the COVID-19 stay at home order-affected families' ability to search and lease up before June 30, 2020.

HC Inspections Completed - AH was ahead of schedule to complete its planned inspections; however, the **COVID-19 pandemic affected AH's inspection process** and **some inspections had to be scheduled after June 30**.

Resident Homeownership - Although AH actively markets its Down Payment Assistance (DPA) Program, the **DPA Program is voluntary** and predicated on families interested in purchasing a home, as well as other factors. **Resident interest has been minimal**.

Resident Workforce Participation - AH aligned its work requirement with employer scheduling practices; however, the **COVID-19 pandemic influenced AH to suspend the enforcement of the requirements** temporarily.

## **Appendix B: Public Process**

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### Documentation

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AH held its **Public Comment Period** on its FY 2022 MTW Annual Plan from **February 7 through March 9, 2021**

Because of the Coronavirus (COVID-19) global pandemic, **AH suspended public in-person meetings/hearings** and some internal in-person meetings.

As an alternative, AH conducted virtual public meetings and a public hearing on its FY 2022 Moving to Work (MTW) Annual Plan using the Zoom platform on:

February 9 at 9:30a

February 11 at 9:30a – Jurisdiction-Wide Council  
(Resident Council Leadership Members)

February 16 at 9:30a

February 18 at 9:30a

**February 25 at 6p – Public Hearing**

March 4 at 9:30a

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**Appendix C: Requirements of AH's MTW Agreement - Elements of Legacy Attachment B and AH's MTW Program Benchmarking Data**

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## Appendix C: Elements of Legacy Attachment B

### ELEMENT I. HOUSEHOLDS SERVED By Program/Housing Type

		Household Served Totals					
Community & Program Type	Assistance Type^	FY 2017 Actual	FY 2018 Actual	FY 2019 Actual	FY 2020 Actual	FY 2021 EOY Projection	FY 2021 EOY Projection
AH-Owned	PH	1,793	1,586	1,586	1,261	1,003	540
MIXED	PH	2,221	2,155	2,155	1,562	1,170	727
	RAD PBV	0	423	423	1,503	1,991	2,453
	HF	1,775	1,543	1,509	1,358	1,521	1,533
	LIHTC	1,171	1,131	1,084	1,088	1,085	1,086
HomeFlex	HF	3,364	4,012	4,230	4,803	4,990	5,090
	LIHTC	1,525	1,595	1,589	1,585	1,585	1,585
Housing Choice: Tenant-Based	HCV	8,381	8,608	9,094	9,393	9,404	9,589
Housing Choice: Ports	HCV	2,086	2,029	1,860	1,711	1,402	1,685
Housing Choice: Homeownership	HCV	25	23	19	18	18	17
Homeownership - Other	DPA	553	724	993	1,225	1,398	1,635
Short-Term Housing Assistance	MTW	199	215	380	244	250	250
<b>Totals:</b>		<b>23,093</b>	<b>24,044</b>	<b>24,922</b>	<b>25,751</b>	<b>25,817</b>	<b>26,190</b>

<sup>^</sup>Assistance Type: PH = Public Housing, RAD PBV = Rental Assistance Demonstration Project-Based Voucher, HF = HomeFlex, LIHTC = Low-Income Housing Tax Credit, HCV = Housing Choice Voucher, DPA = Down Payment Assistance, MTW = Moving-to-Work

## Appendix C: Elements of Legacy Attachment B

### By Unit Size

Community & Program Type	FY 2019 Households by Unit Size						FY 2020 Households by Unit Size						2019 to 2020	
	0/1 BRs	2 BRs	3 BRs	4 BRs	5+ BRs	Total	0/1 BRs	2 BRs	3 BRs	4 BRs	5+ BRs	Total	# Change	% Change
AH-Owned	1,425	45	19	29	0	1,518	1,137	45	19	29	0	1,230	-288	-19.0%
MIXED	1,455	1,467	553	48	0	3,523	1,276	1,153	377	27	0	2,833	-690	-19.6%
RAD PBV Conversions	366	31	5	0		402	736	354	177	19	0	1,286	884	219.9%
HomeFlex	2,608	1,296	177	5	0	4,086	2,985	1,387	199	4	0	4,575	489	12.0%
Housing Choice: Tenant-Based	2,897	3,110	2,381	706	0	9,094	2,323	3,423	2,770	758	119	9,393	299	3.3%
Housing Choice: Ports	375	609	660	189	27	1,860	329	563	604	184	31	1,711	-149	-8.0%
<b>Totals:</b>	<b>9,126</b>	<b>6,558</b>	<b>3,795</b>	<b>977</b>	<b>27</b>	<b>20,483</b>	<b>8,786</b>	<b>6,925</b>	<b>4,146</b>	<b>1,021</b>	<b>150</b>	<b>21,028</b>	<b>545</b>	<b>2.7%</b>

## Appendix C: Elements of Legacy Attachment B

### By Family Composition

Community & Program Type	FY 2019 Households by Family Size						FY 2020 Households by Family Size						2019 to 2020	
	1 Member	2 Member	3 Member	4 Member	5+ Member	Total	1 Member	2 Member	3 Member	4 Member	5+ Member	Total	# Change	% Change
AH-Owned	1,368	100	14	14	22	1,518	1,099	78	15	14	24	1,230	-288	-19.0%
MIXED	1,455	1,467	553	48	0	3,523	1,617	559	355	183	118	2,832	-691	-19.6%
RAD PBV Conversions	354	36	11	1	0	402	797	234	146	64	46	1,287	885	220.1%
HomeFlex	2,979	733	216	106	52	4,086	3,353	823	241	104	54	4,575	489	12.0%
Housing Choice: Tenant-Based	2,862	2,274	1,696	1,175	1,087	9,094	2,955	2,372	1,747	1,179	1,140	9,393	299	3.3%
Housing Choice: Ports	Unk	Unk	Unk	Unk	Unk		337	309	327	362	376	1,711	1,711	Unk
<b>Totals:</b>	<b>9,018</b>	<b>4,610</b>	<b>2,490</b>	<b>1,344</b>	<b>1,161</b>	<b>18,623</b>	<b>10,158</b>	<b>4,375</b>	<b>2,831</b>	<b>1,906</b>	<b>1,758</b>	<b>21,028</b>	<b>2,405</b>	<b>12.9%</b>

