

ATLANTA HOUSING



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Vision

Healthy Mixed-Income Communities; Healthy Self-Sufficient Families.

Mission

Provide quality affordable housing in amenity-rich, mixed-income communities for the betterment of the community.

Goals

- **Quality Living Environments** – Provide quality affordable housing in healthy mixed-income communities with access to excellent quality-of-life amenities.
- **Self-Sufficiency** – (a) Facilitate opportunities for families and individuals to build economic capacity and stability that will reduce their dependency on subsidy and help them, ultimately, to become financially independent; (b) facilitate and support initiatives and strategies to support great educational outcomes for children; and (c) facilitate and support initiatives that enable the elderly and persons with disabilities to live independently with enhanced opportunities for aging well and to improve health and wellness for all residents.
- **Economic Viability** – Maximize AH's financial soundness and viability to ensure sustainability of its investments and portfolio of properties.

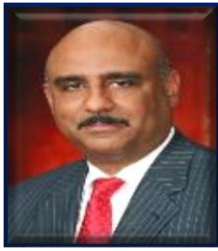
Guiding Principles

In approaching its work, regardless of the funding source, strategy, or programmatic initiative, AH applies the following guiding principles:

1. End the practice of concentrating low-income families in distressed and isolated neighborhoods.
2. Create healthy mixed-use, mixed-income (children-centered) communities using a holistic and comprehensive approach to assure long-term market competitiveness and sustainability of the community and to support excellent outcomes for families (especially children), with emphasis on excellent, high-performing neighborhood schools and high quality-of-life amenities, including first-class retail and green space.
3. Create mixed-income communities with the goal of creating market-rate communities with a seamlessly integrated affordable residential component.
4. Develop communities through public/private partnerships using public and private sources of funding and private sector expertise and real estate market principles.
5. Support AH-assisted families with strategies and programs that help them achieve their life goals, focusing on financial self-sufficiency and educational advancement of the children with expectations and standards for personal responsibility benchmarked for success.

A Message from Atlanta Housing Board

Welcome to the Fiscal Year 2021 (FY21) Atlanta Housing Moving-to-Work (**MTW**) Plan.



On behalf of the Atlanta Housing Board of Commissioners, I extend our appreciation for your interest in the impactful work that this agency does to serve the citizens of Atlanta.

This strategic plan reveals our primary objectives, which are to create new housing opportunities and sustain existing ones. Preserving affordable housing in Atlanta continues to be our top priority, though this is no easy task, as developers target higher-income earners seeking luxury living. Our city is changing and growing, yet lower-income individuals and families are being left behind struggling, to find a home that they can afford.

The Board enthusiastically supports concepts delivered in this Plan and have total faith in the very competent AH staff, who is tasked with its execution. In fact, the Board is very appreciative of Joy Fitzgerald, who came out of retirement to serve as AH's interim president and CEO while the Board conducted a nationwide search to fill the position. Joy skillfully exercised her talents and successfully shepherded AH through the search and transition to its new president and CEO, Eugene E. Jones, Jr. as we give Joy an ovation for a job well done, we welcome Gene ardently and look forward to continuing our mission under his experienced leadership.

Christopher Edwards, M.D., Chair

A Message from Atlanta Housing President and CEO

While Atlanta's housing developments continue to focus on luxury units and higher-income



clientele, thousands of low-income individuals and families cannot find a home that they can afford. Working families, seniors and our youth are among those struggling mightily and being left behind with inadequate opportunities and little hope. As president and CEO of Atlanta Housing and an industry veteran of nearly 35 years, I welcome the opportunity to improve AH's current strategic process and delivery of housing services for those in need, working independently and in collaboration with those who share our vision.

AH's FY 2021 MTW Plan includes the creation and preservation of affordable housing units through construction and subsidy assistance, increased voucher utilization, and a lower work/program requirement that better reflects current scheduling practices of today's employers and helps families stabilize. Being efficient, and increasing our productivity is key to the success of this Plan. I will continue to establish systems that are simple and competent, and to support my staff by providing them with the tools they need to succeed in their jobs. Resident satisfaction also is a chief concern, so I will build on AH successful programs and strengthen others that benefit and incentivize those that we serve.

The lack of affordable housing is a national crisis. There is no simple solution. But because we believe in the potential of people, we will continue our relentless efforts to provide quality, affordable housing for those in need while also putting our families on a pathway to economic independence, housing self-sufficiency, and, ultimately, homeownership.

Eugene E. Jones, Jr.

Executive Highlights

AH's Fiscal Year (FY) 2021 Plan continues to advance three core agency priorities: (1) increasing housing opportunities, (2) improving resident services and expanding economic opportunities, and (3) improving service delivery and making agency operations more efficient.

- **LIVE.** This component aligns with AH's agency goal to increase the availability of affordable housing by constructing new or rehabilitating existing units by modernizing or preserving units through investments, subsidy, or by optimizing voucher utilization.
- **WORK.** This component aligns with AH's agency goal to use housing as a platform to improve the quality of life beyond shelter and include economic, educational, and wellness opportunities into the solutions.
- **THRIVE.** This component aligns with AH's agency goal to act as good stewards of resources by maximizing operating efficiencies through collaboration and inclusion opportunities, leveraging resources, and simply operating at a leaner capacity.

Highlighted in this section are short-term goals and objectives for FY 2021. AH's short and long-term categorical definitions mirror HUD's operational definition, where short-term reflects goals and objectives that AH anticipates completing in 12 months or less. The long-term category captures goals and objectives that will take 13 to 60 months to complete.

Strategy 1: Real Estate

- Achieve and maintain a 98% occupancy rate or better at Property Manager-Developer (**PMDs**) sites through increased encouragement and monitoring of PMD sites.
- Acquire, dispose of, or demolish properties in accordance with the AH real estate development strategic plans.
- Advance predevelopment, financial closings, construction starts, and marketing and lease-up activities.
- Design and implement local, non-traditional activities to reduce subsidy reliance, support sustainability, and increase housing opportunities for low-income families.
- Increase affordable housing stock by creating units utilizing AH's tenant-based and project-based rental assistance programs and preserve affordable units through recapitalization or modernization programs.
- Administer AH's Over-Income Limit Policy for the Public Housing Program in accordance with HOTMA, Section 103 requirements as outlined in AH's Statement of Corporate Policies (**SCP**) and other guidance documents.

Strategy 2: Human Development Services

- Increase community outreach efforts within AH's service jurisdiction.
- Investigate the viability of expanding community outreach efforts beyond AH's service jurisdiction to provide services to reach target audiences.
- Achieve 80% compliance with AH's Work/Program Requirement for non-compliant households (work-able = individuals 18 to 61 years old and non-disabled).
- Review tenant-based vouchers (**TBVs**) designated for special purposes/programs to ensure maximum utilization. Consider amending commitment total(s) and reallocating under-utilized vouchers to other programs.
- Increase access to service providers and resources for all residents.

Strategy 3: Finances

- Continue to implement business solutions that permit AH to maximize effectiveness.
- Seek Gap Assistance Financing Fund (**GAFF**) or co-investment opportunities while improving the design of activity.
- Expand AH's role to empower low-income workers and small businesses.
- Introduce a Section 9 Annual Contributions Contract (**ACC**) Blended Subsidy Design to maximize the advantage of available AH MTW vouchers.
- Evaluate performance indicators and recommend improvements.
- Assess the viability and begin the approval process of changing AH's fiscal year from July 1 — June 30 to January 1 — December 31.

The following provides an overview of AH's enterprise-wide strategic business planning cycle that moves AH from strategic to tactical as each fiscal year progresses.



Graphic source: Office of Strategy, Policy, and Regulatory Affairs

SECTION I: OVERVIEW

A. Atlanta Housing

There are more than 3,800 Public Housing Agencies/Authorities (**PHAs**) nationwide, but AH proudly serves as one of 39 designated Moving-to-Work (**MTW**) PHAs. AH oversees rental assistance programs that provide more than 49,000 people with affordable housing solutions. As the largest PHA in the state of Georgia and one of the premier PHAs in the nation, AH manages rental assistance programs, where more than 95% of the participant families meet the definition of being extremely low-income (**ELI**) or very low-income (**VLI**). In FY 2019, AH served more than 24,500 households and on average, ELI and VLI families earned less than \$24,600 annually for a family of four.

Like many major metropolitan areas, the City of Atlanta has seen enormous economic and population growth over the past five years. As a result, rents in Atlanta continue to increase rapidly, leaving families, especially those meeting ELI and VLI definitions, priced out of the marketplace. Fortunately, AH's MTW flexibility allows it to design and test various approaches to combat some of these housing challenges within its service jurisdiction. Without its MTW designation, AH would not have been able to help nearly as many ELI and VLI families. Overall, AH's MTW designation **allows AH to focus on families and service delivery**.

The United States Congress created the MTW Demonstration Program, administered by the US Department of Housing and Urban Development (**HUD**), in 1996. AH received its MTW designation in 2001 and executed its MTW Agreement with HUD on September 23, 2003. The initial period was effective July 1, 2003 through June 30, 2010. AH and HUD have since negotiated and executed an Amended and Restated MTW Agreement, effective November 13, 2008, and further amended by that certain Second Amendment to the MTW Agreement, effective January 16, 2009, referred herein as the "MTW Agreement." The Second Amendment to the agreement (a) reinstates and expands AH's ability to invest MTW Funds in certain types of real estate transactions, and (b) reaffirms that AH's MTW Funds may be used for MTW-Eligible Activities (as defined in the Restated MTW Agreement), and for low-income housing purposes beyond the limitations of Section 8 and Section 9 of the US Housing Act of 1937.

In December 2015, Congress mandated the extension of the MTW Demonstration Program through June 30, 2028, under the same terms and conditions of AH's current agreement that HUD confirmed for this extension to AH in writing on April 14, 2016. All versions of the agreement require MTW PHAs to locally (1) achieve greater efficiency and effectiveness with federal dollars, (2) facilitate opportunities through incentives for family self-sufficiency, and (3) increase housing choices, collectively referred to as MTW Statutory Objectives.

AH must meet at least one of the three MTW Statutory Objectives identified earlier when designing or testing various MTW initiatives. Because of the ongoing renaissance of

Atlanta, **the primary challenge continues to be creating or preserving affordable housing** in a growing market as both the population and economy of the City continue to grow, an unintended consequence of progress is that it pushes Atlantans of lesser economic and educational means out of their communities.

The City of Atlanta 2016 Comprehensive Development Plan, updated in 2018, indirectly acknowledges that ELI and VLI families experience extreme competition for rental units with market rate renters. While the **city added more than 11,000 new housing units** to the market since 2010, **it lost 5,400 units priced under \$800 per month** during this same period. The nature of Atlanta's population growth is affecting the number and types of housing units constructed, as new real estate development focuses largely on luxury housing, and the widening income gap is exacerbating the challenge. This trend intensifies the competition for affordable living within the city. An added dynamic to the challenge is that **the rental-housing gap** for households earning less than \$30,000 annually **increases by 900 units each year** (or 9,000 units by 2030). It is therefore understandable why Atlanta has a shortage of property owners willing to accept rental assistance vouchers when there is a surplus of renters competing for units without administrative limitations.

AH embraces diversity and inclusion and recognizes that both are required ingredients to make equitable and great cities, as in the City of Atlanta's One ATL Housing Action Plan, which aligns all public agencies to accelerate affordable housing and equitable development. Therefore, **the strategy** to meet the challenge **continues to emphasize collaboration and community development alongside the creation of innovative live-work-thrive communities** that we achieve through a continued investment in transformative community strategies in AH development, self-sufficiency, and supportive services programming. These investments seek and maintain collaborative efforts with public and private partners, while continuing to streamline our service delivery approaches. Such streamlining efforts include updating financial strategies, policies and protocols, bringing more development activities in-house that uniquely address the affordable housing crisis in Atlanta, and collaborating with friends of the agency to combat displacement. Collaborative efforts allow both native Atlantans and newcomers to our city have an opportunity to live a quality life inside the city limits.

SECTION II: AGENCY PRIORITIES



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In FY 2021, AH will continue focusing on implementing and administering **program activities** designed to meet at least one of the three MTW Statutory Objectives listed below:

- **Statutory Objective 1:** Reduce costs and achieve greater cost effectiveness in federal expenditures.
- **Statutory Objective 2:** 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.
- **Statutory Objective 3:** Increase housing choices for low-income families.

In FY 2021 AH priority features AH activities that **benefit the people** internally and externally. These activities, to the greatest extent feasible, serve to benefit residents, the agency, and collaborators. The box below lists AH's rental/housing assistance programs.

AH Portfolio of Housing

AH-Owned Communities: 11 communities: 9 for elderly and disabled, and 2 family sites owned by AH.

Down-Payment Assistance: A forgivable subsidy loan to help eligible first-time homebuyers.

HAVEN: AH's supportive housing initiative that assists vulnerable populations.

HomeFlex: AH's MTW Project-Based Rental Assistance Program.

Housing Choice Vouchers: Tenant-based housing voucher assistance administered by AH.

Mixed Communities: Mixed-use, mixed-income developments that sit on AH-owned land or AH has an ownership interest, investment, or a subsidy assignment.

RAD PBV Communities: Former public housing units/sites, converted to project-based voucher (PBV) units/sites under HUD's Rental Assistance Demonstration (RAD) Program

A. Real Estate Overview

AH's real estate priorities for FY 2021 include building on the **Real Estate Development Model and Approach** from prior years' planning and due diligence, prioritizing properties for development, investment protocols, and financial feasibility for new construction and rehabilitation projects. FY 2020 priorities focused on accelerating predevelopment activities to spur housing production, and utilizing agency resources more efficiently. The FY 2021 Plan recommits AH resources to further its mission in the following ways:

- Accelerating and advancing affordable housing development in our pipeline.
- Aligning policies and procedures to support strong project controls and program compliance.
- Building agency capacity to develop, construct, own, and operate real estate assets.
- Diversifying development partnerships and investments, including commercial real estate development, and commercial business ventures.
- Establishing an organizational structure with supporting procedures and technology based on best real estate development practices.
- Identifying and building alternative sources of capital.
- Strategically reviewing potential acquisitions to ensure that the acquisition supports AH's strategic real estate development and revitalization plans.

AH has created a 10-year development plan designed to help meet the city's ever-growing need for affordable housing, and the agency's transition into self-development. The ten-year plan includes **building capacity** in all aspects of real estate, including planning, development, financing, investments, construction management, and asset management. Currently, AH augments this expertise with a bench of procured professional service firms that include brokers, planners, architects, engineers, construction managers, contractors, and developers.

Self-Development

In addition to continuing its public-private partnership development approach with developers, AH is increasing its capacity to be able to **self-develop its projects**. The ability to self-develop is consistent with MTW Statutory Objectives in that it is cost effective, can effectuate incentives for families with children, and increases housing choices for very low- and low-income families.

AH realizes that self-development puts AH on a natural progression to **creating a sustainable organization**. As a sustainable organization, AH envisions an ability to generate a return on investments (**ROI**) earned from self-development activities such as construction lending, ownership and management of real estate assets, and other relatable activities. AH would then apply those returns to activities that align with AH's mission such as increasing the affordable housing stock and improving the quality of life for families and communities in AH's service jurisdiction.

AHGreen

Other plans include exploring and implementing an **environmental sustainability initiative called “AHGreen”**. The plan would recognize that climate change disproportionately impact low-income families and may also contribute to Atlanta’s population growth as people across the southeastern United States are displaced by rising seas and inhospitable weather.

During FY 2021, AH will continue to embark upon planning a comprehensive environmental sustainability initiative to codify existing practices and new efforts and leverage local partnerships and funding to reduce resident utility burdens, reduce the agency’s carbon footprint, engage in green job training, and assume the lead on green best practices. We believe that there are **five key areas for implementation**:

- Facility and Organization Operations: program planning, procurement, recycling, and fleet management;
- Resident Services, including workforce training and energy awareness;
- Planning and Development, including planning, environmental management, and sustainability, acquisition, and real estate development;
- Construction and Property Management; and
- Landlord Services, from small landlords to resident communities.

AH has spent the past few months interviewing and researching best practices and does not anticipate exercising any MTW waivers in FY 2021, but may request waivers in future MTW Plans that align with strategic planning direction as AHGreen progresses.

Community Development

Agency priorities also include **community development**. AH’s most visible asset in its real estate development model is its real estate! AH owns more than 400 acres in the city of Atlanta, primarily vacant former public housing sites. The remaining parcels acquired by AH came through purchases, land swaps, and in some cases donations and are located adjacent to AH redevelopments and throughout the city. Approximately forty percent of AH’s total acreage is obligated to specific developers who have the right to develop the parcels for a specific time. AH has the opportunity to develop those sites to support neighborhood revitalization and stabilization.

AH can build capacity in all dimensions of real estate development, while also continuing to pursue financially feasible, healthy mixed-use, mixed-income communities in amenity-rich neighborhoods. The following characteristics are commonly associated with an amenity-rich neighborhood:

- Possesses an environmental sustainability nature
- Includes grocery stores, produce markets, and similar merchants in close proximity
- Near healthcare facilities, pharmacies, banks, and similar service-oriented businesses
- Close to commercial centers and jobs or regular public transportation
- Access to quality schools and educational institutions

- Reasonable public safety
- Nearby parks, recreational centers, and greenspaces
- Solid or stable public infrastructure, such as sidewalks, water and sewer lines, etc.

Residential development may include amenities in areas of opportunity, in areas with limited amenities in the neighborhood, which is why AH continues to support development in all communities.

Partnerships

Further agency priorities include identifying, strengthening, and seeking **partnerships**, as AH acknowledges the importance of collaboration and embraces the motto: “Teamwork makes the Dream work”. Therefore, AH understands that it will continue to work closely with the City of Atlanta, Invest Atlanta, Atlanta Beltline, Inc., Fulton County, and philanthropic, private, and public agencies and organizations to continue in developing sound approaches and strategies needed to construct, preserve, and operate affordable housing units and to stabilize and revitalize neighborhoods.

In addition, AH continues to seek partners across industries to attract support and resources. Such partnerships begin with **philanthropic, private, and public organizations that call Atlanta home** or maintains a regular presence in Atlanta. These include, but are not limited to, Westside Future Fund, Atlanta Public Schools, MARTA, Georgia Department of Community Affairs, Southern Company, Home Depot, Georgia Pacific, Delta Airlines, and others.

Preliminary examples of support and resources include offering opportunities for economic independence and housing self-sufficiency for low-income families through neighborhood revitalization efforts, including construction and preservation of affordable housing units and place-based supportive strategies that create sustainable quality living environments.

Long-term priorities include **identification and development of financial vehicles** to leverage resources by generating or increasing sources of capital. Initial financial vehicles may include bond issuances, loans, grants, development fees, management fees, origination fees, and preferred capital funds that will heavily support the construction of new units, creation of affordable units, and preservation of existing units that are mutually beneficial to low-income families, AH partners, or AH. AH will actively seek funding awards from foundations, HUD, and other federal, state, or local agencies that support its initiatives.

In April 2019, AH agreed to collaborate with Invest Atlanta to **create an investment vehicle** by which AH and Invest Atlanta collectively provide gap financing for the development of affordable, mixed-use, mixed-income residential communities in the city of Atlanta. AH expects the co-investment generate a minimum of \$60 million in combined investments. AH may participate in these projects by co-developing or acquiring properties and providing financing or subsidy in accordance with its Statement of Corporate Policies. AH financing includes long-term loan products where AH is either the landowner or a partner in a general partnership or short-term construction loan product, where AH is merely providing construction financing and subsidy.

AH and Invest Atlanta will vet potential projects via a dual application and review process for individual approval by AH's Board of Commissioners, Invest Atlanta, and ultimately the HUD Field Office and HUD-HQ via mixed-finance financial closings, acquisitions or dispositions. Future projects will meet the following criteria:

- Located in areas where census tracts area median income exceed 100% AMI, where poverty level are <20%, and or minority levels <20%.
- Located within the Atlanta Beltline Tax Allocation District (**TAD**) or Overlay District.
- Located in areas at-risk of displacement.
- Opportunity to preserve naturally occurring affordable housing
- Located within 1 mile to medical, public transportation, education, and employment hubs.
- Transit-Oriented Development as defined by the Georgia Department of Community Affairs (**DCA**) Annual Qualified Allocation Plan (**QAP**).
- Located within 3 miles of an AH vacant former public housing site.

Other Real Estate Activities

Other activities that AH may engage in during FY 2021 to maximize the number of new affordable units for low-income families within its service jurisdiction could include the following opportunities as they arise and require AH's action:

- Collaborative work to implement and potentially administer real estate activities under an aligned co-investment framework that supports low-income families and is mutually beneficial to Atlanta Housing. Such work may include the co-investment program, previously described, and other public partnerships.
- Development of Workforce Housing is an undertaking that seeks funding and partnerships to support housing opportunities for those families with household incomes ranging from 80% to 120% of the Area Median Income (**AMI**).

- Efforts to openly and vigorously support community retention and stabilization, where potential solutions may include the following:
 - Allowing for site-based waiting lists for each phase of a development.
 - Including an eligibility preference to mitigate displacement, and gentrification.
 - Eligible residents displaced because of demolition activities
 - Eligible residents relocated because of community redevelopment
 - Revising or making an exception to existing site and vicinity standards on a case-by-case basis, where AH standards are more restrictive.
 - Submitting regulatory MTW waiver requests to offer the least restrictive regulatory requirements allowable under AH's MTW Authorizations.
 - Supporting significant community redevelopment initiatives, potentially involving philanthropic, private, or non-profit organizations, including accepting the transfer of property(s) from local government agencies, pursuant to intergovernmental agreements, to facilitate efforts to rehabilitate and restore blighted and crime-infested neighborhoods. AH has updated its occupancy and preference policies in preparation to participate in this community stabilization effort once the parties finalize parameters and update party roles.
 - Working collaboratively with educational, healthcare, and workforce partners and stakeholders to implement place-based strategies that create and support opportunities for self-sufficiency.
- Issuance of Requests for Interests, Qualifications, or Proposals (RFI/RFQ/RFPs) for real estate development, financial and construction services, and pre-qualified development partners for development activities on AH-owned properties. AH intends to issue a procurement for a pre-qualified bench of developers to accelerate development of its portfolio. AH will maintain the option, outside of the solicitation process, to self-develop properties.
- Land swaps or dispositions of land that are not suitable for residential development, AH may designate the proceeds (or a portion thereof) for the benefit of low-income families; e.g., resident scholarship program, down payment assistance, supportive services, development or preservation of affordable units, and similar activities/programs.
- Land transactions that advance development, promote neighborhood stabilization and revitalization of AH-owned land, prevent displacement or gentrification, or simply support affordable housing development in amenity-rich areas of opportunity. Transactions may include acquisitions, demolitions, dispositions, land swaps, financial investment strategies, and similar activities.
- Utilization of alternative funding options: e.g., Choice Neighborhoods Planning and Implementation Grant(s) (**CNPG**, **CNIG**), local funds, MTW funds, Replacement Housing Factor (**RHF**) funds, short- and long-term investments to generate additional development and public infrastructure funds, private or public equity funds, and other sources, for ongoing and future revitalization activities.

B. Projects and Plans

AH provides affordable housing opportunities through a diversified portfolio approach and **since 1995**, it has collaborated with private development partners to create quality mixed-use, mixed-income communities on AH-owned land. This business model has **created more than 4,000 affordable housing units** and has had an economic impact that exceeds \$2 billion. AH's Mixed-Communities are amenity-rich, and some of them offer access to high-performing schools, public transportation, employment centers, banking, shopping, healthcare, and more. The following bullets define mixed communities for portfolio management purposes:

- **AH-Owned Communities:** 100 percent affordable for low-income families; 9 designated for elderly/disabled residents and 2 multifamily sites. Various private Property Management Development (**PMD**) partners manage all 11 sites. These properties will convert Section 9 subsidy assistance under the Rental Assistance Demonstration (**RAD**) Program over the next few years. This conversion action ensures that properties will remain affordable for low-income families and allows recapitalization to ensure that we can complete major improvements.
- **Existing Mixed Communities:** Multi-phased developments constructed on AH-owned former public housing sites as a public-private partnership with developers who own and operate the building while AH maintains control of the land. Completed before 2010, these projects were generally part of a large-scale multi-phased redevelopment plan. These projects are also undergoing a subsidy conversion or a recapitalization through the RAD Program.
- **New Mixed Communities:** In its ten-year real estate strategy, AH plans to leverage its land and capital to attract new investments, and to plan, develop, preserve, and expand housing opportunities to operate modern, distinctive, quality communities. AH will continue to pursue new mixed-use, mixed-income developments on AH-owned land utilizing private sector development partners or an AH affiliate to continue to invest in and revitalize those sites as mixed-communities consistent with its comprehensive redevelopment plans.

For clarification, AH defines mixed communities as their mixed-income, or mixed-use mixed-income developments either on AH-owned land, where an ownership interest in the general partnership lies with AH, or AH provides construction financing and subsidy. In addition, a complete listing of properties owned by AH is available by request. Later in this document, we will discuss projects that AH anticipates advancing or completing during FY 2021.

AH continues to pursue a development model dependent on the unique requirements of each site, the site's development program, and available funding. **AH, may utilize a traditional model of private-public development partnership, may co-develop properties, or develop under a self-development model.** In some instances, AH will serve as the master developer for planning and predevelopment activities, feasibility assessments and design concept, land due diligence, environmental management and sustainability, public infrastructure development, entitlement approval, and other master-planning activities.

Short-term Goals and Objectives

Over the next 12 months, AH plans to advance elements of the various community redevelopment and other revitalization plans, which may include acquisitions of vacant land and existing assets, land swaps, site demolition/disposition, and similar activities citywide that support affordable housing development and preservation and promote neighborhood stabilization and alignment of AH's community development goals. Land transactions may also include concerted efforts to acquire developed or vacant land in amenity-rich areas of opportunity that advance and promote development of integrated mixed-use, mixed-income communities, revitalize AH-owned land, preserve naturally occurring affordable housing, and prevent displacement or gentrification of current low-income residents. These plans are subject to market demand, financial feasibility, available funding, and market conditions described later on in this document.

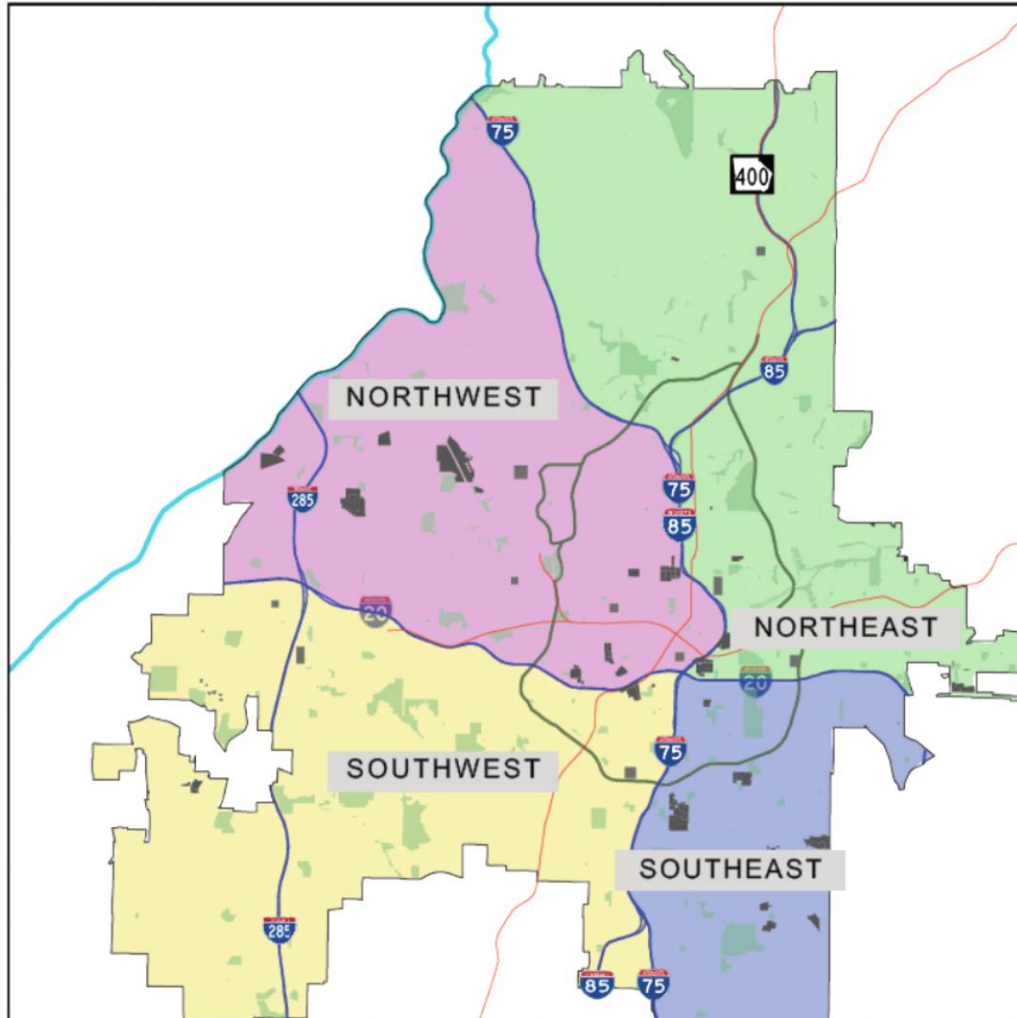
AH will continue to apply, as applicable, our HUD-approved **Development Process Protocols** in accordance with our HUD-approved MTW Agreement to create and preserve affordable housing units during FY 2021 and beyond. An abbreviated overview of AH's MTW protocol activities include designating **Belinda Bly, Public Housing Revitalization Specialist, to serve as AH's point of contact (POC)**, effective August 2019. As POC, Ms. Bly is authorized to approve directly, AH's acquisition of sites and closing on mixed-finance transactions without further HUD approval. AH acknowledges and understands that periodically, HUD may request additional information that AH will provide for informational purposes only and not for approval.

Activities for development projects may include the following activities during FY 2021:

- Predevelopment: market analysis, financial feasibility, site analysis, and due diligence.
- Site acquisition and disposition.
- Master planning.
- Zoning and entitlement.
- Environmental testing, remediation if required, and monitoring.
- Public improvements: infrastructure, easements, and dispositions of rights-of-way.
- Site preparation.
- Architectural design.
- Financing and investments – where infrastructure, site construction, mixed-finance closing, or other phased development occurs, financing may include submission of a four-percent or nine-percent Low-Income Housing Tax Credit (**LIHTC**) application, tax-exempt bonds, use of other private and public funding source, as well as an AH investment in predevelopment, construction, permanent financing, or down payment assistance.
- Approval from the AH Board of Commissioners, HUD Local Field Office (**LFO**) or Headquarters (**HQ**), and others, as necessary.
- Community and stakeholder engagement and participation, including former residents of demolished public housing properties.

The execution of the activities listed above are contingent upon approvals, available funds, and market conditions. The following pages reflect some of the in-progress projects, by quadrant, which AH plans to advance/accomplish during FY 2021.

AH includes a map to illustrate the quadrants of the city.



The development projects below are not all-inclusive, but reflect in-progress projects that AH anticipates **advancing or completing** during FY 2021.

Northeast: Auburn Pointe, Capitol Gateway, Civic Center, North Avenue/U-Rescue, Madison Reynoldstown

Northwest: Bankhead Courts, Bowen Homes, CollegeTown at West End, Heritage Village at West Lake, Herndon Square, Hollowell Corridor, Johnson Road, Magnolia Perimeter Scattered Sites, Palmer House, Scholars Landing, Villas of Hope, West Highlands

Southeast: Chosewood Park, Englewood, Thomasville, Villages at Carver

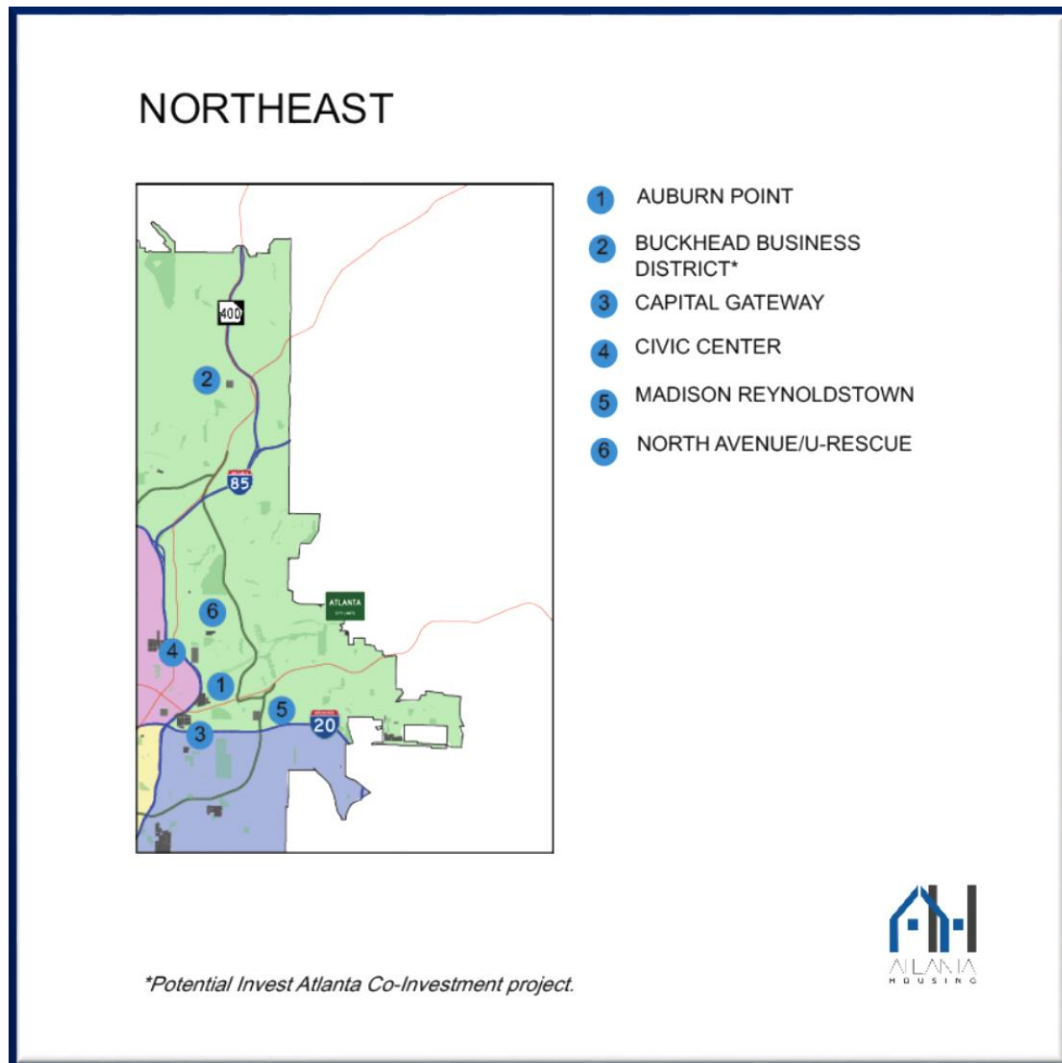
Southwest: Capitol View Apartments, London Townhomes, Mechanicsville

Other areas of focus include the Buckhead Business District and Downtown Business District. The following pages highlight AH's current and future projects mapped by quadrant. All quadrants may include potential co-investment projects with Invest Atlanta.

Northeast Sector

This sector includes the areas east of Georgia Highway 400 and Interstate 75, and north of Interstate 20. The majority of the neighborhoods in this market sector are located in areas of opportunity, as most have undergone revitalization and gentrification, or their current residents are currently in danger of displacement because of appreciating real estate values, increasing rents, and a limited supply of affordable housing.

The map below is a snapshot of anticipated development activities at key sites during FY 2021.



