



# MTW

MOVING TO WORK  
ANNUAL PLAN

# FINAL

# FY 2023

**Public Comment Period**  
**February 9 – March 11, 2022**

Board Approval: March 23, 2022  
HUD Submission: April 13, 2022  
HUD Resubmission: July 15, 2022  
HUD Approval: July 26, 2022

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# AH Leadership

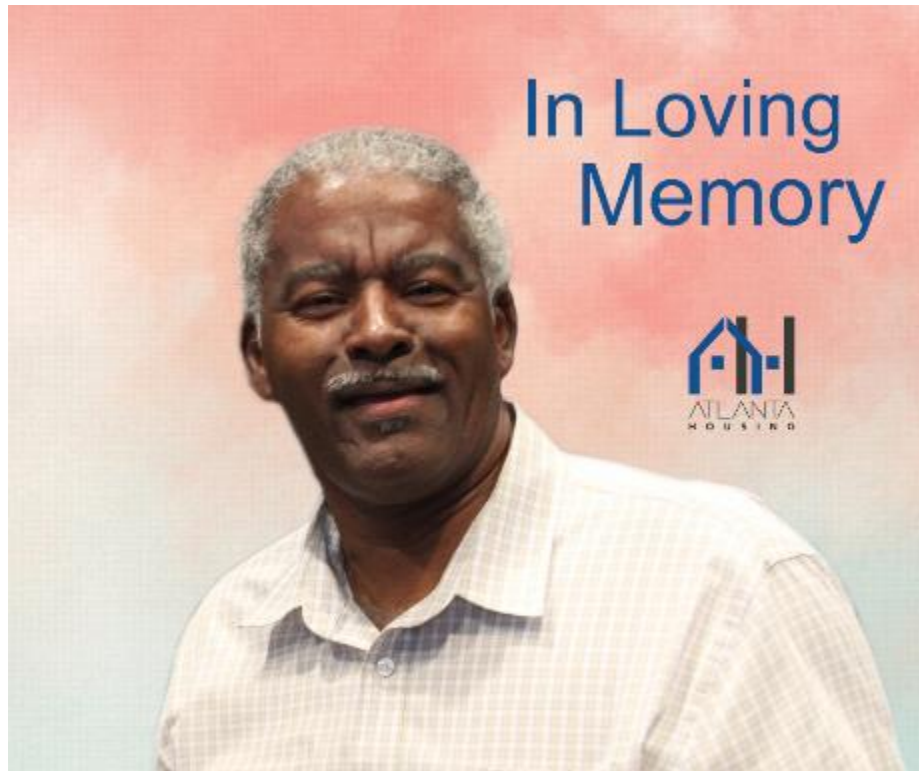
## *Moving-to-Work Since 2003*

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## **In Memory of Our Colleague and Friend, Joe Braxton**

Our dear colleague and friend, Joseph “Joe” Braxton, was an 11-year employee of Atlanta Housing, who served as our Client Technologies Tech.

Loved by his colleagues, Joe is remembered as a fun-loving and kind spirit, who was never too busy to share a positive word. He was always uplifting and willing to be helpful. Joe was a former Marine, a fierce Raiders fan and avid chess player, and he believed in living life in the fast (car) lane. Also, not one to be selfish, he shared his dream of one day winning the lottery with all who were willing to chip in for the possible winning ticket.

Joe retired in February 2020, and while we did not get the opportunity to bid Joe Braxton a proper retirement farewell due to the pandemic, we take this opportunity to show our love and gratitude for the incredible person, friend, and colleague known as “Brother Joe” whom we will forever remember.

# I. INTRODUCTION

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## A. Overview

### About Atlanta Housing

The Housing Authority of the City of Atlanta, Georgia, also referred to as Atlanta Housing (AH), provides rental assistance to low-income families across the city of Atlanta. AH's portfolio includes the following properties and programs:

- **AH-owned communities:** 9 public housing sites (including 7 for elderly and disabled residents)
- **Mixed communities:** communities that are ground leased on AH-owned land and mixed-income developments in which AH has an ownership interest, investment, or subsidy agreement
- **RAD PBV communities:** former public housing communities converted to project-based voucher (PBV) assisted communities under HUD's Rental Assistance Demonstration (RAD) Program
- **HomeFlex:** AH's MTW project-based rental assistance program, which includes:
  - **Standard HomeFlex:** supports affordable units in AH-owned, mixed, or stand-alone privately owned multi-family communities; can be dedicated for older persons [near elderly (55+) and elderly (62+) residents]
  - **Supportive Housing (HAVEN):** housing for vulnerable and targeted population groups
- **Housing Choice Vouchers:** tenant-based rental assistance program
- **Down payment assistance:** a forgivable loan to help eligible first-time homebuyers purchase a home

### The Need for Affordable Housing in Atlanta

According to a 2021 study by Freddie Mac, Atlanta is now the fourth fastest growing metropolitan area in the country. Several factors have contributed this growth: its relative affordability and comfortable climate, its business friendly environment across many diverse industries, and its 57 colleges and universities, which attract companies eager to tap into the talents of highly skilled employees. Atlanta's rapid growth, combined with a variety of broader economic factors, has resulted in significantly increased housing costs. Rents in Atlanta grew by 22.1 percent between January 2021 and January 2022.<sup>1</sup>

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<sup>1</sup> Source: *Apartment List* Metro-Level Historic Estimates, <https://www.apartmentlist.com/research/category/data-rent-estimates>, shows \$1,277 for 2021 Q1 and \$1,559 for 2022 Q1.



## About Moving-to-Work

AH's participation in the Moving to Work (MTW) Demonstration Program<sup>2</sup> has been critical in AH's ability to respond effectively to the twin challenges of rapid growth and increasing market rents. AH received its MTW designation in 2003<sup>3</sup>. This designation allows AH to pursue local solutions to local challenges in the delivery of housing services by waiving certain Public Housing and Housing Choice Voucher Programs rules and regulations found in the United States Housing Act of 1937. Whenever AH plans to deploy MTW Authorizations or flexibilities to create MTW Activities AH must use the MTW Plan to inform the United States Department of Housing and Urban Development (HUD) of these regulatory and statutory program rules and regulations changes.

As an MTW public housing authority<sup>4</sup>, AH deploys its MTW Authorizations to combine program funds and waive certain program rules and regulations in pursuit of innovative solutions to local housing challenges. AH is required to meet the following **MTW Statutory Requirements**:

- Ensure **75 percent of households are very low-income**;
- Establish a **reasonable rent policy** that encourages employment and self-sufficiency;
- Continue to **assist substantially the same** total number of eligible low-income households;
- Continue to **assist a comparable mix** of households by family size; and
- **Meet Housing Quality Standard requirements**.

All MTW Activities must **align with at least one of the three** following **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; or
- **Increase housing choices** for low-income families.

In addition to the statutory objectives, AH asks three basic questions when proposing new initiatives or reviewing existing policies:

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

AH requires an affirmative answer to all three questions before moving forward with a new initiative.

New MTW Activities are set forth in Section III.

- AH does not plan to introduce any new MTW Activities in FY 2023
- AH does plan to introduce new MTW Activities in the future:
  - An MTW Activity to create its own locally responsive Total Development Cost Schedule.

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<sup>2</sup> The MTW Demonstration Program was created by the United States Congress (US Congress or Congress) in 1996 and is administered by the United States Department of Housing and Urban Development (HUD). The US Congress renews the MTW Demonstration Program periodically and Congress last extended the Program through June 20, 2028. AH executed its MTW Agreement with HUD on September 23, 2003.

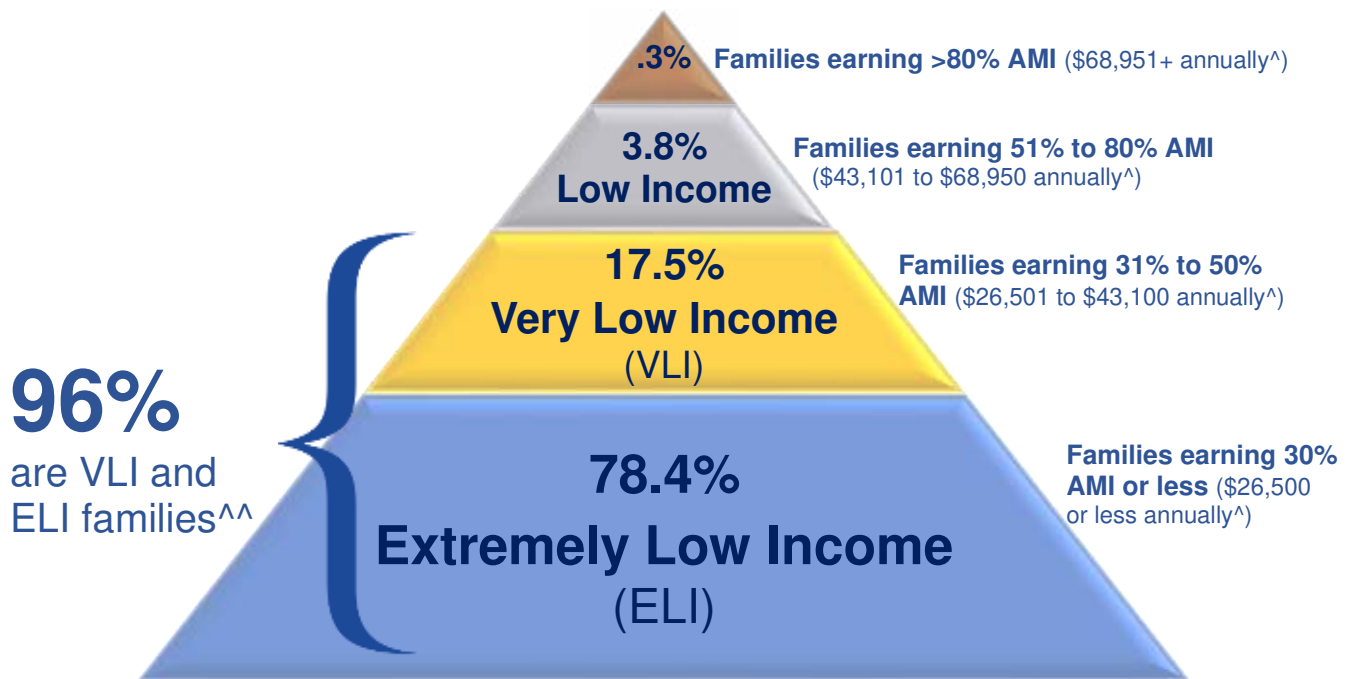
<sup>3</sup> There are 39 original MTW PHAs nationwide. Congress has since expanded the MTW Program and HUD admitted 41 new PHAs in 2021.

<sup>4</sup> There were 39 MTW PHAs prior to new legislation that adds 100 MTW cohorts. AH received its MTW designation in 2003.



## 2023 Program Projections

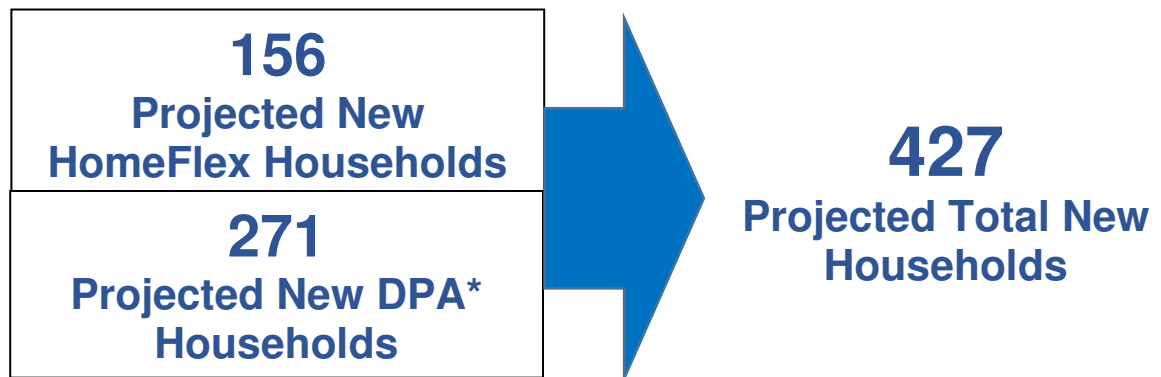
### Projected Households Served, by Income Category<sup>^</sup>



<sup>^</sup>Area Median Income (AMI) is the household income for the median – or middle – household in a region. HUD classifies families as high- or low-income based on AMI data that it publishes annually. This graph is based on HUD Income Limits from April 2021 for a Family of Four.

<sup>^^</sup>Source: Data Reporting and Analysis.

### Projected New Households



\*Down Payment Assistance

**26,934**  
Projected Total Households  
Served in FY 2023

## FY 2023 Priorities

AH's priorities for FY 2023 include: (1) creating and preserving affordable housing units, (2) enhancing existing rental assistance programs, (3) advancing economic mobility and the well-being of residents, and (4) improving operations to serve the community better. In addition, AH remains focused on increasing the number of households served over the previous year, which is the result of careful execution of these combined strategic priorities.

AH relies heavily on cooperation and collaboration with HUD, the City of Atlanta, governmental sister housing agencies, and private and non-profit partners in pursuit of the following priorities, goals, and objectives:

### Strategic Priority 1: Create and Preserve Housing Units

- **Create 725 new affordable housing units** through new construction, substantial rehabilitation, and significant modernization, the issuance of new tenant-based vouchers (TBVs), new HomeFlex Agreements, and new down payment assistance (DPA) awards.
- **Preserve 1,600 existing affordable housing units** through conversion of units under the Rental Assistance Demonstration (RAD) Program and the renewal of existing HomeFlex Agreements.
- **Assist in preserving 35 naturally affordable units** outside of AH's current portfolio across the City of Atlanta.

### Strategic Priority 2: Enhance Existing Programs

- **Enhance existing assistance programs** through the provision of emergency assistance, the creation of amenity-rich or transit connected communities, and the provision of homeownership assistance.

### Strategic Priority 3: Promote Economic Mobility and Resident Well-Being

- **Create opportunities for economic mobility and improved well-being** by supporting local agencies that specialize in providing education and workforce training, by investing in AH-assisted youth and college scholarship opportunities, and by expanding training and job opportunities in established and budding employment sectors.
- **Achieve or maintain a 65% work/program compliance rate** by assisting compliant families in maintaining employment, while assisting non-compliant families in returning to the workforce or helping working families meet the minimum hourly requirement<sup>5</sup>.

### Strategic Priority 4: Improve Administration

- **Improve operations** by meeting or exceeding HUD's new Section 3<sup>6</sup> requirements and reducing our carbon footprint.
- **Achieve or maintain a 90% voucher utilization rate** through the issuance and lease-up of TBVs, Special Purpose Vouchers, and the lease-up of HomeFlex Agreements.
- **Reduce operational costs** by streamlining assistance programs and delivering housing services more efficiently.
  - Engage in activities under Notice: PIH-2011-45 (HA) for housing development.
  - Exercise elements under Notice: PIH-2016-05 (HA) for streamlining opportunities.
  - Support AH's deployment of its Over-Income Limit Policy pursuant to the Housing Opportunity Through Modernization Act (HOTMA) Section 103 requirements.
  - Deploy options under Notice: PIH-2017-20 (HA) for HOTMA – Housing Quality Standards (HQS) to bring units under HAP contract more quickly. The options include utilization of the non-life-threatening (NLT) provision and the Alternative Inspection provision.
  - As necessary, utilize AH's MTW flexibility to exceed program cap limits, percentage increases, project cap limits, and similar limitations outlined in HOTMA.

<sup>5</sup> AH requires work-able participants to be employed an average of 20 hours per week to meet program compliance.

<sup>6</sup> Pursuant to HUD Regulation 24 CFR part 75.

## Planned Goals and Objectives

This section summarizes existing activities that AH plans to administer, implement, or accomplish between July 1, 2022 and June 30, 2023).

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

Goals and objectives listed here continue focus on increasing and preserving affordable units in the city of Atlanta, assisting in the prevention of homelessness, administering rental assistance programs, and preparing AH-assisted households for life after rental assistance.

Details of AH's MTW Activities are listed in Section IV.A.: Implemented Activities of this document. The FY 2023 activities are organized based on their alignment with the agency's strategic priorities:

### CREATION AND PRESERVATION OF AFFORDABLE HOUSING

#### Create New Affordable Housing Units

- AH plans to close on various phases of 6 projects to create 298 projected new affordable housing units under AH's **Revitalization Program** including:
  - Englewood IA Multi-Family (100 projected affordable units)
  - Englewood IB Senior (80 projected affordable units)
  - Mechanicsville Homeownership (28 projected affordable homeownership units)
  - Scholar's Landing Homeownership (8 projected affordable homeownership units)
  - West Highlands (3B, WACS, 2000 Perry) (64 projected affordable homeownership units)
  - Magnolia Perimeter (18 projected affordable rental and homeownership units)
- AH plans to design a short-term Construction Loan Program under AH's **Gap Financing** MTW Activity in cooperation with the Urban Revitalization Demonstration Office.
  - AH may seek to amend this MTW Activity to seek authorization to size loans to the total number of affordable units within a development, rather than limiting it to the number of units receiving subsidy. AH anticipates that the modified activity would increase the number of affordable units created, while decreasing AH's long-term, recurring obligations.
- AH plans to provide 264 down payment assistance awards to eligible first time home buyers to create 264 new affordable housing opportunities under AH's **Comprehensive Homeownership Program**.
- AH plans to create 156 projected new affordable housing units under AH's **HomeFlex as a Strategic Tool** activity by entering into 11 new HomeFlex Agreements. Planned unit counts and projects include:
  - 6 units at 1055 Arden
  - 16 units at 1265 Lakewood
  - 8 units at 356 James P. Brawley Drive
  - 8 units at 588 and 592 Paines Avenue
  - 8 units at 687, 693 Dalvigney & 613 Echo Street
  - 8 units at Abbington at Ormewood Park
  - 25 units at Intrada Westside
  - 30 units at McAuley Park Phase I
  - 10 units at Stanton Park
  - 14 units at The Mallory
  - 23 units at Thrive Sweet Auburn
- AH plans to create seven (7) projected new affordable homeownership opportunities under AH's **Choice Down Payment Assistance (Choice DPA) Program** by providing Choice DPA awards to eligible first time homebuyers in the University Choice Neighborhoods (UCN) boundaries.



