there's no place like home...

Atlanta Housing Authority

CATALYST Implementation Plan & Appendices

(Fiscal Year Ending 2010)

Board Approved

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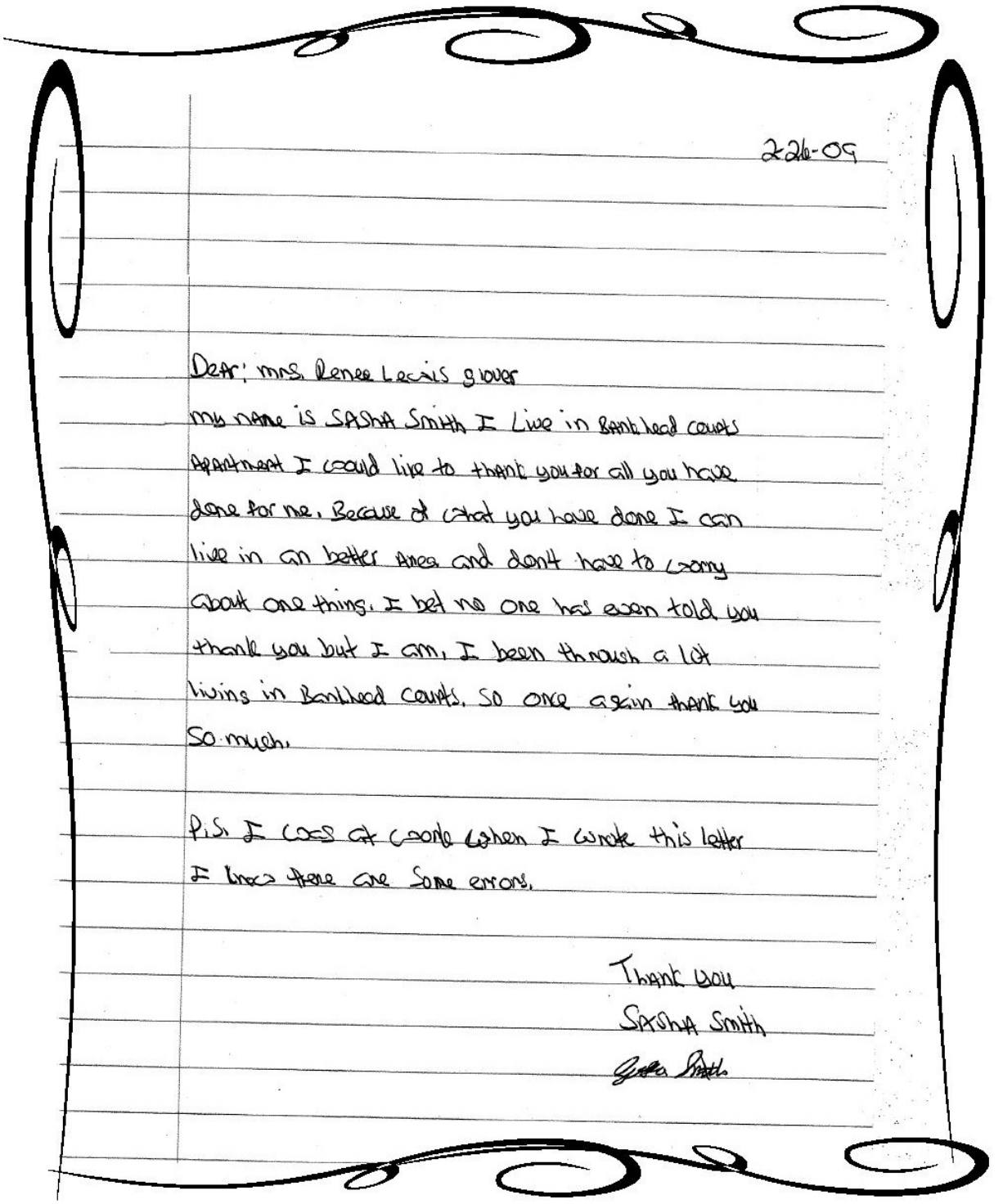
"Home means a place of nuturing, love, togetherness, protection, learning, teaching, caring for, embracing, celebrating friendships. It's really the heart of all of our lives and there is nothing more important than home."

Renée Lewis Glover



2-26-09

Dear; mrs. Renee Lecils glover
my name is SASHA Smith I Live in Bankhead courts
Apartment I could like to thank you for all you have
done for me. Because of what you have done I can
live in an better area and dont have to worry
about one thing. I bet no one has ever told you
thank you but I am, I been through a lot
living in Bankhead courts. So once again thank you
so much.

P.S. I was at work when I wrote this letter
I know there are some errors.

Thank you
Sasha Smith
Sasha Smith

A Special Thanks by
*** Sasha Smith***

INTRODUCTION

The Housing Authority of the City of Atlanta, Georgia (AHA), a public body corporate and politic created under the Housing Authorities Laws of the State of Georgia, is a diversified real estate company, with a public mission and purpose. AHA achieves its mission by deploying various assets that provide affordable housing opportunities for low-income families in the City of Atlanta. AHA has broad corporate powers including, but not limited to, the power to acquire, manage, own, operate, develop and renovate housing, invest and lend money, create for-profit and not-for-profit entities, administer Housing Choice vouchers, issue bonds for affordable housing purposes and develop commercial, retail and market rate properties that benefit affordable housing. Many of AHA's programs are funded, in part, and regulated by the U.S. Department of Housing and Urban Development (HUD) under the provisions of the U.S. Housing Act of 1937, as amended, as modified by AHA's Moving to Work Agreement dated September 23, 2003, as amended and restated effective as of November 13, 2008 and further amended on January 16, 2009 ("MTW Agreement").

Pioneering Efforts: AHA's Revitalization Program

Since the start of Ms. Glover's leadership at AHA in September 1994, AHA has chartered new courses and embarked on important and ambitious visions: to transform the delivery of affordable housing by ending the practice of concentrating low income families and abandoning the traditional 100% public housing model through implementing its comprehensive and strategic Revitalization Program. Under AHA's Revitalization Program, public housing-assisted households are relocated, by their choice, primarily to private housing (using Housing Choice vouchers to close the gap for the cost of housing and utilities) or to other AHA-owned public housing developments. The distressed and obsolete housing projects are demolished and the site remediated and prepared for development and through partnerships with excellent private sector developers, market rate quality mixed-use, mixed-income communities are developed. Consistent with AHA's vision of **"Healthy Mixed-Income Communities,"** AHA's Revitalization Program is designed to create communities where Atlanta's families, from every socio-economic status, can live, learn, work and play, as they pursue their version of the American dream. AHA believes that every person has unlimited human potential and promise, but the quality of his or her living environment impacts the outcome.

AHA's Revitalization Program is governed by **five guiding principles**:

1. End the practice of concentrating low income families in distressed and isolated neighborhoods.

2. Develop communities through public/private partnerships using public and private sources of funding, using market principles.
3. Create mixed-income communities with the goal of creating market rate communities with a seamless affordable component.
4. Create healthy communities using a holistic and comprehensive approach to ensure long-term marketability and sustainability and to support excellent outcomes for families, especially children, with emphasis on excellent, high performing neighborhood schools and excellent quality of life amenities, such as first-class retail and green space.
5. Residents should be supported with adequate resources to assist them to achieve their life goals, focusing on self-sufficiency and educational advancement of the children. Expectations and standards for personal responsibility should be benchmarked for success.

Since 1994, AHA has been able to successfully deconcentrate poverty through implementing its Revitalization Program. AHA has leveraged its HOPE VI and other public housing development funds, its land, and its operating subsidies to facilitate, in partnership with private sector developers and owners, the availability of quality affordable housing opportunities in mixed-use, mixed-income communities throughout Atlanta. As a result, neighborhoods throughout the City of Atlanta have been transformed to healthy economically integrated communities with great neighborhood schools and other wonderful quality of life amenities. The real estate and human development outcomes have been outstanding – healthier, economically integrated, amenity-rich communities, increased real estate values, dramatically lower rates of crime, improved student and school performance and substantially higher participation in the workforce by the assisted-households.

Moving to Work Demonstration

Having moved from troubled agency status in 1994 to high performer status in 1999 and sustaining that status thereafter, AHA applied for and received a coveted Moving to Work (MTW) designation in 2001. MTW is a demonstration program established by Congress and administered by HUD, giving participating public housing agencies the flexibility to design and test various approaches for facilitating and providing quality affordable housing opportunities in their localities. After protracted negotiations with HUD, AHA executed its MTW Agreement with HUD on September 23, 2003, the initial period of which was effective from July 1, 2003 through June 30, 2010. In response to HUD's decision to expand and extend the demonstration period, AHA and HUD negotiated and executed an Amended and Restated MTW Agreement, effective as of November 13, 2008, and further amended by that certain Second Amendment to the Moving to Work Agreement, effective as of January 16, 2009 (the MTW Agreement, as amended

and restated and further amended is referred to herein as the "Restated MTW Agreement"). The term of AHA's Restated MTW Agreement was extended until June 30, 2018. AHA and HUD agreed that the MTW Agreement may be automatically extended for additional ten-year periods, subject to HUD's approval and AHA meeting certain agreed upon conditions. The Restated MTW Agreement reaffirms and clarifies the use of MTW Funds and provides that AHA may use its MTW Funds for housing for low-income families beyond the limitations of Section 8 and Section 9 of the U.S. Housing Act of 1937, as amended. The section in this Plan entitled "MTW Use of Funds" further describes how AHA will use this enhanced flexibility in furthering its goals and objectives under AHA's Business Plan.

AHA's program design for implementing its Restated MTW Agreement leverages the guiding principles, the best practices and lessons learned from AHA's Revitalization Program. The Restated MTW Agreement continues to provide substantial statutory and regulatory relief under the U. S. Housing Act of 1937, as amended ("1937 Act"), and reaffirms, extends and expands the statutory and regulatory relief provided under AHA's original MTW Agreement. The Restated MTW Agreement forms the statutory and regulatory framework and agreed upon by AHA and HUD for AHA to carry out its work during the term of the Restated MTW Agreement, as it may be extended, as set forth in AHA's Business Plan, as amended from time to time.

AHA's Business Plan

In 2004, AHA prepared and submitted to HUD its first Business Plan, using this new statutory and regulatory relief (herein referred to herein as the "Business Plan" or "CATALYST Plan"). AHA's Business Plan and its subsequent annual MTW implementation plans outline AHA's priority projects, activities and initiatives to be carried out over the course of each fiscal year.

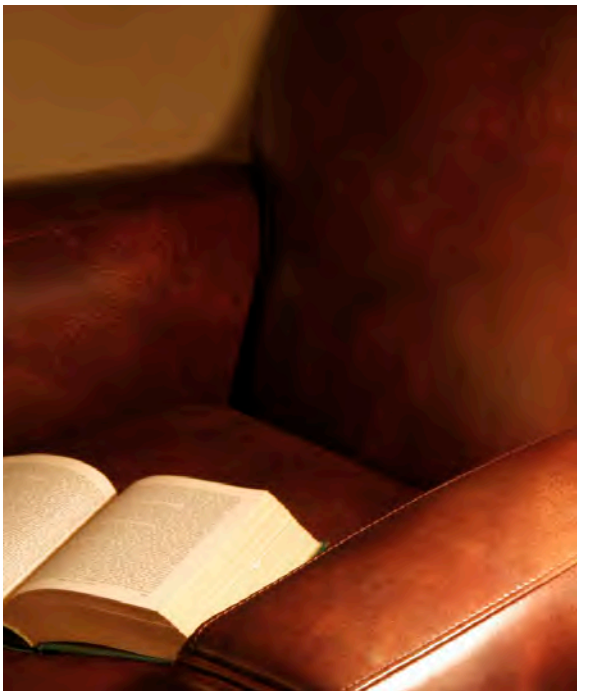
The Plan set forth herein represents AHA's Fiscal Year (FY) 2010 CATALYST Implementation Plan.

As Fiscal Year 2010 represents AHA's seventh year under its MTW Agreement, AHA continues to make substantial strides in achieving its vision. Consistent with the guiding principles, **AHA's three primary goals under the Business Plan** are:

1. Developing quality living environments in mixed-income communities;
2. Enhancing AHA's economic viability and sustainability; and
3. Increasing self-sufficiency, financial independence and successful outcomes for families by leveraging AHA's human development and support services investments.

AHA develops and submits its annual CATALYST Implementation Plan to HUD after assessing the affordable housing needs of the local jurisdiction; considering financial and other resources; and soliciting resident and public input and consultation through a public hearing process. Once HUD receives the Plan it is reviewed for consistency with AHA's MTW Agreement.

When HUD approves the annual CATALYST Implementation Plan, the approval is deemed to be cumulative; and remains in effect for the duration of the MTW Agreement period, as it may be extended from time to time.



“Home for my children is somewhere they can feel safe, relax after long days at school, where they can have entertainment, rest, love and support.”

⁎Tomekia Dunn⁎

EXECUTIVE SUMMARY

Using the authority under its Restated MTW Agreement, AHA continues to realize its vision in creating "Healthy Mixed-Income Communities" and becoming an excellent, financially viable, diversified real estate company with a public mission and purpose. Towards this end, AHA's Fiscal Year (FY) 2010 CATALYST Implementation Plan (the "FY 2010 MTW Annual Plan") focuses on excellent affordable housing opportunities in economically diverse environments; improved customer service and mutual accountability; excellent outcomes for AHA-assisted households through targeted investments and partnerships with human development professionals and excellent service providers; and improved operational effectiveness and efficiency by leveraging innovative approaches and technology. The FY 2010 Business Plan identifies the projects, priorities, activities and initiatives that AHA will continue to implement and initiate during the fiscal year ending June 30, 2010.

AHA's FY 2010 MTW Annual Plan will be aligned around **seven major priorities**, which are highlighted as follows:

1. **Revitalization Program** – AHA will continue its strategic revitalization program. AHA and its various private sector development partners are engaged in "community building" projects with the goal of creating healthy and economically sustainable mixed-use, mixed-income communities.

2. **Quality of Life Initiative** – AHA will complete the relocation of affected households from 12 of its distressed and obsolete public housing developments, including two senior high-rises and 10 family communities. Combined, these developments provided housing for more than 3,000 households, many of whom have already relocated to better communities and better neighborhoods since the approval by HUD of the demolition application for such developments. Affected households will continue to receive coaching and counseling services for a 27-month period to support (a) successful resettlement in privately owned housing; (b) achieving economic independence; and (c) achieving family success. After the affected families have successfully relocated, AHA will demolish the existing structures and will conduct a competitive procurement process to invite proposals from private sector developers and investors to develop mixed-use, mixed-income communities at these sites. Any sale proceeds from the sale of any portion of the sites will be used to further AHA's vision and mission.

3. **Project Based Rental Assistance As A Development Tool** – AHA will continue to utilize Section 8 project based rental assistance as a development tool with the goals of (a) facilitating housing opportunities for families in healthy mixed-income communities; (b) facilitate the development of housing for the elderly; and (c) facilitate the development of supportive services housing for persons with disabilities and other transitional housing.

4. **Re-engineering the Housing Choice Voucher Program** – AHA has designed and implemented a number of local reforms to its Housing Choice Voucher Program so that a housing choice voucher can be an effective resource for accessing high quality housing in lower poverty, economically integrated neighborhoods. In addition, AHA will continue to re-engineer the Housing Choice Voucher Program Administration, including redesigning business systems, implementing technology solutions, improving customer service delivery, human resources development, and refining participant and landlord policies and procedures.

5. **Asset Management** – AHA will continue to develop and evolve the systems, processes, procedures and human resources to create a comprehensive and integrated asset management capacity, with an emphasis on external business relationship management and technology-oriented solutions.

6. **Human Development** – AHA will continue to facilitate and provide linkages for AHA-assisted families to human services providers to ensure healthy outcomes with the goals of (a) economically independent families; (b) educated children; and (c) self-sufficient elderly and persons with disabilities.

7. **Longer-Term Hold Communities** – This priority focuses on improving the quality of the facilities of its longer-term hold properties and developing expertise in housing for elderly persons - By June 30, 2010, at which date, AHA will have successfully completed the relocation and demolition phases of its QLI Program, AHA will have closed the door on concentrating households in obsolete, distressed and dysfunctional large family public housing projects. At June 30, 2010, AHA will own 11 senior high-rise buildings which provide housing for elderly persons (80%) and young disabled persons (20%) and two small family public housing-assisted developments (Westminster – 32 units and Martin Street – 60 units), all of which are located in economically integrated neighborhoods. Each of these properties will continue to be owned by AHA and comprehensively managed by professional private management companies in accordance with AHA's goals, objectives and financial resources.

   During FY 2010, AHA intends to invest more than $18 million of ARRA funds in these 13 properties, with the goals of improving the quality of the dwelling units, major systems, common areas

and building envelop and improving the energy efficiency, environmental quality and sustainability of the facilities.

As a result of the change in the mix of the AHA-owned portfolio from large family public housing developments to housing primarily for elderly persons by June 30, 2010, AHA will need to develop a deeper understanding of the needs, services and best practices for housing elderly persons so they may live independently and with dignity and a good quality of life as they age in place. AHA, in partnership with our private sector development partners and professional service providers, intend to create a model for "Affordable Assisted Living" for elderly persons and for persons with mental and developmental disabilities and other supportive service housing models.

In addition to the seven major priorities, this Plan also discusses the following **new initiatives**:

- Innovative and creative use of **MTW Funds** to facilitate the development of additional mixed-income communities and to further AHA's Revitalization Program. This is discussed under the section of the Plan entitled "Innovative and Creative Use of MTW Funds."

- Development and implementation of a **Comprehensive Integrated and Relational Agency-wide database**, which is discussed under Corporate Support.

- Proposed use of **American Recovery and Reinvestment Act (ARRA) Funds** to facilitate high-quality and more energy efficient affordable housing and to facilitate mixed-income, mixed-finance developments. This is covered under the Real Estate Management and ARRA sections of the Plan.

- Design of AHA's **Local Asset Management Program** which is discussed under Corporate Support and ***Appendix T*** of this Plan.

AHA also speaks to the on-going operations of its longer-term hold communities under **Real Estate Management** and a number of organizational-wide initiatives under **Corporate Support**. For AHA's new and ongoing projects, priorities, activities and initiatives, AHA will continue to use its authority under the Restated MTW Agreement to implement.

Local Innovations and Reforms At a Glance

The following represents an "At a Glance" overview of a number of key innovations or reforms AHA

has implemented as a result of its participation in the MTW Demonstration. The key reform categories are:

- **Use of MTW Funds** – Describes the use of MTW Funds to support MTW Eligible Activities (as defined in the Restated MTW Agreement and the FY 2010 MTW Annual Plan), gap financing for AHA-sponsored mixed-income communities and for affordable residential development with private owners and developers.

- **Housing Choice Voucher Program** – AHA has used its authority under the Restated MTW Agreement to design and implement local reforms to AHA's Housing Choice Voucher Program, with the goals of mainstreaming families and facilitating excellent "choices" of housing opportunities in economically integrated neighborhoods, with better quality of life amenities. The local reforms have focused on eliminating obstacles and solving problems which have adversely affected the acceptance and use of vouchers in lower impacted neighborhoods, e.g. AHA Payment Standards; leasing incentive fees, higher expectations and standards for AHA assisted households and the use of conventional real estate standards and requirements for landlords. AHA has also adopted reforms that have fixed the amount of the Total Tenant Payment to no more than 30% of Adjusted Income in order to stabilize the amount a Housing Choice participant pays for rent and utilities.

- **Housing Policies** – Outlines a number of policies that AHA has instituted under MTW that promote tenant accountability and responsibility, self sufficiency and improves AHA's bottom line.

- **Expanding Housing Opportunities** – This reform highlights innovations implemented to expand the availability of affordable housing seamlessly in mixed-income communities and neighborhoods using market principles and approaches in administering the subsidy and landlord/tenant relations.

- **Self-Sufficiency** – Highlights a number of initiatives and programs that further promote client self-sufficiency while improving operational efficiency and effectiveness by leveraging MTW Funds, grants and other public/private resources with strategic partners.

- **Corporate Support** – Provides an overview of organization-level operational enhancements that improve AHA's financial and business operations.

Most of the reforms, with the exception of the Local Asset Management Program, exercise the authorizations included in AHA's Restated MTW Agreement Attachment D (Legacy and Community-Specific

Authorizations). The Local Asset Management Program exercises the authority in the First Amendment to AHA's Restated MTW Agreement. Within each reform category is a discussion on innovations or policies developed exercising the authority under AHA's Restated MTW Agreement and highlights one or more of the three MTW Statutory goals. The three MTW Statutory goals are:

MTW Statutory Goal 1:	Increase housing choices for low-income families
MTW Statutory Goal 2:	Reduce costs and achieve greater cost effectiveness in Federal Expenditures
MTW Statutory Goal 3:	Give incentives to families with children where the head of household is working, seeking work or is preparing for work by participating in job training, educational programs, or programs that assist people to obtain employment and become economically self-sufficient

Use of MTW Funds

MTW Agreement Provision: **Attachment D, Section V. – Single Fund Budget with Full Flexibility**
Second Amendment, Section 2. – Use of MTW Funds
Second Amendment, Section 3. – Reinstatement of "Use of MTW Funds" Implementation Protocol

- **Use of MTW Funds –** AHA is able to combine its low income operating subsidy, capital funds and Housing Choice Voucher funds into a single, authority-wide fund, which may be used for MTW Eligible activities as defined in AHA's Restated MTW Agreement and the FY 2010 MTW Annual Plan. AHA may use these funds, for among other things, to expand quality, affordable housing in healthy mixed-income communities, support self-sufficiency programs for Public Housing and Housing Choice-assisted households and to improve its operations (financial and other) (Statutory Goals 1, 2 and 3)

- **Gap Financing –** AHA intends to use its MTW Funds for gap financing to support the financial closings of mixed-income rental communities that serve low-income families (earning less than 80% of area median income) to include Tax Credit, Project Based Rental Assisted-units and Public Housing Assisted-units. Alleviates the challenges in identifying investors and funders for proposed real estate development projects. (Statutory Goals 1 and 2)

- **Use of MTW Funds in Affordable Residential with Private Owners –** Use MTW Funds to invest in residential properties owned by private entities to facilitate the creation of mixed-income communities by supporting the development or rehabilitation of housing units that are affordable to low-income families. Leverages public/private investment to expand quality affordable housing. (Statutory Goals 1 and 2)

Housing Choice Voucher Program

MTW Agreement Provision: Attachment D, Section VII – Establishment of Housing Choice Voucher Program

- **30% of Adjusted Income -** In order to preserve housing affordability for participants of the Housing Choice Voucher Program, the total tenant payment of participants, unless subject to AHA's minimum rent, will be no more than 30% of the household's monthly adjusted income for rent and utilities. Especially important is the fact that this initiative ensures that the financial arrangement of former public housing families who relocated using Housing Choice vouchers will be no different than the financial arrangement they had as public housing residents.(Statutory Goals 1 and 3)

- **Atlanta Payment Standards -** AHA implemented the AHA Payment Standards as an alternative to HUD's Fair Market Rents. A third-party firm with a specialty in real estate market analysis conducted an independent study and identified seven major submarkets in the City of Atlanta. The study team mapped the submarkets and their corresponding market equivalent rent levels in developing the AHA Payment Standards. This reform reduces the barriers Housing Choice participants have in conducting their housing search by providing them with additional financial leverage and improved access to quality housing of their choice in lower poverty neighborhoods with great amenities. (Statutory Goals 1 and 2)

- **Rent Reasonableness –** AHA is developing a more sophisticated and professional and independent rent reasonableness process, which will be managed by AHA's Asset Management Group. The Asset Management Group will develop a database of rents in the various submarkets, review independent market studies and analyze trends in Atlanta market rents so that the information used to assess proposed contract rents will be market based and current. (Statutory Goal 2)
- **Leasing Incentive Fee –** Established to attract landlords and private owners in making housing available to low-income families in healthy mixed income communities. In private markets, owners of Class A real estate often require security deposits and application fees to defray the costs of processing an application for an apartment. In response, AHA designed the Leasing Incentive Fee in order to eliminate these requirements as obstacles. This fee gives families greater leverage in being competitive to secure quality housing in the private market. (Statutory Goals 1)
- **Enhanced Inspection Standards –** Establishes interim and annual inspection "checkpoints" for enforcing both the landlords and participants' responsibility in property upkeep and for re-evaluating neighborhood quality. This supports the need for improved accountability and responsibility of the participant and the landlord and works to improve the image and acceptance of the Housing Choice Program in communities. (Statutory Goals 1, 2, and 3)
- **Section 8 Voucher for Homeownership –** Allows qualified participants in the Housing Choice tenant-based program to use their voucher for mortgage payment assistance. Facilitates participants' upward movement from renting to homeownership. (Statutory Goals 1 and 3)
- **Project Based Rental Assistance (PBRA) Site Based Administration –** Operates as a distinct and separate program from the Housing Choice tenant-based program and moves from the PHA-managed model under the traditional Housing Choice Project Based Voucher Program. Allows AHA to enter into long-term PBRA Agreements with owner entities of quality multifamily rental developments (which include developments for the elderly and persons with disabilities) whose professional management companies have the full responsibility of administering all aspects of PBRA eligibility, admissions and occupancy at the property level.

Atlanta Housing Authority
Moving to Work Reforms and Innovations At-a-Glance

Local Reform of Housing Policies

MTW Agreement Provision: **Attachment D, Section I.O – General Conditions**
Attachment D, Section III. – Occupancy Policies

- **Work/Program Participation Requirement –** This policy, applicable to all AHA-assisted programs, requires that (a) one non-elderly (18 to 61 years old), non-disabled adult household member maintain continuous full-time employment (at least 30 hours per week) and (b) all other non-elderly, non-disabled household members maintain work or participation in a combination of school, job training and/or part-time employment as a condition of the household receiving and maintaining subsidy assistance. This policy reform thwarts the perception that families are not pursuing economic independence and self-sufficiency. (Statutory Goals 2 and 3)

- **$125 Minimum Rent –** This policy raised the minimum rent from $25 to $125 for both the Public Housing and Housing Choice Voucher Programs. This policy does not apply to 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 households will still be responsible for paying rent based on 30% of their monthly adjusted income for rent and utilities or, if a public housing resident and who make the election to do so, the Affordable Fixed Rent. This policy raises standards of responsibility for public housing assisted residents and Housing Choice participants and increases tenant contributions towards rent. (Statutory Goals 2 and 3)

- **Elderly Income Disregard –** Under this policy, if an elderly public housing resident or elderly Housing Choice participant, whose sole source of income is Social Security, SSI, and/or other fixed annuity pension and retirement plan income, becomes employed on a temporary, part-time, or other limited basis which does not result in the discontinuance of the elderly resident's or participant's sole source of annual fixed income, then employment income will be disregarded and not used in calculating annual income. (Statutory Goal 3)

- **Elderly Admissions Preference –** This admissions policy is applicable to public housing-assisted units in communities for elderly (62 years or older), almost elderly (55 to 61 years old) and non-elderly disabled and allows the admission of four elderly or almost elderly applicants from the waiting list before admitting a non-elderly disabled applicant. By creating an optimal mix of elderly, almost elderly and non-elderly disabled residents in a community, this policy addresses the complex social issues associated with mixing the populations. (Statutory Goals 1 and 2)

- **Rent Simplification –** Under this policy, AHA developed AHA Standard Deductions that are higher than HUD's standard deductions for determining adjusted annual income. The significance of this reform is that AHA's Standard Deductions are more generous and equitable because all AHA-assisted families benefit from the policy. This reform also eliminates the need to consider other deductions as a standard procedure but does make provisions for catastrophic hardships. Operationally, the intent of this policy is to reduce errors and the administrative burden associated with the verification of other deductions and dealing with potential fraud. (Statutory Goals 2 and 3)

- **Housing Choice Voucher Homeownership Policy –** This policy allows AHA the flexibility to establish its own procedures and requirements for eligible families to participate in the Housing Choice Homeownership or Homeownership Self-Sufficiency Program. The requirements are aligned to support the long-term success of low-income families achieving their dream of homeownership. (Statutory Goals 1 and 3)

Expanding Housing Opportunities

MTW Agreement Provision:		
	Attachment D, Section V.	– Single Fund Budget with Full Flexibility
	Attachment D, Section VII.	– Establishment of Housing Choice Voucher Program
	Attachment D, Section VII, B.	– Simplification of the Process to Project-Base Section 8 Vouchers
	Attachment D, Section VIII, C.	– Simplification of the Development and Redevelopment Process

- **Revitalization Program –** To further facilitate AHA's development and redevelopment activities with private sector development partners and leverage public and private resources, AHA is able to develop and adopt its own policies and procedures to determine and control major development decisions, to include replacing HUD's Total Development Cost (TDC) limits. This streamlined and simplified process allows AHA to be more nimble and responsive in a dynamic real estate market in the creation or rehabilitation of mixed-income communities. (Statutory Goals 1 and 2)
- **Developing Alternative & Supportive Housing Resources –** Using its single fund budget authority, AHA is able to create or facilitate with private sector developers, service enriched housing for seniors and persons with disabilities. This addresses the lack of affordable, supportive housing to allow these populations to age in place. (Statutory Goals 1 and 2)
- **Quality of Life Initiative –** Enables AHA to relocate families from 12 large, isolated, distressed and obsolete public housing developments to better quality housing in the mainstream. Residents have the opportunity to select living environments that are equipped with desired amenities and neighborhood resources. (Statutory Goals 1, 2 and 3)
- **Project Based Rental Assistance as a Development Tool –** AHA uses PBRA as a financial incentive and financing tool by providing a renewable rental subsidy to private sector developers and owners to commit a percentage of units as affordable in quality multifamily developments. PBRA also enhances developers and owners' competitive applications for the State's Low Income Housing Tax Credits Program for the provision of affordable rental housing. Enables AHA to leverage federal funds with other public and private investment to expand the affordable housing resource. (Statutory Goals 1 and 2)
- **Housing Choice Voucher Program –** AHA established its own Housing Choice Program to facilitate improved housing options for low-income families in better communities and neighborhoods. Works to improve the quality of "choice" for families in low-poverty and mixed-income environments. (Statutory Goals 1 and 3)

Self Sufficiency

MTW Agreement Provision: **Attachment D, Section IV. – Self-sufficiency/supportive services**
Attachment D, Section V. – Single Fund Budget with Full Flexibility

- **Work/Program Participation Requirement –** As stated in the policy, requires adults between the ages of 18-61 years (non-elderly, non-disabled) in both the Public Housing and Housing Choice Programs to be working, in school or in a training program to continue receiving subsidy assistance from AHA. Builds on tenant personal responsibility and accountability. This benchmark has illustrated how families, using their own human potential are improving their lives, becoming financially independent and increasing their contribution toward rent. (Statutory Goals 2 and 3)
- **Human Development and Support Services –** Provide professional individualized coaching and counseling services to families impacted by revitalization and QLI relocation activities and assist clients who are non-compliant with the work/program participation requirement. AHA uses MTW Funds and HOPE VI funds to pay for these vital services to families in both the Public Housing and Housing Choice Programs. (Statutory Goal 3)
- **Good Neighbor Program –** Instructional Program established by AHA and taught by Georgia State University that provides curriculum based training on the roles and responsibilities of being a good neighbor. Leverages MTW Funds with Georgia State University resources to support the implementation of this training. (Statutory Goals 2 and 3)
- **Service Provider Network –** An established network of service providers that facilitates families' work and self-sufficiency goals and supports families in meeting the work/program participation requirement. Leverages MTW Funds with resources from established organizations with proven track records to support incremental costs associated with serving AHA-assisted households. (Statutory Goals 2 and 3)
- **Rapid Response Foreclosure Team –** Use of MTW Funds to establish a team of AHA professionals that proactively respond to Housing Choice participants impacted by property owner foreclosures or other emergencies, natural disasters or property abatement. The team provides a continuum of support leading to the resettlement of impacted families into a new living environment. Also, creates operational efficiencies by establishing process, procedures and protocols to improve response times in handling these time-sensitive requests. (Statutory Goal 2)
- **Place-based Supportive Services Strategy Pilot –** AHA in collaboration with the Atlanta Regional Commission and other partners are leveraging grant funds, MTW Funds and other resources to create a service-enriched living environment for seniors and persons with disabilities in targeted high-rise communities using the NORC (Naturally Occurring Retirement Community) model. Based on the best practices derived from the pilot, AHA will use as a model in implementing in other senior high-rise communities. (Statutory Goal 2)
- **Comprehensive Homeownership –** AHA is able to establish its own policies, procedures, eligibility and participation requirements for its homeownership programs, to include changes to HUD's Family Self-Sufficiency Program requirements. This program is designed to prepare eligible participants in becoming successful home owners. (Statutory Goals 2 and 3)

Corporate Support

MTW Agreement Provision:		
	Attachment D, Section V.	– Single Fund Budget with Full Flexibility
	Attachment D, Section VII., C.	– Demonstration Program on Project-based Financing
	First Amendment, Section 6	– Local Asset Management Within MTW

- **Maximizing the Power of Technology –** AHA will use its MTW Funds to link its information technology, financial, procurement, data and its business system infrastructure into an integrated data-centric environment. This overarching strategy will improve AHA's ability to use data as intelligence to inform and improve its business decisions. AHA will create a comprehensive, integrated and relational database that will empower the organization to be more strategically focused on business systems integration and the corresponding linkages that will make AHA a 21st Century real estate business enterprise. (Statutory Goal 2)

- **Sustaining Mixed-Income Investments –** To sustain and preserve investments in mixed-income communities, AHA will use its authority under the Restated MTW Agreement to substitute the public housing operating subsidy at AHA-sponsored mixed-income, mixed-finance communities for renewable Project Based Rental Assistance. This initiative will support the long-term sustainability, economic viability and market competitiveness of the AHA-sponsored mixed-income communities. (Statutory Goal 2)

- **Innovative Subsidy Strategies –** Sustains viability of AHA's longer-term hold Affordable communities by substituting the Section 9 operating subsidy for renewable Project Based Rental Assistance. Similar to the investment strategy above, AHA will be able to design and implement a financing strategy to leverage private resources to continue to improve the physical structures and quality of the environment. (Statutory Goal 2)

- **Local Asset Management Program –** Defines how AHA has designed its local asset management program, including project-based property management, budgeting, accounting and financial management of AHA-owned public housing assisted properties and public housing assisted units in mixed-income communities, and the other aspects of its business operations, based on AHA's Business Plan. AHA's Local Asset Management Program is more comprehensive in scope than HUD's asset management requirements. (Statutory Goal 2)

"Home is a place - that state of mind - providing sanctuary and comfort inside a world that is yours to share and enjoy with those you love."

*** Mark Kemp***

PART I:

INNOVATIVE AND CREATIVE USE OF MTW FUNDS

On January 16, 2009, AHA and HUD executed a second amendment to AHA's Amended and Restated Agreement to reaffirm and clarify AHA's use of MTW Funds.

The second amendment reinstates AHA's ability to invest MTW Funds in real estate transactions pursuant to its "Use of MTW Funds" Implementation Protocol and reaffirms that AHA's MTW Funds may be used for MTW Eligible Activities as defined in the Restated MTW Agreement. The second amendment further acknowledges that AHA's use of combined public housing operating capital funds and voucher program funds (collectively, "MTW Funds") is not restricted in either AHA's Original MTW Agreement or in AHA's Amended and Restated Agreement to those uses specified in *Sections 8* and *9* of the U.S. Housing Act of 1937, as amended.

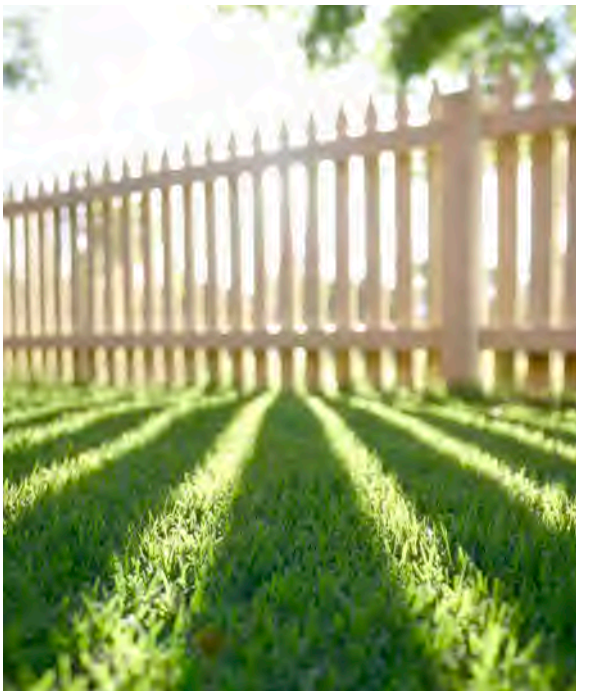
As part of its FY 2010 priority activities, given the softness in the real estate and financial markets, AHA and its private sector real estate development partners, like all real estate firms, are finding it challenging to identify investors and funders willing to invest in proposed real estate development projects. In order to meet this challenge, as part of its FY 2010 priorities, AHA intends to use its MTW Funds to provide Gap funding that supports the financial closings of mixed-income rental communities that serve persons eligible (i.e. households earning less than 80 percent of area median income) for Tax Credit, Project Based Rental Assisted units and Public Housing Assisted Units; and that further carry out the on-going priorities and initiatives outlined in this Plan.

Set forth below is an overview of the current market conditions and how AHA intends to use its MTW Funds to provide Gap funding needed to advance AHA's Revitalization Program. Although the discussion is specific to certain developments, AHA will apply this conceptual approach to other mixed-income developments.

Use of MTW Funds for Development

AHA and its private sector development partners are working to close four mixed-income, mixed-finance transactions to advance the revitalization plans for each of Harris Homes and Grady Homes. Two of these transactions have been awarded 2007 9% low income housing tax credits, which would normally require that units be placed in service by the end of 2009: Ashley CollegeTown II (Harris HOPE VI Phase V) and Ashley Auburn Pointe I (Grady HOPE VI Phase III). Both transactions were scheduled to close in 2008, but the equity investor withdrew shortly before closing. AHA and its private sector development partner are continuing to identify a replacement

- Utilizing MTW Funds to fill the gap created by lower tax credit pricing to the extent that it cannot be filled by DCA TCAP funds. These funds will be provided on a pro rata basis established by the percentage of affordable units (public housing-assisted and/or PBRA-assisted and other tax credit).



“I love my home because it’s wonderful.
I have my own space and my kids get to run around in my big back yard.
My home means to me safety, love, respect and togetherness.”
⁎ Vonda Mosley ⁎

PART II:
REVITALIZATION PROGRAM

The FY 2010 MTW Implementation Plan will continue to focus on repositioning all of its conventional public housing developments into market-rate, mixed-use, mixed-income communities. For the last 12 years, AHA and its private sector development partners have continued to evolve AHA's mixed-income, mixed-finance development model that creates market rate communities, with a seamless affordable component. Such communities are owned by public/private partnerships.

The two critical components of the Revitalization Program are the real estate component and the human development component. The goal of the real estate component is for AHA, in partnership with excellent private sector developers, to create healthy and economically sustainable market rate quality mixed-use, mixed-income communities. The goal of the human development component is to promote, through partnerships with excellent human development firms, economically independent families, educated youth, and healthy, self-sufficient elderly and disabled persons. This section of the Plan relates to the real estate development component; while the Human Development section of this Plan covers those activities that support successful outcomes for families.

Repositioning AHA's public housing developments may involve any one or a combination of the following strategies: (1) major revitalization using HUD funds as seed capital and AHA-owned land, as equity, to attract private sector developer participation and private investment; (2) major revitalization using Project Based Rental Assistance and the value of AHA-owned land as equity to attract private sector developer participation and private investment; (3) sale of AHA-owned land (including land swaps); (4) land banking; and/or (5) acquisitions.

AHA will also continue to enhance its Comprehensive Homeownership Program to assist families in achieving their goals of financial independence and homeownership.

Recognizing the dynamic Atlanta real estate market, AHA will consider and pursue, when appropriate, any attractive opportunity that furthers AHA's strategies, goals and objectives. Because AHA's Revitalization Program is focused on "community building," the scope of the Program is beyond housing. It also includes high performing neighborhood schools, high quality retail and commercial development, green space and other quality of life amenities that make great neighborhoods.

AHA is also looking to substantially upgrade and improve the longer-term public

housing developments, which could, where necessary and feasible, involve Revitalization, disposition, demolition, voluntarily conversion or substitution of the type of subsidy of one or more of such developments. AHA may also demolish or dispose of properties for other valid business reasons not associated with its repositioning strategies including, but not limited to, the need to address life, safety and health issues.

All of AHA's longer-term hold conventional public housing-assisted properties are potential candidates for innovative subsidy strategies, rent restructuring or full or partial demolition or disposition in FY 2010. A list of such properties can be found in ***Appendix F***, which includes properties undergoing revitalization. In addition, AHA will, if necessary and feasible, acquire improved or unimproved real estate in its jurisdiction in order to facilitate its revitalization program, support the creation of mixed-use, mixed-income housing opportunities, and support local revitalization initiatives to stabilize local neighborhoods. A listing of properties acquired by AHA is also included under ***Appendix F***.

Real Estate Development and Acquisitions (REDA), which is comprised of Real Estate Development, Real Estate Development Transactions, Homeownership, PBRA Development and Financial Operations, working collaboratively with the Finance, Legal, Asset Management, Intergovernmental Relations, Relocation, Human Development and Real Estate Management Departments, (a) facilitates the repositioning of AHA's distressed public housing communities to mixed-use, mixed-income communities in partnership with private sector developers; (b) manages AHA's revitalization and development grants and contract administration responsibilities; (c) interfaces with public and quasi-public bodies such as City of Atlanta, Atlanta Development Authority, Atlanta Public Schools and Georgia Department of Community Affairs as it relates to redevelopment activities; (d) facilitates the financing mechanisms for the development deals with private sector developers and tax credit equity partners; and (e) manages the front-end development relationship with private developers and owners utilizing AHA's Project Based Rental Assistance Program.

Significance of MTW

The work under the Revitalization Program priority supports the MTW Statutory goal to expand housing opportunities for low-income families while further supporting AHA's vision of "Healthy Mixed-Income Communities". Through its Revitalization Program, AHA is addressing the City of Atlanta's need for additional high quality affordable housing in sustainable and economically integrated environments.

The Restated MTW Agreement has enabled AHA, in partnership with its private sector development partners, to be more responsive and nimble in taking advantage of the dynamic real estate market in metropolitan Atlanta. Using such authorizations, AHA has been able to invest MTW Funds in development deals, which include acquisition, new construction, rehabilitation, demolition, site improvement and the development

of commercial facilities; has established its own PBRA program; and has established a streamlined development process. The Restated MTW Agreement also allows AHA to pass on the least restrictive statutory and regulatory requirements as set forth in its Restated MTW Agreement to its strategic partners and providers. Further, AHA has been able to use its authority under its Restated MTW Agreement to redesign HUD's Family Self-Sufficiency Program so that it works more effectively for the participants.

MTW Implementation Protocols – The following three MTW Implementation Protocols have been developed that further articulate the process or methodology AHA will use to further its Business Plan activities and the work of REDA.

Fee-for-Service Methodology – AHA established a fee-for-service methodology for allocating costs to HUD grants and programs for administration and overhead. This approach allows AHA to charge each property, program or grant a fixed fee for administration and corporate costs replacing the cumbersome salary allocation systems traditionally found in public housing agencies. AHA is able to apply the use of this protocol for mixed-finance/HOPE VI projects and other HUD grants and programs. This protocol has been approved by HUD and is included by reference in the Implementation Protocol Updated Reference Chart found in ***Appendix O*** of this Plan.

Identity of Interest – This Protocol permits streamlined submission and self-certification by AHA in lieu of obtaining an Identity of Interest waiver from HUD when an affiliate of AHA's procured development partner is the general contractor for a mixed-finance project. This Protocol has also been approved by HUD and is included by reference in the Implementation Protocol Updated Reference Chart found in ***Appendix O*** of this Plan.

Replacement Housing Factor (RHF) Funds – This Protocol outlines the process pursuant to which AHA manages and utilizes RHF funds. In FY 2007, AHA submitted to HUD its RHF Plan which accumulated RHF awards from Federal Fiscal Years 2003-2007. These funds will be used to support the revitalization of Grady Homes and McDaniel Glenn.

AHA intends to submit a revised RHF Plan to HUD during its 4th quarter of FY 2009 in order to use such funds to advance the Harris Homes revitalization. During its 2008 Fiscal Year, AHA submitted to HUD a plan for second tier RHF Funds received in HUD Funding Year 2008 which provides the plans to further advance AHA's revitalization activities. AHA also developed and submitted to HUD for review and approval a Replacement Housing Factor – Obligation and Expenditure Implementation Protocol which is also included in this Plan submission under ***Appendix O***.

development of housing in which the elderly and young mentally disabled can live independently. During AHA's 2006 and 2007 Fiscal Years, Designated Housing Plans were submitted to, and approved by HUD, for Columbia Senior Residences at Mechanicsville and John O. Chiles high-rise main building and John O. Chiles Annex, respectively.

The development of Columbia Senior Residences as an *Elderly Only* facility is part of the McDaniel Glenn Revitalization Plan. This new senior development was completed in December 2008 and offers 155 independent living units for the elderly. The revitalization of John O. Chiles and Annex is part of the Harris Homes Revitalization Plan. AHA and its private sector development partners have comprehensively renovated the John O. Chiles main building to market rate quality standards and now provides 190 independent living units exclusively for elderly persons. The Annex is designated as *Disabled Only* supportive services housing and when completed in the 4th quarter of FY 2009 will offer 26 units of service enriched-housing for persons with mental and developmental disabilities. The John O. Chiles Annex will serve as a pilot program to develop best practices for service-enriched supportive housing.

John O. Chiles Annex Supportive Housing Pilot – In collaboration with the Integral Group, this pilot program will provide comprehensive intensive supportive services targeted to populations with developmental and mental disabilities who struggle to retain stable housing. By providing people with special needs a way to connect to various in-home services and resources, one of the goals will be to reduce instances where such individuals will require emergency public services. Residents will be assisted with establishing and maintaining connections to their service providers within the community and will have the benefit of staff that will coordinate the following services:

- Assistance with housekeeping and laundry services
- Medication reminders and/or help with medications
- Securing assistance with "Activities of Daily Living" (ADLs) including personal care, and meals
- Transportation
- Health monitoring
- Care / Case management
- Social and therapeutic activities and recreation
- Appropriately trained security

The goals and objectives for the revitalized John O. Chiles Annex supportive housing pilot will be the integration of persons with mental and developmental into the larger community, enhancing the ability of such persons to live independently, accessibility to needed services, and affordability.

Affordable Assisted Living Demonstration – During FY 2008, AHA began exploring strategies for developing affordable assisted living opportunities for low-income seniors and persons with disabilities. These strategies included examining ways to leverage resources with Medicaid waivers or other service funding and exploring ways to use Section 8 project-based rental assistance, Low Income Housing Tax Credits and other financial resources to create affordable assisted living models at AHA-sponsored mixed-income communities. During FY 2010, AHA will utilize a skilled and knowledgeable procured contractor to assist AHA with moving this demonstration forward.

QLI Redevelopment – As described under the Quality of Life Initiative after families have successfully relocated from the QLI properties, AHA will demolish the existing structures and conduct a competitive procurement process to engage private sector developers to develop mixed-use, mixed-income communities on the vacated sites. If AHA determines to sell all or a portion of the vacated sites, the sale proceeds will be used to further AHA's mission and vision. All of the Phase I properties under QLI have been demolished (See the *Quality of Life Initiative* section of this Plan for the listing of Phase I communities). During AHA's 2009 and 2010 Fiscal Years, AHA will establish the development and financial goals and objectives and a prioritization schedule for all the QLI-impacted properties. The timing of the request for proposals will be driven by the conditions in the Atlanta real estate and financial markets.

Re-occupancy Process – During FY 2010, AHA will continue conducting the re-occupancy relocation of households returning to revitalized communities. In support of this, AHA will improve the functionality and reporting of the Consolidated Relocation Management System (CRMS) allowing REDA and Relocation staff to more accurately and effectively track re-occupancy residents.

Comprehensive Homeownership Program

During FY 2010, AHA will continue implementing its Comprehensive Homeownership Program which facilitates low to moderate income families in becoming successful homeowners and develops affordable homeownership opportunities in healthy, mixed-income communities utilizing three different approaches.

West Highlands – Single Family Homes

HOPE VI Homeownership Down Payment Assistance – An objective of the HOPE VI Homeownership Program is to provide a subordinate loan to low and moderate income first-time home buyers to reduce the principal amount of the first mortgage and thus, reduce their monthly housing costs so they can qualify for a private mortgage.

Eligible participants must undergo a rigorous review that is designed to evaluate a participant's preparedness in successfully purchasing and owning a home. The initial screening for the Comprehensive Homeownership program requires that qualified applicants meet the following criteria:

- Household income must be at or below 80 - 115% of Metropolitan Area Median Income, depending on the HOPE VI grant being utilized
- Applicants must not have owned a home within the last 18 months [1]
- Applicants must attend homebuyer's education classes
- The applicant should provide minimum down payment of 3% with no less than $1,000 from buyers own funds
- Be able to verify a minimum of two (2) months PITI (principal, interest, taxes and insurance) cash reserves after closing
- Debt-to-income ratio should not exceed 46%
- Loan-to-value ratio should not exceed 100%
- The applicant must occupy the home as their primary residence

Homebuyer readiness is gauged using an evaluation process that serves as a barometer against the lender's requirements. AHA has an internal Loan Review Committee, who examines the proposed buyer's information and makes recommendations on approval (or denial) of subsidy assistance.

Given the adverse conditions in the housing and financial markets, homeownership development tied to AHA's revitalization activities are being re-evaluated and may be restructured as discussed earlier in this Section.

Housing Choice Voucher Homeownership Mortgage Payment Assistance Program – The Housing Choice Voucher Homeownership Program began in 2002 with the first loan closing occurring in 2003. During the six years this program has been active, AHA has provided mortgage payment assistance to 81 Housing Choice clients.

During FY 2008, AHA began to re-structure its policies, procedures and implementation of the Housing Choice Voucher Homeownership Program. The program is being re-engineered with new eligibility benchmark criteria established for participants, new underwriting criteria, and the establishment of a Mortgage Payment Assistance Review Committee, which will evaluate and assess new participants' financial ability to become a homeowner. AHA has also taken care to carefully

[1] AHA's definition for "first-time" homebuyers.

modify some of the HCV Homeownership policies to raise its standards to improve long-term success. Implementation of the re-structured program will be fully launched during the 4th quarter of FY 2009.

Homeownership/ Self-Sufficiency – During FY 2008, AHA began re-engineering the former HUD Family Self-Sufficiency (FSS) Program developing a new, locally designed and simplified FSS Program, utilizing the authority under AHA's Restated MTW Agreement. This program is now referred to as Homeownership Self-Sufficiency (HSS) and is a component of AHA's Comprehensive Homeownership Program.

One policy modification completed in FY 2009 was the development of a Housing Choice Homeownership Program Policy Statement in the Statement of Housing Choice Policies (See ***Appendix Q***, Part XVI of this Policy document). Consistent with this Policy Statement, participants who qualified, were allowed additional time (longer than the traditional FSS program requirements) to continue to participate in the Program.

AHA's newly minted HSS program provides comprehensive support and case management for 19 HSS families in the areas of financial literary and employment counseling.

The HSS families currently have escrow account balances that range from approximately $200 - $36,000; from which funds are disbursed upon attainment of homeownership or other self sufficiency goals. Additionally, the HSS Program has utilized escrow funds to assist HSS families with financial literacy, credit repair, job training, educational, and hardship purposes. In FY 2010, AHA will continue to work with these 19 participants to assist them in attaining financial independence and self sufficiency and to purchase a home, if desirable and feasible.

“Home means a dream. I never thought I could have my own home, but, once I got into the program and relocated, I found my home and now I am happy – because it is mine!”

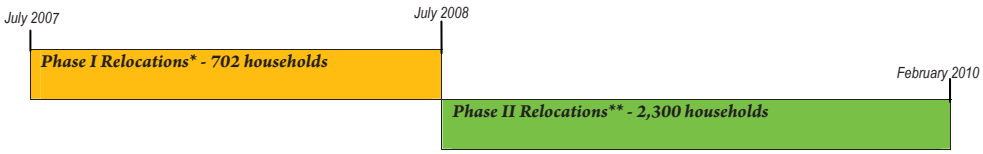
∗Sonya Wright∗

PART III:

QUALITY OF LIFE INITIATIVE

Initiated in FY 2007, AHA's Quality of Life Initiative (QLI) was designed to empower households in 12 AHA-owned obsolete and distressed public housing developments to relocate to higher quality, lesser impacted communities primarily using tenant based housing choice vouchers. The 12 targeted developments under QLI include 10 family communities- Bankhead Courts, Bowen Homes, Englewood Manor, Herndon Homes, Hollywood Courts, Jonesboro North, Jonesboro South, Leila Valley, Thomasville Heights and U-Rescue Villa and two senior developments- Palmer House and Roosevelt House. HUD has approved the demolition applications for all 12 developments. After relocation has been successfully completed, AHA will demolish the buildings and related infrastructure. Subject to conditions in the real estate and financial markets, AHA will solicit developers and investors, through a competitive process, for proposals to develop mixed-use, mixed-income communities on the sites.

Upon completion of the relocation phases of QLI, approximately 3,000 families will have successfully relocated as highlighted below:



***Phase I Relocations:** *Englewood Manor, Jonesboro North, Jonesboro South, Leila Valley and U-Rescue Villa*

****Phase II Relocations:** *Bankhead Courts, Bowen Homes, Herndon Homes, Hollywood Court, Palmer House, Roosevelt House, and Thomasville Heights*

Since beginning Phase I of QLI relocations in early FY 2008, all eligible households have successfully relocated to better quality living environments, with 69% of those households choosing to remain in the city of Atlanta. Demolition of the five Phase I QLI properties has been successfully completed. During FY 2009, after receipt of all required HUD approvals, AHA began implementing Phase II of the QLI relocations which will continue into FY 2010, with completion scheduled well before June 30, 2010. When Phase II of the QLI relocation is completed, AHA will no longer own or operate any large family public housing developments; thereby ending the era of warehousing low-income families in isolated distressed and obsolete public housing projects. ***Appendix J*** provides a QLI fact sheet which includes the percentage of the Phase II relocations completed (by community) at the date of this Plan.

Responsible Relocation – AHA's collaborative multi-departmental relocation team will continue providing families with the tools to make informed choices about the best housing opportunities for their family. Such opportunities include transfers to longer-term hold AHA high-rise communities (for seniors and disabled residents); moving to privately owned mixed-income rental communities which have AHA Project Based Rental Assistance for a specified percentage of the units; and utilization of tenant based vouchers in the location of their choice. The multi-departmental relocation team works to facilitate a seamless process for relocating clients as it relates to identifying quality living environments, timely property inspections, Resident Tenancy Approvals (RTAs), Housing Assistance Payments (HAP) processing, and the provision of moving and other assistance and support. AHA will also continue to improve the functionality of its Consolidated Relocation Management System (CRMS) to enhance relocation staff and client tracking and reporting.

"I love my home because it's warm and loving and it's our castle."
∗ Vonda Mosley ∗

PART IV:

PROJECT BASED RENTAL ASSISTANCE AS A DEVELOPMENT TOOL

During FY 2010, AHA will continue its Project Based Rental Assistance (PBRA) priority initiative to expand the availability of quality, affordable housing in healthy mixed-income communities in metro-Atlanta. The goals for this initiative are to facilitate (a) housing opportunities for families in healthy mixed-income communities; (b) development of housing for the elderly; (c) development of supportive services housing for disabled persons and other transitional housing; and (d) the expansion of housing opportunities in areas of low poverty. PBRA helps to achieve these goals through a long-term contractual arrangement with private sector owners by agreeing to provide for up to ten years a rental subsidy to an agreed percentage of units in upscale multifamily rental developments. Rental Subsidy makes those rental units affordable to income eligible households, including families, elderly persons and persons with disabilities. Unlike the Housing Choice tenant-based voucher program where the rental subsidy follows the voucher holder in the event they should move, PBRA stays with the property ensuring the affordability of rental units and fostering the sustainability of the multifamily development over the term of the PBRA agreement.

Using a competitive process to ensure the quality of PBRA projects, AHA issues a request for proposals (RFP) from experienced developers/owners of multi-family rental developments. For those proposals chosen in accordance with the PBRA selection criteria, AHA issues a conditional PBRA commitment to the developer/owner. Upon delivery of the project in accordance with the approved proposal and the terms and conditions of the PBRA commitment, AHA and the developer/owner enter into a long-term (for a period up to 10 years as stipulated by AHA in the RFP) PBRA agreement. The PBRA agreement may be renewed by AHA if certain conditions are met.

The property types considered in the PBRA program include:

New Construction: Properties defined as new construction are those in which a conceptual design has been developed but no construction has commenced;

Rehabilitation: Properties defined as "substantial rehabilitation" are existing properties in which the average per unit rehabilitation hard costs equals or exceeds $20,000

for properties 20 years old or less and the average per unit rehabilitation hard costs equals or exceeds $25,000 for properties that exceed 20 years old.

Existing: Properties defined as Existing are high quality multifamily developments that are well-maintained requiring no additional rehabilitation, professionally managed and were either (a) constructed within 10 years of the date of the RFP, and meet all of AHA's inspection, accessibility and site and neighborhood standards; (b) constructed over 10 years but within 20 years before the date of the RFP, have been substantially rehabilitated within the past five years with average rehabilitation hard costs equal to or greater than $20,000 per unit and meet all of AHA's inspection, accessibility and site and neighborhood standards; and (c) constructed over 20 years before the date of the RFP, have been substantially rehabilitated within the past five years with average rehabilitation hard costs equal to or greater than $25,000 per unit and meet all of AHA's inspection, accessibility and site and neighborhood standards.

The PBRA program is managed by AHA's Real Estate Development and Acquisitions Division (REDA) during solicitation and development phases and by the Asset Management after construction completion and the properties enter the operating phase. Among other things, REDA manages all aspects of the prospective developer/owner relationship leading up to the execution of the PBRA Agreement. This includes the PBRA solicitation and evaluation process; monitoring of any development or rehabilitation activities at the proposed property; reviews of the financing structure that supports the development to include subsidy layering reviews; and issuance of a Commitment Letter for PBRA assistance once AHA's Board approves the project. The commitment letter evidences AHA's intent to provide rental assistance to the property once agreed upon conditions have been met.

REDA works closely with the Asset Management Division with respect to coordination of market rent reviews and stabilization tasks relating to permanent loan phase conversion and associated fees (as applicable), the establishment of site-based administration and the training of property management staff. At the point AHA is ready to execute a PBRA agreement with the owner entity, the relationship is turned over to the Asset Management Division. The Asset Management Division oversees the execution of the PBRA agreement between AHA and the owner entity, which documents the terms and conditions of the PBRA arrangement, including the on-going requirements for PBRA site-based administration. (See Section *Asset Management priority* for more information on PBRA site-based administration).

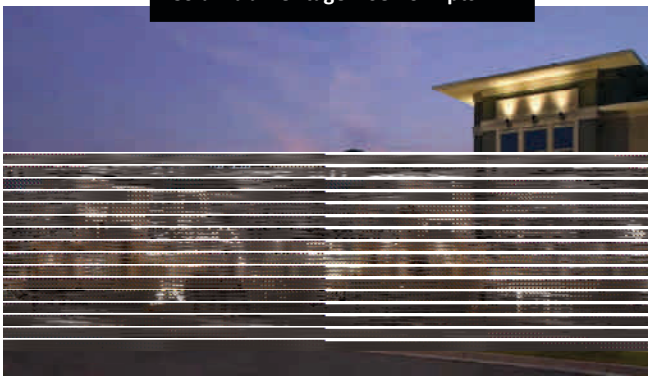
Significance of MTW

Using its Restated MTW Agreement authorizations, AHA has designed its own PBRA program, with the goal of making the program attractive to the local Atlanta real estate development professionals. Leveraging its MTW authority, AHA has been able to use PBRA as an incentive for the development of quality affordable housing in mixed-income communites as stated in the goals above; establish contract rents based on third party market rent studies approved by AHA removing fixed payment standards as a consideration; develop its own site and neighborhood standards; exceed the limitation on the percentage of Housing Choice Voucher funding that can be utilized for PBRA; and decentralize the administration of the program through site-based administration of PBRA by the owners, through their private management company professionals at the property.

AHA will continue to use its Restated MTW Agreement authority during FY 2010 to further develop and enhance its PBRA program and will implement activities and develop processes and procedures consistent with this authority and as changes in the local housing market, financial conditions, developer property owner participation dictates.

Supporting Activities

During FY 2010, AHA will be continuing the following activities as part of the implementation of this major priority.


Columbia Heritage – Senior Apts.

Project Based Rental Assistance inside of Mixed Income Communities – Through a competitive process, AHA will solicit private developers and owners interested in reserving a percentage of their multi-family rental units for at least ten years through AHA's PBRA program. Commitments for PBRA may be extended after the 10-year term after meeting agreed upon conditions. AHA has over 3,500 multi-family units either committed or under PBRA Agreements with private owners to provide housing for families, seniors and persons with special needs. AHA will continue to use this strategy to expand the availability of quality affordable housing in healthy, mixed-income communities.

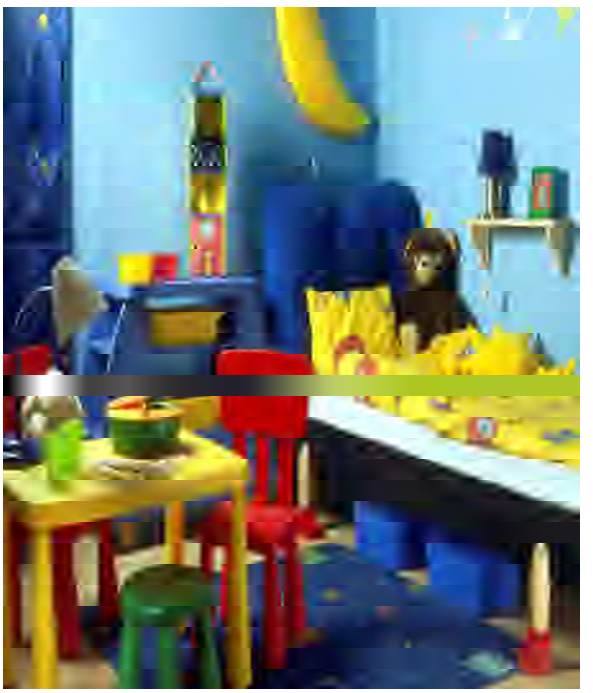
Project Based Rental Assistance Regional Expansion Program – AHA will continue to negotiate Intergovernmental Agreements with various PHAs or local governments in the Atlanta metropolitan area, sub-

ject to the provisions of State law, to permit site-based administration of AHA's PBRA Program in those jurisdictions. AHA administers PBRA within the City of Atlanta limits (AHA's jurisdiction) and may provide PBRA assistance to properties in adjacent jurisdictions, provided an Intergovernmental Agreement is entered thereby authorizing AHA to administer PBRA within that jurisdiction.

Project Based Rental Assistance Special Needs Demonstration Program – In support of the Mayor's Regional Commission on Homelessness, whose goal is to end homelessness in the City of Atlanta, AHA has established a Homeless Demonstration Program in collaboration with United Way of Metropolitan Atlanta, Inc. that utilizes PBRA to facilitate the development of supportive services housing for homeless persons by private sector developers. Under this demonstration, AHA will solicit proposals from owners for PBRA who can ensure the delivery of supportive services to the homeless residing in their properties. PBRA commitments with developers/owners are made for a term consistent with the period that funding for supportive services are in place.

At June 30, 2008 there were 275 units under PBRA agreement and another 116 units committed. During FY 2010, AHA will continue to solicit proposals from housing providers who have partnered with United Way-approved service providers for the delivery of supportive services.

AHA will continue soliciting proposals from developers/owners of multifamily developments that provide housing to persons with mental health disabilities who can provide evidence of a supportive services agreement with a United Way-approved service provider. At June 30, 2008, AHA had 93 PBRA-assisted units under commitment serving this population.



"I love my home because it's filled with love, laughter and appreciation of my kids."

Tracie Rander

PART V:

RE-ENGINEERING THE HOUSING CHOICE VOUCHER PROGRAM

During FY 2010, AHA will continue the transformation of its Housing Choice Tenant Based Voucher Program into a world class operation focusing on the goals of identifying quality affordable housing opportunities in healthy neighborhoods; streamlining its internal business processes and systems, operations and service delivery utilizing its Moving To Work flexibility to reduce the financial and administrative burden of managing the program; creating incentives for families to achieve and maintain economic independence, improved quality of life and self-sufficiency; and, developing greater acceptance of the program in Atlanta communities and neighborhoods. AHA is also working to expand its relationship with the private market through creative outreach to Landlords, with the goals of improving the quality of the product for AHA clients, improving customer relations and increasing accountability with Participants and Landlord/Property Owners. Just as AHA has changed the face of affordable housing, Housing Choice must also undergo a transition to private sector principles and the operational discipline necessary to enhance the long-term sustainability of the program.

Significance of MTW

As a core guiding principle, AHA believes that families using housing choice vouchers must not move from "vertical ghettos" to "horizontal ghettos." With the authority under its Restated MTW Agreement, AHA has been able to design and implement reforms to its Housing Choice Voucher Program so that income eligible families can use housing choice vouchers to live in lower poverty, opportunity-enriched neighborhoods, while continuing to pay no more than 30% of their adjusted income towards rent and utilities. These reforms are listed in the Executive Summary to the Plan and discussed in greater detail in this Section.

