

# **2019 ANNUAL MTW PLAN**

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# **ANNUAL MOVING-TO-WORK PLAN**

## **Submitted by:**

**The Housing Authority of Columbus, Georgia**

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Cover Photo: *Columbus Commons: HACG's newest mixed-income property; completed November 2017*  
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THE HOUSING AUTHORITY OF COLUMBUS, GEORGIA (**HACG**)  
MAKES ITS **2019 ANNUAL MTW PLAN** AVAILABLE TO THE PUBLIC FROM  
**JANUARY 26, 2018 – FEBRUARY 25, 2018** FOR REVIEW AND COMMENT.

THE DOCUMENT IS AVAILABLE AT THE FOLLOWING LOCATIONS:

- THE **COLUMBUS PUBLIC LIBRARY**, 3000 MACON ROAD,
  - 2<sup>nd</sup> Floor Reference Room, Government Documents Section
- HACG'S **FRONT DESKS**:
  - HACG's **Central Office**, 1000 Wynnton Road
  - HACG's **Rental Offices**, various addresses city-wide
  - HACG's **Tenant Selection Office**, 1180 Martin Luther King Blvd.
- HACG'S WEBSITE: **[WWW.COLUMBUSHOUSING.ORG](http://WWW.COLUMBUSHOUSING.ORG)**

## Glossary of Abbreviations and Acronyms

ACC	Annual Contributions Contract
ACOP	Admission and Continued Occupancy Plan (Public Housing)
Admin Plan	Administrative Plan (Housing Choice Vouchers)
AFFH	Affirmatively Furthering Fair Housing
AFH	Assessment of Fair Housing ( <i>AFFH Tool</i> )
BoC	Board of Commissioners
CAPS	Childcare and Parent Services ( <i>program under GA Department of Early Care and Learning or DECAL</i> )
CCG	Columbus Consolidated Government ( <i>City of Columbus AND Muscogee County</i> )
CHAP	Commitment to enter into Housing Assistance Payment ( <i>subsidy fund change</i> )
CoC	Continuum of Care ( <i>City of Columbus, Muscogee and Russell Counties</i> )
Comp Plan	Comprehensive Plan ( <i>prepared by CCG for long-term planning</i> )
Con Plan	Consolidated Plan ( <i>prepared by CCG for CDBG and HOME funds</i> )
CoP	Contract of Participation ( <i>element of the FSS Program</i> )
CSU	Columbus State University
DBHDD	GA Department of Behavioral Health and Developmental Disabilities
DCA	GA Department of Community Affairs
DFCS	Division of Family and Children Services ( <i>under GA Department of Human Services or DHS</i> )
EOGY	End-of-Grant Year
EOY	End-of-Year
FMR	Fair Market Rent ( <i>set by HUD annually</i> )
FO	Field Office ( <i>HACG falls under the Atlanta FO</i> )
FSS	Family Self-Sufficiency Program
FTE	Fulltime Equivalent
FYE	Fiscal Year End
HACG	The Housing Authority of Columbus, Georgia
HAP(P)	Housing Assistance Payment (Program)
HCV	Housing Choice Voucher
HFA	Housing Finance Agency ( <i>DCA is the HFA for Columbus</i> )
HfG	Home for Good

## Glossary of Abbreviations and Acronyms – continued

HQS	Housing Quality Standards
HUD	US Department of Housing and Urban Development
IRS	Internal Revenue Service ( <i>Bureau of the US Department of Treasury</i> )
ITSP	Individual Training and Service Plan ( <i>element under the FSS Program</i> )
LAMP	Local Asset Management Plan
LIHTC	Low-Income Housing Tax Credit ( <i>disbursed by GA DCA</i> )
LURA	Land Use Restriction Agreement
LURC	Land Use Restrictive Covenants
MOA/U	Memorandum of Agreement/Understanding
MTW	Moving-to-Work Demonstration Program ( <i>allows fungibility and flexibility</i> )
NNC	Neighborhood Network Center ( <i>computer lab or learning lab</i> )
NSV	Next Step Voucher
PBCA	Performance-Based Contract Administrator
PBRA	Project-Based Rental Assistance
PBV	Project-Based Voucher
PCA/PNA	Physical Condition Assessment/Physical Needs Assessment
PH	Public Housing
PHA	Public Housing Agency/Assistance/Authority
PHAS	Public Housing Assessment System
PIC	Public and Indian Housing Inventory Management System ( <i>formerly known as: Public and Indian Housing Information Center</i> )
PIH	Public and Indian Housing
PUC	Per Unit Cost
QAP	Qualified Allocation Plan ( <i>guidelines established by DCA for LIHTC funds</i> )
RAB	Resident Advisory Board
RAD	Rental Assistance Demonstration Program ( <i>converts PH units to PBRA or PBV</i> )
RAD PBV	RAD Project-Based Voucher ( <i>designation for former PH units/participants</i> )
ROSS	Resident Opportunities and Self-Sufficiency
RRV	Rapid Rehousing Voucher
S8	Section Eight ( <i>Housing Choice Voucher Rental Assistance Program</i> )
S9	Section Nine ( <i>Public Housing Rental Assistance Program</i> )

## Glossary of Abbreviations and Acronyms – continued

SEMAP	Section Eight Management Assessment Program
SRO	Single-Room Occupancy Program ( <i>Moderate Rehabilitation Certificates</i> )
TBV	Tenant-Based Voucher
TPV	Tenant-Protection Voucher ( <i>automatic conversion to a TBV after 12-months</i> )
TSO	Tenant Selection Office
TTP	Total Tenant Payment
UA	Utility Allowance
URP	Utility Reimbursement Payment
VASH	Veterans Affairs Supportive Housing Voucher Program
VAWA	Violence Against Women Act
VI-SPDAT	Vulnerability Index – Service Prioritization Decision Assistance Tool
VMS	Voucher Management System



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## B. Overview

The United States Department of Housing and Urban Development (**HUD**) oversees rules and regulations, including funding levels, for the nation's Section 8 (**S8**) and Section (**S9**) Rental Assistance Programs. The S8 Program, known as Housing Choice Vouchers (**HCV**) and the S9 Program, known as Public Housing (**PH**) are administered locally by over 3,300 Public Housing Authorities (PHAs) nationwide.

The Omnibus Consolidated Receptions and Appropriations Act of 1996 authorized 30 Moving-to-Work (**MTW**) PHAs. The number of MTW PHAs in the MTW Demonstration Program has shrunk and grown over the years. Today, there are 39 MTW PHAs nationwide. The Housing Authority of Columbus, Georgia (**HACG**), the largest provider of affordable housing in the Chattahoochee River Valley Area of Alabama and Georgia, began its journey with a MTW designation in 2012.

Prior to signing its MTW Agreement<sup>1</sup> with HUD, HACG managed a diverse rental portfolio complete with market-rent units, PH units, Project-Based Rental Assistance (**PBRA**) units, Project-Based Voucher (**PBV**) units, Single-Room Occupancy (**SRO**) certificates, Tenant-Based Vouchers (**TBVs**), and Veteran Affairs Supportive Housing (**VASH**) vouchers that addressed various low-income family compositions. Since then, HACG has added Low-Income Housing Tax Credit (**LIHTC**) units and Tenant-Protection Vouchers (**TPVs**) to its rental portfolio, which increases programming diversity and complexity.

HACG also sponsors and/or supports a Family Self-Sufficiency (**FSS**) Program, a S8 Homeownership Program, multiple Neighborhood Network Centers (**NNCs**), and provides local transportation services for program participants at HACG-owned sites.

Under the MTW Demonstration Program, the Rental Assistance Demonstration (**RAD**) Program, and other affordable housing programs, HACG has been able to serve specific, low-income populations that it could not have served as a conventional PHA. These programs have provided HACG with leverage and flexibility to evolve its business model in directions far beyond the abilities of a conventional PHA.

As a MTW PHA, HACG is obligated to meet MTW Statutory Objectives when designing MTW Activities. The MTW Statutory Objectives are:

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

Following are selected highlights planned for HACG's 2019 fiscal year:

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<sup>1</sup> July 3, 2013. The agreement has been extended through 2028.

**Combine operating subsidies** and capital and management funding awards **to form the MTW Block Grant**. This “grant” is HACG’s funding source to deliver housing programs and services within HACG’s service jurisdiction.

**Design MTW Activities**, through use of waivers, that align **with current MTW Statutory Objectives**. Proposed activities in this Plan are listed below:

- Reduce Cost
  - ✓ Minimum Rent Increase/Utility Reimbursement Payment Decrease
  - ✓ Project-Basing Flexibilities (*re-proposed*)
- Increase Housing Choices
  - ✓ Site-Based Housing Flexibility (*re-proposed; formerly Over House 1-Bedroom Eligible Families in 2 Bedroom Units*)

Continue to **monitor and evaluate** effectiveness of existing, HUD-**approved MTW Activities**. In addition, strengthen and increase agency capacity to **position HACG** to secure designation **as a Regional MTW Agency**<sup>2</sup> should such an opportunity become available to MTW PHAs.

Continue to execute **Non-MTW Activities** such as the agency portfolio conversion plan and implementation of the Smoke Free Housing Rule. HACG received a full portfolio award to **convert** its conventional **PH units to** long-term S8 assisted **PBV units under RAD**. During 2019, HACG plans to initiate Phase II (184 units) and/or Phase III (249) of its conversion plans. Once these phases are complete, HACG will have 163 units of conventional PH in its portfolio. Of the 163 PH units, 108 units are in a site being planned for redevelopment. The balance of PH units (55) will convert after the redevelopment plans are finalized.

Because of RAD requirements, **converting units may have to be modernized**, which may activate local building code requirements, which may require resident relocation, and/or similar “dormant” issues. Therefore, in response to these possibilities, **HACG may submit LIHTC application(s)** to secure funding to meet such issues. Additionally, HACG will **implement the smoke-free housing rule**, as applicable to HACG’s rental housing portfolio.

Continue to **recruit, develop, and strengthen partnerships** with local agencies, landlords, service providers, staff, and other groups instrumental to HACG’s service delivery and housing programs.

In addition to other non-MTW Activities highlighted above, HACG will continue to **seek** Federal and foundation funding **awards**, private donations, and similar funding sources **that benefit its program participants and/or its service delivery capacity**.

HACG separates MTW and non-MTW goals below; however, some MTW and/or non-MTW goals may overlap one another, so goals are categorized by primary intent.

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<sup>2</sup> As discussed in the Cranston-Gonzalez National Affordable Housing Act

## 2019 MTW Goals and Objectives

- Maximize use of single-fund budget with full flexibility
  - Combine all operating subsidies and capital and management funding awards
  - Use combined funds to meet stated management goals and MTW Statutory Objectives
- Implement cost effectiveness initiatives
  - ✓ MTW Activity 2019.01 – Minimum Rent Increase/Utility Reimbursement Payment Decrease (**URP**)
    - Set-up details of activity for staff training, data collection, reporting, and similar purposes
    - Reduce (or eliminate) URP check issuance over next two years
    - Increase minimum rent over two-year period
    - Notify program participants by mail, in person, and other mediums
    - Plan for **partial implementation by January 1, 2019**
  - ✓ MTW Activity 2016.03 – Project-Basing Flexibilities (*re-proposal*)
    - Set-up details of activity for staff training, data collection, reporting, and similar purposes
    - Update HACG’s Administrative Plan (**Admin Plan**), Admissions and Continued Occupancy Plan (**ACOP**), and/or other policy documents
      - Continue local process to determine rent reasonableness at HACG-owned properties (direct and indirect ownership) and on HACG-owned units
      - Continue certifying HACG-owned assisted housing units
- Implement initiatives to increase housing choices
  - ✓ MTW Activity 2019.02 – Site-Based Housing Flexibility (*re-proposal; formerly Over House 1 BR Eligible Families in 2 BR Units*)
    - Set-up details of activity for staff training, data collection, reporting, and similar purposes
    - Update HACG’s Admin Plan, ACOP, and/or other policy documents
      - Modify “transfer” form or create lease rider for impacted families
      - Allow otherwise eligible, qualified families to occupy larger units until an appropriate-sized family becomes available to occupy that unit
      - Allow gap payment assistance to the landlord on behalf of the family until an appropriate-sized family becomes available to occupy that unit
- Collect, analyze, and synthesize data for external and internal purposes
  - Monitor and track MTW data to complete plans, reports, surveys, and similar platforms
  - Continue to build capacity for staff designated as Yardi<sup>3</sup> trainers to increase capacity for Yardi end-users
  - Strengthen MTW Activity reviews and recommendations for non-compliant issues
  - Cross reference **HUD-approved** MTW Activities with published guidance documents to ensure approved MTW Authorizations are relevant and necessary:

Activity Number	Activity Name	MTW Authorization(s)
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<sup>3</sup> HACG switched tracking software to Yardi in FYE2015



2014.02	Innovations to Reduce Homelessness	D.2.a, D.2.b, D.2.c, D.4
2014.03	Administrative Reforms (HCV elements only)	D.3.a, D.3.b
2014.04	Administrative Efficiencies (HCV elements only)	D.1.c
2015.02	Portability Restrictions	D.1.g
2015.03	Simplified Utility Allowance (UA) Calculation	D.2.a
2015.04	Cap Childcare Deduction	C.11, D.2.a
2016.01	Next Step Vouchers	D.2.d, D.3.a, D.3.b, D.4
2016.02	Non-Competitive Project-Basing Process	D.7.a
2018.01	Eliminate/Reduce Interim Certification Examinations	C.11

- **Pending HUD-approval MTW Activities:**

Activity Number	Activity Name	MTW Authorization(s)
2019.01	Minimum Rent Increase/Utility Reimbursement Payment (URP) Decrease	C.11, D.2.a
2016.03	Project-Basing Flexibilities (re-proposed to add elements)	D.1.e, D.2.c, D.5
2018.02	Site-Based Housing Flexibility (re-proposed; formerly Over-House 1- BR Eligible Families in 2-BR Units)	D.1.b, D.2.b

- Collect, analyze, and synthesize data for external and internal purposes
  - Cross reference **HACG-closed** MTW Activities with published guidance documents to acknowledge obsolescence of HUD-approved MTW Authorizations:

Activity Number	Activity Name	MTW Authorization(s)
2014.01	Community Choice (approved FYE2015)	D.2.a, D.2.b, D.2.c
2014.03	Administrative Reforms (PH elements closed-out)	C.11
2014.04	Administrative Efficiencies (PH elements closed-out)	C.4
2014.05	Streamline Housing Quality Standards (HQS) Inspections	D.5 (moved to 2016.03)
2014.06	Rent Reform (Farley)	C.4, C.11
2015.01	Eliminate Child Support Income from Rent Calculation	C.11

- HACG used LIHTC funds to meet RAD requirements, which made PH elements under MTW Activities 2014.03 and 04 functionally obsolete
- Activities granted under MTW Activity 2014.05 are authorized under Attachments K and L of Notice PIH 2016-05
  - Elements of closed-out activities are “transferred” to MTW Activity 2016.03 to ensure HACG’s continuance of granted flexibility not otherwise covered/addressed under the ‘streamlining’ Notice
- HACG used LIHTC funds to meet RAD requirements, which made MTW Activity 2015.01 functionally obsolete
- Strengthen MTW evaluator agreement
  - Review Sub-Grantee Agreement with Columbus State University (CSU)
    - Update terms of Sub-Grantee Agreement as appropriate
    - Enter new agreement with successor evaluation team, if appropriate
      - Consider internal-membered evaluation team and/or combination team
    - Educate, re-educate evaluation team on MTW Program



## 2019 Non-MTW Goals and Objectives

- Meet requirements of HUD
  - Maintenance of financial records, housing units, etc.
  - Implement Flat Rent Mandate (80% of Fair Market Rent (**FMR**)) – PH units only
  - Implement Smoke-Free Rule – **effective July 1, 2018**
- Meet requirements of RAD
  - Complete close-out procedures for RAD I Rehabilitation Projects
    - E.F. **Farley** (102 units); E.J. **Knight** (52); E.J. **Knight Senior** (40); Brown **Nicholson** (100); and Luther **Wilson** (289)
  - Convert remaining stock of PH units to PBV units
    - Update, as applicable, modernization plans for next conversion phases
      - Elizabeth **Canty** (249 units); George **Rivers** (24); and Warren **Williams** (160)
      - Conversion and/or modernization plans may require building(s) demolition
    - Determine appropriate funding vehicle to convert above listed units
      - Rehabilitation work is estimated at \$40,000/unit
      - Use of MTW Block Grant funds is considered (funds will be available)
  - Finalize RAD conversion plan for remaining PH units
    - Louis **Chase** (108 units); Columbus Commons (24); and Patriot Pointe (31)
- Meet requirements of GA Department of Community Affairs (**DCA**)
  - Complete close-out procedures of Booker T. Washington (**BTW**)-Chapman Phase II Redevelopment Project (known as Columbus Commons<sup>4</sup>)
  - Design and implement supportive services programming in compliance with appropriate DCA Qualified Allocation Plan (QAP)
    - Family Sites: Farley (102 units); Knight Gardens (52); and Wilson (289)
    - Senior Sites: Knight Senior (40 units) and Nicholson (100)
    - Assess position control elements to determine supportive services staffing levels
  - Plan supportive services programming for rehabilitation projects that may use LIHTC funding
    - RAD II Rehabilitation Projects: Rivers (24 units) and Williams (160)
    - RAD III Rehabilitation Projects: Canty (249 units)
      - DCA's QAP year dictates the level and type of supportive services programming required at sites that use LIHTC funds
      - HACG plans to offer supportive services programming levels that commensurate with the level of project completion

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<sup>4</sup> State of Georgia refers residents in accordance with the Olmstead Agreement dated October 29, 2010.