### **Preserve Existing Affordable Housing Units within AH's Portfolio**

- AH plans to preserve 1,097 existing affordable housing units within AH's portfolio by renewing 15 expiring HomeFlex Agreements under AH's **HomeFlex as a Strategic Tool** activity. Planned unit counts and projects include:
  - 134 units at Avalon Park: 53 Family and 81 Senior units
  - 16 units at Capitol Gateway II
  - 94 units at Columbia High Point Senior
  - 122 units at Columbia Residences at Martin Luther King, Jr.
  - 135 units at Columbia Senior at Edgewood
  - 76 units at Columbia Sylvan Hills: 37 Standard and 39 Supportive units
  - 39 units at Columbia Tower at Martin Luther King, Jr. Village
  - 100 units at Gateway at East Point
  - 152 units at Gates at Park Commons – Housing for Older Persons (55+)
  - 129 units at Gates at Park Commons – Housing for Seniors (62+)
  - 100 units at Renaissance at Park Place South

### **ENHANCE RENTAL ASSISTANCE PROGRAMS**

- AH plans to deploy flexibilities under AH's **Develop Alternate and Supportive Housing Resources** activity to assist low-income Atlantans experiencing or at risk of homelessness. Planned household counts and programs include:
  - Assisting up to 295 households through the administration of Home Again.
  - Assisting up to 202 households by deploying MTW flexibilities (as approved by HUD), to administer the Emergency Housing Voucher Program.
  - Special Purpose Vouchers (SPVs): administration and financial oversight of vouchers deploying MTW flexibilities and dedicated for specific use or targeted population groups, including:
    - 450 FLOW vouchers;
    - 100 Housing First Vouchers (HFVs);
    - 32 Integrated Care Permanent Supportive Housing (ICPSH) vouchers;
    - 73 Mainstream Five Vouchers;
    - 21 Rise II Vouchers
    - 100 Special Program Vouchers for Homeless Students (a.k.a. APS<sup>7</sup> Vouchers)
  - AH will monitor its voucher commitment for the FLOW initiative led by Partners for Home (PFH) that includes collaboration with City of Atlanta, Mercy Care, Grady Health Systems, and the United Way of Atlanta, to ensure optimum utilization and voucher performance.
  - AH will evaluate re-purposing underutilized vouchers to create or support housing opportunities for people at heightened risk for housing instability. Programs include:
    - Supporting the Integrated Care Permanent Supportive Housing (ICPSH) Program;
    - Supporting the Rise II Program, a pilot program with Partners for Home; and
    - Supporting the Special Purpose Voucher for Homeless Students (SPVHS).
- AH will implement the next elements of AH's Biennial Housing Quality Standard (HQS) Inspection Schedule under its **Enhanced Inspection Standards** MTW Activity and continue previously approve inspection methods:
  - Under AH's Biennial HQS Inspection Schedule, HomeFlex and Housing Choice units requires consecutive passing inspections (3 for HomeFlex and 2 for Housing Choice) before placing units on a biennial inspection schedule.
- AH may review and align activities under its **HomeFlex Site-Based On-Site Administration** MTW Activity. Some of those activities include:
  - AH retains the flexibility to project-base 100% assistance at communities owned directly or indirectly by AH without a competitive procurement process pursuant to its MTW agreement.

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<sup>7</sup> Atlanta Public Schools.

- AH will resume regular, periodic training opportunities and business process reviews (BPRs) for property-manager developers (PMDs) and housing partners at all assisted communities.
- Deploy flexibilities under **Rent Simplification/AH Standard Deduction** to minimize calculation errors and reduce paperwork in order to improve and shorten the lease-up process.
- Use **Leasing Incentive Fees (LIFs)** to attract, recruit, and enroll Housing Choice partners, retain existing Housing Choice partners, and assist eligible low-income families with housing choices and move-in expenses.

## ECONOMIC MOBILITY AND RESIDENT WELL-BEING

### *Create Opportunities for Economic Mobility and Improved Well-Being*

- Deploy flexibilities under the **Good Neighbor Program II**, a program designed to prepare residents for living in areas of high opportunity, and require new Housing Choice residents to attend and complete the curriculum.
- Administer AH's Family Self-Sufficiency (FSS) Program under AH's **Human Development Services** activity and assist participating households in meeting program requirements by providing coaching or other resources based on their specific need.

### *Achieve or Maintain a 65% Work/Program Compliance Rate*

- Provide guidance and referral services for residents (age 18-61) subject to the **Work/Program Requirement**, to meet the 20-hour per week average minimum. Increase enforcement for non-compliant residents by increasing outreach and providing notice of non-compliance.
- Explore strategies to achieve and maintain a 65% compliance rate or about 6,500 target households employed at least 20 hours.
- Begin to review potential incentives for families that graduate Achieving Connectivity to Create Equity, and Self-Sufficiency (ACCESS), AH's program for creating higher-paying job opportunities in the technology sector.



## IMPROVE ADMINISTRATION

AH does not have short-term activities supporting this strategic priority that require MTW flexibilities.

### NEW MTW ACTIVITIES

- AH will not submit any new proposed MTW Activities for approval in FY 2023.

### CURRENT MTW ACTIVITIES

- Exercise elements of existing MTW Activities that permit AH to administer its rental assistance programs in concert with local issues and challenges unique to the City of Atlanta. Details of these activities are under Section IV.A. Implemented Activities.

### DATED MTW ACTIVITIES

- AH elects to close out dated activities, which are under Section IV.D. Closed Out Activities:
  - **HCV Housing Program Housing Assistance Payment Abatement Policy.** AH returned operations to the standard abatement policy as indicated under 24 CFR §983.208(b)(2).
  - **Aging-Well Program.** This activity does not require MTW Authorization.
  - **Veterans Supportive Housing.** Veterans Affairs Supportive Housing (VASH) vouchers can be project-based pursuant to Housing Opportunities Through Modernization Act of 2016<sup>8</sup>.

<sup>8</sup> [https://www.hud.gov/sites/dfiles/PIH/documents/HUD-VASH\\_PBV\\_Guidance.pdf](https://www.hud.gov/sites/dfiles/PIH/documents/HUD-VASH_PBV_Guidance.pdf) and PIH Notice 2017-21 provides additional consideration.

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

Goals and objectives listed here do not require MTW flexibility to administer.

### CREATION AND PRESERVATION OF AFFORDABLE HOUSING

#### *Create New Affordable Housing Units*

During FY 2023, AH will advance AH's real estate development pipeline, which may include investigating and consummating acquisition opportunities, reviewing homeownership components, and other significant activities to achieve housing development goals. Highlighted activities include:

- Collaboration with partners to develop real estate policies and design programs that position AH to maximize affordable housing opportunities;
  - Implement Notice PIH 2011-45 to create local, non-traditional (LNT) housing opportunities for low-income families by advancing co-investment projects:

#### Projected FY 2023 Financial Closings:

- Financially close on Heritage Village at West Lake (239 Westlake Avenue, NW) project, which is a 100% affordable co-investment project expected to deliver 102 affordable units.
- In partnership with Invest Atlanta, financially close on Sylvan Hills II project, which is a co-investment project expected to deliver 87 affordable units.
- In partnership with Invest Atlanta, financially close on Westside Square project, which is a co-investment project expected to deliver 44 affordable units.

#### FY 2023 Development Phase Projects

- Advance construction of Madison Reynoldstown, creating 116 new affordable units at completion.
  - Advance construction on Juanita Gardner project during FY 2023. AH submitted a disposition application to the Special Applications Center (SAC) for this 100% affordable co-investment project with Invest Atlanta that AH project to deliver 108 affordable units and projected to close in Quarter 2 2022.
  - Advance construction on Villas at Stone Hogan project, projected to deliver 190 affordable units. This is an affordable co-investment project with Invest Atlanta projected to close in Quarter 2 2022.
  - Advance construction on Flats at Stone Hogan project, projected to deliver 256 affordable units. This is an affordable co-investment project with Invest Atlanta projected to close in Quarter 2 2022.
  - Advance construction on Phoenix Ridge project, projected to deliver 396 affordable units. This is an affordable co-investment project with Invest Atlanta
  - Complete construction at London Townhomes (308 Scott Street), projected to deliver 180 affordable units upon completion.
- Implementation of AH's Homeownership Initiative Plan on various sites owned by AH. Proposed Homeownership sites include:
    - Englewood
    - Mechanicsville
    - Herndon
    - Scholar's Landing
    - Magnolia Perimeter
    - West Highlands
  - AH may begin infrastructure improvements on various sites necessary to implement planned revitalization activities. In addition to the homeownership sites listed above, possible infrastructure improvement projects may also include:
    - Civic Center
    - North Avenue



- In an effort to reduce its carbon footprint, AH may begin to incorporate AHGreen recommendations in the scope of new construction requests to meet environmental sustainability goals.
  - AH may include AHGreen requirements in substantial rehabilitation, and significant modernization contracts as well.
- AH plans to optimize its development strategy to prioritize the creation of affordable housing units in amenity-rich communities, or in proximity to quality schools or transit-connected neighborhoods.
- AH may submit Choice Neighborhoods grant applications for any of its Quality of Life Initiative sites, including but not limited to the following:
  - AH may submit a planning grant application for Thomasville Heights.
  - AH may submit implementation grant applications for Bowen Homes or other eligible projects, including Thomasville Heights.
- AH will submit appropriate disposition/demolition applications to the Special Application Center to properly dispose of or demolish structures on AH-owned property, as set forth in Appendix E.
  - AH will engage in activities to execute, renew, or update ground leases as necessary.
  - AH may seek to acquire parcels under its co-investment program that may require disposition terms including a long-term ground lease to the development partnership.
- AH will evaluate and pursue activities during the fiscal year to complement AH's goal to preserve affordable housing in the city of Atlanta:
  - Primary activities under consideration include positioning AH to acquire properties from HomeFlex partners that desire to sell their property and no longer participate in the HomeFlex Program.
  - Other activities may include working closely with property owners with expiring tax credits that position AH to provide assistance while gaining a significant ownership role.

### **Preserve Existing Affordable Housing Units**

- AH plans to convert 573 public housing units in 4 mixed-income communities to long-term Section 8 project-based voucher (PBV) assistance under the Rental Assistance Demonstration (RAD) Program. The projects scheduled for conversion include:
  - 282 units at Cosby Spear Highrise;
  - 149 units at East Lake Highrise;
  - 110 units at Villages at Carver I; and
  - 32 units at Westminster.
- AH may utilize elements of RAD Section 18 to partially or totally dispose of conversion projects and replace affected units with RAD PBV and non-RAD PBV units.
  - 110 units at Villages at Carver I
  - 114 units at Villages of Castleberry II
- AH will support the management of substantial rehabilitation or significant modernization projects at AH-Owned communities to meet RAD program requirements.
- AH plans to preserve 35 units of naturally affordable or expiring units not currently in AH's portfolio.
- AH plans to lease-up 67 units at Capitol View (1191 Metropolitan Parkway) under HomeFlex.
- AH will engage in activities to execute, renew, or update ground leases as necessary, including submitting appropriate applications to the Special Applications Center.



- AH plans evaluate and pursue activities during the fiscal year to complement AH's goal to preserve affordable housing in the City of Atlanta:
  - Primary activities under consideration include positioning AH to acquire properties from HomeFlex partners that desire to sell their property and no longer participate in the HomeFlex Program.
  - Other activities may include working closely with property owners with expiring tax credits that position AH to provide assistance while gaining a significant ownership role.
- AH will engage in activities to support Low-Income Housing Tax Credit applications submitted by development partners for planned projects.
  - AH may update AH's underwriting model to factor income averaging, "twinning"<sup>9</sup> of 4% and 9% tax credits, and other new issues/developments with 4% and 9% tax credit applications and requirements.
- AH plans to resume the Choice Heritage Program and preserve up to 6 units through an owner-occupied rehabilitation award<sup>10</sup> within the University Choice Neighborhoods (UCN) boundaries.
- AH will ensure right-to-return for former University Homes residents, oversee the operations of rehabilitated Roosevelt Hall, and update the UCN Implementation Grant Housing Plan, as needed.
- AH will continue implementation of the HUD-approved Critical Community Improvements (CCI) Plan. The CCI Plan includes expending available funding sources, acquisition of properties, providing rehabilitation assistance for low-income homeowners, and increasing or contributing to place-making enhancements throughout the UCN.
  - Place-making enhancements to improve UCN corridors may include planters, landscaping, artwork, streetscape and resurfacing, decorative bus stop shelters, etc.
- AH will manage and monitor the RAD Choice Mobility waiting list to ensure inclusion of RAD PBV families and priority issuance of turnover vouchers<sup>11</sup> to eligible RAD PBV families.



## ENHANCE RENTAL ASSISTANCE PROGRAMS

- AH will oversee the **administration of the tenant-based rental assistance programs** including TBVs inside and outside of the city of Atlanta:
  - Tenant-Based Vouchers: administration of 9,500 TBVs inside and outside of Atlanta;
  - Special Purpose Vouchers (SPVs): administration and financial oversight of non-MTW vouchers dedicated for specific use or households at heightened risk of homelessness:
    - 100 COVID Rapid Supportive Housing Program (CRSHP);
    - 300 Family Unification Program (FUP) vouchers;
    - 73 Mainstream Five Vouchers;
    - 175 Near-Elderly, Disabled (NED) (formerly Mainstream One) Vouchers;
    - 270 Veterans Affairs Supportive Housing (VASH) vouchers
- AH will inspect up to 100% of subsidized units at AH-Owned and Mixed-Income communities under HUD's Uniform Physical Condition Standards (UPCS) guidelines. In addition, AH will continue with adopted inspection methods associated with the National Standards for the Physical Inspection of Real Estate (NSPIRE) Demonstration Program under the Real Estate Assessment Center (REAC).
- AH plans to create and pilot a Single-Room Occupancy to evaluate program effectiveness and community acceptance.
- AH will work with and provide training opportunities to property manager-developers (PMDs).

<sup>9</sup> "Twinning" is AH's ability to combine 4% and 9% tax credits in the same project, which can allow for more tax credit equity.

<sup>10</sup> AH suspended in-person activities in response to COVID-19. AH plans to resume in-person projects pursuant to pandemic protocols.

<sup>11</sup> AH elected to use the alternative Choice Mobility option, which caps turnover vouchers to RAD PBV at three-quarters (75%).

- AH will continue to support the 16 remaining participants on the HCV Homeownership program and provide resources for 16 remaining homeownership vouchers.
  - AH plans to review its remaining HCV Homeownership clients to process the final elements of this program that AH no longer sponsors.
- AH will oversee the **administration of project-based rental assistance programs** including public housing units and project-based vouchers at AH-Owned and Mixed-Income Communities:
  - Public Housing: oversee the management of 2,823 units;
  - RAD Project-Based Vouchers (PBV): financial oversight of 1,340 former public housing units;
  - Local, Non-Traditional Housing: financial oversight of 2,669 LIHTC units; and
  - HomeFlex Housing: oversee the management of 6,362 existing vouchers at 116 communities.

## PROMOTE ECONOMIC MOBILITY AND RESIDENT WELL-BEING

- Administer HUD's EnVision Program to provide a range of educational and supportive services to AH-assisted families.
- Oversee the delivery of supportive services by University Choice Neighborhoods (UCN) case managers and service providers to connect participants to workforce development and employment opportunities.
- Pursue annual Family Self-Sufficiency (FSS) funding awards to support AH's Human Development Services (HDS) Program.
  - Increase program enrollment to support additional funding for another program coordinator.
- Review contracted resources that:
  - Provide employment related supportive services, including local and metro employment referrals, ongoing support, and job coaching to navigate job-related challenges; and assist residents with improving soft skills, training, and employment preparation or training.
  - Provide learning opportunities through workshops, after-school programming, and summer camps for children in AH-assisted households.
- Select up to 20 rising high school seniors, recent high school graduates, and new college students assisted by AH for participation in AH's Summer Internship Program to provide work experience and mentorship, and aid in professional development.
- Collectively, AH will create or facilitate opportunities for households to thrive:
  - Continue the "Building Blocks for Success" program, which supports the "People" element of AH's UCN Initiative. This program works closely with the four Atlanta Public Schools (APS) that serve the neighborhoods in the UCN boundaries.
  - Facilitate the coordination of access to literary resources in collaboration with Atlanta Book Rich Environments Program, the National Book Foundation, the Atlanta-Fulton County Library System, and others.
  - Maintain oversight of supportive services delivered by UCN case managers and service providers to connect participants to early childhood development, after-school, summer, and STEM/STEAM programming, college preparatory, and continuing education opportunities.
- Coordinate financial workshops on asset building, banking, budget development, credit, and other financial topics through groups and 1-on-1 coaching sessions under its 5-Star Tenant Program.
- Coordinate workshops focused on the wellbeing of AH-assisted families, especially activities that promote healthy living and stress management.
- Facilitate life skills training and support groups to generate referrals for partner agencies, such as Mercy Care, Fulton County Board of Health, and youth services providers.
- Coordinate onsite clinics to administer vaccinations, personal protective equipment and educational materials; maintain contact with AH-assisted families, especially families with no known relatives in the immediate area.
  - Track cases of COVID-19 exposure at AH-Owned communities.

- Facilitate housing for properly referred families through collaboration with PFH and utilizing HUD's Homeless Management Information System.
- Oversee the delivery of supportive services by UCN case managers and service providers to connect participants to coaching and counseling, health and wellness, and aging-in-place activities.
- Based on available funding, award 18 scholarships to college students from assisted households.
  - Market the Allen Community Scholars Award and the University Choice Neighborhoods Scholarship (UCNS) opportunities to approximately 2,600 college-aged youth (17-23 years old).
  - Market external scholarships offered by the Georgia Association of Housing and Redevelopment Authorities (GAHRA), the Housing Authority Insurance (HAI) Group, the Public Housing Authorities Directors Association (PHADA) and other non-AH opportunities to AH assisted households with eligible youth.

#### **Achieve or Maintain a 65% Work/Program Compliance Rate**

- Under AHGreen, the team will advance plans to offer green jobs training, and will increase community outreach.
  - Train Housing Quality Standard (HQS) Inspectors on energy and utility audits.
- AH will support the next cohorts of Achieving Connectivity to Create Equity, and Self-Sufficiency (ACCESS). ACCESS provides assistance with technical education and job placements through local and regional partnerships.
  - Recruit external partners to close the digital divide.
  - Research and monitor AH's ability to offer internet service, allowance, or similar to voucher holding families.

#### **IMPROVE ADMINISTRATION**

- AH will pursue federal, philanthropic, and other opportunities to secure bond funds, grant awards, tax credits, and other assistance, including Choice Neighborhood Implementation Grants, to create and preserve affordable housing units consistent with AH goals.
- AH will increase AH's diversity efforts in its contracting and human resources practices, including recruitment from AH's assisted population, while increasing outreach efforts to Atlanta's Hispanic and Latino populations, and recognizing companies that employ a workforce meeting Section 3 definitions.
  - AH will monitor Section 3 protocols to ensure proper implementation and enforcement.
- AH will continue to manage AH Cares to provide volunteer opportunities in the community for AH staff.
- AH will strengthen its digital footprint through training and the expansion of social media platforms to ensure program participants and partners are connected and informed.
- Under limited circumstances, AH anticipates an extension of COVID-19 Waivers by HUD that AH may elect to use in lieu of or in addition to MTW Waivers as approved/extended by HUD.

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

MTW Activities listed below reflect future innovations and initiatives that AH is vetting and may propose in a future MTW Plan for HUD's review and approval.

