



# FY 2022

## MOVING - TO - WORK (MTW)

# ANNUAL REPORT

Board Adopted: September 28, 2022  
HUD Submission: September 30, 2022  
**HUD Acceptance: May 15, 2023**



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

OFFICE OF PUBLIC AND INDIAN HOUSING

May 15, 2023

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 FY2022 Annual Moving to Work Report

Dear Mr. Jones:

The Department of Housing and Urban Development has completed its review of Atlanta Housing's (AH) FY2022 Annual MTW Report, which was initially submitted on September 27, 2022. I am writing to inform you that AH's FY2022 Annual MTW Report, as submitted on September 27, 2022, 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,

A handwritten signature in black ink that reads "John M. Concannon".

John Concannon  
Moving to Work Program Director  
Office of Public Housing Investments

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

# AH Leadership

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# I. INTRODUCTION

## About Atlanta Housing

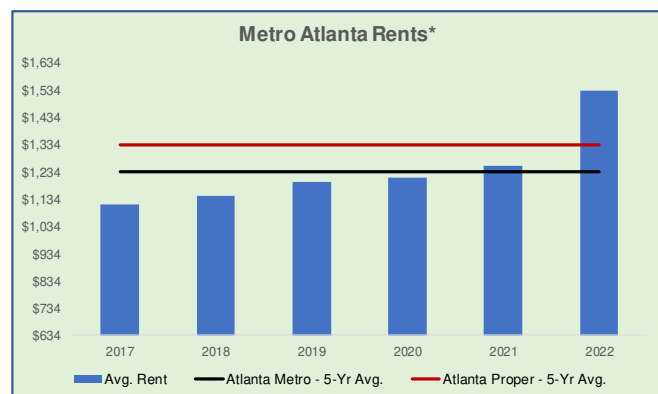
The Housing Authority of the City of Atlanta, Georgia, also referred to as Atlanta Housing (AH) provides rental assistance to low-income families across the city of Atlanta. AH is considered the oldest public housing authority (PHA) with the construction of the first federal public housing community, Techwood Homes, in 1935. In addition, the first federally subsidized housing community for African American residents, University Homes, was also built in Atlanta near Atlanta University. AH is the largest public housing authority in Georgia and serves nearly 45,000 people. Its portfolio includes the following properties and programs:

- **AH-Owned Communities:** 7 public housing sites: 5 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. AH elected to deploy and utilize Project-Based Vouchers in the administration of this 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 built on land owned by AH and ground leased long-term to the owner/developer, 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.

## The Need for Affordable Housing in Atlanta

Atlanta, the “capital of the south”, remains one of the fastest growing metropolitan areas in the country. Several factors have contributed to this growth: comfortable climate, business-friendly environment across many industries, and its 57 colleges and universities, which attract companies eager to tap into the talents of diverse and highly skilled employees.

However, Atlanta's rapid growth, combined with a variety of broader economic factors such as the COVID-19 pandemic, has resulted in significantly higher housing costs as well. Rents in Atlanta have grown 22 percent since January 2021 through June 2022<sup>1</sup> and Freddie Mac continues to forecast Atlanta in the top rent growth areas in the country<sup>2</sup>. Similarly, homeownership costs have dramatically increased as well, rising 24.8% between July 2021 and June 2022<sup>3</sup>.



Source: [apartmentlist.com/research](https://www.apartmentlist.com/research); \*As of June 30, 2022

<sup>1</sup> Source: *Apartment List* Metro-Level Historic Estimates, <https://www.apartmentlist.com/research/category/data-rent-estimates>, shows \$1,258 January 2021 and \$1,577 for June 2022.

<sup>2</sup> Source: <https://www.multihousingnews.com/freddie-mac-forecasts-continued-multifamily-growth-in-2022/#:~:text=The%20metros%20that%20are%20expected,Ariz.%2C%20at%207.1%20percent.>

<sup>3</sup> Source: S&P CoreLogic Case-Shiller Home Price Index.

## Moving-to-Work (MTW)

As an MTW PHA<sup>4</sup>, AH deploys its MTW Authorizations to combine program funds and waive certain program rules and regulations<sup>5</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.

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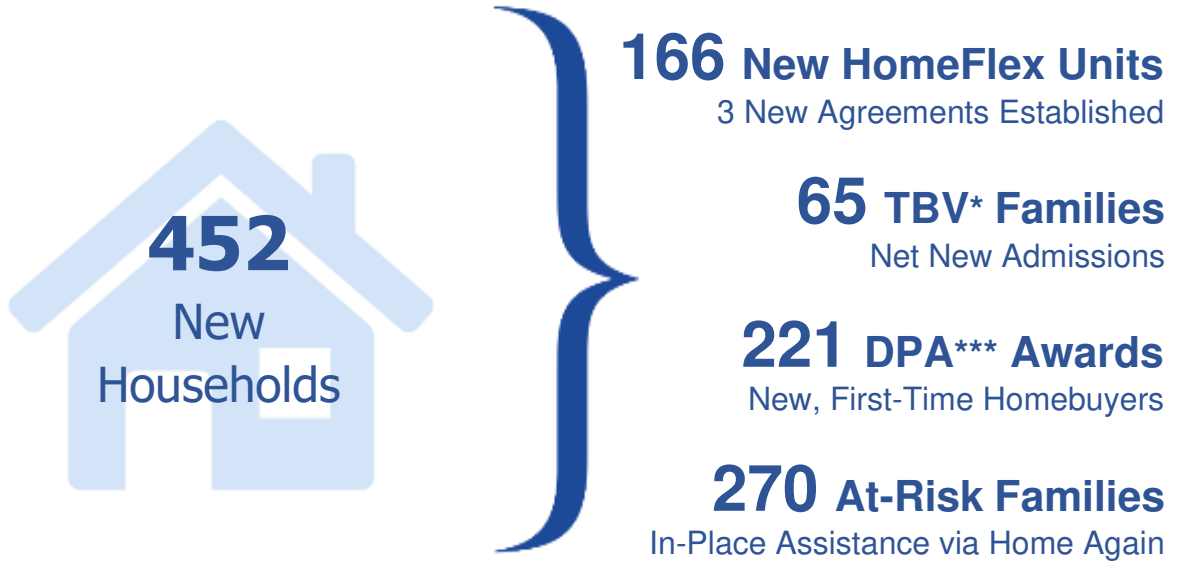
<sup>4</sup> There were 39 MTW PHAs prior to new legislation that adds 100 MTW cohorts. AH received its MTW designation in 2003.

<sup>5</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 2022 HIGHLIGHTS

## 452 New Households

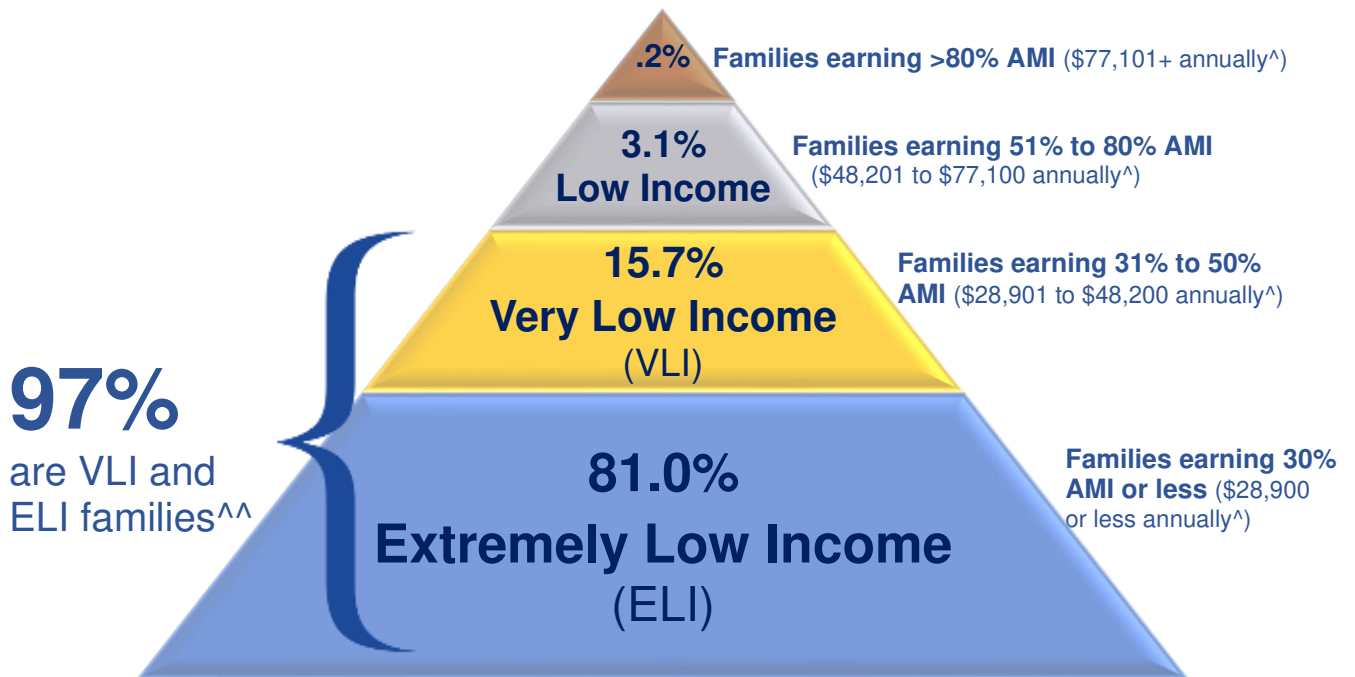
(New units occupied by new program participants)



## 26,619 Households Served in FY 2022

\*TBV = Tenant-Based Voucher; \*\*EHV = Emergency Housing Vouchers, \*\*\*DPA = Down Payment Assistance

### Assisted Households Breakdown by Area Median Income (AMI)<sup>^</sup>



<sup>^</sup>Area Median Income (AMI) is the household income for the median – or middle – household in a region. HUD classifies families as high- or low-income based on AMI data that it publishes annually. This graph is based on HUD Income Limits from April 2022 for a Family of Four.

## FY 2022 Highlights

- **AH created 667 new affordable housing units:**
  - AH created 280 affordable units by financially closing 3 projects.
    - 1 project was part of the University Homes Choice Neighborhoods Implementation Grant that helped to create 56 of the 289 affordable units.
  - AH created 221 affordable units through Down Payment Assistance to eligible first-time homebuyers.
  - AH created 166 affordable units by executing 4 new HomeFlex Agreements.
  - AH issued 2 development Requests for Proposals for development projects in Midtown (Civic Center) and Northwest Atlanta (Bowen Homes).
  - AH received a \$450,000 Choice Neighborhoods Planning Grant to develop a transformational plan for Bowen Homes.
- **AH preserved 1,097 existing affordable housing units:**
  - AH preserved 938 units by renewing 16 expiring HomeFlex Agreements.
  - AH preserved 159 units by converting 2 public housing communities to project-based voucher (PBV) communities under the Rental Assistance Demonstration (RAD) Program.
- AH **housed 674 families** from the Housing Choice Voucher waiting list.
- AH **housed 102 families** with Emergency Housing Vouchers (EHVs) to further assist households at-risk of or experiencing homelessness.
- AH **assisted 6,030 target families to maintain compliance** with the work/program requirement<sup>6</sup> that included encouraging compliant families to retain employment and helping non-compliant families to return to work.
- AH facilitated **14 scholarships totaling \$72,000** to AH-assisted youths.

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<sup>6</sup> AH requires work-able participants to be employed an average of 20 hours per week to meet program compliance.

## Ib. INTRODUCTION: FY 2022 ACCOMPLISHMENTS

This section summarizes existing activities that AH administered, implemented, or accomplished during FY 2022.

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

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

Details of AH's MTW Activities are listed in Section IV.A.: Implemented Activities of this document. The FY 2022 activities are organized based on their alignment with the agency's strategic priorities:

#### Housing

##### *Housing Development & Creation*

- AH worked closely with HUD and external partners to advance Co-Investment projects under its **Gap Financing** MTW Activity and Notice PIH 2011-45, which permits AH to create local, non-traditional (LNT) housing opportunities for low-income families. In addition, AH uses this activity to provide “bridge loans”, while continuing to investigate opportunities for a short-term Construction Loan Program in cooperation with the Urban Revitalization Demonstration (URD) Office.
  - AH financially closed on 2 co-investment projects to create 224 affordable housing units.
    - 116 units at Madison Reynoldstown, which is a 100% affordable community; and
    - 108 units at Juanita Gardner (f.k.a. Harmony Bakers Ferry), which is a 100% affordable community.
- AH created 166 new affordable housing units by executing 3 agreements under the **HomeFlex as a Strategic Tool** MTW Activity, which allows AH to create affordable housing units at market rate communities, including:
  - 5 units at Academy Lofts at Adair Park under a HomeFlex Supportive Housing Agreement;
  - 67 units at Capitol View:
    - 43 units under a Standard HomeFlex Agreement;
    - 24 units under a HomeFlex Supportive Housing Agreement; and
  - 94 units at London Townhomes with multiple Standard HomeFlex Agreements.
- In FY 2022, AH provided 221 Down Payment Assistance (DPA) awards under the **Comprehensive Homeownership Program** MTW Activity to eligible, qualified first-time homebuyers.
- Construction costs, and other factors during FY 2022 delayed implementation of AH's newest MTW Activity, “**Choice Neighborhoods Down Payment Assistance Program.**” AH expects to partially implement this activity during FY 2023 and move to full implementation during FY 2024.