Short-Term Goals and Objectives FY 2021 (June 30, 2021)																
AH Projects (A - Z)	Acquisition	Disposition	Ground Lease	Demolition	Remediation	Planning & Due Diligence	Public Infrastructure	Financial Closing	Vertical Construction	Renovations	Lease-up/Sales	Stabilized/Operational	RAD	HomeFlex	Choice Planning Grant	Description
Auburn Pointe		X				X		X								Final phases of Hope VI revitalization of PH site. AH and Developer will begin predevelopment and development in FY 2021 with potential financial closing.
Capital Gateway		X				X		X								Final phases of Hope VI revitalization of PH site. AH and Developer will begin predevelopment and development in FY 2021 with potential financial closing.
Civic Center		X	X		X	X	X		X							Environmental remediation, public infrastructure, and disposition and/or ground lease submission for phased-redevelopment
MadisonReynoldstown	X	X	X					X	X							4% or 9% LIHTC award, acquisition and immediate ground lease to JV entity for new construction of 101 units on Atlanta Beltline
North Avenue/U Rescue		X	X			X	X	X								Anticipated Developer selection, commencement of public infrastrucutre construction. Financial closing and long-term ground lease for Phase I in FY 2021

Madison Reynoldstown

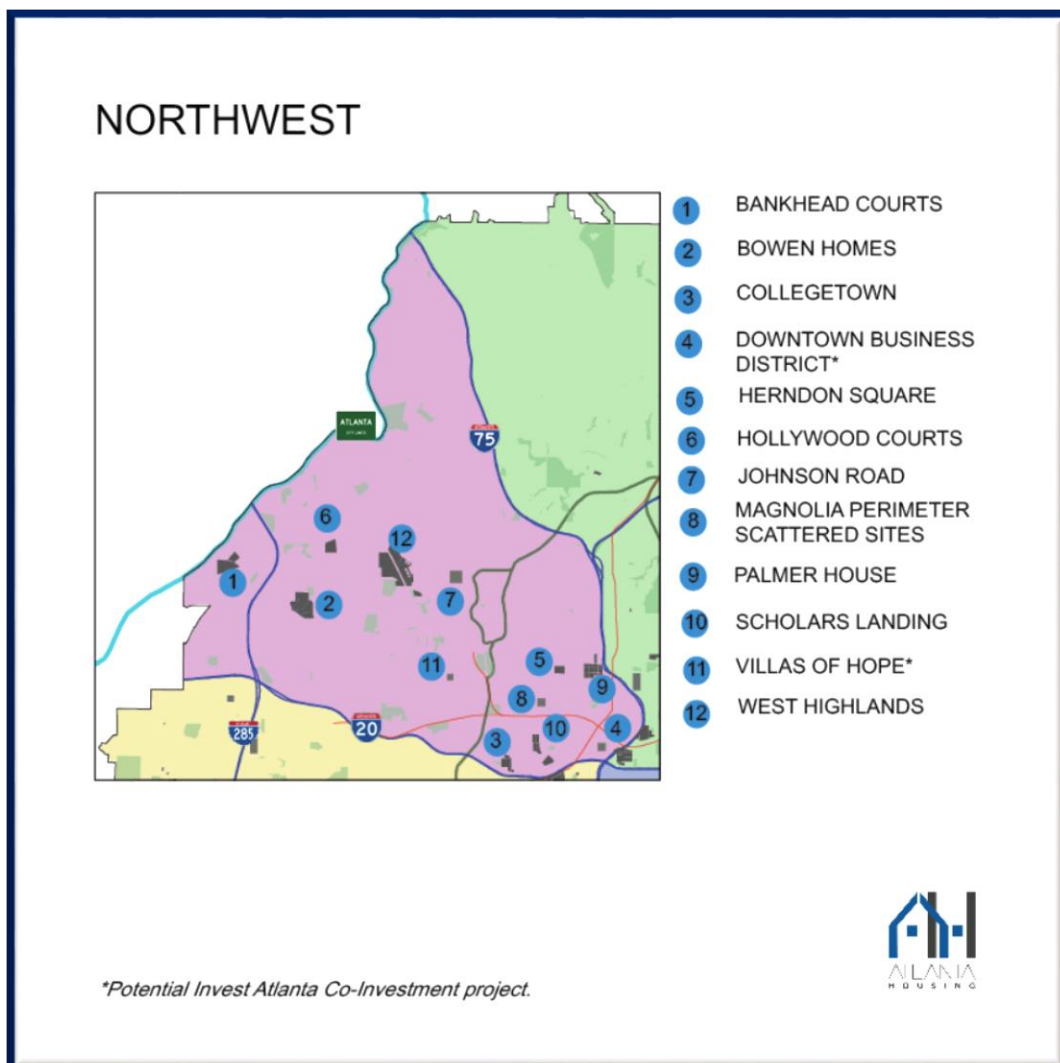


Development Partner	Rea Ventures Group and collaborative partnership with the Atlanta Beltline
Address	890 Memorial Drive, Atlanta, GA 30316
Acreage	~1.25
Quadrant for Development	Northeast
Existing Amenity	Immediate access to the Atlanta BeltLine Eastside Trail, grocery, pharmacy, MARTA, restaurants and retail within a ¼ mile
Phasing/Unit Production	Mixed-use, mixed-income multifamily development: 101 total units 86 affordable units (85%) 40%, 60%, and 80% AMI Retail: ±2,700 sq. ft.
Development Schedule	Financial Closing: December 2020 Construction Period: January 2021 – June 2022
AH Acquisition Cost	\$1,000,000
Estimated Total Development Cost	\$29,934,609
AH Capital Investment	\$6,680,000
LIHTC Equity	\$15,798,420
Atlanta Beltline Grant	\$2,000,000
Deferred Developer Fee	\$556,189
AH Subsidy	35 HomeFlex Vouchers

Northwest Sector

The Northwest sector includes neighborhoods within the boundaries created by Georgia Highway 400 and Interstate 85, north of Interstate 20. The area located within 3 miles of the city's core is an amenity-rich area of opportunity. It holds the prospect to preserve organically occurring affordable housing, prevent gentrification, and add new affordable housing opportunities for low-income families. The area includes the downtown business center, municipal, state, and federal government centers, arts and entertainment venues, institutions of higher learning, including the Atlanta University Center (**AUC**), which is the largest collective of Historically Black Colleges and Universities (**HBCUs**) in the country. The AUC is also the recipient of a HUD Choice Neighborhoods Implementation Grant (**CNIG**).

The map below is a snapshot of anticipated development activities at key sites during FY 2021.



Short-Term Goals and Objectives FY 2021 (June 30, 2021)																
AH Projects (A - Z)	Acquisition	Disposition	Ground Lease	Demolition	Remediation	Planning & Due Diligence	Public Infrastructure	Financial Closing	Vertical Construction	Renovations	Lease-up/Sales	Stabilized/Operational	RAD	HomeFlex	Choice Planning Grant	Description
Bankhead Courts						X									X	AH intends to begin redevelopment planning for this site and may seek a Choice Neighborhoods Planning Grant or other assistance to advance the plan
Bowen Homes	X				X	X	X								X	Environmental remediation will commence FY 2021. AH may seek a Choice Neighborhoods Planning Grant, or may proceed with procurement of development partner, masterplanning, and public infrastructure
CollegeTown		X				X		X								Final phases of Hope VI revitalization of PH site. AH and Developer will advance predevelopment/development in FY 2021 with potential for financial closing
Heritage Village at West Lake*	X	X	X						X							Acquisition and conversion of mixed-use vacant building into mixed-use supportive housing
Herndon Square I								X								Vertical Construction through FY2022
Herndon Square II		X	X			X		X	X							Financial closing by 12/2020, vertical construction commencement
Herndon Square III-V						X	X									Public Infrastructure completion by 12/2020
Hollowell Brookview Heights*	X	X	X			X	X									Immediate ground lease to JV entity for new construction rental and for-sale units

Short-Term Goals and Objectives FY 2021 (June 30, 2021)																
AH Projects (A - Z)	Acquisition	Disposition	Ground Lease	Demolition	Remediation	Planning & Due Diligence	Public Infrastructure	Financial Closing	Vertical Construction	Renovations	Lease-up/Sales	Stabilized/Operational	RAD	HomeFlex	Choice Planning Grant	Description
Hollywood Courts				X	X											Environmental remediation in FY 2021, with masterplanning and construction through 2028
Johnson Road / Quarry Park		X		X	X											Demolition of vacant structures to prepare site for development, and procurement of development partner
Magnolia Perimeter Scattered Sites		X		X				X		X						Construction of three sets of scattered sites by development partners procured in FY 2020
Palmer House		X	X		X	X	X	X								Procurement of development partner, planning and design, and construction to commence in FY 2021
Roosevelt Hall									X		X					University Choice Neighborhoods commercial development. Renovations complete in FY 2021
Verben Gardens*	X	X	X	X	X			X	X							Acquisition and immediate ground lease back to JV entity, either renovation of existing vacant units, or demolition and new construction
Villas of Hope*	X								X	X						Acquisition and preservation of exisiting supportive housing units on Atlanta Beltline
West Highlands Homeownership		X						X		X						Final phases of Hope VI revitalization of PH on-site and off-site land
*Potential Invest Atlanta Co-Investment Project																

Herndon Square Senior



Former Public Housing Site	Herndon Homes
Development Partner	Hunt Development Group and Oakwood Development
Address	500 Northside Drive, NW, Atlanta, GA 30318
Acreage	±1.62 acres
Quadrant for Development	Northwest
Existing Amenity	The Technology Enterprise Park (TEP), Georgia Institute of Technology, Georgia World Congress Center, Mercedes Benz Stadium, Atlanta Beltline Trail, and Northyards are all within a ½ mile
Phasing/Unit Production	Phase I of IV: 97 units - 100% Affordable for ages 62 and older
Development Schedule	Financial Closing: December 2019 Construction Period: 16 months
Estimated Total Development Cost	\$25,482,900
AH Capital Investment	\$12,821,110
LIHTC Equity	\$12,661,110
Other Funds	\$0
Deferred Developer Fee	\$0

Herndon Square Phase II



Former Public Housing Site	Herndon Homes
Development Partner	Hunt Development Group and Oakwood Development
Address	500 Northside Drive, NW, Atlanta, GA 30318
Acreage	±3 acres
Quadrant for Development	Northwest
Existing Amenity	The Technology Enterprise Park (TEP), Georgia Institute of Technology, Georgia World Congress Center, Mercedes Benz Stadium, Atlanta Beltline Trail, and Northyards are all within a ½ mile
Phasing/Unit Production	Phase II of IV: 200 multifamily units - 40% Affordable (Target) Retail: ±24,000 sq. ft.
Development Schedule	Financial Closing: December 2020 Construction Period: 18 – 24 months
Estimated Total Development Cost	Residential: \$53,000,000 Commercial: \$7,700,000 Total Cost: \$60.7 million
AH Capital Investment	\$7,900,000
LIHTC Equity	\$11,960,076
Other Funds	\$40,800,000
Deferred Developer Fee	\$1,700,000

Magnolia Perimeter Scattered Sites



Former Public Housing Site	N/A
Development Partner	Atlanta Neighborhood Development Partnership; CityPlace; Quest Communities Development Organization, Inc.; and Westside Future Fund
Address	Vine City/University Choice Neighborhoods
Acreage	±4.4 acres
Quadrant for Development	Northwest
Existing Amenity	AUC, grocery store, restaurants, Georgia World Congress Center, Mercedes-Benz Stadium, easy access to MARTA
Phasing/Unit Production	3 sets of properties: 16 multifamily 4 single-family rental units 17 single-family/townhome for-sale units 37 units - 100% Affordable
Development Schedule	Financial Closing: Summer 2020 Construction Period: Summer 2020 – July 2021
Estimated Total Development Cost	\$6,500,000
AH Capital Investment	\$3,000,000 (estimated)
LIHTC Equity	\$0
Other Funds	3,500,000 (estimated)
Deferred Developer Fee	\$0

Scholars Landing



Former Public Housing Site	University Homes in Choice Neighborhood
Development Partner	Integral Development Group, LLC
Address	Atlanta Student Movement Blvd, SW, Atlanta, GA 30310
Acreage	20.9 acres
Quadrant for Development	Northwest
Existing Amenity	AUC, easy access to MARTA, close to downtown business district, healthcare, restaurants, retail shops, grocery stores, and more
Phasing/Unit Production	Development into a mixed-use, mixed-income community 235 multifamily 160 senior units 33 for-sale townhomes 588 total units – Approx. 50% affordable
Development Schedule	Financial Closing: May 2020 (SL IC) December 2020 (SL II) Construction Period: Through end of 2022 3 Remaining phases: 2 MF; 1 homeownership
Estimated Total Development Cost	\$75,000,000
AH Capital Investment	\$49,958,897
LIHTC Equity	\$12,900,000
Other Funds	\$12,388,691
Deferred Developer Fee	\$0

West Highlands

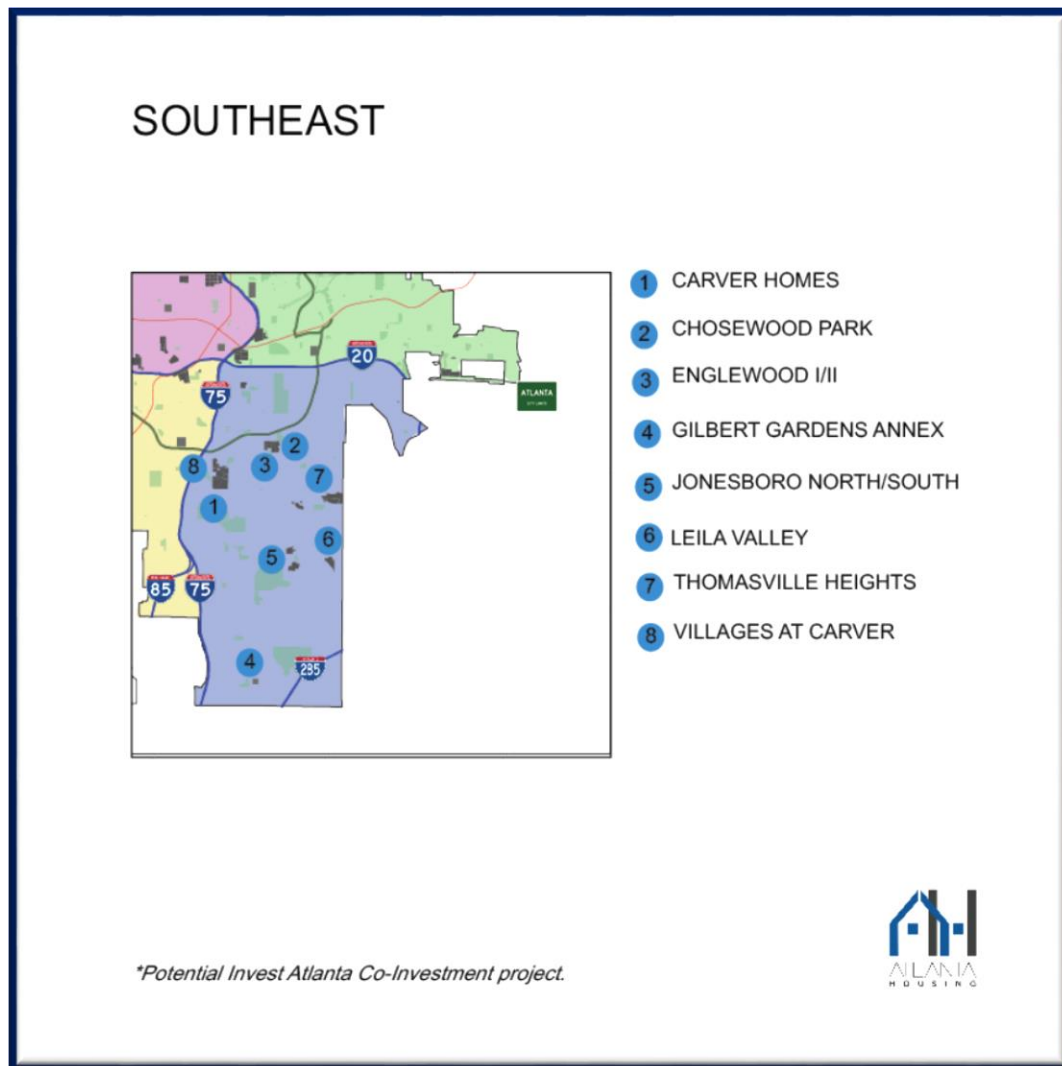


Former Public Housing Site	Perry Homes
Development Partner	Perry Redevelopment, LLC
Address	Perry Boulevard, NW, Atlanta, GA
Acreage	±200 acres
Quadrant for Development	Northwest
Existing Amenity	Proctor Creek Trail, connectivity to Atlanta Beltline Trail, playground, park systems, ponds, easy access to future Westside Park at Bellwood Quarry
Phasing/Unit Production	5 Phase mixed-use, mixed-income revitalization of AH-owned/acquired and developer-owned parcels ±700 rental units 786 for-sale single-family and townhome units. Approx. 30% affordable Revitalization began 1998
Development Schedule	Ongoing disposition of remaining homeownership phases during FY 2021. Construction management for repairs of common areas and public infrastructure in preparation for dedication to CoA. Construction Period: Through 2024
AH Capital Investment	\$12,242,400 for repairs to common areas, amenities, and public infrastructure
Other Funds	\$0
Deferred Developer Fee	\$0

Southeast Sector

The Southeast quadrant includes neighborhoods south of Interstate 20 and east of Interstate 75. The most northern portion of this sector includes the Atlanta Beltline and proximity to the growing Memorial Drive corridor, as well as expected private redevelopment in the Chosewood Park area. This area is part of the stable Grant Park and Ormewood Park neighborhoods, which have already undergone revitalization. This sector does not have a strong commercial base; therefore, AH is working with its development partners and stakeholders to ensure future real estate projects deliver true mixed-use developments with amenity-rich commercial retail opportunities for neighborhood residents.

The map below is a snapshot of anticipated development activities at key sites during FY 2021.



Short-Term Goals and Objectives FY 2021 (June 30, 2021)																
AH Projects (A - Z)	Acquisition	Disposition	Ground Lease	Demolition	Remediation	Planning & Due Diligence	Public Infrastructure	Financial Closing	Vertical Construction	Renovations	Lease-up/Sales	Stabilized/Operational	RAD	HomeFlex	Choice Planning Grant	Description
Carver Homes		X						X								Final phases of Hope VI revitalization of PH site. AH and Developer will advance predevelopment / development in FY 2021 with potential for financial closing
Chosewood Park I	X	X	X													Ground lease with City of Atlanta through 2023
Chosewood Park II	X	X	X													Complete conveyance of 2nd half of land swap transaction with the City of Atlanta, with immediate ground lease back to city through 2023
Englewood		X	X				X	X	X							Public Infrastructure, financial closing, and ground lease to JV entity for Phase 1 of multi-phase mixed-use mixed-income revitalization plan
Gilbert Gardens Annex		X														Disposition due to proximity to Airport
Jonesboro South		X														2nd transaction of Chosewood land swap/fee simple conveyance with the City of Atlanta
Thomasville Heights	X					X									X	AH intends to begin redevelopment planning for this site and may seek a Choice Neighborhoods Planning Grant or other assistance to advance the plan
Veranda @ Carver												X				
*Potential Invest Atlanta Co-Investment Project																

Englewood

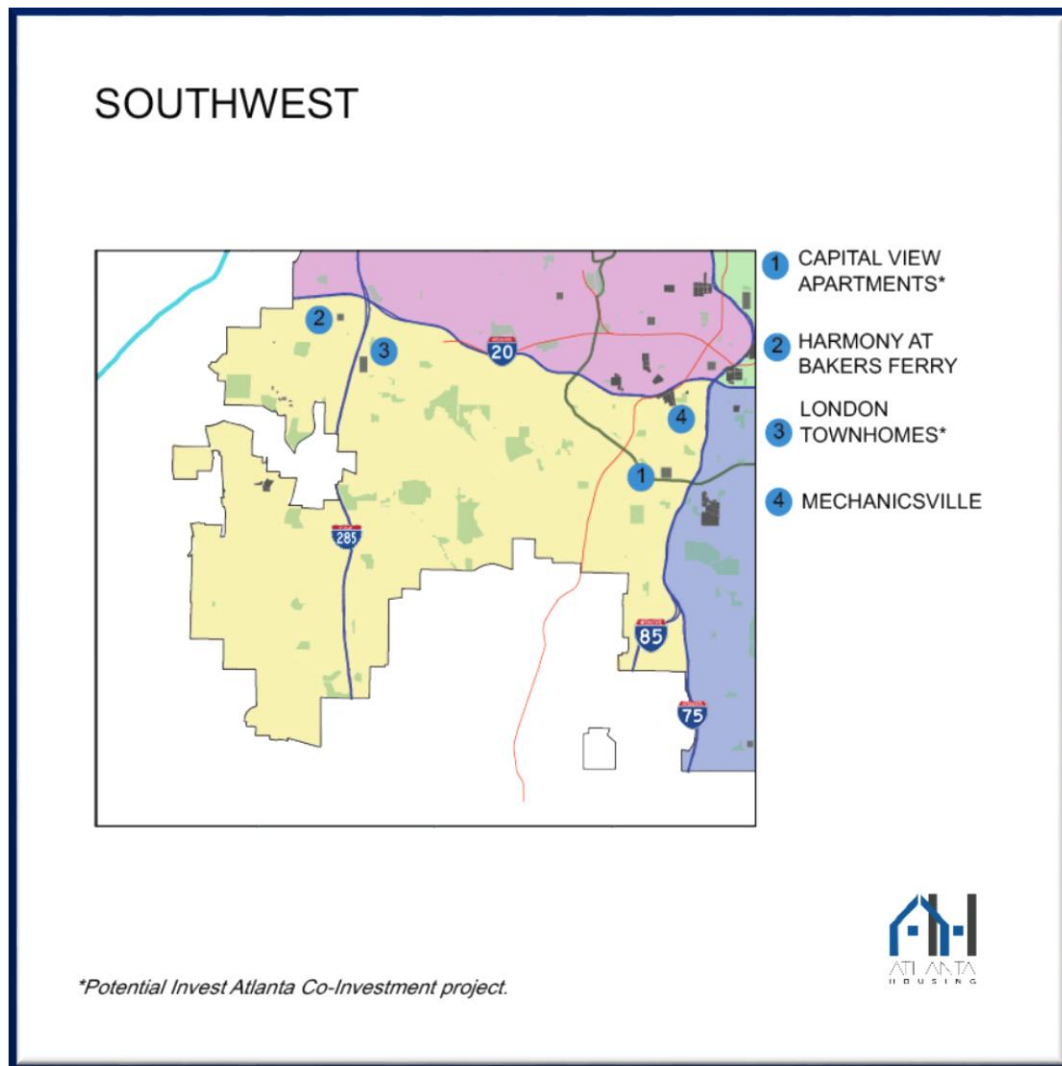


Former Public Housing Site	Englewood Manor
Development Partner	The Benoit Group and The Michaels Group
Address	0 Englewood Avenue SE, Atlanta, GA 30315
Acreage	±30.3 acres
Quadrant	Southeast
Existing Amenity	Located < ½ mile from the future Atlanta Beltline southeast trail and transit station. Immediately adjacent to Chosewood Park and Boulevard Crossing Park
Phasing/Unit Production	Mixed-use, mixed-income multifamily and senior rental and homeownership units. ≥850 residential units 30% Affordable (Target) Retail: ±50,000 sq. ft.
Development Schedule	Public Infrastructure: FY 2021 Construction Period: Multiple phases, FY 2021 – FY 2029
Estimated Total Development Cost	\$40,000,000 public infrastructure \$290,000,000 vertical construction
AH Subsidy	\$0

Southwest Sector

Located south of Interstate 20 and west of Interstate 75, neighborhoods located in this area are slowly seeing revitalization. A majority of this market sector is also located in proximity to Atlanta's Hartsfield-Jackson International Airport. However, as land values have skyrocketed amid continued citywide development pressures, the real estate market will start to expand farther southwest. With the completion of Tyler Perry Studios in 2019, redevelopment moving forward at Fort McPherson and the revitalization of numerous blighted areas around the Beltline, these real estate market trends will present opportunities to preserve and revive high-quality affordable housing communities in the Southwest sector.

The map below is a snapshot of anticipated development activities at key sites during FY 2021.



Short-Term Goals and Objectives FY 2021 (June 30, 2021)																
AH Projects (A - Z)	Acquisition	Disposition	Ground Lease	Demolition	Remediation	Planning & Due Diligence	Public Infrastructure	Financial Closing	Vertical Construction	Renovations	Lease-up/Sales	Stabilized/Operational	RAD	HomeFlex	Choice Planning Grant	Description
Capitol View Apartments*										X	X	X				Preservation of historic multifamily community on the Atlanta Beltline
Harmony at Bakers Ferry*	X	X	X						X		X					Immediate ground lease to JV entity for new construction of 114 senior units 52+
London Townhomes*										X	X					Preservation of naturally occurring affordable units. Townhome cooperative community conversion to 200-unit multifamily community
Mechanicsville Homeownership		X							X		X					Final phases of Hope VI revitalization of PH sites AH and developer will advance predevelopment / development of site in FY2021
																*Potential Invest Atlanta Co-Investment Project

Capitol View Apartments



Former Public Housing Site	Capitol Homes
Development Partner	Columbia Residential
Address	1191 Metropolitan Parkway Atlanta, GA 30311
Acreage	±6.9 acres
Quadrant for Development	Southwest
Existing Amenity	On the Atlanta Beltline Westside Trail with immediate access to public transportation, close to Interstates 75 and 85, downtown business district, and registered on the National Historic Registry
Phasing/Unit Production	Preservation of naturally occurring affordable housing 120 multifamily units 24 units are supportive housing units 100% Affordable
Development Schedule	Financial Closing: 13-month phased renovation schedule Construction Period: Complete by February 2021
Estimated Total Development Cost	\$26,361,019
AH Capital Investment	\$0
LIHTC Equity	\$17,748,866
Other Funds	\$ 7,522,000
Deferred Developer Fee	\$ 1,090,153
AH Subsidy	24 HAVEN Vouchers 40 HomeFlex Vouchers <30% to 60% AMI

London Townhomes



Former Public Housing Site	N/A
Development Partner	The Benoit Group
Address	308 Scott Street, SW, Atlanta, GA 30311
Acreage	±17.5 acres
Quadrant for Development	Southwest
Existing Amenity	Clubhouse
Phasing/Unit Production	Conversion of existing townhome cooperative community to affordable housing units 200 residential units 90% Affordable
Development Schedule	Financial Closing: 16-month substantial rehabilitation and preservation Construction Period: March 2020 – July 2021
Estimated Total Development Cost	\$38,750,310
AH Capital Investment	\$1,094,065 (construction) \$6,370,301 (bridge loan)
LIHTC Equity	\$18,416,160
Other Funds	\$18,890,081
Deferred Developer Fee	\$350,004
AH Subsidy	150 HomeFlex Vouchers <60% AMI @ 60% rents

Acquisition, Demolition, and Disposition

AH makes a concerted effort to increase affordable housing opportunities in amenity-rich areas, areas of opportunity, and to preserve existing and organically occurring affordable housing by acquiring developed and undeveloped land, developed non-residential properties, and existing residential properties within its service jurisdiction, in addition to catalyzing development and investments in underserved areas with new housing and amenities. During FY 2021, as available, AH may engage in the following acquisition actions:

Anticipated End of FY 2021 Project Status (June 30, 2021)		
Sector	AH Projects (A - Z)	Description
ALL	Areas of Opportunity	Close proximity to jobs, retail, healthcare, transportation, and education; Neighborhoods in danger of displacement/gentrification; Areas with high rents/property values/AMI, and limited affordable housing (ie Buckhead, Midtown, and Downtown Business district, Westside Park at Bellwood Quarry, Donald Lee Hollowell Corridor)
ALL	Preservation Opportunities	Preservation of existing affordable units (i.e. at the end of LIHTC period), or naturally occurring affordable units
ALL	Revitalization Opportunities	Properties adjacent to, or in neighborhoods surrounding, AH-owned land and vacant former PH sites undergoing revitalization ; Vacant and/or blighted properties in revitalization areas (ie Westside Park at Bellwood Quarry, Donald Lee Hollowell Corridor)
ALL	Transit-Oriented Development	MARTA, Atlanta Beltline, Chattahoochee River-Proctor Creek Corridor
SE	Chosewood Park I	2nd half of land swap transaction with the City of Atlanta, with immediate ground lease back to city through 2023
NE	Madison Reynoldstown	Anticipated 9% LIHTC award, Acquisition and immediate ground lease to JV entity for new construction of 101 units on Atlanta Beltline
NW	University Choice Neighborhoods	Properties in the the UCN footprint and surrounding neighborhoods (ie Vine City, Magnolia Perimeter, Castleberry Hills)

In FY 2020, AH began analyzing its real estate portfolio to identify and prioritize opportunities for development, and potential strategic dispositions. AH may dispose of AH-owned properties that meet the following criteria:

- Due to **changes in the neighborhood**, the property is no longer conducive to residential use.
- Short-term ground leases where the property is **not currently suitable for residential use**, but may be in the future because of speculative real estate market trends.
- Land swap activities for **parcels** that are best suited for housing, **contiguous, or adjacent to** parcels listed in **our short-term project pipeline**.
- The land on which the development exists is **sufficiently valuable** that AH can replace the existing development with an improved development at no cost to HUD.

- **Leasing the property long-term**, where it is more cost-effective or efficient to develop low-income or mixed-use, mixed-income housing.
- The development includes vacant land or non-dwelling structures that **exceeds the need of the development** (after Date of Full Availability--DOFA).
- The **development includes vacant land or non-dwelling structures** that are incidental to, or do not interfere with, the continued operation of the remaining portion of the development.
- AH has otherwise determined that disposition is appropriate and **consistent with its strategic goals**, its MTW Plan and with the U.S. Housing Act of 1937.

AH anticipates submitting the following **Disposition/Demolition applications** to the HUD Special Application Center (**SAC**) in FY 2021.

End of FY 2021 Project Status*				
Quadrant	AH Projects (A — Z)	Disposition	Ground Lease	Demolition
NE	Auburn Pointe, FLP	X		
NE	Capital Gateway, FLP	X		
SE	Carver Homes, FLP	X	X	
SE	Chosewood Park II	X	X	X
NE	Civic Center	X		
NW	Collegetown, FLP	X	X	
SE	Englewood South I	X		
SE	Gilbert Gardens Annex	X		
SW	Harmony at Bakers Ferry	X	X	
NW	Herndon Square II	X	X	
NW	Hollowell Brookview Heights	X	X	
NW	Johnson Road	X		X
SE	Jonesboro South	X		
SE	Lakewood Avenue	X	X	
NE	Madison Reynoldstown	X	X	
NW	Magnolia Perimeter Scattered Sites	X		
SW	Mechanicsville Homeownership	X		
NW	North Avenue / U-Rescue	X	X	
NW	Palmer House	X	X	

End of FY 2021 Project Status*				
Quadrant	AH Projects (A — Z)	Disposition	Ground Lease	Demolition
NW	Scholars Landing Homeownership	X	X	
NW	Scholars Landing IC	X	X	
NW	Scholars Landing II	X	X	
NW	Verbenia Gardens	X	X	X
NW	West Highlands, FLP Homeownership	X		

*Anticipated project status as of June 30, 2021

Other Real Estate Activity

Other real estate planning and development activities include the following:

- **Innovative land use**, including: designing community gardens, urban farming utilization, and other uses of sites in vigorous support of the community
- Exploring the need for HUD waivers where **total development costs** exceed HUD standards because of escalating construction costs, infrastructure, or high-rise construction structured parking.
- Supporting **land trust initiatives** to ensure long-term affordable rents and homeownership throughout the city of Atlanta
- Submitting regulatory waiver requests to **provide the least restrictive regulations to our private and public partners** in accordance with collaboration agreements.
- Allowing for the **expansion of site-based waiting lists** to accommodate each phase of development.
- Consideration to revise or make **exception to existing site and vicinity standards** on a case-by-case basis.
- **Land swap activities** for parcels that are best suited for housing redevelopment and contiguous to or adjacent to parcels listed in our short-term project pipeline.
- **Entering agreements** where AH controlled or owned parcels generate revenue for AH or provide the most benefit to the community. **Revenue generating activities** may include short-term ground leases, rental income from special events, and similar activities. **Community benefit activities** may include converting parcels to a solar energy farm or for educational purposes, or some other max benefit use.

Short Term Activities

In FY 2021, AH may develop and implement **local, non-traditional activities** intended to either increase the efficiency of Federal expenditures, incentivize self-sufficiency of participating families, or increase housing opportunities for households earning up to 80% AMI. These activities may include investment and operating strategies, and AH entering into commercial business ventures, to serve as catalysts for revitalization of public housing and surrounding communities.

In FY 2020, AH began collaborating with the HUD Urban Revitalization Demonstration (URD) and MTW Offices to develop a **short-term Construction Loan program** designed to generate new non-federal funds towards the redevelopment of vacant land on former public housing sites. AH proposed to deploy a portion of its funding reserves as construction loans to mixed-use, mixed-income, and market rate developments. Loan terms will be up to 36 months, with one six-month extension option, and borrowers will be required to pay all interest and loan fees with non-federal funds at the closing of the construction loan. The borrower repays the original principal amount in full at permanent financing.

During the term of the short-term loan, AH will utilize the loan interest and fees to complete predevelopment, due diligence, master-planning, and public infrastructure on several vacant former public housing sites. By FY 2024, AH expects that repayment of the principal loan amounts and plans to utilize it towards completion of public infrastructure and revitalization of former public housing sites, and development of new housing opportunities for families earning up to 80% AMI.

AH is exploring other creative financial mechanisms and partnerships to generate additional funding for the development of new affordable units, and to incentivize self-sufficiency of AH residents. AH seeks to use its MTW authority to collaborate with the URD and MTW teams to **develop a Total Development Cost (TDC) calculation** specific to construction costs and market conditions in its jurisdiction. Partnership opportunities may include **strategic partnerships** or **commercial business ventures** with local and national businesses. These opportunities may include a **demonstration program for workforce training and clean energy**, and the ability to generate substantial revenues to cover increasingly high costs in construction of mid-rise and high-rise buildings, structured parking, and public infrastructure.

AH may also explore the use of **modular construction** and other development techniques and methods in support of innovative, clean energy, and efficient development.

Long-Term Goals and Objectives

Under current AH structure, AH may serve as the master developer for planning and predevelopment activities on any of its development projects. On a case-by-case basis, AH may seek specialty expertise and retain the services of professional consultants. For the development of all public housing sites, the former residents will have a first “right to return” to the site preference.

Other activities that Real Estate Planning and Development may pursue during FY 2021, includes the following:

- Real Estate Development, Project Management, and Asset Management software.
- Preparing a Real Estate Processes, Procedures, and Standard Development Guidelines document.
- Issuing a procurement for a pre-qualified bench of development partners.
- Developing a long-term affordability structure for the homeownership program and employee homeownership/down payment assistance program.
- Self-Development Opportunities.

Activities listed under this element reflect AH goals and objectives that AH anticipates will take longer than 12 months to significantly advance or complete. Planned activities tabled below may utilize the traditional model of private-public development partnership or an alternate development model. AH will continue advancing these goals and objectives as market conditions, strength of real estate and financial markets, and availability of funds allow.

In the table on the next page, several former public housing sites (Englewood, Bankhead, Bowen, North Avenue, Palmer, Mechanicsville, and West Highlands) reflect an end-of-year status further along than other long-term projects. However, it is important to understand that all of these projects are large, complex, and multi-phased projects over a five- to ten-year period. Therefore, financial feasibility and real estate market conditions affect project status.

Long-Term Goals and Objectives Beyond FY 2021																
Sector	AH Projects (A - Z)	Acquisition	Disposition	Ground Lease	Demolition	Remediation	Planning & Due Diligence	Public Infrastructure	Financial Closing	Vertical Construction	Renovations	Lease-up/Sales	Stabilized/Operational	RAD	HomeFlex	Choice Planning Grant
NE	North Avenue/U Rescue		X	X			X	X	X							
NW	Bankhead Courts						X									X
NW	Bowen Homes	X				X	X	X								X
NW	Herndon Square III-V						X									
NW	Hollywood Courts					X	X									
NW	Palmer House		X	X			X	X	X	X						
NW	University Choice Neighborhoods	X														
NW	West Highlands Homeownership		X							X		X				
SE	Chosewood Park II	X	X	X												
SE	Englewood		X	X				X	X	X						
SE	Jonesboro North		X													
SE	Leila Valley		X													
SE	Thomasville Heights	X					X									X
SW	Mechanicsville Homeownership		X							X		X				
*Potential Invest Atlanta Co-Investment Project																

C. Communities: Choice Atlanta

CHOICE ATLANTA, funded by a HUD Choice Neighborhoods Implementation Grant (**CNIG**), is a neighborhood transformation initiative focused on **Housing, People, and Neighborhood**. AH and the City of Atlanta received a 2014–2015 CNIG award of \$30 million to redevelop the former University Homes public housing site (now Scholars Landing) and revitalize the University Choice Neighborhood (**UCN**), a collective highlighting the Ashview Heights, Atlanta University Center, and Vine City neighborhoods.



AH's FY 2021 MTW Plan does not waver from previous plans regarding CHOICE ATLANTA. The Plan includes continuing activities associated with developing Scholars Landing and the UCN revitalization. This work includes AH defining, refining, and modifying, as applicable, its approach to developing and implementing its housing development plans in collaboration with its development partners, the HUD Choice team, and affected residents in order to achieve Choice milestones.

Choice milestones included reaching out to and connecting with former residents of University Homes and extending them an offer to return to Scholars Landing because AH

relocated these residents to demolish University Homes following its HUD-approved demolition.

AH plans to invest funds from multiple funding sources such as—CNIG, MTW Reserves, program income, and other sources—in the transformation of the UCN related to its **Housing, People, Neighborhood** goals and objectives.

