



ASHLEY @ SCHOLAR'S LANDING

FY 2022

MOVING - TO - WORK (MTW)

ANNUAL PLAN

Board Adopted: March 24, 2021
HUD Submission: April 13, 2021
HUD Resubmission: July 16, 2021
HUD Second Resubmission: September 23, 2021
HUD Approval: September 29, 2021



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, DC 20410-5000

OFFICE OF PUBLIC AND INDIAN HOUSING

September 29, 2021

Eugene Jones, Jr.
President and Chief Executive Officer
Atlanta Housing
230 John Wesley Dobbs Avenue
Atlanta, GA 30303-2429

Subject: HUD Approval of Atlanta Housing's FY 2022 Annual Moving to Work Plan

Dear Mr. Jones:

The Department of Housing and Urban Development has completed its review of Atlanta Housing's (AH) Annual Moving to Work (MTW) Plan for FY 2022, which was initially submitted on April 13, 2021, and resubmitted, per HUD's comments on July 16, 2021, and September 22, 2021. This letter provides HUD's approval of AH's FY 2022 Annual MTW Plan, as submitted on September 23, 2021.

The Department's approval of this Annual MTW Plan is limited to approval of policies and actions authorized by the 1937 Act and flexibilities waiving provisions of the 1937 Act authorized by the MTW Agreement, including local non-traditional activities in compliance with PIH Notice 2011-45. In providing assistance to families under programs covered by this Plan, AH must comply with the rules, standards, and policies established in the Plan as well as all applicable federal requirements other than those provisions of the 1937 Act waived by the MTW Agreement. As mutually agreed upon by HUD and AH, Belinda Bly will continue to act as AH's HUD single point of contact per AH's MTW Agreement. The Department's approval, therefore, also requires continued adherence to ongoing guidance from Belinda Bly.

Documents relying upon the approved Plan (i.e., Administrative Plan, Admission and Continued Occupancy Plan, etc.) should be updated to reflect Plan policies. Also, the approved Plan and all required attachments and documents should be available for review and inspection at AH's principal office during normal business hours.

If you have any questions, please contact Belinda Bly, your HUD single point of contact, or Alison Christensen, your MTW Coordinator.

Sincerely,

A handwritten signature in blue ink, appearing to read "Marianne Nazzaro".

Marianne Nazzaro
Moving to Work Program Director
Office of Public Housing Investments

CC: Robert Kenner, Atlanta Regional Office
Belinda Bly, Urban Revitalization Division

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Moving-to-Work Since 2003

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Karen Young, *Communications, Marketing, and Public Engagement*

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

-Vincent G. Taylor and M. Elaine Mobley
AH's MTW Team

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I. INTRODUCTION: OVERVIEW OF GOALS AND OBJECTIVES

Introduction

The City of Atlanta and the surrounding area rank in the top 10 fastest growing cities and metropolitan areas in the country and among the top 40 cities by population. Atlanta Housing's (AH) service jurisdiction includes the city of Atlanta and extends beyond city boundaries into the metropolitan area. Atlanta's rapid and sustained population growth has outstripped housing production for several years in a row, increasing the complexity and severity of housing affordability in the region. However, AH's Moving-to-Work (MTW) designation¹ has been a critical tool in responding effectively to the twin challenges of rapid growth and increasing market rents.

The MTW Program is a demonstration program that permits selected public housing authorities/agencies² (PHAs) to waive certain Public Housing (PH) and Housing Choice Voucher (HCV) program rules and regulations found in the United States Housing Act of 1937 (Housing Act or the Act) in pursuit of local solutions to local challenges. AH pursues these solutions in alignment with the three **MTW Statutory Objectives**:

- Reduce cost and achieve greater cost effectiveness in Federal expenditures;
- Give incentives to families with children where the head of household is working, is seeking work, or is preparing for work by participating in job training, educational programs, or programs that assist people to obtain employment and become economically self-sufficient; and
- Increase housing choices for low-income families.

A Look Ahead to FY 2022

In FY 2022, AH will prioritize the following:

- **Create and preserve affordable housing units** through new construction, significant rehabilitation, substantial modernization, tenant-based voucher (TBV) issuance/renewal, new/renewed HomeFlex Assistance Payment (HFAP) Agreements, and new down payment assistance (DPA) awards.
- **Increase or maintain an acceptable voucher utilization rate** through the issuance and lease-ups of TBVs and the assignment and lease-up of HomeFlex (AH's project-base assistance program) agreements. AH plans to reach 90% voucher utilization by the end of FY 2022.
- **Increase the number of new households served** by leasing up newly completed construction projects, issuing and leasing new TBVs, assigning and leasing up new HFAPs, and awarding DPA to eligible first time homebuyers.
- **Increase or maintain an acceptable work/program compliance rate** by assisting non-compliant families in retaining employment or returning to the workforce after an extended period of unemployment.

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

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

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

² There are only 39 MTW PHAs nationwide and AH was selected in 2003.

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

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

AH possesses the authority, by agreement, to modify PH and HCV program rules and regulations, AH must use the MTW Plan to inform HUD of such plans to utilize MTW Authorizations to create activities, as discussed in Section III. Proposed MTW Activities: HUD Approval Requested. Those activities include:

- SH.2022.01 - Choice Neighborhoods (CN) Down Payment Assistance (DPA) Program.

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

- Activating an Annual Contributions Contract (ACC) Public Housing under the Faircloth Limits.
- Designing a program that allows ACCESS graduates a "stabilization" period prior to program termination.

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

The Impact of COVID-19

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

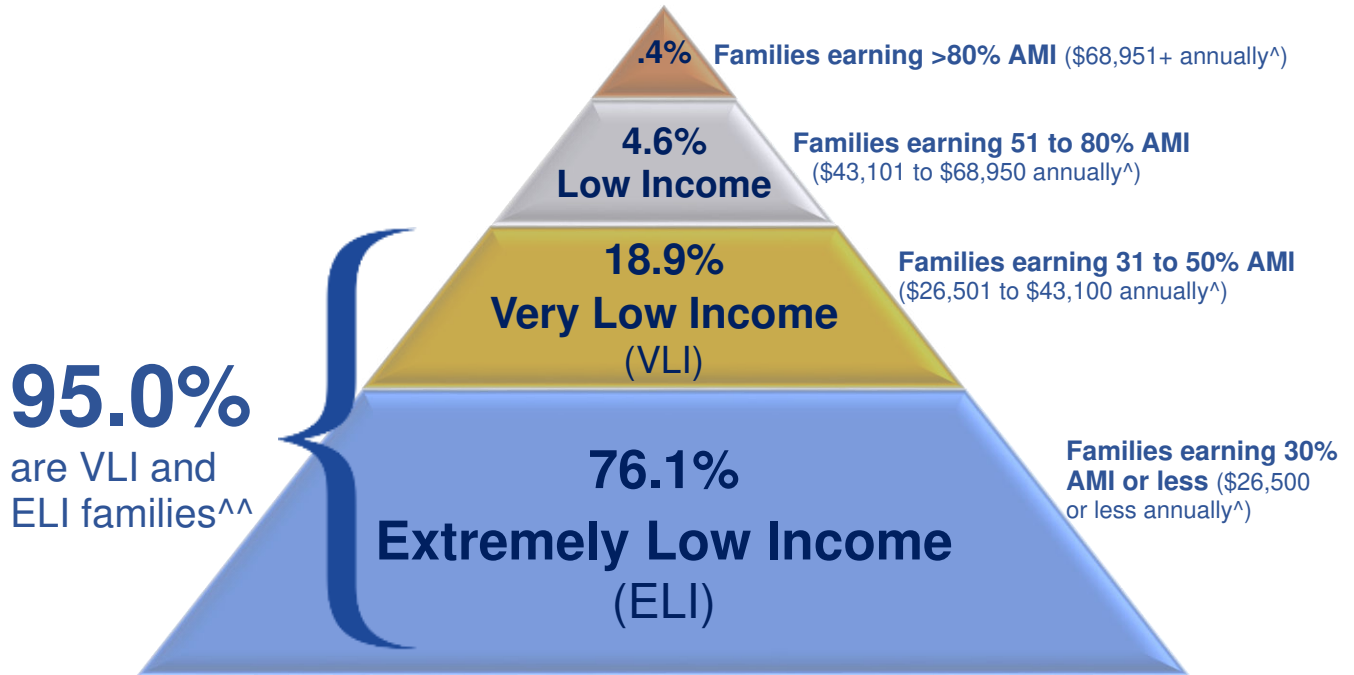
However, because COVID-19 Waivers are set to expire during the first half of AH's fiscal year⁴ and AH anticipates COVID-19 parameters and protocols to remain in place through the end of the calendar year (2021), AH expects to continue business under COVID-19 parameters and protocols in FY 2022. Therefore, **AH prepares its FY 2022 MTW Annual Plan under the assumption that COVID-19 will continue to influence AH operations** during FY 2022. AH does not anticipate the need to postpone new program introductions because of COVID-19, but if delays are required, AH will document such delays in its MTW Report as applicable.

³ Outlined in Notice PIH 2020-05

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

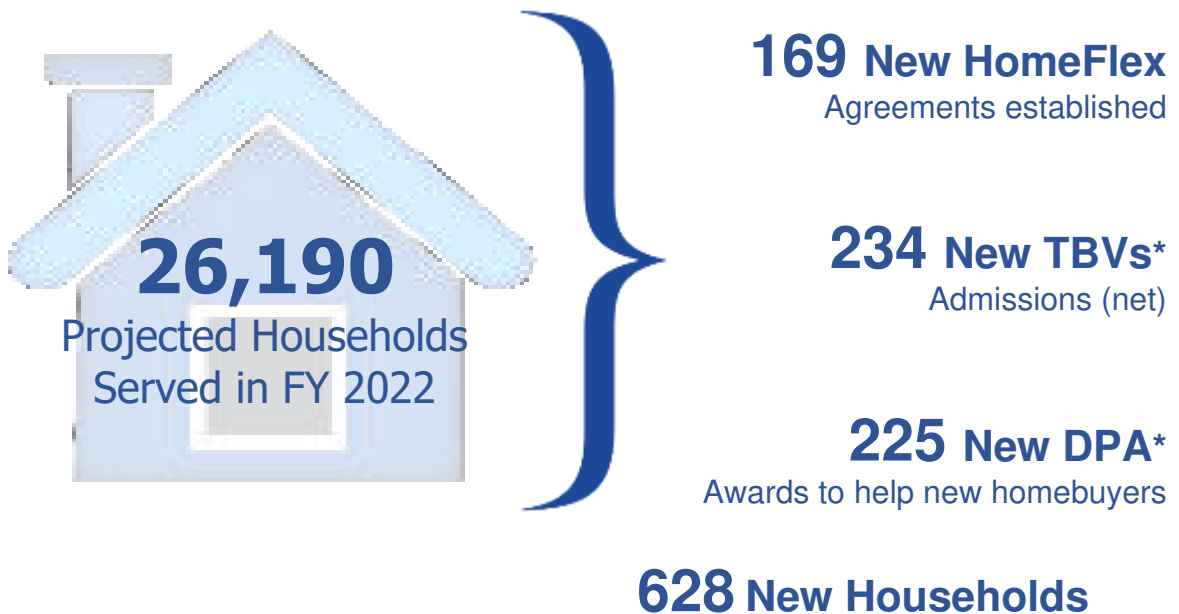
2022 Highlights and Program Statistics

Projected Breakdown of Assisted Households by Unit Category[^]



[^]Source: HUD Income Limits approved April 2021 and based on a Family of Four. ^{^^}Source: Data Reporting and Analysis.

Projected Net New Households



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

AH Team Overview and Highlights – Operational Teams

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

ASSET & PROPERTY MANAGEMENT (APM)

Brief Description of Business Unit:

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

Through APM, AH works closely with Property Management Developers (PMDs) to focus on operational and compliance matters such as occupancy, rent collection rates, 50058 submissions, financial statement reviews, utility administration, resident concerns, and similar operational functions. The portfolio consists of 9 AH-Owned communities and 37 **mixed-income** properties⁵. AH's mixed-income portfolio increases each year as AH completes projects in its real estate development pipeline.

AH has used the **RAD Program** to recapitalize its public housing communities by converting those communities (more than 1,300 units) to long-term, Section 8 project-based assistance. Further, AH may partially dispose of conversion projects and replace affected units with project-based vouchers (PBVs) by utilizing RAD Section 18 elements. AH's Construction and Facilities Management team (please see page 16) oversees capital improvement projects, facilities maintenance, and communities that need substantial rehabilitation or significant modernization to meet contractual compliance or current RAD requirements.

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

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

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

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

FY 2022 Highlights:

- Add affordable housing units by creating 169 new HomeFlex units to add to the more than 8,000 project-based rental assistance units already created under the HomeFlex Program.
- Preserve the affordability of 932 existing HomeFlex units through the renewal of existing HomeFlex Assistance Payment Agreements.
- Continue to preserve the affordability of units through the conversion of 431 public housing units to long-term Section 8 project-based voucher (PBV) assistance under HUD’s Rental Assistance Demonstration (RAD) Program.
- Plan to convert AH’s remaining public housing stock pursuant to its RAD conversion schedule.
- Implement a biennial inspection schedule.
- Continue conducting virtual HomeFlex inspections under COVID-19 parameters.
- Prioritize development of projects on AH vacant land through Notice of Funding Availability (NOFA) issuance(s).

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

CHOICE NEIGHBORHOODS

Brief Description of Business Unit:

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



FY 2022 Highlights:

Housing

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

People

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

Neighborhoods

- Continue revitalization activities in the UCN that include acquisition of blighted and deteriorated properties for future single-family home development.
- Provide exterior home repairs and façade improvement assistance to legacy homeowners.
- Complete the rehabilitation of the historic Roosevelt Hall building as a vibrant community facility.
- Design and implement a CN homebuyer Down Payment Assistance (DPA) Program that provides up to \$60,000 in deferred loans to eligible persons with incomes up to 80% of the Area Median Income (AMI), adjusted for family size. This DPA program is exclusive to new home purchases at the Scholars Landing site and within the UCN.
- Invest funds from multiple sources, such as CNIG, MTW Funds, program income, CDBG and non-federal funds in the delivery of its services and transformation of the UCN via its Housing, People, and Neighborhoods mantra.