##### *Housing Preservation*

- HomeFlex Agreements executed under the **HomeFlex as a Strategic Tool** MTW Activity expire and must be renewed to preserve affordability at market rate communities. AH preserved 938 existing units by renewing 16 HomeFlex Agreements. Unit counts and communities include:
  - 46 units at Adamsville Green Senior Apts – Standard HomeFlex for Older Persons (HFOS)
  - 8 units at Ashley at Auburn Pointe – Standard HomeFlex
  - 5 units at Ashton at Browns Mill – Standard HomeFlex
  - 78 units at Columbia Blackshear Senior Apts – Standard HFOS
  - 44 units at Heritage Green Apts – Standard HomeFlex
  - 88 units at Heritage Station I – Standard HomeFlex
  - 150 units at Heritage Station II – Standard HFOS
  - 100 units at Manor at Scott's Crossing – Standard HomeFlex

- 32 units at Odyssey at Villas – Standard HomeFlex
- 76 units at O’Hern House – Standard HFOS
- 32 units at Parkside at Mechanicsville – Standard HomeFlex
- 10 units at Quest Village – HomeFlex Supportive Housing (HAVEN)
- 90 units at Veranda at Carver Senior – Standard HFOS
- 102 units at Veranda at Auburn Pointe III – Standard HomeFlex
- 36 units at Villas of H.O.P.E. – HomeFlex Supportive Housing (HAVEN)
- 41 units at Welcome House – HomeFlex Supportive Housing (HAVEN)

### *Homelessness Prevention*

- AH deployed MTW flexibilities under its **Develop Alternate and Supportive Housing Resources** MTW Activity to create or continue assistance programs for target population groups. Efforts assisted 1,063 low-income Atlantans experiencing or at risk of homelessness. Households counts by respective program include:
  - 102 EHV households. AH deploys MTW flexibilities (as approved) to maximize utilization in the administration of this temporary HUD program;
  - 270 Home Again households, receiving short-term housing assistance;
  - 691 Special Program Vouchers (SPVs) to assist defined targeted population group(s). SPV household count and programs include:
    - 88 COVID Rapid Support Housing (CRSHP) Program households;
    - 391 FLOW households, a collaborative initiative with Partners for Home (PFH); the City of Atlanta, Mercy Care, Grady Health Systems, and the United Way of Atlanta;
    - 25 Georgia Housing Choice Voucher households;
    - 75 Housing First Voucher (HFV) households;
    - 29 Integrated Care Permanent Supportive Housing (ICPSH) households;
    - 18 RISE II households, a pilot program with PFH; and
    - 65 Special Program Vouchers for Homeless Students households. This initiative works closely with Atlanta Public Schools (APS) to identify students experiencing housing instability. The vouchers are also known as APS vouchers.

### *Housing Administration*

- AH continued efforts to align property management activities under its **HomeFlex On-Site Site-Based Administration** MTW Activity, including:
  - Retaining the flexibility to project-base 100% assistance at communities owned directly or indirectly by AH, without a competitive procurement process pursuant to its MTW Agreement.
  - Resuming regular, periodic training opportunities and business process reviews (BPRs) for property-manager developers (PMDs) and housing partners at all assisted communities. Examples of routine and recurring training, as well as specialized training may include:
    - New Hire Onboarding.
    - Back-to-Basics for AH-Owned and AH-Assisted units.
    - Upload and update resident demographics via HUD Form 50058.
    - Utilization of HUD EIV/IVT Tool.
    - AH HomeFlex/HAVEN Program dynamics.
    - Strategies and techniques to reduce subsidy delays or subsidy losses.

## Self-Sufficiency

### Family Independence

- AH prepared new Housing Choice Voucher (HCV) families for life after rental assistance in areas of high opportunity through a curriculum established under the **Good Neighbor Program (GNP) II** MTW Activity. 96% of new HCV participants completed the GNP curriculum.
- AH prepared 201 existing HCV families enrolled in **Human Development Services**<sup>7</sup> for housing self-sufficiency and economic independence through coaching referrals, and other techniques.
- AH exceeded its FY 2022 **Work/Program Requirement** goal by achieving a 76% compliance rate (72% weighted). by providing guidance and referral services to target households<sup>8</sup>. 6,030 of 8,408 target households reported having earned income in the household.



### NEW MTW ACTIVITIES

AH did not propose any new MTW Activities for approval during FY 2022.

### CURRENT MTW ACTIVITIES

AH reviewed existing MTW Activities to ensure relevancy and applicability during FY 2022. Current activities are under Section IV.A. Implemented Activities.

- AH continued the administration of its approved MTW Activities highlighted by the following:
  - AH continued to work closely with HUD and external partners to advance redevelopment projects under its **Revitalization Program**. These projects are in-progress and located on AH-owned land.
  - AH continued to deploy flexibilities under the **Rent Simplification/AH Standard Deduction** MTW Activity to improve and shorten the lease-up process by minimizing calculation errors and reducing paperwork.
  - AH continued to utilize elements under its **Leasing Incentive Fee (LIF)** MTW Activity to assist eligible low-income families with move-in expenses. The LIFs may also contribute to the retention of some Housing Choice partners that provide housing units.
  - AH continued to work closely with HUD and external partners to advance program designs that increase homeownership opportunities for low-income families within the University Choice Neighborhood (UCN) boundaries. Under AH's **Choice Down Payment Assistance (Choice DPA) Program** AH plans to assist up to seven eligible first-time homebuyers with DPA to create affordable housing opportunities in the UCN.
  - AH continued to improve utility efficiency ratings at AH-owned sites by conducting annual measurements and validation audits to maximize energy and water efficiency ratings after RAD conversions, and by encouraging housing partners to improve utility efficiency.

### DATED MTW ACTIVITIES

Review of activities identified as obsolete activities that are listed under Section IV.D. Closed Out Activities. AH closed out the following MTW Activities:

- AH returned operations to the standard abatement policy (24 CFR §983.208(b)(2)) and closed out the **HCV Housing Program Housing Assistance Payment Abatement Policy** activity.
- AH does not require MTW Authorization to administer an **Aging-Well Program**.
- AH does not require MTW Authorization to administer Veterans Affairs Supportive Housing (VASH) vouchers, which can be project-based pursuant to Housing Opportunities Through Modernization Act of 2016<sup>9</sup>. Therefore, AH closed out its **Veterans Supportive Housing** activity.

<sup>7</sup> AH's Family Self-Sufficiency (FSS) Program.

<sup>8</sup> Non-exempt residents aged 18-61.

<sup>9</sup> [https://www.hud.gov/sites/dfiles/PIH/documents/HUD-VASH\\_PBV\\_Guidance.pdf](https://www.hud.gov/sites/dfiles/PIH/documents/HUD-VASH_PBV_Guidance.pdf) and PIH Notice 2017-21 provides additional consideration.

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

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

### Housing

#### *Housing Development & Creation*

- AH expended University Choice Neighborhoods Implementation Grant funds to create 56 new affordable housing units by financially closing Ashley IC (total of 72 units). Ashley IC is a Choice Atlanta community that will have 28 Choice workforce units and 28 HomeFlex units.
- AH worked closely with HUD and external partners to advance its real estate development pipeline. AH pursued activities during FY 2022 that complement AH's goal to create quality, affordable units. Highlighted activities include:
  - Optimizing its development strategy by prioritizing the creation of affordable housing units in amenity-rich communities, or in proximity to quality schools or transit-connected neighborhoods.
  - Evaluation and preparation for future Choice Neighborhoods grant application(s) in support of Quality-of-Life Initiatives such as:
    - An implementation grant for Bowen Homes
    - A planning or implementation grant for Thomasville Heights.
- AH worked closely with HUD, the Special Application Center, and external partners to properly dispose of or demolish structures on AH-owned property by submitting disposition or demolition applications. Application activities included engaging in activities to execute, renew, or update ground leases and continuing to consider the acquisition of parcels under its co-investment program that may require disposition terms including a long-term ground lease to the development partnerships.
- AH evaluated activities that complement AH's goal to preserve affordable housing in the city. Activities included review of strategies that position AH to acquire properties from HomeFlex partners that desire to sell their property and no longer participate in the HomeFlex Program and consideration of activities to work closely with property owners with expiring tax credits to position AH to help owners while gaining a significant ownership role.



#### *Housing Preservation*

- AH manages substantial rehabilitation or significant modernization efforts at AH-Owned communities by collaborating with external partners and contractors to meet Rental Assistance Demonstration (RAD) Program requirements.
- Two communities with public housing units converted to project-based voucher (PBV) assistance under the RAD Program. The conversion under RAD preserves the affordability of 159 units:
  - 30 units at Columbia Village (100 total units); and
  - 129 units at James Allen Jr. Place (formerly known as Hightower Manor).
- AH actively manages and monitors the RAD Choice Mobility waiting list to ensure that RAD PBV families expressing an interest in obtaining a TBV are placed on the waiting list and have priority in the issuance of turnover vouchers<sup>10</sup> to eligible RAD PBV families.



<sup>10</sup> AH elected to use the alternative option under Choice Mobility, which caps turnover vouchers to RAD PBV at three-quarters (75%).

- AH preservation strategies also entail the review of strategies to support Low-Income Housing Tax Credit (LIHTC) applications submitted by development partners for planned projects. AH also continued activities to update AH's underwriting model to factor income averaging, "twinning"<sup>11</sup> of 4% and 9% tax credits, and other new issues/developments with 4% and 9% tax credit applications and requirements.
- AH did not encounter any opportunities to assist in the preservation of naturally affordable or expiring units outside of AH's portfolio but continues to analyze opportunities to do so.

### *Choice Neighborhoods*

- The Choice Atlanta team continued implementation of the HUD-approved Critical Community Improvements (CCI) Plan. The CCI Plan includes expending available funding sources, acquisition of properties, providing rehabilitation assistance for low-income homeowners, and increasing or contributing to place-making enhancements throughout the University Choice Neighborhood (UCN) boundaries. Place-making enhancements that improve UCN corridors may include planters, landscaping, artwork, street scape and resurfacing, decorative bus stop shelters, and other enhancements.
- The Choice Atlanta team oversees the rehabilitation efforts of Roosevelt Hall and ensures that former University Homes residents right-to-return is preserved while updating the UCN Implementation Grant Housing Plan.
- AH's Choice Heritage Program funding is provided through the Choice Neighborhoods Implementation Grant. Under this program AH issues owner-occupied rehabilitation awards<sup>12</sup> within the UCN. AH has completed 50% of its proposed owner-occupied rehabilitations and five preservation projects remain.



### *Housing Administration*

- AH **administers project-based rental assistance programs** that include public housing units and project-based vouchers (PBVs) at AH-Owned and Mixed-Income Communities:
  - Program includes 2,664 units: 1,132 directly owned and 1,532 indirectly owned;
  - Program includes 1,370 RAD PBV units previously identified as public housing units;
  - Program includes 2,746 LIHTC units located in various communities in AH's jurisdiction; and
  - Program includes 6,566 PBV units located in various communities in AH's jurisdiction.
- Inspections of subsidized units at AH-Owned and mixed-income communities are conducted under HUD's Uniform Physical Condition Standards (UPCS) guidelines. Where possible, utilization of preliminary guidelines established under the National Standards for the Physical Inspection of Real Estate (NSPIRE) Demonstration Program under the Real Estate Assessment Center (REAC) are applied. NSPIRE is designed to test inspection methods. In FY 2021, AH erroneously cited voluntary inclusion in NSPIRE, however, AH does not have any properties in the NSPIRE Demonstration Program.
- The team assembled under AH's Housing Choice Voucher Program (HCVP) works hard to issue tenant-based vouchers (TBVs) to eligible families and works harder to identify single-family and multi-family property owners that accept vouchers. AH housed 674 families of its HCV waitlist, creating 65 net new affordable units through the subsequent lease-up of issued TBVs.
- AH collaborated with Partners for Home (PFH) to improve utilization of HUD's Homeless Management Information System to better facilitate housing referrals for families experiencing homelessness.

<sup>11</sup> "Twinning" is AH's ability to combine 4% and 9% tax credits in the same project, which can allow for more tax credit equity.

<sup>12</sup> AH suspended in-person activities in response to COVID-19. AH plans to resume in-person projects pursuant to pandemic protocols.

- **AH administers tenant-based rental assistance programs** inside and outside of the City of Atlanta:
  - Program includes 11,109 tenant-based vouchers: 9,628 inside and 1,481 outside of Atlanta.
    - AH created a Single-Room Occupancy Program.
  - Program includes support of 14 HCV Homeownership families.
  - Program includes 1,559 special purpose vouchers dedicated for targeted population groups:
    - 289 households assisted with Family Unification Program (FUP) vouchers;
    - 71 households assisted with Mainstream Five (M5) vouchers;
    - 173 households assisted with Near-Elderly, Disabled (NED) vouchers;<sup>13</sup>
    - 233 households assisted with VASH vouchers;
    - 102 households assisted with EHVs; and
    - 691 households with other SPVs (see page 11 for SPV detail).
- In alignment with pandemic protocols, AH temporarily postponed the AHGreen program that focuses on training Housing Quality Standard (HQS) Inspectors on energy and utility audits to help AH-assisted households reduce their energy costs and offering green jobs training to program participants.
- AH increased efficiency by implementing a biennial inspection schedule. Future administration of this effort permits AH to “reward” “high performing” properties and units and freeing time to focus on properties and units needing more attention while assuring quality, safe, sanitary units for AH assisted families.