Under its Restated MTW Agreement, AHA is able to establish its own Housing Choice Voucher Program using innovation to determine program components such as reasonable contract rents and increases, lease length and reissuance policies, inspections standards, waiting list procedures, rent reasonableness and adjustments to the housing assistance payment. AHA can also revise its programs, services and terms available to landlords and other housing authorities to insure availability of affordable, high quality units for its participants. AHA's Single Fund Budget allows Housing Choice to further

advance its work in terms of improved resource allocation for departmental operations, enhanced technology-based solutions that improve internal processes and service delivery to clients and expanded marketing capabilities, incentives and resources to attract and retain relationships with highly experienced Landlords. AHA is also able to enforce higher accountability and responsibility in clients' participation in work and self-sufficiency programs and allocate funding for the provision of self-sufficiency programs and activities that further educate and empower participants. In addition to implementing new reforms which promote client self-sufficiency and improved quality of life, AHA is also implementing the following reform initiatives in establishing its Housing Choice program in order to address issues in the local Atlanta market:

30% of Adjusted Income – To resolve the affordability issue that allows families newly admitted into the Housing Choice program and those who are moving to new units to pay up to 40% of their adjusted income for rent and utilities for the initial lease term and to pay an even higher percentage of adjusted income upon renewal, AHA created the 30% of Adjusted Income initiative using its authority under its Restated MTW Agreement to stabilize total tenant payments in recognition of the financially fragile situation of low income families. In order to preserve housing affordability for participants of the Housing Choice program, the total tenant payment of participants, unless subject to AHA's minimum rent, will be no more than 30% of the house hold's monthly adjusted income for rent and utilities. Especially important is the fact that this initiative ensures that the financial arrangement of former public housing families who relocated through the Housing Choice program will be no different than the financial arrangement they had as public housing residents. This initiative provides stability for all Housing Choice participants by setting the total tenant payment in line with family expectations and affords participants with further opportunities to progress to better neighborhoods of their choice.

AHA Payment Standards – AHA identified the limitations that HUD's Fair Market Rents placed on AHA's ability to maximize the use of the Housing Choice program to support strategies that promote the deconcentration of poverty, expand and broaden affordable rental housing opportunities, enhance opportunities for the development of affordable rental housing and provide better access to alternative housing that support the needs of the elderly and persons with disabilities. Using its authority under its Restated MTW Agreement, AHA conducted an analysis of the submarkets in the City of Atlanta and the equivalent market rents in those submarkets in order to develop and implement the AHA Payment Standards.

The AHA Payment Standards, updated annually, are based on data derived from a variety of resources including, but not limited to, market rent studies (whether conducted by Atlanta Housing Authority or other public or private entities), HUD Fair Market Rent data for Atlanta and/or other comparable metropolitan markets, private sector databases, academic and other empirical studies, and regional eco-

nomic forecasts. The AHA Payment Standards replace the HUD Fair Market Rents thus eliminating the financial barriers families have in conducting their housing search. This initiative combined with the 30% of Adjusted Income initiative provide Housing Choice participants with additional financial leverage to broaden their ability to lease affordable, quality housing of their choice in great neighborhoods.

Rent Reasonableness – AHA intentionally moved the approval of Housing Choice contract rents from Housing Choice Operations to the Asset Management Division. As a process improvement measure, moving Housing Choice contract rent negotiations and determinations away from Housing Choice Operations, the managers of all ongoing landlord relationships, adds a higher level of internal controls and takes advantage of internal expertise. AHA believes that rent reasonableness determinations of rental housing units leased under the Housing Choice program must be thoughtful and in line with market equivalent rents for the market area of any assisted unit. AHA also believes that professionals with the requisite real estate expertise should be making the final determination with respect to Housing Choice contract rents. To make such determinations, Asset Management will be relying on its own analysis of quality market data and research outputs on leased units that have been independently verified, reviewed and analyzed by an external third-party firm with a national presence with local data collection and due diligence capacity.

These due diligence processes are essential and critical elements supporting the accuracy and integrity of rent reasonableness determinations. To improve AHA's rent reasonableness determinations, AHA will establish a web-based rent reasonableness system that will incorporate the best of three components; relationship management in Housing Choice Operations, internal real estate analytics and market rent expertise in the Asset Management Division and the external capacity of a firm driven by its due diligence processes to provide validated, quality market data. The value added outcome will be the consistency and stabilization of Housing Choice contract rents in line with the rental market.

Leasing Incentive Fee (LIF) – AHA established the Leasing Incentive Fee to streamline the leasing process and provide an incentive to landlords and private owners to offer quality, rental housing in great neighborhoods to low income families. Used primarily in the past as a relocation strategy, during FY 2010, AHA will expand the use of the LIF to provide additional support to Housing Choice participants in their choices to move to low poverty areas as determined by AHA. The LIF will afford Housing Choice families the opportunity to exercise their choice to move into quality, rental housing in low poverty areas.

Enhanced Inspection Standards – AHA is continuing to re-engineer its Housing Choice Inspections Standards to create an "engine" that will further ensure that Housing Choice Participants have the opportunity to reside in quality living environments including quality housing units and quality neighborhoods. Initially, AHA established higher inspection standards than HUD's Housing Quality Standards with a focus on improving the quality of the units on the Housing Choice Program. During FY 2010, AHA will use MTW innovation to create Housing Choice site and neighborhood standards that consider such quality of life factors as neighborhood amenities, poverty level, school performance, crime level, revitalization activities and access to public transportation and employment opportunities. AHA anticipates that higher inspection standards combined with higher eligibility criteria for Landlords participating on the Housing Choice program will help ensure more stability and higher quality living environments for low income families.

A number of the key reform policies will also continue to be implemented in AHA's Housing Choice Voucher Program, such as Work/Program Participation Requirement, $125 Minimum Rent, Elderly Income Disregard and Rent Simplification which are further described in various sections of this plan.

The supporting activities that follow further illustrate how AHA has used and will use its MTW Authority in developing innovative solutions to local problems.

AHA's Housing Choice Operations Department provides leadership to this priority in the agency. The department provides subsidy so that an "eligible" household can lease a "qualified" dwelling in a "decent" neighborhood at an "agreed" rent that is reasonable given its location, quality, amenities and rent comparables. Some dwellings include utilities; some dwellings do not. AHA provides a utility allowance so that the utilities are affordable to the household. AHA currently services over 9,000 families through its Housing Choice tenant based voucher program.

During FY 2009, AHA further refined its core functional work activity for the department into four primary areas: (1) Participant Services, (2) Landlord Services, (3) Housing Assistance Payments Contracting, and (4) Financial and Business Operations. By utilizing this approach, Housing Choice Operations will foster a more customer-centric focus in the service delivery units and improve cross functional collaboration both within the department, and with other AHA departments. During FY 2010, AHA will implement a number of key priorities aligned to the four core functional areas as follows.

Supporting Activities

During FY 2010, AHA will continue exercising its MTW Authority to re-engineer the Housing Choice Voucher Program focusing on, but not limited to, the following strategic priorities:

Housing Choice Supporting Projects – Participant Services

Starting in FY 2009 and into FY 2010, Housing Choice Operations will make a decisive shift to a customer-focused tenant voucher program by streamlining and enhancing its service delivery to applicants and participants. The Participant Services group will administer the full life cycle of functions from participant relationship management to waitlist administration and processing; intake and eligibility screening; voucher generation and briefing; management of program moves, portability transactions, annual recertification, referral to human services development; and, participant compliance, hearings and terminations. To successfully execute enhancements to these core functions, Housing Choice Operations will place particular emphasis on the following:

- **Policy Changes** – Housing Choice Operations will continue to develop, refine and institute policy, procedures and business processes using the authority under its Restated MTW Agreement in order to address local challenges and barriers to the effective delivery of housing assistance in the Atlanta market. AHA will continue the implementation of rent simplification strategies and further explore policy changes that streamline and improve the operational efficiency of the Program, facilitate greater success of the Participants in Atlanta neighborhoods and improve the quality of the housing and Landlords participating on the Program. During FY 2009, AHA began conducting a step-by-step analysis of HUD regulatory requirements for the Section 8 program, identifying barriers and using MTW innovation to create its own streamlined policies and procedures as a substitution to existing HUD requirements. AHA will continue this work throughout FY 2010.

- **Participant Relationship Management** – Housing Choice Operations will implement strategies to further develop its relationships with participants in order to facilitate self-sufficiency, improve service delivery and ensure their success in economically integrated neighborhoods. Such strategies will include demographic analysis and market segmentation, customer service surveys, educational sessions, enhanced communications involving e-mail and other technology, improved phone and walk-in customer service, improved connections with human services and enhancement of the Participant Advisory Board. Given the tremendous growth of AHA's Housing Choice participant population, AHA will also implement innovative strategies that reduce the administrative burden associat ed with carrying out annual re-certifications through use of technology, group re-certifications and other methods.

- **Rent Simplification** – In collaboration with other AHA departments, Housing Choice Operations will implement higher AHA Standard Deductions, with the intent of eliminating the costly and labor-intensive burden of collecting and verifying receipts for unreimbursed costs for allowable deductions. This will facilitate operating efficiency, improved customer service, accountability and

greater relationship management.

- **Staff Capacity** – AHA will continue building core competencies and skills with in the Housing Choice Operations aligned with the re-engineering of the program. Primary core competencies include but are not limited to statistical and data analysis, financial analysis, real estate contracting, inspections certifications, business intelligence management and transformational leadership. AHA will continue to enhance and further develop its staff so that work responsibilities align with staff core competencies, messaging is consistent and well informed and interactions with its customers and clients are more responsive and timely.

- **Technology Solutions** – Integral to Housing Choice Operation's re-engineering is the enhancement to its information technology infrastructure. In FY 2010, AHA will implement a major system conversion from the DDI (Data Directions Inc.) system to Oracle E-Business Suite. This conversion will allow the consolidation of a number of localized databases and programs to one comprehensive relational system. Phase II of the conversion is also slated to begin the latter part of FY 2010 which will entail further refinement of business processes and enhancements to the Oracle E-Business Suite. An Oracle based records management system for maintaining participant, land lord and property information will also be developed.

  AHA will also further enhance its centralized call center to improve customer service and handling of participant inquiries and business transactions. AHA plans to establish an on-line neighborhood information resource to use both to educate participants as well as for use in implementing enhanced site and neighborhood standards.

Housing Choice Supporting Projects – Landlord Services

Housing Choice Operations is expanding the scope and breadth of its Landlord Services function. AHA intends to move to a private sector business model to enhance relations with prospective and current owners/landlords who interface with the tenant based voucher program. The Landlord Services group will be responsible for landlord relationship management, housing marketing and outreach, landlord briefings and certification, landlord communications, landlord portal and handling landlord phone calls, walk-ins, emails and correspondence. Concurrent to the execution of this operational activity are key emphasis areas:

- **Landlord Relationship Management** - To further build upon its relationship with experienced property owners and landlords participating in the tenant-based voucher program, AHA will continue enhancing its processes and procedures, and where appropriate, develop policies to

effectively manage the quality of its landlord pool and units participating on the program. The Landlord Services Group will serve as the primary point of contact for landlords on matters pertaining to their participation in the Housing Choice Voucher Program. Landlord Services will serve as the first point of entry for interested property owners seeking to do business with AHA, and will continue the management of the relationship post execution of the Housing Assistance Payments (HAP) contract in conjunction with the HAP Contracting group described below.

Additionally, this group will continue conducting landlord briefings and trainings and will institute a Landlord Certification requirement to ensure that landlords are fully aware and educated on the Housing Choice Voucher Program requirements. Other relationship building strategies will include demographic analysis and market segmentation, customer service surveys and a Landlord Advisory Board during FY 2010.

- **Technology Solutions** – During FY 2010, AHA will explore consolidation of its Property Owner Application and Request for Tenancy Approval documents into a single Housing Assistance Payments Application for electronic completion and submission via AHA's Landlord Portal, and will establish a state-of-the-art system for educating participants on how to search among the various listings of available housing opportunities. As previously discussed, AHA will also further enhance its centralized call center to improve customer service and handling of landlord inquiries and business transactions, and plans to establish an on-line neighborhood information resource to use both to educate participants as well as for use in implementing enhanced site and neighborhood standards.

Leasing Incentive Fees – Used primarily in the past as a relocation strategy, during FY 2010, AHA will expand the use of the LIF to provide additional support to Housing Choice participants in their choices to move to low poverty areas as determined by AHA. The LIF will afford Housing Choice families the opportunity to exercise their choice to move into quality, rental housing in low poverty areas.

Housing Marketing – AHA will develop and implement an aggressive housing marketing plan to recruit quality units in low poverty areas into AHA's Tenant Based Housing Choice Program during FY 2010. AHA will target experienced landlords and Class A and B multifamily properties in Atlanta's best neighborhoods. This approach is consistent with AHA's deconcentration strategy as set forth in AHA's Statement of Housing Choice Policies included in this plan submission.

Housing Choice Supporting Projects – Housing Assistance Payments Contracting

The Housing Assistance Payments Contracting group will be responsible for the complete life cycle of

services necessary to execute a HAP contract with an eligible landlord including receiving property owner / landlord applications, landlord and unit eligibility, requests for tenancy approval processing, QLI / relocation interface, rent determinations and adjustments, HAP Contract development and administration, landlord re-certifications and landlord terminations. Concurrent to the execution of operational activity to owner / landlords, are the following key emphasis areas:

- **Operational Enhancements** – During FY 2010, the HAP Contracting group will focus on making core business process improvements and procedural changes that create a seamless HAP Contracting process. This will include conducting a requirements gathering process to look at all major components in their current state and based on the desired future state understand, refine and institute Housing Choice and other departmental requirements. The group will also focus on improving the system for rent determination/rent reasonableness and rent adjustments. This effort is intended to improve internal controls to promote a seamless system for HAP Contracting processing.

- **Inspections** – Components of AHA's Enhanced Real Estate Inspections systems include: inspections for single family and multifamily that include pre-contract assessments; initial inspections for property inclusion in the Housing Choice Voucher Program; annual property and unit inspections; special inspections as initiated by participant, Landlord or neighbors related to health and safety issues; and Quality Control inspections used to re-inspect properties that have passed or failed previous inspections. During FY 2010, AHA will continue to re-engineer its inspection standards and processes to further align outcomes with AHA's strategic direction and vision of Healthy Mixed - Income Communities.

  As a key component its Enhanced Real Estate Inspections systems, AHA will restructure its site and neighborhood standards in order to establish qualitative standards for units participating in the Housing Choice Voucher Program. These standards will consider such community attributes as school performance, access to quality amenities, services, and schools, and the level of poverty and crime in the surrounding area. In addition, Housing Choice Operations will conduct an analysis and evaluation of properties currently participating on AHA's Housing Choice Voucher Program and develop a strategic approach for transforming its Housing Choice tenant based units portfolio to one that provide quality living environments for Housing Choice Participants more aligned with its strategic direction.

- **Technology Solutions** – Core to the operational enhancements of this group is the requirement to develop or improve its IT solutions and enhanced access to on-line information necessary to

screen landlords participating in the program. AHA will make investments in its Housing Choice landlord/vendor database, inspections and pre-HAP contract IT modules to correspond to any procedural or process improvements that will occur during FY 2010.

Housing Choice Supporting Projects – Financial and Business Operations

The transformation of the Housing Choice business model is incomplete without the creation of supporting and enabling infrastructure that can serve as a foundation for AHA's Housing Choice Operations. This component also relates to the community building aspect of the Housing Choice Voucher Program with local stakeholders, and business relationships with other metropolitan area housing authorities in managing ports and the organizational coordination that will be required to support the on-going re-engineering of the department. This will include the following activities:

- **Housing Choice Operating System** – As previously discussed, AHA will complete the transformation of its business systems to one client information system and begin Phase II enhancements toward a world class system during FY 2010.

- **Port Administration** – AHA envisions building stronger collaboration and working relationships among metropolitan Atlanta Public Housing Authorities in seamlessly managing over 3,000 porting households participating in its Housing Choice Program. Toward this goal, AHA is working with its PHA partners to establish Intergovernmental Agreements among the agencies and automating port invoicing among PHAs. During FY 2010, AHA plans to use its MTW flexibility to streamline the port management procedures and create greater collaboration in implementing AHA's work/program participation requirement and other policy requirements.

- **AHA4You community meetings** – During FY 2010, AHA will continue to host community meetings in an effort to maintain and build relationships with its stakeholders.

- **Housing Choice Community Advisory Group** – In an effort to further the success of the Housing Choice Tenant Based Program in Atlanta's neighborhoods, AHA will establish a community advisory board aimed at building collaborative relationships among public elected officials, neighborhood leaders, advocacy groups, property owners, law enforcement and Housing Choice participants.

- **Customer Service Contact Center** – During FY 2010, Housing Choice Operations will continue to "power up" and streamline the services offered by its Call Center.

- **Financial Management** – During FY 2010, Housing Choice Operations will continue to strengthen internal controls related to the processing of Housing Assistance Payments to eligible landlords participating in the Housing Choice Program.

"The monetary value of a House is measured by its cost, while the intrinsic value of a Home is measured by the family bond, peace and refuge that it brings - the wise among us know that the two values are inextricable."

Dr. E. Mike Proctor

PART VI:

ASSET MANAGEMENT AND POLICY DEVELOPMENT

Asset Management provides strategic oversight and financial management of AHA's assets, real estate investments and facilitates and manages certain strategic and external business relationships on an organizational basis. As a priority activity, asset management functions to further develop and evolve AHA's systems, processes, procedures and staff capacity to create a comprehensive, collaborative and integrated asset management resource for the entire organization with an emphasis on internal and external business relationship management and technology oriented solutions.

The Asset Management and Policy Development Group, comprised of Asset Management, Portfolio Management and Compliance, Valuation and Risk Assessment and Policy Research, facilitates and manages all aspects of the ongoing business relationships with Owner Entities in AHA-sponsored mixed-income communities and private sector developers and owners through the execution of Project Based Rental Assistance (PBRA) Agreements. Additional oversight functions include compliance monitoring activities and fee-based contract administration for federally assisted properties; policy development and advisement; and oversight of program evaluations in coordination with local universities and contracted organizations which include AHA's HOPE VI evaluations and MTW Benchmarking Study.

Significance of MTW

Asset Management is a critical player in designing and implementing a number of reforms utilizing the authority under AHA's Restated MTW Agreement in order to enhance operational efficiency and effectiveness, accountability, integrity and excellence. As a relationship manager, Asset Management ensures that the flexibility and authorizations AHA is able to exercise through its Restated MTW Agreement inures to the benefit of its strategic partners which include the Owner Entities and their professional management companies, and private developers and owners. The Asset Management Group has also developed a number of leasing and occupancy policies, utilizing AHA's authority under the Restated MTW Agreement. Two of those policies, which emphasize client economic self-sufficiency, personal accountability and responsibility, are discussed under AHA's Human Development priority (work/program participation requirement and Minimum Rent). AHA's Statement of Corporate Policies and Statement of Housing Choice Policies located in

Appendix P and ***Appendix Q*** of this Plan, respectively, provide a comprehensive listing of AHA's leasing and occupancy policies that AHA has implemented that affect Public Housing and Housing Choice-assisted households.

Working collaboratively and in coordination with a number of AHA's Divisions including Finance, Real Estate Development and Acquisitions, Information Technology, Legal and Housing Choice, Asset Management continues to support and drive the seamless delivery of AHA's repositioning, revitalization and investment strategies with the various Owner Entities and private owners to ensure the continued viability and market competitiveness of AHA's portfolio of real estate partnerships and holdings while preserving the investments in low-income housing. This includes the conversion of public housing operating subsidy to Section 8 subsidy as discussed under the Sustaining Mixed-Income Investments and Innovative Subsidy Strategies as well as Private Sector Innovation strategies, as discussed below.

MTW Implementation Protocols – Several MTW Implementation Protocols have been developed that further clarify or articulate the process or methodologies that AHA will use to further its Business Plan activities and the work of Asset Management. These protocols include:

- ***Disposition of Public Housing Operating Subsidy in AHA–Sponsored Mixed – Finance Communities Protocol*** – Provides the process by which AHA will dispose the public housing operating subsidy under Section 9 of the 1937 Act to renewable project based rental assistance under Section 8 of the Act in AHA-sponsored, mixed-income, mixed financed rental communities. This protocol will be resubmitted under separate cover due to the strategic importance of this protocol as a MTW initiative and the need for further detailed discussions between AHA and HUD.

- ***Disposition of Public Housing Operating Subsidy in AHA-Owned Affordable Communities-*** Provides the process by which AHA will dispose of the public housing operating subsidy under Section 9 of the 1937 Act to renewable project based rental assistance under Section 8 of the Act in AHA Affordable communities. This protocol will be resubmitted under separate cover due to the strategic importance of this protocol as a MTW initiative and the need for further detailed discussions between AHA and HUD.

- ***Project Based Rental Assistance Developer Selection Criteria Protocol*** – AHA developed a PBRA Developer Selection Criteria Implementation Protocol which describes the process AHA will use for considering developers and owners, through a competitive solicitation process, for participation in the PBRA program. AHA is re-submitting this protocol to HUD under this Plan submission for final approval (Protocol is located in ***Appendix O***).

Private Sector Innovation - The public/private partnerships formed to own AHA-sponsored mixed-income multifamily rental apartment communities (Owner Entities) have been authorized by AHA, through various agreements, to leverage the authority under its Restated MTW Agreement to use innovative private sector approaches to eliminate redundancy or unnecessary activity tied to the Section 9 or Section 8 operating subsidy. AHA's asset management function has been organized with respect to the mixed-income rental communities and the PBRA-assisted communities to take a unified approach focused on items such as subsidy considerations, leasing and occupancy reporting, financial reporting, site-based waiting list management, policy-related matters and compliance and oversight guidance with goal of long-term success and sustainability of these properties. During FY 2010, AHA will work with these Owner Entities to develop a policy document to promote private sector innovation in these communities.

Sustaining Mixed-Income Communities - During FY 2008, using the authority under its Restated MTW Agreement, AHA developed a strategy to convert the public housing operating subsidy at AHA-sponsored mixed-finance, mixed-income communities to PBRA in order to sustain and preserve investments in AHA-assisted units comprising a portion of these multi-family rental communities. Disposing of the Section 9 subsidy during the economic life of the property as it begins to age will enable the Owner Entity to raise new capital to be re-invested in the property to ensure its continued viability and market competitiveness.

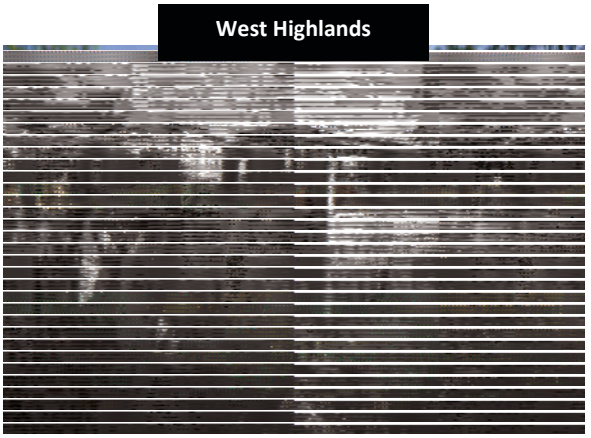
During FY 2010, AHA will amend the Regulatory and Operating Agreements and implement an internally payment application invoicing process to execute this strategy. AHA will also continue working with HUD to obtain approval of its Disposition of Public Housing Operating Subsidy and Substituting Renewable PBRA subsidy for the AHA-assisted units in AHA-Sponsored Mixed Finance Communities Protocol for further implementation of this strategy. ***Appendix F*** of this Plan lists mixed-income developments that are candidate properties for this conversion strategy.

Innovative Subsidy Strategies for AHA's Affordable Communities Providing Housing for Seniors and Residents with Disabilities - Similar to the mixed-income community investment strategy above, this supporting activity provides innovative strategies for substituting the Section 9 subsidy arrangement for Renewable PBRA at 13 of AHA's longer-term hold[1] affordable communities (11 senior high-rises and two small family communities). The opportunity for such Affordable communities to achieve long-term viability can only be realized by either removing (through disposition) or restructuring the Section 9 ACCs (Annual Contributions Contract).

This strategy would also enable AHA to generate the income necessary to reinvest in these communities in order to meet the accessibility needs of its residents. During FY 2010, AHA will continue working with

[1] Longer-term hold communities refer to those communities AHA will retain in its real-estate owned portfolio.

other deductions. During FY 2009, AHA further implemented this policy by conducting a rent impact analysis and obtaining Board approval on the standard deductions schedule.



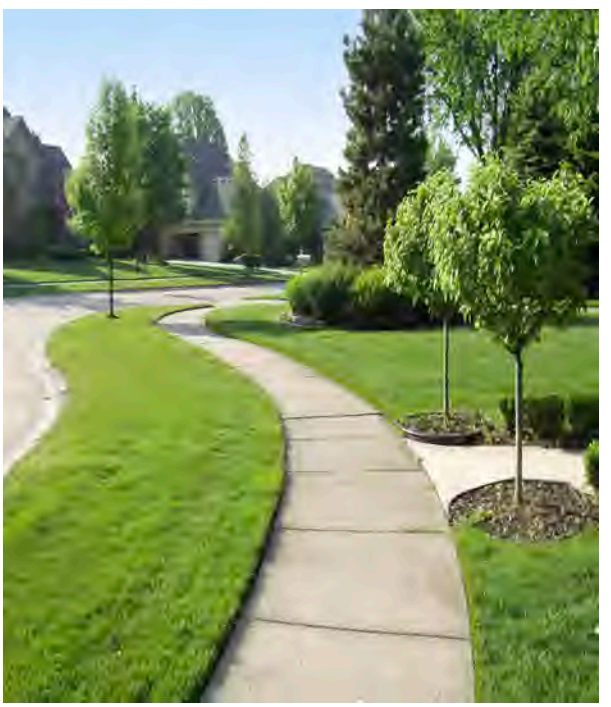
During FY 2010, AHA will continue the implementation of its rent simplification strategy. Additionally, as AHA enters into Intergovernmental Agreements with Atlanta metro PHAs to establish business relationships around portability, work/program participation requirement of clients, PBRA, subsidy billing and other matters, AHA will also work to incorporate the rent simplification methodology inside of these Agreements.

Corporate Policies Governing Eligibility, Occupancy and Program Administration

Statement of Corporate Policies Governing the Leasing and Residency of Assisted Apartments (Statement of Corporate Policies) - The Board of Commissioners last adopted Revision Four of AHA's Statement of Corporate Policies or SCP on April 30, 2008 after conducting a properly advertised and noticed public hearing held on April 15, 2008. This revision was included in AHA's submission of its FY 2009 MTW Annual Plan (CATALYST Implementation Plan) to HUD on May 7, 2008. The SCP was updated to clarify established policies and revise existing language, as appropriate, to ensure consistency in rent and occupancy policies governing the public housing and Housing Choice Voucher programs. At the writing of this draft plan, AHA anticipates that similar non-substantive changes will be made for the SCP submission of this FY 2010 Plan. A copy of the SCP is included in ***Appendix P*** of this Plan.

Statement of Policies Governing the Housing Choice Tenant-Based Program (Statement of Housing Choice Policies) - The Board of Commissioners adopted Revision Six of the Statement of Housing Choice Policies on April 30, 2008, along with the SCP above after conducting a public hearing on April 15, 2008. Similar to the SCP above, the Statement of Housing Choice Policies was updated to clarify established policies and revise existing language to ensure consistency between this document and the SCP. Additionally, policy language was included with respect to reasonable accommodations which afford persons with disabilities full participation in the Housing Choice Voucher program and related AHA activities, and added policy language related to the development of special programs.

Subsequent to this approval, AHA's Board adopted Revision Seven of the Statement of Housing Choice Policies on September 3, 2008 to elevate one of AHA's special programs, Housing Choice Homeownership



"A strong community is filled with families that participate in the vitality of the community – where friends know friends and neighbors know neighbors. We look out for one another."

Barney Simms

PART VII:
HUMAN DEVELOPMENT

With Human Development being a major priority, AHA will continue to facilitate, through targeted investments and strategic linkages, connections to human services providers for AHA assisted households to ensure healthy outcomes with the goals of achieving (a) economically independent families; (b) educated children; and (c) self-sufficient elderly and persons with disabilities. AHA believes as a direct result of repositioning its properties and investing in the families, in time, the social and behavioral costs resulting from isolating families in concentrated poverty can be eliminated. To ensure that families are successful, AHA has adopted three guiding philosophies that direct its Human Development activities:

1. All families must be served and benefited by Human Development and Support Services Programs, especially during community revitalization;
2. Families who have lived in concentrated poverty must have comprehensive, hands-on support that connects them to mainstream society and new opportunities; and,
3. Human Development and Support Services Programs must be out come driven with the expectation of success for families.

The Resident Services and Community Partnerships Departments manage the supporting activities under this priority. Staff in this division serves as AHA's interface between the clients, strategic partners, service providers and community stakeholders on matters relative to client success and community relations. It is also the core organizational unit working collaboratively with other AHA departments and with community-based partners in designing, implementing and managing client self-sufficiency programs and supportive services.

Significance of MTW

AHA has raised its expectations and standards for assisted households grounded in the belief that all human beings have unlimited potential. AHA believes that repositioning its family communities into mixed-use, mixed-income communities is vital to the long-term success of families and neighborhoods and by using its authority under the Restated MTW Agreement, AHA has been able to implement important policy changes and requirements to

inspire and facilitate families in achieving their life goals. Below are highlights of how MTW has enabled AHA to provide an enhanced Human Services component.

Policy Changes - Since the start of its MTW Demonstration, AHA has instituted a number of new leasing policies for assisted households. Some of these policies have self-sufficiency implications which are predicated on two objectives: (a) families must take more personal responsibility, and (b) families must embrace and be held accountable for maintaining quality standards in their new surroundings and be contributing members in these communities. Two specific policies that have been instituted that align with raising expectations and standards for assisted households while promoting economic self-sufficiency are:

- **Work/Program Participation Requirement** – Effective October 1, 2004, AHA's work/program participation policy requires that (a) one non-disabled adult household member (between the age of 18 – 61 years) maintain continuous full-time employment (at least 30 hours per week) and (b) all other non-elderly, non-disabled adults maintain work or participation in a combination of school, job training and/or part-time employment as a condition of the household receiving and maintaining subsidy assistance.

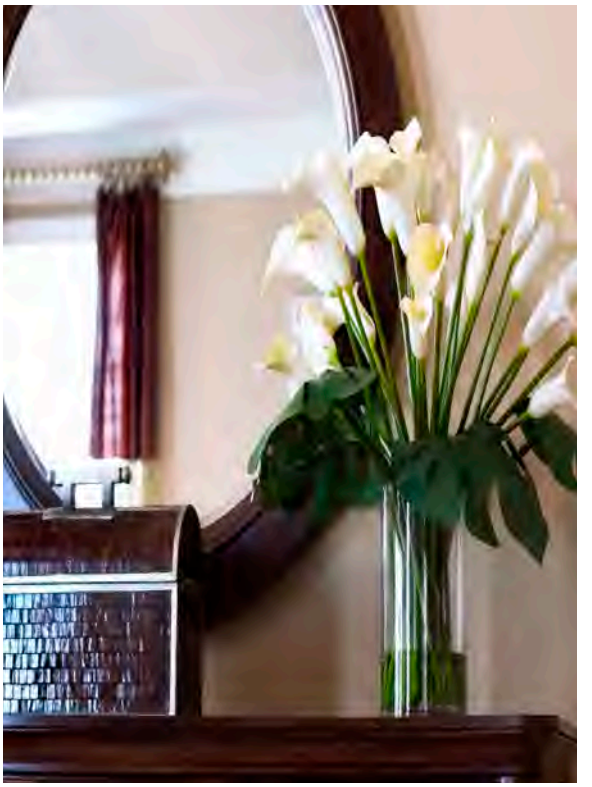
- **$125 Minimum Rent** – Effective October 1, 2004, AHA raised its minimum rent from $25 to $125 under its Public Housing and Housing Choice Programs. Households on fixed incomes, where all members are either elderly or disabled, are exempt from the minimum rent increase and their total tenant payment continues to be based on 30 percent of their adjusted gross incomes. Since implementing this requirement, AHA has seen a steady increase in households paying at or above the minimum rent.

Self-Sufficiency and Support Services - Consistent with its authorizations under the Restated MTW Agreement, AHA has taken advantage of the opportunity to design and develop its own self-sufficiency programs and activities that utilize its MTW single fund authority to support the on-going implementation of these programs. The ability to combine multiple types of HUD funding for use with eligible MTW activities has been germane to the overall success of AHA's self-sufficiency efforts. It affords AHA the ability to implement programs and activities and make targeted investments consistently and uniformly across its Public Housing and Housing Choice programs which was not available to AHA prior to MTW. Some examples of self-sufficiency and support services AHA has instituted that are discussed under this priority include:

- Human Development and Support Services
- Service Provider Network
- Good Neighbor Program II
- CATALYST Resource Guide

capacity of the community to support them in that process. The NORC places a strong emphasis on resident involvement with priorities set by residents and new initiatives capitalize on the economy of scale created by the concentration of individuals with similar needs. Led by the Atlanta Regional Commission's (ARC) Division on Aging, the primary partners on this pilot include AHA, Visiting Nurse Health System, Piedmont Hospital, Jewish Family and Career Services, Jewish Federation of Greater Atlanta.

During FY 2010, the NORC pilot will continue at the three AHA high-rises utilizing a $375,000 ROSS (Resident Opportunities and Self-Sufficiency) grant secured by ARC during FY 2007. Additionally, as a result of an Outreach grant received by ARC, during FY 2010 volunteers will be mobilized to the pilot sites and other AHA senior high-rises to assist seniors and persons with disabilities in getting enrolled into benefits that serve Medicare and Medicaid beneficiaries.



"Home is where the heart is; where you experience tranquility and peace. Home is where one can sit down to a feast. Home is where God is found; at His house is a Holy ground."

*** AHA Commissioner, Elder James Brown ***

PART VIII:

LONGER-TERM HOLD COMMUNITIES

As highlighted in the Executive Summary, AHA will continue to improve the quality of the facilities of its longer-term hold properties and develop expertise in housing for the elderly. The 13 longer-term properties include 11 senior high-rises and two small family communities. With increased emphasis on supportive services for the elderly and persons with disabilities residing in these communities, AHA intends to use its MTW authority to reposition these longer-term hold properties and strategically invest capital resources to improve the quality of life of its residents. Professional Private Management Companies (PMCOs) will continue to comprehensively manage these properties in accordance with AHA's goals, objectives and financial resources. AHA will also utilize approximately $18.5 million of its $26.5 million allocation of American Recovery and Reinvestment Act (ARRA) formula Capital Funds for rehabilitation of its longer-term hold properties as described below. A listing of the longer-term hold properties is located in ***Appendix F***.

During FY 2010, AHA will focus on real estate enhancements that reflect priorities to improve life / community safety, code compliance and viability of property, sustainability, and life enhancement for seniors and persons with disabilities.

Supporting Activities

4 to 1 Elderly Admissions Policy at AHA's High-Rise Communities – In 2004, AHA implemented a 4 to 1 elderly / almost elderly admissions policy to address the complex social issues associated with housing seniors and young persons with disabilities in consolidated high rise physical settings. This admissions policy allows the PMCOs to admit 4 elderly (62 years and older) or almost elderly (55-61) persons from the waiting list before admitting a non-elderly person with disabilities until an optimal mix of elderly / almost elderly and non-elderly residents with disabilities is reached for each community.

Elderly Income Disregard – On October 1, 2004, AHA implemented an income disregard for the Public Housing and Housing Choice Programs for employment income earned by elderly residents or participants on a fixed income. AHA will continue to implement this policy as part of the affordable housing operations during FY 2010 as we continue to emphasize the importance of work in enhancing long-term family self-sufficiency.

$125 Minimum Rent – Effective October 1, 2004, AHA raised its minimum rent from $25 to $125 for its Public Housing and Housing Choice programs and will continue to do so in FY 2010. It should be noted that this policy does not apply to households where all members are either elderly or disabled and living on a fixed income, in which case their total tenant payment continues to be based on 30% of their adjusted gross income.

Work/Program Participation Requirement – As described under the Human Development priority, AHA will continue to implement its work / program participation policy for all non-elderly, non-disabled adult households. As AHA's affordable housing real estate portfolio evolves to a more senior resident focus, the work / program requirement will primarily be applicable to families living in the two small family communities of Westminster and Martin Street Plaza.

Enhanced Real Estate Inspection Systems – In AHA's quest to improve physical conditions at its properties, AHA has developed a system of primary and secondary real estate inspections to provide an integrated assessment of the physical condition of each property. These inspections assist in the proactive identification of problems and allow AHA and its PMCO partners to articulate proposed solutions and track problem corrections to closure. Inspection types include Rental Integrity Monitoring (RIM) review, asset control & risk assessment, UPCS, security, major systems, and elevator preventative maintenance. ***Appendix H*** of this Plan further describes the inspections and reviews set to take place during FY 2010.

Marian Road High-rise –parking lot

Enhanced Accessibility Initiative – Following the inception of AHA's 1998 Americans with Disabilities Act (ADA) transition plan, AHA has had an ongoing commitment to improve the accessibility of its services, programs, and activities for persons with disabilities. Key concepts that are integrated throughout AHA's ADA program include programmatic access, reasonable modifications, reasonable accommodations, and effective communication. Additionally, in the area of facilities access, AHA is significantly expanding our inventory of enhanced units so that we meet or exceed federal standards of 5% wheelchair accessible units and 2% of units accessible for persons with hearing or visual disabilities. This commitment is reflected in AHA's leasing and tenancy policies discussed under the Asset Management Priority (i.e. Statement of Corporate Policies and Statement of Housing Choice Policies) and aligns to our objectives outlined in our Voluntary Compliance Agreement (VCA) with HUD which became effective on March 15, 2007.

ects and related construction management and design fees for the 13 longer-term hold communities. These improvements include rehabilitation of dwelling structures, major systems, site improvements to include parking lot, exterior landscaping, erosion control and sidewalk and street repairs; improvements to common areas including lobbies and non-dwelling equipment such as computers used by tenants; and, energy efficiency improvements as described above under Energy Management Initiative. These improvements are planned to enhance the quality of the living environment and create spaces for seniors and persons with disabilities that enhance resident quality of life and are attractive, inviting, and functional to their needs.

“Home is the place from which we draw inspiration to pursue our dreams and strength to succeed.”

∗Reneé Bentley∗

PART IX:
CORPORATE SUPPORT

Using its MTW flexibility, AHA will continue making enhancements to improve its ongoing business operations and economic viability. These activities include, but are not limited to, capital improvements at AHA-owned properties and AHA-sponsored mixed-income communities, enhancements to information technology and changes to financial management, reporting and analysis.

Comprehensive Integrated and Relational Agency-wide Database – As AHA continues to improve its information technology, financial, procurement, data and business system infrastructure, AHA will assess systems and business processes to ensure they align with current and future business operations and needs. AHA will also focus on creating a comprehensive, integrated and relational database using data as intelligence to inform and improve business decisions. This initiative will require both human and financial resources beginning in FY 2009 and 2010. When completed, AHA expects this initiative to yield significant returns over time including greater operational efficiency, effectiveness and cost savings.

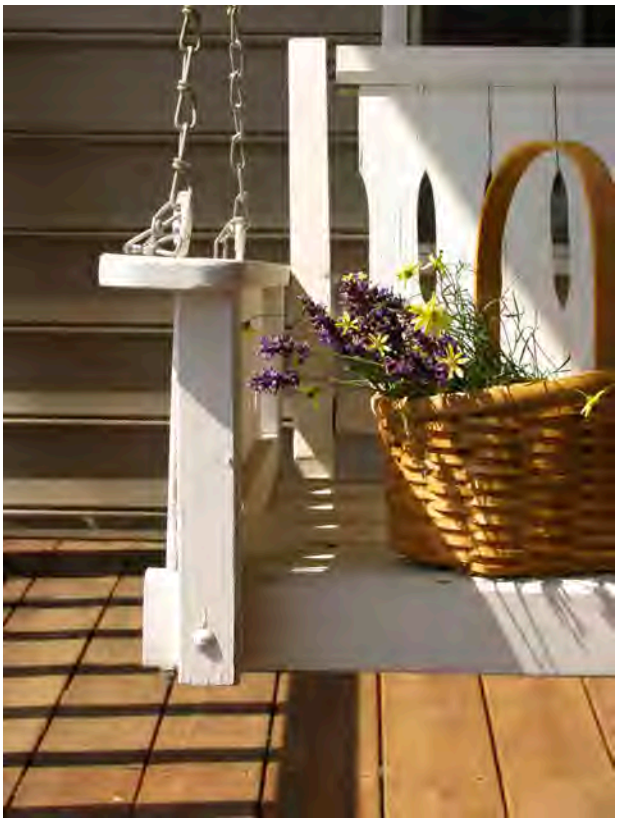
Local Asset Management Program – Beginning in FY 2009 and continuing into 2010, AHA will refine its project based accounting and management system by designing and implementing a new Cost Allocation Plan. This approach will enhance AHA's ability to capture and report all costs associated with the operation of the cost objectives identified. The Cost Allocation Plan was designed to meet the requirements of The Amended and Restated Moving to Work Agreement and the requirements of the revised OMB Circular A-87, Cost Principles for State, Local, and Indian Tribal Governments to provide improved financial reporting for each cost objective. AHA intends to implement the Local Asset Management Program, which contains the cost accounting system on July 1, 2009 and monitor and refine the plan on ongoing continual basis. ***Appendix T*** of this Plan provides a comprehensive description of AHA's Local Asset Management Program.

AHA Annual Budget and Previous Year's Expenditures – Included in ***Appendix L*** of this Plan is AHA's Board-Approved FY 2009 Comprehensive Operating and Capital Budget for the period ending June 30, 2009. AHA had not completed its FY 2010 Budget at the submission date of this Plan. AHA will seek approval from its Board of Commissioners in May 2009 at which time the FY 2010 budget will be available for review. Also, since AHA has not finalized its FY 2010 budget, an explanation of changes in the proposed

activities/investments between FY 2010 and FY 2009 could not be addressed. Under ***Appendix N***, AHA has provided Financial Highlights of its Condensed Statements of Net Assets and Condensed Statements of Revenues, Expenses and Change in Net Assets for the period ending June 30, 2008 and June 30, 2007, respectively.

Human Resources Development – As an integral part of AHA's strategic team, the Human Resources Department serves as a resource to all associates and leaders providing guidance in the development, implementation and administration of Human Resource policies, programs and systems to support AHA's goals and objectives. In addition, the Human Resources' function ensures fair, equitable and responsible leadership to foster a positive work environment throughout the organization. During FY 2010, Human Resources will focus on partnering with AHA leadership to develop the "people strategy" needed to support the transformation of AHA into a diversified real estate company. Human Resources will examine core competencies required by associates to meet the changing dynamics of the work environment and recruit talent, as needed, or develop appropriate core competency training curriculum. Additionally, Human Resources will continue implementing its in-house training to address various levels of employee development and training needs.

Media Management – As part of its communication plan, AHA relies on the procured services of the Alisias Group, an Atlanta-based public relations firm, to manage media relationships at the national, state and local levels; manage certain external community relationships; develop innovative approaches to positive and consistent messaging to AHA-assisted households, local, state and national political bodies and stakeholders; and, manage the development of AHA's CATALYST collateral materials. This work includes developing communication materials that are designed to inform, educate and motivate AHA-assisted families as well as the broader community. During FY 2010, Alisias will continue to provide communication support in the strategic areas of media relations, QLI, MTW, neighborhood revitalization and Intergovernmental communications.



"Home is a place of peace and serenity; where I can just relax, be myself and enjoy my family."

*** Joy Fitzgerald ***

PART X:
AMERICAN RECOVERY AND REINVESTMENT ACT (ARRA) FUNDS

On February 17, 2009, the President signed the American Recovery and Reinvestment Act (ARRA) of 2009. This legislation includes a $4 billion appropriation of Capital Funds for public housing agencies to carry out capital and other investment activities. ARRA requires that $3 billion of the appropriation be distributed as formula funds to public housing agencies and the remaining $1 billion be distributed through a competitive process. The legislation provides for specific eligible uses of the funding which include development, demolition, rehabilitation activities and capital improvements. Funds must be obligated within one year and spent within three years; thereby, requiring public housing agencies to use the funds on eligible projects that are "shovel ready" or can be implemented quickly.

Formula Funding

As part of the formula funding, AHA will receive approximately $26.5 million in ARRA funds and intends to use the funds for the following purposes:

I. ($8 million) Quality of Life Initiative Demolition Activities for the following Phase II communities:

- Bankhead Courts
- Hollywood Courts
- Thomasville Heights

II. ($18.5 million) Rehabilitation of AHA's 13 longer-term hold properties:

- **Site Improvements/Infrastructure** – paving, site repair and landscaping
- **Building Envelop** – Improvements to building exterior to include roofing, windows and doors. Improve energy efficiency where practical
- **Major Systems** – Improvements to mechanical, electrical and plumbing systems. Completion of elevator upgrades
- **Dwelling Units** – Improvements to kitchens, bathrooms and living areas
- **Common Areas** – Lobby area, common area renovations and non-dwelling equipment

Longer-term Hold Communities:

1. Barge Road
2. Cheshire Bridge Road
3. Cosby Spear Towers
4. East Lake Towers
5. Georgia Avenue
6. Hightower Manor
7. Juniper & 10th Street
8. Marian Road
9. Marietta Road
10. Peachtree Road
11. Piedmont Road
12. Martin Street Plaza
13. Westminster

Appendix U of this Plan includes the completed Capital Fund Annual Statement Part I and II which provides detail on the intended uses of the funds, and a resolution from AHA's Board of Commissioners approving AHA's acceptance of this funding. The Capital Planning section of the Plan (***Appendix M***) discusses AHA's Capital projects using both ARRA and MTW Funds. It should be noted that although ***Appendices M*** and ***U*** provide intended uses and dollar amounts for the ARRA funds, to the extent that bids come in favorable for planned work items, AHA may adjust the planned expenditures to include (1) fund the balance of the demolition costs at Hollywood Courts, based on current cost estimates; (2) demolition at additional QLI Phase II properties; (3) additional rehabilitation at the longer-term hold communities; and/or, (4) implement additional projects identified in AHA's Physical Needs Assessment.

Competitive Funding

In response to HUD's release of Notice of Funding Availability (NOFA) for the $1 billion in ARRA competitive capital funds, AHA will make application for a portion of these funds. AHA anticipates the eligible activities under the NOFA will not deviate from the ARRA Legislation; therefore, the following includes, but is not limited to, the activities AHA may apply for under the competitive round:

- Development Activities to further the revitalization of the following properties:
  - Perry Homes
  - Carver Homes
  - Capitol Homes
  - Grady Homes
  - Harris Homes
  - McDaniel Glenn
  - Techwood - Clark Howell Homes
- Acquisitions that support revitalization activities
- Redevelopment of other AHA-owned buildings or properties
- Additional rehabilitation of AHA's longer-term hold properties
- Other projects captured in AHA's Physical Needs Assessment

“I love my home because home is where the heart is. It’s peace of mind, privacy and love. There’s no place like home.”

⁎LC Wilson⁎

PART XI:
MTW IMPLEMENTATION PROTOCOLS

Since the initial execution of AHA's moving to Work (MTW) Agreement in 2003, AHA, in collaboration with HUD, developed and memorialized additional implementation guidance ("Implementation Protocols") related to the authorizations set forth in AHA's MTW Agreement. The Implementation Protocols articulate procedures for implementing MTW activities and/or clarifies certain requirements, procedures and methodologies related to AHA's operation as an MTW Agency. AHA and HUD agreed that in order to facilitate innovation, such Implementation Protocols are needed, and as they are established they would become part of the operating procedures upon which AHA and HUD would rely during the MTW period, as such period may be extended.

As a result of AHA and HUD executing an Amended and Restated MTW Agreement, effective November 13, 2008, the Implementation Protocols were elevated to a status and standing in the Amended Agreement and are referenced in the Agreement under Attachment E. Attachment E of the Amended Agreement lists Implementation Protocols that have received HUD approval and those that have been submitted and are pending HUD approval. AHA and HUD also executed a second Amendment to AHA's Amended and Restated Agreement, effective January 16, 2009. The second Amendment rescinds any limitation or restriction of AHA's use of MTW Funds and MTW Funds Protocol as discussed earlier in this Plan.

Additionally, since the HUD-approved Implementation Protocols make reference to sections of AHA's initial MTW Agreement, AHA developed and sent to HUD an Implementation Protocol Updated Reference Chart which corrects the Agreement references in the Protocols to be consistent with the Amended Agreement. ***Appendix O*** of this Plan provides the Protocol Updated Reference Chart and cover letter that was sent to HUD on February 3, 2009. As stated in the cover letter, the correction of the references are purely administrative, and since they don't affect the substance of the protocols, AHA will continue its MTW program in accordance with the Amended Agreement and the approved Protocols.

Included in ***Appendix O*** of this Plan are four pending Implementation Protocols and one new Protocol that AHA is requesting HUD's final approval under this Plan submission. They are listed below:

Pending HUD final approval:

- HOPE VI Site and Neighborhood Standards
- Replacement Housing Factor
- Project Based Rental Assistance Developer Selection Criteria
- HUD Funding Availability

New Protocol for HUD review and approval:

- Project Based Rental Assistance Subsidy Layering Review Protocol

Three additional pending Protocols will be resubmitted under separate cover to HUD due to the importance of these protocols as a MTW strategy and the need for further detailed discussions between AHA and HUD. These protocols are: (1) Disposition of Public Housing Operating Subsidy in AHA-Sponsored Mixed-Finance Communities Protocol; (2) Disposition of Public Housing Operating Subsidy in AHA-Owned Affordable Communities Protocol (3) Designation of Senior and Disabled Public Housing Developments Protocol.

IMPLEMENTATION PROTOCOLS DESCRIPTION

The following provides a brief description of the approved MTW protocols since they are not included in this Plan:

ACC Waiver Protocol

- Amends the terms and conditions of the ACCs to the extent that such terms and conditions conflict with AHA's MTW Agreement. Reviewed and approved by OGC.

Alternate Resident Survey Protocol

- Allows the use of an Alternate Survey in lieu of the PHAS Resident Survey.

Fee for Service Methodology Protocol

- As approved by HUD, provides for a new methodology for charging administrative fees against HUD grants and programs that are administered by AHA, and establishes a project and site based accounting system.

Identity of Interest Protocol

- Sets forth procedures by which AHA would certify that it has met the HUD requirements for an IOI approval. The procedures mirror the certifications made in conjunction with the Mixed-Finance Closing procedures.

MTW Mixed-Finance Closing Procedures Protocol

- Sets forth procedures for closing mixed-finance transactions involving MTW or development funds.

Program Flexibility for Special Purpose Vouchers Protocol

- Provides that AHA's demonstration authority applies to all allocations of housing choice vouchers, including Special Purpose Vouchers.

Revision of MTW Benchmarks Protocol

- Since AHA is not subject to Public Housing Assessment System (PHAS) and Section Eight Management Assessment Program (SEMAP) reviews, Benchmarks are metrics in which AHA measures and certifies its performance during the Demonstration Period. There are 12 indicators - some relate to AHA's Section 9 (Public Housing), while some relate to the Section 8 (Housing Choice) programs and then there are others that are unique to AHA (e.g. household work/program compliance, resident homeownership and Project Based Financing Closings). Annual results of Benchmarks are captured in AHA's MTW Annual Report. Benchmarks run through 2010 – which was the initial end of AHA's seven–year Demonstration Period (See Protocol in ***Appendix O***). The Benchmark Protocol will be replaced with a Performance Implementation Protocol, upon HUD review and approval, which will certify AHA's performance against certain metrics and will determine AHA's designation as a "high performing" agency. AHA and HUD will negotiate this Protocol outside of the HUD Plan submission process.

Use of MTW Funds Protocol

- Sets forth procedures for utilizing MTW Funds in affordable residential properties owned by private entities to further the development and rehabilitation of housing that is affordable to low-income families.

“Home represents that we are part of the mainstream, we are included in the neighborhood and in this great city we live in.”

∗Marvin Nesbitt∗

PART XII:

MTW BENCHMARKING STUDY

As stated in the introduction of this Plan, AHA and HUD executed an Amended and Restated MTW Agreement on November 13, 2008, which among other things, extended the term of the MTW Agreement to June 30, 2018. On January 16, 2009, AHA and HUD further amended the Amended and Restated MTW Agreement to clarify the use of multiple types of HUD funding from Housing Choice Voucher allocations, low-income operating subsidies and Capital Fund grants into a single fund to be used for MTW eligible activities as provided in the MTW Agreement and AHA's CATALYST Business Plan. Combined into this single fund, these multiple funding sources are commonly referred to as MTW Funds. The Amended and Restated MTW Agreement provides AHA with substantial statutory and regulatory relief under the U.S. Housing Act of 1937, as amended, to implement local solutions to address local challenges in providing affordable housing opportunities to low-income families. The MTW Agreement provides that HUD may further extend AHA's MTW Agreement for additional ten-year periods, subject to AHA meeting certain agreed-upon conditions.

AHA's Revitalization Program and Quality of Life Initiative ("QLI") and the statutory and regulatory relief afforded by AHA's MTW Agreement have had a significantly positive impact on assisted families. As a result of these programs and statutory and regulatory relief, the composition and mix of AHA's portfolio have intentionally changed. As AHA has demolished its distressed and obsolete public housing, it has applied for and received Housing Choice Vouchers to support the relocation of affected households and to replace a significant portion of the demolished housing units that are not otherwise replaced through the Revitalization Program. Under AHA's MTW Agreement, AHA has leveraged its Housing Choice Voucher funds through innovative and creative partnerships and relationships with private sector developers and owners to create additional mixed-income communities and to reposition AHA to be a more nimble and strategic provider of affordable housing in healthier mixed-income communities. From 1994, when AHA initiated its Revitalization Program through June 30, 2008, AHA's Housing Choice Voucher funds have increased approximately 400%. During this same period, AHA has demolished approximately 10,000 distressed and obsolete public housing units.

Faced with the continuing deterioration of its obsolete public housing projects; escalating crime associated with concentrated poverty in these housing projects; the costs of managing and repairing these obsolete housing projects outpacing the associated revenues; and an increasing demand by AHA-assisted households and Atlanta citizens for better living conditions, AHA accelerated the pace of its strategic plan to end concentrating low-income households in distressed and obsolete housing projects through QLI.

As of the fiscal year that ended on June 30, 2008, AHA successfully accomplished the relocation of affected households from the first phase of QLI (i.e. Leila Valley, Jonesboro South, Jonesboro North, U-Rescue Villa and Englewood Manor) and substantially completed the demolition of those housing projects. During the same period, HUD had approved the demolition of Bowen Homes, a housing project in the second phase of QLI, and AHA was engaged in the relocation of affected households from Bowen Homes. After July 1, 2008, the beginning of AHA's 2009 fiscal year, HUD approved the second phase of QLI demolition applications for Bankhead Courts, Herndon Homes, Hollywood Courts, Thomasville Heights, Palmer House and Roosevelt House. Relocation of affected households at all of these housing projects, except Palmer House and Roosevelt House, commenced and was underway. General relocation activities at Palmer House and Roosevelt House will commence in May 2009.

By June 30, 2010, AHA will have closed the door on concentrating households in obsolete, distressed and dysfunctional large family public housing projects. Upon closing that door, AHA will own 11 senior high-rise buildings and two small family public housing-assisted developments – Martin Street Plaza (60 units) and Westminster Apartments (32 units), all of which are located in economically integrated neighborhoods. Each of these communities will continue to be owned by AHA and comprehensively managed by professional private management firms in accordance with AHA's goals, objectives and financial resources. During the next three years, AHA intends to use the authority under its MTW Agreement to reposition these properties with the goal of substantially improved quality of life, with increased emphasis on supportive services for elderly and persons with disabilities.

The preceding summary, in highlighting AHA's progress under MTW, emphasizes the importance of understanding the positive impact of AHA's MTW statutory and regulatory relief. EuQuant, formerly Boston Research Group, is continuing its research in benchmarking that progress through the next fiscal year. Since the interim report, which reported EuQuant's findings through June 30, 2006, there have been significant changes in AHA's strategies to accelerate QLI activities, enter into different partnership strategies and arrangements like Project Based Rental Assistance, realign its administrative structure by forming a dedicated asset management function and implement new policies that benefit assisted families. With that understanding it is also important to examine EuQuant's major findings as EuQuant continues its research

and lays the groundwork for its final report for the period ending June 30, 2010. To this end, Dr. Thomas D. Boston prepared the following progress report.[1]

Moving to Work Benchmarking Study Progress Report

This progress report provides an overview of EuQuant's research of AHA's initiatives and activities under the Moving to Work (MTW) Demonstration Program. AHA negotiated and entered into an MTW Agreement with HUD in September 2003, which was effective July 1, 2003 and it runs through June 30, 2010. In early 2004, AHA engaged EuQuant, formerly Boston Research Group, to provide three research reports benchmarking AHA's progress and effectiveness in utilizing its statutory and regulatory relief as an MTW agency under the MTW Agreement. EuQuant has issued two reports, a baseline report as of June 30, 2004 which was released in 2006 and an interim report as of June 30, 2007 which was released in 2008. The final report in this series will be issued in the fall of 2010 for the period ending June 30, 2010.

In the time between EuQuant's interim report and this progress report, HUD approved AHA's amended and restated MTW Agreement which extends the term of AHA's statutory and regulatory relief through June 30, 2018. In addition, as stated in the preceding section, AHA has made significant changes in its MTW strategies. Among its new strategic initiatives are the following: the Quality of Life Initiative (QLI), strategic partnerships and arrangements such as its Project Based Rental Assistance, and the realignment of its administrative structure by forming a dedicated asset management function. The benefits to families associated with these new initiatives will be examined by EuQuant in the final report in this series to be released in the Summer of 2010.

The major findings of EuQuant's ongoing MTW Benchmarking Study are listed here.

1. In 1995, 47% of assisted households lived in public housing developments, 33% used Housing Choice vouchers and 20% lived in properties primarily serving the elderly. By 2007, only 15% of households lived in public housing developments while 57% used Housing Choice vouchers, 9% lived in new mixed-income revitalized communities, 18% lived in properties primarily serving the elderly, and 2% lived in project based rental assisted properties.

[1] Dr. Thomas D. Boston is a Professor of Economics at Georgia Institute of Technology and President of EuQuant, Inc.; an Atlanta based economic and statistical consulting company. Dr. Boston is a graduate of Cornell University where he received the Ph.D. Degree in Economics. His research centers on the economics of entrepreneurship, public housing, and community development. He is former President of the National Economic Association, past editor of The Review of Black Political Economy and past Senior Economist to the Joint Economic Committee of Congress. Dr. Boston has published research, working papers and monographs on public housing assistance including a recent article, "The Effects of Revitalization on Public Housing Residents," in the Journal of the American Planning Association (Autumn 2005, vol.71. no. 4).

2. To measure neighborhood quality the study used a Community Attribute Index (CAI). This is a multi-dimensional metric that contains 15 variables that best describe the characteristics of neighborhoods. The variables were grouped under the following categories: economic opportunity, poverty status, educational attainment, housing and population characteristics, family stability and crime. The study found that the large scale relocation of families from public housing developments to mainstream market rate housing (using the Housing Choice tenant-based voucher program), to mixed-income communities and to project based rental assisted properties allowed families to live in better neighborhoods. In those neighborhoods assisted families received higher quality housing services and gained access to opportunities that enhanced their upward mobility. As a result, voucher recipients and residents of mixed-income communities displayed significant improvements in self-sufficiency. In contrast, families who relocated from one public housing development to another development experienced the smallest improvement in neighborhood quality and attained the lowest increase in economic self-sufficiency.

3. AHA's Revitalization Program did not cause assisted families to lose housing assistance. To examine this, EuQuant employed a quasi-experimental research design in which we established a control group (that consisted of assisted families who lived in six public housing developments that were not revitalized) and a treatment group (that consisted of assisted families who lived in six public housing developments that were revitalized into mixed-income communities). The groups had similar characteristics in 1995. We measured the difference in attrition rates over time in order to determine if they varied significantly between the groups. Families were tracked longitudinally and observations were recorded in 1995, 2001, 2004 and 2007. The research results showed that there was no statistically significant difference in attrition between the control group and the treatment group. Therefore, families affected by revitalization (the treatment group) did not experience a greater loss of housing assistance than did families who were not affected by revitalization.

4. EuQuant examined Atlanta Public School 3rd and 5th graders whose families received AHA housing assistance. Students whose families lived in market rate housing (with the assistance of voucher) and students whose families lived in mixed-income communities performed significantly better in school when compared to children who lived in public housing developments. A regression analysis revealed that school quality (as measured by the performance of all students in the school) explained 44.0% of the variation in how students performed on a national standardized test. The conclusion is the housing opportunities created by Housing Choice vouchers and the mixed-income communities gave students access to better performing schools. Once enrolled, the children in these two housing categories performed better in comparison to children whose families lived in public housing projects.

5. A Benefit-Cost analysis found that the net benefit to society of the initial 13 phases of mixed-income developments sponsored by AHA was $1.6 billion. The analysis considered the fixed costs of constructing each mixed-income development phase and the on-going operating costs and revenues. Other non-financial benefits and costs associated with mixed-income communities in comparison to public housing developments were monetized. These included the net benefit of living in better quality housing, reducing crime and improving school quality. The average net social benefit of each revitalized mixed-income community was $123 million and the benefit-cost ratio was 1.58 to 1. (This finding will be discussed in greater detail later in this report.)

6. It is generally believed that assisted families who use Housing Choice vouchers or those who live in mixed-income communities are more highly motivated toward self-improvement than are families who live in public housing developments. We used an advanced statistical procedure to control for this selectivity bias. Having done so, we found that households in the Housing Choice voucher program had an average gain in household income that was $1,427 greater than the household income of identical households who lived in public housing. Likewise, the average gain in household income of households who lived in mixed-income communities was $2,915 greater than the household income of identical households who lived in public housing developments.

Forward Outlook to 2010

As stated above, EuQuant found that AHA has made significant progress in utilizing the statutory and regulatory relief granted under its MTW Agreement. In its June 30, 2010 report, EuQuant will examine the impact of QLI, AHA's priority initiative to "end the practice of concentrating households in obsolete, distressed and dysfunctional large family public housing projects." We will also investigate the effectiveness of other policies that have been designed to benefit assisted families. Included among these other policies are the following: the 30% of adjusted income limit on the total amount assisted families pay for rent and utilities; AHA Payment Standards (which are not tied to HUD's Fair Market Rents but are instead tied to the market conditions in defined submarkets in the City of Atlanta); rent simplification measures; and the growth of Project Based Rental Assistance. Of course, EuQuant will continue to update and examine the progress AHA assisted families are making towards greater self-sufficiency.

Benchmarking Against Current Economic Conditions and Their Impact

The current recession began in December 2007. Since then, U.S. economic activity has declined so sharply that this recession may ultimately rank second only to the Great Depression. During the first and second

quarters of 2008, GDP growth (i.e. Gross Domestic Product or the total value of goods and services produced in the economy during the year) was very anemic; 2% and 2.8% respectively. Then in the third quarter, GDP began to contract and by the end of the fourth quarter it had plummeted by 3.8%. At its current pace, GDP will have declined by over 6% during the year. Additionally, the economic decline that began in the housing sector has since spread to the financial sector, manufacturing sector and more recently the services sector. New data suggest that US economic conditions have contributed significantly to a global recession. Not since 1940 has world economic output declined by as much as it is expected to decline over the coming year.

Georgia's economy is among the most troubled in the nation. Its rate of job loss and number of bank failures are the second-highest in the country. The bank failures are caused by a growing number of home mortgage defaults and delinquent loan payments. Georgia is second to California in the number of bank failures; 7 and 8 respectively. Weaknesses in employment growth and spending in Georgia and the Atlanta Metro area are occurring broadly. The industries that have experienced the most significant declines in employment over the last year are manufacturing (7.4%), construction (7.0%), and professional and business services (4.7%). The overall reduction in employment for all industries was 2.2%. Most other industries lost employment at a rate that was equal to or slightly below the industry average. This included leisure and hospitality (2.1%); financial services (1.0%); and trade, transportation and utilities (1.6%). Only education and health services recorded increases in employment over the last year (2.2%).

Given these circumstances, it is fitting to ask how AHA's CATALYST Business Plan and Quality of Life Initiative might be affected by current economic conditions. We answer this question by reviewing economic development at the national, state and local levels.

Potential Impact of Economic Downturn on AHA-Assisted Households

One of AHA's eligibility policies under its CATALYST Business Plan is the work/program participation policy. This policy requires that at least one adult member (18 to 61 years age) of any AHA-assisted household, must be employed full-time in the labor market for 30 or more hours each week. This policy excludes elderly members (62 or older) and persons with disabilities. Other eligible adult members must be working full-time, pursuing some educational or vocational training on a full-time basis or have a combination of part-time employment and education/training. EuQuant's interim MTW report tracked data periodically between 1995 and 2007. The report showed that employment of AHA adults increased significantly between 1995 (when it averaged 21%) and 2007 (when it averaged 53%). The data also indicated that employment may have been sensitive to the cyclical downturn in the economy that occurred in 2001.

