



# FY 2021 MOVING TO WORK ANNUAL REPORT

Board Approval: September 22, 2021

HUD Submission: October 4, 2021

**HUD Acceptance: April 22, 2022**



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

OFFICE OF PUBLIC AND INDIAN HOUSING

April 22, 2022

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

Subject: Acceptance of Atlanta Housing's FY2021 Annual Moving to Work Report

Dear Mr. Jones:

The Department of Housing and Urban Development has completed its review of Atlanta Housing's (AH) FY2021 Annual MTW Report, which was initially submitted on October 4, 2021. I am writing to inform you that AH's FY2021 Annual MTW Report, as submitted on October 4, 2021, is accepted.

Please note, while HUD is supportive of AH's efforts, this acceptance does not necessarily constitute an endorsement of any particular policies described in the Report. In providing assistance to families under programs covered by this Report and corresponding Plan, AH must comply with the rules, standards and policies established in the Plan. Also, the approved Plan, accepted Report, and all required attachments and documents should be available for review and inspection at AH's principal office during normal business hours.

Please contact Alison Christensen, MTW Coordinator, if you have any questions.

Sincerely,

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

cc: Robert Kenner, Atlanta Field Office  
Belinda Bly, Urban Revitalization Division

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

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*The MTW Team appreciates the support of AH staff that continues to make huge contributions to the preparation and publication of this document.*

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

## Contents of FY 2021 Report

I. INTRODUCTION .....	7
Ia. INTRODUCTION: FY 2021 HIGHLIGHTS.....	9
Ib. INTRODUCTION: FY 2021 ACCOMPLISHMENTS.....	11
A. Short-Term MTW Goals and Objectives .....	11
B. Short-Term Non-MTW Goals and Objectives.....	13
C. Long-Term MTW Goals and Objectives.....	18
D. Long-Term Non-MTW Goals and Objectives .....	19
II. GENERAL OPERATING INFORMATION .....	21
A. Housing Stock Information.....	21
B. Leasing Information .....	30
C. Waiting List Information .....	32
D. Information on Statutory Objectives and Requirements .....	33
III. PROPOSED MTW ACTIVITIES: HUD Approval Requested .....	37
IV. APPROVED MTW ACTIVITIES: HUD Approval Previously Granted.....	39
A. Implemented Activities.....	39
B. Not Yet Implemented Activities .....	70
C. Activities on Hold.....	70
D. Closed Out Activities .....	70
V. SOURCES AND USES OF MTW FUNDS .....	73
A. Actual Sources and Uses of MTW Funds .....	73
B. Local Asset Management Plan (LAMP) .....	73
VI. ADMINISTRATIVE.....	75
A. Reviews, Audits, and Inspections .....	75
B. Evaluation Results.....	75
C. MTW Statutory Requirement Certification.....	75
D. MTW Energy Performance Contract (EPC) Flexibility Data .....	75
APPENDIX A: MTW Statutory Requirements.....	79
APPENDIX B: HUD Form 50900 Attachments .....	83
APPENDIX C: Requirements of AH's MTW Agreement .....	99
APPENDIX D: Local Asset Management Plan (LAMP) .....	109
APPENDIX E: Other Information.....	117

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# I. INTRODUCTION

## About Atlanta Housing

The Housing Authority of the City of Atlanta, Georgia or Atlanta Housing (AH) provides rental assistance to low-income families across the City of Atlanta. It is the 10<sup>th</sup> largest housing authority in the country and the largest housing authority in the state of Georgia.

Atlanta is now the 4<sup>th</sup> fastest growing city in the country. Several factors have contributed to this growth: its relative affordability and comfortable climate; its business-friendly environment across many diverse industries; and its 57 colleges and universities, which attract companies eager to tap into the talents of highly skilled employees. Atlanta's attractiveness, combined with financial and/or economic pandemic economics, has meant significantly increased housing costs. Housing prices increased 24.3 percent over a period of 12 months between June 2020 and June 2021, and rents grew by 12 to 15 percent over the same period.

AH's participation in the Moving-to-Work (MTW) Demonstration Program<sup>1</sup> has been a critical tool in AH's ability to respond effectively to the twin challenges of rapid growth and increasing market rents. AH not only shelters some of Atlanta's most vulnerable residents, it also strengthens Atlanta's affordable housing sector.

**AH's Portfolio of Housing** includes the following programs:

- **AH-Owned Communities:** 9 public housing sites: 7 for elderly and disabled and 2 family sites.
- **Down-Payment Assistance:** A forgivable subsidy loan to help eligible first-time homebuyers.
- **HomeFlex:** AH's MTW Project-Based Rental Assistance (PBRA) Program.
  - **Standard HomeFlex:**
    - For multi-family units in AH-Owned, Mixed, or Stand-Alone privately owned communities.
    - For buildings or communities that house older persons (near elderly (55+) and elderly (62+) residents).
  - **HomeFlex Supportive Housing (HAVEN):**
    - For property owners that agree to provide housing for vulnerable and targeted population groups.
- **Housing Choice Vouchers:** Tenant-Based housing assistance administered by AH.
- **Mixed Communities:** Communities that are ground leased and sit on AH-Owned land, or mixed-income developments in which AH has an ownership interest, investment, or subsidy agreement.
- **RAD PBV Communities:** Former public housing communities converted to project-based voucher (PBV) assistance under HUD's Rental Assistance Demonstration (RAD) Program.

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<sup>1</sup> Created by the United States Congress (US Congress or Congress) in 1996 and administered by the United States Department of Housing and Urban Development (HUD). The US Congress renews the MTW Demonstration Program periodically and Congress last extended the Program through June 20, 2028. AH executed its MTW Agreement with HUD on September 23, 2003.

## Moving-to-Work (MTW)

As an MTW PHA<sup>2</sup>, AH deploys its MTW Authorizations to combine program funds and waive certain program rules and regulations<sup>3</sup> in pursuit of innovative solutions to local housing challenges. AH is required to meet MTW Statutory Requirements in the administration of its programs. The **MTW Statutory Requirements** are as follows:

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

In addition to supporting the MTW Demonstration Program, AH has supported the MTW Collaborative and HUD's MTW expansion efforts by:

- Welcoming the Housing Authority of Newnan, GA – Cohort #1 expansion selection
- Supporting the Housing Authority of DeKalb County, GA – Cohort #2 expansion finalist
- Continuing to maintain an **interest in becoming a Regional MTW PHA** once HUD establishes this designation

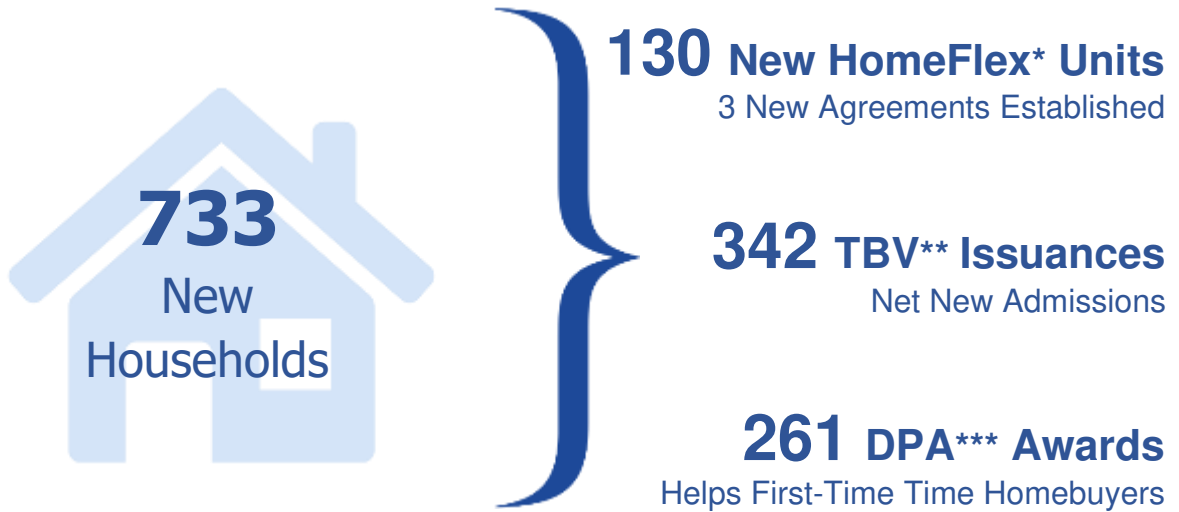
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<sup>2</sup> There were 39 MTW PHAs prior to new legislation that adds 100 MTW cohorts. AH received its MTW designation in 2003.

<sup>3</sup> Found in the United States Housing Act of 1937 (Housing Act or the Act) applicable to the Housing Choice Voucher and Public Housing Rental Assistance Programs (Section 8 and Section 9).

# Ia. INTRODUCTION: FY 2021 HIGHLIGHTS

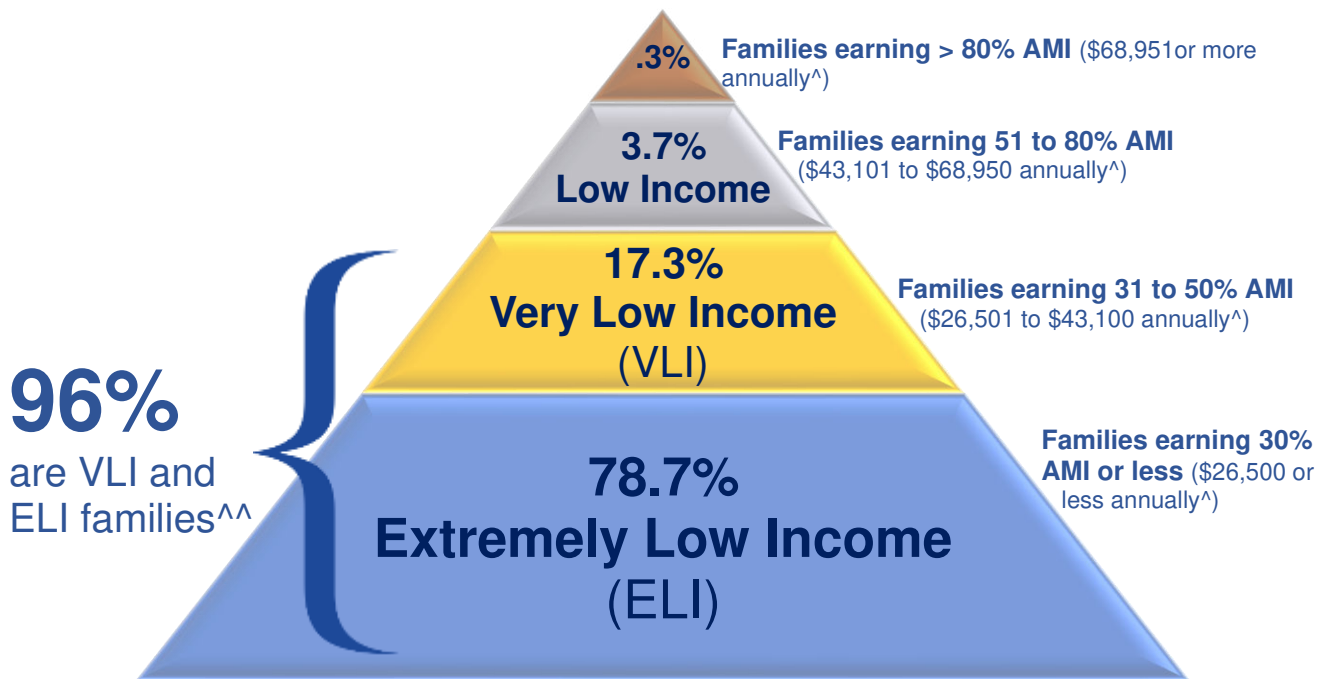
## 733 Net New Households



## 26,507 Households Served in FY 2021

*\*HomeFlex is AH's Project-Based Rental Assistance Program; \*\*TBV = Tenant-Based Voucher; \*\*\*DPA = Down Payment Assistance*

### Assisted Households Breakdown by Area Median Income (AMI)^



*^Source: HUD Income Limits: Atlanta-Sandy Springs-Roswell GA Metro FMR Area. Approved April 2021 for a Family of Four.*

*^^Source: Data Reporting and Analysis.*

## Highlights

- **Assisted 295 homeless** individuals and families.
- **Added or preserved 674 affordable housing units:**
  - Preserved 544 units:
    - Renewed 4 agreements with 184 existing Standard HomeFlex units.
    - Renewed 3 agreements with 211 existing HomeFlex Older Persons units.
    - Renewed 5 agreements with 149 existing HomeFlex Supportive Housing units.
  - Created 130 new units:
    - Executed Standard HomeFlex Agreement: Springview Apartments, 24 units.
    - Executed Standard HomeFlex Older Persons Agreement: Herndon Square Senior, 97 units.
    - Executed HomeFlex Supportive Housing Agreement: Dwell at Alcove, 9 units.
- Assisted in redeveloping **200 units at London Townhomes** (308 Scott Street) to majority affordable. Facilitated efforts to achieve 15% occupancy. Transitioned **56 unit Capitol View** (1191 Metropolitan Pkwy) from development phase to lease-up phase.
- **Assisted 261** first time homebuyers **with down payment assistance.**
- **Completed 3 rehabilitation projects** (596 units) under RAD to improve and modernize facilities:
  - Marietta Road Senior Tower (129 units)
  - Peachtree Road Senior Tower (196)
  - Villages at East Lake Redevelopment I & II (91 & 180)
- Designed/**updated Homeownership Initiative Plan.**
- **Accepted 202 Emergency Housing Vouchers** (EHVs) for initial 18-month period.
- **Safeguarded AH-assisted families and AH staff** under challenging conditions posed by the COVID-19 pandemic beginning March 2020 (FY 2020) through submission of this Report and into the next fiscal year (FY 2022).



## New Initiatives Established in FY 2021

Newly introduced initiatives included:

- **Establishing a technology-based training program--Achieving Connectivity to Create Equity, and Self-Sufficiency (ACCESS),** for AH-assisted families.
- **Supporting programs for chronically homeless populations** by reallocating under-utilized vouchers to specific programs that provide direct assistance.
- **Creating “AHGreen,”** AH’s environmental sustainability initiative, where AH advanced plans to reduce its carbon emissions and environmental impact, recognizing that climate change disproportionately affects low-income families.

## The Impact of Coronavirus (COVID-19)

Through passage of the Coronavirus Aid, Relief, and Economic Security Act (CARES Act), HUD provided Regulatory Waivers<sup>4</sup> in an effort to keep rental assistance programs operating under normal business conditions. AH followed HUD’s guidance and elected to utilize some COVID-19 Waivers. Most COVID-19 Waivers expire December 31, 2021. AH includes a list of waivers that it utilized or planned to use in FY 2021 in the Appendix E: Other Information section (see page 117) of this report.

<sup>4</sup> Outlined in Notice PIH 2020-05

## Ib. INTRODUCTION: FY 2021 ACCOMPLISHMENTS

The following pages highlight short-term goals and objectives (G&Os) achieved by AH during FY 2021. Although AH operates holistically under MTW, AH makes every effort to separate MTW Activities from non-MTW Activities.

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

FY 2021 actions and accomplishments that align with MTW Statutory Objectives are as follows:

#### MTW Goal 1: Cost Efficiency or Effectiveness

- **Suspended or relaxed enforcement measures** on MTW Activities in alignment with COVID-19 protocols including:
  - AW.2005.01 – Minimum Rent
  - HC.2007.01 – Re-Engineering the Housing Choice Voucher (HCV) Program
  - HC.2007.02 – Rent Reasonableness
  - HC.2011.02 – HCV Program Housing Assistance Payment (HAP) Abatement Policy
  - AW.2008.01 – Rent Simplification/AH Standard Deductions
- **Consolidated fixed income MTW Activities<sup>7</sup>** into one.
  - Elderly Income Disregard and Non-Elderly Income Disregard offered the same incentive, so they were merged into AW.2005.02 – Earned Income Disregard
- Began consideration of enhancement concepts to existing MTW Activities. Preliminary concepts included:
  - Deploying the latest construction technology to increase affordable housing choices.
- **Closed out** obsolete or never implemented **MTW Activities<sup>7</sup>**:
  - SH.2005.08 – Independent Living Demonstration
  - RE.2012.01 – Single Family Home Rental
  - PH.2017.01 – Elimination of Flat Rent
  - SH.2017.01 – Next Step Youth Self-Sufficiency Program

#### MTW Goal 2: Incentive for Working Families

- **Paused enforcement measures** on MTW Activities influenced by the nationwide eviction moratorium. MTW Activity examples include:
  - AW.2005.03 – Work/Program Requirement
  - HD.2005.05 – Good Neighbor Program II
  - HD.2005.06 – Human Development Services
  - PH.2011.03 – Aging Well Program

### MTW Goal 3: Increased Housing Choice

- Utilized COVID-19 Waivers<sup>5</sup> to **alternate service delivery** included in the following activities:
  - HC.2005.04 – Enhanced Inspection Standards:
    - Conducted 9,049 virtual Housing Quality Standards (HQS) Inspections for units under the HCV and HomeFlex Programs.
      - Conducted 738 initial HQS inspections on HCV and HomeFlex units.
      - Conducted 209 quality control (QC) inspections on HCV and HomeFlex units.
      - Conducted 1,616 special HQS inspections on HCV and HomeFlex units.
- **Assisted 295 households experiencing homelessness**
  - SH.2005.09 – Develop Alternate and Supportive Housing Resources.
- Advanced pipeline projects during FY 2021:
  - RE.2005.10 – Revitalization Program.
  - RE.2005.11 – Gap Financing.
- **Added or preserved 674 affordable housing units:**
  - Preserved 544 units - RE.2006.02 – HomeFlex Site-Based On-site Administration:
  - Created 130 new units - RE.2007.04 – HomeFlex as a Strategic Tool:
- **Assisted 261 new homeowners** with down payment assistance.
  - RE.2007.03 – Comprehensive Homeownership Program:
    - 43 (16.5%) of new homeowners assisted were from the education profession.
    - 25 (9.6%) of new homeowners assisted were from the healthcare industry.
    - 6 (2.3%) of new homeowners assisted were from the public safety field.
- Evaluated MTW Activities for future introduction:
  - Creation of modified construction cost limitations.
  - Addition of Choice Neighborhoods down payment assistance program.

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<sup>5</sup> AH reports on all MTW Activities under Section IV of this report.

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

### Housing

#### *Housing Development*

- Advanced development and redevelopment projects through respective construction phases, such as predevelopment, financial closing, construction, and lease-up. Project status includes:



- Completion of 97 unit Herndon Square Senior (500 Northside Drive).
  - Submitted application for Scholars Landing IC to the Special Application Center (SAC).
  - Extended the closing date for 72 unit Scholars Landing IC (Atlanta Student Movement Blvd.) to early July 2021 (FY 2022).
  - All other planned acquisitions, dispositions, demolitions, and ground leases remained in-progress or a pending status at the end of FY 2021.
- Increased activity to advance the design of a short-term Construction Loan Program in cooperation with Urban Revitalization Demonstration (URD).
    - Continued to seek co-investment opportunities that are mutually beneficial while improving the program's design and effectiveness.

#### *Housing Preservation*

- Preserved affordability for 200 units at London Townhomes (308 Scott Street); achieved 15% occupancy.
- Transitioned 56 unit Capitol View (1191 Metropolitan Pkwy) to marketing and lease-up.
- Began assessments of communities that have an approved Commitment to Enter into a Housing Assistance Payments Contract (CHAP).
  - **Completed 3 rehabilitation projects** (596 units) to meet RAD conversion requirements:
    - Marietta Road Senior Tower (129 units)
    - Peachtree Road Senior Tower (196)
    - Villages at East Lake Redevelopment I & II (91 & 180)
- AH elected to utilize the alternative Choice Mobility option, which limits turnover vouchers for RAD PBV families to a three-quarter commitment.
  - During FY 2021, **3 RAD PBV families expressed interest** in exercising their choice mobility. AH placed these families on the RAD PBV waiting list (turnover vouchers).
- Targeted homes in the West Highlands (formerly Perry Homes) development project.
- Provided four Owner-Occupied Rehabilitation (OOR) assistance awards with plans to resume the remaining awards as soon as pandemic conditions permit safe resumption of in-person contact.