## Appendix C: Elements of Legacy Attachment B

### By Area Median Income (AMI) Group

Community & Program Type	FY 2019 Households by Income Group					FY 2020 Households by Income Group					2019 to 2020	
	≤ 30% AMI	31 - 50% AMI	51 - 80% AMI	> 80% AMI	Total	≤ 30% AMI	31 - 50% AMI	51 - 80% AMI	> 80% AMI	Total	# Change	% Change
AH-Owned	1,364	133	18	3	1,518	1,099	117	11	3	1,230	-288	-19.0%
MIXED	2,425	889	199	10	3,523	1,978	683	155	16	2,832	-691	-19.6%
RAD PBV Conversions	341	54	7	0	402	963	248	67	9	1,287	885	220.1%
HomeFlex	3,135	831	117	3	4,086	3,424	1,012	135	4	4,575	489	12.0%
Housing Choice: Tenant-Based	6,242	2,219	591	42	9,094	6,573	2,197	576	47	9,393	299	3.3%
Housing Choice: Ports	1,599	226	34	1	1,860	1,702	3	6	0	1,711	-149	-8.0%
<b>Totals:</b>	<b>15,106</b>	<b>4,352</b>	<b>966</b>	<b>59</b>	<b>20,483</b>	<b>15,739</b>	<b>4,260</b>	<b>950</b>	<b>79</b>	<b>21,028</b>	<b>545</b>	<b>2.7%</b>

	Total ≤ 50% AMI (VLI & ELI Families)	Total > 50% AMI
Number of HHs by Income	19,914	1,114
% of HHs Served	95%	5%

## Appendix C: Elements of Legacy Attachment B

### By Waiting List Characteristics

Community & Program Type	FY 2020 WL Households by Unit Size					FY 2020 WL Households by Family Size					FY 2020 WL HHs by Income Group				FY 2020 Total
	Studio	1 BR	2 BR	3 BR	4+ BR	1 Mbr	2 Mbr	3 Mbr	4 Mbr	5+ Mbr	≤ 30% AMI	31 - 50% AMI	51 - 80% AMI	> 80% AMI	
AH-Owned		2,681	158	129	6						2,684	262	23	5	2,974
MIXED	0	11,370	11,176	7,915	622						14,191	15,868	920	104	31,083
RAD PBV Conversions															0
HomeFlex	15	6,758	4,382	3,113	3						6,378	5,736	2,098	59	14,271
Housing Choice: Tenant-Based						5,026	7,270	5,825	3,553	2,831	19,551	4,152	655	147	24,505
<b>Totals:</b>	<b>15</b>	<b>20,809</b>	<b>15,716</b>	<b>11,157</b>	<b>631</b>	<b>5,026</b>	<b>7,270</b>	<b>5,825</b>	<b>3,553</b>	<b>2,831</b>	<b>42,804</b>	<b>26,018</b>	<b>3,696</b>	<b>315</b>	<b>72,833</b>

**Note:** Waiting List data is fluid. AH attributes changes in total to ongoing applicant pulls and list purges throughout the year. Therefore, reflected data is a “snapshot” of each Waiting List as of June 30, 2020.

## Appendix C: Elements of Legacy Attachment B

### ELEMENT II. OCCUPANCY POLICIES

In general terms, AH codifies this information in its Statement of Corporate Policies (SCP), which is located on our website at <https://www.atlantahousing.org/about-us/plans-reports/>. You may contact Lenny Koltochnik, Policy Research Director at [lenny.koltochnik@atlantahousing.org](mailto:lenny.koltochnik@atlantahousing.org) with specific questions.

### ELEMENT III. CHANGES IN HOUSING STOCK

AH is undergoing a repositioning of its public housing stock by converting public housing units to long-term Section 8 project-based voucher assisted units under the Rental Assistance Demonstration (RAD) Program. AH submits inventory information to HUD each month via the Public and Indian Housing Information Center (PIC).

### ELEMENTS IV AND V. SOURCES AND AMOUNTS OF FUNDING AND USES OF FUNDS

AH is required to submit funding information in the prescribed Financial Data Schedule (FDS) format through the Financial Assessment System – PHA (FASPHA) by August 31 annually.

### ELEMENT VI. CAPITAL PLANNING

AH includes an overview of actual capital expenditures, please **see page 23** of this document. Detailed information is included in our Annual Operating Budget and Comprehensive Annual Financial Report (CAFR).

### ELEMENT VII. MANAGEMENT INFORMATION FOR OWNED/MANAGED UNITS

Under this element, AH set a number of guidelines for its rental and housing assistance programs owned or managed by AH. Attachment D of AH's Amended and Restated MTW Agreement lists these guidelines, collectively referred to as MTW Program Benchmarks. AH provides actual performance of its MTW Program Benchmarks, please **see page TBD** of this document. Further, AH plans to revisit these benchmarks during the fiscal year to update the measurable outcomes as appropriate.

#### Security

AH continues to address crime and safety in its communities through collaborative strategies with local law enforcement, neighbors, private development partners, property management developers (PMDs) and residents. Strategies taken to combat criminal elements in and around AH communities may have included:

- The provision of a security presence via concierge and staff within AH-Owned properties.
- Video surveillance and a community security channel.
- Best practice and lessons learned with the Atlanta Police Department (APD) to deter crime and enhance safety and security.
- Continued utilization of criminal screening standards and processes joined with stricter lease enforcement.
- Routine preventative maintenance tasks and making repairs and upgrades as necessary to ensure safety equipment remains operational.

### ELEMENT VIII. MANAGEMENT INFORMATION FOR LEASED HOUSING

#### Leasing Information

AH is required to submit funding information in the prescribed Financial Data Schedule (FDS) format through the Financial Assessment System – PHA (FASPHA) by August 31 annually.