More specifically, the table below indicates that there have been two peaks in employment of AHA assisted families; one occurred in 2001 and a second in 2007. The implementation of AHA's work/program participation policy occurred after the 2004 observation in the table. Following the initial peak in 2001, the percent of AHA adults employed decreased three percentage points by 2004. It is unclear how much of this decline may be attributed to the 2001 recession and the more slowly growing economy that followed the end of the IT expansion. That expansion fueled rapid economic growth from 1991 until 2001.

The current recession is more severe and has caused employment reductions in all sectors of Georgia's economy, with the exception of health and education. Metro Atlanta's unemployment rate in January 2009 was 8.4% while the unemployment rate for the State was 7.5%. The national unemployment rate masks the fact that today there are 7.8 million part-time workers who would prefer to be employed full-time and 734,000 unemployed workers who have become so discouraged they have given up searching for employment. Employment conditions in Georgia and in the nation vary substantially by demographic groups. For example, in 2007 the State's unemployment rate was 8.1% while the African-American unemployment rate was 12.4%. Persons who had less than a high school degree experienced an average unemployment rate of 20.6% and high school graduates experience an unemployment rate of 9.5%. In contrast, the unemployment rate for persons with college degrees was just 2.9%.

The 2010 report will examine whether or not these economic developments have affected employment rates among AHA assisted families and if so, how. It will also document the extent to which AHA's work/program participation and related supportive services may have in off-setting the downward cyclical pressure on employment.

Employment Rate for Various Types of Housing Assistance by AHA
Source: EuQuant, Inc.

Type of Housing Assistance	1995	1998	2001	2004	2007
Average Employment Rate	**21%**	**35%**	**41%**	**38%**	**53%**
Public Housing Developments	16%	26%	29%	25%	52%
Mixed Income Properties	-	56%	68%	62%	64%
Vouchers: City of Atlanta	26%	37%	41%	38%	54%
Vouchers: Rest of Atlanta Metro	30%	43%	47%	44%	48%

Declining Home Sales will make Affordable Rental Opportunities More Available

The current recession has its roots in the collapse of the housing sector. The latter was facilitated by speculative investment instruments such as mortgage-backed securities and credit default swaps. The nation's housing sector, and more specifically Atlanta's real estate market, continues to be stressed as inventories of

unsold homes remain high. The weakened state of Atlanta's housing market places mounting pressure on local financial institutions. This condition is made worse by tightened credit markets. In 2007 multifamily building permits issued in Georgia decreased by 2.5%. During the same period, single family home permits declined by 36.4%. The decline in multifamily permits during the second quarter of 2008 reached 68.1%. Also, the number of third-quarter 2008 multi-family permits declined by 54.2%. Home prices have also declined significantly. In 2006 the home price index increased by 5.1% but during the third-quarter 2008, the home price index declined by .6%. In essence, housing market signs do not reveal that the market has bottomed out yet.

While difficulties in the housing market have caused significant problems for builders, the financial sector and the economy in general, one of the few bright spots of the economic downturn is that new affordable rental opportunities have become more available to families using Housing Choice vouchers. This is important because the significant relocation activity that is currently taking place among AHA-assisted households is accomplished increasingly with Housing Choice vouchers.

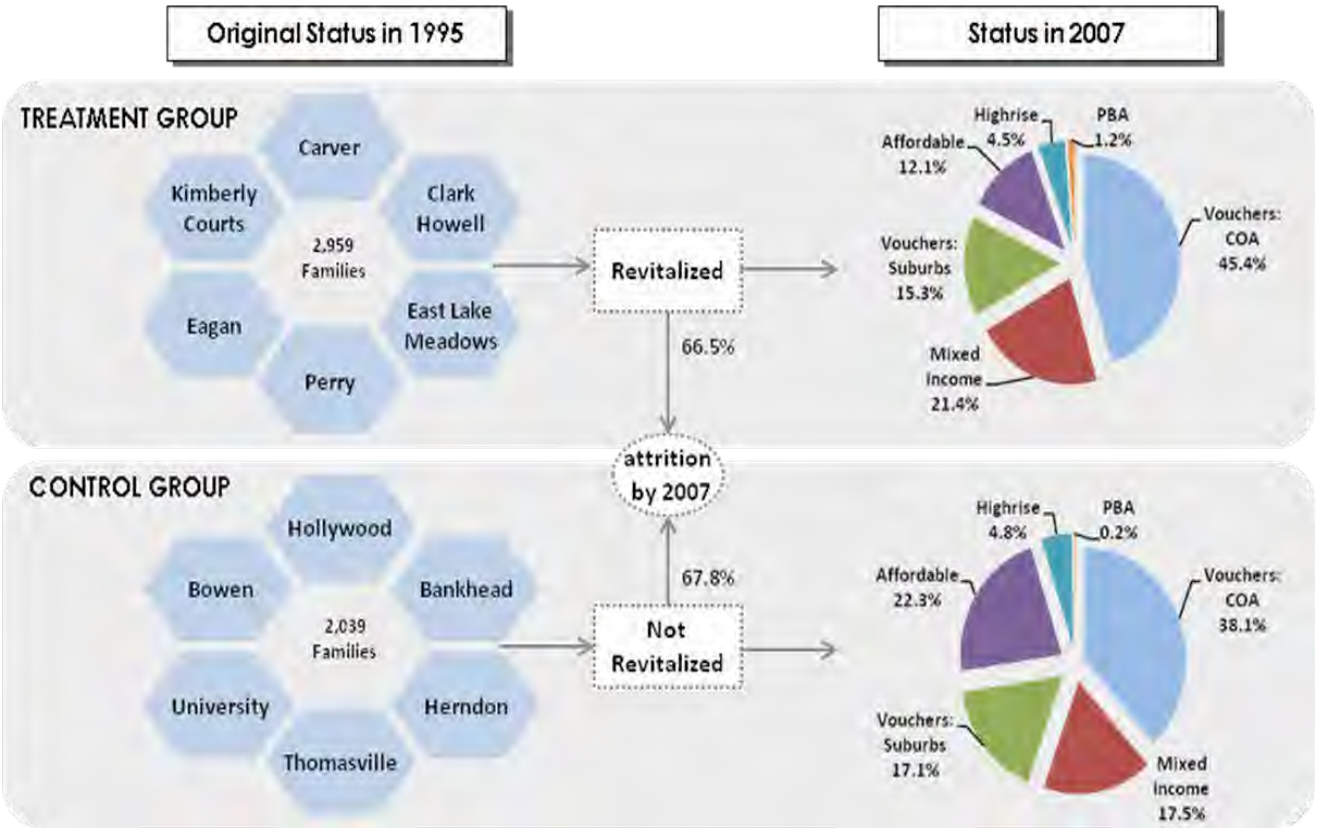
Following the approved demolition of public housing developments, AHA families are provided relocation assistance and have the option of choosing Housing Choice vouchers, project based rental assistance, a mixed income community or other public housing developments. AHA's CATALYST Business Plan made Housing Choice vouchers increasingly available to AHA-assisted families; even to those families who lived in public housing developments that were not demolished by 2007.

The table below tracks the relocation decisions of families who lived in six public housing developments that were revitalized after 1995 (the treatment group) and families who lived in six developments that were not revitalized between 1995 and 2007 (the control group). The table reveals two facts. First, revitalization of public housing developments did not cause affected families to experience a higher annual attrition rate (that is, a greater exit from AHA-assisted housing) than was the case among families who were not affected by revitalization. Second, by 2007 Housing Choice vouchers were used by 61% of treatment group families (all such families had to relocate because of revitalization) and by 55% of control group families. The latter group did not have to relocate because of revitalization. 2,959 treatment group families lived in public housing units in 1995 as did 2,039 families in the control group in 1995. By 2001, 50% of the original treatment families were still active with AHA as were 50% of the control group families. By 2007 there were 991 treatment group families still active and 656 control group families still active. Hence, 33.5% of the original treatment group families remained active while 32.2% of the control group families did so. This means that the annual attrition rates between the groups did not differ by a statistically significant amount. More precisely, annual attrition rates for the treatment group and the control group over the observation period were 11.5% and 12.0% respectively.

Finally, the soft housing and real estate markets have opened new opportunities to AHA-assisted families and allowed them access to quality affordable housing in neighborhoods throughout Atlanta and the Metropolitan area. By 2007, 19% of AHA assisted families lived outside of the Atlanta City limits. Affordable rental opportunities provide families greater access to housing in more diverse neighborhoods of the Atlanta Metro area.

What Happened to Families when Developments were Revitalized?

Source: EuQuant, Inc.



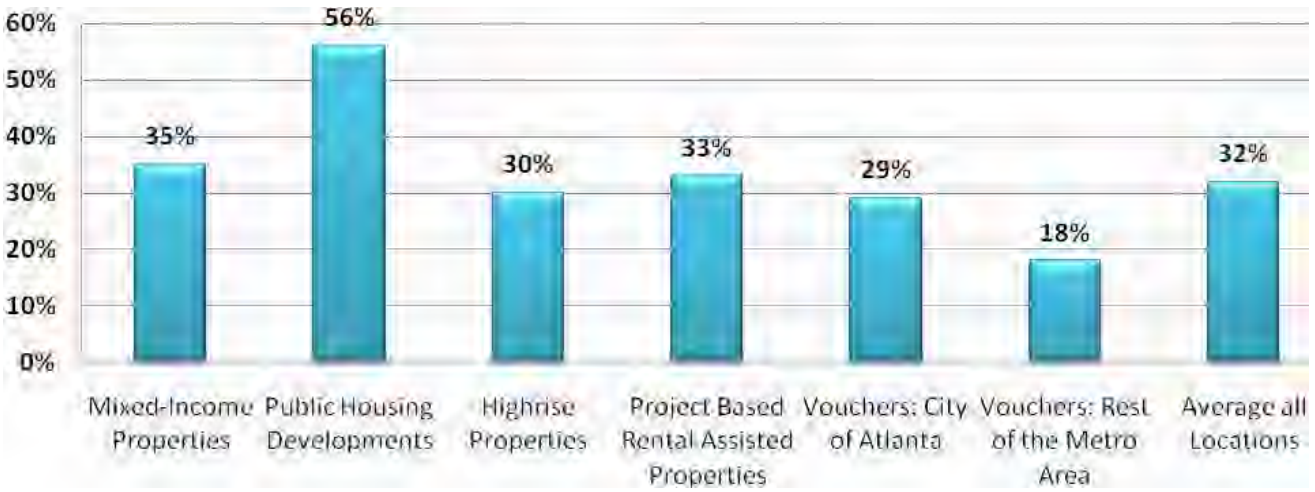
Housing Choice Vouchers Provide Residents Access to Better Neighborhoods

In 2007, the average poverty rate of census tracts where public housing developments were located was 56.0%; it was 29.0% in census tracts where Housing Choice voucher participants lived in the City of Atlanta and 18.0% in census tracts where Housing Choice voucher participants lived in suburban areas of Metropolitan Atlanta. By making affordable market rate rental housing more available to Housing Choice

voucher participants, the economic downturn has created more opportunities for AHA-assisted households to move to better neighborhoods; where the latter is measured by poverty level, median income, school performance and home values. The figures in the table on the following page indicate the characteristics of neighborhoods where families resided in 2007 and the type of housing assistance associated with their places of residence. The figures demonstrate that Housing Choice vouchers are used in neighborhoods whose characteristics are much better in comparison to the neighborhoods where public housing developments are located.

Poverty Rates in Census Tracts

Where Families Receiving AHA Housing Assistance Resided in 2007



Source: EuQuant, Inc.

Neighborhood Characteristics where Families Lived in 2007

	Median HH Income	ITBS 5th Grade Percentile	2004 Average Price of Single Family Home
Mixed-Income Properties	$22,138	42	$232,027
Public Housing Developments	$17,584	40	$193,554
Highrise Properties	$30,099	52	$269,385
Project Based Rental Assisted Properties	$20,384	44	$177,441
Vouchers within the City of Atlanta	$27,698	44	$190,542
Vouchers within the rest of Metro Atlanta	$35,350	46	$157,481
Average all locations	**$27,331**	**45**	**$201,645**

Source: EuQuant, Inc.

Mixed-Income Financing may be more Difficult to Secure in the Short Run

In Georgia, the asset quality of banks has decreased significantly while past due loans as a percent of all loans have increased. In 2006, past due loans in Georgia banks as a percent of all loans was 1.6 %. In the third-quarter of 2008 this increased to 3.9%. During the same period, the percent of net loan losses to total loans increased from .08% to .36%. Finally, median Tier 1 leverage (the so-called stress test) declined from 9.55% to 9.28%. Together this means that Georgia's banks are experiencing significant turmoil. This explains why the state is ranked second in the number of bank defaults. Unfortunately, this also means that the capital needed to finance mixed income developments by AHA and its private sector development partners may be more challenging to secure. This challenge may diminish as the President's plan to stimulate the economy and recapitalize banks gains more traction in the economy as a whole.

AHA's Revitalization Program seeks to rebuild communities beyond the footprint of the old public housing project. The elements of a typical revitalization include a new mixed-income multi-family development (where typically 40% of all units are reserved for AHA-assisted families), new or greatly improved neighborhood schools, an early learning center, a new YMCA, new recreational and community facilities, the creation of affordable homeownership opportunities, the relocation of families using a combination of Housing Choice vouchers, and the provision of a broad range of job training and life skills programs for adults and social programs targeted to at-risk youths. A benefit-cost analysis of six public housing developments that represented the first 13 development phases that were revitalized into mixed-income communities indicates that the net social benefit was $740 million and society received $1.58 in benefits for every dollar of cost incurred. The average net social benefit of revitalizing a single community was $123 million. Therefore, AHA's Revitalization Program and its CATALYST Business Plan created a net social benefit of $1.6 billion.

In light of the large social return on investment, it remains to be seen whether it will become more difficult to secure the equity and debt financing that is needed to initiate or complete mixed-income revitalization.

Part XIII:
MTW Annual Plan Reporting Requirements

"Home makes me think of family…family means gathering, laughter and just chilling out together."
∗Carole Jean Green∗

MTW ANNUAL PLAN REPORTING REQUIREMENTS

ANNUAL PLAN	REQUIREMENT	LOCATION
I. HOUSEHOLDS SERVED		
	A. Number and characteristics of households served at beginning of period, by: *- unit size* *- family type (family vs. elderly or disabled* *- income group (<30: 30-50; 50-80;>80)* *- housing type (LRPH; leased, other)* *- race & ethnicity*	*N/A for FY 2010 Plan* [1] Although not required, see Appendix K – Housing Opportunities Data.
	B. Identify number and characteristics of households on waiting lists (all housing types). Discuss waiting list issues and proposed actions	*Same as above.*
	C. Number projected to be served at end of period	*Same as above.*
	D. Narrative discussion/explanation of change	*Same as above.*
II. OCCUPANCY POLICIES		
	A. Statement of policies governing eligibility, selection, admissions, assignment, and occupancy of families, including the admissions policy under section 16(a)(3)(B) for deconcentration of lower-	*Appendices P & Q*

[1] *As part of the approval of AHA's FY 2006 CATALYST Implementation Plan, HUD approved AHA to replace this information with its MTW Benchmarking Study being conducted by EuQuant (formerly Boston Research Group, Inc.) The study will include three reports: an FY 2006 Baseline Report, an FY 2008 Interim Report and an FY 2010 Final Report. The FY 2008 Interim Report was included in AHA's FY 2008 MTW Annual Report and the 2010 Final Report will be included in AHA's FY 2010 MTW Annual Report.*

MTW ANNUAL PLAN REPORTING REQUIREMENTS

ANNUAL PLAN	REQUIREMENT	LOCATION
	income families	
	B. Statement of Rent Policy	*Appendices P & Q*
III. CHANGES IN THE HOUSING STOCK		
	A. Number of units in inventory at beginning of period by program (LRPH, leased, other)	*No longer required.* [2] Although not required, see Appendix K – Housing Opportunities Data.
	▪ *Projected number at end of period by program*	*Same as above.*
IV. SOURCES AND AMOUNTS OF FUNDING		
	A. Identify/discuss all sources and amounts of funding included in consolidated budget statement	*Appendix L*
	B. Identify/discuss sources, amounts, and planned uses of special purpose funds outside the consolidated budget (e.g., DEP)	*Same as above.*
	C. Consolidated Budget Statement	*Same as above.*
V. USES OF FUNDS		
Need to note in Appendix L that final budget is not submitted in Plan. Once the final Plan is submitted it will included the information for items C and D	*A. Previous year expenditures by line item*	*Appendix N*
	B. Planned expenditures by line item	*Appendix L*
	C. Description of proposed activities/investments by line item/explanation of change from previously approved plan	*Same as above. See Annual Budget discussion under Corporate Support*
	D. Reserve balance at beginning of year. Discuss adequacy of reserves.	*Same as above.*
VI. CAPITAL PLANNING		
	A. Describe major capital needs and projects, estimated costs, and proposed timetables	*Appendix M*
	B. Identify planned expenditures	*Same as above.*

[2] *As part of the approval of AHA's FY 2006 CATALYST Implementation Plan, HUD approved elimination of the requirement for AHA to provide this information as part of its annual plans.*

MTW ANNUAL PLAN REPORTING REQUIREMENTS

ANNUAL PLAN	REQUIREMENT	LOCATION
	C. Demolition and Disposition Requests, if planned	*Appendices F Part II, III, and VI of Plan*
	D. Homeownership activities, if any	*Part II of Plan*
VII. MANAGEMENT INFORMATION FOR OWNED/MANAGED UNITS		
A. VACANCY (OCCUPANCY) RATES		
	1. Occupancy rates by property beginning of period	*Appendix H*
	2. Narrative: issues and proposed action	*Same as above.*
	3. Target rates by property at end of period	*Same as above.*
B. RENT COLLECTIONS		
	1. Rents uncollected (%) beginning of period	*Appendix H*
	2. Narrative: issues and proposed actions	*Same as above.*
	3. Target % at end of period	*Same as above.*
C. WORK ORDERS		
	1. Response rates beginning of period • *% emergency within 24 hrs* • *% regular within 30 days*	*Appendix H*
	2. Narrative: issues and proposed actions	*Same as above.*
	3. Target rates at end of period	*Same as above.*
D. INSPECTIONS		
	1. Description of inspection strategy	*Appendix H*
	2. Planned inspections (% this FY)	*Same as above.*
E. SECURITY		
	1. Narrative: security issues and proposed Actions	*Appendix H*
VIII. MANAGEMENT INFORMATION FOR LEASED HOUSING		
A. LEASING INFORMATION		
	1. Units under lease (%) beginning of period	*No longer required.* [3] Although not required, see

[3] *As part of the approval of AHA's FY 2006 CATALYST Implementation Plan, HUD approved elimination of the requirement for AHA to provide this information as part of its annual plans.*

MTW ANNUAL PLAN REPORTING REQUIREMENTS

ANNUAL PLAN	REQUIREMENT	LOCATION
		Appendix K – Housing Opportunities Data.
	2. Target lease up rate at end of period	*Same as above.*
	3. Plans regarding: *Ensuring rent reasonableness* *Expanding housing opportunities* *Deconcentration of low-income families*	*Appendices I,* *Part II, III, IV, and V of Plan*
	4. Issues and proposed actions	*No longer required.*[3] *(Although not required, see the above referenced sections)*
B. INSPECTION STRATEGY		
	1. Description of inspection strategy, including: *a) Planned inspections completed (% this FY) by category:* ▪ *Annual HQS Inspections* ▪ *Pre-contract HQS Inspections* ▪ *HQS Quality Control Inspections* *b) HQS Enforcement*	*Appendix H & I*
IX. RESIDENT PROGRAMS		
	1. Description of activities	*Parts VII of Plan*
	2. Issues and proposed actions	*Parts VII of Plan*
X. OTHER INFORMATION AS REQUIRED BY HUD		
	A. Board Resolution Adopting Plan Certifying that Public Hearing Requirements were met	*Appendix A*
	B. Required Certifications and other submissions from which the Agency is not exempted by the MTW Agreement	*Appendix A and B*
	▪ *Submissions required for the receipt of funds*	*Appendix S*

“There’s no place like home…how splendid! The splendor is in the sanctuary it provides…the memories it holds…and the love that abides…There is no place like home!”

∗Adrienne Walker∗

PART XIV:
AHA LEADERSHIP

Since 1994, when Renée Lewis Glover joined AHA as its President and Chief Executive Officer, AHA has undergone a transformation from a bloated and broken public housing authority to a diversified real estate company, with a public mission and purpose. As part of this transformation, AHA has undergone a sea change in how it addresses the need for affordable housing by persons who earn minimum wage up to 80% of adjusted income. AHA's vision is Healthy Mixed-Income Communities. At June 30, 2010, AHA will close the door on the era of warehousing poor families in obsolete and distressed public housing projects. The transformation has been led and strategically implemented by Glover and her leadership team.

Glover has received numerous recognitions over the years. Glover was honored with the Turner Broadcasting Downtown Community Service Award in March 2007. On December 17, 2005, the "Masked" Award was presented to Ms. Glover by the United Negro College Fund, Inc., and the African Heritage Foundation, in appreciation for her support of UNCF and the 22nd Anniversary Mayor's Masked Ball. In July 2003, Glover was chosen by the Atlanta History Center as one of Atlanta's Defining Women. She was named Public Official of the Year 2002 by Governing Magazine. In June 2002, a collaboration among the Center for American Women in Politics, the Ford Foundation and the Council for Excellence in Government recognized Glover as one of the top ten American women in government. Glover has also been featured in Atlanta Women Speak, an anthology of speeches from Atlanta's political and corporate leadership. She was also honored with the Dan Sweat Community Leadership Award from the Urban Land Institute in 1998.

Glover served on the National Advisory Council of Fannie Mae and was appointed by the United States Congress to the Millennial Housing Commission in 2000, charged with providing legislative recommendations to Congress on national housing policy. In 2007, Glover became a Fellow of the National Academy of Public Administration.

Glover currently serves as a member of the Board of Directors of the Federal Reserve Bank of Atlanta and the International Board of Directors of Habitat for Humanity.

Including Ms. Glover, AHA's executive management team consists of eight Senior Executives, eleven Vice Presidents and a private sector Executive Program Manager who are responsible for guiding the day-to-day operations of AHA in accordance with AHA's Business Plan. A brief introduction of each of these professionals follows.

Renée Lewis Glover, President and Chief Executive Officer

Renée Lewis Glover joined the Atlanta Housing Authority (AHA) as CEO in September 1994. Glover has been nationally recognized for her role in transforming U.S. urban policy. At AHA, Glover pioneered master-planned, mixed finance, mixed-income residential development, and reorganized AHA to become a diversified real estate company, with a public policy and service-oriented mission. Her efforts have rebuilt entire communities from the ground up, and in creating a replicable model for redevelopment, Glover has helped cities across the country transform their urban landscapes. Prior to joining AHA, Glover was a corporate finance attorney in Atlanta and New York City. She received her Juris Doctorate from Boston University, her Master's degree from Yale University and her Bachelor of Arts from Fisk University.

Nick Farsi, Chief Information Officer

Nick Farsi is a senior Information Technology executive with over 20 years of diversified experience in Retail, Telecomm, E-Commerce, Real Estate and Web Hosting. As Chief Information Officer for AHA, Mr. Farsi is leading initiatives that create Information Technology strategies which will transform how AHA does business in the 21st century.

Joy Fitzgerald, Chief Operating Officer, Real Estate Development & Acquisitions

Joy Fitzgerald has more than 25 years of experience in affordable housing and mixed-income revitalization, having served for ten years as the Executive Director of the Houston Housing Authority and for four years as the Director of Affordable Housing for the Georgia Housing Finance Agency before joining AHA. Ms. Fitzgerald provides leadership to AHA's repositioning strategy and oversees the strategic planning and implementation for all AHA redevelopment and acquisition projects.

Gloria J. Green, General Counsel & Chief Legal Officer

Gloria J. Green's legal career includes serving as an Attorney with the Securities and Exchange Commission in the Office of General Counsel, Washington, D.C. and in the Division of Enforcement, Atlanta Regional Office, and Vice President, Deputy General Counsel and Director of Legal Services for the Federal Home Loan Bank of Atlanta where she directed the day-to-day activities of the Legal Department. Ms. Green is a graduate of Duke University in Durham, N.C. and holds a Juris Doctorate degree from Georgetown University Law Center, in Washington, DC. As an integral member of AHA's executive management team, Ms. Green manages the Legal Department which provides legal services to support the implementation of AHA's Business Plan.

Mark Kemp, Senior Vice President of Operations

Mark Kemp has over 20 years of strategically mastering progressive action programs and solution-driven projects using innovative approaches to various operational and corporate initiatives in housing and educational environments. As an objective and constructive resource, Mark focuses on balancing AHA's resources through practical application of measures in order to drive strategies, improve efficiencies, and contain costs. Within AHA, Mr. Kemp is currently leading the Operations division of the agency, which includes Real Estate Management and Housing Choice Operations, as well as the related business systems for their support.

Steve Nolan, CPA, Chief Financial Officer

Steve Nolan has over 15 years of accounting and auditing experience in the HUD regulated environment which has provided him with expertise in the fields of nonprofit organizations, single audits of government financial assistance programs, and HUD and real estate accounting. He also is a Certified Public Account (CPA) and has experience in analyzing and developing systems of internal control, evaluating accounting systems, and developing and implementing accounting procedures for large and small housing authorities. Mr. Nolan provides leadership to financial reforms to make AHA a more economically viable business.

E. Mike Proctor, Ph.D., Chief Operating Officer, Asset Management and Policy Development

E. Mike Proctor provides leadership in the areas of policy (where he serves as AHA's Chief Policy Officer), asset management, research and evaluation and new business opportunities. Dr. Proctor has over 30 years experience in housing programs, housing finance, and community development and revitalization. He received his doctorate with a specialty in public policy and administration from Georgia State University. As a Fannie Mae Foundation Fellow he focused on affordable housing issues at Harvard's Joint Center for Housing Studies and has sat on various panels at the request of the Joint Center. Dr. Proctor is also a graduate of the Harvard Senior Executives in State and Local Government Program at the John F. Kennedy School of Government. Dr. Proctor currently serves on the Community Coalition Board of the Morehouse School of Medicine's Prevention Research Center and is a member of the national Prevention Research Center Program's policy committee sponsored by the U. S. Centers for Disease Control and Prevention.

Barney Simms, Chief External Affairs Officer, Community, Governmental & External Affairs

Barney Simms is an innovative and outcomes driven leader well known for connecting to the hearts and spirits of people challenged by at-risk circumstances and situations. His brand of strategic leadership, coupled with his community involvement and compassion for people, has been paramount in AHA's work in changing lives. With more than 25 years of progressive leadership as a decision maker and an advocate for senior and children issues, Mr. Simms provides the guidance for the implementation of strategies that connect AHA participants to mainstream resources and support services that bolster healthy outcomes for children, independent families and self-sufficient elderly and persons with disabilities.

Pat Jones, Executive Program Manager, Real Estate Management

Pat Jones is a Senior Vice President & Managing Principal for Draper & Associates, an Atlanta-based firm that specializes in formulating and implementing solutions to business challenges with corporate clients. Ms. Jones has 31 years of project and program management and is currently on assignment to AHA as Program Manager for Comprehensive Technical Program Management Services. She has a proven track record in managing public-private relationships. Her experience in construction and contract management enable her to maximize efficiency and quality through the use of strategic partnerships. Her project based approach to improving real estate operations is evident in the AHA's Real Estate Management division that is responsible for the agency's relationship with its private sector partners who operate AHA's Affordable Properties.

AHA Vice Presidents

Reneé Bentley, Vice President, *Housing Choice Operations*

Angela Chadwick, Deputy General Counsel

Ken Clark, Vice President, *Real Estate Transactions and Financial Operations*

Vona Cox, Vice President, *Acquisitions Management Services*

Carolyn McCrorey, Vice President, *Human Resources*

Martha McMillin, *Deputy General Counsel*

Patricia O'Connell, *Vice President, Real Estate Development*

Marion Quaye, Vice President, *Asset Management*

Suzi Reddekopp, Vice President, *Finance*

Adrienne Walker, Vice President, *Corporate Planning*

AHA Leadership and Organizational Structure

Atlanta Housing Authority

there's no place like home...

Atlanta Housing Authority

CATALYST Implementation Plan Appendices

(Fiscal Year Ending 2010)

Board Approved

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EXECUTIVE SUMMARY TO ITEM NO. EO-1

This resolution, if approved, would authorize The Housing Authority of the City of Atlanta, Georgia (AHA) to (i) submit its Fiscal Year 2010 Moving To Work Annual Implementation Plan to the United States Department of Housing and Urban Development (HUD) and to implement the projects, activities, initiatives and any policy changes described therein, and (ii) submit applications or proposals to HUD for American Recovery and Reinvestment Act of 2009 competitive grant funds, and other related matters.

PREPARED FOR THE REGULAR MEETING
OF THE BOARD OF COMMISSIONERS TO BE HELD
MONDAY, MARCH 30, 2009

ITEM NO. EO-1:

To consider and act upon a resolution authorizing The Housing Authority of the City of Atlanta, Georgia (AHA) to (i) submit its Fiscal Year 2010 Moving To Work Annual Implementation Plan to the United States Department of Housing and Urban Development (HUD) and to implement the projects, activities, initiatives and any policy changes described therein, and (ii) submit applications or proposals to HUD for American Recovery and Reinvestment Act of 2009 competitive grant funds, and other related matters.

EXPLANATION

The Housing Authority of the City of Atlanta, Georgia (AHA) executed its Amended and Restated Moving to Work Agreement, effective as of November 13, 2008, as further amended by that certain Second Amendment to the Moving to Work Agreement, effective as of January 16, 2009 (MTW Agreement) with the United States Department of Housing and Urban Development (HUD). The MTW Agreement is effective through June 30, 2018, unless further extended. The MTW Agreement requires AHA to submit an MTW annual plan to HUD in lieu of the Five-Year Plan and Annual Plan traditionally required by Section 5A of the U. S. Housing Act of 1937, as amended. Each year during the MTW demonstration period, an MTW annual plan must be submitted to HUD with a board resolution approving the plan and certifying that a public hearing has been held regarding the plan.

AHA has prepared its Fiscal Year (FY) 2010 MTW Annual Implementation Plan (also referred to herein as the FY 2010 CATALYST Implementation Plan). The FY 2010 CATALYST Implementation Plan identifies AHA's priorities, projects, activities, and initiatives for FY 2010, and any policy changes to the Statement of Corporate Policies Governing the Leasing and Residency of Assisted Apartments and the Statement of Policies Governing the Housing Choice Tenant-Based Program to be implemented during FY 2010. During FY 2010, AHA will also continue to improve and strengthen its corporate infrastructure, financial and reporting systems, information technology environment, and human resources. These activities are described as Corporate Support. A high level executive summary of the projects, activities, initiatives and any policy changes that will be implemented during FY 2010 is attached as Exhibit EO-1-A.

On February 17, 2009, President Obama signed the American Recovery and Reinvestment Act of 2009 (Recovery Act) which provides a $4 billion appropriation of capital funds to carry out capital improvements and other investment activities for local housing agencies. The Recovery Act provides that approximately $3 billion of these funds will be distributed through a capital fund formula and the remaining $1 billion will be distributed through a competitive process. HUD has notified AHA that it will receive approximately $26.5 million using the capital fund formula that was used to calculate capital fund grants in 2008. AHA intends to compete for additional funds in

the competitive process. AHA must obligate 100% of the funds within one year of March 18, 2009, must expend at least 60% of funds within two years of such date, and must expend 100% of the funds within three years of such date. AHA intends to use Recovery Act funds for program activities currently identified in AHA's FY 2010 CATALYST Implementation Plan as described in Exhibit EO-1-A, subject to the limitations governing eligible priorities and activities under the Recovery Act and related regulatory guidance.

AHA's FY 2010 CATALYST Implementation Plan is the product of an inclusive and comprehensive planning process involving numerous hours of planning and consultation with AHA's Board of Commissioners, AHA's Senior Management team, Resident Association presidents, AHA Advisory Board groups, Public Housing Assisted residents, Housing Choice participants, AHA employees, the Georgia Law Center for the Homeless, Atlanta Legal Aid, local political and government officials and other members of the public. Comments and suggestions were made at those various meetings, all of which were considered by AHA. The consultation process included a properly advertised and noticed public hearing conducted by Commissioner James Brown, on behalf of AHA's Board of Commissioners, on March 12, 2009.

AHA is now requesting the Board of Commissioners to approve its FY 2010 CATALYST Implementation Plan and authorize the submission of its FY 2010 CATALYST Implementation Plan to HUD and to approve the implementation of the projects, activities, initiatives and any policy changes set forth in the FY 2010 CATALYST Implementation Plan. AHA is also requesting the Board of Commissioners to authorize AHA to take whatever steps are necessary to submit applications and/or proposals for Recovery Act competitive grant funds that HUD will distribute through a competitive process.

RESOLUTION

WHEREAS, The Housing Authority of the City of Atlanta, Georgia (AHA) executed its Amended and Restated Moving to Work Agreement, effective as of November 13, 2008, as further amended by that certain Second Amendment to the Moving to Work Agreement, effective as of January 16, 2009 (MTW Agreement) with the United States Department of Housing and Urban Development (HUD);

WHEREAS, the MTW Agreement is effective through June 30, 2018, unless further extended;

WHEREAS, the MTW Agreement requires AHA to submit an MTW annual plan to HUD in lieu of the Five-Year Plan and Annual Plan traditionally required by Section 5A of the U. S. Housing Act of 1937, as amended;

WHEREAS, each year during the MTW demonstration period, an MTW annual plan must be submitted to HUD with a board resolution approving the plan and certifying that a public hearing has been held regarding the plan;

WHEREAS, AHA has prepared its Fiscal Year (FY) 2010 MTW Annual Implementation Plan (also

referred to herein as the FY 2010 CATALYST Implementation Plan);

WHEREAS, the FY 2010 CATALYST Implementation Plan identifies AHA's priorities, projects, activities, and initiatives for FY 2010, and any policy changes to the Statement of Corporate Policies Governing the Leasing and Residency of Assisted Apartments and the Statement of Policies Governing the Housing Choice Tenant-Based Program to be implemented during FY 2010;

WHEREAS, during FY 2010, AHA will also continue to improve and strengthen its corporate infrastructure, financial and reporting systems, information technology environment, and human resources;

WHEREAS, these activities are described as Corporate Support;

WHEREAS, a high level executive summary of the projects, activities, initiatives and any policy changes that will be implemented during FY 2010 is attached as Exhibit EO-1-A;

WHEREAS, on February 17, 2009, President Obama signed the American Recovery and Reinvestment Act of 2009 (Recovery Act) which provides a $4 billion appropriation of capital funds to carry out capital improvements and other investment activities for local housing agencies;

WHEREAS, the Recovery Act provides that approximately $3 billion of these funds will be distributed through a capital fund formula and the remaining $1 billion will be distributed through a competitive process;

WHEREAS, HUD has notified AHA that it will receive approximately $26.5 million using the capital fund formula that was used to calculate capital fund grants in 2008;

WHEREAS, AHA intends to compete for additional funds in the competitive process;

WHEREAS, AHA must obligate 100% of the funds within one year of March 18, 2009, must expend at least 60% of funds within two years of such date, and must expend 100% of the funds within three years of such date;

WHEREAS, AHA intends to use Recovery Act funds for program activities currently identified in AHA's FY 2010 CATALYST Implementation Plan as described in Exhibit EO-1-A, subject to the limitations governing eligible priorities and activities under the Recovery Act and related regulatory guidance;

WHEREAS, AHA's FY 2010 CATALYST Implementation Plan is the product of an inclusive and comprehensive planning process involving numerous hours of planning and consultation with AHA's Board of Commissioners, AHA's Senior Management team, Resident Association presidents, AHA Advisory Board groups, Public Housing Assisted residents, Housing Choice participants, AHA employees, the Georgia Law Center for the Homeless, Atlanta Legal Aid, local political and government officials and other members of the public;

WHEREAS, comments and suggestions were made at those various meetings, all of which were considered by AHA;

WHEREAS, the consultation process included a properly advertised and noticed public hearing conducted by Commissioner James Brown, on behalf of AHA's Board of Commissioners, on March 12, 2009;

WHEREAS, AHA is now requesting the Board of Commissioners to approve its FY 2010 CATALYST Implementation Plan and authorize the submission of its FY 2010 CATALYST Implementation Plan to HUD and to approve the implementation of the projects, activities, initiatives and any policy changes set forth in the FY 2010 CATALYST Implementation Plan; and

WHEREAS, AHA is also requesting the Board of Commissioners to authorize AHA to take whatever steps are necessary to submit applications and/or proposals for Recovery Act competitive grant funds that HUD will distribute through a competitive process.

NOW, THEREFORE, BE IT RESOLVED BY THE BOARD OF COMMISSIONERS OF THE HOUSING AUTHORITY OF THE CITY OF ATLANTA, GEORGIA, THAT:

1. AHA's FY 2010 CATALYST Implementation Plan, including the projects, activities, initiatives and any policy changes in the Statement of Corporate Policies Governing the Leasing and Residency of Assisted Apartments and the Statement of Policies Governing the Housing Choice Tenant-Based Program described in Exhibit EO-1-A, attached hereto and incorporated herein by this reference is hereby approved.

2. Each of the Chairman or the Vice Chairman of the Board of Commissioners, when required, and the President and Chief Executive Officer are hereby authorized to execute any required documents, certifications or United States Department of Housing and Urban Development (HUD) forms related to the approval and filing of AHA's FY 2010 CATALYST Implementation Plan without further vote or approval of this Board.

3. The President and Chief Executive Officer is authorized to submit AHA's FY 2010 CATALYST Implementation Plan and such other required documents, certifications or forms to HUD with such changes, additions, corrections or amendments as she shall deem necessary or appropriate or as may be required by HUD without further vote or approval of this Board.

4. The President and Chief Executive Officer is hereby authorized to negotiate with HUD regarding any portion of AHA's FY 2010 CATALYST Implementation Plan without further vote or approval of this Board.

5. The President and Chief Executive Officer and her designees are hereby authorized to implement the projects, activities, initiatives and any policy changes set forth in the FY 2010 CATALYST Implementation Plan.

6. The President and Chief Executive Officer and her designees are hereby authorized to carry out other actions relating to the FY 2010 CATALYST Implementation Plan.

7. Each of the Chairman or Vice Chairman of the Board of Commissioners, when required, and the President and Chief Executive Officer is hereby authorized to submit applications, proposals and such other required documents, certifications or forms to HUD to compete for Recovery Act competitive grant funds that HUD will distribute through a competitive process. Further, the President and Chief Executive Officer is authorized (a) to execute and deliver any required agreements or documents on behalf of AHA; (b) make such reasonable or appropriate changes, additions, corrections, or amendments to such agreements or documents as she may deem necessary or appropriate, or as may be required by HUD or as a result of changes in applicable law; and (c) negotiate and carry out the actions set forth therein, all without the further vote or approval of this Board.

Exhibit EO - 1 - A

FY 2010 CATALYST

Executive Summary[1]

No.	Supporting Activity Name	FY 2010 Summary Description	Status*	FY 2009	FY 2010
		MTW USE OF FUNDS			
MTW Use of Funds		On January 16, 2009, AHA and HUD executed a second amendment to AHA's Amended and Restated Agreement, clarifying AHA's use of its MTW funds (combined public housing operating, capital funds and voucher program funds). The second amendment reinstates AHA's ability to invest MTW Funds in real estate transactions pursuant to its "Use of MTW Funds" Implementation Protocol and reaffirms that AHA's MTW Funds may be used for MTW eligible activities as defined in the Amended and Restated Agreement and is not restricted to those uses specified in Sections 8 and 9 of the 1937 Act. As part of its FY 2010 priority activities, AHA intends to implement projects and initiatives that will use a portion of its MTW Funds for housing for low-income families, beyond the limitations of Section 8 and Section 9 of the U.S. Housing Act of 1937, as amended.	I	√	√
		REVITALIZATION PROGRAM			
Revitalization Program		During FY 2010, AHA, in partnership with excellent private sector developers, will continue transforming conventional public housing developments into economically sustainable, market competitive, mixed-use, mixed-income communities. AHA's revitalized communities incorporate a vision for: (1) communities re-integrated with surrounding neighborhoods; (2) great recreational facilities and greenspace; (3) local retail and commercial activities; and (4) high performing neighborhood schools. Six major revitalization projects are in various stages of development.	I	√	√
1	Developing Alternative & Supportive Housing Resources	During FY 2010, AHA will continue developing and implementing initiatives toward the development of alternative and supportive housing resources for income eligible families.	I	√	√
1a	*Subcategory: Permanent Designated Housing*	In partnership with private sector developers, AHA will continue to examine approaches in solving the problem of mixing seniors and young mentally disabled persons. A principal goal is to facilitate the development of housing in which the elderly and young mentally disabled can live independently. During FY 2010, AHA will continue with the development of two Permanent Designated Housing Communities.			
1b	*Subcategory: John O. Chiles Annex Supportive Housing Pilot*	In collaboration with The Integral Group, this pilot program will provide comprehensive intensive services targeted to populations with mental and developmental disabilities who struggle to retain stable housing. Through this pilot, AHA will reduce instances where individuals require emergency public services. Residents will be assisted with establishing and maintaining connections to their service providers within the community and will have the benefit of staff coordinating several services.			
1c	*Subcategory: Affordable Assisted Living Demonstration*	During FY 2010, AHA will utilize a skilled and knowledgeable procured contractor to explore strategies that create affordable assisted living opportunities for low-income seniors and persons with disabilities. These strategies will leverage resources with Medicaid Waivers or other service funding.			
2	QLI Redevelopment	AHA will relocate residents from 12 of its remaining obsolete public housing communities. After families have been relocated, AHA will demolish existing structures and conduct a competitive procurement process to engage private sector developers to develop mixed-use, mixed-income communities on the vacated sites. If AHA determines to sell all or a portion of any of the vacated sites, the sale proceeds will be used to further AHA's mission. During FY 2009 and FY 2010, AHA will develop a prioritization schedule for all the QLI-targeted communities and will determine the guiding principles, programmatic and return on investment criteria for redevelopment to be incorporated in request for proposals to developers.	I	√	√
3	Re-Occupancy Process	During FY 2010, AHA will continue conducting the re-occupancy relocation of households returning to revitalized communities. AHA will improve the functionality and reporting of the Consolidated Relocation Management System (CRMS) allowing REDA and Relocation staff to more accurately and effectively track re-occupancy residents.	I	√	√
4	Acquisitions	AHA has acquired a number of properties in connection with its revitalization activities (Appendix F). During FY 2010, AHA will continue acquiring improved and unimproved real estate to further advance its Revitalization Program and Business Plan activities.	I	√	√

[1]**This Executive Summary is not intended to be an all inclusive listing or description of AHA's FY 2010 MTW Plan Activities**

*__P__ - Planning Phase, __I__ - Implementation Phase

Exhibit EO - 1 - A

FY 2010 CATALYST

Executive Summary[1]

No.	Supporting Activity Name	FY 2010 Summary Description	Status*	FY 2009	FY 2010
		REVITALIZATION PROGRAM			
5	Land Swaps	In addition to property acquisitions, AHA is also negotiating land swap deals with a number of entities to further support its revitalization efforts. Land swap negotiations are underway in relation to the following communities undergoing revitalization: Capitol Homes, University Homes, Palmer and Roosevelt House, Perry Homes and Harris Homes.	I	√	√
6	Comprehensive Homeownership Program	During FY 2010, AHA will continue implementing its Comprehensive Homeownership Program which develops affordable homeownership opportunities in healthy, mixed-income communities and prepares low- to moderate- income families in becoming successful homeowners utilizing the three approaches outlined below.	I	√	√
6a	*Subcategory: HOPE VI Homeownership Down Payment Assistance*	The HOPE VI Homeownership Program provides a subordinate loan to low- and moderate- income first-time home buyers. For families that can qualify for a private mortgage, this program reduces the principal amount of the first mortgage, which then reduces their monthly housing costs. This loan assists the homeowner to bridge the difference between the affordable sales price for the proposed home and the sum of the first mortgage lien amount.			
6b	*Subcategory: Housing Choice Homeownership Mortgage Payment Assistance Program*	Since 2002, the Housing Choice Voucher Homeownership Program has provided mortgage payment assistance to 109 Housing Choice clients. The program policies, procedures and implementation are being re-engineered with new eligibility benchmark criteria established for participants, new underwriting criteria, and the establishment of a Mortgage Payment Assistance Review Committee. AHA is also carefully modifying some of the policies to raise its standards and minimize any potential for foreclosure. Implementation of the re-structured program will be fully launched during the 4th quarter of FY 2009 and will continue into FY 2010.			
6c	*Subcategory: Homeownership Self-Sufficiency*	During FY 2008, AHA began re-engineering the former HUD Family Self-Sufficiency (FSS) Program developing a new, simplified FSS Program. This program is now referred to as Homeownership Self-Sufficiency (HSS) and is a component of AHA's Comprehensive Homeownership Program. The HSS program provides comprehensive support and case management for 19 families in the areas of financial literacy and employment counseling to help them achieve their final goal of homeownership.			
		QUALITY OF LIFE INITIATIVE			
Quality of Life Initiative		The Quality of Life Initiative (QLI) allows families in 12 of AHA's conventional public housing developments the opportunity to relocate from these distressed and obsolete communities. Phase II relocations, involving approximately 2,300 households in seven communities will be completed by June 30, 2010.	I	√	√
1	Human Development and Support Services	During FY 2010, AHA will continue connecting families to Human Development and Support Services during the QLI relocation process. Human development and support services will be provided to affected families for a 27-month period which will begin prior to families being relocated.	I	√	√
2	Client Education Seminars	Preceding the start of relocation activities, AHA provided a variety of educational seminars to families, which included training for success in the Housing Choice Voucher Program; tips and tools on ensuring a successful move; adjusting to a new environment; and utility seminars to educate families on conservation and managing their budgets. During FY 2009 and FY 2010, AHA will continue offering client seminars and the *"Empowering Your S.E.L.F. for Success"* training during pre- and post-relocation.	I	√	√
3	Responsible Relocation	The Relocation Team will continue providing families with the tools to make informed choices about the best housing opportunities for their family. Such opportunities include transfers to remaining AHA high-rise communities (for seniors and disabled residents); moving to private rental communities with a limited percentage of Section 8 project based rental assistance; and utilization of tenant based vouchers in the location of their choice.	I	√	√

[1]**This Executive Summary is not intended to be an all inclusive listing or description of AHA's FY 2010 MTW Plan Activities**

Exhibit EO - 1 - A

FY 2010 CATALYST

Executive Summary[1]

No.	Supporting Activity Name	FY 2010 Summary Description	Status*	FY 2009	FY 2010
		PROJECT BASED RENTAL ASSISTANCE AS A DEVELOPMENT TOOL			
Project Based Rental Assistance as a Development Tool		AHA will continue to use Project Based Rental Assistance with the goals of (a) facilitating housing opportunities for families in healthy mixed-income communities; (b) facilitating the development of housing for the elderly; (c) facilitating the development of supportive services housing for disabled persons and other transitional housing; and (d) expanding housing opportunities in areas of low poverty.	I	√	√
1	Project Based Rental Assistance Inside of Mixed-Income Communities	Through a competitive process, AHA will solicit private developers and owners interested in reserving a percentage of their multi-family rental units for at least ten years through AHA's PBRA program. AHA has over 3,500 multi-family units either committed or under PBRA Agreements with private owners to provide housing for families, seniors and persons with special needs. AHA will continue to use this strategy to expand the availability of quality affordable housing in healthy, mixed-income communities.	I	√	√
2	Project Based Rental Assistance Regional Expansion Program	In its continued efforts to increase the quality and choice of affordable housing, AHA will negotiate Intergovernmental Agreements with various PHAs or local governments in the Atlanta metropolitan area subject to the provisions of State law to permit site-based administration of AHA's Project Based Rental Assistance Program in those jurisdictions.	I	√	√
3	Project Based Rental Assistance Homeless Demonstration Program	In support of the Mayor's Regional Homeless Commission master plan to eliminate homelessness in the city of Atlanta, AHA has established a Homeless Demonstration Program in collaboration with United Way of Metropolitan Atlanta, Inc. AHA utilizes a percentage of PBRA targeted to the chronically homeless population. Under this demonstration, AHA will solicit proposals from owners for PBRA who can ensure the delivery of supportive services to the homeless residing in their properties. These services have to be provided by a United Way- approved service provider.	I	√	√
4	Project Based Rental Assistance Mental Health Demonstration	AHA will continue soliciting proposals from developers / owners of multifamily developments that provide housing to persons with mental health disabilities who can provide evidence of a supportive services agreement with a United Way-approved service provider.	I	√	√
		RE-ENGINEERING THE HOUSING CHOICE VOUCHER PROGRAM			
Re-engineering Housing Choice Operations		As part of its operational re-engineering, Housing Choice has realigned its core functional work activity in four primary areas: (1) Participant Services; (2) Landlord Services; (3) Housing Assistance Payments Contracting; and (4) Financial and Business Operations. By utilizing this approach Housing Choice will foster a more customer-centric focus in service delivery units and improve cross functional collaboration both within Housing Choice and other AHA departments.	I	√	√
1	Housing Choice Supporting Projects - Participant Services	Starting in FY 2009 and FY 2010, Housing Choice Operations will make a decisive shift to a *customer-focused* tenant voucher program by streamlining and enhancing its service delivery to applicants and participants. The Participant Services group will administer the full life cycle of functions including participant relationship management; waitlist administration and processing; intake and eligibility screening; voucher generation and briefing; management of program moves, portability transactions, annual recertification, referral to human services development; and, participant compliance, hearings and terminations. During FY 2010, to successfully execute enhancements to these core functions, Housing Choice Operations will place particular emphasis on Policy Changes, Participant Relationship Management, Rent Simplification, Staff Capacity and Technology Solutions.	I	√	√
1a	*Subcategory: Policy Changes*	Housing Choice Operations will continue to develop, refine and institute policy and procedural using its MTW flexibility in order to address local challenges and barriers to the effective delivery of housing assistance in the Atlanta market.			
1b	*Subcategory: Participant Relationship Management*	Housing Choice Operations will implement strategies to further develop its relationships with participants in order to facilitate self-sufficiency, improve service delivery and ensure their success in mixed-income neighborhoods. Such strategies will include educational sessions, enhanced communications and improved phone and walk-in customer service. Housing Choice and other AHA departmental staff will also continue to be trained and briefed in support of this effort.			

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Exhibit EO - 1 - A

FY 2010 CATALYST

Executive Summary[1]

No.	Supporting Activity Name	FY 2010 Summary Description	Status*	FY 2009	FY 2010
		RE-ENGINEERING THE HOUSING CHOICE VOUCHER PROGRAM			
1c	*Subcategory: Rent Simplification*	Housing Choice Operations will implement new higher standard deductions. This will facilitate operational efficiency, improved customer service, accountability and greater relationship management.			
1d	*Subcategory: Staff Capacity*	Housing Choice will enhance and further develop its staff so that work responsibilities align with staff core competencies, communication with internal and external customers is consistent and well informed, and interactions with its customers and clients are more responsive and timely.			
1e	*Subcategory: Technology Solutions*	Integral to Housing Choice Operations' re-engineering is the enhancement to its information technology infrastructure. During FY 2009 and FY 2010, Housing Choice Operations will continue its Phase I business system conversion from the DDI (Data Directions Inc.) system to Oracle E-Business Suite. This conversion will allow the consolidation of a number of localized databases and programs to one comprehensive relational system. Phase II, the conversion to the Oracle E-Business Suite is also slated to begin the latter part of FY 2010.			
2	Housing Choice Supporting Projects - Landlord Services	Housing Choice Operations is expanding the scope and breadth of its landlord services function as AHA intends to move to a private sector business model. This model values enhancing relations with prospective and current owners / landlords who interface with the tenant based voucher program. The landlord services group will be responsible for landlord relationship management; housing marketing and outreach; landlord briefings and certification; landlord communications; landlord portal; and handling landlord phone calls, walk-ins, emails and correspondence.	I	√	√
2a	*Subcategory: Landlord Relationship Management*	To further build upon its relationship with quality property owners and landlords participating in the tenant-based voucher program, AHA will continue enhancing its processes and procedures, and where appropriate develop policies, to effectively manage its landlord pool. This will include the creation of relationship managers within the Landlord Services Group so that landlords have a primary point of contact on matters pertaining to their participation in the Housing Choice Program.			
2b	*Subcategory: Technology Solutions*	During FY 2010, AHA will explore consolidation of its Property Owner Application and Request for Tenancy Approval documents into a single Housing Choice Rental Application form for electronic completion and submission via AHA's Landlord Portal and will establish a state-of-the-art system for listing available housing opportunities.			
2c	*Subcategory: Leasing Incentive Fee*	During FY 2010, AHA will provide assistance to relocating participants to cover fees associated with leasing a housing unit (e.g. application fees and security deposits). AHA established the Leasing Incentive Fee as an incentive to landlords to lease quality units in healthy neighborhoods to Housing Choice participants.			
2d	*Subcategory: Housing Marketing*	AHA will develop and implement an aggressive housing marketing plan to recruit quality units in low poverty areas into AHA's Tenant Based Housing Choice Program during FY 2010. This approach is consistent with AHA's deconcentration strategy as set forth in AHA's Statement of Policies Governing the Housing Choice Tenant-Based Program included in this Plan submission.			
3	Housing Choice Supporting Projects - Housing Assistance Payments Contracting	The Housing Assistance Payments (HAP) Contracting group will be responsible for the complete life cycle of services necessary to execute a HAP contract with an eligible landlord including receiving property owner / landlord applications, landlord and unit eligibility, requests for tenancy approval processing, QLI / relocation interface, rent determinations and adjustments, HAP contract development and administration, landlord re-certifications and landlord terminations.	I	√	√
3a	*Subcategory: Operational Enhancements*	During FY 2010, the HAP Contracting group will focus on making core business process improvements and procedural changes that create a seamless HAP contracting process. This will include conducting a requirements gathering process to look at all major components in their current state and based on the desired future state understand, refine and institute Housing Choice and other departmental requirements. This effort is intended to improve internal controls to promote a seamless system for HAP Contracting processing.			
3b	*Subcategory: Inspections*	Components of AHA's Enhanced Real Estate Inspection systems include: inspections for single family, duplex, triplex and quadraplex units that include pre-contract assessments; initial inspections for property inclusion in the HC program; annual property and unit inspections; special inspections as initiated by participant, landlord or neighbors related to health and safety issues; and Quality Control inspections used to re-inspect properties that have passed or failed previous inspections. During FY 2010, this group will continue enhancing its inspection standards and processes to improve the delivery of quality affordable housing to Housing Choice participants.			

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Exhibit EO - 1 - A

FY 2010 CATALYST

Executive Summary[1]

No.	Supporting Activity Name	FY 2010 Summary Description	Status*	FY 2009	FY 2010
		RE-ENGINEERING THE HOUSING CHOICE VOUCHER PROGRAM			
3c	*Subcategory: Technology Solutions*	Core to the operational enhancements of the HAP Contracting group is the requirement to develop or improve its IT solutions. AHA will make investments to improve its landlord/vendor, inspections and pre-HAP contract system modules to correspond to any procedural or process improvements that will occur during FY 2010.			
4	Housing Choice Supporting Projects - Financial and Business Operations	The transformation of the Housing Choice business model is incomplete without the creation of supporting and enabling infrastructure. This component also relates to the community building aspect of the Housing Choice Program with local stakeholders, politicians and other metropolitan area housing authorities. Work under this area will include port administration, conducting AHA4YOU community meetings, establishing a Housing Choice Community Advisory Group and continuing to manage Housing Choice's Financial Management group and Customer Service Contact Center.	I	√	√
		ASSET MANAGEMENT			
Asset Management		AHA will continue to develop and evolve the systems, processes and procedures and human resources to create its comprehensive and integrated asset management capacity, with an emphasis on technology-oriented solutions. Asset Management will also continue managing all aspects of the on-going business relationships with Owner Entities in AHA-sponsored mixed-income communities and private sector developers and owners through the execution of PBRA Agreements; policy development and advisement; compliance monitoring and fee-based contract administration services; and, oversight of program evaluations to include the MTW Benchmark Study.	I	√	√
1	Project Based Rental Assistance Site Based Administration	During FY 2008, Project Based Rental Assistance (PBRA) transitioned from Housing Choice Operations to the Real Estate Development and Acquisitions Group and Asset Management Group as a strategic move to implement PBRA as a development tool to facilitate the creation of additional mixed-income communities. In FY 2010, AHA will continue enhancing its PBRA site based administration through the development of technology-based solutions and strengthened service delivery strategies with United Way for its PBRA Demonstration Programs.	I	√	√
2	Private Sector Innovation	AHA will work with the Owner Entities of AHA-sponsored mixed-income multifamily rental apartment communities to use innovative approaches to achieve goals and objectives at these properties. The aim is to organize AHA's asset management activities relating to the mixed-income communities and the PBRA communities into a unified approach that will focus on items such as subsidy considerations, leasing and occupancy reporting, financial reporting, site-based waiting list management, policy-related matters and compliance and oversight guidance. During FY 2010, AHA will work with these Owner Entities to develop a policy document to promote private sector innovation in these communities.	I	√	√
3	Sustaining Mixed-Income Investments	During FY 2008, AHA developed a strategy to convert the public housing operating subsidy at AHA-sponsored mixed-finance, mixed-income communities to PBRA in order to sustain and preserve investments in low income housing in these communities. Substituting Section 9 subsidy with Section 8 subsidy as a property begins to age, allows the Owner Entity to raise new capital from private funding sources to be re-invested in the community to ensure its continued viability and market competitiveness. AHA will also continue working with HUD to obtain approval of its substitution of Section 9 Subsidy with Section 8 Subsidy in AHA-Sponsored Mixed-Income Communities Protocol for further implementation of this strategy.	I	√	√
4	Innovative Subsidy Strategies for AHA's Affordable Communities Providing Housing for Seniors and Residents with Disabilities	Similar to the Mixed-Income Investments strategy above, this supporting activity provides innovative strategies for changing the Section 9 subsidy arrangement at AHA Affordable communities that provide housing for seniors and persons with disabilities. The opportunity for such Affordable communities to achieve long-term viability can only be realized by either removing (through disposition) or restructuring the Section 9 ACCs (Annual Contributions Contract) governing the group of communities that AHA will retain for a longer period in its real estate-owned portfolio that provide housing for seniors and residents with disabilities and two small family communities. During FY 2010, AHA will continue working with HUD to obtain approval of its substitution of Section 9 subsidy with Section 8 subsidy in AHA-Owned Affordable Communities Protocol for further implementation of this strategy.	I	√	√

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Exhibit EO - 1 - A

FY 2010 CATALYST

Executive Summary[1]

No.	Supporting Activity Name	FY 2010 Summary Description	Status*	FY 2009	FY 2010
		ASSET MANAGEMENT			
5	Streamlining Property-Level Operations	The central focus of this initiative is to streamline operating procedures at the property level by examining the various regulatory requirements that are attached to financing and funding development activities and looking for ways to reduce duplication of effort and obsolete systems in meeting requirements in reporting back to HUD and other funding and equity sources. While meeting its due diligence requirements and fulfilling its fiduciary responsibilities, AHA will use a combination of oversight functions internal and external to the organization that will implement compliance procedures sensitive to the various funding sources during FY 2010.	I	√	√
6	Fee-Based Contract Administration	AHA is a founding member of Georgia HAP Administrators, Inc. (GA HAP), an eleven-agency consortium organized to provide project-based administration services to HUD. AHA earns unrestricted administrative and incentive fees as a subcontractor to GA HAP for conducting management and occupancy reviews. During FY 2010, AHA will continue to conduct management and occupancy reviews for over 7,400 units located in the City of Atlanta and Fulton County. Additionally, a portion of revenues earned in excess of expenses as a GA HAP subcontractor will continue to be allocated for AHA community and corporate stewardship activities and self-sufficiency programs.	I	√	√
7	Enhanced Accessibility Initiative	AHA is committed to making its facilities and programs accessible to persons with disabilities. AHA's commitment is reflected in its Accessibility Policies included in its Statement of Corporate Policies Governing the Leasing and Residency of Assisted Apartments and pursuant to a Voluntary Compliance Agreement (VCA) with HUD, which is a four-year Agreement effective March 15, 2007. During FY 2010, AHA will fund accessibility improvements at AHA-sponsored mixed-income communities.	I	√	√
8	Rent Simplification	During FY 2008, a policy was established permitting AHA to develop standard deductions for determining adjusted annual incomes in order to calculate the client's contribution toward rent. The goals of rent simplification were established to reduce the administrative burden associated with the verification process associated with other deductions, improve operating efficiencies, reduce errors and prevent fraud relating to the failure of assisted households to report accurately their expenses for other deductions. During FY 2010, AHA will continue the implementation of its rent simplification strategy. Additionally, AHA will enter into Intergovernmental Agreements with metro-Atlanta local housing authorities to establish business relationships around portability, work / program participation requirement of clients, PBRA, subsidy billing and other matters. AHA will also work to incorporate the rent simplification methodology inside of these Agreements.	I	√	√
9	Corporate Policies Governing Eligibility, Occupancy and Program Administration	Two policy documents govern Eligibility, Occupancy and Administration of Public Housing-Assisted Units and Housing Choice Voucher Programs.	I	√	√
9a	*Subcategory: Statement of Corporate Policies Governing the Leasing and Residency of Assisted Apartments (Statement of Corporate Policies)*	The Board of Commissioners last adopted Revision Four of AHA's Statement of Corporate Policies or SCP on April 30, 2008 after conducting a properly advertised and noticed public hearing held on April 15, 2008. This revision was included in AHA's submission of its FY 2009 MTW Annual Plan (CATALYST Implementation Plan) to HUD on May 7, 2008. The SCP was updated to clarify established policies and revise existing language, as appropriate, to ensure consistency in rent and occupancy policies governing the public housing and Housing Choice Voucher programs. No substantive changes were made to the SCP since the adoption of Revision 4.			
9b	*Subcategory: Statement of Policies Governing the Housing Choice Tenant-Based Program (Statement of Housing Choice Policies)*	The Board of Commissioners adopted Revision Six of the Statement of Housing Choice Policies on April 30, 2008, along with the SCP above after conducting a public hearing on April 15, 2008. Similar to the SCP above, the Statement of Housing Choice Policies was updated to clarify established policies and revise existing language to ensure consistency between this document and the SCP. Additionally, policy language was included with respect to reasonable accommodations which afford persons with disabilities full participation in the Housing Choice Voucher program and related AHA activities, and added policy language related to the development of special programs.			