Housing

The Housing Plan prioritizes access to high quality mixed-income housing with a focus on redeveloping the former University Homes public housing site. University Homes, built in 1937, was the first federally funded public housing development for African-Americans in the nation. University Homes reached a point of functional obsolescence, and maintenance and repairs were becoming too costly in all cost-benefit analyses. AH demolished the site in 2009. AH relocated all residents of University Homes in 2006 and gave them right of first refusal (“Right to Return”) during the initial lease-up of assisted units at Scholars Landing.

People

The People Plan prioritizes investment in strength-based case management, including work, health, and education services, to support former residents of University Homes, current residents of Scholars Landing, and UCN families with their achievement of individual, or family life-long learning, economic empowerment, and health and wellness goals. The Urban League of Greater Atlanta, Morehouse School of Medicine, and the United Way of Greater Atlanta respectively lead the work, health, and education services in collaboration with Atlanta Public Schools.

Neighborhoods

The Neighborhood Plan builds on the neighborhood assets while addressing blight removal, enhancing public safety and neighborhood appeal, celebrating history and heritage, and improving access to quality amenities, housing, and community facilities. These neighborhood investments are in collaboration with CNIG leads: City of Atlanta and Invest Atlanta, anchor institutions such as the AU Center schools, the Arthur M. Blank Foundation, Westside Future Funds, and other UCN partners. Invest Atlanta serves as the Neighborhood Lead for this component. Neighborhood investments are implemented in collaboration with many partners that include; city of Atlanta, anchor institutions such as the AU Center schools that includes Clark Atlanta University, Morehouse College, Morehouse School of Medicine, and Spelman College, the Arthur M. Blank Foundation, Westside Future Fund, and other UCN partners.

Short-Term Goals and Objectives

Housing

- Support all activities associated with advancing **Scholars Landing Phase III (Ashley IC)**, a multi-family rental property, by Integral Development.
- Support activities associated with **updating the CNIG Housing Plan**, advancing redevelopment plans, engaging third-party consultants, and assessing the need to reconfigure affordable replacement units across the remaining development phases.
- Monitor site-based waiting lists for each phase of Scholars Landing to ensure application of FUH resident Right to Return in future phases of the development.



People

- Ensure Former University Homes (**FUH**) residents continue to have Right of Return during the initial lease-up of new assisted units at Scholars Landing.
- Refine the FUH resident re-occupancy process.
- Continue the **delivery of supportive services** by UCN case managers and partners that connect individuals and families to coaching and counseling, health and wellness, workforce development and employment, early childhood development, after-school, summer, and STEM/STEAM programming, college preparatory and continuing education, and aging-in-place activities.
- Continue **community engagement** activities to support increased participation in the UCN, resident and community capacity building, and civic engagement. Activities may include awarding Choice scholarships and micro-grants, investments in training and mentoring, and conducting outreach activities.
- Update and maintain the Choice website.

Neighborhood

- Continue implementation of the **HUD-approved Critical Community Improvements (CCI) Plan**. The plan utilizes all available funding sources: e.g., CNIG, City of Atlanta, and MTW funds to acquire properties, provide rehabilitation assistance for low-income homeowners, and to increase or contribute to place-making enhancements throughout the UCN.
- Focus acquisitions in the previously defined UCN for mixed-finance, mixed-income housing developments that may include some mixed-use developments as well. Rehabilitation assistance in these neighborhoods focuses on making façade improvements and critical home repairs for eligible homeowners at or below 80% of the Area Median Income (**AMI**). Further, place-making enhancements in the neighborhoods includes planters, landscaping, artwork, streetscape and resurfacing, decorative bus stop shelters, and other enhancements to improve neighborhood corridors.

- Significantly advance the activities that support the adaptive reuse of historic **Roosevelt Hall** in concert with Moody Nolan design firm, where activities include procuring a general contractor for site redevelopment, completing building renovation, and securing a building operator for the only remaining building of the former University Homes.



- Continue to identify potential uses for Roosevelt Hall. Supported design concepts include office space for the Choice Atlanta team and nonprofit/small business leasing opportunities, event rental and community meeting space (that include behind the building and rooftop activation) retail, life-long learning and technology center, and urban garden/health and wellness pavilion.
- Other activities either underway or under consideration include returning to the community event format to educate and bring awareness of benefits and opportunities to residents. This will also include **historical preservation and recognition** to continue work to create commemorative projects and preservation of historically significant structures and events that highlight the UCN's rich cultural and civil rights history.

Long-Term Goals and Objectives

Housing

- Promote mixed-income development in the surrounding area.
- Support all activities associated with advancing **Scholars Landing Phase IV (Ashley—II)**, which includes financial closing and other supportive activities master planned by Integral – Community Development that may include the submission of Low-Income Housing Tax Credit (**LIHTC**), tax-exempt, or new market tax credit application(s). In addition, activities may also include disposition of AH-owned land and public improvement work.
- Advance **Scholars Landing Phase V (Homeownership)**, which may include supporting public improvements and other predevelopment activities carried out by Integral – Community Development.



People

- Continue to collect data and research **incentive programs** to implement in order to increase resident employment and wage earnings, including assistance for training-related expenses, education, and employment. Current incentive examples include income disregards, short-term transportation and childcare assistance, computers, payment of GED testing, purchase of uniforms and tools

for employment, and performing other services that enhance the quality of life for Scholars Landing or UCN residents.

- Continue with the Connect Homes efforts to provide internet access to eligible residents.
- Explore the dynamic of funding and administering an **endowment trust** to continue providing supportive services that benefits residents of the community after the grant term expires.

Neighborhood

- Promote residential and commercial growth in the area through collaborative efforts with CN partners.
- Make strategic investments to attract and retain residents, support community serving facilities and projects that enhance public safety.
- Develop forums that inform residents on sustainability and energy conservation, support urban agriculture, healthy living, and that connect residents to farmers' markets around the UCN.
- Activate Roosevelt Hall to include planned uses that support budding entrepreneurs and start-ups, and that make it a central gathering spot benefitting residents of Scholars Landing and UCN. This work will include collaborating with faculty, staff and students of the AUC schools.
- Provide updates to the CCI Plan, as approved by HUD, to include projects that create a unique sense of place in this historic neighborhood.



D. HomeFlex: AH's Project Based Assistance

AH utilized MTW authority to create and administer a locally designed project-based rental assistance program, rebranded as HomeFlex. Under this program, AH contracts with private multi-family property owners to offer project based rental assistance at their sites on behalf of program participants. This effort creates affordable housing solutions in Atlanta's tight rental market.

AH's HomeFlex programming provides AH with the ability to create or preserve affordable housing units, which increases affordable rental options for low-income families, earning an annual income less than 80% of the Area median Income (**AMI**). AH's HomeFlex Program is directly attributable to the flexibility offered by AH's MTW designation. AH could not have introduced in this housing solution innovation before the MTW Program. The HomeFlex Program works with multi-family property owners and developers to reserve a portion of their rental units for eligible program participants. Typically, up to 50% of the units at family communities can be AH-Assisted and up to 100% at elderly or supportive housing communities. Agreements, short- and long-term (from 2 years up to 15 years), allow limited resources to create rental-housing opportunities at properties or in areas that low-income families might not have otherwise been able to afford or even considered as residence. HomeFlex presents a win-win situation for all parties.

There are three subordinates under the HomeFlex umbrella to maximize affordability:

- **Standard HomeFlex:** designated for multi-family units in AH-owned, Mixed, or Stand Alone privately owned communities. AH may project-base up to 100% assistance at such communities.
- **HomeFlex Older Persons:** designated for buildings or communities that house near elderly (55+) and elderly (62+) residents. These communities may be 100% assisted.
- **HomeFlex Supportive Housing (HAVEN):** designated for property owners/developers that agree to provide housing for a targeted population. Such communities under this category may receive up to 100% project-base assistance.

The HomeFlex Program has supported the creation or preservation of more than 5,000 affordable housing units since its inception. Utilizing its MTW flexibility, AH can project-base up to 100% assistance at communities owned directly or indirectly by AH without competition, which increases the number of housing choices for participant families and helps to reduce the shortage of affordable rental units in the affordable housing stock. In FY 2021, AH plans to create or preserve nearly 100 affordable units through the administration of HomeFlex.

Elements of AH's MTW Agreement provide AH flexibility in the administration of its MTW Project Based Rental Assistance Program. Under those provisions, AH may exceed program cap limits, percentage increases, project cap limits, and similar limitations outlined in Public and Indian Housing (**PIH**) Notice 2017-21 Implementation Guidance: Housing Opportunity Through Modernization Act (**HOTMA**) of 2016 – Housing Choice Voucher and PBV Provisions.

In addition to expanding the availability of quality, affordable housing in healthy, mixed-income communities, AH also created a streamlined alternative process in FY 2019. This alternative process gives AH the ability to consider unsolicited, time-sensitive HomeFlex opportunities earmarked for low-income families or similar considerations in the spirit of Affirmatively Furthering Fair Housing and increasing the affordable housing stock in the city.

Important Note: Although AH is able to exceed cap limits of 25% and 50% in the case of RAD utilizing its MTW flexibilities, AH limits project base rental assistance to 50% at multifamily sites in accordance with its Deconcentration Policy. However, AH may exceed its policy caps on a case-by-case basis as approved by AH's Board of Commissioners.

Short-Term Goals and Objectives

- Continue utilizing MTW flexibilities as a Strategic Tool to create new affordable housing units, preserve existing affordable housing units, and recruit property owners in target neighborhoods (usually higher income) through the administration of HomeFlex subsidies.
 - Create new affordable housing units by project-basing assistance at market rate properties, where rental assistance is non-existent.
 - Preserve affordable housing units at communities where rental assistance exists and the owner sells the property or it undergoes modernization that increases the rental amount. Therefore, AH will explore opportunities to purchase such communities from existing owners that plan to sell or exit the program
 - Recruitment property owners involves issuing standard Notice of Funding Availability (**NOFA**) to owners and developers with properties in target areas, such as Ashview Heights, Atlanta University Center, English Avenue, Vine City, as well as in Tax Allocation Districts adjacent to downtown central business district and other identified areas of opportunity.
- Increase the affordable housing stock within its service jurisdiction, which may include the introduction of a supplemental funding stream, such as a grant, loan, or stipend to help private owners and developers overcome cost barriers that may prevent their property from achieving the Uniform Federal Accessibility Standards (**UFAS**) compliance requirement.
- Consider pursuit of activities to reconcile and update HUD's central repository system (PIC) that enables AH to update data online.
- Continue to refine the HomeFlex Program rent criteria to ensure that it is equitable and attractive for private owners while being financially sustainable and attractive for AH.
- Inform PMD partners that the addition/subtraction of new family members does not constitute a hardship to conduct an income-interim certifications as outlined in Notice PIH 2016-05 (HA) Attachment N: Family Income and Composition: Regular and Interim Examinations and that AH is eliminating interim certifications. Notify

PMDs to continue to review or refer written hardship requests on a case-by-case basis in accordance with AH Hardship Policy.

- Prompt PMDs to remind households submitting a hardship request to do so in writing and include supporting documentation with the written request to ensure full consideration. Hardships may include cases under the Violence Against Women Act (**VAWA**) of 1994, Victim Witness Assistance cases, medical cases, and similar scenarios.
- Continue to redefine the HomeFlex Program rent criteria to ensure that it is financially sustainable for the agency while being equitable and attractive for private owners.

Long-Term Goals and Objectives

- Research alternative funding structures that allows AH participation in HomeFlex projects in different roles and at different junctures as necessary to create, preserve, or recruit affordable housing units. Preliminary roles may include being a lender, a loan servicer, a development partner, and junctures may include before, during, and post transaction.
- Initiate investigative strategies to acquire existing properties from owners planning to sell their properties (or interest) and no longer desire to participate in the HomeFlex Program.
- Consider utilizing AH's HCV waiting list to offer HCV related units, whether TBV or PBV units. This action may significantly reduce the HCV waiting list, which currently consists of approximately 25,000 families.

E. AH-Owned Facilities and RAD Conversions

AH owns 11 public housing communities comprised of nine elderly sites and two family sites totaling 1,586 units. Utilizing its MTW flexibilities AH admits near elderly persons (55 years old and older) at its senior facilities, while continuing to admit elderly persons (62 years old and older) and disabled adults. AH has **implemented the “Smoke Free” policy** at all of its public housing communities.

AH contracts management of its public housing communities and public housing units located in mixed-income communities with Property Management Developers (**PMDs**). AH’s Real Estate Asset and Property Management team ensures administrative and operational compliance, and AH’s Real Estate Construction Management team monitors the maintenance and upkeep of the building and building systems at AH-owned facilities throughout the service jurisdiction.

Rental Assistance Demonstration (RAD)

AH has taken steps to ensure affordable units remain available to eligible families through a recapitalization strategy offered through the conversion of its public housing units to long-term Section 8 PBV assistance under the Rental Assistance Demonstration (**RAD**) Program. AH received a HUD portfolio award to convert more than 3,400 public housing units to long-term Section 8 PBV assistance.

Under this time-defined approval, AH’s real estate teams work collaboratively with development and management partners to complete RAD conversion activities that may range from a simple administrative subsidy conversion to complex modernization and rehabilitation conversion. Conversions may also include third party funding tools, such as Low-Income Housing Tax Credits (**LIHTC**), municipal bonds, as well as private mortgage financing to create feasible, long-term financial sustainable projects.

Because the total number of PBV units in AH’s rental assistance portfolio will exceed 20 percent of AH’s authorized units under its HCV Annual Contributions Contract (**ACC**) with HUD, AH elected to adopt the alternative Choice Mobility option. Under this option, AH will not designate more than three quarters of its turnover Tenant-Based Vouchers (**TBVs**) to RAD PBV families that desire to exercise their mobility. The remaining balance of AH’s TBVs will remain available to address the specific housing needs and priorities of the community.

Converting properties must meet RAD requirements, which affects RAD conversion time. Therefore, AH sets a lower commitment percentage (10% floor) of turnover TBVs early and will increase the commitment percentage annually as more properties convert.

The table below illustrates the “sliding” commitment percentage:

Fiscal Year	Turnover TBV Commitment Percentage		
	RAD PBV Percent*	Community Percent	Total
2021	20%	80%	100%
2022	30%	70%	
2023	40%	60%	
2024	50%	50%	

**AH's commitment percentage of turnover TBVs to RAD PBV families will not fall below 10% and will not exceed 75%*

Short-Term Goals and Objectives

- Inform PMD partners that the addition/subtraction of new family members does not constitute a hardship to conduct an income-interim certifications as outlined in Notice PIH 2016-05 (HA) Attachment N: Family Income and Composition: Regular and Interim Examinations and that AH is eliminating interim certifications. Notify PMDs to continue to review or refer written hardship requests on a case-by-case basis in accordance with AH Hardship Policy.
- Prompt PMDs to remind households submitting a hardship request to do so in writing and include supporting documentation with the written request to ensure full consideration. Hardships may include cases under the Violence Against Women Act (**VAWA**) of 1994, Victim Witness Assistance cases, medical cases, and similar scenarios.
- Administer MTW flexibilities, as applicable, at AH-owned and AH-assisted communities planned for conversion or already converted under the RAD Program.
- Develop an updated RAD strategy for AH's remaining public housing portfolio and portfolio application for submission to and consideration by HUD.
- Monitor administration of Smoke Free policy
 - AH applied for approximately \$250,000 in grant funds under the Emergency Safety and Security Grant Annual Funding Notification to install dual detection devices (replace in cases where only a smoke detection device exists), which detect both smoke and carbon monoxide, at AH-owned facilities. The total installation cost will depend on the amount of the grant award and the cost of the dual detectors.
- Continue NSPIRE 14-day inspection to increase AH-owned unit quality by reducing significant costs for inspection preparation by promoting reinvestment into the property year round.

- Continue conversion of public housing units to long-term Section 8 PBV assisted units under RAD. AH plans to convert the following communities during FY 2021:

PIC ID	Community	Housing Type*	Unit Count
GA 006000530	Hightower Manor	NE; E; Non-E/D	129
GA 006000540	Barge Road	NE; E; Non-E/D	129
GA 006000800	Villages @ Castleberry II	MI Family	114
GA 006000810	Columbia Village	MI Family	30
Totals:	4		402

*NE = Near Elderly (55-61); E = Elderly (62+); Non-E/D = Non-Elderly Disabled; MI = Mixed-Income

Long-Term Goals and Objectives

- Dedicate time to research MTW waivers that will provide AH with the most flexibility to construct or significantly rehabilitate parcels in its real estate portfolio. In addition, AH will continue researching MTW flexibilities to ensure that it maximizes administrative benefits associated with converting public housing units to PBV units under the RAD Program.
- Continue planning the schedule and strategy for AH's remaining portfolio of public housing units for conversion to long-term Section 8 assisted PBV units under the RAD Program.

PIC ID	Community	Housing Type	Units
GA 006000241	Cosby Spear	NE; E; Non-E/D	280
GA 006000250	Georgia Avenue	NE; E; Non-E/D	79
GA 006000300	East Lake	NE; E; Non-E/D	149
GA 006000470	Cheshire Bridge Road	NE; E; Non-E/D	162
GA 006000520	Marian Road	NE; E; Non-E/D	240
GA 006000560	Martin Street Plaza	Family	59
GA 006000830	Ashley Courts @ Cascade I	MI Family	46
GA 006000840	Ashley Terrace @ West End	MI Family	34
GA 006000850	Villages @ Carver I	MI Family	110
GA 006000870	Ashley Courts @ Cascade II	MI Family	41
GA 006000880	Villages @ Carver II	MI Family	33
GA 006000900	Ashley Courts @ Cascade III	MI Family	29

PIC ID	Community	Housing Type	Units
GA 006000910	Villages @ Carver III	MI Family	108
GA 006000930	Ashley CollegeTown I	MI Family	78
GA 006000970	Capitol Gateway I	MI Family	89
GA 006000990	Capitol Gateway II	MI Family	49
GA 0060001020	Villages @ Carver V	MI Family	78
GA 006001040	Veranda @ Auburn Pointe	MI Family	38
GA 006001070	The Gardens at CollegeTown	MI Family	26
GA 006001080	Ashley Auburn Pointe	MI Family	54
GA 006001090	Ashley CollegeTown II	MI Family	70
GA 006001110	Ashley Auburn Pointe II	MI Family	51
GA 006001070	Atrium at CollegeTown	NE; E; Non-E/D	76
GA 006001080	Magnolia Park I	MI Family	87
GA 006001090	Magnolia Park II	MI Family	73
GA 006001110	Westminster	Family	32
Total:	26		2,171

**NE = Near Elderly (55-61); E = Elderly (62+); Non-E/D = Non-Elderly Disabled; MI = Mixed-Income*

Four sites totaling 268 public housing units are not listed in AH's portfolio award; however, AH plans to include these sites and any other eligible sites in its next portfolio conversion application so that it can convert these units with other HUD-approved units.

F. Housing Choice: AH's Tenant-Based Assistance

The city of Atlanta has a highly competitive real estate market that AH expects will continue in FY 2021. Population increases to the city and limited affordable housing units make it difficult for low-income families to find units in their affordable price range. Despite this market, the HCV Program helps tens of thousands of families with rental assistance. This assistance helps families increase their number of choices for housing citywide and reduces instances of these families having to choose between substandard housing and super high rents to live within the city limits. Regardless of where program participants choose to live, the HCV Program ensures that selected housing is within defined payment standards and meets, at minimum, Housing Quality Standards (HQS).

AH, housed more than 1,500 families in FY 2019, and projections exceed that number in FY 2021. Nonetheless, AH continues to explore multiple approaches to market its HCV Program, increase the affordable housing inventory/selection, and stretch its voucher funding to help more families. These planned approaches blend the differences between single-family and multi-family properties, new property owners and seasoned property owners, as well as tenured property owners that demonstrate a reliable record of housing participants.

Housing Choice Vouchers (HCV)

Beyond issuing and monitoring tenant-based vouchers (TBVs), AH's HCV Program handles eligibility screening, program intake, annual re-certification, and program termination. Several **Tenant-Based Initiatives**, including special program vouchers that address unique needs of at-risk populations. Specialty vouchers include:

- **Family Unification Program (FUP)** is a HUD allocation of **300 vouchers** to support unification efforts of former foster care youth and families or children at-risk of separation because of their housing situation.
- **FLOW** is a **commitment to 675 households** that have successfully transitioned from a Permanent Supportive Housing (PSH) environment to an independent living environment, requiring "light touch" case management and supportive services.
- **Georgia Housing Voucher Program (GHVP) Conversion** is a **housing solution in partnership** with the Georgia Department of Behavioral Health and Developmental Disabilities (DBHDD) for persons with mental health and developmental disabilities, outside of an institution setting. Implementation is primarily lease-in-place and set-in-place because of the 2010 Settlement Agreement that supports the 1999 US Supreme Court's Olmstead decision.
- **Special Program Voucher for Homeless Students (SPVHS)** goal is to stabilize external factors that enable students' academic success. Therefore, AH provides **50 vouchers** for Atlanta Public School (APS) homeless students and their families.
- **Housing First Voucher (HFV)** provides vouchers based on a "Housing First" model proven successful in reducing homelessness. AH provides **100 MTW vouchers** for families affected by the closing of the Peachtree and Pine Men's Shelter.

- **Integrated Care Permanent Supportive Housing (ICPSH)** is a housing choice program in which AH and Partners for Homes/Mercy Care have collaborated to develop a Continuum-of-Care (**CoC**) funded and integrated care pilot aimed at housing **more than 30 chronically homeless individuals** with complex medical and behavioral health needs, and who routinely engage with emergency systems.
- **Mainstream One and Five Program** are **17 special vouchers** that assist both elderly and non-elderly persons with disabilities as identified at the time of certification.
- **Veteran Affairs Supportive Housing (VASH) Voucher** is a collaborative initiative with Veterans Affairs (**VA**) and HUD. AH administers **270 VASH vouchers** and continues to explore the feasibility of implementing a project-based approach or other programming options to maximize housing opportunities.

HAVEN is AH's supportive housing component, leads program referrals and monitoring of the special program vouchers listed above.

Also, in line with re-engineering AH's HCV Program, AH's leadership team continually reviews and streamlines its HCV Program operating policies and processes to ensure alignment with AH's current business model and industry best practices. Our aim is to eliminate administrative burdens that delay voucher issuance and unit lease-up times. AH plans to use its MTW flexibility to restructure its interim certification process for all rental assistance programs by prohibiting interim certifications 90 days before and 90 days after a participant's annual effective recertification date. AH limits income interim certifications to hardships only. Hardship examples also include situations protected under the Violence Against Women Act of 1994 (VAWA) victim witness assistance, medical cases, and similar situations. In accordance with AH's hardship policy, AH will review and consider the each hardship on a case-by-case basis.

Short-Term Goals and Objectives

- Continue administration of MTW flexibilities that support a minimum rent, modify submarket payment standards, enhance inspection standards, and review rent reasonableness and rent simplification, while continuing to carry out activities associated with re-engineering and revitalizing the HCV Program and ensuring program participants meet the work/program requirement.
 - AH reduced the work requirement from 30 hours per week to an average of 20 hours per week. The reduction in the Work Requirement hours was made to be consistent with our local labor market, where many part-time jobs provide fewer than 30 hours of work per week. This change benefits the resident and will reduce the time AH spends on program terminations, grievance hearings, and program reinstatements.

- Notify staff and residents that the addition/subtraction of new family members does not constitute a hardship to conduct an income-interim certification as outlined in Notice PIH 2016-05 (HA) Attachment N: Family Income and Composition: Regular and Interim Examinations and that AH is eliminating interim certifications. Inform staff to continue to review or refer written hardship requests on a case-by-case basis in accordance with AH Hardship Policy.
- Strongly encourage staff to remind households that submit a hardship request to do so in writing and include supporting documentation with the written request to ensure full consideration. Hardships may include cases under the Violence Against Women Act (**VAWA**) of 1994, Victim Witness Assistance cases, medical cases, and similar scenarios.
- Increase the Special Program Voucher for Homeless Students by 50 vouchers to continue to grow with Atlanta Public Schools' referral demand.
- Implement Case Management Software for both HCV Program and other AH housing programs. AH expects the planned software change to improve operational productivity and program effectiveness under the case management model that it moved to in FY 2019.

Long-Term Goals and Objectives

- Closely monitor work/program requirement metrics and local job market changes to determine feasibility of increasing the work requirement incrementally over time. Potential changes to the work/program requirement and relatable parameters will consider collected data, along with the success of participants meeting the requirement, in order to align with applicable employment practices and laws, and AH's business model.
- Explore rent bands or rent steps in addition to a minimum work/program requirement, so that these policies may appear less punitive to program participants entering or re-entering the workforce, and may potentially incentivize program participants to earn more income and may reduce the number of rent adjustments processed by AH's HCV staff.
- Explore program incentives for participants entering the workforce for the first time or returning to the workforce after an extended period of unemployment (six months or longer).
- AH anticipates implementing parts of the Housing Opportunities through Modernization Act (**HOTMA**) guidance issued during AH's 2020 fiscal year.

G. Homeownership Assistance

AH developed its Down Payment Assistance (**DPA**) Homeownership Program to increase housing choices for moderate-income families positioned to purchase a home. The Real Estate Investments and Transactions team administers the DPA Program.

Initially, the DPA Homeownership Program focused on areas around HOPE VI sites¹, but AH has since expanded the program's focus citywide. The DPA Homeownership Program gives priority and a higher level of assistance to qualified professionals and para-professionals in education, public safety, and healthcare fields, as well as families formerly assisted by any of AH's rental assistance programs. Families receiving an AH DPA award can combine the award with other down-payment assistance sources to maximize affordability in purchasing a home within AH's service jurisdiction.

Since program inception, the DPA Homeownership Program has assisted more than 1,100 families achieve their dreams of homeownership. AH projects that it will provide DPA to more than 350 families during FY 2021. The table below shows AH FY 2021 projections:

DPA Homeownership Program At-A-Glance					
DPA Category	FY 2017	FY 2018	FY 2019	FY 2020*	FY 2021^
Number of Families Assisted	76	149	265	306	383
Avg. DPA Award	\$17,687	\$21,407	\$20,916	\$20,003	\$20,003
Avg. Household Income	\$41,454	\$41,932	\$42,828	\$44,734	\$42,737
Area Median Income	\$67,500	\$69,700	\$74,800	\$79,700	\$84,250
Avg. Home Price	\$142,792	\$155,022	\$166,486	\$179,673	\$160,993
Priority Professionals (%)	24%	34%	26%	26%	28%

*Data Source: DPA Smart Sheet as of October 31, 2019 and extrapolated by MTW Office through June 30, 2020

^Data Source: DPA Smart Sheet analyzed and projected out by MTW Office through June 30, 2021

Short-Term Goals and Objectives

- Continue to administer MTW flexibilities that support the comprehensive homeownership program, the development of alternative supportive housing resources, support the single-family home rental demonstration, and similar activities designed to increase housing choices for low- to moderate-income families in AH's service jurisdiction.
- Investigate and consider a down payment assistance or mortgage program for vested AH employees and long-term contractors.

¹ HUD program to transform public housing and lessen concentrations of poverty through mixed-income communities.

- Administer and implement underwriting activities and DPA Homeownership Program requirements in accordance with current policies and procedures.
- Update underwriting activities and DPA Homeownership Program requirements by aligning policies and procedures with current market needs and industry standards.
- Target homes in the West Highlands (formerly Perry Homes) development and other appropriate areas representative of AH's mission.
- Support community-housing initiatives, such as Project Shield, in accordance with intergovernmental agreements and agency direction.
- Update program requirements by modifying policies and procedures.

Long-Term Goals and Objectives

- Continue to explore opportunities to streamline processes while increasing the number of opportunities to serve families with the same level of funding.
- Consider all elements or parts of the Housing Opportunities through Modernization Act (**HOTMA**) guidance issued during AH's 2020 fiscal year.
- Continue researching efforts that increase homeownership, and propose solutions that improve housing affordability in accordance with intergovernmental agreements and agency direction.

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SECTION II: AGENCY PRIORITIES



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A. Human Development Overview

AH's priorities for FY 2021 continue to include measures that **expand economic, educational, and wellness opportunities for program participants through community partnerships focused on self-sufficiency and supportive services**. AH supports community development and promotes self-sufficiency. Economic opportunities include the construction and significant rehabilitation of affordable housing units, which are often the source of the largest investment in a community and provide the best opportunity for local residents to gain employment in a project that revitalizes their neighborhood.

As part of the strategy to stabilize families and foster advancement, AH recognizes the pervasiveness of income inequality in Atlanta and makes every effort to provide learning incentives from training referrals to scholarship and internship offerings, among others. In addition, AH reviews strategies that promote self-sufficiency, active aging, healthy lifestyles, and other activities to improve the quality of life for participants.

AH's Human Development team recognizes that alone, no one is successful. Consequently, AH embraces collaboration with government agencies, community organizations, private sector entities, philanthropic groups, and others to facilitate service delivery, leverage resources, and deliver a coordinated service approach. These efforts are part of a defined **Service Delivery Model** that allows residents to have access to services that are:

1. **Responsive.** Provide timely and appropriate services grounded in a standard assessment that identifies and evaluates a participant's strengths, resources, goals, barriers, and needs in order to develop an individualized service plan that supports a family's ability to progress toward economic independence and housing self-sufficiency.
2. **Efficient.** Implement and administer a streamlined practice by staff and service providers to ensure that a defined and consistent service is available to all residents in order for them to have an opportunity to develop and move closer to reaching their full potentials.
3. **Impactful.** Monitor and evaluate service outcomes regularly to assess performance, analyze the impact of investments, and identify innovations that create or enhance areas of opportunity, while modifying innovations that do not create or enhance.

AH will continue outreach and efforts to facilitate family progress toward self-reliance, promote youth advancement and support successful aging at home.

B. Human Development Services

AH's human development team supports AH-owned sites and Housing Choice Voucher (HCV) families by creating and executing Community Outreach Plans and informing stakeholders of AH activities. Community Outreach Plans include the following:

1. Set outreach goals
2. Identify target audiences
3. Develop activities to reach target audiences
4. Implement the plan
5. Evaluate the outcome

AH plans to continue existing community engagement projects, while including new activities, as appropriate, for residents and AH staff.

1. Family Independence

AH strongly believes that work provides value, dignity, and economic independence. Therefore, AH continues to implement MTW Activity: AW.2005.03 – Work/Program Requirement for all work-able adults, non-elderly, and non-disabled adults in all programs.

During FY 2021, a goal of AH's work requirement is to assist unemployed and underemployed work-able adults to make the transition from public assistance to productive employment, to economic independence, and to housing self-sufficiency (rental assistance free).

Short-Term Goals and Objectives

AH will continue to leverage partnerships with for-profit and non-profit corporations, foundations, educational institutions, and other organizations to deliver the following services:

- **Aging at Home.** This service is committed to promoting aging at home, for AH's senior participants. In connection with community partners, AH will provide additional home, and community-based services focused on safety, hygiene, nutrition, and other activities of daily living for senior participants in order to help them maximize their quality of life.
- **Essential Skills and Employment Preparation Training.** This service may continue to include or add (as appropriate), adult literacy, GED and post-secondary opportunities, job training and skills development, entrepreneurial training and executive skills functions, or coaching to assist volunteer participants to increase their employment marketability
- **Financial education and resource management.** Under this service, residents and community participants are educated on financial topics such as asset building, banking, budget development, credit and its direct and indirect affects, and other financial counseling to increase financial competence and independence.

- **Job search and placement assistance.** The primary goal of this service is to connect participating residents to employment opportunities, and thereby help employers to secure the skilled labor that they need.
- **Job coaching and retention support.** This service builds on the aforementioned service by providing ongoing support and coaching to help residents maintain employment by helping them to navigate and resolve job-related challenges.
- **Life skills training.** Under this service, residents and community participants undergo life skills development, such as an introduction to soft skills, problem solving and goal setting, effective communication and conflict resolution, and other training designed to help residents fulfill their family obligations. In addition, all new participants and some existing participants are required to attend the Good Neighbor Program. This community-based model makes training convenient to participants and offers the following concepts:
 - Building effective tenant-landlord relationships
 - Improving self-reliance and personal responsibility
 - Fulfilling civic responsibilities and community engagement
 - Homeownership preparation
 - Parenting for all parental roles, such as new, grands raising grandchildren, partial- or full-custody parents, and parents returning to the home.
 - Comprehensive training for youth
- **Self-sufficiency / Supportive services.** This service directly reflects efforts of AH's sponsored Family Self-Sufficiency (**FSS**) Program, which works closely with service providers in partnership to develop life skills that help voluntary program participants move closer to economic independence and housing self-sufficiency. In addition, AH also works closely with supportive service providers to offer or combine case management, service navigation, and coaching efforts in order to assist families that require defined assistance to help them meet their obligations and goals.
- **Youth Development.** Under this service, AH provides access to high quality learning opportunities through collaborations with community partners in order to provide life skills workshops, after-school programming, and summer camps. AH will also work to provide access to training and youth employment opportunities as a key component to help break intergenerational poverty.

Long-Term Goals and Objectives

- Continue exploring other opportunities with for-profit and non-profit corporations, foundations, educational institutions and other organizations to deliver family services.

C. External Affairs

1. HAVEN

AH created its HAVEN Program to support families and individuals facing housing instability. In partnership with multiple civic agencies, AH continues to employ project-based rental assistance at AH-owned properties without competition by utilizing HUD-approved MTW Activities RE.2006.02 – Project-Based Rental Assistance Site-Based Administration and RE.2007.02 – Project-Based Rental Assistance as a Strategic Tool. Through administration of these activities, AH is able to create more housing choices for participants by increasing the number of property owners who accept rental assistance payments. These innovative efforts pool resources and is locally known as **HomeFlex for Supportive Housing**.

Based on the expanded authorizations, the AH Board of Commissioners established project-base assistance limits at properties in which AH has an interest. Therefore, AH's Board of Commissioners may elect to exceed project cap limits—currently 25% (50% in the case of RAD)—, at AH-owned properties without competition, whether owned directly or indirectly by AH. This MTW flexibility permits AH to provide housing solutions for targeted populations that it may not otherwise be able to serve without this MTW flexibility. In addition, AH may exceed program cap limits, percent increases, project cap limits, and similar limitations as outlined in the Housing Opportunities Through Modernization Act (**HOTMA**) based on prior HUD approval of AH's MTW Agreement and applicable PBV Program waivers. In addition, AH created specialty vouchers that fall into many of the exceptions outlined in HOTMA.

In alignment with Atlanta Continuum of Care, AH utilizes HUD's Homeless Management Information System (**HMIS**), specifically called ClientTrack in Georgia, and plans to continue offering specialty vouchers during FY 2021. These vouchers already address local housing solutions for specific population groups and provide over 2,000 households the opportunity to live and thrive in safe, affordable housing.

Response to local needs through partnership

Through program implementation, grant award, or innovation, AH administers a number of supportive housing programs targeted to populations facing housing instability. These programs are administered by AH's HCV Program and are monitored by AH's Community, Governmental and External Affairs business unit.

Health and Housing is a collaboration between AH, Partners for HOME (the *Atlanta Continuum of Care*), Mercy Care, Grady Health Systems, and the United Way of Atlanta. This team uses the integrated care model, an increasingly national approach to supportive housing. AH's Integrated Care for Permanent Supportive Housing (**ICPSH**) effort serves chronically homeless individuals with complex medical and behavioral health needs, and who routinely engage with emergency systems. The ICPSH will operate to provide stable housing with wrap-around case management under a 6-member, multi-dimensional team for intensive, participant-led, in-home services and referral-based support. This program started with 32 participants and seeks to increase the number of participants annually

funded under a HUD-Continuum of Care grant award. Identified services may include education, employment, mental health counseling, substance abuse counseling and similar services that—

- Address the housing needs of chronically homeless individuals
- Improve the behavioral, emotional, and social aspects of persons served
- Demonstrate an overall cost savings to emergency services and systems, by reduced ER visits, fewer EMS dispatches, lower county jail intakes, etc.

HomeFirst, launched with a City of Atlanta commitment of \$25 million dollars and matched dollar-for-dollar by philanthropic dollars through the United Way Regional Commission on Homelessness, is a partnership created to capitalize on the community's 5-year strategic plan to reduce chronic homelessness in Atlanta. Prompted by the closing of Atlanta's Peachtree-Pine shelter, which was Atlanta's largest shelter, AH joined the citywide effort in FY 2019 to address housing needs by committing to deliver permanent supportive housing (**PSH**) units throughout the city. Representative of this effort and commitment, AH expanded its HomeFlex for Supportive Housing initiative, by which it will project-base assistance at new developments or stand-alone communities that agree to create PSH units under HAVEN Vouchers with wrap-around services.