HOUSING CHOICE VOUCHER (HCV) PROGRAM

Brief Description of Business Unit:

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

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

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

Further, because AH is converting its public housing units to long-term Section 8 PBV assistance under the RAD Program, AH elected to use the alternate Choice Mobility option under the RAD requirements. Under this option, AH can cap its commitment turnover TBVs for RAD PBV families at three-quarters. AH utilizes a percentage cap that increases annually to estimate the number of turnover PBVs that it will need for RAD PBV families meeting the occupancy requirement. AH communicated this estimation tool with the Office of Recapitalization. In addition, AH created a separate waiting list for RAD PBV families to ensure uniformity and fairness among issuance of turnover TBVs. Without the ability to cap turnover TBVs, AH would not be able to serve families on the traditional HCV waiting list with turnover TBVs.

FY 2022 Highlights:

- Explore federal and foundation awards to assist the HCV team in undertaking activities that help low-income families expand their choices to more areas of the city.
- Manage HCV Waiting List of more than 23,000 applicants (waiting list is closed).
- Achieve 90% voucher utilization by the end of FY 2022.
- Manage AH's RAD PBV Waiting List by designating a percentage of turnover tenant-based vouchers under AH's alternative Choice Mobility option for RAD PBV families that express an interest in moving after 12 consecutive months of occupancy in good standing in a public housing community converted under the RAD Program.
- Support newly created HAVEN programs:
 - By reallocating 53 vouchers for Integrated Care and Permanent Supportive Housing (ICPSH) and Rise II activities,
 - By reallocating 100 vouchers for COVID Rapid Support Housing,
 - By securing 23 vouchers for Mainstream One and Mainstream Five Programs.
- Support AH's established HAVEN programs:
 - 300 Family Unification Program (FUP) vouchers,
 - 450 FLOW vouchers,
 - 54 Georgia Housing Voucher Program (GHVP) vouchers,
 - 100 Special Program Vouchers for Homeless Students (or APS vouchers),
 - 100 Housing First Vouchers, and
 - 270 Veteran Affairs Supportive Housing (VASH) vouchers.
- Implement a biennial HQS inspection schedule.

REAL ESTATE PLANNING AND DEVELOPMENT

Brief Description of Business Unit:

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

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

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

Another area of focus for REPD is to establish a plan for self-development as a tool to accelerate the development of affordable housing – while continuing to develop affordable housing through public-private partnerships. A self-development program, would allow greater control and efficiencies in the delivery of affordable housing, and create opportunities to increase revenue-generation to support revitalization. REPD and the AH team will build-out the business plan and continue building internal capacity in planning and development, augmenting internal expertise with a bench of procured professional service firms that include brokers, planners, architects, engineers, construction managers, contractors, and developers.

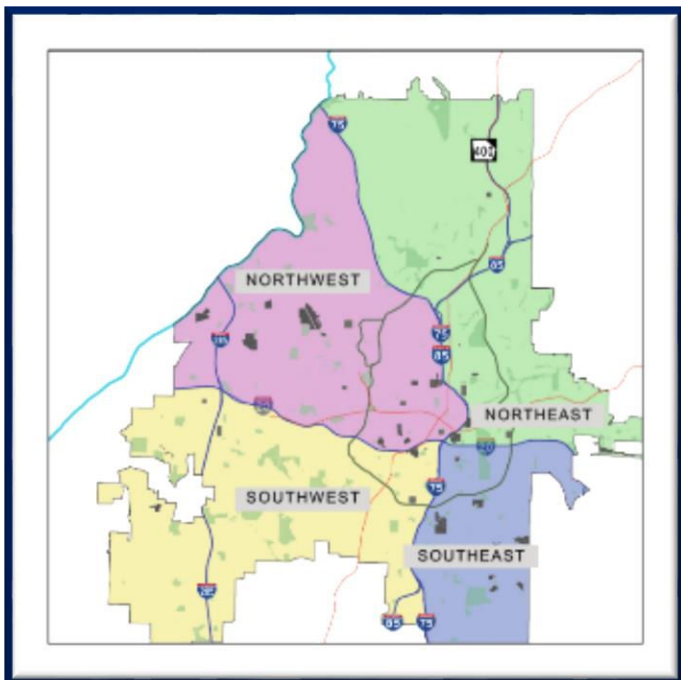
FY 2022 Highlights:

- Advance, commence, or complete development pipeline projects that includes two types of real estate investments:
 - 1) Development on AH-Owned land and
 - 2) Development where AH is not the landowner, but a partner, co-developer, and/or investor in the transaction (“AH Co-investment Program”).
 - Development projects may be transactional, focusing on single phases of development, or transformational, focusing on multi-phased development projects involving community revitalization. Under each approach, REPD's primary focus is on accelerating the development of new affordable housing.
- Create and preserve affordable housing with investments and land transactions that are anticipating financial closings.
 - Consider utilizing a traditional model of private-public development partnership.
 - Explore co-development properties or develop under a self-development model.
- Commence construction starts on 1,608 rental units.
- Continue the build-out of 550 rental and homeownership units.
- Transition 297 units to lease-up.
- Continue to acquire land and structures.

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

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

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



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

Northwest: 1) AH vacant land: Closing and construction on Phase 2 of the former Herndon Homes public housing site (464 Cameron Madison Alexander Boulevard) that will include retail and 197 multifamily mixed-income units. Construction on final two rental phases at Scholars Landing (134 John Hope Drive SW), Ashley IC, a 72-unit multifamily rental project and Ashley II, a 212-unit multifamily rental project. Begin master planning and community engagement at Bowen Homes through the 2020 HUD Choice Neighborhoods Planning Grant (CNPg); 2) AH Co-investment Program: Complete renovation and re-occupancy of the 200-unit multifamily rental complex at London

Townhomes (308 Scott Street) and finalize lease-up.

Southeast: 1) AH vacant land: Closing and construction of new multifamily rental units at the former Englewood public housing site (400 Climax Street, SE).

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

TRANSACTIONS MANAGEMENT AND CAPITAL MARKETS

Brief Description of Business Unit:

AH's Transactions Management and Capital Markets (TMCM) team underwrites and manages rental real estate transactions involving either new construction, or the substantial rehabilitation of rental units, such as through the Rental Assistance Demonstration (RAD) Program. In addition, TMCM projects financial needs for AH-Owned rental units and identifies new capital sources. The team also administers AH's down payment assistance (DPA) programs to increase homeownership opportunities for eligible first-time homebuyers. Since its inception in FY 2007, AH's Homeownership Program has assisted more than 1,300 families realize their dream of homeownership through a DPA award. AH's DPA award can be combined with other DPA awards to maximize affordability in purchasing a home within AH's service jurisdiction.

Originally, AH's homeownership assistance focused on awards in areas around HOPE VI sites⁷ and has since expanded. Under the current format, AH gives a priority and higher level of assistance to current and former AH-assisted families, and professionals and para-professionals employed in education, public safety, and healthcare looking to purchase a home within the city of Atlanta.

FY 2022 Highlights:

- AH plans to award 225 DPA awards in FY 2022.
- AH and its partners may seek to convert units receiving public housing assistance to long-term Section 8 project-based voucher (PBV) assistance under RAD.
 - To date, AH has converted 1,340 public housing units to PBV assistance under RAD.
 - Plans to underwrite the conversion of 431 public housing units.
 - Work collaboratively to schedule and underwrite approximately 1,262 public housing units at nine AH-Owned communities that remain in AH's rental portfolio.
- Ensure long-term affordability by employing third-party funding tools, such as Low-Income Housing Tax Credits (LIHTC), municipal bonds, private mortgage financing, and other tools that provide rent relief.
 - Monitor older mixed-income communities approaching the end of their tax credit compliance period.
- Through collaboration, continue to schedule and underwrite former public housing sites into mixed-use and mixed-income communities, such as Scholars Landing, formerly University Homes.
- In limited cases, provide capital investments (often in conjunction with other agencies) in third-party developments that advance AH's affordable housing mission.

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

AH Team Overview and Highlights – Supportive Teams

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

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

FY 2022 Highlights:

- Collaborate with other AH teams to develop strategies to meet or exceed the proposed new Section 3 rule.
- Collaborate with partners to develop real estate policies and design programs that position AH to maximize affordable housing opportunities.
- Collect, process, monitor, and report COVID-19 related expenditure activities.
- Recruit external partners to close the digital divide.
- Begin to explore potential incentives for assisted families that participate in AH's Achieving Connectivity to Create Equity, and Self-Sufficiency (ACCESS) Program.
- Strengthen AH's digital footprint through training and the expansion of social media platforms to ensure that program participants are connected and informed.

CONSTRUCTION & FACILITIES MANAGEMENT

Brief Description of Business Unit:

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

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

FY 2022 Highlights:

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

GOVERNMENTAL, EXTERNAL AFFAIRS AND HUMAN DEVELOPMENT SERVICES

Brief Description of Business Unit:

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

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

FY 2022 Highlights:

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

Planned Goals and Objectives

This section summarizes existing activities that AH plans to administer, implement, or accomplish over the next 12 months (July 1 – June 30).

A. Short-Term MTW Goals and Objectives

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

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

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

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

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

B. Short-Term Non-MTW Goals and Objectives

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

HOUSING

- Plan and **implement safety measures at AH-owned facilities**, which includes corporate and satellite offices, as well as housing communities. Apply four guiding priorities:
 - 1) Health and safety of residents, 2) Property viability, 3) Compliance, and 4) Redevelopment through the RAD Program in administering and updating preventive maintenance schedules and capital improvement projects.
 - **Manage AH-initiated substantial rehabilitation and significant modernization projects** at AH-Owned communities to meet conversion requirements under the RAD Program.
 - **Administering NSPIRE inspection method** at AH-Owned communities.
- Discuss steps to activate new Annual Contributions Contract (ACC) **Public Housing units under HUD's Faircloth Limits**⁸.
- Train HQS Inspectors on energy and utility audits to **help HomeFlex residents lower their utility costs**.
- Complete and **lease up new or rehabilitated projects**:
 - Capitol View
 - 40 HomeFlex units and 24 HAVEN units
 - Herndon Square – Senior
 - 97 HomeFlex units
 - London Townhomes
 - 200 HomeFlex units
 - 8 Permanent Supportive Housing (PSH) projects
 - 145 HomeFlex Supportive Housing (HAVEN)
- Complete planned owner-occupied exterior home repairs under the Choice Heritage project.
- Initiate construction or complete the lease up of new projects:
 - 72 units at Scholars Landing Phase III, Ashley IC, complete and lease up.
 - 212 units at Scholars Landing Phase IV, Ashley II, initiate construction.
 - 33 units at Scholars Landing Phase V, Homeownership, initiate construction.
 - Ensure that former residents of University Homes receive the first opportunity to return to Scholars Landing. Update resident re-occupancy process for Ashley IC.
- **Complete rehabilitation of Roosevelt Hall.**
- Complete due diligence, planning and development of **affordable housing on AH vacant land** consistent with the agency vision and mission and community input (*timetables are ultimately dependent on financial markets, investors, and availability of low-income housing tax credit (LIHTC) funding*).
 - **SONO/301**. Complete financial closing and begin construction of 300 units.
 - **Bankhead**. Initiate feasibility assessment for development of a mix-use or mix-income project that may include utilization of modular construction.

⁸ AH's Faircloth Limit is 9,140 Public Housing units.

- **Bowen.** Complete environmental and remediation work.
 - Execute two year HUD 2020 Choice Neighborhoods Planning Grant to develop a community-driven master plan for the site and the surrounding neighborhood.
- **Civic Center.** Finalize community driven master plan for mixed-income, mixed-use development with feasibility assessment for preservation of historic building for performing arts center. Establish public private partnerships to develop and operationalize the plan. Continue lease agreements and initiate land transactions with neighbor SouthFace.
- **Englewood Manor (South).** Complete infrastructure development.
 - 200 rental units; complete financial closing and begin multifamily construction.
- **Englewood North.** Complete land swap with city of Atlanta
 - Jonesboro South public housing site for acreage adjacent to the Atlanta Beltline.
 - Dispose of land to City for a three-year lease to allow site operations to close down.
- **Herndon Homes.** Phase 2 is a mixed-income, mixed-use project:
 - 197 rental units; complete financial closing and begin construction.
- **Scholars Landing (CNIG Program).**
 - 72 rental units, complete construction at Phase III, Ashley IC.
 - 212 rental units, continue/start construction at Phase IV, Ashley II.
 - 33 homeownership units, complete financial closing at Phase V of site.
- **West Atlanta Development: Hollywood/Johnson Road Sites.** Issue a Request for Proposal (RFP) for development partners and execute a master development agreement.
- **Westside Properties (Magnolia Perimeter).** Three phase development with three developers to provide:
 - 20 rental units
 - 17 homeownership units.
- **Option Properties (Capitol, Carver, Grady, and Harris vacant land).** These properties are subject to on-going litigation and AH may dispose of properties through ground lease or land sales to the development partner. Please see page 127 of Appendix E for planned dispositions and demolitions.
- Complete due diligence, planning and implementing development-related partnership arrangements in support of **AH's Co-Investment Program** with various agencies, organizations, or developers as aligned with MTW flexibilities and as approved by HUD as Local Non-Traditional MTW Development activities and consistent with agency mission and vision and community input (*timetables are dependent on the market, investors, and LIHTC funding*).
 - **Beltline Crossing I** (East Medina Village). Complete financial closing and begin construction of 250 units.
 - **Flats at Stone Hogan.** Complete financial closing and begin construction of 256 units.
 - **Harmony at Bakers Ferry.** Complete financial closing and begin construction of 108 units.
 - **Heritage Village at West Lake.** Complete financial closing and begin construction of 102 units.
 - **London Townhomes.** Complete construction or substantial rehabilitation.
 - Transition 200 unit project to lease up and re-occupancy phase.
 - **Madison Reynoldstown** (890 Memorial Drive). Complete financial closing and begin construction of 116 units.
 - **Villas at Stone Hogan.** Complete financial closing and begin construction of 192 units.
 - **Sylvan Hills II.** Complete financial closing and begin construction of 200 units.