## Appendix C: Elements of Legacy Attachment B

### Inspections Strategy

#### **AH Reviews of AH-Owned Communities**

Focused on providing and maintaining quality living environments throughout its real estate portfolio, AH provides an integrated assessment status of each property and works closely with its property management developer (PMD) partners to identify and address issues at the properties. Elements of AH's quality assurance program are as follows:

- (1) **Uniform Physical Conditions Standards (UPCS):** AH conducts UPCS quality assurance inspections annually at each property. An inspection of all common areas, all building systems, and a random selection of five percent of the units is completed. The inspections contribute to a reduction of systemic maintenance issues and an overall improvement in the physical condition of the communities.
- (2) **Elevator:** AH's elevator consultant continues to provide an annual audit for each elevator at the high-rise communities, as well as to coordinate with the PMDs on equipment modernization and ongoing routine maintenance. Regular equipment maintenance has led to improved operational up time and a decrease in resident complaints concerning elevators.
- (3) **Rental Integrity Monitoring (RIM):** The RIM review, conducted annually at each property, focuses on procedures related to the complete occupancy life cycle from the application to program termination. The findings from RIM help in the design of staff training, which in turn, has reduced the amount of errors identified.
- (4) **Procurement/Contracts:** AH conducts this regular on-site review to audit procedures related to the PMD procurements and contract management. PMD staff have made significant progress in maintaining best practices for documentation of contract administration and in public transparency and accountability.
- (5) **Finance/Accounting:** This internal financial audit, conducted annually at each property, is beneficial in identifying areas of concern within the properties' fiscal operations.
- (6) **Community Safety Risk:** AH conducts/requires an annual inspection at each property for administrative, technical, and physical security systems that enable PMDs to identify and mitigate safety issues at the communities. The inspection also includes items in accordance with AH's Risk/Safety, which complies with the Insurer's Work Plan instituted by AH's liability insurance company. Because of AH's Risk/Safety Program, AH insurance premiums have been reduced.
- (7) **Accessibility:** AH conducts annual inspections at each property to ensure community compliance with applicable Fair Housing and accessibility statutes, HUD guidelines, and AH's related policies and procedures. These inspections enable AH to have early detection and resolution of accessibility issues, identify process improvements, and identify topics for staff training.

#### **AH Reviews of Mixed Communities**

AH has worked to streamline and enhance the compliance review process by utilizing audits, inspections, and compliance reviews conducted by other agencies and compliance contractors. AH conducts the following reviews for the MIXED Communities:

- (1) **Business Process Reviews (BPRs):** AH conducts an annual Business Process Review at all mixed-income communities, which includes a review of the property operations and a physical review of randomly selected resident files. The primary purpose of the review is to confirm that site-based administration activities comply with legal agreements defining the obligation of the owner entities and professional property management companies, AH policies, and federal requirements with respect to the administration and maintenance of the site-based waiting list, property operations, enforcement of AH's

## Appendix C: Elements of Legacy Attachment B

Work Requirement, rent determination findings, and accessibility. Through BPRs, AH has been able to strengthen internal controls and external oversight of property performance related to defined measures above.

(2) **Financial:** AH reviews audited financial statements of mixed-income communities to identify trends that may affect the long-term financial viability and sustainability of the underlying asset. When there are growing concerns, impairments, audit findings, or material adverse changes that may influence the ability to meet obligations, AH works with the owner to develop a corrective action plan to resolve concerns or deficiencies as necessary.

### **ELEMENT IX. RESIDENT PROGRAMS**

AH offers residents and voucher-holders access to a variety of programs designed to increase program participants' economic independence and housing self-sufficiency through administration of its Human Development Services (HDS) business unit. This AH unit works to link program participants with appropriate supportive services.

### **ELEMENT X. OTHER INFORMATION AS REQUIRED**

AH is not required to provide any other information during this reporting period.

### **MTW PROGRAM BENCHMARK OUTCOMES**

Please **see page 98** of this document to review AH's Benchmarks and Outcomes.

**Appendix D: Local Asset Management Plan  
(LAMP)**

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### Background and Information

AH's Amended and Restated Moving to Work Agreement (MTW Agreement), effective as of November 13, 2008, and as further amended by the Second Amendment effective January 16, 2009, and as extended by Congress to June 30, 2028 and confirmed by HUD on April 14, 2016, authorizes AH to design and implement a Local Asset Management Plan (LAMP) for its Public Housing Program and describe such program in its Annual MTW Plan. The term "Public Housing Program" means the operation of properties owned or units in mixed-income communities subsidized under Section 9 of the US Housing Act of 1937, as amended ("1937 Act") by the Agency that are required by the 1937 Act to be subject to a public housing declaration of trust in favor of HUD. The Agency's LAMP shall include a description of how it is implementing project-based property management, budgeting, accounting, financial management, and any deviations from HUD's asset management requirements. Under the First Amendment of the MTW Agreement, AH agreed to describe its cost accounting plan as part of its LAMP including how the indirect cost fee for service rate is determined and applied.

### Project-Based Approach for Public Housing Program

AH maintains a project-based management approach by decentralizing property operations to each property and by contracting with private management companies to professionally manage each AH-Owned property under the Public Housing Program. AH maintains project-level budgeting and accounting for these properties.

In addition, each mixed-income, mixed-finance rental community that contain authority assisted units under the Public Housing Program are owned, managed, and operated by third party partnerships as established at the time each of the transactions were structured. AH maintains a separate budget and accounting for the operating subsidy paid to the owners of these mixed communities, but does not maintain the accounting for property operations as AH does not own or operate these properties.

### Identification of Cost Allocation Approach

AH approaches its cost allocation plan with consideration to the entire operation of AH, rather than a strict focus on only the MTW Program. The MTW Agreement addresses the cost accounting system in reference to the MTW Program without specifically addressing the operations of the entire Agency under MTW and using MTW Single Funds. This cost allocation plan addresses all AH operations, as well as the specific information required for the MTW Program

Under the MTW Agreement, the cost accounting options available to AH include either a "fee-for-service" methodology or an "indirect cost rate" methodology. AH can establish multiple cost objectives or a single cost objective for its MTW Program. AH opted to use the "fee-for-service" methodology and establish the MTW Program as a single cost objective as further described below.