Mainstream Vouchers, also known as HUD Section 811 vouchers, are a tenant-based program for at-risk families. These vouchers provide stable housing for eligible families where the head-of-household, spouse, or sole member is a non-elderly person with disabilities. Local health and human service agencies collaborate under this special voucher program, and identification and referrals come from the Partners for HOME coordinated entry system. Overarching goals align with the Americans with Disabilities Act (ADA) of 1990 to help persons with disabilities live in the most integrated setting possible.

RISE-II Permanent Supportive Housing (PSH) Program is a collaboration with Partners for HOME and CaringWorks, Inc., the latter being a service agency sub-grantee with Partners for HOME that serves chronically homeless men and women with mental illness or substance abuse disorders. This program employs the Housing First model with harm reduction using AH MTW vouchers to provide stable housing with intensive wrap-around supportive services. CaringWorks, Inc. administers a "Dedicated PLUS" project, where 100 percent of the beds are dedicated to serve individuals or families in which at least one adult or child has a disability. A dedicated team develops a person-centered plan that includes case management and mental health therapy, and that details goal that encourage housing stability and thriving within the community.

Ongoing HAVEN Initiatives

Home Again, another strategic housing tool to prevent homelessness, is AH's short-term housing assistance program to help families overcome minor emergencies that put families at the risk of losing their housing, or assists them in moving from a transitional housing setting to an affordable private rental setting. This tool is an increasingly vital community resource and administered in collaboration with the United Way Regional Commission on Homelessness, which serves as the Service Coordinator, fiscal agent, and liaison between local service providers and eligible families.

HomeFlex, specifically known as HomeFlex for Supportive Housing, is AH's ongoing MTW activity that uses project-based rental assistance as a strategic tool to provide units for an assorted population, including disabled adults, recovering adults, and similar specialty populations that AH would not be able to specifically serve otherwise without its MTW designation. Existing vacant units or newly constructed units are filled by referral through the Partners for HOME coordinated entry system. AH subsidizes more than 600 units under the HomeFlex for Supportive Housing Program and anticipates supporting additional units designated as HomeFlex for Supportive Housing during FY 2021.

Tenant-Based Initiatives address unique needs of at-risk populations that share a common need for safe, affordable housing. AH discusses tenant-based activities at greater length in the section related to the Housing Choice Voucher Program.

2. Health and Wellness

AH prioritizes giving elderly and disabled families the option to live independently in an integrated setting for as long as possible. To accomplish this, AH provides residents with access to programs and services that enable them to age with dignity and maintain a high quality of life. AH continues to enhance its Aging Well Program for senior and disabled residents, and continues to engage similar households in the HCV Program.

Resources for residents

Commodity Supplemental Food Program (CSFP) is an enrollment program facilitated by AH for residents of high-rise communities to receive a monthly issuance of non-perishable food items through an ongoing partnership with the Atlanta Community Food Bank and onsite Property Manager-Developer (**PMD**) Resident Services staff. This effort supports AH's Aging Well strategy. Components of this strategy include the following:

- **Atlanta Senior Day** is an annual event hosted by AH in collaboration with Playhrd-Trainhrd and Future Foundation at the Home Depot Backyard at Mercedes-Benz Stadium, which includes live fitness sessions, healthy cooking demonstrations, wellness vendors, and related activities free of charge to AH residents.
- **Health and Wellness** is another event featuring vendors and agencies with products and services focused on the wellbeing of AH's senior population. Fairs rotate on a regular basis between AH-owned high-rise communities.
- **Holistic Wellness** is a collaborative effort with ANIZ, Inc., a holistic provider, and sponsored monthly by AH to provide educational sessions on an assortment of health and wellness topics. Topics promote emotional and physical wellness by providing mental health services, substance abuse counseling, supportive services, and health education to senior and disabled residents.
- **Senior Sock Hop** is an annual engagement opportunity for fun, physical exercise at AH's senior high-rise communities coordinated through respective PMD Resident Services staff.
- **Seniors' Farmers Market** is an annual, outdoor event that engages attendees with live entertainment, games, healthy cooking demonstrations, and timely information, while providing access to free fruits and vegetables.

- **Take-A-Walk Campaign** is a collaborative effort with Kaiser Permanente, where Kaiser Permanente facilitates health and wellness education sessions at select sites.

3. Education and Student Achievement

AH's goal is to ensure that all youths living in AH-assisted households have access to quality education, training, and supportive services that contribute to success in educational and vocational endeavors. Below are few highlighted activities:

- **Boosting Scholars.** Nearly 40% of AH residents are minors. AH proudly continues to support the futures of these youth by marketing and supporting scholarship awards offered by various industry agencies, the Housing Authority Insurance (HAI) Group, the University Choice Neighborhood Scholarship (UCNS), and AH's signature program, Atlanta Community Scholars Award (ACSA). In addition, AH continues to support the AH Internship Program designed for rising high school seniors and college students.
- **College Preparatory Program.** AH continues to explore launching this effort in partnership with the Scholarship Academy, whereby this effort will focus on 1) a College Recruitment Fair and 2) in-house tutoring program. Preliminary outcomes for the Fairs include national, regional, and local colleges and universities reaching at least 400 AH-assisted households. The in-house tutoring program envisions helping ≥50 households research, apply for, and secure college aid, including scholarships, grants, forgivable loans or sponsorships, and student loans.
- **Education Support Partnership.** Also known as "Building Blocks for Success," this program adds support to the PEOPLE element of the Choice Neighborhood - CHOICE ATLANTA Initiative ([page 45](#)). The PEOPLE Plan provides direct support to the four Atlanta public schools fed by CHOICE ATLANTA neighborhoods, or located within the CHOICE ATLANTA boundaries. The "Building Blocks for Success" concept endorses and promotes good attendance habits, encourages attendance monitoring, supports interventions with students having attendance problems, and advocates assessment of intervention effectiveness by collaborating with APS, families, service providers, and benefactors.
- **Financial Literacy.** Commonly referred to as "Where My Money Goes," this program provides educational and informational sessions led by a community partner. It is designed to help high-rise residents develop, improve, or strengthen financial skills.
- **Literacy Resources.** AH and Atlanta-Fulton Public Library System collaborate so that, under the program, representatives from the library system attend various AH events, to inform both AH residents and staff about the vast resources offered by the library system.

4. Volunteerism

AH cares about its residents and its standing in the community. AH created its volunteer program, **AH Cares**, to give AH staff, family, and friends the opportunity to participate in AH-sponsored events. Volunteer opportunities include everything from simple, local clean-up events to complex, community service activities.

Another aspect of volunteerism includes mentoring. Under the **AH Mentorship Program**, AH garners support for ACSA and CHOICE ATLANTA college scholarship recipients. AH connects staff volunteers with each scholar in the program to mentor and offer support through this new phase of life. Mentors engage with assigned mentees on a regular basis over a two-year period. AH seeks to increase the number of mentors by two mentors.

AH maintains an **internal clothing bank** that facilitates clothing donations from AH staff and other community sources. Clothing donations are available to AH-referred households to help household members improve their self-image and increase their self-confidence in preparation for professional meetings, including education and employment interviews.

SECTION III: AGENCY PRIORITIES



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Streamline Service Delivery Approaches and Financial Protocols

Through its MTW flexibilities, AH has positioned itself to ensure long-term financial sustainability by designing innovative strategies to reduce costs and maximize efficiencies. One of the innovative strategies AH has employed is rolling its funding sources into a Single MTW Fund. The Single MTW Fund increases AH's ability to provide affordable housing solutions throughout its service jurisdiction, which strengthens community collaborations and supports neighborhood stabilization efforts. This ability also gives AH an advantage in investment opportunities and grants access to funding to maintain existing public housing and affordable housing units that would otherwise not be accessible without its MTW designation. While the Single Fund has been sufficient for most of AH's development and activities in the past, AH forecasts a requirement for additional non-Federal funds in the near future. In FY 2021, AH will continue active searches for conventional and non-conventional funding sources, including competitive federal and foundation awards, and entrepreneurial opportunities.

Optimal utilization of funding requires that AH examine its two major uses of fund: expenditures and investments. Expenditures includes our housing subsidies, operation of AH-owned assets and AH overhead. AH continues to explore strategies and techniques to reduce operational overhead, streamline service delivery approaches, and update financial policies and protocols to ensure consistency with best practices. Investments include the acquisition of new assets to improve AH's long-term financial sustainability; AH will continue to proactively identify and rigorously manage its real and financial investments to create returns to reinvest in opportunities aligned with our goals and objectives.

A. MTW Programs and Single-Fund Flexibility

1. Gap Assistance Financing Funds (GAFF)

AH continues to identify utilization of funding innovations that utilize its Single MTW Fund flexibility. Pursuant to its MTW Agreement and HUD's approval, AH established a policy to provide Gap Assistance Financing (GAFF) to leverage development deals, as well as utilize MTW funds for the purposes of increasing housing choices in a competitive housing market for low-income families.

Another purpose of GAFF is to permit AH to participate in deals in different roles, and enter deals at different intervals. As noted throughout this Plan and in previous MTW Plans, Atlanta is experiencing a development renaissance and annual population increases for most of the decade. However, much of the completed and planned development overlooks the affordable housing market. Most extremely low to moderate-income households that call Atlanta home are faced with the bleak prospect of choosing between sub-standard housing, paying more than 40, even 50 percent of their income towards housing costs, or living outside the corporate limits with limited to no access to public transportation and amenities. These reasons prompted AH to devise a creative solution that would assist in the creation of more affordable housing units within the city.

Further, AH owns several hundred acres and seeks to catalyze development. Current methods leave AH with little to no control in the process and AH needs to diversify its real estate portfolio, as well as create or enhance, areas of opportunity under its control.

With the ability to **close gaps or co-invest** in deals, AH can move closer to having more structure and timeline control, while continuing aggressive searches for opportunities that make sense, or ones that allow AH to maximize its impact at any point in the process, from concept to completion. To achieve maximum success, AH must continue its collaborative approach to investing funds and be able and willing to leverage resources.

Short-Term Goals and Objectives

- Continue strengthening partnerships with lending institutions in order to access low-cost private equity/debt financing instruments.
- Develop or update standard processes to identify, underwrite, and structure project investments while establishing portfolio-wide parameters to manage risk.
- Retain existing and recruit new stakeholders by entering mutually beneficial agreements targeting new opportunities that have revitalization potential.
- Continue to increase proactive efforts to raise capital for public infrastructure and other project costs not always conventionally and conveniently financed.

Long-Term Goals and Objectives

- Improve GAFF to replace the HOPE VI Grant Program, while augmenting the affordable housing stock within its service jurisdiction.
- Focus on plans to increase AH's capacity to invest in the development process at any point, from concept to completion while developing its capacity to close financing gaps that delay, significantly postpone, or terminate project success.
- Investigate expanding real estate investments and transactions beyond what AH owns to become a primary partner in residential and commercial projects.
- Develop long-term mechanisms for the preservation or production of affordable housing, which mechanisms may include creating multiple loan funds for acquisition capital, bridge financing, or a stabilization fund to spur economic development.
- Build local capacity among small and disadvantaged developers while acquiring sites, vacant or occupied, that meet AH's mission and make sense financially and operationally.
- Facilitate plans that reduce or prevent displacement of low-income families.

2. Local Blended Subsidy Tool

In an effort to meet the high demand for affordable housing units in Atlanta, AH continues exploring methods to provide rental assistance to support the creation, preservation, or recapitalization of affordable units, while aggressively pursuing revenue streams for the construction of new units or redevelopment of former public housing sites.

As the affordable housing shortage in Atlanta grows, AH continues to investigate the feasibility of exercising the “Faircloth Limit” under Section 9(g)(3) of the United States Housing Act of 1937. Under the Faircloth Limit, AH is limited to the construction of new public housing units up to the unit count that AH owned, assisted, or operated as of October 1, 1999 (9,114). In addition, HUD will not fund the construction or operation of new public housing units with capital or operating funds if the construction of those units exceeds the original number.

Because HUD will only fund the construction or operation of new public housing units up to AH’s Faircloth Limit, AH has created a Local Blended Subsidy (**LBS**). The LBS Tool allows for the new construction of public housing units and utilizes MTW funds to bridge the subsidy gap between the Section 9 operating subsidy and rent amounts that allow a project to operate successfully. AH may utilize the LBS Tool to build and operate new public housing units to its Annual Contributions Contract with HUD up to its Faircloth Limit. Once operational, the LBS developments may convert to project-based voucher assistance under RAD. AH acknowledges that it will need to secure additional funding if it decides to build new units that exceed its Faircloth Limit.

A preliminary application of this tool may resemble AH requesting capital and operational funds from HUD to construct new public housing units on AH-owned or controlled land. AH may elect to add funds from other sources, including MTW Block Grant, or through collaborative channels to create a mixed-income community not to exceed approved caps in its Deconcentration of Poverty Policy.

Short-Term Goals and Objectives

- Initiate cost-benefit analysis of adding new public housing units under current HUD requirements to construct and operate new public housing units.
- Upon making a determination to add new public housing units, AH will review MTW flexibilities needed to modify applicable HUD regulations to streamline construction and operational processes and costs for AH and its development partners.
- Implement LBS Tool on one or two pilot projects.

Long-Term Goals and Objectives

- Refine LBS Tool and regulations, and continue to implement LBS Tool to develop affordable units.

3. Self-Development Entity

Currently AH owns over 400 acres of real estate within the city limits, and desires to further its mission of helping low-income families while increasing its self-development capacity to enhance its role in the development arena, including property management and ownership. The Georgia Department of Community Affairs (**DCA**), which serves as the Housing Finance Agency (**HFA**) for the state, has established new application thresholds for the Low-Income Housing Tax Credit (**LIHTC**) Program. One of thresholds established requires that qualified applicants must have developed or owned five LIHTC projects with at least a 20 percent equity position, to serve as a general partner and be able to self-develop.

AH created a development affiliate through its Real Estate Development Group and continues efforts to enhance its self-development capacity in an effort to position itself to be competitive in future LIHTC competitions. Efforts include modifying its approach to due diligence and structuring new construction and significant rehabilitation LIHTC deals, while leading redevelopment and modernization projects at AH-owned sites. The benefits of increasing this capacity are instrumental in focusing AH's mission while allowing AH to maximize cost efficiencies and enhance its development strategy that would otherwise be unavailable to AH without being able to self-develop.

Short-Term Goals and Objectives

- Continue to build capacity to obtain and maintain self-development status by participating in projects as co-developer and general partner.
- Continue to move forward with predevelopment of AH-Owned sites in the event AH elects to self-develop.

Long-Term Goals and Objectives

- Continue to build capacity to maintain self-development status.
- Review revenue opportunities by serving as a developer or management consultant to other PHAs pursuing a self-development entity.

B. Contracts and Procurement

1. Empowering Low-Income Workers and Small Businesses

Whether in collaboration or individually, AH's development activities are often one of the largest sources of economic activity within a given neighborhood. These events are significant and have a tremendous impact on the city of Atlanta. New construction, significant rehabilitation, and modernization projects create economic opportunities for individuals and businesses. All three phases can create a lasting financial impact on residents continuing beyond project completion. With these benefits in mind, AH deliberately tries to create employment and contracting opportunities for program participants and small businesses to thrive.

Section 3 of the United States Department of Housing and Urban Development (HUD) Act of 1968 requires that, to the greatest extent feasible, recipients of HUD funding will provide jobs, training, and contracting opportunities for low-income people and businesses owned or controlled by such individuals. Because AH's primary source of funding comes from HUD, and AH has direct access to a number of low-income individuals, AH will continue to aggressively seek capable, qualified low-income individuals for potential employment positions, job training activities, and contractual opportunities.

In FY 2020, AH began encouraging contractors to contribute to a Section 3 training fund. The funds from these contributions will provide direct training to program participants and address Section 3 business concerns. Developers and contractors commit funding for program participants through a separate fund. In strategic partnership with several service providers, AH continues to search for and identify businesses that are willing to support new construction, significant rehabilitation, or modernization activities and then link such developers and contractors with capable, Section 3 eligible workers and small businesses owned by low-income individuals.

Seeking to expand its role in ensuring Section 3 compliance, AH engages in a series of training, employment links, business incubation, and outreach efforts, including the continuing development of a robust MBE/WBE/SBE Section 3 Program. The MBE/WBE/SBE Section 3 Program is AH's effort to stimulate economic opportunities for certified small businesses through direct contracting and subcontracting opportunities. AH will also work closely with its partners and others to ensure that assisted families and other low-income families in Atlanta benefit from job-training activities, and contracting opportunities resulting from these efforts described herein. Such opportunities run the real estate spectrum—from construction activities to professional property services to grounds maintenance and more. No matter the capacity, AH continues to encourage contractors to fulfill the spirit of the Section 3 Program by hiring low-income individuals to work on contracts awarded by AH.

Continued outreach efforts during FY 2021 include attendance at and sponsorship of workshops, seminars, and networking events. AH will use these opportunities to promote AH's MBE/WBE/SBE and Section 3 Programs. AH will measure its success and ability engage under-represented communities in AH's work by—

- Recording the number of persons hired via AH's Section 3 Program
- Recording the number of employment training sessions held and the number of people trained
- Recording the number of Section 3 businesses formed and supported
- Recording the number and value of contract opportunities directly and indirectly attributed to the Section 3 Program

Short-Term Goals and Objectives

- Continue to administer a Small Business Enterprise (**SBE**) Program and Section 3 Program.
- Ensure that policy and procedures are updated in accordance with AH's business model and HUD rules, regulations, and similar guidance tools.
- Monitor AH redevelopment partners, contractors, sub-contractors, and others for compliance with Section 3, Minority-Owned, and Women-Owned Small Businesses (**MBE/WBE**)

Long-Term Goals and Objectives

- Create a learning objective that will facilitate training and employment of program participants meeting Section 3 requirements working in collaboration with Atlanta-based service providers.
- Explore micro-grant opportunities.
- Incubate small businesses startups.
- Seek out and formalize mentor/protégé relationships for small businesses with established businesses.

SECTION III: MTW POLICY INNOVATIONS

A. Innovations Implemented Under AH's MTW Agreement

Under the MTW Agreement, AH strategically implemented most housing policy reforms across all programs, and we continue to administer such activities through FY 2021. This consistency serves multiple purposes: 1) families can expect to rise to the same standards that AH believes lead to self-sufficiency; 2) AH can align its values and goals with contract terms and partner agreements with developers, owners, and service providers; and 3) AH gains economies from systemic implementation across the enterprise and minimizes redundancy, overhead, and system changes. Policy reform examples include the following:

- **AH Operations of HomeFlex.** AH utilizes this activity to project-base assistance at both AH-owned and privately owned communities. AH uses this activity to increase the number of affordable housing choices for low-income families in healthy, mixed-income communities. AH's MTW Agreement provides program flexibility—, therefore, in general terms, AH may issue a Notice of Funding Availability (**NOFA**) that solicits community owners to make a portion of their market units available to program eligible families. In exchange, AH pays a portion of the market rent and property owners increase their occupancy numbers/rate. Another incentive includes AH exploring the mutual benefits of AH maintaining a centralized Waiting List and conducting eligibility screenings for HomeFlex properties. In addition, under this policy, based on AH expanded authorizations, the AH Board of Commissioners establishes project limits at AH-owned properties. Therefore, AH may exceed program cap limits, percent increases, and project cap limits (25% and 50% in the case of RAD) outlined in HUD rules, regulations, and other guidance documents such as the Housing Opportunities through Modernization Act (**HOTMA**) at AH-owned sites, whether owned directly or indirectly, without competition. This policy directly addresses the shortage of property owners accepting rental assistance vouchers.
- **Economic Viability.** Organization-level operational enhancements improve the efficiency of AH's financial business operations. During FY 2021, AH continues to stand up its internal Compliance Monitoring Division and Project Management Office resulting from consultant support in FY 2018. The consultant report assessed compliance, operations, program performance, and financial risks, as well as associated program compliance strategies and practices across AH business units to establish a more formal self-evaluative approach to and in AH operations.

- **Expanding Housing Opportunities.** AH has an intense focus to increase the availability of affordable housing in mixed-income communities seamlessly while utilizing market principles and approaches in administering the subsidy and managing property owner and resident relationships. AH continues to explore the feasibility for project-basing Veteran Affairs Supportive Housing (**VASH**) vouchers to maximize housing opportunities for veterans while alleviating the burden associated with house hunting.
- **HomeFlex Voucher Contracts Targeted to Areas of Opportunity to Increase Rental Supply.** AH's MTW Agreement provides program flexibility, so that, in general terms, AH may issue a NOFA to attract/recruit private developers or property owners in areas of opportunity such as Tax Allocation Districts, to open their property to accept project-based rental assistance. AH issued a caveat in its FY 2020 Plan that permits AH to consider unsolicited proposals under predefined circumstances.
- **Housing Choice Voucher Program.** This traditional HUD program under AH is designed and administered with the goals of supporting families initiatives and facilitating progressive choices of housing opportunities in economically integrated neighborhoods with increased or better quality-of-life amenities.
- **Human Development.** This innovation reflects a collective effort of services, initiatives, and programs that advocate and further support individual and family self-sufficiency, independent living, and aging in place.
- **Local Housing Policy Reforms.** A collective effort of policies, this program promotes resident accountability, responsibility, and stability, whether through self-reliance or supportive services, in the amounts of dollars that low-income households pay for rent and utilities.
- **Property Management Incentives.** This program incorporates efforts designed to ease the administrative and maintenance operations workload and costs of our private owners and property managers. In addition, AH strongly encourages program participants to honor the terms of their lease agreement and cooperate with property owners and managers. AH continues to explore the feasibility of issuing low-interest, long-term loans or other financial vehicles to help property owners or managers meet compliance requirements with the Uniform Physical Accessibility Requirements (**UFAS**).
- **Sub-Market Payment Standards.** This initiative reflects an alternative, acceptable method in lieu of setting payment standards using the metropolitan area wide Fair Market Rent (**FMR**) methodology that aligns with zip codes and the Small Area FMR rule published by HUD on November 16, 2016. AH establishes 23 sub-market payment standards that make low-poverty neighborhoods more accessible and reduce the number of voucher holders that reside in areas with high poverty concentration. This policy gives residents a choice in where they live.

- **Use of Housing Choice Vouchers in Mixed Communities and HomeFlex Communities.** This program involves rental assistance innovation that designates HCV funding to create affordable housing units with private property owners and developers by project basing such rental assistance at these communities. These may include AH ownership, directly or indirectly. In such ownership cases, AH is able to project-base assistance at these projects without competition. With these expanded authorizations, the AH Board of Commissioners establishes project limits at AH-owned properties, and AH may exceed such program cap limits, percent increases, and project cap limits (25% and 50% in the case of RAD) outlined in HUD rules, regulations, and other guidance documents such as the Housing Opportunities through Modernization Act (**HOTMA**). Through this innovative flexibility, AH is able to increase affordable housing choices for program-eligible families and address the shortage of property developers and owners accepting rental assistance.
- **Use of MTW Funds.** AH exercises an inherent MTW funding option that permits AH to combine its HCV Operating Subsidy, Public Housing Operating Subsidy, and Capital Funds Program funding into a single-fund or “MTW Block Grant” to support MTW-Eligible Activities. Such activities include all activities allowed under each program element individually, construction or development of affordable housing units, creation or preservation of affordable housing units, and any other activities as approved by HUD that AH deems appropriate and necessary to implement and administer its rental assistance programs under the MTW Demonstration Program.
- **Work/Program Requirement.** This requirement constitutes a focused effort to incentivize program participants to remain diligent in pursuit of achieving self-sufficiency goals or maintaining supportive services to live independently. The requirement is enterprise wide and is applicable to all non-elderly, non-disabled household members across all rental assistance programs. As a matter of policy, program participants deemed non-compliant with this requirement will have 12 months to achieve compliance before program termination. In cases where HomeFlex participants are terminated, the unit assistance is terminated and the family becomes responsible for the market rent.

A further priority of AH is to position itself to **become a Regional MTW PHA** should such a designation become available in addition to identifying and proposing potential activities that meet identified MTW parameters and reviewing existing HUD-approved activities for alignment to AH’s business model.

AH welcomes you to visit its site at www.atlantahousing.org/news to review its previous MTW Annual Plans and MTW Annual Reports. Proposed MTW policy innovations are included in the MTW Annual Plan for consideration. Proposed policies are effective only after completion of a public comment period, approval by the AH Board of Commissioners, which in doing so, authorizes the president and CEO to execute and provide administrative direction in the administration of those policies through various guidance measures.

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A P P E N D I C E S

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APPENDIX A

ELEMENTS OF AH AGREEMENT – LEGACY ATTACHMENT B

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Appendix A – AH Legacy Attachment B

A-1

During Fiscal Year 2005 (FY 2005), AH engaged Boston Research Group, Inc. to conduct an independent study of AH's MTW Program. Through this independent study, the Boston Group delivered a Baseline Report (FY 2006), an Interim Report (FY 2008), and a Final Report (FY 2010), collectively called the Boston Reports, and introduced inclusionary reporting elements for AH's MTW Annual Plans and MTW Annual Reports. The reporting elements are outlined under AH's Legacy Attachment B of its Amended and Restated MTW Agreement

AH refers to this independent study as both the Boston Report and AH's Benchmarking Study to evaluate the impact of AH's MTW Program on improving neighborhoods and communities and on the quality of life for families served by AH. However, AH is very keen on streamlining operations, eliminating duplicative efforts, and aligning processes and procedures, where possible, to meet the requirements of the Paperwork Reduction Act of 1980 and other environmentally and operationally sound practices enterprise wide.

Therefore, **AH will no longer include its Legacy Attachment B elements in its MTW Annual Plans and MTW Annual Reports.** However, AH will continue to include identified reporting elements in community facing documents, such as its Annual Report.

The table below lists AH's Legacy Attachment B reporting elements and "marries" them to the same or substantially the same elements requested by HUD Form 50900. AH shares the location of the crossed-referenced elements for your reviewing convenience.

Legacy Attachment B Elements Annual Plan	HUD Form 50900 Information Annual Plan	FY 2021 MTW Plan Location
I. Households Served	II.B.i. Planned Number of Households Served	100 – 101
II. Occupancy Policies	Additional items	Located in SCP
III. Changes in Housing Stock	II.A. Housing Stock Information	93 – 99
IV. Sources and Amounts of Funding	V.A. Estimated Sources and Uses of MTW Funds	149
V. Uses of Funds	V.A. Estimated Sources and Uses of MTW Funds	149
VI. Capital Planning	II.A.vi. General Description of All Planned Capital Expenditures	100
VII. Management Information for Owned/Managed Units	II.B.ii. Anticipated Issues/Solutions Related to Leasing	102
VIII. Management Information for Leased Housing	Additional items	Located in SCP
IX. Resident Programs	Additional items	Located in SCP
X. Other Information as Required by HUD	VII. Administrative: Board Resolution, Certifications of Compliance, Documentation of Public Process, PHA-Directed Evaluations, and Lobbying Disclosures	Appendix C

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APPENDIX B

ELEMENTS OF HUD FORM 50900

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(I) INTRODUCTION

AH prepares its Moving-to-Work (MTW) Annual Plan in accordance with the Legacy Attachments approved in its Amended and Restated MTW Agreement, but is in the process of fitting elements of its Legacy Attachments within HUD Form 50900. This element of HUD Form 50900 begins on page vii of this document and ends on page 83.

(II) GENERAL OPERATING INFORMATION

A. HOUSING STOCK INFORMATION

i. Planned New Public Housing Units

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

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

Total Public Housing Units to be Added in the Plan Year

0

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

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

N/A

ii. **Planned Public Housing Units to be Removed**

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

AMP NAME AND NUMBER	NUMBER OF UNITS TO BE REMOVED	EXPLANATION FOR REMOVAL
Hightower Manor/ GA 006000530	129	Portfolio conversion for recapitalization and affordable unit preservation purposes
Barge Road/ GA 006000540	129	Portfolio conversion for recapitalization and affordable unit preservation purposes
Villages @ Castleberry Hills II/ GA 006000800	114	Portfolio conversion for recapitalization and affordable unit preservation purposes
Columbia Village/ GA 006000810	30	Portfolio conversion for recapitalization and affordable unit preservation purposes

402

Total Public Housing Units to be Removed in the Plan Year

iii. **Planned New Project Based Vouchers**

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

PROPERTY NAME	NUMBER OF VOUCHERS TO BE PROJECT-BASED	RAD?	DESCRIPTION OF PROJECT
Hightower Manor/ GA 006000530	129	Yes	Near-Elderly, Elderly, Non-Elderly Disabled property.
Barge Road/ GA 006000540	129	Yes	Near-Elderly, Elderly, Non-Elderly Disabled property.
Villages @ Castleberry Hills II/ GA 006000800	114	Yes	Mixed-Income Family property
Columbia Village/ GA 006000810	30	Yes	Mixed-Income Family property

402

Planned Total Vouchers to be Newly Project-Based

iv. Planned Existing Project Based Vouchers

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

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	PLANNED STATUS AT END OF PLAN YEAR*	RAD?	DESCRIPTION OF PROJECT
Adamsville Green	81	Leased/Issued	No	Creation of PBV units through HAVEN HomeFlex Program
Arcadia at Parkway Village	116	Leased/Issued	No	Creation of PBV units through AH's HomeFlex Program
Ashley Auburn Pointe I	8	Leased/Issued	No	Creation of PBV units through AH's HomeFlex Program
Ashton at Browns Mill	79	Leased/Issued	No	Creation of PBV units through HAVEN HomeFlex Program
Atrium at CollegeTown	114	Leased/Issued	No	Creation of PBV units through AH's HomeFlex Program
Auburn Glenn	108	Leased/Issued	No	Creation of PBV units through AH's HomeFlex Program
Avalon Park Family	53	Leased/Issued	No	Creation of PBV units through AH's HomeFlex Program
Avalon Park Senior	136	Leased/Issued	No	Creation of PBV units through AH's HomeFlex Program
Avalon Ridge Family	89	Leased/Issued	No	Creation of PBV units through AH's HomeFlex Program
Campbell Stone	201	Leased/Issued	No	Creation of PBV units through AH's HomeFlex Program
Capitol Gateway II	16	Leased/Issued	No	Creation of PBV units through AH's HomeFlex Program
Centennial Place I	74	Leased/Issued	No	Creation of PBV units through AH's HomeFlex Program
Centennial Place II	70	Leased/Issued	No	Creation of PBV units through AH's HomeFlex Program
Centennial Place III	74	Leased/Issued	No	Creation of PBV units through AH's HomeFlex Program

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	PLANNED STATUS AT END OF PLAN YEAR*	RAD?	DESCRIPTION OF PROJECT
Centennial Place IV	83	Leased/Issued	No	Creation of PBV units through AH's HomeFlex Program
Columbia at Sylvan Hills	76	Leased/Issued	No	Creation of PBV units through HAVEN HomeFlex Program
Columbia Colony Senior	62	Leased/Issued	No	Creation of PBV units through AH's HomeFlex Program
Columbia Commons	15	Leased/Issued	No	Creation of PBV units through AH's HomeFlex Program
Columbia Heritage	124	Leased/Issued	No	Creation of PBV units through AH's HomeFlex Program
Columbia High Point (Senior)	94	Leased/Issued	No	Creation of PBV units through AH's HomeFlex Program
Columbia Mechanicsville Apartments	35	Leased/Issued	No	Creation of PBV units through AH's HomeFlex Program
Columbia Senior Residences at Blackshear	77	Leased/Issued	No	Creation of PBV units through AH's HomeFlex Program
Columbia Senior Residences at Edgewood	135	Leased/Issued	No	Creation of PBV units through AH's HomeFlex Program
Columbia Senior Residences at Mechanicsville	81	Leased/Issued	No	Creation of PBV units through AH's HomeFlex Program
Columbia Senior Residences at MLK, Jr.	121	Leased/Issued	No	Creation of PBV units through AH's HomeFlex Program
Columbia South River Gardens	51	Leased/Issued	No	Creation of PBV units through AH's HomeFlex Program
Columbia Tower at MLK Village	95	Leased/Issued	No	Creation of PBV units through HAVEN HomeFlex Program
Constitution Avenue Apartments	67	Leased/Issued	No	Creation of PBV units through AH's HomeFlex Program
Crogman School Apartments	45	Leased/Issued	No	Creation of PBV units through AH's HomeFlex Program
Donnelly Courts	52	Leased/Issued	No	Creation of PBV units through AH's HomeFlex Program

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	PLANNED STATUS AT END OF PLAN YEAR*	RAD?	DESCRIPTION OF PROJECT
Gateway at East Point	100	Leased/Issued	No	Creation of PBV units through AH's HomeFlex Program
GE Tower	190	Leased/Issued	No	Creation of PBV units through AH's HomeFlex Program
Heritage Green	44	Leased/Issued	No	Creation of PBV units through AH's HomeFlex Program
Heritage Station I	88	Leased/Issued	No	Creation of PBV units through AH's HomeFlex Program
Heritage Station II	150	Leased/Issued	No	Creation of PBV units through AH's HomeFlex Program
Imperial Hotel	90	Leased/Issued	No	Creation of PBV units through HAVEN HomeFlex Program
Lakewood at Christian Manor	192	Leased/Issued	No	Creation of PBV units through AH's HomeFlex Program
Lillie R. Campbell House	56	Leased/Issued	No	Creation of PBV units through AH's HomeFlex Program
Manor at Scott's Crossing	100	Leased/Issued	No	Creation of PBV units through AH's HomeFlex Program
Martin House at Adamsville	106	Leased/Issued	No	Creation of PBV units through AH's HomeFlex Program
Mechanicsville Crossing	30	Leased/Issued	No	Creation of PBV units through AH's HomeFlex Program
Mechanicsville Station	35	Leased/Issued	No	Creation of PBV units through AH's HomeFlex Program
Oasis at Scholars Landing	48	Leased/Issued	No	Creation of PBV units through AH's HomeFlex Program
Odyssey at Villas	32	Leased/Issued	No	Creation of PBV units through HAVEN HomeFlex Program
O'Hern House	76	Leased/Issued	No	Creation of PBV units through HAVEN HomeFlex Program

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	PLANNED STATUS AT END OF PLAN YEAR*	RAD?	DESCRIPTION OF PROJECT
Park Commons/ Gates Park (HFOP)	152	Leased/Issued	No	Creation of PBV units through HAVEN HomeFlex Program
Park Commons/Gates Park (HFS)	129	Leased/Issued	No	Creation of PBV units through HAVEN HomeFlex Program
Parkside at Mechanicsville	32	Leased/Issued	No	Creation of PBV units through AH's HomeFlex Program
Peaks at MLK, Jr.	73	Leased/Issued	No	Creation of PBV units through AH's HomeFlex Program
Phoenix House	44	Leased/Issued	No	Creation of PBV units through HAVEN HomeFlex Program
Piedmont Road High-rise	208	Leased/Issued	Yes	Conversion of Senior PH units to PBV units under RAD
Providence at Parkway Village	50	Leased/Issued	No	Creation of PBV units through AH's HomeFlex Program
Quest Villages III	10	Leased/Issued	No	Creation of PBV units through HAVEN HomeFlex Program
Retreat at Edgewood	40	Leased/Issued	No	Creation of PBV units through AH's HomeFlex Program
Reynoldstown Senior Residences	26	Leased/Issued	No	Creation of PBV units through AH's HomeFlex Program
Seven Courts	30	Leased/Issued	No	Creation of PBV units through HAVEN HomeFlex Program
Summit Trail	40	Leased/Issued	No	Creation of PBV units through HAVEN HomeFlex Program
Tenth and Juniper High-rise	149	Leased/Issued	Yes	Conversion of Senior PH units to PBV units under RAD
The Legacy at Walton Lakes	24	Leased/Issued	No	Creation of PBV units through AH's HomeFlex Program
The Remington Apartments	160	Leased/Issued	No	Creation of PBV units through AH's HomeFlex Program
The Renaissance at Park South Senior	100	Leased/Issued	No	Creation of PBV units through AH's HomeFlex Program

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	PLANNED STATUS AT END OF PLAN YEAR*	RAD?	DESCRIPTION OF PROJECT
Veranda at Auburn Pointe	86	Leased/Issued	No	Creation of PBV units through AH's HomeFlex Program
Veranda at Auburn Pointe II	98	Leased/Issued	No	Creation of PBV units through AH's HomeFlex Program
Veranda at Auburn Pointe III	102	Leased/Issued	No	Creation of PBV units through AH's HomeFlex Program
Veranda at Carver	90	Leased/Issued	No	Creation of PBV units through AH's HomeFlex Program
Veranda at CollegeTown	100	Leased/Issued	No	Creation of PBV units through AH's HomeFlex Program
Veranda at Groveway	74	Leased/Issued	No	Creation of PBV units through AH's HomeFlex Program
Veranda at Scholars Landing	100	Leased/Issued	No	Creation of PBV units through AH's HomeFlex Program
Villages at Castleberry Hill I	66	Leased/Issued	Yes	Conversion of Family PH units to PBV units under RAD
Villas of H.O.P.E.	36	Leased/Issued	No	Creation of PBV units through HAVEN HomeFlex Program
Welcome House	41	Leased/Issued	No	Creation of PBV units through HAVEN HomeFlex Program
Woodbridge at Parkway Village	98	Leased/Issued	No	Creation of PBV units through AH's HomeFlex Program

5,927

Planned Total Existing Project-Based Vouchers

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

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

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

PLANNED OTHER CHANGES TO MTW HOUSING STOCK ANTICIPATED IN THE PLAN YEAR

As a strategic technique, AH plans to hold units off-line to house program participants affected by AH's significant rehabilitation and modernization efforts associated with its plans to increase the number of rental units in its portfolio because of construction or project conversion under the RAD Program.