- **Homeownership Development at West Highlands, Englewood, Mechanicsville, Westside or Magnolia Perimeter Properties.** Upon approval of an updated Homeownership Plan that supports development of affordable and market rate housing on AH-owned land and utilizing fee-simple land sales or a land trust form of ownership to offer long-term affordability, AH will work with developers to close on land sales and initiate construction on:
 - 25 units at Mechanicsville (25 units)
 - 17 units (noted earlier) at Westside Properties
 - 167 units at West Highlands (3B South/2000 Perry)
 - 30 units at West Highlands pursuant to existing agreement

Land sales, construction and homeownership **closings may include reduced land value, an AH investment and AH down payment assistance to support affordability.** In addition, AH will encourage long-term affordability in its homeownership program through land disposition, investments, and partnership with land trusts.

- **Acquisitions.** AH may seek to acquire developed and undeveloped parcels to preserve or increase the supply of affordable housing, particularly in communities of opportunity, to ensure long-term affordability. Activity may include land donations or acquisitions from other public agencies, developers, non-profits and private citizens and may include advantageous tax treatment based on the development of affordable housing on the site. **AH will make such acquisitions that provide an advantage to AH or are part of a redevelopment plan.** Where beneficial, AH will identify alternate sources of capital to finance the acquisition, which may include bonds, loans and private equity investments.
- Review current underwriting and Homeownership Program.
 - Align procedures and practices with industry standards and eliminate obsolete activities.
 - Align policies and procedures with industry standards and AH sustainability needs.
- Target home construction that are representative and reflective of AH's mission.
- Support community oriented housing initiatives, such as Project Shield and others, in accordance with intergovernmental agreements and agency direction. Adopt policies, procedures, and/or guidelines to address/meet program specific initiative requirements.
- Support LIHTC tax credit application of 4% or 9% by development partners for development of Ashley Scholars Landing II.
 - Update AH underwriting model to factor income averaging, "twinning", and other new issues/developments with 4% and 9% tax credits.
- Underwrite and manage closing activities:
 - Ashley Scholars Landing IC.
 - Ashley Scholars Landing II.
- Underwrite and manage RAD closings that convert portfolio units to Section 8 assisted units:
 - Columbia Village units to support the renovation of mixed-income units.
 - Villages at Castleberry Hill II units to support the renovation of mixed-income units.
- Finalize 10-year real estate financial forecast to help identify long-term capital needs.

RESIDENT SELF-SUFFICIENCY

- Collaboratively **investigate strategies** with external partners and AH teams **to ensure local programs are accessible and remain accessible** to low-income families.
- Closely **monitor short-term and long-term homeless prevention assistance** to re-set future AH resources as appropriate.
- **Implement HUD's EnVision Program** to provide a range of educational and supportive services to AH clients under AH's Human Development Services component.
- **Support AH's Family Self-Sufficiency (FSS) Program** and related activities.
- **Ensure that AH retains the best programs and refers participants to such programs** through review of all performance outcomes attended by participants.
- Secure external support for a 3-pronged approach to **close the digital divide**, which includes the provision of low-cost/no cost internet service, issuance of digital devices (e.g., laptops, tablets, etc.), and technology training.
 - Review the 3-pronged approach and other initiatives to avoid duplication of services while identifying potential cost savings and building staff capacity.
- Continue the **delivery of supportive services by UCN case managers and partners** that connect individuals and families to coaching and counseling, health and wellness, workforce development and employment, early childhood development, before, after, and summer school programming, STEM/STEAM programming, college preparatory and continuing education, and aging-in-place activities.

ADMINISTRATION

- Continue to **ensure contractual compliance and oversee diversity and inclusion efforts** where AH funding awards are involved.
- Include and **prioritize sustainability awareness** and practice in procurement policies and hiring practices.
- Develop, in collaboration with AH teams, strategies that ensures AH, its vendors, and partners **comply with the new Section 3 rule** (proposed as 24 CFR part 75) before or by the expiration of the published transition period and compliance date.
- Review strategies to **optimize cost savings, which includes revenue-generating ideas and streamlining processes** commanding AH resources.
- Continue to **monitor and report COVID-19 related expenditures**, whether through the spending of CARES Act funding or the utilization of COVID-19 Waivers.
- Complete or advance, with external support, AH Green Initiative, including:
 - **Job-training program designed** to assist residents to improve and increase relevant skills and expose them **to green sector employment opportunities**.
 - **Establish a preferential AH Buyers Club** with home improvement retailers for AH program partners.
- **Monitor ongoing assistance and operations** to mitigate the associated impact of COVID-19. Assistance includes helping to meet the rapidly changing needs of families most affected by the pandemic.
- **Ensure that AH staff is able to telework effectively** with issued equipment and adequate security including the safe maintenance of personal identification information (PII) during transition to re-occupy AH offices.
- **Maintain and update Choice website** to ensure the most accurate information is available for Choice families, vendors, and partners.

- **Continue community engagement activities** to support increased participation in the UCN, resident and community capacity building, and civic engagement. Planned activities include:
 - Award Choice scholarships and micro-grants, investments in training and mentoring, and conducting outreach activities.
 - Continue implementation of the Critical Community Improvements (CCI) Plan.
 - Conduct community engagement activities to bring awareness to residents and neighbors.
 - Continue to acquire blighted and deteriorated properties in the UCN utilizing CNIG funds.
- Closely monitor recently created HAVEN programs to **ensure voucher utilization** and successful performance.
 - Integrated Care Permanent Supportive Housing.
 - RISE-II.
 - 5-year Mainstream.
- Make Property Owner participation easier by enhancing **online Landlord Briefing and Digital Property Owner Application**.
- Increase property owner awareness of their role in helping to reduce the impact of climate change.
- Train AH HQS Inspectors on energy and utility audits to **help Housing Choice residents lower their utility costs**.
- Add 234 new families (net).
 - Process **1,074 new tenant-based families**.
 - Process 840 attrition TBVs.
 - **Allocate up to 30% of turnover TBVs** for RAD PBV families.
 - **Allocate up to 70% of turnover TBVs** for HCV waiting list families.
 - **Improve Request for Tenancy Approval (RTA) cycle time**.
- Continue to **service remaining 17 HCV Homeownership Program families**.
 - All prospective HCV homebuyers are referred to AH's Homebuyers Program.
- Design **tracking tool to record performance** of AH's Biennial HQS Inspection Schedule.

Long-Term Goals and Objectives

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

C. Long-Term MTW Goals and Objectives

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

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

D. Long-Term Non-MTW Goals and Objectives

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

HOUSING

- **Continue project management supportive functions** in the RAD conversion process through the completion of substantial rehabilitation or significant modernization of public housing units.
- Improve utility efficiency ratings at all AH-Owned properties.
 - Maximize energy and water efficiency in RAD conversions.
 - Encourage existing and future housing partners to improve the utility efficiency at rentals.
- Explore strategies to acquire existing properties from owners planning to sell their properties (or interest) that no longer desire to participate in the HomeFlex Program.
 - Consider utilizing AH's HCV waiting list to assist in filling vacant or hard to fill HomeFlex units.
- Review and revise, as applicable, an updated conversion schedule for the remaining public housing communities scheduled for subsidy conversion assistance under the RAD Program.
- Advance steps to activate new Annual Contributions Contract (ACC) **Public Housing units under HUD's Faircloth Limits**⁹.
 - Issue of a Notice of Funding Availability (NOFA) seeking proposals for development projects using ACC/PH funding.
 - Development **projects on AH vacant land is a priority.**
- Prepare to finish up and close out University Choice Neighborhood (UCN) transformation plans and efforts.
 - Finalize all development activity and associated lease ups.
 - Phase IV, Scholars Landing, Ashley II.
 - Phase V Scholars Landing, Homeownership.
 - Advancing project phases may include disposition of AH-Owned land, public infrastructure/improvement work, and other predevelopment activities.
- Make strategic and deliberate investments to attract and retain residents, support community serving facilities, and projects that enhance public safety and quality of life.
- Continue to work collaboratively with other agencies to implement and potentially administer real estate activities under an aligned co-investment framework that supports low-income families and mutually beneficial to AH.
- Incorporate green development criteria and standards into new development design and plans
 - Increase the percentage of new AH units that achieve some level of green certification.
 - Promote/install green infrastructure within new development scheme or non-housing areas and activities.
- Continue self-development efforts to position AH to engage in construction lending, asset ownership and management, and other self-development activities
 - Build capacity to engage in community development projects that enhance or create amenity-rich neighborhoods.
- Identify new sources of funding and partners to continue AH Co-investment Program.

⁹ AH's Faircloth Limit is 9,140 Public Housing units.

- Seek new sources of funding and partners to support neighborhood revitalization through HUD Choice Neighborhoods Planning or Implementation Grants for Bowen Homes and Thomasville Heights; to support infrastructure and environmental sustainability; and community revitalization.
- Execute master developer agreement for Palmer House project and initiate building design for closing in FY 2023.

RESIDENT SELF-SUFFICIENCY

- Design incentive program based on collected data and research that promotes a culture of work and education.
 - Increase resident employment, wage earnings, training enrollment, and similar economic independence and housing self-sufficiency activities.
 - Consider income disregards to help new workers and returning workers to stabilize.
 - Consider transportation and childcare assistance.
 - Consider stipends and grants for job-related uniforms, tools, and equipment.
- Investigate, and where feasible, implement internet access opportunities to eligible households through Connect Home or other initiatives.
- Implement supportive services, life-long learning, and community engagement programming at Roosevelt Hall once rehabilitation of the building is complete.

ADMINISTRATION

- **Advance exploration of AH Green Initiative**, which is an intentional coordination of committing resources towards reducing utility costs and improving energy efficiency.
- **Review revenue-generating opportunities** of AH-Owned/controlled assets and mitigate risk.
 - Conduct cost-benefit analysis of AH Green Initiative.
 - Explore financial feasibility of solar panel installations.
 - Lease of vacant lots and air space for community events and communication towers.
 - Optimize cost savings through new, revised, or deleted processes and activities.
- Set up periodic review of strategies to ensure AH, its vendors, and partners **continue compliance with new Section 3 rule** (proposed as 24 CFR part 75).
- Review outcome performance of partner programs based on attendance, costs, success, and other metrics to support continuation, contractual revision, or contract end.
- Identify and develop financial vehicles in pursuit of creating an investment vehicle for long-term development of affordable residential communities or creation of areas of opportunities as part of its community revitalization efforts.
 - AH to generate a return on investments and create a sustainable organization to increase the affordable housing stock in Atlanta.
 - Research opportunities to diversify development partnerships and investments that include commercial real estate development and commercial business ventures.
 - Seek, identify, and utilize alternative funding options, such as grant awards, local funds, public funds, and similar funding streams for ongoing and future revitalization activities.
- Consider appropriate application of all elements or parts of the Housing Opportunities through Modernization Act (HOTMA) guidance to maximize creation and preservation of affordable units.

II. GENERAL OPERATING INFORMATION

A. HOUSING STOCK INFORMATION

i. Planned New Public Housing Units

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

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

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

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

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

N/A

ii. Planned Public Housing Units to be Removed

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

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

431

Total Public Housing Units to be Removed in the Plan Year

iii. Planned New Project-Based Vouchers

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

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

576

Planned Total Vouchers to be Newly Project-Based

iv. Planned Existing Project-Based Vouchers

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

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

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

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

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

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

7,858

Planned Total Existing Project-Based Vouchers

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

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

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

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 to meet requirements under the Rental Assistance Demonstration (RAD) Program.

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

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

GENERAL DESCRIPTION OF ALL PLANNED CAPITAL EXPENDITURES DURING THE PLAN YEAR

AH plans to expend approximately \$3.89M for site and building improvements at seven AH-Owned communities. Planned expenditures include asphalt repairs, callbox upgrades, carpet replacement, common area improvements, electrical transformer repairs/replacements, exhaust fan repairs/replacements for laundry rooms, fitness center equipment purchases, gas line upgrades, gutter, downspout, and soffit repairs/replacements, LED nurse call installments, playground equipment installations, boiler, generator, and HVAC installations, signage and trash chute replacements, and upgrades to security camera systems.

In addition, planned capital expenditures include the replacement of 32 back/screen doors, blinds in common areas, carpet in 32 units, LED, emergency exit, exterior or interior lighting, 32 fire panels, and 2 roofs. Further, planned capital expenditures include the installation of 40 flush-mate toilet tanks, 34 HVAC units, 125 PTAC units, 21 appliances (DW, Refrigerator, and/or Stove), 162 garbage disposals, hot water heaters, security cameras, 32 sinks and faucets with sprayer, and 85 smoke detectors,.