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Exhibit EO - 1 - A

FY 2010 CATALYST

Executive Summary[1]

No.	Supporting Activity Name	FY 2010 Summary Description	Status*	FY 2009	FY 2010
		ASSET MANAGEMENT			
9c	*Subcategory: MTW Benchmarking Study*	During FY 2005, AHA engaged Dr. Thomas D. Boston of EuQuant to conduct an independent, longitudinal study of AHA's MTW Program. AHA's goals under MTW is to facilitate access to better housing opportunities, better neighborhoods and great economic self-sufficiency for assisted families and the study measures to the extent to which AHA has achieved these goals. The study will also provide meaningful analysis of family demographic data required by HUD. So far, Dr. Boston has provided the FY 2006 Baseline Report that was included in AHA's FY 2006 MTW Annual Report and the FY 2008 Interim Report included in AHA's FY 2008 MTW Annual Report. This Annual Plan submission includes Dr. Boston's summary update report highlighting what will be forthcoming in the FY 2010 Benchmarking Report.			
		HUMAN DEVELOPMENT			
Human Development		AHA will continue to facilitate and provide linkages for AHA-assisted families to professional human development and support services providers with goals of (a) economically independent families; (b) educated children; and (c) self-sufficient elderly and persons with disabilities.	I	√	√
1	Work/Program Participation Requirement	AHA will continue its work policy which requires that (a) one adult (age 18-61, excluding elderly and disabled persons) in the household to work full-time at least 30 hours per week and (b) all other non-elderly, non-disabled adults in the household to be either work or program compliant.	I	√	√
2	Human Development & Support Services	During FY 2010, AHA will continue connecting families to Human Development and Support Services to support families being relocated as part of the Quality of Life Initiative (QLI). Human development and support services will be provided to affected families for a 27-month period which will begin prior to families being relocated.	I	√	√
3	Service Provider Network	The Service Provider Network (SPN) is a focused group of established Atlanta-based service providers that are committed to serving as a resource for AHA-assisted families' connection to employment, training, educational and other mainstream opportunities. During FY 2010, AHA will continue managing the relationship with the SPN and expand its base, which is now at 46 providers.	I	√	√
4	Connections to Service Provider Network (SPN)	During FY 2010, AHA will continue to implement and refine its referral system that connects AHA-assisted families with the services provided through the Service Provider Network (SPN). Furthermore, AHA will continue using its Human Services providers and Client Services Counselors to facilitate clients' connection to mainstream resources.	I	√	√
5	CATALYST Resource Guide	AHA will continue to publish and distribute the CATALYST Resource Guide which provides a listing of a variety of committed community-based organizations with resources and connections to educational services, disability services, employment and training, homeownership counseling services, childcare, mental health services, and senior supportive services. As AHA's assisted households move into broader, mainstream communities, the guide will be updated to reflect resources in those areas where families relocate.	I	√	√
6	Good Neighbor Program II	AHA's Good Neighbor Program (GNP) is an instructional program established by AHA and provided by Georgia State University, to provide guidance to AHA-assisted families on values, roles and responsibilities associated with in being a good neighbor. During FY 2010, the program will expand its coursework to include a certification requirement for participants. Classes for certification will be classified under three "real life" issues: (1) conflict resolution and problem solving; (2) community expectations – "It takes a Village"; and, (3) valuing life-long education.	I	√	√
7	Customer and Community Relations Center	AHA will continue to operate and maintain its Customer and Community Relations Center including access to a dedicated phone line (1-888-AHA-4YOU) for the community to voice neighborhood and/or client compliments or concerns to AHA. During FY 2010, AHA will increase its Customer and Community Relations Center staff to be responsive to the increased number of AHA-assisted clients relocating into the community.	I	√	√

[1]**This Executive Summary is not intended to be an all inclusive listing or description of AHA's FY 2010 MTW Plan Activities**

Exhibit EO - 1 - A

FY 2010 CATALYST

Executive Summary[1]

No.	Supporting Activity Name	FY 2010 Summary Description	Status*	FY 2009	FY 2010
		HUMAN DEVELOPMENT			
8	Rapid Response Assistance Team	During FY 2008, AHA established a Rapid Response Assistance Team to assist expeditiously Housing Choice participants impacted by property owner foreclosures. The Team offers a continuum of support leading to the resettlement of impacted families into a new living environment. There has been an increased need for similar services for families impacted by other emergency situations such as natural disasters or property abatement. Therefore, during FY 2010, the team will work with Housing Choice staff and inspectors to enhance the "emergency move" referral process and procedures.	I	√	√
9	Atlanta Community Scholars Awards (ACSA)	AHA will continue to offer the Atlanta Community Scholars Awards (ACSA) to eligible AHA residents during FY 2010. ACSA provides post secondary scholarships to eligible AHA youth to attend the college, university or technical school of their choice. AHA has partnered with the United Negro College Fund (UNCF), which provides fiscal oversight for grants and gifts received for ACSA and scholarship disbursements to awardees. The funding for the scholarships are underwritten by AHA, its employees and other community donors who support AHA youth in achieving their educational goals.	I	√	√
10	Place-Based Supportive Services Strategy Pilot	AHA in collaboration with a number of partners will continue the implementation of a place-based pilot referred to as the NORC (Naturally Occurring Retirement Community) at three of its high-rise communities. The NORC is a national program model that focuses on equipping adults to age in place and building the capacity of the community to support them in that process.	I	√	√
		REAL ESTATE MANAGEMENT			
Real Estate Management		AHA will continue to operate its longer-term hold Affordable Communities with a focus on: (1) Health, safety and viability of the communities; (2) Building Improvements and modernization; (3) Implementation of CATALYST Initiatives in property operations.	I	√	√
1	4 to 1 Elderly Admissions Policy	This admissions policy allows the PMCOs to admit 4 elderly (62 and older) or almost elderly (55-61) residents on the waiting list before admitting a young disabled resident until such time as an optimal mix of elderly/almost elderly and young disabled residents is reached for the community.	I	√	√
2	Work/Program Participation Requirement	AHA will continue its work requirement policy generally requiring that at least one non-disabled, non-elderly adult in the household receiving a subsidy from AHA under Section 9 or Section 8 work full-time at least 30 hours per week, and that all other non-disabled, non-elderly adults be in a training program or school or any combination of the two.	I	√	√
3	Enhanced Real Estate Inspection Systems	AHA will continue to refine and improve the quality assurance (QA) inspections process for AHA-owned communities. Through its integrated inspections system, AHA will continue to inspect units at each of its AHA-owned communities, at least once per year.	I	√	√
4	Enhanced Accessibility Initiative	AHA is committed to making its facilities and programs accessible to persons with disabilities. During FY 2010, AHA will continue to make accessibility improvements, to include reasonable accommodations for persons with disabilities in its longer-term hold AHA-owned communities.	I	√	√
5	Utility Allowance Waiver	During FY 2009, AHA completed an examination of the materiality of excess utility revenue, the associated administrative costs for maintaining a system for charging excess utilities, and the impact of excess utility charges on the total tenant payment given the increase to the average rent. In an effort to increase operations efficiency and to reduce the burden of utility expenses on residents living at properties with obsolete systems and infrastructures, AHA has determined that it will discontinue the billing of excess utilities beginning FY 2010.	I	√	√
6	Energy Performance Contracting	In light of the dynamic impact of AHA's revitalization program and Quality of Life Initiative on the ongoing operations of AHA-owned public housing assisted properties, AHA will consider establishing and managing its own energy performance program. This program may include, but will not be limited to, prepayment of the existing equipment lease, modification or buy-out of the contract with the ESCO, self-financing and implementing additional improvements at AHA's longer-term hold communities. During the last half of FY 2008, AHA received an energy audit from a third party contractor conduct that identified potential energy cost saving measures at AHA's longer-term hold properties that AHA will consider implementing in FY 2010 or future years.	I	√	√

[1]This Executive Summary is not intended to be an all inclusive listing or description of AHA's FY 2010 MTW Plan Activities

Exhibit EO - 1 - A

FY 2010 CATALYST

Executive Summary[1]

No.	Supporting Activity Name	FY 2010 Summary Description	Status*	FY 2009	FY 2010
		CORPORATE SUPPORT			
1	Comprehensive Integrated Agency-wide Reporting System	As AHA continues to improve its IT, financial, procurement, data and business system infrastructure, AHA will assess its current systems and business processes to ensure they align with current and future business operations and needs. AHA will also focus on creating a comprehensive, integrated and relational database enabling AHA to use data as intelligence to inform and improve its business decisions. This initiative will require both human and financial resources beginning in FY 2009 and into 2010. AHA expects that, when completed, this initiative will yield significant returns over time including greater operational efficiency, effectiveness and cost savings.	P		√
2	Local Asset Management Program	Beginning FY 2009 and continuing into 2010, AHA will refine its project based accounting and management system by designing and implementing a new Cost Allocation Plan to enhance its ability to capture and report all costs associated with the operation of the cost objectives identified in its cost allocation approach. The Cost Allocation Plan was designed to meet the requirements of the Amended and Restated Agreement, as amended, and the requirements of the revised OMB Circular A-87 (Cost Principles for State, Local and Indian Tribal Governments), and to provide improved financial reporting for each cost objective.	I	√	√
		ARRA FUNDS			
ARRA FUNDS		The American Recovery and Reinvestment Act of 2009 (ARRA) legislation released the award of $2.985 billion Capital Fund formula grant to local housing authorities across the country. AHA will receive approximately $26.5 million of the formula funds which will be used for QLI demolition activities ($8 million) and rehabilitation of AHA-owned 13 longer-term hold properties ($16.5 million). HUD will also make available $1 billion in ARRA Capital Funds through a separate competitive announcement. AHA intends to apply for a portion of the competitive ARRA funds to support development activities at several of the AHA-owned developments undergoing revitalization; acquisitions in support of revitalization; redevelopment of other AHA-owned buildings or properties; and for additional rehabilitation of longer-term hold AHA-owned properties not addressed with the ARRA capital formula funds.	P	√	√

[1]**This Executive Summary is not intended to be an all inclusive listing or description of AHA's FY 2010 MTW Plan Activities**

***P** - Planning Phase, **I** - Implementation Phase

SECRETARY'S CERTIFICATE

I, RENÉE LEWIS GLOVER, 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 (i) submit its Fiscal Year 2010 Moving To Work Annual Implementation Plan to the United States Department of Housing and Urban Development (HUD) and to implement the projects, activities, initiatives and any policy changes described therein, and (ii) submit applications or proposals to HUD for American Recovery and Reinvestment Act of 2009 competitive grant funds, and other related matters.

3. This resolution was presented to the AHA Board of Commissioners (the "Board") at its Regular Meeting on March 30, 2009 (the "Meeting").

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

   Elder James Brown, Vice Chair
   Carol Jackson
   Aaron Watson
   Margarette Paulyne Morgan White

5. At the Meeting, the Board unanimously adopted and approved the resolution attached hereto as Exhibit 1.

IN WITNESS WHEREOF, I have hereunto set my hand and the duly adopted official seal of The Housing Authority of the City of Atlanta, Georgia this 31st day of March, 2009.

RENÉE LEWIS GLOVER,
Secretary

SEAL

THE HOUSING AUTHORITY OF THE CITY OF ATLANTA GEORGIA
CORPORATE SEAL 1938

CERTIFICATION TO U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT REGARDING THE HOUSING AUTHORITY OF THE CITY OF ATLANTA, GEORGIA'S FY2010 CATALYST IMPLEMENTATION PLAN

On behalf of The Housing Authority of the City of Atlanta, Georgia ("AHA"), and in accordance with AHA's Amended and Restated Moving to Work Agreement, effective as of November 13, 2008, as further amended by that certain Second Amendment to the Moving to Work Agreement, effective as of January 16, 2009 (the "MTW Agreement"), I hereby certify that AHA's FY2010 Catalyst Implementation Plan (the "FY2010 Annual Plan") meets the substantive information reporting requirements of the Paperwork Reduction Act for the MTW Demonstration Program and HUD Form 50900 (OMB Control Number 2577-0216).

THE HOUSING AUTHORITY OF CITY OF ATLANTA, GEORGIA

By: _____

Name: Renée Lewis Glover

Title: President & CEO

Date: April 14, 2009

OMB Control Number: 2577-0216
Expiration Date: 08/31/2011

Annual Moving to Work Plan Certifications of Compliance

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

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

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairman or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the Annual Moving to Work Plan for the PHA fiscal year beginning July 1, 2009, hereinafter referred to as "the Plan", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:

1. The PHA published a notice that a hearing would be held, that the Plan and all information relevant to the public hearing was available for public inspection for at least 30 days, that there were no less than 15 days between the public hearing and the approval of the Plan by the Board of Commissioners, and that the PHA and conducted a public hearing to discuss the Plan and invited public comment.
2. The Agency took into consideration public and resident comment before approval of the Plan by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the Annual MTW Plan;
3. The PHA will carry out the Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990.
4. The PHA will affirmatively further fair housing by examining their programs or proposed programs, identify any impediments to fair housing choice within those programs, address those impediments in a reasonable fashion in view of the resources available and work with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement and maintain records reflecting these analyses and actions.
5. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
6. The PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
7. The PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
8. The PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.
9. The PHA will comply with requirements with regard to compliance with restrictions on lobbying required by 24 CFR Part 87, together with disclosure forms if required by this Part, and with restrictions on payments to influence Federal Transactions, in accordance with the Byrd Amendment and implementing regulations at 49 CFR Part 24.
10. The PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.
11. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
12. The PHA will provide HUD or the responsible entity any documentation that the Department needs to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58.
13. With respect to public housing the PHA will comply with Davis-Bacon or HUD determined wage rate requirements under section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.

14. The PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.
15. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.
16. The PHA will comply with the policies, guidelines, and requirements of OMB Circular No. A-87 (Cost Principles for State, Local and Indian Tribal Governments) and 24 CFR Part 85 (Administrative Requirements for Grants and Cooperative Agreements to State, Local and Federally Recognized Indian Tribal Governments.).
17. The PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the Moving to Work Agreement and Statement of Authorizations and included in its Plan.
18. All attachments to the Plan have been and will continue to be available at all times and all locations that the Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the PHA in its Plan and will continue to be made available at least at the primary business office of the PHA.

The Housing Authority of the City of Atlanta, Georgia
PHA Name

GA 006
PHA Number/HA Code

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

Cecil Phillips
Name of Authorized Official

Chairman, Board of Commissioners
Title

Signature

3/31/09
Date

DISCLOSURE OF LOBBYING ACTIVITIES

Approved by OMB
0348-0046

Complete this form to disclose lobbying activities pursuant to 31 U.S.C. 1352
(See reverse for public burden disclosure.)

1. Type of Federal Action:	2. Status of Federal Action:	3. Report Type:
[a] a. contract b. grant c. cooperative agreement d. loan e. loan guarantee f. loan insurance	[n/a] a. bid/offer/application b. initial award c. post-award	[a] a. initial filing b. material change **For Material Change Only:** year _____ quarter _____ date of last report _____

4. Name and Address of Reporting Entity:	5. If Reporting Entity in No. 4 is a Subawardee, Enter Name and Address of Prime:
[x] Prime [ ] Subawardee Tier _____, *if known*: **Congressional District**, *if known*: 5th	n/a **Congressional District**, *if known*:
6. Federal Department/Agency: U.S. Department of Housing and Urban Development	**7. Federal Program Name/Description:** Moving to Work Demonstration Program CFDA Number, *if applicable*: n/a
8. Federal Action Number, *if known*:	**9. Award Amount**, *if known*: $ n/a
10. a. Name and Address of Lobbying Registrant (*if individual, last name, first name, MI*):	**b. Individuals Performing Services** (*including address if different from No. 10a*) (*last name, first name, MI*):

11. Information requested through this form is authorized by title 31 U.S.C. section 1352. This disclosure of lobbying activities is a material representation of fact upon which reliance was placed by the tier above when this transaction was made or entered into. This disclosure is required pursuant to 31 U.S.C. 1352. This information will be reported to the Congress semi-annually and will be available for public inspection. Any person who fails to file the required disclosure shall be subject to a civil penalty of not less that $10,000 and not more than $100,000 for each such failure.

Signature: _____
Print Name: Renée Lewis Glover
Title: President & Chief Executive Officer
Telephone No.: (404) 817-7463 Date: 4/14/09

Federal Use Only:

Authorized for Local Reproduction
Standard Form LLL (Rev. 7-97)

INSTRUCTIONS FOR COMPLETION OF SF-LLL, DISCLOSURE OF LOBBYING ACTIVITIES

This disclosure form shall be completed by the reporting entity, whether subawardee or prime Federal recipient, at the initiation or receipt of a covered Federal action, or a material change to a previous filing, pursuant to title 31 U.S.C. section 1352. The filing of a form is required for each payment or agreement to make payment to any lobbying entity for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with a covered Federal action. Complete all items that apply for both the initial filing and material change report. Refer to the implementing guidance published by the Office of Management and Budget for additional information.

1. Identify the type of covered Federal action for which lobbying activity is and/or has been secured to influence the outcome of a covered Federal action.

2. Identify the status of the covered Federal action.

3. Identify the appropriate classification of this report. If this is a followup report caused by a material change to the information previously reported, enter the year and quarter in which the change occurred. Enter the date of the last previously submitted report by this reporting entity for this covered Federal action.

4. Enter the full name, address, city, State and zip code of the reporting entity. Include Congressional District, if known. Check the appropriate classification of the reporting entity that designates if it is, or expects to be, a prime or subaward recipient. Identify the tier of the subawardee, e.g., the first subawardee of the prime is the 1st tier. Subawards include but are not limited to subcontracts, subgrants and contract awards under grants.

5. If the organization filing the report in item 4 checks "Subawardee," then enter the full name, address, city, State and zip code of the prime Federal recipient. Include Congressional District, if known.

6. Enter the name of the Federal agency making the award or loan commitment. Include at least one organizational level below agency name, if known. For example, Department of Transportation, United States Coast Guard.

7. Enter the Federal program name or description for the covered Federal action (item 1). If known, enter the full Catalog of Federal Domestic Assistance (CFDA) number for grants, cooperative agreements, loans, and loan commitments.

8. Enter the most appropriate Federal identifying number available for the Federal action identified in item 1 (e.g., Request for Proposal (RFP) number; Invitation for Bid (IFB) number; grant announcement number; the contract, grant, or loan award number; the application/proposal control number assigned by the Federal agency). Include prefixes, e.g., "RFP-DE-90-001."

9. For a covered Federal action where there has been an award or loan commitment by the Federal agency, enter the Federal amount of the award/loan commitment for the prime entity identified in item 4 or 5.

10. (a) Enter the full name, address, city, State and zip code of the lobbying registrant under the Lobbying Disclosure Act of 1995 engaged by the reporting entity identified in item 4 to influence the covered Federal action.

    (b) Enter the full names of the individual(s) performing services, and include full address if different from 10 (a). Enter Last Name, First Name, and Middle Initial (MI).

11. The certifying official shall sign and date the form, print his/her name, title, and telephone number.

According to the Paperwork Reduction Act, as amended, no persons are required to respond to a collection of information unless it displays a valid OMB Control Number. The valid OMB control number for this information collection is OMB No. 0348-0046. Public reporting burden for this collection of information is estimated to average 10 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0046), Washington, DC 20503.

Certification for a Drug-Free Workplace

U.S. Department of Housing and Urban Development

Applicant Name

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

Program/Activity Receiving Federal Grant Funding

Moving To Work Demonstration Program

Acting on behalf of the above named Applicant as its Authorized Official, I make the following certifications and agreements to the Department of Housing and Urban Development (HUD) regarding the sites listed below:

I certify that the above named Applicant will or will continue to provide a drug-free workplace by:

a. Publishing a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the Applicant's workplace and specifying the actions that will be taken against employees for violation of such prohibition.

b. Establishing an on-going drug-free awareness program to inform employees ---

(1) The dangers of drug abuse in the workplace;

(2) The Applicant's policy of maintaining a drug-free workplace;

(3) Any available drug counseling, rehabilitation, and employee assistance programs; and

(4) The penalties that may be imposed upon employees for drug abuse violations occurring in the workplace.

c. Making it a requirement that each employee to be engaged in the performance of the grant be given a copy of the statement required by paragraph a.;

d. Notifying the employee in the statement required by paragraph a. that, as a condition of employment under the grant, the employee will ---

(1) Abide by the terms of the statement; and

(2) Notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction;

e. Notifying the agency in writing, within ten calendar days after receiving notice under subparagraph d.(2) from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to every grant officer or other designee on whose grant activity the convicted employee was working, unless the Federalagency has designated a central point for the receipt of such notices. Notice shall include the identification number(s) of each affected grant;

f. Taking one of the following actions, within 30 calendar days of receiving notice under subparagraph d.(2), with respect to any employee who is so convicted ---

(1) Taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or

(2) Requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a Federal, State, or local health, law enforcement, or other appropriate agency;

g. Making a good faith effort to continue to maintain a drug-free workplace through implementation of paragraphs a. thru f.

2. Sites for Work Performance. The Applicant shall list (on separate pages) the site(s) for the performance of work done in connection with the HUD funding of the program/activity shown above: Place of Performance shall include the street address, city, county, State, and zip code. Identify each sheet with the Applicant name and address and the program/activity receiving grant funding.)

See Attachment

Check here ☐ if there are workplaces on file that are not identified on the attached sheets.

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

Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

Name of Authorized Official	Title
Renée Lewis Glover	President & Chief Executive Officer
Signature	**Date**
X	4/14/09

form **HUD-50070** (3/98)
ref. Handbooks 7417.1, 7475.13, 7485.1 & .3

Appendix: B Certifications

Item 2. Certification for a Drug-Free Workplace Attachment

The Housing Authority of the City of Atlanta, Georgia ("AHA")

Sites for Work Performance

AHA Longer-Term Hold Communities

No.	Community	Street Address	City	State	Zip Code
1	Barge Road	2440 Barge Road	Atlanta,	Georgia	30331
2	Cheshire Bridge Road	2170 Cheshire Bridge Road	Atlanta,	Georgia	30324
3	Cosby Spear Towers	355 North Avenue	Atlanta,	Georgia	30308
4	East Lake Towers	380 East Lake Boulevard	Atlanta,	Georgia	30317
5	Georgia Avenue	174 Georgia Avenue	Atlanta,	Georgia	30312
6	Hightower Manor	2610 M.L. King Drive	Atlanta,	Georgia	30311
7	Juniper & 10th	150 Tenth Street	Atlanta,	Georgia	30309
8	Marian Road	760 Sidney Marcus Boulevard	Atlanta,	Georgia	30324
9	Marietta Road	2295 Marietta Road	Atlanta,	Georgia	30318
10	Peachtree Road	2240 Peachtree Road	Atlanta,	Georgia	30309
11	Piedmont Road	3601 Piedmont Road, NE	Atlanta,	Georgia	30305
12	Martin Street Plaza	600 Martin Street, SE	Atlanta,	Georgia	30312
13	Westminster	1422 Piedmont Avenue	Atlanta,	Georgia	30309

Appendix: B Certifications

Item 2. Certification for a Drug-Free Workplace Attachment

The Housing Authority of the City of Atlanta, Georgia ("AHA")

Sites for Work Performance

QLI Impacted Communities

No.	Community	Street Address	City	State	Zip Code
1	Palmer House	430 Centennial Olympic Park Dr.	Atlanta,	Georgia	30313
2	Roosevelt House	582 Centennial Olympic Park Dr.	Atlanta,	Georgia	30313
3	Bankhead Courts	3400 Maynard Court	Atlanta,	Georgia	30331
4	Bowen Apartments	2804 Yates Drive	Atlanta,	Georgia	30318
5	Englewood Manor	1271 Gault Street, SE	Atlanta,	Georgia	30315
6	Herndon Homes	448 Gray Street, NW	Atlanta,	Georgia	30318
7	Hollywood Courts	2515 Hollywood Court	Atlanta,	Georgia	30318
8	Jonesboro North	2291 Jonesboro Road	Atlanta,	Georgia	30315
9	Jonesboro South	2471 Jonesboro Road	Atlanta,	Georgia	30315
10	Leila Valley[1]	2413 Leila Lane, SE	Atlanta,	Georgia	30315
11	Thomasville Heights	1038 Henry Thomas Drive, SE	Atlanta,	Georgia	30315
12	U-Rescue Villa	355 North Avenue, NE	Atlanta,	Georgia	30308

[1] ***Leila Valley was removed from the Public Information Center (PIC).***

Appendix: B Certifications

Item 2. Certification for a Drug-Free Workplace Attachment

The Housing Authority of the City of Atlanta, Georgia ("AHA")

Sites for Work Performance

Communities Undergoing Revitalization

Former Property Names	New Revitalized Properties
GRADY HOMES Antoine Graves Antoine Graves Annex University Homes	**Auburn Pointe**
CARVER HOMES	**The Villages at Carver**
CAPITOL HOMES	**Capitol Gateway**
HARRIS HOMES John O. Chiles John O. Chiles Annex	**Collegetown at West End**
MCDANIEL GLENN McDaniel Glenn Annexes Martin Luther King Jr. Tower	**Mechanicsville**
PERRY HOMES	**West Highlands at Heman E. Perry Boulevard**

These communities are in an active redevelopment process, which includes one or more of the following phases:

- ■ Master Planning
- ■ Resident Relocation
- ■ Demolition
- ■ Disposition
- ■ Construction
- ■ Lease-Up

Appendix B: Certifications

Item 2. Certification for a Drug-Free Workplace Attachment

The Housing Authority of the City of Atlanta, Georgia ("AHA")

Sites for Work Performance

Buildings Included in Revitalization Projects that Remain Undemolished

Revitalization Projects
Antoine Graves
Graves Annex
Martin Luther King Tower
University Homes

Properties Acquired to Facilitate Revitalization

Candidate Properties for Demolition and/or Disposition[1] AHA Facilities and / or Land	
Facilities Maintenance Shop	749 McDaniel Street[2]
Harland Discovery Teen Center	433 Peeples Street, S.W., Atlanta, Georgia 30310
North Avenue Warehouse	301 North Avenue [2]
Perry Homes Park	Land Swap
Gilbert Gardens Annex	Land Parcel I.D. Number: 0014-0033-0001-0107-4

[1]The reference to demolition or disposition includes the complete or partial demolition or disposition of the property.

[2] Represents properties that have received demolition approval from HUD.
North Avenue Warehouse has been demolished.

Acquisitions / Land Swaps

Harris Homes Revitalization

The properties below were acquired by AHA through a land swap with College Partners, Inc. (CPI) and subsequent condemnations as part of the revitalization of Harris Homes. These properties are also candidates for demolition and/or disposition or will be used to expand AHA's real estate portfolio, provide affordable and/or mixed-income, mixed-use housing opportunities, and support local revitalization initiatives to stabilize local neighborhoods.

Parcel I.D.	Property Address
14-0117-0002-021-5	299 Abbott Street
14-0117-0002-022-3	303 Abbott Street
14-0117-0002-023-1	307 Abbott Street
14-0117-0002-024-9	311 Abbott Street
14-0117-0003-055-2	316 Abbott Street
14-0117-0003-017-2	320 Abbott Street
14-0116-0010-085-1	279-281 Ashby Street
14-0116-0010-086-9	285 Ashby Street
14-0116-0010-119-8	295–299 Ashby Street
14-0117-0003-013	333 Ashby Street
14-0117-0002-029-8	Baldwin Place
14-0117-0002-045-4	Baldwin Street
14-0117-0002-046-2	Baldwin Street
14-0117-0002-030-6	291 Baldwin Street
14-0117-0002-031-4	297 Baldwin Street
14-0117-0002-032-2	303 Baldwin Street

- Condemned Lots
Part of Lot B14 was acquired from CPI at closing and part was acquired by condemnation

Harris Homes Revitalization-continued

Parcel I.D.	Property Address
14-0117-0002-028-0	304 Baldwin Place
14-0117-0002-033-0	309 Baldwin Place
14-0117-0002-035-5	315 Baldwin Place
14-0117-0002-027-2	1007 Baldwin Street
14-0117-0002-026	1003 Baldwin Street
14-0117-0002-025-6	993 Baldwin Street
14-0117-0002-036	1027 Baldwin Street
14-0117-0002-037-1	1031 Baldwin Street
14-0117-0002-038-9	1037 Baldwin Street
14-0117-0002-039-7	1041 Baldwin Street
14-0117-0002-040-5	1047 Baldwin Street
14-0117-0002-095-9	1059 Baldwin Street
14-0116-0010-083-6	Frank Street
14-0116-0010-084-4	928-930 Frank Street
14-0116-0010-082-8	936 Frank Street
14-0116-0010-080-2	944 Frank Street
14-0116-0010-079-4	948 Frank Street
14-0116-0010-078-6	952 Frank Street
14-0116-0010-077-8	954 Frank Street
14-0116-0010-076-0	960 Frank Street
14-0116-0010-075-2	964 Frank Street
14-0116-0010-074-5	968 Frank Street
14-0116-0010-109-9	980 Frank Street
14-0117-0003-054-5	325 Joseph E. Lowery Blvd.
14-0116-0010-027-3	Westview Drive
14-0116-0010-093-5	Westview Drive
14-0117-0002-003-3	Westview Drive
14-0117-0003-008-1	Westview Drive
14-0117-0002-017-3	Westview Drive
14-0117-0002-014-0	Westview Drive
14-0117-0003-010-7	926 Westview Drive
14-0117-0003-009-9	930 Westview Drive
14-0116-0010-089-3	931 Westview Drive

- Condemned Lots

Part of Lot B14 was acquired from CPI at closing
and part was acquired by condemnation

Harris Homes Revitalization-continued

Parcel I.D.	Property Address
14-0116-0010-090-1	935 Westview Drive
14-0117-0003-007-3	938 Westview Drive
14-0116-0010-091-9	939 Westview Drive
14-0117-0003-064-4	940-42 Westview Dr.
14-0116-0010-092-7	943 Westview Drive
14-0117-0003-004-0	944-946 Westview Drive
14-0117-0003-003-2	948 Westview Drive
14-0116-0010-094-3	949 Westview Drive
14-0117-0003-002-4	952 Westview Drive
14-0116-0010-095-0	953 Westview Drive
14-0116-0010-096-8	957 Westview Drive
14-0116-0010-108-1	961 Westview Drive
14-0116-0010-099-2	967 Westview Drive
14-0116-0010-100-8	975 Westview Drive
14-0117-0002-101-5	978 Westview Drive
14-0116-0010-030-7	981 Westview Drive
14-0117-0002-099-1	984 Westview Drive
14-0116-0010-029-9	985 Westview Drive
14-0117-0002-100-7	990 Westview Drive
14-0116-0010-028-1	993 Westview Drive
14-0117-0002-019-9	994 Westview Drive
14-0117-0002-018-1	998 Westview Drive
14-0117-0002-016-5	1006 Westview Drive
14-0117-0002-015-7	1012 Westview Drive
14-0117-0002-013-2	1018 Westview Drive
14-0117-0002-012-4	1020 Westview Drive
14-0117-0002-011-6	1022 Westview Drive
14-0117-0002-010-8	1026 Westview Drive
14-0117-0002-009-0	1030 Westview Drive
14-0117-0002-008-2	1032 Westview Drive
14-0117-0002-007-4	1036 Westview Drive
14-0117-0002-006-6	1040 Westview Drive
14-0117-0002-005-8	1044 Westview Drive
14-0117-0002-004-1	1052-1054 Westview Drive
14-0117-0002-002-5	1056 Westview Drive
14-0117-0002-001-7	1060 Westview Drive

- Condemned Lots

Part of Lot B14 was acquired from CPI at closing and part was acquired by condemnation

Harris Homes Revitalization-continued

The properties below are *additional sites* that AHA has acquired as part of the revitalization of Harris Homes. These properties are also candidates for demolition and/or disposition.

Parcel I.D.	Property Address
14-0117-LL-0010	406 Lawton Street
14-0116-0010-058-8	931 Frank Street
14-0116-0010-059-6	937 Frank Street
14-0116-0010-081-0	940 Frank Street
14-0116-0010-060-4	941 Frank Street
14-0116-0010-061-2	945 Frank Street

Magnolia Park Revitalization

The properties listed below were acquired as part of the Magnolia Park revitalization and are candidates for demolition and/or disposition:

Parcel I.D.	Property Address
14-0110-0004-034-3	875 Booker Washington Drive NW
14-0110-0007-007-6	880 Booker Washington Drive
14-0110-0004-036-8	883 Booker Washington Drive NW
14-0110-0007-004-3	890/892 Booker Washington Drive
14-0110-0009-017-3	Carter Street NW
14-0110-0009-018-1	767 Carter Street NW
14-0110-0009-021-5	81 James P Brawley Drive
14-0110-0009-022-3	87 James P Brawley Drive
14-0110-0009-023-1	91 James P Brawley Drive
14-0110-0009-024-9	93 James P Brawley Drive
14-0110-0009-025-6	95 James P Brawley Drive
14-0110-0009-158-5	111 James P Brawley Drive NW
14-0110-0007-006-8	886 Magnolia Street
14-0110-0007-056-3	892 Magnolia Street NW
14-0110-0005-089-6	791 Spencer Street NW
14-0110-0005-021-9	797 Spencer Street NW
14-0110-0005-022-7	801 Spencer Street NW
14-0110-0004-059-0	835 Spencer Street
14-0110-0004-060-8	843 Spencer Street NW
14-0110-0004-048-3	847 Spencer Street NW
14-0110-0004-056-6	855 Spencer Street NW

Magnolia Park Revitalization - continued

Parcel I.D.	Property Address
14-0110-0004-057-4	859 Spencer Street NW
14-0110-0004-015-2	883 Spencer Street NW
14-0110-0004-016-0	887 Spencer Street NW
14-0110-0005-006-0	804 Thurmond Street NW
14-0110-0004-053-3	834 Thurmond Street
14-0110-0004-054-1	838 Thurmond Street NW
14-0110-0004-061-6	846 Thurmond Street NW
14-0110-0004-064-0	842 Thurmond Street NW
14-0010-0004-062-4	850 Thurmond Street NW

Carver Homes Revitalization

The properties listed below were acquired as part of the Carver Homes revitalization and are candidates for demolition and/or disposition:

Parcel I.D.	Property Address
14-0072-0002-031-7	Pryor Road SW
14-0073-LL-008-7	1463 South Pryor Road SW
14-0072-0002-007-7	1569 Pryor Road SW
14-0072-0002-008-5	1599 Pryor Road SW
14-0072-0002-012-7	1623 Pryor Road SW

University Homes Revitalization

The properties listed below were acquired as part of the University Homes revitalization and are candidates for demolition and/or disposition:

Parcel I.D.	Property Address
14-0084-0005-041-9	605-607 Fair Street
14-0084-0005-043-5	615 Fair Street
14-0109-0005-083-2	649 Fair Street
14-0109-0005-082-4	651 Fair Street
14-0109-0005-041	653 Fair Street
14-0084-0005-073-3	655 Fair Street
14-0084-0005-090-6	136 Vine Street
14-0084-0005-091-4	138 Vine Street
14-0084-0005-051-8	140 Vine Street

University Homes Revitalization - continued

Parcel I.D.	Property Address
14-0084-0005-050-0	146 Vine Street
14-0084-0005-049-2	152 Vine Street
14-0084-0005-048-4	158 Vine Street
14-0109-0005-047	162 Vine Street
14-0084-0005-046-8	168 Vine Street
14-0084-0005-044-3	172 Vine Street
14-0084-0005-034-4	175 Walnut Street

Grady Homes Revitalization

The properties below are *additional sites* that AHA has acquired as part of the revitalization of Grady Homes. These properties are also candidates for demolition and/or disposition.

Parcel I.D.	Property Address
14-0045-0006-037-4	380 Decatur Street
14-0046-0010-204-3	15 Hilliard Street
14-0045-0001-059-3	6 Hilliard Street
14-0045-0001-058-5	20 Hilliard Street
14-0045-0001-029-6	William Homes Borders Sr. Drive*

***To be acquired 1st Quarter FY 2010**

Techwood/Clark Howell Homes Revitalization

These properties below are sites that AHA continues to own and control as part of the revitalization of Techwood/Clark Howell Homes. These properties are also candidates for demolition and/or disposition.

Parcel I.D.	Property Address
Centennial Place Community Center	526 Merritts Avenue, Atlanta, GA
The Coupla Building	480 Centennial Olympic Park Drive, Atlanta, GA

AHA Sponsored Mixed-Income, Mixed-Finance Communities:

No.	Community	Street Address	City	State	Zip Code
1	Veranda at Auburn Pointe**	115 Hilliard Street	Atlanta,	Georgia	30312
2	Ashley CollegeTown at West End	387 Joseph E. Lowery Boulevard, SW	Atlanta,	Georgia	30310
3	Ashley Courts at Cascade I	1371 Kimberly Way	Atlanta,	Georgia	30331
4	Ashley Courts at Cascade II	1371 Kimberly Way	Atlanta,	Georgia	30331
5	Ashley Courts at Cascade III	1371 Kimberly Way	Atlanta,	Georgia	30331
6	Ashley Terrace at West End	717 Lee Street	Atlanta,	Georgia	30310
7	Capitol Gateway I**	89 Woodward Avenue	Atlanta,	Georgia	30312
8	Capitol Gateway II	89 Woodward Avenue	Atlanta,	Georgia	30312
9	Centennial Place I	526 Centennial Olympic Park Drive	Atlanta,	Georgia	30313
10	Centennial Place II	526 Centennial Olympic Park Drive	Atlanta,	Georgia	30313
11	Centennial Place III	526 Centennial Olympic Park Drive	Atlanta,	Georgia	30313
12	Centennial Place IV	526 Centennial Olympic Park Drive	Atlanta,	Georgia	30313
13	Veranda at CollegeTown**	372 Legacy Drive	Atlanta,	Georgia	30310
14	Columbia Commons**	2524 Martin Luther King, Jr. Drive	Atlanta,	Georgia	30311
15	Columbia Creste at West Highlands	1903 Drew Drive	Atlanta,	Georgia	30318
16	Columbia Estates at West Highlands	1710 Noel Street	Atlanta,	Georgia	30318
17	Columbia Grove at West Highlands	1783 Johnson Road	Atlanta,	Georgia	30318
18	Columbia Mechanicsville**	500 McDaniel Street	Atlanta,	Georgia	30312
19	Columbia Mechanicsville Senior**	555 McDaniel Street	Atlanta,	Georgia	30312
20	Columbia Mechanicsville Crossing**	541 Fulton Street	Atlanta,	Georgia	30312
21	Columbia Mechanicsville Station**	540 Humphries Street	Atlanta,	Georgia	30312
22	Columbia Village[1]	100 Jessica Avenue	Atlanta,	Georgia	30032
23	Magnolia Park I	60 Paschal Boulevard	Atlanta,	Georgia	30314
24	Magnolia Park II	60 Paschal Boulevard	Atlanta,	Georgia	30314

AHA Sponsored Mixed-Income, Mixed-Finance Communities (continued):

No.	Community	Street Address	City	State	Zip Code
25	Columbia Park Citi at West Highlands	921 West Moreland Circle	Atlanta,	Georgia	30318
26	The Village at Castleberry Hill I	600 Greensferry Avenue	Atlanta,	Georgia	30314
27	The Village at Castleberry Hill II	600 Greensferry Avenue	Atlanta,	Georgia	30314
28	The Villages at Carver I	174 Moury Avenue	Atlanta,	Georgia	30315
29	The Villages at Carver II	174 Moury Avenue	Atlanta,	Georgia	30315
30	The Villages at Carver III	174 Moury Avenue	Atlanta,	Georgia	30315
31	The Villages at Carver V	174 Moury Avenue	Atlanta,	Georgia	30315
32	Villages of East Lake I	460 East Lake Boulevard	Atlanta,	Georgia	30317
33	Villages of East Lake II	460 East Lake Boulevard	Atlanta,	Georgia	30317
34	Veranda at Carver**	217 Thirkeld Avenue	Atlanta,	Georgia	30314
35	Atrium at CollegeTown**	387 Joseph E. Lowery Boulevard	Atlanta,	Georgia	30310
36	The Gardens at CollegeTown	899 Park Street	Atlanta,	Georgia	30310

These properties have PBRA and Annual Contributions Contract (ACC) assisted units.

[1] Each AHA sponsored Mixed-Income, Mixed-Finance Community is located in Fulton County, except Columbia Village, which is located in DeKalb County.

Project-Based Rental Assistance (PBRA) Properties:

No.	Community	Street Address	City	State	Zip Code
1	Auburn Glenn	49 Boulevard, SE	Atlanta,	Georgia	30312
2	Campbell Stone Apartments Senior	2911 Pharr Court South NW	Atlanta,	Georgia	30305
3	Columbia at Sylvan Hills	1150 Astor Avenue, SW	Atlanta,	Georgia	30310
4	Columbia Colony Senior	2999 Continental Colony Parkway	Atlanta,	Georgia	30331
5	Columbia Commons**	2524 MLK Jr. Drive	Atlanta,	Georgia	30311
6	Columbia Heritage Senior	1900 Perry Boulevard	Atlanta,	Georgia	30318
7	Columbia High Point Senior	220 Bowen Circle	Atlanta,	Georgia	30315
8	Columbia Senior at Blackshear	14 Meldon Avenue	Atlanta,	Georgia	30315
9	Columbia Senior Residences at Edgewood	1281 Caroline Street	Atlanta,	Georgia	30307
10	Columbia Senior Residences at MLK	350 Main Street	Atlanta,	Georgia	30312
11	Columbia Tower at MLK Village	125 Logan Street	Atlanta,	Georgia	30312
12	Constitution Avenue Apartments	960 Constitution Avenue	Atlanta,	Georgia	30315
13	Crogman School	1093 West Avenue	Atlanta,	Georgia	30312
14	Gateway at Northside Village	370 Northside Drive	Atlanta,	Georgia	30318
15	Gladstone Apartments	545 Burroughs Street – B	Atlanta,	Georgia	30315
16	Hampton Oaks	1955 Ladawn Lane	Atlanta,	Georgia	30318
17	Heritage Green	2891 Springdale Road	Atlanta,	Georgia	30315
18	Heritage Station I (Multi-family)	765 McDaniel Street	Atlanta,	Georgia	30310
19	Heritage Station II (Senior)	765 McDaniel Street	Atlanta,	Georgia	30310
20	The Park at Scott's Crossing	1620 Hollywood Road	Atlanta,	Georgia	30318
21	Pavilion Place	532 Cleveland Avenue	Atlanta,	Georgia	30315
22	The Peaks at MLK	2423 M.L.K., Jr. Drive	Atlanta,	Georgia	30311
23	The Renaissance at Park Place South	240 Amal Drive	Atlanta,	Georgia	30315
24	Highbury Terraces	40 Mount Zion Road	Atlanta,	Georgia	30354
25	GE Towers	490 Glenn Street	Atlanta,	Georgia	30312
26	Veranda at Carver**	217 Thirkeld Avenue	Atlanta,	Georgia	30314
27	Veranda at CollegeTown	372 Legacy Drive	Atlanta,	Georgia	30310
28	Villas Apartments	2905 Third Avenue	Atlanta,	Georgia	30315
29	Woods at Glenrose	50 Mount Zion Road	Atlanta,	Georgia	30354
30	Atrium at CollegeTown**	387 Joseph E. Lowery Blvd	Atlanta,	Georgia	30310
31	Avalon Park Family	2798 Peek Road	Atlanta,	Georgia	30318
32	Avalon Park Senior	2748 Donald Lee Hollowell Pkwy	Atlanta,	Georgia	30318
33	Avalon Ridge	183 Mt. Zion Road	Atlanta,	Georgia	30312
34	Capitol Gateway**	89 Woodward Avenue	Atlanta,	Georgia	30312

These properties have PBRA and Annual Contributions Contract (ACC) assisted units.

Project-Based Rental Assistance (PBRA) Properties –continued:

No.	Community	Street Address	City	State	Zip Code
35	Columbia Mechanicsville**	500 McDaniel Street	Atlanta,	Georgia	30312
36	Columbia Mechanicsville Senior**	555 McDaniel Street	Atlanta,	Georgia	30312
37	First Step	1250 Donnelly Avenue	Atlanta,	Georgia	30310
38	Park Commons HFOP	200 Peyton Road	Atlanta,	Georgia	30311
39	Park Commons HFS	150 Peyton Road	Atlanta,	Georgia	30311
40	Seven Courts	2800 MLK Jr. Drive	Atlanta,	Georgia	30311
41	Veranda at Auburn Pointe**	372 Legacy Drive	Atlanta,	Georgia	30310
42	Adamsville Green[1]	3537 MLK Drive	Atlanta,	Georgia	30331
43	Arcadia at Parkway Village[1]	South Fulton Parkway,	Atlanta,	Georgia	30213
44	Ashton Browns Mill[1]	500 Cleveland Avenue	Atlanta,	Georgia	30354
45	Columbia Mechanicsville Crossing[1]**	505 Fulton Street	Atlanta,	Georgia	30312
46	Columbia Mechanicsville Station[1]**	512 Fulton Street	Atlanta,	Georgia	30312
47	Legacy at Walton Lakes[1]	4725 Walton Crossing,	Atlanta,	Georgia	30331
48	Welcome House[1]	234 Memorial Drive, SW	Atlanta,	Georgia	30303
49	Woodbridge at Parkway Village[1]	Southwood and Thompson Road	Fairburn	Georgia	30213

*****These properties have PBRA and Annual Contributions Contract (ACC) assisted units.***
[1]As of April 10, 2009, these PBRA properties are under construction.

AHA Corporate Office:

The Housing Authority of the City of Atlanta, Georgia
230 John Wesley Dobbs Avenue, NE
Atlanta, Georgia 30303

Additional AHA Facilities:

The Housing Authority of the City of Atlanta, Georgia
Central Warehouse
301 North Ave
Atlanta, Georgia 30365

The Housing Authority of the City of Atlanta, Georgia
Facilities Maintenance Shop
749 McDaniel Street
Atlanta, Georgia 30310

Certification for a Drug-Free Workplace AHA Listing

Additional AHA Facilities (continued):

The Housing Authority of the City of Atlanta, Georgia
Facilities Maintenance Shop
568 Humphries Street
Atlanta, Georgia 30312

Fulton Street/McDaniel Glenn Vacant Property

John Hope Model Building Vacant Property

Gilbert Gardens Annex Vacant Property

Appendix C: AHA Conventional Public Housing Communities

Communities Undergoing Revitalization*	QLI Impacted Communities**	High-Rise Communities	Family Communities
Antoine Graves ♦	Bankhead Courts	Barge Road	Martin Street Plaza
Antoine Graves Annex ♦	Bowen Apartments	Cheshire Bridge	Westminster
Capitol Homes	Englewood Manor ♦♦	Cosby Spear Towers	
Carver Homes	Herndon Homes	East Lake Towers	
Grady Homes	Hollywood Courts	Georgia Avenue	
Harris Homes	Jonesboro North ♦♦	Hightower Manor	
John O. Chiles ♦	Jonesboro South ♦♦	Juniper & 10th	
John O. Chiles Annex	Leila Valley ♦♦	Marian Road	
McDaniel Glenn	Thomasville Heights	Marietta Road	
M.L. King Tower ♦	U-Rescue Villa ♦♦	Peachtree Road	
Perry Homes	Palmer House	Piedmont Road	
University Apartments	Roosevelt House		

Legend

***These communities are in an active redevelopment process, which includes one or more of the following phases:**

Master Planning	Disposition
Resident Relocation	Construction
Demolition	Lease-Up

♦: **Senior High Rise Communities**

** By July 1, 2009, these communities will receive demolition approval from HUD and are in one or more of the following phases:

Resident Relocation
Active Demolition
Demolition Complete

♦♦: These properties should be removed from Public Information Center (PIC) by June 30, 2009. *Leila Valley was removed from PIC as of March 2009.*

Appendix D: AHA Mixed-Income Communities

Mixed-Use, Mixed-Income Communities
Under Various Stages of Development

Veranda at Auburn Pointe

Ashley CollegeTown at West End

Ashley Courts at Cascade I

Ashley Courts at Cascade II

Ashley Courts at Cascade III

Ashley Terrace at West End

Capitol Gateway I

Capitol Gateway II

Centennial Place I

Centennial Place II

Centennial Place III

Centennial Place IV

Veranda at CollegeTown

Columbia Commons

Columbia Creste at West Highlands

Columbia Estates at West Highlands

Columbia Grove at West Highlands

Columbia Mechanicsville

Columbia Mechanicsville Senior

Columbia Mechanicsville Crossing

Columbia Mechanicsville Station

Columbia Village

Magnolia Park I

Magnolia Park II

Columbia Park Citi at West Highlands

The Village at Castleberry Hill I

The Village at Castleberry Hill II

The Villages at Carver I

The Villages at Carver II

The Villages at Carver III

The Villages at Carver V

Villages of East Lake I

Villages of East Lake II

Veranda at Carver

Atrium at CollegeTown

The Gardens at CollegeTown

Appendix E: HUD Project Numbers for AHA Properties and Communities

HUD Project Numbers for AHA Properties and Communities
AHA Owned Communities

HUD Project Numbers	Family Communities	Status Update
GA006028	Bankhead Courts	Relocation Stage; Will be vacant FY 2010
GA006012	Bowen Apartments	Relocation Stage; Will be vacant FY 2010
GA006023	Englewood Manor	QLI; Demolished*
GA006005R2	Herndon Homes	Relocation Stage; Will be vacant FY 2010
GA006020	Hollywood Courts	Relocation Stage; Will be vacant FY 2010
GA006032	Jonesboro North	QLI; Demolished*
GA006031	Jonesboro South	QLI; Demolished*
GA006029	Leila Valley	QLI; Demolished* *(Removed from PIC)*
GA006056	Martin Street Plaza	
GA006017	Thomasville Heights	Relocation Stage; Will be vacant FY 2010
GA006010	University Apartments	HOPE VI Redevelopment; Demolition Ongoing
GA006024	U-Rescue Villa	QLI; Demolished*
GA006044	Westminster	

HUD Project Number	Elderly/Disabled Communities	Status Update
GA006011	Antoine Graves	HOPE VI Redevelopment; Vacant
GA006054	Barge Road	
GA006047	Cheshire Bridge	
GA006024	Cosby Spear Towers	
GA006030	East Lake Towers	
GA006025	Georgia Avenue	
GA006026	Antoine Graves Annex	HOPE VI Redevelopment; Vacant
GA006053	Hightower Manor	
GA006043	Juniper & 10th	
GA006052	Marian Road	
GA006058	Marietta Road	
GA006016	M.L. King Tower	HOPE VI Redevelopment; Vacant
GA006014	Palmer House	
GA006045	Peachtree Road	
GA006048	Piedmont Road	
GA006027	Roosevelt House	Will begin Relocation in FY 2009

By April 2009, these properties should be completely demolished and removed from the Public Information Center (PIC).

Appendix E: HUD Project Numbers for AHA Properties and Communities

AHA-Sponsored Mixed-Income Communities[1]

HUD Project Number	Mixed-Income Communities
GA006093	Ashley CollegeTown
GA006083	Ashley Courts at Cascade I
GA006087	Ashley Courts at Cascade II
GA006090	Ashley Courts at Cascade III
GA006084	Ashley Terrace at West End
GA06P006104	Veranda at Auburn Pointe
GA006097	Capitol Gateway I
GA006099	Capitol Gateway II
GA006077A	Centennial Place I
GA006077B	Centennial Place II
GA006077C	Centennial Place III
GA006077D	Centennial Place IV
GA006100	Columbia at Mechanicsville Apartments
GA006101	Columbia Senior Residences at Mechanicsville
GA006092	Columbia Commons
GA006081	Columbia Village
GA006082	Magnolia Park I
GA006086	Magnolia Park II
GA006080	The Village at Castleberry Hill I
GA006061	The Village at Castleberry Hill II
GA006085	The Villages at Carver I
GA006091	The Villages at Carver II
GA006088	The Villages at Carver III
GA006102	The Villages at Carver V
GA006065	Villages of East Lake I
GA006078	Villages of East Lake II
GA006089	Columbia Estates at West Highlands
GA006096	Columbia Grove at West Highlands
GA006094	Columbia Park Citi at West Highlands
GA006095	Columbia Creste at West Highlands
GA06P006103	Atrium at CollegeTown
GA06P006107	The Gardens at CollegeTown
GA06P006105	Columbia Mechanicsville Crossing
GA06P006106	Columbia Mechanicsville Station

1Veranda at CollegeTown and Veranda at Carver are not included in this list. Due to the fact that they do not have public housing units, they do not get HUD Project Numbers.

Appendix E: HUD Project Numbers for AHA Properties and Communities

AHA Properties

HUD Project Number	Property	Status Update
GA006016 / GA006051	Facilities Maintenance Shop (568 Humphries Street)	Now part of a HOPE VI development
GA006060 / GA006051	Facilities Maintenance Shop (749 McDaniel Street)	Demolition Plans for FY 2010
GA006016	Fulton Street/McDaniel Glenn Vacant Property	
GA006033	Gilbert Gardens Annex	Demolished; Vacant
GA006002	John Hope Model Building	Demolished; Now a Park
GA006002	North Avenue Warehouse (301 North Avenue)	Demolished

Appendix F: Candidate Communities or Properties for Demolition, Disposition, Innovative Subsidy Strategies, Rent Restructuring and/or Other Repositioning Activities

Candidate Communities for Demolition, Disposition, Innovative Subsidy Strategies, Rent Restructuring and/or Other Repositioning Activities

QLI Impacted Communities	Longer-Term Hold Communities	Communities Undergoing Revitalization[2]
Palmer House*	Barge Road*	Antoine Graves*
Roosevelt House**	Cheshire Bridge*	Antoine Graves Annex*
Bankhead Courts**	Cosby Spear Towers*	John O. Chiles*
Bowen Apartments**	East Lake Towers*	John O. Chiles Annex*
Englewood Manor**	Georgia Avenue*	M.L. King Tower*
Herndon Homes**	Hightower Manor*	Capitol Homes**
Hollywood Courts**	Juniper & 10th*	Carver Homes**
Jonesboro North**	Marian Road*	Grady Homes**
Jonesboro South**	Marietta Road*	Harris Homes**
Leila Valley**[1]	Peachtree Road*	McDaniel Glenn**
Thomasville Heights**	Piedmont Road*	Perry Homes**
U-Rescue Villa**	Martin Street Plaza**	University Apartments**
	Westminster**	

Legend

Demolition or Disposition: includes the complete or partial demolition or disposition of the community.

***High Rise Communities:** any reference to a community includes associated non-residential structures, including community centers.

****Family Communities**: any reference to a community includes associated non-residential structures, including community centers.

[1]**Leila Valley** was removed from the Public Information Center (PIC).

[2]**Communities in the Active Redevelopment Process**: including master planning, resident relocation, demolition, disposition, construction, and lease-up.

Innovative Subsidy Strategies are described in the Asset Management section of the FY 2010 Implementation Plan.

Appendix F: Candidate Communities or Properties for Demolition, Disposition, Innovative Subsidy Strategies, Rent Restructuring and/or Other Repositioning Activities

Candidate Communities[1] for Disposition and/or Rent Restructuring

AHA- Sponsored Mixed Income Communities	
Ashley CollegeTown	Columbia Mechanicsville Station
Ashley Courts I	Columbia Park Citi
Ashley Courts II	Columbia Senior Residences at Mechanicsville
Ashley Courts III	Columbia Village
Ashley Terrace West End	The Gardens at CollegeTown (formerly John O' Chiles Annex)
Atrium at CollegeTown (formerly John O' Chiles)	Magnolia Park I
Capitol Gateway I	Magnolia Park II
Capital Gateway II	Summerdale I
Centennial Place I	Summerdale II
Centennial Place II	Veranda at Auburn Pointe
Centennial Place III	The Village at Castleberry Hill I
Centennial Place IV	The Village at Castleberry Hill II
Columbia Commons	The Villages at Carver I
Columbia Creste	The Villages at Carver II
Columbia Estates	The Villages at Carver III
Columbia Grove	The Villages at Carver V
Columbia Mechanicsville Apartments	Villages East Lake I
Columbia Mechanicsville Crossing	Villages East Lake II

[1]***Communities all have Annual Contributions Contract (ACC) units and are subject to disposition scenarios as detailed under the Sustaining Mixed-Income Investment supporting activity (please see Asset Management section of the FY 2010 Implementation Plan).***

Appendix F: Candidate Communities or Properties for Demolition, Disposition, Innovative Subsidy Strategies, Rent Restructuring and/or Other Repositioning Activities

Properties Acquired to Facilitate Revitalization

Candidate Properties for Demolition and/or Disposition[1] AHA Facilities and / or Land	
Facilities Maintenance Shop	749 McDaniel Street[2]
Harland Discovery Teen Center	433 Peeples Street, S.W., Atlanta, Georgia 30310
North Avenue Warehouse	301 North Avenue [2]
Perry Homes Park	Land Swap
Gilbert Gardens Annex	Land Parcel I.D. Number: 0014-0033-0001-0107-4

[1]The reference to demolition or disposition includes the complete or partial demolition or disposition of the property.

[2] Represents properties that have received demolition approval from HUD.

North Avenue Warehouse has been demolished.

Acquisitions / Land Swaps

Harris Homes Revitalization

The properties below were acquired by AHA through a land swap with College Partners, Inc. (CPI) and subsequent condemnations as part of the revitalization of Harris Homes. These properties are also candidates for demolition and/or disposition or will be used to expand AHA's real estate portfolio, provide affordable and/or mixed-income, mixed-use housing opportunities, and support local revitalization initiatives to stabilize local neighborhoods.

Parcel I.D.	Property Address
14-0117-0002-021-5	299 Abbott Street
14-0117-0002-022-3	303 Abbott Street
14-0117-0002-023-1	307 Abbott Street
14-0117-0002-024-9	311 Abbott Street
14-0117-0003-055-2	316 Abbott Street
14-0117-0003-017-2	320 Abbott Street
14-0116-0010-085-1	279-281 Ashby Street
14-0116-0010-086-9	285 Ashby Street
14-0116-0010-119-8	295–299 Ashby Street
14-0117-0003-013	333 Ashby Street
14-0117-0002-029-8	Baldwin Place
14-0117-0002-045-4	Baldwin Street
14-0117-0002-046-2	Baldwin Street
14-0117-0002-030-6	291 Baldwin Street
14-0117-0002-031-4	297 Baldwin Street
14-0117-0002-032-2	303 Baldwin Street

- Condemned Lots

Part of Lot B14 was acquired from CPI at closing and part was acquired by condemnation

Appendix F: Candidate Communities or Properties for Demolition, Disposition, Innovative Subsidy Strategies, Rent Restructuring and/or Other Repositioning Activities

Harris Homes Revitalization-continued

Parcel I.D.	Property Address
14-0117-0002-028-0	304 Baldwin Place
14-0117-0002-033-0	309 Baldwin Place
14-0117-0002-035-5	315 Baldwin Place
14-0117-0002-027-2	1007 Baldwin Street
14-0117-0002-026	1003 Baldwin Street
14-0117-0002-025-6	993 Baldwin Street
14-0117-0002-036	1027 Baldwin Street
14-0117-0002-037-1	1031 Baldwin Street
14-0117-0002-038-9	1037 Baldwin Street
14-0117-0002-039-7	1041 Baldwin Street
14-0117-0002-040-5	1047 Baldwin Street
14-0117-0002-095-9	1059 Baldwin Street
14-0116-0010-083-6	Frank Street
14-0116-0010-084-4	928-930 Frank Street
14-0116-0010-082-8	936 Frank Street
14-0116-0010-080-2	944 Frank Street
14-0116-0010-079-4	948 Frank Street
14-0116-0010-078-6	952 Frank Street
14-0116-0010-077-8	954 Frank Street
14-0116-0010-076-0	960 Frank Street
14-0116-0010-075-2	964 Frank Street
14-0116-0010-074-5	968 Frank Street
14-0116-0010-109-9	980 Frank Street
14-0117-0003-054-5	325 Joseph E. Lowery Blvd.
14-0116-0010-027-3	Westview Drive
14-0116-0010-093-5	Westview Drive
14-0117-0002-003-3	Westview Drive
14-0117-0003-008-1	Westview Drive
14-0117-0002-017-3	Westview Drive
14-0117-0002-014-0	Westview Drive
14-0117-0003-010-7	926 Westview Drive
14-0117-0003-009-9	930 Westview Drive
14-0116-0010-089-3	931 Westview Drive

- Condemned Lots

Part of Lot B14 was acquired from CPI at closing and part was acquired by condemnation

Appendix F: Candidate Communities or Properties for Demolition, Disposition, Innovative Subsidy Strategies, Rent Restructuring and/or Other Repositioning Activities

Harris Homes Revitalization-continued

Parcel I.D.	Property Address
14-0116-0010-090-1	935 Westview Drive
14-0117-0003-007-3	938 Westview Drive
14-0116-0010-091-9	939 Westview Drive
14-0117-0003-064-4	940-42 Westview Dr.
14-0116-0010-092-7	943 Westview Drive
14-0117-0003-004-0	944-946 Westview Drive
14-0117-0003-003-2	948 Westview Drive
14-0116-0010-094-3	949 Westview Drive
14-0117-0003-002-4	952 Westview Drive
14-0116-0010-095-0	953 Westview Drive
14-0116-0010-096-8	957 Westview Drive
14-0116-0010-108-1	961 Westview Drive
14-0116-0010-099-2	967 Westview Drive
14-0116-0010-100-8	975 Westview Drive
14-0117-0002-101-5	978 Westview Drive
14-0116-0010-030-7	981 Westview Drive
14-0117-0002-099-1	984 Westview Drive
14-0116-0010-029-9	985 Westview Drive
14-0117-0002-100-7	990 Westview Drive
14-0116-0010-028-1	993 Westview Drive
14-0117-0002-019-9	994 Westview Drive
14-0117-0002-018-1	998 Westview Drive
14-0117-0002-016-5	1006 Westview Drive
14-0117-0002-015-7	1012 Westview Drive
14-0117-0002-013-2	1018 Westview Drive
14-0117-0002-012-4	1020 Westview Drive
14-0117-0002-011-6	1022 Westview Drive
14-0117-0002-010-8	1026 Westview Drive
14-0117-0002-009-0	1030 Westview Drive
14-0117-0002-008-2	1032 Westview Drive
14-0117-0002-007-4	1036 Westview Drive
14-0117-0002-006-6	1040 Westview Drive
14-0117-0002-005-8	1044 Westview Drive
14-0117-0002-004-1	1052-1054 Westview Drive
14-0117-0002-002-5	1056 Westview Drive
14-0117-0002-001-7	1060 Westview Drive

- Condemned Lots
Part of Lot B14 was acquired from CPI at closing and part was acquired by condemnation

Harris Homes Revitalization-continued

The properties below are *additional sites* that AHA has acquired as part of the revitalization of Harris Homes. These properties are also candidates for demolition and/or disposition.

Parcel I.D.	Property Address
14-0117-LL-0010	406 Lawton Street
14-0116-0010-058-8	931 Frank Street
14-0116-0010-059-6	937 Frank Street
14-0116-0010-081-0	940 Frank Street
14-0116-0010-060-4	941 Frank Street
14-0116-0010-061-2	945 Frank Street

Magnolia Park Revitalization

The properties listed below were acquired as part of the Magnolia Park revitalization and are candidates for demolition and/or disposition:

Parcel I.D.	Property Address
14-0110-0004-034-3	875 Booker Washington Drive NW
14-0110-0007-007-6	880 Booker Washington Drive
14-0110-0004-036-8	883 Booker Washington Drive NW
14-0110-0007-004-3	890/892 Booker Washington Drive
14-0110-0009-017-3	Carter Street NW
14-0110-0009-018-1	767 Carter Street NW
14-0110-0009-021-5	81 James P Brawley Drive
14-0110-0009-022-3	87 James P Brawley Drive
14-0110-0009-023-1	91 James P Brawley Drive
14-0110-0009-024-9	93 James P Brawley Drive
14-0110-0009-025-6	95 James P Brawley Drive
14-0110-0009-158-5	111 James P Brawley Drive NW
14-0110-0007-006-8	886 Magnolia Street
14-0110-0007-056-3	892 Magnolia Street NW
14-0110-0005-089-6	791 Spencer Street NW
14-0110-0005-021-9	797 Spencer Street NW
14-0110-0005-022-7	801 Spencer Street NW
14-0110-0004-059-0	835 Spencer Street
14-0110-0004-060-8	843 Spencer Street NW
14-0110-0004-048-3	847 Spencer Street NW
14-0110-0004-056-6	855 Spencer Street NW

Magnolia Park Revitalization - continued

Parcel I.D.	Property Address
14-0110-0004-057-4	859 Spencer Street NW
14-0110-0004-015-2	883 Spencer Street NW
14-0110-0004-016-0	887 Spencer Street NW
14-0110-0005-006-0	804 Thurmond Street NW
14-0110-0004-053-3	834 Thurmond Street
14-0110-0004-054-1	838 Thurmond Street NW
14-0110-0004-061-6	846 Thurmond Street NW
14-0110-0004-064-0	842 Thurmond Street NW
14-0010-0004-062-4	850 Thurmond Street NW

Carver Homes Revitalization

The properties listed below were acquired as part of the Carver Homes revitalization and are candidates for demolition and/or disposition:

Parcel I.D.	Property Address
14-0072-0002-031-7	Pryor Road SW
14-0073-LL-008-7	1463 South Pryor Road SW
14-0072-0002-007-7	1569 Pryor Road SW
14-0072-0002-008-5	1599 Pryor Road SW
14-0072-0002-012-7	1623 Pryor Road SW

University Homes Revitalization

The properties listed below were acquired as part of the University Homes revitalization and are candidates for demolition and/or disposition:

Parcel I.D.	Property Address
14-0084-0005-041-9	605-607 Fair Street
14-0084-0005-043-5	615 Fair Street
14-0109-0005-083-2	649 Fair Street
14-0109-0005-082-4	651 Fair Street
14-0109-0005-041	653 Fair Street
14-0084-0005-073-3	655 Fair Street
14-0084-0005-090-6	136 Vine Street
14-0084-0005-091-4	138 Vine Street
14-0084-0005-051-8	140 Vine Street

University Homes Revitalization - continued

Parcel I.D.	Property Address
14-0084-0005-050-0	146 Vine Street
14-0084-0005-049-2	152 Vine Street
14-0084-0005-048-4	158 Vine Street
14-0109-0005-047	162 Vine Street
14-0084-0005-046-8	168 Vine Street
14-0084-0005-044-3	172 Vine Street
14-0084-0005-034-4	175 Walnut Street

Grady Homes Revitalization

The properties below are *additional sites* that AHA has acquired as part of the revitalization of Grady Homes. These properties are also candidates for demolition and/or disposition.

Parcel I.D.	Property Address
14-0045-0006-037-4	380 Decatur Street
14-0046-0010-204-3	15 Hilliard Street
14-0045-0001-059-3	6 Hilliard Street
14-0045-0001-058-5	20 Hilliard Street
14-0045-0001-029-6	William Homes Borders Sr. Drive*

***To be acquired 1st Quarter FY 2010**

Techwood/Clark Howell Homes Revitalization

These properties below are sites that AHA continues to own and control as part of the revitalization of Techwood/Clark Howell Homes. These properties are also candidates for demolition and/or disposition.

Parcel I.D.	Property Address
Centennial Place Community Center	526 Merritts Avenue, Atlanta, GA
The Coupla Building	480 Centennial Olympic Park Drive, Atlanta, GA

Appendix G: AHA Candidate Communities for Permanent Percentage-Based, Elderly, Disabled, or Non-Elderly Disabled Designations

AHA Communities	
Antoine Graves*	Marian Road
Antoine Graves Annex*	Marietta Road
Barge Road	M.L. King Tower*
Cheshire Bridge	Palmer House*
Cosby Spear Towers	Peachtree Road
East Lake Towers	Piedmont Road
Georgia Avenue	Roosevelt House*
Hightower Manor	John O. Chiles*
Juniper & 10th	John O. Chiles Annex*

* These communities are in the active redevelopment process to include one or more of the following: master planning, resident relocation, demolition, disposition, construction, or lease-up.
Palmer House and Roosevelt House are not HOPE VI properties, but are a part of QLI and may not be redeveloped.

Additional Communities:
AHA and its private sector development partners will designate public housing assisted units in certain facilities to be constructed as part of AHA-sponsored community revitalizations as Elderly Only, Disabled Only, and Non-Elderly Disabled Only. These will be mixed-finance facilities where public housing operating subsidy will be used for a percentage of the units. These newly constructed facilities will be identified intermittently through the development and master planning process.