#### CREATION AND PRESERVATION

##### *Create New or Preserve Existing Affordable Housing Units*

- AH will explore the feasibility of a modular housing initiative and associated construction methods and techniques under its **Revitalization Program**. The initiative is consistent with AH's development strategy to create more affordable housing units.
  - AH may explore the creation of an investment vehicle for long-term development of affordable residential communities.
  - Such a program may include manufacturing homes, selling lots, and servicing mortgages.
- AH will explore the feasibility of adding commercial ventures under its **Revitalization Program** to create amenity-rich communities, as well as to adding to the housing stock. Pursuit of a commercial initiative falls within AH's development strategy to create more affordable housing units with access to amenities, while revitalizing communities.
- Pursue the issuance of short-term construction loans or similar funding products while continuing to collaborate with various agencies, organizations, or developers to innovate or advance public-private development projects under AH's **Gap Financing** activity. These initiatives are consistent with AH's development strategy to create more affordable housing units.
- Monitor the local economy and real estate market to modify the **Comprehensive Homeownership Program** to ensure policy alignment and assistance structure has long-term sustainability for the agency while creating new homeownership opportunities.
- Review the **HomeFlex Site-Based On-Site Administration** activity and training frequency to ensure policy alignment, contract administration, and enforcement elements are consistent with current agency priorities.
- Review the activity, **HomeFlex as a Strategic Tool**, to ensure policy alignment, contract administration, and incentive elements are consistent with AH's priority of creating and preserving affordable housing units in the City of Atlanta.
- Collect information to support AH's own **Total Development Cost (TDC) Schedule** to align with local urban development that permits AH to contribute to development projects at a higher level.

#### ENHANCE HOUSING ASSISTANCE PROGRAMS

- Monitor local housing demand among specific population groups to **Develop Alternate and Supportive Housing Resources** that assist AH in re-calibrating AH resources to provide housing stability for households experiencing or at-risk of homelessness, or those needing emergency assistance.
- Under supportive housing activities, AH will monitor and evaluate investments in local non-profits to ensure the attendance of referred individuals and households and the performance of services.



## PROMOTE ECONOMIC MOBILITY AND RESIDENT WELL-BEING

- Review performance of AH's **Work/Program Requirement** to determine effect on participants. Monitored metrics include:
  - Household earned income changes;
  - AH subsidy share or per unit costs changes and rent-roll or tenant share impact.
  - Household or individual job stabilization; and
  - Program compliance counts and rates.
- AH may research incentives to residents to increase resident employment and wage earnings, including assistance for training-related expenses, education, and employment.
  - Incentive concepts may include disregard of child support income, childcare and transportation assistance, GED testing reimbursement, purchase of work uniforms and tools, and other incentives to create a culture of learning and stable employment among assisted households.
- Begin consideration of an MTW Activity that extends program participation for AH-assisted "job-training" graduates to ensure stability before ending their program participation.
- Evaluate the performance and success of **Human Development Services** to ensure alignment between AH, service providers, and the needs and interests of residents.

## IMPROVE ADMINISTRATION

### *Improve Operations*

- Continue to review existing MTW Activities to identify obsolete activities caused by changes in strategic priorities or new or updated HUD guidance.
  - Reviews include identification of underperforming activities.
  - Identify MTW **activities that benefit assisted families, AH, and the communities** in the City of Atlanta.
- Continue to support of the MTW Program extension and expansion efforts.

### *Reduce Operational Costs*

- Monitor performance of **Utility Allowance (UA) Schedules** to determine if AH needs to deploy MTW Authorizations to serve participants and AH more efficiently and effectively.
  - Encourage program participants to seek energy efficient units;
  - Simplify UA Schedules to minimize calculation errors and reduce processing delays.
  - Monitor the ability to close the digital divide gap by pursuing Connect Home or similar initiatives to subsidize or credit internet access to assisted families.
- Review current operations to identify opportunities for improvement:
  - Evaluate agency initiatives for cost efficiency and effectiveness, such as:
    - Reducing AH's per unit cost;
    - Increasing revenue opportunities; or
    - Eliminating utility reimbursement payment (URP) scenarios.
      - Reduce zero-income families and negative rent scenarios, which are instances where AH "pays" residents to be program participants.
  - Evaluate incentives and "rewards" for working families with children, such as:
    - Disregarding child support income or other unearned income from the rent calculation formula.
    - Using a lower calculation percentage (less than 30%); or
    - Deploying a tiered rent schedule to help stabilize families.
  - Evaluate opportunities to increase housing choices, such as:
    - Giving participants the option to increase their share of rent from 30% to 40% (not to exceed 50%) to allow for greater choices in housing opportunities.



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

Activities listed below do not require deployment of MTW Authorizations to administer or implement. AH will continue to vet potential activities for inclusion in future MTW Plans that AH may propose as new MTW Activities. Highlighted MTW discussion topics in FY 2023 include:

### CREATION AND PRESERVATION

#### *Create New or Preserve Existing Affordable Housing Units*

- Assess the feasibility of activating a new Annual Contributions Contract for Public Housing (ACC/PH) units under HUD's Faircloth Limits and advance the process appropriate to add new PH units. AH can add up to 9,136 units<sup>12</sup>.
  - Analyze the cost-benefit of the Local Blended Subsidy tool to determine appropriateness for AH. AH will consider whether to create a pilot program prior to full implementation.
  - Consider issuance of Notice of Funding Availability (NOFA) to seek proposals for development projects using the ACC/PH funding strategy.
  - Prioritize development projects on AH vacant land.
- Monitor the strength of real estate and financial markets and AH's available funding levels in pursuit of private-public development partnerships or alternate development models to advance the following projects toward financial closings and construction:
  - Continue activities to advance the SoNo/301 project toward groundbreaking.
  - Continue activities to close on Herndon Family II (510 Cameron Madison Alexander Boulevard, NW) project.
  - Continue activities to advance the Herndon Family III project toward financial closing.
  - Continue activities to advance the Herndon Homeownership (510 Cameron Madison Alexander Boulevard, NW) project.
  - Continue activities to advance the Civic Center Northwest project toward financial closing.
- The properties listed below are subject to ongoing litigation and AH may dispose of these properties through ground lease or land sales to the development partner. Properties include vacant properties (either on-site or further leveraged properties) associated with the following sites: Capitol, Carver, Grady, and Harris.
- Finalize long-term real estate financial forecast to help identify capital needs.
  - Design a development plan for AH-owned land within the City of Atlanta;
  - Promote green infrastructure within new developments for residential and non-residential space. Increase the percentage of new AH-assisted units to achieve a 35% or higher level of green certification; and
  - Deploy the latest construction technology to increase affordable housing units.
- AH will evaluate strategies and techniques to position AH to engage in construction lending, asset ownership and management, and other self-development activities on AH-sponsored projects.
- AH will pursue alternative funding structures that permit AH to participate in HomeFlex projects under different roles to attract, create, or preserve affordable housing units.
  - Preliminary roles may include acting as a lender, loan servicer, or development partner before, during, or after the project.
- AH plans to review its affordable unit preservation strategy to complement AH's goals and objectives by:
  - Pursuing and scheduling project management to complete substantial rehabilitation or significant modernization of public housing under RAD.
  - Prioritizing remaining units with a HUD-approved Commitment to Enter into a Housing Assistance Payments (CHAP) Contract.
    - Identify subsidy-only conversions to accelerate the conversion process.

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<sup>12</sup> As of September 30, 2021.

- Evaluate long-term capital needs for AH-Owned facilities that AH may not convert under the RAD Program, and improve utility efficiency ratings.
  - Maximize energy and water efficiency in RAD conversions.
  - Encourage existing and future housing partners to improve water and energy efficiency at rentals.
- Re-assessing the conversion of public housing units to long-term Section 8 project-based voucher assisted units under the RAD Program.
- Analyzing options for the renewal of expiring HomeFlex Assistance Agreements to ensure agreements align with AH's long-term preservation goals.
  - Primary activities may include evaluating whether to position AH to acquire properties from HomeFlex partners that express an interest in terminating participation in the HomeFlex Program or selling their properties.
  - Other activities may include exploring how AH might work with owners of properties with expiring tax credits to position AH to provide assistance while gaining significant ownership role.
- AH will seek new and renewed sources of funding and partnerships to complement neighborhood revitalization projects, including:
  - Submitting applications for HUD Choice Neighborhoods Planning or Implementation Grants for eligible projects;
  - Executing master developer agreement and initiating building designs for projects.
  - Funding to support infrastructure and environmental sustainability; and community revitalization;
- AH will support community-oriented housing initiatives in alignment with its strategic priorities and those of its external partners. Adopt policies, procedures, and/or guidelines to address/meet program specific initiative requirements.

## **ENHANCE HOUSING ASSISTANCE**

### ***Enhance Housing Assistance Programs for Low-Income Atlantans***

- AH plans to advance development plans for affordable homeownership opportunities on AH-owned land utilizing fee-simple land sales or a land trust form of ownership to assure long-term affordability. Preliminary projects could include:
  - Bowen IVa;
  - Bowen VI;
  - Englewood IC Homeownership; and
  - Hollywood Courts Townhomes.

Land sales, construction, and homeownership closings may include reduced land value, an AH investment, or AH down payment assistance to support affordability. AH may also pursue long-term affordability through land dispositions, collaboration with land trusts, and similar activities.
- AH may assess the feasibility of developed and undeveloped parcels, particularly in areas of opportunity, for acquisition in order to preserve or increase the affordable housing stock and promote long-term affordability.
  - Acquisitions 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.
  - Acquisitions under AH's Co-Investment Program may require disposition terms under a long-term ground lease to the development partnership.
- AH plans to review and increase the number and frequency of training opportunities with property-manager developers (PMDs) and other housing partners on MTW policies.

## **PROMOTE ECONOMIC MOBILITY AND RESIDENT WELL-BEING**

### ***Create Opportunities for Economic Mobility and Improved Well-Being***

- AH will monitor investments in local non-profits to ensure referral attendance and program performance in order to measure the success of programs designed to assist AH participants.
  - Explore incentives or the creation of a Youth Leadership Program to complement Summer Internship Program.
  - Sponsor and support AH's Family Self-Sufficiency (FSS) Program, including an increase in program enrollment.

## **IMPROVE ADMINISTRATION**

### ***Improve Operations***

- AH will assess data collection methods to ensure the accurate measurement of the performance of MTW activities as AH continues to focus on creating opportunities for AH-assisted households.
  - Assessment may include the evaluation of software, establishing metrics, and analyzing data.
- AH plans to continue assessing the outcomes of the AHGreen Initiative to ensure commitments and performance are in alignment with its environmental sustainability strategies. Future concepts and strategies may include:
  - The coordination of resources towards reducing utility costs and improving energy efficiency;
  - Exploring the financial feasibility of attaching solar panels to AH-owned buildings; or
  - Utilizing “undevelopable” vacant parcels as urban solar farms.

### ***Reduce Operational Costs***

- AH will research efforts to increase sources of funding and revenue-generating opportunities, including:
  - Leasing vacant parcels and air space for community events and communication towers.

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## 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) FILL IN NAME AND NUMBER	0/1 BR s	2 BR s	3 BR s	4 BR s	5 BR s	6+ BR s	TOTAL UNITS	POPULATION TYPE	Section 504 Accessible Units (Mobility)	Section 504 Units (Hearing/ Visio)
Name/Number	0	0	0	0	0	0	0	Type (below)	0	0
Name/Number	0	0	0	0	0	0	0	Type (below)	0	0
Name/Number	0	0	0	0	0	0	0	Type (below)	0	0

<b>Total Public Housing Units to be Added in the Plan Year:</b>	<b>0</b>
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\* The federal accessibility standard under HUD's Section 504 regulation is the Uniform Federal Accessibility Standards (UFAS) for purposes of Section 504 compliance (24 CFR 8.32). HUD recipients may alternatively use the 2010 ADA Standards for Accessible Design under Title II of the ADA, except for certain specific identified provisions, as detailed in HUD's Notice on "Instructions for use of alternative accessibility standard," published in the Federal Register on May 23, 2014 ("Deeming Notice") for purposes of Section 504 compliance, <https://www.govinfo.gov/content/pkg/FR-2014-05-23/pdf/2014-11844.pdf>

\*\* 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 /GA006000241	282	PH units converted to PBV units under the RAD Program
East Lake Highrise /GA006000300	149	PH units converted to PBV units under the RAD Program
Westminster /GA006001110	32	PH units converted to PBV units under the RAD Program
Village at Carver (Phase I) /GA006000850	110	PH units converted to PBV units under the RAD Section 18
<b>TOTAL:</b> Public Housing Units to be Removed in the Plan Year	<b>573</b>	

### 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	6	No	PBV unit creation under AH's HomeFlex Supportive Housing Program (HAVEN).
1265 Lakewood	16	No	PBV unit creation under AH's HomeFlex Supportive Housing Program (HAVEN).
356 James P. Brawley Drive	8	No	PBV unit creation under AH's Standard HomeFlex Program.
588 & 592 Paines Avenue	8	No	PBV unit creation under AH's Standard HomeFlex Program.
687 & 693 Dalvigney and 613 Echo Street	8	No	PBV unit creation under AH's Standard HomeFlex Program.
Abbingtion at Ormewood Park	8	No	PBV unit creation under AH's HomeFlex Supportive Housing Program (HAVEN).
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 HomeFlex Supportive Housing Program (HAVEN).
McAuley Park (Phase I)	30	No	PBV unit creation under AH's HomeFlex Supportive Housing Program (HAVEN).
Stanton Park	10	No	PBV unit creation under AH's HomeFlex Supportive Housing Program (HAVEN).
The Mallory	14	No	PBV unit creation under AH's HomeFlex Supportive Housing Program (HAVEN).
Thrive Sweet Auburn	23	No	PBV unit creation under AH's HomeFlex Supportive Housing Program (HAVEN).
Village at Carver (Phase I)	110	Yes	PH units converted to PBV units under the RAD Section 18.
Westminster	32	Yes	PH units converted to PBV units under the RAD Program.
<b>TOTAL:</b> Planned new Project Based Units in Plan Year	<b>729</b>		

#### iv. 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. Select one of the following to indicate the \*\*Planned Status by the end of the Plan Year: "Committed," "Leased," or "Issued." In column three, indicate whether the unit is included in RAD.

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	PLANNED STATUS AT END OF PLAN YEAR*	RAD?	DESCRIPTION OF PROJECT
395 James P. Brawley Drive	20	Leased	No	PBV unit creation under AH's Standard HomeFlex Program.
507 English Avenue	6	Leased	No	PBV unit creation under AH's Standard HomeFlex Program.
55 Milton	18	Leased	No	PBV unit creation under AH's Standard HomeFlex Program.
Academy Lofts at Adair Park	5	Leased	No	PBV unit creation under AH's Standard HomeFlex Program.
Adamsville Green	35	Leased	No	PBV unit creation under AH's Standard HomeFlex Program.
Adamsville Green	46	Leased	No	PBV unit creation under AH's HomeFlex Supportive Housing Program (HAVEN).
Arcadia at Parkway Village	116	Leased	No	PBV unit creation under AH's Standard HomeFlex Program.
Ashley Auburn Pointe I	8	Leased	No	PBV unit creation under AH's Standard HomeFlex Program.
Ashley I at Scholars Landing	54	Leased	No	PBV unit creation under AH's Standard HomeFlex Program.
Ashton at Browns Mill	74	Leased	No	PBV unit creation under AH's Standard HomeFlex Program.
Ashton at Browns Mill	5	Leased	No	PBV unit creation under AH's HomeFlex Supportive Housing Program (HAVEN).
Atrium at CollegeTown	114	Leased	No	PBV unit creation under AH's Standard HomeFlex Program.
Auburn Glen	108	Leased	No	PBV unit creation under AH's Standard HomeFlex Program.
Avalon Park Family	53	Leased	No	PBV unit creation under AH's Standard HomeFlex Program.
Avalon Park Senior	136	Leased	No	PBV unit creation under AH's Standard HomeFlex Older Persons Program.
Avalon Ridge Family	89	Leased	No	PBV unit creation under AH's Standard HomeFlex Program.
Barge Road	129	Leased	Yes	PH unit conversion in AH-Owned Community to PBV units under RAD Program.
Brightstone at DeKalb Medical Parkway	175	Leased	No	PBV unit creation under AH's Standard HomeFlex Program.
Campbell Stone	236	Leased	No	PBV unit creation under AH's Standard HomeFlex Program.
Capitol Gateway II	16	Leased	No	PBV unit creation under AH's Standard HomeFlex Program.



PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	PLANNED STATUS AT END OF PLAN YEAR*	RAD?	DESCRIPTION OF PROJECT
Capitol View	43	Committed	No	PBV unit creation under AH's Standard HomeFlex Program.
Capitol View	24	Committed	No	PBV unit creation under AH's HomeFlex Supportive Housing (HAVEN) Program.
Centennial Place I	74	Leased	No	PBV unit creation under AH's Standard HomeFlex Program.
Centennial Place II	70	Leased	No	PBV unit creation under AH's Standard HomeFlex Program.
Centennial Place III	74	Leased	No	PBV unit creation under AH's Standard HomeFlex Program.
Centennial Place IV	83	Leased	No	PBV unit creation under AH's Standard HomeFlex Program.
Columbia Colony Senior	62	Leased	No	PBV unit creation under AH's Standard HomeFlex Older Persons Program.
Columbia Commons	15	Leased	No	PBV unit creation under AH's Standard HomeFlex Program.
Columbia Commons	48	Leased	Yes	PH units in Mixed Community to PBV units under RAD Program.
Columbia Creste	61	Committed	Yes	PH units in Mixed Community to PBV units under RAD Program.
Columbia Estates	50	Leased	Yes	PH units in Mixed Community to PBV units under RAD Program.
Columbia Grove	56	Committed	Yes	PH units in Mixed Community to PBV units under RAD Program.
Columbia Heritage	124	Leased	No	PBV unit creation under AH's Standard HomeFlex Program.
Columbia High Point (Senior)	94	Leased	No	PBV unit creation under AH's Standard HomeFlex Older Persons Program.
Columbia Mechanicsville Apartments	35	Leased	No	PBV unit creation under AH's Standard HomeFlex Program.
Columbia Mechanicsville Apartments	62	Leased	Yes	PH units in Mixed Community to PBV units under RAD Program.
Columbia Mechanicsville Parkside	32	Leased	No	PBV unit creation under AH's Standard HomeFlex Program.
Columbia Mechanicsville Parkside	47	Leased	Yes	PH units in Mixed Community to PBV units under RAD Program.
Columbia Park Citi Residences at West Highlands	61	Leased	Yes	PH units in Mixed Community to PBV units under RAD Program.
Columbia Senior Residences at Blackshear	78	Leased	No	PBV unit creation under AH's Standard HomeFlex Older Persons Program.
Columbia Senior Residences at Edgewood	135	Leased	No	PBV unit creation under AH's Standard HomeFlex Older Persons Program.