### Classification of Costs

There is no universal rule for classifying certain costs as either direct or indirect under every accounting system. A cost may be direct with respect to some specific service or function, but indirect with respect to the Federal award or other final cost objective. Therefore, the definitions and guidelines provided in this LAMP are utilized for determining direct and indirect costs charged to the cost objectives.

## Appendix D: Local Asset Management Plan

### Definitions:

**Cost Objective** – a function, organizational subdivision, contract, grant, or other activities for which cost data are needed and for which costs are incurred.

**Direct Costs** – costs that can be identified specifically with a particular final cost objective.

**Indirect Costs** – costs that (a) incurred for a common or joint purpose benefitting more than one cost objective, and (b) not readily assignable to the cost objectives specifically benefitted, without effort disproportionate to the result achieved. After direct costs have been determined and assigned directly to Federal awards and other activities, as appropriate, indirect costs are determined as those remaining costs to be allocated to the benefitted costs objectives.

**Indirect Cost Fee-for-Service Rates** – used for determining in a reasonable manner, the proportion of indirect costs each cost objective should bear. It is the ratio (expressed as a percentage) of the indirect costs to a direct cost base.

**Cost Base** – Accumulated direct costs (normally either total direct salaries and wages or total direct costs exclusive of any extraordinary or distorting expenditures) used to distribute indirect costs to cost objectives (Federal awards). Generally, the direct cost base selected should result in each award bearing a fair share of the indirect costs in reasonable relation to the benefits received from the costs.

### AH Cost Objectives

AH has identified the following cost objectives:

#### **Direct Costs:**

**MTW Program** – all associated activities funded under the MTW Single Fund authority as a single cost objective. The single cost objective is the eligible MTW activities as articulated in AH's MTW Agreement and Annual MTW Plan.

**Revitalization Program** – includes the development related activity funded from Choice Neighborhoods, other Federal grants, or local funds. Generally, AH will capture costs for each development and will have the ability to track charges to specific funding sources.

**Special Purpose Housing Choice Tenant-Based Vouchers** – such vouchers include, but are not limited, to Family Unification Program (FUP) vouchers, Veterans Affairs Supportive Housing (VASH) vouchers, 1-year Mainstream (Non-Elderly Disabled (NED)) vouchers and 5-year Mainstream (Section 811) vouchers.

**Other Federal, State, and Local Awards** – Periodically, AH may receive other funding awards, and in these instances, AH will establish a separate cost objective for such awards as necessary.

**Non-Federal Program** – this category relates to entrepreneurial activities, some AH Affiliate/Component Units and National Housing Compliance, Inc., which are separate cost objectives.

### AH Direct Costs

AH defines direct costs in conjunction with the cost objectives defined in this Cost Allocation Plan. Under 2 CFR §200, there is no universal rule for classifying costs as either direct or indirect. A cost may be direct with respect to some specific service or function, but indirect with respect to the final cost objective.

**MTW Program** direct costs include, but are not limited to:

1. Contract costs readily identifiable with delivering housing assistance to low-income families under the MTW Program,
2. Housing Assistance Payments, including utility allowances, for tenant-based voucher and AH HomeFlex (AH's Project-Based Rental Assistance Program) supported communities,
3. Portability administrative fees,
4. Homeownership voucher funding,
5. Foreclosure and emergency assistance for low-income families served under the Housing Choice Voucher Program,
6. AH costs for administering Housing Choice Tenant-Based Voucher Rental Assistance Program, including inspection activities,
7. Operating costs directly attributable to operating AH-Owned properties,
8. Capital improvement costs at AH-Owned properties,
9. Operating subsidies paid to Mixed Communities,
10. AH costs associated with managing AH-Owned communities, HomeFlex, Housing Choice Homeownership Vouchers, Mixed Communities, and other AH-Owned real estate,
11. AH costs directly attributable to MTW Program activities, including the administration of human development and supportive services programs,
12. AH costs associated with development and revitalization activities with costs as defined in the next section, but paid using MTW Single Fund flexibility,
13. Any other activities that can be readily identifiable with delivering housing assistance to low-income families under the MTW Program.

**Development and Revitalization Program** direct costs include, but are not limited to, the following when costs are paid using non-MTW funds:

1. Leasing incentive fees,
2. Legal expenses,
3. Professional services,
4. Case management and other human services,
5. Relocation,
6. Extraordinary site work,
7. Demolition,
8. Acquisitions,
9. Program administration,
10. Gap financing in qualified real estate transactions,
11. Homeownership down payment assistance,
12. Investments, such as loans, grants, etc.,
13. Other development and revitalization expenditures.

## Appendix D: Local Asset Management Plan

**Special Purpose Housing Choice Tenant-Based Vouchers** direct costs include, but are not limited to, Housing Assistance Payments (HAP).

**Other Federal and State Awards** direct costs include, but are not limited to, any costs identified for which the award is made. Such costs are determined as AH receives awards.

**Non-Federal Programs** direct costs include, but are not limited to:

1. Legal expenses,
2. Professional services,
3. Utilities, such as gas, water, electric and similar utility service expenses,
4. Real Estate taxes,
5. Insurance,
6. Bank charges,
7. Staff training,
8. Interest expense,
9. Other costs required of a specific non-federal program, award, or contract.