## Housing Administration

- Began installation of dual (smoke and carbon monoxide) detectors at subsidized units.
- Continued to work collaboratively with property-manager developers (PMDs) to enforce the Smoke Free Policy at AH-Owned communities.
- Administered centralized rental assistance program at AH-Owned and Mixed Communities.
  - Public Housing: oversaw management operations of 2,823 units.
  - RAD PBV: monitored the financial operations of 1,340 project-based voucher units.
  - Local, Non-Traditional Housing: monitored financial operations of 2,669 local-income tax credit (LIHTC) units
  - HomeFlex Housing: oversaw administration of 7,702 project-based vouchers.
  - Continued to refine the HomeFlex Program rent criteria to ensure equitableness and attractiveness to private property owners while being financially sustainable for AH.
- Deployed COVID-19 Waivers to delay updating Utility Allowance (UA) Schedules.
- Continued **voluntary participation in the NSPIRE<sup>6</sup> Demonstration Program** at Ashley CollegeTown I (formerly Harris Homes).
- Updated the Choice Neighborhoods Implementation Grant (CNIG) Housing Plan, including:
  - Advancing redevelopment plans.
  - Engaging third-party consultants.
  - Assessing the need to reconfigure affordable replacement units across the remaining development phases.
- Monitored two site-based waiting lists<sup>7</sup> for 135 units at Scholars Landing to ensure application of former University Homes (FUH) residents' Right to Return.
- Administered de-centralized rental assistance program of more than 11,359 housing choice vouchers (HCV) across a tenant-based platform inside and outside of AH's service jurisdiction.
  - Tenant-Based Vouchers (TBVs): administered 9,850 inside and outside of Atlanta.
  - HCV Homeownership: continued supportive resources for 17 homeownership vouchers.
  - Special Purpose Vouchers (SPVs): oversaw the referral process of 1,492 vouchers dedicated to assist specific, at-risk population groups. To address underutilization or to meet SPV needs or requirements, AH reallocated TBVs, which included the following:
    - Housed 89 of 100 SPVs designated for the COVID Rapid Supportive Housing Program (CRSHP).
    - Housed 381 of 450 SPVs committed to FLOW for households that qualified for independent living and "light touch" case management.
    - Housed 307 of 300 Family Unification Program (FUP) SPVs.
    - Housed 94 of 100 SPVs obligated for the Housing First Voucher (HFV) Program
      - HFVs are in response to the closing of Peachtree and Pine Men's shelter.
    - Housed 27 of 32 reallocated SPVs for Integrated Care Permanent Supportive Housing (ICPSH) Program.
    - Housed 184 of 175 SPVs dedicated to the Near-Elderly, Disabled (formerly Mainstream One) Program
    - Housed 73 of 73 SPVs dedicated to the Mainstream Five (MS5) Program.
    - Housed 19 of 21 SPVs for RISE Permanent Supportive Housing Program.
    - Housed 49 of 100<sup>8</sup> Special Program Voucher for Homeless Students (SPVHS) or Atlanta Public Schools (APS) Vouchers.
    - Housed 242 of 270 SPVs designated for the Veterans Affairs Supportive Housing (VASH) Voucher Program.
    - **Accepted 202 Emergency Housing Vouchers (EHVs)** for initial 18-month period.
      - Base award of 143 EHVs plus 59 additional vouchers requested by AH.

<sup>6</sup> National Standards for the Physical Inspection of Real Estate (NSPIRE)

<sup>7</sup> Ashley IA and IB

<sup>8</sup> AH delayed adding 25 vouchers (up to 100-voucher commitment) until FY 2022 or later because of the resources committed or provided in response to COVID-19 pandemic.

- Designed/**updated Homeownership Initiative Plan**.
- Set clearer green policies, leading with AH-Owned properties, to **move development partners towards green construction materials and techniques**, which aligns with AHGreen, AH's environmental sustainability initiative.

### Self-Sufficiency

AH canceled many in-person events to align with COVID-19 protocols. The listing below reflects AH-sponsored and AH-supported self-sufficiency events held during the reporting period:

#### Education and Student Achievement

- Marketed scholarship opportunities through Housing Authority Insurance Group (HAI Group), Atlanta Community Scholars Award (ACSA), University Choice Neighborhood Scholarship (UCNS), and other scholarship opportunities to 2,631 AH households with college-aged youth<sup>9</sup>.



Literary Resources

- Provided access to books for 2,500 households through Literary Resources activities, a collaborative effort with Atlanta Book Rich Environments (BRE) Program, the National Book Foundation, Atlanta Fulton County Library, and other partners.
- Continued to facilitate “Building Blocks for Success”, which supports the PEOPLE element of AH’s Choice Atlanta Initiative. This program works closely with the four Atlanta Public Schools (APS) fed by Choice Atlanta neighborhoods.
- Oversaw the delivery of supportive services by University Choice Neighborhoods (UCN) Case Managers and service provider partners to connect individuals and families to early childhood development, after-school, summer, and STEM/STEAM programming, college preparatory, and continuing education.

#### Family Independence

- Assisted the first cohort of Achieving Connectivity to Create Equity, and Self-Sufficiency (ACCESS) “graduates” with employment opportunities through our partnership.
  - 7 of 9 participants completed the initial 10-week class (ended May 2021).
  - 6 of the 7 “graduates” accepted employment (1 remained with their current employer).
  - AH will offer another cohort during FY 2022.
- Connected 192 AH program participants to local and metro area employment opportunities.
- Provided 329 AH program participants with ongoing support and coaching to help program participants navigate and resolve job-related challenges.
- Provided rising seniors, recent high school graduates, and new college students assisted by AH with work experience through AH’s Summer Internship Program.
- Worked closely with service providers to teach or improve essential skills and employment preparation or training:
  - Enrolled 567 AH program participants in adult literacy, GED, and post-secondary opportunities, job training and skills development, entrepreneurial training, or coaching sessions to increase participants’ employment marketability.
- Through its 5-Star Tenant Program, AH provided 12 financial workshops and approximately 100 1-on-1 individual coaching sessions on asset building, banking, budget development, credit, and other financial topics to 35 AH program participants.
- Provided life skills training and support groups for 658 participants. These virtual events provided information, and generated referrals to partner agencies, including Mercy Care, Fulton County Board of Health, and youth services providers.

<sup>9</sup> AH defines this group as youth aged 17 to 23 years old.

- Worked closely with community partners to provide learning opportunities through life skills workshops, after-school programming, and summer camps for 402 AH-assisted households.
- Advanced program design under AHGreen for workforce training for clean energy jobs.
- Oversaw the delivery of supportive services by University Choice Neighborhoods (UCN) Case Managers and service provider partners to connect individuals and families to workforce development and employment.

### **Health and Wellness**

- Held Senior’s Farmers’ Market virtually to distribute fruits and vegetables, hold healthy cooking demonstrations, and engage attendees with live entertainment and games.
  - Virtual programming for 637 residents.
  - Provided 550 boxes of produce throughout AH-Owned communities.
- Facilitated the delivery of 49 activities/events, such as Fitness in the Parking Lot, virtual crafting, and a Senior Wellness and Resource Fair, which served a cumulative total of 12,642 seniors.
- Collaborated with community partners to provide 230 seniors with home and community-based services, including the delivery of 15,441 meals directly to seniors in their homes.
- Focused on the wellbeing of AH’s senior population via Zoom and Facebook Live platforms:
  - 87 participants attended the Annual Senior Wellness & Resources Fair.
  - In collaboration with Kaiser Permanente, AH presented 2 events that drew 1,865 participants:
    - COVID-19
    - Healthy Living and Stress Management.
- Provided a socially distanced guided workout for 181 senior residents.
- Oversaw the delivery of supportive services by University Choice Neighborhoods (UCN) Case Managers and service provider partners to connect individuals and families to coaching and counseling, health and wellness, and aging-in-place activities.

### **Health and Wellness – COVID-19 Education**

- AH confirmed 85 cases of exposure to COVID-19 among Public Housing residents, AH staff, and third-party contractors. AH did not track exposure cases among Housing Choice participants.
- Provided COVID-19 vaccinations with offsite and **onsite clinics**:
  - 105 residents from 6 communities received both doses of the vaccination through offsite clinics.
  - 349 residents and staff received both doses of the vaccination onsite at 11 communities in Phase 1a.
  - 139 residents and staff received the first dose of the vaccination onsite at 6 communities in final phase of FY 2021.
- Disseminated information about COVID-19 vaccine via monthly e-newsletters, flyers, e-mail and phone blasts, etc.
- Maintained constant contact with AH-assisted families and increased access to service providers and resources for AH-assisted residents:
  - AH remained open operationally and maintained a full-service contact center.
  - Paused enforcing corrective measures and granted voucher extensions.
  - Created COVID-19 Rapid Supportive Housing Program (CRSHP) by using 100 underutilized vouchers from other housing programs.
  - Facilitated non-perishable food delivery to 2,231 households in 13 communities.



### **Self-Sufficiency Programming Administration**

- Implemented efforts to increase community outreach within AH's service jurisdiction.
  - Established collaborative efforts with 14 agencies within AH's service jurisdiction.
  - Reached 5,078 households through AH's community engagement outreach programs.
- Worked closely with Partners for HOME<sup>10</sup>, utilizing HUD's Homeless Management Information System (HMIS) to facilitate housing for properly referred families.
- Oversaw and worked collaboratively with the City of Atlanta, Atlanta Public Schools, and other community partners in the administration of resources for AH households.

### **Administration**

- Continued implementation of the HUD-approved Critical Community Improvements (CCI) Plan. The plan utilizes all available funding sources<sup>11</sup> to acquire properties, provide rehabilitation assistance for low-income homeowners, and to increase or contribute to place-making enhancements throughout the UCN.
- Provided place-making enhancements to improve UCN neighborhood corridors. Enhancement examples include planters, landscaping, artwork, streetscape and resurfacing, decorative bus stop shelters, and other enhancements.
- **Completed the adaptive reuse study of historic Roosevelt Hall**, the only remaining building of University Homes.
  - Continued to evaluate potential uses for Roosevelt Hall, including office space, community space, retail, a life-long learning and technology center, an urban garden, and a wellness pavilion.
- Increased AH's diversity efforts, including recruitment from AH's assisted population, increased outreach efforts to Atlanta's Hispanic and Latino populations, and recognition for companies that already employ a workforce that meets Section 3 definitions.
- Implemented a Choice Neighborhood **Planning Grant of \$450,000 for Bowen Homes**.
- AH utilized CARES Act funding to assist program participants behind on their rental obligations and other COVID-19 related hardships.
- Managed AH Cares, AH's volunteer program, which provides team members with the opportunity to volunteer in AH-sponsored events. 179 volunteers (71 unique) allocated 737.5 hours for volunteer activities.
- Implemented AH's Over-Income Limit Policy pursuant to Housing Opportunity Through Modernization Act (HOTMA), Section 103 requirements.



<sup>10</sup> Serves as Atlanta's Continuum of Care

<sup>11</sup> Sources may include CNIG, City of Atlanta, MTW funds, and other appropriate funding sources

## Long-Term Goals and Objectives - Progress

The following pages highlight achieved long-term goals and objectives (G&Os) and AH's overall progress of other longer-termed G&Os during FY 2021. AH defines long-term G&Os as activities and projects that will take more than 12 months, and up to 60 months (multiple fiscal years), to accomplish.

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

The following reflect AH's progress on long-term G&Os during the reporting period (July 1, 2020 - June 30, 2021):

- **AH closely monitored changes to its Work/Program Requirement** to evaluate the need for future changes. Monitored metrics included:
  - Job stabilization success,
  - Program compliance rates,
  - Annual earned income changes, and
  - Other factors.
- Extended the **review of existing MTW Activities to identify obsolete or poorly performing MTW Activities** for revision or closeout beginning in FY 2023 due to changes in agency operations or new HUD guidance.
- Extended the vetting process on potential MTW Activities:
  - Initiated design of Simplified Utility Allowance (UA) Schedules, with an eye toward potential implementation in FY 2023.

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

Below, AH highlights long-term G&Os that do not require MTW flexibility to administer or implement. AH's efforts during the reporting period (July 1, 2020 – June 30, 2021) are as follows:

### Housing

- Continued to research alternative funding structures that would permit AH participation in HomeFlex projects under different roles to attract, create, or preserve affordable housing units.
  - Preliminary roles may include acting as a lender, loan servicer, or development partner, either before, during, or after the applicable transaction.
- Postponed utilization of AH's HCV Waiting List to fill HomeFlex units.
- Continued planning the conversion of AH's remaining public housing units to long-term Section 8 assisted project-based voucher (PBV) units under the Rental Assistance Demonstration (RAD) Program.
  - Most communities with public housing units have an approved Commitment to Enter into a Housing Assistance Payments Contract (CHAP).
- Continued to advance the affordability structure for AH's Homeownership Program.
- Evaluated long-term capital needs for AH-Owned facilities in the event that AH does not convert communities under the RAD Program.
- Advanced Scholars Landing Phase IV (Ashley II), which includes supportive activities master planned by Integral Community Development, financial closing, and submission of Low-Income Housing Tax Credit (LIHTC), tax exempt, or new market tax credit applications.
- Continued to support activities to advance Scholars Landing Phase V (Homeownership), which may include supporting public improvements and other predevelopment activities carried out by Integral Community Development.
- Reviewed supportive housing program performance to designate or repurpose tenant-based vouchers to align with program demands.
- Continued evaluating portal platform for program participants.
- Continued to prepare a Real Estate Processes, Procedures, and Standard Development Guidelines document for agency-wide reference.
- Continued to advance private-public development partnerships or alternate development models. AH continues to monitor the strength of real estate and financial markets and available funding in pursuit of the following projects:
  - Development Phase
    - University Choice Neighborhoods
    - West Highlands Homeownership
  - Pre-Development Phase
    - Mechanicsville Homeownership – pre-development
    - Englewood – active planning and pre-development
  - Active Planning Phase
    - Bowen Homes – active planning
    - North Avenue/U Rescue – active planning; Request for Proposal (RFP) issued
    - Palmer House – active planning; RFP issued
  - Preliminary Planning Phase
    - Bankhead Courts – preliminary planning
    - Herndon Square, Phases III – V – preliminary planning
    - Hollywood Courts – preliminary planning
    - Thomasville Heights – preliminary planning
  - Acquisition Phase
    - Chosewood Park II - acquisition

- Ongoing advancement of Community Development within the 10-year Real Estate Plan:
  - Development of more than 400 acres of AH-Owned land in the city of Atlanta:
    - Approximately 160 acres (40%) have an assigned development partner
    - Approximately 240 acres (60%) do not have an assigned development partner
  - Advanced active development projects within the project pipeline:
    - Ashley II
    - Herndon Square Phase II
- Continued analysis of Local Blended Subsidy, (adding Section 9 public housing units and converting under RAD).
  - AH is working to identify which opportunity is best suited for a pilot program.

### **Self-Sufficiency**

- Continued to explore the collection of data and research incentive programs to increase resident employment and wage earnings, including assistance for training-related expenses, education, and employment. Incentive concepts include income disregards, short-term transportation and childcare assistance, computers, payment of GED testing, purchase of work uniforms and tools, and other services that enhance the quality of life for Scholars Landing and UCN residents.
- Pursued Connect Home and other mediums to provide internet access to eligible residents.
- Continued exploration of incentives and programs that motivate younger program participants.
  - Resumed plans to add a Youth Leadership Program to compliment paid internship slots.
  - Began discussions of AH-supported college campus visits for AH-assisted youth in order to boost college enrollment.

### **Administration**

- Promoted residential and commercial growth in the University Choice Neighborhoods area through collaborative efforts with Choice Neighborhood partners.
- Continued to assess proposed strategic investments to attract and retain residents and to support community serving facilities and projects that enhance public safety.
- Developed implementation and enforcement protocols for AH's new Section 3 requirements.
- Advanced AHGreen activities to further AH's environmental sustainability commitment.
  - Preliminary concepts continue to focus on AH-Owned land to serve as a solar farm.
  - Future concepts may include attaching panels to AH-Owned buildings.

## II. GENERAL OPERATING INFORMATION

### A. Housing Stock Information

#### i. Actual New Project Based Vouchers

Tenant-based vouchers that the MTW PHA project-based 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) was 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 NEWLY PROJECT-BASED (Planned*)	NUMBER OF VOUCHERS NEWLY PROJECT-BASED (Actual)	STATUS AT END OF PLAN YEAR**	RAD?	DESCRIPTION OF PROJECT
Barge Road	129	0	Committed	Yes	PH unit conversion in AH-Owned Community to PBV units under RAD – extended to FY 2022
Columbia Village	30	0	Committed	Yes	PH unit conversion in Mixed Community to PBV units under RAD – extended to FY 2022
Dwell at Alcove	0	9	Leased/Issued	No	PBV unit creation under AH's HomeFlex Supportive Housing Program (HAVEN)
Herndon Square Senior	0	97	Leased/Issued	No	PBV unit creation under AH's Standard HomeFlex Older Persons Program
Hightower Manor Highrise	129	0	Committed	Yes	PH unit conversion in AH-Owned Community to PBV units under RAD – extended to FY 2022
Spring View Apartments	0	24	Leased/Issued	No	PBV unit creation under AH's Standard HomeFlex Program
Villages at Castleberry Hills II	114	0	Committed	Yes	PBV unit conversion in Mixed Community to PBV units under RAD – extended to FY 2022
<b>Total: Planned or Actual Newly Project- Based</b>	<b>402</b>	<b>130</b>			

\* Figures in the "Planned" column should match the corresponding Annual MTW Plan.

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

**Please describe differences between the Planned and Actual Number of Vouchers Newly Project-Based:**

AH attributes the difference between the planned and actual number of vouchers newly project-based to various factors:

- AH planned to convert 402 public housing (PH) units to project-base voucher (PBV) units under the Rental Assistance Demonstration (RAD) Program in FY 2021. Pandemic protocols influenced the timing of RAD application submissions, approvals, and property closings, which ultimately caused delays.
- Similarly, AH anticipated rehabilitation or modernization project completions or agreement execution under the Standard HomeFlex or HomeFlex Supportive Housing (HAVEN) Programs for 658 units at 13 communities in FY 2021; however, pandemic protocols caused project delays. Of the 658 delayed units, 130 units at 3 communities met requirements to execute an agreement by the end of FY 2021. The remaining units will rollover to FY 2022.

AH continues to maintain a project schedule in which AH plans to remove PH units from its rental portfolio by converting eligible PH units to PBV units through the RAD Program. In addition, AH maintains a pipeline of HomeFlex projects, where AH creates PBV units by agreement with local housing partners for eligible families, older persons, and those needing supportive housing.

**ii. Actual 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 was in place by the beginning of the Plan Year. Indicate whether the unit is included in RAD.

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS (Planned*)	NUMBER OF PROJECT-BASED VOUCHERS (Actual)	STATUS AT END OF PLAN YEAR**	RAD ?	DESCRIPTION OF PROJECT
Adamsville Green	35	35	Leased/Issued	No	PBV unit creation under AH's Standard HomeFlex Program
Adamsville Green	46	46	Leased/Issued	No	PBV unit creation under AH's HomeFlex Supportive Housing Program (HAVEN)
Arcadia at Parkway Village	116	116	Leased/Issued	No	PBV unit creation under AH's Standard HomeFlex Program
Ashley Auburn Pointe I	8	8	Leased/Issued	No	PBV unit creation under AH's Standard HomeFlex Program
Ashley I at Scholars Landing	0	54	Leased/Issued	No	PBV unit creation under AH's Standard HomeFlex Program
Ashton at Browns Mill	74	74	Leased/Issued	No	PBV unit creation under AH's Standard HomeFlex Program
Ashton at Browns Mill	5	5	Leased/Issued	No	PBV unit creation under AH's HomeFlex Supportive Housing Program (HAVEN)
Atrium at CollegeTown	114	114	Leased/Issued	No	PBV unit creation under AH's Standard HomeFlex Program
Auburn Glen	108	108	Leased/Issued	No	PBV unit creation under AH's Standard HomeFlex Program
Avalon Park Family	53	53	Leased/Issued	No	PBV unit creation under AH's Standard HomeFlex Older Persons Program
Avalon Park Senior	136	136	Leased/Issued	No	PBV unit creation under AH's Standard HomeFlex Program (Older Persons)

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS (Planned*)	NUMBER OF PROJECT-BASED VOUCHERS (Actual)	STATUS AT END OF PLAN YEAR**	RAD ?	DESCRIPTION OF PROJECT
Avalon Ridge Family	89	89	Leased/Issued	No	PBV unit creation under AH's Standard HomeFlex Program
Brightstone at DeKalb Medical Parkway	0	175	Leased/Issued	No	PBV unit creation under AH's Standard HomeFlex Program
Campbell Stone	201	201	Leased/Issued	No	PBV unit creation under AH's Standard HomeFlex Program
Capitol Gateway II	16	16	Leased/Issued	No	PBV unit creation under AH's Standard HomeFlex Program
Centennial Place I	74	74	Leased/Issued	No	PBV unit creation under AH's Standard HomeFlex Program
Centennial Place II	70	70	Leased/Issued	No	PBV unit creation under AH's Standard HomeFlex Program
Centennial Place III	74	74	Leased/Issued	No	PBV unit creation under AH's Standard HomeFlex Program
Centennial Place IV	83	83	Leased/Issued	No	PBV unit creation under AH's Standard HomeFlex Program
Columbia Colony Senior	62	62	Leased/Issued	No	PBV unit creation under AH's Standard HomeFlex Older Persons Program
Columbia Commons	15	15	Leased/Issued	No	PBV unit creation under AH's Standard HomeFlex Program
Columbia Commons	0	48	Leased/Issued	Yes	PH unit conversion in Mixed Community to PBV units under RAD Program
Columbia Estates	0	50	Leased/Issued	Yes	PH unit conversion in Mixed Community to PBV units under RAD Program
Columbia Heritage	124	124	Leased/Issued	No	PBV unit creation under AH's Standard HomeFlex Program
Columbia High Point (Senior)	94	94	Leased/Issued	No	PBV unit creation under AH's Standard HomeFlex Program (Older Persons)
Columbia Mechanicsville Apartments	35	35	Leased/Issued	No	PBV unit creation under AH's Standard HomeFlex Program
Columbia Mechanicsville Apartments	0	62	Leased/Issued	Yes	PH unit conversion in Mixed Community to PBV units under RAD Program
Columbia Mechanicsville Parkside Apartments	32	32	Leased/Issued	No	PBV unit creation under AH's Standard HomeFlex Program
Columbia Mechanicsville Parkside Apartments VI	0	47	Leased/Issued	Yes	PH unit conversion in Mixed Community to PBV units under RAD Program