## Beyond 2019 MTW Goals and Objectives

- Introduce new initiatives that meet MTW Statutory Objectives
  - Propose and/or re-propose MTW Activities that meet local housing needs, such as:
    - *Workforce Housing* – HACG may construct and/or significantly rehabilitate structures for this purpose
    - *Term/Time Limits* – HACG may set limits for assistance and may exclude population groups
    - *Re-Development Flexibility* – HACG may redevelop or significantly rehabilitate existing public housing sites in the same location or locations contiguous or adjacent to current sites and/or challenging Census Tracts
  - Analyze and evaluate need for targeted exceptions. Current examples include:
    - Provision of *Emergency Housing/Minor Disaster vouchers*
    - Support for *different rent calculation* for elderly, employed, and similar families
    - Introduction of *educational, employment, and similar typed incentives*
    - Create incentive and/or preference *program for non-traditional “custodial parents”* (e.g., aunts, fathers, grandparent, uncles, et al) and similar guardians
    - Develop *program to “graduate” families off assistance* to homeownership, market units, workforce housing, or similar “graduation” indicator
    - Design a *re-entry program*, in partnership, for ex-offenders
- Position HACG to become designated as a Regional MTW Agency
  - Monitor guidance documents, such as Federal Register, Notices PIH, and similar
  - Increase MTW, management, and similar program capacities to be competitive in a designation selection process should such a designation become available

## Beyond 2019 Non-MTW Goals and Objectives

- Meet requirements of HUD
  - Monitor guidance documents, such as Federal Register, Notices PIH, and similar
  - Review Wait List process for efficiency and fairness
    - Consider other Wait List types, including hybrid or preference Wait Lists
- Meet requirements of RAD
  - Convert remaining stock of PH units to PBV units
    - RAD IV Redevelopment Project: Chase (108 units)
    - Columbus Commons (31) and Patriot Pointe (24)
- Meet requirements of DCA
  - Design and implement supportive services programming in compliance with appropriate DCA QAP (Qualified Allocation Plan)
    - Family sites: Chase (108 units) and Columbus Commons (31)
    - Senior sites: Patriot Pointe (24 units)
    - Review historical position control to determine/project staffing needs
      - DCA’s QAP year dictates level and type of supportive services programming
- Ensure peaceful enjoyment of units (as controllable by HACG)
  - Improve enforcement of all lease agreement elements
  - Continue annual background checks of all adults listed on lease agreement
  - Recruit landlord partners in areas of opportunity to project-base assistance

- Improve collection rate of payment agreements with current and former program participants
- Change Agency's fiscal year
  - Determine if fiscal year change is beneficial to HACG
    - Review fiscal years of partner agencies e.g., Federal, State, contracted PHAs, etc.
  - HACG is considering a move to a calendar fiscal year January to December
    - Must receive approval from appropriate governing body to change fiscal year



## II. GENERAL HOUSING AUTHORITY OPERATING INFORMATION

### A. Housing Stock Information

A. MTW Plan: Housing Stock Information											
Planned New Public Housing Units to be Added During the Fiscal Year											
AMP Name and Number	Bedroom Size							Total Units	Population Type *	# of UFAS Units	
	0	1	2	3	4	5	6+			Fully Accessible	Adaptable
	0	0	0	0	0	0	0	0	N/A		
	0	0	0	0	0	0	0	0	N/A		
	0	0	0	0	0	0	0	0	N/A		
	0	0	0	0	0	0	0	0	N/A		
<b>Total Public Housing Units to be Added</b>								<b>0</b>			
<p>* Select Population Type from: Elderly, Disabled, General, Elderly/Disabled, Other</p> <p>If Other, please describe: <span style="border: 1px solid black; padding: 2px;">N/A</span></p>											
Planned Public Housing Units to be Removed During the Fiscal Year											
PIC Dev. # / AMP and PIC Dev. Name	Number of Units to be Removed		Explanation for Removal								
GA 004000405 Warren Williams	184		104 PH units are being converted to long-term S8 assisted PBV units under RAD. The remaining 80 PH units are being removed by disposition because they lie within or their access lies within a regulatory floodway.								
GA 004000408 Elizabeth Canty	249		233 PH units are being converted to long-term S8 assisted PBV units under RAD. The remaining 16 PH units are being removed by demolition/disposition because they lie within or their access lies within a regulatory floodway.								
<b>Total Number of Units to be Removed</b>		<b>433</b>									

The table below identifies HACG’s remaining PH units beyond FYE2019. Also, the table includes current plans for those units.

<b>REMAINING PUBLIC HOUSING UNITS</b>				
<b>PIC #</b>	<b>PIC Name</b>	<b>Housing Type</b>	<b>Total Units</b>	<b>Current Plans*</b>
GA 004 000407	Louis Chase	Family	108	Primary <b>plans include the demolition and redevelopment of this site</b> under HACG's S8 Project-Based Program. Alternate plans include partnerships with the city and landlords involving partial redevelopment and transfer of assistance citywide. Primary plans may start as early as FYE2020. Alternate plans have a later timetable.
GA 004 000423	Patriot Pointe	"Near" Elderly	24	Primary <b>plans include completion of HUD milestones after it completes its current conversion plan.</b> Units at this site will be converted to PBV units under RAD. HACG's RAD conversion award was amended June 9, 2014 to include these PH units that were under construction after HACG's conversion award was approved.
GA 004 000424	Columbus Commons	Family	31	Primary <b>plans include completion of HUD milestones after it completes its current conversion plan.</b> Units at this site will be converted to PBV units under RAD. HACG's RAD conversion award was amended June 9, 2014 to include these PH units that were in the construction phase after HACG's conversion award was approved.

HACG Chart #1

*\*As of December 31, 2017*

**New Housing Choice Vouchers to be Project-Based During the Fiscal Year**

Property Name	Anticipated Number of New Vouchers to be Project-Based *	Description of Project
Warren Williams	104	Conversion of PH units to long-term S8 PBV assisted units under RAD
Elizabeth Canty	233	Conversion of PH units to long-term S8 PBV assisted units under RAD
N/A	N/A	N/A
N/A	N/A	N/A

<b>Anticipated Total New Vouchers to be Project-Based</b>	<b>337</b>	Anticipated Total Number of Project-Based Vouchers Committed at the End of the Fiscal Year	<b>1833</b>
		Anticipated Total Number of Project-Based Vouchers Leased Up or Issued to a Potential Tenant at the End of the Fiscal Year	<b>1833</b>

\*New refers to tenant-based vouchers that are being project-based for the first time. The count should only include agreements in which a HAP agreement will be in place by the end of the year.

**Other Changes to the Housing Stock Anticipated During the Fiscal Year**

HACG anticipates a rhythmic exchange of units between the General Contractor and HACG, where units may be taken off-line for modernization work and then put back on-line once the work is completed during FYE2019. Therefore, residents may be temporarily relocated and moved back in during this second and/or third phase of HACG's RAD conversion activities.

HACG anticipates moving forward with the creation of an affordable PBV housing community designed to house homeless families and veterans. Feasibility study results will guide HACG's actions, in the form of property acquisition or partnership development, during the fiscal year in order to accommodate targeted population group utilizing MTW RRVs and/or VASH vouchers.

HACG anticipates the possibility of acquiring property or entering into a partnership agreement during FYE2019 to create a workforce housing community focused on providing subsidized housing for "working poor" families

Examples of the types of other changes can include but are not limited to units that are held off-line due to the relocation of residents, units that are off-line due to substantial rehabilitation and potential plans for acquiring units.

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

HACG plans to expend approx. \$15M (\$30k/unit) on capital projects. Capital expenditures are related to its RAD conversion. All expenditures *are not* captured here; material costs, project needs, and other guiding factors may require plan changes. Meanwhile, HACG continues tasks that maintain units and/or meet RAD requirements. HACG plans to expend \$1.25M at Canty to replace all electrical panels, all exterior doors, upgrade to energy-efficient windows, and perform sewer line upgrades and drainage work; \$250k at Chase to prep for site redevelopment, which may include environmental reviews, updated testing results, survey and legal work, consulting services, and similar tasks necessary to redevelop the current site; \$1M at Williams to upgrade all units to energy-efficient appliances, update HVAC units/systems, and perform sewer line upgrades and drainage work; \$250k and/or balances thereof will be encumbered for agency-wide non-dwelling structures and equip., preventative maintenance of non-dwelling structures and equip., admin. and op fess and costs for prelim. and completed project plans, and/or similar tasks necessary to convert, maintain, or update its affordable housing portfolio

**B. Leasing Information**



**B. MTW Plan: Leasing Information**

**Planned Number of Households Served at the End of the Fiscal Year**

MTW Households to be Served Through:	Planned Number of Households to be Served*	Planned Number of Unit Months Occupied/Leased***
Federal MTW Public Housing Units to be Leased	317	3,804
Federal MTW Voucher (HCV) Units to be Utilized	3,448	41,373
Number of Units to be Occupied/Leased through Local, Non-Traditional, MTW Funded, Property-Based Assistance Programs **	X	X
Number of Units to be Occupied/Leased through Local, Non-Traditional, MTW Funded, Tenant-Based Assistance Programs **	X	X
<b>Total Households Projected to be Served</b>	<b>3,765</b>	<b>45,177</b>

\* Calculated by dividing the planned number of unit months occupied/leased by 12.  
 \*\* 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 PHA should estimate the number of households to be served.  
 \*\*\*Unit Months Occupied/Leased is the total number of months the PHA has leased/occupied units, according to unit category during the fiscal year.

**Reporting Compliance with Statutory MTW Requirements**

If the PHA has been out of compliance with any of the required statutory MTW requirements listed in Section II(C) of the Standard MTW Agreement, the PHA will provide a narrative discussion and a plan as to how it will return to compliance. If the PHA is currently in compliance, no discussion or reporting is necessary.

N/A

**Description of any Anticipated Issues Related to Leasing of Public Housing, Housing Choice Vouchers and/or Local, Non-Traditional Units and Possible Solutions**

Housing Program	Description of Anticipated Leasing Issues and Possible Solutions
Housing Choice Vouchers	Anticipated leasing issues include families not returning to converted units, managing Choice Mobility requests, and locating short term options for families impacted by the rehabilitation work. Solutions include implementing successful RAD I strategies, processing new program admissions, and recruiting new landlord partners.
Public Housing	As a result of RAD conversions, there will be a number of units that will be on and off-line attributed to rhythmic exchange of units between HACG and General Contractors. This unit exchange may require residents to be relocated to complete the modernization work. The relocation efforts may cause extended periods of vacancy that should resolve itself as residents move into the completed units. Solutions include implementing successful RAD I strategies and processing new program admissions to reduce anxieties associated with extended vacancies.

## C. Wait List Information

C. MTW Plan: Wait List Information				
Wait List Information Projected for the Beginning of the Fiscal Year				
Housing Program(s) *	Wait List Type**	Number of Households on Wait List	Wait List Open, Partially Open or Closed***	Are There Plans to Open the Wait List During the Fiscal Year
Federal MTW Housing Choice Vouchers	Community-Wide	600	Closed	No
MTW Rapid Rehousing Vouchers; MTW Next Step Vouchers	Program Specific	70	Partially Open	Yes
Federal MTW Public Housing Units; Converted PH Units to RAD Project-Based Vouchers	Merged	4566	Open	Yes

Rows for additional waiting lists may be added, if needed.

\* *Select Housing Program* : Federal MTW Public Housing Units; Federal MTW Housing Choice Voucher Program; Federal non-MTW Housing Choice Voucher Units; Tenant-Based Local, Non-Traditional MTW Housing Assistance Program; Project-Based Local, Non-Traditional MTW Housing Assistance Program; and Combined Tenant-Based and Project-Based Local, Non-Traditional MTW Housing Assistance Program.

\*\* *Select Wait List Types* : Community-Wide, Site-Based, Merged (Combined Public Housing or Voucher Wait List), Program Specific (Limited by HUD or Local PHA Rules to Certain Categories of Households which are Described in the Rules for Program Participation), None (If the Program is a New Wait List, Not an Existing Wait List), or Other (Please Provide a Brief Description of this Wait List Type).

\*\*\* For Partially Open Wait Lists, provide a description of the populations for which the waiting list is open.

HACG's MTW Rapid Rehousing Voucher (RRV) Program partners with Home for Good (HfG) to serve, by referral, chronically homeless families with a VI-SPDAT score of 10 or more. The program provides a priority preference for chronically homeless veterans that meet the same criteria.
HACG's MTW Next Step Voucher (NSV) Program partners with the local DFCS office to serve, by referral, youth aging out of Foster Care. The program provides a voucher for properly referred youth that have exhausted state resources.
N/A

If Local, Non-Traditional Housing Program, please describe:

N/A
N/A
N/A

If Other Wait List Type, please describe:	
	N/A
	N/A
	N/A
If there are any changes to the organizational structure of the wait list or policy changes regarding the wait list, provide a narrative detailing these changes.	
<p>HACG manages multiple Wait Lists for its diverse rental assistance programs. HACG continues to develop its Alternative Mobility Wait List, where 75% of turnover tenant-based vouchers (TBVs) are obligated to project-based voucher (PBV) families seeking to exercise their Choice Mobility Option. The remaining 25% of turnover TBVs are committed to HACG's conventional TBV Wait List. During this period, HACG extends the occupancy time from 12 months to 24 months for PBV families to provide site stabilization and voucher processing time.</p>	

The Agency's Project-Based Voucher (PBV) units, including units converted under the Rental Assistance Demonstration (RAD) Program, will exceed 20% of HACG's authorized Housing Choice Voucher (HCV) Annual Contributions Contract (ACC). Because of the conversion impact, HACG adopted the Alternative Mobility Policy offered under PIH Notice H-2017-03 REV 3<sup>5</sup> (RAD Notice).

Per the RAD Notice, HACG will use three quarters of Tenant-Based Voucher (TBV) turnover to meet requests of families that exercise their Choice Mobility option. Multiple Wait Listing is allowed. Wait List may be consolidated to orderly track and manage PBV families exercising their Choice Mobility option. Both structures meet HACG's Choice Mobility obligation under the RAD Notice with HUD's Office of Recapitalization.

Based on current information, HACG projects that it will issue TBVs to RAD PBV families beginning January 1, 2019 because of their effective return date, January 1, 2017. Move-in, move-out data suggests a turnover of 8 TBVs each month. Under the Alternative Mobility option, 6 of the turnover TBVs are obligated to PBV families. The remaining 2 TBVs are issued to families on the conventional TBV Wait List.

<sup>5</sup> Supersedes PIH Notice 2012-32 (HA), REV 2

<b>HOUSING CHOICE VOUCHER WAIT LIST IMPACT ANALYSIS</b>			
<b>Category</b>	<b>TBV Wait List (old method)</b>	<b>TBV Wait List (alt. mobility)</b>	<b>RAD PBV WL (alt. mobility)</b>
Wait List Count*	656		
TBV Monthly Turnover	8	2	6
Wait List Time (years)	7	28	9

*HACG Chart #2*

*\*As of December 31, 2017*

Based on the analysis, HACG projects that families on the Alternative Mobility Wait List will wait 4 times longer and RAD PBV families will wait an additional 2 years longer than either group would wait under the conventional TBV Wait List method.

Although current TBV turnover is low and time is extended, HACG has witnessed periods of 20 or more turnover TBVs in a month and favors the additional occupancy time to plan and process turnover TBVs for an upcoming year.

### **III. PROPOSED MTW ACTIVITIES: HUD APPROVAL REQUESTED**

#### **2019.01 – Minimum Rent Increase/Utility Reimbursement Payment (URP) Decrease**

##### **A. Description of Proposed MTW Activity**

HACG seeks to improve its cost efficiency and promote self-sufficiency through the implementation of this activity. At the end of fiscal year 2017, HACG processed utility reimbursement payments (URPs) for over one-fourth (26.8%) of its program participants across all programs<sup>6</sup>. Almost one-third (32.7%) of processed URPs went to zero-income families and 40% of the URPs totaled less than the cost to process the URP. In other words, it cost HACG more to cut the check and mail it than what the check was worth.