### Self-Sufficiency

- AH completed its third ACCESS (Achieving Connectivity to Create Equity, and Self-Sufficiency) cohort, a technology sector training program, with 29 individuals. After completion of ACCESS, AH assists graduates in job-placement in technology related positions. Further, AH continued to secure external partners in support of closing the digital divide through this program.
- AH oversaw and advanced the completion of Roosevelt Hall, a historic building, to promote economic mobility by centralizing UCN case managers and service providers that connect participants to workforce development and employment opportunities. It will also serve as a connection point to coaching and counseling, health and wellness, and aging-in-place activities.
- AH continued collaboration with community partners to administer HUD’s EnVision Program to households located in West Atlanta. Program pillars include economic empowerment, educational advancement, health and wellness, and character and leadership.
- AH strengthened its digital footprint through training and the expansion of social media platforms to ensure program participants and partners are connected and informed.
- Resident services coordinators assisted resident councils, facilitated reasonable accommodation requests, and acted as a liaison between residents and PMDs at AH-Owned Public Housing Communities. In collaboration with AH’s Facilities and Operations Management team, the resident services team coordinated safety measures at AH-Owned facilities, including:
  - Ongoing issuance of personal protective equipment and educational materials;
  - Facilitating onsite health clinics to administer COVID education, tests, and vaccinations;
  - Monitoring and maintaining contact with AH-assisted families, especially individuals with no known relatives in the immediate area; and
  - Tracking COVID-19 exposure cases at AH-Owned communities.

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<sup>13</sup> Mainstream One vouchers are “folded” into this count

- AH's Human Development Services (HDS) team directly assisted AH's TBV families, which includes management of referrals to service providers, oversight of service provider performance, designing activities that move program participants closer to economic independence and housing self-sufficiency, and assisting in youth leadership activities among HCV families.
  - Through referrals, the HDS team assisted HCV families in meeting AH's Work/Program Compliance requirements by providing employment related supportive services, including local and metro employment referrals, ongoing support, and job coaching to navigate job-related challenges; HDS further assisted residents with improving soft skills, training, and employment preparation or training.
  - HDS coordinated life skills training and support groups that generate referrals for partner agencies, such as Mercy Care, Fulton County Board of Health, and youth services providers.
  - AH reviewed referral-based management and performance outcomes by service providers
  - to ensure AH offers the best programs to HCV families.
  - AH considered opportunities to assist non-HCV families with learning opportunities through workshops, after-school programming, and summer camps for children in AH-assisted households as funding and space permits.
- Designated service coordinators served decentralized households residing in Mixed communities. These coordinators do not provide core services, but general assistance to assisted HomeFlex families.
- Through service agreements, AH served households residing in supportive housing communities within AH's service jurisdiction. HAVEN service agreements are designed to provide services based on the unique need of vulnerable populations.

### Youth Achievement

- AH provided or facilitated scholarship opportunities for 14 AH-assisted youths bound for college, totaling \$72,000.
- AH provided 17 AH-assisted youths with employment and mentorship for rising high school seniors, recent high school graduates, and new college students in professional development through AH's Summer Internship Program.



### Administration

- AH pursued federal, philanthropic, and state opportunities to secure bond funds, grant awards, tax credits, and other assistance to cost effectively incentivize working families with children while increasing housing choices through creation and preservation efforts consistent with AH goals.
- AH began incorporating AHGreen recommendations in the scope of new construction requests to meet environmental sustainability goals. AH also evaluated whether to include AHGreen requirements in substantial rehabilitation and significant modernization contracts.
- AH coordinated activities that increase contractual compliance and operations to reduce costs as well as support AH's diversity efforts in contracting and human resources practices. Efforts included recruitment from AH's assisted population; increasing outreach efforts to Atlanta's Hispanic and Latino populations; and recognizing companies that employ a workforce meeting Section 3 definitions.
- AH monitored Section 3 protocols to ensure proper implementation and enforcement.
- AH deployed COVID-19 Waivers, as extended by HUD and that AH may elect to use in lieu of or in addition to MTW Waivers approved by HUD.

## C. Long-Term MTW Goals and Objectives

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

### Housing

#### *Housing Development & Creation*

- AH continued to explore the feasibility of pursuing a modular housing initiative and associated construction methods and techniques under its **Revitalization Program**. This initiative is consistent with AH's development strategy to create more affordable housing units and may include the creation of a long-term investment vehicle to develop affordable residential communities. Furthermore, this initiative may include manufacturing homes, selling lots, and servicing mortgages.
- AH explored development strategies to create amenity-rich communities under its **Revitalization Program**, which enables AH to create more affordable housing units with access to amenities while revitalizing communities through commercial ventures.
- AH further analyzed the issuance of short-term construction loans or similar funding products under AH's **Gap Financing** MTW Activity, while continuing to collaborate with various agencies, organizations, or developers to innovate or advance public-private development projects. Initiatives continue to align with AH's development strategy to create more affordable housing units.
- AH collected information to support an AH specific **Total Development Cost (TDC) Schedule** that more closely aligns with local urban development factors to permit AH to contribute to development projects at a higher level.
- AH monitored the local real estate market to ensure the **Comprehensive Homeownership Program** has long-term sustainability for the agency, while creating new homeownership opportunities for low-income Atlantans.

#### *Homelessness Prevention*

- AH monitored local housing demand of specific population groups for its **Develop Alternate and Supportive Housing Resources** MTW Activity that provides housing stability for identified households in need.
- AH continued to monitor investments in local non-profits and evaluated the performance of services to referred individuals and households by tracking attendance and outcomes. AH analyzed supportive housing activities to evaluate investments in local non-profits and performance of services to referred individuals and households and the outcome of provided services.

### Self-Sufficiency

- AH continued a performance review of its **Work/Program Requirement** to determine the program's effect on participants. Monitored metrics include household earned income changes, the per unit costs (subsidy share) or rent-roll (tenant share) changes, program compliance rates, and household counts, and job stabilization.
- AH researched incentives to increase resident employment and wage earnings. Potential incentives analyzed include assistance for training-related expenses, education, and employment. Incentive concepts may include disregard of child support income, childcare and transportation assistance, GED testing reimbursement, purchase of work uniforms and tools, and other incentives to create a culture of learning and stable employment among assisted households.

- AH evaluated the performance and success of MTW Activities to ensure alignment between AH vision and the needs and interests of residents. AH may modify an existing MTW Activity or introduce a new one to extend program participation for AH-assisted households that graduate from AH “job-trainings”. The intent of such activity would be to ensure stability before phasing out assistance.
- AH evaluated incentives and “rewards” for working families with children. Potential incentives being analyzed include:
  - Disregarding child support income or other unearned income from the rent calculation formula.
  - Use of fixed calculation percentage (less than 30%) or creation of a tiered rent schedule to help stabilize families.
  - Evaluate opportunities to increase housing choices including the increase of the rent burden from 30% to 40% (not to exceed 50%) to allow program participants to elect to contribute a larger amount towards their rent to increase housing choices.



## Administration

- AH continued to evaluate potentially obsolete MTW Activities resulting from changes in strategic priorities or HUD guidance. Obsolete activities would also include underperforming activities or **activities that do not benefit assisted families, AH, or the community**.
- AH supported the extension of the MTW Program beyond 2028 and HUD expansion efforts.
- AH evaluated whether to deploy MTW Authorizations to modify the **Utility Allowance (UA) Schedules** to serve participants and AH more efficiently and effectively.
- AH hopes to identify opportunities for improvement in the following areas:
  - Reduction of AH’s per unit cost.
  - Elimination or reduction of utility reimbursement payments (URPs).
  - Elimination or reduction of zero-income families or negative rent scenarios.

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

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

### Housing

#### *Housing Development*

- In FY 2022, AH continued to advance development and redevelopment projects through various stages of construction. AH made further progress on planned development and redevelopment projects on AH-owned property including:
  - Redevelopment of Bowen Homes. AH initiated plans to pursue a Choice Neighborhoods Implementation Grant that will build off the Choice Neighborhoods Planning Grant award.
    - AH issued a development Request for Proposal (RFP) in anticipation of a grant award.
  - Redevelopment of the Civic Center, which will require significant public private partnerships.
    - AH issued a development RFP to capitalize on collaborative efforts to develop this project.
  - Development of Englewood Manor IA and IB (South), a 200-unit multi-family rental project and a 160-unit senior property.
    - AH development teams are actively seeking financing for these projects. The teams plan to leverage AH capital funding and HomeFlex subsidy with Low-Income Housing Tax Credit (LIHTC) equity, private debt, and Tax Allocation District (TAD) funding.
  - Development of Englewood Manor (North) that involves a land swap with the City of Atlanta.
    - AH development teams are actively seeking financing for this project.
- In FY 2022, AH continued its collaborative co-investment program to create local, non-traditional (LNT) housing opportunities for low-income families. Planned projects will meet requirements under Notice PIH 2011-45.
  - AH advanced various deals in FY 2022 that will ultimately close or be under construction in FY 2023.
  - Projected FY 2023 Financial Closings:
    - Financially closing Heritage Village at West Lake (239 Westlake Avenue, NW) project, a 100% affordable co-investment project expected to deliver 102 affordable units.
    - Financially closing Sylvan Hills II project, a co-investment project with Invest Atlanta that is expected to deliver 87 affordable units.
    - Financially closing on Westside Square project, a co-investment project with Invest Atlanta that is expected to deliver 44 affordable units.
    - Financially closing Englewood Manor IA (South), a multi-family rental project that is expected to deliver 200-units.
    - Financially closing Englewood Manor IB (South), a rental project that is expected to deliver 160-units for elderly residents.
  - FY 2023 Development Phase Projects
    - Advancing construction on Juanita Gardner Village project, which is projected to deliver 108 affordable units. This is a 100% affordable co-investment project.
    - Advancing construction on Flats at Stone Hogan project, which is projected to deliver 256 affordable units. This is an affordable co-investment project with Invest Atlanta.
    - Advancing construction on Phoenix Ridge project, which is projected to deliver 396 affordable units. This is an affordable co-investment project with Invest Atlanta.
    - Advancing construction on Villas at Stone Hogan project, which is projected to deliver 190 affordable units. This is an affordable co-investment project with Invest Atlanta.
- AH advanced its Homeownership Initiative Plan at various AH-owned sites, including Englewood, Mechanicsville, Herndon, Scholar's Landing, Magnolia Perimeter, and West Highlands.

- AH reviewed and revised AH's conversion schedule for the remaining public housing communities under the RAD Program. This includes supportive project management functions involving the conversion of public housing units to project-based voucher units.
- AH assessed the feasibility of activating a new Annual Contributions Contract for Public Housing (ACC/PH) units under HUD's Faircloth Limits. AH can add up to 9,136 units<sup>14</sup>.
- AH prepared to finish the UCN transformational plans and efforts.
- AH also began building internal capacity to administer self-development and self-financing strategies that achieve AH affordable unit goals and objectives.

### **Housing Administration**

- AH incorporated green development criteria and standards into new development plans by increasing the percentage of new AH units that achieve green certification, and by promoting or installing green infrastructure within new development.
- AH made strategic investments to support community-serving facilities and in projects that enhance public safety and quality of life efforts. AH sought new sources of funding and partners to support neighborhood revitalization. AH designed an incentive program based on data and research that promotes a culture of work and education throughout AH-assisted communities.
- AH investigated and implemented, internet access opportunities and implemented supportive services, life-long learning, and continued community engagement planning at Roosevelt Hall.
- AH increased the number and frequency of training opportunities with property-manager developers (PMDs) and other housing partners on MTW policies.

### **ADMINISTRATION**

- AH advanced its AHGreen initiative, which aims to reduce utility costs, improve energy efficiency, and introduce AH-assisted households to green sector jobs. AH monitored investments in local non-profits to ensure program performance, and to measure the success of programs designed to assist AH participants.
- AH evaluated data collection methods to ensure the accurate measurement of the performance of MTW activities as AH continues to focus on creating opportunities for AH-assisted households. Assessments included the evaluation of software, establishing metrics, and analyzing data.
- AH researched efforts to increase sources of funding and revenue-generating opportunities, including the leasing of vacant parcels and air space for community events and communication towers.

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<sup>14</sup> As of September 30, 2021.

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## 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
Columbia Village	0	30	Leased/Issued	Yes	PH units converted to PBV units under the RAD Program
Cosby Spear Highrise	282	0	Committed	Yes	PH units converted to PBV units under the RAD Program.
East Lake Highrise	149	0	Committed	Yes	PH units converted to PBV units under the RAD Program.
James Allen Jr. Place (formerly Hightower Manor)	0	129	Leased/Issued	Yes	PH units converted to PBV units under the RAD Program
<b>Total:</b> Planned or Actual Newly Project-Based	<b>431</b>	<b>159</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:

The difference between the Planned and Actual number of vouchers newly project-based is 272, which AH attributes to planned RAD FY 2021 conversions that "rolled forward" because of approval delays resulting from pandemic protocols. Further, the approval delays caused planned FY 2022 conversions to "roll forward" into FY 2023. These properties may appear in the FY 2023 MTW Annual Plan based on the revised closing date.