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS (Planned*)	NUMBER OF PROJECT-BASED VOUCHERS (Actual)	STATUS AT END OF PLAN YEAR**	RAD ?	DESCRIPTION OF PROJECT
Columbia Park Citi Residences at West Highlands	0	61	Leased/Issued	Yes	PH unit conversion in Mixed Community to PBV units under RAD Program
Columbia Senior Residences at Blackshear	77	78	Leased/Issued	No	PBV unit creation under AH's Standard HomeFlex Older Persons Program
Columbia Senior Residences at Edgewood	135	135	Leased/Issued	No	PBV unit creation under AH's Standard HomeFlex Older Persons Program
Columbia Senior Residences at Martin Luther King, Jr.	122	122	Leased/Issued	No	PBV unit creation under AH's Standard HomeFlex Older Persons Program
Columbia Senior Residences at Mechanicsville	81	81	Leased/Issued	No	PBV unit creation under AH's Standard HomeFlex Older Persons Program
Columbia Senior Residences at Mechanicsville Apartments	0	54	Leased/Issued	Yes	PH unit conversion in Mixed Community to PBV units under RAD Program
Columbia South River Gardens	51	51	Leased/Issued	No	PBV unit creation under AH's Standard HomeFlex Program
Columbia Sylvan Hills	76	76	Leased/Issued	No	PBV unit creation under AH's HomeFlex Supportive Housing Program (HAVEN)
Columbia Tower at Martin Luther King, Jr. Village	56	56	Leased/Issued	No	PBV unit creation under AH's Standard HomeFlex Program
Columbia Tower at Martin Luther King, Jr. Village	39	39	Leased/Issued	No	PBV unit creation under AH's HomeFlex Supportive Housing Program (HAVEN)
Constitution Avenue Apartments	67	67	Leased/Issued	No	PBV unit creation under AH's Standard HomeFlex Program
Crogman School Apartments	45	0	Leased/Issued	No	The Standard HomeFlex Agreement terminated during FY 2021. AH transitioned affected participants to its the HCV Program
Donnelly Courts	52	0	Leased/Issued	No	The HAVEN HomeFlex Agreement terminated during FY 2021. AH transitioned affected participants to its HCV Program.
Dwell at Alcove	0	9	Leased/Issued	No	PBV unit creation under AH's HomeFlex Supportive Housing Program (HAVEN)
Gateway at Capitol View	0	162	Leased/Issued	No	PBV unit creation under AH's Standard HomeFlex Older Persons Program

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS (Planned*)	NUMBER OF PROJECT-BASED VOUCHERS (Actual)	STATUS AT END OF PLAN YEAR**	RAD ?	DESCRIPTION OF PROJECT
Gateway at East Point	100	100	Leased/Issued	No	PBV unit creation under AH's Standard HomeFlex Program
GE Tower	189	189	Leased/Issued	No	PBV unit creation under AH's Standard HomeFlex Program
Heritage Green	44	44	Leased/Issued	No	PBV unit creation under AH's Standard HomeFlex Program
Heritage Station I	88	88	Leased/Issued	No	PBV unit creation under AH's Standard HomeFlex Program
Heritage Station II	150	150	Leased/Issued	No	PBV unit creation under AH's Standard HomeFlex Program
Herndon Square Senior	0	97	Leased/Issued	No	PBV unit creation under AH's Standard HomeFlex Older Persons Program
Imperial Hotel	90	90	Leased/Issued	No	PBV unit creation under AH's HomeFlex Supportive Housing Program (HAVEN)
Lakewood at Christian Manor	192	199	Leased/Issued	No	PBV unit creation under AH's Standard HomeFlex Program
Legacy at Vine City	0	105	Leased/Issued	No	PBV unit creation under AH's Standard HomeFlex Program
Lillie R. Campbell House	56	63	Leased/Issued	No	PBV unit creation under AH's Standard HomeFlex Program
Manor at Indian Creek II	0	75	Leased/Issued	No	PBV unit creation under AH's Standard HomeFlex Older Persons Program
Manor at Scott's Crossing	100	100	Leased/Issued	No	PBV unit creation under AH's Standard HomeFlex Older Persons Program
Marietta Road Senior Tower	0	129	Leased/Issued	Yes	PH unit conversion in AH-Owned Community to PBV units under RAD Program
Martin House at Adamsville	106	113	Leased/Issued	No	PBV unit creation under AH's Standard HomeFlex Program
Mechanicsville Crossing	30	30	Leased/Issued	No	PBV unit creation under AH's Standard HomeFlex Program
Mechanicsville Station	35	35	Leased/Issued	No	PBV unit creation under AH's Standard HomeFlex Program
Oasis at Scholars Landing	48	60	Leased/Issued	No	PBV unit creation under AH's Standard HomeFlex Older Persons Program
Odyssey at Villas	32	32	Leased/Issued	No	PBV unit creation under AH's HomeFlex Supportive Housing Program (HAVEN)
O'Hern House	76	76	Leased/Issued	No	PBV unit creation under AH's HomeFlex Supportive Housing Program (HAVEN)
Park Commons / Gates Park	130	130	Leased/Issued	No	PBV unit creation under AH's Standard HomeFlex Program
Park Commons / Gates Park	22	22	Leased/Issued	No	PBV unit creation under AH's HomeFlex Supportive Housing Program (HAVEN)

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS (Planned*)	NUMBER OF PROJECT-BASED VOUCHERS (Actual)	STATUS AT END OF PLAN YEAR**	RAD ?	DESCRIPTION OF PROJECT
Park Commons / Gates Park	110	110	Leased/Issued	No	PBV unit creation under AH's Standard HomeFlex Program
Park Commons / Gates Park	19	19	Leased/Issued	No	PBV unit creation under AH's HomeFlex Supportive Housing Program (HAVEN)
Peachtree Road Senior Tower	0	196	Leased/Issued	Yes	PH unit conversion in AH-Owned Community to PBV units under RAD Program
Peaks at MLK	73	73	Leased/Issued	No	PBV unit creation under AH's Standard HomeFlex Program
Phoenix House	44	44	Leased/Issued	No	PBV unit creation under AH's HomeFlex Supportive Housing Program (HAVEN)
Piedmont Road Highrise	208	207	Leased/Issued	Yes	PH unit conversion in AH-Owned Community to PBV units under RAD Program
Providence Parkway Village	50	50	Leased/Issued	No	PBV unit creation under AH's Standard HomeFlex Program
Quest Village III	10	10	Leased/Issued	No	PBV unit creation under AH's HomeFlex Supportive Housing Program (HAVEN)
Retreat at Edgewood	40	40	Leased/Issued	No	PBV unit creation under AH's Standard HomeFlex Program
Reynoldstown Senior Residences	26	26	Leased/Issued	No	PBV unit creation under AH's Standard HomeFlex Older Persons Program
Seven Courts	30	30	Leased/Issued	No	PBV unit creation under AH's HomeFlex Supportive Housing Program (HAVEN)
Spring View Apartments	0	24	Leased/Issued	No	PBV unit creation under AH's Standard HomeFlex Program
Sterling at Candler Village	0	170	Leased/Issued	No	PBV unit creation under AH's Standard HomeFlex Program
Summerdale Commons	0	50	Leased/Issued	No	PBV unit creation under AH's Standard HomeFlex Program
Summit Trail	40	40	Leased/Issued	No	PBV unit creation under AH's HomeFlex Supportive Housing Program (HAVEN)
Tenth & Juniper Highrise	149	149	Leased/Issued	Yes	PH unit conversion in AH-Owned Community to PBV units under RAD Program
The Legacy at Walton Lakes	24	24	Leased/Issued	No	PBV unit creation under AH's Standard HomeFlex Program
The Remington Apartments	160	160	Leased/Issued	No	PBV unit creation under AH's Standard HomeFlex Program
The Renaissance at Park South – Senior	100	100	Leased/Issued	No	PBV unit creation under AH's Standard HomeFlex Older Persons Program
Veranda at Auburn Pointe	86	86	Leased/Issued	No	PBV unit creation under AH's Standard HomeFlex Program

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS (Planned*)	NUMBER OF PROJECT-BASED VOUCHERS (Actual)	STATUS AT END OF PLAN YEAR**	RAD ?	DESCRIPTION OF PROJECT
Veranda at Auburn Pointe II	98	98	Leased/Issued	No	PBV unit creation under AH's Standard HomeFlex Program
Veranda at Auburn Pointe III	102	102	Leased/Issued	No	PBV unit creation under AH's Standard HomeFlex Program
Veranda at Carver	90	90	Leased/Issued	No	PBV unit creation under AH's Standard HomeFlex Program
Veranda at CollegeTown	100	100	Leased/Issued	No	PBV unit creation under AH's Standard HomeFlex Program
Veranda at Groveway	74	74	Leased/Issued	No	PBV unit creation under AH's Standard HomeFlex Program
Veranda at Scholars Landing	100	100	Leased/Issued	No	PBV unit creation under AH's Standard HomeFlex Program
Villages at Castleberry Hill I	66	66	Leased/Issued	Yes	PH unit conversion in Mixed Community to PBV units under RAD Program
Villages at East Lake Redevelopment I & II	0	271	Leased/Issued	Yes	PH unit conversion in Mixed Community to PBV units under RAD Program
Villas of H.O.P.E.	36	36	Leased/Issued	No	PBV unit creation under AH's HomeFlex Supportive Housing Program (HAVEN)
Welcome House	41	41	Leased/Issued	No	PBV unit creation under AH's HomeFlex Supportive Housing Program (HAVEN)
Woodbridge at Parkway Village	98	98	Leased/Issued	No	PBV unit creation under AH's Standard HomeFlex Program
<b>Total: Planned and Actual Existing Project-Based</b>	<b>5,927</b>	<b>7,702</b>			

\* Figures and text in the "Planned" column should match the corresponding Annual MTW Plan.

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

**Please describe differences between the Planned and Actual Existing Number of Vouchers Project-Based:**

AH attributes the net difference (reflected under the “actual column”), between the planned and actual existing number of project-based vouchers to the following factors:

- In some cases, AH HomeFlex Agreements contain an “up to clause”, where communities with that option, exercised their “up to units” option during the unit turnover process. AH captures those instances in this Report.
- In other cases, AH anticipated an execution of agreements under the Standard HomeFlex and HomeFlex Supportive Housing Programs; however, pandemic protocols influenced the timing of agreement executions and caused these agreements to be finalized during FY 2021, rather than FY 2020 as originally planned.
- In most cases, AH expected to convert public housing units to PBV units under the RAD Program, but conversion delays caused by pandemic protocols caused conversion closings to occur during FY 2021, instead of FY 2020 as originally planned.
- Finally, there are instances of HomeFlex Agreement executions realized ahead of schedule, as well as property owners electing not to renew their HomeFlex Agreement.

All of the scenarios discussed contribute to the net increase in the number of PBV units added to AH’s rental assistance portfolio.

**iii. Actual Other Changes to MTW Housing Stock in 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.

**ACTUAL OTHER CHANGES TO MTW HOUSING STOCK IN THE PLAN YEAR**

During FY 2021, AH deferred some policy and regulation enforcement in response to the nationwide eviction moratorium, which limited attrition and affected the available housing stock. In addition, some substantial rehabilitation and significant modernization projects directly or indirectly associated with AH’s repositioning efforts of public housing units under RAD were delayed. Further, AH continued to exercise due diligence on prospective properties in line with AH’s business model and long-term vision. AH expects minimal housing changes once all pandemic protocols are lifted and organic attrition resumes. At that point, AH will resume unfinished rehabilitation and modernization projects.

#### iv. General Description of All Actual Capital Expenditures During the Plan Year

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

#### GENERAL DESCRIPTION OF ALL ACTUAL CAPITAL EXPENDITURES DURING THE PLAN YEAR

AH has established four priorities for Capital Improvements at AH-Owned facilities and residential communities:

1. Health and safety of residents,
2. Property viability,
3. Compliance, and
4. Redevelopment through RAD.

AH expended \$3.1MM for site and building improvements at 8 AH-Owned properties. Actual expenditures included upgrading access control and common areas by adding 23 card readers and reupholstering 96 chairs and 5 sofas. AH made an emergency replacement of 1 chiller while also replacing 850 range hood fire-stop-devices, and 538 dual detectors. AH added 2 relief dampers to resolve stairwell pressurization issues. In addition, AH made 70 PTAC/VTAC plumbing repairs, including the replacement of 5 outside water gate valves, repaired 1,578 square yards of parking lot asphalt, furnished and installed a new wheelchair accessible lift, and conducted an assessment to repair an estimated 100 concrete balconies.

AH made elevator improvements at 1 community, replaced flooring for 1 maintenance shop and several square feet of corridor, replaced 3 dumpsters, window seals, replaced 32 exterior doors, upgraded bathroom fixtures and plumbing apparatus for 32 bathrooms, initiated rehabilitation design and total asphalt repairs and maintenance for the entire Marian Road community.

Further capital expenditures included cleaning exhaust ventilation ducts, replacing or upgrading several fire voice evacuation and nurse call systems, replacing or upgrading breaker boxes, making foundation repairs to 4 buildings in 1 community, replacing playground equipment, and conducting environmental work and performing erosion control work consistent with a Green Physical Needs Assessment (PNA).

Other capital expenditures, such as buying furniture, fixtures, and other equipment, consistent with established priorities, also occurred during the reporting period. Listed below are the total actual capital expenditures per site:

- \$ 228,047 @ Cheshire Bridge Road Highrise
- \$ 194,847 @ Cosby Spear Highrise
- \$ 158,521 @ East Lake Highrise
- \$ 24,844 @ Georgia Avenue Highrise
- \$ 33,868 @ Hightower Manor
- \$1,970,950 @ Marian Road Highrise
- \$ 39,387 @ Martin Street Plaza
- \$ 471,597 @ Westminster

## B. Leasing Information

### i. Actual Number of Households Served

Snapshot and unit month information on the number of households the MTW PHA actually served at the end of the Plan Year.

NUMBER OF HOUSEHOLDS SERVED THROUGH:	NUMBER OF UNIT MONTHS OCCUPIED or LEASED* Planned^^	NUMBER OF UNIT MONTHS OCCUPIED or LEASED* Actual	NUMBER OF HOUSEHOLDS SERVED** Planned^^	NUMBER OF HOUSEHOLDS SERVED** Actual
MTW Public Housing Units Leased	26,076	33,876	2,173	2,823
MTW Housing Choice Vouchers (HCV) Utilized	231,912	228,732	19,326	19,061
Local, Non-Traditional: Tenant-Based	3,000	3,540	250	295
Local, Non-Traditional: Property-Based	32,040	32,208	2,670	2,669
Local, Non-Traditional: Homeownership	16,776	19,908	1,398	1,659
<b>Planned and Actual Totals:</b>	<b>309,804</b>	<b>318,084</b>	<b>25,817</b>	<b>26,507</b>

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

\*\* "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 (as shown in the Annual MTW Plan).

^^ Figures and text in the "Planned" column should match the corresponding Annual MTW Plan.

#### Please describe any differences between the planned and actual households served:

AH attributes the differences between the planned and actual households served to the following factors:

- Conversion of PH units to long-term Section 8 assisted PBV units;
- Lower than expected number of property owner partners signing a HAP Contract before July 1, 2020; and
- Reduction in HCV Homeownership households through attrition (AH is moving away from this program because of limited success).

AH has shifted its focus towards its more successful Down Payment Assistance Program. AH may revisit the HCV Homeownership Program later.

LOCAL, NON-TRADITIONAL CATEGORY	MTW ACTIVITY (NAME and NUMBER)	NUMBER OF UNIT MONTHS OCCUPIED or LEASED Planned^^	NUMBER OF UNIT MONTHS OCCUPIED or LEASED Actual	NUMBER OF HOUSEHOLDS SERVED Planned^^	NUMBER OF HOUSEHOLDS SERVED Actual
Tenant-Based	Developing Alternative and Supportive Housing Resources/SH.2005.09	3,000	3,540	250	295
Property-Based	Reformulating the Subsidy Arrangement. . . /RE.2005.09	13,020	12,972	1,085	1,081
Property-Based	HomeFlex Site-Based Administration/RE.2006.02	19,020	19,056	1,585	1,588

LOCAL, NON-TRADITIONAL CATEGORY	MTW ACTIVITY (NAME and NUMBER)	NUMBER OF UNIT MONTHS OCCUPIED or LEASED Planned^^	NUMBER OF UNIT MONTHS OCCUPIED or LEASED Actual	NUMBER OF HOUSEHOLDS SERVED Planned^^	NUMBER OF HOUSEHOLDS SERVED Actual
Homeownership	Comprehensive Homeownership Program/RE.2007.03	16,776	19,908	1,398	1,659
<b>Planned and Actual Totals</b>		<b>51,816</b>	<b>55,476</b>	<b>4,318</b>	<b>4,623</b>

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

^^ Figures and text in the "Planned" column should match the corresponding Annual MTW Plan.

HOUSEHOLDS RECEIVING LOCAL, NON-TRADITIONAL SERVICES ONLY	AVERAGE NUMBER OF HOUSEHOLDS PER MONTH	TOTAL NUMBER OF HOUSEHOLDS IN THE PLAN YEAR
N/A	N/A	N/A

## ii. Discussion of Any Actual Issues/Solutions Related to Leasing

Discussion of any actual issues and solutions utilized in the MTW housing programs listed.

HOUSING PROGRAM	DESCRIPTION OF ACTUAL LEASING ISSUES AND SOLUTIONS
MTW Public Housing	<p>AH continued its strategic leasing moratoriums connected to "checkerboarding" resident movement in order to complete planned rehabilitation projects, and dealt with leasing issues connected to the nationwide eviction moratorium. The COVID-19 pandemic limited property management activities, including lease-ups and evictions.</p> <p>Leasing issue solutions included utilizing HUD-approved COVID-19 Waivers to assist contracted property managers in overcoming some issues, and satisfying arrear accounts for assisted program participants.</p>
MTW Housing Choice Voucher	<p>AH continued efforts to recruit and retain property owner partners, especially those with one and two-bedroom units. In addition, AH dealt with issues connected to the nationwide eviction moratorium, which limited voucher management activities such as lease-ups, terminations, and HQS inspections.</p> <p>Leasing solutions included utilizing HUD-approved COVID-19 Waivers as guidance to assist property owners and manager partners in overcoming some issues, while satisfying arrear accounts for assisted program participants.</p>
Local, Non-Traditional	<p>During FY 2021 and the nationwide eviction moratorium, AH continued efforts to recruit and retain property owner partners willing to provide temporary to permanent supportive housing for a segment of the population at-risk of becoming or remaining homeless.</p> <p>AH actively marketed its Home Again and HAVEN Programs to address short-term and long-term solutions while continuing to add units to the housing stock.</p>

## C. Waiting List Information

### i. Actual Waiting List Information

Snapshot information on the actual status of MTW waiting lists at the end 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.	24,031	Closed	No
Choice Mobility Vouchers 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	Open	Yes
Site-Based Administration – HomeFlex and Mixed Communities	Community-wide unit WL for all population managed by property owners at the property level for nearly 6,000 units at 74 sites.	47,830	Closed	Yes

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

Because AH does not discourage families from applying to sites in which they are interested, AH acknowledges that there may be instances where families appear on multiple lists. For example, a family may appear on the MTW HCV wait list as well as a site-based list managed by property owners or 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.

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

Please describe any actual 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 ACTUAL CHANGES TO WAITING LIST
MTW Housing Choice Voucher	AH conducted periodic purges to this waiting list during FY 2021.
RAD Project-Based Voucher (Choice Mobility)	AH did not make any changes to this waiting list during FY 2021.
Site-Based – Assorted Properties	N/A since property managers maintain lists at the property level.

## D. Information on Statutory Objectives and Requirements

### i. 75% of Families Assisted Are Very Low Income

HUD will verify compliance with the statutory requirement that at least 75% of the households assisted by the MTW PHA are very low income for MTW public housing units and MTW HCVs through HUD systems. The MTW PHA should provide data for the actual families housed upon admission during the PHA's Plan Year reported in the "Local, Non-Traditional: Tenant-Based"; "Local, Non-Traditional: Property-Based"; and "Local, Non-Traditional: Homeownership" categories. Do not include households reported in the "Local, Non-Traditional Services Only" category.