### Direct Costs – Substitute System for Compensation of Personal Services

In addition to the direct costs identified previously, when required to charge direct staff time to a non-MTW funding source, AH will allocate direct salary and wages based upon quantifiable measures (substitute system) of employee effort rather than timesheets. This substitute system is allowed under 2 CFR §200.430. The substitute system permits AH to allocate direct costs on measures that are readily determined for each department more efficiently and effectively. Those departments and measures will be re-evaluated periodically and updated as necessary. The Operating Divisions functions and measures are listed below:

Operating Division	Quantifiable Measure
Construction and Facilities Management	<ul style="list-style-type: none"> <li>• Square footage of properties managed</li> </ul>
Housing Choice Voucher Program	<ul style="list-style-type: none"> <li>• Leased vouchers</li> </ul>
Inspection Services	<ul style="list-style-type: none"> <li>• Number of inspections</li> </ul>
Real Estate Group	<ul style="list-style-type: none"> <li>• Active revitalizations</li> <li>• Number of properties managed</li> <li>• Number of properties and developments supported</li> <li>• RAD Conversions</li> </ul>

### AH Fee-For-Service

Corporate Support consists of administrative and support departments that support the Operating Divisions and AH as a whole. AH establishes a Fee-for-Service Rate based on the anticipated indirect costs for the fiscal year. The Fee-for-Service Rate is determined in a reasonable manner where the proportion of indirect costs for each cost objective is determined as a ratio of the indirect costs to a direct cost base. The resulting amount is the fee-for-service amount charged to program not funded by the MTW Single Fund. Based on current budget estimates, AH projects the indirect cost fee to be approximately 11% of total direct costs.

**Limitation on indirect cost or administrative costs** – AH recognizes that there may be limitations on the amount of administrative or indirect costs charged to specific grant awards. Should such limitations prevent the charging of direct and indirect costs to a grant award AH will charge such costs to the remaining cost objectives as defined in this LAMP, while ensuring only authorized expenditures are charged to the cost objectives and their related funding sources. AH ensures that no costs are charged to Federal funds unless authorized under Federal law or regulation.

#### **Implementation of AH's Local Asset Management Plan**

AH began accounting for costs under this LAMP July 1, 2009 and began reporting under the Financial Data Schedule (FDS) for its fiscal year ending June 30, 2010. Such reporting includes the reporting of property level financial information for those properties under the Public Housing Program.

#### **Explanation of differences between HUD's and AH's property management systems**

AH has the ability to define costs differently than the standard definitions published in HUD's Financial Management Guidebook pertaining to the implementation of 24 CFR Part 990. AH is required to describe any differences between the LAMP and HUD's asset management requirements in its Annual MTW Plan in order to facilitate the recording of actual property costs and submission of such information to HUD:

1. AH implemented a fee-for-service system that was more comprehensive than HUD's asset management system. HUD's system was limited in focusing only on a fee-for-service system at the property level and failed to address AH's comprehensive operation that includes other program and business activities. AH's MTW Program is much broader than Public Housing properties and includes activities not found in traditional HUD Programs. This LAMP addresses the entire AH operation.
2. AH defined its cost objectives at a different level than HUD's asset management system. Specifically, AH defined the MTW Program as a cost objective that is consistent with the issuance of the CFDA number. HUD defined its cost objective at the property level, which fails to recognize the overall effort required to deliver the housing resources to low-income families under the MTW Program. Because the cost objectives are defined differently, direct and indirect costs are defined based on the cost objectives identified under this LAMP.

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## **Appendix E: Other Additional Information**

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Lobbying Disclosure Forms

AH's CLC Schedule Comparison

Disposition/Demolition Applications

COVID-19 Waiver Utilization

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## Appendix E: LOBBYING Disclosure - Placeholder

### Certification of Payments to Influence Federal Transactions

U.S. Department of Housing  
and Urban Development  
Office of Public and Indian Housing

Applicant Name

PHO Housing Authority of the City of Atlanta, Georgia

Program/Activity Receiving Federal Grant/Funding

Moving to Work Demonstration Program

The undersigned certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-L.L.L. Disclosure Form to Report Lobbying, in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by Section 1352, Title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

I hereby certify that all the information stated herein, as well as any information provided in the accompanying 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, 1014, 1342; 31 U.S.C. 3729, 3802)

Name of Authorized Official

Eugene Jones, Jr.

Title

President and Chief Executive Officer

Signature



Date (mm/dd/yyyy)

04/15/2020

Previous edition is obsolete

Form HUD 50071 (03/99)  
ref: handbooks 7417.1, 7475.10, 7485.1 & 7485.3

## ATLANTA HOUSNG CONSTRUCTION LIMIT COSTS (CLC) SCHEDULE

### HOUSING CONSTRUCTION COSTS (HCC) AND TOTAL DEVELOPMENT COST (TDC) LIMITS COMPARISON

Structure Type: Detached and Semi-Detached/HCC									
BR Size	HUD Limits						AH Limits	\$ Diff.	% Change
	2016	2017	2018	2019	2020	Avg. %			
0	\$ 79,661	\$ 80,216	\$ 84,459	\$ 87,936	\$ 88,964	2.3%	\$ 142,240	\$ 53,276	59.9%
1	\$ 104,245	\$ 104,885	\$ 109,198	\$ 113,813	\$ 115,108	2.0%	\$ 176,676	\$ 61,568	53.5%
2	\$ 126,432	\$ 127,177	\$ 130,631	\$ 136,214	\$ 137,727	1.7%	\$ 201,001	\$ 63,274	45.9%
3	\$ 154,565	\$ 155,287	\$ 155,737	\$ 162,445	\$ 164,214	1.2%	\$ 217,378	\$ 53,164	32.4%
4	\$ 181,869	\$ 182,649	\$ 183,165	\$ 191,462	\$ 193,500	1.3%	\$ 257,717	\$ 64,217	33.2%
5	\$ 198,663	\$ 199,437	\$ 200,592	\$ 209,884	\$ 212,123	1.3%	\$ 286,615	\$ 74,492	35.1%
6	\$ 213,558	\$ 214,380	\$ 216,968	\$ 227,172	\$ 229,617	1.5%	\$ 318,880	\$ 89,263	38.9%