**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
395 James P. Brawley Drive	20	20	Leased/Issued	No	PBV unit creation under AH's Standard HomeFlex Program.
507 English Avenue	6	6	Leased/Issued	No	PBV unit creation under AH's Standard HomeFlex Program.
Academy Lofts at Adair Park	5	5	Leased/Issued	No	PBV unit creation under AH's Standard HomeFlex Program.
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	54	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)
Avalon Ridge Family	89	89	Leased/Issued	No	PBV unit creation under AH's Standard HomeFlex Program
Brightstone at DeKalb Medical Parkway	175	175	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
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
Capitol View	43	43	Leased/Issued	No	PBV unit creation under AH's Standard HomeFlex Program.
Capitol View	24	24	Leased/Issued	No	PBV unit creation under AH's HomeFlex Supportive Housing (HAVEN) 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	48	48	Leased/Issued	Yes	PH unit conversion in Mixed Community to PBV units under RAD Program
Columbia Estates	50	50	Leased/Issued	Yes	PH unit conversion in Mixed Community to PBV units under RAD Program
Columbia Grove	56	56	Leased/Issued	Yes	PH units 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	62	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

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 Mechanicsville Parkside Apartments VI	47	47	Leased/Issued	Yes	PH unit conversion in Mixed Community to PBV units under RAD Program
Columbia Park Citi Residences at West Highlands	61	61	Leased/Issued	Yes	PH unit conversion in Mixed Community to PBV units under RAD Program
Columbia Senior Residences at Blackshear	78	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	54	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	37	37	Leased/Issued	No	PBV unit creation under AH's HomeFlex Supportive Housing Program (HAVEN)
Columbia Sylvan Hills	39	39	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 HomeFlex Supportive Housing Program (HAVEN)
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
Covenant House Georgia	30	30	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
Dwell at Alcove	9	9	Leased/Issued	No	PBV unit creation under AH's HomeFlex Supportive Housing Program (HAVEN)
Gateway at Capitol View	162	162	Leased/Issued	No	PBV unit creation under AH's Standard HomeFlex Older Persons Program
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	97	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	199	199	Leased/Issued	No	PBV unit creation under AH's Standard HomeFlex Program
Legacy at Vine City	105	105	Leased/Issued	No	PBV unit creation under AH's Standard HomeFlex Program
Lillie R. Campbell House	64	64	Leased/Issued	No	PBV unit creation under AH's Standard HomeFlex Program
London Townhomes	94	94	Leased/Issued	No	PBV unit creation under AH's Standard HomeFlex Program.
Manor at Indian Creek II	75	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	129	129	Leased/Issued	Yes	PH unit conversion in AH-Owned Community to PBV units under RAD Program
Martin House at Adamsville	113	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

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS (Planned*)	NUMBER OF PROJECT-BASED VOUCHERS (Actual)	STATUS AT END OF PLAN YEAR**	RAD ?	DESCRIPTION OF PROJECT
Oasis at Scholars Landing	60	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)
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	196	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	207	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	24	24	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
Sterling at Candler Village	170	170	Leased/Issued	No	PBV unit creation under AH's Standard HomeFlex Program
Summerdale Commons	50	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
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	271	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)

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS (Planned*)	NUMBER OF PROJECT-BASED VOUCHERS (Actual)	STATUS AT END OF PLAN YEAR**	RAD ?	DESCRIPTION OF PROJECT
Woodbridge at Parkway Village	98	98	Leased/Issued	No	PBV unit creation under AH's Standard HomeFlex Program
<b>Total:</b> Planned and Actual Existing Project-Based	<b>7,981</b>	<b>7,981</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:**

N/A

**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
AH continued to hold units at its remaining communities off-line to start, advance, or complete substantial rehabilitation and significant modernization to units directly associated with its conversion plans to meet the requirements of the Rental Assistance Demonstration (RAD) Program.

#### 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 expended approximately \$1.53M for site and building improvements at seven AH-Owned communities. Actual expenditures included repair, replacement, and upgrade projects in common areas, as well as individual units of the structure. Some projects spanned across multiple properties and some projects were specific to an individual property.

Multiple site projects included upgrading callboxes, replacing 40 Packaged Terminal Air Conditioner (PTAC) units, replacing vehicle entry gates, replacing security cameras and DVR, replacing smoke detectors, replacing 50 toilet tanks and universal handles, and water filter replacement.

Individual site projects included assessing 285 balcony handrails and balcony structural design, replacing 100 blinds, replacing unit doors, conducting due diligence review, replacing elevator door, changing exterior and interior LED lights, repairing/replacing fitness equipment, making foundation repair, replacing garbage disposal/ice maker/dishwasher unit, repairing gazebo and soffit, upgrading generator, replacing 150 kitchen filters, upgrading LED nurse call panel, repairing and painting 63+10 lineal feet of curb, changing 84 photocell stairwell lights to LED lights, replacing salvaged boiler, repairing sprinkler system, and replacement of window seals.

AH may have replaced aging vehicles or equipment, such as buying furniture, fixtures, and other equipment, consistent with AH's established priorities during the fiscal year. Listed below are the capital expenditure amounts by property:

- \$ 380,065 @ Cheshire Bridge Road Highrise
  - \$ 205,498 @ Cosby Spear Highrise
  - \$ 74,697 @ East Lake Highrise
  - \$ 83,550 @ Georgia Avenue Highrise
  - \$ 534,080 @ Marian Road Highrise
  - \$ 116,141 @ Martin Street Plaza
  - \$ 139,551 @ Westminster
- \$1,533,582 Actual Capital Expenditure Total**

## 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	15,204	31,968	1,267	2,664
MTW Housing Choice Vouchers (HCV) Utilized	244,404	228,708	20,367	19,059
Local, Non-Traditional: Tenant-Based	3,000	3,240	250	270
Local, Non-Traditional: Property-Based	32,052	32,952	2,671	2,746
Local, Non-Traditional: Homeownership	19,620	22,560	1,635	1,880
<b>Planned and Actual Totals:</b>	<b>314,280</b>	<b>319,428</b>	<b>26,190</b>	<b>26,619</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:

<p>AH attributes the differences between the planned and actual households served to the following factors:</p> <ul style="list-style-type: none"> <li>• Conversion of PH units to long-term Section 8 assisted PBV units;</li> <li>• Lower than expected number of property owner partners signing a HAP Contract before July 1, 2022; and</li> <li>• Reduction in HCV Homeownership households through attrition (AH is moving away from this program because of limited success).</li> <li>• AH has shifted its focus towards its more successful Down Payment Assistance Program. AH may revisit the HCV Homeownership Program later.</li> </ul>
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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	3,240	250	270
Property-Based	Gap Financing/RE.2005.11	13,020	12,936	1,085	1,078
Property-Based	Gap Financing/RE.2005.11	19,032	20,016	1,586	1,668

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	19,620	22,572	1,635	1,880
<b>Planned and Actual Totals</b>		<b>54,672</b>	<b>58,764</b>	<b>4,556</b>	<b>4,896</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 to complete planned rehabilitation projects and dealt with leasing issues connected to the nationwide eviction moratorium, which extended into a portion of FY 2022. The COVID-19 pandemic limited property management activities, including lease-ups and evictions for a portion of FY 2022.</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 2022, 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.	23,335	Closed	No
Choice Mobility Vouchers Program	Specific voucher WL for eligible residents living at converted PH sites.	0	Partially Open	Yes
MTW Public Housing Program	Community-wide WL for all populations managed by a third party at the property level for 1,073 units at 7 AH-Owned sites.	1,315	Partially Open	Yes
Site-Based Administration – HomeFlex and Mixed Communities	Community-wide WL for all populations managed by property owners at the property level for 2,879 units at 38 sites.	13,003	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 6,843 units at 71 sites.	33,507	Closed	No

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

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

**ii. 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 did not make any changes to this waiting list during FY 2022
RAD Project-Based Voucher (Choice Mobility)	AH did not make any changes to this waiting list during FY 2022.
Site-Based – Assorted Properties	No changes: 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	13
49%-30% Area Median Income	148
Below 30% Area Median Income	330
<b>Total Local, Non-Traditional Households Admitted</b>	<b>491</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%	10,401	49%	13%
<b>2 Person</b>	18%	4,342	21%	3%
<b>3 Person</b>	18%	2,850	13%	-5%
<b>4 Person</b>	14%	1,846	9%	-5%
<b>5 Person</b>	14%	970	5%	-9%
<b>6+ Person</b>	0%	735	3%	3%
<b>TOTAL</b>	<b>100%</b>	<b>21,144</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 any variances of more than 5% between the Plan Year and Baseline Year shown above primarily to past methodology, where HUD approved AH to use bedroom sizes to establish the households served baseline and subsequent household served counts because AH was initially unable to collect family size counts due to existing agreements with the private property managers of its public housing communities.

Although AH has since collected and reported actual family sizes, AH acknowledges that the alternate methodology, using bedroom sizes for the baseline, does establish an inaccurate representation of AH households served, but it does include reasonable assumptions and projections. Therefore, AH will continue to show an annual variance because the alternate methodology "blends" two data sources.

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 contribute to the 9% change under this category. Further, a ripple effect in the described activities, as well as an increase of available units, may also contribute to household size changes.

**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	958	Elderly and Non-Elderly Disabled persons with earned income
	0	<i>(Households Duplicated Across MTW Activities)</i>
	958	<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.

### 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	42	Section I.O: General Conditions; setting rents and term limits
AW	2005.02	Earned Income Disregard	43	Sections I.O and VII.A.4: General Conditions and . . . Authorized to Create its own HCV Program
AW	2005.03	Work / Program Requirement	44	Section I.O: General Conditions Section IV: Self-Sufficiency/Supportive Services
HC	2005.04	Enhanced Inspection Standards	45	Section VII: Establishment of HCV Program
HD	2005.05	Good Neighbor Program II	47	Section IV: Self-Sufficiency/Supportive Services Section V: Single-Fund Budget with Full Flexibility
HD	2005.06	Human Development Services	48	Section IV: Self-Sufficiency/Supportive Services Section V: Single-Fund Budget with Full Flexibility
PH	2005.07	4-to-1 Elderly Admissions	49	Section III: Occupancy Policies Section IV: Self-Sufficiency/Supportive Services
SH	2005.09	Develop Alternate and Supportive Housing Resources	50	Section V: Single-Fund Budget with Full Flexibility Section VII.B: Simplification of the Process to Project-Base Section 8 Vouchers Section VII.C: Simplification of the Development and Redevelopment Process
RE	2005.10	Revitalization Program	52	Section V: Single-Fund Budget with Full Flexibility Section VII.B: Simplification of the Process to Project-Base Section 8 Vouchers Section VII.C: Simplification of the Development and Redevelopment Process

<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

## 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 non-elderly disabled adult 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 communities offered under public-private partnerships. Management agents at those sites are responsible for implementing AH housing policies. AH conducts periodic site visits and consults with management representatives, as well as requests and reviews management reports for compliance while offering training opportunities with respect to property operations, compliance, and financial oversight.

<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 = 1,055	Actual Households Paying <i>Only</i> the Minimum Rent = 1,236	
	Total <b>Annual Agency Rental Revenue</b> prior to implementation of the activity: \$ 681,600	Expected <b>Annual Agency Rental Revenue</b> after implementation of the activity: \$ 1,582,500	Actual <b>Annual Agency Rental Revenue</b> after implementation of the activity: \$ 1,854,000	

### 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

This activity did not have any challenges.

## 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 and non-elderly disabled 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 or non-elderly disabled adults.

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 Benefits, and similar fixed 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: <b>Non-Elderly Disabled (NED) and Elderly Households (HHs) Reporting Earned Income</b> (increase).	Number of Non-Elderly Disabled (NED) Households = Unk	Expected number of NED HHs = 226	Actual number of NED HHs = 475	<b>Exceeds Benchmark</b>
	Number of Elderly HHs = Unk	Expected number of Elderly HHs = 155	Actual number of Elderly HHs = 483	
	Total <b>Number of NED and Elderly Households with Earned Income</b> prior to implementation of the activity is:  <b>Unk</b>	Expected <b>Number of NED and Elderly Households with Earned Income</b> after implementation of the activity is:  <b>381</b>	Actual <b>Number of NED and Elderly Households with Earned Income</b> after implementation of the activity is:  <b>958</b>	

### 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**

This activity did not have any challenges.

**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 work-able definition by age but are unable to meet the education or employment requirement because of a disability, must be verified.

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 households to community resources that link them to education, employment, training, and related services to help individuals become compliant.

AH realizes that many program participants work in the Service Industry, such as food and beverage, hospitality, personal care, and retail jobs. These jobs usually base staffing on algorithms that factor in prior year data along with the season, which are used by employers to plan current schedules. Based on this realization, 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.

<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>
	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.
Total Households Meeting or Maintaining Program Compliance including Households Assisted by AH's Human Development Services (HDS) Team	Target or workforce households (18-61 years old) = Unk	Expected Target Households = 8,259	Actual Target Households = 8,408	<b>Exceeds Benchmark</b>
	Households reporting employment = Unk	Expected households reporting employment = 5,368	Actual households reporting employment = 6,030	
	<b>Total Percent of Target or Workforce Households meeting Work/Program Requirement</b> prior to implementation of the activity is:  <b>0%</b>	<b>Expected Percent of Target or Workforce Households meeting Work/Program Requirement</b> after implementation of the activity is:  <b>65%</b>	<b>Actual Percent of Target or Workforce Households meeting Work/Program Requirement</b> after implementation of the activity is:  <b>72%</b>	
<i>Weighted Compliance Rate</i>	<i>N/A</i>	<i>65%</i>	<i>76%</i>	

**iii. Actual Non-Significant Changes**

AH continues to monitor employment practices and compliant families to ensure alignment of the required hours of employment and 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**

This activity did not have any challenges.