INCOME LEVEL	NUMBER OF LOCAL, NON-TRADITIONAL HOUSEHOLDS ADMITTED IN THE PLAN YEAR
80%-50% Area Median Income	10
49%-30% Area Median Income	130
Below 30% Area Median Income	416
<b>Total Local, Non-Traditional Households Admitted</b>	<b>556</b>

### ii. Maintain Comparable Mix

HUD will verify compliance with the statutory requirement that MTW PHAs continue to serve a comparable mix of families by family size by first assessing a baseline mix of family sizes served by the MTW PHA prior to entry into the MTW demonstration (or the closest date with available data) and compare that to the current mix of family sizes served during the Plan Year.

#### BASELINE MIX OF FAMILY SIZES SERVED (upon entry to MTW)

FAMILY SIZE	OCCUPIED PUBLIC HOUSING UNITS	UTILIZED HCVs	NON-MTW ADJUSTMENTS*	BASELINE MIX NUMBER	BASELINE MIX PERCENTAGE
1 Person	2,564	2,209	0	4,773	36%
2 Person	466	1,939	0	2,405	18%
3 Person	354	2,014	0	2,368	18%
4 Person	284	1,629	0	1,913	14%
5 Person	350	1,591	0	1,941	14%
6+ Person	0	0	0	0	0%
<b>TOTAL</b>	<b>4,018</b>	<b>9,382</b>	<b>0</b>	<b>13,400</b>	<b>100%</b>

\* "Non-MTW Adjustments" are defined as factors that are outside the control of the MTW PHA. An example of an acceptable "Non-MTW Adjustment" would include demographic changes in the community's overall population. If the MTW PHA includes "Non-MTW Adjustments," a thorough justification, including information substantiating the numbers given, should be included below.

Please describe the justification for any "Non-MTW Adjustments" given above:

N/A
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**MIX OF FAMILY SIZES SERVED (in Plan Year)**

<b>FAMILY SIZE</b>	<b>BASELINE MIX PERCENTAGE**</b>	<b>NUMBER OF HOUSEHOLDS SERVED IN PLAN YEAR^</b>	<b>PERCENTAGE OF HOUSEHOLDS SERVED IN PLAN YEAR^^</b>	<b>PERCENTAGE CHANGE FROM BASELINE YEAR TO CURRENT PLAN YEAR</b>
<b>1 Person</b>	36%	10,408	49%	13%
<b>2 Person</b>	18%	4,433	21%	3%
<b>3 Person</b>	18%	2,909	13%	-5%
<b>4 Person</b>	14%	1,925	9%	-5%
<b>5 Person</b>	14%	1,035	5%	-9%
<b>6+ Person</b>	0%	728	3%	3%
<b>TOTAL</b>	<b>100%</b>	<b>21,438</b>	<b>100%</b>	<b>0%</b>

- \*\* The "Baseline Mix Percentage" figures given in the "Mix of Family Sizes Served (in Plan Year)" table should match those in the column of the same name in the "Baseline Mix of Family Sizes Served (upon entry to MTW)" table.
- ^ The "Total" in the "Number of Households Served in Plan Year" column should match the "Actual Total" box in the "Actual Number of Households Served in the Plan Year" table in Section II.B.i of this Annual MTW Report.
- ^^ The percentages in this column should be calculated by dividing the number in the prior column for each family size by the "Total" number of households served in the Plan Year. These percentages will reflect adjustment to the mix of families served that are due to the decisions of the MTW PHA. Justification of percentages in the current Plan Year that vary by more than 5% from the Baseline Year must be provided below.

**Please describe the justification for any variances of more than 5% between the Plan Year and Baseline Year:**

AH attributes the variances between the baseline and the plan year shown above to past methodology, where AH was unable to collect family size counts because AH privatized management of its public housing communities. In response, AH requested, and HUD approved AH to use bedroom sizes to establish the households served baseline and subsequent household served counts.

The bedroom size baseline or alternate methodology does include reasonable assumptions and projections, but it established an inaccurate representation of AH households served. AH has since collected and reported actual family sizes, but an annual variance will continue to show up because the alternate methodology "blends" the data. Unfortunately, any changes to "correct" the methodology at any juncture would affect AH's households-served count negatively by causing its household-served count to lose more than 3,000 households.

In addition to the alternate methodology, AH submits that other contributing factors to variances of more than 5% for the following family sizes may include:

- 1-Person Family: AH continues "right-sizing" over-housed families in concert with relocation activities in accordance with AH's Quality of Life Initiative (QLI). In addition, AH attributes the change in this category to the availability of units, thereby increasing AH's ability to house 1-person families.
- 5-Person Family: AH suggests that relocation activities related to project conversion under RAD or rehabilitation/modernization projects require "right-sizing" under-housed families, which is accomplished in accordance with AH's QLI efforts and may have contributed to the 9% change under this category. Further, AH also suggests a trickle-down effect related to described activities, as well as an increase of available units.

**iii. Number of Households Transitioned to Self-Sufficiency in the Plan Year**

Number of households, across MTW activities, that were transitioned to the MTW PHA's local definition of self-sufficiency during the Plan Year.

MTW ACTIVITY (NAME and NUMBER)	NUMBER OF HOUSEHOLDS TRANSITIONED TO SELF SUFFICIENCY*	MTW PHA LOCAL DEFINITION OF SELF- SUFFICIENCY
Earned Income Disregard/AW.2005.02	959	Elderly and Non-Elderly Disabled persons with earned income
Work/Program Requirement/AW.2005.04	277	Households moving from non-compliant with Work/Program Requirement to Compliant
Human Development Services/HD.2005.06	243	Households moving from non-compliant with Work/Program Requirement to Compliant
Aging Well Program/PH.2011.03	1,004	Households accessing services or resources needed to be engaged, active, and in control of decisions that affect their lives and the aging process Definition
	959	<i>(Households Duplicated Across MTW Activities)</i>
	565	<b>Total Households Transitioned to Self- Sufficiency</b>

\* Figures should match the outcome reported where metric SS#8 is used in Section IV of this Annual MTW Report.

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

“All proposed MTW activities that were granted approval by HUD are reported in Section IV as ‘Approved Activities’.”

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

### A. Implemented Activities

AH's MTW Activities				
Activity ID		Activity Name	Page	MTW Authorization(s) AH's Attachment D
AW	2005.01	\$125 Minimum Rent	41	Section I.O: General Conditions; setting rents and term limits
AW	2005.02	Earned Income Disregard	42	Sections I.O and VII.A.4: General Conditions and . . . Authorized to Create its own HCV Program
AW	2005.03	Work / Program Requirement	43	Section I.O: General Conditions Section IV: Self-Sufficiency/Supportive Services
HC	2005.04	Enhanced Inspection Standards	44	Section VII: Establishment of HCV Program
HD	2005.05	Good Neighbor Program II	46	Section IV: Self-Sufficiency/Supportive Services Section V: Single-Fund Budget with Full Flexibility
HD	2005.06	Human Development Services	47	Section IV: Self-Sufficiency/Supportive Services Section V: Single-Fund Budget with Full Flexibility
PH	2005.07	4 to 1 Elderly Admissions	48	Section III: Occupancy Policies Section IV: Self-Sufficiency/Supportive Services
SH	2005.09	Develop Alternate and Supportive Housing Resources	49	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	2005.09	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
RE	2005.10	Revitalization Program	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

<b>AH's MTW Activities</b>				
<b>Activity ID</b>		<b>Activity Name</b>	<b>Page</b>	<b>MTW Authorization(s) AH's Attachment D</b>
RE	2005.11	Gap Financing	53	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	54	Section VII: Establishment of HCV Program
RE	2006.02	HomeFlex Site-Based Administration	55	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	57	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	58	Section VII: Establishment of HCV Program
RE	2007.03	Comprehensive Homeownership Program	59	Section V: Single-Fund Budget with Full Flexibility
RE	2007.04	HomeFlex as a Strategic Tool	60	Section V: Single-Fund Budget with Full Flexibility Section VII.B: Simplification of the Process to Project-Base Section 8 Vouchers Section VII.C: Simplification of the Development and Redevelopment Process
AW	2008.01	Rent Simplification / AH Standard Deductions	62	Section I.O: General Conditions
HC	2008.02	Leasing Incentive Fee	64	Section VII: Establishment of HCV Program
PH	2008.03	Energy Performance Contracting	65	Section IX: Energy Performance Contracting
HC	2011.02	HCV Program Housing Assistance Payment Abatement Policy	66	Section VII: Establishment of HCV Program
PH	2011.03	Aging Well Program	67	Section IV: Self-Sufficiency/Supportive Services Section V: Single-Fund Budget with Full Flexibility
SH	2013.01	Veterans Supportive Housing	68	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/Impact/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. AH defines exempt households 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. These include public housing, Mixed (mixed-finance, mixed-income), and HomeFlex rental communities achieved through public-private partnerships. Management agents at those sites are responsible for implementing AH housing policies. AH conducts periodic site visits and consultations with management representatives, as well as requests and reviews management reports for compliance while offering training classes with respect to property operations, compliance, and financial oversight.

<b>CE #5: Increase in Agency Rental Revenue - \$125 Minimum Rent</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Total household contributions towards housing assistance (increase).	Household contributions prior to implementation of the activity (in dollars).	Expected household contributions after implementation of the activity (in dollars).	Actual household contributions after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
	Monthly minimum rent = \$25	Expected monthly minimum rent = \$125	Actual monthly minimum rent = \$125	<b>Exceeds Benchmark</b>
	Total households paying <i>Only</i> the minimum rent = 2,272	Expected households paying <i>Only</i> the minimum rent = 640	Actual households paying <i>Only</i> the minimum rent = 1,075	
	Total <b>Annual Agency Rental Revenue</b> prior to implementation of the activity is \$ 681,600	Expected <b>Annual Agency Rental Revenue</b> after implementation of the activity is \$ 960,000	Actual <b>Annual Agency Rental Revenue</b> after implementation of the activity is \$ 1,612,500	
% of Households Paying <i>Only</i> the Minimum Rent	N/A	3.9%	5.0%	

### iii. Actual Non-Significant Changes

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

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

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

### v. Actual Significant Changes

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

**vi. Challenges in Achieving Benchmarks and Possible Strategies**

Although AH achieved its benchmark, COVID-19 factors may affect future achievement of this benchmark because of business closures and subsequent job losses.

**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/Impact/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 and non-elderly disabled persons.

Incentivizing 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 included in the annual household income calculation for the Total Tenant Payment amount. This activity complements AH’s Aging Well strategy.

<b>SS #8: Households Transitioned to Self Sufficiency - Earned Income Disregard</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
	Households transitioned to self sufficiency (<<PHA definition of self-sufficiency>>) prior to implementation of the activity (number). This number may be zero.	Expected households transitioned to self sufficiency (<<PHA definition of self-sufficiency>>) after implementation of the activity (number).	Actual households transitioned to self sufficiency (<<PHA definition of self-sufficiency>>) after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
Number of households transitioned to Self-Sufficiency: Non-Elderly Disabled and Elderly Households Reporting Earned Income (increase).	Total Non-Elderly Disabled (NED) households = Unk	Expected NED households = 3,372	Actual NED households = 3,436	<b>Benchmark Not Achieved</b>
	% of NED households with earned income = N/A	Expected % of NED households with earned income = 13.5%	Actual % of NED households with earned income = 14.6%	
	Total Elderly households = Unk	Expected Elderly households = 6,857	Actual Elderly households = 7,793	
	% of Elderly households with earned income = N/A	Expected % of Elderly households with earned income = 10.1%	Actual % of Elderly households with earned income = 5.9%	
	<b>NED and Elderly Households with Earned Income</b> prior to implementation of the activity is  <b>26</b>	<b>Expected NED and Elderly Households with Earned Income</b> after implementation of the activity is  <b>1,147</b>	<b>Actual NED and Elderly Households with Earned Income</b> after implementation of the activity is  <b>959</b>	
% of NED and Elderly HHS w/Earned Incme	N/A	11.2%	8.7%	

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

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

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

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

### **v. Actual Significant Changes**

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

### **vi. Challenges in Achieving Benchmarks and Possible Strategies**

Although AH achieved its benchmark, COVID-19 factors may affect future achievement of this benchmark because of business closures and subsequent job losses.

## **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/Impact/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 full-time 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 household 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 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. Once AH realized 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.

<b>SS #8: Households Transitioned to Self Sufficiency - Work/Program Requirement</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of households transitioned to self sufficiency (increase). The PHA may create one or more definitions for "self sufficiency" to use for this metric. Each time the PHA uses this metric, the "Outcome" number should also be provided in Section (II) Operating Information in the space provided.	Households transitioned to self sufficiency (<<PHA definition of self-sufficiency>>) prior to implementation of the activity (number). This number may be zero.	Expected households transitioned to self sufficiency (<<PHA definition of self-sufficiency>>) after implementation of the activity (number).	Actual households transitioned to self sufficiency (<<PHA definition of self-sufficiency>>) after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
	Non-compliant households referred for assistance = 0 Non-compliant households returned to compliant status = 0	Expected non-compliant households referred for assistance = 871 Expected non-compliant households returned to compliant status = 233	Actual non-compliant households referred for assistance = 1,440 Actual non-compliant households returned to compliant status = 277	<b>Benchmark Not Achieved</b>
	<b>Percent of Non-Compliant Households Meeting Program Compliance</b> after receiving assistance prior to implementation of the activity is  <b>N/A</b>	<b>Expected Percent of on-Compliant Households Meeting Program Compliance</b> after receiving assistance after implementation of the activity is  <b>27%</b>	<b>Actual Percent of Non-Compliant Households Meeting Program Compliance</b> after receiving assistance after implementation of the activity is  <b>19%</b>	

**iii. Actual Non-Significant Changes**

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

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

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

**v. Actual Significant Changes**

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

**vi. Challenges in Achieving Benchmarks and Possible Strategies**

Although AH achieved its benchmark, COVID-19 factors may affect future achievement of this benchmark because of business closures and subsequent job losses.

**HC.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/Impact/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 in 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. 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, and quality control inspections. AH may also conduct special inspections related to health and safety issues as initiated by program participants, property owners/housing partners, or community neighbors.

The most recent enhancement captured under this activity includes revision to the Site and Vicinity standards from a 6-door radius (front-back-left-right) to a 1-door radius. This standard clearly defines unit eligibility for both property owners/housing partners and program participants, as well as increases the housing stock for AH's tight and very competitive affordable rental market.

<b>HC #1: Additional Units of Housing Made Available - Enhanced Inspection Standards</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of new housing units made available for households at or below 80% Area Median Income (AMI) as a result of the activity (increase).	Housing units of this type prior to implementation of the activity (number). This number may be zero.	Expected housing units of this type after implementation of the activity (number).	Actual housing units of this type after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
	Number of new HomeFlex (HFX) units = Unk	Expected new HFX units = 104	Actual new HFX units = 106	<b>Benchmark Not Achieved</b>
	Number of new Housing Choice Voucher (HCV) units = Unk	Expected new HCV units = 271	Actual new HCV units = 84	
	<b>Total New Subsidized Units for Households</b> ≤80% AMI prior to implementation of the activity is  <b>N/A</b>	<b>Expected New Subsidized Units for Households</b> ≤80% AMI after implementation of the activity is  <b>375</b>	<b>Actual New Subsidized Units for Households</b> ≤80% AMI after implementation of the activity is  <b>190</b>	
<i>New HFX Agreements</i>	<i>0</i>	<i>13</i>	<i>3</i>	
<i>New HCV Households (net)</i>	<i>0</i>	<i>310</i>	<i>289</i>	

**iii. Actual Non-Significant Changes**

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

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

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

**v. Actual Significant Changes**

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

**vi. Challenges in Achieving Benchmarks and Possible Strategies**

Beyond COVID-19 pandemic protocol challenges, AH worked diligently to dispel rumors and debunk myths about voucher holding families in its outreach efforts to attract new and retain existing property owners to its HCV Program. Ongoing solutions continue to include efforts, such as AH's Leasing Incentive Fees (LIFs) and Property Protection (P2) Program, to promote comfort and ease among current and future housing partners while on AH's HCV Program.

## 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/Impact/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.

<b>SS #5: Households Assisted by Services that Increase Self Sufficiency -</b>				
<b>Good Neighbor Program II</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of households receiving services aimed to increase self sufficiency (increase).	Households receiving self sufficiency services prior to implementation of the activity (number).	Expected number of households receiving self sufficiency services after implementation of the activity (number).	Actual number of households receiving self sufficiency services after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
Number of New Program Admissions Completing Good Neighbor Program (GNP) Services through Martin Luther King Sr. Community Resources Collaborative (MLKSCRC)	New program admissions referred for services = 0	Expected new program admissions referred for services = 1,387	Actual new program admissions referred for services = 1,007	<b>Benchmark Not Achieved</b>
	New program admissions completing services = 0	Expected new program admissions completing services = 1,387	Actual new program admissions completing services = 897	
	<b>Total Percent of New Households Completing Good Neighbor Program (GNP) Services</b> prior to implementation of the activity is  <b>0%</b>	<b>Expected Percent of New Households Completing GNP Services</b> after implementation of the activity is  <b>100%</b>	<b>Actual Percent of New Households Completing GNP Services</b> after implementation of the activity is  <b>89%</b>	

### iii. Actual Non-Significant Changes

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

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

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

**v. Actual Significant Changes**

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

**vi. Challenges in Achieving Benchmarks and Possible Strategies**

COVID-19 pandemic protocols directly influenced program admissions and terminations, as well as active program participation, especially from late March 2020 through June 30, 2020. Solutions included changing the platform approach from in-person to virtual to achieve benchmarks. Nevertheless, AH must begin to factor lingering effects of the pandemic to continue to reach program participants.

**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/Impact/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 (six months or longer) of unemployment.

<b>SS #5: Households Assisted by Services that Increase Self Sufficiency -</b>				
<b>Human Development Services</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of households receiving services aimed to increase self sufficiency (increase).	Households receiving self sufficiency services prior to implementation of the activity (number).	Expected number of households receiving self sufficiency services after implementation of the activity (number).	Actual number of households receiving self sufficiency services after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
Total Households Receiving Services through the Family Self-Sufficiency (FSS) Program	Total <b>Households Enrolled in AH's FSS Program</b> prior to implementation of the activity is  <b>0</b>	Expected <b>Households Enrolled in AH's FSS Program</b> after implementation of the activity is  <b>222</b>	Actual <b>Households Enrolled in AH's FSS Program</b> after implementation of the activity is  <b>243</b>	<b>Exceeds Benchmark</b>

**iii. Actual Non-Significant Changes**

This activity’s focus captures participant enrollment in AH’s Family Self-Sufficiency Program and comprising self-sufficiency activities offered through AH’s Human Development Services team.

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

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

**v. Actual Significant Changes**

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

**vi. Challenges in Achieving Benchmarks and Possible Strategies**

Although AH achieved its benchmark, the COVID-19 pandemic influenced participant participation from late March 2020 through the end of AH’s fiscal year, June 30, 2020. The pandemic may factor in AH achieving future benchmarks as AH takes precautions to protect existing program participants.

**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/Impact/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.

<b>HC #4: Displacement Prevention -</b>				
<b>4 to 1 Elderly Admissions</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of households at or below 80% AMI that would lose assistance or need to move (decrease). If units reach a specific type of household, give that type in this box.	Households losing assistance/moving prior to implementation of the activity (number).	Expected households losing assistance/moving after implementation of the activity (number).	Actual households losing assistance/moving after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
Placement of 4 Elderly Program Admissions before Placement of 1 Non-Elderly Disabled Program Admission at AH-Owned Communities	New elderly admissions to Public Housing (PH) Program = Unk New non-elderly disabled (NED) admissions to PH Program = Unk	Expected new elderly admissions to PH Program = 294 Expected new NED admissions to PH Program = 73	Actual new elderly admissions to PH Program = 120 Actual new NED admissions to PH Program = 218	<b>Benchmark Not Achieved</b>
	<b>Total New Elderly and Non-Elderly Disabled (NED) Public Housing Program Admission Ratio</b> prior to implementation of the activity is  <b>N/A</b>	<b>Expected New Elderly and NED Public Housing Program Admission Ratio</b> after implementation of the activity is  <b>4 to 1</b>	<b>Actual New Elderly and NED Public Housing Program Admission Ratio</b> after implementation of the activity is  <b>1 to 1</b>	

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

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

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

AH changed the activity's metric to HC #4: Displacement Prevention to capture accurately the intent of this activity, which is to prevent the displacement of seniors at senior designated communities because of potentially housing other population groups at a higher rate in these communities. Data collection and other elements of this activity remain the same.

### **v. Actual Significant Changes**

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

### **vi. Challenges in Achieving Benchmarks and Possible Strategies**

Although AH achieved its benchmark, COVID-19 factors directly influenced program admissions and terminations and may affect future achievement of this benchmark because of limited turnover units.

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

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

Activity approved and implemented in FY 2005.

### **ii. Description/Impact/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 lacking on-site supportive services, in order 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 are homeless assistance programs and supportive services, non-targeted, or mainstream programs. AH houses Home Again, its short-term housing assistance efforts under this activity. AH designed Home Again to help families avoid homelessness or combat chronic or extended periods of homelessness by essentially providing a short-term housing assistance.