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

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

- \$ 356,664 @ Cheshire Bridge Road Highrise
- \$ 81,920 @ Cosby Spear Highrise
- \$ 65,791 @ East Lake Highrise
- \$ 903,363 @ Georgia Avenue Highrise
- \$ 455,400 @ Marian Road Highrise
- \$1,605,394 @ Martin Street Plaza
- \$ 418,941 @ Westminster
- \$3,887,473 Planned Capital Expenditure Total

B. LEASING INFORMATION

i. Planned Number of Households Served

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

PLANNED NUMBER OF HOUSEHOLDS SERVED THROUGH:	PLANNED NUMBER OF UNIT MONTHS OCCUPIED/LEASED*	PLANNED NUMBER OF HOUSEHOLDS TO BE SERVED**
MTW Public Housing Units Leased	15,204	1,267
MTW Housing Choice Vouchers (HCV) Utilized	244,404	20,367
Local, Non-Traditional: Tenant-Based [^]	3,000	250
Local, Non-Traditional: Property-Based [^]	32,052	2,671
Local, Non-Traditional: Homeownership [^]	19,620	1,635
Planned Total Households Served	314,280	26,190

* "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*
Tenant-Based	Developing Alternative and Supportive Housing Resources/SH.2005.09	3,000	250
Property-Based	Reformulating the Subsidy Arrangement in . . . AH's Affordable Communities/RE.2005.09	13,032	1,086
Property-Based	HomeFlex Site-Based Administration/RE.2006.02	19,020	1,585
Homeownership	Comprehensive Homeownership Program/RE.2007.03	19,620	1,635

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

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

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

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

C. WAITING LIST INFORMATION

i. Waiting List Information Anticipated

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

WAITING LIST NAME	DESCRIPTION	NUMBER OF HOUSEHOLDS ON WAITING LIST	WAITING LIST OPEN, PARTIALLY OPEN OR CLOSED	WAS THE WAITING LIST OPENED DURING THE PLAN YEAR
MTW Housing Choice Voucher Program	Community-wide voucher WL for all populations.	24,505	Closed	No
Choice Mobility Vouchers (RAD PBV Program)	Specific voucher WL for eligible residents living at converted PH sites.	3	Partially Open	Yes
MTW Public Housing Program	Community-wide unit WL for all populations managed by a third party at the property level for 9 AH-Owned sites.	1,748	Partially Open	Yes
Site-Based Administration – HomeFlex and Mixed Communities	Community-wide unit WL for all population managed by property owners at the property level for nearly 10,146 units at 113 sites.	47,830	Closed	No

Please describe any duplication of applicants across waiting lists:

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

ii. Planned Changes to Waiting List in the Plan Year

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

WAITING LIST NAME	DESCRIPTION OF PLANNED CHANGES TO WAITING LIST
MTW Housing Choice Voucher	AH purges the HCV waiting list periodically throughout the year and anticipates opening the HCV waiting list within 5 years.
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 open their waiting lists as needed.

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III. PROPOSED MTW ACTIVITIES: HUD Approval Requested

SH.2021.01 – CHOICE NEIGHBORHOODS (CN) DOWN PAYMENT ASSISTANCE (DPA) PROGRAM

A. Activity Description

i. Describe the Proposed Activity.

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



Through this activity, AH plans award one-time assistance to eligible, first time homebuyers seeking to purchase a home constructed at Scholars Landing or within the identified UCN boundaries. The CN DPA award is not comprised of any CNIG funds and is open to eligible applicants that are at or below 80% of the Area Median Income (AMI) Limit¹⁰. Therefore, under this activity, AH plans to award assistance to qualified, first time homebuyers that earn \$68,950 per year for a family of four (adjusted for family household size).

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

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

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

¹⁰ As of April 1, 2020, the AMI for the Atlanta-Sandy Springs-Roswell MSA is \$82,700. AH’s payment standards are higher than the Fair Market Rents (FMRs) approved in FY 2006.

Because AH plans to reserve at least 20% of the new home construction within the UCN boundaries for low-income families, the CN DPA Activity **gives an incentive to families with children where the head of household is working, 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**¹¹. The CN DPA assistance is available on properties owned/acquired by AH within the UCN targeted for single-family home development.

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

AH anticipates the following implementation schedule:

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

B. Activity Metrics Information

i. HUD Standard Metrics applicable to the proposed activity

The following HUD Standard Metrics are applicable to this activity:

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

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

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

iii. Give annual benchmark for each metric

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

¹¹ Second MTW Statutory Objective

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

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

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

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

C. Cost Implications

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

AH **does anticipate** the proposed activity resulting in **a cost implication** for AH.

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

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

- AH projects 20 CN DPA Awards at \$60,000 each that totals \$1,200,000 by project's end.
- AH plans to structure CN DPA loans as a deferred second mortgage loan at 0% interest that will burn off over 10 to 15 years, depending on the amount of the assistance. AH will first take preventive measures to help qualified applicants to understand the home buying process, minimizing foreclosure risk (such as cautioning against using the entire maximum purchase price), and ways to avoid or cure default situations. Defaults on the DPA loan will only occur under one of the following scenarios during the 10 to 15 burn off period:
 1. Owner defaults on the first mortgage
 2. Owner fails to occupy the home as their primary residence
 3. Owner sells the home

Under these circumstances, the balance of the loan becomes due and payable in full. Further, AH will exercise all legal remedies at its disposal to recover funds. In the meantime, AH models the CN DPA Program similar to its DPA Homeownership Program and during the 10 years of program operation, with more than 1,300 closed transactions, the DPA Homeownership Program model has experienced less than 1% in foreclosures. Therefore, our projection is that a similar model for CN will yield similar results, including minimal foreclosures and minimal defaults.

D. Need/Justification for MTW Flexibility

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

AH utilizes MTW Authorization under **Attachment D Uses of Funds Flexibility** of its Amended and Restated MTW Agreement and elements of Notice PIH 2011-45 to establish a down payment assistance program to specifically increase and promote homeownership opportunities for low to moderate-income families that choose to live within the CN footprint, a HUD-approved revitalization area.

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

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

Therefore, AH needs the cited MTW Authorization **to modify HUD Regulation 24 CFR §982.643 Homeownership Down Payment Assistance (DPA) Grants** to offer assistance to qualified individuals and families, including current AH-assisted households, the former residents of University Homes, and non-assisted households earning up to 80% AMI. The Choice Neighborhoods (CN) DPA Program is not an ongoing program, but an activity introduced to support the development of a finite number, up to 20%, of affordable home solely developed by the CN Housing Implementation lead or by AH at the target site (renamed Scholars Landing). Making the affordable homeownership units available to eligible households up to 80% AMI is consistent with AH's approved CN Housing Plan for Scholars Landing. Because of this unique and focused purpose, AH hopes to obtain approval to assist qualified households that desire to live in this HUD-approved revitalization area.

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

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

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

i. Impact Analysis

N/A

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

ii. Hardship case criteria

N/A

iii. Descriptions of annual reevaluations

N/A

iv. Transition period

N/A

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

AH's MTW Activities				
Activity ID		Activity Name	Page	MTW Authorization(s) AH's Attachment D
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
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

AH's MTW Activities				
Activity ID		Activity Name	Page	MTW Authorization(s) AH's Attachment D
HC	2011.02	HCV Program Housing Assistance Payment Abatement Policy	60	Section VII: Establishment of HCV Program
PH	2011.03	Aging Well Program	60	Section IV: Self-Sufficiency/Supportive Services Section V: Single-Fund Budget with Full Flexibility
SH	2013.01	Veterans Supportive Housing	61	Section IV: Self-Sufficiency/Supportive Services Section V: Single-Fund Budget with Full Flexibility

AW.2005.01 - \$125 MINIMUM RENT

i. Plan Year Approved, Implemented, Amended

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

ii. Description/Update

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

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

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

iii. Planned Non-Significant Changes

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 our goal of positioning our families for success, AH designed a work/program requirement by utilizing MTW Authorizations Section I.H: General Conditions and Section IV: Self-Sufficiency/Supportive Services under Attachment D of its Amended and Restated MTW Agreement.

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

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

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

iii. Planned Non-Significant Changes

The only non-significant changes planned for this activity during the plan period continues to align with the eviction moratorium. Therefore, AH plans to resume enforcement of the work/program requirements whenever we return 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 and another portion focuses on aligning standards and timeline expectations that emulate industry best practices and, as appropriate, private rental market practices to reduce administrative burdens. These cited efforts enhance property eligibility criteria for single family, 2 to 4 unit multifamily, and commercial units (5 units or larger) while eliminating the requirement for property owners to provide gas certifications at the initial inspection.

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

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

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

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

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

iii. Planned Non-Significant Changes

AH 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 (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 for future phases.

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

iii. Planned Non-Significant Changes

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 inappropriately housed in AH-Owned communities because of the non-supportive services on site to meet those residents' unique needs.

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

iii. Planned Non-Significant Changes

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

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

iii. Planned Non-Significant Changes

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

Since this activity's implementation, AH's primary focus has been on repositioning its public housing portfolio and adding affordable units to the housing stock. Because of this intense focus, AH did not feature many the various financing components beyond facilitating financial closings. However, AH intends to issue construction loans, not to exceed 5-years to development partners as both a revenue stream to AH and to expedite the development of new affordable housing opportunities. As AH continues to acquire and revitalize communities in accordance with its vision, mission, and current business model, such activities require access to short-term funding for the innovative revitalization ideas and plans to transform amenity-deficient communities into amenity-rich communities and first choice options, where families can live, work, and play.

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.2006.01 – ATLANTA HOUSING SUBMARKET PAYMENT STANDARDS

i. Plan Year Approved, Implemented, Amended

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

ii. Description/Update

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

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

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

iii. Planned Non-Significant Changes

AH does plan anon-significant change, where AH will add another submarket to this activity during the plan period 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-Base Section 8 Vouchers and VII.C: Demonstration Program on Project-Based Financing under Attachment D of its Amended and Restated MTW Agreement to streamline project-basing activities.

In addition, AH initially used this activity to launch a homeless demonstration program and a supportive housing program for persons with developmental disabilities and chronic mental illness at seven privately owned communities. By agreement, AH entered into seven two-year renewable HomeFlex contracts with property owners, where 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 agent have full responsibility for performing all site-based administration tasks for the property, which is subject to AH inspections and reviews, for administrative and programmatic functions carried out in connection with admissions and occupancy procedures relating to HomeFlex assisted units.

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

iii. Planned Non-Significant Changes

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, which is costly. Through utilization of MTW Authorization Section VII: Establishment of Housing Choice Voucher (HCV) Program under Attachment D of its Amended and Restated MTW Agreement AH is able to develop its own rent reasonableness determination for properties owned directly and indirectly by AH.

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

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

iii. Planned Non-Significant Changes

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 and promote homeownership opportunities in healthy, mixed-income communities through the following approach:

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

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

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

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

iii. Planned Non-Significant Changes

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.2007.04 – HOMEFLEX AS A STRATEGIC TOOL

i. Plan Year Approved, Implemented, Amended

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

ii. Description/Update

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

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

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

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

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

iii. Planned Non-Significant Changes

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

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

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

iii. Planned Non-Significant Changes

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) of \$79,700 annually for much of this reporting period (July 1, 2019 – June 30, 2020). With this knowledge and understanding that AH was planning long-term revitalization of its housing stock, AH sought to recruit property owners through incentives to lease their units to families affected by relocation efforts because of HUD-approved demolition of AH-Owned communities.

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

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

iii. Planned Non-Significant Changes

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.

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

i. Plan Year Approved, Implemented, Amended

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

ii. Description/Update

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

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

iii. Planned Non-Significant Changes

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.2011.03 – AGING WELL PROGRAM

i. Plan Year Approved, Implemented, Amended

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

ii. Description/Update

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

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

iii. Planned Non-Significant Changes

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.2013.01 – VETERANS SUPPORTIVE HOUSING

i. Plan Year Approved, Implemented, Amended

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

ii. Description/Update

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

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

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

iii. Planned Non-Significant Changes

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 (ARRA) of 2009	N/A	2009 ¹²	2012	AH did not need an MTW waiver to conduct this activity
	Voluntary Compliance Agreement (VCA)	N/A	2009 ¹³	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 (IDAs)	2005	N/A	2019	AH elected not to implement this MTW Activity
HC. 2006.03	Housing Choice Inspection Fees	2006	N/A	2019	AH determined that this activity requires more research. AH may propose this activity at a later date
HD. 2006.04	Standards for Residency in Single-Family Homes	2006	N/A	2008	AH did not need an MTW waiver to conduct this activity
HC. 2006.05	Port Administration Re-engineering	2006	N/A	2019	Activity was not supported under MTW Authorizations
HD. 2007.05	Housing Choice Family Self-Sufficiency (FSS) 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 (QLI)	2007	2007	2010	AH did not need an MTW waiver to conduct this activity
PH. 2007.07	Utility Allowance Waiver	2007	2007	2010	AH elected to close out this activity based on AH analysis (admin costs outweighed revenue)
SH. 2008.04	John O. Chiles Annex Supportive Housing Pilot	2008	2008	2014	AH did not need an MTW waiver to conduct this activity
HD. 2008.05	Pre-Relocation Client Education (part of QLI)	2008	2008	2010	AH did not need an MTW waiver to conduct this activity
AW. 2010.01	Business Transformation Initiative (ERP solution)	2010	2010	2016	AH did not need an MTW waiver to conduct this activity
AW. 2011.01	Non-Elderly Disabled Income Disregard	2011	2011	2020	AH combines this activity with AW.2005.02 – Elderly Income Disregard and may be able to close both activities in accordance with Notice PIH 2016-05 (HA) – Streamlining Admin. Regs for Programs Administered by PHAs

¹² AH's estimated implementation year of Federal grant award.

¹³ AH made enhancements and improvements to facilities, programs, policies, and procedures in response to accessibility requirements

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

V. SOURCES AND USES OF MTW FUNDS

A. ESTIMATED SOURCES AND USES OF MTW FUNDS

i. Estimated Sources of MTW Funds

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

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

ii. Estimated Uses of MTW Funds

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

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

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

N/A

iii. Description of Planned Use of MTW Single Fund Flexibility

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

PLANNED USE OF MTW SINGLE FUND FLEXIBILITY

AH expended MTW Funds, defined as combining its Public Housing Operating Subsidy, Housing Choice Voucher funds, and certain capital funds into a single fund pursuant to the authority outlined in AH’s MTW Agreement, on MTW eligible activities. AH exhausted its Replacement Housing Factor (RHF) Funds in FY 2020 and did not include them in the MTW Funds although the MTW Agreement permits AH to do so.

AH cannot identify a singular activity nor multiple activities in which AH utilized only the MTW Single Fund Flexibility that do not require MTW Authorization(s) under Attachment C or D of AH’s Standard and Restated MTW Agreement. However, AH did initiate steps to direct funding towards specific housing and service delivery programs that respond to local needs or as set forth in AH’s business plan and as AH determined to best use of funds for the purposes of fulfilling its mission to deliver innovative, affordable housing. An example includes plans to direct funds towards planned high-rise construction projects with underground parking. This future project could directly address the shortfall of affordable 1 and 2 bedroom units in AH’s service jurisdiction.