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	PLANNED STATUS AT END OF PLAN YEAR*	RAD?	DESCRIPTION OF PROJECT
Columbia Senior Residences at Martin Luther King, Jr.	122	Leased	No	PBV unit creation under AH's Standard HomeFlex Older Persons Program.
Columbia Senior Residences at Mechanicsville	81	Leased	No	PBV unit creation under AH's HomeFlex for Older Persons Program.
Columbia Senior Residences at Mechanicsville	54	Leased	Yes	PH units in Mixed Community to PBV units under RAD Program.
Columbia South River Gardens	51	Leased	No	PBV unit creation under AH's Standard HomeFlex Program.
Columbia Sylvan Hills	37	Leased	No	PBV unit creation under AH's Standard HomeFlex Program.
Columbia Sylvan Hills	39	Leased	No	PBV unit creation under AH's HomeFlex Supportive Housing Program (HAVEN).
Columbia Tower at Martin Luther King, Jr. Village	56	Leased	No	PBV unit creation under AH's Standard HomeFlex Program.
Columbia Tower at Martin Luther King, Jr. Village	39	Leased	No	PBV unit creation under AH's HomeFlex Supportive Housing Program (HAVEN).
Columbia Village	30	Leased	Yes	PH units in Mixed Community to PBV units under RAD Program.
Constitution Avenue Apartments	67	Leased	No	PBV unit creation under AH's Standard HomeFlex Program.
Covenant House Georgia	30	Leased	No	PBV unit creation under AH's HomeFlex Supportive Housing Program (HAVEN).
Dwell at Alcove	9	Leased	No	PBV unit creation under AH's HomeFlex Supportive Housing Program (HAVEN).
Gateway at Capitol View	162	Leased	No	PBV unit creation under AH's Standard HomeFlex Older Persons Program.
Gateway at East Point	100	Leased	No	PBV unit creation under AH's Standard HomeFlex Program.
GE Tower	189	Leased	No	PBV unit creation under AH's Standard HomeFlex Program.
Heritage Green	44	Leased	No	PBV unit creation under AH's Standard HomeFlex Program.
Heritage Station I	88	Leased	No	PBV unit creation under AH's Standard HomeFlex Program.
Heritage Station II	150	Leased	No	PBV unit creation under AH's Standard HomeFlex Program.
Herndon Square Senior	97	Leased	No	PBV unit creation under AH's Standard HomeFlex Older Persons Program.
Hightower Manor	129	Leased	Yes	PH unit conversion in AH-Owned Community to PBV units under RAD Program.

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	PLANNED STATUS AT END OF PLAN YEAR*	RAD?	DESCRIPTION OF PROJECT
Imperial Hotel	90	Leased	No	PBV unit creation under AH's HomeFlex Supportive Housing Program (HAVEN)
Lakewood at Christian Manor	199	Leased	No	PBV unit creation under AH's Standard HomeFlex Program.
Legacy at Vine City	105	Leased	No	PBV unit creation under AH's Standard HomeFlex Program.
Lillie R. Campbell House	64	Leased	No	PBV unit creation under AH's Standard HomeFlex Program.
London Townhomes	63	Committed	No	PBV unit creation under AH's Standard HomeFlex Program.
Manor at Indian Creek II	75	Leased	No	PBV unit creation under AH's Standard HomeFlex Older Persons Program.
Manor at Scott's Crossing	100	Leased	No	PBV unit creation under AH's Standard HomeFlex Older Persons Program.
Marietta Road Senior Tower	129	Leased	Yes	PH unit conversion in AH-Owned Community to PBV units under RAD Program.
Martin House at Adamsville	113	Leased	No	PBV unit creation under AH's Standard HomeFlex Program.
Mechanicsville Crossing	30	Leased	No	PBV unit creation under AH's Standard HomeFlex Program.
Mechanicsville Station	35	Leased	No	PBV unit creation under AH's Standard HomeFlex Program.
Oasis at Scholars Landing	60	Leased	No	PBV unit creation under AH's Standard HomeFlex Older Persons Program.
Odyssey at Villas	32	Leased	No	PBV unit creation under AH's HomeFlex Supportive Housing Program (HAVEN).
O'Hern House	76	Leased	No	PBV unit creation under AH's HomeFlex Supportive Housing Program (HAVEN).
Park Commons / Gates Park HFOP	130	Leased	No	PBV unit creation under AH's Standard HomeFlex Older Persons Program.
Park Commons / Gates Park HFOP	22	Leased	No	PBV unit creation under AH's HomeFlex Supportive Housing Program (HAVEN).
Park Commons / Gates Park HFS	110	Leased	No	PBV unit creation under AH's Standard HomeFlex Program.
Park Commons / Gates Park HFS	19	Leased	No	PBV unit creation under AH's HomeFlex Supportive Housing Program (HAVEN).
Peachtree Road Senior Tower	196	Leased	Yes	PH unit conversion in AH-Owned Community to PBV units under RAD Program.
Peaks at MLK	73	Leased	No	PBV unit creation under AH's Standard HomeFlex Program.

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	PLANNED STATUS AT END OF PLAN YEAR*	RAD?	DESCRIPTION OF PROJECT
Phoenix House	44	Leased	No	PBV unit creation under AH's HomeFlex Supportive Housing Program (HAVEN).
Piedmont Road Highrise	207	Leased	Yes	PH unit conversion in AH-Owned Community to PBV units under RAD Program.
Providence Parkway Village	50	Leased	No	PBV unit creation under AH's Standard HomeFlex Program.
Quest Village III	10	Leased	No	PBV unit creation under AH's HomeFlex Supportive Housing Program (HAVEN).
Retreat at Edgewood	40	Leased	No	PBV unit creation under AH's Standard HomeFlex Program
Reynoldstown Senior Residences	26	Leased	No	PBV unit creation under AH's Standard HomeFlex Older Persons Program.
Seven Courts	30	Leased	No	PBV unit creation under AH's HomeFlex Supportive Housing Program (HAVEN).
Spring View Apartments	24	Leased	No	PBV unit creation under AH's Standard HomeFlex Program.
Sterling at Candler Village	170	Leased	No	PBV unit creation under AH's Standard HomeFlex Program.
Summerdale Commons	50	Leased	No	PBV unit creation under AH's Standard HomeFlex Program.
Summit Trail	40	Leased	No	PBV unit creation under AH's HomeFlex Supportive Housing Program (HAVEN).
Tenth & Juniper Highrise	149	Leased	Yes	PH unit conversion in AH-Owned Community to PBV units under RAD Program.
The Legacy at Walton Lakes	24	Leased	No	PBV unit creation under AH's Standard HomeFlex Program.
The Remington Apartments	160	Leased	No	PBV unit creation under AH's Standard HomeFlex Program.
The Renaissance at Park South – Senior	100	Leased	No	PBV unit creation under AH's Standard HomeFlex Older Persons Program.
Veranda at Auburn Pointe	86	Leased	No	PBV unit creation under AH's Standard HomeFlex Program.
Veranda at Auburn Pointe II	98	Leased	No	PBV unit creation under AH's Standard HomeFlex Program.
Veranda at Auburn Pointe III	102	Leased	No	PBV unit creation under AH's Standard HomeFlex Program.
Veranda at Carver	90	Leased	No	PBV unit creation under AH's Standard HomeFlex Program.
Veranda at CollegeTown	100	Leased	No	PBV unit creation under AH's Standard HomeFlex Program.
Veranda at Groveway	74	Leased	No	PBV unit creation under AH's Standard HomeFlex Program.
Veranda at Scholars Landing	100	Leased	No	PBV unit creation under AH's Standard HomeFlex Program.

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	PLANNED STATUS AT END OF PLAN YEAR*	RAD?	DESCRIPTION OF PROJECT
Villages at Castleberry Hill I	66	Leased	Yes	PH unit conversion in Mixed Community to PBV units under RAD Program.
Villages at East Lake Redevelopment I & II	271	Leased	Yes	PH unit conversion in Mixed Community to PBV units under RAD Program.
Villas of H.O.P.E.	36	Leased	No	PBV unit creation under AH's HomeFlex Supportive Housing Program (HAVEN).
Welcome House	41	Leased	No	PBV unit creation under AH's HomeFlex Supportive Housing Program (HAVEN).
Woodbridge at Parkway Village	98	Leased	No	PBV unit creation under AH's Standard HomeFlex Program.
<b>Total:</b> Planned Existing Project-Based Vouchers	<b>8,352</b>			

**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.

PLANNED OTHER CHANGES TO MTW HOUSING STOCK ANTICIPATED IN THE PLAN YEAR
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 and the requirements of 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 \$6.49M for site and building improvements at six AH-Owned communities. Planned expenditures include vehicle/pedestrians gate, design/inspection services for balcony replacement, including demolition/replacement of 282 balconies, 86 thermostats, 10 PTAC units, 50 exhaust fans 50-5-CFM-27, exhaust fans for dryers in laundry room, and 120 showerhead replacements. Planned expenditures also include, repair main sewer line for C&D Building, installing cold water shut off valves, removing hot and cold water lines, fitness center upgrade, common area carpet and furniture replacement, elevator upgrades, paint exterior columns, replace fire system control panel, replace handles on common area doors to ADA levels, and window sill replacements.

In addition, planned capital expenditures include the replacement of gazebo & site furniture, roofs, HVAC-controller upgrade-sole source (proprietary), card reader/access control-elevators, asphalt pave, seal, and stripe parking lots.

As part of its planned capital expenditures during the Plan Year, AH may purchase fleet vehicles or invest in equipment to replace aging vehicles or equipment assigned to staff or designated as corporate 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 estimated capital expenditures per site:

- \$ 97,900 @ Cheshire Bridge Road Highrise
- \$4,055,730 @ Cosby Spear Highrise
- \$ 939,950 @ Georgia Avenue Highrise
- \$1,232,660 @ Marian Road Highrise
- \$ 74,250 @ Martin Street Plaza
- \$ 97,900 @ Westminster
- \$6,498,390 Planned Capital Expenditure Total\*

**\*Note:** Estimated expenditures may increase due to materials, labor, or other construction and/or market increases.

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## 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 HOUSEHOLD TO BE SERVED**
MTW Public Housing Units Leased	13,260	1,105
MTW Housing Choice Vouchers (HCV) Utilized	251,280	20,940
Local, Non-Traditional: Tenant-Based^	3,540	295
Local, Non-Traditional: Property-Based^	32,052	2,671
Local, Non-Traditional: Homeownership^	23,076	1,923
<b>Planned Total Households Served:</b>	<b>323,208</b>	<b>26,934</b>

\* "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.

^ 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*
<b>Tenant-Based</b>	Developing Alternative and Supportive Housing Resources/SH.2005.09	3,540	295
<b>Property-Based</b>	Reformulating the Subsidy Arrangement in AH's Affordable Communities/RE.2005.09	13,032	1,086
<b>Property-Based</b>	HomeFlex Site-Based Administration/RE.2006.02	19,020	1,585
<b>Homeownership</b>	Comprehensive Homeownership Program/RE.2007.03	23,076	1,923

\* 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.

<b>HOUSING PROGRAM</b>	<b>DESCRIPTION OF ANTICIPATED LEASING ISSUES AND POSSIBLE SOLUTIONS</b>
<b>MTW Public Housing</b>	AH will continue moratoriums on leasing activities at several of the AH-Owned communities in order to support “checkerboard” resident movement to complete planned rehabilitation projects. In addition, the COVID-19 pandemic may limit property management activities, including lease-ups and evictions. Leasing issue solutions may include exercising HUD-approved COVID-19 Waivers as guidance for AH contracted property managers. AH may also employ by-appointment, remote, and virtual strategies as solutions to leasing issues.
<b>MTW Housing Choice Voucher</b>	AH will continue efforts to recruit and retain landlords, especially those with one- and two-bedroom units. In addition, the COVID-19 pandemic may limit voucher management activities including lease-ups, program terminations, and HQS inspections. As a solution, AH may exercise HUD-approved COVID-19 Waivers as guidance for our property owner/manager partners and employ by-appointment, remote, and virtual strategies as solutions to leasing issues.
<b>Local, Non-Traditional</b>	AH will continue efforts to recruit and retain property owner partners willing to provide temporary and 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 completing planned development projects to add units to the housing stock.

## 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.	23,513	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 6,809 units at 84 sites.	26,605	Closed	No
Site-Based Administration – HomeFlex and Mixed-Communities	Community-wide unit WL for all population managed by property owners at the property level for nearly 3,337 units at 29 sites.	6,137	Partially Open	Yes

#### Please describe any duplication of applicants across waiting lists:

AH does not discourage families from applying to multiple sites. Therefore, there may be instances where families appear on multiple waitlists. For example, a family may appear on the MTW HCV waitlist as well as a site-based waitlists managed by property owners or property management agents. However, AH does monitor subsidy assistance to avoid and 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 local residency/employment preference ensures local families are issued an AH voucher before non-Atlanta residents or residents not employed within 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	AH may purge the HCV waitlist periodically in FY 2023, but does not plan to reopen it in FY 2023 or FY 2024. In addition, AH plans to evaluate the pros and cons of a centralized waiting list.
Choice Mobility Voucher (RAD Project-Based Vouchers)	N/A
Site-Based – Assorted Properties	Several of AH-Owned properties planned for RAD conversion in FY 2022 have closed waiting lists and the property managers and partners may open their waiting lists as needed. AH reserves the right to combine these waiting list into a centralized waiting list should AH deem this an appropriate action to achieve desired outcomes.

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

“AH is not proposing any new MTW activities for this fiscal year.”

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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	45	Section I.O: General Conditions; setting rents and term limits
AW	2005.02	Earned Income Disregard	46	Sections I.O and VII.A.4: General Conditions and . . . Authorized to Create its own HCV Program
AW	2005.03	Work / Program Requirement	47	Section I.O: General Conditions Section IV: Self-Sufficiency/Supportive Services
HC	2005.04	Enhanced Inspection Standards	48	Section VII: Establishment of HCV Program
HD	2005.06	Good Neighbor Program II	49	Section IV: Self-Sufficiency/Supportive Services Section V: Single-Fund Budget with Full Flexibility
HD	2005.06	Human Development Services	49	Section IV: Self-Sufficiency/Supportive Services Section V: Single-Fund Budget with Full Flexibility
PH	2005.07	4-to-1 Elderly Admissions	50	Section III: Occupancy Policies Section IV: Self-Sufficiency/Supportive Services
RE	2005.09	Reformulating the Subsidy Arrangement in Mixed-Use Communities	50	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	51	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	52	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	2005.11	Gap Financing	52	Second Amendment, Section 2: Use of MTW Funds Second Amendment, Section 3: Reinstatement of "Use of MTW Funds" Implementation Protocol



AH's MTW Activities				
Activity ID		Activity Name	Page	MTW Authorization(s) AH's Attachment D
HC	2006.01	AH Submarket Payment Standards	53	Section VII: Establishment of HCV Program
RE	2006.02	HomeFlex Site-Based Administration	54	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	54	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	55	Section VII: Establishment of HCV Program
RE	2007.03	Comprehensive Homeownership Program	56	Section V: Single-Fund Budget with Full Flexibility
RE	2007.04	HomeFlex as a Strategic Tool	57	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	58	Section I.O: General Conditions
HC	2008.02	Leasing Incentive Fee	58	Section VII: Establishment of HCV Program
PH	2008.03	Energy Performance Contracting	59	Section IX: Energy Performance Contracting
RE	2022.01	Choice Down Payment Assistance (DPA) Program	60	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 source(s). Households meeting 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 sites 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 opportunities with respect to property operations, compliance, and financial oversight.

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

AH does not plan any non-significant changes to this activity during the plan period.

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

AH does not plan any changes to Metrics/Data Collection to this activity during the plan period.

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

AH does not plan any significant changes to this activity during the plan period.

## **AW.2005.02 – EARNED 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**

AH does not plan any non-significant changes to this activity during the plan period.

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

AH does not plan any changes to Metrics/Data Collection to this activity during the plan period.

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

AH does not plan any significant changes to this activity during the plan 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 AH's goal of positioning 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 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 (ages 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 submit relevant documentation.

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**

Any non-significant changes planned for this activity would be related to relaxing enforcement resulting in terminations to align with any applicable federal, state, or local eviction moratoriums. Therefore, AH plans to resume enforcement of the work/program requirements whenever AH returns to 'normal' operations.

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

AH does not plan any changes to Metrics/Data Collection to this activity during the plan period.

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

AH does not plan any significant changes to this activity during the plan 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 while 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 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. **AH does not intend to prohibit participants from making interim HQS inspection requests nor does AH plan to allow unit quality to suffer. Therefore, AH will continue to allow participants to request interim inspections that they believe are necessary. Such inspections will fall under the "Special Inspections" category in the Quality Control (QC) pool. AH will continue to conduct random QC Inspections from this pool of HQS inspections performed. Therefore, biennial inspections will be QC'd in the same manner as initials, annuals, and other HQS inspections. AH believes that the continued use of special and random QC inspections ensures that the biennial inspection schedule will not have a detrimental effect on quality.**

**iii. Planned Non-Significant Changes**

AH plans to move its Housing Quality Inspection (HQS) Schedule from annual to biennial.

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

AH does not plan any changes to Metrics/Data Collection to this activity during the plan period.

**v. Planned Significant Changes**

AH does not plan any significant changes to this activity during the plan 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**

AH does not plan any non-significant changes to this activity during the plan period.

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

AH does not plan any changes to Metrics/Data Collection to this activity during the plan period.

**v. Planned Significant Changes**

AH does not plan any significant changes to this activity during the plan 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 (ages 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 AH does not plan any non-significant changes to this activity during the plan period, AH plans to evaluate closing out this activity because of its similarity to other MTW Activities.

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

AH does not plan any changes to Metrics/Data Collection to this activity during the plan period.

**v. Planned Significant Changes**

AH does not plan any significant changes to this activity during the plan 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**

AH does not plan any non-significant changes to this activity during the plan period.

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

AH does not plan any changes to Metrics/Data Collection to this activity during the plan period.

**v. Planned Significant Changes**

AH does not plan any significant changes to this activity during the plan 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.

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**

AH does not plan any non-significant changes to this activity during the plan period.

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

AH does not plan any changes to Metrics/Data Collection to this activity during the plan period.

**v. Planned Significant Changes**

AH does not plan any significant changes to this activity during the plan 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 housed in AH-Owned communities that may lack the mental health 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**

AH does not plan any non-significant changes to this activity during the plan period.

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

AH does not plan any changes to Metrics/Data Collection to this activity during the plan period.

**v. Planned Significant Changes**

AH does not plan any significant changes to this activity during the plan 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 increase access to quality amenities. 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**

AH does not plan any non-significant changes to this activity during the plan period.

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

AH does not plan any changes to Metrics/Data Collection to this activity during the plan period.

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

AH does not plan any significant changes to this activity during the plan 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. Without the ability to fund projects or co-invest with partners leads to delays for real estate development deals and contributes to increased costs. These actions are contradictory to spending Federal dollars effectively and efficiently and prevent AH from increasing 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 intends to issue construction loans, generally 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-deficient communities into amenity-rich communities and first choice options, where families can live, work, and play.