<b>HC #1: Additional Units of Housing Made Available - Developing Alternate and Supportive Housing Resources</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of new housing units made available for households at or below 80% AMI as a result of the activity (increase). If units reach a specific type of household, give that type in this box.	Housing units of this type prior to implementation of the activity (number). This number may be zero.	Expected housing units of this type after implementation of the activity (number).	Actual housing units of this type after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
Short-Term Assistance Provided to Eligible Households Meeting Homeless or At-Risk of Homelessness Definitions.	<b>Total Households Receiving Assistance to Address or Prevent Homelessness</b> prior to implementation of the activity is  <b>0</b>	<b>Expected Households Receiving Assistance to Address or Prevent Homelessness</b> after implementation of the activity is  <b>225</b>	<b>Actual Households Receiving Assistance to Address or Prevent Homelessness</b> after implementation of the activity is  <b>295</b>	<b>Exceeds Benchmark</b>

**iii. Actual Non-Significant Changes**

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

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

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

**v. Actual Significant Changes**

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

**vi. Challenges in Achieving Benchmarks and Possible Strategies**

Although AH achieved its benchmark, the COVID-19 pandemic influenced new admission processes from late March 2020 through the end of AH’s fiscal year, June 30, 2020. The pandemic may factor in AH achieving future benchmarks as AH takes precautions to protect existing program participants.

**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/Impact/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 as a demonstration model (HUD-approved November 2, 2012) to reposition 301 units at Centennial Place in FY 2015. The demonstration model allowed 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.

<b>HC #2: Units of Housing Preserved - Reformulating Subsidy Arrangement</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of housing units preserved for households at or below 80% AMI that would otherwise not be available (increase). If units reach a specific type of household, give that type in this box.	Housing units preserved prior to implementation of the activity (number).	Expected housing units preserved after implementation of the activity (number).	Actual housing units preserved after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
	Number of preservation projects achieving a financial closing = 0	Expected number of preservation projects achieving a financial closing = 0	Actual number of preservation projects achieving a financial closing = 0	<b>Meets Benchmark</b>
	Total <b>Housing Units Preserved</b> prior to implementation of the activity is <b>0</b>	Expected <b>Housing Units Preserved</b> prior to implementation of the activity is <b>0</b>	Total <b>Housing Units Preserved</b> prior to implementation of the activity is <b>0</b>	

**iii. Actual Non-Significant Changes**

This activity did not have any non-significant changes during the reporting period; however, AH identified this activity as a potential duplicative effort because of AH's participation in the Rental Assistance Demonstration (RAD) Program. Nonetheless, AH will thoroughly assess the benefits of continuing this activity in the future or closing the activity out during FY 2022.

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

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

**v. Actual Significant Changes**

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

**vi. Challenges in Achieving Benchmarks and Possible Strategies**

COVID-19 protocols influenced benchmark achievements for this activity. AH identified this activity as a potential duplicative effort and plans to assess the benefits of this activity in FY 2022.

**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/Impact/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, AH continued to generate innovative revitalization ideas and plans 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 building affordable housing units and offering retail and commercial ventures in areas with great recreational facilities, high performing schools and close to transportation to incorporate into AH's Revitalization Program, which may include AH-ownership of retail and commercial facilities to initiate revitalization.

<b>HC #1: Additional Units of Housing Made Available - Revitalization Program</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
	Housing units of this type prior to implementation of the activity (number). This number may be zero.	Expected housing units of this type after implementation of the activity (number).	Actual housing units of this type after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
Number of new housing units made available for households at or below 80% AMI as a result of the activity (increase). If units reach a specific type of household, give that type in this box.	Number of revitalization projects achieving a financial closing = Unk	Expected number of revitalization projects achieving a financial closing = 13	Actual number of revitalization projects achieving a financial closing = 0	<b>Benchmark Not Achieved</b>
	<b>Total New Housing Units</b> for households at or below 80% area median income (AMI) prior to implementation of the activity is  <b>2,720</b>	<b>Expected New Housing Units</b> for households at or below 80% AMI after implementation of the activity is  <b>1,279</b>	<b>Actual New Housing Units</b> for households at or below 80% AMI after implementation of the activity is  <b>0</b>	
<i>Total Units</i>	<i>Unk</i>	<i>1,850</i>	<i>0</i>	
<i>% Affordable Units</i>	<i>N/A</i>	<i>69%</i>	<i>N/A</i>	
<i>Commercial/Retail Total</i>	<i>0</i>	<i>0</i>	<i>0</i>	

**iii. Actual Non-Significant Changes**

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

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

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

**v. Actual Significant Changes**

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

**vi. Challenges in Achieving Benchmarks and Possible Strategies**

In addition to COVID-19 pandemic protocols, various steps in the construction process prevented AH from achieving its benchmark. Possible strategies for the future include monitoring project timelines closely, engaging in commercial business ventures on AH-Owned parcels in amenity-poor communities, and working closely with HUD.

## 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/Impact/Update

AH introduced this activity to facilitate financial closings in development projects associated with repositioning its public housing properties, which AH presumed to include finding 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 would miss location and other opportunities, or faced with delays and extended timelines, which contribute to increased costs. These actions are contradictory to spending federal dollars effectively and efficiently and do 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 of the various financing components beyond facilitating financial closings. However, AH intended to issue construction loans, not to exceed 5 years duration, to development partners as both a revenue stream to AH and to expedite the development of new affordable housing opportunities. As AH continues to acquire and revitalize communities in accordance with its vision, mission, and current business model, such activities require access to short-term funding for the innovative revitalization ideas and plans to transform amenity-poor communities into amenity-rich communities and first choice areas, where families can live, work, and play.

<b>HC #1: Additional Units of Housing Made Available -</b>				
<b>Gap Financing</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
	Housing units of this type prior to implementation of the activity (number). This number may be zero.	Expected housing units of this type after implementation of the activity (number).	Actual housing units of this type after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
Number of new housing units made available for households at or below 80% AMI as a result of the activity (increase). If units reach a specific type of household, give that type in this box.	Co-Investment Projects achieving a financial closing = Unk	Expected Co-Investment Projects achieving a financial closing = 5	Actual Co-Investment Projects achieving a financial closing = 0	<b>Benchmark Not Achieved</b>
	<b>Total New Housing Units</b> for households at or below 80% area median income (AMI) prior to implementation of the activity is	<b>Expected New Housing Units</b> for households at or below 80% AMI after implementation of the activity is	<b>Actual New Housing Units</b> for households at or below 80% AMI after implementation of the activity is	
	<b>2,720</b>	<b>511</b>	<b>0</b>	
<i>Total Units</i>	<i>Unk</i>	<i>532</i>	<i>0</i>	
<i>% Affordable Units</i>	<i>N/A</i>	<i>96%</i>	<i>N/A</i>	

**iii. Actual Non-Significant Changes**

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

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

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

**v. Actual Significant Changes**

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

**vi. Challenges in Achieving Benchmarks and Possible Strategies**

Various steps in the financing process prevented AH from achieving its benchmark. Possible strategies include working closely with HUD and increasing project timelines.

**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/Impact/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.

<b>HC #5: Increase in Resident Mobility -</b>				
<b>AH Submarket Payment Standards</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of households able to move to a better unit and/or neighborhood of opportunity as a result of the activity (increase).	Households able to move to a better unit and/or neighborhood of opportunity prior to implementation of the activity (number). This number may be zero.	Expected households able to move to a better unit and/or neighborhood of opportunity after implementation of the activity (number).	Actual increase in households able to move to a better unit and/or neighborhood of opportunity after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
	Number of Housing Choice Voucher (HCV) Program families = Unk Number of HCV Program families choosing an area of opportunity (by zip code) = Unk	Expected number of HCV Program families = 9,132 Number of HCV Program families choosing an area of opportunity (by zip code) = 1,899	Actual number of HCV Program families = 9,597 Number of HCV Program families choosing an area of opportunity (by zip code) = 1,988	<b>Benchmark Not Achieved</b>
	<b>Percent of HCV Households Choosing an Area of Opportunity</b> prior to implementation of the activity is  <b>Unk</b>	<b>Expected Percent of HCV Households Choosing an Area of Opportunity</b> after implementation of the activity is  <b>20.8%</b>	<b>Actual Percent of HCV Households Choosing an Area of Opportunity</b> after implementation of the activity is  <b>20.7%</b>	

**iii. Actual Non-Significant Changes**

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

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

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

**v. Actual Significant Changes**

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

**vi. Challenges in Achieving Benchmarks and Possible Strategies**

AH did not experience any challenges in achieving this benchmark.

**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/Impact/Update**

Originally, AH introduced this activity to eliminate duplicated administrative processes, eligibility determinations, and resident screening at AH’s HomeFlex (AH’s MTW Project-Based Rental Assistance Program) 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 housing choices for the targeted population.

<b>CE #6: Reducing Per Unit Subsidy Cost for Participating Households</b>				
<b>HomeFlex Site-Based On-Site Administration</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Average amount of <b>Section 8</b> and/or <b>9 subsidy</b> (or local, non-traditional subsidy) per household affected by this policy in dollars (decrease).	Average subsidy per household affected by this policy prior to implementation of the activity (in dollars).	Expected average subsidy per household affected by this policy after implementation of the activity (in dollars).	Actual average subsidy per household affected by this policy after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
	Average monthly Housing Choice Voucher (HCV) subsidy payment = Unk Average monthly HomeFlex (HFX) subsidy payment = Unk	Average monthly HCV subsidy payment = \$639 Average monthly HFX subsidy payment = \$583	Average monthly HCV subsidy payment = \$752 Average monthly HFX subsidy payment = \$595	<b>Exceeds Benchmark</b>
	<b>Section 8 Subsidy Savings with HomeFlex Compared to Conventional Housing Choice</b> prior to implementation of the activity is  <b>\$0/household</b>	<b>Expected Section 8 Subsidy Savings with HomeFlex Compared to Conventional Housing Choice</b> after implementation of the activity is  <b>\$56/household</b>	<b>Actual Section 8 Subsidy Savings with HomeFlex Compared to Conventional Housing Choice</b> after implementation of the activity is  <b>\$157/household</b>	

**iii. Actual Non-Significant Changes**

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

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

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

**v. Actual Significant Changes**

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

**vi. Challenges in Achieving Benchmarks and Possible Strategies**

Although AH achieved its benchmark, the COVID-19 pandemic influenced new admission processes from late March 2020 through the end of AH’s fiscal year, June 30, 2020. The pandemic may factor in AH achieving future benchmarks as AH takes precautions to protect existing program participants.

## 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/Impact/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 innovations implemented under this activity include measures designed to enhance and streamline core-business processes and related policies, procedures, and business documents.

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

<b>CE #1: Agency Cost Savings - Reengineering the Housing Choice Voucher Program</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Average amount of <b>Section 8</b> and/or <b>9</b> <b>subsidy</b> (or local, non-traditional subsidy) per household affected by this policy in dollars (decrease).	Average subsidy per household affected by this policy prior to implementation of the activity (in dollars).	Expected average subsidy per household affected by this policy after implementation of the activity (in dollars).	Actual average subsidy per household affected by this policy after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
	Number of Atlanta Tenant-Based Voucher (TBV) families = 9,167 HCV overhead total = \$12,000,000	Expected number of HCV families = 9,032 Expected HCV overhead total = \$7,485,145	Actual number of HCV families = 9,597 Actual HCV overhead total = \$9,535,291	<b>Benchmark Not Achieved</b>
	<b>Average Monthly Subsidy per Atlanta TBV Household</b> affected by this policy prior to implementation of the activity is  <b>\$1,309</b>	Expected <b>Average Monthly Subsidy per Atlanta TBV Household</b> affected by this policy after implementation of the activity is  <b>\$829</b>	Actual <b>Average Monthly Subsidy per Atlanta TBV Household</b> affected by this policy after implementation of the activity is  <b>\$994</b>	

**iii. Actual Non-Significant Changes**

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

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

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

**v. Actual Significant Changes**

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

**vi. Challenges in Achieving Benchmarks and Possible Strategies**

The COVID-19 pandemic required action to protect the safety of existing and prospective program participants and may have increased operational costs. AH continues to review possible strategies to lower per unit costs in the delivery of the Housing Choice Voucher Program.

**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/Impact/Update**

Previously, AH employed a third-party independent market study 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 our 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 analyses because of insight regarding rents in the Atlanta market and real estate expertise, as well as AH's overall workload.

**iii. Actual Non-Significant Changes**

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

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

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

**v. Actual Significant Changes**

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

**vi. Challenges in Achieving Benchmarks and Possible Strategies**

The COVID-19 pandemic required actions to protect the safety of existing and prospective program participants, and these actions may have increased operational costs. AH continues to review possible strategies to lower per unit cost in the delivery of the Housing Choice Voucher Program.

## 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/Impact/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 to become successful and sustainable homeowners. This program 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.

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

**HC #6: Increase in Homeownership Opportunities -**

**Comprehensive Homeownership Program**

<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of households that purchased a home as a result of the activity (increase).	Number of households that purchased a home prior to implementation of the activity (number). This number may be zero.	Expected number of households that purchased a home after implementation of the activity (number).	Actual number of households that purchased a home after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
	Number of <b>Households Assisted with Down Payment Assistance (DPA) Award</b> that purchased a home prior to implementation of the activity is  <b>0</b>	Expected number of <b>Households Assisted with Down Payment Assistance (DPA) Award</b> that purchased a home after implementation of the activity is  <b>185</b>	Total number of <b>Households Assisted with Down Payment Assistance (DPA) Award</b> that purchased a home after implementation of the activity is  <b>261</b>	<b>Exceeds Benchmark</b>

**iii. Actual Non-Significant Changes**

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

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

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

**v. Actual Significant Changes**

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

**vi. Challenges in Achieving Benchmarks and Possible Strategies**

Although AH achieved its benchmark, the COVID-19 pandemic may have affected home buying attitudes, and the pandemic may factor in future benchmark achievements.

**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/Impact/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 five 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. It 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.

<b>HC #1: Additional Units of Housing Made Available - HomeFlex as a Strategic Tool</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of new housing units made available for households at or below 80% AMI as a result of the activity (increase). If units reach a specific type of household, give that type in this box.	Housing units of this type prior to implementation of the activity (number). This number may be zero.	Expected housing units of this type after implementation of the activity (number).	Actual housing units of this type after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
	Number of new HomeFlex (HFX) communities = Unk	Expected number of new HFX communities = 29	Actual number of new HFX communities = 3	<b>Benchmark Not Achieved</b>
	New Standard HomeFlex units = 0	Expected new Standard HomeFlex units = 270	Actual new Standard HomeFlex units = 24	
	New HomeFlex Older Persons units = 0	Expected new HomeFlex Older Persons units = 97	Actual new HomeFlex Older Persons units = 97	
	New HomeFlex Supportive Housing units = 0	Expected new HomeFlex Supportive Housing units = 71	Actual new HomeFlex Supportive Housing units = 9	
	Number of <b>Additional Units of Housing Created</b> prior to implementation of the activity is	Expected number of <b>Additional Units of Housing Created</b> after implementation of the activity is	Actual number of <b>Additional Units of Housing Created</b> after implementation of the activity is	
<b>0</b>	<b>438</b>	<b>130</b>		

<b>HC #2: Units of Housing Preserved - HomeFlex as a Strategic Tool</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of housing units preserved for households at or below 80% AMI that would otherwise not be available (increase). If units reach a specific type of household, give that type in this box.	Housing units preserved prior to implementation of the activity (number).	Expected housing units preserved after implementation of the activity (number).	Actual housing units preserved after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
	Number of renewed HomeFlex (HFX) agreements = Unk	Expected number of renewed HFX communities = 2	Actual number of renewed HFX communities = 12	<b>Exceeds Benchmark</b>
	Renewed Standard HomeFlex units = 0	Expected renewed Standard HomeFlex units = 150	Actual renewed Standard HomeFlex units = 184	
	Renewed HomeFlex Older Persons units = 0	Expected renewed HomeFlex Older Persons units = 0	Actual renewed HomeFlex Older Persons units = 211	
	Renewed HomeFlex Supportive Housing units = 0	Expected renewed HomeFlex Supportive Housing units = 36	Actual renewed HomeFlex Supportive Housing units = 149	
Number of <b>Preserved Units of Housing Created</b> prior to implementation of the activity is <b>0</b>	Expected number of <b>Preserved Units of Housing Created</b> after implementation of the activity is <b>186</b>	After number of <b>Preserved Units of Housing Created</b> after implementation of the activity is <b>544</b>		

**iii. Actual Non-Significant Changes**

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

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

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

**v. Actual Significant Changes**

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

**vi. Challenges in Achieving Benchmarks and Possible Strategies**

The COVID-19 pandemic required action to protect the safety of existing and prospective program participants and reduced focus on adding or preserving units. Nonetheless, AH continues to review possible strategies to create and preserve housing units for its target populations.

**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/Impact/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 for 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
<b>Dependents</b>	\$480	\$750
<b>Elderly and/or Disabled</b>	\$400	\$1,000

AH submits that its standard deduction amounts provide an equitable approach for all assisted families and reduce the “interrogation-like” verification of unreimbursed out-of-pocket expenses. These standard deduction amounts add value to the calculation integrity while improving productivity because the standard deductions eliminate the burden of “chasing” receipts and potentially performing multiple calculations once eligible households produce evidence of out-of-pocket expenses. Finally, the standard deductions improve the accuracy of the rental calculation process.

<b>CE #2: Staff Time Savings - Rent Simplification / AH Standard Deductions</b>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	Total amount of staff time dedicated to the task prior to implementation of the activity (in hours).	Expected amount of total staff time dedicated to the task after implementation of the activity (in hours).	Actual amount of total staff time dedicated to the task after implementation of the activity (in hours).	Whether the outcome meets or exceeds the benchmark.
	Number of Housing Choice Tenant-Based Voucher (TBV) families = 17,338	Expected number of Housing Choice TBV families = 9,173	Actual number of Housing Choice TBV families = 9,597	<b>Benchmark Not Achieved</b>
	Time to process new and annual TBV files = 1.5 hours	Expected time to process new and annual TBV files = 1.0 hours	actual time to process new and annual TBV files = 1.5 hours	
	<b>Total Staff Time Dedicated</b> to the task prior to implementation of the activity is  <b>26,007.0 hours</b>	<b>Expected total Staff Time Dedicated</b> to the task after implementation of the activity is  <b>9,173.0 hours</b>	<b>Actual total Staff Time Dedicated</b> to the task after implementation of the activity is  <b>14,395.5 hours</b>	

**iii. Actual Non-Significant Changes**

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

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

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

**v. Actual Significant Changes**

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

**vi. Challenges in Achieving Benchmarks and Possible Strategies**

Although AH achieved its benchmark, the COVID-19 pandemic placed a moratorium on resident activity, especially intake processes as AH focused on the safety and well-being of existing program participants.

## 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/Impact/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.

<b>HC #5: Increase in Resident Mobility -</b>				
<b>Leasing Incentive Fee (LIF)</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
	Households able to move to a better unit and/or neighborhood of opportunity prior to implementation of the activity (number). This number may be zero.	Expected households able to move to a better unit and/or neighborhood of opportunity after implementation of the activity (number).	Actual increase in households able to move to a better unit and/or neighborhood of opportunity after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
Number of households able to move to a better unit and/or neighborhood of opportunity as a result of the activity (increase).	Number new Housing Choice Tenant-Based Voucher (TBV) Program admissions = Unk	Expected number new Housing Choice TBV Program admissions = 310	Actual number new Housing Choice TBV Program admissions = 289	<b>Meets Benchmark</b>
	Number of existing Housing Choice TBV Program moves = Unk	Expected number of existing Housing Choice TBV Program moves = 459	Actual number of existing Housing Choice TBV Program moves = 480	
	Total <b>Number of Housing Choice TBV Families</b> able to move to a better unit and/or neighborhood of opportunity prior to implementation of the activity is	Expected <b>Number of Housing Choice TBV Families</b> able to move to a better unit and/or neighborhood of opportunity after implementation of the activity is	Expected <b>Number of Housing Choice TBV Families</b> able to move to a better unit and/or neighborhood of opportunity after implementation of the activity is	
	<b>N/A</b>	<b>769</b>	<b>769</b>	

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

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

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

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

### **v. Actual Significant Changes**

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

### **vi. Challenges in Achieving Benchmarks and Possible Strategies**

Although AH achieved its benchmark, the COVID-19 pandemic influenced recruitment of new housing partners as AH took precautions to protect existing program participants.

## **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/Impact/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.

<b>CE #4: Increase in Resources Leveraged</b>				
<b>Energy Performance Contracting</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Amount of funds leveraged in dollars (increase).	Amount leveraged prior to implementation of the activity (in dollars). This number may be zero.	Expected amount leveraged after implementation of the activity (in dollars).	Actual amount leveraged after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
	Projected annual benefits = \$333,986 Reported benefits = \$0	Expected projected annual benefits = \$645,359 Expected reported benefits = \$727,300	Actual projected annual benefits = \$492,094 Actual reported benefits = \$576,773	<b>Exceeds Benchmark</b>
	<b>Project Funds Leveraged</b> prior to implementation of the activity is  <b>\$0</b>	Expected <b>Project Funds Leveraged</b> after implementation of the activity is  <b>\$81,941</b>	Actual <b>Project Funds Leveraged</b> after implementation of the activity is  <b>\$84,679</b>	

**iii. Actual Non-Significant Changes**

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

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

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

**v. Actual Significant Changes**

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

**vi. Challenges in Achieving Benchmarks and Possible Strategies**

Although AH achieved its benchmark, the COVID-19 pandemic may factor in AH achieving future benchmarks as AH took precautions to protect existing program participants.