**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 inspection 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, multiplexes (2 to 4 units), 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.

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 Enhanced Inspection Policy (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.
	Total number of quality Housing Choice Voucher (HCV) units = Unk	Expected number of quality HCV units = 9,361	Actual number of quality HCV units = 9,628	<b>Exceeds Benchmark</b>
	Percent of quality Housing Choice Voucher (HCV) units inspected = Unk	Expected percent of quality HCV units inspected = 98%	Actual percent of quality HCV units inspected = 96%	
	<b>Total Number of Quality Subsidized Units for Households ≤80% AMI</b> prior to implementation of the activity is:  <b>N/A</b>	<b>Expected Number of Quality Subsidized Units for Households ≤80% AMI</b> after implementation of the activity is:  <b>9,174</b>	<b>Actual Number of Quality Subsidized Units for Households ≤80% AMI</b> after implementation of the activity is:  <b>9,243</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 has worked work diligently to dispel rumors and myths about voucher holding families in its outreach efforts to attract new property owners and retain existing ones 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) II has evolved its curriculum to include training on the roles and responsibilities of being a good neighbor once families become program participants. 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 - Good Neighbor Program II</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
	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 Housing Choice Voucher (HCV) Program Admissions Completing Good Neighbor Program (GNP) Services through Martin Luther King Sr. Community Resources Collaborative (MLKSCRC)	Total number of new HCV Program admissions referred for GNP services = 0	Expected number of new HCV Program admissions referred for GNP services = 1,260	Actual number of new HCV Program admissions referred for GNP services = 674	<b>Benchmark Not Achieved</b>
	Percent of new HCV Program admissions completing GNP services = 100%	Expected percent of new HCV Program admissions completing GNP services = 100%	Actual percent of new HCV Program admissions completing GNP services = 96%	
	Total <b>Number of New HCV Households Completing GNP Services</b> prior to implementation of the activity is: <b>0</b>	Expected <b>Number of New HCV Households Completing GNP Services</b> after implementation of the activity is: <b>1,260</b>	Actual <b>Number of New HCV Households Completing GNP Services</b> after implementation of the activity is: <b>648</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**

A portion of the fiscal year was affected by pandemic protocols, which influenced program admissions and terminations. Therefore, AH did not have as many admissions and subsequent referrals expected. AH anticipates resuming to normal admission processes as pandemic protocols end.

**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 - Human Development Services</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Total Housing Choice Voucher (HCV) Program Households Receiving Services through the Human Development Services (HDS) Program (AH's Family Self-Sufficiency (FSS) Program)	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 HCV Program household (HH) count = Unk	Expected HCV Program HH count = 9,173	Actual HCV Program HH count = 9,628	<b>Benchmark Not Achieved</b>
	Percent of HCV Program HHs enrolled in HDS Program = 0%	Expected percent of HCV Program HHs enrolled in HDS Program = 2.75%	Actual percent of HCV Program HHs enrolled in HDS Program = 2.1%	
	Total <b>Number of HCV Program HHs Enrolled in HDS Program</b> prior to implementation of the activity is:  <b>NR</b>	Expected <b>Number of HCV Program HHs Enrolled in HDS Program</b> after implementation of the activity is:  <b>252</b>	Actual <b>Number of HCV Program HHs Enrolled in HDS Program</b> after implementation of the activity is:  <b>201</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**

For a portion of FY 2022, pandemic protocols limited the participation in this voluntary program. AH has resumed in-person appointments and anticipates improved outcomes during FY 2023.

**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 adults 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 defined 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 accessible to all residents, regardless of age or ability, to engage in and improve the aging process.

<b>HC #4: Displacement Prevention - 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 (NED) Program Admission at AH-Owned Communities	Number of new elderly admissions at AH-Owned Units = Unk	Expected number of new elderly admissions to AH-Owned Units = 63	Actual new elderly admissions to AH-Owned Units = 97	<b>Exceeds Benchmark</b>
	Number of new NED admissions at AH-Owned Units = Unk	Expected number of new NED admissions at AH-Owned Units = 213	Actual new NED admissions to AH-Owned Units = 0	
	Total Admissions Ratio of <b>New Elderly-to-New NED Households (HHs) at AH-Owned Units</b> prior to implementation of the activity is:  <b>NR</b>	Expected Admissions Ratio of <b>New Elderly-to-New NED HHs at AH-Owned Units</b> after implementation of the activity is:  <b>0 to 1</b>	Actual Admissions Ratio of <b>New Elderly-to-New NED HHs at AH-Owned Units</b> after implementation of the activity is:  <b>8 to 0</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**

This activity did not have any challenges.

**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 help 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, particularly those with mental disabilities inappropriately housed in AH-Owned communities, which lack on-site supportive services to meet residents' unique needs.

The last change in this activity merged Developing Alternative Housing Resources and Developing Supportive Housing into this current activity, where the original concept and focus remains intact, which are homeless assistance programs and supportive services, non-targeted, or mainstream programs. This activity supports Home Again, AH's short-term housing assistance and other tenant-based and project-based assistance programs designed to help families avoid homelessness or combat chronic or extended periods of homelessness.

<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 Supportive Housing Units Made Available for Households (HHs) at or below 80% AMI as a result of the activity (increase). Specific HHs Include Non-Elderly Disabled and Veterans.	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.
	Total new supportive housing units created under HAVEN = 0 Units created under AH's Special Programs Vouchers: COVID Rapid Support Housing Program (CRSHP) = 0 FLOW = 0 GA Housing Voucher Program (HVP) = 0 Housing First = 0 Integrated Care Permanent Supportive Housing (ICPSH) = 0 RISE II = 0 Special Program Housing Vouchers, a.k.a. Atlanta Public Schools (APS) Voucher = 0	Expected new supportive housing units created under HAVEN = 145 Expected units created under AH's Special Programs Vouchers: CRSHP = 90 FLOW = 473 GAHVP = 23 Housing First = 68 ICPSH = 29 RISE II = 19 APS Voucher = 57	Actual new supportive housing units created under HAVEN = 29 Actual units created under AH's Special Programs Vouchers: CRSHP = 88 FLOW = 391 GAHVP = 25 Housing First = 75 ICPSH = 29 RISE II = 18 APS Voucher = 65	<b>Benchmark Not Achieved</b>
	Total <b>Number of New Supportive Housing Units Made Available for HHs at or Below 80% AMI</b> prior to implementation of the activity is:  <b>0</b>	Expected <b>Number of New Supportive Housing Units Made Available for HHs at or Below 80% AMI</b> after implementation of the activity is:  <b>904</b>	Actual <b>Number of New Supportive Housing Units Made Available for HHs at or Below 80% AMI</b> after implementation of the activity is:  <b>720</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**

For a portion of FY 2022, pandemic protocols caused some approval delays and impacted contractual timing in this program. AH has resumed in-person appointments and anticipates improved metric outcomes during FY 2023.

## 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 III.A.3 Occupancy Policies – General Occupancy Policies, V.A.2.b Funding Issues Single-Fund budget with Full Flexibility, and Attachment G – Good Cause Justification, as well as 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.

Although AH’s primary focus has been on repositioning its public housing portfolio and adding affordable units to the housing stock, AH maintains a strong interest in becoming a catalyst for community revitalization by generating 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. AH’s commercial facilities are consistent with the objectives and ideas proposed in past plans, which 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 (HHs) 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>
	Additional housing units added by revitalization projects = Unk	Expected additional housing units added by revitalization projects = 1,402	Actual additional housing units added by revitalization projects = 0	
	Percent of affordable housing units included in revitalization projects = Unk	Expected percent of affordable housing units included in revitalization projects = 50%	Actual percent of affordable housing units included in revitalization projects = 0%	
	<b>Total Number of Affordable New Housing Units</b> for HHs at or Below 80% AMI prior to implementation of the activity is:	<b>Expected Number of Affordable New Housing Units</b> for HHs at or Below 80% AMI after implementation of the activity is:	<b>Actual Number of Affordable New Housing Units</b> for HHs at or Below 80% AMI after implementation of the activity is:	
	<b>2,720</b>	<b>701</b>	<b>0</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**

Continued construction cost increases, supply chain issues, and staffing shortages 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. AH is refining its Real Estate forecast to predict the timing of financial closings wither greater accuracy.

## **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 adding affordable units to the housing stock and 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, AH would miss location and other opportunities, or be faced with delays and extended timelines that both contribute to increased costs. These actions are contradictory to spending federal dollars effectively and efficiently and limits AH's ability to increase housing choices for targeted 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 - Gap Financing</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 co-investment projects achieving a financial closing = Unk	Expected number of co-investment projects achieving a financial closing = 4	Actual number of co-investment projects achieving a financial closing = 2	<b>Benchmark Not Achieved</b>
	Total number of additional housing units by co-investment projects = Unk	Expected number of additional housing units by co-investment projects = 802	Actual number of additional housing units by co-investment projects = 224	
	Percent of affordable housing units included in co-investment projects = Unk	Expected percent of affordable housing units included in co-investment projects = 50%	Actual percent of affordable housing units included in co-investment projects = 100%	
	<b>Total Number of Affordable New Housing Units</b> for households at or Below 80% AMI prior to implementation of the activity is:  <b>2,720</b>	<b>Expected Number of Affordable New Housing Units</b> for households at or Below 80% AMI after implementation of the activity is:  <b>401</b>	<b>Actual Number of Affordable New Housing Units</b> for households at or Below 80% AMI after implementation of the activity is:  <b>224</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 primary issues preventing achievement of the benchmark include planned financial closings that experienced delayed approvals until FY 2023. AH is refining its Real Estate forecast to predict the timing of financial closings wither greater accuracy.

**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.

In FY 2022, AH updated its submarket payment standards based on market studies that expanded the schedules to 24 submarkets. These new payment standards and submarket additions build reflect changes in Atlanta’s real estate market since 2016 and 2007 before that, when activity originally identified seven submarkets within AH’s service jurisdiction.

AH consulted with an independent entity to develop its own Payment Standards and implemented separate payment standard schedules for each identified submarket upon the establishment of new Housing Assistance Payment (HAP) contracts during the recertification period.

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 - 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 (by Census Tract [CT]) 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	Expected number of HCV Program families = 9,132	Actual number of HCV Program families = 9,628	<b>Exceeds Benchmark</b>
	Percent of HCV families choosing a low-poverty or area of opportunity = Unk	Expected percent of HCV families choosing a low-poverty or area of opportunity = 20.1%	Actual percent of HCV families choosing a low-poverty or area of opportunity = 21.2%	
	Total number of HCV Families Choosing a Low-Poverty or Area of Opportunity (by CT) prior to implementation of the activity is: <b>Unk</b>	Expected number of HCV Families Choosing a Low-Poverty or Area of Opportunity (by CT) after implementation of the activity is: <b>1,940</b>	Actual number of HCV Families Choosing a Low-Poverty or Area of Opportunity (by CT) after implementation of the activity is: <b>2,044</b>	

**iii. Actual Non-Significant Changes**

AH updated the submarket payment standards 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**

This activity did not have any challenges.

**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**

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.

Since activity implementation, HomeFlex 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.

Initially, AH introduced 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, 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. AH has since merged the homeless portion of the activity under RE.2007.04 – HomeFlex as a Strategic Tool.

<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 9 <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.
	Average monthly Housing Choice Voucher (HCV) subsidy payment = Unk	Average monthly HCV subsidy payment = \$771	Average monthly HCV subsidy payment = \$848	<b>Exceeds Benchmark</b>
	Average monthly HomeFlex (HFX) subsidy payment = Unk	Average monthly HFX subsidy payment = \$588	Average monthly HFX subsidy payment = \$607	
	<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>\$183/household</b>	<b>Actual Section 8 Subsidy Savings with HomeFlex Compared to Conventional Housing Choice</b> after implementation of the activity is  <b>\$241/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**

This activity did not have any challenges.

## 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: Establishment of HCV Program – AHA is authorized to create its own 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 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 can 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 9 <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	Expected number of TBV families = 9,173	Actual number of TBV families = 11,109	<b>Exceeds Benchmark</b>
	HCV overhead total = \$12,000,000	Expected HCV overhead total = \$7,987,722	Actual HCV overhead total = \$8,051,711	
	<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>\$871</b>	Actual <b>Average Monthly Subsidy per Atlanta TBV Household</b> affected by this policy after implementation of the activity is  <b>\$725</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 can develop its own rent reasonableness determination for properties owned directly and indirectly by AH.

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

In FY 2022, AH updated its submarket payment standards, and did so in FY 2016. These rents are subject to rent reasonableness determinations; however, AH expects the cumulative effects of our payment standards to increase our per unit cost (PUC), but AH does not expect HAP payments to reach the maximum rent under the new payment standards. Because of its insight regarding rents in the Atlanta market and its real estate expertise, AH may continue utilization of third-party independent market analyses.

**iii. Actual Non-Significant Changes**

AH updated its payment standards in FY 2022, however, 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**

Rapidly escalating market rents make increases to rent structures an essential strategy for retaining and recruiting landlords to house AH-assisted families. AH continues to review possible strategies to lower per unit cost in the delivery of the Housing Choice Voucher Program, but current market conditions may that difficult.