B. LOCAL ASSET MANGEMENT PLAN

i. Is the MTW PHA allocating costs within statute?

Yes

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

Yes

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

Yes, please see page 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 plan to make any changes to the LAMP during FY 2022.

C. RENTAL ASSISTANCE DEMONSTRATION (RAD) PARTICIPATION

i. **Description of RAD Participation**

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

RENTAL ASSISTANCE DEMONSTRATION (RAD) PARTICIPATION

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

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

No

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

N/A

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VI. ADMINISTRATIVE

A. BOARD RESOLUTION AND CERTIFICATIONS OF COMPLIANCE

Please **see page 73 of Appendix A** to review the Board Resolution and Certifications of Compliance.

B. DOCUMENTATION OF PUBLIC PROCESS

AH made its FY 2022 MTW Annual Plan available for public review and comment at AH-Owned communities, on its website, and through social media mediums from **February 7 through March 9**. In addition, AH held a series of public meetings and a public hearing during this time to receive comments on planned activities. Further, AH permits public discussion of agenda items prior to their adoption. Please **see page 101 of Appendix B** to review AH's public process.

C. PLANNED AND ONGOING EVALUATIONS

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

D. LOBBYING DISCLOSURE

AH does not engage in lobbying activities. Therefore, AH only includes the Certification of Payments form (HUD-50071). Please **see page 123 of Appendix D** to review applicable document.

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Appendix A: HUD Form 50900 Attachments

Board Secretary Certificate
Board Resolution
Certifications of Compliance

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SECRETARY’S CERTIFICATE

I, **EUGENE E. JONES, JR.**, DO HEREBY CERTIFY that:


1. I am the presently appointed and qualified Secretary of the Board of Commissioners of The Housing Authority of the City of Atlanta, 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
Patrick Dixon
Yunice Emir
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 24th day of March, 2021.

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 SUBMIT FISCAL YEAR 2022 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, the during each year of the MTW demonstration period, an MTW Annual Plan must be submitted to HUD with a resolution adopted by the AH Board of Commissioners (“Board”) approving the plan and certifying that a public hearing has been held regarding the plan;

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

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

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

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

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

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

Resolution OPS-1
FY 2022 MTW Annual Plan

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 2022, as described in Exhibit OPS-1-A;

WHEREAS, the Amended and Restated Statement of Corporate Policies is the controlling policy document governing the assistance programs administered by AH, 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 2022 MTW Annual Plan; (ii) authorize the submission of AH’s FY 2022 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 2022 MTW Annual Plan; and (v) approve the adoption and implementation of the Amended and Restated Statement of Corporate Policies as set forth in the FY 2022 MTW Annual Plan;

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

1. AH’s Fiscal Year (“FY”) 2022 Moving to Work Annual Plan (the “FY 2022 MTW Annual Plan”), including the projects, activities, initiatives and any policy changes that will be implemented during FY 2022 as described in Exhibit OPS-1-A, is hereby approved.
2. Each of the Chair 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 2022 MTW Annual Plan.
3. The Amended and Restated Statement of Corporate Policies, is hereby approved in conjunction with AH’s FY 2022 Annual Plan, and AH is hereby authorized to adopt and implement such policies.
4. The President and Chief Executive Officer is authorized to submit AH’s FY 2022 MTW Annual Plan and such other required documents, certifications or forms to HUD with such changes, additions, corrections or amendments as she shall deem necessary or appropriate or as may be required by HUD.
5. The President and Chief Executive Officer and any person or persons designated and authorized to so act by the President and Chief Executive Officer are hereby authorized to implement the projects, activities, initiatives and any policy changes set forth in the FY 2022 MTW Annual Plan.

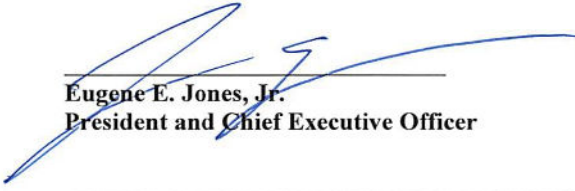
Appendix A: Board Resolution

Resolution OPS-1
FY 2022 MTW Annual Plan

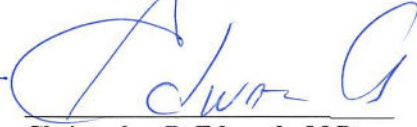
ADOPTED, by the Board of Commissioners of The Housing Authority of the City of Atlanta, Georgia and signed in authentication of its passage, 24th day of March 2021.

ATTEST:

APPROVAL:

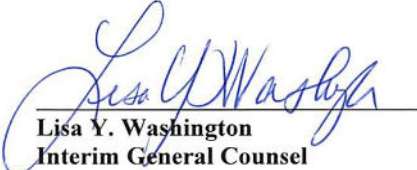


Eugene E. Jones, Jr.
President and Chief Executive Officer



Christopher R. Edwards, M.D.
Chair

APPROVAL FOR FORM AND LEGAL SUFFICIENCY:



Lisa Y. Washington
Interim General Counsel

FY 2022 MTW ANNUAL PLAN PRESENTATION



2022 Summary of AH's MTW Plan



Public Comment Period: February 7 through March 9, 2020

AH encourages public participation in the preparation and submission of its FY 2022 MTW Annual Plan. You can view the Plan at www.atlantahousing.org/about-us/plans-reports/ or at one of AH's communities during this period.

The purpose of this meeting is to **receive comments on AH's 2022 MTW Annual Plan.**

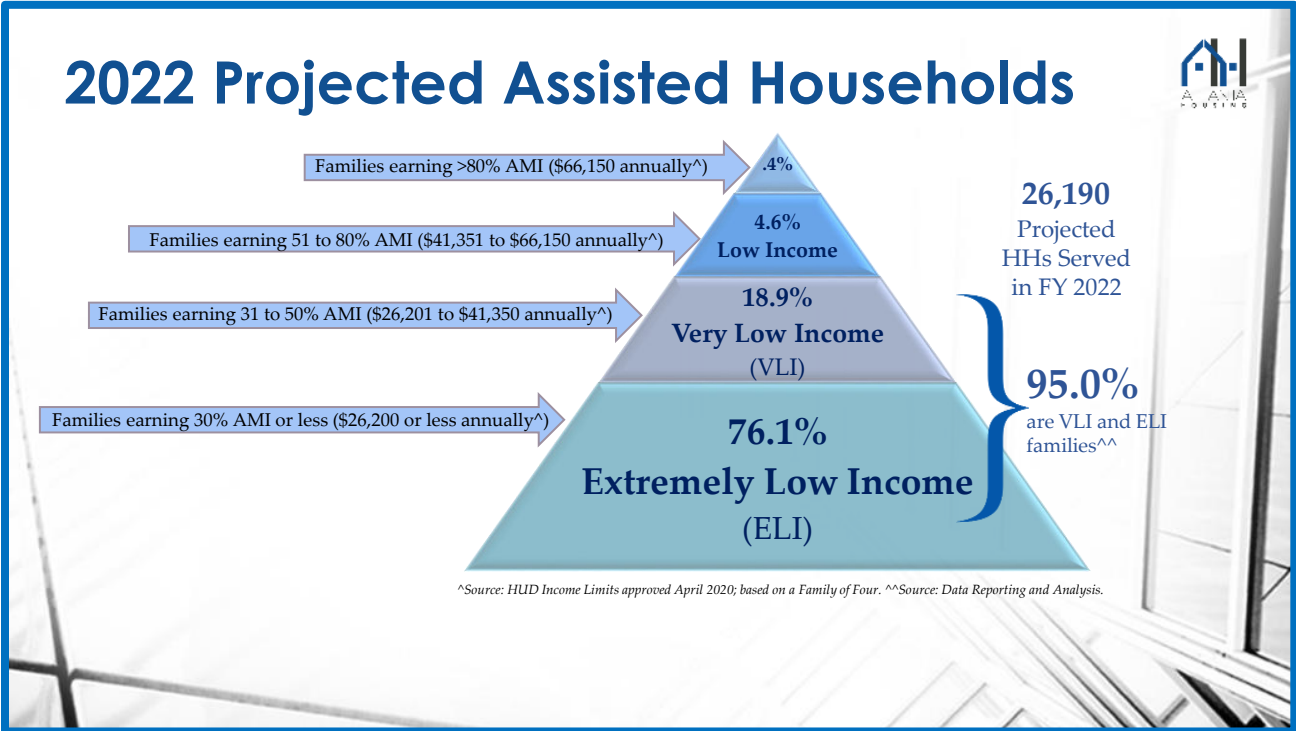
- Highlighted contents of the Plan include:
 - AH's Agency Goals (numerical measurable)
 - Current, modified, and planned MTW Activities
 - Operational Activities
 - Other Agency Activities



2022 Challenges and Solutions

The challenge for AH continues to be creating and preserving the affordable housing supply in a growing market.

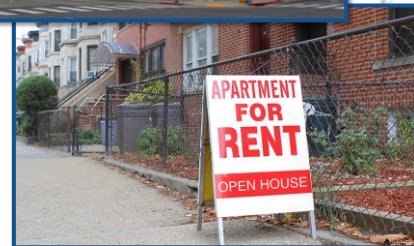
The solution for AH continues to be collaboration.



2022 Agency Goals and Objectives



- **Create or Preserve 2,700 Affordable Housing Units:**
 - **Create New Affordable Housing Units** through new construction, new HomeFlex Agreements, new voucher issuance, and new DPA award activities (excludes carryover projects).
 - **Preserve Existing Affordable Housing Units** through substantial rehabilitation, significant modernization, HomeFlex renewals, and unit conversions activities (excludes carryover projects).
- **Maintain an 84% Voucher Utilization Rate:**
 - Issue/renew approximately 11,000 TBVs.
 - Assign/reassign assistance for nearly 7,000 PBVs.
 - Voucher counts are fluid as families enter and exit rental assistance programs daily.



2022 Agency Goals and Objectives



- **Serve 600 New Households:**
 - Complete and **lease-up 145 new HAVEN units** under HomeFlex.
 - **Lease-up 24 new units** at planned HomeFlex projects: Standard, Senior, or HAVEN programs.
 - Issue and **lease up a net of 234 new TBVs***.
 - Assist eligible first-time homebuyers and **close on 225 new DPA* Awards.**



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

2022 Agency Activities - MTW



- Propose **New MTW Activities** to:
 - Reduce duplicative work efforts in the admission and renewal of eligible voucher-holding families.
 - This activity should eliminate/reduce the number of interim certifications each year.
 - Contribute to development and redevelopment activities at a level higher than current HUD limits.
 - This activity allows AH to create its own construction cost limits schedule.
 - Increase housing choices for low-income families within the Choice Neighborhoods Implementation Grant boundaries.
 - This activity may award down payment assistance to eligible families that choose to purchase a home and live within the CN footprint.



2022 Agency Activities – Future MTW

- Explore and evaluate activities to address local challenges. Some **examples of local challenges** includes:
 - **Closing the digital divide**
 - Preliminary solutions may include securing **external support and other funding sources** to help low-income families access devices, provide those families Wi-Fi connectivity, and offer training to help those families in Achieving Connectivity to Create Equity, Solidarity and Success (**ACCESS**) activities.
 - **Long-Term Homelessness Solutions**
 - Preliminary solutions may include acquisition and rehabilitation/modernization of existing structure(s).
 - **Single-Family Home Construction**
 - Preliminary solutions may include AH building single-family homes to increase affordable housing units.



**These are pipeline possibilities that must be vetted by AH and proposed to HUD in a future MTW Plan.*

2022 Goals & Objectives – Asset & Property Management

- Primary goals and objectives:
 - **Managing relationships** with private owners/developers and property management companies within AH’s portfolio.
 - **Recruiting and retaining property owners** to create and preserve affordable housing units for low-income families.
 - **Ensuring safe, decent, and sanitary living conditions** for residents.
 - Overseeing internal processes and programs to **provide quality living services**.
 - Reviewing, managing, and **updating the utility allowance schedule**.



2022 Activities – Asset & Property Management

New HAVEN HomeFlex: Permanent Supportive Housing Units	
1055 Arden	11
1265 Lakewood	16
356 James P. Brawley Drive	8
55 Milton	18
588 and 592 Paines Avenue	8
687 & 693 Dalvigney; 613 Echo St.	8
Abbingdon at Ormewood Park	8
Covenant House	30
Intrada Westside (DLH Development)	25
The Mallory	14
Thrive Sweet Auburn	23
Total Affordable HAVEN Units	169

- **Create 169 supportive housing units** through 11 new HAVEN HomeFlex Assistance Payment Agreements.
- **Market HAVEN HomeFlex Program** to private multi-family property owners and developers to dedicate a portion of their rental units and provide wrap around services for eligible families.
- Continue to explore strategies to acquire properties from owners planning to sell their properties (or interest) that no longer desire to participate in the HomeFlex Program.

Scheduled HomeFlex Renewal Agreements	
Project Name	Unit Count
Adamsville Green Senior Apts	46
Ashton at Browns Mill	74
Columbia Blackshear Senior Res	78
Heritage Station I - Family	88
Heritage Station II - Senior	150
Manor at Scott's Crossing	100
Odyssey at Villas	32
O'Hern House	76
Parkside at Mechanicsville	32
Retreat at Edgewood	40
The Peaks at MLK	73
Veranda at Auburn Pointe III	102
Welcome House	41
Total Affordable Units	932

2022 Activities – Asset & Property Management

- **Preserve 932 affordable units** at 13 communities by renewing HomeFlex Assistance Payment Agreements
 - Work closely with partners to **manage more than 6,000** HomeFlex, HAVEN, and RAD **units at 80 communities**
- Secure HomeFlex Assistance Payment Agreements at properties in areas that families might not have otherwise considered or been able to afford without the assistance of HomeFlex.
- Explore the possibilities of utilizing AH's HCV waiting list to fill vacant or hard to fill HomeFlex units, which may benefit applicants, AH, and its partners.