Based on this inefficient use of Federal dollars, staff time, and low rents, HACG proposes this activity to reduce (or eliminate) the costs associated with processing URP checks and increase resident participation, across all programs, in their contribution towards their rental payment (or at the very least, actively ensure that HACG is not “paying” program participants to live on housing assistance). HACG intends to achieve its goal through multiple measures over a two-year period: 1) increase the minimum rent \$50 each year and 2) eliminate URP processing that falls below the set threshold to process URPs.

HACG is not changing the rent calculation method. That will continue as normal. HACG is setting a new absolute minimum for all rental assistance programs. HACG will continue to apply its Simplified Utility Allowances (UA)<sup>7</sup> and will continue to offer rental choices (10%, 30%, or minimum rent); many families report income, so many families pay more than the proposed minimum rent. However, the table on the next page illustrates the anticipated impact of the minimum rent increase on potential URPs to program participants:

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<sup>6</sup> As of June 30, 2017

<sup>7</sup> MTW Activity 2015.03 - Simplify Utility Allowance Calculations sets the UA by rental assistance program

<b>HOW MIN. RENT CHANGE IMPACTS MTHLY URP</b>			
<b>Period:</b>	<b>Current</b>	<b>FYE2019</b>	<b>FYE2020</b>
<b>Mthly Min. Rent</b>	\$ 50.00	\$ 100.00	\$ 150.00
<b>Minus Avg. UA*</b>	\$ 211.00	\$ 211.00	\$ 211.00
<b>= URP to Family</b>	\$ (161.00)	\$ (111.00)	\$ (61.00)

HACG Chart #3

\*Based on HACG's Simplified S8 UA Schedule

By way of information, HACG increased the minimum rent from \$50 to \$100 over a two-year period at its MTW Test Site, E.E. Farley<sup>8</sup>. During this period, HACG did not receive any hardship requests. Therefore, HACG does not plan to exclude any population group and plans to implement the same hardship provisions across all programs for all program participants as it did at E.E. Farley, its MTW test site.

The table below demonstrates that the proposed absolute minimum rent will have a minimal impact on “special” population groups than work-able households:

<b>HOW THE MINIMUM RENT CHANGE IMPACTS "SPECIAL" POPULATION GROUPS</b>			
<b>Family Category</b>	<b>% of HACG Population</b>	<b>Avg. Monthly Rent</b>	<b># Paying &lt;\$150/Mo.</b>
Elderly Only	3.9%	\$227	27
Elderly & Disabled	12.4%	\$197	113
Disabled Only	16.9%	\$191	176
Work-Able*	66.7%	\$147	1014

HACG Chart #3a

\*Defined as <62 yrs old; zero disability income

Work-Able families pay less rent than fixed-income neighbors. Also, more Work-Able families receive an URP check than any other population group. Consequently, HACG feels an increase in the minimum rent, across all programs, will motivate such families to increase their household income, use HACG’s self-sufficiency or supportive services programs, or at the very least, reduce the amount of URP checks being processed/received each month and reduce the number of families “living on housing assistance”.

<sup>8</sup> MTW Activity 2014.06 - Rent Reform (Farley)



Therefore, based on these theories, HACG intends to use **MTW Authorizations C.11 and D.2.a** of the Amended and Restated MTW Agreement to increase minimum rent \$50 across all rental assistance programs and to reduce the dollar value of URPs (or eliminate/reduce the dollar value and/or number of URPs processed) over a two-year period.

## **B. Describe How Activity Will Achieve One or More of the Statutory Objectives**

An increase in the minimum rent across all rental assistance programs significantly reduces the number of URPs processed, especially in negative rent situations. As of June 30, 2017, HACG processed over \$30,000 in URPs, which totals over \$360,000 when extrapolated over 12 months. The ability to eliminate this task, or significantly reduce the dollar value within the process, achieves **Cost Effectiveness** of Federal dollars.

Further, an increase in the minimum rent increases the accountability of program participants contributing towards their rental amount. Families contributing towards their rental amount *may* promote **Self-Sufficiency** and *may* **Increase Housing Choices**. At the very least, an increase in the minimum rent ensures that HACG is not “paying” families to live on housing assistance.

## **C. Identify and Discuss the Anticipated Impact of Activity on Stated Objectives**

### Positive Impact(s)

- Increase cost savings
- Increase staff productivity
- Increases awareness of families to search for practical, energy-efficient apartments or units where the utilities are included in the rent
- Families actively contribute to their rental amount; contributions significantly reduce the number of residents being “paid” to receive housing assistance
- Improve participation in self-sufficiency or supportive services opportunities
- Improve reporting accuracy of household income resulting from the elimination of cash benefits and subsequent participation in programs

### Negative Impact(s)

- Introduce concessions for zero-income households (count below and on next page)

<b>POTENTIAL UTILITY REIMBURSEMENT PAYMENT SAVINGS*</b>		
<b>Income Range</b>	<b>Category Count</b>	<b>Monthly Cost Savings</b>
\$0	291	\$ 15,423
\$1 - \$15,079	220	\$ 11,660
\$15,080 - \$30,160	54	\$ 2,862
>\$30,160	6	\$ 318
<b>Total</b>	<b>571</b>	<b>\$ 30,263</b>

HACG Chart #3b

\*As of June 30, 2017

HACG also identifies the impact on families by population group that may lose their URP:

<b>UTILITY REIMBURSEMENT IMPACT ANALYSIS*</b>		
<b>Family Category</b>	<b>Category Count</b>	<b>Monthly Cost Savings</b>
Elderly/Disabled	7	\$ 371
Elderly Only	12	\$ 636
Disabled Only	39	\$ 2,067
Zero-Income	291	\$ 15,423
<b>Total</b>	<b>349</b>	<b>\$ 18,497</b>

HACG Chart #3c

\*As of June 30, 2017

As indicated above, a small number of elderly and elderly and disabled families are currently receiving an URP check. Whereas disabled only families and Work-Able families make-up a larger population currently receiving an URP check. The latter groups may have the ability to gain employment compared to the other population groups' ability.

## D. Anticipated Schedules for Achieving the Stated Objectives

HACG anticipates the following implementation schedule:

- Between July 1, 2018 – December 31, 2018
  - Educate and train HACG staff on all elements of activity
  - Establish new minimum rents for all programs – **effective January 1, 2019**
    - New minimum rent may apply to existing program participants that have an interim certification examination after June 30, 2018<sup>9</sup>
  - Inform existing program participants of planned changes
    - HACG will send notices, post fliers, explain in person, use social media, and/or similar platforms to inform and notify existing program participants
    - Existing program participants may only have 6-months of new URP calculation if they have an interim certification after June 30, 2018
- Between January 1, 2019 – June 30, 2019
  - Ensure new admissions and existing participants that completed an interim certification examination during the period are not receiving an URP in error
    - No URPs <\$50 in 2019
    - No URPs <\$75 in 2020
- Use entire period (July 2018 – June 2019) to collect data to complete metrics

## E. Standard HUD Metrics that HACG Anticipates as a Result of Activity

HACG anticipates the following Standard HUD Metrics for this activity:

- Cost Efficiency #1 – Agency Savings
- Cost Efficiency #2 – Staff Time Savings
- Cost Efficiency #5 – Increase in Tenant Rent Share
- Self-Sufficiency #1 – Increase in Household Income
- Self-Sufficiency #3 – Increase in Positive Outcomes in Employment Status
- Self-Sufficiency #6 – Reducing Per Unit Subsidy Costs for Participating Households
- Self-Sufficiency #7 – Increase in Agency Rental Revenue
- Self-Sufficiency #8 – Households Transitioned to Self-Sufficiency

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<sup>9</sup> Based on adoption of ACOP or Admin Plan as appropriate to rental assistance program

## F. Baseline Performance Level for each Metric (Numeric Value) Prior to Implementation of MTW Activity

The tables below reflect preliminary data, which is recorded from FYE2017 tasks. HACG will use FYE2018 to collect final data to set the baseline and benchmarks for the duration of this activity.

<i>CE #1: Agency Cost Savings - Minimum Rent Increase/Utility Reimbursement Payment Decrease</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	Cost of task prior to implementation of the activity (in dollars).	Expected cost of task after implementation of the activity (in dollars).	Actual cost of task after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
	\$ 518,287	\$ 414,630	TBD	TBD

<i>CE #2: Staff Time Savings - Minimum Rent Increase/Utility Reimbursement Payment Decrease</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	Total amount of staff time dedicated to the task prior to implementation of the activity (in hours).	Expected amount of total staff time dedicated to the task after implementation of the activity (in hours).	Actual amount of total staff time dedicated to the task after implementation of the activity (in hours).	Whether the outcome meets or exceeds the benchmark.
	9779.0	7823.2	TBD	TBD

<i>CE #5: Increase in Tenant Rent Share - Min. Rent Increase/Utility Reimbursement Payment Decrease</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Tenant rental revenue in dollars (increase).	Tenant rental revenue prior to implementation of the activity (in dollars).	Expected tenant rental revenue after implementation of the activity (in dollars).	Actual tenant rental revenue after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
	\$ 85	\$ 88	TBD	TBD

<i>SS #1: Increase in Household Income - Min. Rent Increase/Utility Reimbursement Payment Decrease</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average earned income of households affected by this policy in dollars (increase).	Average earned income of households affected by this policy prior to implementation of the activity (in dollars).	Expected average earned income of households affected by this policy prior to implementation of the activity (in dollars).	Actual average earned income of households affected by this policy prior to implementation (in dollars).	Whether the outcome meets or exceeds the benchmark.
	TBD	1% increase	TBD	TBD

**SS #3: Increase in Positive Outcomes in Employment Status - Min. Rent Increase/URP Decrease**

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
(1) Employed Full- Time; (2) Employed Part- Time; (5) Unemployed	Head(s) of households in <<category name>> prior to implementation of the activity (number). This number may be zero.	Expected head(s) of households in <<category name>> after implementation of the activity (number).	Actual head(s) of households in <<category name>> after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
	Percentage of total work-able households in <<category name>> prior to implementation of activity (percent). This number may be zero.	Expected percentage of total work-able households in <<category name>> after implementation of the activity (percent).	Actual percentage of total work-able households in <<category name>> after implementation of the activity (percent).	Whether the outcome meets or exceeds the benchmark.
	TBD	1% increase	TBD	TBD

**SS #6: Reducing Per Unit Subsidy Costs for Participating Households - Rent Increase/URP Decrease**

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average amount of Section 8 and/or 9 subsidy per household affected by this policy in dollars (decrease).	Average subsidy per household affected by this policy prior to implementation of the activity (in dollars).	Expected average subsidy per household affected by this policy after implementation of the activity (in dollars).	Actual average subsidy per household affected by this policy after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
	TBD	1% decrease	TBD	TBD

**SS #7: Increase in Agency Rental Revenue - Min. Rent Increase/URP Decrease**

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
PHA rental revenue in dollars (increase).	PHA rental revenue prior to implementation of the activity (in dollars).	Expected PHA rental revenue after implementation of the activity (in dollars).	Actual PHA rental revenue after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
	TBD	1% increase	TBD	TBD

<b>SS #8: Households Transitioned to Self Sufficiency - Min. Rent Increase/URP Decrease</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of households transitioned to self sufficiency (increase). The PHA may create one or more definitions for "self sufficiency" to use for this metric. Each time the PHA uses this metric, the "Outcome" number should also be provided in Section (II) Operating Information in the space provided.	Households transitioned to self sufficiency (<<PHA definition of self sufficiency>>) prior to implementation of the activity (number). This number may be zero.	Expected households transitioned to self sufficiency (<<PHA definition of self-sufficiency>>) after implementation of the activity (number).	Actual households transitioned to self sufficiency (<<PHA definition of self-sufficiency>>) after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
	<b>TBD</b>	<b>1% increase</b>	<b>TBD</b>	<b>TBD</b>

### G. Give the Yearly Benchmarks for each Metric (a Numeric Value)

The table below reflects preliminary estimates.

<b>MIN. RENT INCREASE/URP DECREASE ANNUAL BENCHMARK</b>						
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>
Total Cost of Task (Processing URPs) in Dollars	\$ 518,287	\$ 414,630	\$ 259,144	\$ 103,657	\$ 25,914	\$ -
Total Time to Complete the Task (Processing URPs)	9779.0	7823.2	4889.5	1955.8	489.0	0.0
Tenant Rental Revenue in Dollars	\$ 85	\$ 88	\$ 89	\$ 94	\$ 98	\$ 102
Average earned income of zero-income households	TBD	1% increase	1.5% increase	2% increase	2% increase	2% increase
Number Employed Fulltime	TBD	1% increase	1% increase	1% increase	1% increase	1% increase
Number Employed Part Time	TBD	1% increase	1% increase	1% increase	1% increase	1% increase
Number Unemployed	TBD	1% decrease	1% decrease	1% decrease	1% decrease	1% decrease
Avg. amount of S8 and/or 9 subsidy per household	TBD	1% decrease	1% decrease	1% decrease	1% decrease	1% decrease
PHA rental revenue in dollars (increase).	TBD	1% increase	1% increase	1% increase	1% increase	1% increase
Number of households transitioned to self sufficiency.	TBD	1% increase	1% increase	1% increase	1% increase	1% increase



## H. Describe the Final Projected Outcome(s) of the MTW Activity for each Metric

The final projected outcome for each metric of this activity will be captured in HACG's Annual MTW Report.

## I. Give the Data Source from which Metric Data will be Compiled

HACG will collect data from its client tracking software, Yardi. Data collection may include supplemental information from actual finance check runs, rent roll rosters, and similar sources as collected by and reported to HACG staff during the period.

## J. Cite the Authorization(s) that Give the Flexibility to Conduct the Activity

MTW Authorization C.11 and D.2.a

## K. Explain Why the Cited Authorization(s) is/are Needed to Engage in this Activity

HACG needs **MTW Authorization C.11 and D.2.a** to modify 24 CFR §5.630 and §5.632, which regulates the minimum rent and utility reimbursement across all rental assistance programs. With approval of this activity, HACG intends to use C.11 and D.2.a to increase the minimum rent \$50 per month and reduce (or eliminate) utility reimbursement payments over the next two years. Further, HACG intends to set a reimbursement threshold to address cases where URPs remain. The threshold is set to ensure processed URPs equal or exceed the cost to process an URP check.

MTW Authorization C.11 allows HACG to **determine** family payment, including the total tenant payment, the **minimum rent, utility reimbursements**, and the tenant rent. While MTW Authorization D.2.a authorizes HACG to establish payment standards, rents or subsidy levels for tenant-based assistance to adopt and implement any reasonable policies for setting rents. HACG reasonably plans for the following rent increase schedule:

Fiscal Year	Monthly Rent	Effective Date
2018	\$50	N/A
2019	\$100	January 1, 2019
2020	\$150	July 1, 2019

Further, HACG reasonably sets the following threshold in cases where URPs remain:

<b>Fiscal Year</b>	<b>URP Threshold</b>	<b>Effective Date</b>
2018	None	Current
2019	<\$50; No URP Processed	January 1, 2019
2020	<\$75; No URP Processed	July 1, 2019

Therefore, once HACG increases the minimum rent \$50, if the difference between a family’s rental payment and their applicable utility allowance is negative (in family’s favor), then HACG will process an URP when it equals or exceeds the threshold amount listed above. Meanwhile, HACG plans to notify existing program participants of stated changes between July 1 and December 31, 2018 for a January 1, 2019 effective date. However, it is important to note that there may be instances where the threshold is implemented sooner because of an interim examination and based on the timing of the ACOP or Admin Plan update and adoption.

Without approval of this activity, HACG is faced with the continued prospect of processing negative rent and “paying” program participants to continue living in assisted communities. However, with the approval of this activity, HACG can position itself to ensure that all program participants are contributing towards their rental amount and can continue to effectively use Federal dollars to deliver housing services.

## **L. Additional Information for Rent Reform Activities**

### Impact Analysis

#### **1. Description of Rent Reform Activity**

HACG increases the minimum rent \$50 and by calculation reduce (or eliminate) URPs to achieve cost effectiveness.

#### **2. Tracking and Documenting the Implementation of the Rent Reform Activity**

HACG will track and document implementation of this rent reform activity through software applications. HACG will use FYE2018 to set a baseline of URPs processed and corresponding benchmarks for the activity. Minimum rent baseline is \$50.00.