Occupancy Rates

Average Adjusted Occupancy Rate: AHA met the target average adjusted occupancy rate benchmark of 98 percent as of June 30, 2008. The occupancy rate is a combined adjusted average for AHA Affordable Communities and public housing assisted units at AHA-sponsored mixed-income communities. Table H-1 illustrates this combined average as well as the adjusted occupancy rates for each AHA-owned Affordable community as well as the public housing assisted units at each of the mixed-income communities sponsored by AHA.

NOTE: The adjusted occupancy rate takes into account the following types of units that are not included for purposes of the calculation: essential employee units, approved units kept out of occupancy for use by service providers or resident associations, units assigned to police officers, vacant units in communities that have been approved for demolition or disposition, fire damaged units which are the subject of insurance settlements, units that are part of an approved modernization project or units that are vacant due to litigation.

Issues and Proposed Actions: AHA discontinued leasing at the QLI properties once the demolition applications were submitted to HUD. During FY 2008, AHA submitted demolition applications to HUD for approval to demolish its seven remaining Quality of Life Initiative (QLI) targeted communities. These properties are Bowen Homes, Bankhead Courts, Hollywood Courts, Herndon Homes, Thomasville Heights, Palmer House and Roosevelt House. During HUD's review of these applications, AHA did not lease vacated units at these communities in accordance with HUD regulations (FR 24 CFR Part 970.25), which states that "A PHA should not re-rent these units at turnover while HUD is considering its application for demolition or disposition." The units that became vacant due to attrition must be counted as vacant until the demolition application is approved. This action impacted AHA's ability to meet or exceed this performance benchmark.

The occupancy rates fell below the ninety-eight percent benchmark for six properties (Bankhead Courts, Hollywood Courts, Herndon Homes, Thomasville Heights, Palmer House and Roosevelt

House) with demolition applications submitted but not approved by June 30, 2008. The occupancy at these six properties dropped due to attrition. These properties occupancy rates were adjusted to 100 percent in early FY 09 as soon as the demolition applications were approved. These properties adjusted occupancy will remain at 100 percent through the relocation process and until the property is vacant when AHA will stop reporting on the occupancy for each property.

Prior to June 30, 2008, the Bowen Homes demolition application was approved and Martin Luther King high-rise (MLK) was approved for demolition as part of a HOPE VI Revitalization project. As a result, the properties were reported as 100 percent occupied with all of the units at both properties either occupied or approved for demolition. As of June 30, 2008, MLK was at the tail end of relocation. The property was completely vacant by September 2, 2008.

During FY 2008 Jonesboro North, Jonesboro South, Leila Valley, U-Rescue Villa, and Englewood were vacated pursuant to approved demolition applications for these properties. University Homes, Antoine Graves and Antoine Graves Annex were all vacated in preparation for revitalization as part of HOPE VI projects. Because these properties were vacant as of June 30, 2008, AHA did not include these properties in the MTW Benchmarks Reports.

Target Average Adjusted Occupancy: AHA's occupancy rate for FY 2010 should be at or above the 98 percent benchmark. All of the demolition applications have been approved. Bowen Homes, Bankhead and Thomasville are slated to be vacated early in FY 2010. Herndon and Hollywood began relocation in January 2009 and are scheduled to be vacated by December 2009. AHA plans to begin relocation at Palmer and Roosevelt by May 2009 and relocation should be completed at these two properties by the end of FY 2010. This will complete the relocation for all QLI properties.

All Public Housing Assisted Communities are subject to market forces that affect management and leasing. There is new construction within the market niche that is drawing tenants to other properties. With respect to occupancy levels at some mixed-income community properties, each are experiencing the impact of the new development within the City. While the economic conditions

continue to create challenges, AHA's professional property management partners are making significant improvements towards meeting or exceeding Occupancy Level Benchmarks.

Appendix H: Management Information for Owned / Managed Units and Assisted Units at Mixed-Income Communities: June 30, 2008

H-1 Public Housing Assisted Communities – Occupancy Rate Levels			
Program / Community Type	Target	Percentage of Occupancy Level	Difference
High-Rise			
Barge Road	98%	100.0%	2.0%
Cheshire Bridge	98%	98.8%	0.8%
Cosby Spear Towers	98%	99.3%	1.3%
East Lake Towers	98%	100.0%	2.0%
Georgia Avenue	98%	100.0%	2.0%
Hightower Manor	98%	100.0%	2.0%
Juniper & 10th	98%	100.0%	2.0%
M.L. King Tower	98%	100.0%	2.0%
Marian Road	98%	97.9%	-0.1%
Marietta Road	98%	99.2%	1.2%
Palmer House	98%	92.0%	-6.0%
Peachtree Road	98%	100.0%	2.0%
Piedmont Road	98%	100.0%	2.0%
Roosevelt House	98%	94.1%	-3.9%
High-Rise Totals	98%	98.7%	0.7%
Family			
Bankhead Courts	98%	87.5%	-9.5%
Bowen Apartments	98%	100.0%	2.0%
Herndon Homes	98%	92.2%	-5.8%
Hollywood Courts	98%	94.0%	-4.0%
Martin St. Plaza	98%	98.3%	0.3%
Thomasville Heights	98%	93.1%	-4.9%
Westminster	98%	100.0%	2.0%
Family Totals	98%	95.0%	-3.0%
Mixed-Income			
Ashley Collegetown	98%	98%	0.0%
Ashley Courts at Cascade	98%	93%	-5.0%
Ashley Terrace at West End	98%	100%	2.0%
Centennial Place	98%	96%	-2.0%
Columbia Commons	98%	90%	-8.0%
Columbia Village	98%	100%	2.0%
Magnolia Park	98%	98%	0.0%
The Villages at Castleberry Hill	98%	98%	0.0%
The Villages at Carver	98%	94%	-4.0%
The Villages of East Lake	98%	98%	0.0%
West Highlands at Columbia Crest	98%	100%	2.0%
West Highlands at Columbia Park Citi	98%	97%	-1.0%
West Highlands at Columbia Estates	98%	100%	2.0%
West Highlands at Columbia Grove	98%	100%	2.0%
Capital Gateway (Phase III)	98%	100%	2.0%
Mixed-Income Totals	98%	97%	-1.0%
PHA TOTAL	98%	98%	0.0%

Rent Collections

Average Percentage of Uncollected Rents: AHA's average percentage of uncollected rents was two percent as of June 30, 2008. The percentages of uncollected rents for each AHA-owned community and for the public housing assisted units at each mixed-income community sponsored by AHA are set forth in Table H-2.

Issues and Proposed Actions: The collective percentage met the target percentage for this benchmark. There were a few rent collection issues for mixed-income communities. Rent Collections are a function of economic conditions. AHA's professional property managers have been working to improve the rent collection results for the properties that felt short of the benchmark goal. The property managers have been able to collect delinquent rents from many tenants. The impact has been evident since these reporting periods. Moving forward (throughout FY 2010), AHA may experience issues with uncollected rent as public units are demolished and negative economic conditions persist.

Target Projection for Percentage of Uncollected Rents: AHA anticipates the average percentage of uncollected rents will be at or below the two percent benchmark for FY 2010.

Appendix H: Management Information for Owned / Managed Units and Assisted Units at Mixed-Income Communities: June 30, 2008

H-2 Public Housing Assisted Communities Rent Collection			
Program/Community Type	Target	Percentage of Rent Uncollected	Difference
High-Rise			
Barge Road	2%	0.20%	-1.80%
Cheshire Bridge	2%	0.00%	-2.00%
Cosby Spear Towers	2%	0.10%	-1.90%
East Lake Towers	2%	0.00%	-2.00%
Georgia Avenue	2%	0.00%	-2.00%
Hightower Manor	2%	-0.10%	-2.10%
Juniper & 10th	2%	0.00%	-2.00%
M.L. King Tower	2%	0.10%	-1.90%
Marian Road	2%	0.20%	-1.80%
Marietta Road	2%	0.10%	-1.90%
Palmer House	2%	0.10%	-1.90%
Peachtree Road	2%	0.10%	-1.90%
Piedmont Road	2%	0.00%	-2.00%
Roosevelt House	2%	0.40%	-1.60%
High-Rise Totals	2%	0.10%	-1.90%
Family			
Bankhead Courts	2%	1.70%	0.30%
Bowen Apartments	2%	1.50%	-0.50%
Herndon Homes	2%	1.40%	-0.60%
Hollywood Courts	2%	1.40%	-0.60%
Martin St. Plaza	2%	0.60%	-1.40%
Thomasville Heights	2%	1.00%	-1.00%
Westminster	2%	3.40%	2.40%
Family Totals	2%	1.60%	-0.40%
Mixed-Income			
Ashley Collegetown	2%	4%	2%
Ashley Courts at Cascade	2%	4%	2%
Ashley Terrace at West End	2%	2%	0%
Centennial Place	2%	0%	-2%
Columbia Commons	2%	7%	5%
Columbia Village	2%	7%	5%
Magnolia Park	2%	7%	5%
The Villages at Castleberry Hill	2%	-2%	4%
The Villages at Carver	2%	8%	6%

H-2 Public Housing Assisted Communities Rent Collection			
Mixed-Income (cont'd)			
The Villages of East Lake	2%	3%	1%
West Highlands at Columbia Crest	2%	13%	11%
West Highlands at Columbia Park Citi	2%	9%	7%
West Highlands at Columbia Estates	2%	11%	9%
West Highlands at Columbia Grove	2%	2%	0%
Capital Gateway (Phase III)	2%	0%	-2%
Mixed-Income Totals	2%	4%	2%
PHA TOTAL	2%	2%	0%

Work Orders

Percentage of Emergency Work Orders With a Response Time of Less than 24 Hours/ Average Response Time for Routine Work Orders within 7 days: As of June 30, 2008, 99 percent of all emergency work orders received were completed or abated in less than 24 hours. Table H-3 shows the percentage of emergency work orders responded to in less than 24 hours for each AHA-owned community and for the public housing assisted units at each mixed-income community sponsored by AHA. Table H-4 reflects that non-emergency routine work orders are being addressed on average of 1.3 days as of June 30, 2008. The table also shows the average response time (in days) for routine non-emergency work orders for each community.

Issues and Proposed Actions: Through its development partners and PMCOs, AHA has remained responsive to emergency and non-emergency work order turnaround. Reduced capital improvement funding or operating subsidy may impact the ability to address maintenance issues in a proactive manner in the future. The inability to maintain a proactive maintenance posture could possibly lead to an increased number of work orders as well as more extensive repair efforts which would negatively affect AHA's response times.

During FY 2008, changes in management impacted a few communities, which affected the response times for emergency work orders. Creative Choice Homes, Inc., the managing general partner of the owner entity of Magnolia Park changed its management agent which significantly impacted that property's performance in benchmark-related areas. AHA is currently working with the principals of the managing general partner to resolve management related issues.

Target Projection of Work Orders: AHA's MTW benchmark goal is to complete or abate emergency work orders in less than 24 hours of issuance 99 percent of the time, and complete routine non-emergency work orders in less than seven days. As long as AHA continues to receive adequate funding, AHA, through the efforts of the development partners and PMCOs, expects to continue meeting the MTW benchmark for handling emergency and routine work orders during FY 2010.

H-3 Public Housing Assisted Communities Emergency Work Order Responses			
Program/Community Type	Target	% of Emergency Work Orders Completed or Abated within 24 hours	Difference
High-Rise			
Barge Road	99%	100.0%	1%
Cheshire Bridge	99%	100.0%	1%
Cosby Spear Towers	99%	100.0%	1%
East Lake Towers	99%	100.0%	1%
Georgia Avenue	99%	100.0%	1%
Hightower Manor	99%	100.0%	1%
Juniper & 10th	99%	100.0%	1%
M.L. King Tower	99%	100.0%	1%
Marian Road	99%	100.0%	1%
Marietta Road	99%	100.0%	1%
Palmer House	99%	100.0%	1%
Peachtree Road	99%	100.0%	1%
Piedmont Road	99%	100.0%	1%
Roosevelt House	99%	99.5%	0%
High-Rise Totals	99%	100.0%	1.0%
Family			
Bankhead Courts	99%	100.0%	1%
Bowen Apartments	99%	100.0%	1%
Herndon Homes	99%	100.0%	1%
Hollywood Courts	99%	100.0%	1%
Martin St. Plaza	99%	100.0%	1%
Thomasville Heights	99%	100.0%	1%
Westminster	99%	100.0%	1%
Family Totals	99%	100.0%	1.0%
Mixed-Income			
Ashley Collegetown	99%	100%	1%
Ashley Courts at Cascade	99%	99%	0%
Ashley Terrace at West End	99%	100%	1%
Centennial Place	99%	92%	-7%
Columbia Commons	99%	92%	-7%
Columbia Village	99%	98%	-1%
Magnolia Park	99%	87%	-11%
The Villages at Castleberry Hill	99%	98%	-1%
The Villages at Carver	99%	100%	1%
The Villages of East Lake	99%	100%	1%

H-3 Public Housing Assisted Communities Emergency Work Order Responses			
Mixed-Income (cont'd)			
West Highlands at Columbia Crest	99%	100%	1%
West Highlands at Columbia Park Citi	99%	94%	-5%
West Highlands at Columbia Estates	99%	100%	1%
West Highlands at Columbia Grove	99%	98%	-1%
Capital Gateway (Phase III)	99%	100%	1%
Mixed-Income Totals	99%	97%	-2%
PHA TOTAL	99%	99%	0%

Appendix H: Management Information for Owned / Managed Units and Assisted Units at Mixed-Income Communities: June 30, 2008

H-4 Public Housing Assisted Communities Routine Work Order Responses			
Program/Community Type	Target	Average Number of Days to Complete Routine Work Orders	Difference
High-Rise			
Barge Road	7	1.0	-6.0
Cheshire Bridge	7	1.0	-6.0
Cosby Spear Towers	7	1.1	-5.9
East Lake Towers	7	1.0	-6.0
Georgia Avenue	7	1.3	-5.7
Hightower Manor	7	1.5	-5.5
Juniper & 10th	7	1.2	-5.8
M.L. King Tower	7	1.0	-6.0
Marian Road	7	1.6	-5.4
Marietta Road	7	2.1	-4.9
Palmer House	7	1.1	-5.9
Peachtree Road	7	1.0	-6.0
Piedmont Road	7	1.0	-6.0
Roosevelt House	7	1.1	-5.9
High-Rise Totals	7	1.2	-5.8
Family			
Bankhead Courts	7	2.0	-5.0
Bowen Apartments	7	3.2	-3.8
Herndon Homes	7	2.5	-4.5
Hollywood Courts	7	1.0	-6.0
Martin St. Plaza	7	1.6	-5.4
Thomasville Heights	7	1.0	-6.0
Westminster	7	2.1	-4.9
Family Totals	7	1.9	-5.1
Mixed-Income			
Ashley Collegetown	7	1	-6
Ashley Courts at Cascade	7	1	-6
Ashley Terrace at West End	7	1	-6
Centennial Place	7	1	-6
Columbia Commons	7	1	-6
Columbia Village	7	1	-6
Magnolia Park	7	1	-6
The Villages at Castleberry Hill	7	1	-6
The Villages at Carver	7	1	-6
The Villages of East Lake	7	1	-6
West Highlands at Columbia Crest	7	1	-6
West Highlands at Columbia Park Citi	7	1	-6
West Highlands at Columbia Estates	7	1	-6
West Highlands at Columbia Grove	7	1	-6
Capital Gateway (Phase III)	7	1	-6
Mixed-Income Totals	7	1	-6
PHA TOTAL	7	1.3	-5.7

Inspections

Inspection Strategy: Each AHA Affordable Community and the Owner Entity Interest of the mixed-income communities through their respective property management agents are required to inspect 10 percent of the public housing assisted units at each property monthly. At year end, each site's agent is required to certify that 100 percent of all units, buildings, and common areas have been inspected and work orders have been completed to address deficiencies. As a quality control component, AHA inspects at least 1.4 percent of the units at all AHA-owned public housing assisted communities on an annual basis.

For the mixed-income communities, AHA relies on quality control inspections performed by the Georgia Department of Community Affairs (DCA) as part of their tax credit compliance oversight because in all cases, the public housing assisted units also count as tax credit units. Outcomes from the DCA inspections reports are reviewed by AHA's Management and Occupancy Compliance Department during their routine review process. This is consistent with the approach set forth by AHA in the Tax Credit Compliance Model approach approved by HUD. Table H-5 shows the percentage of units and common areas inspected as of June 30, 2008.

Issues and Proposed Actions: During FY 2008, Creative Choice Homes, Inc., the managing general partner of the owner entity of Magnolia Park changed its management agent which significantly impacted that property's performance in benchmark-related areas. AHA is currently working with the principals of all of the properties to resolve management related issues.

Target Projections for Planned Inspections: AHA anticipates completing 100 percent of its planned inspections of Section 9 units for FY 2010.

Integrated Inspection System

Beyond the required UPCS inspections for each property, in FY 2010, AHA plans to continue its enhanced integrated inspection process for AHA-owned Affordable Communities. Through its integrated inspections system, AHA's staff periodically visited communities during the course of the calendar year. The goal of the integrated inspection process is to assist the PMCOs in meeting the

goals and requirements for each property. The integrated inspection system includes the following types of inspections:

1. **Enhanced Uniform Physical Conditions Standards (UPCS) and Real Estate Assessment Center (REAC) inspection:** AHA properties were evaluated through REAC inspections as well UPCS inspections during FY 2008. The results of the UPCS and REAC inspections continue to emphasize the obsolescence of the family properties, which are being targeted under the Quality of Life Initiative. Both the REAC and UPCS inspections confirm that AHA is moving in the right direction when implementing its strategy to relocate the residents and demolish the majority of the family properties.

2. **Major System Inspections:** Every high-rise property will continue to be inspected to monitor the status of the building systems and confirm that routine preventative maintenance is performed.

3. **Asset Risk Control Inspections:** This inspection assesses the properties to ensure the adequate level of health and safety of residents. Incorporating high health and safety inspection standards has substantially decreased asset risk and has successfully lowered the insurance premiums that AHA must pay associated with apparent instances of asset dangers.

4. **Elevator Inspections:** Elevator inspections involve examining the current condition of elevators as well as evaluating performance and the level of preventative maintenance. This process ensures that elevators meet quality standards for maximized operational efficiency, which result in fewer safety risks, malfunctions, and resident complaints.

5. **Security Compliance Assessment:** Community Civility is a priority. In order to better address the crime challenges at the properties, AHA modified the scope and frequency of these inspections. The inspection focuses on the condition of community safety features including: signs of community decay, site lighting, operational condition of access control and video call down systems, maintenance of ban lists, and quality of security patrols. As with AHA's other inspections, the findings are reported to the PMCOs who quickly implement the necessary

corrective actions. Some of the challenges at the properties include keeping unregistered, illegally parked cars off the properties as well as keeping the gates, lighting and cameras operational.

6. **Rental Integrity Monitoring (RIM) Review:** This review focuses on the documentation in the resident files that pertains to the verification of income and deductible expenses and the calculation of rent. AHA's Asset Management and Policy Development Division conduct this review.

7. **Procurement and Labor Compliance Review:** The intent of this review is to evaluate the PMCO compliance with AHA's sourcing strategy and appropriate federal regulations. A team from the AHA Acquisition Management Services Department performs these reviews by checking a sample of the operational and capital improvement contract files for each PMCO. Unlike the other inspections, this review is conducted once a year for each PMCO at the PMCO corporate office. Most of the procurements are completed at the PMCO corporate level. Each PMCO uses the results of this review to improve their procedures and tighten their quality controls.

8. **Accounting Review:** Fiscal accountability is one of AHA's top priorities. Each PMCO is reviewed once a quarter with an Accounting Review Inspection at a different unannounced property each month. The review includes 11 functional areas critical to the PMCO and property accounting which are: Tenant Accounts Receivables and Tenant Ledgers, Allowance for Doubtful Accounts, Prepaid Expenses, Accounts Payable, Accrued Payroll & Payroll Related Liabilities, Prepaid Rents & Deferred Revenue, Security Deposit Liability, Petty Cash, Cash Handling, Bad Debt Write-offs & Collections, and Revenue & Expenses. These reviews help the PMCO improve their operations by identifying areas that require more focus.

H-5 Public Housing Assisted Communities Unit and Common Areas Inspection Levels			
Program/Community Type	Target	Percentage of Units and Common Areas Inspected	Difference
High-Rise			
Barge Road	100%	100.0%	0.0%
Cheshire Bridge	100%	100.0%	0.0%
Cosby Spear Towers	100%	100.0%	0.0%
East Lake Towers	100%	100.0%	0.0%
Georgia Avenue	100%	100.0%	0.0%
Hightower Manor	100%	100.0%	0.0%
Juniper & 10th	100%	100.0%	0.0%
M.L. King Tower	100%	100.0%	0.0%
Marian Road	100%	100.0%	0.0%
Marietta Road	100%	100.0%	0.0%
Palmer House	100%	100.0%	0.0%
Peachtree Road	100%	100.0%	0.0%
Piedmont Road	100%	100.0%	0.0%
Roosevelt House	100%	100.0%	0.0%
High-Rise Totals	100%	100.0%	0.0%
Family			
Bankhead Courts	100%	100.0%	0.0%
Bowen Apartments	100%	100.0%	0.0%
Herndon Homes	100%	100.0%	0.0%
Hollywood Courts	100%	100.0%	0.0%
Martin St. Plaza	100%	100.0%	0.0%
Thomasville Heights	100%	100.0%	0.0%
Westminster	100%	100.0%	0.0%
Family Totals	100%	100.0%	0.0%
Mixed-Income			
Ashley Collegetown	100%	100%	0%
Ashley Courts at Cascade	100%	100%	0%
Ashley Terrace at West End	100%	100%	0%
Centennial Place	100%	100%	0%
Columbia Commons	100%	100%	0%
Columbia Village	100%	100%	0%
Magnolia Park	100%	41%	-59%
The Villages at Castleberry Hill	100%	100%	0%
The Villages at Carver	100%	100%	0%
The Villages of East Lake	100%	100%	0%
West Highlands at Columbia Crest	100%	100%	0%

Appendix H: Management Information for Owned / Managed Units and Assisted Units at Mixed-Income Communities: June 30, 2008

H-5 Public Housing Assisted Communities Unit and Common Areas Inspection Levels			
Mixed-Income (cont'd)			
West Highlands at Columbia Park Citi	100%	100%	0%
West Highlands at Columbia Estates	100%	100%	0%
West Highlands at Columbia Grove	100%	100%	0%
Capital Gateway (Phase III)	100%	100%	0%
Mixed-Income Totals	100%	95%	-5%
PHA TOTAL	100%	98%	-2%

Security

AHA continued to address crime and safety in the communities through collaborative strategies with its private development partners, PMCOs, local law enforcement, and residents. With the down turn in the economy, crime increased across Atlanta in FY08. This increase in crime across the City significantly affected AHA properties. AHA will continue to combat this crime by:

(1) Vacating and demolishing the obsolete properties which foster crime,

(2) Dedicating over $3 million during FY 2010 to maintain the security presence of off duty police officers and security officers at the remaining properties and those in relocation,

(3) Building on its relationship with the Atlanta Police Department to identify other methods to reduce crime and enhance safety and security at AHA-owned properties and AHA-sponsored mixed-income communities,

(4) Continuing enhanced criminal screening standards and processes and strict lease enforcement, and

(5) Completing the necessary preventive maintenance and repairs to ensure security equipment remained operational.

Appendix I: Management Information for Leased Housing

Units Under Lease/Target Lease Up Rate

AHA reports unit leasing information to HUD through monthly submissions in HUD's Voucher Management System (VMS.) AHA no longer reports this information in its Plan pursuant to HUD's January 12, 2006 approval of AHA's FY 2006 CATALYST Implementation Plan, which included a revision of required submissions in AHA's MTW Annual Plans and Reports.

Calculation of Budget Utilization Rate Benchmark

Pursuant to AHA's MTW Agreement, AHA expects to meet the budget utilization rate benchmark of 98 percent for the next fiscal year. Under AHA's FY 2008 Implementation Plan, AHA included clarifying language that the 98 percent expenditure rate only applies to vouchers that are fully funded during AHA's entire fiscal year, and that any new vouchers received intermittently during the fiscal year are excluded from the 98 percent requirement until the following fiscal year until such time that a 12-month period has elapsed. AHA made this clarification in light of changes that HUD made in funding vouchers based on a calendar year versus a fiscal year.

Plans Regarding Ensuring Rent Reasonableness Expanding Housing Opportunities and Deconcentration of Low Income Families

AHA's policies for ensuring rent reasonableness, expanding housing opportunities and deconcentration of low-income families are set forth in AHA's Statement of Housing Choice Policies included in this Plan submission. Several of AHA's priorities and strategies for deconcentrating poverty are to:

- Continue its strategic revitalization initiatives in partnership with private sector development partners with the goal of creating healthy and economically sustainable, mixed-use, mixed-income communities;
- Reposition its public housing portfolio under the Quality of Life Initiative while relocating families to healthier, mixed-income communities using Housing Choice vouchers;
- Use Project Based Rental Assistance as a development tool to promote the development of quality affordable housing for families, seniors and persons with disabilities that offers substantially better housing opportunities for these populations;
- Develop its own system of payment standards inside of its Housing Choice Program enabling eligible families to choose rental housing in low poverty areas and opening up a broader area of affordable housing opportunities within AHA's jurisdiction; and
- Develop a robust rent reasonableness system current with dynamic market changes in AHA's jurisdiction.
- Develop a market approach for attracting and fostering long-term relationships with landlords, private owners, property management companies and rental housing industry groups to expand AHA's housing resource network.

Inspections

During FY 2009, AHA is continuing to refine its inspections standards and process in an effort to keep pace with the re-engineering of the Housing Choice Program in support of the transition of over 3,000 assisted families from the Public Housing Program into the Housing Choice Program as part of AHA's Quality of Life Initiative (QLI). These refinements include but are not limited to further streamlining and enhancing inspections standards to ensure quality living environments for assisted families; updating inspections systems technology; and implementing an in-house inspector certification training program. AHA also continues to conduct initial, annual and quality control inspections toward achieving its MTW benchmark goals. During FY 2010, AHA will make continuous improvements toward achieving a state-of-the-art inspections operation.

AHA's Quality of Life Initiative

What is the Quality of Life Initiative?

The Quality of Life Initiative allows families in AHA's remaining conventional public housing projects the opportunity to relocate from an environment of concentrated poverty, consistent with AHA's vision of providing eligible families with access to affordable housing, while deconcentrating poverty and building healthy communities.

Why now?

- Despite the revitalization of more than a dozen AHA communities, the privatization of property management, and implementation of organizational efficiencies, more than 2,000 AHA families still live in the economically and socially detrimental conditions of concentrated poverty.
- A negotiated agreement with HUD has given AHA a window of opportunity (July 1, 2003 – June 30, 2010) during which the agency has financial and regulatory flexibility in addressing Atlanta's affordable housing needs.
- The per-unit cost that HUD funds has dropped from 98.1% in 2005 to 76% in 2007, worsening the conditions at Atlanta's already obsolete public housing projects.

What will happen to the families?

- AHA will utilize Responsible Relocation in coordination with Atlanta Public Schools and other community stakeholders. Responsible Relocation ensures choice, support and successful outcomes for each family.

- Intensive human service case management will:
  - --- Support the families pre- and post-relocation
  - --- Promote successful transition of families to new communities
  - --- Increase self-sufficiency
  - --- Assist in achieving personal goals

- The Relocation Team will provide the families with the tools to make informed choices about the best housing opportunities:

  - AHA high-rise communities (seniors and the disabled)
  - Private mixed-income rental communities with a limited percentage of project based rental assistance
  - Housing Choice tenant based vouchers

How will this initiative impact neighborhoods?

The Relocation Team will manage the relocation of families with thoughtful consideration of the impact on Atlanta's neighborhoods, with assistance from:

--- Georgia State University to prepare families to be successful neighbors
--- Human Development and Support Services coaching and counseling services
--- 1-888-AHA-4YOU – 24-hour customer service hotline for Atlanta's citizens

Relocation Schedule (As of August 29, 2008)

Property	Affected Residents	Start Date	End Date	Status	Percentage Relocated
Phase I					
Englewood Manor	310	7/31/2007	2/29/2008	Completed	100%
Jonesboro North	98	7/31/2007	1/31/2008	Completed	100%
Jonesboro South	150	8/6/2007	1/31/2008	Completed	100%
Leila Valley	115	4/18/2007	11/30/2007	Completed	100%
U-Rescue Villa	71	7/31/2007	1/31/2008	Completed	100%
TOTAL	*744**				

Relocation Schedule (As of March 12, 2009)

Phase II					
Bowen Homes	535	7/1/2008	8/31/2009	Relocation Underway	85%
Bankhead Courts	337	8/1/2008	7/31/2009	Relocation Underway	56%
Thomasville Heights	323	8/1/2008	7/31/2009	Relocation Underway	66%
Herndon Homes	248	1/1/2009	12/31/2009	Relocation Underway	14%
Hollywood Courts	187	1/1/2009	12/31/2009	Relocation Underway	26%
Roosevelt House**	228	5/1/2009	2/28/2010	Relocation to begin May 1, 2009	N / A
Palmer House**	220	5/1/2009	2/28/2010		N / A
TOTAL	*2,153*				

*702 households relocated successfully; 42 households were either evicted, deceased, or skip moved
**Senior High-Rises

More information

- Barney Simms, *Chief External Affairs Officer*
  (404) 817-7449

Appendix K – Housing Opportunities Data

I. Housing Stock Information:

Public Housing (PH) Units* - Projected at start of FY 2010

Community Type	Family	Senior	Special Needs	Total PH units by Community Type
Affordable	2,453	2,678	-	**5,131**
Mixed-Income	2,070	169	26	**2,265**
Total PH units	**4,523**	**2,847**	**26**	

Public Housing Units Grand Total: 7,396

AHA does not have any non-MTW public housing units in its portfolio.

New Public Housing Units to be Added during FY 2010:

There are no new units scheduled to be added during FY 2010. The units currently under construction will be completed in FY 2009 (this is based on the assumption that Grady and Harris phases will not close in time to count for FY 2010).

Public Housing (PH) Units to be Removed** from Inventory by Development - Projected for FY 2010

Affordable Communities

Development / Type	PH Units Removed
Family	
Bankhead Courts	386
Bowen Homes	650
Herndon Homes	273
Hollywood Courts	202
Thomasville Heights	350
University Homes	500
Total Family Units	**2,361**
Senior / High-Rise	
Antoine Graves	210
Antoine Graves Annex	100
Total Senior / High-Rise Units	**310**

Grand Total PH Units Removed: 2,671

****These communities are part of AHA's Quality of Life Initiative (QLI) and are slated for demolition during FY 2010.***

Appendix K – Housing Opportunities Data

I. Housing Stock Information:

Housing Choice Voucher (HCV) Units Projected to be Project Based during FY 2010

Project Based Rental Assistance (PBRA) Communities

Existing Developments	Total Units
Family	
Auburn Glenn	108
Avalon Park Family	53
Capital Gateway II	16
Columbia at Sylvan Hills	37
Columbia Commons	15
Columbia Mechanicsville Apartments	35
Constitution Ave Apartments	67
Crogman Schools Apartments	42
Gateway at Northside Village	40
G E Towers	81
Hampton Oaks	50
Heritage Greene	44
Heritage Station I	88
Highbury Terraces	17
The Park at Scotts Crossing	86
The Peaks at MLK	73
Family Total	**852**

Existing Developments	Total Units
Senior / High-Rise	
Atrium at Collegetown	76
Avalon Park Senior	81
Campbell Stone	201
Columbia Colony Senior	37
Columbia Heritage Senior	124
Columbia High Point Senior	94
Columbia Senior Residences at MLK	119
Columbia Senior Residences at Mechanicsville	81
Columbia Senior Residences at Blackshear	78
Columbia Senior Residences at Edgewood	136
Heritage Station II	150
Renaissance at Park Place South	80
Veranda at Auburn Pointe	61
Veranda at Carver	56
Veranda at Collegetown	90
Senior / High-Rise Total	**1,464**

Appendix K – Housing Opportunities Data

I. Housing Stock Information:

Housing Choice Voucher (HCV) Units Projected to be Project Based during FY 2010

Project Based Rental Assistance (PBRA) Communities – *continued*

Existing Developments	Total Units
Older Persons 55+	
Park Commons HFOP	130
Park Commons HFS	110
Older Persons 55+ Total	**240**
Homeless Demonstration	
Columbia at Sylvan Hills	39
Columbia Tower at MLK Village	39
First Step	40
Park Commons HFOP	22
Park Commons HFS	19
Seven Courts	30
Homeless Demonstration Total	**189**
Special Needs	
Columbia Tower at MLK Village	56
Special Needs Total	**56**

Combined Existing Developments Grand Total: 2,801

Note: *The grand total reflects the combined number of units classified as Family; Senior; Older Persons 55; Homeless Demonstration; and Special Needs.*

I. Housing Stock Information:

Housing Choice Voucher (HCV) Units Projected to be Project Based during FY 2010

Project Based Rental Assistance (PBRA) Communities – *continued*

Developments (Under Construction)	Total Units
Family	
Avalon Ridge	89
Arcadia at Parkway Village	116
Columbia Mechanicsville Station	30
Columbia Mechanicsville Crossing	35
Family Total	**270**
Senior	
Woodbridge at Parkway Village	0
Senior Total	**0**
Older Persons 55+	
Ashton Browns Mill	79
Legacy at Walton Lakes	31
Older Persons 55+ Total	***110***
Mental Health Demo	
Welcome House	41
Mental Health Demo Total	**41**

Developments Under Construction Grand Total: 421

II. Leasing Information:

Anticipated Total Number of MTW PH Units Leased in FY 2010

Community Type	Family	Senior	Special Needs	Total MTW PH units by Community Type
Affordable	91	1,852	-	1,943
Mixed-Income	2,150	201	26	2,377
MTW PH Units Total	**2,241**	**2,053**	**26**	

MTW PH Units Grand Total: 4,320

Anticipated Total Number of MTW HCV Units Leased in FY 2010

Type	Units Total
MTW HCV units	7,371
Ports	3,010

MTW HCV Leased Units Grand Total: 10,381

Anticipated Total Number of Non-MTW HCV Units Leased in FY 2010

Type	Units Total
Family Unification Program (FUP)	300
Mainstream Vouchers	225

Non-MTW HCV Leased Units Grand Total: 525

II. Leasing Information:

Potential Issues Leasing Units:

AHA gauges its progress annually through established benchmark performance goals found in AHA's Revision of MTW Benchmarks Protocol (see ***Appendix O***). The fiscal year 2010 benchmark goals are displayed in the table below; AHA's occupancy rate target benchmark goal is greater than or equal to 98 percent. AHA suspects that the occupancy rates for leasing public housing units (HCV and / or PH) may be impacted by competing market forces (i.e. new mixed-income community developments), which may result in AHA missing its fiscal year 2010 goal.

AHA anticipates no issues relating to AHA's MTW Housing Choice Budget Utilization benchmark, which requires that the expenditure of fiscal year Housing Choice Annual Budget allocation for MTW vouchers utilized for MTW eligible activities be greater than or equal to the target benchmark of 98 percent. In its FY 2007 Implementation Plan, AHA added clarifying language for this benchmark. As part of the FY 2008 Implementation Plan, AHA has included further clarifying language that the 98 percent expenditure rate only applies to vouchers that are fully funded during AHA's entire fiscal year, and that any new vouchers received intermittently during the fiscal year are excluded from the 98 percent requirement until the following fiscal year until such time that a 12-month period has elapsed. AHA is making this clarification in light of changes that HUD has made in funding vouchers based on a calendar year versus a fiscal year.

MTW Program Benchmarks – Measurable Outcomes Table

Performance Measure	Baseline	FY 10 Goal
PUBLIC HOUSING PROGRAM (SECTION 9)		
% Rents Uncollected	2%	≤ 2%
Gross tenant rents receivable through the last day of the Fiscal Year (FY) divided by the total amount of tenant rents billed during the FY shall be less than or equal to the target benchmark.		
Occupancy Rate	98%	≥ 98%
The ratio of occupied public housing units to available units as of the last day of the FY shall be greater than or equal to the target benchmark.		
Emergency Work Orders Completed or Abated in <24 Hours	99%	≥ 99%
The percentage of emergency work orders that are completed or abated within 24 hours of issuance of the work order shall be greater than or equal to the target benchmark. (Abated is defined as "emergency resolved through temporary measure, and a work order for long-term resolution has been issued.")		
Routine Work Orders Completed in < 7 Days	5 Days	100%
The average number of days that all non-emergency work orders will be active during the FY shall be 7 days or less.		
% Planned Inspections Completed	100%	100%
The percentage of all occupied units and common areas that are inspected during the FY shall be greater than or equal to the target benchmark.		
HOUSING CHOICE PROGRAM (SECTION 8)		
Budget Utilization Rate	98%	≥ 98%
The expenditure of FY Housing Choice Annual Budget allocation for MTW vouchers utilized for MTW eligible activities will be greater than or equal to the target benchmark of 98%.		
% Planned Annual Inspections Completed	98%	≥ 98%
The percent of all units under contract that are inspected directly by AHA or any other agency responsible for monitoring the property during the fiscal year shall be greater than or equal to the target benchmark by the last day of the fiscal year.		
Quality Control Inspections	≥ 1.4%	≥ 1.4%
The percent of quality control inspections on units inspected directly by AHA during the fiscal year shall be greater than or equal to the target benchmark.		

II. Leasing Information:

MTW Program Benchmarks – Measurable Outcomes Table (continued)

Performance Measure	Baseline	FY 10 Goal
COMMUNITY AND SUPPORTIVE SERVICES		
Resident Homeownership	6	120
The number of Public Housing residents, Housing Choice Voucher participants, and other income eligible families who close on purchasing a home during the FY, regardless of participation in a homeownership counseling program, shall be greater than or equal to the target benchmark.		
Household Work/Program Compliance*	N/A	75%
The annual percentage of Public Housing and Housing Choice assisted households that are Work/Program compliant (excluding elderly and disabled members of the households) through the last day of the FY shall be greater than or equal to the target benchmark		
FINANCE		
Project Based Financing Closings	0	6
Annual number of projects in which AHA will commit project-based vouchers.		
Investment Deals Involving MTW Funds	0	1
Annual number of projects in which AHA will make an investment of MTW funds.		

Potential Changes in Waiting Lists:

AHA expects that there will be no changes in the management of its waiting lists for FY 2010.

Potential Changes in Number of Families on the Waiting Lists:

AHA conducted a purge of its waiting list in 2008, which is currently up-to-date. Therefore, AHA does not anticipate opening the waiting list during FY 2010. Due to attrition (as families move from PBRA, Affordable, and AHA sponsored Mixed-Income communities), the waiting list will be utilized to fill vacancies at each site managing PH and HCV units.

FY 2009 Comprehensive Operating and Capital Budget

Submitted to the Board of Commissioners for Approval on June 25, 2008

		MTW Funds	*Non MTW & State Funds*	*GA HAP and Other Non-HUD Funds*	*Development & Revitalization Activities*	*AHA Total*
Operating	REVENUE:					
	Housing Choice Operating Subsidy	$166,474,846	$5,510,763			$171,985,609
	Tenant Dwelling Revenue	10,094,626				10,094,626
	Low Income Operating Subsidy	27,670,634				27,670,634
	Capital Funds Program	7,827,500				7,827,500
	Development and Hope VI Grants				$7,103,045	7,103,045
	Development and Transaction Fees				1,152,000	1,152,000
	Other Revenue	129,634	43,500	$1,500,000		1,673,134
	Interest Income	716,175	18,000	53,750	1,306,200	2,094,125
	Gain on Sale of Fixed Asset				1,725,000	1,725,000
	Total Revenue:	$212,913,415	$5,572,263	$1,553,750	$11,286,245	$231,325,674
	EXPENSES:					
	Housing Assistance Payments	$115,434,811	$5,510,763			$120,945,574
	Administrative	48,096,046		$502,987	$1,120,050	49,719,083
	Fees for Service					
	Resident Services Including Relocation	15,847,469	43,500		2,534,201	18,425,169
	Utilities	8,952,064			7,788	8,959,852
	Ordinary Maintenance and Operation	12,930,628				12,930,628
	Protective Services	5,051,682				5,051,682
	General Expenses	7,189,052		36,455	692,596	7,918,103
	Extraordinary Maintenance	4,473,465				4,473,465
	Demolition Expenses	7,827,500			8,050,000	15,877,500
	Interest Expense	224,638			90,000	314,638
	Total Expenses:	$226,027,354	$5,554,263	$539,442	$12,494,635	$244,615,695
	Increase/(Decrease) in Net Assets	($13,113,939)	$18,000	$1,014,308	($1,208,389)	($13,290,021)
Capital	Capital Grant Revenue					
	Modernization	$7,177,950				$7,177,950
	Consultants and Other Fees				$70,000	70,000
	Developer Loans for Revitalization				23,750,014	23,750,014
	Homeownership Subsidy				400,000	400,000
	Site Acquisitions					
	Site Improvements for Revitalization				7,134,280	7,134,280
	Site Work for Revitalization				423,586	423,586
	Sub-total Capital Grants Revenue	$7,177,950			$31,777,880	$38,955,830
	Total Increase/ (Decrease) in Net Assets before Non-Cash	($5,935,989)	$18,000	$1,014,308	$30,569,491	$25,665,809
	Non Cash Expenditures:					
	Loss on Capital Asset Disposition	($16,963,740)				($16,963,740)
	Depreciation & Amortization Expense	(7,342,783)		($1,200)	($93,036)	(7,437,020)
	Sub-total Non Cash Expenditures	($24,306,523)		($1,200)	($93,036)	($24,400,759)
	Total Increase/(Decrease) in Net Assets	($30,242,512)	$18,000	$1,013,108	$30,476,454	$1,265,050
Reserves	Cash Expenditures not resulting in change in Net Assets					
	MTW:					
	Modernization	$2,448,662				$2,448,662
	Other Loans				$2,000,000	2,000,000
	Public Improvement Bridge Loans				18,656,170	18,656,170
	Acquisitions				12,045,625	12,045,625
	Site Improvements				450,000	450,000
	Sub-total MTW:	$2,448,662			$33,151,795	$35,600,457
City Funds	City Funded Public Improvements:					
	Water & Sewer Funds				$12,957,793	$12,957,793
	Quality of Life				509,707	509,707
	Sub-total Public Improvements				$13,467,500	$13,467,500
Program Income	Other Funding Sources:					
	Homeownership Subsidy				$525,000	$525,000
	Total Cash Expenditures not resulting in change in Net Assets	$2,448,662			$47,144,295	$49,592,957

The Housing Authority of the City of Atlanta, Georgia

Overview and Highlights of the FY2009 Budget

The following provides an overview and highlights of the FY2009 Budget displayed on the previous page. Details are found in the next section, *Funding Category Assumptions.*

Revenues
On a consolidated basis, AHA projects FY2009 revenues of $231.3 million, of which MTW Block Grant funds make up $212.9 million.

Expenses
AHA expects to spend $244.6 million on expenses, with $226.0 funded by the MTW block Grant or funds generated at the property level

Capital Grant Revenue
HUD provides Capital Grant Revenue to AHA on a reimbursable basis for authorized capital expenditures. AHA has budgeted $7.2 million for modernization at the Properties which will be funded by CFP grants. Development and HOPE VI grants will fund $31.4 million for development activities.

Non Cash Expenditures
Non Cash Expenditures which will affect Net Assets but do not require the use of AHA cash will total $24.4 million.

Change in Net Assets
The total Change in Net Assets is projected to be a reduction of $864,830. Net Assets are expected to increase by $13.3 million as expenses exceed revenues. Non Cash Expenditures reduce net Assets by $24.4 million. Capital Grant Revenue of $38.6 million will offset much of the reduction. AHA will use funds received but not used in prior years to cover the shortfall.

Change in Net Assets ($Million)	
Expenses in excess of revenues	($13.29)
Non cash expenditures	($24.40)
Capital grant revenue	$38.55
Change in Net Assets	$0.86

Cash Expenditures Not Resulting in Change in Net Assets
AHA is providing additional information on the use of cash resources in the Cash Expenditures Not Resulting in Change in Net Assets section.

- MTW Block Grant funds that are received but not used in a fiscal year are available for future use for MTW authorized expenditures. AHA will use $36.0 million in previously received MTW Block Grant funds in FY2009 to support development and other MTW activities.
- The City of Atlanta will provide $13.5 million for public improvements.
- $525,000 in Perry Program Income will be used in the continued revitalization of the Perry community.

MTW Working Capital (Reserves)

AHA's MTW working capital (current assets less current liabilities) is estimated to be $75 million at June 30, 2008. This "reserve" level is the result of MTW funding in the early years of the MTW Agreement that were received but not used. Much of the reserve was accumulated as tenant protection vouchers received for opt outs and relocation were rolled into

the MTW grant. Increased tenant incomes resulting from the CATALYST program also contributed to these reserves with increased rental revenue and reduced HAP costs.

AHA's budget calls for the use of $49.3 million in MTW Reserves to support MTW Activities in FY2009.

Congressional Appropriations Process and HUD funding

The AHA FY2009 budget includes six months which will be funded in HUD's Funding Year (HFY) 2008. HUD has provided the HFY2008 funding level for AHA's Housing Choice program but has not yet provided the funding level the Public Housing Operating Fund.

The last six months of AHA's FY2009 budget will be funded using HFY 2009 funds. The Public Housing, Housing Choice Voucher and Capital programs are funded through an annual appropriations process. Because the Congressional appropriations process is not complete, we cannot be sure of the outcome of the appropriations process and its impact on AHA's FY2009 funding levels, especially in light of competing national priorities.

In light of these uncertainties, AHA's FY2009 budget is based on the best information available at the time of publication. An amendment to the FY2009 budget may be required after the appropriations process is concluded if substantial reductions are adopted by Congress and the President.

General Assumptions of this Budget

As described in AHA's FY2009 MTW Implementation Plan, AHA's activities for FY2009 will be centered on three primary goals:

- Maximize AHA's economic viability and sustainability.
- Provide quality affordable housing opportunities in mixed income communities with access to excellent quality of life amenities.
- Facilitate opportunities for families and individuals to build wealth and reduce their dependency on subsidy, ultimately becoming financially independent.

This budget was developed to support these goals. In addition, until their full implementation, the budget seeks to:

- Ensure the health and safety of AHA-assisted residents and the preservation of AHA-owned properties.
- Improve the quality of life for AHA-assisted residents and the quality of our investments.
- Re-engineer the Housing Choice Voucher Program.
- Invest in technological solutions that will improve operations in the areas of financial reporting, Housing Choice operations, security, and the development and management of a corporate database.
- Enhance AHA's asset management capabilities.

The Housing Authority of the City of Atlanta, Georgia

Recognizing the current budget realities and constraints, AHA's budget reflects that AHA's first priority is to sustain the delivery of affordable housing and services to families at AHA-owned properties and sustain and protect AHA's investments in market rate, mixed income communities.

Other Assumptions

- Effective in 2006, HUD funds both Housing Choice Voucher and Low Income Housing Programs on a Calendar Year Basis (January through December). In contrast, AHA operates on a Fiscal Year basis (July through June.) Therefore, AHA's budget year FY2009 crosses two HUD Funding Years (HFY), 2008 and 2009.

- At the time of publication, HUD has not provided AHA final funding numbers for HFY 2008 Low Income Housing Subsidy. HUD also has provided no definitive information regarding the levels of funding in 2009 which will affect the last 6 months of AHA's Fiscal Year. Given this lack of information, AHA has included its best estimates based on prior year funding levels.

- HOPE VI and other mixed-income revitalization efforts will continue to reposition obsolete and distressed AHA-owned public housing properties; and will allow AHA to focus our limited CFP funds on sustaining the high-rise and family communities until repositioning of such properties takes place. HOPE VI and RHF funds are multi-year and are addressed in the Capital Section of this document.

- All public housing properties owned by AHA as well as its corporate headquarters building will continue to be managed by professional property management firms.

- This budget includes funding for 361 full-time employees. This is an increase from the 281 full time employees authorized in FY2008. This increase in full time employees is attributable to the surge in activity relating to AHA's Quality of Life Initiative and other objectives identified in the FY 2009 MTW Implementation Plan. AHA's corporate and employee share of benefits will increase by an estimated 10% each when the policies renew in January 2009. This budget provides for that increase.

- In order to leverage and augment its staff, AHA has entered into contractual relations with various contractors and consultants to provide additional staff with specialized expertise, technical assistance and program management services for various projects and programs. These contractors assist AHA with scheduling milestones and deadlines; coordination of interdepartmental communication; strategic oversight and guidance to implement AHA goals and objectives; disciplined implementation of policies and procedures; flexible, efficient and expert staffing to meet these objectives; and improved accountability, efficiency and effectiveness. These arrangements allow AHA to deploy staff resources to a broad range of projects with appropriate expertise and quickly

increase or decrease staff to respond to the inevitable surges and downturns in meeting its diverse and complex goals, especially in a volatile Federal budget environment.

- Historical spending rates and knowledge of AHA administrative, asset management and services were used to establish budgetary levels for all revenue and expense categories

- Interest income is anticipated to be $2.1 million based on expected balances and an interest rate of 1.0%, consistent with the 90-day Treasury Bill rate. This income will be affected by changes in funding balances and changes in rates earned. However, AHA will explore alternative investments in an attempt to strengthen its economic viability.

Revenues

AHA receives revenues from a variety of sources for various purposes. These include, but are not limited to:

- Federal annual subsidies
- Federal multi-year grants
- Other government and private grants
- Resident and other rents
- Interest income
- Development and related fees
- GA HAP fee income
- Loan repayments

AHA recognizes the revenue from the annual subsidies throughout the year based upon HUD approved funding calculations; rents, interest, and other income are recognized when earned. Other revenue budgets presented in this budget are based upon anticipated earnings accordingly.

Multi-year grant awards differ from annual subsidies in that revenue is recognized when expenses are incurred. These grants operate on a reimbursement basis in contrast to annual subsidies which are based on a calculation. Therefore, grant award revenue is presented based upon anticipated expenditure levels rather than grant award levels.

The Housing Authority of the City of Atlanta, Georgia

Funding Category Assumptions

Low Income Operating Subsidy

- AHA receives Low Income Operating Subsidy as part of its MTW Block Grant. During FY2009, AHA estimates HUD will provide $27.7 million in Low Income Operating Subsidy spread across two HUD funding years (HFY) which coincide with calendar years.

- **July-December 2008 HUD Funding.** HUD implemented a new Low Income Operating Subsidy funding methodology beginning in Calendar Year 2007. This new funding methodology introduced project (property) based calculations for determining HUD subsidy. AHA submitted the calculation of its Low income Operating Subsidy for HFY2008 (Calendar Year 2008) to HUD in April 2008. HUD is using this calculation as the basis for funding January through December 2008, which includes the first six months of AHA's Fiscal Year 2009. Based on the individual property calculations and after adjusting for the currently projected proration of 84%, AHA estimates that it will be eligible for $29 million in HFY 2008 operating and utility subsidy, of which $14.5 million will be earned in AHA FY2009. HUD estimates that it will have final HFY subsidy funding levels established after May 2009.

- The projected number of Public Housing Assisted unit-months of 81,479 used in the HFY2008 Low Income Operating Subsidy funding calculation submitted to HUD was derived from the number of units eligible for subsidy in 2008 as of March 31, 2008. AHA and HUD will revise the calculation no later than July 15, 2008 based on actual occupancy through June 30, 2008.

- Communities involved in relocation under AHA's revitalization or QLI programs were budgeted to receive prorated subsidy in accordance with HUD regulations.

- Utility revenues were budgeted based upon a three-year average rate of consumption times the utility rate at the time of submission of subsidy calculations to HUD.

- **January-June 2009 HUD Funding**. The second half of AHA's FY2009 runs from January through June 2009. Calculation of this subsidy will not be submitted to HUD until September 2009 and will be based on property occupancy for AHA's FY2008, adjusted for properties coming on and off line. At this time, HUD has published neither the monthly Property Allowance Levels (PEL) nor the proration factors for 2009. A rough estimate of total HFY2009 Operating subsidy is $27.4 million, with $13.2 million earned in AHA's FY2009. AHA will continue to use Low Income Operating funds, Housing Choice Voucher budget authority, and Capital Funds as a single block grant in accordance with its MTW Agreement.

- **Rental Revenue.** AHA projects it will earn $10.0 million in resident rental income and $130,000 in other property related income during FY 2009. The minimum rent will continue at $125 per month. No changes in FY2009 rent structures are anticipated in this budget.

Rental Revenue estimates do, however, reflect the overall reduction in rent revenue as tenants relocate from QLI properties scheduled for demolition or disposition.

- **Market Rate, Mixed-Income Communities.** Market rate, mixed-income communities are budgeted using an agreed upon methodology outlined in the regulatory and operating agreements between AHA and the owner entities.

- AHA assisted residents in mixed-income communities generally earn higher incomes. As a result, rents paid by these residents are higher than at conventional public housing communities. Such higher rents, however, are not available as a revenue source for AHA's operations because AHA does not own or control these properties. Instead, these rents go to support the operations of the mixed-income property at which they are generated. Therefore, residential rental income from mixed-income properties is not included as revenue.

- **AHA-Owned Public Housing Properties.** The Private Management Companies (PMCOs), which manage AHA-owned conventional public housing properties, developed initial property budgets, working with AHA, based on AHA's objectives and goals. Initial guidance was that total property budgets could not exceed the approved FY2008 budget levels. Adjustments to these budgets were made by AHA staff to ensure the safety and security of residents and the continued viability of such properties.

- Property expense levels for our conventional public housing properties are budgeted using the following guidelines:

    - Achievement of objectives and performance goals of AHA, as owner.

    - Management fees are based on a flat per door rate and are subject to adjustments based on the property's performance.

    - Income for QLI-impacted properties was prorated based on projected occupancy. Additional expenses for security, securing vacant units and resident case management expenditures have been added to these properties.

    - Salaries are based on 1 administrative staff position per 100 units and 1 maintenance staff position per 50 units.

    - Staff training is estimated at 1% of total staff salaries.

    - Maintenance contracts and materials are computed using historic costs and/or actual contract costs for each property.

    - Resident services contract costs and training is calculated at $25 per unit per year.

    - Employee taxes and benefits are based on historical costs. Utility expenditures were

budgeted based upon a three-year average rate of consumption at projected utility rates.

- Administrative costs include CATALYST standards for enhanced criminal history and credit history checks.

- Certain exceptions were permitted to accommodate property size (acreage and units), density, property age and location.

- AHA provides funds to PMCOs to subsidize property expenses that exceed resident rents and other property-generated income.

- During FY2009, AHA will complete relocation of residents from the Martin Luther King Tower (MLK) as part of revitalization of that community. Relocation expenses for MLK are funded under the McDaniel Glenn HOPE VI revitalization grant and Replacement Housing Factor Grants and are included in the Development Budget.

- AHA will also relocate tenants from Bowen Homes, Bankhead Courts, Hollywood Courts, Thomasville Heights, Herndon Homes, Palmer House and Roosevelt House in FY2009 as part of AHA's Quality Living Initiative (QLI). Relocation and demolition expenses for these communities will be funded using MTW funds.

Housing Choice Vouchers

- **Total Housing Choice Voucher Funding**. AHA estimates it will receive approximately $172. million in total Housing Choice Voucher funding for FY2009. This includes continued HUD funding for over 16,853 vouchers currently allocated. Also included is $9.8 million that AHA anticipates receiving for an estimated 1,777 additional relocation vouchers related to AHA's QLI program. HUD awards these vouchers and provides funds on an incremental basis corresponding with the planned relocation schedule.

- **MTW Block Grant Funding**. AHA receives much of its Housing Choice Subsidy as part of its MTW Block Grant; the balance is received outside of the block grant. Of the projected $172 million in total Housing Choice Voucher funding, AHA estimates that it will receive $155 million in Housing Choice Voucher funding in the MTW Block Grant. This figure represents total MTW voucher funding, effectively including both Housing Assistance Payments (HAP) and administrative fees.

- This funding was calculated using the methodology outlined in Attachment A of the AHA's MTW Agreement and is based on the estimated number of MTW Block Grant vouchers expected to be under Annual Contributions Contract (ACC) on June 30, 2008 multiplied by the 2008 MTWPUC factor. This is the methodology which AHA uses to determine its MTW Budget Utilization Benchmark.

- **Other Voucher Funding** Other Vouchers include Special Purpose Vouchers which are not eligible for the single funding flexibility under MTW and are calculated using HUD's standard formulas for 6,300 voucher unit months. The Budget for Non-MTW Vouchers also includes new relocation vouchers related to AHA's QLI

program which AHA anticipates it will receive in FY2009.

- Based on voucher increments currently approved by HUD and projection of QLI-related relocation vouchers, AHA estimates FY2009 Special Purpose Voucher non-MTW funding to be $5.5 million in FY09 including HAP and administrative fees.

- Under AHA's MTW agreement, all voucher participants are subject to AHA's CATALYST plan regardless of the characterization of the funding of their vouchers.

- **January-June 2009 Funding.** Because HUD's Funding Year (HFY) is on a calendar year basis, the actual inflation factors and proration for the last six months of AHA's FY2009 is unknown. The FY2009 Budget uses the same funding factors for both halves of FY2009 and increases the number of non-MTW vouchers based on projected receipt of QLI-related relocation vouchers.

- **Expenditures.** The FY2009 Housing Choice budget is also based upon the following assumptions.

    - AHA will continue to pay HAP to all current voucher holders that remain qualified.

    - AHA plans to continue the strategic use of Project Based Rental Assistance to support AHA's revitalization efforts and to increase the supply and quality of housing available for qualified low-income families.

    - Relocation vouchers will continue to be issued and HAP expenses incurred in support of the AHA's QLI Program. Additional Housing Choice Voucher funding will also be used in FY2009 to support AHA's project-based rental assistance (PBRA) program.

    - The minimum rent for Housing Choice vouchers will continue to be $125 per month.

    - When establishing Housing Choice Payment Standards for the tenant-based voucher program, AHA will use AHA-developed localized Fair Market Standards and rent reasonableness standards to further AHA's goal of ending the concentration of poverty as described in AHA's Business Plan.

    - AHA projects that up to 25% of its FY2009 vouchers will port to other jurisdictions outside of the City of Atlanta. These vouchers provide rental subsidy to residents who move from Atlanta and are residing under the jurisdiction of other housing authorities (receiving authorities). HAP for these vouchers are established by receiving authorities based on their payment standards. AHA reimburses these housing authorities for the HAP payments and pays them 80% of the HUD published administrative fee for AHA. This budget uses the current average HAP cost for portability vouchers, but because AHA does not manage the HAP for vouchers which have ported outside of its

jurisdiction, the potential for increased HAP expenses exist.

Capital Funds

- HUD provides AHA with capital funds as part of its MTW block grant. AHA received $14.1 in Federal Fiscal Year 2008 Capital Funding Program (CFP) grant award. These funds must be spent over a four-year period, but AHA plans to use the majority of such funds in FY 2009 for demolition of QLI properties and modernization at AHA high rises and remaining family communities.

- In addition to expending $14.1 million of the most recent CFP grant award, AHA will use the remaining balances from prior year CFP grants for projects approved and begun in FY2009, and for new projects. AHA currently estimates the use of carryover CFP funds at $3.1 million.

HOPE VI, Replacement Housing Factor Funds, and Development Grant Awards

HOPE VI, Replacement Housing Factor, and Development Grant funds awarded to AHA are paid by HUD to AHA on a reimbursement basis for expenditures related to the revitalization of AHA-owned properties. AHA projects reimbursement of $31.4 million in HOPE VI, Replacement Housing Factor, and Development Grant funds.

In addition AHA receives funds from the City of Atlanta for public improvements. In FY2009 AHA anticipates reimbursements totaling over $13.5 million from the City.

Mark to Market

Congress extended the Mark to Market program until September 30, 2011. AHA is the designated Participating Administrative Entity for Georgia and is eligible to continue to earn fees based on the number of asset restructuring assignments approved by HUD's Office of Affordable Housing Preservation. To date AHA has restructured 23 multifamily assets. Fees earned under this business line are unrestricted. As HUD sunsets this program, however, AHA does not expect any further assignments and this budget does not reflect Mark to Market revenues or expenses.

Georgia HAP

AHA projects that it will remain responsible for administering approximately 7,400 HUD's projected-based Section 8, FHA-insured apartments in 55 properties owned by independent third parties. AHA earns monthly base fees and quarterly incentive fees as a subcontractor to Georgia HAP Administrators for conducting performance based reviews based on the level to which the consortium performs in meeting its contract obligation. The distribution of year-end revenue in excess of expenses for Georgia and Illinois is approved by Georgia HAP Administrators Board of Directors at the end of each fiscal year on an equitable basis. Based on current workload projections, AHA anticipates earning $1.5 million in unrestricted income as a subcontractor of GAHAP.

The Housing Authority of the City of Atlanta, Georgia

OTHER FUNDS

In addition to the major funds described above, AHA includes the following programs and funds in the category other funds.

Development and Transaction Fees

AHA earns development and transaction fees for services it provides in connection with mixed-income revitalization. AHA also earns interest income on subordinated loans made to the owner entities of the mixed-income communities. AHA estimates that it will earn $1.2 million in such fees. Although earned in FY2009, the payments will be made in agreed installments upon the achievement of certain development milestones in accordance with the specific financial closing documents.

Turnkey III Homebuyers Program

Based on a HUD-approved plan, AHA is currently engaged in the close-out of the Turnkey III Homebuyers Program and anticipates that all close-out activities will be completed during Fiscal Year 2008. The Turnkey III FY2009 budget provides for homeowner associations establishment and related training; conveyance of the community centers to the homeowner associations; and the establishment of the AHA-controlled trust fund.

Appendix M: Capital Planning

Major Capital Needs and Projects, Estimated Costs and Proposed Timetables

This section represents AHA's Capital Planning projects using American Recovery and Reinvestment Act (ARRA) funds and MTW Funds. As discussed in the narrative section of AHA's FY 2010 MTW Annual Plan (CATALYST Implementation Plan), during FY 2009 AHA received approximately $26.5 million in ARRA funding. AHA dedicated approximately $18.5 million to capital projects and related construction management and design fees, and approximately $8 million for demolition and related construction management fees. To the extent the $8 million does not fund all of the demolition costs for the three properties listed below, the balance of such demolition costs will be funded through the MTW Funds. The $8 million portion of ARRA funding dedicated to demolition is focused on three of the seven QLI Phase II properties: Bankhead Courts, Hollywood Courts and Thomasville Heights.

AHA has established three priorities for the $18.5 million in ARRA funds dedicated to capital projects:

(1) the health and safety of our residents,
(2) sustainability, energy efficiency and the viability of AHA-owned properties,
(3) quality of life enhancements.

The following chart outlines the major work items that will be completed using the ARRA funds. Detail on these work items is included in the Annual Statement Part I and II which is included in Appendix U of this Plan. It should be noted that although this Appendix provides intended uses and dollar amounts for the ARRA funds, to the extent that bids come in favorable for planned work items, AHA may adjust the planned expenditures to include (1) fund the balance of the demolition costs at Hollywood Courts, based on current cost estimates; (2) demolition at additional QLI Phase II properties; (3) additional rehabilitation at the longer-term hold communities; and/or, (4) implement additional projects identified in AHA's Physical Needs Assessment.

Planned Expenditures for ARRA Grant

Capital Projects	Account No.	Grant Budget	Property
Dwelling Structures/Major systems - Improvements to building envelop, major systems and dwelling units to include energy efficiency improvements.	1460	$13,038,335	Barge Rd. Cheshire Bridge Cosby Spears East Lake Georgia Ave. Hightower Juniper & 10th Marian Rd. Marietta Road Martin St. Plaza Peachtree Rd. Piedmont Rd. Westminster
Site Improvements - Parking lot, sidewalk and street repairs as well as erosion control, landscaping and exterior recreation space enhancements.	1450	$1,264,545	Barge Road Cheshire Bridge Cosby Spears East Lake Georgia Ave. Hightower Juniper & 10th Marian Rd. Marietta Rd. Martin St. Plaza Peachtree Rd. Piedmont Rd. Westminster

Planned Expenditures for ARRA Grant (continued)

Capital Projects	Account No.	Grant Budget	Property
Common Areas - Lobby, common area and specialty function room renovations.	1470	$1,828,182	Barge Rd. Cheshire Bridge Cosby Spears East Lake Georgia Ave. Hightower Juniper & 10th Marian Rd. Marietta Rd. Martin St. Plaza Peachtree Rd. Piedmont Rd. Westminster
Non- Dwelling Equipment - Computers, common area equipment, laundry facility washers/dryers	1475	$503,636	Barge Road Cheshire Bridge Cosby Spear East Lake Georgia Ave. Hightower Juniper & 10th Marian Rd. Marietta Rd. Martin St. Plaza Peachtree Rd. Piedmont Rd. Westminster
Fees and Costs - design and construction management fees for capital projects and demolition.	1430	$2,671,743	Bankhead Barge Road Cheshire Bridge Cosby Spear East Lake Georgia Avenue Hightower Hollywood Juniper & 10th Marian Rd. Marietta Rd. Martin St. Plaza Peachtree Rd. Piedmont Rd. Thomasville Westminster
Demolition	1485	$7,272,727	Bankhead Courts Hollywood Courts Thomasville
Total:		$26,579,168	

The following two charts outlines the use of AHA's MTW funds to support demolition and gap financing needs during FY 2010:

Capital Projects for MTW Funds*	Grant Budget	Property
Demolition and CM Fees other than ARRA	$4,500,000	Bowen Herndon Hollywood Palmer Roosevelt
Total:	$4,500,000	

**Capital projects previously budgeted using MTW funds that were underway during FY 2009 may be completed in FY 2010 and are not detailed in this section.*

Development Financing	Grant Budget	Property
Gap Financing for Development	$5,500,000	Various Developments

ARRA Competitive Capital Funds

In response to HUD's release of Notice of Funding Availability (NOFA) for the $1 billion in ARRA competitive Capital Funds, AHA will make application for a portion of these funds. Based on the eligible uses, AHA will apply to support development activities to further the revitalization of Perry, Carver, Capitol, Grady, Harris, McDaniel Glenn, Techwood-Clark Howell; acquisitions that support revitalization; redevelopment of AHA-owned buildings or land; additional rehabilitation of AHA's longer-term hold properties. AHA may also apply for other projects captured in its Physical Needs Assessment.