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

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

GENERAL DESCRIPTION OF ALL PLANNED CAPITAL EXPENDITURES DURING THE PLAN YEAR	
Four priorities guide AH's capital expenditures, which are— 1) Health and Safety of Residents, 2) Property Viability, 3) Compliance, and 4) Redevelopment through the Rental Assistance Demonstration (RAD) Program. Guided by these priorities, AH expects \$1,175,000 in capital expenditures in FY 2021 for the following projects: 1 dumpster upgrade and relocation, 4 elevator motor upgrades, 4 elevator repairs that includes rope and sheave replacement, 4 elevator upgrades that includes door operators and drive replacement, 5 site improvement projects, and 1 foundation repair at the following AH-Owned communities:	
• Barge Road Highrise	\$25,000
• Cheshire Bridge Road Highrise	\$250,000
• Cosby Spears Highrise	\$25,000
• East Lake Highrise	\$25,000
• Georgia Avenue Highrise	\$136,000
• Hightower Manor Highrise	\$25,000
• Marian Road Highrise	\$371,000
• Martin Street Plaza	\$232,000
• <u>Westminister</u>	<u>\$86,000</u>
AH Capital Expenditures.....	\$1,175,000

B. LEASING INFORMATION

i. **Planned Number of Households Served**

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

PLANNED NUMBER OF HOUSEHOLDS SERVED THROUGH:	PLANNED NUMBER OF UNIT MONTHS OCCUPIED/LEASED*	PLANNED NUMBER OF HOUSEHOLDS TO BE SERVED**
MTW Public Housing Units Leased	26,076	2,173
MTW Housing Choice Vouchers (HCV) Utilized	231,912	19,326
Local, Non-Traditional: Tenant-Based^	3,000	250
Local, Non-Traditional: Property-Based^	32,040	2,670
Local, Non-Traditional: Homeownership^	16,776	1,398
Planned Total Households Served	309,804	25,817

* "Planned Number of Unit Months Occupied/Leased" is the total number of months the MTW PHA plans to have leased/occupied in each category throughout the full Plan Year.

** "Planned Number of Households to be Served" is calculated by dividing the "Planned Number of Unit Months Occupied/Leased" by the number of months in the Plan Year.

^ In instances when a local, non-traditional program provides a certain subsidy level but does not specify a number of units/households to be served, the MTW PHA should estimate the number of households to be served.

LOCAL, NON-TRADITIONAL CATEGORY	MTW ACTIVITY NAME/NUMBER	PLANNED NUMBER OF UNIT MONTHS OCCUPIED/LEASED*	PLANNED NUMBER OF HOUSEHOLDS TO BE SERVED*
Tenant-Based	Developing Alternative and Supportive Housing Resources/ SH.2005.09	3,000	250
Property-Based	Reformulating the Subsidy Arrangement in . . .AH's Affordable Communities/ RE.2005.09	13,020	1,085
Property-Based	HomeFlex Site-Based Administration/ RE.2006.02	19,020	1,585
Homeownership	Comprehensive Homeownership Program/ RE.2007.03	16,776	1,398

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

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

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

HOUSING PROGRAM	DESCRIPTION OF ANTICIPATED LEASING ISSUES AND POSSIBLE SOLUTIONS
MTW Public Housing	AH does not anticipate any leasing issues during FY 2021; however, AH may institute a moratorium on leasing activities to ensure housing solutions for existing residents affected by AH's unit conversion activities under the RAD Program. AH expects that leasing issues because of any moratorium will resolve organically once RAD activities are complete and the moratorium lifted.
MTW Housing Choice Voucher	Because of the high occupancy rate (~95%) and increasing rental amounts in its service jurisdiction, AH anticipates leasing issues to continue for program participants searching for 1 or 2 bedroom units. Possible solutions are part of AH's long-term goals and objectives that include constructing affordable units. In the meantime, AH actively markets its leasing incentive fees (LIFs) to recruit and retain property owners to accept tenant-based vouchers at their property(s). Once construction is complete, AH expects that leasing issues will resolve organically.
Local, Non-Traditional	Because of the high occupancy rate (~95%) and increasing rental amounts in its service jurisdiction, AH anticipates leasing issues to continue for program participants searching for 1 or 2 bedroom units and needing supportive services and time to stabilize their personal situation. Possible solutions are part of AH's long-term goals and objectives that include constructing affordable units. In the meantime, AH actively markets its HomeFlex Program to recruit and retain property owners to accept a monthly subsidy or project-based vouchers at their property(s). Once construction is complete, AH expects that leasing issues will resolve organically.

C. **WAITING LIST INFORMATION**

i. **Waiting List Information Anticipated**

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

WAITING LIST NAME	DESCRIPTION	NUMBER OF HOUSEHOLDS ON WAITING LIST	WAITING LIST OPEN, PARTIALLY OPEN OR CLOSED	PLANS TO OPEN THE WAITING LIST DURING THE PLAN YEAR
MTW Public Housing (by contract mgmt)	Community-wide	N/A	Open	Yes
MTW Housing Choice Voucher (HCV)	Community-wide	23,787	Closed	No
RAD Project-Based Voucher (PBV)	Program Specific	3	Partially Open	Yes

Please describe any duplication of applicants across waiting lists:

AH permits prospective residents to occupy multiple waiting lists

ii. Planned Changes to Waiting List in the Plan Year

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

WAITING LIST NAME	DESCRIPTION OF PLANNED CHANGES TO WAITING LIST
MTW Public Housing	N/A
MTW Housing Choice Voucher	N/A
RAD Project-Base Voucher	N/A

(III) PROPOSED MTW ACTIVITIES: HUD Approval Requested

The MTW Activities listed below already have HUD-approval and re-proposed by AH to ensure clarity in the original intent of the activity, to expand the intent of the activity, or to combine like activities. All of these actions permit AH to reduce duplication and simplify MTW Activities and improve measurements of activity performance.

AW.2005.02 – EARNED INCOME DISREGARD (REPROPOSED)

A. Activity Description

i. Describe the Proposed Activity.

This activity is a re-proposal activity by Atlanta Housing (AH) that **combines like activities**. Through an internal review of AH's MTW Activities, AH discovered identical intent between **AW.2005.02 – Elderly Income Disregard** and **AW.2011.01 – Non-Elderly Disabled Income Disregard** that exclude earned income from the rent calculation generated by these population groups.

These MTW Activities were introduced in AH's FY 2005 and FY 2011 MTW Annual Plans respectively and the primary intent of these activities, to encourage employment among the population groups, remains the intact. **AH continues to disregard earned income of seniors and non-elderly, disabled households whose source(s) of income are fixed**, stable sources and received from a verifiable plan. Such income sources typically include Social Security, Social Security Insurance (SSI), employment pension, Veterans Affairs Benefits, and other income sources that are generally fixed, stable sources.

Combining like activities with the same goal is efficient; however, AH continues to establish, at its discretion, a limit on the amount of disregarded earned income. Earned income not disregarded is included in the annual household income calculation. Finally, households meeting the definition of elderly or non-elderly, disabled, but not the fixed income sources definition continue to have all income sources included in the rent calculation.

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

Through continued administration of this activity, this activity continues primarily to achieve **MTW Statutory Objectives: Give Incentives**. Combining these activities is also a cost efficiency, where AH is eliminating duplicative efforts under the same intended flexibility.

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

AH implemented activity already and does not expect any schedule changes because of the combining of like activities.

B. Activity Metrics Information

i. HUD Standard Metrics applicable to the proposed activity

The following HUD Standard Metrics are applicable to this activity:

- SS #1: Increase in Household Income
- SS #5: Households Assisted by Services that Increase Self-Sufficiency
- SS #8: Households Transitioned to Self-Sufficiency

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

This information is captured in AH's MTW Annual Report.

iii. Give annual benchmark for each metric

This information is captured in AH's MTW Annual Report.

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

N/A

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

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

C. Cost Implications

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

AH **does not anticipate** the proposed activity resulting in **any cost implication** for AH.

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

N/A.

D. Need/Justification for MTW Flexibility

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

AH utilizes MTW Authorization under **Attachment D Section I.G and Section I.O** of its Amended and Restated MTW Agreement to adopt and implement reasonable policies for setting rents or subsidy levels for public housing, project-based, or tenant-based assistance.

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

AH needs to exercise these MTW Authorizations to modify HUD Regulation 24 CFR §5.609 Annual Income, 24 CFR §5.611 Adjusted Income, and 24 CFR §5.628 Total Tenant Payment to affect the rent calculation formula by excluding earned income from the formula for households meeting outlined conditions.

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

i. Impact Analysis

(1) A description of how the proposed MTW activity will impact household rent/tenant share
Because **AH is simply combining existing, HUD-approved activities, AH does not anticipate any changes because of this action.** Nonetheless, AH expects that this activity will continue in the same manner since its implementation, which includes a static impact on household rent/tenant share and an increase in disposable household income that families can use to offset expenses associated with such a population group.

(2) A description of how the MTW PHA will implement and track the rent reform activity
Since this is an **existing activity, already approved by HUD, implementation is active.** AH expects to continue tracking the activity in the same manner with updated software.

(3) Numerical analysis detailing the intended/possible impacts of the rent reform activity
Not available since this is an **existing activity, already approved by HUD** and implementation is active.

(4) A plan for how the MTW PHA will weigh the consequences/benefits of the rent reform activity to determine adjustments/terminations/reductions/expansions/continuations in the performance of the activity.

AH will continue to monitor household income totals and the effects of earned income on fixed income amounts. AH is concerned that earned income may decrease fixed income amounts to a point that a participant's rent no longer represents their fair share,

which increases AH's share (the subsidy level) and reduces opportunities for AH to assist others.

ii. Hardship case criteria

AH will consider written hardship requests in accordance with its hardship policies.

iii. Descriptions of annual reevaluations

AH conducts triennial eligibility certifications for seniors and non-elderly, disabled households with fixed income. If AH disregards earned income, then such households will remain on the triennial certification cycle. For households whose earned income is not 100% disregarded, those households will return to an annual certification cycle, until such time that they meet triennial certification requirements.

iv. Transition period

N/A since this activity is implemented and simply combining identical activities for separate population groups into one activity.

(IV) APPROVED MTW ACTIVITIES: HUD Approval Previously Granted

A. IMPLEMENTED ACTIVITIES

Activity ID		Activity Name	Attachment D Authorization	Housing Program
AW	2005.01	\$125 Minimum Rent	Section I O: General Conditions	HCV; PH
AW	2005.02	Elderly Income Disregard	Section I O: General Conditions	HCV; PH
AW	2005.03	Work / Program Requirement	Section I O: General Conditions Section IV: Self-Sufficiency / Supportive Services	HCV; PH
HC	2005.04	Enhanced Inspection Standards	Section VII: Establishment of HCV Program	HCV
HD	2005.05	Good Neighbor Program II	Section IV: Self-Sufficiency / Supportive Services Section V: Single Fund Budget with Full Flexibility	HCV
HD	2005.06	Human Development Services	Section IV: Self-Sufficiency / Supportive Services Section V: Single Fund Budget with Full Flexibility	HCV; PH
PH	2005.07	4 to 1 Elderly Admissions	Section III: Occupancy Policies Section IV: Self-Sufficiency / Supportive Services	PH only
SH	2005.08	Independent Living Demonstration (<i>formerly Affordable Assisted Living Demonstration</i>)	Section V: Single Fund Budget with Full Flexibility Section VII.B: Simplification of the Process to Project-Base Section 8 Vouchers Section VII.C: Simplification of the Development and Redevelopment Process	HCV only
RE	2005.09	Reformulating the Subsidy Arrangement in AH-Sponsored Mixed-Use Communities, including Centennial Place and AH's Affordable Communities	Section V: Single Fund Budget with Full Flexibility Section VII.C: Simplification of the Development and Redevelopment Process	HCV only

Implemented Activities				
Activity ID		Activity Name	Attachment D Authorization	Housing Program
SH	2005.09	Developing Alternate and Supportive Housing Resources	Section V: Single Fund Budget with Full Flexibility Section VII.B: Simplification of the Process to Project-Base Section 8 Vouchers Section VII.C: Simplification of the Development and Redevelopment Process	HCV only
RE	2005.10	Revitalization Program	Section V: Single Fund Budget with Full Flexibility Section VII.B: Simplification of the Process to Project-Base Section 8 Vouchers Section VII.C: Simplification of the Development and Redevelopment Process	HCV; PH
RE	2005.11	Gap Financing	Second Amendment, Section 2: Use of MTW Funds Second Amendment Section 3: Reinstatement of "Use of MTW Funds" Implementation Protocol	HCV; PH
HC	2006.01	AH Submarket Payment Standards	Section VII: Establishment of HCV Program	HCV only
RE	2006.02	HomeFlex (<i>formerly Project-Based Rental Assistance</i>) Site-Based Administration	Section V: Single Fund Budget with Full Flexibility Section VII.B: Simplification of the Process to Project-Base Section 8 Vouchers Section VII.C: Simplification of the Development and Redevelopment Process	HCV only

Implemented Activities				
Activity ID		Activity Name	Attachment D Authorization	Housing Program
HC	2007.01	Re-engineering the Housing Choice Voucher (HCV) Program	Section V: Single Fund Budget with Full Flexibility Section VII: Establishment of HCV Program Section VII.B: Simplification of the Process to Project-Base Section 8 Vouchers Section VII.C: Simplification of the Development and Redevelopment Process	HCV only
HC	2007.02	Rent Reasonableness	Section VII: Establishment of HCV Program	HCV; PH
RE	2007.03	Comprehensive Homeownership Program	Section V: Single Fund Budget with Full Flexibility	HCV; PH
RE	2007.04	HomeFlex (<i>formerly Project-Based Rental Assistance</i>) as a Strategic Tool	Section V: Single Fund Budget with Full Flexibility Section VII.B: Simplification of the Process to Project-Base Section 8 Vouchers Section VII.C: Simplification of the Development and Redevelopment Process	HCV only
AW	2008.01	Rent Simplification / AH Standard Deductions	Section I.O: General Conditions	HCV; PH
HC	2008.02	Leasing Incentive Fee (LIF)	Section VII: Establishment of HCV Program	HCV only
PH	2008.03	Energy Performance Contracting (EPC)	Section IX: Energy Performance Contracting	PH only
AW	2011.01	Non-Elderly Disabled Income Disregard	Section I.O: General Conditions	HCV: PH
HC	2011.02	HCV Program Housing Assistance Payment (HAP) Abatement Policy	Section VII: Establishment of HCV Program	HCV only

Implemented Activities				
Activity ID		Activity Name	Attachment D Authorization	Housing Program
PH	2011.03	Aging Well Program	Section IV: Self-Sufficiency / Supportive Services Section V: Single Fund Budget with Full Flexibility	HCV; PH
RE	2012.01	Single Family Home Rental Demonstration	Section V: Single Fund Budget with Full Flexibility	HCV; PH
SH	2013.01	Veterans Supportive Housing	Section IV: Self-Sufficiency / Supportive Services Section V: Single Fund Budget with Full Flexibility	HCV only
PH	2017.01	Elimination of Flat Rent	Section I.O: General Conditions Section IV: Self-Sufficiency / Supportive Services Section V: Single Fund Budget with Full Flexibility	HCV; PH

AW.2005.01 – \$125 MINIMUM RENT

i. Plan Year Approved, Implemented, Amended

Activity approved and implemented in FY 2005.

ii. Description/Update

In response to budget constraints and identifying opportunities for program participants to contribute toward sustaining subsidized housing assistance and paying their “fair share”, AH utilizes MTW Authorizations under Attachment D, Section I.O of its Amended and Restated Agreement to increase the minimum rent from \$25 per month to \$125 per month. The rent increase is effective October 1, 2004 (FY 2005) and applicable to all rental assistance programs.

Households meeting the exclusionary definitions are exempt from the application of the minimum rent and continue to pay income-based rent or 30% of their adjusted gross income. AH defines an exempt household as all members of the household meet the definition of elderly or disabled and have a fixed, stable income source, such as Social Security, Social Security Insurance (SSI), employment pension, Veterans Affairs Benefits, and similar, fixed income sources.

AH’s housing policies extend to all properties under AH’s portfolio, including sites that are managed by professional property management agents that includes public housing, mixed-finance, mixed-income, and HomeFlex rental communities achieved through public-private partnerships. Management agents are responsible for implementing AH housing policies and AH conducts site visits, consults with management representatives, and reviews reports periodically with respect to management, maintenance, financial oversight and occupancy performances.

iii. Planned Non-Significant Changes

AH does not have any non-significant changes planned for this activity.

iv. Planned Changes to Metrics/Data Collection

AH may add other HUD Standard Metrics to better assess the performance of this activity. Additional HUD Standard Metrics, if any, will appear in AH's MTW Annual Report. HUD Standard Metrics under consideration include:

- SS #1: Increase in Household Income
- SS #6: Reducing Per Subsidy Costs for Participating Households
- SS #7: Increase in Agency Rental Revenue
- SS #8: Households Transitioned to Self-Sufficiency

AH does not plan any changes to its data collection tools nor data collection methodology.

v. Planned Significant Changes

AH does not have any significant changes planned for this activity; however, AH may consider increasing the minimum rent over a 5-year period. Should AH elect to change this activity, AH will provide more detail in forthcoming MTW Annual Reports and MTW Annual Plans.

AW.2005.02 – ELDERLY INCOME DISREGARD (REPROPOSED)

AH re-proposes this activity and directs the reader to **page 104** of this document for details.

AW.2005.03 – WORK/PROGRAM REQUIREMENT

i. Plan Year Approved, Implemented, Amended

Activity approved and implemented in FY 2005.

ii. Description/Update

Pursuant to AH's MTW Agreement, HUD acknowledges that AH believes that MTW Best Practices which relate to policy, operational, and administrative matters are critical to the ongoing feasibility, sustainability, and success of various arrangements. One such arrangement is AH's beliefs, supported by studies, that the primary paths to self-sufficiency are work and education.

Under this premise, AH designed a work/program requirement by utilizing MTW Authorizations under Attachment D, Section I.H and Section IV: Self-Sufficiency/Supportive Services of its Amended and Restated MTW Agreement.

Originally, as an ongoing condition to receive and maintain rental assistance, all work-abled Head of Household (**HoH**) participants (18 – 61) and other adult household members are required to maintain continuous fulltime employment defined as 30-hours per week. Further, fulltime school enrollment is required for all minor dependents and where minor youth are not attending school fulltime, dropped out, AH requires employment of these individuals as a condition for the HoH to receive and maintain rental assistance. Elderly (62+) and non-elderly, disabled individuals are exempt from the employment and education requirement. Non-elderly, disabled participants are subject to verifiably unable to work because of the disability. Rent relief for participants is applicable for employment terminations beyond the participant's control; otherwise, participants that become unemployed have 60-days to regain employment, unless an exemption applies. AH identifies and refers non-compliant households to community resources that link employment, training, and other services to help program participants become and remain compliant.

Since implementation, AH has updated this MTW Activity to capture scheduling practices of industry employers in which a great many of our participants are employed. Therefore, AH moved from 30 hours per week to an average of 20 hours per week. No other parts of the MTW Activity changed, so the policy requires that (a) at least one non-disabled adult household member maintain continuous employment of at least 20 hours per week and (b) all other non-elderly, non-disabled adults maintain work or participation in a combination of school, job training, or part-time employment for the same amount of time. Households must continue to meet the work/program requirement as a condition to receive and maintain subsidy assistance.

Once identified as non-compliant, non-compliant household members have 90-days to comply with the work/program requirement. If the household is non-compliant on day 91, non-compliant household members are referred to AH's Human Development Services (**HDS**) team (since FY 2014) to assist them in becoming compliant with the 20-hour requirement within 12 months. HDS maintains a Service Provider Network of more than 126 organizations that address a broad spectrum of support services. If reasons for unemployment fall under other issues, AH staff conducts resource briefings and workshops and provides 12 months of service coordination that includes progress monitoring and guidance.

Management agents at AH owned sites and of AH-assisted units are directed to refer non-compliant HomeFlex household members to area service providers that will assist household members on a first come, first serve basis. Non-compliant households also have 12 months to achieve compliance and those failing to meet AH's work/program requirement after 12 months may lose their housing assistance, which would require the family to move out or pay market rent.

iii. Planned Non-Significant Changes

AH does not have any non-significant changes planned for this activity.

iv. Planned Changes to Metrics/Data Collection

AH may add other HUD Standard Metrics to better assess the performance of this activity. Additional HUD Standard Metrics, if any, will appear in AH's MTW Annual Report. HUD Standard Metrics under consideration include:

- SS #1: Increase in Household Income
- SS #3: Increase in Positive Outcomes of Employment Status
- SS #5: Households Assisted by Services that Increase Self-Sufficiency
- SS #8: Households Transitioned to Self-Sufficiency

AH does not plan to any changes to its data collection tools nor data collection methodology.

v. Planned Significant Changes

AH does not have any significant changes planned for this activity.

HC.2005.04 – ENHANCED INSPECTION STANDARDS

i. Plan Year Approved, Implemented, Amended

Activity approved and implemented in FY 2005.

ii. Description/Update

In an effort to instill higher health and safety standards, AH utilized MTW Authorizations under AH's Attachment D, Section VII: Establishment of Housing Choice Voucher Program to implement more aggressive enforcement of higher standards for both residents and program participants to receive and maintain rental assistance.

Because AH's service jurisdiction has become from tight and very competitive, AH reviews inspection processes and procedures regularly to improve the delivery of quality affordable housing to residents and program participants. A portion of this effort focuses on considering updated materials and building codes and another portion of the effort focuses on aligning standards and timelines to mirror industry best practices and, as appropriate, private rental market practices in order to reduce administrative burdens. Further, these enhanced inspection standards complement a tight real estate market while enhancing property eligibility criteria for single family, 2 - 4 unit multifamily, and commercial units.

Enhanced inspection standards include eliminating the requirement for property owners to provide gas certifications at the initial inspection. Gas certifications are required at the inspector's discretion, usually when a gas reliant appliance is not accessible. Another enhancement includes pre-contract assessments, initial inspections for property inclusion into the HCV Program, annual property and unit inspections, special inspections related to health and safety issues as initiated by program participants, property owners, or neighbors, and Quality Control inspections, which are a random sampling of previous pass/fail inspections. The most recent enhancement under this activity includes revision to the Site and Vicinity standards from a 6-door radius (front-back-left-right) to a 1-door radius. This standard clearly defines unit eligibility for property owners.

iii. Planned Non-Significant Changes

AH does not have any non-significant changes planned for this activity.

iv. Planned Changes to Metrics/Data Collection

AH may add other HUD Standard Metrics to better assess the performance of this activity. Additional HUD Standard Metrics, if any, will appear in AH's MTW Annual Report. HUD Standard Metrics under consideration include:

- CE #1: Agency Cost Savings
- CE #2: Staff Time Savings
- HC #1: Additional Units of Housing Made Available

AH does not plan any changes to its data collection tools nor data collection methodology.

v. Planned Significant Changes

AH does not have any significant changes planned for this activity.

HC.2005.05 – GOOD NEIGHBOR PROGRAM II

i. Plan Year Approved, Implemented, Amended

Activity approved and implemented in FY 2005.

ii. Description/Update

In response to its plans to create-income properties and in an effort to prepare families to succeed in planned low-poverty neighborhoods, AH utilizes MTW Authorizations under AH's Attachment D, Section IV: Self-Sufficiency/Support Services and Section V.A: Single Fund Budget with Full Flexibility of its Amended and Restated MTW Agreement to establish a referral-based program to educate participants. Program topics include living outside of public housing in market rate, mixed-income communities, renting from private property owners, and living in single-family houses.

Since implementation of the Good Neighbor Program (**GNP**), GNP has grown into an instructional program taught by an academic or community entity secured through competitive solicitation. Under this program, curriculum includes training on the roles and responsibilities of being a good

neighbor after relocating to amenity-rich neighborhoods. In addition, three “real life” issues: (1) conflict resolution and problem solving, (2) community expectations and, (3) valuing life-long education prompted GNP’s coursework to expand and include a certification requirement for participants.

Collectively, the training program components include tenant/landlord relationships, self-reliance and personal responsibility, civic responsibilities and engagement, being a good neighbor, AH’s Housing Choice Family Obligations, and serves as training program for youth and as a point of interest, neighbors, property owners/managers, and others can refer AH residents and clients to GNP. Referred families must complete this program for continued assistance and families that exceed the multiple-referral threshold may lose their rental assistance.

iii. Planned Non-Significant Changes

AH does not have any non-significant changes planned for this activity.

iv. Planned Changes to Metrics/Data Collection

AH may add other HUD Standard Metrics to better assess the performance of this activity. Additional HUD Standard Metrics, if any, will appear in AH’s MTW Annual Report. HUD Standard Metrics under consideration include:

- SS #5: Households Assisted by Services that Increase Self-Sufficiency
- SS #8: Households Transitioned to Self-Sufficiency

AH does not plan any changes to the Metrics nor the data collection tools or methodology.

v. Planned Significant Changes

AH does not have any significant changes planned for this activity.

HD.2005.06 – HUMAN DEVELOPMENT SERVICES (HDS)

i. Plan Year Approved, Implemented, Amended

Activity approved and implemented in FY 2005.

ii. Description/Update

In an effort to leverage agency resources and maximize outcomes among program participants, AH utilizes MTW Authorizations under Attachment D, Section IV: Self-Sufficiency/Support Services and Section V.A: Single Fund Budget with Full Flexibility of its Amended and Restated MTW Agreement to **link self-sufficiency and supportive services programming to its program participants.**

AH continually searches for community resources that provides employment, training, and social services and has expanded its service provider network to more than 125 organizations and agencies that address a broad spectrum of services, including service that address the needs of senior, disabled, and young household members. To ensure that resources are not wasted, AH requires full participation of program participants referred to Human Development Services (HDS). In FY 2014, AH expanded utilization of the HDS staff to include two Family Self-Sufficiency (FSS) Program Coordinators (grant funded) to assess the specific needs of the whole family in support of working-aged adults transitioning to the workforce for the first time or after an extended period (6 months or longer) of unemployment.

AH's human development approach is developed from experience and emphasizes particular attention on the following population segments:

1. **Working-aged Adults** – this population group is a primary focus of HDS' efforts in assisting households to become and remain compliant with AH's Work/Program Requirement. Under this activity, HDS provides light case management services and connects household members to specialized supportive service providers under contract with AH;
2. **Elderly and Disabled Adults** – the primary focus for HDS in this group is providing supportive services that encourages aging in place and independent living; and,
3. **Children (0–5) and Youth (6–17)** – the focal points for this population group is advancing educational successes through a variety of mediums and opportunities.

iii. Planned Non-Significant Changes

AH does not have any non-significant changes planned for this activity.

iv. Planned Changes to Metrics/Data Collection

AH may add other HUD Standard Metrics to better assess the performance of this activity. Additional HUD Standard Metrics, if any, will appear in AH's MTW Annual Report. HUD Standard Metrics under consideration include:

- SS #5: Households Assisted by Services that Increase Self-Sufficiency
- SS #8: Households Transitioned to Self-Sufficiency

AH does not plan any changes to the Metrics nor the data collection tools or methodology.

v. Planned Significant Changes

AH does not have any significant changes planned for this activity.

PH.2005.07 – 4 TO 1 ELDERLY ADMISSION

i. Plan Year Approved, Implemented, Amended

Activity approved and implemented in FY 2005.

ii. Description/Update

In response to the complex social issues associated with mixing seniors and young, disabled residents in AH-owned communities, AH utilizes MTW Authorization under Attachment D, Section III: Occupancy Policies and Section IV: Self-Sufficiency/Support Services to create an admission preference for elderly applicants to create an optimal mix of elderly (62+), near elderly (55 – 61 years old), and non-elderly, disabled.

Under this admissions policy, management agents must admit four elderly or near-elderly applicants before the community admits a non-elderly, disabled applicant from their respective site-based waiting lists. This preferred admission policy helps AH reach and maintain an optimal mix of elderly and non-elderly disabled residents in AH-owned and AH-assisted communities. Such a preference creates a healthy, diverse population that helps to improve the quality of life for all residents. Because of the mix, an assortment of services and resources are accessible for all residents, regardless of age or ability, to engage in and improve the aging process.

iii. Planned Non-Significant Changes

AH does not have any non-significant changes planned for this activity.

iv. Planned Changes to Metrics/Data Collection

AH may add other HUD Standard Metrics to better assess the performance of this activity. Additional HUD Standard Metrics, if any, will appear in AH's MTW Annual Report. HUD Standard Metrics under consideration include:

- HC #3: Decrease in Wait List Time
- HC #4: Displacement Prevention

AH does not plan any changes to the Metrics nor the data collection tools or methodology.

v. Planned Significant Changes

AH does not have any significant changes planned for this activity.

SH.2005.09 – DEVELOPING ALTERNATE AND SUPPORTIVE HOUSING

i. Plan Year Approved, Implemented, Amended

Activity approved and implemented in FY 2005.

ii. Description/Update

Utilizing MTW Authorizations under Attachment D, Section V.A.2.f, Section VII.A: . . . authorized to create its own Housing Choice Voucher (HCV) Program, and Section VII.B.1 – 3: Simplification of the Process to Project-Base Section 8 Vouchers of its Amended and Restated MTW Agreement AH earmarked resources for alternative housing initiatives for chronically homeless families. Originally, this activity functioned as two separate activities, where one activity supported AH allocating vouchers to provide subsidy for supportive housing communities. The city of Atlanta or designated agency identified development projects and AH administered allocated vouchers.

The other activity worked to support new supportive housing developments for senior and disabled population groups, especially those with mental disabilities inappropriately housed in AH high-rises because of the lack of supportive services to meet their unique needs.

These individual activities, Developing Alternative Housing Resources and Developing Supportive Housing, AH has since merged. However, the original concept remains intact, where the plan focused on targeted homeless assistance programs, but has since included Supportive Services: Non-targeted or Mainstream Programs.

Through this activity, AH and its development partner created Oasis, 60, 100% affordable rental units at Scholars Landing and continues pursuit of alternative living spaces and development of supportive housing for the benefit of independent living.

iii. Planned Non-Significant Changes

AH does not have any non-significant changes planned for this activity.

iv. Planned Changes to Metrics/Data Collection

AH may change HUD Standard Metrics to better assess the performance of this activity. Revised HUD Standard Metrics, if any, will appear in AH's MTW Annual Report. HUD Standard Metrics under consideration include:

- HC #1: Additional Units of Housing Made Available
- HC #4: Displacement Prevention

AH does not plan to any changes to its data collection tools nor data collection methodology.

v. Planned Significant Changes

AH does not have any significant changes planned for this activity.

RE.2005.09 – REFORMUATING SUBSIDY ARRANGEMENT IN AH-SPONSORED MIXED-USE COMMUNITIES, INCLUDING CENTENNIAL PLACE AND AH’S AFFORDABLE COMMUNITIES

i. Plan Year Approved, Implemented, Amended

Activity approved and implemented in FY 2005.

ii. Description/Update

Under this activity, AH utilizes MTW Authorizations under Attachment D, Section V: Single Fund Budget with Full Flexibility and Section VII.C: Demonstration Program on Project-Based Financing of its Amended and Restated Agreement to convert the form of operating subsidy and streamline compliance and reporting requirements.

As part of its implementation strategy, AH worked closely with development partners and financial stakeholders to create a structure and funding mechanism that essentially created AH-sponsored mixed-income, mixed-finance communities and AH-owned communities that include public housing units and HomeFlex subsidized units focused on sustaining and preserving affordable housing units.

Further, AH worked closely with HUD to design a program structure and process for implementation that included the Centennial Place demonstration model (HUD-approved November 2, 2012) to pilot this Reformulation Demonstration Program. On April 23, 2013, AH received additional Housing Choice funding or Temporary Protection Vouchers (TPVs) to replace the public housing operating subsidy once subsidy converted. AH converted Section 9 operating subsidy to Section 8 Project-Based Voucher (PBV) assistance and repositioned 301 AH-assisted units at Centennial Place in FY 2015 to allow the units will carry their aliquot share of the debt service, equity requirements, and operating costs for the property for the long-term sustainability of the development.

In FY 2016, AH’s development partner received LIHTC funding for Phase II. Through utilization of tax credits, the development partner will continue the rehabilitation of Phases III and IV of Centennial Place. As of FY 2018, AH continues with implementation of this activity and continues to explore reformulation/conversion strategies that will improve long-term financial sustainability and preserve the public and private investments in other mixed-income and AH-owned rental communities.

iii. Planned Non-Significant Changes

AH may change the name of this activity to avoid confusion as AH contemplates reformulation and conversion strategies for all communities in its rental portfolio; otherwise, AH does not have any non-significant changes planned for this activity.

iv. Planned Changes to Metrics/Data Collection

AH does not plan any changes to the Metrics nor the data collection tools or methodology.

- HC #2 – Units of Housing Preserved

v. Planned Significant Changes

AH does not have any significant changes planned for this activity.

RE.2005.10 – REVITALIZATION PROGRAM

i. Plan Year Approved, Implemented, Amended

Activity approved and implemented in FY 2005.

ii. Description/Update

AH utilizes MTW Authorizations **Section II.A.3 . . . becoming a catalyst for community revitalization, Section V.A.2.b . . . commercial facilities consistent with the objectives . . . , and Attachment G Good Cause Justification . . .** as well as other previously identified MTW Authorizations under Attachment D of its Restated and Amended MTW Agreement to revitalize ‘amenity-poor’ communities in which AH-Owned property is located.

Through this activity AH takes action to reposition its public housing properties into economically sustainable sites through direct and indirect investments that help make ‘amenity-poor’ communities amenity-rich communities and seen as first choice areas to live, work, and play. Although repositioning its public housing portfolio has commanded much of AH’s focus, the original concepts and vision has remained the same, which includes stabilizing local neighborhoods starving for re-integration into the surrounding community with great recreational facilities, retail and commercial ventures, and high-performing schools.

AH continues to own 11 sites scheduled for conversion to long-term Section 8 Project-Based Voucher (PBV) assistance under the Rental Assistance Demonstration (RAD) Program and through continued administration of this activity, AH’s revitalization plan will provide both incentives and increase housing choices for low-income families.

iii. Planned Non-Significant Changes

AH does not have any non-significant changes planned for this activity.

iv. Planned Changes to Metrics/Data Collection

AH does not have any planned changes to the Metrics/Data Collection methodology.

v. Planned Significant Changes

AH does not have any significant changes planned for this activity.

RE.2005.11 – GAP FINANCING

i. Plan Year Approved, Implemented, Amended.

Activity approved and implemented in FY 2005.

ii. Description/Update

To facilitate financial closings in development projects and to capitalize on investment opportunities, AH utilizes MTW Authorizations **Section V.A.2, Section V.A.2.b** under Attachment D of its Restated and Amended MTW Agreement. The intent of this activity is to meet and expand AH’s current business model as necessary to meet MTW Statutory Objectives, which may include providing gap financing construction loans, and similar short-term financial vehicles that alleviate the challenges in identifying investors and funders for proposed development projects.

Since real estate projects are about timing and location, AH proposed this MTW Activity to fund or co-invest with partners and minimize the number of misses on location and other investment opportunities. In addition, without an ability to participate in projects, projects become subjected to delayed or extended timelines, which contribute to increased construction costs. Under this MTW Activity, AH retains the ability to issue short-term construction loans to development partners that serves as a revenue stream to AH and a development incentive that expedites new

affordable housing opportunities. This MTW Activity is a direct complement of AH's efforts to focus on making its communities amenity-rich and first choice areas to live, work, and play.

iii. Planned Non-Significant Changes

AH does not have any non-significant changes planned for this activity.

iv. Planned Changes to Metrics/Data Collection

AH does not have any changes in metrics/data collection methodology planned for this activity.

v. Planned Significant Changes

AH does not have any significant changes planned for this activity.

HC.2006.01 – ATLANTA HOUSING SUBMARKET PAYMENT STANDARDS

i. Plan Year Approved, Implemented, Amended

Activity approved and implemented in FY 2006.

ii. Description/Update

In response to local market conditions, AH utilizes MTW Authorizations under Attachment D, Section VII.A.14 and 19 and Section VII.B.4.6 of its Amended and Restated MTW Agreement to identify submarkets in the service jurisdiction, adjust and determine Fair Market Rents (**FMRs**), or structure such for Section 8 assistance or initiatives.