**iii. Planned Non-Significant Changes**

AH may contribute funds toward non-AH subsidized units intended to serve households up to 80% area median income (AMI) to increase the total number of affordable units, while decreasing AH's long-term obligations.

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

AH does not plan any changes to Metrics/Data Collection to this activity during the plan period.

**v. Planned Significant Changes**

AH does not plan any significant changes to this activity during the plan 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 2022, AH updated its submarket payment standards based on market studies that expanded the schedules to 24 submarkets from the previous update conducted in FY 2016. The new payment standards and submarket additions were not as dramatic a change as was the change in FY 2016, which expanded the payment schedules from 7 in 2007 to 23 submarkets.

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**

AH will add another submarket to this activity to update and align payment standards with market studies.

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

AH does not plan any changes to Metrics/Data Collection to this activity during the plan period.

**v. Planned Significant Changes**

AH does not plan any significant changes to this activity during the plan 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-Based 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 the property owner engaged a third-party supportive service provider 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 agents have full responsibility for performing all site-based administration tasks for the property, which is subject to AH inspections and reviews, and 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

AH does not plan any non-significant changes to this activity during the plan period.

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

AH does not plan any changes to Metrics/Data Collection to this activity during the plan period.

### v. Planned Significant Changes

AH does not plan any significant changes to this activity during the plan 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 low-income families.

**iii. Planned Non-Significant Changes**

AH does not plan any non-significant changes to this activity during the plan period.

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

AH does not plan any changes to Metrics/Data Collection to this activity during the plan period.

**v. Planned Significant Changes**

AH does not plan any significant changes to this activity during the plan 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. 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 2022, AH updated its submarket payment standards. These rents are subject to rent reasonableness determinations, which may include rent boosts for investments made in units in accordance with AH's energy efficiency guidance. 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**

AH does not plan any non-significant changes to this activity during the plan period.

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

AH does not plan any changes to Metrics/Data Collection to this activity during the plan period.

**v. Planned Significant Changes**

AH does not plan any significant changes to this activity during the plan 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. The activity also promotes homeownership opportunities in healthy, mixed-income communities through the provision of subordinated mortgage loans 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. 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 (16) matriculating through the HCV Homeownership Program under the original terms.

As developed, AH's DPA Homeownership Program assists more families than 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 DPA Program developed under this MTW Activity.

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

AH plans to increase the DPA maximum eligible sales price from \$275,000 to \$335,000 to align its program with the actual number of available homes to purchase in the city up to the higher price point. AH does not plan any other non-significant changes to this activity during the plan period.

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

AH does not plan any changes to Metrics/Data Collection to this activity during the plan period.

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

AH does not plan any significant changes to this activity during the plan 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 to project based them at properties that might otherwise not provide affordable units. Doing so has increased 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). Further AH may exercise two options under HOTMA to bring units under HAP contract more quickly. These options include utilization of the non-life-threatening (NLT) provision and the Alternative Inspection provision. The NLT provision permits AH to approve tenancy of a unit when a unit fails HQS provided the unit only has NLT deficiencies. The Alternative Inspection provision allows AH to approve tenancy of a unit when a property, prior to HQS inspection, has passed an inspection in the past 24 months.

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**

AH does not plan any non-significant changes to this activity during the plan period.

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

AH does not plan any changes to Metrics/Data Collection to this activity during the plan period.

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

AH does not plan any significant changes to this activity during the plan 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, 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

AH does not plan any non-significant changes to this activity during the plan period.

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

AH does not plan any changes to Metrics/Data Collection to this activity during the plan period.

### v. Planned Significant Changes

AH does not plan any significant changes to this activity during the plan 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)<sup>13</sup>. 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.

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.

<sup>13</sup> Set by HUD annually.

The Leasing Incentive Fees 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**

AH does not plan any non-significant changes to this activity during the plan period.

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

AH does not plan any changes to Metrics/Data Collection to this activity during the plan period.

**v. Planned Significant Changes**

AH does not plan any significant changes to this activity during the plan 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**

AH does not plan any non-significant changes to this activity during the plan period.

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

AH does not plan any changes to Metrics/Data Collection to this activity during the plan period.

**v. Planned Significant Changes**

AH does not plan any significant changes to this activity during the plan period.

## RE.2021.01 – CHOICE DOWN PAYMENT ASSISTANCE (DPA) PROGRAM

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

Activity approved in FY 2021 and implemented in 2023. Activity not amended since implementation.

### ii. Description/Update

AH utilizes MTW Authorization Section V.A: Single-Fund Budget with Full Flexibility under Attachment D of its Amended and Restated MTW Agreement to establish a Choice Down Payment Assistance (DPA) Program to promote and increase homeownership opportunities for low to moderate-income families within the University Choice Neighborhood (UCN).

AH is transforming its former public housing site, University Homes, renamed Scholars Landing and revitalizing the UCN, comprised of Ashview Heights, Atlanta University Center, and Vine City neighborhoods (image to right) through a \$30 million Choice Neighborhoods Implementation Grant award. The transformation effort entailed four phases of rental units and a fifth phase, a homeownership component that includes a combination of townhomes, flats, and condominiums.

Under this activity, AH will award eligible, qualified households earning up to 80 percent of the area median income (AMI) a one-time assistance product in the form of a subordinated mortgage loan. The one-time assistance product is open to eligible applicants and an exclusive award for first time homebuyers seeking to purchase a home constructed at Scholars Landing or within the identified UCN boundaries.



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 to moderate-income households. To ensure affordability for these families within the target area, AH anticipates awarding a deferred mortgage loan up to \$60,000 per unit.

This activity supports increasing housing choices and homeownership for low-income families within a rapidly changing and growing area of the city that abuts the Mercedes Benz Stadium and Atlanta's central business district.

### iii. Planned Non-Significant Changes

AH does not plan any non-significant changes to this activity during the plan period.

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

AH does not plan any changes to Metrics/Data Collection to this activity during the plan period.

### v. Planned Significant Changes

AH does not plan any significant changes to this activity during the plan 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 later.
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 estimated 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	
AW. 2011.02	HCV Program Housing Assistance Payment Abatement Policy	2011	2011	2022	AH did not need an MTW waiver to conduct this activity.
AW. 2011.03	Aging Well Program	2011	2011	2022	AH did not need an MTW waiver to conduct this activity.
RE 2012.01	Single Family Home Rental Demonstration	2012	2012	2021	AH met its obligation to deliver 26 homes under this format. Until homebuyers completed home purchase, AH will manage a long-term ground lease.
HC. 2012.02	Comprehensive Graduation Program	2012	N/A	2019	AH determined that this activity requires more research. AH may propose this activity later.
SH 2013.01	Veterans Supportive Housing	2013	2013	2022	AH no longer needs an MTW waiver to conduct this activity.
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 later.
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.

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## V. PLANNED APPLICATION OF MTW FUNDS

### A. Planned Application 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.

**Note:** the information collected in this section is to fulfill MTW programmatic reporting requirements and does not replace the MTW PHA's obligation to annually complete its audited financial statements through HUD's Financial Data Schedule (FDS)

FDS LINE ITEM NUMBER	FDS LINE ITEM NAME	DOLLAR AMOUNT
70500 (70300+70400)	Total Tenant Revenue	\$4,514,401
70600	HUD PHA Operating Grants	\$300,621,301
70610	Capital Grants	\$3,168,435
70700 (70710+70720+70730+70740+70750)	Total Fee Revenue	\$314,592
71100+72000	Interest Income	\$221,550
71600	Gain or Loss on Sale of Capital Assets	\$120,765
71200+71300+71310+71400+71500	Other Income	\$845,402
70000	Total Revenue	\$309,806,446

#### ii. Estimated Application of MTW Funds

The MTW PHA shall provide the estimated application of MTW funding in the plan year by Financial Data Schedule (FDS) line item. Only amounts estimated to be spent during the plan year should be identified here; unspent funds that the MTW PHA is not planning on expending during the plan year **should not be** included in this section.

**Note:** the information collected in this section is to fulfill MTW programmatic reporting requirements and does not replace the MTW PHA's obligation to annually complete its audited financial statements through HUD's Financial Data Schedule (FDS)

FDS LINE ITEM NUMBER	FDS LINE ITEM NAME	DOLLAR AMOUNT
91000 (91100+91200+91400+91500+91600+91700+91800+91900)	Total Operating - Administrative	\$50,385,668
91300+91310+92000	Management Fee Expense	\$941,149
91810	Allocated Overhead	\$0
92500 (92100+92200+92300+92400)	Total Tenant Services	\$3,535,372
93000 (93100+93600+93200+93300+93400+93800)	Total Utilities	\$2,954,375
93500+93700	Labor	\$0
94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	\$4,702,911
95000 (95100+95200+95300+95500)	Total Protective Services	\$1,406,042
96100 (96110+96120+96130+96140)	Total Insurance Premiums	\$893,775
96000 (96200+96210+96300+96400+96500+96600+96800)	Total Other General Expenses	\$11,746,169
96700 (96710+96720+96730)	Total Interest Expense & Amortization Cost	\$153,241
97100+97200	Total Extraordinary Maintenance	\$5,506,901

FDS LINE ITEM NUMBER	FDS LINE ITEM NAME	DOLLAR AMOUNT
97300+97350	HAP + HAP Portability-In	\$149,590,590
97400	Depreciation Expense	\$2,960,284
97500+97600+97700+97800	All Other Expense	\$75,029,969
90000	Total Expenses	\$309,806,446

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

N/A
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### 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 APPLICATION OF MTW FUNDING FLEXIBILITY

AH will spend its MTW Funds, defined as its Public Housing Operating Subsidy, Housing Choice Voucher funds, and certain capital funds combined into a single fund pursuant to the authority outlined in AH's MTW Agreement, on MTW eligible activities.

AH does not identify a singular activity nor multiple activities in which AH utilizes 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. Rather, unless non-MTW funds are specifically used, AH considers all activities involved in providing affordable housing to residents of Atlanta as utilizing MTW Single Fund Flexibility, as AH does not focus on specific programmatic requirements, but makes business decisions based on sound business intelligence and analysis.

AH continues 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 which AH determined to best use of funds for the purposes of fulfilling its mission to deliver innovative, affordable housing.

### iv. Planned Application of PHA Unspent Operating Fund and HCV Funding

Original Funding Source	Beginning of FY: Unspent Balances	Planned Application of PHA Unspent Funds during FY
HCV HAP*	\$0	\$0
HCV Admin Fee	\$0	\$0
PH Operating Subsidy	\$0	\$0
<b>TOTAL:</b>	<b>\$0</b>	<b>\$0</b>

#### Description of Planned Expenditures of Unspent Operating Fund and HCV Funding

The MTW PHA shall provide a description of planned activities and/or use(s) for unexpended Operating Fund and HCV Funding. The original funding source is defined as the legacy MTW PHA's appropriated Section 8 and Section 9 funding source(s) (HCV HAP, HCV Admin Fee, and PH Operating Subsidy). The MTW agency receives this information in their Annual Renewal Allocation, which provides a breakdown of the annual obligations for HCV HAP. For HCV Admin Fee, the biannual cash management reconciliation includes the HCV Admin Fee that has been earned at two points during the year; midyear at June 30<sup>th</sup> and end-of-year at December 31<sup>st</sup>. For the public housing operating fund unspent balance, the MTW PHA may derive their unspent funds by subtracting current assets from current liabilities in the most recent FDS submission. Current assets are the sums of FDS lines 111, 114, 115, 120, 131, 135, 142, 144, and 145. Current liabilities are the sums of FDS line 310 and 343. Table XX below represents the applicable FDS lines with definitions that MTW PHA(s) should

utilize to calculate public housing operating fund unspent funds. More information on FDS line items can be found at: [https://www.hud.gov/sites/dfiles/PIH/documents/FDSLLineDefinitionGuide\\_vJuly2020.pdf](https://www.hud.gov/sites/dfiles/PIH/documents/FDSLLineDefinitionGuide_vJuly2020.pdf)

Table XX: FDS Line Items Used to Calculate Public Housing Operating Fund Unspent Funds

FDS Line Number	FDS Line Item	Definition
<b>Current Assets</b>		
111	Cash-Unrestricted	This FDS line represents cash and cash equivalents in any form available for use to support any activity of the program or project.
114	Cash-Tenant Security Deposits	This FDS line represents cash in the Security Deposit Fund.
115	Cash-Restricted for Payment of Current Liabilities	This line represents restricted cash and cash equivalents that are only to be expended for specified purposes.
120	Total Receivables	This line represents the total of all receivables less the amounts established as allowances for estimated uncollectible amounts.
131	Investments-Unrestricted	This line represents the fair market value of all investments which can be used to support any activity of a program, project, activity, COCC, or entities.
135	Investments-Restricted for Payment of Current Liability	This line represents the fair market value of all investments designated for specific purposes that will be used to liquidate a current liability in the next fiscal year or offset unearned revenue.
142	Prepaid Expenses and Other Assets	This line represents all prepaid expenses. These are not expected to be converted.
144	Inter-program-Due From	This line represents amounts due from other PHA projects, programs, and activities of a temporary nature.
145	Assets Held for Sale	This line item represents assets that the entity expects to sell to qualified applicants. This line item is typically used as part of the homeownership program.
<b>Current Liabilities</b>		
310	Total Current Liabilities	This FDS line is the sum of lines 311 through 348 and represents the total of all current liabilities.
343	Current Portion of Long-Term Debt (Capital Projects/Bonds)	This line includes the current portion of debts acquired and debts issued for capital purposes of the PHA/entity.

For HCV funding, the biannual cash management reconciliation for HUD-held reserves includes both HCV and SPV reserves. MTW PHA(s)' accounting records should include sufficient detail to report on the amount that are HCV versus SPV reserves. Where possible, please identify the planned use, the estimated amount, to which funding source the planned use(s) is attributable, as well as the projected timeline or timeline update.

**Note:** the information collected in this section is to fulfill MTW programmatic reporting requirements and does not replace the MTW PHA's obligation to annually complete its audited financial statements through HUD's Financial Data Schedule.

Regardless of the balance identified as Unspent Operating Fund and HCV Funding, AH spends all the funds disbursed by HUD for Operating Fund within 30 days of receipt; and spends all HCV funds within 30 days of disbursement. Due to HUD's Cash Management program, HUD only provides HCV funds equal to prior month HAP spending each month. AH then requests additional cash from HUD to cover prior month MTW-authorized operations and activities and additional cash to support no more than the remaining month of estimated operations and activities.

\* Unspent HAP funding should not include amounts recognized as Special Purpose Vouchers reserves.

\*\* HUD's approval of the MTW Plan does not extend to a PHA's planned usage of unspent funds amount entered as an agency's operating reserve. Such recording is to ensure agencies are actively monitoring unspent funding levels and usage(s) to ensure successful outcomes as per the short- and long-term goals detailed in the Plan.

## B. Local Asset Management 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 127 of Appendix E

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 propose any changes to the LAMP for FY 2023.

## 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 1,628 units and plans to convert 392 units during FY 2023. AH received several Commitment to Enter into Housing Assistance Payments (CHAPs) in 2018, and various new CHAPs in FY 2022. AH is working to convert its remaining approved public housing portfolio of units by FY 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

## VI. ADMINISTRATIVE

### A. Board Resolution and Certifications of Compliance

Please **see page 75 of Appendix A** to review the Board Resolution and Certifications of Compliance.

### B. Documentation of Public Process

**AH's FY 2023 MTW Annual Plan is available** for public review and comment on its website and through AH's social media platforms from **February 9 through March 11**. In addition, AH holds 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 99 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 its 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 123 of Appendix D** to review applicable document.

## The Impact of COVID-19

Since FY 2021, AH has operated under the challenges posed by the coronavirus (COVID-19) pandemic, which has increased operational expenses, extended timelines, and posed a variety of administrative and operational challenges. The passage of the Coronavirus Aid, Relief and Economic Security (CARES) Act and utilization of HUD-approved COVID-19 Statutory and Regulatory Waivers<sup>16</sup>, provided AH some financial relief and in some cases offered more flexibility than some of AH's existing MTW Authorizations allow.

During FY 2022, AH joined other PHAs in petitioning HUD to extend many expiring COVID-19 Waivers so that COVID-19 parameters and protocols could remain in place. Based on the current outlook, **AH expects to continue operating under some limitations in FY 2023**. Therefore, AH expects to administer COVID-19 Waivers as approved or extended by HUD and prepares its FY 2023 MTW Annual Plan anticipating some form of COVID-19 parameters and protocols will influence AH operations during FY 2023. AH does not expect the need to postpone new program introductions because of COVID-19, but if delays are required, AH will appropriately document related issues in its MTW Report, as applicable.

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<sup>16</sup> Outlined in Notice PIH 2020-05

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## **Appendix A: HUD Form 50900 Attachments**

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Board Secretary Certificate  
Board Resolution  
Certifications of Compliance

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## Appendix A: Board Secretary Certificate


### 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, Georgia ("AHA"). In such capacity, I am custodian of its records and I am familiar with its organization, membership and activities.
2. Attached hereto as Exhibit 1 is a true and correct copy of the resolution authorizing AHA to submit its Fiscal Year 2022 Moving To Work (MTW) Annual Report to the United States Department of Housing and Urban Development in accordance with AHA's Amended and Restated MTW Agreement.
3. This resolution was presented to the AHA 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:  
  
Dr. Christopher Edwards, Chair  
Kirk Rich  
Robert Highsmith, Esq.  
Pat Dixon, Jr.  
Tené Traylor  
Rosalind Elliott  
Shelia Harris
5. At the Meeting, the Board 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 23<sup>rd</sup> day of March, 2022.

SEAL



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

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**RESOLUTION OPS-1**

**TO AUTHORIZE THE HOUSING AUTHORITY OF THE CITY OF ATLANTA,  
GEORGIA TO APPROVE AND SUBMIT ITS FISCAL YEAR 2023 MOVING TO  
WORK ANNUAL PLAN TO THE UNITED STATES DEPARTMENT OF HOUSING  
AND URBAN DEVELOPMENT**

**WHEREAS**, The Housing Authority of the City of Atlanta, Georgia (“AH”) executed its Amended and Restated Moving To Work (“MTW”) Agreement, effective as of November 13, 2008, as extended by Congress to June 30, 2028 under the same terms and conditions and confirmed by the U.S. Department of Housing and Urban Development (“HUD”) on April 14, 2016, and as further amended by First, Second, Third, and Fourth Amendments to the Moving to Work Agreement, effective as of December 1, 2020;

**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**, 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”) 2023 MTW Annual Plan (also referred to herein as the “FY 2023 MTW Annual Plan”);

**WHEREAS**, the FY 2023 MTW Annual Plan identifies AH’s priorities, projects, activities and initiatives for AH’s FY 2023 and any policy changes to be implemented during FY 2023;

**WHEREAS**, AH’s FY 2023 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**, AH 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;

**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 March 1, 2022;

**WHEREAS**, during FY 2023, 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 AH 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 2023, 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, and revisions are made to it to comport with the policy changes described in Exhibit OPS-1-A;

**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 2023 MTW Annual Plan; (ii) authorize the submission of AH's FY 2023 MTW Annual Plan to HUD; (iii) authorize the 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 2023 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 2023 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 Fiscal Year ("FY") 2023 Moving to Work Annual Plan (the "FY 2023 MTW Annual Plan"), including the projects, activities, initiatives and any policy changes that will be implemented during FY 2023 as substantially described in Exhibit OPS-1-A, is hereby approved.
2. Each of the Chair of the Board of Commissioners and the President and Chief Executive Officer/Secretary, as required, 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 2023 MTW Annual Plan.