Structure Type: Detached and Semi-Detached/TDC									
BR Size	HUD Limits						AH Limits	\$ Diff.	% Change
	2016	2017	2018	2019	2020	Avg. %			
0	\$ 139,407	\$ 140,378	\$ 147,803	\$ 153,887	\$ 155,687	2.3%	\$ 248,918	\$ 93,231	59.9%
1	\$ 182,430	\$ 183,548	\$ 191,097	\$ 199,173	\$ 201,438	2.0%	\$ 309,168	\$ 107,730	53.5%
2	\$ 221,255	\$ 222,560	\$ 228,604	\$ 238,374	\$ 241,022	1.7%	\$ 351,757	\$ 110,735	45.9%
3	\$ 270,488	\$ 271,753	\$ 272,539	\$ 284,279	\$ 287,374	1.2%	\$ 380,413	\$ 93,039	32.4%
4	\$ 318,270	\$ 319,636	\$ 320,539	\$ 335,059	\$ 338,625	1.3%	\$ 451,008	\$ 112,383	33.2%
5	\$ 347,661	\$ 349,014	\$ 351,035	\$ 367,297	\$ 371,216	1.3%	\$ 501,577	\$ 130,361	35.1%
6	\$ 373,727	\$ 375,165	\$ 379,694	\$ 397,551	\$ 401,830	1.5%	\$ 558,038	\$ 156,208	38.9%

Structure Type: Row House/HCC									
BR Size	HUD Limits						AH Limits	\$ Diff.	% Change
	2016	2017	2018	2019	2020	Avg. %			
0	\$ 74,818	\$ 73,745	\$ 74,611	\$ 75,453	\$ 76,481	0.4%	\$ 85,392	\$ 8,911	11.7%
1	\$ 98,090	\$ 96,478	\$ 97,472	\$ 98,594	\$ 99,888	0.4%	\$ 109,534	\$ 9,646	9.7%
2	\$ 119,310	\$ 117,196	\$ 118,200	\$ 119,547	\$ 121,060	0.3%	\$ 130,467	\$ 9,407	7.8%
3	\$ 146,673	\$ 143,651	\$ 144,458	\$ 146,027	\$ 147,796	0.2%	\$ 153,946	\$ 6,150	4.2%
4	\$ 174,150	\$ 170,327	\$ 171,389	\$ 173,289	\$ 175,158	0.1%	\$ 180,770	\$ 5,612	3.2%
5	\$ 191,858	\$ 187,451	\$ 188,579	\$ 190,645	\$ 192,884	0.1%	\$ 198,655	\$ 5,771	3.0%
6	\$ 208,399	\$ 203,455	\$ 204,720	\$ 206,890	\$ 209,335	0.1%	\$ 214,687	\$ 5,352	2.6%

Structure Type: Row House/TDC									
BR Size	HUD Limits						AH Limits	\$ Diff.	% Change
	2016	2017	2018	2019	2020	Avg. %			
0	\$ 130,931	\$ 129,053	\$ 130,569	\$ 132,042	\$ 133,842	0.4%	\$ 149,441	\$ 15,599	11.7%
1	\$ 171,658	\$ 168,837	\$ 170,576	\$ 172,539	\$ 174,804	0.4%	\$ 191,681	\$ 16,877	9.7%
2	\$ 208,792	\$ 205,093	\$ 206,849	\$ 209,207	\$ 211,854	0.3%	\$ 228,313	\$ 16,459	7.8%
3	\$ 256,678	\$ 251,390	\$ 252,801	\$ 255,548	\$ 258,642	0.2%	\$ 269,397	\$ 10,755	4.2%
4	\$ 304,763	\$ 298,072	\$ 299,931	\$ 303,256	\$ 306,526	0.1%	\$ 316,342	\$ 9,816	3.2%
5	\$ 335,751	\$ 328,039	\$ 330,013	\$ 333,628	\$ 337,547	0.1%	\$ 347,649	\$ 10,102	3.0%
6	\$ 364,698	\$ 356,046	\$ 358,260	\$ 362,057	\$ 366,335	0.1%	\$ 375,695	\$ 9,360	2.6%

## ATLANTA HOUSNG CONSTRUCTION LIMIT COSTS (CLC) SCHEDULE

### HOUSING CONSTRUCTION COSTS (HCC) AND TOTAL DEVELOPMENT COST (TDC) LIMITS COMPARISON

Structure Type: Walkup/HCC									
BR Size	HUD Limits						AH Limits	\$ Diff.	% Change
	2016	2017	2018	2019	2020	Avg. %			
0	\$ 62,210	\$ 64,063	\$ 65,345	\$ 66,108	\$ 68,371	1.9%	\$ 103,024	\$ 34,653	50.7%
1	\$ 85,931	\$ 88,549	\$ 89,145	\$ 90,214	\$ 93,148	1.6%	\$ 133,348	\$ 40,200	43.2%
2	\$ 108,986	\$ 112,384	\$ 112,769	\$ 114,143	\$ 117,838	1.6%	\$ 167,082	\$ 49,244	41.8%
3	\$ 142,319	\$ 146,913	\$ 148,520	\$ 150,351	\$ 155,170	1.8%	\$ 227,042	\$ 71,872	46.3%
4	\$ 177,341	\$ 183,096	\$ 184,027	\$ 186,316	\$ 192,137	1.6%	\$ 274,550	\$ 82,413	42.9%
5	\$ 199,606	\$ 206,157	\$ 207,337	\$ 209,932	\$ 216,376	1.6%	\$ 309,809	\$ 93,433	43.2%
6	\$ 221,540	\$ 228,895	\$ 230,360	\$ 233,259	\$ 240,290	1.6%	\$ 344,787	\$ 104,497	43.5%

Structure Type: Walkup/TDC									
BR Size	HUD Limits						AH Limits	\$ Diff.	% Change
	2016	2017	2018	2019	2020	Avg. %			
0	\$ 108,868	\$ 112,110	\$ 114,354	\$ 115,690	\$ 119,649	1.9%	\$ 180,286	\$ 60,637	50.7%
1	\$ 150,379	\$ 154,960	\$ 156,004	\$ 157,874	\$ 163,008	1.6%	\$ 233,354	\$ 70,346	43.2%
2	\$ 190,725	\$ 196,671	\$ 197,346	\$ 199,750	\$ 206,217	1.6%	\$ 292,400	\$ 86,183	41.8%
3	\$ 249,057	\$ 257,098	\$ 259,909	\$ 263,115	\$ 271,547	1.8%	\$ 397,328	\$ 125,781	46.3%
4	\$ 310,346	\$ 320,417	\$ 322,047	\$ 326,053	\$ 336,239	1.6%	\$ 480,461	\$ 144,222	42.9%
5	\$ 349,310	\$ 360,775	\$ 362,840	\$ 367,381	\$ 378,657	1.6%	\$ 542,162	\$ 163,505	43.2%
6	\$ 387,694	\$ 400,566	\$ 403,129	\$ 408,204	\$ 420,507	1.6%	\$ 603,379	\$ 182,872	43.5%