Originally, AH consulted with an independent entity to develop its own Payment Standards. The firm identified seven submarkets and beginning in 2007, AH implemented separate payment standard schedules for each of the identified submarkets upon the establishment of new HAP contracts and at the recertification of existing contracts.

Based on market studies conducted in FY 2016, AH updated its submarket payment standards and expanded from seven submarkets to 23 submarkets. These new payment standards and submarket additions reflect the dramatic changes in Atlanta's real estate market since 2007.

By aligning its payment standards with actual single-family residential rental costs at the census-tract level, AH does not skew market rents for a neighborhood by the subsidy paid. The realignment of the rents allows AH better management of its subsidy allocation, which permits AH to provide more housing opportunities in low poverty and less impacted areas

Current plans include an update to AH's Submarket Payment Standards that are higher than the Small Area Fair Market Rents (SAFMR); nevertheless, most contract rents continue to be well within the payment standard limits for setting HAP payments or contract rents

iii. Planned Non-Significant Changes

AH does not have any non-significant changes planned for this activity.

iv. Planned Changes to Metrics/Data Collection

AH does not plan any changes to the Metrics nor the data collection tools or methodology.

- HC #5 – Increase Resident Mobility

v. Planned Significant Changes

AH does not have any significant changes planned for this activity.

RE.2006.02 – HOMEFLEX SITE-BASED ON-SITE ADMINISTRATION
(FORMERLY PROJECT-BASED RENTAL ASSISTANCE ON-SITE-ADMINISTRATION)

i. Plan Year Approved, Implemented, Amended

Activity approved in FY 2006 and implemented in FY 2007.

ii. Description/Update

Through implementation of this MTW Activity, AH utilizes MTW Authorizations under Attachment D, Section V: Single-Fund Budget with Full Flexibility, Section VII.A: AH is Authorized to Create its own Housing Choice Voucher Program, Section VII.B: Simplification of the Process to Project Base Section 8 Vouchers, and Section VII.C: Demonstration Program on Project-Based Financing of its Amended and Restated MTW Agreement to create a Project-Based Rental Assistance (**PBRA**) program.

Originally, AH implemented this MTW Activity to eliminate duplicative administrative processes, eligibility determinations, and resident screening with respect to leasing units at 28 PBRA communities. In addition, AH used this MTW Activity to launch a homeless demonstration program and a supportive housing program for persons with developmental disabilities and chronic mental illness at seven communities owned by private owners. As part of the agreement, AH entered into seven two-year renewable PBRA contracts with private owners and supportive services were funded and provided by a third party for a minimum of two-years.

Since inception of this MTW Activity, AH re-branded this activity to reduce confusion with HUD's PBRA Program. AH re-branded its program as HomeFlex. Agreements with private owners under this activity range in duration from two to 20 years. The owner entities and their professional management agents have full responsibility of the property, which is subject to AH inspections and reviews, for the administrative and programmatic functions carried out in connection with admissions and occupancy procedures relating to HomeFlex assisted units. This process makes the HomeFlex program attractive to private sector real estate professionals by allowing them to manage and mitigate their market risk associated with owning and implementing the program. This activity increases housing choices for specific at-risk populations.

iii. Planned Non-Significant Changes

AH does not have any non-significant changes planned for this activity.

iv. Planned Changes to Metrics/Data Collection

AH may add HUD Standard Metrics to better assess the performance of this activity. Revised HUD Standard Metrics, if any, will appear in AH's MTW Annual Report. HUD Standard Metrics under consideration include:

- HC #1: Additional Units of Housing Made Available
- HC #2: Units of Housing Preserved

AH does not plan to any changes to its data collection tools nor data collection methodology.

v. Planned Significant Changes

AH does not have any significant changes planned for this activity.

HC.2007.01 – RE-ENGINEERING THE HOUSING CHOICE VOUCHER PROGRAM

i. Plan Year Approved, Implemented, Amended

Activity approved and implemented in FY 2007.

ii. Description/Update

To meet an ever-changing real estate market and to increase the availability of inventory within its service jurisdiction, AH utilizes MTW Authorizations under Attachment D, Section VII.A: AH is Authorized to Create its own Housing Choice Voucher (**HCV**) Program of its Amended and Restated MTW Agreement to develop new policies and procedures in the administration of its HCV Program.

Initially, AH introduced this MTW Activity to take advantage of cost efficiencies to move AH closer to a paperless, state-of-the-art, client-focused, self-servicing program, where the key areas focused on and continue to include **Organizational Structure, Systems and Processes, Training and Capacity Building, Customer Service Delivery, and State-of-the-Art Technology**.

Since implementation of this MTW Activity, AH has replaced paper files with electronic files and e-copied all permanent documents, created an online portal for property owners, and created a call center to improve customer service response times. Other re-engineering innovation implemented under this activity include measures designed to enhance and streamline core business processes and related policies, procedures, and business documents.

AH's HCVP's core business processes includes 1- Waitlist, 2- Portability, 3- Eligibility & Voucher Issuance, 4- Referrals, 5- Landlord Eligibility & Request for Tenancy Approval (**RTA**), 6- Unit Eligibility, 7- HAP & Utility Allowance (**UA**), 8- HAP Contract & Contract Maintenance, 9- Recertification, 10- Move Request, 11- Inquiry Management, 12-Compliance. AH examines these core business processes and operating policies annually, and as applicable, modifies these policies to align them with industry best practices and, as appropriate, mirror them to private sector business practices. Through these examinations and alignments, AH is able to eliminate/reduce administrative steps that delay or elongate lease-ups, burdening the process times, while outlining Family Obligations for program participants.

The nuances of this activity distinguish procedures for single-family and multi-family properties, as well as difference between new property owner partners and tenured, experienced property owner partners with a reliable record. In addition, AH continues to face tough choices between property owner partners seeking rents that keep pace with a rising market and voucher holding families that struggle to find available, appropriately sized units.

In response to Atlanta's tight real estate market and the ongoing dilemma described above, AH created a Landlord Advisory Group in FY 2016 to examine processes and procedures and AH continues to streamline its internal business processes and systems. Both efforts are undertaken with the goal of ensuring that affordable privately owned housing options remain available in the city of Atlanta. Listed below are some actions under this activity:

- **Applicant/Participant Education** – an educational program designed to better equip prospective program participants with information to help them identify and secure quality housing.
- **Self-Certification Inspections at Multi-Family Properties** – permits self-certification inspections, approved by the participant and the property owner:
 - At high performing properties (score of ≥ 97 on AH's comprehensive property assessments) AH expedites the processing of housing assistance contracts and lease

addendums. This action has reduced the lease up timeframe from an average of 25 days to 5 to 7 days. AH continues random quality control inspections at these properties.

- At standard performing properties (score of ≥ 87 on AH's comprehensive property assessments) AH conducts follow-up inspections within 60 days following unit lease-up.
- **Marketing Plan** – focused outreach effort to recruit non-participating property owners of large multifamily property and retain existing property owners' units into AH's HCV Program. The outreach effort also includes, raising awareness of the benefits of working with AH, debunking myths about families receiving rental assistance, and educating property owners on the HCV Program.
- **Rent Determination** – this element of the activity offers upfront rent estimates and fixed-rate boosts on units for major system upgrades. In addition, this element allows property owners to submit comparable rents including leases for comparable units and certain multiple listing service rents.

iii. Planned Non-Significant Changes

AH does not have any non-significant changes planned for this activity.

iv. Planned Changes to Metrics/Data Collection

AH does not plan any changes to the Metrics nor the data collection tools or methodology.

v. Planned Significant Changes

AH does not have any significant changes planned for this activity.

HC.2007.02 – RENT REASONABLENESS

i. Plan Year Approved, Implemented, Amended

Activity approved and implemented in FY 2007.

ii. Description/Update

AH utilizes MTW Authorizations under Attachment D, Section VII: Establishment of Housing Choice Voucher Program develop its own rent reasonableness determination for properties owned directly and indirectly by AH instead of utilizing a third-party independent market analysis to establish the market equivalent rent for each residential unit in AH's Housing Choice Voucher Program.

Under this activity, AH may continue utilization of third-party independent market analysis because of internal real estate expertise and knowledge of rents in the Atlanta market and AH's workload. Overall, this activity provides an improved and consistent rent determination outcome that stabilize Housing Choice contract rents in line with the rental market and available subsidy resources. Rent determinations reflect the changing market rent dynamics and realities of the residential real estate market and more accurate and timely determinations allow HAP savings.

AH introduced updated submarket payment standards in FY 2016, while all rents are subject to rent reasonableness determinations, AH expects the cumulative effects of the payment standards to increase certain HAP costs, however, AH does not expect the rents do not rise to the full level of AH's higher alternative payment standards.

iii. Planned Non-Significant Changes

AH does not have any non-significant changes planned for this activity beyond its point of clarification that AH intended to and retains the option to conduct rent reasonableness determinations on units owned directly or indirectly by AH when proposing this activity.

iv. Planned Changes to Metrics/Data Collection

AH may add HUD Standard Metrics to better assess the performance of this activity. Revised HUD Standard Metrics, if any, will appear in AH's MTW Annual Report. HUD Standard Metrics under consideration include:

- CE #1: Agency Cost Savings
- CE #6: Reducing Per Unit Subsidy Costs for Participating Households

AH does not plan to any changes to its data collection tools nor data collection methodology.

v. Planned Significant Changes

AH does not have any significant changes planned for this activity.

RE.2007.03 – COMPREHENSIVE HOMEOWNERSHIP PROGRAM

i. Plan Year Approved, Implemented, Amended

Activity approved and implemented in FY 2007.

ii. Description/Update

Utilizing multiple MTW Authorization elements under Attachment D, Section V.A: Single Fund Budget with Full Flexibility AH created a program that increases affordable homeownership opportunities for low-income families and develops affordable homeownership opportunities in healthy, mixed-income communities through the following approaches:

- (1) Provision of mortgage payment assistance to qualified HCV Program participants purchasing a home under the HCV Homeownership Program. Eligible households receiving this assistance is limited by time or terms (usually 15 years).
- (2) Provision of a subordinated mortgage loan to qualified households that earn up to 80 percent (may increase up to 115 percent based on funding source(s)) of the area median income (AMI), are first-time homebuyers, and purchase within the city of Atlanta. The subordinated mortgage loan is a one-time assistance product and forgivable at 20% annually (or a 5-year period).

As developed, AH's homeownership program can be used with other down payment assistance programs and prepares low- to moderate- income families in becoming successful homeowners while helping to reduce the inventory, newly constructed and existing, of single-family units in the market.

iii. Planned Non-Significant Changes

AH does not have any non-significant changes planned for this activity.

iv. Planned Changes to Metrics/Data Collection

Because AH does not maintain data on homeowners, AH plans to remove the following HUD Standard Metric:

- SS #8: Households Transitioned to Self-Sufficiency

AH does not plan to any changes to its data collection tools nor data collection methodology.

v. Planned Significant Changes

AH does not have any significant changes planned for this activity.

RE.2007.04 – HOMEFLEX AS A STRATEGIC TOOL

(FORMERLY PROJECT-BASED RENTAL ASSISTANCE AS A STRATEGIC TOOL)

i. Plan Year Approved, Implemented, Amended

Activity approved and implemented in FY 2007.

ii. Description/Update

AH utilized MTW Authorizations under Attachment D Section V.A: Single Fund Budget with Full Flexibility, Section VII.B: Simplification of the Process to Project-Base Section 8 Vouchers, and Section VII.C: Demonstration Program on Project-Based Financing to design its MTW Project Based Rental Assistance (**PBRA**) Program (now called “HomeFlex”) through a competitive process.

Under this activity, AH is able to project-base rental assistance at communities owned directly or indirectly by AH without engaging in a competitive process. Based on the expanded authorizations, the AH Board of Commissioners establishes project limits on AH-owned properties. Therefore, AH may project-base up to 100% assistance at communities owned by AH and exceed HUD project caps (25% and 50% in the case of RAD) and program cap limits, percent increase, project cap limits and similar limitations outlined in HOTMA.

In addition, this activity authorizes AH to solicit private developers and owners interested in reserving a percentage of their multi-family rental units for eligible low-income families and accepting a monthly subsidy or project-base assistance in return. Under this element of the HomeFlex Program, the subsidy remains with the unit, not the family. Therefore, when families move out the subsidy remains available for the next eligible family moving into the unit. Because AH’s MTW Agreement provides flexibility in administering its PBV Program and in accordance with its Reformulation Initiative and RAD conversions AH may exceed program caps, project caps, percentage limits, and similar limitation thresholds listed under current and future HUD guidance.

Further, this activity permits AH to receive and approve proposals, solicited and unsolicited, from developers for multi-family rental properties outside of AH’s service jurisdiction. Such examples may include negotiating intergovernmental agreements with PHAs, local government entities, or non-profit/for-profit organizations interested in reserving a percentage of their multi-family rental units in the Atlanta metropolitan area for eligible, low-income families.

Through this HomeFlex, AH made more than 5,000 affordable units, both new and existing, available in the city and this activity helped AH increase the stock of affordable housing units effectively and efficiently because AH is not incurring the long-term debt and other ongoing costs associated with new construction and significant rehabilitation of multifamily and single-family housing units. A HomeFlex commitment makes units affordable for a long period, at least 10 years, and an extension beyond the initial 10-year period is available upon met conditions and mutual agreement. This option helps to stabilize families, the property, and communities.

A peripheral benefit of this activity, through successful endeavors under project-base assistance, addresses the shortage of property owners in the city that accept rental assistance, which will increase the number of housing choices for voucher-holding families searching for affordable housing in healthy, mixed-income communities where property owners accept rental assistance.

Finally, under this activity, AH will utilize its HomeFlex Program, which is a lower administration cost, to subsidize more units, develop supportive housing for specific segments of the population that require supportive services, and other housing solutions that provides direct assistance/access to areas of opportunities for eligible families, while it alleviates concentration of poverty on low-income census tracts.

iii. Planned Non-Significant Changes

AH does not have any non-significant changes planned for this activity.

iv. Planned Changes to Metrics/Data Collection

AH does not plan any changes to the Metrics nor the data collection tools or methodology.

v. Planned Significant Changes

AH does not have any significant changes planned for this activity.

AW.2008.01 – RENT SIMPLIFICATION / AH STANDARD DEDUCTIONS

i. Plan Year Approved, Implemented, Amended

Activity approved and implemented in FY 2008.

ii. Description/Update

Through utilization of MTW Authorizations under Attachment D Sections I.G and H: General Conditions, AH simplifies the rent calculation and standard deduction for all of its rental assistance programs. Under this activity, AH changes the treatment of assets used to calculate an assisted household's rental amount by eliminating the burden and potentially inaccurate process of verifying unreimbursed out-of-pocket expenses. The goal is to streamline the rental calculation operations.

In addition, this activity increases the HUD standard deduction for households with dependents and elderly and disabled households to create and provide an equitable approach for all assisted families. AH tables its deduction changes below:

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

Before implementation of this activity, AH determined that 80 to 85 percent of assisted families, across all programs, were not claiming "other deductions" relating to unreimbursed medical expenses, attendant care and medical equipment, and childcare expenses. AH submits that its Standard Deductions improve and add value to the integrity and accuracy of rent. AH acknowledges that subsidy determinations and operating efficiencies and effectiveness will improve over time across all programs. Since the agency should spend less time collecting and processing receipts, theoretically, the agency should record fewer errors because of the changes.

iii. Planned Non-Significant Changes

AH does not have any non-significant changes planned for this activity.

iv. Planned Changes to Metrics/Data Collection

AH does not plan any changes to the Metrics nor the data collection tools or methodology.

v. Planned Significant Changes

AH does not have any significant changes planned for this activity.

HC.2008.02 – LEASING INCENTIVE FEES

i. Plan Year Approved, Implemented, Amended

Activity approved and implemented in FY 2008.

ii. Description/Update

Utilizing MTW Authorization under Attachment D Section VII.A: AH is Authorized to Create its Own HCV Program, AH implemented a de-concentration strategy to provide leasing incentive fees (LIFs) to property owners to lease their units to families affected by the relocation efforts triggered by demolition of AH-owned communities. Since originally implemented, the activity has evolved in FY 2016 to create a faster program move process.

Under this activity, AH provides incentives for both prospective program participants and property owners to work together to find units and submit the Request for Tenancy (**RTA**) within 30 days of voucher issuance. The LIFs serve to assist in removing obstacles and barriers that prevent many low-income families from leasing quality housing. The incentive defrays the costs of application fees, security deposits, and similar out-of-pocket costs not always accessible to voucher holding families, especially first time renters. The LIFs also help to attract property owners with units in areas of opportunities, which increases the rental supply and the number of property owner partners accepting vouchers. Finally, AH offers New Contract Incentives to property owners with Single Family Homes to help increase the affordable rental supply. AH provides a one-time unit incentive payment to single-family property owners each time their unit passes HQS Inspections on the initial inspection and they subsequently lease their units to a HCV applicant/participant under a new HAP contract.

iii. Planned Non-Significant Changes

AH does not have any non-significant changes planned for this activity.

iv. Planned Changes to Metrics/Data Collection

AH does not plan any changes to the Metrics nor the data collection tools or methodology.

v. Planned Significant Changes

AH does not have any significant changes planned for this activity.

PH.2008.03 – ENERGY PERFORMANCE CONTRACTING

i. Plan Year Approved, Implemented, Amended

Activity approved and implemented in FY 2008.

ii. Description/Update

AH utilizes MTW Authorization under Attachment D, Section IX: Energy Performance Contracting to employ energy conservation and efficiency standards, practices and improvements to its properties while enhancing the quality of the living environment for its residents. Under this activity, AH utilizes an Energy Performance Contract (**EPC**) to facilitate upgrades at its Residential Communities and pursue green initiatives, with and without MTW funds.

AH is working with Johnson Controls in administering a FY 2011 EPC, AH's second EPC. Under this activity, AH is able to leverage a \$9.1 million EPC loan with MTW funds to modernize its communities by replacing older equipment, fixtures, and systems with newer, energy-efficient, earth craft (in some cases) equipment, fixtures, and systems. Some examples under this activity include new Heating Ventilation and Air Conditioning (**HVAC**) systems, upgraded bathrooms with low-flow faucets, showers, and toilets, and modern light fixtures with compact fluorescent, LED, or other current light sources.

These capital improvements complement and supplement the ARRA renovations begun in FY 2010 and AH will continue to implement energy conservation measures as is determined to be necessary when recapitalizing AH-owned properties converted to project-based voucher units under the RAD Program.

The cost-savings have been higher than projected and through utilization of this activity, AH is authorized to retain up to 50 percent of cost savings under the EPC, which is above the 25% cost savings allowed for non MTW PHAs. AH plans to reinvest savings for other improvements and services.

iii. Planned Non-Significant Changes

AH does not have any non-significant changes planned for this activity.

iv. Planned Changes to Metrics/Data Collection

AH does not plan any changes to the Metrics nor the data collection tools or methodology.

v. Planned Significant Changes

AH does not have any significant changes planned for this activity.

AW.2011.01 – NON-ELDERLY DISABLED INCOME DISREGARD (REPROPOSED)

AH combines this activity and directs the reader to see **page 104** of this document for details.

HC.2011.02 – HOUSING CHOICE VOUCHER (HCV) PROGRAM HOUSING ASSISTANCE PAYMENT (HAP) ABATEMENT POLICY

i. Plan Year Approved, Implemented, Amended

Activity approved and implemented in FY 2011.

ii. Description/Update

Through utilization of MTW Authorizations under Attachment D Sections VII.A and B: AH is Authorized to Create its own Housing Choice Voucher Program AH, at its discretion, may develop and implement procedures and practices governing the abatement of housing assistance payments to owners whose rental unit fails to comply with AH's established standards.

AH establishes current procedures and practices under this policy and is set forth in the HCVP operating procedures. AH elevates expectations and standards with property owners under this MTW Activity, which have resulted in a higher caliber of units and property owners participating in the program.

iii. Planned Non-Significant Changes

AH does not have any non-significant changes planned for this activity.

iv. Planned Changes to Metrics/Data Collection

AH does not plan any changes to the Metrics nor the data collection tools or methodology.

v. Planned Significant Changes

AH does not have any significant changes planned for this activity.

PH.2011.03 – AGING WELL PROGRAM

i. Plan Year Approved, Implemented, Amended

Activity approved and implemented in FY 2011.

ii. Description/Update

In support of AH's efforts to enhance the delivery of case management and supportive services to the elderly and persons with disabilities, AH utilizes MTW Authorizations under Attachment D, Section IV: Self-Sufficiency/Supportive Services and Section V.A: Single Fund Budget with Full Flexibility to design a place-based, supportive services program.

Under this activity, AH collaborates with the Atlanta Regional Commission, Area Agency on Aging and others to implement a pilot program using the Naturally Occurring Retirement Community (NORC) model at AH-owned high-rise communities. NORC is a national program model focused on enabling adults to "age in place" and builds the community capacity to support the process by placing a strong emphasis on resident involvement with priorities set by residents.

AH works with the PMDs network of service providers and local universities: (i) to provide activities and learning experiences for the residents that address the "7 Dimensions of Whole Person Wellness," and (ii) to connect residents with resources to support their physical and mental wellness. While not considered an MTW Activity, AH's use of American Recovery and Reinvestment Act (ARRA) funds to renovate the AH-Owned Residential Communities was informed by the Aging Well strategy. The \$20 million renovations included:

- **Site Improvements** – Parking lot, sidewalk and street repairs as well as landscaping and exterior recreation space enhancements.
- **Common Areas** – Lobby, common area, and specialty, function room renovations, including community room, Internet café, TV/media room, fitness center, mailroom, wellness services suite, and resident association offices.

These physical improvements facilitate greater socialization and engagement by residents, while providing private rooms for working with service providers. Residents have access to on-site Service Coordinators who help refer and link residents to community-based resources to meet their health and wellness needs. Each property also has on-site programs and activities that promote wellness such as dance and fitness classes, resource fairs, computer classes, nutrition classes, vision screening, podiatry screening, behavioral health practitioner visits, and nursing student visits.

AH will continue to promote active aging at the AH-Owned Residential Communities balancing this initiative with the limited funding for operating and managing the properties and new initiatives that capitalize on the economy of scale created by the concentration of individuals with similar needs. Compared to the baseline prior to implementation, all AH-owned community residents now have the ability to access services and resources needed to be in control of decisions that affect their lives and the aging process.

iii. Planned Non-Significant Changes

AH does not have any non-significant changes planned for this activity.

iv. Planned Changes to Metrics/Data Collection

AH does not plan any changes to the Metrics nor the data collection tools or methodology.

v. Planned Significant Changes

AH does not have any significant changes planned for this activity.

RE.2012.01 – SINGLE-FAMILY HOME RENTAL DEMONSTRATION

i. Plan Year Approved, Implemented, Amended

Activity approved and implemented in FY 2012.

ii. Description/Update

Under this activity, AH utilizes MTW Authorizations under Attachment D Section V.A: Single Fund Budget with Full Flexibility for neighborhood stabilization by selling developed or undeveloped AH-owned/controlled parcels to a Mechanicsville development partner for families at or below 60 percent AMI for this demonstration program. Low-Income Housing Tax Credits (**LIHTC**) help achieve affordable rentals for AH's development partner that has been engaged in predevelopment activities for the development of 75 scattered-site rental units.

The LIHTC Program covers a 15-year period and 25 of the 75 units will sit on AH-owned property under the terms of a ground lease with a purchase option at the end of the period. AH does not provide any subsidy to the families as the development is part of a lease-to-own program. Therefore, families that increase their income sufficiently to become a qualified buyer, have the opportunity to purchase the home, which promotes neighborhood stabilization.

iii. Planned Non-Significant Changes

AH does not have any non-significant changes planned for this activity.

iv. Planned Changes to Metrics/Data Collection

AH does not plan any changes to the Metrics nor the data collection tools or methodology.

v. Planned Significant Changes

AH does not have any significant changes planned for this activity.

SH.2013.01 – VETERANS SUPPORTIVE HOUSING

i. Plan Year Approved, Implemented, Amended

Activity approved and implemented in FY 2013.

ii. Description/Update

By using its MTW designation, AH created HomeFlex, a local project-based voucher program, which includes an element that focuses on supportive housing for specific segments of the population. Through utilization of MTW Authorizations under Attachment D, Section VII.A: AH is Authorized to Create its own HCV Program, and Section VII.B: Simplification of the Process to Project-Base Section 8 Vouchers, AH provides a selection preference for veterans of the United States Armed Forces and provides supportive housing for veterans.

The HUD-VASH vouchers program is not an MTW activity, but is operated under AH's Supportive Housing policies and administered through AH's Housing Choice Program. AH uses its HomeFlex program and tenant-based vouchers to help house veterans. Under AH's HomeFlex for Supportive Housing Program, owners and developers of supportive housing receive housing subsidy under HomeFlex agreement with AH for up to two years. In return, the owner is required to 1) work with a certified Service Coordinator such as the United Way and 2) enter into an agreement with one or more service providers who will provide appropriate intensive support services for the target population. In addition, owners/developers also agree to coordinate with any public agencies and nonprofit organizations that can provide additional case support to individual residents.

In an effort to maximize housing opportunities for veterans and alleviate the housing search burden, AH may project-base VASH voucher assistance throughout the city. Oasis at Scholars

Landing opened in FY 2015 and provides 60 affordable assisted rental units for seniors with a veterans' preference.

iii. Planned Non-Significant Changes

AH does not have any non-significant changes planned for this activity.

iv. Planned Changes to Metrics/Data Collection

AH does not plan any changes to the Metrics nor the data collection tools or methodology.

v. Planned Significant Changes

AH does not have any significant changes planned for this activity.

PH.2017.01 – ELIMINATION OF FLAT RENT

i. Plan Year Approved, Implemented, Amended

Activity approved and implemented in FY 2003; amended in FY 2017.

ii. Description/Update

Originally, HUD approved this activity as PH.2003.01 – Affordable Fixed Rent/Affordable Flat Rent. In FY 2015, AH amended its flat rent policies to comply with the statutory changes contained within Public Law 113 – 76, the Fiscal Year 2014 Appropriations Act. Under this public law, HUD required that all flat rents be set at no less than 80 percent of the applicable Fair Market Rent (FMR) adjusted, if necessary, to account for reasonable utilities costs.

In FY 2017, AH utilized MTW Authorizations under Attachment D, Section I.O: General Conditions, Section IV: Self-Sufficiency/Supportive Services, and Section V.A: Single Fund Budget with Full Flexibility to offer an alternative to flat rents and create the ability to explore rent structures consistent with AH's business model. Under this activity, AH eliminates flat rents across all of its rental assistance programs, as applicable, and offers only income-based rent at these properties.

There are compelling reasons to continue the elimination of flat rent:

- 1) It is aligned with HUD changes that require that flat rents be set at no less than 80% of the applicable Fair Market Rent (**FMR**) or Small Area Fair Market Rent (**SAFMR**);
- 2) It better ensures program participants pay their fair share of the rental amount, potentially lowers the subsidy amount as participants do better, and reduces staff errors;
- 3) It better prepares higher income participants for life after assisted housing and in market rate housing;
- 4) It creates an organic transition for occupants residing in communities that will convert subsidy assistance from public housing to Section 8
- 5) It was a seldom-used option, only 1.3% of households elected to use this option;
- 6) Its impact on participants was minimal according to AH's impact analysis (FY 2016 Report);
- 7) It is outdated and income-based rents are more consistent with HUD's emphasis on creating greater housing opportunities for those most in need; and
- 8) It creates an unnecessary administrative burden on AH's staff and Property Management Developer (PMD) partners to monitor, track, adjust flat rents for a few participants.

As AH converts public housing units to long-term Section 8 Project-Based Voucher assistance under the Rental Assistance Demonstration (RAD) Program and AH's HomeFlex Program continues to grow, eventually all households will pay income-adjusted rents. AH communicated changes with affected families during FY 2017. To prevent hardship to future participants, AH only offers income-based rent to its new admissions.

iii. Planned Non-Significant Changes

AH does not have any non-significant changes planned for this activity.

iv. Planned Changes to Metrics/Data Collection

AH does not plan any changes to the Metrics nor the data collection tools or methodology.

v. Planned Significant Changes

AH does not have any significant changes planned for this activity.

B. NOT YET IMPLEMENTED ACTIVITIES

SH.2017.01 – NEXT STEP YOUTH SELF-SUFFICIENCY PROGRAM

i. Describe the approved MTW activity that was proposed in an Annual MTW Plan, approved by HUD, and not yet implemented

AH utilized MTW Authorizations under Attachment D, Section VII: Establishment of HCV Program to develop and implement a program specific alternative supportive housing resource for income eligible youth aging out of foster care. Through this activity and other supportive housing initiatives, AH intends to work with the Georgia Department of Human Services, Division of Family and Children Services (DFCS) to provide up to 25 tenant-based vouchers (TBVs) to house youth transitioning out of foster care to an independent living environment.

This activity focuses on assisting transitioning youth between 18 to 23 years old that are working with the state supported Independent Living Program (ILP) to help eligible youth stabilize their living situation, prevent homelessness, and move toward economic independence and housing self-sufficiency. Under this activity, AH will provide up to 25 vouchers for properly vetted, properly referred youth transitioning out of foster care for up to 36 months or age 23, whichever comes first. Vouchers, at AH discretion, may become extended for up to 12 months to allow transitioning youth to complete their education requirements or achieve other life goals, which AH will evaluate on a case-by-case basis in consultation with DFCS.

In addition, this activity requires that transitioning youth begin, continue, and/or maintain appointments and visits with social service providers as recommended by DFCS (or its contracted ILP service providers) to assist these families in the preparation of living independently and creating a stable living environment. AH may withhold new issuances and may consider DFCS recommendations on whether to renew voucher contracts to transitioning youth that refuse or withdraw from appropriate service-level case management (or equivalent ILP requirements), including the refusal to meet AH's work/program requirements.

Vouchers issued under this activity are not portable, are subject to minimum rent and standard AH rent calculations, and alternative occupancy arrangements (e.g., shared housing and sponsored housing) may be considered as stipulated under AH's Statement of Corporate Policies.

ii. Provide an update on the implementation plan for the MTW activity

This activity requires a strong working partnership between AH, DFCS, and ILP, where AH will administer the vouchers, DFCS refers the transitioning youth, and ILP provides goal setting and case management and other services that move youth closer to economic independence and housing self-sufficiency.

The implementation of this activity is contingent upon AH receiving properly vetted, properly referred youth transitioning out of foster care from DFCS. Since approval of this activity, AH has

not received any referrals from DFCS. Therefore, AH will use FY 2020 to re-engage DFCS and make a final determination on this activity based on the FY 2020 engagement results.

- iii. **Provide an explanation of any non-significant changes or modifications to the MTW activity**
AH does not plan any non-significant changes or modifications to this activity.

C. ACTIVITIES ON HOLD

- i. **Describe the approved MTW activity that was approved, implemented and that the MTW PHA then stopped implementing**
N/A
- ii. **Provide an update on the plan for reactivating the MTW activity**
N/A
- iii. **Provide an explanation of any non-significant changes or modifications to the MTW activity**
N/A

D. CLOSED OUT ACTIVITIES

AH captures the bulleted information under this element in the table below.

- i. **List the closed out MTW activity. Specify the Plan Year(s) in which the MTW activity was approved, implemented (if applicable), and closed out**
- ii. **Explain why the MTW activity was closed out**

MTW Activity		Fiscal Year			Close Out Reason
Number	Name	Approval	Implementation	Close Out	
	American Recovery and Reinvestment Act (ARRA) of 2009	N/A	2009 ²	2012	AH did not need an MTW waiver to conduct this activity
	Voluntary Compliance Agreement (VCA)	N/A	2009 ³	2011	AH did not need an MTW waiver to conduct this activity
PH.2003.01	Affordable Fixed Rent / Affordable Flat Rent	2003	N/A	2017	AH combined this activity with PH.2017.01 – Elimination of Flat Rent
HD.2005.14	Individual Development Accounts (IDAs)	2005	N/A	2019	AH elected not to implement this MTW Activity
HC.2006.03	Housing Choice Inspection Fees	2006	N/A	2019	AH determined that this activity requires more research. AH may propose this activity at a later date
HD.2006.04	Standards for Residency in Single-Family Homes	2006	N/A	2008	AH did not need an MTW waiver to conduct this activity
HC.2006.05	Port Administration Re-engineering	2006	N/A	2019	Activity was not supported under MTW Authorizations

² AH's estimated implementation year of Federal grant award.

³ AH made enhancements and improvements to facilities, programs, policies, and procedures in response to accessibility requirements

MTW Activity		Fiscal Year			Close Out Reason
Number	Name	Approval	Implementation	Close Out	
HD.2007.05	Housing Choice Family Self-Sufficiency (FSS) Program Re-engineering	2007	N/A	2008	AH combined this activity with RE.2007.03 – Comprehensive Homeownership Program
RE.2007.06	Quality of Life Initiative (QLI)	2007	2007	2010	AH did not need an MTW waiver to conduct this activity
PH.2007.07	Utility Allowance Waiver	2007	2007	2010	AH elected to close out this activity based on AH analysis (admin costs outweighed revenue)
SH.2008.04	John O. Chiles Annex Supportive Housing Pilot	2008	2008	2014	AH did not need an MTW waiver to conduct this activity
HD.2008.05	Pre-Relocation Client Education (part of QLI)	2008	2008	2010	AH did not need an MTW waiver to conduct this activity
AW.2010.01	Business Transformation Initiative (ERP solution)	2010	2010	2016	AH did not need an MTW waiver to conduct this activity
HC.2012.02	Comprehensive Graduation Program	2012	N/A	2019	AH determined that this activity requires more research. AH may propose this activity at a later date
HD.2013.02	Endowment Fund for Human Development Services	2013	N/A	2019	AH determined that this activity requires more research. AH may propose this activity at a later date
SH.2005.08	Independent Living Demonstration	2005	2005	2020	AH has not been able to move forward with this activity because of various local and state requirements. In addition, it is unclear if an MTW waiver(s) is required
AW.2011.01	Non-Elderly Disabled Income Disregard	2011	2011	2020	AH combines this activity with AW.2005.02 – Elderly Income Disregard and may be able to close both activities in accordance with Notice PIH 2016-05 (HA) – Streamlining Admin. Regs for Programs Administered by PHAs

(V) SOURCES AND USES OF MTW FUNDS

A. ESTIMATED SOURCES AND USES OF MTW FUNDS

i. Estimated Sources of MTW Funds

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

FDS LINE ITEM NUMBER	FDS LINE ITEM NAME	DOLLAR AMOUNT
70500 (70300+70400)	Total Tenant Revenue	\$4,370,026
70600	HUD PHA Operating Grants	\$321,080,471
70610	Capital Grants	\$1,000,000
70700 (70710+70720+70730+70740+70750)	Total Fee Revenue	\$486,483
71100+72000	Interest Income	\$342,603
71600	Gain or Loss on Sale of Capital Assets	\$0
71200+71300+71310+71400+71500	Other Income	\$1,274,785
70000	Total Revenue	\$328,554,368

ii. Estimated Uses of MTW Funds

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

FDS LINE ITEM NUMBER	FDS LINE ITEM NAME	DOLLAR AMOUNT
91000 (91100+91200+91400+91500+91600+91700+91800+91900)	Total Operating - Administrative	\$57,217,562
91300+91310+92000	Management Fee Expense	\$918,024
91810	Allocated Overhead	\$0
92500 (92100+92200+92300+92400)	Total Tenant Services	\$2,922,251
93000 (93100+93600+93200+93300+93400+93800)	Total Utilities	\$2,915,191
93500+93700	Labor	\$0
94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	\$4,388,009
95000 (95100+95200+95300+95500)	Total Protective Services	\$1,366,380
96100 (96110+96120+96130+96140)	Total Insurance Premiums	\$927,423
96000 (96200+96210+96300+96400+96500+96600+96800)	Total Other General Expenses	\$10,153,111
96700 (96710+96720+96730)	Total Interest Expense & Amortization Cost	\$71,158
97100+97200	Total Extraordinary Maintenance	\$7,942,405
97300+97350	HAP + HAP Portability-In	\$160,541,561
97400	Depreciation Expense	\$0
97500+97600+97700+97800	All Other Expense	\$79,191,244
90000	Total Expenses	\$328,554,368

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

N/A

iii. Description of Planned Use of MTW Single Fund Flexibility

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

PLANNED USE OF MTW SINGLE FUND FLEXIBILITY

AH plans to continue to combine funding awarded under the HCV, PH, and Capital Funding Programs into a single, authority-wide funding source and use such funds for MTW eligible activities that permit it to design and administer housing assistance to eligible families. Planned uses may include:

- Providing capital funds or operating assistance to developed or newly acquired housing
- In the acquisition, construction, modernization, or substantial rehabilitation of housing or commercial facilities consistent with AH's demonstration objectives
- Providing housing, employment-related, and other case management services, including homeownership assistance, energy auditing, and activities related to self-sufficiency
- Provision of Housing Choice Voucher assistance, including project-base assistance independently or in conjunction with philanthropic, private, and/or public sources of assistance
- Activities related to the preservation of public housing or subsidized units serving low-income families
- Utilization of housing assistance payments (HAP) for purposes other than payments to owners in accordance with eligible uses of Section 8 and Section 9 funds

B. LOCAL ASSET MANAGEMENT PLAN

i. Is the MTW PHA allocating costs within statute?