## 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 Homeownership 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 loan 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 monthly mortgage payment assistance to qualified, AH-assisted program participants purchasing a home under the terms of the HCV Homeownership Program. AH suspended this homeownership program (circa 2009), primarily because AH was unable to get solid lender participation in this program. During its active period, AH assisted 88 voucher participants in becoming homeowners under the HCV Homeownership Program and continues to provide monthly support under the original terms to the last 14 families.

As developed, AH provides a one-time Down Payment Assistance (DPA) award to eligible, first-time homebuyers after satisfactory completion of its homeownership curriculum under its Homeownership Program. The program works with HUD-approved Home Buyer Education Counseling Providers to prepare low-to-moderate-income families to become successful and sustainable homeowners. By limiting assistance to a one-time dollar amount that can be used with other down payment assistance programs, AH's DPA homeownership program maximizes the number of families AH can help, including low-income families beyond program participants.

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 refers prospective homebuyers to its Homeownership Program developed under this activity.

<b>HC #6: Increase in Homeownership Opportunities - Comprehensive Homeownership Program</b>				
<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>225</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>221</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 achieved 98% of its benchmark although home values have increased dramatically, amidst competition from investors, and historically low inventory making it more challenging to award DPA in FY 2022. AH may evaluate whether to increase the amount of DPA awards or incorporate other strategies for identifying homes for lower-income families.

## **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**

AH innovatively reserves a portion of its Housing Choice Voucher (HCV) 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 later rebranded the concept as HomeFlex.

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 eligible families, the property owner, and AH. Under this premise, AH provides a subsidy for the rental unit on behalf of the eligible family and the property owner accepts the subsidy payment for the unit pursuant to the HomeFlex Agreement. The assistance remains at the community for the next eligible family to use.

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

AH may also solicit private developers and owners interested in reserving a percentage of their multifamily rental units for eligible low-income families and accepting monthly project-based assistance (subsidy) 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.

## HC #1: Additional Units of Housing Made Available -

### HomeFlex as a Strategic Tool

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
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 = 4	Actual number of new HFX communities = 3	<b>Benchmark Not Achieved</b>
	New Standard HomeFlex units = 0	Expected new Standard HomeFlex units = 56	Actual new Standard HomeFlex units = 137	
	New HomeFlex Older Persons units = 0	Expected new HomeFlex Older Persons units = 56	Actual new HomeFlex Older Persons units = 0	
	New HomeFlex Supportive Housing units = 0	Expected new HomeFlex Supportive Housing units = 57	Actual new HomeFlex Supportive Housing units = 29	
	Number of <b>Additional Units of Housing Created</b> prior to implementation of the activity is  <b>0</b>	Expected number of <b>Additional Units of Housing Created</b> after implementation of the activity is  <b>169</b>	Actual number of <b>Additional Units of Housing Created</b> after implementation of the activity is  <b>166</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 = 20	Actual number of renewed HFX communities = 16	<b>Exceeds Benchmark</b>
	Renewed Standard HomeFlex units = 0	Expected renewed Standard HomeFlex units = 311	Actual renewed Standard HomeFlex units = 411	
	Renewed HomeFlex Older Persons units = 0	Expected renewed HomeFlex Older Persons units = 310	Actual renewed HomeFlex Older Persons units = 440	
	Renewed HomeFlex Supportive Housing units = 0	Expected renewed HomeFlex Supportive Housing units = 311	Actual renewed HomeFlex Supportive Housing units = 87	
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>932</b>	After number of <b>Preserved Units of Housing Created</b> after implementation of the activity is <b>938</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 achieved 98% of its new unit goal amid significant increases in market rents and pandemic protocols, which limited AH’s collaboration with housing partners to create new affordable units under the HomeFlex Program. Furthermore, increases in market rent may jeopardize AH’s ability to offer affordable units in the future. 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 utilized HUD standard dependent and medical deductions for eligible households. Through this activity, AH changes requirements to receive the deduction and the deduction amount used to adjust household income in the rent calculation formula.

The table below illustrates the standard deduction and AH’s deduction amounts:

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 intrusive 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 = 11,109	<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>16,663.5 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**

Pandemic protocols effected a portion of FY 2022, which extended processing times. AH anticipates resuming normal operations and moving closer to its goal in FY 2023 and FY 2024.

## AW.2008.02 – LEASING INCENTIVE FEE

### 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). With this knowledge and understanding that AH was planning long-term revitalization of its housing stock, AH sought to assist program participants and indirectly 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: Establishment of HCV Program – AHA is authorized to create its own HCV Program under Attachment D of its Amended and Restated MTW Agreement to provide a leasing incentive fee (LIF). 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 LIF serves to remove or reduce obstacles and barriers preventing low-income families from leasing quality housing in areas of opportunity. Overall, a LIF defrays the cost of application fees, security deposits, and similar out-of-pocket expenses not readily accessible to many voucher-holding families, especially first-time renters. Further, a LIF helps 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 a LIF 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 Inspection 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 - Leasing Incentive Fee (LIF)</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 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 = 84	<b>Benchmark Not Achieved</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	
	<b>Total 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  <b>N/A</b>	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>769</b>	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>564</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**

A tight rental market and escalating rents slowed recruitment of new housing partners.

**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, energy-efficient windows, doors, upgraded bathrooms with low-flow fixtures, as well as modern light fixtures with compact florescent, LED, or other upgraded lighting sources.

These capital improvements complemented and supplemented funding from the American Recovery and Reinvestment Act (ARRA) renovations begun in FY 2010. AH continues to implement energy conservation measures as necessary when recapitalizing AH-Owned properties converted to project-based voucher units under the RAD Program. Since implementation, the cost savings have been higher than projected and through utilization of this activity, AH can keep 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 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.
	Total Annual Benefits (EPC Savings) = \$333,986 (projected)	Expected EPC Savings = \$809,558	Actual EPC Savings = \$833,845	<b>Exceeds Benchmark</b>
	Adjusted EPC Savings = \$0	Expected Adjusted EPC Savings = \$492,094	Actual Adjusted EPC Savings = \$326,988	
	Percent of savings earmarked for AH = 50%	Expected percent of savings earmarked for AH = 50%	Expected percent of savings earmarked for AH = 50%	
	<b>Total Amount of Funds Leveraged</b> prior to implementation of the activity is:	<b>Expected Amount of Funds Leveraged</b> after implementation of the activity is:	<b>Actual Amount of Funds Leveraged</b> after implementation of the activity is:	
<b>\$ 166,993</b>	<b>\$ 158,732</b>	<b>\$ 262,863</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**

This activity did not have any challenges.

## 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

AH proposed **SH.2022.01 – Choice Neighborhoods Down Payment Assistance Program** specifically for low-income families choosing to own a home within the transforming former University Homes public housing site (renamed Scholars Landing). AH is utilizing a \$30 million Choice Neighborhoods Implementation Grant to revitalize the University Choice Neighborhood (UCN) comprised of the Ashview Heights, Atlanta University Center, and Vine City neighborhoods. AH has started the five-phase revitalization plan for Scholars Landing. The first four phases of the plan include scores of rental units, while the fifth and final phase of the plan includes a homeownership component that will include a combination of townhomes, flats, and/or condominiums.

### ii. Actions Taken Towards Implementation

AH has taken steps in designing its Choice Neighborhoods Down Payment Assistance Program while construction continues in the UCN on final rental units and begins on homeownership units. Pandemic economics has affected all facets of the construction process causing a slowdown in the various construction stages.

## 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)

AH proposed activity **RE.2005.09 – Reformulating Subsidy Arrangement in AH-Sponsored Mixed-Use Communities, including Centennial Place and AH’s Affordable Communities** 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 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 accomplishes this effort through various supportive funding vehicles such as receiving additional funding or tenant-protection vouchers and converting Section 9 operating subsidy to long-term Section 8 Project-Based Voucher assistance prior to the Rental Assistance Demonstration (RAD) Program. Nevertheless, AH continues to administer this activity and explore reformulation strategies that improve the long-term sustainability and preserve the public and private investments in other AH-owned and mixed-income rental communities.

### ii. Actions Taken Towards Reactivating the MTW Activity in the Plan Year

AH will assess the need for this activity since it has been awarded a portfolio conversion under the RAD Program.

## 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>15</sup>	2012	AH did not need an MTW waiver to conduct this activity.
	Voluntary Compliance Agreement (VCA)	N/A	2009 <sup>16</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 in the future.
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>15</sup> AH's estimated implementation year of Federal grant award.

<sup>16</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.
AW. 2011.02	HCV Program Housing Assistance Payment Abatement Policy	2011	2011	2022	AH did not need an MTW waiver to conduct this activity.
AW. 2011.03	Aging Well Program	2011	2011	2022	AH did not need an MTW waiver to conduct this activity.
RE 2012.01	Single Family Home Rental Demonstration	2012	2012	2021	AH met its obligation to deliver 26 homes under this format. Until homebuyers completed home purchase, AH will manage a long-term ground lease.
HC. 2012.02	Comprehensive Graduation Program	2012	N/A	2019	AH determined that this activity requires more research. AH may propose this activity in the future.
SH 2013.01	Veterans Supportive Housing	2013	2013	2022	AH no longer needs an MTW waiver to conduct this activity.
HD. 2013.02	Endowment Fund for Human Development Services	2013	N/A	2019	AH determined that this activity requires more research. AH may propose this activity in the future.
PH 2017.01	Elimination of Flat Rent	2017	2017	2020	AH has converted all 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. ACTUAL APPLICATION OF MTW FUNDS

## A. Actual Sources and Uses of MTW Funds

### i. Available 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. Expenditures 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 Application of MTW Funding Flexibility

The MTW PHA shall provide a thorough narrative of actual activities that use only the MTW funding 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 funding flexibility to direct funding towards specific housing and/or service programs and/or other MTW activity, as included in an approved MTW Plan.

#### ACTUAL USE OF MTW SINGLE FUND FLEXIBILITY

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

AH does not identify a singular activity nor multiple activities in which AH utilizes the MTW Single Fund Flexibility that do not require MTW Authorization(s) under Attachment C or D of AH's Standard and Restated MTW Agreement. Rather, unless non-MTW funds are specifically used, AH considers all activities involved in providing affordable housing to residents of Atlanta as utilizing MTW Single Fund Flexibility, as AH does not focus on specific programmatic requirements, but makes business decisions based on sound business intelligence and analysis.

AH continues to direct funding towards specific housing and service delivery programs that respond to local needs or as set forth in AH's business model and which AH determined to best use of funds for the purposes of fulfilling its mission to deliver innovative, affordable housing.

## 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 108 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 2022.

## C. Rental Assistance Demonstration (RAD) Participation

### i. Description of RAD Participation

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

#### RENTAL ASSISTANCE DEMONSTRATION (RAD) PARTICIPATION

AH received a portfolio award to convert 3,741 PH units to long-term Section 8 assistance under the RAD Program. AH elected to convert its PH units to PBV assisted units. AH submitted a RAD Significant Amendment to HUD that HUD approved on November 15, 2016. AH has converted 1,499 units and plans to convert 507 units during FY 2023. AH received several Commitment to Enter into Housing Assistance Payments (CHAPs) in 2018, and various new CHAPs in FY 2022. AH is working to convert its remaining approved public housing portfolio of units by FY 2027.

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

No

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

N/A

## VI. ADMINISTRATIVE

### A. Reviews, Audits, and Inspections

AH is negotiating with HUD's Office of Fair Housing and Equal Opportunity (FHEO) to enter a Voluntary Compliance Agreement (VCA) in response to issues identified in a HUD review covering January 1, 2018 through September 20, 2020. The review commenced on November 20, 2020 and concluded with the issuance of a Letter of Findings on August 13, 2021. Thereafter an appeal was filed and subsequently denied, and the parties have been negotiating since. Once AH and HUD FHEO enter a VCA, HUD FHEO will actively monitor AH's compliance with the VCA.

### B. Evaluation Results

AH did not engage in any PHA-directed evaluations during the reporting period. 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 82 of Appendix A** to review certification.

### D. 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

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### 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 2022 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 28, 2022

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

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### Board Resolution

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## Appendix B: Board Secretary Certificate

### SECRETARY'S CERTIFICATE


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

1. I am the presently appointed and qualified Secretary of the Board of Commissioners of The Housing Authority of the City of Atlanta, Georgia ("AHA"). In such capacity, I am custodian of its records and I am familiar with its organization, membership and activities.
2. Attached hereto as Exhibit 1 is a true and correct copy of the resolution authorizing AHA to submit its Fiscal Year 2022 Moving To Work (MTW) Annual Report to the United States Department of Housing and Urban Development in accordance with AHA's Amended and Restated MTW Agreement.
3. This resolution was presented to the AHA Board of Commissioners (the "Board") at its Regular Meeting on September 28, 2022 (the "Meeting").
4. The following Board members were present for the Meeting:  
  
Larry Stewart, Chair  
Rosalind Elliott  
Duriya Farooqui  
Shelia Harris  
Douglas Hooker  
Tené Traylor
5. At the Meeting, the Board adopted and approved the resolution attached hereto as Exhibit 1.

IN WITNESS WHEREOF, I have hereunto set my hand and the duly adopted official seal of The Housing Authority of the City of Atlanta, Georgia this 28<sup>th</sup> day of September, 2022.

SEAL.