2022 Activities – Asset & Property Management

- Oversee management of **9 AH-Owned communities** (1,200+ residential units) with Property Management Developers (PMDs).
- Administer assistance at **23 mixed communities** (2,200+) in collaboration with AH partners.
- **Recapitalize 2 AH-Owned communities** (431 units) to long-term Section 8 project-based assistance under RAD:
 - **Convert 282 public housing (PH) units** at Cosby Spear Highrise.
 - **Convert 149 PH units** at East Lake Highrise.
- Submit financial plan to convert 32 PH units at Westminster.
 - Note: Construction and Facilities Management oversees communities that need substantial rehabilitation or significant modernization to meet RAD requirements. This business unit also oversees AH's Capital Improvement Projects planning, facilities maintenance, and contractual compliance
- Exercise RAD Section 18, as applicable, to replace affected units with PBVs.



East Lake High-rise above; 149 units.



Cosby Spear High-rise above; 282 units.

2022 Goals and Objectives – Choice Neighborhoods

- Primary goals and objectives:
 - **Managing AH’s \$30 million Choice Neighborhoods Implementation Grant (CNIG) from HUD to redevelop the former University Homes public housing site.**
 - **Revitalize the University Choice Neighborhoods (UCN) comprised of Ashview Heights, Atlanta University Center, and Vine City neighborhoods (see image to the right).**
 - **Work in concert with the city of Atlanta and external lead partners and organizations to implement transformation activities under HUD’s transformation mantra of Housing, People, and Neighborhoods.**



2022 Activities – Choice Neighborhoods

Housing

- Conduct activities in concert with AH’s Planning & Development and Asset & Property Management teams to:
 - **Lease up 72-units at Ashley IC** (Scholars Landing Phase III) with 50 affordable units (69%).
 - Begin construction on final **212-units at Ashley II** (Phase IV) with 114 affordable units (54%).
 - Finalize construction plans of **33 for-sale townhomes** (Phase V) with 7 affordable homes planned (20%).
- Finalize the design of the Choice Neighborhoods (CN) Down Payment Assistance (DPA) Program to implement spring 2022. Preliminary concepts include:
 - Offer one-time **assistance award for families 115% of AMI** or less.
 - Award is **based on family size and need** up to \$60k.
 - CN DPA is **awarded as a deferred loan** over time to promote stability.
 - CN DPA must be **used only for DPA and closing costs** in the CN footprint.



Artist rendering of Ashley IC construction.

2022 Activities – Choice Neighborhoods



- **People**
 - Continue activities to **connect former University Homes and UCN residents** to education, health, and workforce development services and resources.
- **Neighborhoods**
 - **Assist 6 legacy homeowners** in the UCN with exterior home repairs and façade improvements to preserve existing housing.
 - **Acquire blighted properties** for single family home development.
 - Complete the rehabilitation of the **historic Roosevelt Hall** building as a vibrant community facility.

2022 Activities – Choice Neighborhoods

CN Ongoing and planned activities:

Housing

- Continue to support activities associated with updating and advancing the UCN transformation plans and efforts, including promoting and advancing mixed-income development efforts.

People

- Design incentive program that promotes a culture of work and education by increasing resident employment, wage earnings, training enrollment, and similar economic independence and housing self-sufficiency activities.
 - Preliminary ideas: income disregards, transportation and childcare assistance, stipends and grants for job-related supplies and equipment.
- Implement internet access opportunities through Connect Home or other initiatives.
- Implement supportive services, life-long learning, and community engagement programming at Roosevelt Hall.

Neighborhood

- Promote residential and commercial growth in the UCN through collaborative efforts with Choice Neighborhood partners.
- Make strategic and deliberate investments to attract and retain residents, support community-serving facilities, and projects that enhance public safety and quality of life.

2022 Goal and Objectives – Housing Choice Vouchers

- Primary goals and objectives:
 - **Administration of all aspects of AH’s tenant-based rental assistance program:**
 - Monitoring more than 20,000 vouchers under conventional and alternative (HAVEN) rental assistance guidelines.
 - Approximately 52% are implemented under the traditional Section 8 tenant-based rental assistance program.
 - Approximately 11% are assigned to other rental assistance programs created by AH’s MTW designation for local housing challenges.
 - Approximately 37% are used as PBVs under AH’s HomeFlex Program.



2022 Goal and Objectives – Housing Choice Vouchers

- Issue and **lease-up 234 new TBV** holding families.
 - Approximately 1,100 new families minus 840 attrition families (90% lease-up success).
- Implement MTW Activity to reduce duplicative work efforts in the admission and renewal of eligible voucher-holding families. Preliminary objectives include:
 - Eliminating/reducing the annual number of interim certifications processed.
 - Prohibiting/restricting interim requests 90 days before and 90 days after completed certifications.
 - Applied by certification effective dates (new and annual).
 - AH will review written hardship requests on a case-by-case basis pursuant to its Hardship Policy.

2022 Goal and Objectives – Housing Choice Vouchers

- **Manage HCV Waiting List** of more than 23,000 families.
 - Random selection.
 - Assist local families first.
- Manage the **Choice Mobility Waiting List (WL)**:
 - Specifically for RAD PBV families that reside at converted properties.
 - Separate WL pursuant to alternate option under RAD and to ensure uniformity and fairness of requesting eligible RAD PBV families.
 - Families must make a written request for WL placement before their annual exam and after they occupy the RAD PBV unit for 12 consecutive months in good standing after the converted property reaches its conversion anniversary.

2022 Goal and Objectives – Housing Choice Vouchers



- Conduct **9,000 HQS Inspections** (a new and annual estimate that excludes special, quality control, and other inspection types that add to the total):
 - Continue virtual inspections as appropriate.
 - Continue to sponsor and support the Landlord Advisory Group to relay and receive information and as a marketing tool in the recruitment and retention of landlord partners.
- Implement **AH's Biennial HQS Inspection Schedule**
 - Review **HomeFlex criteria** to ensure that properties/units qualify for an every two-year inspection cycle.
 - Review **Housing Choice criteria** to ensure that properties/units qualify for an every two-year inspection cycle.

2022 Goals and Objectives – Planning and Development

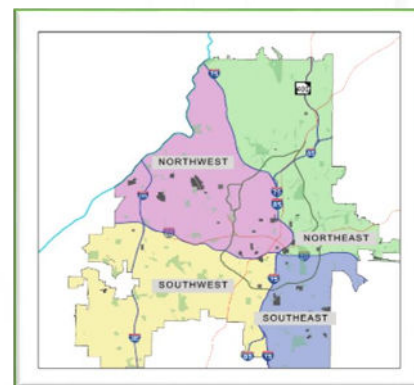
- Primary goals and objectives:
 - **Developing affordable housing in healthy communities** throughout AH's service jurisdiction.
 - End-to-end **oversight of the real estate development process** and oversight of the planning and development of **existing and future AH parcel holdings**, including on AH vacant land or through partnerships and investments where AH may not own the land.
 - Focus on the **acquisition of new properties, establishing a self-development plan** for the agency, **and managing a pipeline of real estate projects** in various phases of the development cycle, from acquisition to developer partnership and build-out to lease-up.

REAL
ESTATE



2022 Goals and Objectives – Planning and Development

- Continue **utilization of a portfolio approach and AH's 10-year real estate plan to prioritize** the timing and funding of projects separated into geographic quadrants (see image).
- **Focus on land acquisition**, whether through purchases, donations, or land swaps, to increase the supply of affordable units, including local, non-traditional units, throughout AH's service jurisdiction.
- Managing AH's **\$450k Choice Neighborhoods Planning Grant** for Bowen Homes former PH site.

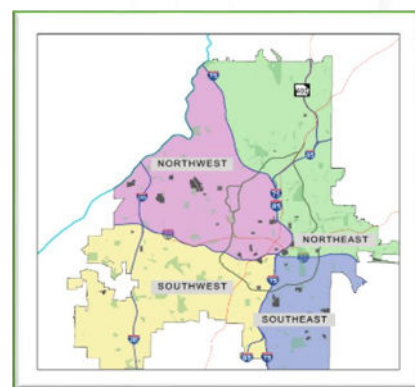


2022 Goals and Objectives – Planning and Development

- AH's CLC Schedule limits add three building types:
 - 5-Story Wrap Around or Podium Midrise;
 - 5 to 9 Story Mezzanines; and
 - More than 9-Story Mezzanines over retail/office space with subterranean parking
- AH's CLC Schedule adds the following extraordinary costs:
 - Davis-Beacon Wage Requirement
 - Fire safety design considerations
 - Green sustainability costs
 - Stabilization measures; and
 - Structured underground parking
- Finalize design of MTW Activity that allows AH to create its own cost limits to align with the local market costs and challenges. Preliminary concepts include:
 - Introduction of **AH's Construction Limit Costs (CLC) Schedule** to:
 - Contribute at a higher level to development and redevelopment activities.
 - Add specific building types and extraordinary costs not included in HUD's limits (see list to the left).

2022 Goals and Objectives – Planning and Development

- **Work cross-functionally in the agency to establish a plan for self-development** as a tool to manage and accelerate the development of affordable housing.
 - A self-development program would allow full utilization of AH plans, capacity and resources to **directly manage the project design and construction costs and timelines** and offer AH an opportunity to increase its revenue-generating opportunities to support the further development of affordable housing.
 - Begin to explore opportunities to incorporate AH Green Initiatives in new construction and substantial rehabilitation projects.



2022 Activities– Planning and Development

Planned Development Projects	
New Planned Projects	
Project Name	Unit Count
Flats at Stone Hogan	256
Sylvan Hills II	200
Villas at Stone Hogan	192
Total Affordable Units	648

- **Advance development/redevelopment projects*:**
 - Close **3 new projects (648 units)** (see chart).
 - Advance 2 Choice projects (284 units).
 - Advance 20 carryover projects (1,733 units).
- Execute an **RFP for development partners.**
 - West Atlanta Development: Hollywood/Johnson Road Sites.
- Develop **Choice Neighborhood Transformation Plan for Bowen Homes** and surrounding neighborhood.
- Finalize community-driven master **plan for mixed-income, mixed-use development at the Civic Center.**
- Get **Homeownership Plan approved** to continue Homeownership Development.

**Actual projects and unit counts may change based on feasibility studies and market conditions.*

PLANNED SPECIAL APPLICATIONS CENTER (SAC) SUBMISSIONS

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

2022 Activities – Planning and Development

- Submit **Disposition/Demolition applications:**
 - 14 Disposition Applications (sale, lease, assignment, or other transfer of value, etc.).
 - 1 Demolition Application (destruction, razing, or tearing down a structure on a building site).
 - “Option” properties may include:
 - Capitol
 - Carver
 - Grady
 - Harris (vacant)

2022 Activities – Transactions Management and Capital Markets



- **Research efforts that increase homeownership and proposes solutions that improve housing affordability** in accordance with intergovernmental agreements and agency direction.
- Identify **new capital sources to support future development/redevelopment projects:**
 - Future transactions may include new construction of public housing units under the Faircloth Limit.

2022 Activities – Transactions Management and Capital Markets

- Award **225 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 or 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.



Other Agency Activities – 2022

- The listed **activities are not prioritized** and do not modify current HUD rules or regulations:
 - Continue to plan and **implement enhanced safety measures at AH-Owned facilities**, including housing communities:
 - **Continue administration of the NSPIRE inspection method** being tested at AH communities.
 - Commence and complete capital improvement projects at AH-Owned facilities.
 - **Oversee diversity and inclusion and ensure contractual compliance** involving AH funding.
 - Investigate and develop strategies to **ensure AH, partners, and vendors comply with Section 3** and forthcoming new Section 3 rule.
 - Review strategies that **promote agency sustainability**, such as optimizing cost savings or generating revenue.
 - Monitor and report COVID-19 related expenditures.
 - Track COVID-19 Waiver utilization.

Other Agency Activities – 2022

- **Implement HUD's EnVision Program.**
- Continue to sponsor and support the Family Self-Sufficiency (FSS) Program activities.
 - Investigate strategies that ensure local programs are accessible and remain accessible to low-income families.
 - Continue supportive services activities for AH assisted families
- Pursue events for AH Cares volunteer corps pursuant to staff interest/participation while continuing to highlight events that assist residents, improve the community and adjacent areas.
- Complete or **advance**, with external support, **AH's Green Initiative:**
 - Design job-training program that helps AH-assisted families improve employability skills and gain exposure to green sector employment opportunities.
 - Train HQS Inspectors on energy and utility audits to help AH-assisted families lower their utility costs.