## Appendix A: Board Resolution

3. The Amended and Restated Statement of Corporate Policies, is hereby approved in conjunction with AH's FY 2023 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 2023 MTW Annual Plan and such other required documents, certifications or forms to HUD with such changes, additions, corrections or amendments as he 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 2023 MTW Annual Plan.

[Signatures on the Following Page]

## 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, 23<sup>rd</sup> day of March 2022.

ATTEST:

APPROVAL:



Eugene E. Jones, Jr.  
President and Chief Executive Officer



Christopher R. Edwards, M.D.  
Chair

APPROVAL FOR FORM AND LEGAL SUFFICIENCY:



Dwayne C. Vaughn  
General Counsel

## FY 2023 MTW ANNUAL PLAN PRESENTATION



### INTRODUCTION

The purpose of this meeting is to receive comments on AH's Fiscal Year (FY) 2023 Moving-to-Work (MTW) Annual Plan. As an MTW agency, AH is permitted to waive certain HUD rules and regulations to craft innovative solutions to local housing challenges.

Highlighted contents of the Plan include:

- Agency Priorities
- Current, modified, and planned MTW Activities
- Operational Activities
- Other Agency Activities

**Public Comment Period: February 9 through March 11, 2022**

You can view the Plan at [www.atlantahousing.org/about-us/plans-reports/](http://www.atlantahousing.org/about-us/plans-reports/) or at one of AH's communities during this period.



## WHO WE SERVE

We serve **extremely low to moderate income** working families, seniors, veterans, individuals with disabilities, and those experiencing or at-risk of homelessness



### 26,507

households served  
in FY 2021 including:

**3,546** households with disabilities

**7,458** senior households

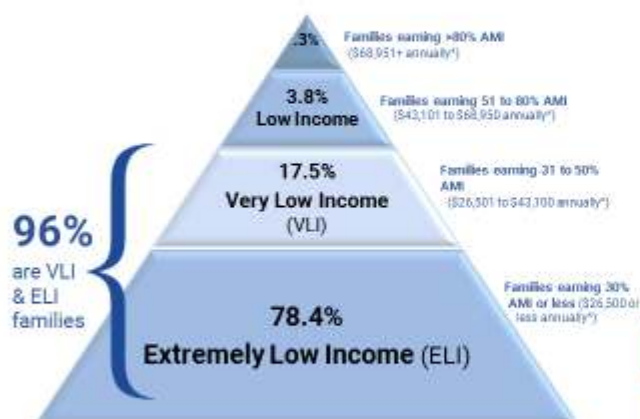
**8,087** households with children

### 79%

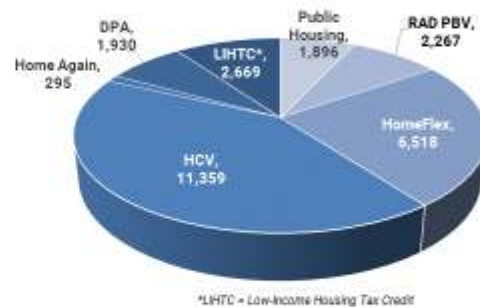
make **less than**  
\$26,500 annually

## PROJECTED FY 2023 HOUSEHOLDS SERVED

26,934 Projected Total Households (HHs) Served in FY 2023



\*Source: HUD Income Limits approved April 2021 and based on a Family of Four.



427 Projected New Households

### 156

New HFX  
Households

### 7

New Choice DPA  
Households

### 264

New DPA  
Households



## CREATION & PRESERVATION

### Overview of New Units

Atlanta continues to face the twin challenges of rapid growth and increasing market rents.

AH plans to create **up to 958 new affordable housing units** during FY 2023 to combat these challenges.

#### Projected New Affordable Unit Count

- **531 new units** through 9 project financial closings in FY 2023.
- **156 HomeFlex\* units** through 11 new HomeFlex Agreements.
- **7 homeownership opportunities** under the Choice Down Payment Assistance (DPA) Program.
- **264 DPA awards** planned for eligible first-time homebuyers in FY 2023.

\*AH's MTW project-based rental assistance program



## CREATION & PRESERVATION

### FY 2023 Construction In-Progress

Advance the construction of up to **1,123 projected new affordable units** and oversee the substantial rehabilitation and preservation of **372 existing affordable units** through RAD.

#### RAD REHAB PROGRESS

- James Allen, Jr. Tower (Hightower)
- Barge Road
- Villages at Castleberry II

#### CONSTRUCTION PROGRESS IN FY 23

- Ashley at Scholar's Landing IC (50 units)
- Ashley Scholar's Landing II (114 units)
- Juanita H. Gardner Village (108 units)
- London Townhomes, Phase 3 (60 units)
- Madison Reynoldstown (116 units)
- Magnolia Perimeter (18 units)
- Mechanicsville (28 units)
- Stone Hogan: Flats (256 units)
- Stone Hogan: Villas (190 units)
- Sylvan Hills II (87 units)
- West Highlands (3B, Perry, WACS) (52 units)
- Westside Square (44 units)



## CREATION & PRESERVATION

### FY 2023 Projected Financial Closings: Co-Investment

AH plans to financially close on **233 projected affordable units\*** to advance 3 projects toward groundbreaking.

**44**

Affordable Units at  
Westside Square in  
partnership with  
Invest Atlanta

**87**

Affordable Units at  
Sylvan Hills II in  
partnership with  
Invest Atlanta

**102**

Affordable Units at  
Heritage at West Lake

*\*Units are generally categorized as Local, Non-Traditional units; other projects may close in FY 2023—AH reserves the right to participate in future deals not covered here, including but not limited to: Stone Hogan (FY 22 carryover, St. Mark's, and/or Forest Cove); AH participation may include acquisition of land.*



## CREATION & PRESERVATION

### FY 2023 Projected Financial Closings on AH Land

**100**

Affordable Units at  
Englewood IA  
Multi-Family project

**80**

Affordable Units at  
Englewood IB Senior  
Project

**28**

Affordable  
Homeownership  
Units at  
Mechanicsville

**Up to 298** Projected  
New Units on AH Land

**8**

Affordable  
Homeownership Units  
at Scholar's Landing

**64**

Affordable  
Homeownership  
Units at three West  
Highlands sites  
(3B/WACS/2000  
Perry)

**18**

Affordable Units at two  
Magnolia Perimeter  
sites (ANDP, Quest &  
WFF)





## CREATION & PRESERVATION

### Projected New HomeFlex Agreements

AH plans to **add 156 projected new HomeFlex units** during FY 2023.



(Abbington Ormewood Park)

- 1055 Arden (6 units)
- 1265 Lakewood (16 units)
- 356 James P. Brawley Drive (8 units)
- 588 & 592 Paines Avenue (8 units)
- Abbington Ormewood Park (8 units)
- Intrada Westside (25 units)
- McCauley Park Phase I (30 units)
- Stanton Park (10 units)
- The Mallory (14 units)
- Thrive Sweet Auburn (23 units)
- WFF Dalvigney & Echo (8 units)



## CREATION & PRESERVATION

### Preserving Existing Units

In addition to creating affordable units, AH is committed to preserving affordable units in its housing assistance portfolio\*

AH plans to **preserve up to 1,670 existing affordable units** during FY 2023.

- **1,097 affordable units** projected to be preserved by renewing 18 expiring HomeFlex Agreements
- **573 affordable units** projected to be preserved by converting PH units to RAD PBV\* and non-RAD PBV\* units

\*AH may also participate in deals to preserve expiring affordable units or "naturally-occurring affordable" units that are not currently in its portfolio, either through acquisition, deal participation, or other means.

\*RAD PBV = Rental Assistance Demonstration Project-Based Voucher





## CREATION & PRESERVATION Projected Housing Lease Ups

Projects are constructed in phases and are transitioned from the development phase to the occupancy phase upon completion.

AH expects to lease up **238 units** available for occupancy during FY 2023.

- **Lease up 63 rehabilitated units** at London Townhomes (308 Scott St.).
- **Lease up 67 modernized units** at Capitol View (1198 Metropolitan Pkwy):
  - 43 Standard HomeFlex assisted units and
  - 24 Supportive Housing-HAVEN assisted units.
- **Lease up 108 new construction units** at Juanita Gardner (3650 Bakers Ferry Road, SW)



## CREATION & PRESERVATION Disposition & Demolition

**Special Applications Center (SAC)** submissions to dispose of parcels or demolish structures to advance revitalization.

### Planned SAC Submissions:

- |                                                                                             |                                 |
|---------------------------------------------------------------------------------------------|---------------------------------|
| • Englewood IA, IB, IC, IIA, IIB, IIC                                                       | • Villages at Carver I          |
| • Jonesboro North                                                                           | • Magnolia Perimeter (3 Phases) |
| • Jonesboro South                                                                           | • Civic Center                  |
| • Mechanicsville Homeownership                                                              | • Bowen Homes                   |
| • West Highlands (2000 Perry, 3B South, 7 Acres of former Perry Homes)                      | • 301 North Avenue              |
| • Bankhead                                                                                  | • Palmer House                  |
| • Vacant properties associated with the following sites: Capitol, Carver, Grady, and Harris | • Johnson Road (Demo/Dispo)     |
| • University Homes (offsite)                                                                | • Gilbert Gardens Annex         |
|                                                                                             | • Leila Valley                  |
|                                                                                             | • Hollywood Courts              |



## CREATION & PRESERVATION

### Possible Acquisitions

Occasionally, AH may **seek strategic acquisitions** of parcels that complement existing revitalization activities on AH land.

#### Possible FY 2023 acquisitions:

- Bowen Homes
- Mechanicsville
- Chosewood Park (Land Swap)



## CREATION & PRESERVATION

### Planned Infrastructure Improvements

AH may begin construction on **infrastructure and public improvements** necessary to implement planned revitalization activities.

#### Possible FY 2023 infrastructure improvements:

- Herndon Square
- Englewood
- Herndon
- Civic Center
- West Highlands
- Mechanicsville
- North Avenue





## CREATION & PRESERVATION Other Activities

- Implement Roosevelt Hall Use Plan
  - Occupy Roosevelt Hall
  - Design Tenant improvement allowance
- Continue elements of Critical Community Improvements Plan
- Pursue Choice Neighborhoods Implementation Grants for Bowen Homes
  - Bowen grant would complement \$450k Choice Neighborhoods Planning Grant received for Bowen Homes
- Choice Neighborhoods Planning or Implementation Grants for eligible projects, including Thomasville Heights



## CREATION & PRESERVATION MTW Activities

AH may amend its existing **Gap Financing** MTW activity.

AH seeks to **contribute gap financing** toward non-AH subsidized affordable units (up to 80% of AMI) constructed on AH-owned land.

Doing so would **allow AH to increase the total number of affordable units**, while decreasing AH's long term obligations





## ENHANCE ASSISTANCE PROGRAMS

### Housing Choice Vouchers

- Known as Section 8, gives participants the freedom to choose where they live
- Participant pays **30% of their income** toward their monthly rent, Atlanta Housing pays the balance
- Certified inspection team focuses on tenant and landlord experience and ensures all homes meet our enhanced standards

**FY 2023**

**350**  
projected new landlords recruited onto HCV Program



## ENHANCE ASSISTANCE PROGRAMS

### Maintain the Highest Standards

**17,370 Annual HQS Inspections\*:**

<b>9,632</b> Housing Choice Units	<b>7,738</b> HomeFlex units
--------------------------------------	--------------------------------

\*HQS count excludes re-inspections, specials, and quality control inspections

- Administer AH's Biennial HQS Inspection Program
- Administer Energy Efficiency Rent Boost Program



## ENHANCE ASSISTANCE PROGRAMS

### Stabilize At-Risk Families

- Stable housing with intensive case management and support services for those transitioning out of chronic homelessness
- Short-term assistance and permanent supportive housing (PSH)
- **550 vouchers committed** for PSH NOFA with Partners for Home
- **Haven units** supporting disabled and formerly homeless or at-risk persons

# 132

New HAVEN HomeFlex units projected to come online in FY 2023

# 295

Home Again families projected in FY 2023

# 202

Emergency Housing Vouchers to be administered with MTW flexibility

## FY 2023

Support

# 264

new homebuyers with DPA

Create

# 7

homeownership opportunities under Choice DPA Program\*

\*Opportunity exclusive to homes within the University Choice Neighborhood boundaries

## ENHANCE PROGRAMS

### Down Payment Assistance

- Award **271 eligible first-time homebuyers** positioned to purchase a **home down payment assistance** (DPA) to increase housing choices:
  - AH's homeownership assistance previously focused on awards in areas around HOPE VI sites. Since then, AH expanded its assistance boundary to the city of Atlanta.
  - AH gives a priority and higher level of assistance to families currently or formerly assisted by any of AH's rental assistance programs.
  - AH also provides a higher level of assistance to persons employed in the education, public safety, and healthcare fields.
  - AH's DPA award can be combined with other DPA awards to maximize affordability in purchasing a home within AH's service jurisdiction.

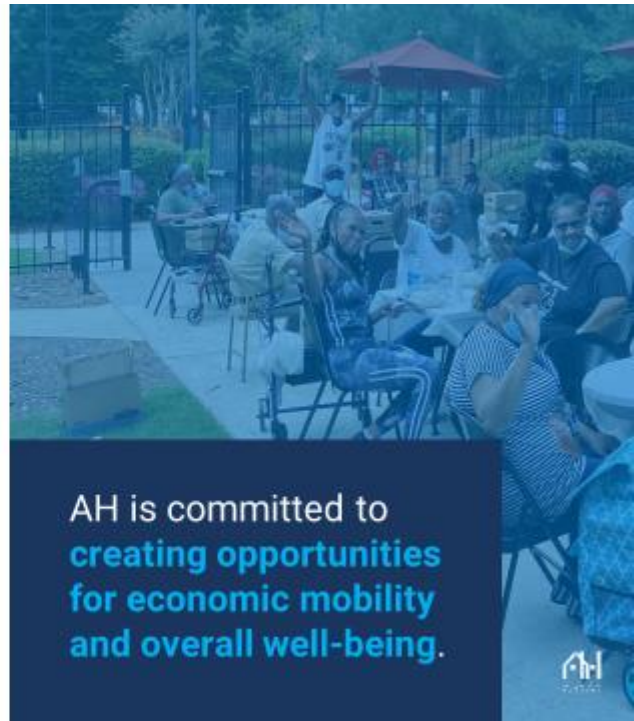




## ECONOMIC MOBILITY Resources for Residents

In FY 2023, AH will invest in local non-profits to provide education and workforce training.

- Computer Literacy
- Education: College application assistance and referral to scholarship opportunities
- Employment: Search and soft skills
- Financial Literacy: Banking and credit management



## ECONOMIC MOBILITY Job Resources

- **Make resident connections to programs and services.**
  - Continue referral efforts under Human Development Services (HDS) that increase marketable skills and knowledge
- **Expand training and job opportunities for residents in high paying fields.**
  - Advance AHGreen program to offer training for green and clean energy jobs.
  - Sponsor ACCESS\* technical education cohort and recruit external partners for job placement opportunities.

\*ACCESS = Achieving Connectivity to Create Equity and Self-Sufficiency



## ECONOMIC MOBILITY Youth Scholarships

### Planned Self-Sufficiency Activities

- **Raise funds for college scholarships** to support AH-assisted youth.
  - Market the James Allen Community Scholars Award, University Choice Neighborhoods Scholarship, and other opportunities to college age youth (17-23 years old).



To help **move households forward**, AH aims to position AH resources to **advantage future families**.

## IMPROVE ADMINISTRATION

### Administration Activities

- Find savings and ways to **reduce costs**.
- Pursue **other funding opportunities**:
  - Federal, philanthropic, tax credits, bonds, and revenue generating projects
- Monitor Section 3 protocols to ensure compliance:
  - Diversity efforts with contracts and procurement
  - Recruitment and retention of assisted households





## IMPROVE ADMINISTRATION MTW ACTIVITIES



- Administer current MTW Activities.
- Modify existing MTW Activities for clarity and alignment with AH's business model.
- Review operations, collect data to propose new MTW Activities that help streamline processes, provide incentives, or increase housing choices.
- Close out dated, obsolete activities:
  - HCV Program HAP Abatement Policy;
  - Aging-Well Program; and
  - Veterans Supportive Housing.



**THANK  
YOU!**  
QUESTIONS?



### Public Comments Feel free to reach out to us:

By Email: [strategy@atlantahousing.org](mailto:strategy@atlantahousing.org)

By Message Line: 404.817.7458

By US Mail: MTW Office  
230 John Wesley Dobbs Avenue  
Atlanta, GA 30303-2429

MTW Annual Plan Public Comment Period  
Stakeholders Briefing  
February 9 – March 11, 2022



@housingatlanta  
[www.atlantahousing.org](http://www.atlantahousing.org)

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CERTIFICATIONS OF COMPLIANCE	
<p align="center"><b>U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT</b>  <b>OFFICE OF PUBLIC AND INDIAN HOUSING</b></p> <p align="center"><b>Certifications of Compliance with Regulations:</b>  <b>Board Resolution to Accompany the Annual Moving to Work Plan</b></p>	
<p>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 (07/01/2022) 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:</p>	
(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 identity, 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 Part 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.

The Housing Authority of the City of Atlanta

GA 006

**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).*

Christopher R. Edwards, M.D.

Chair, Board of Commissioners

**NAME OF AUTHORIZED OFFICIAL**

**TITLE**

**SIGNATURE**

March 23, 2022

**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.

## Appendix B: Public Process Documentation

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### Summary Documentation

Overview of Stakeholders Briefings and Public Hearing  
Public Comments

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## DOCUMENTATION OF PUBLIC PROCESS

In accordance with the City of Atlanta, Georgia and national protocols, **AH suspended in-person public meetings/hearings and some internal in-person meetings in response to the Coronavirus (COVID-19) pandemic.** As an alternative, AH conducted virtual meetings whenever possible and especially applicable to AH's Fiscal Year (FY) 2023 Annual Moving to Work (MTW) Plan (**The Plan**) preparation process.

AH's Plan is the product of an inclusive annual planning process involving consultation with AH-assisted families across all programs, strategic partners, service providers, local community members and housing advocacy organizations, state and local agencies, elected and appointed officials, AH staff, executive leadership, members of the public, and AH's Board of Commissioners. Below is a summary of AH's Stakeholders Briefings (public meetings) and public hearing held during its **public comment period: February 9, 2022 through March 11, 2022** that focused on AH's FY 2023 MTW Annual Plan and proposed policy changes.