#### **3. Identifying the Intended and Possible Unintended Impacts of the Rent Reform Activity**

##### Intended Impacts

- a. Increase in cost savings through the elimination of this process
- b. Productivity improvement among staff with this activity
- c. Encourage families to find practical, energy-efficient apartments or units where the utilities are included in the rent
- d. Ensure all program participants contribute to their portion of the rent and eliminate the number of residents being “paid” to receive housing assistance

- e. Increase awareness of site-based self-sufficiency, site-based supportive services, and Section 8 (S8) opportunities
- f. Increase the reporting accuracy of household income through the elimination of cash benefit and subsequent interaction in self-sufficiency or supportive services opportunities

#### Possible Unintended Impacts

- g. Long adjustment period for zero-income and high URP households
- h. Little to no interest/activity in searching for energy efficient units
- i. Little to no interest/activity in self-sufficiency or supportive services opportunities
- j. Increased program terminations related to utilities being off

HACG recognizes that there may be other intended and unintended impacts that HACG will address annually in its MTW Reports as well as through education of and encouragement of program participants. HACG does not intend for this rent reform activity to be administered, implemented, nor managed in a punitive manner, but instead, for the activity to assist both program participants and HACG staff in locating affordable, energy-efficient units, based on income and housing assistance, not solely on housing assistance.

#### **4. Measuring the Impacts of the Rent Reform Activity**

HACG intends to measure the impact of this rent reform activity through HUD Standard Metrics measuring cost of activity, time on activity, and rent share of tenants. Overall, HACG will measure the number of URPs processed, the amount of time taken to process the URPs, and the number of hardships requested, their outcome, and relation to the minimum rent increase.

HACG anticipates that saved staff time will become directed toward RAD conversion activities, such as new admission eligibility, existing admission compliance, trainings and certifications related to LIHTC and RAD requirements.

#### Hardship Case Criteria

HACG anticipates universally increasing the minimum rent, across all programs, on January 1, 2019. This provides a 6-month notification period of planned changes for all program participants. There may be instances where the minimum rent or URP threshold is implemented before the effective date because of the timing of the ACOP or Admin Plan update and adoption and subsequent intake and/or interim certification examinations.

Program participants presented with an undue financial burden because of the minimum rent increase must submit a written request, in duplicate (copies are acceptable), for review to their case worker (Occupancy Specialist) or Property Manager and the Resident Services Manager. Written request must include documentation of the hardship or supporting evidence of how the minimum rent increase causes an undue financial burden to the household. Proof may include current expenses related to childcare, health, transportation, and similar supporting proof.

If the request is denied or deadlocked, the family has 5 working days to submit an appeal to the appropriate program chief: Chief of Affordable Housing, Chief of Assisted Housing, or Chief of Housing Enterprise. The appropriate program chief will issue a determination, overturn, reverse, or break a deadlock decision within 5 working days. If the program chief’s determination is to deny the hardship, the family may make a file additional appeal.

This appeal should be sent to the appropriate program chief for review by a 3-person panel appointed by the CEO or appropriate designee (most likely the COO or CFO). The appeal panel will review the relevant facts, with or without a formal hearing, and will issue a decision within 10 working days. The determination of the appeal panel is deemed final and binding on both parties.

HACG may suspend the minimum rent increase during this process and/or grant other considerations on a case-by-case basis.

#### Description of Annual Re-evaluation of Rent Reform Activity

HACG will review processed URPs annually and will solicit feedback from impacted families and HACG staff to address unintended consequences of this rent reform activity.

#### Transition Period

HACG plans to universally increase the minimum rent on January 1, 2019 across all rental assistance programs according to the transition schedule outlined below:

<b>Fiscal Year</b>	<b>Minimum Rent</b>	<b>Effective Date</b>
2018	\$ 50.00	N/A
2019	\$ 100.00	January 1, 2019
2020	\$ 150.00	July 1, 2019

It is important to note that there may be instances where the minimum rent is implemented before the effective date because of the timing of the ACOP or Admin Plan update and adoption and subsequent intake and/or interim certification examinations.



In addition to increasing the minimum rent, HACG sets a URP threshold that guides the situations in which HACG will process URP checks:

<b>Fiscal Year</b>	<b>URP Threshold</b>	<b>Effective Date</b>
2018	None	Current
2019	<\$50.00; No URP	January 1, 2019
2020	<\$75.00; No URP	July 1, 2019

Again, it is important to note that there may be instances where the URP threshold is implemented before the effective date because of the timing of the ACOP or Admin Plan update and adoption and subsequent intake and/or interim certification examinations. Therefore, if the URP is below the threshold amount (\$50 or \$75), HACG will not process the URP; otherwise the URP is processed. Finally, HACG plans to notify program participants of URP changes from July 1, 2018 through December 31, 2018.

HACG anticipates that minimum rent increases, household income increases, and other factors will contribute to eliminating the issuance of URP checks by June 30, 2020. URP checks will continue under new procedures and may be modified by HACG to address oversights or other topics of concern, as families' circumstances change, documented through interim certifications throughout the year. Otherwise, existing URP families will have until their lease effective date to adjust to a life without an URP.



## 2016.03 – Project-Basing Flexibilities (*Re-Proposed*)

### A. Description of Proposed MTW Activity

HACG previously introduced this activity to house its development MTW Authorizations in anticipation of rehabilitation work needed for its public housing portfolio conversion and/or redevelopment projects. Since the activity’s approval, HUD guidance documents and/or HACG’s business model changes made some previously approved MTW Activities functionally obsolete. Nonetheless, approved MTW Authorizations, not covered under guidance documents, are still needed to complement HACG’s evolving business model and implement its Strategic Plan.

Therefore, HACG re-proposes this activity to continue tasks and “transfer” HUD-approved MTW Authorizations that will allow it to be able to continue to determine rent reasonableness and continue to certify housing at HACG-owned (direct and indirect ownership) communities. This “transfer” is consistent with HACG’s intent to centrally house MTW Authorizations consistent with its portfolio repositioning.

Currently this activity houses MTW Authorization D.1.e, which allows HACG to exceed the project-base cap<sup>10</sup> at existing multi-family sites and it eliminates, for families living in the excepted units (above the cap), the mandatory participation requirement in site-based supportive services programming at described sites. With the approval of this re-proposed activity, previous HUD-approved **MTW Authorizations D.2.c and D.5** would become housed under this activity.

Approval of this activity allows HACG to continue to improve its cost efficiency efforts by avoiding the additional costs and time delay associated with hiring third-party contractors to determine rent reasonableness or certify housing at HACG-owned-communities when HACG staff is capable and onsite to complete these activities. Because of the changes, whether through HUD guidance documents and/or HACG’s business model, HACG feels that it is important to clearly be able to continue its ability to determine rent reasonableness and continue its ability to certify housing to avoid future confusion with its approved flexibilities.

### B. Describe How Activity Will Achieve One or More of the Statutory Objectives

Currently HACG achieves **Increase Housing Choices** by exceeding the project-base cap under MTW Authorization D.1.e. Through the ability to continue to determine rent reasonableness at HACG-owned properties and the ability to continue certifying HQS on HACG-owned units, HACG will achieve **Cost Efficiency**. HACG will save approximately \$25,000. This estimate excludes re-inspections and units requiring multiple visits.

When additional visits times the third-party inspection rates are factored in, the savings is significant. The current MTW Authorization and “transferred” MTW Authorizations are important to HACG’s project-basing program

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<sup>10</sup> 25% (50% in the case of RAD) building cap

## C. Identify and Discuss the Anticipated Impact of Activity on Stated Objectives

### Positive Impact(s)

- Eliminates the need for third-party contractors to determine rent reasonableness at HACG-owned properties
- Eliminates the need for third-party contractors to certify HQS on HACG-owned units
- Preserves affordable housing options for low-income families

### Negative Impact(s)

- MTW modifications overlap programs; increases confusion and workload
- Increases HACG workforce – negate savings

## D. Anticipated Schedules for Achieving the Stated Objectives

HACG anticipates the following implementation schedule:

- Between July 1, 2018 – December 31, 2018
  - Educate and train HACG staff on all elements of activity
  - Use contracted help (and overtime as able) to certify outstanding units by **September 30, 2018**
  - Inform third-party contract inspectors of intent to terminate contracts by **December 31, 2018**
  - Evaluate current and future workload – conduct position control analysis by **December 31, 2018**
- Between January 1, 2019 – June 30, 2019
  - Full activity **implementation by April 1, 2019**
    - Exceed project-base cap at existing and newly constructed sites (existing authorization)
    - Apply adopted local process for determining rent reasonableness at HACG-owned properties
    - Continue certifying that HACG-owned housing meets HQS
    - Ensure residents moved-in after December 1, 2018 meet 2-year occupancy

## E. Standard HUD Metrics that HACG Anticipates as a Result of Activity

HACG anticipates the following Standard HUD Metrics for this activity:

- Cost Efficiency #1 – Agency Savings
- Cost Efficiency #2 – Staff Time Savings

## F. Baseline Performance Level for each Metric (Numeric Value) Prior to Implementation of MTW Activity

The tables below reflect preliminary data, as of December 31, 2017. HACG will use FYE2018 to collect data to set the final baseline and benchmarks for this activity.

<i>CE #1: Agency Cost Savings - Project-Basing Flexibilities</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	Cost of task prior to implementation of the activity (in dollars).	Expected cost of task after implementation of the activity (in dollars).	Actual cost of task after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
	\$ 147,885	\$ 188,456	TBD	TBD

<i>CE #2: Staff Time Savings - Project-Basing Flexibilities</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	Total amount of staff time dedicated to the task prior to implementation of the activity (in hours).	Expected amount of total staff time dedicated to the task after implementation of the activity (in hours).	Actual amount of total staff time dedicated to the task after implementation of the activity (in hours).	Whether the outcome meets or exceeds the benchmark.
	6239.7	6219.7	TBD	TBD

## G. Give the Yearly Benchmarks for each Metric (a Numeric Value)

The table below reflects preliminary estimates.

<i>PROJECT-BASING FLEXIBILITIES ANNUAL BENCHMARK</i>						
Unit of Measurement	Baseline	2019	2020	2021	2022	2023
Total cost of task in dollars (decrease).	\$ 147,885	\$ 188,456	\$ 203,372	\$ 196,278	\$ 211,277	\$ 166,828
Total time to complete the task in staff hours (decrease).	6239.7	6219.7	6588.0	6239.0	6588.0	5050.8
Number of households at or below 80% AMI that would lose assistance or need to move (decrease).	2260	1808	1446	1157	926	741

## H. Describe the Final Projected Outcome(s) of the MTW Activity for each Metric

The final projected outcome for each metric of this activity will be captured in HACG's Annual MTW Report.

## I. Give the Data Source from which Metric Data will be Compiled

HACG will collect data from its client tracking software, Yardi. Data collection may include supplemental information as collected by and reported to HACG staff during the period.

## J. Cite the Authorization(s) that Give the Flexibility to Conduct the Activity

MTW Authorizations D.2.c and D.5

## K. Explain Why the Cited Authorization(s) is/are Needed to Engage in this Activity

HACG needs **MTW Authorization D.2.c and D.5** to continue its ability to modify 24 CFR §982.507 and 24 CFR §982 Subpart I to be able to continue to determine rent reasonableness and conduct HQS certifications at and on HACG-owned (direct and indirect) communities and units.

With approval of this re-proposed activity, HACG intends to continue to use D.2.c and D.5, as it has in the past, to eliminate the need for third-party contractors, program-wide, at and on HACG-owned (direct and indirect) properties and units.

Without approval of this activity, HACG is faced with the bleak proposition of negating cost savings achieved to date and potentially increasing its contract staff and/or regular workforce to meet workload demands at HACG-owned PBV sites. The prospect of relinquishing these MTW Authorizations adds expenses and negates the goal of streamlining costs associated with converting PH units to PBV units under RAD.

#### **L. Additional Information for Rent Reform Activities**

This activity does not meet the definition of a Rent Reform Activity.





## **2018.02 – Over-House 1-Bedroom Eligible Families in 2-Bedroom Units (*Re-proposed and Re-named*)**

### **2018.02 – Site-Based Housing Flexibility (*formerly Over-House 1-Bedroom Families in 2-Bedroom Units*)**

#### **A. Description of Proposed MTW Activity**

HACG re-proposes this activity to expand its purview and to aptly re-name the activity. Initially HACG proposed this activity to effectively improve cost efficiency and increase housing choices by over-housing eligible, smaller-sized families at a specific site. HACG was granted a full portfolio award to convert its public housing (PH) units under the Rental Assistance Demonstration (RAD). HACG elected to convert its PH units to Section 8 (S8) assisted project-based voucher (PBV) units. During the conversion process, HACG realized unanticipated, unaddressed consequences, similar to elements addressed by the initial activity: 1) low number of families returning to converted sites and 2) low number of large, eligible, qualified Wait List families to occupy large units. These factors create an inefficient use of Federal dollars and decreases housing choice for low-income families because they are not “appropriate-sized” families for the vacant units.

Therefore, HACG re-proposes this activity to extend the application of this activity to all non-Public Housing site-based housing communities. HACG intends to use **MTW Authorizations D.1.b and D.2.b** of the Amended and Restated MTW Agreement to accomplish the following activities:

- Over-house eligible, qualified low-income families in larger bedroom units at HACG and HACG affiliated communities until an appropriate sized family becomes available to occupy the over-housed unit
- Provide gap payment assistance to the landlord for the rent difference between the assigned unit size and the eligible family’s income means and/or voucher amount up to 120% of the Fair Market Rent (FMR) of the assigned bedroom unit at defined sites until an appropriate sized family becomes available to occupy that assisted unit

HACG will consider written hardship requests on a case-by-case basis in accordance with its Hardship Policy.

#### **B. Describe How Activity Will Achieve One or More of the Statutory Objectives**

This activity achieves Cost Effectiveness by deliberately offering unoccupied, large units to smaller, eligible, qualified families with limited housing options and limited resources. Getting families into units reduces potential homeless cases, reduces vandalism and trespass violations, and similar vagrancy issues associated with unoccupied units on multi-family properties nationwide, while reducing holding costs.

Also, in the cases at the original site, over-housing families eliminates the expensive proposition of refitting 2-bedroom units to meet 1-bedroom unit requirement needs and facing the proposition of undoing the unit refit to meet 2-bedroom requirement needs later.

The approval of this activity achieves **Increase Housing Choices** for families by reducing the wait time for low-income families and introducing these families to modern, energy-efficient, high-quality affordable housing options that are not always accessible in the private market to this segment of the population.

### **C. Identify and Discuss the Anticipated Impact of Activity on Stated Objectives**

#### Positive Impact(s)

- Reduces Wait List time for families with limited options and limited resources
- Improves Cost Efficiency of operating housing programs
- Increases Housing Choices of low-income families with limited options
- Reduces potential homelessness through assignment of a larger unit
- Promotes a sense of community – strengthens financial and social stability
- Preserves affordable housing options for low-income families
- Promotes family stabilization through assignment of affordable housing
- Reduces carrying and holding costs through unit occupancy
- Introduces low-income families to practical, energy-efficient apartments that may not otherwise be accessible to families in this socio-economic group

#### Negative Impact(s)

- Families do not take advantage of site-based self-sufficiency or site-based supportive services opportunities
- Incumbent families refuse to move once an appropriate sized family becomes available
- An appropriate sized family does become available, but right-size unit is unavailable for incumbent family to “transfer” into
- Families refuse larger unit offerings because of “transfer-out” requirement – prolonged HACG holding costs

## **D. Anticipated Schedules for Achieving the Stated Objectives**

HACG anticipates the following implementation schedule:

- Between July 1, 2018 – December 31, 2018
  - Update Admin Plan to include activity elements applicable to PBV sites
  - Educate and train HACG staff on activity elements applicable to PBV sites
  - Develop/update “transfer form” that spells out conditions of over-housing flexibility
    - Over-housing is offered until an appropriate sized family becomes available to occupy that unit
    - Gap payment assistance is offered until an appropriate sized family becomes available to occupy that unit
    - Once appropriate sized family and right-size unit becomes available that meets the accommodation needs of the incumbent family, HACG will issue a 30-day notice<sup>11</sup> in accordance with the “transfer form” for the incumbent family to move/transfer to another unit
  - Offer larger units to smaller, eligible, qualified families post Admin Plan approval
- Between January 1, 2019 – June 30, 2019
  - Offer larger units to smaller, eligible, qualified families post Admin Plan approval
  - Identify over-housed units to cross-reference with current Wait List for activity compliance
  - HACG anticipates full implementation of this activity on **January 1, 2019**

## **E. Standard HUD Metrics that HACG Anticipates as a Result of Activity**

HACG anticipates the following Standard HUD Metrics for this activity:

- Housing Choice #4 – Displacement Prevention
- Housing Choice #5 – Increase in Resident Mobility

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<sup>11</sup> The 30-day notice meets the local and state law minimum lease termination standard

## F. Baseline Performance Level for each Metric (Numeric Value) Prior to Implementation of MTW Activity

The tables below reflect preliminary data, as of December 31, 2017. HACG will use FYE2018 to collect data to set the final baseline and benchmarks for this activity.