  
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**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 ITS FISCAL YEAR 2022 MOVING-TO-WORK  
ANNUAL REPORT TO THE UNITED STATES DEPARTMENT OF HOUSING  
AND URBAN DEVELOPMENT**

**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”) 2022 MTW Annual Report to HUD by September 30, 2022;

**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 and 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 and AH’s FY 2022 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 2022 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”) 2022 Moving-to-Work (“MTW”) Annual Report is hereby approved.
2. The President and Chief Executive Officer is authorized to submit AH’s FY 2022 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.

3. 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 2022 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, 28<sup>th</sup> day of September 2022.

ATTEST:

APPROVAL:



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



**Larry Stewart**  
**Chair**

APPROVAL FOR FORM AND LEGAL SUFFICIENCY:



**Dwayne C. Vaughn**  
**General Counsel**

## FY 2022 MTW ANNUAL REPORT BENCHMARKS SUMMARY



### OVERVIEW – 2022 MTW REPORT


AH accomplished or achieved the following despite pandemic protocols influencing AH operations:

- **Increased households served** to 26,619 households served.
- **Added 666 new affordable units** through closings, agreements, and awards:
  - Financially closed on 2 Co-Investment projects to create 224 new affordable units;
  - Provided DPA to 221 qualified first-time homebuyers to make homeownership affordable;
  - Executed 3 new HomeFlex Agreements to create 166 affordable units; and
  - Financially closed on 1 University Choice Neighborhoods project to create 56 affordable units (72 total units).
- **Preserved 1,097 existing affordable units:**
  - Renewed 16 HomeFlex Agreements to preserve 938 affordable units.
  - Converted 2 Public Housing communities to PBV communities to preserve 159 affordable units.

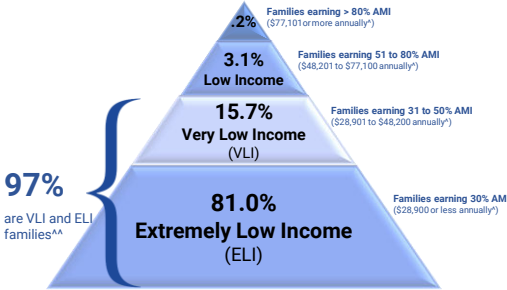


## OVERVIEW – 2022 MTW REPORT

- **Newly leased 674 HCV families.**
- **Housed 1,457 targeted households** with Special Purpose Vouchers (SPVs):
  - 766 HHs with HUD FUP, MS5, NED, and VASH SPVs.
  - 691 HHs under programs created by AH's Special Program Vouchers.
    - 102 Emergency Housing Vouchers (EHVs) of 202 EHV's awarded.
- **Helped 270 families stabilize their housing under AH's Home Again Program.**
- **Graduated 29 ACCESS participants**, AH's technology-based training program.
  - Assisted 8 participants (since inception) in securing employment; AH considering 1 participant.
  - 9 of those participants furthered their training by taking a Scrum Master Class.
- **Awarded the James Allen Community Scholars Award to 11 students (\$55k).**
  - Facilitated scholarship opportunities for 14 AH-assisted students totaling \$72,000.

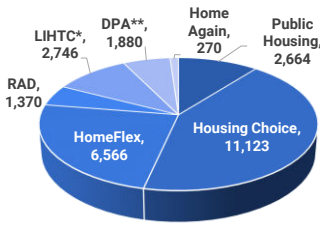


## BREAKDOWN: ASSISTED HOUSEHOLDS




**97%** are VLI and ELI families\*\*

\*Source: HUD Income Limits: Approved April 2022 for a Family of Four.  
\*\*Source: Data Reporting and Analysis



\*LIHTC = Low-Income Housing Tax Credit  
\*\*Note: DPA totals are cumulative since program inception



**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	2022 Actual	Benchmark Outcome
<b>Public Housing Program</b>				
• % Rents Uncollected	2.0%	2.0%	5.7%	Benchmark Not Achieved
• Occupancy Rate	98%	98%	96%	Benchmark Not Achieved
• Emergency Work Orders Completed or Abated in <24 hours	99%	99%	94%	Benchmark Not Achieved
• Routine Work Orders Completed in <30 Days	5 Days	30 Days	5 Days	Exceeds Benchmark
• % Planned Inspections Completed	100%	100%	NR	Exceeds Benchmark
<b>Housing Choice Program (Section 8)</b>				
• Budget Utilization Rate	98%	98%	104%	Exceeds Benchmark
• Success Rates (Lease-up)	N/A	66%	32%	Benchmark Not Achieved
• % Planned Annual Inspections Completed	98%	98%	97%	Benchmark Not Achieved
• Quality Control Inspections	≥ 1.4%	≥ 1.4%	2.2%	Exceeds Benchmark
<b>Community and Support Service</b>				
• Resident Homeownership	6	6	0	Benchmark Not Achieved
• Resident Workforce Participation	6,415	6,236	6,030	Benchmark Not Achieved
<b>Finance</b>				
• Project-Based Financial Closings	N/A	3	2	Benchmark Not Achieved

Benchmark Outcome explanation for ""Benchmark Not Achieved" result:

**Public Housing:** Pandemic protocols affected a significant portion of rent collection, move-ins, move-outs, program graduations, and end-of-program actions. These protocols limited the organic attrition that affects leasing operations. In addition, AH continued to strategically operate 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 a portion of pandemic protocols reduced the availability of units and families' ability to search for and lease-up units before June 30, 2022. Although AH implemented virtual inspections, limited technology proficiency among some residents and landlords prevented AH from reaching all units. These units will be carried forward for inspection.

**Community and Supportive Service:** AH offers a voluntary down payment assistance program to current program participants. benchmark outcomes are predicated on families interested in and qualified to purchase a home. Other factors such as increasing housing costs and rising interest rates may have affected participants' confidence level in their ability to purchase a home.

**Finance:** AH's project-based financial closings is based on HomeFlex agreements and Public Housing unit conversions under the Rental Assistance Demonstration (RAD) Program.

## **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 23, 2022, 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, and occupancy tracking. Management agents are responsible for implementing AH housing policies; 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 23, 2022, states:

- Participants must pay a minimum 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 2021 and the FY 2022 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 2021, approximately 98% or **1,178** of the resident households paid rents greater than the Minimum Rent. Another 0.33% or **4** households paid rents at the \$125 Minimum Rent level. Additionally, approximately 1.91% or **23** of all households paid less than the Minimum Rent.
- In FY 2022, approximately 98% or **1,069** of the resident households paid rents greater than the Minimum Rent. Another 0.33% or **4** households paid rents at the \$125 Minimum Rent level. Additionally, approximately 1.91% or **19** of all households paid less than the Minimum Rent.

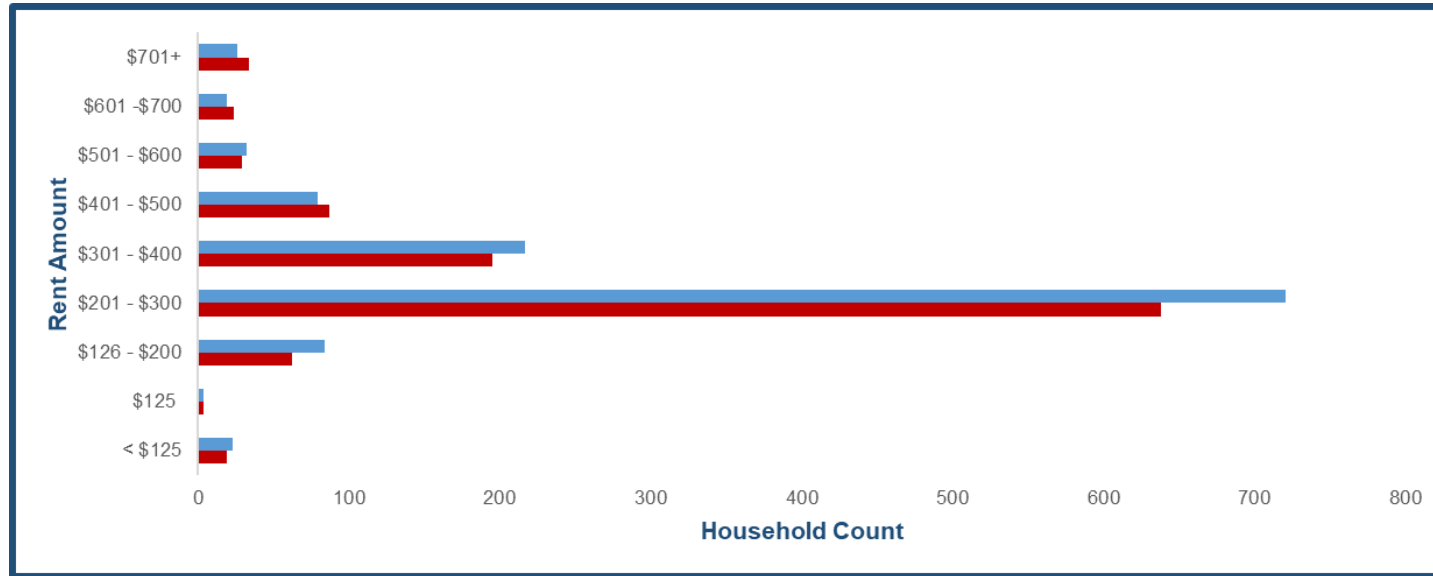
**Chart 2** compares the FY 2021 and the FY 2022 rents (Total Tenant Payment) paid by Housing Choice Tenant-Based Program households. The analysis excludes households in which all members are elderly or disabled.

- In FY 2021, approximately 91% or **8,735** of the resident households paid rents greater than the Minimum Rent. Another 6% or **536** households paid rents at the \$125 Minimum Rent level. Additionally, approximately 3.40% or **326** of all households paid less than the Minimum Rent.
- In FY 2022, approximately 90% or **8,582** of the resident households paid rents greater than the Minimum Rent. Another 7% or **701** households paid rents at the \$125 Minimum Rent level. Additionally, approximately 4.0% or **345** 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.

**CHART 1 - Minimum Rent Policy Impact Analysis**  
**Households in Section 9 Operating Subsidy Funded Units - AH-Owned Communities**  
 (As of June 30, 2022)



**FY 2022\***

Rent Amount	< \$125	\$125	\$126 - \$200	\$201 - \$300	\$301 - \$400	\$401 - \$500	\$501 - \$600	\$601 - \$700	\$701+
HH Count	19	4	62	638	195	87	29	24	34
% of HHs	1.7%	0.4%	5.7%	58.4%	17.9%	8.0%	2.7%	2.2%	3.1%

**FY 2021\***

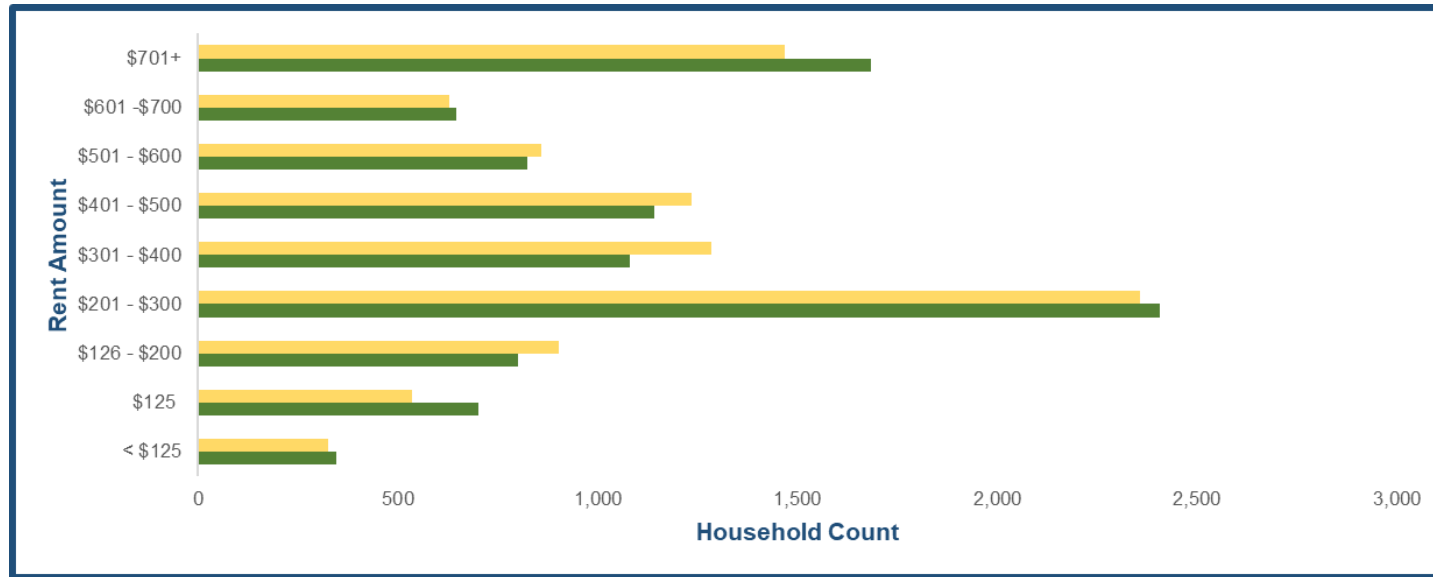
Rent Amount	< \$125	\$125	\$126 - \$200	\$201 - \$300	\$301 - \$400	\$401 - \$500	\$501 - \$600	\$601 - \$700	\$701+
HH Count	23	4	84	721	217	79	32	19	26
% of HHs	2.1%	0.4%	7.7%	66.0%	19.9%	7.2%	2.9%	1.7%	2.4%

\*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.