FY 2023 Public Hearing Notification and Stakeholders Briefings				
Meeting/Hearing Date	Stakeholders Group	Total Attendance	Public	AH Staff
Tuesday, January 11, 2022	Atlanta Continuum of Care (CoC)	172	170	2
	CoC Newsletter Distribution	732	NR*	
Tuesday, February 8, 2022	Academia, Housing Advocates, and Legal	25	17	8
Tuesday, February 8, 2022	Integral Development Group	27	11	16
Thursday, February 10, 2022	Columbia Residential	33	22	11
Thursday, February 10, 2022	Jurisdiction Wide Council (JWC)	14	9	5
Thursday, February 10, 2022	Landlord Advisory Committee	92	77	15
Tuesday, February 15, 2022	Choice Neighborhood Advisory, Human Development Services, and Real Estate Sub-Cabinet	32	22	10
Thursday, February 17, 2022	Business and Philanthropy	18	4	14
Thursday, February 24, 2022	Public Officials	31	17	14
<b>Tuesday, March 1, 2022</b>	<b>Public Hearing</b>	<b>242</b>	<b>223</b>	<b>19</b>
<b>Total Attendance: Stakeholders Briefings and Public Hearing Notification:</b>		<b>1,418</b>	<b>572</b>	<b>114</b>

\*Not reported or unavailable.



## Appendix B: Public Process Page2

Pursuant to COVID-19 protocols, The Plan was available for review on AH's website. Even so, AH sent The Plan or presentation materials electronically to individuals, communities, and organizations by request. AH accepted comments on The Plan during Stakeholder Briefings (public meetings) and the public hearing via the Zoom platform, in writing by US Mail, electronically via fax or email, or by phone via a dedicated voice mailbox. AH includes all comments received by March 14, 2022 in this Plan.

AH communicated notification of The Plan, its availability and the Public Hearing via public notices posted in AH-Owned communities and buildings, on AH's website, via electronic correspondences to AH Stakeholders, and via local and social media outlets. Additionally, to address the diversity of AH residents in AH-Owned communities; AH translated posted notices, by request, into Chinese, Korean, Russian, and Spanish. Public Notices announcing AH's Public Hearing appeared in the following media publications:

FY 2023 Stakeholders Briefings and Public Hearing Notifications	
Publication	Publication of Notification
Atlanta Journal Constitution	Monday, February 14, 2022
Fulton County Daily Report	Thursday, February 17, 2022
Mundo Hispanico Ediciones	Thursday, February 17, 2022
Fulton County Daily Report	Tuesday, February 22, 2022
Mundo Hispanico Ediciones	Thursday, February 24, 2022
The Atlanta Voice	Friday, February 25, 2022
Atlanta Journal Constitution	Sunday, February 27, 2022
The Atlanta Voice	Tuesday, March 1, 2022

AH's 2023 STAKEHOLDERS BRIEFINGS AND PUBLIC HEARING SESSIONS			
Meeting / Hearing Date	Stakeholder Group	Public Comment	AH Response / Action
Tuesday, January 11, 2022	Atlanta Continuum of Care (CoC)	No Comments Received	AH continues to value and appreciate the collaboration with the CoC and its member agencies
Tuesday, February 8, 2022	Academia Legal Housing Advocates	Is the Magnolia Perimeter project the Bankhead project?	Although close to Bankhead Homes, the Magnolia Perimeter development sits on the perimeter of Magnolia Park Apartments.
		Is there a plan in place to get more landlords?	AH utilizes several measures to actively recruit landlords to its HCV Program. AH also has staff dedicated to recruiting and retaining landlord partners. AH also utilizes several incentive programs to entice and retain landlord participation. Some of those programs include a Leasing Incentive Fee, an Energy Efficiency Rent Boost Program under its rent reasonableness policy, and inspection incentives, such as a Biennial HQS Inspection Schedule that "rewards" landlords and residents. Finally, AH recently updated its payment standards to ensure landlords receive a fair rent based on current market conditions for their units placed on the HCV Program.
		What is going on with Englewood Manor Area?	AH has completed the public infrastructure planning for the entire site and is awaiting permits from the City of Atlanta in order to begin construction of the public infrastructure. AH has procured developers for the site and anticipates closing on two of five multi-family phases by the end of calendar year 2023. AH plans the two development phases to be Englewood IA, a family rental, and Englewood IB, a senior rental.
		What do you mean by financial closing?	AH uses the phrase "financial closing" to mean that all financial activity is in place and resolved. This includes construction financing, subsidy agreements, tax credit approvals, market unit counts, and other financing vehicles. Shortly after finalizing these considerations, the development project can move to a construction start.
		Are there any plans for Bankhead Courts?	Yes, Bankhead Courts is in an active planning phase in AH's pipeline. However, this development project is further down in the pipeline and AH expects to continue advancing this development through the respective construction stages for a projected FY 2025 or later financial closing.

AH's 2023 STAKEHOLDERS BRIEFINGS AND PUBLIC HEARING SESSIONS			
Meeting / Hearing Date	Stakeholder Group	Public Comment	AH Response / Action
Thursday, February 10, 2022	Jurisdiction Wide Council (JWC)	Can you explain the RAD Program briefly for new residents?	<p>Simply, the assistance program under HUD changes once the community converts under the Rental Assistance Demonstration (RAD) Program. Instead of the public housing community receiving HUD subsidy from public housing coffers, the community receives funding from the housing choice or Section 8 Program.</p> <p>There are other changes under the RAD Program that include the ability for the property to "carry debt" to address maintenance issues. Currently, HUD provides a set amount of capital funding to preserve public housing communities. However, most public housing communities require more funding than allocated by HUD and Public Housing Authorities (PHAs) do not have the ability to "borrow" against the property for big-ticket capital needs.</p> <p>Therefore, once approved public housing communities convert under the RAD Program, the community owner gains the ability to leverage the property's value to raise capital funding to address new and deferred maintenance issues similar to privately owned market rate communities.</p>
		What is AH's responsibility [to residents] after the property becomes a RAD property?	<p>Currently, AH operates its public housing program through management agreements with property-manager developers (PMDs). Once the property converts program subsidy (public housing to housing choice) under RAD, AH sells the property to the PMD entity.</p> <p>After completion of the sale, the primary responsibility to the resident shifts from AH to the new ownership. AH's role then becomes housing assistance payment (HAP) contract administrator and provides program oversight and subsidy payments under the terms and conditions of a HomeFlex Agreement. AH retains a ground lease agreement and may continue resident programs, the property owner's management agent is the point-of-contact.</p>

AH's 2023 STAKEHOLDERS BRIEFINGS AND PUBLIC HEARING SESSIONS			
Meeting / Hearing Date	Stakeholder Group	Public Comment	AH Response / Action
Thursday, February 10, 2022	Jurisdiction Wide Council (JWC)	Is there a list of senior or family housing choices that receives assistance?	AH provided a list of subsidized communities, which AH lists in the MTW Plan under Section II.A. Housing Stock Information. These subsidized communities are overseen by AH's Asset & Property Management business unit, have site-based waiting lists, and separate applications for tenancy at each property.
		Affordable, what does that mean?	AH recognizes that the term "affordable" is relative for each unique household, but overall most define affordable housing as housing in which the low-income resident, as defined by HUD, is paying no more than 30 percent of their adjusted household income for housing costs, including utilities.
		What is Atlanta's AMI?	AMI stands for Area Median Income, which is a measure of residents' median income for every geographic region in the country by using data from the US Census-based American Community Survey calculated and defined by HUD.  HUD publishes AMI tables by locality for each family size annually. AMI tables determine eligibility for a variety of subsidized housing programs. As of April 2021, Atlanta's AMI is \$86,200.
		Is the 301 North Avenue project under development or renovation?	Actually, the 301 North Avenue project is in the due diligence or development stage of construction. At this stage, AH is ensuring that land titles are clear, environmental assessments are clear, historical artifacts are absent and AH has met applicable preservation requirements, as well as any other factors to help ensure that the development of the planned project as intended.
		Is this project [301 North Avenue] next to Cosby Spear?	Yes, this planned project is the vacant land (or lots) next to or near the Cosby Spear Highrise.

AH's 2023 STAKEHOLDERS BRIEFINGS AND PUBLIC HEARING SESSIONS			
Meeting / Hearing Date	Stakeholder Group	Public Comment	AH Response / Action
Thursday, February 10, 2022	Jurisdiction Wide Council (JWC)	What is the status of the Civic Center project?	The Civic Center project has moved forward from the pre-development planning stage to the detailed planning and design construction stage. At this stage, AH is reviewing the parcel(s) to configure a development with parking and green space within the constraints of zoning, applicable historical preservation limits, HUD Total Development Cost Schedule, and other factors that may influence the progress of the development. AH issued a Request for Quote (RFQ) during the summer of 2021, followed by a Request from Proposals (RFPs) from a shortlist of prequalified RFQ respondents to procure a developer for the Civic Center site.
Tuesday, February 15, 2022	Choice Neighborhoods Advisory Board Human Development Services (HDS) Real Estate Sub-Cabinet	What is Home Again?	Home Again is AH's temporary assistance program to help prevent homelessness of families who are at risk of eviction. We work closely with United Way to help families not on a rental assistance program to pay rent, utilities, or other housing costs that may cause them to lose their housing.
		Shocked to see Phoenix Ridge on the list of FY 2023 Construction in Progress.	AH pulls from current and previous pipeline projects that our Board of Commissioners have approved. Planned development projects on this list does not mean that AH will complete construction of the development in FY 2023, but simply informs its stakeholders that AH plans to advance this project through the respective construction stages as able.
Thursday, February 17, 2022	Business and Philanthropy	No Comments Received	AH continues to value and appreciate the collaboration with members of Atlanta's Business and Philanthropy community.
Thursday, February 24, 2022	Public Officials	Why do the programs stop at Vine City versus continuing to Hunter Hills and Dixie Hills that have just as much blight and need?	AH bases its response on the neighborhoods referenced, which presumes that the comment refers to the University Choice Neighborhood (UCN).  While AH recognizes that other areas of the city are in need of revitalization, the grant parameters set the target area. As part of AH's Choice Neighborhoods Implementation Grant, activities or programs can only occur within the area defined in the grant application and associated Neighborhood Transformation Plan. The UCN Transformation Plan covers Ashview Heights, Atlanta University, and Vine City neighborhoods.

AH's 2023 STAKEHOLDERS BRIEFINGS AND PUBLIC HEARING SESSIONS			
Meeting / Hearing Date	Stakeholder Group	Public Comment	AH Response / Action
Thursday, February 24, 2022	Public Officials	What can be done to prevent landlords from denying low-income families with poor credit scores? This has been a roadblock for many of our constituents.	Through the utilization of its MTW flexibilities, AH has been able to recruit and retain property owners onto the Housing Choice Voucher (HCV) Program. One of the primary tools that HCV uses to ease the concern of property owners renting to low-income families with poor credit is its Leasing Incentive Fee activity. Under this activity, AH has the ability to pay security deposits and other out-of-pocket costs, as well as 70% of the rent on the behalf of HCV families that usually prohibit these low-income families from living in high-quality, modernized units.
		Also, how can we help enforce the policy to prevent housing voucher discrimination from landlords?	AH believes that the prevention of voucher discrimination comes in two-fold. One, education. Unfortunately, there is a negative stigma attached to voucher families based on a small percentage of experiences. The majority of HCV families are law-abiding, productive citizens of Atlanta that just do not make enough money to make ends meet. However, the "ratchet" families get all of the attention.  Two, legal. About 5% of HCV families cause the negative connotation among HCV housing partners and they refuse to rent to these families in order to protect their investment. AH feels that in addition to education, local ordinances or state law may be appropriate for property owners with a certain size portfolio. Another solution may include the requirement of new developments to include units for families at the 60% to 120% of AMI.
		Has there been any exploration in wrapping the renter in services through some of the nonprofits that work in the financial literacy space?	AH has a vast network of third-party service providers that can provide wrap-around services to renters under each program. Many, if not all, of the program services are contracted with local non-profits. The services address all quality of life facets, such as getting or increasing physical activity, maintaining or improving nutritional knowledge, preparing for homeownership, gaining or improving financial literacy, preparing for jobs through upskilling, increasing education, or building soft skills proven to help families achieve self-sufficiency.

AH's 2023 STAKEHOLDERS BRIEFINGS AND PUBLIC HEARING SESSIONS			
Meeting / Hearing Date	Stakeholder Group	Public Comment	AH Response / Action
Tuesday, March 1, 2022	Public Hearing	Will people that used to live in a previous development have the ability to return once the developments are completed?	<p>Eligible former residents of a public housing site undergoing revitalization have first right of return priority to the redeveloped site. AH staffs a team to assist residents who desire to return to the site during the re-occupancy phase of the site.</p> <p>Under each rehabilitation scenario, AH does engage in "right sizing" residents to their unit need and does not guarantee that returning residents will return to the same unit since situations may have changed since the original move-in or transfer date.</p> <p>Nonetheless, AH makes every effort to maintain contact with or locate former residents to afford them the opportunity of first refusal to return to the rehabilitated property.</p>
		How can non-participants apply for programs and [what are the] qualifications for programs?	<p>AH administers several rental assistance programs and oversees programs focused on economic independence and housing self-sufficiency.</p> <p>AH's response is under general terms since specifics of the individual are unknown. Prospective residents or non-participants can apply for rental assistance programs in whichever community they are interested in residing. Each community, including AH public housing communities, have a site-based waiting list. As of this response, AH's HCV Program is closed and not accepting any applications. However, whenever this program accepts new applications, it is for a specific time and slots fill quickly.</p> <p>Interested parties must meet income eligibility based on their family size, as well as clear background checks that may include a review of debts owed to other housing authorities, satisfactory rental history, criminal activity, etc. Further, AH utilizes a residency preference and work requirement or active participation in education or job training activities to prioritize low-income Atlantans.</p> <p>Activities specifically designed for or funded for program participants are not open to the community; however, AH welcomes non-participants to participate in regularly held community wide activities sponsored by or supported by AH.</p>



AH's 2023 STAKEHOLDERS BRIEFINGS AND PUBLIC HEARING SESSIONS			
Meeting / Hearing Date	Stakeholder Group	Public Comment	AH Response / Action
Tuesday, March 1, 2022	Public Hearing	Is it easier or better to find a place that takes vouchers or wait until I get the voucher?	<p>AH submits that this decision can be puzzling and therefore provides a response based on the voucher type.</p> <p>If this is a new voucher issuance, AH would recommend that family complete the issuance process– make sure you have a voucher before beginning a unit search.</p> <p>If the voucher type is an existing voucher and the family is looking to move, AH would recommend that the family begin searching for property owners that accept vouchers before making a final decision to move out of their current unit. AH is located in a tight real estate market and finding units is an ongoing challenge for all renters and buyers looking to live in Atlanta. Once the family has identified a property owner that accepts the voucher, AH encourages you to submit your paperwork to the property owner and necessary deposits to hold the unit as you prepare to move.</p>
		How do interested parties tap into the resources managed by third parties?	<p>AH engages in third party contracting of its resources, which includes management of its public housing communities and satellite units, as well as services offered to program participants.</p> <p>With regard to housing, AH directs interested parties to visit the community of interest because all communities affiliated with AH administer a site-based waiting list system except for AH's HCV Program, which is global and currently closed. AH cautions prospective residents to note that some communities exclusively serve specific population groups for eligibility.</p> <p>Other AH resources managed by a third party include economic independence and housing self-sufficiency activities specifically designed for or funded for current program participants.</p> <p>Nevertheless, AH welcomes interested parties to join us in community-wide events open to both program participants and our community neighbors.</p>

AH's 2023 STAKEHOLDERS BRIEFINGS AND PUBLIC HEARING SESSIONS			
Meeting / Hearing Date	Stakeholder Group	Public Comment	AH Response / Action
Tuesday, March 1, 2022	Public Hearing	How do people access services when people [are] in need?	<p>AH interprets this comment as an emergency housing request. Therefore, AH shares that its primary mission houses eligible families long-term (60+ months). Because of this focus, individuals and families must go through the process to determine their eligibility for rental assistance. Unfortunately, the process is timely, which includes time on the waiting list for a voucher or unit to become free.</p> <p>For people that need instant services, AH cautions there are very few program partners that engage in this type of assistance have limited and competitive resources reserved for the neediest cases in the city. AH bases its referrals on that program's eligibility parameters.</p>
		Does the Project-Based Rental Assistance (PBRA) Plan include Forest Cove?	Forest Cove is not in AH's management portfolio. Forest Cove actually falls under a direct PBRA agreement between the city and HUD. AH's current understanding is HUD directs the PBRA contract and there is an open negotiation between the City of Atlanta and HUD.
		[Is] there anything done to landlords [for] not keeping up their properties? Landlords are not receiving payments.	<p>Yes, AH has the ability to enforce penalties whenever AH discovers property owners are not meeting their obligations under the Housing Assistance Payment (HAP) Contract. There are a variety of tools at AH's disposal, including withholding rent, known as abatement.</p> <p>Based on the description, it appears that AH is exercising the abatement option. However, it is important to know that the assisted family plays a significant role in the upkeep of the property. In instances where the family is responsible for damages to the unit, AH can hold the family accountable.</p> <p>In the meantime, AH hopes that the abatement tool will help property owners return to Housing Quality Standards (HQS) compliance. If after a period of abatement without improvement, AH may terminate the contract.</p>

AH's 2023 STAKEHOLDERS BRIEFINGS AND PUBLIC HEARING SESSIONS			
Meeting / Hearing Date	Stakeholder Group	Public Comment	AH Response / Action
Tuesday, March 1, 2022	Public Hearing	Housing list sent to schools is dated and HCV families have limited options.	<p>AH appreciates the information and will work more intentionally to provide updated information; however, AH acknowledges that changes in ownership and business models can and do occur without our knowledge.</p> <p>Because of this possibility, AH reminds assisted families that AH's list should not be the sole resource to help a family to meet their housing needs. AH strongly encourages HCV families to work closely with their Housing Counselors and Housing Service Administrators to locate affordable, efficient-friendly housing.</p> <p>Further, AH continues to remind assisted families that they can help to recruit property owners onto the program by presenting a strong case to property owner about their rental history and ability to pay, as well as the benefits of them bringing their unit onto the HCV Program. AH stands ready to help these families close the deal as AH understands that families may come across opportunities during their search that AH does not.</p> <p>In all cases, assisted families and housing advocates must understand the importance of intentional education about the program and themselves to help us overcome the negative stigma challenges attached to low-income rental programs, whether it be public housing, tax credit properties, Section 8, or other programs.</p>

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

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Elements of Legacy Attachment B  
AH's MTW Program Benchmarking Data

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ELEMENT I. HOUSEHOLDS SERVED

Planned Households - By Unit Size

Community & Program Type	FY 2022 Households by Unit Size					
	0/1 BRs	2 BRs	3 BRs	4 BRs	5+ BRs	Total*
AH-Owned	1,033	44	20	29	0	1,126
MIXED	1,472	1,515	565	41	0	3,593
RAD PBV Conversions	659	1	0	0	0	660
HomeFlex	3,042	1,418	212	5	0	4,677
Housing Choice: Tenant-Based	2,503	3,450	2,769	926	0	9,648
Housing Choice: Ports	1,779	0	0	0	0	1,779
<b>Totals:</b>	<b>10,488</b>	<b>6,428</b>	<b>3,566</b>	<b>1,001</b>	<b>0</b>	<b>21,483</b>

\*Total excludes local, non-traditional households and other households that AH does not have direct access to demographics.