No

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

Yes

ii. Has the MTW PHA provide a LAMP in the appendix?

Yes

iii. If the MTW PHA has provided a LAMP in the appendix, please describe any proposed changes to the LAMP in the Plan Year or state that the MTW PHA does not plan to make any changes in the Plan Year.

AH does not plan to make any changes in the Plan Year.

C. RENTAL ASSISTANCE DEMONSTRATION (RAD) PARTICIPATION

i. Description of RAD Participation

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

RENTAL ASSISTANCE DEMONSTRATION (RAD) PARTICIPATION

AH received a portfolio award to convert 3,741 PH units to long-term Section 8 assistance under the RAD Program. AH elected to convert its PH units to PBV assisted units. AH submitted a RAD Significant Amendment to HUD that HUD approved on November 15, 2016. AH has converted 423 units and plans to convert 786 units during FY 2021. AH received several Commitment to Enter into Housing Assistance Payments (CHAPs) in 2018. AH is working to convert those properties by FY 2022. AH anticipates that it will convert the remaining approved portfolio award by FYE 2027.

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

No

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

N/A

(VI) ADMINISTRATIVE

A. BOARD RESOLUTION AND CERTIFICATIONS OF COMPLIANCE

AH directs the reader to **page 143** of this document to review the Secretary's Certification and Board Resolution adopting AH's FY 2021 MTW Annual Plan and the corresponding Certifications of Compliance on **page 169**.

B. DOCUMENTATION OF PUBLIC PROCESS

AH directs the reader to **page 172** of this document to review AH's public process that includes dates, location, and number of attendees. AH held a series of public meetings and a public hearing with AH Stakeholders during the planning and preparation process. All public comments received through March 13, 2020 are included in this document.

C. PLANNED AND ONGOING EVALUATIONS

Although AH is not required to conduct any evaluations on its MTW Demonstration or any of its specific MTW Activities pursuant to its Amended and Restated MTW Agreement, AH directs the reader to **page 186** of this document to review planned or ongoing evaluations. In accordance with stated management plans, AH may resume third-party evaluations, may conduct internal evaluations, or may consider hybrid evaluations in the future.

D. LOBBYING DISCLOSURES

AH directs the reader to **page 171** of this document to review applicable Lobbying Disclosures.

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APPENDIX C

RESOLUTION AND CERTIFICATIONS

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BOARD RESOLUTION AND CERTIFICATIONS OF COMPLIANCE

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SECRETARY'S CERTIFICATE

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

1. I am the presently appointed and qualified Secretary of the Board of Commissioners of The Housing Authority of the City of Atlanta, Georgia ("AH"). In such capacity, I am custodian of its records and I am familiar with its organization, membership and activities.
2. Attached hereto as Exhibit 1 is a true and correct copy of the resolution authorizing AH to submit its Fiscal Year 2021 Moving To Work Annual Plan to the United States Department of Housing and Urban Development and to implement the projects, activities, initiatives and any policy changes described therein, and other related matters.
3. This resolution was presented to the AH Board of Commissioners (the "Board") at its Regular Meeting on May 27, 2020 (the "Meeting").
4. The following Board members were present for the Meeting:

Christopher R. Edwards, M.D., Chair
James Allen, Jr.
Petrina Howard
Robert Highsmith
Kirk Rich
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 27th day of May 2020.



Designated by:
Eugene E. Jones, Jr.
EUGENE E. JONES, JR.
Secretary

**RESOLUTION
OPS-1**

**TO AUTHORIZE THE HOUSING AUTHORITY OF THE CITY OF ATLANTA,
GEORGIA TO SUBMIT FISCAL YEAR 2021 MOVING TO WORK ANNUAL PLAN
TO THE UNITED STATES DEPARTMENT OF HOUSING AND URBAN
DEVELOPMENT**

WHEREAS, The Housing Authority of the City of Atlanta, Georgia ("AH") executed its Amended and Restated Moving To Work 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; and as extended by Congress to June 30, 2028 under the same terms and conditions confirmed by the United States Department of Housing and Urban Development ("HUD") on April 14, 2016;

WHEREAS, the MTW Agreement is effective through June 30, 2028, unless further extended;

WHEREAS, the MTW Agreement requires AH to submit an MTW Annual Plan to HUD in lieu of the Annual Plan and Five-Year Plan traditionally required by Section 5A of the United States Housing Act of 1937, as amended;

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

WHEREAS, AH has prepared its Fiscal Year ("FY") 2021 MTW Annual Plan (also referred to herein as the "FY 2021 MTW Annual Plan");

WHEREAS, the FY 2021 MTW Annual Plan identifies AH's priorities, projects, activities and initiatives for AH's FY 2021 and any policy changes to be implemented during FY 2021;

WHEREAS, AH's FY 2021 MTW Annual Plan is the product of a comprehensive planning process in which AH's Senior Management consulted with AH's Board of Commissioners, resident association leaders, public housing-assisted residents, Housing Choice participants and landlords, AH employees, Atlanta Legal Aid, Georgia Law Center for the Homeless, AH's private sector development partners, members of the Service Provider Network, local political and government officials, various city and state agencies, other stakeholders and members of the public;

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

WHEREAS, the consultation process included a properly advertised and noticed public hearing held on March 5, 2020;

WHEREAS, during FY 2021, AH will continue to advance its real estate initiatives to create more housing opportunities, to advance its human development and self-sufficiency initiatives, and to streamline its service delivery approach and financial protocols;

WHEREAS, AH' s Senior Management consulted with the Board of Commissioners to solicit their input, guidance and direction regarding the proposed projects, activities, initiatives and policy changes that will be implemented during FY 2021, as described in Exhibit OPS- I-A:

WHEREAS, the Amended and Restated Statement of Corporate Policies is the controlling policy document governing the assistance programs administered by AH;

WHEREAS, the Amended and Restated Statement of Corporate Policies is organized into four chapters and captures the Moving to Work Demonstration policy innovations in effect for the AH' s Mixed-Income , Mixed-Finance Communities ("MIXED Communities") , AH-Owned Communities, Housing Choice Tenant-Based Program, HomeFlex Programs (previously known as Project Based Rental Assistance), and HAVEN Supportive Housing Programs (collectively "Rental Assistance Programs"); and

WHEREAS, Senior Management of AH is now recommending that the Board of Commissioners: (i) approve AH's FY 2021 MTW Annual Plan; (ii) authorize the submission of AH's FY 2021 MTW Annual Plan to HUD; (iii) authorize the Chair or the Vice Chair of the Board of Commissioners and AH's President and Chief Executive Officer/Secretary to execute the HUD Certifications of Compliance, attached as Exhibit OPS-1-B; (iv) approve the implementation of the projects, activities, initiatives and any policy changes set forth in the FY 2021 MTW Annual Plan; and (v) approve the adoption and implementation of the Amended and Restated Statement of Corporate Policies as set forth in the FY 2021 MTW Annual Plan;

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

1. AH ' s FY 2021 MTW Annual Plan, including the projects, activities, initiatives and any policy changes that will be implemented during FY 2021 as described in Exhibit OPS- I-A , is hereby approved.
2. Each of the Chair or the Vice Chair of the Board of Commissioners, as required, and the President and Chief Executive Officer/Secretary is hereby authorized to execute Exhibit OPS- 1-B and any other required documents, certifications or United States Department of Housing and Urban Development (HUD) forms related to the approval and filing of AH' s FY 2021 MTW Annual Plan.
3. The Amended and Restated Statement of Corporate Policies, as set forth in AH's FY 2021 MTW Annual Plan, is hereby approved in conjunction with AH's FY 2021 Annual Plan, and AH is hereby authorized to adopt and implement such policies.
4. The President and Chief Executive Officer is authorized to submit AH' s FY 2021 MTW Annual Plan and such other required documents, certifications or forms to HUD with such


changes, additions, corrections or amendments as she shall deem necessary or appropriate or as may be required by HUD.

5. The President and Chief Executive Officer and any person or persons designated and authorized to so act by the President and Chief Executive Officer are hereby authorized to implement the projects, activities, initiatives and any policy changes set forth in the FY 2021 MTW Annual Plan.

ADOPTED, by the Board of Commissioners of The Housing Authority of the City of Atlanta, Georgia and signed in authentication of its passage, 27th day of May 2020.

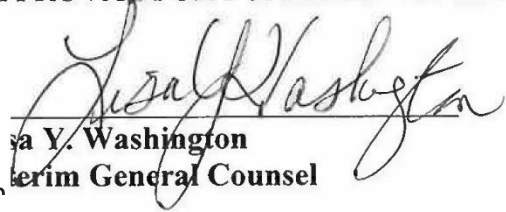
ATTESTED:

APPROVAL:


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


Christopher R. Edwards, M.D.
Chairman

APPROVAL FOR FORM AND LEGAL SUFFICIENCY:


Lisa Y. Washington
Interim General Counsel



ATLANTA HOUSING



Vision Healthy Mixed-Income Communities; Healthy Self-Sufficient Families.

Mission Provide quality affordable housing in amenity-rich, mixed-income communities for the betterment of the community.

Goals

Quality Living Environments Provide quality affordable housing in healthy mixed-income communities with access to excellent quality-of-life amenities.

Self-Sufficiency (a) Facilitate opportunities for families and individuals to build economic capacity and stability that will reduce their dependency on subsidy and help them, ultimately, to become financially independent; (b) facilitate and support initiatives and strategies to support great educational outcomes for children; and (c) facilitate and support initiatives that enable the elderly and persons with disabilities to live independently with enhanced opportunities for aging well and to improve health and wellness for all residents.

Economic Viability Maximize AH's financial soundness and viability to ensure sustainability of its investments and portfolio of properties.

Moving to Work (MTW) Overview



Exclusive designation – **Only 39 MTW PHAs nationwide***

Designation allows Atlanta Housing to modify certain HUD regulations to test innovative housing strategies to solve local housing challenges

MTW Activities** **must meet at least 1** MTW Statutory Objectives

- **Cost effectiveness/efficiency**
- **Give incentives to families with children that are working, enrolled in school/job training, or preparing for work**
- **Increase housing choices**



MTW Planning **requires public presentation** and Board Adoption



*HUD is adding 100 PHAs to a modified MTW Program
**a.k.a., Flexibilities, Initiatives, Innovations, etc.,



Summary of Stakeholder Briefings

Stakeholder Briefings are a **series of meetings** with residents, friends of the agency, AH staff and citizens to gather feedback on planned activities.

FY 2021 Activity Highlights

- Advance Affordable Housing and Sustainable Development
- Move Choice Neighborhood plans forward
- Finalize agreements to add 125 new HomeFlex units
- Convert PH units to Section 8 PBV units under RAD
- Eliminate/reduce the number of interim re-certifications processed
- Administer reduced Work/Program Requirements
- Increase the number of 1st Time Homebuyers assisted
- Strengthen partnerships to improve services under HDS
- Investigate opportunities to co-lead or lead development
- Utilize innovative approaches to financing affordable housing
- Utilize innovative approaches to development and partnerships that enhance communities and support self-sufficiency
- Identify new sources of funding such as Choice Neighborhood Grants, Foundation Grants, and partnerships

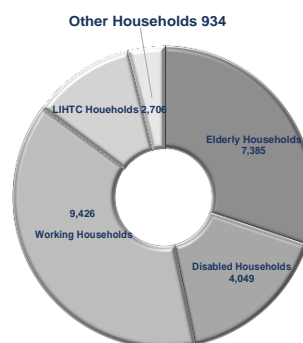


Beneficiaries of AH's Assistance Programs

95% of assisted households **earn less than \$21,550** yearly*

Assisted Working Households **earn less than \$21,128 yearly** or \$10.16/hour**

Assisted Fixed-Income Households **earn less than \$12,072 yearly** or \$1,006/month
Assisted First Time Homebuyers **earn less than \$63,760 yearly** or \$30.68/hour**



24,500
Households Served***

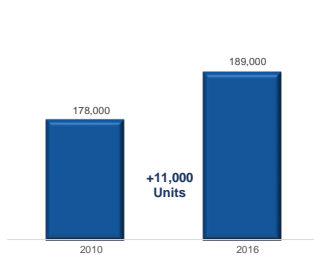
*Based on 3-person household; **Based on 40 hour work week; ***As of December 31, 2019

The Challenge

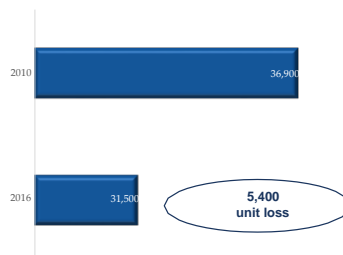


Creating and preserving affordable housing supply in a growing market

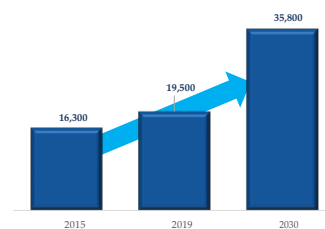
Total Households Added in Atlanta



Units Priced Under \$800/Month



The rental housing gap for households earning less than \$30k is projected to grow by 1,300 units annually



Help offset the affordable housing unit loss circled above, which is about 900 affordable units lost annually.

*Source: City of Atlanta Equitable Housing Assessment (revised 2018)

The Strategy



Collaboration
in a growing
market

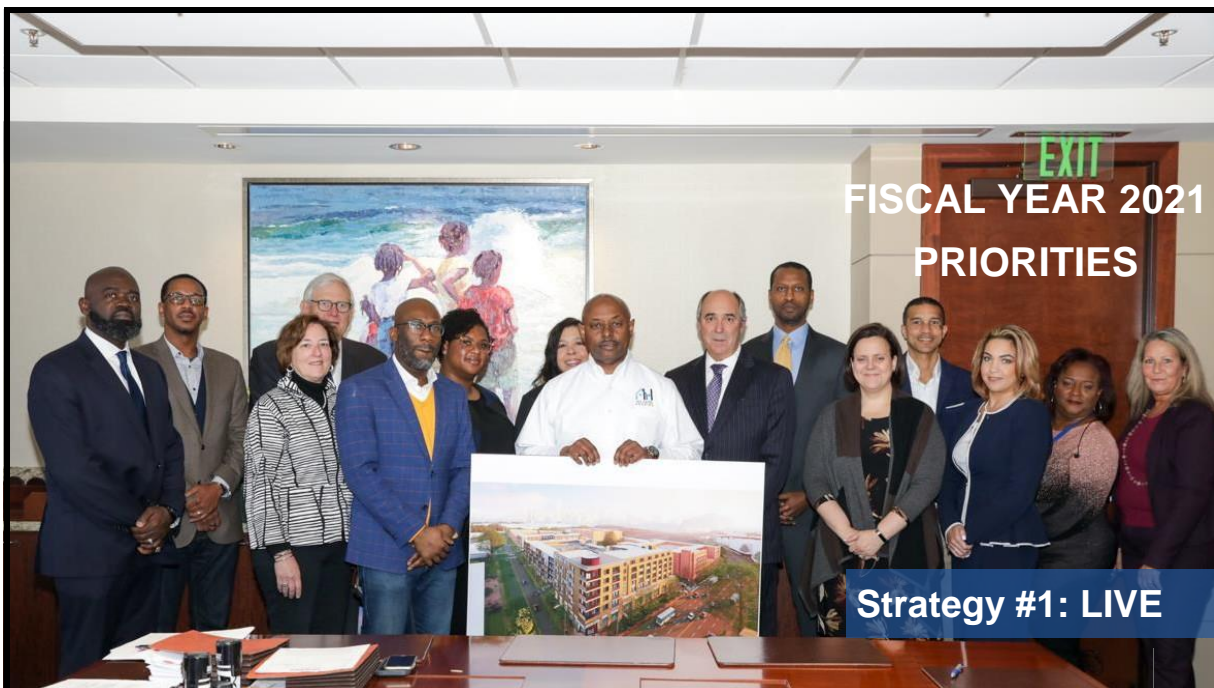


The Plan – Real Estate

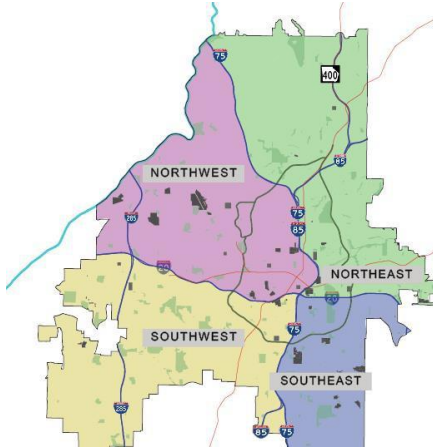


Create and Preserve Affordable Housing to Strengthen Communities and Families

- Increase affordable housing supply in a growing market.
- Advance and complete projects within market sectors:
 - Northeast, Northwest, Southeast, and Southwest
- Focus on offsetting loss of affordable units:
 - Create or preserve affordable units through acquisition, construction, rehabilitation, modernization or conversion through HomeFlex.
 - Exercise MTW Authorizations to manage AH's TDC in the production of affordable housing units.
 - Engage in revenue opportunities utilizing MTW flexibilities to sustain funding for community development.
 - **Add/preserve 180 to 225 units annually.**
- Aggressively utilize **mixed-income, mixed-use** models of **development** with innovation, financing, and sustainable development.
- **Co-develop properties** through alignment of investments, which includes neighborhood revitalization through residential and commercial business ventures.
- **Build capacity** accelerate housing developments with a self-development model.



Projects and Plans by Quadrant



FY 2020 Accomplishments

- Continued activities under current business model while engaging in activities that **build capacity to serve** in other development roles.
- **Created 805 affordable units** through rental and homeownership programs.
- **Preserved 91 affordable units** through subsidy awards.
- **Broke ground on Herndon Square Senior** in December 2019.

Unit count as of December 31, 2019

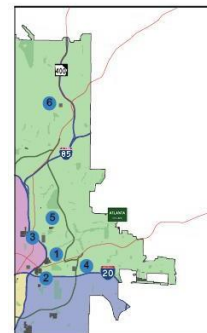
Northeast Quadrant



ABOUT

This quadrant includes the areas east of Georgia Highway 400 and Interstate 75 and north of Interstate 20. Majority of the neighborhoods in this market sector are located in or near areas of opportunity; however, this varies by sub-area. Many neighborhoods are impacted by new market rate investment with appreciating real estate values, increasing rents and a resulting in a limited supply of affordable housing. This leads to the risk of displacement for legacy residents and businesses.

NORTHEAST



- 1 AUBURN POINT
- 2 CAPITAL GATEWAY
- 3 CIVIC CENTER
- 4 MADISON REYNOLDSTOWN
- 5 NORTH AVENUE/U-RESCUE
- 6 BUCKHEAD BUSINESS DISTRICT

Anticipated development activities at key sites during FY 2021.

Madison Reynoldstown



Approximate Total Development Cost



Information

Address: 890 Memorial Drive, SE

Units: Up to 116 total units

- 86 Affordable Units (85%)
- 40%, 60% and 80% AMI
- ±2,700 square feet of retail
- Up to 46 HomeFlex Vouchers

Financial closing: fall 2020

Construction period: January 2021 – June 2020

access to Atlanta Beltline Eastside

Additional details: Immediate

Trail, grocery, pharmacy, MARTA, restaurants and retail all within ¼ mile



North Avenue/U-Rescue



Total Development Cost

Information

Units: Proposed 339 total units

- Approximately 40% affordable units
- ±2,000 square feet of retail

Financial closing: spring 2022

Construction period: FY 2022 – FY 2024

Additional details: Close to Atlanta Beltline, MARTA, Ponce City Market with access to grocery, restaurants and retail within ½ mile and a 18-acre public park nearby



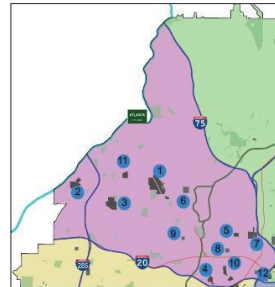
Northwest Quadrant



ABOUT

The Northwest quadrant includes neighborhoods within the boundaries created by Georgia Highway 400 and Interstate 85, north of Interstate 20. The area has been historically disinvested but is experiencing a resurgence of interest and investments in certain subareas. The area is amenity-rich and ripe with the opportunity to preserve naturally occurring affordable housing, prevent displacement of legacy residents and increase affordable housing while revitalizing communities. The area includes the downtown business center, municipal, state and federal government centers, arts and entertainment venues and institutions of higher learning, including the Atlanta University Center (AUC), the largest collective of Historically Black Colleges and Universities (HBCUs) in the country. The City and AH are the recipients of a HUD Choice Neighborhoods Implementation Grant (CNIG) located in the area near the AUC Schools.

NORTHWEST



- 1 WEST HIGHLANDS
- 2 BANKHEAD COURTS
- 3 BOWEN HOMES
- 4 COLLEGETOWN
- 5 HERNDON SQUARE
- 6 JOHNSON ROAD
- 7 PALMER HOUSE
- 8 MAGNOLIA PERIMETER
- 9 SCATTERED SITES
- 10 VILLAS OF HOPE
- 11 SCHOLARS LANDING
- 12 HOLLYWOOD COURTS

Anticipated development activities at key sites during FY 2021.

**Potential Invest Atlanta Co-Investment project.*

Herndon Square

Formerly Herndon Homes



\$125,000,000

Total Development Cost



Information

Address: 500 Northside Drive, NW

Units: Herndon square is a five phase mixed-use, mixed-income development with over 700 new units.

Phase I, Herndon Senior:

- 97 units
- 100% affordable for ages 62 and older

Financial closing: December 2019

Construction period: 16 months

Additional details: Close to the Technology Enterprise Park (TEP), GA TECH, GWCC, mid-town and downtown business districts, arts and entertainment venues, Atlanta Beltline Trail, Northyards, within a ½ mile

West Highlands



Information

Address: Perry Boulevard, NW

Units: West Highlands is a five phase mixed-use, mixed-income revitalization of ± 200 acres.

- ± 700 rental units (completed)
- ± 786 for sale units (SF & THs)

Financial closing: Continues AH disposition of land in remaining homeownership phases

Construction period: FY 2000 - FY 2024

Additional details: Ongoing mixed-income residential construction of AH and developer-owned/controlled parcels

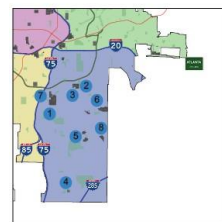
Southeast Quadrant



ABOUT

The southeast quadrant includes neighborhoods south of Interstate 20 and east of Interstate 75. The most northern portion of this sector includes redevelopment of the Chosewood Park area. This area is part of the stable Grant Park and Ormewood Park neighborhoods. This sector does not have a strong commercial base; therefore, AH is working with its development partners and stakeholders to ensure future real estate projects deliver true mixed-use developments with amenity-rich retail opportunities for neighborhood residents.

SOUTHEAST



Anticipated development activities at key sites during FY 2021.

**Potential Invest Atlanta Co-Investment project.*



Englewood I & II

Formerly Englewood Manor



\$40 million public infrastructure;
\$290 million vertical construction*

*Approximate total Development Cost



Information

Address: Englewood Avenue, SE

Units: Mixed-use, mixed-income multifamily, senior and homeownership units

- ±850 units; 30% affordable
- ±50,000 square feet of retail

Financial closing: Public Infrastructure and Phase I Housing FY 2021

Construction period: Multiple phases: FY 2021 – FY 2029

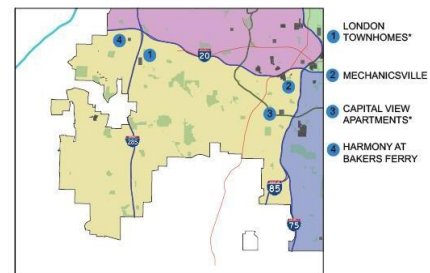
Southwest Quadrant



ABOUT

Located south of Interstate 20 and west of Interstate 75, neighborhoods located in this quadrant are slowly seeing revitalization. A majority of this market is also located in proximity to Atlanta's Hartsfield-Jackson International Airport. With the completion of Tyler Perry Studios in 2019, redevelopment is moving forward at Fort McPherson and the revitalization of numerous blighted areas around the Beltline. These real estate market trends will present opportunities to preserve and create high-quality affordable housing and revitalize communities in the Southwest sector.

SOUTHWEST



Anticipated development activities at key sites during FY 2021.

*Potential Invest Atlanta Co-Investment project.

Capitol View



\$26,000,000

Approximate Total Development Cost



Information

Address: 1191 Metropolitan Parkway, SW

Units: 120 multi-family units

- 40 HomeFlex Vouchers
- 24 HAVEN units (supportive housing)
- <30% to 60% AMI;
- 100% Affordable

Financial closing: Closed January 2020

Construction period: 13 months; complete February 2021

Co-Investment with Invest Atlanta

Additional details: Located on the Atlanta Beltline Westside Trail with immediate access to MARTA and close to Interstates 75 and 85, the downtown business district and registered on the National Historic Registry

London Townhomes



\$38,000,000

Approximate Total Development Cost



Information

Address: 308 Scott Street, SW

Units: 200 rental units on ±17.5 acres

- 90% Affordable
- 150 HomeFlex Vouchers
- <60% AMI @ 60% rents

Financial closing: March 2020

Construction period: April 2020-July 2021

Additional details: Conversion of existing townhome cooperative community with a clubhouse, to mixed-income multifamily development

Choice Atlanta Neighborhood Transformation Initiative



Atlanta Housing and the City of Atlanta received a \$30 million Choice Neighborhood Implementation Grant (CNIG) for the redevelopment of the former University Homes site, now Scholars Landing, and the revitalization of Ashview Heights, Atlanta University Center and Vine City neighborhoods, commonly known as University Choice Neighborhood (UCN).

Housing Plan



Ashley IA Building

Create 506 mixed-income rental and for-sale housing options at Scholars Landing (CNIG doesn't include 100-unit Veranda senior phase).

FY 2020 Accomplishments: Created 135 units – Ashley I A/B phase: 54 HomeFlex/LIHTC, 54 CN Workforce, 27 Market units Assisting Former University Homes (FUH) residents in their return.

FY 2021 Plans: Develop **Ashley IC (66 units)** phase and continue FUH resident re-occupancy assistance; advance **Ashley II** plans and commence development of **212 units**.

Future Revitalization: Create 33 for sale mixed-income townhomes.

Choice Atlanta



Neighborhood Plan

- Acquire/demolish blighted properties
- Facilitate owner-occupied rehab (OOR) façade improvements and home repairs
- Install place-making enhancements or exhibits that commemorate neighborhood history/character

FY 2020 Accomplishments:

- Three OOR home repairs completed/underway and five in process.
- One property acquired and two blighted properties demolished.
- CN historical Interpretive Plan completed.
- Architectural firm procured and site design being finalized for Roosevelt Hall renovation.

FY 2021 Plans: Renovate Roosevelt Hall, install place-making enhancements along Atlanta Student Movement Blvd., continue OOR improvements and historical preservation projects.

Choice Atlanta

People Plan



Supportive Service Delivery

- Career training and job placement
- Health resource connections
- Student academic support and wrap around services
- FUH resident re-occupancy assistance (Scholars Landing)
 - *Priority assistance to FUH residents, then to Scholars Landing and UCN residents*
- **Microgrants** to neighborhood-serving organizations
- **Scholarship awards** to college-bound high school seniors

FY 2020 Accomplishments: Nine Section 3 hires, \$50,000 in microgrants and \$20,000 in scholarships disbursed; 25 FUH youth enrolled in after-school tutoring; 37 FUH residents moved to Ashley I A/B phase.

FY 2021 Plans: Continue supportive service delivery and microgrant and scholarship awards.

HomeFlex

AH's MTW Project-Based Rental Assistance Program



Utilizing MTW Authorizations, AH created HomeFlex, a project-based rental assistance program* that supports ongoing activities that create or preserve affordable housing units for eligible families at contracted multi-family properties. Under this program, **AH has created or preserved > 5,900 units** that increase affordable housing choices for eligible families, while maximizing Housing Choice Voucher (HCV) resources.

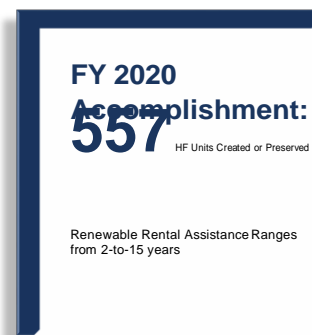
There are 3 types of HomeFlex:

Standard HomeFlex: designated for multi-family units in AH-owned, mixed and privately owned communities, buildings and communities that house residents 55 and older.

HomeFlex for Older and Senior Persons: designated for

HomeFlex for Supportive Housing or HAVEN: designated for property owners/developers that agree to provide housing and wrap around services for residents.

*Project-based assistance remains with the unit for the next eligible family to receive at the property.



HomeFlex



Fiscal Year 2021 Plans

- Continue to develop an AH-friendly supplemental funding stream designed to help property owners, especially smaller portfolio owners, with achieving the Uniform Federal Accessibility Standards (UFAS) compliance requirement.
- Design and implement an alternative funding structure to allow AH to engage in HomeFlex projects at different points and/or in different roles.
- Preliminary supplemental funding streams for consideration, include a low-interest loan or other eligible other funding vehicles that help maintain or increase the affordable housing stock level.
- To preserve affordability, acquire existing HomeFlex properties from owners that plan to sell their property or exit the HomeFlex Program as able.
- Issue HomeFlex NOFAs seeking applications from interested owners/developers, as well as, continue to create a flexible and streamlined alternative process for the selection of unsolicited HomeFlex proposals.

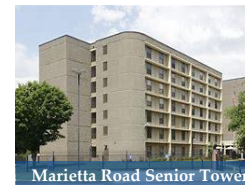
125
New HomeFlex
Units Planned

Public Housing and RAD

AH-Owned Facilities and Mixed Communities



Under the Rental Assistance Demonstration (RAD) Program, AH is approved to convert units from public housing assisted to long-term Section 8 assisted units*. Through this conversion, the converted properties can take on debt, which allows for the preservation of affordable housing.



Marietta Road Senior Tower

FY 2020 Accomplishment:

Converted 402 units from PH to PBV, thereby preserving affordability:
91 at Villages at East Lake I,
180 at Villages at East Lake II, and
129 at Marietta Road Senior Tower.



Villages at East Lake

24 CHAP requests planned for FY 2021 – FY 2023:
9 AH-owned high-rises and
15 Mixed Communities

*AH elected to convert PH units to PBV units.

PH Housing and RAD Conversions



FY 2021 Conversion and Rehabilitation Plans

AH plans to continue NSPIRE 14-day inspection on **100% of its units**. This action will increase AH-owned unit quality and promote reinvestment into the property year round by reducing inspection preparation costs.

Some properties may convert under a **subsidy only conversion**; other properties may undergo **substantial rehabilitation or significant modernization** to meet RAD requirements.

AH **may commit** up to 20% of turnover TBVs in FY 2021 for eligible RAD families wishing to exercise their mobility.

- **Remaining** turnover TBVs are for the **HCV Waiting List**.
- The alternative Choice Mobility option limits the commitment of turnover TBVs for RAD families to 75%.

PIC ID	Community	Housing Type*	Unit Count
GA 006000530	Hightower Manor <i>Planned Rehabilitation</i>	NE; E; Non-E/D	129
GA 006000540	Barge Road <i>Planned Rehabilitation</i>	NE; E; Non-E/D	129
GA 006000800	Villages @ Castleberry II <i>Planned Rehabilitation</i>	MI Family	114
GA 006000810	Columbia Village <i>Planned Rehabilitation</i>	MI Family	30
Totals:		4	402

*NE = Near Elderly (55-61); E = Elderly (62+); Non-E/D = Non-Elderly Disabled; MI = Mixed-Income

Housing Choice Voucher Program



AH's Tenant-Based Assistance Program

AH's HCV Program helps low-income families afford units in a highly competitive real estate market. Population increases and minimal affordable housing developments make it difficult for low-income families to find affordable, appropriately-sized units. Without this rental assistance, these families are faced with the bleak prospect of choosing between substandard housing or living in higher-priced housing.

APPROXIMATELY

11,000

FAMILIES SERVED
ANNUALLY

FY 2020 Accomplishment:

- Conducted **over 3,500 intakes**
- Housed **over 1,500 new families**
- Managed **waiting list of over 25,000** applicants
- **Performed over 25,000 inspections** to ensure unit safety and compliance with Housing Quality Standards (HQS)
- Provided **nearly 1,000 families** the opportunity to requalify for the HCVP because of the new Work Requirement hours

Housing Choice Voucher Program

AH's Tenant-Based Assistance Program



- **Increase the Special Program Vouchers for Homeless Students by 100%**, from 50 to 100, to accommodate referrals received from APS.
- Significantly **reduce the number of Enhanced HQS Inspections** 25% to free up time to assist landlord partners with recurring challenges.
- **Reduce HCVP's duplicative workload** in order to spend more time ensuring the continued eligibility of nearly 11,000 existing program participants and the processing of approximately 290 new program participants each month.
- **Monitor changes in the Work/Program Requirement** to evaluate the activity's performance and identify and address unintended consequences on program participant or AH.
- Work closely with state officials to **house youth aging out of foster care**. Primary housing mechanism includes FUP Youth vouchers.



Homeownership Assistance



Down payment assistance (DPA) is an effective tool to help make the dream of homeownership a reality for low and moderate-income families. Because of Atlanta's current affordability crisis, Atlanta Housing deems this tool important to maintain affordable opportunities, especially in areas where real estate values are escalating. AH's DPA can be combined (layered) with other down payment assistance to maximize affordability.

FY 2020

Accomplishment:

- **Increased** number of First-Time Homebuyers
- Assisted families with **homeownership**
- 200 First Time Homeowners
- **Over 25%** are Priority Families
- **14%** education families
- **9%** healthcare families
- **5%** public safety families

Homeownership Assistance



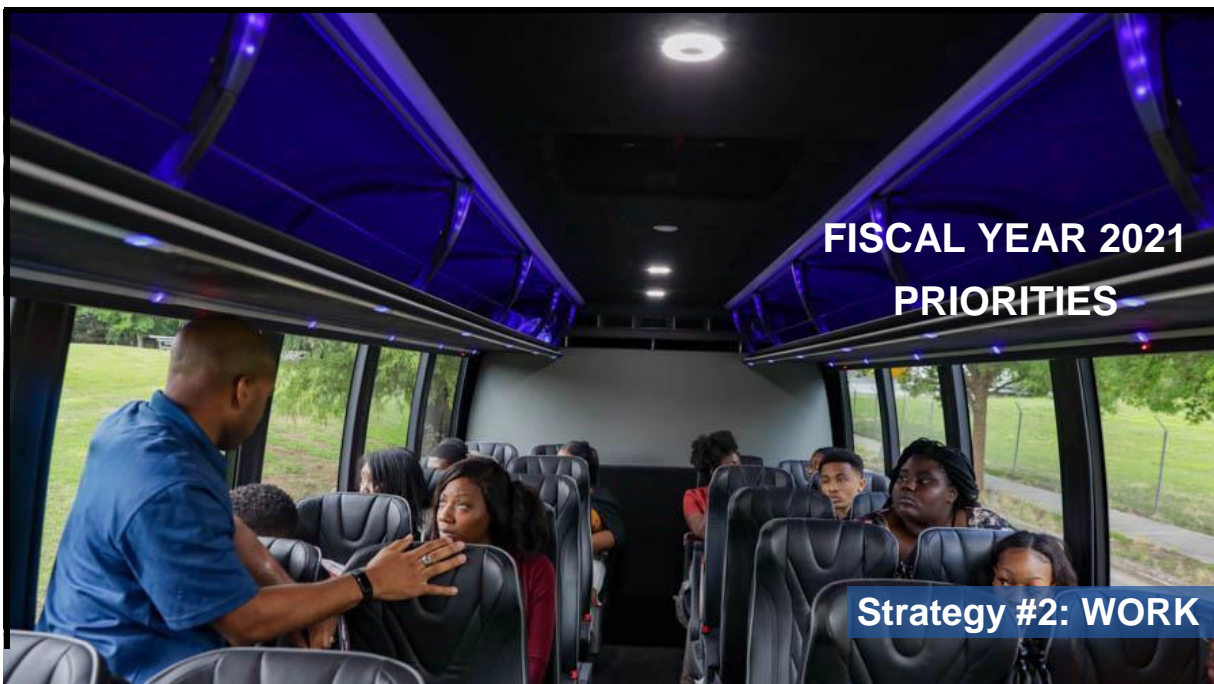
FY 2021 Plans:

- Review program requirements and adjust policy and procedures to move in-line with or **remain current with market needs**.
- Continue targeting DPA for **homeownership units at West Highlands** and other Mixed Communities as funding permits.
- Continue to focus on eligible buyers citywide, including giving a higher level of **assistance to AH-assisted families, qualified professionals and para-professionals** in education, public safety and healthcare.
- Investigate the feasibility of **assistance for homes received through non-profit/government entities** such as Project Shield.