Other Agency Activities – Future

- **AH may pursue the following potential activities based on information collected.** These activities are in different vetting stages. This list is not all-inclusive
 - **Seek new sources of funding and partners to support neighborhood revitalization** through HUD Choice Neighborhood Planning (Thomasville Heights) or Implementation (Bowen) Grants to support infrastructure and environmental sustainability; and community revitalization.
 - Build capacity to engage in community development projects that enhance or create amenity-rich neighborhoods.
 - Create an investment vehicle for the long-term development of affordable residential communities or creation of areas of opportunities as part of its community revitalization efforts.
 - Seek, identify and utilize alternative funding options, such as grant awards, local funds, public funds, and similar funding streams for ongoing and future revitalization activities.
 - Review parameters and protocols to potentially **activate a new Annual Contributions Contract (ACC) Public Housing** under the Faircloth Limits (AH's current limit exceeds 9,000 units).
 - Diversify development partnerships and investments that **may include commercial real estate development and commercial business ventures.**

2022 Public Comments

END PUBLIC MEETING/HEARING

Please provide comments via the following mediums

Email: strategy@atlantahousing.org

Message Line: 404.817.7458

US Mail: 230 John Wesley Dobbs

MTW Office

Atlanta, GA 30303-2429



CERTIFICATIONS OF COMPLIANCE

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

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

Acting on behalf of the Board of Commissioners of the Moving to Work Public Housing Agency (MTW PHA) listed below, as its Chairman or other authorized MTW PHA official if there is no Board of Commissioners, I approve the submission of the Annual Moving to Work Plan for the MTW PHA Plan Year beginning (07/01/2021), hereinafter referred to as "the Plan", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:

- (1) The MTW PHA published a notice that a hearing would be held, that the Plan and all information relevant to the public hearing was available for public inspection for at least 30 days, that there were no less than 15 days between the public hearing and the approval of the Plan by the Board of Commissioners, and that the MTW PHA conducted a public hearing to discuss the Plan and invited public comment.
- (2) The MTW PHA took into consideration public and resident comments (including those of its Resident Advisory Board or Boards) before approval of the Plan by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the Annual MTW Plan.
- (3) The MTW PHA certifies that the Board of Directors has reviewed and approved the budget for the Capital Fund Program grants contained in the Capital Fund Program Annual Statement/Performance and Evaluation Report, form HUD-50075.1 (or successor form as required by HUD).
- (4) The MTW PHA will carry out the Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990.
- (5) The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.
- (6) The Plan contains a certification by the appropriate state or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice, for the MTW PHA's jurisdiction and a description of the manner in which the Plan is consistent with the applicable Consolidated Plan.
- (7) The MTW PHA will affirmatively further fair housing by fulfilling the requirements at 24 CFR 903.7(o) and 24 CFR 903.15(d), which means that it will take meaningful actions to further the goals identified in the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR 5.150 through 5.180, that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing, and that it will address fair housing issues and contributing factors in its programs, in accordance with 24 CFR 903.7(o)(3). Until such time as the MTW PHA is required to submit an AFH, and that AFH has been accepted by HUD, the MTW PHA will address impediments to fair housing choice identified in the Analysis of Impediments to fair housing choice associated with any applicable Consolidated or Annual Action Plan under 24 CFR Part 91.
- (8) The MTW PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
- (9) In accordance with 24 CFR 5.105(a)(2), HUD's Equal Access Rule, the MTW PHA will not make a determination of eligibility for housing based on sexual orientation, gender identify, or marital status and will make no inquiries concerning the gender identification or sexual orientation of an applicant for or occupant of HUD-assisted housing.
- (10) The MTW PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
- (11) The MTW PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
- (12) The MTW PHA will comply with requirements with regard to a drug free workplace required by 24 CFR 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.

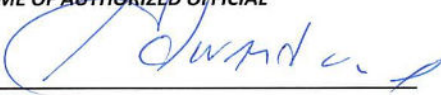
(21) The MTW PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the Moving to Work Agreement and Statement of Authorizations and included in its Plan.

(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 24, 2021
	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

Summary Documentation

Overview of Stakeholders Briefings and Public Hearing

Public Comments

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DOCUMENTATION OF PUBLIC PROCESS

In accordance with local, state, 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 conducts virtual meetings whenever possible and especially applicable to AH’s Fiscal Year (FY) 2022 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, 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 7, 2021 through March 9, 2021** that focused on AH’s FY 2022 MTW Annual Plan and proposed policy changes.

FY 2022 Public Hearing Notification and Stakeholders Briefings				
Meeting/Hearing Date	Stakeholders Group	Total Attendance	Public	AH Staff
Tuesday, January 12, 2021	Atlanta Continuum of Care (CoC)	174	173	1
Monday, February 8, 2021	Atlanta CoC Newsletter - Distribution	650	650	
Tuesday, February 9, 2021	Academia, Housing Advocates, Legal	24	9	15
Thursday, February 11, 2021	Jurisdiction Wide Council - Resident Council Presidents	9	4	5
Thursday, February 11, 2021	Creative Choice Homes, Inc.	8	2	6
Friday, February 12, 2021	Columbia Residential	15	7	8
Tuesday, February 16, 2021	RE Sub-Cabinet, CN Advisory, HDS Service Providers	35	20	15
Monday, February 22, 2021	Integral Development Group	14	6	8
Tuesday, February 23, 2021	Business & Philanthropy	29	6	23
Tuesday, February 23, 2021	Landlord Advisory Group	27	17	10
Thursday, February 25, 2021	Public Hearing	139	112	27
Friday, February 26, 2021	HJ Russell Group	13	6	7
Thursday, March 4, 2021	Public Officials - Appointed, Elected, Local, State, Federal, etc.	31	10	21
Outreach Effort Totals:	13 Events	1,168	1,022	146

Appendix B: Public Process

Pursuant to COVID-19 protocols, The Plan was available for review on AH’s website. However, AH sent The Plan or presentation materials electronically to individuals, communities, and organizations by request. AH accepted comments on The Plan during 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 12, 2021 in this Plan.

AH communicated notification of The Plan, it’s availability and the Public Hearing via public notices posted in AH-Owned communities and buildings and 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, to Chinese, Korean, Russian, and Spanish. Public Notices announcing AH’s Public Hearing appeared in the following media publications:

FY 2022 Stakeholders Briefings and Public Hearing Notifications	
Publication	Publication of Notification
Daily Report	Thursday, February 11, 2021
Atlanta Journal Constitution	Thursday, February 11, 2021
Mundo Hispanico Ediciones	Thursday, February 11, 2021
The Atlanta Voice	Friday, February 12, 2021
The Atlanta Voice	Thursday, February 18, 2021
Daily Report	Tuesday, February 23, 2021
Atlanta Journal Constitution	Tuesday, February 23, 2021
Mundo Hispanico Ediciones	Thursday, February 25, 2021

Appendix B: Public Comments

AH's 2022 PUBLIC MEETING / PUBLIC HEARING SESSIONS			
Meeting / Hearing Date	Stakeholder Group	Public Comment	Response / Action
Tuesday, February 9, 2021	Academia Partners, Affordable Housing Advocates, and Legal Community and Organizations	For the proposed interim MTW Activity, will AH provide a form or include instructions/guidance to let participants know how to write hardship requests and that requests should be in writing?	As AH finalizes the design of this activity, AH can look at modifying an existing form or creating a new form that guides both program participants and AH staff for a uniform processing of hardship requests.
		For the proposed interim MTW Activity, will interim requests be retroactive since this activity restricts interim requests/processing?	No, AH will not make interim changes retroactive. Program participation is based on eligibility and AH seeks to reduce duplicative work efforts with this MTW Activity. Qualifying a family for rental assistance and then changing their income during the first year, especially 30 days after signing the lease is counter-productive. Therefore, AH will use income sources reported to qualify families, calculate their rental portion, and may consider hardships via written request on a case-by-case basis.

Appendix B: Public Comments

AH's 2022 PUBLIC MEETING / PUBLIC HEARING SESSIONS			
Meeting / Hearing Date	Stakeholder Group	Public Comment	Response / Action
Tuesday, February 9, 2021	Academia Partners, Affordable Housing Advocates, and Legal Community and Organizations	Given current conditions, is AH implementing a suspension of its work requirements and rent calculations?	AH has not formally suspended its work requirement, but is not officially enforcing it either. This means that AH does not apply the work requirement to new admission families and AH expects families employed before the pandemic to continue meeting the work/program requirement to retain assistance. In the meantime, families that lose their employment because of COVID-19 are not required to meet the work/program requirement by a specific deadline (usu. 90 days). AH most likely has addressed rent calculations and similar challenges involving COVID-19 during the interim certification at the outset of the pandemic. Finally, AH continues to operate under the national eviction moratorium (set to expire March 31, 2021) and is not terminating program participation because of unemployment.
		Do you have the location for the Sylvan Hills II project and what it may look like?	Sylvan Hills II is located at 1950 Sylvan Road, Atlanta, GA 30310. This is the second of three phases in the Sylvan Hills masterplan. This project is located on a 5-acre portion of an 18.9-acre vacant site and AH plans to develop it into a mixed-income, 200-unit multifamily rental community with 21% of the total units reserved for households earning up to 60% of the area median income (AMI). Phase I of this project has already begun construction and will include 183 senior rental units, 100% affordable. AH anticipates the completion of Phase I in 2021. Phase III is expected to include a retail space outparcel and 34 for-sale townhomes. We have not started construction on Phase III.

Appendix B: Public Comments

AH's 2022 PUBLIC MEETING / PUBLIC HEARING SESSIONS			
Meeting / Hearing Date	Stakeholder Group	Public Comment	Response / Action
Thursday, February 11, 2021	Jurisdiction Wide Council – Resident Council Presidents	<p>About the dual detectors planned for AH-Owned communities, will they prevent people from smoking in their homes?</p>	<p>AH adopted the 'Smoke Free' Policy mandated by HUD. Residents should not smoke in their units. The dual detectors will detect smoke and carbon monoxide; however, AH does not know the level of sensitivity, so these detectors may detect smoke from burning items, such as cigarettes, cigars, pipes, incense, candles, and similar.</p>
			<p>AH takes smoking in units very seriously. Therefore, residents are encouraged to report unit smokers to the property manager in order to maintain safe living conditions for all residents.</p>
		<p>Cosby Spear Highrise has a problem with guests parking in resident parking spaces, which leaves residents with nowhere to park. We have a voluntary parking taskforce to report incidences to the property manager. Can AH help?</p>	<p>AH defers resolution to its property management team; however, AH will monitor this issue. Perhaps parking permits is a potential solution in addition to tow zone signage to help the voluntary parking taskforce.</p>

Appendix B: Public Comments

AH's 2022 PUBLIC MEETING / PUBLIC HEARING SESSIONS			
Meeting / Hearing Date	Stakeholder Group	Public Comment	Response / Action
Tuesday, February 16, 2021	Choice Neighborhoods Advisory Committee, Human Development Services Service Providers, and Real Estate Sub-Cabinet	AH states that their voucher utilization goal is 84%, is that higher than [other] PHAs?	As part of AH's strategic plan, AH adopted a performance metric to increase/achieve a utilization rate consistent with its vision and mission, as well as reflective of market conditions. AH's 84% utilization rate remains consistent with prior year goals. AH is not familiar with other MTW PHA goals, but understands that HUD desires a 90% voucher utilization rate and AH is moving in that direction.
		What is AH's Hardship Policy utilization [like]?	AH makes every effort to ensure that it offers families experiencing a hardship all appropriate options suitable to their needs. That said, families must submit hardship requests in writing, where the hardship duration will last longer than 30 consecutive days. AH's hardship utilization rate is low; probably less than 5% of AH-assisted households request a hardship annually. Nonetheless, AH will evaluate each submission on a case-by-case basis.

AH's 2022 PUBLIC MEETING / PUBLIC HEARING SESSIONS			
Meeting / Hearing Date	Stakeholder Group	Public Comment	Response / Action
Tuesday, February 16, 2021	Choice Neighborhoods Advisory Committee, Human Development Services Service Providers, and Real Estate Sub-Cabinet	Can AH provide more detail on Gap Financing Activity?	All of AH's activities are intended to 'move' with the housing supply, current market demand, and overall market conditions, especially AH's Gap Financing Activity. This administrative tool permits AH to meet a temporary or permanent shortfall in funding and to engage in affordable housing development through investments and partnerships with private developers through land acquisition, construction, bridge and permanent loans, providing housing to low-income families within its service jurisdiction.
Tuesday, February 23, 2021	Business and Philanthropy	No Comments Received	N/A
Thursday, February 25, 2021	Public Hearing	Why can't we open the [waiting] list and get to 100%?	AH continues to work from its March 2017 waiting list that includes more than 23,000 families and although AH would love to achieve 100% voucher utilization, achievement of this goal is unrealistic. First, it is very challenging for families to locate affordable, suitable housing in Atlanta. Second, under AH's MTW Agreement, HUD fully funds all authorized MTW vouchers. This increase funds a variety of MTW Programs, where 100% voucher utilization would jeopardize the continuation of these programs.

Appendix B: Public Comments

AH's 2022 PUBLIC MEETING / PUBLIC HEARING SESSIONS			
Meeting / Hearing Date	Stakeholder Group	Public Comment	Response / Action
Thursday, February 25, 2021	Public Hearing	How can AH accommodate ports, but not pull off the waiting list?	Actually AH does both. First, it is important to remember that ports are families that already possess a voucher and are either moving into or out of AH's service area. In the case of move outs, AH bills the housing authority to which the family ported. On the other hand, AH absorbs families onto its voucher program instead of billing the housing authority. AH randomly selects registrants off of the waiting list bi-monthly and screens those families to ensure that they meet AH's residency preference (AH helps local families before helping out-of-area/state families). On average, AH selects about 800 families each month and annually houses 1,100 to 1,200 families from the waiting list and referral programs.
		Does AH work with NACA?	AH's homeownership program covers all homeownership topics to assist prospective homeowners from 'thought to threshold'. Therefore AH collaborates with many organizations, including NACA to offer the best information possible to help first time homebuyers remain homeowners.