**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/Impact/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 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.

<b>CE #5: Agency Cost Savings - HCV Program HAP Abatement Policy</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Total cost of task in dollars (decrease).	Cost of task prior to implementation of the activity (in dollars).	Expected cost of task after implementation of the activity (in dollars).	Actual cost of task after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
Total Cost Savings to the Agency	Total cost of abated Housing Choice Voucher (HCV) units = Unk	Expected cost of abated HCV units = \$2,239	Actual cost of abated HCV units = \$2,943	<b>Exceeds Benchmark</b>
	Total number of abated HCV units = Unk	Total number of abated HCV units = 280	Total number of abated HCV units = 241	
	Total <b>Cost Savings of Abated HCV Units</b> prior to implementation of the activity is \$ -	Expected <b>Cost Savings of Abated HCV Units</b> after implementation of the activity is \$ 627,008	Actual <b>Cost Savings of Abated HCV Units</b> after implementation of the activity is \$ 709,414	

**iii. Actual Non-Significant Changes**

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

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

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

**v. Actual Significant Changes**

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

**vi. Challenges in Achieving Benchmarks and Possible Strategies**

Although AH achieved its benchmark, the COVID-19 pandemic may factor in AH achieving future benchmarks as AH took precautions to protect existing program participants.

**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/Impact/Update**

AH desires to enhance the delivery of case management and supportive services to older persons and persons with disabilities. 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.

<b>SS #5: Households Assisted by Services that Increase Self Sufficiency - Aging Well Program</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of households receiving services aimed to increase self sufficiency (increase).	Households receiving self sufficiency services prior to implementation of the activity (number).	Expected number of households receiving self sufficiency services after implementation of the activity (number).	Actual number of households receiving self sufficiency services after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
	Households receiving Atlanta Regional Commission (ARC) services = Unk	Expected households receiving ARC services = 230	Actual households receiving ARC services = 888	<b>Exceeds Benchmark</b>
	Households receiving Quality Living Services (QLS) = Unk	Expected households receiving QLS = 467	Actual households receiving QLS = 0	
	Households receiving Resident Service via PMD Contract = Unk	Expected households receiving resident services via PMD Contract = 473	Actual households receiving resident services via PMD Contract = 1,261	
	Households receiving Assorted Services via GEAHD Events = Unk	Expected households receiving Assorted Services via GEAHD Events = 273	Actual households receiving Assorted Services via GEAHD Events = 1,865	
Total number of <b>Elderly, Disabled Households Receiving Self-Sufficiency Services</b> prior to implementation of the activity is	Expected number (avg.) of <b>Elderly, Disabled Households Receiving Self-Sufficiency Services</b> after implementation of the activity is	Actual number (avg.) of <b>Elderly, Disabled Households Receiving Self-Sufficiency Services</b> after implementation of the activity is		
	<b>0</b>	<b>361</b>	<b>1,004</b>	

**iii. Actual Non-Significant Changes**

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

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

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

**v. Actual Significant Changes**

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

**vi. Challenges in Achieving Benchmarks and Possible Strategies**

The COVID-19 pandemic influenced AH’s intake process, which may have contributed to AH not achieving its new household participation benchmark as AH took precautions to protect existing program participants.

**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/Impact/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.

<b>HC #7: Households Assisted by Services that Increase Housing Choice - Veterans Supportive Housing</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of households receiving services aimed to increase housing choice (increase).	Households receiving this type of service prior to implementation of the activity (number). This number may be zero.	Expected number of households receiving these services after implementation of the activity (number).	Actual number of households receiving these services after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
	<b>Total Households Receiving AH and VA Housing Services</b> prior to implementation of the activity.  <b>0</b>	Expected total <b>Households Receiving AH and VA Housing Services</b> after implementation of the activity.  <b>243</b>	Actual total <b>Households Receiving AH and VA Housing Services</b> after implementation of the activity.  <b>241</b>	<b>Benchmark Not Achieved</b>

**iii. Actual Non-Significant Changes**

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

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

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

**v. Actual Significant Changes**

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

**vi. Challenges in Achieving Benchmarks and Possible Strategies**

AH administers 270 VASH vouchers and issuance is limited by eligible referrals from the local VA Office. AH desires to project-base assistance of VASH vouchers at future developments, so AH must find strategies that permit AH to administer this program 100%.

## 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. Actions Taken Towards Implementation**  
N/A

## C. Activities on Hold

**i. Brief Description of the Approved MTW Activity that was Approved, Implemented, and MTW PHA Stopped Implementing (but has plans to reactivate in the future)**  
N/A

**ii. Actions Taken Towards Reactivating the MTW Activity in the Plan Year**  
N/A

## D. Closed Out Activities

**i. List Closed out MTW Activities. Specify Plan Year: Approval, Implementation, Closeout**  
AH lists closed out activities in tables that follow.

**ii. Explanation of MTW Activity Closeout**  
AH lists closed out activities in tables that follow.

**iii. MTW Activity Closeout**

- Final outcome and lessons learned
- Statutory exceptions that might have provided additional benefit
- Summary table listing outcomes

Please see tables on the following pages.

MTW Activity		Fiscal Year			Close Out Reason
Number	Name	Approved	Implemented	Closeout	
	American Recovery and Reinvestment Act (ARRA) of 2009	N/A	2009 <sup>12</sup>	2012	AH did not need an MTW waiver to conduct this activity
	Voluntary Compliance Agreement (VCA)	N/A	2009 <sup>13</sup>	2011	AH did not need an MTW waiver to conduct this activity
PH. 2003.01	Affordable Fixed Rent / Affordable Flat Rent	2003	N/A	2017	AH combined this activity with PH.2017.01 – Elimination of Flat Rent
SH. 2005.08	Independent Living Demonstration	2005	2005	2020	AH has not been able to move forward with this activity because of various local and state requirements. In addition, it is unclear if an MTW waiver(s) is required
HD. 2005.14	Individual Development Accounts (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

<sup>12</sup> AH's estimated implementation year of Federal grant award.

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

MTW Activity		Fiscal Year			Close Out Reason
Number	Name	Approved	Implemented	Closeout	
AW. 2011.01	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
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 although an MOU was in place with the GA Department of Health and Human Services (DHHS). AH did not receive any referrals from DHHS or other state agencies and reallocated the vouchers designated for this program to existing or new programs dedicated to homelessness or its prevention.

# V. SOURCES AND USES OF MTW FUNDS

## A. Actual Sources and Uses of MTW Funds

### i. Actual Sources of MTW Funds in the Plan Year

The MTW PHA shall submit unaudited and audited information in the prescribed Financial Data Schedule (FDS) format through the Financial Assessment System – PHA (FASPHA), or its successor system.

### ii. Actual Uses of MTW Funds in the Plan Year

The MTW PHA shall submit unaudited and audited information in the prescribed FDS format through the FASPHA, or its successor system.

### iii. Describe Actual Use of MTW Single Fund Flexibility

The MTW PHA shall provide a thorough narrative of actual 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 (IV) of the Annual MTW Report. The MTW PHA shall also provide a thorough description of how it used 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).

#### ACTUAL 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. Although the MTW Agreement permits AH to include RHF Funds in the MTW Funds, AH has elected not 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 be the 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. These future projects could potentially address the shortfall of affordable 1 and 2 bedroom units in AH's service jurisdiction. In addition, AH plans to direct funds towards Scholars Landing's affordable housing projects, which would provide eligible individuals and families with a Choice Neighborhood Down Payment Assistance Award to purchase a home within Scholars Landing, a HUD-approved revitalization area.

## B. Local Asset Management Plan (LAMP)

i. Did the MTW PHA allocate costs within statute in the Plan Year?

Yes

ii. Did the MTW PHA implement a local asset management plan (LAMP) in the Plan Year?

Yes

iii. Did the MTW PHA provide a LAMP in the appendix?

Yes, see page 109 of Appendix D

iv. If the MTW PHA has provided a LAMP in the appendix, please provide a brief update on implementation of the LAMP. Please provide any actual changes (which must be detailed in an approved Annual MTW Plan/Plan amendment) or state that the MTW PHA did not make any changes in the Plan Year.

AH did not make any changes to the LAMP during FY 2021.

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## VI. ADMINISTRATIVE

### A. Reviews, Audits, and Inspections

AH was not required to take action in response to any HUD reviews, audits, and/or physical inspection issues during the reporting period.

### B. Evaluation Results

AH is not required to conduct evaluations on its MTW Demonstration nor on any of its MTW Activities pursuant to its Amended and Restated MTW Agreement. However, AH may engage in conducting internal evaluations that may involve third-party evaluators or hybrid evaluation options in accordance with stated Board direction.

### C. MTW Statutory Requirement Certification

AH certifies that it has met the three MTW Statutory Requirements:

1. Ensured that at least 75% of households assisted by the MTW PHA are very low-income.
2. Continued to assist substantially the same total number of households that it would have assisted had AH not participated in the MTW demonstration.
3. Maintained a comparable mix of households (by family size) served that it would have served had AH not participated in the MTW demonstration.

Please **see page 79 of Appendix A** to review certification.

### D. MTW Energy Performance Contract (EPC) Flexibility Data

AH provides information by April 30 annually in accordance with its MTW Agreement. AH provides the following information:

- Documentation to support that AH utilizes at least 75% of the energy savings as payment for project costs.
- Documentation that identifies energy conservation measures installed and projected consumption reductions for all energy conservation measures.
- Copy of the Energy Service Companies (ESCO) prepared Measurement and Verification (M&V) Report.

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***End Form 50900***

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# APPENDIX A: MTW Statutory Requirements

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## Certification

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## Appendix A: MTW Statutory Requirements

**THE HOUSING AUTHORITY OF THE CITY OF ATLANTA, GEORGIA'S  
MTW STATUTORY REQUIREMENTS CERTIFICATION  
TO THE US DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT (HUD)**

On behalf of The Housing Authority of the City of Atlanta, Georgia ("AH") and in accordance with AH's Amended and Restated Moving to Work 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, I hereby certify the following:

1. At least 75 percent of the households assisted by AH are very low-income families as defined in Section 3(b)(2) of the US Housing Act of 1937, as amended;
2. As set forth in AH's HUD Funding Availability Protocol, dated November 9, 2007, AH assisted substantially the same total number of eligible low-income families as would have been served had the HUD funds which comprise the MTW Funds [as defined in the MTW Agreement] not been combined into a single fund;
3. As set forth in AH's HUD Funding Availability Protocol, dated November 9, 2007, AH maintained a comparable mix of families as would have been served or assisted had the MTW Funds made available to AH not been under the MTW Demonstration; and
4. AH's FY 2021 Moving to Work Annual Report meets the substantive information reporting requirements of the Paperwork Reduction Act for the MTW Demonstration Program and HUD Form 50900 (OMB Approval Number 2577-0216, Expiration Date 03/31/2024).

All capitalized terms used but not defined herein shall have their respective meaning as set forth in the MTW Agreement

**THE HOUSING AUTHORITY OF THE CITY OF  
ATLANTA, GEORGIA**

By:   
Name: Eugene E. Jones, Jr.  
Title: President and Chief Executive Officer  
Date: September 27, 2021

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## **APPENDIX B: HUD Form 50900 Attachments**

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### Board Resolution

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SECRETARY'S CERTIFICATE

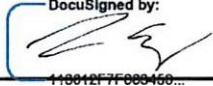
I, **EUGENE E. JONES, JR.**, DO HEREBY CERTIFY that:

1. I am the presently appointed and qualified Secretary of the Board of Commissioners of The Housing Authority of the City of Atlanta, Georgia ("AH"). In such capacity, I am custodian of its records and I am familiar with its organization, membership and activities.
2. Attached hereto as Exhibit OPS-1 is a true and correct copy of the resolution authorizing AH to submit its Fiscal Year 2021 Moving-to-Work (MTW) Annual Report to the United States Department of Housing and Urban Development in accordance with AH's Amended and Restated MTW Agreement.
3. This resolution was presented to the AH Board of Commissioners (the "Board") at its Regular Meeting on September 22, 2021 (the "Meeting").
4. The following Board members were present for the Meeting:  
Dr. Christopher Edwards, Chair  
Robert Highsmith  
Patrick Dixon  
Tene Traylor  
Rosalind Elliott  
Shelia Harris
5. At the Meeting, the Board adopted and approved the resolution attached hereto as Exhibit OPS-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 27<sup>th</sup> day of September, 2021.

SEAL



DocuSigned by:  
  
118012F7F000460...  
**EUGENE E. JONES, JR.,**  
Secretary

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**RESOLUTION OPS-1**  
**THE HOUSING AUTHORITY OF THE CITY OF ATLANTA, GEORGIA SEEKS**  
**AUTHORIZATION TO SUBMIT FISCAL YEAR 2021 MOVING TO WORK ANNUAL**  
**REPORT TO THE U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT**

**RESOLUTION**

**WHEREAS**, under the Amended and Restated Moving To Work (MTW) Agreement, effective as of November 13, 2008, as further amended by that certain Second Amendment to the Moving To Work Agreement, effective as of January 16, 2009 (Amended and Restated MTW Agreement) between The Housing Authority of the City of Atlanta, Georgia (AH) and the United States Department of Housing and Urban Development (HUD), AH is required to submit an MTW Annual Report to HUD which, except for certain reports identified in the Amended and Restated MTW Agreement, replaces all other conventional HUD performance measures, including the Public Housing Assessment System and Section 8 Management Assessment Program.

**WHEREAS**, AH must submit its Fiscal Year (FY) 2021 MTW Annual Report to HUD by September 30, 2021;

**WHEREAS**, AH's Amended and Restated MTW Agreement identifies performance benchmarks and specific types of information that are required to be included in the MTW Annual Report. The performance benchmarks are designed to evaluate AH's performance during the term of the Amended and Restated MTW Agreement;

**WHEREAS**, AH's performance against these benchmarks is summarized in Exhibit OPS-1-A,

**WHEREAS**, AH's Amended and Restated MTW Agreement also requires AH to conduct an annual reevaluation of the impact of its rent policy changes. AH's FY 2021 rent impact analyses are attached hereto as Exhibits OPS-1-B through OPS-1-D; and

**WHEREAS**, AH requests authorization from the Board of Commissioners to submit its FY 2021 MTW Annual Report to HUD in accordance with AH's Amended and Restated MTW Agreement;

**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) 2021 Moving To Work (MTW) Annual Report is hereby approved.
2. Further, the President and Chief Executive Officer is authorized to submit AH's FY 2021 MTW Annual Report and such other required documents, certifications or forms to the United States Department of Housing and Urban Development (HUD) with such changes, additions or corrections as shall be deemed necessary or appropriate or as may be required by HUD. Further, the Chair or Vice Chair of the Board of Commissioners and the President and Chief Executive Officer are hereby authorized to execute any required documents, certifications or HUD forms related to the approval and filing of AH's FY 2021 MTW Annual Report.


ADOPTED, by the Board of Commissioners of The Housing Authority of the City of Atlanta, Georgia and signed in authentication of its passage, 22<sup>nd</sup> day of September 2021.

ATTEST:

APPROVAL:



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



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

APPROVAL FOR FORM AND LEGAL SUFFICIENCY:



\_\_\_\_\_  
**Dwayne C. Vaughn**  
**General Counsel**

## FY 2021 MTW ANNUAL REPORT BENCHMARKS SUMMARY

### OVERVIEW – 2021 MTW REPORT

Despite challenges posed by the COVID-19 pandemic, AH accomplished or achieved the following:

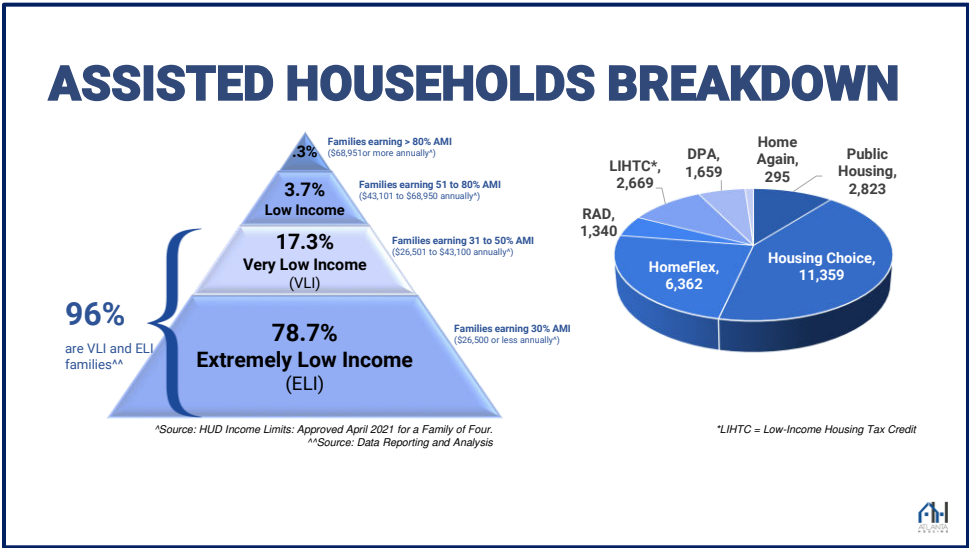
- Increased its **household served count to 26,507** in FY 2021 (a 3% increase)
- **Added 733 new households (net)** during FY 2021:
  - 130 new affordable units created through execution of 3 new HomeFlex Agreements;
  - 342 new Housing Choice families (net) leased up; and
  - 261 Down Payment Assistance awards provided to eligible, qualified, first-time homebuyers
- Completed adaptive reuse study of Roosevelt Hall
- Rehabilitated 596 units at 3 communities to meet RAD conversion requirements



### OVERVIEW – 2021 MTW REPORT

- Renewed 12 HomeFlex Agreements to maintain 544 units as affordable
- Assisted 295 individuals and families battling or at-risk of homelessness
- Coordinated AH Cares activities; 71 AH staff volunteers for more than 700 donated hours
- Accepted 202 Emergency Housing Vouchers (EHVs)
- Established ACCESS, a technology-based training program:
  - Initial cohort had 7 graduates
  - Facilitated 6 job placements (one graduate elected to remain with their current employer)
- Received \$450,000 Choice Neighborhoods Planning Grant for Bowen Homes
- Began Lease Up of London Townhomes (15% leased)





### MTW PROGRAM BENCHMARKS

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

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

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

Measurable Outcome	Baseline	Benchmark	2021 Actual	Benchmark Outcome
<b>Public Housing Program</b>				
• % Rents Uncollected	2.0%	2.0%	2.7%	Benchmark Not Achieved
• Occupancy Rate	98%	98%	97%	Benchmark Not Achieved
• Emergency Work Orders Completed or Abated in <24 hours	99%	99%	100%	Exceeds Benchmark
• Routine Work Orders Completed in <30 Days	5 Days	30 Days	10 Days	Exceeds Benchmark
• % Planned Inspections Completed	100%	100%	100%	Exceeds Benchmark
<b>Housing Choice Program (Section 8)</b>				
• Budget Utilization Rate	98%	98%	108%	Exceeds Benchmark
• Success Rates (Lease-up)	N/A	66%	39%	Benchmark Not Achieved
• % Planned Annual Inspections Completed	98%	98%	94%	Benchmark Not Achieved
• Quality Control Inspections	≥ 1.4%	≥ 1.4%	2.3%	Exceeds Benchmark
<b>Community and Support Service</b>				
• Resident Homeownership	6	6	0	Benchmark Not Achieved
• Resident Workforce Participation	6,415	6,236	5,712	Benchmark Not Achieved
<b>Finance</b>				
• Project-Based Financial Closings	N/A	3	0	Benchmark Not Achieved

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

**Public Housing** - Overall, COVID-19 pandemic protocols affected rent collection, move-ins, move-outs, program graduations, and end-of-program actions. The protocols limited organic attrition, which influenced leasing operations. Further, AH strategically operated several communities under a leasing moratorium to provide vacant units in connection with planned RAD conversions.

**Housing Choice Program** - AH's service jurisdiction is competitive and COVID-19 pandemic protocols reduced the availability of units and families' ability to search and lease up units before June 30, 2021. Although AH implemented virtual inspections pursuant to COVID-19 protocols, limited technology proficiency among some residents and smaller landlords prevented AH from reaching all units and had to carryover those inspections.

**Community and Support Service** - AH's Down Payment Assistance (DPA) Program, is voluntary and predicated on families interested in purchasing a home, as well as other factors. COVID-19 pandemic protocols affected some participants' employment status and desire to look for and purchase a home.

**Finance** - AH anticipated project-based financial closings through its HomeFlex Program and Public Housing unit conversions under the Rental Assistance Demonstration (RAD) Program. COVID-19 pandemic protocols delayed application submissions and approvals.