Structure Type: Elevator/HCC									
BR Size	HUD Limits						AH Limits	\$ Diff.	% Change
	2016	2017	2018	2019	2020	Avg. %			
0	\$ 70,490	\$ 71,486	\$ 72,190	\$ 74,975	\$ 75,835	1.5%	\$ 105,443	\$ 29,608	39.0%
1	\$ 98,686	\$ 100,081	\$ 101,066	\$ 104,965	\$ 106,170	1.5%	\$ 147,626	\$ 41,456	39.0%
2	\$ 126,881	\$ 128,675	\$ 129,942	\$ 134,954	\$ 136,504	1.5%	\$ 189,809	\$ 53,305	39.1%
3	\$ 169,175	\$ 171,567	\$ 173,256	\$ 179,939	\$ 182,005	1.5%	\$ 253,075	\$ 71,070	39.0%
4	\$ 211,469	\$ 214,459	\$ 216,570	\$ 224,924	\$ 227,506	1.5%	\$ 316,340	\$ 88,834	39.0%
5	\$ 239,665	\$ 243,054	\$ 245,446	\$ 254,914	\$ 257,841	1.5%	\$ 358,524	\$ 100,683	39.0%
6	\$ 267,861	\$ 271,648	\$ 274,322	\$ 284,904	\$ 288,175	1.5%	\$ 400,701	\$ 112,526	39.0%

Structure Type: Elevator/TDC									
BR Size	HUD Limits						AH Limits	\$ Diff.	% Change
	2016	2017	2018	2019	2020	Avg. %			
0	\$ 112,784	\$ 114,378	\$ 115,504	\$ 119,960	\$ 121,337	1.5%	\$ 168,715	\$ 47,378	39.0%
1	\$ 157,897	\$ 160,129	\$ 161,705	\$ 167,943	\$ 169,871	1.5%	\$ 236,199	\$ 66,328	39.0%
2	\$ 203,010	\$ 205,881	\$ 207,907	\$ 215,927	\$ 218,406	1.5%	\$ 303,690	\$ 85,284	39.0%
3	\$ 270,681	\$ 274,508	\$ 277,209	\$ 287,903	\$ 291,208	1.5%	\$ 404,914	\$ 113,706	39.0%
4	\$ 338,351	\$ 343,134	\$ 346,512	\$ 359,879	\$ 364,010	1.5%	\$ 506,143	\$ 142,133	39.0%
5	\$ 383,464	\$ 388,886	\$ 392,713	\$ 407,862	\$ 412,545	1.5%	\$ 573,634	\$ 161,089	39.0%
6	\$ 428,578	\$ 434,637	\$ 438,915	\$ 455,846	\$ 461,080	1.5%	\$ 641,119	\$ 180,039	39.0%

## PLANNED SPECIAL APPLICATIONS CENTER (SAC) SUBMISSIONS

Period	Property	Action
FY 2018 (carryover)	Jonesboro South	Disposition
FY 2021 (carryover)	Ashley Scholars Landing Phase II	Disposition
FY 2021 (carryover)	Englewood IA	Disposition
FY 2021 (carryover)	Englewood IB	Disposition
FY 2021 (carryover)	Englewood Storm Water	Disposition
FY 2021 (carryover)	Harmony at Bakers Ferry	Disposition
FY 2021 (carryover)	Heritage Village at West Lake	Disposition
FY 2021 (carryover)	Magnolia Perimeter ANDP	Disposition
FY 2021 (carryover)	Magnolia Perimeter City Place	Disposition
FY 2021 (carryover)	Magnolia Perimeter Quest/WFF	Disposition
FY 2021 (carryover)	Mechanicsville	Disposition
FY 2021 (carryover)	Quarry Park/Johnson Rd	Demolition
FY 2021 (carryover)	West Highlands	Disposition
FY 2022	Bankhead Courts	Disposition
FY 2022	North Avenue	Disposition

OVERVIEW: AH UTILIZED COVID-19 WAIVERS

Line #	Item	Statutory and Regulatory Applicability	Summary of Waiver/Alternative	Adoption Date
1	PH and HCV-1 PHA 5-Year and Annual Plan	<u>Statutory Authority</u> Section 5A(a)(1), Section 5A(b)(1), Section 5A(g), Section 5A(h)  <u>Regulatory Authority</u> § 903.5(a)(3), 903.5(b)(3), 903.21	<ul style="list-style-type: none"> <li>Alternative dates for submission</li> <li>Changes to significant amendment process</li> </ul>	April 24, 2020
2	PH and HCV-2 Family income and composition – delayed annual reexaminations	<u>Statutory Authority</u> Section 3(a)(1)  <u>Regulatory Authority</u> § 982.516(a)(1), § 960.257(a)	<ul style="list-style-type: none"> <li>Permits the PHA to delay the annual reexamination of income and family composition</li> <li>HCV PHAs must implement HCV-7 for impacted families if they implement this waiver</li> </ul>	March 30, 2020
3	PH and HCV-3 Annual reexamination Income Verification	<u>Regulatory Authority</u> § 5.233(a)(2)  <u>Sub-regulatory Guidance</u> PIH Notice 2018-18	<ul style="list-style-type: none"> <li>Waives the requirements to use the income hierarchy, including the use of EIV, and will allow PHAs to consider self-certification as the highest form of income verification</li> <li>PHAs that implement this waiver will be responsible for addressing material income discrepancies that may arise later</li> </ul>	March 23, 2020
4	PH and HCV-4 Interim reexaminations	<u>Statutory Authority</u> Section 3(a)(1)  <u>Regulatory Authority</u> § 5.233(a)(2), 982.516(c)(2), 960.257(b) and (d)  <u>Sub-regulatory Guidance</u> PIH Notice 2018-18	<ul style="list-style-type: none"> <li>Waives the requirement to use the income verification requirements, including the use of EIV, for interim reexaminations</li> </ul>	March 23, 2020
8	HQS-1 Initial inspection	<u>Statutory Authority</u> Section 8(o)(8)(A)(i), Section 8(o)(8)(C)  <u>Regulatory Authority</u> § 982.305(a), 982.305(b), 982.405	<ul style="list-style-type: none"> <li>Changes initial inspection requirements, allowing for owner certification that there are no life-threatening deficiencies</li> <li>Where self-certification was used, PHA must inspect the unit no later than October 31, 2020.</li> </ul>	March 23, 2020