**CHART 2 - Minimum Rent Policy Impact Analysis**  
**Households Receiving Section 8 Subsidy - Housing Choice Tenant-Based Program**  
 (As of June 30, 2022)



**FY 2022\***

Rent Amount	< \$125	\$125	\$126 - \$200	\$201 - \$300	\$301 - \$400	\$401 - \$500	\$501 - \$600	\$601 - \$700	\$701+
<b>HH Count</b>	345	701	802	2,405	1,080	1,142	823	646	1,684
<b>% of HHs</b>	3.6%	7.3%	8.3%	25.0%	11.2%	11.9%	8.5%	6.7%	17.5%

**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%	24.5%	13.3%	12.8%	8.9%	6.5%	15.2%

\*Note: HH = Households.

(1) Excludes Households that are exempted under the Minimum Rent policy (i.e., 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 23, 2022, 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 that 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, Article Eleven, Paragraph 1** of the Amended and Restated Statement of Corporate Policies adopted by the Board of Commissioners on March 23, 2022, provides the policy direction for HomeFlex (AH's MTW Project-Based Rental Assistance Program). 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 4.24% (**32 households**) are subject to the policy. Of households assisted in MIXED HomeFlex Communities, only 3.2% (**35 households**) are subject to the policy. Of households assisted in HomeFlex Developments, only 3.51% (**113 households**) of Elderly households are subject to the policy. Of households assisted in AH's Housing Choice Voucher program, only 13.56% (**229 households**) of Elderly households are subject to the policy. Of households assisted in Mixed Public Housing Communities, only 3.88% (**12 households**) are subject to the policy. Of households assisted in Rental Assistance Demonstration and Project Based Voucher program, 5.37% (**28 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 2.60% (**7 households**) and 3.20% (**35 households**), respectively, are subject to the policy. Of households assisted in HomeFlex Developments, 2.54% (14 households) of Non-Elderly Disabled households are subject to the policy. Of households assisted in AH's Housing Choice Voucher program, 21.68% (**395 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 3.21% (**6 households**) and 3.83% (**7 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 allowance.*

**EXHIBIT OPS-1 – CHARTS 1 and 2**

**ELDERLY AND NON-ELDERLY DISABLED INCOME DISREGARD POLICY IMPACT ANALYSIS**  
(As of June 30, 2022)

**CHART 1**

HOUSEHOLDS WITH ELDERLY		FIXED INCOME AND EMPLOYMENT INCOME (Disregard Applies)	
Program Type	N	N	% Of Total Households
AH-Owned Communities	755	32	4.24%
MIXED HomeFlex Communities	1,095	35	3.20%
MIXED Public Housing Communities	309	12	3.88%
MIXED RAD Communities	153	4	2.61%
HomeFlex Developments	3,216	113	3.51%
RAD/PBV Communities	489	28	5.73%
Housing Choice Tenant-Based Programs	1,689	229	13.56%
	7,706	453	5.88%

*N = Number*

**CHART 2**

HOUSEHOLDS WITH NON-ELDERLY DISABLED ADULTS		FIXED INCOME AND EMPLOYMENT INCOME (Disregard Applies)	
Program Type	N	N	% Of Total Households
AH-Owned Communities	269	7	2.60%
MIXED HomeFlex Communities	58	4	6.90%
MIXED Public Housing Communities	187	6	3.21%
MIXED RAD Communities	71	4	5.63%
HomeFlex Developments	552	14	2.54%
RAD/PBV Communities	183	7	3.83%
Housing Choice Tenant-Based Programs	1,822	395	21.68%
	3,142	437	13.91%

*N = Number*

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

**POLICY BACKGROUND**

**Part I, Article Eleven, Paragraph 2** of the Amended and Restated Statement of Corporate Policies adopted by the Board of Commissioners on March 23, 2022, states:

STANDARD INCOME DEDCUTIONS 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 childcare 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 appeals process that allows families to file for hardships. Based on the Chart 1 below, **no assisted households submitted hardship requests because of the policy.**

Chart 1

Program Type	ELDERLY/DISABLED DEDUCTION							DEPENDENT DEDUCTION						
	Housing Choice	AH-Owned	Mixed HomeFlex	Mixed Public Housing	Mixed RAD	HomeFlex	RAD PBV	Housing Choice	AH-Owned	Mixed HomeFlex	Mixed Public Housing	Mixed RAD	HomeFlex	RAD PBV
Total Number of Households Benefitting	3,511	1,024	1,153	496	224	3,768	672	4,973	61	253	345	754	675	2
Number of Households with Hardship Request	0	0	0	0	0	0	0	0	0	0	0	0	0	0

RAD = Renatal Assistance Demonstration; PBV = Project-Based Voucher

**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 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 2018 Actual	FY 2019 Actual	FY 2020 Actual	FY 2021 Actual	FY 2022 Actual	FY 2023 EOY Projection
AH-Owned	PH	1,586	1,586	1,261	1,261	1,132	1,132
MIXED	PH	2,155	2,155	1,562	1,562	1,532	1,532
	RAD PBV	423	423	1,503	1,340	1,370	1,370
	HF	1,543	1,509	1,358	1,521	1,521	1,521
	LIHTC	1,131	1,084	1,088	1,081	1,078	1,078
HomeFlex	HF	4,012	4,230	4,803	4,841	5,045	5,065
	LIHTC	1,595	1,589	1,585	1,588	1,668	1,668
Housing Choice: Tenant-Based	HCV	8,608	9,094	9,393	9,597	9,628	9,628
Housing Choice: Ports	HCV	2,029	1,860	1,711	1,745	1,481	1,481
Housing Choice: Homeownership	HCV	23	19	18	17	14	14
Homeownership - Other	DPA	724	993	1,225	1,659	1,880	2,151
Short-Term Housing Assistance	MTW	215	380	244	295	270	295
<b>Totals:</b>		<b>24,044</b>	<b>24,922</b>	<b>25,751</b>	<b>26,507</b>	<b>26,619</b>	<b>26,935</b>

## Appendix C: Elements of Legacy Attachment B

### By Unit Size

Community & Program Type	FY 2021 Households by Unit Size						FY 2022 Households by Unit Size						2021 to 2022	
	0 BRs	1 BRs	2 BRs	3 BRs	4+ BRs	Total	0 BRs	1 BRs	2 BRs	3 BRs	4+ BRs	Total	# Change	% Change
AH-Owned	254	860	45	20	26	1,205	249	753	43	19	28	1,092	-113	-9.4%
MIXED	12	1,356	1,209	413	27	3,017	11	1,333	1,179	391	24	2,938	-79	-2.6%
RAD PBV Conversions	85	691	317	153	17	1,263	85	698	319	158	16	1,276	13	1.0%
HomeFlex	261	2,748	1,381	199	5	4,594	264	2,784	1,442	218	7	4,715	121	2.6%
Housing Choice: Tenant-Based	50	2,420	3,449	2,788	907	9,614	64	2,449	3,447	2,776	906	9,642	28	0.3%
Housing Choice: Ports	1,745	0	0	0	0	1,745	1,481	0	0	0	0	1,481	-264	-15.1%
<b>Totals:</b>	<b>2,407</b>	<b>8,075</b>	<b>6,401</b>	<b>3,573</b>	<b>982</b>	<b>21,438</b>	<b>2,154</b>	<b>8,017</b>	<b>6,430</b>	<b>3,562</b>	<b>981</b>	<b>21,144</b>	<b>-294</b>	<b>-1.4%</b>

**Note:** The totals above exclude Local, Non-Traditional unit counts as AH does not track this information individually.

## Appendix C: Elements of Legacy Attachment B

### By Family Composition

Community & Program Type	FY 2021 Households by Family Size						FY 2022 Households by Family Size						2021 to 2022	
	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	1,081	75	12	14	23	1,205	973	69	16	12	22	1,092	-113	-9.4%
MIXED	1,723	601	369	195	129	3,017	1,705	565	359	187	122	2,938	-79	-2.6%
RAD PBV Conversions	819	215	141	52	36	1,263	830	224	136	51	35	1,276	13	1.0%
HomeFlex	3,344	844	249	104	53	4,594	3,467	836	254	108	50	4,715	121	2.6%
Housing Choice: Tenant-Based	3,091	2,387	1,804	1,190	1,142	9,614	3,133	2,377	1,805	1,179	1,148	9,642	28	0.3%
Housing Choice: Ports	350	311	334	370	380	1,745	293	271	280	309	328	1,481	1,481	-15.1%
<b>Totals:</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>10,401</b>	<b>4,342</b>	<b>2,850</b>	<b>1,846</b>	<b>1,705</b>	<b>21,144</b>	<b>1,451</b>	<b>-1.4%</b>

**Note:** The totals above exclude Local, Non-Traditional unit counts as AH does not track this information individually.

## Appendix C: Elements of Legacy Attachment B

### By Area Median Income (AMI) Group

Community & Program Type	FY 2021 Households by Income Group					FY 2022 Households by Income Group					2021 to 2022	
	≤ 30% AMI	31 - 50% AMI	51 - 80% AMI	≥ 81% AMI	Total	≤ 30% AMI	31 - 50% AMI	51 - 80% AMI	≥ 81% AMI	Total	# Change	% Change
AH-Owned	1,100	89	12	4	1,205	1,005	73	13	1	1,092	-113	-9.4%
MIXED	2,260	617	127	13	3,017	2,291	520	117	10	2,938	-79	-2.6%
RAD PBV Conversions	1,017	202	38	6	1,263	1,056	190	28	2	1,276	13	1.0%
HomeFlex	3,710	787	92	5	4,594	3,946	695	74	0	4,715	121	2.6%
Housing Choice: Tenant-Based	7,032	2,025	523	34	9,614	7,351	1,837	429	25	9,642	28	0.3%
Housing Choice: Ports	1,745	0	0	0	1,745	1,481	0	0	0	1,481	-264	-15.1%
<b>Totals:</b>	<b>16,864</b>	<b>3,720</b>	<b>792</b>	<b>62</b>	<b>21,438</b>	<b>17,130</b>	<b>3,315</b>	<b>661</b>	<b>38</b>	<b>21,144</b>	<b>-294</b>	<b>-1.4%</b>

	Total ≤ 50% AMI (VLI & ELI Families)	Total > 50% AMI
<b>Number of HHs by Income</b>	20,445	699
<b>% of HHs Served</b>	97%	3%

**Note:** The totals above exclude Local, Non-Traditional unit counts as AH does not track this information individually.

## Appendix C: Elements of Legacy Attachment B

### By Waiting List Characteristics

Community & Program Type	FY 2022 WL Households by Unit Size					FY 2022 WL Households by Family Size					FY 2022 WL HHs by Income Group				FY 2022 Total
	Studio	1 BR	2 BR	3 BR	4+ BR	1 Mbr	2 Mbr	3 Mbr	4 Mbr	5+ Mbr	≤ 30% AMI	31 - 50% AMI	51 - 80% AMI	> 80% AMI	
AH-Owned		2,681	158	129	6						2,684	262	23	5	2,974
MIXED	0	11,370	11,176	7,915	622						14,191	15,868	920	104	31,083
RAD PBV Conversions															0
HomeFlex	15	6,758	4,382	3,113	3						6,378	5,736	2,098	59	14,271
Housing Choice: Tenant-Based						4,690	6,711	5,395	3,281	2,623	18,404	3,702	473	121	22,700
<b>Totals:</b>	<b>15</b>	<b>20,809</b>	<b>15,716</b>	<b>11,157</b>	<b>631</b>	<b>4,690</b>	<b>6,711</b>	<b>5,395</b>	<b>3,281</b>	<b>2,623</b>	<b>41,657</b>	<b>25,568</b>	<b>3,514</b>	<b>289</b>	<b>71,028</b>

**Note:** The totals above exclude Local, Non-Traditional waiting list counts as AH does not track this information individually. In addition, waiting List data is fluid and is a data "snapshot" of each Waiting List as of June 30, 2022. 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 in this document (see page 30). 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 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 in this document (see page 88). 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.

## Appendix C: Elements of Legacy Attachment B

### 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 number 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 88** 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, 2021:

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. 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 can 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 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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Appendix E: COVID-19 Waiver Utilization

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 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 more than 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

A high-level overview of AH's annual survey is below, which is available by email. Please send request to: [strategy@atlantahousing.org](mailto:strategy@atlantahousing.org).

### FY 2022 Resident Satisfaction Survey Summary of Results

Demographics				
	Under 49	50 - 69	70+	
<b>1. Please indicate your age group.</b>				
Number of responses	53	208	180	
Total responses received for this question	441	441	441	
Percentage	12.0%	47.2%	40.8%	
	Fewer than 5 years	5 to 9 years	10 to 15 years	More than 15 years
<b>2. How many years have you lived in this community?</b>				
Number of responses	127	96	81	134
Total responses received for this question	438	438	438	438
Percentage	29.0%	21.9%	18.5%	30.6%
Overall Satisfaction				
	Poor	Average	Good	Very Good
<b>3. How do you rate your quality of life in your community?</b>				
Number of responses	8	55	156	216
Total responses received for this question	435	435	435	435
Percentage	1.8%	12.6%	35.9%	49.7%
	Yes	No	NR	
<b>4. Would you tell a friend or family member to move to your community?</b>				
Number of responses	378	57	0	
Total responses received for this question	435	435	435	
Percentage	86.9%	13.1%	0.0%	