## **EXHIBIT OPS-1-B** **MINIMUM RENT POLICY IMPACT ANALYSIS**

### **POLICY BACKGROUND**

100% of the rental units in AH-Owned Communities and a portion, generally 40%, of the rental units in MIXED Communities (\*See Note below) are funded with operating subsidies under Section 9 of the 1937 Housing Act, as amended or modified by AH's MTW Agreement. AH's Minimum Rent Policy for these communities is outlined below. Part I, Article Eleven, Paragraphs 7 Amended and Restated Statement of Corporate Policies adopted by the Board of Commissioners on March 24, 2021 states:

- Residents paying an Income Adjusted Rent must pay a minimum rent of \$125, or such lesser or greater amount as Atlanta Housing may set from time to time.
- The minimum rent requirement does not apply to resident households in which all household members are either elderly and/or disabled, and whose sole source of income is Social Security, SSI, or other fixed annuity pension or retirement plans. Such resident households will still be required to pay the Income Adjusted Rent or Affordable Fixed Rent, as applicable.

\*NOTE: Mixed-income, mixed-finance rental communities, including AH-assisted units and HomeFlex units, in private developments are developed through public-private partnerships and are managed by the owner entity's professional property management agent. While AH does not own these communities, AH engages the respective owner entities and their property management agents in its capacity as both a partner and asset manager by actively monitoring performance, reviewing monthly and quarterly reports, making site visits and consulting with management agent representatives with respect to management and maintenance performance, financial oversight, compliance, and occupancy tracking. Management agents are responsible for implementing AH housing policies. Please note detailed results from these communities are not included in this analysis.

Rental assistance to households in the Housing Choice Tenant-Based Program within jurisdiction and HomeFlex Developments (\*See Note above) are covered under Section 8 of the 1937 Housing Act, as amended or modified by AH's MTW Agreement. AH's Minimum Rent Policy for households receiving rental assistance is outlined below. Part I, Article Eleven, Paragraphs 7, Amended and Restated Statement of Policies adopted by the Board of Commissioners on March 24, 2021 states:

- Participants must pay a minimum rent of \$125, or such other amount approved by Atlanta Housing.
- The minimum rent requirement does not apply to participant households in which all household members are either elderly and/or disabled.

### **DATA ANALYSIS**

**Chart 1** compares the FY 2020 and the FY 2021 rents paid by the households residing in AH-Owned Communities. The analysis excludes households in which all members are elderly or disabled and whose source of income is fixed income.

- In FY 2020, approximately 90% or 69 of the resident households paid rents greater than the Minimum Rent. Another 9% or 7 households paid rents at the \$125 Minimum Rent level. Additionally, less than 0.0% or 0 households of all resident households were paying less than the Minimum Rent.
- In FY 2021, approximately 98% or 1,178 of the resident households paid rents greater than Minimum Rent. Another 0.33% or 4% households paid rents at the \$125 Minimum Rent Level. Additionally, approximately 1.91% or 23 household of all households paid less than Minimum Rent.

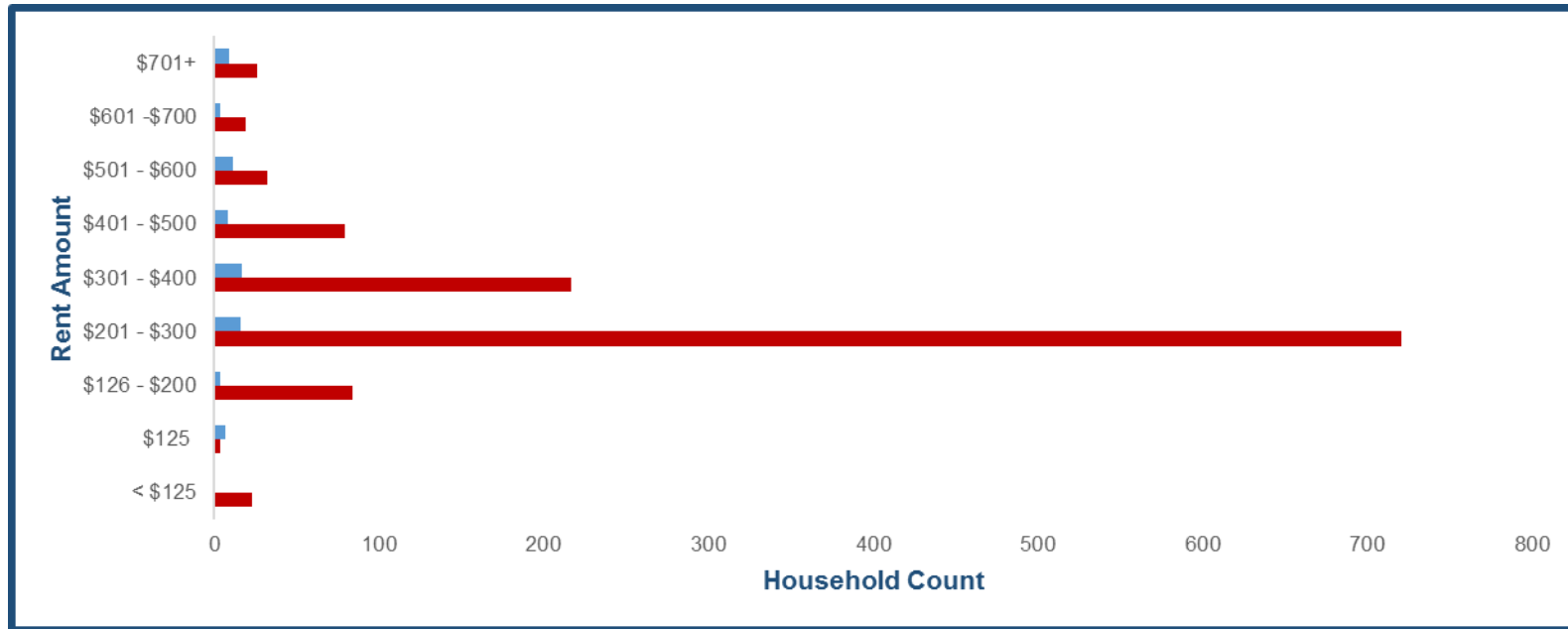
**Chart 2** compares the FY 2020 and the FY 2021 rents (Total Tenant Payment) paid by Housing Choice Tenant-Based Program households. The analysis excludes households in which all members are elderly or disabled.

- In FY 2020, approximately 90% or 8,493 of Housing Choice households paid rents greater than the Minimum Rent. Another 6% or 528 paid rents at the \$125 Minimum Rent level. Additionally, approximately 4% or 372 household of all households paid less than the Minimum Rent.
- In FY 2021, approximately 91% or 8,735 of Housing Choice households paid rents greater than the Minimum Rent. Another 6% or 536 paid rents at the \$125 Minimum Rent Level. Additionally, approximately 3.40% or 326 households of all households paid less than the Minimum Rent.

### **IMPACT ANALYSIS CONCLUSION**

The Minimum Rent Policy does not have a negative impact on assisted families because most assisted households are able to pay at or above the Minimum Rent of \$125. The policy also provides an opportunity for AH-assisted families to file an appeal for hardship.

**EXHIBIT OPS-1-B Chart 1 - Minimum Rent Policy Impact Analysis  
Households in Section 9 Operating Subsidy Funded Units  
AH-Owned Communities <sup>(1) (2)</sup>  
(As of June 30, 2021)**



**FY 2021\***

Rent Amount	< \$125	\$125	\$126 - \$200	\$201 - \$300	\$301 - \$400	\$401 - \$500	\$501 - \$600	\$601 - \$700	\$701+
HH Count	23	4	84	721	217	79	32	19	26
% of HHs	1.9%	0.3%	7.0%	59.8%	18.0%	6.6%	2.7%	1.6%	2.2%

**FY 2020\***

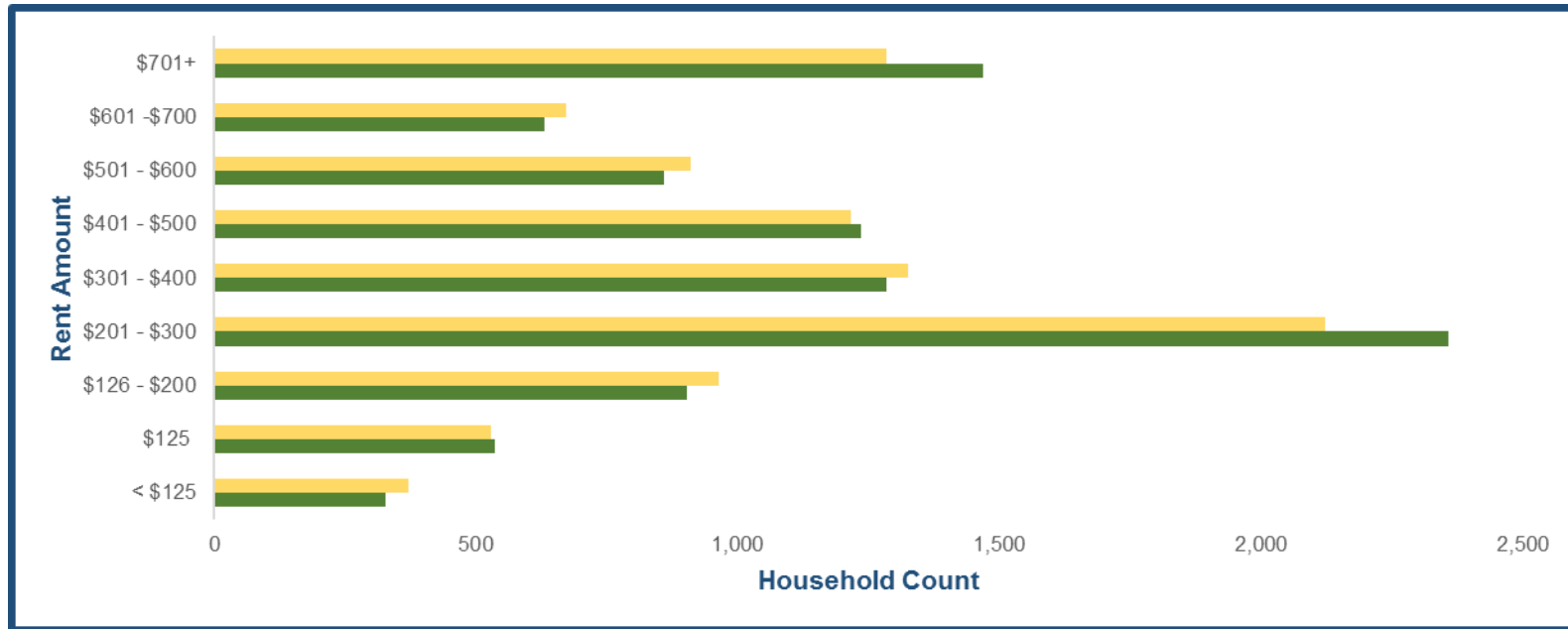
Rent Amount	< \$125	\$125	\$126 - \$200	\$201 - \$300	\$301 - \$400	\$401 - \$500	\$501 - \$600	\$601 - \$700	\$701+
HH Count	0	7	4	16	17	8	11	4	9
% of HHs	0.0%	0.6%	0.3%	1.3%	1.4%	0.7%	0.9%	0.3%	0.7%

\*Note: HH = Households.

(1) Excludes Households that are exempt under the Minimum Rent policy (i.e. households in which all members are elderly or disabled and whose source of income is fixed income).

(2) Rent amounts may vary between years with turnover based on changes in household types.\*Pandemic protocols reduce the number of households paying rent.

**EXHIBIT OPS-1-B Chart 2 - Minimum Rent Policy Impact Analysis**  
**Households Receiving Section 8 Subsidy**  
**Housing Choice Tenant-Based Program <sup>(1)</sup> <sup>(2)</sup>**  
 (As of June 30, 2021)



**FY 2021\***

Rent Amount	< \$125	\$125	\$126 - \$200	\$201 - \$300	\$301 - \$400	\$401 - \$500	\$501 - \$600	\$601 - \$700	\$701+
<b>HH Count</b>	326	536	902	2,357	1,284	1,236	858	630	1,468
<b>% of HHs</b>	3.4%	5.6%	9.4%	24.6%	13.4%	12.9%	8.9%	6.6%	15.3%

**FY 2020\***

Rent Amount	< \$125	\$125	\$126 - \$200	\$201 - \$300	\$301 - \$400	\$401 - \$500	\$501 - \$600	\$601 - \$700	\$701+
<b>HH Count</b>	372	528	964	2,121	1,326	1,216	910	673	1,283
<b>% of HHs</b>	3.9%	5.5%	10.0%	22.1%	13.8%	12.7%	9.5%	7.0%	13.4%

\*Note: HH = Households.

(1) Excludes Households that are exempted under the Minimum Rent policy (households in which head of household, spouse, or co-head of household are elderly or disabled).

(2) Rent amounts may vary between years with turnover based on changes in household types.

## **EXHIBIT OPS-1-C**

### **ELDERLY AND NON-ELDERLY DISABLED INCOME DISREGARD POLICY IMPACT ANALYSIS**

#### **POLICY BACKGROUND**

Part I, Article Eleven, Paragraph 1 of the Amended and Restated Statement of Corporate Policies adopted by the Board of Commissioners on March 24, 2021 states:

AH, in determining annual household income, will disregard the employment income of an Elderly Person or Non-Elderly Disabled Person whose sole source of income is Social Security, SSI, and/or other similar fixed income received from a verified plan (Annual Fixed Income), provided the employment income does not reduce or result in the discontinuance of the Elderly Person's or Non-Elderly Disabled Person's sole source of Annual Fixed Income.

Part II of the Amended and Restated Statement of Policies adopted by the Board of Commissioners on March 24, 2021 provides the policy direction for HomeFlex (f/k/a Project Based Rental Assistance). Under HomeFlex, all program activities are administered at the property level by the owner entity's professional management agent. Although HomeFlex is administered independent of and separate from the Housing Choice Tenant-Based Program, the Elderly and Non-Elderly Disabled Income Disregard policy as stated above is applicable to HomeFlex households.

#### **DATA ANALYSIS**

**Chart 1** – Of Elderly households assisted in AH-Owned Communities, only 4.14% (34 households) are subject to the policy. Of households assisted in MIXED HomeFlex Communities, only 2.82% (31 households) are subject to the policy. Of households assisted in HomeFlex Developments, only 3.45% (106 households) of Elderly households are subject to the policy. Of households assisted in AH's Housing Choice Voucher program, only 13.73% (221 households) of Elderly households are subject to the policy. Of households assisted in Mixed Public Housing Communities, only 2.62% (8 households) are subject to the policy. Of households assisted in Rental Assistance Demonstration and Project Based Voucher program, 2.97% (14 households) are subject to the policy.

**Chart 2** – For households with Non-Elderly Disabled members, a similar picture emerges. Of Non-Elderly Disabled households assisted in AH-Owned Communities and MIXED HomeFlex Communities, only 2.24% (7 households) and 3.13% (2 households), respectively, are subject to the policy. Of households assisted in HomeFlex Developments, 2.37% (14 households) of Non-Elderly Disabled households are subject to the policy. Of households assisted in AH's Housing Choice Voucher program, 21.97% (411 households) of Non-Elderly Disabled households are subject to the policy. Of households assisted in MIXED Public Housing Communities and Rental Assistance Demonstration and Project Based Voucher programs, only 3.41% (7 households) and 5.95% (11 households) are subject to the policy,

#### **IMPACT ANALYSIS CONCLUSION**

Overall, the Elderly and Non-Elderly Disabled Income Disregard rent policy has a positive impact because it reduces the rent (or Total Tenant Payment\*) of assisted households by disregarding the employment income of household members with eligible fixed income and employment income.

*\*Total Tenant Payment is the assisted household's share of the rent and utilities before any adjustment for utility allowances.*

**EXHIBIT OPS-1-C Charts 1 and 2**  
**Analysis of Elderly and Non-Elderly Disabled**  
**Income Disregard Policy Impact**  
 (As of June 30, 2021)

**CHART 1**

HOUSEHOLDS WITH ELDERLY		FIXED INCOME AND EMPLOYMENT INCOME <i>DISREGARD APPLIES</i>	
Program Type	No.	No.	% of Total Households
AH-Owned Communities	821	34	4.14%
MIXED HomeFlex Communities	1,099	31	2.82%
MIXED PH Communities	305	8	2.62%
MIXED RAD Communities	146	7	4.79%
HomeFlex Developments	3,076	106	3.45%
RAD/PBV	471	14	2.97%
Housing Choice Tenant-Based Program	1,610	221	13.73%
<b>SUMMARY</b>	<b>7,528</b>	<b>421</b>	<b>5.59%</b>

**CHART 2**

HOUSEHOLDS WITH NON-ELDERLY DISABLED ADULTS		FIXED INCOME AND EMPLOYMENT INCOME <i>DISREGARD APPLIES</i>	
Program Type	No.	No.	% of Total Households
AH-Owned Communities	313	7	2.24%
MIXED Homeflex Communities	64	2	3.13%
MIXED PH Communities	205	7	3.41%
MIXED RAD Communities	82	2	2.44%
HomeFlex Developments	591	14	2.37%
RAD/PBV	185	11	5.95%
Housing Choice Tenant-Based Program	1,871	411	21.97%
<b>SUMMARY</b>	<b>3,311</b>	<b>454</b>	<b>13.71%</b>

**EXHIBIT OPS-1-D**  
**RENT SIMPLIFICATION POLICY IMPACT ANALYSIS**

**POLICY BACKGROUND**

Part I, Article Seven, Paragraph 2 of the Amended and Restated Statement of Corporate Policies adopted by the Board of Commissioners on March 24, 2021 states:

STANDARD INCOME DEDUCTIONS AND ASSET DETERMINATIONS: Atlanta Housing, in its discretion, may establish fixed-rate, or standard deduction and asset determination procedures to be used in calculating annual income. Standard income deductions would replace the calculation of income deductions based on actual expenses. Asset determinations would examine the nature and value of the asset in establishing procedures for setting a schedule of assets that would or would not be used in calculating annual income.

Prior to implementation of the Rent Simplification Policy, AH determined that across all programs, including Housing Choice Tenant-Based Program, HomeFlex (f/k/a Project Based Rental Assistance) Mixed-Income Developments, AH-Owned Communities, Rental Assistance Demonstration and Project Based Voucher and MIXED Communities, 80% to 85% of assisted families were not claiming “other deductions” relating to unreimbursed medical, attendant care and auxiliary apparatus, and child care expenses.

The goal of the Rent Simplification Policy is to streamline operations by eliminating the burden and potentially inaccurate process of verifying unreimbursed out-of-pocket expenses. The Standard Income Deductions improve and add value to the integrity and accuracy of rent and subsidy determinations and over time will result in improved operating efficiency and effectiveness across all programs. In addition, by increasing the amount of the HUD standard deduction for dependents from \$480 to AH’s standard deduction of \$750, and the HUD standard deduction for elderly/disabled families from \$400 to AH’s standard deduction of \$1,000, AH’s Standard Income Deductions under the Rent Simplification Policy provide an equitable deduction approach applicable to all assisted families.

**DATA ANALYSIS**

The implementation of the Standard Income Deductions under the Rent Simplification Policy is based on an appeals process that allows families to file for hardships. Based on the **Chart 1** below, **zero (0) assisted households submitted hardship requests because of the policy.**

**Chart 1**

**COMPARISON OF NUMBER OF HARDSHIP REQUESTS TO NUMBER OF HOUSEHOLDS BENEFITING FROM AH’S STANDARD INCOME DEDUCTIONS**

(As of June 30, 2021)

Program Type	ELDERLY/DISABLED DEDUCTION						DEPENDENT DEDUCTION					
	Housing Choice Tenant Based	AH-Owned	Mixed HomeFlex	Mixed PH	HomeFlex	RAD/PBV	Housing Choice Tenant Based	AH-Owned	Mixed HomeFlex	Mixed PH	HomeFlex	RAD/PBV
<b>Total Number of Households Benefiting</b>	3,481	1,134	1,163	510	3,667	228	5,056	656	61	269	797	346
<b>Number with Hardship Requests</b>	0	0	0	0	0	0	0	0	0	0	0	0

**IMPACT ANALYSIS CONCLUSION**

The Rent Simplification Policy has a net positive impact and provides financial support for the preponderance of AH-assisted families. By comparison, only 15%–20% of assisted families that claimed other deductions relating to unreimbursed medical, attendant care and auxiliary apparatus, and childcare expenses benefited from the previous policy. The policy also provides an opportunity for AH-assisted families to file an appeal for hardship, if required. As shown above zero (0) families filed a hardship request because of the policy. The implementation of Standard Income Deductions is an effective method of providing assisted households with relief while, at the same time, streamlining the administrative processes of AH and its partners and improving accuracy, consistency, and operating efficiencies in the calculation of adjusted incomes.