Appendix B: Public Comments

AH's 2022 PUBLIC MEETING / PUBLIC HEARING SESSIONS			
Meeting / Hearing Date	Stakeholder Group	Public Comment	Response / Action
Thursday, February 23, 2021	Public Hearing	Will there be a utility allowance for the internet?	Providing internet to HCV families is a nationwide challenge because HCV families spread across respective cities. Although HUD rules disqualified internet as a necessary utility, the pandemic has many people rethinking that stance. Currently, AH is working on an idea to close the digital divide and potentially provide an internet consideration for supported families.
		Multiple praises and recognition given to AH from Zoom attendees for its good work.	AH appreciates the warm comments and truly believes that its work is valued and important. AH is pleased to hear the feedback and proud of the turnout attendance, so AH will consider future Public Hearings via Zoom or similar platform.
		Multiple inquiries were made into AH's DPA and proposed CN DPA programs.	AH plans to hold an informational session on March 25 at 6p for current, AH-assisted families that are interested in homeownership. During this informational session, AH will go over the criteria for the DPA Program and inform prospective homebuyers of the CN DPA Program proposed for 2022.
Thursday, March 4, 2021	Public Officials	No Comments Received	N/A

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Appendix C: Requirements of AH's MTW Agreement

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 2021 Households by Unit Size					
	0/1 BRs	2 BRs	3 BRs	4 BRs	5+ BRs	Total*
AH-Owned	1,128	44	20	27	0	1,219
MIXED	1,482	1,523	561	46	0	3,612
RAD PBV Conversions	604	1	0	0	0	605
HomeFlex	2,957	1,375	200	4	0	4,536
Housing Choice: Tenant-Based	2,400	3,403	2,776	870	0	9,449
Housing Choice: Ports	1,684	0	0	1	0	1,685
Totals:	10,255	6,346	3,557	948	0	21,106

**AH cannot accurately track characteristics of local, non-traditional households and does not include them in the planned households served count.*

Appendix C: Elements of Legacy Attachment B

Planned Households - By Family Size

Community & Program Type	FY 2021 Households by Family Size					
	1 Member	2 Member	3 Member	4 Member	5+ Member	Total*
AH-Owned	1,095	72	15	14	23	1,219
MIXED	1,906	786	503	244	174	3,613
RAD PBV Conversions	571	34	0	0	0	605
HomeFlex	2,957	1,375	200	4	0	4,536
Housing Choice: Tenant-Based	3,015	2,377	1,753	1,180	1,124	9,449
Housing Choice: Ports	331	300	325	359	370	1,685
Totals:	9,875	4,944	2,796	1,801	1,691	21,107

**AH cannot accurately track characteristics of local, non-traditional households and does not include them in the planned households served count.*

Appendix C: Elements of Legacy Attachment B

Planned Households - By Income Group

Community & Program Type	FY 2021 Households by Family Size				
	≤30%	31 - 50%	51 - 80%	≥80%	Total*
AH-Owned	1,105	100	11	3	1,219
MIXED	2,609	802	183	18	3,612
RAD PBV Conversions	532	67	6	0	605
HomeFlex	3,532	891	109	4	4,536
Housing Choice: Tenant-Based	6,590	2,137	672	50	9,449
Housing Choice: Ports	1,684	1	0	0	1,685
Totals:	16,052	3,998	981	75	21,106

**AH cannot accurately track characteristics of local, non-traditional households and does not include them in the planned households served count.*

Appendix C: Elements of Legacy Attachment B

Planned Households - By Race and Ethnicity

Community & Program Type	FY 2021 Households by Family Size					
	African American	Caucasian	Native American	Asian	Pacific Islander	Total
AH-Owned	977	132	1	107	2	1,219
MIXED	2,609	802	183	18	0	3,612
RAD PBV Conversions	457	111	1	33	3	605
HomeFlex	4,263	230	5	34	4	4,536
Housing Choice: Tenant-Based	9,340	94	12	2	1	9,449
Housing Choice: Ports	1,669	10	4	2	0	1,685
Totals:	19,315	1,379	206	196	10	21,106

**AH cannot accurately track characteristics of local, non-traditional households and does not include them in the planned households served count.*

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 2017 Actual	FY 2018 Actual	FY 2019 Actual	FY 2020 Actual	FY 2021 EOY Projection	FY 2022 EOY Projection
AH-Owned	PH	1,793	1,586	1,586	1,261	1,003	540
MIXED	PH	2,221	2,155	2,155	1,562	1,170	727
	RAD PBV	0	423	423	1,503	1,991	2,453
	HF	1,775	1,543	1,509	1,358	1,521	1,533
	LIHTC	1,171	1,131	1,084	1,088	1,085	1,086
HomeFlex	HF	3,364	4,012	4,230	4,803	4,990	5,090
	LIHTC	1,525	1,595	1,589	1,585	1,585	1,585
Housing Choice: Tenant-Based	HCV	8,381	8,608	9,094	9,393	9,404	9,589
Housing Choice: Ports	HCV	2,086	2,029	1,860	1,711	1,402	1,685
Housing Choice: Homeownership	HCV	25	23	19	18	18	17
Homeownership - Other	DPA	553	724	993	1,225	1,398	1,635
Short-Term Housing Assistance	MTW	199	215	380	244	250	250
Totals:		23,093	24,044	24,922	25,751	25,817	26,190

[^]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 Lenny Koltochnik, Policy Research Director at 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 34** 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 122** of this document. Further, AH plans to revisit these benchmarks during the fiscal year to update the measurable outcomes as appropriate.

Security

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

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

ELEMENT VIII. MANAGEMENT INFORMATION FOR LEASED HOUSING

Leasing Information

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

Inspections Strategy

AH Reviews of AH-Owned Communities

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

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

AH Reviews of Mixed Communities

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

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

Appendix C: Elements of Legacy Attachment B

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

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

ELEMENT IX. RESIDENT PROGRAMS

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

ELEMENT X. OTHER INFORMATION AS REQUIRED

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

MTW PROGRAM BENCHMARKS

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

Measurable Outcome	Annual MTW Program Benchmarks					
	Baseline	FY 2022	FY 2023	FY 2024	FY 2025	FY 2026
• % PH Rents Uncollected	2%	≤ 2%	≤ 2%	≤ 2%	≤ 2%	≤ 2%
• PH Occupancy Rate	98%	≥ 98%	≥ 98%	≥ 98%	≥ 98%	≥ 98%
• PH Emergency Work Orders Completed or Abated in < 24 hours	99%	≥ 99%	≥ 99%	≥ 99%	≥ 99%	≥ 99%
• PH Routine Work Orders Completed in < 30 Days	5 Days	100%	100%	100%	100%	100%
• % Planned PH Inspections Completed	100%	100%	100%	100%	100%	100%
• HCV Budget Utilization Rate	98%	≥ 98%	≥ 98%	≥ 98%	≥ 98%	≥ 98%
• % Planned Annual HQS Inspections Completed	98%	≥ 98%	≥ 98%	≥ 98%	≥ 98%	≥ 98%
• HQS Quality Control Inspections	≥ 1.4%	≥ 1.4%	≥ 1.4%	≥ 1.4%	≥ 1.4%	≥ 1.4%
• Resident Homeownership as a CSS	6	224	231	239	247	255
• Resident Workforce Participation as a CSS	6,415	8,641	8,646	8,651	8,656	8,661
• Project-Based Financing Closings	N/A	5	6	6	6	6

Abbreviations/Acronyms: PH = Public Housing; HCV = Housing Choice Vouchers; HQS = Housing Quality Standards; CSS = Community and Supportive Services

Appendix D: Lobbying Disclosure

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.

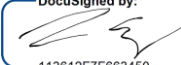
I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate.

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

DocuSigned by:

113612F7F663450...

Date (mm/dd/yyyy)

03/12/2021

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

Local Asset Management Plan (LAMP)

AH's CLC Schedule Comparison

Planned/Proposed Disposition/Demolition Applications

COVID-19 Waiver Utilization

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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,
13. Any other activities that can be readily identifiable with delivering housing assistance to low-income families under the MTW Program.

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

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

Appendix 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,
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"> • Square footage of properties managed
Housing Choice Voucher Program	<ul style="list-style-type: none"> • Leased vouchers
Inspection Services	<ul style="list-style-type: none"> • Number of inspections
Real Estate Group	<ul style="list-style-type: none"> • Active revitalizations • Number of properties managed • Number of properties and developments supported • RAD Conversions

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.

Appendix E: Special Applications Center (SAC) Submission(s)

PLANNED SPECIAL APPLICATIONS CENTER (SAC) SUBMISSIONS

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

OVERVIEW: AH UTILIZED COVID-19 WAIVERS

Line #	Item	Statutory and Regulatory Applicability	Summary of Waiver/Alternative	Adoption Date
1	PH and HCV-1 PHA 5-Year and Annual Plan	<u>Statutory Authority</u> Section 5A(a)(1), Section 5A(b)(1), Section 5A(g), Section 5A(h) <u>Regulatory Authority</u> § 903.5(a)(3), 903.5(b)(3), 903.21	<ul style="list-style-type: none"> Alternative dates for submission Changes to significant amendment process 	May 27, 2020
2	PH and HCV-2 Family income and composition – delayed annual reexaminations	<u>Statutory Authority</u> Section 3(a)(1) <u>Regulatory Authority</u> § 982.516(a)(1), § 960.257(a)	<ul style="list-style-type: none"> Permits the PHA to delay the annual reexamination of income and family composition HCV PHAs must implement HCV-7 for impacted families if they implement this waiver 	May 27, 2020
3	PH and HCV-3 Annual reexamination Income Verification	<u>Regulatory Authority</u> § 5.233(a)(2) <u>Sub-regulatory Guidance</u> PIH Notice 2018-18	<ul style="list-style-type: none"> Waives the requirements to use the income hierarchy, including the use of EIV, and will allow PHAs to consider self-certification as the highest form of income verification PHAs that implement this waiver will be responsible for addressing material income discrepancies that may arise later 	May 27, 2020
4	PH and HCV-4 Interim reexaminations	<u>Statutory Authority</u> Section 3(a)(1) <u>Regulatory Authority</u> § 5.233(a)(2), 982.516(c)(2), 960.257(b) and (d) <u>Sub-regulatory Guidance</u> PIH Notice 2018-18	<ul style="list-style-type: none"> Waives the requirement to use the income verification requirements, including the use of EIV, for interim reexaminations 	May 27, 2020
8	HQS-1 Initial inspection	<u>Statutory Authority</u> Section 8(o)(8)(A)(i), Section 8(o)(8)(C) <u>Regulatory Authority</u> § 982.305(a), 982.305(b), 982.405	<ul style="list-style-type: none"> Changes initial inspection requirements, allowing for owner certification that there are no life-threatening deficiencies Where self-certification was used, PHA must inspect the unit no later than October 31, 2020. 	May 27, 2020

Appendix E: COVID-19 Waiver Utilization

Line #	Item	Statutory and Regulatory Applicability	Summary of Waiver/Alternative	Adoption Date
10	HQS-3 Non-Life Threatening HQS - Initial Unit Approval	<u>Statutory Authority</u> Section 8(o)(8)(A)(ii) <u>Regulatory Authority</u> HOTMA HCV Federal Register Notice January 18, 2017	<ul style="list-style-type: none"> Allows for extension of up to 30 days for owner repairs of non-life threatening conditions 	May 27, 2020
11	HQS-4 Initial HQS - Alternative Inspections	<u>Statutory Authority</u> Section 8(o)(8)(A)(iii) <u>Regulatory Authority</u> HOTMA HCV Federal Register Notice January 18, 2017	<ul style="list-style-type: none"> Under Initial HQS Alternative Inspection Option - allows for commencement of assistance payments based on owner certification there are no life-threatening deficiencies Where self-certification was used, PHA must inspect the unit no later than October 31, 2020. 	May 27, 2020
12	HQS-5 Biennial Inspections	<u>Statutory Authority</u> Section 8(o)(D) <u>Regulatory Authority</u> §§ 982.405(a), 983.103(d)	<ul style="list-style-type: none"> Allows for delay in biennial inspections All delayed biennial inspections must be completed as soon as reasonably possible but by no later than October 31, 2020. 	May 27, 2020
13	HQS-6 Interim Inspections	<u>Statutory Authority</u> Section 8(o)(8)(F) <u>Regulatory Authority</u> §§ 982.405(g), § 983.103(e)	<ul style="list-style-type: none"> Waives the requirement for the PHA to conduct interim inspection and requires alternative method Allows for repairs to be verified by alternative methods 	May 27, 2020
16	HQS-9 HQS QC Inspections	<u>Regulatory Authority</u> § 982.405(b)	<ul style="list-style-type: none"> Provides for a suspension of the requirement for QC sampling inspections 	May 27, 2020
20	HCV-2 PHA Oral Briefing	<u>Regulatory Authority</u> § 982.301(a)(3) § 983.252(a)	<ul style="list-style-type: none"> Waives the requirement for an oral briefing Provides for alternative methods to conduct required voucher briefing 	May 27, 2020

Appendix E: COVID-19 Waiver Utilization

Line #	Item	Statutory and Regulatory Applicability	Summary of Waiver/Alternative	Adoption Date
21	HCV-3 Term of Voucher -Extensions of Term	<u>Regulatory Authority</u> § 982.303(b)(1)	<ul style="list-style-type: none"> Allows PHAs to provide voucher extensions regardless of current PHA policy 	May 27, 2020
23	HCV-5 Absence from unit	<u>Regulatory Authority</u> § 982.312	<ul style="list-style-type: none"> Allows for PHA discretion on absences from units longer than 180 days PHAs must not make HAP payments beyond 12/31/20 for units vacant more than 180 consecutive days 	May 27, 2020
24	HCV-6 Automatic Termination of the HAP Contract	<u>Regulatory Authority</u> § 982.455	<ul style="list-style-type: none"> Allows PHA to extend the period of time after the last HAP payment is made before the HAP contract terminates automatically. 	May 27, 2020
25	HCV-7 Increase in Payment Standard	<u>Regulatory Authority</u> § 982.505(c)(4)	<ul style="list-style-type: none"> Provides PHAs with the option to increase the payment standard for the family at any time after the effective date of the increase, rather than waiting for the next regular reexamination to do so. 	May 27, 2020
26	HCV-8 Utility Allowance Schedule	<u>Regulatory Authority</u> § 982.517	<ul style="list-style-type: none"> Provides for delay in updating utility allowance schedule 	May 27, 2020
28	HCV-10 FUP	<u>Statutory Authority</u> Section 8(x)(2)	<ul style="list-style-type: none"> Allows PHAs to increase age to 26 for foster youth initial lease up 	May 27, 2020
30	PH-2 Total Development Costs	<u>Regulatory Authority</u> § 905.314(c)	<ul style="list-style-type: none"> Waives the TDC and HCC limits permitting approval of amounts in excess of published TDC by 25% to 50% on a case by case basis 	May 27, 2020
37	PH-9 Utility Allowance	<u>Regulatory Authority</u> § 965.507	<ul style="list-style-type: none"> Provides for delay in updating utility allowance schedule 	May 27, 2020
42	12a Form HUD 50058	<u>Regulatory Authority</u> 24 CFR Part 908, § 982.158 <u>Sub-regulatory Guidance</u> PIH Notice 2011-65	<ul style="list-style-type: none"> Waives the requirement to submit 50058 within 60 days Alternative requirement to submit within 90 days of the effective date of action 	May 27, 2020