<i>HC #4: Displacement Prevention - Site-Based Housing Flexibility</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households at or below 80% AMI that would lose assistance or need to move (decrease). If units reach a specific type of household, give that type in this box.	Households losing assistance/moving prior to implementation of the activity (number).	Expected households losing assistance/moving after implementation of the activity (number).	Actual households losing assistance/moving after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
	2260	1808	TBD	TBD

<i>HC #5: Increase in Resident Mobility - Site-Based Housing Flexibility</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households able to move to a better unit and/or neighborhood of opportunity as a result of the activity (increase).	Households able to move to a better unit and/or neighborhood of opportunity prior to implementation of the activity (number). This number may be zero.	Expected households able to move to a better unit and/or neighborhood of opportunity after implementation of the activity (number).	Actual increase in households able to move to a better unit and/or neighborhood of opportunity after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
	192	230	TBD	TBD

## G. Give the Yearly Benchmarks for each Metric (a Numeric Value)

The table below reflects preliminary estimates.

<i>SITE-BASED HOUSING FLEXIBILITY ANNUAL BENCHMARK</i>						
Unit of Measurement	Baseline	2019	2020	2021	2022	2023
Number of households at or below 80% AMI that would lose assistance or need to move (decrease).	2260	1808	1446	1157	926	741
Number of households able to move to a better unit and/or neighborhood of opportunity as a result of the activity (increase).	192	230	276	332	398	478

## H. Describe the Final Projected Outcome(s) of the MTW Activity for each Metric

The final projected outcome for each metric of this activity will be captured in HACG's Annual MTW Report.

## I. Give the Data Source from which Metric Data will be Compiled

HACG will collect data from its client tracking software, Yardi. Data collection may include supplemental information from actual lease-ups, rent roll rosters, and similar sources as collected by and reported to HACG staff during the period.

## J. Cite the Authorization(s) that Give the Flexibility to Conduct the Activity

MTW Authorizations D.1.b, D.2.b

## K. Explain Why the Cited Authorization(s) is/are Needed to Engage in this Activity

HACG needs **MTW Authorizations D.1.b and D.2.b** to modify 24 CFR §982 Subpart E and/or §983 Subpart E, which regulates filling vacant units and occupancy under the Housing Choice Voucher (**HCV**) Program.

With approval of this activity, HACG intends to use D.1.b to conditionally offer larger units at PBV sites to smaller families off the Wait List that are otherwise eligible and qualified for rental assistance by current requirements. Under this activity, smaller families are assigned to larger units until an appropriate-sized family becomes available to occupy that unit.

MTW Authorization D.1.b allows HACG to modify 24 CFR §983 Subpart F – Occupancy as necessary to implement its Annual MTW Plan. The table on the next page provides an illustrated example of HACG's intentions:



Wait List/Actual Family Size	Offered Bedroom Size
1	2
2	3
3	4
4	5
>=5	5 (max BR size in HACG's portfolio)

Further, HACG intends to use D.2.b to conditionally provide gap payment assistance to the landlord. Gap payment assistance will be provided on behalf of the over-housed family until an appropriate-sized family becomes available to occupy that unit. The assistance will cover the rental difference between the family's voucher up to 120% of the FMR.

MTW Authorization D.2.b allows HACG to modify 24 CFR §983.201 and other regulation elements, such as 24 CFR §983.202(b), Purpose of Contract, since HACG converted its PH units to S8 assisted PBV units. D.2.b also allows HACG to modify 24 CFR §983 Subpart E – HAP Contract as necessary to implement its Annual MTW Plan.

A substantial commitment of Federal and private dollars has been invested at HACG's PBV sites. It is important to give existing and future sites every opportunity to perform financially and socially. Without the approval of this activity, low-income families, with limited housing options and limited resources, are faced with the bleak prospect of choosing sub-standard housing in line with their budget or choosing privately-owned housing, usually, above their budgetary means. While the approval of this activity alleviates those bleak choices, potentially saves Wait List families from a bout with homelessness, reduces the frequency of HACG performing excessive move-in, move-out procedures, while reducing the risk of HACG losing tax credits, and/or similar typed losses impacting low-income housing programs and/or services.

#### **L. Additional Information for Rent Reform Activities**

This activity does not meet the definition of a Rent Reform Activity.

## IV. APPROVED MTW ACTIVITIES

### A. Implemented Activities

Activity #	Activity Name	MTW Authorization	PY*Approved	PY* Implemented
2014.02	Innovations to Reduce Homelessness	D.2.a D.2.b D.4	2014	2014
2014.03	Administrative Reforms	D.3.a D.3.b	2014	2014
2014.04	Administrative Efficiencies	D.1.c	2014	2014
2015.02	Portability Restrictions	D.1.g	2015	2016
2015.03	Simplify Utility Allowance (UA) Calculations	D.2.a	2015	2015 2016
2015.04	Cap Childcare Deductions	C.11 D.2.a	2015	2015
2016.01	Next Step Vouchers (NSV)	D.2.d D.3.a D.3.b D.4	2016	2018
2016.02	Non-Competitive Project-Basing Process	D.7.a	2016	2018

\*PY = Plan Year

**2014.02 – Innovations to Reduce Homelessness**

HACG uses MTW Authorizations D.2.a, D.2.b, and D.4 of the Amended and Restated MTW Agreement to modify applicable rules and regulations as necessary to learn if housing chronically homeless families significantly influences stability of these families. Also, HACG is interested to learn if housing stability positively impacts household income, earned income, and other socio-economic categories.

The activity supports a Tiered Rent Schedule, minimum rent waiver, selection preference, and 150 tenant-based voucher (TBVs) commitment to this effort. Vouchers under this activity are not portable and are re-purposed to the activity through attrition. HACG entered into a Sub-Grantee Agreement with Columbus State University (CSU) to oversee the evaluation process and analyze the results.

Activity metrics are being tracked and reported on in HACG’s Annual MTW Report. Since tenancy and income growth dominate the elements being measured, HACG briefly charts the length of time and income for this activity below:

<b>INNOVATIONS TO REDUCE HOMELESSNESS FAMILIES</b>				
<b>Fiscal Year End</b>	<b>Families Housed</b>	<b>Average Tenancy (Yrs)</b>	<b>Household Income (Avg.)</b>	<b>% Earned Income</b>
2014	28	0.3	\$ 7,308	42%
2015	71	0.6	\$ 6,840	40%
2016	106	1.1	\$ 8,281	45%
2017	104	1.7	\$ 8,568	43%
2018^	104	2.1	\$ 8,505	53%

*^As of December 31, 2017*

HACG anticipates the following for **Innovations to Reduce Homelessness** in FYE2019:

- No non-significant changes to this activity
- No modifications to the metrics during the period
- No additional or deleted authorizations are needed to implement this activity than originally proposed
- No significant changes to this activity

### **2014.03 – Administrative Reforms (HCV Only)**

HACG uses MTW Authorizations D.3.a, and D.3.b of the Amended and Restated MTW Agreement to modify applicable rules and regulations as necessary to streamline the rent calculation process and increase housing choices for program participants.

The activity supports the creation of forms necessary to self-certify assets at the local level. Self-certification of assets is permitted after the initial verification. Assets are subject to random verification. Additionally, this activity allows families to use more of their income (up to 50%) towards their rental amount. Finally, other form creations necessary to administer this activity at the local level are authorized by the activity.

Activity metrics are being tracked and reported on in HACG's Annual MTW Report. Originally, this activity included public housing (PH) elements, which are obsolete because of HACG's Commitment to enter into a Housing Assistance Payment (CHAP) contract and its use of Low-Income Housing Tax Credit (LIHTC) funds. The CHAP award authorizes HACG to convert its PH housing stock to long-term Section 8 assisted project-based voucher (PBV) units under the Rental Assistance Demonstration (RAD) Program and HACG elected to use LIHTC funds to meet DCA and/or RAD requirements.

HACG initiated procedures to close-out the PH elements in its 2017 Annual MTW Report. HACG did not identify any PH residents meeting or exceeding the \$50,000 asset threshold.

HACG anticipates the following for **Administrative Reforms** in FYE2019:

- No non-significant changes to this activity
- No modifications to the metrics during the period
- No additional or deleted authorizations are needed to implement this activity than originally proposed
- No significant changes to this activity

### **2014.04 – Administrative Efficiencies (HCV Only)**

HACG uses MTW Authorization D.1.c of the Amended and Restated MTW Agreement to modify applicable rules and regulations as necessary to create and/or modify existing forms necessary to streamline the annual certification process.

The activity allows HACG to place eligible program participants on a triennial examination schedule. Eligibility is based on the head-of-household's (HoH) status **AND** the household income source(s). HoH eligibility is defined below:

- HoH must be categorized as one of the following classifications below:

→ <i>Disabled</i>	→ <i>Elderly</i>
→ <i>Elderly &amp; Disabled; <b>OR</b></i>	→ <i>Classification as defined by HACG</i>

- HoH classification is the identifying definition
- Other classifications do not factor into eligibility
- Household income must meet fixed, stable income definition:

<i>Civil Service Annuity</i>	<i>Pension</i>	<i>Private Pension</i>	<i>Social Security</i>
<i>Social Security Disability Insurance</i>	<i>Social Security Insurance</i>	<i>Veteran Affairs Benefits</i>	<i>Other Fixed Income defined by HACG</i>

- Households receiving *income from any other source(s) certify their eligibility annually*, even if the HoH is receiving income from a fixed source. Examples of other income sources that require annual certification:

<i>Child Support</i>	<i>PHA Wage</i>	<i>Imputed Welfare</i>	<i>Other Wage Sources</i>
<i>Self-Employment</i>	<i>Temporary Aid to Needy Families (TANF)</i>	<i>Unemployment</i>	<i>Other Income Sources defined by HACG</i>

Activity metrics are being tracked and reported on in HACG’s Annual MTW Report. Originally, this activity included public housing (PH) elements, which have become functionally obsolete because of HACG’s decision to use Low-Income Housing Tax Credit (LIHTC) funds. The use LIHTC funds require calculation of all income sources.

Meanwhile, HACG continues to conduct “mini-interims” on off-year program participants to reduce “sticker shock” related to rent changes 3-years later. “Mini-interim” results are gained from factoring income, utility allowance, and other adjustments. HACG also continues to conduct full certification examinations during participants scheduled triennial period.



HACG anticipates the following for the **Administrative Efficiencies Activity** in FYE2019:

- No non-significant changes to this activity
- No modifications to the metrics during the period
- No additional or deleted authorizations are needed to implement this activity than originally proposed
- No significant changes to this activity

### **2015.02 – Portability Restrictions**

HACG uses MTW Authorizations D.1.g of the Amended and Restated MTW Agreement to modify applicable rules and regulations as necessary to restrict the movement of vouchers into and out of HACG's service jurisdiction. Voucher movement is limited to verifiable employment related reasons. Verifiable employment *may* include the following:

- A letter of intent to employ (job offer letter), reassign, transfer, and similar
- Permanent Change of Station (PCS) orders, transfer orders, and similar
- Document, on company stationery, which will assist HACG in deciding the acceptance or approval of vouchers into or out of Columbus, GA
- **Families *may* lose their rental assistance if a loss of employment occurs** at the new location (whether port-in or port-out) **within the first six-months** or before agency absorption occurs

Hardship requests are reviewed on a case-by-case basis in accordance with HACG's Hardship Policy. HACG will grant ports in cases of Violence Against Women Act (VAWA) and to meet reasonable accommodations.

Activity metrics are being tracked and reported on in HACG's Annual MTW Report. The agency used FYE2015 to approve or deny pending ports into and out of Columbus. HACG fully implemented this activity in FYE2016. Since that time, HACG has not received any hardship requests.

HACG anticipates the following for **Portability Restrictions** in FYE2019:

- No non-significant changes to this activity
- No modifications to the metrics during the period
- No additional or deleted authorizations are needed to implement this activity than originally proposed
- No significant changes to this activity

## **2015.03 – Simplify Utility Allowance Calculation(s)**

HACG uses MTW Authorizations D.2.a of the Amended and Restated MTW Agreement to modify applicable rules and regulations as necessary to streamline the rental calculation process. This activity supports the simplification of HACG’s Utility Allowance (UA) Schedules used throughout its rental assistance portfolio.

In response to HACG’s dynamic portfolio and the confusion created through the constant re-calculation of rental amounts based on unit utilities, HACG petitioned to simplify UA Options across its rental portfolio. The calculation process is based on who pays the utilities, the resident or the landlord, and factors in program-to reference the appropriate UA Schedule (shown on the next page):

<b>SIMPLIFIED UTILITY ALLOWANCE SCHEDULES</b>		
<b>Program</b>	<b>UA Schedule</b>	<b>Unit Application (est.*)</b>
HCV PBV and TBV	Simplified UA Schedule	2323
PH and RAD PBV	Public Housing UA Schedule	1344
Assisted Units (Mixed-Income Sites)	LIHTC UA Schedule (current utility study)	400

*\*As of December 31, 2017*

Activity metrics are being tracked and reported on in HACG’s Annual MTW Report. The agency actively uses the UA Schedules and transitions schedules between programs because of PH conversion activities to Section 8 assistance under RAD.

HACG anticipates the following for **Simplified Utility Allowance (UA) Calculation** in FYE2019:

- No non-significant changes to this activity
- No modifications to the metrics during the period
- No additional or deleted authorizations are needed to implement this activity than originally proposed
- No significant changes to this activity

## **2015.04 – Cap Childcare Dependent Deduction**

HACG uses MTW Authorizations C.11 and D.2.a of the Amended and Restated MTW Agreement to modify applicable rules and regulations as necessary to limit the amount of childcare deduction able to be taken by program participants.

This activity allows HACG to place a cap on childcare deductions in line with the Georgia Childcare and Parent Services (GA **CAPS**) reimbursement amounts. CAPS help low-income families afford safe, quality, childcare by subsidizing childcare costs for children under the age of 13<sup>12</sup>.

Childcare costs that exceed CAPS reimbursement amounts are reduced to categorical maximum amounts filtered by age. Hardship requests are addressed on a case-by-case basis in accordance with the Hardship Policy.

Activity metrics are being tracked and reported on in HACG's Annual MTW Report. The agency did not change any other portion of the process beyond establishing a cap. Families continue to furnish proof of their out-of-pocket childcare expenses and HACG staff simply verify that provided costs are in line with GA CAPS, based on child's age and service provider. HACG's rental assistance departments are charged with maintaining an updated CAPS chart since the departments use the chart to factor into the rent calculation.

HACG anticipates the following for **Cap Childcare Deductions** in FYE2019:

- No non-significant changes to this activity
- No modifications to the metrics during the period
- No additional or deleted authorizations are needed to implement this activity than originally proposed
- No significant changes to this activity

## **2016.01 – Next Step Vouchers (NSV)**

HACG uses MTW Authorizations D.2.d, D.3.a, D.3.b, and D.4 of the Amended and Restated MTW Agreement to modify applicable rules and regulations as necessary to dedicate up to 10 tenant-based vouchers (**TBVs**) for clients of the Georgia Department of Health and Human Services (GA **DHHS**), Division of Family and Children Services (**DFCS**) office.

This activity serves as a homelessness prevention tool for youth aging out of Foster Care. Issuances are conditional and bulleted on the next page:

- Foster youth must begin, continue, and/or maintain appointments and case management visits with social service providers as prescribed by their case manager
- Vouchers expire in 36 months or age 23, whichever comes first
- Foster youth must meet 20-hour/week work requirement
  - Work an average of 20-hours per week; **and/or**
  - Attend school an average of 20-hours per week; **and/or**

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<sup>12</sup> Childcare care be extended beyond 13 if the child has special needs

- Attend job training course an average of 20-hours per week

Activity metrics are being tracked and reported on in HACG's Annual MTW Report. Foster youth are required to exhaust DFCS resources first before being issued a NSV. The primary intent is to ensure Foster Youth are stabilized and ready to receive a TBV, where they are living on their own with regular guidance before living on their own without any guidance.

HACG anticipates the following for **Next Step Vouchers** in FYE2019:

- No non-significant changes to this activity
- No modifications to the metrics during the period
- No additional or deleted authorizations are needed to implement this activity than originally proposed
- No significant changes to this activity

### **2016.02 – Non-Competitive Project-Basing Process**

HACG uses MTW Authorizations D.7.a of the Amended and Restated MTW Agreement to modify applicable rules and regulations as necessary to project-base Section 8 Rental Assistance at HACG-owned (direct & indirect ownership) properties without competition.

Under this activity, HACG implemented plans to project-base assistance at properties it redeveloped, such as Booker T. Washington (**BTW**) I, known as Patriot Pointe, and BTW II, known as Columbus Commons. HACG will also use this activity for newly constructed housing and substantially rehabilitated properties to receive subsidy.

Activity metrics are being tracked and reported on in HACG's Annual MTW Report. HACG will apply activity elements to convert the 55 PH units at Patriot Pointe and Columbus Commons once HACG completes its ongoing RAD conversion projects.