## Appendix E: COVID-19 Waiver Utilization

Line #	Item	Statutory and Regulatory Applicability	Summary of Waiver/Alternative	Adoption Date
10	HQS-3 Non-Life Threatening HQS - Initial Unit Approval	<u>Statutory Authority</u> Section 8(o)(8)(A)(ii)  <u>Regulatory Authority</u> HOTMA HCV Federal Register Notice January 18, 2017	<ul style="list-style-type: none"> <li>Allows for extension of up to 30 days for owner repairs of non-life threatening conditions</li> </ul>	March 30, 2020
11	HQS-4 Initial HQS - Alternative Inspections	<u>Statutory Authority</u> Section 8(o)(8)(A)(iii)  <u>Regulatory Authority</u> HOTMA HCV Federal Register Notice January 18, 2017	<ul style="list-style-type: none"> <li>Under Initial HQS Alternative Inspection Option - allows for commencement of assistance payments based on owner certification there are no life-threatening deficiencies</li> <li>Where self-certification was used, PHA must inspect the unit no later than October 31, 2020.</li> </ul>	March 23, 2020
12	HQS-5 Biennial Inspections	<u>Statutory Authority</u> Section 8(o)(D)  <u>Regulatory Authority</u> §§ 982.405(a), 983.103(d)	<ul style="list-style-type: none"> <li>Allows for delay in biennial inspections</li> <li>All delayed biennial inspections must be completed as soon as reasonably possible but by no later than October 31, 2020.</li> </ul>	March 30, 2020
13	HQS-6 Interim Inspections	<u>Statutory Authority</u> Section 8(o)(8)(F)  <u>Regulatory Authority</u> §§ 982.405(g), § 983.103(e)	<ul style="list-style-type: none"> <li>Waives the requirement for the PHA to conduct interim inspection and requires alternative method</li> <li>Allows for repairs to be verified by alternative methods</li> </ul>	April 20, 2020
16	HQS-9 HQS QC Inspections	<u>Regulatory Authority</u> § 982.405(b)	<ul style="list-style-type: none"> <li>Provides for a suspension of the requirement for QC sampling inspections</li> </ul>	March 23, 2020
20	HCV-2 PHA Oral Briefing	<u>Regulatory Authority</u> § 982.301(a)(3) § 983.252(a)	<ul style="list-style-type: none"> <li>Waives the requirement for an oral briefing</li> <li>Provides for alternative methods to conduct required voucher briefing</li> </ul>	March 16, 2020

## Appendix E: COVID-19 Waiver Utilization

Line #	Item	Statutory and Regulatory Applicability	Summary of Waiver/Alternative	Adoption Date
21	HCV-3 Term of Voucher -Extensions of Term	<u>Regulatory Authority</u> § 982.303(b)(1)	<ul style="list-style-type: none"> <li>Allows PHAs to provide voucher extensions regardless of current PHA policy</li> </ul>	March 16, 2020
23	HCV-5 Absence from unit	<u>Regulatory Authority</u> § 982.312	<ul style="list-style-type: none"> <li>Allows for PHA discretion on absences from units longer than 180 days</li> <li>PHAs must not make HAP payments beyond 12/31/20 for units vacant more than 180 consecutive days</li> </ul>	May 1, 2020
24	HCV-6 Automatic Termination of the HAP Contract	<u>Regulatory Authority</u> § 982.455	<ul style="list-style-type: none"> <li>Allows PHA to extend the period of time after the last HAP payment is made before the HAP contract terminates automatically.</li> </ul>	March 13, 2020
25	HCV-7 Increase in Payment Standard	<u>Regulatory Authority</u> § 982.505(c)(4)	<ul style="list-style-type: none"> <li>Provides PHAs with the option to increase the payment standard for the family at any time after the effective date of the increase, rather than waiting for the next regular reexamination to do so.</li> </ul>	May 1, 2020
26	HCV-8 Utility Allowance Schedule	<u>Regulatory Authority</u> § 982.517	<ul style="list-style-type: none"> <li>Provides for delay in updating utility allowance schedule</li> </ul>	July 1, 2020
28	HCV-10 FUP	<u>Statutory Authority</u> Section 8(x)(2)	<ul style="list-style-type: none"> <li>Allows PHAs to increase age to 26 for foster youth initial lease up</li> </ul>	April 20, 2020
30	PH-2 Total Development Costs	<u>Regulatory Authority</u> § 905.314(c)	<ul style="list-style-type: none"> <li>Waives the TDC and HCC limits permitting approval of amounts in excess of published TDC by 25% to 50% on a case by case basis</li> </ul>	
37	PH-9 Utility Allowance	<u>Regulatory Authority</u> § 965.507	<ul style="list-style-type: none"> <li>Provides for delay in updating utility allowance schedule</li> </ul>	July 1, 2020
42	12a Form HUD 50058	<u>Regulatory Authority</u> 24 CFR Part 908, § 982.158  <u>Sub-regulatory Guidance</u> PIH Notice 2011-65	<ul style="list-style-type: none"> <li>Waives the requirement to submit 50058 within 60 days</li> <li>Alternative requirement to submit within 90 days of the effective date of action</li> </ul>	April 20, 2020