Demolition and Disposition Activities

AHA's FY 2010 demolition and disposition activities are described in the Revitalization, QLI and Asset Management sections of the FY 2010 CATALYST Implementation Plan.

Appendix N - Previous Year's Expenditures by Line Item

The Atlanta Housing Authority
Financial Highlights

Condensed Statements of Net Assets

June 30

	2008	2007
ASSETS		
Current assets	$ 151,259,506	$ 131,255,864
Non-current assets	$ 281,386,279	$ 285,522,042
Total Assets	**$ 432,645,785**	**$ 416,777,906**
LIABILITIES		
Current liabilities	$ 58,743,359	$ 39,195,882
Non-current liabilities	$ 6,444,003	$ 7,606,830
Total Liabilities	**$ 65,187,362**	**$ 46,802,712**
NET ASSETS	$ 367,458,423	$ 369,975,194
Total Liabilities and Net Assets	**$ 432,645,785**	**$ 416,777,906**

Condensed Statements of Revenues, Expenses and Change in Net Assets

June 30

	2008	2007
REVENUES		
Operating revenues	$ 245,827,538	$ 198,105,661
Non-operating revenues	$ 34,261,297	$ 37,008,607
Total Revenues	**$ 280,088,835**	**$ 235,114,268**
EXPENSES		
Operating expenses (including depreciation)	$ 210,071,839	$ 187,537,792
Non-operating expenses	$ 72,533,767	$ 18,286,875
Total Expenses	**$ 282,605,606**	**$ 205,824,667**
Change in Net Assets	**$ (2,516,771)**	**$ 29,289,601**

Appendix O – MTW Implementation Protocols

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

IMPLEMENTATION PROTOCOL
UPDATED REFERENCE CHART

Atlanta Housing Authority

February 3, 2009

Via FedEx Overnight Delivery
Ivan M. Pour, Program Director
Moving to Work Demonstration Program
U.S. Department of Housing and Urban Development
Office of Public Housing Investments
451 Seventh Street, SW, Room 4130
Washington, D.C. 20410

Re: The Housing Authority of the City of Atlanta, Georgia ("AHA") -- Implementation Protocol Updated Reference Chart

Dear Ivan:

As you are aware, AHA's HUD-approved implementation protocols (the "Implementation Protocols") are included in AHA's Amended and Restated MTW Agreement (the "Restated MTW Agreement"), effective as of November 13, 2008, as further amended effective January 16, 2009, by virtue of their incorporation by reference in Attachment E of the Restated MTW Agreement. The Implementation Protocols currently include certain references to AHA's Original MTW Agreement (as defined in the Restated MTW Agreement) which are no longer accurate.

AHA's Restated MTW Agreement, however, includes language which is identical or substantially similar to the language in AHA's Original MTW Agreement that supports the Implementation Protocols. The Restated MTW Agreement also includes the same authorizations which formed the original basis for these Implementation Protocols.

To address the outdated references to AHA's Original MTW Agreement in the Implementation Protocols, we have prepared and attached an updated reference chart which identifies comparable references to AHA's Restated MTW Agreement. We will also submit this chart as part of AHA's FY2010 Catalyst Plan (Annual MTW Plan). We believe that the correction of the references is purely administrative and does not affect the substance of the authorizations and guidance contained in the Implementation Protocols. Therefore, AHA will continue to operate our MTW program in accordance with the Restated MTW Agreement, including the Implementation Protocols.

If you have any questions regarding the updated reference chart, please do not hesitate to call me at 404-817-7293.

Sincerely,

Gloria J. Green
General Counsel and Chief Legal Officer

Attachment (1)

cc: Dominique Blom, HUD
Eugene Geritz, HUD
Marianne Nazzaro, HUD
Renée Lewis Glover, AHA
Adrienne Walker, AHA
Althea Broughton, AGG

IMPLEMENTATION PROTOCOL UPDATED REFERENCE CHART

MTW IMPLEMENTATION PROTOCOLS	ORIGINAL MTW REFERENCE	AMENDED AND RESTATED MTW AGREEMENT
ACC Waiver	Article I - HUD Program Requirements and Other Federal Requirements; Appendix A - Statement of Authorizations; Attachment A - Calculation of Subsidies; Attachment B - MTW Annual Plan and Report Elements; and Attachment E - AHA MTW Program Compliance Requirements.	Article I - Statutory Authorizations; Legacy Attachment A - Calculation of Subsidies; Legacy Attachment B - Elements for the Annual MTW Plan and Annual MTW Report; Attachment D - Legacy and Community Specific Authorizations; Attachment E – Implementation Protocols; and the Second Amendment.
Alternate Resident Survey	Attachment B - MTW Annual Plan and Report Elements, Section IX.	Legacy Attachment B - Elements for the Annual MTW Plan and Annual MTW Report, Section IX.
Fee for Service Methodology	Appendix A - Statement of Authorizations, Section V.A.2.	Attachment D - Legacy and Community Specific Authorizations, Sections V.A. 2 and VI; and First Amendment, Section 4.
Identity of Interest	Appendix A - Statement of Authorizations, Section VII.C.	Attachment D - Legacy and Community Specific Authorizations, Section VIII.C.
MTW Mixed-Finance Closing Procedures	Appendix A - Statement of Authorizations, Section V.A.2.	Attachment D - Legacy and Community Specific Authorizations, Section V.A.2.
Program Flexibility for Special Purpose Vouchers	Article I.B of the MTW Agreement; Appendix A - Statement of Authorizations, Article V, Section A; and Article VI, Section A.	Article I - Statutory Authorizations, Section D; and Attachment D - Legacy and Community Specific Authorizations, Sections V.A.1 VII.A.
Revision of MTW Benchmarks	Attachment D – MTW Program Benchmarks	Legacy Attachment D – MTW Program Benchmarks and MTW Program Benchmark Definitions
Use of MTW Funds	Recitals; Article I - HUD Program Requirements and Other Federal Requirements, Sections A, B, G and H; Appendix A - Statement of Authorizations, Section I.D, I.F, V.A.1, V.A.2, V.A.4, V.A.5, V.C.2, V.C.3, VI.B.4, and VII.C; and Attachment G, Good Cause Justification for the Waiver of Sections of 24 CFR 941.	Recitals; Article I - Statutory Authorizations, Sections A, B and D; Article II - Requirements and Covenants, Sections B and D; Attachment D - Legacy and Community Specific Authorizations, Sections I.G, I.I, V.A.1, V.A.2, V.A.4, V.A.5, V.C.2, V.C.3, VII.B.4, VII.C.4, and VIII.B.5; Legacy Attachment G, Good Cause Justification for the Waiver of Sections of 24 CFR 941 and the Second Amendment.

Appendix O – MTW Implementation Protocols

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

MTW AGREEMENT
REVISION OF MTW BENCHMARKS PROTOCOL

THE HOUSING AUTHORITY OF THE CITY OF ATLANTA, GEORGIA (AHA)
MTW AGREEMENT
REVISION OF MTW BENCHMARKS PROTOCOL

The Housing Authority of the City of Atlanta, Georgia (AHA) and the United States Department of Housing and Urban Development (HUD) are parties to a Moving to Work Demonstration Agreement (MTW Agreement), effective July 1, 2003. Since the execution of the MTW Agreement, AHA has clarified the MTW Benchmarks and their corresponding outcome measures included in Attachment D of its MTW Agreement in order to align them with AHA's Business Plan objectives.

Revised Benchmarks and Outcome Measures

Program Benchmark Definitions. Attachment D of AHA's Moving to Work (MTW) Agreement executed September 25, 2003, provides definitions for each of eleven MTW Program Benchmarks. Since the execution of its MTW Agreement, AHA has revisited these definitions and their corresponding outcome measures in order to align them with AHA's Business Plan objectives. The table below reflects the realignment and further clarification of AHA's MTW Program Benchmarks in comparison with the original language in AHA's MTW Agreement:

MTW Program Benchmark Definitions

Original Definitions	Clarified Definitions
Public Housing Program	Public Housing Program (See Note A below)
% Rents Uncollected Annual percentage of rents that is uncollected.	% Rents Uncollected Gross tenant rents receivable through the last day of the Fiscal Year (FY) divided by the total amount of tenant rents billed during the FY shall be less than or equal to the target benchmark.
Occupancy Rate Annual physical occupancy rate.	Occupancy Rate The ratio of occupied public housing units to available units as of the last day of the FY shall be greater than or equal to the target benchmark. (See Note B below)

Appendix O – MTW Implementation Protocols

MTW Program Benchmark Definitions – continued

Original Definitions	Clarified Definitions
Public Housing Program	Public Housing Program (See Note A below)
Emergency Work Orders Completed or Abated in <24 Hours Percentage of emergency work orders that will be completed or abated in less than 24 hours.	Emergency Work Orders Completed or Abated in <24 Hours The percentage of emergency work orders that are completed or abated within 24 hours of issuance of the work order shall be greater than or equal to the target benchmark. (Abated is defined as "emergency resolved through temporary measure, and a work order for long term resolution has been issued.")
Routine Work Orders Completed in < 30 Days Percentage of routine work orders that will be completed in less than 30 days.	Routine Work Orders Completed in < 7 Days The average number of days that all non-emergency work orders will be active during the FY shall be 7 days or less.
% Planned Inspections Completed Percentage of all units inspected and common areas.	% Planned Inspections Completed The percentage of all occupied units and common areas that are inspected during the FY shall be greater than or equal to the target benchmark. (See Note C below)
Housing Choice Program (Section 8)	Housing Choice Program (Section 8)
Budget Utilization Rate Annual percentage of Housing Choice Budget authority spent on housing assistance payments and administration.	Budget Utilization Rate The expenditure of FY Housing Choice Annual Budget allocation for MTW vouchers utilized for MTW eligible activities will be greater than or equal to the target benchmark of 98%. (See Note D below)
% Planned Annual Inspections Completed Annual percentage of occupied units inspected.	% Planned Annual Inspections Completed The percent of all units under contract that are inspected directly by AHA or any other agency responsible for monitoring the property during the fiscal year shall be greater than or equal to the target benchmark by the last day of the fiscal year.

Appendix O – MTW Implementation Protocols

MTW Program Benchmark Definitions – continued

Original Definitions	Clarified Definitions
Housing Choice Program (Section 8)	Housing Choice Program (Section 8)
Quality Control Inspections Annual percentage of previously inspected units (initial or renewal inspection) that will be inspected again for quality control purposes.	Quality Control Inspections The percent of quality control inspections on units inspected directly by AHA during the fiscal year shall be greater than or equal to the target benchmark.
Community and Supportive Services	Community and Supportive Services
Resident Homeownership Annual number of Public Housing or Housing Choice residents who close on purchasing a home.	Resident Homeownership The number of Public Housing residents, Housing Choice Voucher participants, and other income eligible families who close on purchasing a home during the FY, regardless of participation in a homeownership counseling program, shall be greater than or equal to the target benchmark.
Resident Workforce Participation Annual number of Public Housing or Housing Choice heads of households (excluding elderly and disabled) who are in the workforce.	Household Work/Program Compliance The annual percentage of Public Housing and Housing Choice assisted households that are Work/Program compliant (excluding elderly and disabled members of the households) through the last day of the FY shall be greater than or equal to the target benchmark. (See Note E below)
Finance	Finance
Project –Based Financing Closings Annual number of properties refinanced using project based financing demonstration principles.	Project –Based Financing Closings The annual number of projects in which AHA will commit project-based vouchers and/or make an investment of MTW funds. (See Note E below)

Notes:

A. Public Housing Program - General. Information for the Public Housing Program includes information for both AHA-owned public housing communities and the public housing assisted units at AHA-sponsored mixed-income communities ("Signature Properties").

B. Public Housing Program – Occupancy Rates. Available Units: Units that are defined as dwelling units (occupied or vacant) under AHA's Annual Contributions Contract (ACC), that are available for occupancy, after adjusting for four categories of exclusions:

1. Units Approved For Non-Dwelling Use: These are units that are HUD approved for non-dwelling status for the use in the provision of social services, charitable purposes, public safety activities, and resident services, or used in the support of economic self-sufficiency and anti-drug activities.
2. Employee Occupied Units: These are units that are occupied by employees who are required to live in public housing as a condition of their job, rather than the occupancy being subject to the normal resident selection process.
3. Vacant Units Approved For Deprogramming: These are units that are HUD approved for demolition/disposition.
4. Temporarily Off-Line Units: Units undergoing modernization and/or major rehabilitation.

C. Public Housing Program - % Planned Inspections Completed. Units exempted from the calculation for this purpose include the following:

1. Occupied units for which AHA has documented two attempts to inspect the unit and where AHA has initiated eviction proceedings with respect to that unit.
2. Vacant units that are undergoing capital improvements.
3. Vacant units that are uninhabitable for reasons beyond AHA's control due to:
   a) Unsafe levels of hazardous/toxic materials;
   b) An order or directive by a local, state or federal government agency;
   c) Natural disasters; or
   d) Units kept vacant because they are structurally unsound and AHA has taken action to rehabilitate or demolish those units.
4. Vacant units covered in an approved demolition or disposition application.

D. Housing Choice Budget Utilization. AHA's MTW Housing Choice Budget Utilization benchmark requires that the expenditure of fiscal year Housing Choice Annual Budget allocation for MTW vouchers utilized for MTW eligible activities be greater than or equal to the target benchmark of 98%. In its FY 2007 Implementation Plan, AHA added clarifying language for this benchmark. As part of the FY 2008 Implementation Plan, AHA has included further clarifying language that the 98% expenditure rate only applies to vouchers that are fully funded during AHA's entire fiscal year,

and that any new vouchers received intermittently during the fiscal year are excluded from the 98% requirement until the following fiscal year until such time that a 12-month period has elapsed. AHA is making this clarification in light of changes that HUD has made in funding vouchers based on a calendar year versus a fiscal year.

E. Community and Supportive Services – Household Work/Program Compliance. This benchmark is further clarified to align the previous Resident Workforce Participation benchmark with measuring resident and participant compliance with AHA's Work/Program Compliance policy. Since the execution of AHA's MTW Agreement, the agency has implemented a Work/Program Compliance policy requiring one adult (age 18-61, excluding elderly and disabled persons) in the household to work full-time at least 30 hours per week and all other adults in the household to be either work or program compliant (see table below for compliance meanings).

CATALYST Compliance Meanings

Full-time Worker	• Employed for 30 or more hours per week
Participation in an approved program	• attending an accredited school as a "full time" student • participating in an approved "full-time" training program • attending an accredited school as a "part time" student, AND successfully participating in an approved "part-time" training program
Part-time Job and Part-time Program Participant	• Employed as a part-time employee (at least 16 hours) AND successfully participating in an approved training program • Employed as a part-time employee (at least 16 hours) AND successfully participating in an accredited school as a "part-time" student

The following timelines apply to AHA's Work/Program Compliance requirements:

12/31/05: 1 target adult in the household to be work/program compliant

6/30/06 and thereafter: 1 target adult in the household to be work compliant and all other adults in the household to be either work or program compliant

F. Finance – Project-based Financing Closings. This benchmark is further clarified with measuring AHA's progress in facilitating the creation of healthy mixed-income communities owned by private entities by committing project-based vouchers to a percentage of the units and/or investing MTW funds to promote or support the development or rehabilitation of housing units that are affordable to low-income families.

Measurable Outcomes. Attachment D of AHA's Moving to Work (MTW) Agreement also includes measurable outcomes for each of the eleven benchmarks defined above. AHA is revising the measurable outcomes based on lessons learned during the MTW Agreement period and to align better measurements with the clarified definitions indicated above. As a result and as reflected in the table below, the measurable outcomes for the following program measures have been revised: (1) Household Work/Program Compliance, and (2) Project-based Financing Closings.

MTW Program Benchmarks – Measurable Outcomes

Measurable Outcome	Baseline	Yr1 FY04	Yr2 FY05	Yr3 FY06	Yr4 FY07	Yr5 FY08	Yr6 FY09	Yr7 FY10
Public Housing Program								
% Rents Uncollected	2%	≤2%	≤2%	≤2%	≤2%	≤2%	≤2%	≤2%
Occupancy Rate (See Note A below)	98%	≥98%	≥98%	≥98%	≥98%	≥98%	≥98%	≥98%
Emergency Work Orders Completed or Abated in < 24 Hours	99%	≥99%	≥99%	≥99%	≥99%	≥99%	≥99%	≥99%
Routine Work Orders Completed in < 7 Days	5 Days	100%	100%	100%	100%	100%	100%	100%
% Planned Inspections Completed	100%	100%	100%	100%	100%	100%	100%	100%
Housing Choice Program (Section 8)								
Budget Utilization Rate	98%	≥98%	≥98%	≥98%	≥98%	≥98%	≥98%	≥98%
% Planned Annual Inspections Completed	98%	≥98%	≥98%	≥98%	≥98%	≥98%	≥98%	≥98%
Quality Control Inspections	≥1.4%	≥1.4%	≥1.4%	≥1.4%	≥1.4%	≥1.4%	≥1.4%	≥1.4%
Community and Supportive Services								
Resident Homeownership	6	35	35	70	85	100	110	120
Household Work/Program Compliance (See Note B below)	N/A	N/A	N/A	55%	62%	71%	74%	75%
Finance								
Project-Based Financing Closings (See Note C below)	0	6	6	6	6	6	6	6
Investment Deals Involving MTW Funds (See Note C below)	0	0	0	1	1	1	1	1

Notes:

A. Public Housing – Occupancy Rate. As discussed under Program Benchmark Definitions, AHA will achieve the measurable outcome for the occupancy rate benchmark after recognizing that certain categories of vacant units will be excluded as described in Note B of the performance measure chart.

In the event that the occupancy rate of an AHA-owned public housing community falls below 93% of the total number of units for a period of twelve (12) consecutive months because of the lack of qualified applicants on the site-based waiting list (that is, after exhausting all marketing attempts during that 12 month period), or in the event that the rents collected plus the available Section 9 subsidy for an AHA-owned public housing community are not sufficient to sustain the property on a cash flow basis at the 93% occupancy level as demonstrated by the audited financial statements for that property, then AHA intends to conduct a viability analysis of the property looking at the following factors:

(i) physical condition;
(ii) obsolescence;
(iii) lack of market interest; and
(iv) cost of upgrading the property to market conditions compared to allowable Total Development Cost Limits.

If the property viability analysis supports such action, AHA would (1) submit a demolition/disposition application and apply for Section 8 vouchers in accordance with applicable regulations, and (2) pursue one of the following strategies:

a. Implement a revitalization strategy for the property;
b. Sell the property and use the proceeds to support or promote affordable housing for low-income families; or
c. Land bank the vacant land for future revitalization or sale, as appropriate.

B. Community and Supportive Services – Household Work/Program Compliance. As discussed under Program Benchmark Definitions, this benchmark is further clarified to align the previous Resident Workforce Participation benchmark with measuring resident and participant compliance with AHA's Work/Program Compliance policy. In this regard, AHA has established measurable outcomes for the remaining period of its MTW Agreement. The measurable outcome for Household Work/Program Compliance will exclude from that measurement all non-compliant households that have been notified of non-compliance and the resulting consequence of either lease or program termination, including in-process evictions or program terminations, as applicable.

C. Finance – Project-based Financing Closings. As discussed under Program Benchmark Definitions, this benchmark is also further clarified to align to measure AHA's progress in facilitation of the creation of healthy mixed-income communities owned by private entities by committing project-based vouchers and/or investing MTW Funds to promote or support the development or

rehabilitation of housing units that are affordable to low-income families.

HUD Review

AHA has adopted these clarifications in the absence of any prior HUD notice that they are in direct violation of specific provisions of the MTW Agreement and its Statement of Authorizations.

Appendix O – MTW Implementation Protocols

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

MTW IMPLEMENTATION PROTOCOLS
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THE HOUSING AUTHORITY OF THE CITY OF ATLANTA, GEORGIA (AHA) MTW AGREEMENT
HOPE VI AND OTHER HUD-FUNDED MASTER PLANNED ON AND OFF-SITE DEVELOPMENTS SITE AND NEIGHBORHOOD STANDARDS PROTOCOL

The Housing Authority of the City of Atlanta, Georgia ("AHA") and the United States Department of Housing and Urban Development ("HUD") are parties to an Amended and Restated Moving to Work Agreement, dated as of November 13, 2008, as amended by that certain Second Amendment to the Moving to Work Agreement, effective as of January 16, 2009 (the "MTW Agreement"). AHA has developed its own Site & Neighborhood Standards.

MTW Agreement Reference

In accordance with the provision of the Section VIII.C.1 of Attachment D of the AHA's MTW Agreement, the regulatory requirements of 24 CFR Part 941 shall not apply to the implementation of the activities of AHA except for the provisions of 24 CFR 941.202, 24 CFR 941.207, 24 CFR 941.208, 24 CFR 941.209, 24 CFR 941.602(d), 24 CFR 941.610(b) all as modified by the terms of Attachment D; provided, however, that in determining the location of six or more newly constructed or substantially rehabilitated units or developments, AHA is authorized to adopt the alternative Site and Neighborhood Standards set forth in Section VII.B.3 of Attachment D of AHA's MTW Agreement.

AHA Protocol for Site and Neighborhood Standards related to HOPE VI Replacement Housing and Other HUD-funded Master Planned On-Site and Off-Site Developments.

As reflected in Section VII.B.3 of Attachment D of AHA's MTW Agreement, AHA no longer uses the HUD Site & Neighborhood Standards ("HUD Standards") for Project Based Rental Assisted (PBRA) units. In lieu of the HUD Standards, AHA has developed its own site and neighborhood standards for PBRA developments while complying with the Fair Housing Act and Title VI of the Civil Rights Act of 1964. AHA PBRA Site & Neighborhood Standards are in accordance with the requirements found within Section VII.B.3 of Attachment D of AHA's MTW Agreement.

AHA has elected to adopt the PBRA Site & Neighborhood Standards as set forth in Section VII.B.3 of Attachment D of AHA's MTW Agreement for the evaluation of HOPE VI and other HUD-funded master planned developments on-site and off-site housing that otherwise do not meet HUD Site

and Neighborhood Standards. In HOPE VI developments where the ''surrounding neighborhood'' is defined in the applicable NOFA as a three-mile radius of the site of the existing project, the PBRA Site & Neighborhood Standards as set forth in Section VII.B.3 of Attachment D of AHA's MTW Agreement shall be applied to the areas beyond the defined three-mile radius. These sites are: Grady Homes, McDaniel Glenn and Capitol Homes.

In HOPE VI developments where the ''surrounding neighborhood'' is not defined, the PBRA Site & Neighborhood Standards as set forth in Section VII.B.3 of Attachment D of AHA's MTW Agreement shall be applied to all off-site developments. These sites are: Carver Homes, Perry Homes and Harris Homes.

This protocol shall apply to any future HOPE VI and other HUD-funded master planned on and off-site development sites.

HUD Review

Submitted in AHA's FY 2008 and 2009 CATALYST Implementation Plans. Pending HUD's final approval.

Appendix O – MTW Implementation Protocols

THE HOUSING AUTHORITY OF THE CITY OF ATLANTA, GEORGIA (AHA)
MTW AGREEMENT
PROCESS FOR MANAGING REPLACEMENT HOUSING FACTOR (RHF) FUNDS

The Housing Authority of the City of Atlanta, Georgia ("AHA") and the United States Department of Housing and Urban Development ("HUD") are parties to an Amended and Restated Moving to Work Agreement, dated as of November 13, 2008, as amended by that certain Second Amendment to the Moving to Work Agreement effective as of January 16, 2009 (the "MTW Agreement"). Using its MTW flexibility, AHA will use the following process for managing Replacement Housing Factor ("RHF") funds.

MTW Agreement Reference

In accordance with Section V.A.1 of Attachment D of AHA's MTW Agreement, AHA is authorized to combine operating subsidies provided under Section 9 of the 1937 Act (42 U.S.C. 1437g), capital funding (*including development and replacement housing factor funds*) provided under Section 14 of the 1937 Act (42 U.S.C. 1437l) and assistance provided under Section 8 of the 1937 Act for the voucher programs (42 U.S.C. 1437f) to fund HUD approved MTW activities. AHA has elected to follow HUD guidance in its use as outlined in Sections V.A.1 and V.A.5 of AHA's MTW Agreement and this protocol.

AHA Process for Managing Replacement Housing Factor (RHF) Funds

In accordance with HUD guidance, upon award of annual increments of RHF Funds from HUD, AHA will determine whether to use the increments in one of the following manners:

1. Separately for the construction or acquisition of replacement housing. If used separately, each award will be subject to the normal statutory two-year obligation and four-year expenditure requirements.

2. Combined with previously accumulated awards to accrue sufficient funds to support a replacement housing construction or acquisition project(s). If combined with up to four years of accumulated previous awards (thus creating a five-year accumulation) the obligation and expenditure deadlines for the entire accumulation becomes the normal statutory dates for the most recent award.

3. Establish a new one to five year accumulation period, provided that either or both increments includes a new tier in that fiscal year. In this case, the obligation and expenditure deadlines for the entire accumulation will become the normal statutory dates for the last award in the accumulation.

AHA will notify the Atlanta HUD Field Office of the decision to accumulate the funds and their intended use in a schedule of *Proposed Use of RHF Funds*. Based on the selection of the alternatives listed above, AHA may have more than one accumulation of RHF funds available at one time.

Changes may occur in tax credit awards, increases in construction cost and other unanticipated events that may require changes in the exact amounts of funds allocated to each development and each phase in this RHF plan. In this event AHA will notify HUD that changes in allocations are required. The obligation and expenditure dates and total funding amount will not change.

RHF funds may be expended for the pro rata share of all development costs including, but not limited to, acquisition of property for the development of housing affordable to low income families, relocation of residents, demolition and site improvement of land to be used for housing affordable to low income families, construction of housing, administrative costs, and fees and costs. RHF may not be used for Community Supportive Services (CSS) or for demolition costs if a HOPE VI Demo Grant has been awarded to AHA.

The use of RHF funds will be identified in Exhibit F1 Sources and Uses for each phase in conjunction with the closing of each phase. Funds required prior to closing for predevelopment costs on projects identified in the accumulation will be requested from the local HUD office and AHA's MTW liaison, Eugene Geritz.

AHA's MTW Annual Report will address the use of Replacement Housing Factor funds in the context of AHA's revitalization program and will refer to the RHF plan for details.

Although all increments identified in the RHF plan have the same Obligation and Expenditure End Dates, each annual increment award must be at least 90% obligated by its Obligation End Date. Should the situation arise that the sequence of actual use of the grants causes some awards to be 100% obligated, but others to fall below 90%, AHA will work with OPHI to funge the expenditures to allow all awards to meet the 90% standard.

HUD Review

Although this Protocol was included in AHA's HUD-approved FY 2008 CATALYST Implementation Plan, Eugene Geritz, AHA's HUD-appointed MTW liaison advised AHA that unless otherwise notified by HUD the approval of protocols are documented outside of the annual plan review.

Proposed Use of Replacement Housing Factor (RHF) Funds

Grant year	Increment	RHF Available	2003-1	2003-2	Total	2004-1	2004-2	Total	2005-1	2005-2	Total	2006-1	2006-2	Total	2007	Total Allocated
2003	1	3,432,489	3,432,489													3,432,489
	2	2,435,481		2,435,481												2,435,481
2004	1	4,540,123				4,540,123										4,540,123
	2	3,398,919					3,398,919									3,398,919
2005	1	2,712,327							2,712,327							2,712,327
	2	5,292,808								5,292,808						5,292,808
2006	1	1,567,427										1,567,427				1,567,427
	2	5,941,122											5,941,122			5,941,122
2007	1&2	7,500,000													7,500,000	7,500,000
			3,432,489	2,435,481	5,867,970	4,540,123	3,398,919	7,939,042	2,712,327	5,292,808	8,005,135	1,567,427	5,941,122	7,508,549	7,500,000	36,820,696
Grady																
Phase	**Closing Date**	**RHF Needed**	**2003-1**	**2003-2**	**Total**	**2004-1**	**2004-2**	**Total**	**2005-1**	**2005-2**	**Total**	**2006-1**	**2006-2**	**Total**	**2007**	**Total Allocated**
Increment			**3,432,489**	**2,435,481**	**5,867,970**	**4,540,123**	**3,398,919**	**7,939,042**	**2,712,327**	**5,292,808**	**8,005,135**	**1,567,427**	**5,941,122**	**7,508,549**	**7,500,000**	**66,141,392**
Phase I	21 HO	-														-
Phase II	38 PH	Jun-07	4,370,845	3,432,489	938,356											4,370,845
Phase III	54 PH	Jun-08	5,672,995										4,776,838		896,157	5,672,995
Phase IV	53 PH	Jun-09	-													-
Phase V	14 HO	Jun-09	-													-
Phase VI (Graves)	195 PH	Jun-09	6,603,843												6,603,843	6,603,843
Phase VII (Graves Annex)	36 PH	TBD	-													-
Phase VIII (University)	45 PH	TBD	-													-
Phase IX (University)	20 HO	TBD	-													-
Public Improvements Bridge or Acquisitions															-	-
		16,647,683	3,432,489	938,356	4,370,845	-	-	-	-	-	-	-	4,776,838	4,776,838	7,500,000	16,647,683
Balance Available			**-**	**1,497,125**	**1,497,125**	**4,540,123**	**3,398,919**	**7,939,042**	**2,712,327**	**5,292,808**	**8,005,135**	**1,567,427**	**1,164,284**	**2,731,711**	**-**	**16,647,683**
McDaniel Glenn																
Phase	**Closing Date**	**Total Needed**	**2003-1**	**2003-2**	**Total**	**2004-1**	**2004-2**	**Total**	**2005-1**	**2005-2**	**Total**	**2006-1**	**2006-2**	**Total**	**2007**	**Total Allocated**
Increment		0														
Phase I		-														0
Phase II	Dec-06	-														0
Phase III	Dec-06	-														0
Phase IV	Jul-07	11,348,419	-	1,497,125		4,540,123	3,398,919		1,912,252							11,348,419
Phase V	Jul-07	8,824,594							800,075	5,292,808		1,567,427	1,164,284			8,824,594
Phase VI	Jul-08	-														0
Phase VII	Jul-08															0
Public Improvements Bridge or Acquisitions															-	-
Subtotal		20,173,013	-	1,497,125	1,497,125	4,540,123	3,398,919	7,939,042	2,712,327	5,292,808	8,005,135	1,567,427	1,164,284	2,731,711	-	20,173,013
Total			3,432,489	2,435,481	5,867,970	4,540,123	3,398,919	7,939,042	2,712,327	5,292,808	8,005,135	1,567,427	5,941,122	7,508,549	7,500,000	36,820,696

May 15, 2007

Ms. Dominique Blom
Deputy Assistant Secretary of Public Housing Investment
U.S. Department of Housing and Urban Development
451 7th Street, S.W.
Washington, DC 20410-5000

Dear Ms. Blom:

RE: Use of Replacement Housing Factor grants, Fiscal Years 2003-2007

I want to express my appreciation for the opportunity you gave Ken Sadeckas and me to meet with you and your staff on April 17th to discuss the use of Replacement Housing Factor (RHF) grants. Not only was this meeting extremely informative, but we believe that we came away with a very viable plan to use the Fiscal Year 2003-2007 RHF grants and a template for using future RHF awards. The following outlines our understanding of the issues that were discussed. Please let me know if any of these need to be revised.

- HUD staff confirmed that the Atlanta Housing Authority (AHA) could treat all of the funds received in the Fiscal Year 2003-2007 RHF grant awards, both first and second increments, as having been accumulated for use as part of the HOPE VI revitalizations of McDaniel Glenn and Grady Homes.

- AHA's RHF plan for using the first and second increments of these grants is identified in the attached document, "Proposed Use of RHF Funds." The amounts indicated for Fiscal year 2007 are estimates and will be adjusted when funding is identified.

- Changes may occur in tax credit awards, increases in construction cost and other unanticipated events that may require changes in the exact amounts of funds allocated to each development and each phase in this RHF plan. In this event AHA will notify HUD that changes in allocations are required. The obligation and expenditure dates and total funding amount will not change.

Use of Replacement Housing Factor grants, Fiscal Years 2003-2007

May 15, 2007

Page 2

- HUD's Office of Public Housing Investments (OPHI) staff and AHA agreed that the RHF funds may be expended for the pro rata share of all development costs including, but not limited to, acquisition of property for the development of housing affordable to low income families, relocation of residents, demolition and site improvement of land to be used for housing affordable to low income families, construction of housing, administrative costs, and fees and costs. RHF may not be used for Community Supportive Services (CSS) or for demolition costs if a HOPE VI Demo Grant has been awarded to AHA.

- HUD's Office of Capital Improvements has established new Obligation and Expenditure End Dates of December 29, 2009 and December 29, 2011 respectively for all increments of the RHF grants awarded in Federal Fiscal Years 2003 through 2006 and will establish the same dates for Federal Fiscal Year 2007 awards. OCI also established Obligation Start dates of December 12, 2007, but will revise these dates to accommodate actual expenditures upon receipt of a copy of AHA's letter to the Atlanta Field Office describing its RHF Plan. AHA submitted this letter to the Field Office with a copy to OCI on April 24, 2007.

- The use of RHF funds will be identified in Exhibit F1 Sources and Uses for each phase prior to obligation in conjunction with the closing of each phase. Funds required prior to closing for predevelopment costs on projects identified in the accumulation will be requested from the local HUD office and AHA's MTW liaison, Eugene Geritz. F1s supporting this RHF plan will be submitted to you under separate cover.

- HUD staff agreed that for RHF grants awarded in FFY08 and later, AHA has the option to accumulate up to five years of RHF first or second increment awards in a similar manner, provided that the one to five year accumulation period for either or both increments begins in a year when a new tier has been added to that increment in that fiscal year. Both OPHI and AHA anticipate that there will be a new tier added to each increment every year in the foreseeable future.

- Based on a conversation between Rick Smith and Ken Sadeckas on April 24th, it was agreed that for any year that no new tier is added to an increment and it is not part of a previous accumulation, OPHI will work with AHA to optimize the use of that increment.

- AHA's Annual CATALYST MTW Report will address the use of Replacement Housing Factor funds in the context of AHA's revitalization program and will refer to the RHF plan for details.

Use of Replacement Housing Factor grants, Fiscal Years 2003-2007
May 15, 2007
Page 3

- Although all increments identified in the attached RHF plan have the same Obligation and Expenditure End Dates, each annual increment award must be at least 90% obligated by its Obligation End Date. OPHI agreed that, should the situation arise that the sequence of actual use of the grants causes some awards to be 100% obligated, but others to fall below 90%, OPHI will work with AHA to funge the expenditures to allow all awards to meet the 90% standard.

Please contact me at 404-817-7250 or Ken Sadeckas at 404-817-7350 if you have any questions.

Sincerely,

[ORIGINAL SIGNED]
Stephen D. Nolan
Chief Financial Officer

Enclosures

cc: Susan Wilson
Gene Geritz
Jennifer Powers
Richard Smith
Renée Lewis Glover
Joy Fitzgerald

THE HOUSING AUTHORITY OF THE CITY OF ATLANTA, GEORGIA (AHA)
MTW AGREEMENT
PROJECT BASED RENTAL ASSISTANCE - DEVELOPER SELECTION PROTOCOL

The Housing Authority of the City of Atlanta, Georgia ("AHA") and the United States Department of Housing and Urban Development ("HUD") are parties to an Amended and Restated Moving to Work Agreement, dated as of November 13, 2008, as amended by that certain Second Amendment to the Moving to Work Agreement, effective as of January 16, 2009 (the "MTW Agreement"). Using its MTW flexibility, AHA will use an alternate process for selecting developers for the project based rental assistance program.

MTW Agreement Reference

Section VII.B of Attachment D of AHA's MTW Agreement authorizes AHA to develop and adopt a reasonable policy and process for providing Section 8 project-based rental assistance during the term of AHA's MTW Agreement; this includes the establishment of a reasonable competitive process for selection of developers. AHA is also authorized to exempt itself or development sponsors from the need to participate in a competitive process to provide project-based rental assistance at a community where (i) AHA has a direct or indirect ownership interest in the entity that owns the community; (ii) AHA owns the land on which the community has been or is to be developed; or (iii) AHA is funding a portion of the construction costs of the community and subsidizing the operating costs or rents of the community for low-income families. Project Based Rental Assistance as a Development Tool has been included in AHA's Annual MTW Plans for FY 2006, FY 2007 and FY 2008.

AHA Process for Project Based Rental Assistance Developer Selection

AHA will continue to utilize Project Based Rental Assistance (PBRA) as a development tool with the goals of (a) facilitating housing opportunities for families in healthy mixed income communities; (b) facilitating the development of housing for the elderly, including independent living and assisted living; (c) facilitating the development of supportive services housing for disabled persons and other transitional housing; and, (d) expanding housing opportunities in areas of low poverty. In order to create greater housing opportunities in mixed-income communities for very low income families, AHA will provide PBRA in support of the Low Income Housing Tax Credit ("LIHTC") applications under the annual Qualified Allocation Plan ("QAP") for the State of Georgia. AHA will also use PBRA to support projects financed with tax exempt bonds. Proposals will also be solicited under the AHA PBRA Homeless and Mental Health Demonstration Programs.

Projects Financed with Tax Exempt Bonds – Once each year, AHA will utilize a "Request for Proposal" (RFP) process as defined in the AHA's procurement policies to provide the specific project requirements and project selection criteria for projects that will be financed with tax exempt bonds (with or without 4% Low Income Housing Tax Credits) which are seeking PBRA. Since bond allocations may be received by developers from the State throughout the year responses to these RFPs may be received at any time for one year from the time the RFP was issued.

Projects Financed with 9% Low Income Housing Tax Credits – Upon issuance of the QAP for Low Income Housing Tax Credits, AHA will utilize a "RFP process as defined in the AHA's procurement policies to provide the project requirements and selection criteria for projects to be financed with Low Income Housing Tax Credits. PBRA proposals for projects to be financed with 9% LIHTC's will have a specific due date to enable review and selection prior to the required submission deadline for the LIHTC application.

Demonstration Programs - AHA will utilize an RFP process as defined in AHA's procurement policies for designated demonstration programs developed under the PBRA initiative. These demonstration programs include the Homeless Demonstration, the Mental Health Demonstration and any other future demonstration programs that may be developed to support populations with special needs. The demonstration programs utilize distinct criteria for award of PBRA and such criteria may vary for each solicitation pursuant to the partnership agreements through which these programs provide the required supportive services for the special needs populations they serve.

Site and Neighborhood Standards – All sites proposed in response to any of the above identified request for PBRA proposals may be located in AHA's jurisdiction or in adjacent jurisdictions (if there is separate intergovernmental agreement with housing authorities in those jurisdictions allowing AHA to operate in those jurisdictions) within the following types of urban areas: (i) an area of revitalization that has been designated as such by the City of Atlanta; (ii) an area where public housing units were previously constructed and were demolished; (iii) a racially or economically impacted area where AHA plans to preserve existing affordable housing; (iv) in connection with a HOPE VI or other HUD funded master planned development; and (v) sites located in a non-impacted or racially mixed census tract that otherwise meets HUD's Site and Neighborhood Standards.

Selection and Approval – A PBRA Project Evaluation Committee will be appointed by the Senior Vice President (SVP) of Real Estate Development and Acquisitions (REDA) who will be responsible for evaluating and scoring all project proposals in accordance with published selection criteria. The PBRA Evaluation Committee will include representatives from Asset Management and other AHA Divisions as determined by the SVP of REDA. Upon completion of evaluations, the committee will forward projects

recommended for approval to the AHA Board of Commissioners.

Noncompetitive Process – AHA, using its best business judgment, may decide to provide project-based rental assistance to a community where (i) AHA has a direct or indirect ownership interest in the entity that owns the community; (ii) AHA owns the land on which the community has been or is to be developed; or (iii) AHA is funding a portion of the construction costs of the community and subsidizing the operating costs or rents of the community for low-income families without the need to engage in a competitive process. These projects must still meet AHA's site and neighborhood standards, subsidy layering review, accessibility, Davis Bacon and HUD environmental requirements.

HUD Review

This new protocol was reviewed by Eugene Geritz, AHA's HUD-appointed MTW liaison, as a step in the approval process prior to including the new protocol in AHA's response to HUD's FY 2008 MTW Annual Plan Conditional/Partial Approval letter dated August 20, 2007 and FY 2009 CATALYST Implementation Plan. Protocol is pending HUD's final approval.

Appendix O – MTW Implementation Protocols

THE HOUSING AUTHORITY OF THE CITY OF ATLANTA, GEORGIA (AHA)
MTW AGREEMENT
HUD FUNDING AVAILABILITY PROTOCOL
November 9, 2007

The Housing Authority of the City of Atlanta, Georgia ("AHA") and the United States Department of Housing and Urban Development ("HUD") are parties to an Amended and Restated Moving to Work Agreement, dated as of November 13, 2008, as amended by that certain Second Amendment to the Moving to Work Agreement, effective as of January 16, 2009 (the "MTW Agreement"). Consistent with the statutory and regulatory flexibility provided under AHA's MTW Agreement, AHA is using a methodology for determining the total number of eligible low-income families assisted during the MTW Demonstration Period as an approach in addressing the volatility in the availability of HUD funding to assist families.

MTW Agreement Reference

In accordance with the provisions of Sections I.I, III.A, V.A of Attachment D of AHA's MTW Agreement, AHA has the flexibility to pursue locally driven policies, procedures and programs to develop more efficient ways of providing housing assistance to low- and very-low income families; to expand, improve and diversify AHA's portfolio and to provide flexibility in the design and administration of housing assistance to eligible families while reducing costs and achieving greater cost effectiveness.

HUD Funding Availability Protocol

Section II.D of AHA's MTW Agreement provides, in part, that "The Agency… shall (ii) assist substantially the same total number of eligible low-income families under MTW as would have been served absent the demonstration, and (iii) maintain a comparable mix of families by family size, as would have been served or assisted had the amounts not been used under the demonstration." Although AHA fully intends to effectively serve as many low-income eligible families as feasible under its MTW demonstration program, AHA recognizes that its ability to provide subsidy to families is dependent upon the amount of subsidy AHA receives from HUD. Any substantial decreases in funding from HUD would have a negative impact on AHA's ability to serve the same number of families.

Appendix O – MTW Implementation Protocols

In order to facilitate the development or preservation of affordable housing, AHA has been provided the flexibility to invest MTW Funds (as defined in the MTW Agreement) into mixed-income, mixed-finance developments, owned by private developers, serving low-income families (households who earn 80% or less of the metropolitan area median income ("AMI").

For purposes of counting the total number of eligible low-income families assisted or served by AHA during the term of the MTW Agreement, AHA will include in its tabulation:

1. Households earning 80% and below of AMI who reside in:

   (a) AHA-sponsored mixed-income multi-family rental communities;

   (b) AHA-owned public housing communities;

   (c) Mixed-finance/ Mixed-income multi-family rental communities owned by private owners where AHA is providing Project Based Rental Assistance (PBRA) and/or has made a capital investment to support the development or preservation of affordable housing for low-income families (households who earn 80% or less of AMI); and

   (d) Other PBRA communities owned by private owners where AHA's only participation is through the PBRA initiative.

2. Families participating in the housing choice voucher program.

This approach will allow AHA the greatest opportunity, to the extent that funding for these housing opportunities are not substantially cut or reduced by HUD, to (1) count eligible low-income families assisted under various subsidy programs; (2) mitigates the risk of AHA being adversely affected in the number of families served due to HUD funding reductions; and (3) allows AHA to comply with provisions of the MTW Agreement regarding the number of families served while allowing AHA to take advantage of the flexibility offered under MTW on how housing assistance is provided to low-income families.

HUD Review

This new protocol was reviewed by Eugene Geritz, AHA's HUD-appointed MTW liaison, as a step in the approval process prior to including the new protocol in AHA's response to HUD's FY 2008 MTW Annual Plan Conditional/Partial Approval letter dated August 20, 2007. Although this Protocol was included in AHA's HUD-approved FY 2008 CATALYST Implementation Plan, Mr. Geritz advised AHA that unless otherwise notified by HUD the approval of protocols are documented outside of the annual plan review.

THE HOUSING AUTHORITY OF THE CITY OF ATLANTA, GEORGIA
MTW AGREEMENT
PROJECT BASED RENTAL ASSISTANCE
SUBSIDY LAYERING REVIEW PROTOCOL
February 18, 2009

The Housing Authority of the City of Atlanta, Georgia (AHA) and the United States Department of Housing and Urban Development (HUD) are parties to a Moving to Work Demonstration Agreement (MTW Agreement), effective July 1, 2003. Consistent with its MTW Agreement authorizations, AHA can establish its own project based rental assistance subsidy layering review process for residential properties owned by private entities who are seeking Project Based Rental Assistance (PBRA) from AHA.

MTW AGREEMENT REFERENCE

In accordance with the provisions of AHA's Amended and Restated MTW Agreement, Attachment D, Section VII. B. 10, "AHA shall be authorized to perform subsidy layering reviews for Section 8 project-based rental assistance properties; provided, however, that AHA shall identify and engage in independent third party to do the subsidy layering review where AHA is the direct or indirect owner of the property."

HUD REGULATORY REQUIREMENTS

HUD regulations at 24 CFR § 983.55 (a) states: "The PHA may provide PBV assistance only in accordance with HUD subsidy layering regulations (24 CFR 4.13) and other requirements. The subsidy layering review is intended to prevent excessive public assistance for the housing by combining (layering) housing assistance payment subsidy under the project based voucher program with other governmental housing assistance from federal, state, or local agencies, including assistance such as tax concessions or tax credits." Further, HUD regulations at 24 CFR §983.55 (b) states "The PHA may not enter an Agreement or HAP contract until HUD or an independent entity approved by HUD has conducted any required subsidy layering review and determined that the PBV assistance is in accordance with HUD subsidy layering review requirements."

In accordance with the terms of AHA's MTW Agreement, as amended, AHA is authorized to perform subsidy layering reviews during its MTW demonstration period. This Project Based Rental Assistance (PBRA) Subsidy Layering Review Protocol will serve to implement the regulatory relief granted by HUD to

AHA through its MTW Agreement.

AHA IMPLEMENTATION FOR SUBSIDY LAYERING REVIEW AND APPROVAL

As part of the subsidy layering review and approval, AHA shall follow the process as set forth below:

1. AHA will conduct the subsidy layering review of PBRA proposals for which it is not or will not be a direct or indirect owner of the property. AHA, in its discretion, may use an independent third party consultant to conduct subsidy layering reviews for all proposed PBRA assisted properties including those proposals, as required, where AHA has an interest. AHA will retain an independent third party consultant who has the requisite knowledge, experience and credentials to conduct such reviews. The independent third party consultant must be an established investment and financial consulting firm with at least 10 years experience with a minimum of 3 years experience in conducting subsidy layering or similar reviews and underwriting and/or packaging HUD and tax credit-related multifamily financing for developers and/or housing agencies with a total loan closing value in excess of $250 million and a production level of 1,500 units. At the present time, AHA has engaged the services of Duvernay + Brooks LLC to conduct subsidy layering reviews. The firm's credentials are presented in Exhibit I of this Protocol.
2. AHA staff or the independent third party consultant, as applicable or required, will conduct the subsidy layering review using the following analysis:
   a. Sources and Uses review. AHA reviews the project's PBRA application sources and uses, including the line item development budget. AHA reviews documentation of all public and private funding sources to determine that all funding sources have been documented. AHA also determines whether the development cost estimates are reasonable in comparison with similar projects in AHA's portfolio of mixed income new construction developments. AHA reviews contractor and developer fees to insure they meet HUD and Georgia Department of Community Affairs guidelines.

   b. Operating Proforma and Leveraging Review. AHA reviews the project's unit mix and rent schedule, operating budget and 30-year proforma to insure that income and expense projections are reasonable in comparison with similar projects in AHA's portfolio of mixed income new construction developments. AHA reviews the project's debt coverage ratio in the first full year of operations to insure it meets DCA minimum and maximum ratio standards, and debt coverage projections for the term of the first mortgage. AHA's review is intended to insure that the project is financially feasible; and to insure that the project has sufficient private

leverage so that that net cash flow to the applicant and the amount of the federal development assistance being requested is not excessive.

c. Syndication Price Review. AHA calculates the tax credit equity syndication rate, net of syndication and tax credit agency-related costs, for the federal and combined federal and state low income housing tax credits that the project is projected to receive. AHA's review is intended to insure that the project is receiving the appropriate amount of tax credit equity based on competitive syndication rates.

d. Funding Gap Analysis. Based on the review of the project's sources and uses, development and operating budgets, operating proforma and syndication rates, AHA determines that the project has a funding gap requiring the requested amount of federal development assistance.

e. Commitment of Federal Assistance. AHA requires applicant to provide a formal commitment concerning any governmental assistance provided or to be provided to a project, including any governmental assistance that the applicant may pursue.

3. Conditioned upon the analysis and recommendations by AHA staff or the independent third party consultant, AHA will develop and maintain a Subsidy Layering Certification of Compliance as provided in Exhibit II of this protocol. This certification documents the properties compliance with HUD's subsidy layering requirements and AHA's acceptance of the property's further consideration for participation in AHA's PBRA program.

Appendix O – MTW Implementation Protocols

HUD Review

In an e-mail communication sent on December 15, 2004 by Joann Teiken of HUD to Althea Broughton of AHA, HUD confirmed that AHA may conduct its own subsidy layering reviews for PBRA proposals. Ms. Teiken wrote that HUD's analysis of AHA's MTW Agreement indicated that AHA is authorized to perform its own PBRA subsidy layering review in accordance with HUD policies and regulations. In a letter to Ivan Pour, HUD's MTW Team Leader, dated November 9, 2007 from Renée Lewis Glover, AHA's President and CEO, Ms. Glover confirmed her phone conversation with Mr. Pour regarding HUD guidance to MTW agencies in which she clarified that such HUD guidance to MTW agencies on various matters is non-binding and is being provided by HUD for technical assistance only and that based on such non-binding guidance, AHA will proceed with its business processes, without obligation to conform AHA's business processes to HUD's guidance, in accordance with guidance included in AHA's MTW Agreement, Plans and Implementation Protocols while reviewing HUD guidance with the sole intent of strengthening AHA's business processes to the extent AHA deems necessary and appropriate.

EXHIBIT I – Profile of Third-Party Consultant

Introduction

Duvernay + Brooks LLC (D+B) is a consultant to public- and private-sector developers of affordable housing, as well as a developer on urban revitalization and affordable housing developments throughout the United States. Since the firm's founding in 1999, D+B has built an outstanding national reputation for financial, policy, and development consulting, specializing in public housing mixed finance revitalization. D+B has assisted housing authority clients and development partners in the creation or revitalization of thousands of units of affordable housing, from small developments to city-wide portfolios. D+B's New York City location gives its staff easy access to clients throughout the country.

Joni Brooks, Duvernay + Brooks' Managing Member, is the firm's sole owner. Ms. Brooks has worked in the field of affordable housing for more than 25 years, serving as an executive in state housing agencies, as a developer of affordable housing, and as a consultant to a wide range of public- and private-sector clients. D+B was originally founded by Ms. Brooks and the late Terrence R. Duvernay, and today the firm carries on the legacy of Mr. Duvernay, who over his career served as executive director of the Georgia and Michigan state housing finance agencies and as Chief of Staff (1978–1981) and Deputy Secretary (1993–1994) of the U.S. Department of Housing and Urban Development.

Qualifications and Experience

Transaction-Oriented Approach

Duvernay + Brooks' consulting approach is transaction-oriented. D+B has been involved in the closing of more than 70 residential and mixed-use developments in the last eight years, each of which utilized multiple sources of public and private financing. Comprising over 7,000 rental and homeownership units, these closings have totaled over $1.2 billion. Duvernay + Brooks' services include:

- Planning public housing revitalization programs, including the acquisition, rehabilitation, and new construction of senior and family rental and homeownership units, community facilities and commercial space; land acquisition and neighborhood-wide revitalizations.
- Analyzing the applicability of government regulations in the use and structure of public subsidy funds, particularly in combination with tax-exempt bonds and low income housing and historic tax credit equity.
- Preparing financial projections and applying for and securing a wide range of public and private financing, including local and state government financing, HUD HOPE VI funds, low income housing and historic tax credits, tax-exempt bond volume cap, capital grant

anticipation bonds, FHA-insured conventional debt, HOME funds, CDBG and Section 108 funds, AHP funds, and tax increment financing.

- Performing feasibility analyses, including reviewing overall revitalization plans, evaluating projected sources and uses, development costs and income and expenses for entire revitalizations and individual components, and structuring mixed-finance transactions for both new construction and acquisition/rehabilitations
- Developing and maintaining computer models that are essential tools for developing financial structures and implementing projects, including sources and uses and proformas for each individual component or phase and the overall revitalization.
- Structuring and helping to procure debt (conventional and private activity and governmental purpose tax exempt bond financing) and equity for a wide range of projects, including new construction as well as the rehabilitation and refinancing of existing developments. D+B is one of the few financial advisory firms to have been involved in a public housing authority grant anticipation bond transactions from inception to closing.
- Assisting in the creation of public/private partnerships to implement complex revitalization initiatives, advising on negotiating the business and financial terms of the relationships between public and private sector development partners, public and private sector lenders and equity providers.
- Providing technical expertise on the drafting and review of financing and partnerships documents and assisting clients in closing transactions.
- Advising on repositioning and restructuring of real estate portfolios.

In each engagement, we draw on our extensive experience to develop customized strategies that reflect the best practices, while also responding to the client's unique needs, the project's unique characteristics, and the economic, political and regulatory environment in that particular locality.

Affordable Housing Finance and Public Housing Redevelopment

Duvernay + Brooks has unsurpassed experience in financial structuring and analysis for public housing mixed finance transactions. D+B's work on public housing revitalizations has spanned the entire gamut of project activities from initial vision/conception to closing, from construction through lease-up. D+B has also worked with both large and small public housing authorities on every sort of development program:

- The rehabilitation of existing public housing stock.
- The demolition and new construction of conventional public housing and on-site mixed-income/finance projects.
- The development of mixed-income/finance off-site replacement housing; acquisition and rehabilitation projects.
- Homeownership projects, and projects with commercial components.

Appendix O – MTW Implementation Protocols

D+B has extensive experience both with housing authorities acting as their own developer and with housing authorities working in partnership with private developers. D+B is currently working with housing authorities on more than twenty public housing revitalizations.

Appendix O – MTW Implementation Protocols

EXHIBIT II

Capital Contribution with HOME Funds and PBRA Operating Subsidy

ATLANTA HOUSING AUTHORITY
HOUSING CHOICE VOUCHER PROGRAM PROJECT BASED ASSISTANCE

CERTIFICATION OF COMPLIANCE
SUBSIDY LAYERING

Property Address:

I hereby certify that the above property has been reviewed for compliance with the Subsidy Layering requirements adopted by the Atlanta Housing Authority in accordance with the provisions of the Moving To Work Demonstration Program Agreement with the U.S. Department of Housing and Urban Development (HUD) effective July 1, 2003, as amended.

The Subsidy Layering analysis provides documentation of compliance and acceptability of the property for participation in AHA's Project Based Rental Assistance Program. However, subsidy layering alone does not mean that project based rental assistance will be awarded. The project must also meet AHA's site and neighborhood standards, HUD's environmental standards and all other AHA program requirements. Based on the outcome of these additional reviews, PBRA will be awarded.

The federal sources of the development funding are AHA capital contributions for which the analysis included the subsidy layering analysis. The federal sources of development also include HOME funding and such analysis was performed by the agency providing such funding based on criteria established for such review.

The federal sources of the development funding are AHA capital contributions for which analysis include the subsidy layering analysis.

The only source of operating subsidy attributable to the Project Based Assistance units is Section 8 housing assistance payments. No other operating subsidy will be paid on the PBA units. However, the project also receives operating subsidy for ***** PHA units which are operated on a breakeven basis; therefore, no excess subsidy is derived by the project.

Appendix O – MTW Implementation Protocols

Signed this ____day of _____ , 200_

BY:_____

TITLE:_____

SIGNATURE:_____

Statement of Corporate Policies
Governing the Leasing and Residency of Assisted Apartments

Adopted by the Board of Commissioners
June 16, 2004

Revision 4

Amended by the Board of Commissioners
April 30, 2008

The Housing Authority of the City of Atlanta, Georgia

Statement of Corporate Policies Governing the Leasing and Residency of Assisted Apartments
Revision 4 [1]

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[1] The *Statement of Corporate Policies Governing the Leasing and Residency of Assisted Apartments* (Statement of Corporate Policies) was originally adopted by the Board of Commissioners on June 16, 2004. The Board of Commissioners adopted amendments to the Statement of Corporate Policies on April 25, 2005, September 9, 2005, December 12, 2005 and April 25, 2007. The current Revision 4 is based on amendments adopted by the Board of Commissioners on April 30, 2008.

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The Housing Authority of the City of Atlanta, Georgia

Statement of Corporate Policies
Governing the Leasing and Residency of Assisted Apartments

PREAMBLE

This *Statement of Corporate Policies Governing the Leasing and Residency of Assisted Apartments* ("Statement of Corporate Policies") is the policy document that governs the leasing and residency of public housing-assisted apartments owned, affiliated, or sponsored by The Housing Authority of the City of Atlanta, Georgia ("Atlanta Housing Authority"). The Statement of Corporate Policies is organized around Atlanta Housing Authority's guiding principles and its corporate vision, Healthy Mixed-Income Communities.

For purposes of the Statement of Corporate Policies, any apartment that receives public housing operating subsidy, regardless of the ownership structure of the community in which the apartment is located, is referred to as an "Assisted Apartment." Atlanta Housing Authority-owned public housing developments with Assisted Apartments are referred to as "Affordable Communities." Privately-owned market rate, mixed income communities with a percentage of Assisted Apartments are referred to as "Signature Communities" or "Mixed-Income, Mixed-Finance Communities." These communities are owned by a limited partnership or similar ownership structure ("Owner Entity"); are sponsored and/or developed, in part, by Atlanta Housing Authority, who may or may not have a ground lease on the real estate; and are independently operated by the Owner Entity's managing general partner and professional management company.

Atlanta Housing Authority and the U.S. Department of Housing and Urban Development (HUD) entered into the Amended and Restated Moving to Work Agreement, effective as of November 13, 2008, as further amended by that certain Second Amendment to the Moving to Work Agreement, effective as of January 16, 2009, as may be amended or extended from time to time ("MTW Agreement"). As a result of the statutory and regulatory relief provided to Atlanta Housing Authority under the MTW Agreement, the Statement of Corporate Policies outlines policies that support the creative design and implementation of initiatives to enhance the quality of life of residents, promote resident economic and lifestyle independence and foster the development of excellent, mixed-income communities.

The Statement of Corporate Policies was adopted by Atlanta Housing Authority's Board of Commissioners on June 16, 2004. Three revisions of the Statement of Corporate Policies have been approved subsequent to the original date of adoption. This is the fourth revision of these policies.

Administrative procedures, processes, protocols, and management practices for any policy, initiative, or approach shall be developed following the intent of the Statement of Corporate Policies and may be amended from time to time at the discretion of Atlanta Housing Authority.

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PART I- INTRODUCTION

ARTICLE ONE. OBJECTIVE

The Statement of Corporate Policies is Atlanta Housing Authority's policy document for the leasing and occupancy of Assisted Apartments in support of Atlanta Housing Authority's Vision of Healthy Mixed-Income Communities.

ARTICLE TWO. MANAGEMENT AND ADMINISTRATION

1. The Operations Division is responsible for developing and implementing written operating procedures for the Affordable Communities that are consistent with the Statement of Corporate Policies.

2. Owner Entities and their professional private-sector management companies are responsible for developing and implementing written operating procedures for the Signature Communities that are consistent with the Statement of Corporate Policies and to the requirements of other funding sources to the extent that Signature Communities may be subject to stricter requirements. Such operating procedures are subject to review by Atlanta Housing Authority in coordination with the oversight procedures of other funding sources in order to ensure consistency with the intent of all policies and requirements.

3. For the purposes of the Statement of Corporate Policies the written operating procedures under Sections 1 and 2 above are referred to as Management Operating Procedures.

4. For the purposes of the Statement of Corporate Policies, Atlanta Housing Authority and Owner Entity private management companies, collectively or individually, as appropriate, will be referred to as "Management Agent.")

ARTICLE THREE. MOVING TO WORK ANNUAL PLAN

1. As a Moving to Work agency, Atlanta Housing Authority will establish, implement and evaluate innovative cost-effective affordable housing strategies for Assisted Apartments that are designed to improve operational efficiencies and help low income families achieve greater economic independence.

2. While recognizing that implementation of various policy initiatives may be immediate, progressive, or refined through various activities and demonstration programs, the implementation of those strategic initiatives, not immediately enumerated in Atlanta Housing Authority's Moving to Work (MTW) Annual Plan, may be advanced, provided such strategic initiatives are consistent with the Statement of Corporate Policies and the spirit and intent of the authorizations under the MTW Agreement.

ARTICLE FOUR. APPLICABILITY OF POLICIES TO APPLICANTS AND RESIDENTS

The Statement of Corporate Policies applies to all Applicants, Residents, and members of Applicant and Resident households, including the heads of household, with respect to their compliance with all policies related to their application for and residency of an Assisted Apartment. The singular use of the terms "Resident" and "Applicant" shall be deemed to include all household members for the purposes of this Statement of Corporate Policies.

ARTICLE FIVE. SITE-BASED WAITING LIST POLICY

The Site-Based Waiting List Policy established the equitable and consistent administration of independent site-based waiting lists at each AHA-owned Affordable Community and each Signature Community. This policy provides for the fair and equitable selection of eligible and qualified Applicants from a community waiting list rather than from a centralized pool. Although an Applicant can only lease one Assisted Apartment, Applicants have the freedom to submit applications to the site-based waiting list of the community or communities of their choice, provided the site-based waiting list is open and receiving applications.

HUD's Assistant Secretary of Fair Housing and Equal Opportunity approved Atlanta Housing Authority's Site-Based Waiting List Policy for the Olympic Legacy Program by letter dated June 28, 1996. The Mixed-Income, Mixed-Finance Community Site-Based Waiting List Policy Addendum to the Olympic Legacy Program was approved on June 25, 1999. The Affordable Housing Community Site-Based Waiting List Policy was adopted by Atlanta Housing Authority's Board of Commissioners on January 30, 2002. The implementing protocols for the Site-Based Waiting List Policy are memorialized as separate policy documents and are hereby included, by reference, in this Statement of Corporate Polices.

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ARTICLE SIX. FAIR HOUSING AND EQUAL OPPORTUNITY

1. Atlanta Housing Authority supports all applicable Federal and State nondiscrimination and fair housing laws and applicable HUD regulations in all housing and program activities. Atlanta Housing Authority monitors fair housing and equal opportunity compliance at all of the communities governed by this Statement of Corporate Policies.

2. Atlanta Housing Authority acknowledges the protections afforded victims under the *Violence Against Women Act*, and has included administrative measures to address those protections in its Management Operating Procedures, as applicable.

3. Atlanta Housing Authority acknowledges the importance of serving Limited English Proficiency (LEP) persons. The extent to which it is determined that a significant number or proportion of the population residing in an Affordable Community is comprised of LEP persons, Atlanta Housing Authority will develop and implement a LEP Plan to address the needs of such persons, as appropriate and in consideration of the cost and availability of resources that would be needed to provide translation services to LEP persons.

ARTICLE SEVEN. REASONABLE ACCOMMODATION

1. Atlanta Housing Authority shall assist persons with disabilities who are Applicants, Residents, employees and visitors to Atlanta Housing Authority offices and communities to participate in programs on the same basis as persons who do not have such disabilities. Atlanta Housing Authority will make reasonable and necessary accommodations for persons with disabilities so that each such person may participate in a meaningful manner, and benefit from, all Atlanta Housing Authority-sponsored programs and activities. These reasonable accommodations shall extend to Atlanta Housing Authority's applications procedures, program participation and facilities enhancement activities.

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2. Atlanta Housing Authority and Owner Entities through their respective Management Agents shall (i) set forth a process for Applicants, Residents and members of the public who participate in programs in Affordable Communities and/or Signature Communities to request reasonable accommodations; (ii) provide forms for individuals to request reasonable accommodation(s); (iii) set forth specific procedures regarding the acceptance, processing and disposition of reasonable accommodation request(s), including timeframes; and (iv) provide formal appeal/grievance procedures for individuals who have been denied reasonable accommodation(s).