HACG anticipates the following for **Non-Competitive Project-Basing Process** in FYE2019:

- No non-significant changes to this activity
- No modifications to the metrics during the period
- No additional or deleted authorizations are needed to implement this activity than originally proposed
- No significant changes to this activity

### **2016.03 – Project-Basing Flexibilities**

This activity includes significant changes and is being **re-proposed on page 37**.

## **B. Not Yet Implemented Activities**

MTW Activity **2018.01 – Eliminate/Reduce Interim Certification Examinations** was approved in HACG's 2018 Annual MTW Plan. This activity eliminates interim certification examinations for families that only report Contribution Income. The activity reduces all other families to one interim for the year. Family composition changes are noted in the file and final



adjustments take place during the annual recertification examination or during the interim certification examination (should eligible families choose that option).

Hardships for this activity are considered by HACG on a case-by-case basis in accordance with items listed in element L of the 2018 Annual MTW Plan.

As of this writing, this activity was not implemented. HACG has initiated process steps to fully implement this activity. Steps include: 1) updating the Admissions and Continued Occupancy Plan (**ACOP**) and Administrative Plan (**Admin Plan**) as applicable, 2) placing the document out for public comments, 3) getting the documents adopted by HACG's Board of Commissioners (**BoC**) (spring 2018 adoption), 4) getting HACG staff educated and trained on the elements of this activity, and other steps necessary to fully implement this activity.

Based on the process steps enumerated above, HACG anticipates fully implementing this activity on July 1, 2018 (Fiscal Year End (**FYE**) 2019). HACG did not make any non-significant changes nor modifications to activity **Eliminate/Reduce Interim Certification Examinations** since it was approved July 2017.

MTW Activity **2018.02 – Over-House 1-Bedroom Eligible Families in 2-Bedroom Units** was approved in HACG's 2018 Annual MTW Plan.

This activity includes significant changes and is being **re-proposed and re-named** (*Site-Based Housing Flexibility*) **on page 42**.

### **C. Activities on Hold**

HACG does not have any activities on hold



## D. Closed-Out Activities

Activity #	Activity Name	MTW Authorization	PY* Approved	PY* Implemented	Close-Out Year
2014.01	Community Choice	D.2.a D.2.b	2015	2015	2019
2014.05	Streamline Housing Quality Standards (HQS) Inspection	D.5 ("transferred" to 2016.03)	2014	2015	2017
2014.06	Rent Reform (Farley)	C.4	2014	2014	2018
2015.01	Eliminate Child Support Income from Rent Calculation	C.11	2015	2015	2017

\*PY = Plan Year

HACG closes out MTW Activity **2014.01 – Community Choice** approved in HACG’s 2015 Annual MTW Plan and fully implemented in the same fiscal year. HACG closes out this activity because the evaluation period is complete. Columbus State University (CSU), contracted to evaluate MTW Activities, will provide an evaluation report of its findings. HACG will incorporate portions of CSU’s report into its Annual MTW Report to display final close-out data.

HACG initiates the close-out process in its **2018 Annual MTW Report**.

HACG closes out MTW Activity **2014.05 – Streamline Housing Quality Standards (HQS) Inspection** approved in HACG’s 2014 Annual MTW Plan and fully implemented in HACG’s 2015 Annual MTW Plan. Notice PIH 2016-05 (HA) authorizes all Public Housing Authorities (PHAs) to conduct biennial HQS inspections, to adopt an alternative inspections method for HOME and LIHTC funded units, and to collect a fee for return inspection visits, which makes this activity functionally obsolete.

To ensure that HACG retains its ability to continue to conduct HQS inspections on HACG-owned (direct and indirect) units and continue to determine rent reasonableness at HACG-owned (direct and indirect) properties, HACG “transferred” related MTW Authorizations to MTW Activity 2016.03 – Project-Basing Flexibilities (see page 51).

HACG completes the close-out<sup>13</sup> process in its **2018 Annual MTW Report**.

<sup>13</sup> HACG initiated the close-out of this MTW Activity in 2017

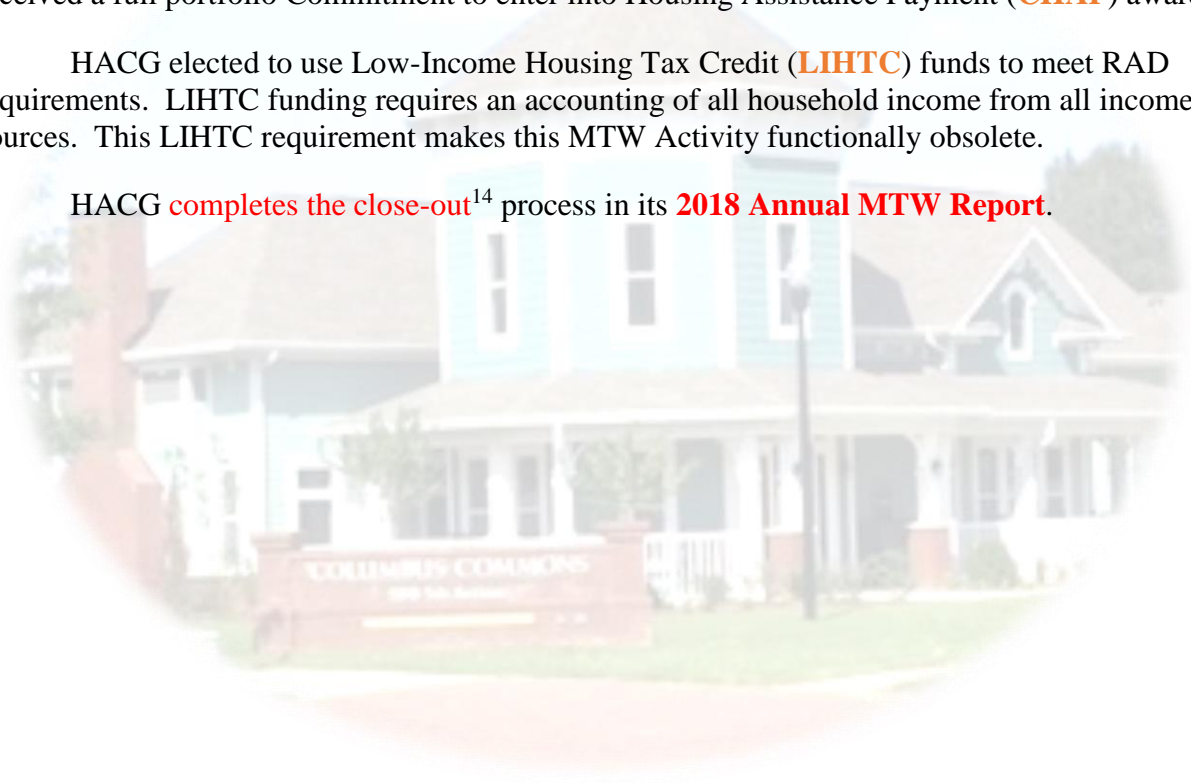
HACG closes out MTW Activity **2014.06 – Rent Reform (Farley)** approved in HACG’s 2014 Annual MTW Plan and implemented during fiscal year 2014. HACG closes out this activity because the evaluation period is complete. Columbus State University (CSU), contracted to evaluate MTW Activities, will provide an evaluation report of its findings. HACG will incorporate portions of CSU’s report into its Annual MTW Report to display final close-out data.

HACG **initiates the close-out** process in its **2018 Annual MTW Report**.

HACG closes out MTW Activity **2015.01 – Eliminate Child Support Income from Rent Calculation (PH only)** approved in HACG’s 2015 Annual MTW Plan and partially implemented in HACG’s 2015 and 2016 Annual MTW Plans. HACG closes out this activity because HACG received a full portfolio Commitment to enter into Housing Assistance Payment (**CHAP**) award.

HACG elected to use Low-Income Housing Tax Credit (**LIHTC**) funds to meet RAD requirements. LIHTC funding requires an accounting of all household income from all income sources. This LIHTC requirement makes this MTW Activity functionally obsolete.

HACG **completes the close-out**<sup>14</sup> process in its **2018 Annual MTW Report**.



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<sup>14</sup> HACG initiated the close-out of this MTW Activity in 2017

## V. MTW SOURCES AND USES OF FUNDS

### A. MTW Plan: Sources and Uses of MTW Funds

The table below reflects HACG's FYE2018 adopted budget. HACG's budgeting process begins in March and HACG anticipates a 2019 budget presented to the Board of Commissioners for adoption May 2018.

A. MTW Plan: Sources and Uses of MTW Funds		
Estimated Sources of MTW Funding for the Fiscal Year		
PHAs shall provide the estimated sources and amounts of MTW funding by FDS line item.		
Sources		
FDS Line Item	FDS Line Item Name	Dollar Amount
70500 (70300+70400)	Total Tenant Revenue	\$ 874,010.00
70600	HUD PHA Operating Grants	\$ 21,419,974.00
70610	Capital Grants	\$ 2,339,549.00
70700 (70710+70720+70730+70740+70750)	Total Fee Revenue	\$ -
71100+72000	Interest Income	\$ 5,223.00
71600	Gain or Loss on Sale of Capital Assets	\$ -
71200+71300+71310+71400+71500	Other Income	\$ 122,954.00
<b>70000</b>	<b>Total Revenue</b>	<b>\$ 24,761,710.00</b>

*\*Unaudited*

**Estimated Uses of MTW Funding for the Fiscal Year**

PHAs shall provide the estimated uses and amounts of MTW spending by FDS line item.

Uses		
FDS Line Item	FDS Line Item Name	Dollar Amount
91000 (91100+91200+91400+91500+91600+91700+91800+91900)	Total Operating - Administrative	\$ 2,106,520.00
91300+91310+92000	Management Fee Expense	\$ 993,974.00
91810	Allocated Overhead	\$ -
92500 (92100+92200+92300+92400)	Total Tenant Services	\$ 68,532.00
93000 (93100+93600+93200+93300+93400+93800)	Total Utilities	\$ 370,370.00
93500+93700	Labor	\$ -
94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	\$ 1,155,933.00
95000 (95100+95200+95300+95500)	Total Protective Services	\$ 10,000.00
96100 (96110+96120+96130+96140)	Total insurance Premiums	\$ 291,023.00
96000 (96200+96210+96300+96400+96500+96600+96800)	Total Other General Expenses	\$ 122,246.00
96700 (96710+96720+96730)	Total Interest Expense and Amortization Cost	\$ -
97100+97200	Total Extraordinary Maintenance	\$ -
97300+97350	Housing Assistance Payments + HAP Portability-In	\$ 18,538,112.00
97400	Depreciation Expense	\$ 875,000.00
97500+97600+97700+97800	All Other Expenses	\$ 230,000.00
<b>90000</b>	<b>Total Expenses</b>	<b>\$ 24,761,710.00</b>

**Describe the Activities that Will Use Only MTW Single Fund Flexibility**

HACG uses the MTW Single-Fund flexibility to combine its funding sources to form the MTW Block Grant that will be used to administer current and future MTW Activities: HACG S8 Project-Based Program, Portfolio-wide Housing Flexibility, Eliminate/Reduce URPs, Over-House 1-BR Families in 2-BR Units, Eliminate/Reduce Interim Certification Examinations, Project-Basing Flexibilities, Next Step Vouchers, Cap Childcare Deductions, Simplified Utility Allowance Calculations, Rent Reform, Administrative Efficiency, Administrative Reforms, Innovations to Reduce Homelessness, and Community Choice as described in either Section III - Proposed MTW Activities, and/or Section IV - Approved MTW Activities.

\*Unaudited

## B. Local Asset Management Plan (LAMP)

B. MTW Plan: Local Asset Management Plan	
Is the PHA allocating costs within statute?	<input checked="" type="checkbox"/> Yes or <input type="checkbox"/>
Is the PHA implementing a local asset management plan (LAMP)?	<input type="checkbox"/> or <input checked="" type="checkbox"/> No
If the PHA is implementing a LAMP, it shall be described in an appendix every year beginning with the year it is proposed and approved. The narrative shall explain the deviations from existing HUD requirements and should be updated if any changes are made to the LAMP.	
Has the PHA provided a LAMP in the appendix?	<input type="checkbox"/> or <input checked="" type="checkbox"/> No
<input type="checkbox"/> N/A	





## VI. ADMINISTRATIVE

### A. Resolution to Adopting the Annual MTW Plan

The resolution adopting HACG's Annual MTW Plan is included under the Attachments Section of this document. HACG's Board of Commissioners adopted Resolution 3298 at its March 21, 2018 board meeting.

### B. Beginning and Ending Dates of Plan's Availability for Public Review

HACG's Annual MTW Plan is made **available to the public** for review and comments from **January 26, 2018 through February 25, 2018** at the following locations:

- **Columbus Public Library**, 3000 Macon Road
  - 2<sup>nd</sup> floor reference desk, **Government Documents** Section
- **HACG's Administrative Offices**
  - **Central Office**, 1000 Wynnton Road, **Front Desk**
  - **Site Rental Offices**, various addresses citywide, **Front Desk**
  - **Tenant Selection Office**, 1180 Dr. Martin Luther King, Jr. Blvd., **Front Desk**
- **HACG's website**, [www.columbushousing.org](http://www.columbushousing.org)
  - Contact Lisa Walters, [lwalters@columbushousing.org](mailto:lwalters@columbushousing.org), with Plan comments
- HACG advertised all Public Hearings and Public Meetings in accordance with the Annual MTW Plan guidelines. General and specific invitations were sent throughout the community. The hearings and meetings on the Annual MTW Plan were held as follows:**2 Public Hearings on February 13** at HACG's administrative offices. There were **22 attendees**
- **1 Public Meeting on February 21** at Warren Williams' Community Room. There were **25 attendees**
- **1 Public Meeting on March 21**, before the HACG Board Meeting, at HACG's administrative offices. There were **0 general public attendees**

**Comments received prior to March 3, 2018 are included in the Plan**

## **C. Description of any Planned or Ongoing Agency Directed Evaluations of the Demonstration**

In accordance with Attachment D of HACG's MTW Agreement, HACG introduced activities that address Legacy and Community Specific Authorizations: Rent Reform Controlled Study and Housing Choice Mobility Demonstration.

HACG entered into a Sub-Grantee Agreement with Columbus State University (**CSU**) to evaluate its obligated MTW activities (below). Under its Legacy and Community Specific obligations, HACG introduced the following MTW activities:

- ✓ 2014.01 – Community Choice (approved FYE2015)
- ✓ 2014.02 – Innovations to Reduce Homelessness (FYE2014)
- ✓ 2014.06 – Rent Reform (Farley) (FYE2014)
- ✓ 2016.01 – Next Step Vouchers

The agreement terminates August 2018<sup>15</sup>. CSU is contracted to provide the following:

- Evaluate HUD-approved MTW activities listed above
  - CSU collects data through the administration of annual surveys
  - CSU collects data, as provided by HACG, from HACG's client tracking software
- CSU provides an annual report to HACG by August 15
  - Report is to include qualitative and quantitative results of activities
    - Survey data, moving patterns, rent/income variance,
    - Remain on same timetable with other activities as possible

An interim report is attached in the attachment section as Attachment E.

## **D. Annual Statement/Performance and Evaluation Report (50075.1)**

HACG has committed or obligated previous and current capital fund awards to its Rental Assistance Demonstration (RAD) Projects. HACG attaches open P&Es:

- ✓ HACG's 2017 Annual Contributions Contract (**ACC**)
  - Submitted August 2017, approved November 2017
  - HACG anticipates that 2017 funds will be fully obligated no later than July 31, 2021
- ✓ HACG's 2014 ACC
  - Submitted April 2014, approved May 2014
  - HACG anticipates that 2014 funds will be fully obligated no later than April 30, 2018

under the Attachments Section of this document.