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

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

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## Appendix C: Elements of Legacy Attachment B

### ELEMENT I. HOUSEHOLDS SERVED

*By Program/Housing Type*

Household Served Totals						
Community & Program Type	Assistance Type^	FY 2017 Actual	FY 2018 Actual	FY 2019 Actual	FY 2020 Actual	FY 2021 Actual
AH-Owned	PH	1,793	1,586	1,586	1,261	1,261
MIXED	PH	2,221	2,155	2,155	1,562	1,562
	RAD PBV	0	423	423	1,503	1,340
	HF	1,775	1,543	1,509	1,358	1,521
	LIHTC	1,171	1,131	1,084	1,088	1,081
HomeFlex	HF	3,364	4,012	4,232	4,803	4,841
	LIHTC	1,525	1,595	1,589	1,585	1,588
Housing Choice: Tenant-Based	HCV	8,381	8,608	9,094	9,393	9,597
Housing Choice: Ports	HCV	2,086	2,029	1,860	1,711	1,745
Housing Choice: Homeownership	HCV	25	23	19	18	17
Homeownership - Other	DPA	553	724	993	1,225	1,659
Short-Term Housing Assistance	MTW	199	215	389	244	295
<b>Totals:</b>		<b>23,093</b>	<b>24,044</b>	<b>24,933</b>	<b>25,751</b>	<b>26,507</b>

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

## Appendix C: Elements of Legacy Attachment B

### By Unit Size

Community & Program Type	FY 2020 Households by Unit Size						FY 2021 Households by Unit Size						2020 to 2021	
	0/1 BRs	2 BRs	3 BRs	4 BRs	5+ BRs	Total	0/1 BRs	2 BRs	3 BRs	4 BRs	5+ BRs	Total	# Change	% Change
AH-Owned	1,137	45	19	29	0	1,230	1,114	45	20	26	0	1,205	-25	-2.0%
MIXED	1,276	1,153	377	27	0	2,833	1,368	1,209	413	27	0	3,017	184	6.5%
RAD PBV Conversions	736	354	177	19	0	1,286	776	317	153	17	0	1,263	-23	-1.8%
HomeFlex	2,985	1,387	199	4	0	4,575	3,009	1,381	199	5	0	4,594	19	0.4%
Housing Choice: Tenant-Based	2,323	3,423	2,770	758	119	9,393	2,470	3,449	2,788	907	0	9,614	221	2.4%
Housing Choice: Ports	329	563	604	184	31	1,711	1,745	0	0	0	0	1,745	34	2.0%
<b>Totals:</b>	<b>8,786</b>	<b>6,925</b>	<b>4,146</b>	<b>1,021</b>	<b>150</b>	<b>21,028</b>	<b>10,482</b>	<b>6,401</b>	<b>3,573</b>	<b>982</b>	<b>0</b>	<b>21,438</b>	<b>410</b>	<b>1.9%</b>

## Appendix C: Elements of Legacy Attachment B

### By Family Composition

Community & Program Type	FY 2020 Households by Family Size						FY 2021 Households by Family Size						2020 to 2021	
	1 Member	2 Member	3 Member	4 Member	5+ Member	Total	1 Member	2 Member	3 Member	4 Member	5+ Member	Total	# Change	% Change
AH-Owned	1,099	78	15	14	24	1,230	1,081	75	12	14	23	1,205	-25	-2.0%
MIXED	1,617	559	355	183	118	2,832	1,723	601	369	195	129	3,017	185	6.5%
RAD PBV Conversions	797	234	146	64	46	1,287	819	215	141	52	36	1,263	-24	-1.9%
HomeFlex	3,353	823	241	104	54	4,575	3,344	844	249	104	53	4,594	19	0.4%
Housing Choice: Tenant-Based	2,955	2,372	1,747	1,179	1,140	9,393	3,091	2,387	1,804	1,190	1,142	9,614	221	2.4%
Housing Choice: Ports	337	309	327	362	376	1,711	350	311	334	370	380	1,745	1,745	2.0%
<b>Totals:</b>	<b>10,158</b>	<b>4,375</b>	<b>2,831</b>	<b>1,906</b>	<b>1,758</b>	<b>21,028</b>	<b>10,408</b>	<b>4,433</b>	<b>2,909</b>	<b>1,925</b>	<b>1,763</b>	<b>21,438</b>	<b>2,121</b>	<b>1.9%</b>

## Appendix C: Elements of Legacy Attachment B

### By Area Median Income (AMI) Group

Community & Program Type	FY 2020 Households by Income Group					FY 2021 Households by Income Group					2020 to 2021	
	≤ 30% AMI	31 - 50% AMI	51 - 80% AMI	> 80% AMI	Total	≤ 30% AMI	31 - 50% AMI	51 - 80% AMI	> 80% AMI	Total	# Change	% Change
AH-Owned	1,099	117	11	3	1,230	1,100	89	12	4	1,205	-25	-2.0%
MIXED	1,978	683	155	16	2,832	2,260	617	127	13	3,017	185	6.5%
RAD PBV Conversions	963	248	67	9	1,287	1,017	202	38	6	1,263	-24	-1.9%
HomeFlex	3,424	1,012	135	4	4,575	3,710	787	92	5	4,594	19	0.4%
Housing Choice: Tenant-Based	6,489	2,230	620	54	9,393	7,032	2,025	523	34	9,614	221	2.4%
Housing Choice: Ports	1,459	212	39	1	1,711	1,745	0	0	0	1,745	34	2.0%
<b>Totals:</b>	<b>15,412</b>	<b>4,502</b>	<b>1,027</b>	<b>87</b>	<b>21,028</b>	<b>16,864</b>	<b>3,720</b>	<b>792</b>	<b>62</b>	<b>21,438</b>	<b>410</b>	<b>1.9%</b>

	Total ≤ 50% AMI (VLI & ELI Families)	Total > 50% AMI
<b>Number of HHs by Income</b>	20,584	854
<b>% of HHs Served</b>	96%	4%

## Appendix C: Elements of Legacy Attachment B

### By Waiting List Characteristics

Community & Program Type	FY 2021 WL Households by Unit Size					FY 2021 WL Households by Family Size					FY 2021 WL HHs by Income Group				FY 2021 Total
	Studio	1 BR	2 BR	3 BR	4+ BR	1 Mbr	2 Mbr	3 Mbr	4 Mbr	5+ Mbr	≤ 30% AMI	31 - 50% AMI	51 - 80% AMI	> 80% AMI	
AH-Owned		1,576	93	76	3						1,578	154	13	3	1,748
MIXED	0	11,991	11,786	8,347	656						14,966	16,734	970	110	32,780
RAD PBV Conversions															0
HomeFlex	16	7,127	4,621	3,283	3						6,726	6,049	2,213	62	15,050
Housing Choice: Tenant-Based						4,929	7,130	5,713	3,485	2,777	19,176	4,072	642	144	24,034
<b>Totals:</b>	<b>16</b>	<b>20,694</b>	<b>16,500</b>	<b>11,706</b>	<b>662</b>	<b>4,929</b>	<b>7,130</b>	<b>5,713</b>	<b>3,485</b>	<b>2,777</b>	<b>42,446</b>	<b>27,009</b>	<b>3,838</b>	<b>319</b>	<b>73,612</b>

Note: Waiting List data is fluid and reflected data is a “snapshot” of each Waiting List as of June 30, 2021. Ongoing applicant selection and periodic purges throughout the year account for changes in totals.

## Appendix C: Elements of Legacy Attachment B

### ELEMENT II. OCCUPANCY POLICIES

Overall information is codified in AH's Statement of Corporate Policies (SCP), which is located on our website at [www.atlantahousing.org/news](http://www.atlantahousing.org/news). You may contact Lenny Koltochnik, Policy Research Director for AH at [Lenny.koltochnik@atlantahousing.org](mailto:Lenny.koltochnik@atlantahousing.org) with specific questions.

### ELEMENT III. CHANGES IN HOUSING STOCK

AH continues to reposition its public housing rental portfolio by converting rental 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 on page TBD of this document. Detailed information is included in our Annual Operating Budget and Comprehensive Annual Financial Report (CAFR).

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

Under this element, AH set a number of guidelines for its rental and housing assistance programs owned or managed by AH. Attachment D of AH's Amended and Restated MTW Agreement lists these guidelines, collectively referred to as MTW Program Benchmarks. AH provides actual performance of its MTW Program Benchmarks on page TBD of this document. AH postponed updating or changing these benchmarks during FY 2021 to focus on pandemic operating protocols.

#### 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.

## Appendix C: Elements of Legacy Attachment B

### **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 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 team links program participants with supportive services to assist them in overcoming barriers and obstacles preventing them from moving forward.

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

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

### **MTW PROGRAM BENCHMARK OUTCOMES**

AH directs the reader to **see page 91** of this document.

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

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### Background and Information

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

### Project-Based Approach for Public Housing Program

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

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

### Identification of Cost Allocation Approach

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

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

### Classification of Costs

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

## Appendix D: Local Asset Management Plan

### Definitions:

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

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

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

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

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

### AH Cost Objectives

AH has identified the following cost objectives:

#### **Direct Costs:**

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

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

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

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

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

### AH Direct Costs

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

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

1. Contract costs readily identifiable with delivering housing assistance to low-income families under the MTW Program,
2. Housing Assistance Payments, including utility allowances, for tenant-based voucher and HomeFlex (AH's Project-Based Rental Assistance Program) supported communities, including authorized incentive and other fees to maximize leasing,
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. Incentive and other fees authorized to support leasing,
2. Legal expenses,
4. Professional services,
5. Case management and other human services,
6. Relocation,
7. Extraordinary site work,
8. Demolition,
9. Acquisitions,
10. Program administration,
11. Gap financing in qualified real estate transactions,
12. Homeownership down payment assistance,
13. Investments, such as loans, grants, etc.,
14. Other development and revitalization expenditures.

## Appendix D: Local Asset Management Plan

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

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

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

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

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

In addition to the direct costs identified previously, when required to charge direct staff time to a non-MTW funding source, AH will allocate direct salary and wages based upon quantifiable measures (substitute system) of employee effort rather than timesheets. This substitute system is allowed under 2 CFR §200.430. The substitute system permits AH to allocate direct costs on measures that are readily determined for each department more efficiently and effectively. AH will re-evaluate those departments and measures periodically and update as necessary. Listed below are the Operating Divisions functions and measures effective July 1, 2020:

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

### AH Fee-For-Service

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

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

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

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

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

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

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

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## **APPENDIX E: Other Information**

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COVID-19 Waiver Utilization

Resident Satisfaction Survey Results - Abbreviated

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OVERVIEW: AH COVID-19 WAIVER UTILIZATION

Line #	Waiver	Statutory and Regulatory Applicability	Summary of Waiver/Alternative	Waiver Status	Adoption Date
1	PH and HCV-1 PHA 5-Year and Annual Plan	<u>Statutory Authority</u> Section 5A(a)(1), Section 5A(b)(1), Section 5A(g), Section 5A(h) <u>Regulatory Authority</u> § 903.5(a)(3), 903.5(b)(3), 903.21	<ul style="list-style-type: none"> <li>Alternative dates for submission</li> <li>Changes to significant amendment process</li> </ul>	Expired 12.31.20	April 24, 2020
2	PH and HCV-2 Family income and composition – delayed annual reexaminations	<u>Statutory Authority</u> Section 3(a)(1) <u>Regulatory Authority</u> § 982.516(a)(1), § 960.257(a)	<ul style="list-style-type: none"> <li>Permits the PHA to delay the annual reexamination of income and family composition</li> <li>HCV PHAs must implement HCV-7 for impacted families if they implement this waiver</li> </ul>	Expired 06.30.21 CY20 Re-exams due 12.31.20 Jan – Dec 2021 due by 12.31.20	March 30, 2020
3	PH and HCV-3 Annual reexamination Income Verification	<u>Regulatory Authority</u> § 5.233(a)(2) <u>Sub-regulatory Guidance</u> PIH Notice 2018-18	<ul style="list-style-type: none"> <li>Waives the requirements to use the income hierarchy, including the use of Enterprise Income Verification (EIV) System, and will allow PHAs to consider self-certification as the highest form of income verification</li> <li>PHAs that implement this waiver will be responsible for addressing material income discrepancies that may arise later</li> </ul>	Active thru 12.31.21	March 23, 2020
4	PH and HCV-4 Interim reexaminations	<u>Statutory Authority</u> Section 3(a)(1) <u>Regulatory Authority</u> § 5.233(a)(2), 982.516(c)(2), 960.257(b) and (d) <u>Sub-regulatory Guidance</u> PIH Notice 2018-18	<ul style="list-style-type: none"> <li>Waives the requirement to use the income verification requirements, including the use of EIV, for interim reexaminations</li> </ul>	Active thru 12.31.21	March 23, 2020

## Appendix E: COVID-19 Waiver Utilization

Line #	Waiver	Statutory and Regulatory Applicability	Summary of Waiver/Alternative	Waiver Status	Adoption Date
8	HQS-1 Initial inspection	<u>Statutory Authority</u> Section 8(o)(8)(A)(i), Section 8(o)(8)(C) <u>Regulatory Authority</u> § 982.305(a), 982.305(b), 982.405	<ul style="list-style-type: none"> <li>Changes initial inspection requirements, allowing for owner certification that there are no life-threatening deficiencies</li> <li>Where self-certification was used, PHA must inspect the unit no later than October 31, 2020.</li> </ul>	Active thru 12.31.21 and 06.30.22 (depending on HQS timing)	March 23, 2020
10	HQS-3 Non-Life Threatening HQS - Initial Unit Approval	<u>Statutory Authority</u> Section 8(o)(8)(A)(ii) <u>Regulatory Authority</u> HOTMA HCV Federal Register Notice January 18, 2017	<ul style="list-style-type: none"> <li>Allows for extension of up to 30 days for owner repairs of non-life threatening conditions</li> </ul>	Active thru 12.31.21	March 30, 2020
11	HQS-4 Initial HQS - Alternative Inspections	<u>Statutory Authority</u> Section 8(o)(8)(A)(iii) <u>Regulatory Authority</u> HOTMA HCV Federal Register Notice January 18, 2017	<ul style="list-style-type: none"> <li>Under Initial HQS Alternative Inspection Option - allows for commencement of assistance payments based on owner certification there are no life-threatening deficiencies</li> <li>Where self-certification was used, PHA must inspect the unit no later than October 31, 2020.</li> </ul>	Active thru 12.31.21 and 06.30.22 (depending on HQS timing)	March 23, 2020
12	HQS-5 Biennial Inspections	<u>Statutory Authority</u> Section 8(o)(D) <u>Regulatory Authority</u> §§ 982.405(a), 983.103(d)	<ul style="list-style-type: none"> <li>Allows for delay in biennial inspections</li> <li>All delayed biennial inspections must be completed as soon as reasonably possible but by no later than October 31, 2020.</li> </ul>	Active thru 12.31.21 and 06.30.22 (depending on HQS timing)	March 30, 2020
13	HQS-6 Interim Inspections	<u>Statutory Authority</u> Section 8(o)(8)(F) <u>Regulatory Authority</u> §§ 982.405(g), § 983.103(e)	<ul style="list-style-type: none"> <li>Waives the requirement for the PHA to conduct interim inspection and requires alternative method</li> <li>Allows for repairs to be verified by alternative methods</li> </ul>	Active thru 12.31.21	April 20, 2020
16	HQS-9 HQS QC Inspections	<u>Regulatory Authority</u> § 982.405(b)	<ul style="list-style-type: none"> <li>Provides for a suspension of the requirement for QC sampling inspections</li> </ul>	Active thru 12.31.21	March 23, 2020

## Appendix E: COVID-19 Waiver Utilization

Line #	Item	Statutory and Regulatory Applicability	Summary of Waiver/Alternative	Waiver Status	Adoption Date
20	HCV-2 PHA Oral Briefing	<u>Regulatory Authority</u> § 982.301(a)(3) § 983.252(a)	<ul style="list-style-type: none"> <li>• Waives the requirement for an oral briefing</li> <li>• Provides for alternative methods to conduct required voucher briefing</li> </ul>	Active thru 12.31.21	March 16, 2020
21	HCV-3 Term of Voucher - Extensions of Term	<u>Regulatory Authority</u> § 982.303(b)(1)	<ul style="list-style-type: none"> <li>• Allows PHAs to provide voucher extensions regardless of current PHA policy</li> </ul>	Active thru 12.31.21	March 16, 2020
23	HCV-5 Absence from unit	<u>Regulatory Authority</u> § 982.312	<ul style="list-style-type: none"> <li>• Allows for PHA discretion on absences from units longer than 180 days</li> <li>• PHAs must not make HAP payments beyond 12/31/20 for units vacant more than 180 consecutive days</li> </ul>	Active thru 12.31.21	May 1, 2020
24	HCV-6 Automatic Termination of the HAP Contract	<u>Regulatory Authority</u> § 982.455	<ul style="list-style-type: none"> <li>• Allows PHA to extend the period of time after the last HAP payment is made before the HAP contract terminates automatically.</li> </ul>	Active thru 12.31.21	March 13, 2020
25	HCV-7 Increase in Payment Standard	<u>Regulatory Authority</u> § 982.505(c)(4)	<ul style="list-style-type: none"> <li>• Provides PHAs with the option to increase the payment standard for the family at any time after the effective date of the increase, rather than waiting for the next regular reexamination to do so.</li> </ul>	Active thru 12.31.21	May 1, 2020
26	HCV-8 and PH-9 Utility Allowance Schedule	<u>Regulatory Authority</u> § 982.517 and § 965.507	<ul style="list-style-type: none"> <li>• Provides for delay in updating utility allowance schedule</li> </ul>	Active thru 12.31.21	July 1, 2020
28	HCV-10 FUP	<u>Statutory Authority</u> Section 8(x)(2)	<ul style="list-style-type: none"> <li>• Allows PHAs to increase age to 26 for foster youth initial lease up</li> </ul>	Active thru 12.31.21	April 20, 2020
30	PH-2 Total Development Costs	<u>Regulatory Authority</u> § 905.314(c)	<ul style="list-style-type: none"> <li>• Waives the TDC and HCC limits permitting approval of amounts in excess of published TDC by 25% to 50% on a case by case basis</li> </ul>	Active thru 12.31.21 (submissions due)	April 20, 2020
42	12a Form HUD 50058	<u>Regulatory Authority</u> 24 CFR Part 908, § 982.158  <u>Sub-regulatory Guidance</u> PIH Notice 2011-65	<ul style="list-style-type: none"> <li>• Waives the requirement to submit 50058 within 60 days</li> <li>• Alternative requirement to submit within 90 days of the effective date of action</li> </ul>	Expired 12.31.20	April 20, 2020

## Appendix E: Resident Satisfaction Survey

Annually, AH surveys program participants to ascertain their feedback regarding a number of areas. Below are respondent demographics and the overall satisfaction category. Results of the entire survey are available upon request through email: [strategy@atlantahousing.org](mailto:strategy@atlantahousing.org).

### Atlanta Housing FY 2021 Resident Satisfaction Survey Summary of Results

<b>Demographics</b>					
	<b>Under 49</b>	<b>50 - 69</b>	<b>70+</b>	<b>No Response</b>	
<b>1. Please indicate your age group.</b>					
Number of responses	<b>46</b>	<b>281</b>	<b>200</b>	<b>10</b>	
Total number of surveys returned	<b>537</b>	<b>537</b>	<b>537</b>	<b>537</b>	
Percentage	<b>8.6%</b>	<b>52.3%</b>	<b>37.2%</b>	<b>1.9%</b>	
	<b>Fewer than 5 years</b>	<b>5 to 9 years</b>	<b>10 to 15 years</b>	<b>More than 15 years</b>	<b>No Response</b>
<b>2. How many years have you lived in this community?</b>					
Number of responses	<b>172</b>	<b>125</b>	<b>102</b>	<b>103</b>	<b>35</b>
Total number of surveys returned	<b>537</b>	<b>537</b>	<b>537</b>	<b>537</b>	<b>537</b>
Percentage	<b>32.0%</b>	<b>23.3%</b>	<b>19.0%</b>	<b>19.2%</b>	<b>6.5%</b>
<b>Overall Satisfaction</b>					
	<b>Poor</b>	<b>Average</b>	<b>Good</b>	<b>Very Good</b>	<b>No Response</b>
<b>3. How do you rate your quality of life in your community?</b>					
Number of responses	<b>16</b>	<b>92</b>	<b>188</b>	<b>233</b>	<b>8</b>
Total number of surveys returned	<b>537</b>	<b>537</b>	<b>537</b>	<b>537</b>	<b>537</b>
Percentage	<b>3.0%</b>	<b>17.1%</b>	<b>35.0%</b>	<b>43.4%</b>	<b>1.5%</b>
	<b>Yes</b>	<b>No</b>	<b>No Response</b>		
<b>4. Would you tell a friend or family member to move to your community?</b>					
Number of responses	<b>443</b>	<b>76</b>	<b>18</b>		
Total number of surveys returned	<b>537</b>	<b>537</b>	<b>537</b>		
Percentage	<b>82.5%</b>	<b>14.2%</b>	<b>3.4%</b>		

The total of 537 represents the total number of surveys that were returned by residents. The "No Response" category is inclusive of individuals who returned the survey but did not respond to a particular question on the survey AND those who returned the survey with more than one response to the particular question.