3. As a component of Atlanta Housing Authority's reasonable accommodation efforts, Atlanta Housing Authority will advise Applicants, Residents, employees and members of the public of the right to effective communication in programs, services and activities. Management Operating Procedures will ensure that:

   A. Interested persons, including persons with hearing, visual or cognitive disabilities, can obtain information concerning the existence and location of accessible services, activities, and facilities;

   B. Atlanta Housing Authority, Owner Entities, or Management Agents shall furnish appropriate auxiliary aids and services, where necessary, to afford a person with disabilities an equal opportunity to participate in programs, services and activities. In determining what auxiliary aids are necessary, Atlanta Housing Authority, Owner Entities, or Management Agents shall give primary consideration to the requests of the person with disabilities unless doing so would result in a fundamental alteration of programs or activities, or an undue financial and administrative burden; and

   C. Residents and Applicants are aware of alternative, non-written methods to request a reasonable accommodation and the availability of forms and information in alternative formats.

ARTICLE EIGHT. DECONCENTRATION OF POVERTY

1. In order to realize its corporate vision of Healthy Mixed-Income Communities, Atlanta Housing Authority is pledged to outcomes that lead to the deconcentration of poverty in the management of its Affordable Communities and the creation of market rate, mixed income communities.

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2. Atlanta Housing Authority's fair and equitable Site-Based Waiting List Policy for Assisted Apartments at each Affordable and Signature Community strengthens the concepts of community building and housing choice. Based on available housing opportunities, Applicants choose communities according to location, amenities, job opportunities, schools, and neighborhoods. The result is a policy approach that supports the deconcentration of poverty.
3. Under Moving to Work, Atlanta Housing Authority has the authority to pursue locally driven policies, procedures and programs with the aim of developing better, more efficient and effective ways of providing quality, mixed-income housing to low income families
4. Atlanta Housing Authority will also continue to reposition its portfolio of distressed and obsolete public housing developments through a variety of strategies, foremost of which is the transformation of its conventional public housing developments into market-rate, mixed-income communities, each with a seamless affordable component and households having a range of incomes and diverse backgrounds.

ARTICLE NINE. FRAUD AND MISREPRESENTATION

1. Applicants and Residents are required to provide truthful, complete information relating to participation in other housing subsidy programs, income from all sources, household composition, and all household background information to qualify for initial eligibility and continued residency in an Assisted Apartment.
2. Applicants and Residents who engage in acts of fraud and misrepresentation are subject to prosecution under State and Federal laws, and where appropriate, will be referred for such prosecution by Atlanta Housing Authority.
3. Any Applicant or Resident who has made any intentional misrepresentation at the time of admission, during any subsequent Lease Renewal Review, or at any other time shall be denied admission or be subject to termination or non-renewal of tenancy, as applicable.
4. Applicants who are denied admission due to intentional misrepresentation of his/her criminal history shall have the right to an informal review as set forth in the Statement of Corporate Policies.

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ARTICLE TEN. PRIVATE SECTOR INNOVATION

In order to take advantage of private sector innovation, Atlanta Housing Authority may make available to the Owner Entities of Signature Communities the least restrictive regulatory requirements to achieve goals in accordance with the MTW Annual Plan. Owner Entities may engage in innovative activities in developing and implementing management practices and streamlined processes; higher community standards; and quality of life initiatives in order to create quality living environments.

1. Owner Entities are authorized, subject to the approval of the Atlanta Housing Authority, to create, adopt and implement their own occupancy, leasing and rent policies for public housing-assisted Residents and eligible Applicants with respect to their communities.

2. Innovative policies and procedures could include, but are not limited to, new rent structures such as affordable fixed rents; standard deductions; application and waiting list procedures; eligibility and/or suitability criteria; meaningful economic independence milestones; and term limits.

3. Such innovative policies and procedures, once approved by Atlanta Housing Authority, will supplement and will not be considered in conflict with this Statement of Corporate Policies and Atlanta Housing Authority's requirements for Assisted Apartments.

PART II – APPLICANT AND RESIDENT SUITABILITY

ARTICLE ONE. DEFINITIONS OF FAMILY

1. A Family is defined as two or more persons who may or may not be related that are residing together in the same household.

2. An Elderly Family is defined as a Family in which the head-of-household, spouse, or sole adult member of the household is age 62 or older.

3. A Disabled Family is defined as a Family in which the head-of-household, spouse, or sole adult member of the household is a person with a verifiable disability.

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4. Any member of an Elderly Family or Disabled Family who is not elderly (62 years or older) or a person with a verifiable disability, other than an approved live-in-aide or a household member who is otherwise needed in the home as a reasonable accommodation to care for an elderly and/or disabled household member based on verifiable circumstances for a recognized period of time, must be in compliance with the qualifications outlined in Article Two and Article Four of this Part II.

ARTICLE TWO. DETERMINING CRITERIA

1. An Applicant desiring to lease an Assisted Apartment must first demonstrate that (a) Applicant meets one of the definitions of Family and is an eligible low income household based on total annual household income pursuant to and verified according to U. S. Department of Housing and Urban Development (HUD) rules and regulations and as provided in Atlanta Housing Authority's MTW Annual Plan; (b) Applicant satisfies HUD's statutory and regulatory requirements for citizenship/eligible immigrant status; (c) each school-age member of the Applicant's household who is under 18 years of age and who has not completed her/his secondary education may be required to enroll and attend an accredited public or private secondary academic or technical school (d) provided the Applicant household is not an Elderly Family or a Disabled Family as defined in Article One of this Part II, at least one adult member of the Applicant household, 18 years of age or older, is either legally and gainfully employed on a full-time basis for at least 30 hours per week or legally and gainfully self-employed in a legitimate business enterprise, appropriately documented, for at least 30 hours per week as defined by the Management Operating Procedures; (e) each other member of the Applicant's household, 18 years of age and older, including each other household member in an Elderly Family or Disabled Family, is either (1) legally and gainfully employed or self-employed (as described above) on a full-time basis for at least 30 hours per week; (2) a full-time student at an Atlanta Housing Authority recognized school or institution; (3) employed (but not self-employed) on a part-time basis and either attending an Atlanta Housing Authority recognized school or institution on a part-time basis or participating in an Atlanta Housing Authority-approved training program for a combined minimum total of 30 hours per week for employment and education/training;

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(4) elderly; or (5) disabled; and (f) Applicant would be a suitable Resident based on past satisfactory behavior including, but not limited to, housekeeping performance, acceptable payment records for rent and/or utilities (as applicable), acceptable credit history, acceptable criminal background record, and a commitment to abide by the Dwelling Lease offered to eligible Applicants (the "Lease").

2. A Resident of an Assisted Apartment must continue to demonstrate that the Resident is a suitable Resident based on satisfactory behavior as a renter including, but not limited to, housekeeping performance, good payment records for rent, other charges and utilities, satisfactory record of lease compliance, and an acceptable criminal background record.

3. All Applicants and Residents must certify at application, and Residents must certify at recertification, that they have the ability to comply with all requirements of the Lease, including, but not limited to, those which require the ability to exit the building in the event of an emergency and such other related certifications as deemed appropriate by Atlanta Housing Authority, without Atlanta Housing Authority having to provide services beyond those stated in the Lease. This responsibility applies to all Applicants and Residents, including those Applicants and Residents who may have physical or mental impairments that otherwise cannot be addressed by reasonable accommodations.

ARTICLE THREE. INITIAL LEASING CONSIDERATIONS

1. An Applicant desiring to lease an Assisted Apartment must apply at the community or communities of the Applicant's choice according to the Management Operating Procedures.

2. An Applicant who applies will be placed on the applicable site-based waiting list for the community or communities in accordance with the Applicant Selection Policies.

3. Certain communities with Assisted Apartments may require Applicants to pay an appropriate non-refundable leasing fee, which may be applied to the Applicant's security deposit, provided the Applicant is offered and accepts the offer of an Assisted Apartment.

4. Applicants will provide all information on all household members requested in the application for admission on the form in use by the Management Agent.

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5. The application for admission will give persons with disabilities the opportunity to (i) specify whether they need a unit with accessible features and describe the necessary accessibility features they require; (ii) specify if they require reasonable accommodation(s) in their housing and/or during the application process; and (iii) request a copy of Atlanta Housing Authority's Reasonable Accommodation Policy.

6. Application information for Applicants will include the name and contact information of the Management Agent for each community, and the name and contact information of Atlanta Housing Authority's Section 504/ADA Coordinator, including the TDD/TTY number or Georgia Relay Service telephone number.

ARTICLE FOUR. APPLICANT SELECTION POLICIES

Applicants for Assisted Apartments, whether located in Affordable Communities or Signature Communities, will be placed on the applicable site-based waiting list in accordance with the requirements as set forth in this Article Four.

1. Order of Applicant Selection for Communities where the Resident Population is comprised of Elderly, Almost-Elderly and/or Non-Elderly Disabled Residents:

   A. To be considered for a Community for Elderly, Almost-Elderly and/or Non-Elderly Disabled Residents, an Applicant must be a household whose head or spouse (if married) or sole member is:

      (i) Elderly (62 years of age or older);

      (ii) Almost Elderly (55-61 years of age); or

      (iii) Non-Elderly Disabled (a person less than 62 years of age with a disability).

      Applicants who do not qualify as outlined above are not eligible for admission.

   B. Atlanta Housing Authority pursuant to its MTW Annual Plan will strive to achieve an optimal balance of Elderly, Almost Elderly, and Non-Elderly Disabled Residents in senior communities that do not have a designation pursuant to paragraph C of this Section. The Management Agents of such communities shall be permitted to admit applicants from the waiting list at a ratio of *four (4) Elderly and Almost Elderly Applicants to one (1) Non-Elderly Disabled Applicant* in order to achieve the optimal balance.

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C. Atlanta Housing Authority in accordance with its Moving to Work Annual Plan may designate up to 100% of the Assisted Apartments in a community for Elderly, Almost Elderly, or Non-Elderly Disabled Residents, as applicable and appropriate.

D. In the event there is an insufficient number of Elderly and Almost Elderly Applicants to admit to Assisted Apartments pursuant to paragraphs B and C above, Atlanta Housing Authority may, in its sole discretion, exercise its authority to permit Elderly and/or Almost Elderly Applicants on the Housing Choice Program waiting list to be selected for screening and admission, if approved, to a senior community with Assisted Apartments.

E. To the extent that either a current Resident or eligible Applicant requires the accessibility features of an available Uniform Federal Accessibility Standards Unit ("UFAS-Accessible Unit"), the requirements in Article Five of this Part II will take precedence in the order of selection.

2. Order of Applicant Selection for a Community.

A. The order of selection of an Applicant from a site-based waiting list in a community with Assisted Apartments will be according to the ranking of the Applicant's application by either date-and-time of application or lottery, as applicable. To the extent that either a current Resident or eligible Applicant requires the accessibility features of an available Uniform Federal Accessibility Standards Unit ("UFAS-Accessible Unit"), the requirements in Article Five of this Part II will take precedence in the order of selection.

B. Provided the Applicant is <u>not</u> an Elderly Family or a Disabled Family as defined in Article One of this Part II, at least one adult member of the Applicant household, 18 years of age or older, must be either legally and gainfully employed on a full-time basis for at least 30 hours per week <u>or</u> legally and gainfully self-employed in a legitimate business enterprise, appropriately documented, for at least 30 hours per week as defined by the Management Operating Procedures; and all other members of the household, including such other household members in an Elderly Family or Disabled Family, must be either:

i. 18 to 61 years old and legally and gainfully employed or self-employed (as described above) on a full-time basis at least 30 hours per week;

ii. 18 to 61 and attending an Atlanta Housing Authority recognized school or institution as a full-time student;

iii. 18 to 61 years of age and engaged in a combination, totaling at least 30 hours per week, of legal employment (but not self employment), education (attending an Atlanta Housing Authority recognized school or institution) and/or participation in an Atlanta Housing Authority-approved training program ;

iv. Elderly; or

v. Disabled.

3. General Considerations for Applicant Selection from a Site-Based Waiting List.

A. To be eligible for selection, an Applicant's eligibility and qualifications must be verified through appropriate documentation as reasonably required by the Management Agent in the Management Operating Procedures.

B. An Applicant's placement on a site-based waiting list at an Affordable Community and/or Signature Community shall be based on either the date-and-time of application or a random method such as a lottery, as determined by the Management Agent in accordance with the Statement of Corporate Policies and the Management Operating Procedures. In either case, to the extent that either a current Resident or eligible Applicant requires the accessibility features of an available Uniform Federal Accessibility Standards Unit ("UFAS-Accessible Unit"), the requirements in Article Five of this Part II will take precedence in the order of selection.

C. The site-based waiting list will be opened following a public notice which will contain the following information:

i. Location of the Affordable or Signature Community where applications may be placed;

ii. Availability of Assisted Apartments by bedroom size;

iii. Explanation of basic eligibility criteria for Applicants; Special Qualifications, if any (e.g. work/program requirement);

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iv. Method of Selecting Applications (date and time of application, or by a random method such as a lottery);

v. Fair Housing Logo or statement; and

vi. Accessibility Logo or statement.

[6]

D. If the public notice does not include the closing date of the site-base waiting list then a separate public notice must be published to announce the closing date of the site-based waiting list.

E. The Management Agent will ensure that the opening and/or closing of a site-based waiting list will be published in selected newspapers of general public circulation, including minority and foreign language newspapers (for persons with LEP) that may be available to potential Applicants in order to ensure fair and equitable marketing efforts. The selection of such newspapers will be in accordance with the Management Operating Procedures and/or Affirmative Fair Housing Marketing Plan, as applicable.

F. The method used in ranking Applicants on the site-based waiting list for an Assisted Apartment determines the organization of applicants on the site-based waiting list. Applicants ranked by date-and-time of application will be organized according to bedroom size eligibility whereby the application with the earliest date-and-time will be first. Applicants ranked by lottery will be organized according to bedroom size eligibility in sequential numerical order, first to last, of the random selection. In the case of the reoccupancy of a revitalized community, eligible returning residents of the former public housing project will be placed on the applicable site-based waiting list and given first consideration as Applicants for an Assisted Apartment prior to any consideration given to other Applicants who were placed on the applicable site-based waiting list according to a public notice.

G. The maintenance of a site-based waiting list with respect to updating applications, notice letters, and purges will be detailed in the Management Operating Procedures.

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4. General Consideration for Mixed-Income, Mixed-Finance Communities

   A. At least five percent (5%) of all Assisted Apartments in Mixed-Income, Mixed-Finance Communities will be available to eligible and qualified Applicants and Residents with disabilities who require UFAS-Accessible Units, provided the Assisted Apartment unit count remains within the limits established by the governing legal and financial agreements should the percentage exceed five (5%).

   B. While still subject to the requirements of the Low Income Housing Tax Credit program under Section 42 of the federal Internal Revenue Code, and in consideration of the expected income levels of residents of apartments other than Assisted Apartments being contemplated by Owner Entities of Mixed Income Mixed Finance communities with Assisted Apartments, such Owner Entities are hereby permitted to manage admissions to an appropriate goal of a broad range of incomes whereby fifty percent (50%) of Assisted Apartments would be occupied by Resident families with incomes less than thirty percent (30%) of area Median Income for the Atlanta, Georgia MSA (adjusted for family size) and fifty percent (50%) by Resident families with incomes equal to or greater than thirty percent (30%) Median Income for the Atlanta, Georgia MSA (adjusted for family size).

ARTICLE FIVE. ORDER OF SELECTION FOR UFAS-ACCESSIBLE UNITS

1. Atlanta Housing Authority identifies and prioritizes the needs of eligible Residents and Applicants who require the accessibility features of a UFAS-Accessible Unit in a centralized database according to the date and time of a Resident's transfer request, or the date and time or ranking by lottery, as applicable, of an Applicant's application. This database ("UFAS-Accessible Unit Database") maintains data on such Residents and Applicants for both the Affordable Communities and Signature Communities.

2. Each Affordable Community and each Signature Community will maintain a separate, site-based UFAS-Accessible Unit Waiting List ("UFAS Waiting List") for eligible Applicants and Residents with disabilities who require UFAS-Accessible Units.

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3. The UFAS-Accessible Unit Database is established to provide:

   A. Direct assistance to Residents and Applicants with disabilities, upon request, in the application for an available UFAS-Accessible Unit in any Affordable Community or Signature Community;

   B. A process for notifying and referring residents from the database to the Affordable Communities and Signature Communities with openings on the respective site-based UFAS Waiting Lists;

   C. A process for notifying and referring Applicants from the database to the Affordable Communities and Signature Communities with openings on the respective site-based UFAS Waiting Lists; and

   D. A method for monitoring the maximization of occupancy of Assisted Apartments that are UFAS-Accessible Units, in Affordable Communities and Signature Communities, by Residents who require the accessibility features of those units.

4. When a UFAS-Accessible Unit becomes available in the appropriate bedroom size in an Affordable Community, the Management Agent shall offer the UFAS-Accessible Unit as follows:

   A. First, to a current Resident with disabilities in an Affordable Community who is being relocated due to Atlanta Housing Authority revitalization activities and who requires the accessibility features of the available UFAS-Accessible Unit;

   B. Second, to a current Resident with disabilities in the same Affordable Community who requires the accessibility features of the available UFAS-Accessible Unit and is occupying a unit without those features;

   C. Third, if there is no current Resident in the same Affordable Community who requires the accessibility features of the available UFAS-Accessible Unit and wishes to reside in that unit, then it will be offered to an eligible, qualified current Resident with disabilities, according to date and time of transfer request, residing in another Affordable Community, who requires the accessibility features of the available, UFAS-Accessible Unit and is occupying a unit without these features;

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D. Fourth, if there is no current Resident in any Affordable Community who requires the accessibility features of the vacant, UFAS-Accessible Unit and wishes to reside in that unit, then it will be offered to an eligible, qualified current Applicant with disabilities, according to date and time of application on the site-based waiting list of the same Affordable Community who requires the accessibility features of the available UFAS-Accessible Unit;

E. Fifth, if there is no qualified Applicant on the site-based waiting list of the same Affordable Community who requires the accessibility features of the vacant, UFAS-Accessible Unit, then it will be offered to an eligible, qualified Applicant with disabilities, according to date and time of application, on the site-based waiting list of another Affordable Community who requires the accessibility features of the available, UFAS-Accessible Unit; and

F. Sixth, if there is not an eligible, qualified Resident or Applicant with disabilities in the Affordable Communities who wishes to reside in the available, UFAS-Accessible Unit, then the unit may be offered to the next Applicant or Resident, according to the date and time of the transfer request or application, in the Affordable Community who does not need the accessibility features of the unit. The occupying Resident will sign a lease or lease addendum that requires the Resident of any UFAS-Accessible Unit in an Affordable Community who does not need the accessibility features of that unit to relocate, at no expense to the Resident, to a vacant, non-accessible unit within thirty (30) days of notice by the Affordable Community when there is an eligible, qualified current Applicant or Resident with disabilities who requires the accessibility features of the unit.

5. When an Assisted Apartment that is a UFAS-Accessible Unit becomes available in the appropriate bedroom size in a Signature Community, the Management Agent shall offer the UFAS-Accessible Unit to Residents and/or Applicants, as follows:

A. First, to a current Resident with disabilities in the same Signature Community who requires the accessibility features of the available, UFAS-Accessible unit and is occupying a unit without those features;

B. Second, if there is no current Resident in the same Signature Community who requires the accessibility features of the vacant, UFAS-Accessible Unit and wishes to reside in that unit, then it will be offered to an eligible, qualified current Applicant for an Assisted Apartment, according to date and time of application, on the site-based waiting list of the same Signature Community who requires the accessibility features of the available, UFAS-Accessible Unit;

C. Third, if there is no qualified Applicant for an Assisted Apartment on the site-based waiting list of the same Signature Community who requires the accessibility features of the vacant UFAS-Accessible Unit, then the Signature Community will coordinate with Atlanta Housing Authority's Section 504/ADA Coordinator for referrals from the Affordable and Signature UFAS-Accessible Unit Database. If Atlanta Housing Authority identifies a current Resident or Applicant on the Affordable and Signature UFAS-Accessible Unit Database, Atlanta Housing Authority shall refer the Resident or Applicant, according to date and time of transfer request or application, to the Signature Community; and

D. Fourth, if there is no eligible, qualified Resident or Applicant with disabilities in the Signature Community or referred by Atlanta Housing Authority pursuant to a review of the Affordable and Signature UFAS-Accessible Unit Database, who wishes to reside in the available, UFAS-Accessible Unit, then the unit may be offered to the next Applicant or Resident, according to date and time of transfer request or application, in the Signature Community who does not need the accessibility features of the unit. The occupying Resident will sign a lease or lease addendum that requires the Resident of any UFAS-Accessible Unit in a Signature Community who does not need the accessibility features of that unit to relocate, at no expense to the Resident, to a vacant, non-accessible unit within thirty (30) days of notice by the Signature Community when there is an eligible, qualified current Applicant or Resident with disabilities who requires the accessibility features of the unit.

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ARTICLE SIX. SCREENING OF APPLICANTS AND RESIDENTS

1. Applicants and Residents, at least 16 years of age or older, are subject to initial and ongoing screening to ensure that they can demonstrate their current and continued suitability as a Resident of a community with Assisted Apartments. The Management Agent shall be responsible for: (1) screening household members 16 years old and over; and (2) ensuring that all background information, including deductions and allowances, are properly verified.

2. Applicants shall undergo and complete the screening process prior to the offer of an Assisted Apartment. Residents shall undergo and complete the screening process annually, on an interim basis, or over some longer interval of time in accordance with the MTW Annual Plan.

3. Screening practices that are common and customary for the purpose of leasing apartments in the State of Georgia shall be utilized including, but not limited to examination of landlord and dispossessory records; review of past and current apartment management records; review of housekeeping performance based on a home visit; and requesting credit reports, utility records, and criminal background histories.

4. Applicants and Residents are required to execute authorization forms allowing the Management Agent to conduct any background check, examination, or verification required for appropriate determinations under the initial or periodic reexamination process. The period of the authorization will be established in the Management Operating Procedures.

5. Applicants and Residents are required to cooperate with the Management Agent during the screening process by providing truthful, complete information relating to all income, household composition, criminal history background, and all other household background information.

6. An Applicant with an unsatisfactory screening report will be denied and sent a suitability denial notice. A Resident household with an unsatisfactory screening report will be subject to termination or nonrenewal of the Resident household's Lease.

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7. Applicants and Residents with unsatisfactory screening reports will be presented with a suitability denial notice, which will include a copy of any adverse report(s) or reason(s), and the opportunity to dispute the accuracy and relevance of the adverse report(s) or reason(s). Applicants and Residents desiring to dispute such determinations, including those with adverse criminal history reports, may do so as set forth in the Statement of Corporate Policies, as applicable, based on the circumstances.

8. Atlanta Housing Authority and Management Agents may share information with one another on the denial of admission of Applicants and the termination of Residents in order to avoid any duplication of effort and ensure the integrity of the screening process.

ARTICLE SEVEN. CRIMINAL HISTORY SCREENING

Atlanta Housing Authority, Owner Entities, and/or Management Agents may deny admission to Applicants or terminate or not renew the leases of Residents if any of their household members are or have been engaged in criminal activity that could reasonably be expected to indicate a threat to the health, safety or welfare of other residents, Atlanta Housing Authority, Owner Entity, and/or Management Agent staff.

1. OFFENSES SPECIFICALLY IDENTIFIED BY HUD

   A. Pursuant to 24 CFR § 960.204, Applicants may be denied admission if any member of their households:

      i. Has been evicted from federally assisted housing for drug-related criminal activity within the three year period preceding application;

      ii. Is currently engaging in the illegal use of drugs;

      iii. Has ever been convicted of drug-related criminal activity for manufacture or production of methamphetamine on the premises of federally assisted housing;

      iv. Is subject to a lifetime registration requirement under a State sex offender registration program; or

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v. Is abusing or demonstrates a pattern of abuse of alcohol that may threaten the health, safety, or right to peaceful enjoyment of the premises by other residents.

B. Residents will also be subject to termination if, subsequent to admission, Atlanta Housing Authority determines that any of the statements included in Paragraph A above were applicable to Resident households at the time of admission.

2. VIOLENT OR DRUG-RELATED OFFENSES

Applicants may be denied admission and Residents may be subject to termination of tenancy if any member of their households have been convicted of, arrested or under an outstanding warrant for, or reasonably believed to be engaged in any Violent or Drug-Related Offenses. Examples of Violent or Drug-Related Offenses include, but are not limited to, the following:

A. Homicide, Murder, Voluntary Manslaughter;

B. Rape, Sexual Battery, other Aggravated Sex-Related Crimes;

C. Child Molestation, Child Sexual Exploitation;

D. Drug Charges;

E. Kidnapping, False Imprisonment;

F. Terrorism;

G. Arson;

H. Possessing, Transporting or Receiving Explosives or Destructive Devices with the Intent to Kill, Injure, Intimidate or Destroy;

I. Assault and Battery (Simple and Aggravated);

J. Trafficking, Distribution, Manufacture, Sale, Use, or Possession of Illegal Firearms;

K. "Carjacking;"

L. Robbery;

M. Hate Crimes;

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N. Criminal Damage to Property Endangering Life, Health and Safety;

O. Aiding and Abetting in the Commission of a Crime Involving Violence; and

P. Other Violent or Drug-Related Offenses that may Pose a Threat to Public Health and Safety.

3. OTHER CRIMINAL OFFENSES (Not Violent or Drug-related)

Applicants may be denied admission and Residents may be subject to termination of tenancy if any member of their households have, within the five year period preceding application or at any time during tenancy, been convicted of, arrested or under an outstanding warrant for, or reasonably believed to be engaged in any other criminal offenses that do not involve violence or drugs. Examples of Other Criminal Offenses (not violent or drug-related) include, but are not limited to the following:

A. Child Neglect;

B. Disorderly Conduct;

C. Abuse or Pattern of Abuse of Alcohol (to the extent such abuse poses a threat to the health, safety, or peaceful enjoyment of the premises by other residents);

D. Motor Vehicle Theft;

E. Burglary, Larceny, Receiving Stolen Goods;

F. Prostitution and Solicitation of Prostitution;

G. Vandalism; and

H. Other Offenses that may Pose a Threat to Public Health and Safety but do not involve Violence or Drugs.

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4. ADVERSE CRIMINAL HISTORY DECISIONS

A. NOTICE: Denied Applicants and Residents for whom termination is proposed will receive a written notice outlining:

i. The specific reasons for the denial or proposed termination;

ii. The dispute process; and

iii. The process for requesting reasonable accommodation in the dispute process for persons with disabilities.

B. Dispute Process Available to Applicants Denied for Criminal History

i. INFORMAL REVIEW: Denied Applicants have the right to request an informal review by an impartial person designated by the Management Agent who did not have any prior role in processing the Applicant's application and who is not the subordinate of the person who made the initial decision. Informal reviews must be requested in writing within ten (10) days from the date of receipt of the denial notice. If the Applicant requires assistance with making a written request, the Applicant may come into the management office before the end of the ten (10) day period to request assistance with the written request. If the Applicant does not submit a written request for an informal review within this time period, the decision will be considered final.

ii. DOCUMENT REVIEW: Prior to the informal review, a denied Applicant may request an opportunity to examine the application file and to copy any relevant documents at the Applicant's cost.

iii. WITNESSES AND REPRESENTATIVES: The Applicant may bring witnesses, representatives (including attorneys) or letters of support to the informal review. In the event the Management Agent presents any witnesses, the Applicant will have a right to cross-examine them.

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iv. DISPOSITIONS: Denied Applicants are encouraged to bring to the informal review a copy of the disposition of the criminal offenses which form the basis of the denial. If, however, a denied Applicant admits that he or she committed a crime, was convicted of a crime or that he or she entered a guilty plea for the criminal offense in question, the Applicant will not be required to provide additional information regarding a criminal conviction or a guilty plea. This does not mean, however, that an Applicant who admits to committing a crime, was convicted of a crime or entered a guilty plea will not be allowed to discuss the circumstances or any of the review considerations set forth below if he or she wants the Management Agent to consider such additional information.

v. REVIEW CONSIDERATIONS: At the informal review, a denied Applicant may present, and Management Agent will consider, evidence (including verbal and written statements) of the following:

a. Circumstances: Circumstances of the criminal case(s) and mitigating or aggravating circumstances;

b. Conduct: The time, nature and extent of the Applicant's conduct (including the severity of the conduct and the seriousness of the offense);

c. Future Danger: Whether the conduct indicates that the Applicant would pose a danger to the health, safety or welfare of other residents; whether the Applicant has been rehabilitated so as not to pose such a danger; and other facts which would prevent the Applicant from posing a danger.

vi. REVIEW DECISIONS: A written review decision should be provided to the denied Applicant within ten (10) days following the informal review or , if the reviewer requested additional information from the Applicant, within ten (10) days following the date the information was submitted, or was due if not submitted, whichever comes first. If the reviewer's decision is to deny the application, the decision shall set forth the reasons for the denial in detail.

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C. Residents subject to Lease termination who desire to dispute the accuracy and relevance of the criminal history information may do so as set forth in Part III, Article Seven: "Disputing Decisions of Manager."

PART III - RESIDENT BENEFITS AND OPPORTUNITIES

ARTICLE ONE. RENT, INDIVIDUAL DEVELOPMENT ACCOUNTS, AND SECURITY DEPOSITS

1. Residents are required to pay rent according to the instructions provided by the Management Agent pursuant to the terms of the Lease.

2. Atlanta Housing Authority may, from time to time, establish various rent structures that will combine the rent charged to Residents with the budgeted federal subsidy in order to balance affordability and operating expenses to ensure that the financial obligations of each community with Assisted Apartments are covered.

3. Rent structures will be evaluated on a property-by-property basis with the goal of using the rent structure that best positions the individual community to remain self-sustaining. The appropriate rent structure for each community with Assisted Apartments may be established by using one or a combination of the following income and non-income based approaches:

   A. "Income Adjusted Rent" which is a rent structure based on a percentage of the Resident's adjusted household income; and/or

   B. "Affordable Fixed Rent" which is a rent structure based on several property-related factors, including, but not limited to, the particular community in question, location, unit size, operating costs and other expenses, demand for the community, community demographics, and the amenity package.

4. When the Income Adjusted Rent and the Affordable Fixed Rent are available in the Resident's community, the amount of a Resident's rent will be based on whether a Resident selects either the "Income Adjusted Rent," or an "Affordable Fixed Rent."

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5. When the Income Adjusted Rent and the Affordable Fixed Rent are available in the Resident's community, a Resident will be subject to a "Rent Adjustment Fee" if the Resident changes the method of rent payment during the calendar year, unless the Resident can document a hardship reason as to why the change is necessary.

6. Affordable Fixed Rents may be the only rent structure offered in certain communities identified under Atlanta Housing Authority's Annual MTW Plan. Income-adjusted Rents will not be available in those communities. All Residents residing in these communities will have to pay the applicable Affordable Fixed Rent for Assisted Apartments in accordance with the schedule established for their community.

7. Atlanta Housing Authority, in its discretion, may establish fixed-rate, or standard deduction and asset determination procedures to be used in calculating Income-Adjusted Rents. 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 Income-Adjusted Rents. The Atlanta Housing Authority Board of Commissioners must approve the schedule of Standard Income Deductions and any changes to the treatment of assets prior to implementation.

8. Resident, or any Resident household member, whose employment status was either (i) reasonably relied upon by the Management Agent in determining the Resident's initial eligibility for admission; or (ii) achieved to satisfy Atlanta Housing Authority's work requirement and related policies, who then becomes unemployed due to her/his resignation, quitting, termination for cause, or other reasons based on the Resident's or Resident household member's actions after the execution of the Lease for an Assisted Apartment and during the Resident's ongoing term of tenancy in an Assisted Apartment, shall not receive any rent relief as a result of the loss of employment and shall continue to pay the Income Adjusted Rent or Affordable Fixed Rent based on prior employment status, as applicable, for the Resident in the Assisted Apartment.

This provision may be waived if the Resident can document to the satisfaction of the Management Agent, with the burden of proof on the Resident, that the reason for the Resident's loss of employment was based on an event that was beyond the control of the Resident and for which the Resident was not at fault.

9. Residents paying an Income Adjusted Rent must pay a minimum rent of $125, or such lesser or greater amount as Atlanta Housing Authority may set from time to time.
10. 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.
11. Under the Elderly Income Disregard policy, if an Elderly Resident, whose sole source of income is Social Security, SSI, and/or other fixed annuity pension and retirement plan income (Annual Fixed Income), becomes employed on a temporary, part-time, or other limited basis which does not result in the discontinuance of the Elderly Resident's Annual Fixed Income, the Elderly Resident's employment income will not be utilized in calculating annual income, and will be permanently disregarded thereafter.

12. Such Elderly Residents will still be expected to pay the Income Adjusted Rent based on the Annual Fixed Income and any adjustments to the Annual Fixed Income.

13. Security deposits shall be maintained at such levels as Atlanta Housing Authority, Owner Entities, and/or Management Agents may determine based on the bedroom size and the particular community with Assisted Apartments.

14. Generally, Atlanta Housing Authority does not expect that the establishment of a new minimum rent or other rent structure described in paragraph 3 of this Article will create a hardship since no such rent initiatives will go into effect without providing at least sixty (60) days advance notice. Even so, a household who has previously paid one or more months of rent but is unable to pay the minimum rent, due to extraordinary financial distress, may request hardship consideration.

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A. A hardship may exist for a Resident household when any one of the following circumstances is present: (i) the household is no longer eligible for (through no fault of the household) or is waiting for an eligibility determination for a Federal, State, or local assistance program; (ii) the income of the household has decreased because of extraordinary changed circumstances, including loss of employment (through no fault of the household); (iii) although the household is diligently seeking to increase the household's income, the increase is not yet sufficient to fully pay the new rent ; or (iv) such other extraordinary circumstances as the Management Agent may determine.

B. The Management Agent shall promptly investigate any request for hardship and take appropriate actions based on whether a hardship is established and the Resident household is otherwise complying with its obligations under an approved economic independence program and the planning documents formulated for the household.

C. Such actions under paragraph B above may include, but not be limited to:

   i. Temporary suspension of the minimum rent requirement under such terms as the Management Agent shall direct. Such suspensions shall not last greater than ninety (90) days unless otherwise extended upon the written request of the Resident household based on verifiable circumstances reasonably affecting the Resident household's ability to pay the minimum rent. The period of the temporary suspension may be extended by the Management Agent after supervisory review and documented approval of the request;

   ii. Accelerated enrollment in one of Atlanta Housing Authority's approved economic independence program components;

   iii. Referral to third party agencies who assist residents with the payment of rent; and

   iv. Such other actions as the Management Agent shall direct.

D. The Resident household will not be required to pay minimum rent arrearages that accumulated during the entire period of an approved temporary suspension of the minimum rent as set forth in paragraph C above.

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ARTICLE TWO. BASIC LEASE OBLIGATIONS AND RESPONSIBILITIES

1. Residents are to live in the apartment in such a manner so as to not adversely impact the quiet, peaceful enjoyment of the premises by other residents while meeting all of the obligations set forth in the Lease, including, but not limited to, those obligations relating to the work requirement, housekeeping, other health and safety concerns, criminal activity prohibitions, reporting criminal activity on the premises, and economic independence initiatives.

2. Each Resident household must undergo a "Lease Renewal Review" or recertification process in a manner and at a frequency determined by the Management Agent based on the particular community in which the Resident resides. Lease Renewal Reviews may be conducted annually, on an interim basis, or over some longer interval of time according to the Moving to Work Annual Plan and as established in the Management Operating Procedures.

3. All household members, 16 years of age or older, are required to execute authorization forms allowing the Management Agent to conduct any background check, examination, or verification required for appropriate determinations under the initial or periodic recertification process in order to ensure Residents meet all criteria for continued occupancy. The period of the authorization will be established in the Management Operating Procedures.

4. Each adult Resident (18 to 61 years of age) is required to be gainfully employed on a full-time basis (see Part Two, Article Four) unless the resident is Elderly or Disabled.

5. Resident households with adult members who are neither Elderly nor Disabled and who are not legally and gainfully employed or self-employed on a full-time basis as defined by the Management Operating Procedures are subject to Lease termination.

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6. The Management Agent may approve, in its sole discretion subject to verification, any combination of full-time or part-time gainful employment and full-time or part-time attendance at an Atlanta Housing Authority-recognized school, institution, and/or Atlanta Housing Authority-approved training program, provided that, when combined, total a minimum number of 30 hours equivalent to the full-time employment required in accordance with eligibility and qualification requirements of this Statement of Corporate Policies.

7. Any Resident, who loses Resident's job or welfare benefit for whatever reason due to Resident's own fault, shall continue to pay the Rent based on the Resident's prior employment income or welfare benefit status, unless the Resident can document to the satisfaction of the Management Agent, with the burden of proof on the Resident, that the reason for the Resident's loss of employment or welfare benefit was not the Resident's fault.
8. Residents who are not working full-time may be required to enroll and satisfactorily participate in an established and Atlanta Housing Authority-approved economic independence program, and may be required to have part-time employment.
9. Each Resident, regardless of the Resident's work status (full or part-time employment), may be required to participate in an approved economic and life-style initiative that has as one of its components, the completion of an approved planning document, which charts out a path for the Resident towards economic, and life-style independence and devises strategies to address any barriers confronting the Resident.
10. Each adult Resident (18 to 61 year old), who is enrolled in and attending a training component of an approved economic independence program, or attending school, but is not in training or class at least 30 hours per week, must work the required number of hours to achieve, at a minimum, a combination of training/schooling *and* work hours of 30 hours per week.
11. Upon review of a Resident's circumstances related to a verified disability of a member or members of the Resident household, the Management Agent may consider and document extensions of the work/program participation requirement as a reasonable accommodation if justified by the circumstances.

12. HUD established the Community Service and Self-Sufficiency Requirement (CSSR) which requires most unemployed public housing residents ages 18 - 61, who are not receiving TANF benefits, exempt from work requirements, engaged in work activities or unable to comply because of a disability, to contribute the HUD-specified number of hours each month to community service or an economic self-sufficiency program. Residents in compliance with Atlanta Housing Authority's full-time employment requirement of 30 hours per week, or a combination of training/schooling *and* work hours of 30 hours per week, are considered by Atlanta Housing Authority to be in compliance with CSSR.

13. Any school age member of the Resident household who is under 18 years of age and who has not completed her/his secondary education may be required to enroll in and attend an accredited public or private secondary academic or technical school.

14. Each Resident is responsible for ensuring that all school age members of the Resident household attend school on a regular basis in accordance with local school board policies and state law. Resident shall provide the Management Agent with such information, releases and authority so that the Management Agent can inquire into the attendance status of any school age child on the Lease.

15. Each Resident Head of Household and Resident household member shall be responsible for the actions and activities of household members, visitors, guests, and invitees while those persons are either a member of the household, visiting the household, or are on the property.

16. Residents who fail to fulfill the obligations and responsibilities under the provisions of this Part III, Article Two, or under the provisions of the Lease shall be subject to the denial or significant reduction in rental subsidy resulting in an increase in the amount of Rent, or the nonrenewal or termination of their Lease.

ARTICLE THREE. OCCUPANCY, CHARGES AND ALLOWANCES

1. To avoid overcrowding and the conditions that may arise from overcrowding, Residents will be assigned to an apartment so that generally no more than two adults occupy a bedroom. Additional consideration, as determined by the Management Agent, may be given to households with small children or households with other significant circumstances, who may be requesting a larger apartment.

2. A Live-in Aide that is essential for the care and support of an Elderly or Disabled Resident, the need for which having been certified by a medical professional, may reside in the Assisted Apartment with the Elderly or Disabled Resident. In that the Management Agent has the sole authority to approve a Live-in Aide, a Live-in Aide must demonstrate her/his suitability as a Resident pursuant to Part II of this Statement of Corporate Policies prior to occupancy, and continue to demonstrate her/his suitability as a Resident and status as a Live-in Aide for as long as the Live-in Aide resides in the Assisted Apartment.

3. Atlanta Housing Authority will establish utility allowances by bedroom size for each community based on the reasonable rate of utility consumption by energy conservative households; and may, after considering the existing condition of a community, including the age of building infrastructures, amount of insulation, and air circulation, adjust such allowances to account for the utility consumption required to maintain a reasonable quality of life environment under such conditions.

4. Residents who exceed the utility allowances will be charged for the excess utility usage.

5. The Management Agent may establish and, if approved by Atlanta Housing Authority or the Owner Entity, publish for each community with Assisted Apartments a schedule of reasonable fees and charges, including but not limited to Maintenance Charges, Transfer Fees, Application Fees, Damage Fees, Supplemental Screening Fees, Pet Deposits, Pet Application Fees, and Dispossessory Fees which may be charged to residents in addition to rent and excess utility charges, as applicable.

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ARTICLE FOUR. TRANSFERS

1. Residents may request a transfer to another Assisted Apartment within the same community with Assisted Apartments subject to approval by the Management Agent ("Community Transfer"). A request to move to another community is not considered a Community Transfer. Residents cannot initiate a transfer to another community. Residents must submit an application to the other community and, if approved, provide the appropriate notice under the current Lease, except as provided for in Section 6 of this Article Four.
2. Residents who have requested a Community Transfer must be current in all obligations under the Lease including, but not limited to having no outstanding charges for rent or other charges; no chronic rent delinquency (more than one late payment in a four month period); and no insufficient fund charges for the preceding six months.
3. A Resident's request for a Community Transfer shall not be approved if the Resident has resided in the current apartment for less than one year, except in those cases where there are verifiable medical reasons or a verifiable disability requiring special features, which cannot be provided through a reasonable accommodation in the current unit.
4. If the Community Transfer is approved by the Management Agent, the Resident must pay a "Transfer Fee" based on the schedule of fees published for the particular community with Assisted Apartments.
5. Residents will not have to pay the Transfer Fee if the Community Transfer is required or initiated by Atlanta Housing Authority, Owner Entity, or Management Agent, or for such other valid reason, such as a reasonable accommodation as outlined in Section 6, as determined by the Management Agent.
6. The following policies apply to reasonable accommodation transfers.

    A. All reasonable accommodation transfers have priority over all other transfers, except natural disaster transfers, emergency transfers and relocations;

    B. Residents with disabilities who require a transfer to another Affordable Community as a reasonable accommodation will not be required to make a separate application at the desired Atlanta Housing Authority Affordable Community;

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C. A Resident's initial security deposit will be transferred to the new unit and no additional security deposit charges will be incurred when the Resident with disabilities transfers to another Affordable Community as a reasonable accommodation; and

D. Residents with disabilities who require a transfer as a reasonable accommodation will not incur any termination penalties for early lease termination.

E. Management Agents of Affordable Communities and Signature Communities will maintain a Transfer List that prioritizes the transfer of Residents who require a transfer due to a disability over new admissions of Applicants. The Transfer List will document the following:

i. Date and time of each reasonable accommodation transfer request;

ii. Name and address of Resident(s) to be transferred;

iii. Reason(s) for transfer, including information regarding the Resident's reasonable accommodation request(s) and/or request for a UFAS-Accessible Unit or an Assisted Apartment with accessible features;

iv. Current disposition of reasonable accommodation transfer request;

v. Date of transfer; and

vi. Name of Resident transferred out of an Assisted Apartment to accommodate a Resident's disability per the Management Agent's execution of a lease addendum that requires a Resident without a disability to relocate to a vacant, non-accessible unit, at no expense to that Resident.

7. Atlanta Housing Authority may initiate "Relocation Transfers" outside of a community from time to time to facilitate Atlanta Housing Authority's property repositioning strategy, which includes, but is not limited to, the sale of property, revitalization activities, and/or development opportunities related to Atlanta Housing Authority-owned property, or for other valid reasons as determined by Atlanta Housing Authority.

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8. Relocation Transfers are transfers from one Atlanta Housing Authority-owned community to another Atlanta Housing Authority-owned community ("Destination Community"). Relocation Transfers are not considered Community Transfers, as described above in this Article Four, and Residents are not subject to the same requirements as set forth above for Community Transfers. Residents who are subject to Relocation Transfers bypass the waiting list at the Destination Community and receive priority consideration for the first available Assisted Apartment at the Destination Community. Such Residents must meet the eligibility and suitability requirements outlined in Part II of the Statement of Corporate Policies in order to be transferred to the Destination Community.
9. In order to accommodate a Resident household and to avoid overcrowding when a suitably sized apartment is not available, the Resident may request and the Management Agent may approve a Community Transfer from one apartment to two apartments ("Split-Family Transfer"). The Resident's request must be in writing stating the reason for the Split-Family Transfer, unless initiated by the Management Agent. Whether requested by the Resident or initiated by the Management Agent, the Resident must agree in writing to a Split-Family Transfer.
10. To qualify for a Split-Family Transfer, the Resident household must meet the requirements of this Article Four and the proposed Heads-of-Household of the units to be assigned under the Split-Family Transfer must be: (a) listed on the existing Lease as a member of the household as of the most recent recertification; and (b) legally capable of executing a lease.
11. Split-Family Transfers may be used by Resident households subject to Relocation Transfers when a suitably sized apartment is not available in a Destination Community. Such Resident households must qualify for the Split-Family Transfer pursuant to this Article Four, as applicable.

ARTICLE FIVE. INDIVIDUAL DEVELOPMENT ACCOUNT (IDA) INITIATIVE

Having eliminated the federal earned income disallowance for Residents paying an Income Adjusted Rent, Atlanta Housing Authority, in its discretion, may implement an IDA initiative which would promote and encourage personal economic independence among Residents through a monetary incentive program.

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1. The IDA initiative would be linked to meaningful capacity-building initiatives offered by a variety of organizations and institutions in Atlanta.
2. A mechanism would be created for eligible Residents which would allow them to accrue a portion of their rental payments, which is in excess of a monetary threshold as determined by Atlanta Housing Authority, in a separate IIDA.
3. To fulfill the eligibility requirements of the program, all Residents would be enrolled in the IDA initiative, and would be required to participate in a personal economic development program approved by Atlanta Housing Authority.
4. The IDA initiative would give Residents the opportunity to accumulate financial resources to assist in their transition off of subsidy assistance.
5. The IDA initiative incentive would require eligible Residents to participate successfully by obtaining employment and achieving other economic independence milestones established under an approved economic independence program.
6. As Residents achieve their individualized milestones, Atlanta Housing Authority would collect and defer a portion of the rents collected beyond the assessed carrying cost of the Assisted Apartment in an IDA fund.
7. Residents that achieve the self-sufficiency and economic independence milestones would be eligible for reimbursement of IDA funds. Those who do not achieve their milestones would not be eligible for the IDA initiative nor would they be eligible to receive a reimbursement of any portion of the funds in the IDA account.

ARTICLE SIX. PET POLICY

1. Atlanta Housing Authority will permit Residents of communities with Assisted Apartments to keep common household pets or other animals that are widely acknowledged and accepted as household pets, provided the Resident's keeping of a pet is not a threat to the health and safety of other residents and otherwise meets the requirements established by the Management Agent for the community.
2. Residents of communities with Assisted Apartments are not allowed to keep animals that are not widely acknowledged and accepted as household pets; to keep unregistered household pets; to keep household pets temporarily; or train or engage in any business activity related to household pets in the Resident's apartment, or anywhere else within the community.

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3. Residents in a Signature Community, who desire to keep a common household pet, may only do so if household pets are generally allowed at the community except as provided for in Section 5 below, and then only in strict accordance with the household pet procedures prescribed at the Resident's Signature Community.

4. Certain Signature Communities may exclude common household pets altogether if it is in the best interest of the community to do so, except as provided for in Section 5 below.

5. Management Agents will make reasonable accommodations for an "assistance animal" or a pet that Atlanta Housing Authority reasonably considers as a common household pet required as part of treatment for a demonstrated and verified medical condition tantamount to a disability or handicap. Pet policies for Affordable Communities and Signature Communities shall:

   A. Expressly exclude Assistance Animals;

   B. Clarify that an "Assistance Animal" is an animal that is needed as a reasonable accommodation for persons with disabilities and is not subject to the general pet policy;

   C. Define an "Assistance Animal" as an animal that is needed as a reasonable accommodation for persons with disabilities (Assistance Animals are animals that work, provide assistance, or perform tasks for the benefit of a person with a disability; or animals that provide emotional support that alleviate one or more identified symptoms or effects of a person's disability);

   D. Remove height and weight restrictions for Assistance Animals;

   E. Remove breed restrictions for Assistance Animals, except in accordance with local laws or ordinances;

   F. Remove pet deposits for Assistance Animals; and

   G. Clarify that any household pet exclusions in any community's policies do not apply to Assistance Animals required by Residents of Assisted Apartments.

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ARTICLE SEVEN. DISPUTING DECISIONS OF MANAGER

The purpose of Article Seven is to provide Applicants and Residents with a dispute process to address eligibility, general admissions, occupancy and leasing issues, and requests for reasonable accommodations in a manner that seeks equitable resolutions to such issues in an expedient and responsive manner. Applicants and Residents with disabilities may request reasonable accommodations in order to participate in the dispute process.

The dispute process outlined in this Article Seven shall not govern the process related to the denial of admission based on the findings of a criminal history report as outlined in Part II, Article Seven, Paragraph 4 (Adverse Criminal History Decision) of the Statement of Corporate Policies.

1. DISPUTE PROCESS FOR APPLICANTS

   A. Applicants for Assisted Apartments who are denied admission based on eligibility and general admissions criteria and desire to dispute this action must request a meeting with the Management Agent or the Management Agent's designee within ten (10) calendar days of the disputed action.

   B. An Applicant's request for a meeting must be in writing.

   C. The Management Agent will schedule the meeting within a reasonable period of time, provided the Applicant's written request for the meeting was received in a timely manner.

   D. An Applicant may bring a representative to this meeting to assist the Applicant.

   E. The Management Agent is under no obligation to meet with the Applicant after the conclusion of the requested meeting.

   F. A written decision should be provided to the Applicant within a reasonable time following the conclusion of the meeting. If the Management Agent's decision is to deny the application, the decision shall set forth the reasons for the denial.

2. DISPUTE PROCESS FOR RESIDENTS

   A. The Management Agent is authorized under the terms of the Lease, Lease Addenda, and Apartment Rules to initiate an adverse action against a Resident with respect to leasing and occupancy violations that may result in a denial, significant reduction or termination of benefits otherwise due a Resident.

B. Residents may dispute such adverse actions.

C. Residents must request a meeting with the Management Agent or the Management Agent's designee within ten (10) calendar days of notice of the adverse action or in accordance with the dispute handling procedures in effect at the Resident's community with Assisted Apartments.

D. The period of time within which the Resident must request a meeting may be shorter if the Resident's Lease is being terminated for criminal activity and the Management Agent has reasonably determined that the Resident poses a threat to the health and safety of the Community.

E. A Resident's request for a meeting must be in writing.

F. The dispute process at each community with Assisted Apartments must allow the Resident to meet with an impartial designee of the Management Agent who did not participate in the initial decision affecting the Resident. The impartial designee may not be a subordinate of the person who made the initial decision. Any Resident meetings with the person who made the initial decision and the impartial designee may be combined, at the discretion of the Management Agent. A Resident may bring a representative to this meeting or meetings to assist the Resident.

G. The impartial designee of the Management Agent is under no obligation to meet with the Resident about the dispute after the conclusion of the final meeting.

H. A written decision should be provided to the Resident within a reasonable time following the conclusion of the meeting. If the impartial designee's decision is to rule against the Resident, the decision shall set forth the reasons for the denial, significant reduction or termination of benefits.

PART IV - MISCELLANEOUS

ARTICLE ONE. AVAILABILITY OF OFFICIAL LEASING DOCUMENTS

1. Official leasing-related documents will be maintained in the management office of any community with Assisted Apartments.

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2. Official leasing-related documents can be reviewed by Applicants, Residents, and other interested parties upon reasonable request and notice during normal office hours.
3. Amendments and/or updates to Fee Schedules, Rent Structures, Utility Allowances, Routine Maintenance and other charges may be approved from time to time. Such amendments and/or updates shall be implemented only after Residents have been given reasonable notice of the effective date.

ARTICLE TWO. SPECIAL PROGRAM, POLICY AND/OR STRATEGIC INITIATIVES

Atlanta Housing Authority may establish special programs, policies and strategies designed to address Resident economic or life-style self-sufficiency programs, *Moving to Work Demonstration Program* initiatives, safe and secure community enhancements and admission policies related to the use of bona fide law enforcement agencies or personnel, and homeownership opportunities.

Written proposals outlining procedures and processes developed for any special program, policy and/or strategy must be approved and/or authorized by the President and Chief Executive Officer for inclusion in the MTW Annual Plan or protocol before the initiative can be implemented.

ARTICLE THREE. RESPONSE TO FEDERALLY DECLARED DISASTERS AND OTHER FEDERALLY DECLARED EMERGENCIES

In order to respond to federally declared disasters and other federally declared emergencies Atlanta Housing Authority may provide disaster or other emergency relief utilizing Atlanta Housing Authority-owned conventional public housing apartments, subject to HUD or another third party providing additional funding or other resources for these purposes.

1. The President and Chief Executive Officer is authorized to develop an agency-wide disaster or other emergency relief plan to address the needs arising from a disaster or other emergency in a strategic, meaningful, and effective manner pursuant to applicable rules, regulations, emergency legislation, and Executive Orders.

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2. The President and CEO is further authorized to take any action that the President and CEO may deem necessary and appropriate pursuant to federal disaster relief authorizations applicable to housing programs within the scope of the resources available to Atlanta Housing Authority, and to waive Atlanta Housing Authority's administrative policies governing Atlanta Housing Authority-owned conventional public housing communities related to intake procedures including but not limited to establishing a preference for disaster victims on waiting lists for Atlanta Housing Authority-owned conventional public housing, rent collections, subsidy payments, work program compliance, and other related and relevant administrative policies.

3. The President and CEO will provide the Board of Commissioners with a full report on a disaster or emergency relief plan implemented pursuant to this Article Three.

ARTICLE FOUR. APPROVAL OF MANAGEMENT PRACTICES

Management Operating Procedures, administrative procedures, processes, protocols, and management practices for any policy, initiative, or approach in this Statement of Corporate Policies shall be developed following the intent of this Statement of Corporate Policies and may be approved, amended, or withdrawn at the discretion of Atlanta Housing Authority.

ARTICLE FIVE. REVISIONS TO THE STATEMENT OF CORPORATE POLICIES

The President and Chief Executive Officer of Atlanta Housing Authority, as vested by the Board of Commissioners, can authorize revisions, as appropriate, to this Statement of Corporate Policies in order to clarify the original intent of any policy enumerated herein without the prior approval of the Board of Commissioners, provided that any such revision to this Statement of Corporate Policies does not alter, change, or modify the original intent of any policy. Any other such alterations, changes, and modifications to any policy in this Statement of Corporate Policies must be approved by the Board of Commissioners.

[END]

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Statement of Policies
Governing the Housing Choice Tenant-Based Program

First Adopted by the Board of Commissioners on August 25, 2004
As the *Administrative Plan Governing the Housing Choice Voucher Program*

Revision 7

Amended by the Board of Commissioners
September 3, 2008

The Housing Authority of the City Of Atlanta, Georgia

Statement of Policies Governing the Housing Choice Tenant-Based Program

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The Housing Authority of the City of Atlanta, Georgia

Statement of Policies
Governing the Housing Choice Tenant-Based Program

PREAMBLE

This Statement of Policies Governing the Housing Choice Tenant-Based Program ("Statement of Housing Choice Policies"), formerly the Administrative Plan Governing the Housing Choice Voucher Program, forms the broad policy basis of and authorizes the establishment of administrative procedures and practices that govern the Housing Choice Tenant-Based Program of The Housing Authority of the City of Atlanta, Georgia ("Atlanta Housing Authority").

This Statement of Housing Choice Policies is organized around the guiding principles of Atlanta Housing Authority's continuing success as a provider or sponsor of quality affordable housing in its role as a leader in community building initiatives that create vibrant and safe environments for families, seniors and persons with disabilities.

This Statement of Housing Choice Policies envisions and supports a Housing Choice Tenant-Based Program that is creative in design, effective in the development of procedures and processes, and nimble in the successful implementation of the program and related initiatives that enhance the quality of life of participating families, seniors and persons with disabilities. The Housing Choice Tenant-Based Program is a means for eligible participants to access quality housing in communities of opportunity and promote participant economic and lifestyle self-sufficiency.

This Statement of Housing Choice Policies is aligned with the Amended and Restated Moving to Work Agreement, effective as of November 13, 2008, as further amended by that certain Second Amendment to the Moving to Work Agreement, effective as of January 16, 2009, as may be amended or extended from time to time, by and between the U.S. Department of Housing and Urban Development and Atlanta Housing Authority ("MTW Agreement"). The MTW Agreement governs and supersedes, as appropriate, applicable Federal laws, rules, regulations, contracts, and agreements that have been or will be waived and/or modified by the MTW Agreement.

Housing Choice policies were adopted by the Atlanta Housing Authority's Board of Commissioners on August 25, 2004. Six amendments to the plan have been approved subsequent to the initial date of adoption, whereupon this is the seventh amendment. This Statement of Housing Choice Policies supersedes all prior versions of Atlanta Housing Authority's Housing Choice administrative plan policies and has precedence over all administrative procedures and management practices that may be in conflict with it.

This Statement of Housing Choice Policies may be amended or modified by the President and Chief Executive Officer at any time without a vote of the Board of Commissioners, provided that such amendments and modifications do not materially change the intent of those Policies.

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PART I – INTRODUCTION

ARTICLE ONE. OBJECTIVE

This Statement of Housing Choice Policies is Atlanta Housing Authority's policy document for the Housing Choice Tenant-Based Program ("Program") in support of Atlanta Housing Authority's Vision of Healthy Mixed-Income Communities.

ARTICLE TWO. PROGRAM MANAGEMENT AND OPERATING PROCEDURES

1. The Operations Division performs all program management functions related to the implementation and administration of the Program. The Operations Division is responsible for developing and implementing written Program operating procedures ("Operating Procedures") that are consistent with the policies outlined in this Statement of Housing Choice Policies.

2. The Operations Division may create and apply technology solutions to improve the efficiency and effectiveness of applicable program management functions in order to create, where appropriate and practical, a paperless environment. The Operations Division will include the requirements, procedures and processes for the implementation and administration of technology solutions and concomitant applications in the Operating Procedures.

ARTICLE THREE. MOVING TO WORK DEMONSTRATION PROGRAM

1. As a Moving to Work agency, Atlanta Housing Authority will establish, implement and evaluate innovative affordable housing strategies that are designed to achieve greater success in helping low income families achieve economic independence.

2. While recognizing that implementation of strategic initiatives may be immediate, progressive, or refined through various activities and demonstration programs, the implementation of those strategic initiatives, not immediately enumerated in Atlanta Housing Authority's Moving to Work (MTW) Annual Plan, may be advanced, provided such strategic initiatives are consistent with the Statement of Housing Choice Policies and the spirit and intent of the authorizations under the MTW Agreement.

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3. Administrative procedures, processes and general management practices for new strategic initiatives shall be developed following the intent of this Statement of Housing Choice Policies and may be amended from time to time at the discretion of Atlanta Housing Authority.

4. The President and Chief Executive Officer of Atlanta Housing Authority, as vested by the Board of Commissioners, can authorize revisions, as appropriate, to this Statement of Housing Choice Policies in order to clarify the original intent of any policy enumerated herein without the prior approval of the Board of Commissioners, provided that any such revision to this Statement of Housing Choice Policies does not alter, change, or modify the original intent of any policy. Any other alterations, changes, and modifications to any policy in this Statement of Housing Choice Policies must be approved by the Board of Commissioners.

ARTICLE FOUR. FAIR HOUSING AND EQUAL OPPORTUNITY

1. Atlanta Housing Authority supports all applicable Federal and State nondiscrimination and fair housing laws and applicable U.S. Department of Housing and Urban Development ("HUD") regulations in all housing and program activities. This support is evident in communities that Atlanta Housing Authority owns and those that Atlanta Housing Authority sponsors through revitalization and development activities. Atlanta Housing Authority monitors fair housing and equal opportunity compliance throughout its portfolio.

2. Atlanta Housing Authority acknowledges the protections afforded victims under the *Violence Against Women Act*, and has included administrative measures to address those protections in the Operating Procedures, as applicable.

3. Atlanta Housing Authority acknowledges the importance of serving Limited English Proficiency (LEP) persons. The extent to which it is determined that a significant number or proportion of the population served by the Program is comprised of LEP persons, Atlanta Housing Authority will develop and implement a LEP Plan to address the needs of such persons, as appropriate and in consideration of the cost and availability of resources that would be needed to provide translation services to LEP persons.

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4. Atlanta Housing Authority shall assist Applicants and Participants with disabilities in accordance with such federal laws, rules and regulations that are applicable to the administration of the Program with respect to application procedures, ongoing program participation, and procedures related to the acceptance, processing and disposition of reasonable accommodation requests.

ARTICLE FIVE. FRAUD AND MISREPRESENTATION

1. The terms Applicant and Participant are defined to include all family/household members with respect to their compliance with the policies set forth in the Statement of Housing Choice Policies and implemented through the Operating Procedures.

2. Applicants and Participants are required to provide truthful, complete information relating to participation in other housing subsidy programs, income from all sources, family composition, and all family background information to qualify for initial eligibility and continued participation in the Program.

3. Applicants and Participants who engage in acts of fraud and misrepresentation are subject to loss of Program benefits and prosecution under State and Federal laws, and where appropriate, will be referred for prosecution by Atlanta Housing Authority.

4. An Applicant or Participant who has made any misrepresentation or engaged in acts of fraud at the time of admission, during any subsequent recertification, or at any other time shall be denied admission or be subject to termination, as applicable.

PART II – ADMISSION TO THE PROGRAM

ARTICLE ONE. WAITING LIST NOTFICATION

1. Atlanta Housing Authority will comply with all Fair Housing and Equal Opportunity requirements applicable to public notices announcing the opening and closing of the Program waiting list ("Waiting List") for a Housing Choice Tenant-Based Voucher ("Voucher").

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2. Atlanta Housing Authority will make reasonable efforts to provide adequate notification to potential applicants with respect to applicant eligibility, the period of the opening, reasonable accommodations needs and other details related to the acceptance of applications to the Waiting List as set forth in the Operating Procedures.

ARTICLE TWO. SPECIAL ADMISSIONS

1. Atlanta Housing Authority may accept applications from eligible households who have relocated from a community owned by Atlanta Housing Authority due to demolition, repositioning, disposition or other related Atlanta Housing Authority activities without opening the Waiting List.

2. Atlanta Housing Authority, in its discretion, may authorize the special admission of eligible and qualified applicants to the Program, in order to implement special initiatives; offer homeownership opportunities to eligible households; admit households impacted by an owner opt-out of a housing assistance contract on a HUD-insured multi-family development; address an urgent local need as determined and approved by Atlanta Housing Authority including, but not limited to, foreclosure assistance and natural disasters; or provide relocation and/or transfer assistance to an eligible and qualified person with a verifiable disability who resides in an Atlanta Housing Authority-owned community or whose name is on a transfer/waiting list to be assisted under any Atlanta Housing Authority housing program as a reasonable accommodation.

3. Any household eligible for a special admission under this Article Two will not be denied a Voucher for admission to the Housing Choice Program provided that no member of the household has committed an offense specifically identified by HUD pursuant to 24 CFR 982.353 as described in Part XII, Article Three, paragraph 2 of this Statement of Housing Choice Policies. Atlanta Housing Authority, in its discretion, may deny special admission to a household if any member of the household has committed a violent offense as described in Part XII, Article Three, paragraph 3 of this Statement of Housing Choice Policies.

4. Procedures, processes and general management practices for special admissions are outlined in the Operating Procedures.

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ARTICLE THREE. APPLICATION

The application process and administrative procedures for placing Applicants on the Waiting List and determining eligibility and qualification for selection and program participation are set forth in the Operating Procedures.

ARTICLE FOUR. ORGANIZATION AND MAINTENANCE

1. The equitable methods of ranking Applicants on the Waiting List and the processes for organizing, updating and maintaining Applicant records are set forth in the Operating Procedures.
2. The maintenance of the Waiting List with respect to updating applications, notice letters, and purges is detailed in the Operating Procedures.
3. Applicant responsibilities and requirements for updating changes to the information reported during the application process and for responding to requests for information are stated in the Operating Procedures.

ARTICLE FIVE. SELECTION TO THE PROGRAM ("SELECTION")

1. Definitions of Family.

   A. A Family is defined as two or more persons who may or may not be related that are residing together in the same household.

   B. An Elderly Family is defined as a Family in which the head-of-household, spouse, or sole adult member of the household is age 62 or older.

   C. A Disabled Family is defined as a Family in which the head-of-household, spouse, or sole adult member of the household is a person with a verifiable disability.

   D. Any member of an Elderly Family or Disabled Family who is not elderly (62 years or older) or a person with a verifiable disability, other than an approved live-in-aide or a household member who is otherwise needed in the home as a reasonable accommodation to care for an elderly and/or disabled household member based on verifiable circumstances for a recognized period of time, must be in compliance with the qualifications outlined in this Article Five.

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2. Selection Qualifications.