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<sup>15</sup> HACG's senior management-initiated deliberations regarding its evaluation team

## ATTACHMENT ITEMS

Attachment A: Resolution Adopting the Annual MTW Plan	A-1
Attachment B: Certifications of Compliance	B-1
Attachment C: Public Comments	C-1
Attachment D: Annual Statement/ Performance and Evaluation Report	D-1
Attachment E: Latest Evaluation Findings (CSU)	E-1



RESOLUTION NO. 3298

**A RESOLUTION APPROVING THE MOVING TO WORK (MTW) DEMONSTRATION PROGRAM'S FISCAL YEAR 2019 ANNUAL PLAN AND SUBMISSION OF SAID PLAN AND PLAN'S CERTIFICATIONS OF COMPLIANCE TO THE DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT (HUD)**

**WHEREAS**, the Board of Commissioners of The Housing Authority of Columbus, Georgia (HACG) by Resolution No. 3166 originally approved submission of a Moving-to-Work (MTW) Demonstration Program Application; Annual Plan, and Certifications of Compliance to the Department of Housing and Urban Development; and,

**WHEREAS**, HACG's MTW Application was approved and HACG entered into a Standard MTW Agreement with HUD on July 3, 2013; and,

**WHEREAS**, HACG's Standard MTW Agreement with HUD was extended through 2028 on April 14, 2016; and,

**WHEREAS**, as part of the Standard MTW Agreement between HACG and HUD, a Plan and Certifications of Compliance must be submitted annually to HUD for approval; and,

**WHEREAS**, HACG has prepared such a plan in accordance with HUD's rules, regulations and guidance; and,

**WHEREAS**, the proposed FY 2019 Annual MTW Plan was made available for public review and comment from January 26, 2018 to February 25, 2018 and public hearings/meetings were held on the proposed FY 2019 plan on February 13, 2018; and,

**WHEREAS**, HACG considered all comments received regarding said FY 2019 MTW Plan;

**NOW THEREFORE BE IT RESOLVED** by the Board of Commissioners:

1. That HACG's FY 2019 Annual MTW Plan is approved;
2. The Chairman or Secretary/Chief Executive Officer is authorized to execute the Certifications of Compliance, and,
3. Submission of said Certifications and FY 2019 Annual MTW Plan to HUD is authorized.

R. Larry Cardin  
Name of Authorized Official

R. Larry Cardin  
Signature



Form 50900: Elements for the Annual MTW Plan and Annual MTW Report

Attachment B

**Certifications of Compliance**

Annual Moving to Work Plan  
Certifications of Compliance

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

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

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairman or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the Annual Moving to Work Plan for the PHA fiscal year beginning July 1, 2018, hereinafter referred to as "the Plan", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:

1. The PHA published a notice that a hearing would be held, that the Plan and all information relevant to the public hearing was available for public inspection for at least 30 days, that there were no less than 15 days between the public hearing and the approval of the Plan by the Board of Commissioners, and that the PHA conducted a public hearing to discuss the Plan and invited public comment.
2. The 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 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.
4. The PHA will carry out the Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990.
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 PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan.
7. The PHA will affirmatively further fair housing by examining its programs or proposed programs, identify any impediments to fair housing choice within those programs, address those impediments in a reasonable fashion in view of the resources available and work with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement and maintain records reflecting these analyses and actions.
8. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
9. The PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
10. The PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
11. The PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.
12. The PHA will comply with requirements with regard to compliance with restrictions on lobbying required by 24 CFR Part 87, together with disclosure forms if required by this Part, and with restrictions on payments to influence Federal Transactions, in accordance with the Byrd Amendment and implementing regulations at 49 CFR Part 24.

Attachment B

1



13. The PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.
14. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105( a).
15. The 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 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.
16. With respect to public housing the PHA will comply with Davis-Bacon or HUD determined wage rate requirements under section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
17. The PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.
18. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.
19. The PHA will comply with the policies, guidelines, and requirements of OMB Circular No. A-87 (Cost Principles for State, Local and Indian Tribal Governments) and 24 CFR Part 85 (Administrative Requirements for Grants and Cooperative Agreements to State, Local and Federally Recognized Indian Tribal Governments).
20. The PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the Moving to Work Agreement and Statement of Authorizations and included in its Plan.
21. All attachments to the Plan have been and will continue to be available at all times and all locations that the Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the PHA in its Plan and will continue to be made available at least at the primary business office of the PHA.

<u>The Housing Authority of Columbus, Georgia</u>	<u>GA 004</u>
PHA Name	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)

<u>R. Larry Cardin</u>	<u>Chairman, HACG Board of Commissioners</u>
Name of Authorized Official	Title
	<u>March 21, 2018</u>
Signature	Date

\*Must be signed by either the Chairman or Secretary of the Board of the PHA's legislative body. This certification cannot be signed by an employee unless authorized by the 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.

HOUSING AUTHORITY OF COLUMBUS, GEORGIA'S PUBLIC COMMENT PROCESS:		
Date	Action / Event	Attendance Count
Thursday, January 25, 2018	Sent email to HACG staff/affiliates announcing public meeting. Included flyer for recipients to print/post in conspicuous areas for clients, employees, landlords, residents, and visitors to see.	48
Friday, January 26, 2018	Public Hearing announcement, dates published in the Ledger-Enquirer (Columbus' local newspaper) and on HACG's website, www.columbushousing.org	Not Applicable
Tuesday, February 6, 2018	Sent email to HACG staff announcing public meeting. Included flyer for recipients to print/post in conspicuous areas for clients, employees, landlords, residents, and public to see.	49
Friday, February 9, 2018	Sent email to HACG partners announcing public meeting. Included flyer for recipients to print/post in conspicuous areas for clients, employees, landlords, residents, and public to see.	19
Tuesday, February 13, 2018	<b>11 a.m. Public Hearing:</b> HACG staff presented 2019 Annual MTW Plan at the Resident Advisory Board Meeting.	5
Tuesday, February 13, 2018	<b>4 p.m. Public Hearing:</b> HACG staff presented 2019 Annual MTW Plan at the Resident Advisory Board Meeting.	17
Wednesday, February 21, 2018	<b>Public Meeting:</b> HACG staff presented 2019 Annual MTW Plan at the Joint Presidents' Council Meeting.	25

The Housing Authority of Columbus, Georgia

PUBLIC HEARING - TUESDAY, FEBRUARY 13, 2018 @ 11:00 a.m.	
Public Comment	HACG's Response
[Has HACG] learned anything from the higher payment standards?	Overall, data seems to support comfort, where residents continue to live in areas outside of low-poverty areas identified by HACG.
Clarify HACG Section 8 [Project-Based] Program [Flexibility]	This activity will provide HACG with more options to determine unit eligibility, as well as location of assisted housing. Currently, HACG cannot redevelop Chase Homes because of current rules and regulations, as well as local-interest groups. This activity provides HACG with the flexibility to navigate affordable housing barriers and obstacles.
Are there incentives (e.g. tax breaks, religious beliefs, etc.) that can be given to encourage the building of low/mixed-income housing into wealthy areas?	HACG does not and cannot provide any development incentives. These type of incentives are usually provided by local and state governments.
Is the Ralston salvageable?	HACG does not own the Ralston and is not familiar with its condition. From the outside, the structure appears sound, but there could be mechanical issues inside which could make a purchase and rehab project very expensive. HACG has not conducted a cost-benefit analysis on the Ralston.
Will families [that] are in over-housed units be made homeless [once] correct [sized] family becomes available?	No, HACG does not intend to displace housed families. The Wait List family will remain on the Wait List until HACG finds an appropriate-sized unit that meets the over-housed family's accommodation needs

The Housing Authority of Columbus, Georgia



Public Comment	HACG's Response
<p>What about interims? What if a family used their one interim but had a major change in income; [what is their recourse?]</p>	<p>Under this activity, HACG seeks to increase staff productivity time by limiting the number of interims annually, as well as prepare its assisted families for life beyond assisted housing. Families have the opportunity to choose if they really want to use their interim during a 6 month window between the 1st 90 days after a certification and 90 days before an annual certification. HACG does not intend to grant interims immediately after or immediately before a certification.</p>
<p>Yes, [residents do] and they have 10 days to report [changes] (public comment in response to interim discussion).</p>	<p>The 10-day reporting time remains. HACG will notate files internally. HACG intends for families to consider all options before using their interim examination for "non-emergency" situations that may last a short time.</p>
<p>How can you use child support (as an income source) if it is not guaranteed? Often the [non-custodial] parent may pay this month and skip 3 months.</p>	<p>HACG actually recognized this trend and eliminated child support income for public housing residents in 2015. However, since then, HACG has used Low-Income Housing Tax Credit (LIHTC) funding to meet conversion requirements under the Rental Assistance Demonstration (RAD). Because of program requirements, HACG has closed out the MTW Activity. Meanwhile, HACG continues to encourage custodial parents to go through the GA Child Support Enforcement Agency to improve income reporting to HACG and minimize payment conflicts with the non-custodial parent. Child support income reported in any other manner may be treated as Contribution Income, which may limit a family's flexibility or calculation schedule.</p>

Public Comment	HACG's Response
<p>What is the status of the covered patio at the Cottages and the 24-hour security cameras?</p>	<p>HACG is in the process of upgrading computer lines to fiber optics, so some cameras may be inoperable during this upgrade period. Staff will confer with the Director of Housing Enterprise Operations for the latest status.</p> <p>Property was developed with pergola (or trellis) intended for vegetation. A covered patio is not budgeted. Staff will confer with the Director of Housing Enterprise Operations for the latest status.</p>
<p>Why can't our apartments get refurbished with new paint on the walls? Our rent went up, but we have no new amenities. It does no good to inform management, they won't help</p>	<p>HACG is conducting a housing analysis on its remaining public housing sites, which includes Canty, Chase, Rivers, and Williams. As it stands, it is not fiscally prudent for HACG to repaint units when a modernization of the property will address site and unit ailments. Further, HACG "refreshes" each unit once current occupants move out as is customary in the private market.</p>
<p>I live in Arbor Pointe, all you have to do is ask maintenance nicely, they will give you what you need, that's what we do.</p> <p>Maintenance has changed my sink 3 times last year because they were using cheap products</p>	<p>HACG apologizes for the inconvenience and prides itself on completing jobs the first time. HACG reminds you that sometimes new products and old infrastructure do not always fuse together well, so HACG continues to address issues as they are reported. HACG also wants to remind you that it is conducting housing analyses on its remaining public housing sites for modernization purposes during this conversion period from public housing to project-based vouchers under Section 8.</p>



Public Comment	HACG's Response
Who's going to enforce that (reference to the Smoke-Free Rule)?	HACG's property managers will enforce the Smoke-Free Rule: 1st offense is a written warning and cessation referrals; 2nd offense is a written warning, \$50 fine, and meeting with CEO; the 3rd offense is a \$250 fine and eviction.
What if people passing by leave butts in our yards (how will we be treated)?	Generally, property management companies can tell units that have been smoked in, such as wall discoloration, smoke smell in vents, etc. . . There are ways that HACG can tell, so a few butts will be addressed accordingly.
I heard you can't smoke in the units, not [on] the property. Will there be smoking areas?	Designated smoking area premise has changed to no smoking on the property. A final decision will be adopted by HACG's Board of Commissioners and shared with residents at all HACG-owned (direct and indirect ownership) sites
Is this through HUD?	Yes, HUD instituted a Smoke-Free Rule for public housing sites effective July 31, 2018
Will [HACG] send out notices before this rule is implemented?	Yes, HACG will use various platforms to inform residents of the rule, as well as include an addendum to existing leases.
I can help people quit. I quit cold turkey over 15 years ago	HACG will provide smoking-cessation referrals to families that express an interest in wanting to quit smoking and/or part of the corrective action taken for Smoke-Free Rule violators.
Your health insurance will pay for meds to help you quit	

Attachment C

<b>PUBLIC HEARING - TUESDAY, FEBRUARY 13, 2018 @ 4:00 p.m.</b>	
<b>Public Comment</b>	<b>HACG's Response</b>
Is there a age limit for Patriot Pointe?	Yes, Patriot Pointe is a near-elderly property and residents must be 55 years old or older to live there. A preference is given to elderly residents (62+)
You have to have a job before you move, right?	Correct, HACG limits its voucher movement to work related reasons (with exceptions). So HACG is looking for hire letters, permanent change station (PCS) orders, or similar documentation to support vouchers coming into or moving out of Columbus.
Have you learned anything from this study (Community Choice) so far?	Columbus State University (CSU) is HACG's MTW Activity evaluator and overall has provided evidence that seems to support comfort over opportunity. CSU will provide a final report in August.
Does that mean just the units (applicability of Smoke-Free Rule)?	No, the Smoke-Free Rule is applicable to the property, which means that you must go to the property line, step over it, and smoke. This rule only applies to public housing property now, but may be extended to other property owned by HACG.  Columbus Commons is already a Smoke-Free property

The Housing Authority of Columbus, Georgia

Attachment C ~ 6 ~

<b>PLAN COMMENTS RECEIVED OUTSIDE OF PUBLIC HEARING OR PUBLIC MEETINGS</b>	
<b>Reviewer (method) Comment</b>	<b>HACG's Response</b>
HACG did not receive any comments via any other medium	N/A





2014 Capital Fund

Capital Fund Program  
(CFP) Amendment  
To The Consolidated Annual Contributions  
Contract (form HUD-53012)

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

Whereas, (Public Housing Authority) Housing Authority of the City of Columbus GA004 (herein called the "PHA") and the United States of America, Secretary of Housing and Urban Development (herein called "HUD") entered into Consolidated Annual Contributions Contract(s) ACC(s) Number(s) A2384 dated 5/17/1996

Whereas, HUD has agreed to provide CFP assistance, upon execution of this Amendment, to the PHA in the amount to be specified below for the purpose of assisting the PHA in carrying out development, capital and management activities at existing public housing projects in order to ensure that such projects continue to be available to serve low-income families. HUD reserves the right to provide additional CFP assistance in this FY to the PHA. HUD will provide a revised ACC Amendment authorizing such additional amounts.

\$ 2,212,993.00 for Fiscal Year 2014 to be referred to under Capital Fund Grant Number GA05P00450114  
PHA Tax Identification Number (TIN): On File DUNS Number: On File

Whereas, HUD and the PHA are entering into the CFP Amendment Number 41

Now Therefore, the ACC(s) is (are) amended as follows:

1. The ACC(s) is (are) amended to provide CFP assistance in the amount specified above for development, capital and management activities of PHA projects. This CFP Amendment is a part of the ACC(s).

2. The PHA must carry out all development, capital and management activities in accordance with the United States Housing Act of 1957 (the Act), 24 CFR Part 905 (the Capital Fund Final rule) published at 78 Fed. Reg. 63748 (October 24, 2013), as well as other applicable HUD requirements.

3. The PHA has a HUD-approved Capital Fund Five Year Action Plan and has complied with the requirements for reporting on open grants through the Performance and Evaluation Report. The PHA must comply with 24 CFR 505.300 of the Capital Fund Final rule regarding amendment of the Five Year Action Plan where the PHA proposes a Significant Amendment the Capital Fund Five Year Action Plan.

4. For cases where HUD has approved a Capital Fund Financing Amendment to the ACC, HUD will deduct the payment for amortization scheduled payments from the grant immediately on the effective date of this CFP Amendment. The payment of CFP funds due per the amortization scheduled will be made directly to a designated trustee within 3 days of the due date.

5. Unless otherwise provided, the 24 month time period in which the PHA must obligate this CFP assistance pursuant to section 9(j)(1) of the Act and 48 month time period in which the PHA must expend this CFP assistance pursuant to section 9(j)(5) of the Act starts with the effective date of this CFP amendment (the date on which CFP assistance becomes available to the PHA for obligation). Any additional CFP assistance this FY will start with the same effective date.

6. Subject to the provisions of the ACC(s) and paragraph 3, and to assist in development, capital and management activities, HUD agrees to disburse to the PHA or the designated trustee from time to time as needed up to the amount of the funding assistance specified herein.

7. The PHA shall continue to operate each public housing project as low-income housing in compliance with the ACC(s), as amended, the Act and all HUD regulations for a period of twenty years after the last disbursement of CFP assistance for modernization activities for each public housing project or portion thereof and for a period of forty years after the last distribution of CFP assistance for development activities for each public housing project and for a period of ten years following the last payment of assistance from the Operating Fund to each public housing project.

The parties have executed this CFP Amendment, and it will be effective on 5/13/2014. This is the date on which CFP assistance becomes available to the PHA for obligation.

However, the provisions of Section 7 of the ACC shall remain in effect for so long as HUD determines there is any outstanding indebtedness of the PHA to HUD which arose in connection with any public housing project(s) under the ACC(s) and which is not eligible for forgiveness, and provided further that, no disposition of any project covered by this amendment shall occur unless approved by HUD.


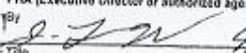
8. The PHA will accept all CFP assistance provided for this FY. If the PHA does not comply with any of its obligations under this CFP Amendment and does not have its Annual PHA Plan approved within the period specified by HUD, HUD shall impose such penalties or take such remedial action as provided by law. HUD may direct the PHA to terminate all work described in the Capital Fund Annual Statement of the Annual PHA Plan. In such case, the PHA shall only incur additional costs with HUD approval.

9. Implementation or use of funding assistance provided under this CFP Amendment is subject to the attached corrective action order(s).  
(mark one):  Yes  No

10. The PHA is required to report in the format and frequency established by HUD on all open Capital Fund grants awarded, including information on the installation of energy conservation measures.

11. If CFP assistance is provided for activities authorized pursuant to agreements between HUD and the PHA under the Rental Assistance Demonstration Program, the PHA shall follow such applicable statutory authorities and all applicable HUD regulations and requirements. For total conversion of public housing projects, the provisions of Section 7 of the ACC shall remain in effect for so long as HUD determines there is any outstanding indebtedness of the PHA to HUD which arose in connection with any public housing project(s) under the ACC(s) and which is not eligible for forgiveness, and provided further that, no disposition or conversion of any public housing project covered by these terms and conditions shall occur unless approved by HUD. For partial conversion, the PHA shall continue to operate each non-converted public housing project as low-income housing in accordance with paragraph 7.