DPA GOAL:

300

FAMILIES ASSISTED



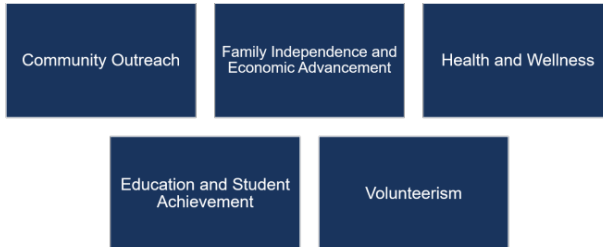
External Affairs & Human Development Services

Services to Assist Families



AH's Service Delivery Model

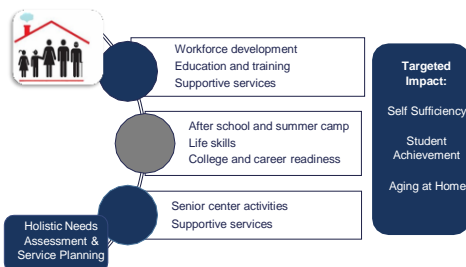
RESPONSIVE. EFFICIENT. IMPACTFUL.



Human Development Services



Service Delivery Model



Priorities

1. Family independence
2. Youth advancement
3. Senior services



HAVEN

Supportive Housing

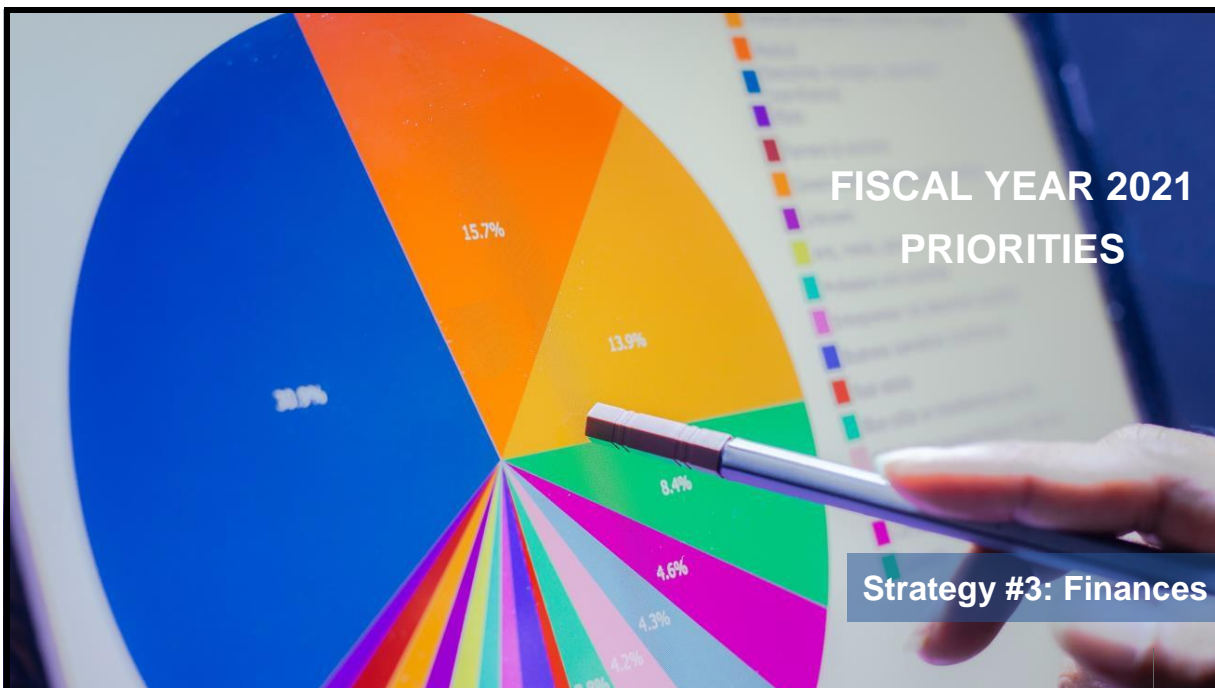


AH provides **more than 600 units** for supportive housing **through** the administration of **HomeFlex** and dedicates **more than 1,200 vouchers** for various supportive housing initiatives **through** the administration of **Housing Choice**. Both efforts focus on housing disabled families or homeless families.

AH plans to:

- Recruit new partners and strengthen existing partnerships that **create or preserve permanent supportive housing (PSH) units** citywide.
- Collect and monitor data for **short-term assistance programs for performance** analysis.

Goal: Add
five partners
or five units



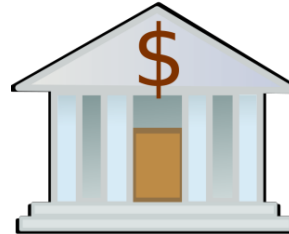
Gap Assistance Financing Fund

Co-Investment and Financing Affordable Housing



AH introduced this concept as part of its Co-Investment Strategy to increase the supply of AH-owned, mixed-finance, and privately-owned local, non-traditional housing units that may include:

- Issuing **construction loans** (up to 5-years)
- Providing **short-term gap financing** to make a project work
- Entering into **investment deals** with Invest Atlanta and other development partners



Local Blended Subsidy Tool

Increasing affordable Housing in a Competitive Housing Market



AH introduced this approach to fund construction and subsidize affordable multi-family assisted housing and may:

- Initiate **development, as feasible**, under the AH "Faircloth Limit", utilizing Section 9* funding, adding such units to its Annual Contributions Contract (ACC)
- Blend subsidies to **fund assisted unit projects on AH-owned land** or create affordable units in acquired buildings.
- **Convert created Section 9 units to Section 8* assisted PBV units** post construction under RAD.

*Section 8 funds are HUD funds provided for Housing Choice and Section 9 funds are HUD funds provided for public housing. AH's MTW agreement allows for combining them for any purpose eligible under the agreement and as approved in the annual plan.



Self-Development

Enhancing Role in Development, Management and Ownership

AH proposes to continue to increase its self-development and management capacity over the next three years for:

- **More control** over timelines and schedules to include what will be built and financed.
- **Opportunity to earn revenues** by assuming greater roles in project management and project development or entering into commercial business ventures.
- **AH's in-house development and management capacity to accelerate development** of affordable housing.



SBE and Section 3

Enhancing Role in Development, Management and Ownership

AH continues to encourage AH contractors to contribute to a training fund to provide direct training

to AH-assisted residents. AH then links those residents to construction, rehabilitation, modernization partners, contractors, and sub-contractors with capable Section 3 and certified Minority, Women, and Small Business Enterprise (MBE/WBE/SBE) business partners.

AH proposes to develop a strategy to incubate Section 3 businesses.



MTW Q & A

Public Comment Period

Public Hearing is **March 5, 2020 6 p.m. – 8 p.m.**

Atlanta Housing's **Pecan Room**, 230 John Wesley Dobbs Avenue

Please use one of the following methods to share your comments:

Email: strategy@atlantahousing.org

MTW Message Line: 404.817.7458

You may review the MTW Plan in its entirety at: www.atlantahousing.org/news

CERTIFICATIONS OF COMPLIANCE

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

OFFICE OF PUBLIC AND INDIAN HOUSING

Certifications of Compliance with Regulations:

Board Resolution to Accompany the Annual Moving to Work Plan

Acting on behalf of the Board of Commissioners of the Moving to Work Public Housing Agency (MTW PHA) listed below, as its Chairman or other authorized MTW PHA official if there is no Board of Commissioners, I approve the submission of the Annual Moving to Work Plan for the MTW PHA Plan Year beginning **(07/01/2020)**, hereinafter referred to as "the Plan", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:

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

- (12) The MTW PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.
- (13) The MTW PHA will comply with requirements with regard to compliance with restrictions on lobbying required by 24 CFR Part 87, together with disclosure forms if required by this Part, and with restrictions on payments to influence Federal Transactions, in accordance with the Byrd Amendment and implementing regulations at 49 CFR Part 24.
- (14) The MTW PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.
- (15) The MTW PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
- (16) The MTW PHA will provide HUD or the responsible entity any documentation needed to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58. Regardless of who acts as the responsible entity, the MTW PHA will maintain documentation that verifies compliance with environmental requirements pursuant to 24 Part 58 and 24 CFR Part 50 and will make this documentation available to HUD upon its request.
- (17) With respect to public housing and applicable local, non-traditional development the MTW PHA will comply with Davis-Bacon or HUD determined wage rate requirements under section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
- (18) The MTW PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.
- (19) The MTW PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.
- (20) The MTW PHA will comply with the policies, guidelines, and requirements of OMB Circular No. A-87 (Cost Principles for State, Local and Indian Tribal Governments) and 24 CFR Part 200.
- (21) The MTW PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the Moving to Work Agreement and Statement of Authorizations and included in its Plan.
- (22) All attachments to the Plan have been and will continue to be available at all times and all locations that the Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the MTW PHA in its Plan and will continue to be made available at least at the primary business office of the MTW PHA.

MTW PHA NAME

MTW PHA NUMBER/HA CODE

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

Christopher R. Edwards, M.D.

Chair, Board of Commissioners

NAME OF AUTHORIZED OFFICIAL

TITLE

SIGNATURE

May 27, 2020

DATE

*** Must be signed by either the Chairman or Secretary of the Board of the MTW PHA's legislative body. This certification cannot be signed by an employee unless authorized by the MTW PHA Board to do so. If this document is not signed by the Chairman or Secretary, documentation such as the by-laws or authorizing board resolution must accompany this certification.**

LOBBYING DISCLOSURES

Certification of Payments to Influence Federal Transactions

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

Applicant Name

For Housing Authority of the City of Atlanta, Georgia

Program/Activity Receiving Federal Grant/Funding

Moving to Work Demonstration Program

The undersigned certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, Disclosure Form to Report Lobbying, in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by Section 1352, Title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

I hereby certify that all the information stated herein, as well as any information provided in the accompanying 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, 1012, 1342; 31 U.S.C. 3729, 3802)

Name of Authorized Official

Eugene Jones, Jr.

Title

President and Chief Executive Officer

Signature



Date (mm/dd/yyyy)

04/15/2020

Previous edition is obsolete

Form HUD-50071 (4/99)
ref: handbooks 7417.1, 7475.10, 7485.1 & 7485.2

DOCUMENTATION OF PUBLIC PROCESS

Atlanta Housing held a series of Public Meetings and a Public Hearing from February 9, 2020 through March 10, 2020 that focused on its Fiscal Year 2021 Moving to Work (MTW) Annual Plan (The Plan) and proposed policy changes. AH's Plan is the product of an inclusive annual planning process involving consultation with AH-assisted families across all programs, strategic partners, service providers, local community members and housing advocacy organizations, state and local agencies, elected and public officials, AH staff, executive leadership, and AH's Board of Commissioners.

Notification of The Plan, its availability and the Public Hearing was communicated via public notices posted in AH-owned facilities and on AH's website, via electronic mail correspondences to AH Stakeholders, and via local and social media outlets. Additionally, to address the diversity of AH residents in AH-owned communities AH translated and posted the Public Hearing notice in Chinese, Korean, Russian, and Spanish. Public Notices appeared in the following local media publications on the dates specified below:

The Atlanta Journal-Constitution

February 20, 2020

March 1, 2020

Mundo Hispanico

February 20, 2020

March 1, 2020

Fulton Daily Report

February 20, 2020

The Plan was made available for review at AH's corporate offices, two satellite offices, AH-Owned Communities, and electronically via AH's website. In addition, AH sent The Plan or presentation materials electronically to organizations by request. Comments on The Plan could be submitted in-person at the Stakeholders Briefing or the Public Hearing; in writing (hand-delivered or via U.S. mail to AH's corporate office); electronically via fax, the website, or email; or by phone on a dedicated voice mailbox.

AH conducted Stakeholders Briefings from February 4 to March 12, 2020 reasonably assuring ample presentation time with each Stakeholders Group. The table on the next page captures the dates of AH's Public Meetings and its Public Hearing regarding its FY 2021 MTW Annual Plan.

AH's 2021 PUBLIC MEETING / PUBLIC HEARING SESSIONS				
Meeting / Hearing Date	Stakeholder Group	Public Attendees	Staff Attendees	Total Attendees
Tuesday, February 4, 2020	Jurisdiction-Wide Council (JWC) - Presidents of Resident Councils	10	6	16
Tuesday, February 4, 2020	<i>Columbia Residential, Integral Development, The Michaels Group: Property-Management Developers (PMDs) and HomeFlex Partners</i>	8	12	61
Friday, February 14, 2020		7	15	
Friday, March 6, 2020		8	11	
Tuesday, February 11, 2020	Affordable Housing Advocates and Community Organizations	0	4	4
Thursday, February 20, 2020	Research and Academia Partners	0	4	9
	Legal Advocates	5		
Thursday, February 20, 2020	Real Estate Sub-Cabinet and Choice Neighborhoods (CN)	2	7	9
Tuesday, February 25, 2020	HDS Service Providers and CN Advisory Committee	3	6	9
Thursday, February 27, 2020	Public Officials (Local, State, Federal)	4	21	29
	HUD Officials (Local Field Office)	4		
Thursday, February 27, 2020	Landlord Advisory Group	13	11	24
Thursday, March 5, 2020	Public Hearing*	9	27	36
Thursday, March 12, 2020	Atlanta Continuum of Care	42	3	45
Thursday, March 12, 2020	Business and Philanthropic Communities	8	13	21
Total Public Meetings and Attendee Counts:	13	123	140	263

**AH provided sign-language interpretation and reasonable accommodation for hearing and visually impaired attendees as requested.*

AH's held its Public Comment and Review Period of its Proposed FY 2021 MTW Annual Plan from February 9 to March 10, 2020. AH considered all comments and suggestions received by March 13 and incorporated them, as applicable, into the final version of The Plan submitted to the AH Board of Commissioners. The table on the following pages capture received comments and AH's action/response to the comments.

AH's 2021 PUBLIC MEETING / PUBLIC HEARING SESSIONS

Meeting / Hearing Date	Stakeholder Group	Public Comment	Response / Action
Tuesday, February 4, 2020	Jurisdiction-Wide Council (JWC) - Presidents of Resident Councils	No comments or call to action received.	Atlanta Housing (AH) looks forward to working with the JWC and AH residents and clients.
Tuesday, February 4, 2020	<i>Columbia Residential, Integral Development, The Michaels Group: Property-Management Developers (PMDs) and HomeFlex Partners</i>	No comments or call to action received.	AH continues to value collaborative efforts and thanks its PMD partners for their assistance.
Friday, February 14, 2020			
Friday, March 6, 2020			
Tuesday, February 11, 2020	Affordable Housing Advocates and Community Organizations	No comments or call to action received.	N/A
Thursday, February 20, 2020	Research and Academia Partners and Legal Advocates	How many families are able to rent with AH Submarket Payment Standards?	All of AH-assisted families are able to rent in any of the 23 (expanded from 7) submarkets of their choice. AH established the submarkets to be more in align with the Atlanta rental market. AH collects and reports this information in its end-of-year reports and other documents.
		Are services [offered by AH] open to all consumers? Are [offered] services onsite?	AH utilizes third-party, non-profit entities to provide services for referred AH-assisted families. Although service providers hold slots for AH, many service providers target a specific population group and services are usually on a first come, first served basis. Some service providers service delivery model is mobile and they visit AH sites on regular intervals.

AH's 2021 PUBLIC MEETING / PUBLIC HEARING SESSIONS

Meeting / Hearing Date	Stakeholder Group	Public Comment	Response / Action
Thursday, February 20, 2020	Research and Academia Partners and Legal Advocates	How are services learned about [by program participants]?	AH conducts [program] orientation briefings and program move meetings for new and existing program participants. At these program meetings, AH distributes literature and verbally discusses known services. Further, AH would surmise that a fair amount of participants are reminded of or learn of offered services from staff referrals because participants expressed a need.
		What will residents do if they lose their job if interims are eliminated?	AH maintains a Hardship Policy, so participants that lose their job or experience other hardships may submit a written request for panel consideration. It is important to understand AH's elimination of interim examinations is consistent with: 1) industry trending, 2) efficient use of Federal dollars by reducing it duplicative workloads and efforts, and 3) preparing families for life after rental assistance. In addition, over one-third of AH's workload is conducting interims for new admissions and annual examinations for families that AH recently approved. Therefore, AH desires increase productivity and eliminate/reduce the 'gaming' element associated with interim examinations.

AH's 2021 PUBLIC MEETING / PUBLIC HEARING SESSIONS

Meeting / Hearing Date	Stakeholder Group	Public Comment	Response / Action
Thursday, February 20, 2020	Real Estate Sub-Cabinet and Choice Neighborhoods (CN)	Do you [AH] follow up with PMDs to ensure compliance?	AH's current structure is designed to help program participants be accountable as they move closer to economic independence and housing self-sufficiency. Therefore, AH relies on self-reporting by program participants and tracking and survey instruments used by PMDs. AH also engages property owner partners (landlords) through listening tours, Landlord Advisory Group, and other mediums to ensure program compliance.
		What are you [AH] doing for older/senior adults under Choice?	Utilizing the Choice Neighborhood Implementation Grant, AH continues to pursue innovative solutions for our senior residents. AH designates a fairly large percentage of new units for our near-elderly (55 years old) and senior residents (62+) utilizing AH's HomeFlex subsidy. Also, under Choice, AH issues Owner-Occupied Rehabilitation (OOR) Grants to help older participants rehab their homes (inside and outside).

AH's 2021 PUBLIC MEETING / PUBLIC HEARING SESSIONS			
Meeting / Hearing Date	Stakeholder Group	Public Comment	Response / Action
Thursday, February 20, 2020	Real Estate Sub-Cabinet and Choice Neighborhoods (CN)	What specific benefits/services is AH providing for older/senior adults?	AH provides a variety of benefits/services specifically for our older and disabled participants. AH identifies a fair number of annual and planned events in the 2021 MTW Annual Plan under the Community, External, and Governmental Affairs narrative for this population group. A few examples of benefits and services include, exclusion from many policy changes, such as minimum rent and earned income disregard for the disabled households that have to (or decide to) return to the workforce, also this group is eligible for triennial examinations for continued rental assistance and the Senior Farmer's Market.
		What is [the] DPA amount?	First, DPA is AH's Down Payment Assistance Program that provides up to \$20,000 for eligible homebuyers. AH's DPA can be layered with other DPA Programs, as applicable, to make homeownership more affordable. A select group is eligible for an additional \$5,000 that makes their maximum amount \$25,000.
Tuesday, February 25, 2020	HDS Service Providers and CN Advisory Committee	What is the Faircloth Limit?	The "Faircloth Limit" is a cap on the number of new Public Housing (PH) units that AH may construct and add to its Annual Contributions Contract (ACC). The cap is adjusted for transfers, consolidations, and RAD removals.

AH's 2021 PUBLIC MEETING / PUBLIC HEARING SESSIONS

Meeting / Hearing Date	Stakeholder Group	Public Comment	Response / Action
Tuesday, February 25, 2020	HDS Service Providers and CN Advisory Committee	Is [new PH unit] money for new construction or rehabilitation?	Any funding received by AH for new PH units would be applicable to AH-owned sites and for new construction only. AH's FY 2021 Plan addresses pursuing other funding sources that may or may not be restricted.
		How far is AH from [its Faircloth] Limit? Is it (Faircloth Limit) modified annually?	As of January 1, 2020, AH's Faircloth Limit was 12,885 PH units with 3,741 existing PH Annual Contributions Contract (ACC) units. h Limit. Therefore, AH can add 9,144 PH units under the Limit. The Faircloth Limit is updated annually to account for newly completed units and PH units converted to PBV units under RAD. AH's FY 2021 MTW Plan includes the us of additional HUD Capital and Operating Funds under its Local Blended Subsidy Program to create new PH units. AH's existing PH units plus any new PH units cannot exceed AH's Faircloth Limit.
Thursday, February 27, 2020	Public and HUD Officials	First thank you for including the continuation of the Choice and English Avenue Notice of Funding Availability (NOFA). We are seeing so much development in the neighborhoods that having a mechanism to attract project-based vouchers (PBVs) remains a critical tool for achieving long-term affordability.	AH values collaborative efforts and appreciates the acknowledgement shared. Without such collaborations, AH is unable to carry out its mission, meet MTW Statutory Objectives, and actively explore avenues that allow AH to operate at a high level.

AH's 2021 PUBLIC MEETING / PUBLIC HEARING SESSIONS

Meeting / Hearing Date	Stakeholder Group	Public Comment	Response / Action
Thursday, February 27, 2020	Public and HUD Officials	Building upon the recent Westside Future Fund (WFF) request for proposal (RFP) for HomeFlex supported single-family rental, I think [that] it would be helpful to continue thinking through the best ways to implement project-based single-family homes . . . in the Northwest and Southwest [parts of the city] . . . WFF would be pleased to be the 'guinea pig' for exploring how to implement these contracts in a way that is efficient and supports families who need these homes.	AH continually searches for opportunities to collaborate that are win-win-win, for low-income families, for AH, and for AH partners. AH acknowledges that single-family homes offer a viable housing solution and appreciates WFF's willingness to serve as the 'guinea pig'. AH will be in contact with you after we investigate how other PHAs accomplished this benefit and we begin to design our own program for local implementation of project-based assistance for single-family homes.
		Along those same lines, I am aware that the PHA in Louisville, KY has been using single-family PBVs to facilitate homeownership. WFF is keenly interested in figuring out how to do this on the Westside, and by the end of 2020 [WFF] should have more than 20 homes that will be a combination of for rent, for sale, and lease-to-own. [WFF] would love to work with [AH] on structuring a pilot lease-to-own HomeFlex Program.	Louisville has a Section 8 Homeownership Program whereby voucher-holding families are able to use their voucher to purchase a home. AH had a similar program, 2000 - 2004, that was not successful because of poor acceptance in the lending community, voucher-holding families at 30% or less of AMI were unprepared to take on long-term costs, and the need for AH to encumber funds for the duration of the loan. AH is unaware of any programs related to PBVs. Nevertheless, AH welcomes further discussion with WFF and others to find ways to keep legacy residents in their neighborhood through various homeownership vehicles.

AH's 2021 PUBLIC MEETING / PUBLIC HEARING SESSIONS

Meeting / Hearing Date	Stakeholder Group	Public Comment	Response / Action
Thursday, February 27, 2020	Public and HUD Officials	<p>I note that AH is continuing its Special Program Voucher for Homeless Students (SPVHS) with an allocation of 50 HCVs - thank you! I would strongly urge you to consider increasing the number of vouchers available, if at all possible, and to continue working proactively with organizations like Raising Expectations and the Atlanta Volunteer Lawyers to get these vouchers to families who are facing imminent eviction and displacement . . . We continue to see 60%+ student mobility rates in the Washington cluster, which is being driven by rental increases that families simply cannot afford. Keeping or getting families in secure housing remains a huge lift that SPVHS can go a long way to helping.</p>	<p>AH thanks you for your support and is excited by the success of this program. Therefore, AH increases the number of vouchers from 50 to 100 in the 2021 MTW Plan. AH realizes that this is a small measure when contrasted with the need for this population group, but remains anxious to collaborate with others to explore win-win-win solutions.</p>

AH's 2021 PUBLIC MEETING / PUBLIC HEARING SESSIONS

Meeting / Hearing Date	Stakeholder Group	Public Comment	Response / Action
Thursday, February 27, 2020	Landlord Advisory Group	How is the new ordinance that was proposed by Atlanta City Council in regards to the requiring landlords to accept vouchers going to effect the agency?	First, AH is pleased with the efforts demonstrated by the proposed new ordinance and although it is not law yet, it does begin the needed conversation. Further, [AH] is supportive of initiatives and legislation designed to expand the acceptance of rental assistance payments or vouchers. Short of lobbying [AH] actively works with the city to expand the "choice" in housing choice. Currently, our program participants do not have true choices. Participants are limited to living in areas where landlords are willing to accept vouchers. In response, [AH] has designed programs within the guidelines of Federal funding of the Housing Choice Program to create submarkets within the city to expand participant choices that include desirable neighborhoods, which are addressed in the ordinance as well. So AH stands ready to meet the challenge, but reminds everyone that there are a fixed number of vouchers and corresponding dollars that only get us so far.
		As related to the homeless student program, is AH trying to place [families] in clusters near the technical schools or place [families] in one offs wherever housing is available?	AH's focus with APS Vouchers is to help stabilize families in appropriate-sized, affordable housing in their existing school. The availability of units plays a large part in that strategy, so there are times when families must consider transferring schools in order to utilize the voucher.

AH's 2021 PUBLIC MEETING / PUBLIC HEARING SESSIONS

Meeting / Hearing Date	Stakeholder Group	Public Comment	Response / Action
Thursday, February 27, 2020	Landlord Advisory Group	[For] 18 [year old] or older student out of high school that are aging out of foster [care], will there be a social program that they have access to training while they are awaiting housing?	Students or young adults aging out of foster care would continue to receive services and case management under DFCS' Connected by 21 (CB21) Program. Once the young adult ages out of these services from DFCS, then they are referred to service providers contracted by AH. Should there be more specific services tailored for this population that may involve psychological help, then the short answer is that AH's programs are fluid and AH is open to all options to strengthen and improve offered services for its program participants.
		There are several duplexes, triplexes, etc. that are zoned R4 that are going through code revision. Is there any possibility that AH can speak on behalf of the owners that there should be a simpler way?	AH understands that the city's Planning Department is very supportive in bringing back the 4-plex, triplex, and other efforts to make it easier for both homeowners and developers to be able to build those types of structures again. In sharing this information with City planning bodies, AH needs to understand the specific impact to landlords and the desired outcome. AH's Real Estate Planning and Development team will reach out to the Housing Choice team to determine the next steps to continue this discussion.

AH's 2021 PUBLIC MEETING / PUBLIC HEARING SESSIONS

Meeting / Hearing Date	Stakeholder Group	Public Comment	Response / Action
Thursday, March 5, 2020	Public Hearing	This is not a question, but a request for seniors to be treated fairly - put [seniors] in a special category so that [seniors] are able to move back into their neighborhoods, their home base.	AH feels that it treats all of its residents fairly. However, if you feel that you are being treated unfairly, please use any of the many channels offered by AH to share your experience. With regard to placing seniors in a special category, AH already extends a number of exemptions and considerations to its senior and disabled populations that are not offered to non-elderly, non-disabled participants. For example, AH gives elderly and disabled participants, the first right of refusal on unit assignments and first right to return after substantial rehabilitation or significant modernization work. Unfortunately, because of rehabilitation and modernization strategies and techniques utilized to maximize effectiveness and efficiency, participants are unit 'right-sized' by family size and mobility need. Often, the offered units are located on different floors or at different sites making it very difficult for AH to return participants to their same unit or neighborhood.

AH's 2021 PUBLIC MEETING / PUBLIC HEARING SESSIONS

Meeting / Hearing Date	Stakeholder Group	Public Comment	Response / Action
Thursday, March 5, 2020	Public Hearing	Is there a policy for entrepreneurs in housing or can you work on [a] policy [that is] based on income for entrepreneurs or restructure [the current] policy for entrepreneurs with children?	AH's current rent calculation structure is solely income-based. This structure type is best for all scenarios, as rent is calculated based on household income. Since AH's work requirement does not distinguish between types of employment, whether employed or self-employed, the income-based calculation method is best for all income types. Therefore, AH feels that the calculation method is ideal for budding entrepreneurs, first time workers, workers returning to the workforce after a period of unemployment, and workers progressing in their chosen occupation. AH encourages its participants to utilize their talents and engage in self-employment activities if it is right for them. In the meantime, AH will use FY 2021 to review its rent calculation method.
Thursday, March 12, 2020	Atlanta Continuum of Care (CoC)	No comments or call to action received.	AH continues to value collaborative efforts and thanks the CoC members for their assistance.
Thursday, March 12, 2020	Business and Philanthropic Communities	What is the difference between HomeFlex units and portable vouchers?	The primary difference between HomeFlex units and Tenant-Based Vouchers (TBVs) is the portability component, where HomeFlex assistance remains with the unit and makes the unit affordable for the next eligible family and TBVs 'follow' the family nationwide.

AH's 2021 PUBLIC MEETING / PUBLIC HEARING SESSIONS			
Meeting / Hearing Date	Stakeholder Group	Public Comment	Response / Action
Thursday, March 12, 2020	Business and Philanthropic Communities	How long is the HomeFlex obligation? What happens to the residents [once the contract expires]?	HomeFlex Agreement periods vary, but terms usually range from 2 to 20 years. When property owners decide to terminate their agreement at the end of the contract, affected residents are offered comparable housing solutions based continued eligibility. Housing solutions may include issuance of a TBV to assist eligible families in finding replacement housing.
		What is AH's inspection protocol now?	Currently, AH conducts Housing Quality Standards (HQS) inspections annually and plans to use FY 2021 to assess the feasibility of moving to a biennial inspection schedule. A move to biennial inspections may reduce workloads and permit HQS inspectors to dedicate more time with property owners with ongoing challenges.
		Does AH provide underwriting and servicing?	AH does provides limited, in-house underwriting and servicing for its DPA Program and other forgivable loan products. Currently, AH does not provide any external underwriting or servicing activities beyond existing loan products.
Total Public Meetings:	13		

PLANNED AND ONGOING EVALUATIONS

AH is steadfastly concerned with the performance of its MTW Activities and whether these activities should continue, be modified, or be closed out to remain current and relevant to the needs of program participants, the agency, and the community.

AH has a long, successful MTW tenure and according to AH's Amended and Restated MTW Agreement, **AH is not required to conduct any evaluations** on its MTW Demonstration or any of its specific MTW Activities. However, under AH's Legacy Attachment B, AH formulated elements for inclusion in its MTW Annual Plans/Reports beginning with AH's FY 2006 MTW Annual Report and its FY 2007 MTW Annual Plan. Most recently, AH commissioned Emory University to conduct a periodic study to review AH's six rental assistance programs:

- AH-Owned
- AH-Owned – Mixed Communities
- HomeFlex
- HomeFlex – Mixed Communities
- Homeownership
- Housing Choice Vouchers

Since FY 2021 is a non-deliverable year and AH does not plan to extend the periodic study contract, AH feels that this is the perfect time to exercise guidance received during HUD's site visit in August 2019 and followed-up via teleconference in December 2019. Therefore, **AH will not include non-HUD-mandated evaluations in future MTW Annual Plans and Reports.**

Although AH is not required to conduct an evaluation, AH realizes the benefits of evaluations. Evaluations help build capacity within the agency and help improve processes and procedures to name a few benefits. Therefore, AH may self-impose another periodic study or explore self-evaluation replicating elements from external housing researchers and reviewers such as Abt Associates or some other reviewing parameters to create an internal tool. In addition, AH understands that both evaluation approaches will help AH to continue its long, successful MTW record of accomplishment while presenting a significant costs savings to the agency.

Finally, under Legacy Attachment D, AH identified MTW Program Benchmarks that AH will continue to report on in its MTW Annual Reports.

APPENDIX D

LOCAL ASSET MANAGEMENT PLAN (LAMP)

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Local Asset Management Program

Background and Introduction

AH's Amended and Restated Moving to Work Agreement (MTW Agreement), effective as of November 13, 2008; and as further amended by the Second Amendment effective January 16, 2009; and as extended by Congress to June 30, 2028 and confirmed by HUD on April 14, 2016, authorizes AH to design and implement a Local Asset Management Program for its Public Housing Program and describe such program in its Annual MTW Plan. The term "Public Housing Program" means the operation of properties owned or units in mixed-income communities subsidized under Section 9 of the 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, financial management and any deviations from HUD's asset management requirements. Under the First Amendment to the MTW Agreement, AH 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

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

In addition, mixed-income, mixed-financed (MIXED) rental communities that contain authority-assisted units under the Public Housing Program are owned, managed and operated by third party partnerships as established at the time each of the transactions were structured.

AH maintains a separate budget and accounting for the operating subsidy paid to the owners of these communities, but does not maintain the accounting for property operations as AH does not own nor operate these properties.

Identification of Cost Allocation Approach

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

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

Classification of Costs

There is no universal rule for classifying certain costs as either direct or indirect under every accounting system. A cost may be direct with respect to some specific service or function, but indirect with respect to the Federal award or other final cost objective. Therefore, the definitions and guidelines provided in this 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 activities 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 is 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 (Federal awards). Generally, the direct cost base selected should result in each award bearing a fair share of the indirect costs in reasonable relation to the benefits received from the costs.

AH Cost Objectives

AH has identified the following cost objectives:

Direct Costs:

MTW Program - 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 AH's MTW Agreement and Annual MTW Plan.

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

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

Other Federal, State and Local Awards – AH may be the recipient of other Federal, State and Local awards from time to time. Each of these awards will be established as a separate cost objective, as necessary.

Non Federal Programs – This relates to entrepreneurial activities, some AH Affiliate/Component Units and National Housing Compliance, Inc., which are separate cost objectives.

AH Direct Costs

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

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

1. Contract costs readily identifiable with delivering housing assistance to low income families under the MTW Program,
2. Housing Assistance Payments (including utility allowances) for tenant based vouchers and AH HomeFlex supported communities,
3. Portability administrative fees,
4. Homeownership voucher funding,
5. Foreclosure and emergency assistance for low income families served under the Housing Choice Voucher Program,
6. AH costs for administering Housing Choice Tenant-Based vouchers including inspection activities

7. Operating costs directly attributable to operating AH-owned properties,
8. Capital improvement costs at AH-owned properties,
9. Operating subsidies paid to MIXED Communities,
10. AH costs associated with managing AH-Owned Communities, HomeFlex, Housing Choice Homeownership vouchers, MIXED Communities, and other AH-owned real estate,
11. AH costs directly attributable to MTW Program activities, including the administration of human development and supportive services programs,
12. AH costs associated with development and revitalization activities with costs as defined in the next section, but paid using MTW Single Fund
13. Any other activities that can be readily identifiable with delivering housing assistance to low-income families under the MTW Program.

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

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

Special Purpose Housing Choice Tenant-based Vouchers direct costs include, but are not limited to, Housing Assistance Payments (HAP) (including utility allowances).

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

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

1. Legal expenses
2. Professional services
3. Utilities (gas, water, electric, other utilities expense)
4. Real estate taxes
5. Insurance
6. Bank charges
7. Staff training
8. Interest expense
9. Other costs required of a specific non-federal program, award or contract

Direct Costs – Substitute System for Compensation of Personnel Services

In addition to the direct costs identified previously, when required to charge direct staff time to a non-MTW funding source, AH will allocate direct salary and wages based upon quantifiable measures (substitute system) of employee effort rather than timesheets. This substitute system is allowed under 2 CFR Part 200, Section 200.430. The substitute system allows AH 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 Operating Divisions functions and measures effective July 1, 2016 are listed below:

Operating Divisions	Quantifiable Measure
Real Estate Group	<ul style="list-style-type: none">• Number of properties managed• Active revitalizations• Number of properties and developments supported
Housing Choice Voucher Program	<ul style="list-style-type: none">• Leased vouchers
Inspection Services	<ul style="list-style-type: none">• Number of inspections
Partnerships and People Investments	<ul style="list-style-type: none">• Families served• Partnerships actively engaged

AH Fee for Service for Corporate Support

Corporate Support consists of administrative and support departments which support the Operating Divisions and AH as a whole. AH establishes 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 programs not funded by the MTW Single Fund. Based on current budget estimates, AH projects the indirect cost fee to be approximately 11% of total direct costs, subject to the limitations identified below.

Limitation on indirect cost or administrative costs – AH 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, AH will charge such costs to the remaining cost objectives as defined in this Local Asset Management Program, while ensuring that only authorized expenditures are charged to the cost objectives and their related funding sources. AH ensures that no costs are charged to federal funds unless authorized under federal law or regulation.

Implementation of AH's Local Asset Management Program

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

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

AH has the ability to define direct costs differently than the standard definitions published in HUD's Financial Management Guidebook pertaining to the implementation of 24 CFR Part 990.

AH is required to describe any differences between the 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. AH implemented a fee for service system that was more comprehensive than HUD's asset management system. HUD's system was limited in focusing only on a fee-for-service system at the property level and failed to address AH's comprehensive operation which includes other programs and business activities. AH'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 AH operation.

2. AH defined its cost objectives at a different level than HUD's asset management system. Specifically, AH defined the MTW Program as a cost objective which is consistent with the issuance of CFDA 14.881, Moving to Work Demonstration Program. 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.