   Provided the Applicant household is not an Elderly Family or a Disabled Family, at least one adult member of the Applicant household, 18 years of age or older, must be either legally and gainfully employed on a full-time basis for at least 30 hours per week or legally and gainfully self-employed in a legitimate business enterprise, appropriately documented, for at least 30 hours per week as defined by the Operating Procedures; and all other members of the household, including such other household members in an Elderly Family or Disabled Family, must be either:

   A. 18 to 61 years old, and legally and gainfully employed or self-employed (as described above) on a full-time basis at least 30 hours per week;

   B. 18 to 61 years old and a full-time student at an Atlanta Housing Authority recognized school or institution;

   C. 18 to 61 years old and employed (but not self-employed) on a part-time basis and either attending an Atlanta Housing Authority-recognized school or institution on a part-time basis or participating in an Atlanta Housing Authority-approved training program for a combined minimum total of thirty (30)hours per week for employment and education/training;

   D. Elderly; or

   E. Disabled.

3. General Considerations for Selection

   A. Participants, or any member of the Participant's household, whose employment status was either (1) reasonably relied upon by Atlanta Housing Authority in determining the Participant's initial eligibility for admission; or (2) achieved to satisfy Atlanta Housing Authority's work requirement and related policies, and who then becomes unemployed after Selection due to her/his resignation, quitting, termination for cause, or other reasons based on the Participant's or member's actions, shall not receive any rent relief as a result of the loss of employment and shall continue to be responsible for the entire Total Tenant Payment based on prior employment status.

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B. The provision in the preceding paragraph may be waived if the Participant can document, to the satisfaction of Atlanta Housing Authority, with the burden of proof on the Participant, that the reason for the Participant's loss of employment was based on an event that was beyond the control of the Participant and for which the Participant was not at fault.

C. To be eligible for Selection in accordance with this Article, an Applicant's qualifications for Selection as a Participant must be verified through appropriate documentation as set forth in the Operating Procedures

PART III – ELIGIBILTY

ARTICLE ONE. DETERMINATION AND VERIFICATION

An Applicant desiring to participate in the Program must complete a full application in accordance with the Operating Procedures and demonstrate that: (a) Applicant meets one of the definitions of Family and is an eligible low income household based on total annual household income pursuant to and verified according to HUD rules and regulations and this Statement of Housing Choice Policies; (b) Applicant fully satisfies HUD's statutory and regulatory requirements for citizenship and/or eligible immigrant status; (c) Applicant is in compliance with the qualifications outlined in Part II, Article Five; (d) Applicant would be a suitable Participant based on past satisfactory behavior including, but not limited to, an acceptable criminal background record; and (e) Applicant is able to comply with all Program obligations.

ARTICLE TWO. PARTICIPANT OBLIGATIONS AND RESPONSIBILITIES

1. Participants must occupy their assisted unit as their sole place of residence and conduct themselves in an acceptable and responsible manner that would not adversely impact the quiet and peaceful enjoyment of the premises and neighborhood by other community residents.

2. Participants must meet all obligations set forth in this Statement of Housing Choice Policies as implemented through the Operating Procedures, including, but not limited to those obligations relating to housekeeping, other health and safety concerns, criminal activity prohibitions, and economic independence initiatives.

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ARTICLE THREE. SUITABLITY

Atlanta Housing Authority determines Participant eligibility for the Program in accordance with the Operating Procedures but does not otherwise screen Participants as to their suitability as tenants. It is the rental property owner's (Owner/Landlord) responsibility to screen the suitability and acceptability of Participants as prospective tenants using their screening criteria in compliance with the Fair Housing Act.

ARTICLE FOUR. INELIGIBILITY DETERMINATION

Atlanta Housing Authority will notify Applicants, in writing, of an ineligibility determination. Such notification will set forth the reasons for the ineligibility determination and provide instructions regarding how the ineligible Applicant may request a review of the determination.

PART IV – RENT

ARTICLE ONE. HOUSING AFFORDABILITY POLICY

In order to preserve housing affordability for Participants of the Program, each Participant, unless subject to the minimum rent established by Atlanta Housing Authority, will pay no more than 30% of the household's monthly adjusted income for rent and utilities and other services ("Total Tenant Payment").

ARTICLE TWO. TENANT RENT

The rent payable to the Owner/Landlord by the Participant is the Tenant Rent. The Tenant Rent will be equal to the Total Tenant Payment unless the Total Tenant Payment has been reduced by an allowance for any utility or service for which the Participant has full financial responsibility pursuant to the lease agreement between the Participant and Owner/Landlord. Determinations of the Total Tenant Payment and Tenant Rent will be in accordance with the Operating Procedures.

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ARTICLE THREE. UTILITY ALLOWANCE SCHEDULE

The schedule of utilities and other services ("Utility Allowance Schedule") used in calculating Tenant Rent will be analyzed on a periodic and ongoing basis in order to identify any fluctuations and trends in the cost of utilities and services within Atlanta Housing Authority's jurisdiction. If such analysis reveals an extraordinary increase in the cost of utilities and services that will have a discernible impact on Participants, Atlanta Housing Authority will revise the Utility Allowance Schedule and implement it within a reasonable time frame in order to preserve housing affordability for Participants. Such ongoing analysis notwithstanding, Atlanta Housing Authority will conduct a comprehensive review of the cost of utilities and services on an annual basis and issue a Utility Allowance Schedule each calendar year in accordance with the Operating Procedures.

ARTICLE FOUR. MINIMUM RENT

1. Participants must pay a minimum rent of $125, or such other amount approved by Atlanta Housing Authority.

2. The minimum rent requirement does not apply to Participants, in which all household members are either elderly and/or disabled.

3. Generally, Atlanta Housing Authority does not expect that the establishment of a new minimum rent will create a hardship since no such rent initiatives will go into effect without providing advance notice. Even so, a Participant who has previously paid one or more months of rent but is unable to pay the minimum rent, due to extraordinary financial distress, may request hardship consideration.

   A. A hardship may exist when any one of the following circumstances is present: (i) the family has lost eligibility for (through no fault of the family) or is waiting eligibility determination for a Federal, State or local assistance program; (ii) the income of the family has decreased because of extraordinary changed circumstances, including loss of employment (through no fault of the family); (iii) although the family is diligently seeking to increase the family's income, the increase is not yet sufficient to fully pay the minimum rent; or (iv) such other extraordinary circumstances as Atlanta Housing Authority may determine.

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B. Atlanta Housing Authority shall promptly investigate any request for hardship and take appropriate actions based on whether a hardship is established and the family is otherwise complying with its obligations under an approved economic independence program and the planning documents formulated for the family. Such actions may include, but not be limited to:

i. Temporary suspension of the entire minimum rent under such terms as Atlanta Housing Authority shall direct. Such suspensions shall not last greater than ninety (90) days unless otherwise extended upon the written request of the Participant household based on verifiable circumstances reasonably affecting the Participant household's ability to pay the minimum rent. The period of the temporary suspension may be extended by the Atlanta Housing Authority after supervisory review and documented approval of the request;

ii. Accelerated enrollment in one of Atlanta Housing Authority's approved economic independence program components;

iii. Referral to third party agencies who assist participants with the payment of rent; and

iv. Such other actions as Atlanta Housing Authority shall direct.

C. The Participant household will <u>not</u> be required to pay minimum rent arrearages that accumulated during the entire period of an approved temporary suspension of the minimum rent as set forth in paragraph B above.

<u>ARTICLE FIVE.</u> ELDERLY INCOME DISREGARD

Atlanta Housing Authority has created an Elderly Income Disregard program. If an Elderly Participant, whose sole source of income is Social Security, SSI, or other fixed annuity pension and retirement plan income (Annual Fixed Income), becomes employed on a temporary, part-time, or other limited basis which does not result in the discontinuance of the Elderly Participant's Annual Fixed Income, the Elderly Participant's employment income will not be utilized in calculating annual income, and will be permanently disregarded thereafter. Such Elderly Participants will still be expected to pay the Income Adjusted Rent based on the Annual Fixed Income and any adjustments to the Annual Fixed Income.

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ARTICLE SIX. STANDARD INCOME DEDUCTIONS AND ASSET DETERMINATIONS

Atlanta Housing Authority, 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. The Atlanta Housing Authority Board of Commissioners must approve the schedule of Standard Income Deductions and any changes to the treatment of assets prior to implementation.

PART V – SUBSIDY STANDARDS

ARTICLE ONE. VOUCHER SIZE

1. The size of the rental housing unit that a Participant may lease under the Program is based on the number of bedrooms Atlanta Housing Authority has approved for the Participant's Voucher ("Voucher Size").

2. A Participant may not lease a rental housing unit that has more bedrooms than the Voucher Size unless approved by Atlanta Housing Authority. In the event Atlanta Housing Authority approves a Participant's request for a change in the Voucher Size, a new Voucher with the approved Voucher Size will be issued to the Participant.

3. To avoid overcrowding and the conditions that may arise from overcrowding, the Voucher Size of the Voucher issued to each eligible Participant will be determined in accordance with Operating Procedures based on the verifiable needs of the Participant household. A variety of factors, including, but not limited to, the number of people in the household, the age and gender of household members, special needs and reasonable accommodations requests, will be considered in determining Voucher Size.

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ARTICLE TWO. EFFECT OF LIVE-IN AIDE ON VOUCHER SIZE

One additional bedroom may be added to increase the Voucher Size when it is determined that a Live-in Aide that is essential for the care and support of an elderly or disabled Participant or household member will reside in the assisted unit with the elderly or disabled Participant or household member, but only after the need for a Live-In Aide has been certified by a medical professional and approved by Atlanta Housing Authority in accordance with the Operating Procedures.

PART VI – ALIGNMENT OF AHA PAYMENT STANDARDS WITH MARKET RENTS

ARTICLE ONE. MTW AUTHORIZATION

1. The MTW Agreement recognizes the spirit and intent of Atlanta Housing Authority's overarching goal of being a superior provider of affordable housing that will expand, improve and diversify Atlanta Housing Authority's influence on the affordable housing market and promote and support Participant self sufficiency.

2. In establishing Atlanta Housing Authority's Housing Choice Tenant-Based Program, the provisions of the MTW Agreement authorize Atlanta Housing Authority to determine reasonable contract rents and increases to such rents, rent reasonableness methodologies and adjustments to the payment standards.

3. Atlanta Housing Authority, in its discretion and pursuant to the MTW authorizations as summarized in this Article One, may explore, establish and implement different rent structures to further align the Program with private sector practices as well as to maximize the use of the subsidy resource to promote and support economic independence among Program Participants.

ARTICLE TWO. SETTING MARKET RENTS

1. Methodologies for setting market rents will utilize data derived from a variety of resources including, but not limited to, market rent studies (whether conducted by Atlanta Housing Authority or other public or private entities), HUD Fair Market Rent data from Atlanta and/or other comparable metropolitan markets, private sector databases, academic and other empirical studies, and regional economic forecasts.

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2. Atlanta Housing Authority will utilize market practices and other recognized methods for establishing market rent standards ("AHA Payment Standards") in order to determine the market contract rents that will be paid to Owners/Landlords. These standards will be used in place of the Fair Market Rents published annually in the Federal Register and will be used as the basis for establishing reasonable contract rents

ARTICLE THREE. AHA PAYMENT STANDARDS

1. AHA Payment Standards will be consistent with the objectives and determinations for setting market rents outlined in this Part VI with respect to aligning the Program with private sector practices and maximizing the use of the subsidy resource in support of strategies that promote the deconcentration of poverty and broader opportunities, enhance opportunities for the development of affordable housing, provide reasonable accommodation for disabled and elderly Participants, and provide for the sustainability of the Program.

2. Atlanta Housing Authority, in its discretion, will establish, implement and publish a Schedule of AHA Payment Standards for each submarket area within its jurisdiction or a Schedule of Payment Standards applicable to a broader area in support of portability initiatives.

3. Atlanta Housing Authority, in its discretion, may amend the AHA Payment Standards based on changing market conditions.

4. The procedures for implementing the AHA Payment Standards will be outlined in the Operating Procedures.

5. Exceptions to the AHA Payment Standards may be granted on a case-by-case basis with director-level or above approval based on the quality of the housing regardless of submarket, the location of the housing with respect to its proximity to revitalization activities, a reasonable accommodation request, and other reasonable requests related to achieving Atlanta Housing Authority's goals. The procedures for granting exceptions will be included in the Operating Procedures.

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ARTICLE FOUR. DECONCENTRATION

1. Atlanta Housing Authority's policies regarding AHA Payment Standards and Setting Market Rents support effective strategies for the deconcentration of poverty by providing Participants with meaningful and broader housing opportunities in accessing quality affordable housing.

2. Atlanta Housing Authority has an established policy that no more than forty percent (40%) of the units in a multifamily community will be assisted under Section 8 and/or Section 9 of the United States Housing Act of 1937, as amended, unless (i) the multifamily community has been designated as housing for Elderly Families and/or Disabled Families; or (ii) the multifamily community was built or substantially rehabilitated for occupancy by Elderly Families and/or Disabled Families.

3. Atlanta Housing Authority has an established policy that up to 100% of the units may be assisted under Section 8 and/or Section 9 of the United States Housing Act of 1937, as amended, in a multifamily community that has been designated as housing for Elderly Families and/or Disabled Families or was built or substantially rehabilitated for occupancy by Elderly Families and/or Disabled Families.

4. Atlanta Housing Authority, in its discretion, may develop a deconcentration strategy that would limit the percentage of Program Participants in designated census tracts in the City of Atlanta with the goal and intent of limiting occupancy in areas with high poverty concentrations.

PART VII – VOUCHER ISSUANCE

ARTICLE ONE. FAMILY BRIEFINGS

Applicants and Participants are required to attend an information briefing in order to receive a Voucher. The purpose of the briefing is to inform and educate Applicants and Participants regarding Program procedures, obligations and housing opportunities. The briefing will be conducted in accordance with the Operating Procedures.

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ARTICLE TWO. TERM OF VOUCHER ISSUANCE

Vouchers are issued to Applicants and Participants for a reasonable period of time in accordance with the Operating Procedures. Extensions to the term of the Voucher may be granted on a case-by-case basis with director-level or above approval based on relocation activities, reasonable accommodation requests, and other reasonable requests related to an Atlanta Housing Authority special or strategic initiative. The procedures for granting extensions will be included in the Operating Procedures.

ARTICLE THREE. TRANSFER OF ASSISTANCE

1. An Applicant or Participant cannot transfer her/his Voucher to another person or family. There is no expressed nor implied right that permits or entitles the selective transfer of a Voucher that was issued to an Applicant or Participant for her/his exclusive use as head-of-household on behalf of an assisted household.

2. If the Voucher holder, as the head-of-household of a housing unit assisted under the Program, abandons the household or is involuntarily removed from the household, Atlanta Housing Authority will determine the disposition of the Voucher in accordance with the Operating Procedures.

PART VIII – INTER-JURISDICTIONAL COOPERATION

ARTICLE ONE. COOPERATIVE AGREEMENTS

Atlanta Housing Authority will seek to establish cooperative agreements and similar arrangements between and among other housing agencies in other jurisdictions administering the Housing Choice Tenant-Based Program with respect to Voucher portability relating to eligibility, inspections, program requirements, fee sharing, billing and other arrangements that would promote and benefit inter-jurisdictional cooperation.

ARTICLE TWO. PORTABILITY

1. Voucher portability procedures, processes and general administrative practices are set forth in the Operating Procedures.

2. Voucher portability will generally follow the applicable HUD rules and regulations unless modified by an inter-jurisdictional cooperative agreement and applicable authorizations under Atlanta Housing Authority's MTW Agreement.

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3. Atlanta Housing Authority will require Participants porting to other jurisdictions to comply with Atlanta Housing Authority's CATALYST requirements, including the work requirement, including the training and program participation components. Atlanta Housing Authority may, at its discretion, waive such requirements for Participants where Atlanta Housing Authority determines that it is not feasible to administer program compliance for such Participants.

PART IX – INSPECTIONS

ARTICLE ONE. QUALITY UNITS

1. Atlanta Housing Authority established and may amend enhanced local standards ("AHA Local Inspection Standards") periodically to ensure that assisted units offer Participants quality housing in healthy communities. Factors such as levels of concentrated poverty, neighborhood crime, proximity to good neighborhood schools, access to public transportation, and access to retail businesses, among other factors, will be considered. Unit, site, and neighborhood conditions must continue to meet AHA Local Inspection Standards for as long as the assisted unit remains on the Program. It is the goal of the Program to provide opportunities for all Participants to reside in units in neighborhoods that promote and enhance educational and employment goals, good citizenship, and peaceful and cooperative community living.
2. It is an Atlanta Housing Authority policy to recruit Owners/Landlords with quality housing units to participate in the Program. Conversely, it is also the policy of Atlanta Housing Authority to disapprove marginal housing units for participation in the Program.

ARTICLE TWO. PROGRAM MARKETING AND OUTREACH

Atlanta Housing Authority will continue to educate the public about the Program and to foster successful relationships throughout human services organizations, local and state governments, and the business community in order to ensure the availability of quality affordable housing units and family self-sufficiency opportunities for Program participants. This effort includes outreach activities to Owners/Landlords with quality housing units.

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ARTICLE THREE. FREQUENCY OF INSPECTIONS

To ensure ongoing compliance with the AHA Local Inspection Standards, Atlanta Housing Authority will inspect all units assisted under the Program prior to occupancy, annually and under special circumstances related to health and safety issues and quality assurance measures in accordance with the procedures, processes and general administrative practices set forth in the Operating Procedures.

PART X – BUSINESS RELATIONSHIP BETWEEN ATLANTA HOUSING AUTHORITY AND OWNERS/LANDLORDS

ARTICLE ONE. BUSINESS RELATIONSHIP WITH OWNERS/LANDLORDS

The Housing Assistance Payments Contract or any successor agreement that Atlanta Housing Authority may develop and implement pursuant to its authorizations under the MTW Agreement is the controlling agreement that defines the business relationship between Atlanta Housing Authority and Owners/ Landlords.

ARTICLE TWO. BUSINESS RELATIONSHIP PROGRAM PROCEDURES

Atlanta Housing Authority's Program procedures governing the conduct of the business relationship between Atlanta Housing Authority and Owners/Landlords are set forth in various written communications and guidelines as set forth and directed by the Operating Procedures.

PART XI – REEXAMINATIONS

ARTICLE ONE. REEXAMINATION POLICY

Atlanta Housing Authority will reexamine the income, family composition and program compliance of each Participant on a periodic basis in accordance with the authorizations under the MTW Agreement and as set forth in the Operating Procedures.

ARTICLE TWO. REEXAMINATION PROGRAM PROCEDURES

Atlanta Housing Authority's Program procedures governing the conduct of reexaminations and Participant obligations and responsibilities are set forth in various written communications and guidelines as set forth and directed by the Operating Procedures.

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PART XII - TERMINATIONS

ARTICLE ONE. LEASE TERMINATION

Procedures, processes and general administrative guidelines governing lease terminations and the resulting termination of the Housing Assistance Payments Contract are set forth in the Operating Procedures.

ARTICLE TWO. PROGRAM MOVE

A Participant may give written notice to move from a unit assisted under the Program pursuant to the terms of the lease between the Participant and the Owner/Landlord and the Participant's obligations under the Program ("Program Move"). The procedures, processes and general administrative guidelines governing Program Moves are set forth in the Operating Procedures. Atlanta Housing Authority may initiate a Program Move due to Owner/Landlord non-compliance with Program requirements; requests for reasonable accommodations; victim protection under the Violence Against Women Act; relocation activities or for other strategic reasons set forth in the Operating Procedures.

ARTICLE THREE. DENIAL AND TERMINATION OF ASSISTANCE

1. Atlanta Housing Authority may deny admission to Applicants or terminate housing assistance benefits of Participants if they or any household member are or have been engaged in criminal activity that could reasonably be expected to indicate a threat to the health, safety or welfare of others.

2. OFFENSES SPECIFICALLY IDENTIFIED BY HUD: Pursuant to 24 CFR § 982.353, Applicants may be denied admission if any member of the household:

   A. Has been evicted from federally assisted housing for drug related criminal activity within the three year period preceding application;

   B. Is currently engaging in the illegal use of drugs;

   C. Has ever been convicted of drug-related criminal activity for manufacture or production of methamphetamine on the premises of federally assisted housing;

   D. Is subject to a lifetime registration requirement under a state sex offender registration program; or

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E. Is abusing or demonstrates a pattern of abuse of alcohol that may threaten the health, safety, or right to peaceful enjoyment of the premises by other residents.

3. VIOLENT OR DRUG-RELATED OFFENSES

Applicants may be denied admission and Participants may be subject to termination of housing subsidy benefits if any member of their households have been convicted of, arrested or under an outstanding warrant for, or reasonably believed to be engaged in any Violent or Drug-Related Offenses. Examples of Violent or Drug-Related Offenses include, but are not limited to the following:

A. Homicide, Murder, Voluntary manslaughter;

B. Rape, Sexual Battery, other Aggravated Sex-Related Crimes;

C. Child Molestation, Child Sexual Exploitation;

D. Drug Charges;

E. Kidnapping, False Imprisonment;

F. Terrorism;

G. Arson;

H. Possessing, Transporting or Receiving Explosives or Destructive Devices with the Intent to Kill, Injure, Intimidate, or Destroy;

I. Assault and Battery (Simple and Aggravated);

J. Trafficking, Distribution, Manufacture, Sale, Use, or Possession of Illegal Firearms;

K. Carjacking;

L. Robbery;

M. Hate Crimes;

N. Criminal Damage to Property Endangering Life, Health and Safety;

O. Aiding and Abetting in the Commission of a Crime Involving Violence; and

P. Other Violent or Drug-Related Offenses that may *Pose a Threat to Public Health and Safety*.

4. OTHER CRIMINAL OFFENSES (Not Violent or Drug-Related)

Applicants may be denied admission and Participants may be subject to termination if any member of their households have, within the five year period preceding application or at any time during program participation, been convicted of, arrested or under an outstanding warrant for, or reasonably believed to be engaged in any other criminal offenses that do not involve violence or drugs. Examples of Other Criminal Offenses (not violent or drug related) include, but are not limited to the following:

A. Child Neglect;

B. Disorderly Conduct;

C. Abuse or Pattern of Abuse of Alcohol (to the extent such abuse poses a threat to the health, safety, or peaceful enjoyment of the premises by other residents);

D. Motor Vehicle Theft;

E. Burglary. Larceny, Receiving Stolen Goods;

F. Prostitution and Solicitation of Prostitution;

G. Vandalism; and

H. Other Offenses that may Pose a Threat to Public Health and Safety but do not involve Violence or Drugs.

5. APPLICANT/PARTICIPANT RESPONSE TO ADVERSE CRIMINAL HISTORY INFORMATION DECISIONS

Based on adverse criminal history information gathered during the screening process, Paragraphs 2, 3, and 4 of this Article set forth the presumptions that Atlanta Housing Authority is entitled to rely upon when denying admission to Applicants and terminating the contracts of Participants who fall within the scope of this Article.

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Applicants and Participants will be afforded the opportunity to prove, with the burden of proof resting with the Applicant or Participant that the provisions under Paragraphs 2, 3, and/or 4 do not apply to the subject Applicant/Participant.

6. OTHER DENIAL OF ASSISTANCE APPLICABLE TO APPLICANTS PARTICIPANTS

In addition the causes for termination outlined in Sections 1-5 of this Article Two, Applicants and Participants can be denied assistance for the following reasons.

A. An Applicant or Participant that owes rent or other amounts to Atlanta Housing Authority or to another housing agency in connection with Program.

B. An Applicant or household member, either of whom being a former Program Participant or former public housing resident, who failed to reimburse Atlanta Housing Authority or another housing agency for overpaid assistance or underpaid rent or for any outstanding charges owed to an Owner/Landlord under an assisted lease paid by Atlanta Housing Authority or another housing agency.

C. An Applicant or Participant who is not in compliance with this Statement of Housing Choice Policies.

ARTICLE FOUR. OTHER TERMINATIONS OF HOUSING ASSISTANCE PAYMENTS CONTRACTS AND PARTICIPANT ASSISTANCE

1. Atlanta Housing Authority may terminate a Housing Assistance Payments Contract if the Owner/Landlord is not in compliance with the terms and conditions of the Housing Assistance Payments Contract.

2. Atlanta Housing Authority may deny or terminate assistance if Atlanta Housing Authority has reason to believe that a Participant household member has failed to abide by Program rules, regulations, or family obligations, regardless of whether the household member has been arrested or convicted. Atlanta Housing Authority shall have the discretion to consider all of the circumstances in each case, including the seriousness of the offense, if the violation is a first offense or a pattern of behavior, the extent of participation by the household member, and the effects that denial or termination would have on the other members of he Participant household not involved in the prescribed activity.

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ARTICLE FIVE. TERMINATION OF ASSISTANCE NOTIFICATION

If Atlanta Housing Authority deems it necessary to terminate assistance, Atlanta Housing Authority will give both the Participant and the Owner/Landlord written termination notices in accordance with the Operating Procedures.

ARTICLE SIX. INFORMAL REVIEWS AND INFORMAL HEARINGS

1. Applicants may exercise the right to an Informal Review regarding certain adverse actions that may result in the denial, significant reduction or termination of housing subsidy benefits. Requests for an Informal Review must be made in writing within ten (10) business days from the date of the notice of ineligibility or denial of assistance from the Atlanta Housing Authority. The Informal Review will be conducted by a person appointed by Atlanta Housing Authority who is neither the person who made or approved the decision under review nor the subordinate of such person. Both the Applicant and Atlanta Housing Authority will have the opportunity to present evidence at the Informal Review. An Informal Review decision shall be provided in writing to the Applicant within fifteen (15) business days from the date of the Informal Review. Requests for Informal Reviews, supporting documentation, and a copy of the final decision shall be retained in the applicant's file.
2. Participants may exercise the right to an Informal Hearing regarding certain adverse actions that may result in a denial, significant reduction or termination of housing subsidy benefits. Requests for an Informal Hearing must be made in writing within ten (10) business days from the date of the notice of denial or termination of assistance from the Atlanta Housing Authority. The Informal Hearing will be conducted by a person appointed by Atlanta Housing Authority who is neither the person who made or approved the decision under review, nor the subordinate of such person. Both the Participant and Atlanta Housing Authority will have the opportunity to present evidence at the Informal Hearing. An Informal Hearing decision shall be provided in writing to the Participant within fifteen (15) business days from the date of the Informal hearing. Requests for Informal Hearings, supporting documentation, and a copy of the final decision shall be retained in the Participant's file.
3. Applicants and Participants with disabilities may request reasonable accommodation in order to participate in the Informal Review/Informal Hearing process, as applicable.

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PART XIII – SPECIAL PROGRAMS

ARTICLE ONE. SPECIAL PROGRAMS POLICY

Atlanta Housing Authority, in its discretion, and as a policy matter may develop special programs and initiatives utilizing the regulatory relief and authorizations granted Atlanta Housing Authority under the MTW Agreement that address an identified need and support Atlanta Housing Authority's Vision, Mission and Guiding Principles.

PART XIV - RESPONSE TO FEDERALLY DECLARED DISASTERS

In order to respond to federally declared disasters and other federally declared emergencies Atlanta Housing Authority may provide disaster or other emergency relief utilizing Vouchers on a funding availability and resource allocation basis.

ARTICLE ONE. AGENCY-WIDE DISASTER OR OTHER EMERGENCY RELIEF PLANS

1. The President and Chief Executive Officer is authorized to develop an agency-wide disaster or other emergency relief plan to address the needs arising from a disaster or other emergency in a strategic, meaningful, and effective manner pursuant to applicable rules, regulations, emergency legislation, and Executive Orders.

2. The President and CEO is further authorized to take any action that the President and CEO may deem necessary and appropriate pursuant to federal disaster relief authorizations applicable to housing programs within the scope of the resources available to Atlanta Housing Authority, and to waive Atlanta Housing Authority's administrative policies governing the Program related to intake procedures including but not limited to establishing a preference for disaster victims on waiting lists for the Program, rent collections, subsidy payments, work program compliance, and other related and relevant administrative policies.

3. The President and CEO will provide the Board of Commissioners with a full report on a disaster or emergency relief plan implemented pursuant to this Article Seven.

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PART XV – PROJECT BASED RENTAL ASSISTANCE

ARTICLE ONE. PROJECT BASED RENTAL ASSISTANCE POLICY

Project-Based Rental Assistance, a major business plan priority of Atlanta Housing Authority, was developed pursuant to MTW authorizations for project-basing housing assistance under Section 8 of the 1937 Housing Act, as amended.

1. Project Based Rental Assistance, as a business plan component, is administered independent of and separate from the Housing Choice Tenant-Based Voucher Program.

2. Atlanta Housing Authority will not enter into Housing Assistance Payments Contracts for Housing Choice Tenant-Based Vouchers in a property that is under an executed Project Based Rental Assistance Agreement or a written commitment to enter into a Project Based Rental Assistance Agreement.

3. The implementation and administration of Project Based Rental Assistance, including site-based administration of all program activities by the owner entity's professional management agent, are set forth in separate operating procedures for Project Based Rental Assistance.

PART XVI – HOMEOWNERSHIP POLICY

ARTICLE ONE. AUTHORIZATION

The Housing Choice Homeownership Program was first authorized under Section 555 of the Quality Housing and Work Responsibility Act of 1998. Pursuant to the statutory and regulatory relief afforded Atlanta Housing Authority under its MTW Agreement, Section VI.A, paragraph 22 of the Statement of Authorizations authorizes Atlanta Housing Authority to determine the structure, terms and implementation of any homeownership program using Housing Choice Program Vouchers. Accordingly, Atlanta Housing Authority may use Housing Choice Program Vouchers in implementing and administering initiatives to create and promote homeownership opportunities that are consistent with Atlanta Housing Authority's guiding principles and Business Plan priorities.

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4. The Housing Choice Homeownership Program will be implemented and administered independent of and separate from the Housing Choice Tenant-Based Voucher Program by a division of the Atlanta Housing Authority designated by the President and Chief Executive Officer.

5. The division designated by the President and Chief Executive Officer is responsible for developing the structure, terms and written procedures for the implementation and ongoing administration of the Housing Choice Homeownership Program in accordance with the authorizations afforded Atlanta Housing Authority under its MTW Agreement.

END

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Appendix R: Public Review and Plan Changes

Public Review

AHA's Fiscal Year 2010 Moving to Work (MTW) CATALYST Implementation Plan is the product of an inclusive and comprehensive annual planning process involving numerous hours of planning and consultation with AHA's Board of Commissioners, AHA's Senior Management team, Resident Association presidents, AHA Advisory Board groups, Public Housing Assisted residents, Housing Choice participants, AHA employees, the Georgia Law Center for the Homeless, Atlanta Legal Aid, local political and government officials and other members of the public. AHA provided notice of the availability of the draft FY 2010 Plan to its stakeholders, clients and staff; provided draft copies of the Implementation Plan for feedback to many of these stakeholders; and posted the draft Implementation Plan on its website. The comment and review period for the Plan was February 19 through March 20, 2009. AHA also conducted a number of stakeholder briefings providing an overview of key components of the Plan.

On Thursday, March 12, 2009, AHA held a Public Hearing to present its Implementation Plan, *Statement of Corporate Policies Governing the Leasing and Residency of Assisted Apartments*, and *Administrative Plan Governing the Housing Choice Voucher Program* (now referred to as the Statement of Policies Governing the Housing Choice Tenant-Based Program) to receive comments from residents, participants, and the general public. The Public Hearing was held at the Loudermilk Conference Center, 40 Courtland Avenue, Atlanta, Georgia, where approximately 100 individuals attended. Notice of the FY 2010 Annual Plan availability and Public Hearing was posted in the following newspaper publications on specific dates:

Atlanta Journal Constitution
February 15, 2009
March 8, 2009

The Atlanta Daily Word
February 19, 2009
March 5, 2009

Mundo Hispanico
February 19, 2009
March 8, 2009

Fulton County Daily Report
February 23, 2009

AHA mailed a postcard of notification to all AHA-assisted families informing them of the Annual Plan availability and Public Hearing and offered public transportation reimbursement (or transportation assistance for reasonable accommodation requests) to attend the Public Hearing. Additionally, notices were posted in AHA's Affordable Communities regarding the Plan availability and public hearing and a copy of the draft plan

was available to residents in the property management office. The Public Hearing notice was made available in several languages: English, Spanish, Mandarin, German, Russian and Korean. Comments and dialogue were communicated at the consultation meetings and Public Hearing. AHA has considered, appropriately addressed or responded to remarks or questions regarding its Implementation Plan, or other AHA matters.

Plan Changes

Moving forward, AHA may make changes to the Implementation Plan without a Public Hearing or resident consultation provided that such changes do not constitute a "substantial deviation" or "significant amendment or modification." A "substantial deviation" or "significant amendment or modification" to the Implementation Plan is defined as changes, modifications, or amendments that materially and significantly modify AHA's Business Plan goals or priority Activities. A change in AHA's objectives or strategies in reaching those goals will not be considered a "substantial deviation" or "significant amendment or modification."

Appendix S: Submissions Required for Receipt of Funds

HUD no longer requires a submission from AHA to request Housing Choice funds and AHA has submitted the 2009 Low Rent Operating Subsidy Calculation to the Atlanta Field Office for review. AHA cannot submit a request for Capital Fund Program (CFP) funds for FY 2010 since HUD has not yet released the amount of the 2009 grant award. AHA will submit the required amendments to the CFP Annual Contributions Contract (ACC) and Performance and Evaluation reports to HUD as soon as HUD provides the funding levels.

Appendix T - Local Asset Management Program

Background and Introduction

The Amended and Restated Moving to Work Agreement, effective as of November 13, 2008, as further amended by that certain Second Amendment to the Moving to Work Agreement, effective as of January 16, 2009 authorizes AHA to design and implement a Local Asset Management Program for its Public Housing Program and describe such program in its Annual MTW Implementation Plan. The term "Public Housing Program" means the operation of properties owned or units in mixed-income communities subsidized under Section 9 of the U.S. 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 Local Asset Management Program shall include a description of how it is implementing project-based property management, budgeting, accounting, and financial management and any deviations from HUD's asset management requirements. Under the First Amendment to the MTW Agreement, AHA agreed to describe its cost accounting plan as part of its Local Asset Management Program including how the indirect cost fee for service rate is determined and applied.

Project-Based Approach for Public Housing Program

AHA maintains a project-based management approach by decentralizing property operations to each property and by contracting with private management companies to professionally manage each of the AHA owned properties under the Public Housing Program. Project level budgeting and accounting is maintained for these properties. In addition, each mixed-income, mixed-financed 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. AHA maintains a separate budget and accounting for the operating subsidy paid to the owners of these communities, but does not maintain the accounting for property operations as AHA does not own or operate these properties.

Identification of Cost Allocation Approach

AHA approached its cost allocation plan with consideration to the entire operation of AHA, 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 consideration to the entire operation of the Agency. This cost allocation plan addresses the entire AHA operation as well as the specific information required for the MTW Program.

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

Appendix T - Local Asset Management Program

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 Local Asset Management Program are used for determining direct and indirect costs charged to the cost objectives.

Definitions:

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

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

Indirect Costs – Indirect costs are those: (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 results 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 cost to be allocated to the benefitted cost objectives.

Indirect Cost Fee for Service Rates – Fee for Service Rates are 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 – A cost base is the 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. 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.

Appendix T - Local Asset Management Program

AHA Cost Objectives

AHA has identified the following cost objectives:

Direct Cost:

MTW Program - MTW Program and 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 AHA's MTW Agreement and Annual MTW Implementation Plan.

Revitalization Program – The Revitalization Program includes the development related activity funded from HOPE VI and other local funds. Generally, AHA will capture costs by development and will include the ability to track charges to specific funding sources.

Special Purpose Housing Choice Tenant-based Vouchers – Special Purpose Vouchers include, but are not limited to, the Family Unification Program vouchers, and the 1-year and 5-year Mainstream vouchers.

American Recovery and Reinvestment Act (ARRA) Grant – The ARRA grant is a one-time grant which will be use for demolition or rehabilitation of existing AHA-owned Public Housing properties.

Other Federal, State and Local Awards – AHA may be the recipient of other Federal, State (CDBG) and local awards from time to time. Each of these awards will be a separate cost objective, as necessary.

Non Federal Programs – This relates to entrepreneurial activities, Affiliate/Component Units, Georgia HAP, and the Mark-to-Market program that will be cost objectives.

Appendix T - Local Asset Management Program

AHA Direct Costs

AHA direct costs are defined in conjunction with the cost objectives defined in this Cost Allocation Plan. Under OMB Circular A-87, 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 vouchers and PBRA,
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. The Housing Choice Department costs for administering Housing Choice tenant based vouchers including inspection activities
7. Operating costs directly attributable to operating AHA-owned properties,
8. Capital improvement costs at AHA-owned properties, (this would not be expensed)
9. Operating subsidies paid to Mixed-income, mixed-finance (MIMF) communities,
10. The Real Estate Management Department costs associated with managing AHA-owned properties,
11. The Asset Management Department costs attributable to PBRA, HC tenant based vouchers, AHA-owned properties, mixed-income, mixed-finance properties and other AHA assets
12. The Relocation and Resident Services departments costs directly attributable to MTW Program activities,
13. Gap financing in qualified real estate transactions funded with MTW funds,
14. Acquisition costs funded from MTW funds,
15. Demolition, relocation and leasing incentive fees in repositioning AHA-owned real estate,
16. Homeownership activities for low-income families,
17. Real Estate Development and Acquisition Department costs associated with MTW funded development activity, homeownership initiatives, PBRA as a development tool, and acquisition activity, and
18. Any other activities that can be readily identifiable with delivering housing assistance to low-income families under the MTW Program.

AHA Direct Costs - *continued*

Revitalization Program direct costs include, but are not limited to:

1. Leasing incentive fees
2. Legal expenses
3. Professional services
4. Contract cost (case management)
5. Relocation
6. Extraordinary site work
7. Demolition
8. Other revitalization expenditures (such as homeownership mortgage assistance and down payment assistance)
9. Acquisitions
10. Program Administration
11. Investments (loans, grants, etc.)

Special Purpose Housing Choice Tenant-based Vouchers direct costs include, but are not limited to:

1. Housing assistance payments (HAP)
2. Program Administration Costs

American Recovery and Reinvestment Act (ARRA) Grant direct costs include, but are not limited to:

1. Demolition of AHA-owned Public Housing properties and related fees and costs
2. Rehabilitation of existing AHA-owned Public Housing properties and related fees and costs

Other Federal and State Awards direct cost include, but are not limited to:

1. Any cost identified for which the award is made. Such costs will be determined as AHA receives awards.

Non-Federal Programs direct costs are costs specifically incurred for such programs including but not limited to:

1. Legal expenses
2. Professional services
3. Utilities (gas, water, electric, other utilities expense)
4. Real estate taxes
5. Insurance
6. Bank charges
7. Staff training
8. Interest expense
9. Contract cost for CDBG
10. Any other costs required of a specific program, award or contract.

Appendix T - Local Asset Management Program

Direct Costs – Substitute System for Compensation of Personnel Services

In addition to the direct costs identified previously, AHA will allocate direct salary and wages based upon quantifiable measures (substitute system) of employee effort rather than timesheets. This substitute system is allowed under OMB Circular A-87 Attachment B Part 8 paragraph (h)(6). The substitute system allows AHA to more efficiently and effectively allocate direct costs on measures that are readily determined for each department. Those departments and measures will be re-evaluated periodically and updated as necessary. The departments and measures effective July 1, 2009 are listed below:

Business Unit / Department	Quantifiable Measure
Asset Management	Number or properties
Real Estate Development	Active revitalizations
Real Estate Management	Leased units
Housing Choice	Leased vouchers
Relocation	Impacted families
Resident services	Families served

AHA Fee for Service

AHA will establish a Fee for Service Rate based on the anticipated indirect cost 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 to be charged to each program. Based on current budget estimates, AHA projects the indirect cost fee to be approximately 10% of total direct costs. This percentage will be finalized once the FY 2010 budget is complete.

Limitation on indirect cost or administrative costs – AHA recognizes that there may be limitations on the amount of administrative or indirect costs that can be charged to specific grant awards. Should such limitations prevent the charging of direct and indirect costs to a grant award, AHA will charge such costs to the remaining cost objectives as defined in the Local Asset Management Program.

AHA will begin accounting for costs under this Local Asset Management Program beginning July 1, 2009 and will begin reporting under the Financial Data Schedule (FDS) for its fiscal year ending June 30, 2010. Such reporting will include the reporting of property level financial information for those properties under the Public Housing Program.

Appendix T - Local Asset Management Program

Explanation of Differences

AHA has the ability to define direct costs differently than the standard definitions published in HUD's Financial Management Guidebook pertaining to the implementation of 24 CFR Part 990.

AHA is required to describe any differences between the Local Asset Management Program and HUD's asset management requirements in its Annual MTW Plan in order to facilitate the recording of actual property costs and submission of such cost information to HUD:

1. AHA decided to implement 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 AHA's comprehensive operation which includes other programs and business activities. AHA's MTW Program is much broader than Public Housing properties and includes activities not found in traditional HUD Programs. This Local Asset Management Program Plan addresses the entire AHA operation.

2. AHA defined its cost objectives at a different level than HUD's asset management system. Specifically, AHA defined the MTW Program as a cost objective which is consistent with the issuance of the MTW 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 in this Local Asset Management Program.

Civil Rights Certification	U.S. Department of Housing and Urban Development Office of Public and Indian Housing Expires 4/30/2011

Civil Rights Certification

Annual Certification and Board Resolution

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairman or other authorized PHA official if there is no Board of Commissioner, I approve the submission of the Plan for the PHA of which this document is a part and make the following certification and agreement with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:

The PHA certifies that it will carry out the public housing program of the agency in conformity with title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990, and will affirmatively further fair housing.

The Housing Authority of the City of Atlanta, Georgia
PHA Name

GA 006
PHA Number/HA Code

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)	
Name of Authorized Official **Cecil Phillips**	Title **Chairman, Board of Commissioners**
Signature	Date **March 31, 2009**

Annual Statement / Performance and Evaluation Report
Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF) Part 1: Summary

PHA Name	Grant Type and Number	Federal FY of Grant: 2009
The Housing Authority of the City of Atlanta, Georgia	Capital Fund Program Grant No: **GA06S006501-09** Replacement Housing Factor Grant No:	

☒ Original Annual Statement ☐ Reserve for Disasters/Emergencies ☐ Revised Annual Statement/Revision Number (__ ___)
☐ Performance and Evaluation Report for Program Year Ending ☐ Final Performance and Evaluation Statement

Line No.	Summary by Development Account		Total Estimated Cost Original	Total Estimated Cost Revised	Total Actual Cost Obligated	Total Actual Cost Expended
1	Total non-CFP Funds					
2	0110	Initial Budget	$23,921,251.00			
3	1406	Operations				
4	1408	Management Improvements Soft Costs				
5		Management Improvements Hard Costs				
6	1410	Administration	$2,657,917.00			
7	1411	Audit				
8	1415	Liquidated Damages				
9	1430	Fees and Costs		$2,671,743.00		
10	1440	Site Acquisition				
11	1450	Site Improvement		$1,264,545.00		
12	1460	Dwelling Structures		$13,038,335.00		
13	1465.1	Dwelling Equipment - Nonexpendable				
14	1470	Nondwelling Structure		$1,828,182.00		
15	1475	Nondwelling Equipment		$503,636.00		
16	1485	Demolition		$7,272,727.00		
17	1490	Replacement Reserve				
18	1492	Moving to Work Demonstration				
19	1495.1	Relocation Costs				
20	1499	Development Activities				
21	1502	Contingency				
22	Amount of Annual Grant (Sum of lines 2-19)		**$26,579,168.00**	**$26,579,168.00**	**$0.00**	**$0.00**
23	Amount of line 20 Related to LBP Activities					
24	Amount of line 20 Related to Section 504 Compliance					
25	Amount of line 20 Related to Security - Soft Costs					
26	Amount of line 20 Related to Security - Hard Costs					
27	Amount of line 20 Related to Energy Conservation Measures					
28	Collateratization Expenses or Debt Service					

Annual Statement / Performance and Evaluation Report

Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF)

Part II: Supporting Pages

PHA Name:	Grant Type and Nunber	Federal FY of Grant: 2009
The Housing Authority of the City of Atlanta, Georgia	Capital Fund Program Grant No: **GA06S006501-09** Replacement Housing Factor Grant No:	

Development Number/ Name HA-Wide Activities	General Description of Major Work Categories	Dev. Acct No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised	Funds Obligated	Funds Expended	
GA006000170								
Thomasville Heights								
	Fees and Costs - Design fees and construction management fees	1430		0	260,000	0.00	0.00	
	Demolition	1485		0	2,600,000	0.00	0.00	
GA006000200								
Hollywood Courts								
	Fees and Costs - Design fees and construction management fees	1430		0	121,836	0.00	0.00	
	Demolition	1485		0	1,218,364	0.00	0.00	
GA006000241								
Cosby Spear Towers								
	Fees and Costs - Design fees and construction management fees	1430		0	306,272	0.00	0.00	
	Site Improvements - Parking Lot, sidewalk and street repair as well as erosion control, landscaping and exterior recreation space enhancements	1450		0	55,455	0.00	0.00	
	Dwelling Structures/Major Systems - Improvements to building envelop, major systems and dwelling units to include energy efficiency improvements	1460		0	1,593,636	0.00	0.00	
	Common Areas - Lobby, common area and specialty function room renovations	1470		0	515,455	0.00	0.00	
	Non-Dwelling Equipment - Computers, common area equipment, laundry facility washers/dryers	1475		0	68,182	0.00	0.00	

Development Number/ Name HA-Wide Activities	General Description of Major Work Categories	Dev. Acct No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised	Funds Obligated	Funds Expended	
GA006000250								
Georgia Avenue								
	Fees and Costs - Design fees and construction management fees	1430		0	49,000	0.00	0.00	
	Site Improvements - Parking Lot, sidewalk and street repair as well as erosion control, landscaping and exterior recreation space enhancements	1450		0	95,455	0.00	0.00	
	Dwelling Structures/Major Systems - Improvements to building envelop, major systems and dwelling units to include energy efficiency improvements	1460		0	280,000	0.00	0.00	
	Common Areas - Lobby, common area and specialty function room renovations	1470		0	74,545	0.00	0.00	
	Non-Dwelling Equipment - Computers, common area equipment, laundry facility washers/dryers	1475		0	40,000	0.00	0.00	
GA006000280								
Bankhead Courts								
	Fees and Costs - Design fees and construction management fees	1430		0	345,436	0.00	0.00	
	Demolition	1485		0	3,454,364	0.00	0.00	
GA006000300								
Eastlake Highrise								
	Fees and Costs - Design fees and construction management fees	1430		0	222,364	0.00	0.00	
	Site Improvements - Parking Lot, sidewalk and street repair as well as erosion control, landscaping and exterior recreation space enhancements	1450		0	291,818	0.00	0.00	
	Dwelling Structures/Major Systems - Improvements to building envelop, major systems and dwelling units to include energy efficiency improvements	1460		0	1,499,091	0.00	0.00	
	Common Areas - Lobby, common area and specialty function room renovations	1470		0	172,727	0.00	0.00	
	Non-Dwelling Equipment - Computers, common area equipment, laundry facility washers/dryers	1475		0	40,000	0.00	0.00	

Development Number/ Name HA-Wide Activities	General Description of Major Work Categories	Dev. Acct No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised	Funds Obligated	Funds Expended	
GA006000430								
Juniper and Tenth Street								
	Fees and Costs - Design fees and construction management fees	1430		0	118,000	0.00	0.00	
	Dwelling Structures/Major Systems - Improvements to building envelop, major systems and dwelling units to include energy efficiency improvements	1460		0	220,909	0.00	0.00	
	Common Areas - Lobby, common area and specialty function room renovations	1470		0	421,818	0.00	0.00	
	Non-Dwelling Equipment - Computers, common area equipment, laundry facility washers/dryers	1475		0	37,273	0.00	0.00	
GA006000440								
Westminster								
	Fees and Costs - Design fees and construction management fees	1430		0	53,817	0.00	0.00	
	Dwelling Structures/Major Systems - Improvements to building envelop, major systems and dwelling units to include energy efficiency improvements	1460		0	457,273	0.00	0.00	
	Common Areas - Lobby, common area and specialty function room renovations	1470		0	35,455	0.00	0.00	
	Non-Dwelling Equipment - Computers, common area equipment, laundry facility washers/dryers	1475		0	45,455	0.00	0.00	

Development Number/ Name HA-Wide Activities	General Description of Major Work Categories	Dev. Acct No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised	Funds Obligated	Funds Expended	
GA006000450								
Peachtree Road								
	Fees and Costs - Design fees and construction management fees	1430		0	217,728	0.00	0.00	
	Site Improvements - Parking Lot, sidewalk and street repair as well as erosion control, landscaping and exterior recreation space enhancements	1450		0	261,818	0.00	0.00	
	Dwelling Structures/Major Systems - Improvements to building envelop, major systems and dwelling units to include energy efficiency improvements	1460		0	1,690,000	0.00	0.00	
	Common Areas - Lobby, common area and specialty function room renovations	1470		0	33,636	0.00	0.00	
	Non-Dwelling Equipment - Computers, common area equipment, laundry facility washers/dryers	1475		0	41,818	0.00	0.00	
GA006000470								
Cheshire Bridge								
	Fees and Costs - Design fees and construction management fees	1430		0	262,092	0.00	0.00	
	Site Improvements - Parking Lot, sidewalk and street repair as well as erosion control, landscaping and exterior recreation space enhancements	1450		0	82,727	0.00	0.00	
	Dwelling Structures/Major Systems - Improvements to building envelop, major systems and dwelling units to include energy efficiency improvements	1460		0	1,603,636	0.00	0.00	
	Common Areas - Lobby, common area and specialty function room renovations	1470		0	393,636	0.00	0.00	
	Non-Dwelling Equipment - Computers, common area equipment, laundry facility washers/dryers	1475		0	40,909	0.00	0.00	

Development Number/ Name HA-Wide Activities	General Description of Major Work Categories	Dev. Acct No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised	Funds Obligated	Funds Expended	
GA006000480								
Piedmont Road								
	Fees and Costs - Design fees and construction management fees	1430		0	143,091	0.00	0.00	
	Site Improvements - Parking Lot, sidewalk and street repair as well as erosion control, landscaping and exterior recreation space enhancements	1450		0	85,455	0.00	0.00	
	Dwelling Structures/Major Systems - Improvements to building envelop, major systems and dwelling units to include energy efficiency improvements	1460		0	1,051,818	0.00	0.00	
	Common Areas - Lobby, common area and specialty function room renovations	1470		0	84,545	0.00	0.00	
	Non-Dwelling Equipment - Computers, common area equipment, laundry facility washers/dryers	1475		0	39,091	0.00	0.00	
GA006000520								
Marian Road								
	Fees and Costs - Design fees and construction management fees	1430		0	145,818	0.00	0.00	
	Site Improvements - Parking Lot, sidewalk and street repair as well as erosion control, landscaping and exterior recreation space enhancements	1450		0	191,818	0.00	0.00	
	Dwelling Structures/Major Systems - Improvements to building envelop, major systems and dwelling units to include energy efficiency improvements	1460		0	1,209,091	0.00	0.00	
	Common Areas - Lobby, common area and specialty function room renovations	1470		0	17,273	0.00	0.00	
	Non-Dwelling Equipment - Computers, common area equipment, laundry facility washers/dryers	1475		0	40,000	0.00	0.00	

Development Number/ Name HA-Wide Activities	General Description of Major Work Categories	Dev. Acct No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised	Funds Obligated	Funds Expended	
GA006000530								
Hightower Manor								
	Fees and Costs - Design fees and construction management fees	1430		0	121,000	0.00	0.00	
	Dwelling Structures/Major Systems - Improvements to building envelop, major systems and dwelling units to include energy efficiency improvements	1460		0	1,139,091	0.00	0.00	
	Common Areas - Lobby, common area and specialty function room renovations	1470		0	32,727	0.00	0.00	
	Non-Dwelling Equipment - Computers, common area equipment, laundry facility washers/dryers	1475		0	38,182	0.00	0.00	
GA006000540								
Barge Road								
	Fees and Costs - Design fees and construction management fees	1430		0	102,197	0.00	0.00	
	Dwelling Structures/Major Systems - Improvements to building envelop, major systems and dwelling units to include energy efficiency improvements	1460		0	952,880	0.00	0.00	
	Common Areas - Lobby, common area and specialty function room renovations	1470		0	33,636	0.00	0.00	
	Non-Dwelling Equipment - Computers, common area equipment, laundry facility washers/dryers	1475		0	35,455	0.00	0.00	
GA006000560								
Martin Street Plaza								
	Fees and Costs - Design fees and construction management fees	1430		0	84,636	0.00	0.00	
	Site Improvements - Parking Lot, sidewalk and street repair as well as erosion control, landscaping and exterior recreation space enhancements	1450		0	200,000	0.00	0.00	
	Dwelling Structures/Major Systems - Improvements to building envelop, major systems and dwelling units to include energy efficiency improvements	1460		0	206,364	0.00	0.00	

Development Number/ Name HA-Wide Activities	General Description of Major Work Categories	Dev. Acct No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised	Funds Obligated	Funds Expended	
GA006000580								
Marietta Road								
	Fees and Costs - Design fees and construction management fees	1430		0	118,455	0.00	0.00	
	Dwelling Structures/Major Systems - Improvements to building envelop, major systems and dwelling units to include energy efficiency improvements	1460		0	1,134,545	0.00	0.00	
	Common Areas - Lobby, common area and specialty function room renovations	1470		0	12,727	0.00	0.00	
	Non-Dwelling Equipment - Computers, common area equipment, laundry facility washers/dryers	1475		0	37,273	0.00	0.00	
GA6-321								
Available Budget								
	Undistributed Funds	0110		23,921,251	0	0.00	0.00	
	Fees for Service	1410		2,657,917	0	0.00	0.00	
				26,579,168	26,579,168			

EXECUTIVE SUMMARY TO ITEM NO. EO-2

This resolution, if approved, would authorize The Housing Authority of the City of Atlanta, Georgia (AHA) to (i) execute the American Recovery and Reinvestment Act of 2009 (Recovery Act) Capital Fund Program Amendment to AHA's Consolidated Annual Contributions Contract (Recovery Act ACC Amendment), (ii) submit the Recovery Act ACC Amendment to the United States Department of Housing and Urban Development, (iii) execute and submit any additional agreements, amendments or other documents as necessary or advisable in order to accept and use Recovery Act funds including, but not limited to, the Recovery Act Capital Funds, (iv) accept the Recovery Act funds, and (v) use the Recovery Act funds for the projects, activities and initiatives set forth in AHA's Fiscal Year 2010 Moving To Work Annual Implementation Plan, subject to the limitations governing eligible priorities and activities under the Recovery Act and related regulatory guidance, and other related matters.

PREPARED FOR THE REGULAR MEETING
OF THE BOARD OF COMMISSIONERS TO BE HELD
MONDAY, MARCH 30, 2009

ITEM NO. EO-2:

To consider and act upon a resolution authorizing The Housing Authority of the City of Atlanta, Georgia (AHA) to (i) execute the American Recovery and Reinvestment Act of 2009 (Recovery Act) Capital Fund Program Amendment to AHA's Consolidated Annual Contributions Contract (Recovery Act ACC Amendment), (ii) submit the Recovery Act ACC Amendment to the United States Department of Housing and Urban Development, (iii) execute and submit any additional agreements, amendments or other documents as necessary or advisable in order to accept and use Recovery Act funds including, but not limited to, the Recovery Act Capital Funds, (iv) accept the Recovery Act funds, and (v) use the Recovery Act funds for the projects, activities and initiatives set forth in AHA's Fiscal Year 2010 Moving To Work Annual Implementation Plan, subject to the limitations governing eligible priorities and activities under the Recovery Act and related regulatory guidance, and other related matters.

EXPLANATION

On February 17, 2009, President Obama signed the American Recovery and Reinvestment Act of 2009 (Recovery Act). The Recovery Act includes measures to modernize infrastructure, enhance energy independence, expand educational opportunities, preserve and improve affordable health care, provide tax relief, and protect those in greatest need.

The Recovery Act includes a $4 billion appropriation of capital funds for local housing agencies to carry out capital improvements and other investment activities. The Recovery Act provides that approximately $3 billion of this $4 billion appropriation will be distributed through a capital fund formula and the remaining $1 billion will be distributed through a competitive process. The United States Department of Housing and Urban Development (HUD) has notified AHA that it will receive approximately $26.5 million pursuant to the capital fund formula that was used to calculate capital fund grants in 2008. AHA intends to compete for additional funds.

AHA must use Recovery Act funds on eligible activities described in AHA's Fiscal Year 2010 Moving To Work Implementation Plan (also referred to herein as the FY 2010 CATALYST Implementation Plan) (submitted for approval to this Board on March 30, 2009 after consultation with community stakeholders and a public hearing). The specific activities AHA intends to undertake with the Recovery Act funds are described in Exhibit EO-2-A. AHA must obligate 100% of the funds within one year of March 18, 2009, must expend at least 60% of funds within two years of such date, and must expend 100% of the funds within three years of such date.

In order to accept and use Recovery Act funds, HUD requires that AHA execute and submit the Recovery Act Capital Fund Program Amendment to AHA's Consolidated Annual Contributions Contract (Recovery Act ACC Amendment), submit a Recovery Act Capital Fund Annual Statement describing the specific activities AHA will undertake with the Recovery Act funds (as described in Exhibit EO-2-A) and submit a resolution from AHA's Board of Commissioners authorizing the acceptance and expenditure of the Recovery Act funds. Accordingly, AHA requests the Board of Commissioners to authorize the President and Chief Executive Officer and her designees or the Chairman or Vice Chairman of the Board of Commissioners, when required, to (i) execute the Recovery Act Capital Fund Program Amendment to AHA's Consolidated Annual Contributions Contract (Recovery Act ACC Amendment), (ii) submit the Recovery Act ACC Amendment to HUD, (iii) execute and submit any additional agreements, amendments or other documents as necessary or advisable in order to accept and use Recovery Act funds, including, but not limited to, the Recovery Act Capital Fund Annual Statement, (iv) accept the Recovery Act funds, and (v) use the Recovery Act funds for the projects, activities and initiatives set forth in AHA's Fiscal Year 2010 Moving To Work Annual Implementation Plan, subject to the limitations governing eligible priorities and activities under the Recovery Act and related regulatory guidance.

RESOLUTION

WHEREAS, on February 17, 2009, President Obama signed the American Recovery and Reinvestment Act of 2009 (Recovery Act);

WHEREAS, the Recovery Act includes measures to modernize infrastructure, enhance energy independence, expand educational opportunities, preserve and improve affordable health care, provide tax relief, and protect those in greatest need;

WHEREAS, the Recovery Act includes a $4 billion appropriation of capital funds for local housing agencies to carry out capital improvements and other investment activities;

WHEREAS, the Recovery Act provides that approximately $3 billion of this $4 billion appropriation will be distributed through a capital fund formula and the remaining $1 billion will be distributed through a competitive process;

WHEREAS, the United States Department of Housing and Urban Development (HUD) has notified AHA that it will receive approximately $26.5 million pursuant to the capital fund formula that was used to calculate capital fund grants in 2008;

WHEREAS, AHA intends to compete for additional funds;

WHEREAS, AHA must use Recovery Act funds on eligible activities described in AHA's Fiscal Year 2010 Moving To Work Implementation Plan (also referred to herein as the FY 2010 CATALYST Implementation Plan) (submitted for approval to this Board on March 30, 2009 after consultation with community stakeholders and a public hearing);

WHEREAS, the specific activities AHA intends to undertake with the Recovery Act funds are described in Exhibit EO-2-A;

WHEREAS, AHA must obligate 100% of the funds within one year of March 18, 2009, must expend at least 60% of funds within two years of such date, and must expend 100% of the funds within three years of such date;

WHEREAS, in order to accept and use Recovery Act funds, HUD requires that AHA execute and submit the Recovery Act Capital Fund Program Amendment to AHA's Consolidated Annual Contributions Contract (Recovery Act ACC Amendment), submit a Recovery Act Capital Fund Annual Statement describing the specific activities AHA will undertake with the Recovery Act funds (as described in Exhibit EO-2-A) and submit a resolution from AHA's Board of Commissioners authorizing the acceptance and expenditure of the Recovery Act funds; and

WHEREAS, accordingly, AHA requests the Board of Commissioners to authorize the President and Chief Executive Officer and her designees or the Chairman or Vice Chairman of the Board of Commissioners, when required, to (i) execute the Recovery Act Capital Fund Program Amendment to AHA's Consolidated Annual Contributions Contract (Recovery Act ACC Amendment), (ii) submit the Recovery Act ACC Amendment to HUD, (iii) execute and submit any additional agreements, amendments or other documents as necessary or advisable in order to accept and use Recovery Act funds, including, but not limited to, the Recovery Act Capital Fund Annual Statement, (iv) accept the Recovery Act funds, and (v) use the Recovery Act funds for the projects, activities and initiatives set forth in AHA's Fiscal Year 2010 Moving To Work Annual Implementation Plan, subject to the limitations governing eligible priorities and activities under the Recovery Act and related regulatory guidance.

NOW, THEREFORE, BE IT RESOLVED BY THE BOARD OF COMMISSIONERS OF THE HOUSING AUTHORITY OF THE CITY OF ATLANTA, GEORGIA, THAT:

1. The President and Chief Executive Officer and her designees are hereby authorized to execute the American Recovery and Reinvestment Act of 2009 (Recovery Act) Capital Fund Program Amendment to AHA's Consolidated Annual Contributions Contract (Recovery Act ACC Amendment), and any required documents, certifications or United States Department of Housing and Urban Development (HUD) forms related to the Recovery Act or the Recovery Act ACC Amendment, without further vote or approval of this Board. Any Recovery Act ACC Amendment and required documents,

certifications or HUD forms related to the Recovery Act ACC Amendment previously executed by the President and Chief Executive Officer are hereby ratified and approved.

2. Each of the Chairman or Vice Chairman of the Board of Commissioners, when applicable, and the President and Chief Executive Officer and her designees are authorized to submit the executed the Recovery Act ACC Amendment and such other required documents, certifications or forms to HUD with such changes, additions, corrections or amendments as she shall deem necessary or appropriate or as may be required by HUD, including, but not limited to, the Recovery Act Capital Fund Annual Statement, without further vote or approval of this Board. Any Recovery Act ACC Amendment and such other required documents, certifications or forms previously submitted to HUD by the President and Chief Executive Officer are hereby ratified and approved.

3. To the extent required by HUD, each of the Chairman or Vice Chairman of the Board of Commissioners is authorized to execute and submit any required documents, certifications or HUD forms related to the Recovery Act or the Recovery Act ACC Amendment, without further vote or approval of this Board.

4. The Board of Commissioners hereby accepts the Recovery Act funds on behalf of AHA and authorizes the President and Chief Executive Officer to accept and to use the Recovery Act funds for projects, activities and initiatives set forth in AHA's Fiscal Year 2010 CATALYST Implementation Plan, subject to the limitations governing eligible priorities and activities under the Recovery Act and related regulatory guidance.

5. The President and Chief Executive Officer and her designees are hereby authorized to implement the activities, projects and any policy changes necessary for the use of the Recovery Act funds.

6. All actions taken by AHA to date in connection with the intent of this resolution are hereby ratified and confirmed.

EXHIBIT EO-2-A
American Recovery and Reinvestment Act (ARRA)
Capital Formula Funding
as of March 27, 2009

Initial ARRA Funding

PMCO	Property	Site/Infrastructure	Building Envelope	Major Systems	Common Areas	Dwelling Units	Total
Habitat	Barge Rd	$ -	$ 934,000	$ 44,000	$ 76,000	$ 70,000	$ 1,124,000
	Hightower	$ -	$ 299,000	$ 2,000	$ 78,000	$ 952,000	$ 1,331,000
	Juniper	$ -	$ 13,000	$ 177,000	$ 555,000	$ 53,000	$ 798,000
	Marian	$ 211,000	$ 633,000	$ 88,000	$ 63,000	$ 609,000	$ 1,604,000
	Marietta	$ -	$ 243,000	$ 388,000	$ 55,000	$ 651,000	$ 1,337,000
	Westminster	$ -	$ 353,000	$ 150,000	$ 89,000	$ -	$ 592,000
	Total	**$ 211,000**	**$ 2,442,000**	**$ 849,000**	**$ 416,000**	**$ 2,835,000**	**$ 6,753,000**
IMS	Cheshire	$ 91,000	$ 1,250,000	$ 376,000	$ 528,000	$ 138,000	$ 2,383,000
	Peachtree	$ 303,000	$ 1,405,000	$ 316,000	$ 83,000	$ 138,000	$ 2,245,000
	Total	**$ 394,000**	**$ 2,655,000**	**$ 692,000**	**$ 611,000**	**$ 276,000**	**$ 4,628,000**
Lane	Cosby Spears	$ 61,000	$ 165,000	$ 205,000	$ 725,000	$ 1,383,000	$ 2,539,000
	East Lake	$ 343,000	$ 550,000	$ 161,000	$ 234,000	$ 938,000	$ 2,226,000
	Georgia Ave	$ 105,000	$ -	$ 66,000	$ 126,000	$ 242,000	$ 539,000
	Martin Street	$ 264,000	$ -	$ -	$ -	$ 227,000	$ 491,000
	Piedmont	$ 111,000	$ -	$ 178,000	$ 136,000	$ 979,000	$ 1,404,000
	Total	**$ 884,000**	**$ 715,000**	**$ 610,000**	**$ 1,220,000**	**$ 3,769,000**	**$ 7,198,000**
	Total	**$ 1,489,000**	**$ 5,812,000**	**$ 2,151,000**	**$ 2,247,000**	**$ 6,880,000**	**$ 18,579,000**

QLI Demolition Funding

PMCO	Property	Amount
Habitat	Bankhead	$ 2,500,000
	Herndon	$ 1,500,000
	Hollywood	$ 1,500,000
	Total	**$ 5,500,000**
IMS	Thomasville	$ 2,500,000
	Total	**$ 2,500,000**
	Total	**$ 8,000,000**

Atlanta Housing Authority