## Appendix C: Elements of Legacy Attachment B

### Planned Households - By Family Size

Community & Program Type	FY 2022 Households by Family Size					
	1 Member	2 Member	3 Member	4 Member	5+ Member	Total*
AH-Owned	1,005	69	14	12	26	1,126
MIXED	1,903	780	502	249	159	3,593
RAD PBV Conversions	629	31	0	0	0	660
HomeFlex	3,404	862	255	102	54	4,677
Housing Choice: Tenant-Based	3,101	2,386	1,832	1,194	1,135	9,648
Housing Choice: Ports	359	311	338	380	391	1,779
<b>Totals:</b>	<b>10,401</b>	<b>4,439</b>	<b>2,941</b>	<b>1,937</b>	<b>1,765</b>	<b>21,483</b>

*\*Total excludes local, non-traditional households and other households that AH does not have direct access to demographics.*

## Appendix C: Elements of Legacy Attachment B

### Planned Households - By Income Group

Community & Program Type	FY 2022 Households by Family Size				
	≤30%	31 - 50%	51 - 80%	≥80%	Total*
AH-Owned	1,020	91	11	4	1,126
MIXED	2,579	783	210	21	3,593
RAD PBV Conversions	592	66	2	0	660
HomeFlex	3,717	842	115	3	4,677
Housing Choice: Tenant-Based	6,907	2,129	568	44	9,648
Housing Choice: Ports	1,779	0	0	0	1,779
<b>Totals:</b>	<b>16,594</b>	<b>3,911</b>	<b>906</b>	<b>72</b>	<b>21,483</b>

*\*Total excludes local, non-traditional households and other households that AH does not have direct access to demographics.*

## Appendix C: Elements of Legacy Attachment B

### Planned Households - By Race and Ethnicity

Community & Program Type	FY 2022 Households by Family Size					
	African American	Caucasian	Native American	Asian	Pacific Islander	Total
AH-Owned	892	123	2	106	3	1,126
MIXED	3,570	18	4	1	0	3,593
RAD PBV Conversions	506	109	0	42	3	660
HomeFlex	4,389	233	6	41	8	4,677
Housing Choice: Tenant-Based	9,534	94	17	2	1	9,648
Housing Choice: Ports	1,761	12	4	2	0	1,779
<b>Totals:</b>	<b>20,652</b>	<b>589</b>	<b>33</b>	<b>194</b>	<b>15</b>	<b>21,483</b>

*\*Total excludes local, non-traditional households and other households that AH does not have direct access to demographics.*

## Appendix C: Elements of Legacy Attachment B

### Planned Households - By Program/Housing Type and End-of-Year (EOY)

		Household Served Totals				
Community & Program Type	Assistance Type^	FY 2019 Actual	FY 2020 Actual	FY 2021 Actual	FY 2022 EOY Projection	FY 2023 EOY Projection
AH-Owned	PH	1,586	1,261	1,261	1,261	798
MIXED	PH	2,155	1,562	1,562	1,562	1,452
	RAD PBV	423	1,503	1,503	1,340	1,913
	HF	1,509	1,358	1,358	1,521	1,521
	LIHTC	1,084	1,088	1,088	1,081	1,081
HomeFlex	HF	4,230	4,803	4,803	4,841	4,997
	LIHTC	1,589	1,585	1,585	1,588	1,588
Housing Choice: Tenant-Based	HCV	9,094	9,393	9,393	9,597	9,597
Housing Choice: Ports	HCV	1,860	1,711	1,711	1,745	1,745
Housing Choice: Homeownership	HCV	19	18	18	17	17
Homeownership - Other	DPA	993	1,225	1,457	1,659	1,930
Short-Term Housing Assistance	MTW	380	244	246	295	295
<b>Totals:</b>		<b>24,922</b>	<b>25,751</b>	<b>25,985</b>	<b>26,507</b>	<b>26,934</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

### 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 our 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 35** 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 planned performance of its MTW Program Benchmarks, please **see page 120** of this document. Further, AH plans to revisit these benchmarks during the fiscal year to update the measurable outcomes as appropriate.

#### A. Security

AH continues to address crime and safety in its wholly owned communities and in other communities where assisted residents are in third-party owned properties, 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 and third-party owner communities may include:

- 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.
- Security protocols advanced by third-party owners

### ELEMENT VIII. MANAGEMENT INFORMATION FOR LEASED HOUSING

#### A. 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.



### 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 concerns 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 concerns 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 AH-owned 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 concerns, identify process improvements, and identify topics for staff training.

#### **AH Reviews of Mixed and HomeFlex 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 and HomeFlex Communities:

- (1) **Business Process Reviews (BPRs):** AH conducts an annual Business Process Review at all mixed-income and HomeFlex 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 business 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 planning period.

### MTW PROGRAM BENCHMARKS

AH captures outcome details of this element in its MTW Annual Report.

Measurable Outcome	MTW Program Benchmarks					
	Baseline	FY 2023	FY 2024	FY 2025	FY 2026	FY 2027
<b>Public Housing Program</b>						
• % Rents Uncollected	2%	≤ 2%	≤ 2%	≤ 2%	≤ 2%	≤ 2%
• Occupancy Rate	98%	≥ 98%	≥ 98%	≥ 98%	≥ 98%	≥ 98%
• Emergency Work Orders Completed or Abated in < 24 hours	99%	≥ 99%	≥ 99%	≥ 99%	≥ 99%	≥ 99%
• Routine Work Orders Completed in < 30 Days	5 Days	100%	100%	100%	100%	100%
• % Planned Inspections Completed	100%	100%	100%	100%	100%	100%
<b>Housing Choice Program (Section 8)</b>						
• Budget Utilization Rate	98%	≥ 98%	≥ 98%	≥ 98%	≥ 98%	≥ 98%
• % Planned Annual Inspections Completed	98%	≥ 98%	≥ 98%	≥ 98%	≥ 98%	≥ 98%
• Quality Control Inspections	≥ 1.4%	≥ 1.4%	≥ 1.4%	≥ 1.4%	≥ 1.4%	≥ 1.4%
<b>Community and Support Services</b>						
• Resident Homeownership	6	3	4	6	7	9
• Resident Workforce Participation	6,415	8,576	8,581	8,586	8,591	8,595
<b>Finance</b>						
• Project-Based Financing Closings	N/A	11	6	6	6	6

## Appendix D: Lobbying Disclosure

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Form 50071 or SF-LLL as applicable

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### Certification of Payments to Influence Federal Transactions

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

Applicant Name

The 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-LLL, 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 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

Eugene E. Jones, Jr.

Title

President and Chief Executive Officer

Signature



Date (mm/dd/yyyy)

03/11/2022

Previous edition is obsolete

form HUD 50071 (3/98)  
ref. Handbooks 7417.1, 7475.13, 7485.1, & 7485.3

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## Appendix E: Other Information

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Local Asset Management Plan (LAMP)  
Planned Disposition/Demolition Applications  
RAD Unit Conversion Details  
COVID-19 Waivers

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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.

### **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, and
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., and
13. Other development and revitalization expenditures.

## Appendix E: 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, and
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: Planned Disposition/Demolition Applications

Special Applications Center (SAC) Submissions			
Property/Parcel Name*	Proposed Action	Property/Parcel Name*	Proposed Action
Ashley Scholars Landing – Phase II	Disposition	Juanita Gardner (f.k.a. Harmony at Bakers Ferry)	Disposition
Bankhead Courts	Disposition	Leila Valley	Disposition
Bowen Homes	Disposition	Magnolia Perimeter ANDP	Disposition
Civic Center	Disposition	Magnolia Perimeter Citiplace	Disposition
Cupola Building at Centennial	Disposition	Magnolia Perimeter Quest/Westside Future Fund	Disposition
Englewood IA	Disposition	Mechanicsville Homeownership	Disposition
Englewood IB	Disposition	North Avenue (a.k.a. SoNo 301)	Disposition
Englewood IC	Disposition	Palmer House	Disposition
Englewood IIA	Disposition	Quarry Park/Johnson Road	Demolition
Englewood IIB	Disposition	University Homes (offsite)	Disposition
Englewood IIC	Disposition	Scholars Landing Homeownership – Phase V	Disposition
Englewood Storm Water	Disposition	Vacant Lots (various): Capitol, Carver, Grady, and Harris	Disposition
Gilbert Gardens Annex	Disposition	Village at Carver I	RAD Section 18 Disposition
Heritage Village at West Lake	Disposition	Villages at Castleberry II	RAD Section 18 Disposition
Hollywood Courts	Disposition	West Highlands – 2000 Perry	Disposition
Jonesboro North	Disposition	West Highlands – 3B South	Disposition
Jonesboro South	Disposition	West Highlands – WACs (7acs of Perry Homes)	Disposition

*\*Order listed alphabetically, not by priority or time.*

In addition, AH may seek to acquire parcels under its co-investment program that complement its revitalization activities. These acquisitions may require disposition under a long-term ground lease to the development partnership.

## Appendix E: Planned Disposition/Demolition Applications

<b>Additional Special Applications Center ("SAC") Submissions</b> <b>Re: Grady Redevelopment, et al. Judicial Order - Vacant Parcel Dispositions</b>					
Tax ID Number*	Street Address/Lot Description	Community	On-Site/ Off-Site	Proposed Action	Acreage**
<b>CAPITOL - On-site and Off-site (a/k/a "Further Leveraged Property") Vacant Parcels</b>					
14-0044-0001-022-2	381 Memorial Drive	Capitol	Off-Site	Disposition	0.1101
14-0044-0001-023-0	303 Oakland Avenue	Capitol	Off-Site	Disposition	0.1205
14-0044-0001-024-8	0 Oakland Avenue	Capitol	Off-Site	Disposition	0.0603
14-0044-0001-016-4	341 Memorial Drive	Capitol	Off-Site	Disposition	0.1722
14-0044-0001-109-7	0 Memorial Drive	Capitol	Off-Site	Disposition	0.3099
14-0044-0001-108-9	359 Memorial Drive	Capitol	Off-Site	Disposition	0.1561
14-0044-0001-101-4	361 Memorial Drive	Capitol	Off-Site	Disposition	0.4121
14-0044-0001-099-0	363 Memorial Drive	Capitol	Off-Site	Disposition	0.3053
14-0046-0010-141-7	333 Auburn Ave	Capitol	Off-Site	Disposition	0.202
14-0046-0010-197-9	333 Auburn Ave	Capitol	Off-Site	Disposition	0.0367
14-0046-0010-140-9	0 Auburn Ave	Capitol	Off-Site	Disposition	0.1225
14-0053-0001-103-8	Entire Tax Parcel ID less and except any street dedicated to the public (see Exhibit C-1)	Capitol	On-Site	Disposition	3.0881
14-0053-0001-103-8	Entire Tax Parcel ID less and except any street dedicated to the public (see Exhibit C-1)	Capitol	On-Site	Disposition	2.5321
14-0053-0002-066-6		Capitol	On-Site	Disposition	2.6835
<b>GRADY - On-site and Off-site (a/k/a "Further Leveraged Property") Vacant Parcels</b>					
14-0045-0006-037-4	380 Decatur Street	Grady	Off-Site	Disposition	0.249
14-0045-0001-029-6	0 Wm Holmes Borders	Grady	Off-Site	Disposition	1.3935
14-0045-LL-475-3		Grady	On-Site	Disposition	2.118
14-0045-0006-036-6		Grady	On-Site	Disposition	2.2526
<b>HARRIS - On-site and Off-site (a/k/a "Further Leveraged Property") Vacant Parcels</b>					
(1) 14-0117-0003-068-5	Multiple Parcels: west of Joseph E. Lowery, north of Sells, east of Abbot and south of Westview	Harris	On-Site	Disposition	4.0005
(2) 14-0117-0003-017-2					
(3) 14-0117-0003-055-2					
(4) 14-0117-0003-002-4					
(5) 14-0117-0003-003-2					
(6) 14-0117-0003-004-0					
(7) 14-0117-0003-064-4					
(8) 14-0117-0003-007-3					
(9) 14-0117-0003-008-1					
(10) 14-0117-0003-009-9					
(11) 14-0117-0003-010-7					
(12) 14-0117-0003-054-5					
(13) 14-0117-0003-013-1					

## Appendix E: Planned Disposition/Demolition Applications

Tax ID Number*	Street Address/Lot Description	Community	On-Site/ Off-Site	Proposed Action	Acreage**
14-0117-0003-069-3	Described as Phase IV (South of Sells Ave.) as shown on the Seiler Survey (in AH's files)	Harris	On-Site	Disposition	0.1853
14-0117-0003-069-3	Described as Phase IV (South of Sells Ave.) as shown on the Seiler Survey (in AH's files)	Harris	On-Site	Disposition	0.8261
14-0117-0003-069-3	Described as Phases VIII and XI as shown on the Seiler Survey (in AH's files)	Harris	On-Site	Disposition	2.988
14-0117-LL-001-0	406 Lawton Street	Harris	Off-Site	Disposition	1.4576
<b>CARVER - On-site and Off-site (a/k/a "Further Leveraged Property") Vacant Parcels</b>					
14-0072-LL-042-7		Carver	On-Site	Disposition	3.6737
14-0072-LL-038-5		Carver	On-Site	Disposition	2.9441
14-0072-LL-040-1		Carver	On-Site	Disposition	14.8331
14-0072-0002-010-1	1543-1549 S Pryor Road	Carver	Off-Site	Disposition	1.5000
14-0072-0002-033-3	1543-1549 S Pryor Road	Carver	Off-Site	Disposition	1.7840
14-0072-0002-023-4	1531 Pryor Road S.W.	Carver	Off-Site	Disposition	0.3480
14-0072-0002-012-7	1623 Pryor Road	Carver	Off-Site	Disposition	0.3440
14-0072-0002-032-5	0 Arthur J. Langford Road	Carver	Off-Site	Disposition	0.3440
14-0072-0002-007-7	1569 Pryor Road, SW	Carver	Off-Site	Disposition	0.5300
14-0072-0002-008-5	1599 Pryor Road, SW	Carver	Off-Site	Disposition	0.4330
14-0072-0002-031-7	0 Pryor Road, SW	Carver	Off-Site	Disposition	0.1140
<b>CAPITOL DEDICATED PARK PARCEL [On-site and Off-site (a/k/a "Further Leveraged Property") Vacant Parcels]</b>					
14-0052-0008-034-9		Capitol	On-Site	Disposition	4.4072
14-0052-0008-040-6		Capitol	On-Site	Disposition	2.5681
<b>Total</b>					<b>59.6052</b>

### Notes:

\*Tax parcel ID numbers are as of February 2022 and are subject to potential modification by Tax Commissioner/Tax Assessor.

\*\*Acreage subject to final ALTA surveys.

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## Appendix E: RAD Unit Conversion Details

### PLANNED RAD CONVERSIONS

Name	PIC Dev ID	Conversion Type	Transfer of Assistance / RAD Section 18 Blend
Cosby Spear	GA006000241	PBV	No/No
<b>Total Units</b>	<b>Pre-RAD Unit Type</b>	<b>Post-RAD Unit Type</b>	<b>Capital Fund Allocation</b>
282	Near Elderly, Elderly and Non-Elderly Disabled	Near Elderly, Elderly and Non-Elderly Disabled	\$669,467
<b>Bedroom Type:</b>	<b>Number of Units Pre-Conversion</b>	<b>Number of Units Post Conversion</b>	<b>Change in Number of Units</b>
<b>Studio</b>	166	166	No change
<b>One Bedroom</b>	114	114	No change
<b>Two Bedroom</b>	2	2	No change

Name	PIC Dev ID	Conversion Type	Transfer of Assistance / RAD Section 18 Blend
East Lake Highrise	GA006000300	PBV	No/No
<b>Total Units</b>	<b>Pre-RAD Unit Type</b>	<b>Post-RAD Unit Type</b>	<b>Capital Fund Allocation</b>
149	Near Elderly, Elderly and Non-Elderly Disabled	Near Elderly, Elderly and Non-Elderly Disabled	\$354,692
<b>Bedroom Type:</b>	<b>Number of Units Pre-Conversion</b>	<b>Number of Units Post Conversion</b>	<b>Change in Number of Units</b>
<b>Studio</b>	88	88	No change
<b>One Bedroom*</b>	61	61	No change

\* A current unit Out of Occupancy (UOO) will continue to remain a common area and serve as a computer lab.  
This unit is not included in the unit count above for either pre or post-RAD

Name	PIC Dev ID	Conversion Type	Transfer of Assistance / RAD Section 18 Blend
Westminster	GA006000440	PBV	No/No
<b>Total Units</b>	<b>Pre-RAD Unit Type</b>	<b>Post-RAD Unit Type</b>	<b>Capital Fund Allocation</b>
32	Family	Family	\$90,259
<b>Bedroom Type:</b>	<b>Number of Units Pre-Conversion</b>	<b>Number of Units Post Conversion</b>	<b>Change in Number of Units</b>
<b>One Bedroom</b>	2	2	No change
<b>Two Bedroom</b>	30	30	No change

Name	PIC Dev ID	Conversion Type	Transfer of Assistance / RAD Section 18 Blend
Villages at Carver I	GA006000850	PBV	No/Yes
<b>Total Units</b>	<b>Pre-RAD Unit Type</b>	<b>Post-RAD Unit Type</b>	<b>Capital Fund Allocation</b>
110	Mixed Income Family	Mixed Income Family	\$168,339
<b>Bedroom Type:</b>	<b>Number of Units Pre-Conversion</b>	<b>Number of Units Post Conversion</b>	<b>Change in Number of Units</b>
<b>One Bedroom</b>	24	24	No change
<b>Two Bedroom</b>	54	54	No change
<b>Three Bedroom</b>	30	30	No change
<b>Four Bedroom</b>	2	2	No change

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## Appendix E: COVID-19 Waivers

During FY 2022, AH joined other PHAs in petitioning HUD to extend many expiring COVID-19 Waivers so that COVID-19 parameters and protocols could remain in place. Based on the current outlook, **AH expects to continue operating under some limitations in FY 2023**. Therefore, AH expects to administer COVID-19 Waivers as approved or extended by HUD and prepares its FY 2023 MTW Annual Plan anticipating some form of COVID-19 parameters and protocols will influence AH operations during FY 2023.