12. CFP assistance provided as an Emergency grant shall be subject to a 12 month obligation and 24 month expenditure time period, respectively. CFP assistance provided as a Safety and Security or Natural Disaster grant shall be subject to a 24 month obligation and 48 month expenditure time period, respectively. The start date shall be the date on which such funding becomes available to the PHA for obligation. The PHA must record the Declaration(s) of Trust within 60 days of the effective date or HUD will recapture the funds.

U.S. Department of Housing and Urban Development By:  Title: Director Office of Public Housing	Date: MAY 13 2014	PHA (Executive Director or authorized agent) By:  Date: 4/8/14
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Previous versions obsolete

form HUD-52140-A 03/04/2003

Annual Statement/Performance and Evaluation Report  
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and  
 Capital Fund Financing Program

U.S. Department of Housing and Urban Development  
 Office of Public and Indian Housing  
 OMB No. 25377-0226  
 Expires: 4/30/2011

Part I: Summary		Grant Type and Number		FFY of Grant 2014	
PHA Name: Housing Authority of Columbus, Georgia		Capital Fund Program Grant No: GA06P004 501014		FFY of Grant: Approvals 2014	
		Replacement Housing Factor Grant No:			
		Date of CFFP:			
Type of Grant		Reserve for Disasters/Emergencies		Total Actual Cost <sup>1</sup>	
Original Annual Statement		Original		Obligated	
Performance and Evaluation Report for Period Ending:		Revised <sup>2</sup>		Expended	
Line	Summary by Development Account	Original	Revised <sup>2</sup>	Obligated	Expended
1	Total non-CFFP Funds				
2	1406 Operations (may not exceed 20% of line 21) <sup>3</sup>				
3	1408 Management Improvements				
4	1410 Administration (may not exceed 10% of line 21)				
5	1411 Audit				
6	1415 Liquidated Damages				
7	1430 Fees and Costs				
8	1440 Site Acquisition				
9	1450 Site Improvement				
10	1460 Dwelling Structures				
11	1465.1 Dwelling Equipment—Nonexpendable				
12	1470 Non-dwelling Structures				
13	1475 Non-dwelling Equipment				
14	1485 Demolition				
15	1492 Moving to Work Demonstration				
16	1495.1 Relocation Costs	2,212,993		2,212,993	2,161,943
17	1499 Development Activities <sup>4</sup>				

<sup>1</sup> To be completed for the Performance and Evaluation Report.  
<sup>2</sup> To be completed for the Performance and Evaluation Report.  
<sup>3</sup> PHAs with under 250 units in management may use 100% of CFFP Grants for operations.  
<sup>4</sup> RIF funds shall be included here.



Annual Statement/Performance and Evaluation Report  
Capital Fund Program, Capital Fund Program Replacement Housing Factor and  
Capital Fund Financing Program

Part I: Summary		FFY of Grant: 2014	
PHA Name: Housing Authority of Columbus, Georgia		FFY of Grant Approval: 2014	
Grant Type and Number Capital Fund Program Grant No.: GA06P004501014 Replacement Housing Factor Grant No.:		FFY of Grant Approval: 2014	
Date of CFFP:		FFY of Grant Approval: 2014	
Type of Grant <input type="checkbox"/> Original Annual Statement <input type="checkbox"/> Performance and Evaluation Report for Period Ending:		<input type="checkbox"/> Revised Annual Statement (revision no: ) <input type="checkbox"/> Final Performance and Evaluation Report	
Summary by Development Account		Total Actual Cost <sup>1</sup>	
Line	Original	Revised <sup>2</sup>	Expended
18a	1501 Collateralization or Debt Service paid by the PHA		
18b	9000 Collateralization or Debt Service paid Via System of Direct Payment		
19	1502 Contingency (may not exceed 8% of line 20)		
20	Amount of Annual Grant: (sum of lines 2 - 19)	2,212,993	2,161,943
21	Amount of line 20 Related to LBP Activities		
22	Amount of line 20 Related to Section 504 Activities		
23	Amount of line 20 Related to Security - Soft Costs		
24	Amount of line 20 Related to Security - Hard Costs		
25	Amount of line 20 Related to Energy Conservation Measures		
<b>Signature of Executive Director</b>		<b>Signature of Public Housing Director</b>	
<b>Date</b>		<b>Date</b>	

<sup>1</sup> To be completed for the Performance and Evaluation Report.  
<sup>2</sup> To be completed for the Performance and Evaluation Report or a Revised Annual Statement.  
<sup>3</sup> PHAs with under 250 units in management may use 100% of CFP Grants for operations.  
<sup>4</sup> RHF funds shall be included here.

Annual Statement/Performance and Evaluation Report  
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and  
 Capital Fund Financing Program

U.S. Department of Housing and Urban Development  
 Office of Public and Indian Housing  
 OMB No. 2577-0226  
 Expires 4/30/2011

Part II: Supporting Pages		Federal FFY of Grant: 2014	
PHA Name: Housing Authority of Columbus, Georgia		Capital Fund Program Grant No: GA06P004501014	
Development Number Name/PHA-Wide Activities		Development Account No.	Quantity
General Description of Major Work Categories		Development Account No.	Quantity
		Original	Revised <sup>1</sup>
		Funds Obligated <sup>2</sup>	Funds Expended <sup>2</sup>
		Total Actual Cost	
		Status of Work	
	1492 Moving to Work Demonstration	1492	
	Capital Funds will be expended on the following areas: Physical Improvements, Management Improvements, PHA-Wide Non-Dwelling Structures and Equipment, Administration, Operations, Fees & Costs, and Section 8 Landlord payments. Capital Funds will be expended on costs associated with the Booker T. Washington (BTW) (GA004000402) redevelopment. Phase I of the project include, but are not limited to demolition, relocation, consultants, non-dwelling structures and equipment, and other reasonable and necessary costs (see short-term goals and objectives). Capital Funds will be expended on site software and fiber optic cables agency wide.		
	TOTAL	2,212,993	2,212,993
		2,212,993	1,959,147

<sup>1</sup> To be completed for the Performance and Evaluation Report or a Revised Annual Statement.  
<sup>2</sup> To be completed for the Performance and Evaluation Report.





2017 Capital Fund

Capital Fund Program  
(CFP) Amendment  
To The Consolidated Annual Contributions  
Contract (form HUD-63012)

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

2017 JUN -2 PM 3:02

Whereas, (Public Housing Authority) Housing Authority of the City of Columbus GA004 (herein called the "PHA")  
and the United States of America, Secretary of Housing and Urban Development (herein called "HUD") entered into Consolidated Annual Contributions  
Contract(s) ACC(s) Number(s) A2384 dated 5/17/1996

Whereas, HUD has agreed to provide CFP assistance, upon execution of this Amendment, to the PHA in the amount to be specified below for the purpose of assisting the PHA in carrying out development, capital and management activities at existing public housing projects in order to ensure that such projects continue to be available to serve low-income families. HUD reserves the right to provide additional CFP assistance in this FY to the PHA. HUD will provide a revised ACC Amendment authorizing such additional amounts.

\$ 1,539,989.00 for Fiscal Year 2017 to be referred to under Capital Fund Grant Number GA01P00450117  
PHA Tax Identification Number (TIN): On File DUNS Number: On File

Whereas, HUD and the PHA are entering into the CFP Amendment Number 49

Now Therefore, the ACC(s) is (are) amended as follows:

- The ACC(s) is (are) amended to provide CFP assistance in the amount specified above for development, capital and management activities of PHA projects. This CFP Amendment is a part of the ACC(s).
- The PHA must carry out all development, capital and management activities in accordance with the United States Housing Act of 1937 (the Act), 24 CFR Part 905 (the Capital Fund Final rule) published at 78 Fed. Reg. 63748 (October 24, 2013), as well as other applicable HUD requirements, except that the limitation in section 9(j)(1) of the Act is increased such that of the amount of CFP assistance provided for under this CFP Amendment only, the PHA may use no more than 25 percent for activities that are eligible under section 9(e) of the Act only if the PHA's HUD-approved Five Year Action Plan provides for such use; however, if the PHA owns or operates less than 250 public housing dwelling units, such PHA may continue to use the full flexibility in section 9(j)(2) of the Act.
- The PHA has a HUD-approved Capital Fund Five Year Action Plan and has complied with the requirements for reporting on open grants through the Performance and Evaluation Report. The PHA must comply with 24 CFR 905.300 of the Capital Fund Final rule regarding amendment of the Five Year Action Plan where the PHA proposes a Significant Amendment to the Capital Fund Five Year Action Plan.
- For cases where HUD has approved a Capital Fund Financing Amendment to the ACC, HUD will deduct the payment for amortization scheduled payments from the grant immediately on the effective date of this CFP Amendment. The payment of CFP funds due per the amortization scheduled will be made directly to a designated trustee within 3 days of the due date.
- Unless otherwise provided, the 24 month time period in which the PHA must obligate this CFP assistance pursuant to section 9(j)(1) of the Act and 48 month time period in which the PHA must expend this CFP assistance pursuant to section 9(j)(5) of the Act starts with the effective date of this CFP Amendment (the date on which CFP assistance becomes available to the PHA for obligation). Any additional CFP assistance this FY will start with the same effective date.
- Subject to the provisions of the ACC(s) and paragraph 3, and to assist in development, capital and management activities, HUD agrees to disburse to the PHA or the designated trustee from time to time as needed up to the amount of the funding assistance specified herein.
- The PHA shall continue to operate each public housing project as low-income housing in compliance with the ACC(s), as amended, the Act and all HUD regulations for a period of twenty years after the last disbursement of CFP assistance for modernization activities for each public housing project or portion thereof and for a period of forty years after the last distribution of CFP

assistance for development activities for each public housing project and for a period of ten years following the last payment of assistance from the Operating Fund to each public housing project. However, the provisions of Section 7 of the ACC shall remain in effect for so long as HUD determines there is any outstanding indebtedness of the PHA to HUD which arose in connection with any public housing project(s) under the ACC(s) and which is not eligible for forgiveness, and provided further that, no disposition of any project covered by the amendment shall occur unless approved by HUD.

8. The PHA will accept all CFP assistance provided for the FY, if the PHA does not comply with any of its obligations under this CFP Amendment and does not have its Annual PHA Plan approved within the period specified by HUD. HUD shall impose such penalties or take such remedial action as provided by law. HUD may direct the PHA to terminate all work described in the Capital Fund Annual Statement of the Annual PHA Plan. In such case, the PHA shall only incur additional costs with HUD approval.

9. Implementation or use of funding assistance provided under this CFP Amendment is subject to the attached corrective action order(s):  
(mark one):  Yes  No

10. The PHA is required to report in the format and frequency established by HUD on all open Capital Fund grants awarded, including information on the installation of energy conservation measures.

11. If CFP assistance is provided for activities authorized pursuant to agreements between HUD and the PHA under the Rental Assistance Demonstration Program, the PHA shall follow such applicable statutory authorities and all applicable HUD regulations and requirements. For total conversion of public housing projects, the provisions of Section 7 of the ACC shall remain in effect for so long as HUD determines there is any outstanding indebtedness of the PHA to HUD which arose in connection with any public housing project(s) under the ACC(s) and which is not eligible for forgiveness, and provided further that, no disposition or conversion of any public housing project covered by those terms and conditions shall occur unless approved by HUD. For partial conversion, the PHA shall continue to operate each non-converted public housing project as low-income housing in accordance with paragraph 7.

12. CFP assistance provided as an Emergency grant or a Safety and Security grant shall be subject to a 12 month obligation and 24 month expenditure time period. CFP assistance provided as a Natural Disaster grant shall be subject to a 24 month obligation and 48 month expenditure time period. The start date shall be the date on which such funding becomes available to the PHA for obligation. The PHA must record the Declaration(s) of Trust within 60 days of the effective date or HUD will recapture the funds.

The parties have executed this CFP Amendment, and it will be effective on 8/16/2017. This is the date on which CFP assistance becomes available to the PHA for obligation.

U.S. Department of Housing and Urban Development

By: *[Signature]* Date: 8/16/17  
Title: *[Signature]*

PHA (Executive Director or authorized agent)

By: *[Signature]* Date: 8/16/17  
Title: *[Signature]*

Previous versions obsolete

form HUD-62840-A, CMB Approval No. 2677-0157 (exp. 08/31/2020)

Annual Statement/Performance and Evaluation Report  
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and  
 Capital Fund Financing Program

U.S. Department of Housing and Urban Development  
 Office of Public and Indian Housing  
 OMB No. 2577-0226  
 Expires 4/30/2011

Part I: Summary		Grant Type and Number		FFY of Grant: 2017	
PHA Name: Housing Authority of Columbus, Georgia		Capital Fund Program Grant No: GA01P00450117		FFY of Grant Approval: 2017	
		Replacement Housing Factor Grant No:			
		Date of CFPP:			
Type of Grant	Original Annual Statement	Reserve for Disasters/Emergencies	Revised Annual Statement (revision no: )	Total Estimated Cost	Total Actual Cost <sup>1</sup>
Line	Performance and Evaluation Report for Period Ending:	Summary by Development Account	Final Performance and Evaluation Report	Revised <sup>2</sup>	Expended
1	Total non-CFP Funds				
2	1406 Operations (may not exceed 20% of line 21) <sup>3</sup>				
3	1408 Management Improvements				
4	1410 Administration (may not exceed 10% of line 21)				
5	1411 Audit				
6	1415 Liquidated Damages				
7	1430 Fees and Costs				
8	1440 Site Acquisition				
9	1450 Site Improvement				
10	1460 Dwelling Structures				
11	1465.1 Dwelling Equipment—Nonexpendable				
12	1470 Non-dwelling Structures				
13	1475 Non-dwelling Equipment				
14	1485 Demolition				
15	1492 Moving to Work Demonstration				
16	1495.1 Relocation Costs			1,539,969	
17	1499 Development Activities <sup>4</sup>				

<sup>1</sup> To be completed for the Performance and Evaluation Report.  
<sup>2</sup> To be completed for the Performance and Evaluation Report or a Revised Annual Statement.  
<sup>3</sup> PHAs with under 250 units in management may use 100% of CFP Grants for operations.  
<sup>4</sup> RHF funds shall be included here.

Page |



Annual Statement/Performance and Evaluation Report  
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and  
 Capital Fund Financing Program

U.S. Department of Housing and Urban Development  
 Office of Public and Indian Housing  
 OMB No. 2577-0226  
 Expires 4/30/2011

<b>Part I: Summary</b>		FFY of Grant: 2017	
PHA Name: Housing Authority of Columbus, Georgia		FFY of Grant Approval: 2017	
Grant Type and Number Capital Fund Program Grant No.: GA01P00450117 Replacement Housing Factor Grant No.:			
Date of CFFP:			
Type of Grant <input checked="" type="checkbox"/> Original Annual Statement <input type="checkbox"/> Performance and Evaluation Report for Period Ending: Summary by Development Account		<input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Revised Annual Statement (revision no: ) <input type="checkbox"/> Final Performance and Evaluation Report	
Line		Total Estimated Cost Original	Total Actual Cost <sup>1</sup> Obligated Expended
18a	1501 Collateralization or Debt Service paid by the PHA		
18ba	9000 Collateralization or Debt Service paid Via System of Direct Payment		
19	1502 Contingency (may not exceed 8% of line 20)		
20	Amount of Annual Grant: (sum of lines 2 - 19)	1,539,969	
21	Amount of line 20 Related to LBP Activities		
22	Amount of line 20 Related to Section 504 Activities		
23	Amount of line 20 Related to Security - Soft Costs		
24	Amount of line 20 Related to Security - Hard Costs		
25	Amount of line 20 Related to Energy Conservation Measures		
<b>Signature of Executive Director</b>		<b>Signature of Public Housing Director</b>	
Date		Date	

<sup>1</sup> To be completed for the Performance and Evaluation Report.  
<sup>2</sup> To be completed for the Performance and Evaluation Report or a Revised Annual Statement.  
<sup>3</sup> PHAs with under 250 units in management may use 100% of CFFP Grants for operations.  
<sup>4</sup> RHF funds shall be included here.

Annual Statement/Performance and Evaluation Report  
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and  
 Capital Fund Financing Program

U.S. Department of Housing and Urban Development  
 Office of Public and Indian Housing  
 OMB No. 2577-0226  
 Expires 4/30/2011

Part II: Supporting Pages		Federal FFY of Grant: 2017			
PHA Name: Housing Authority of Columbus, Georgia		Grant Type and Number			
Development Number/PHA-Wide Activities		Capital Fund Program Grant No.: GA01P00430117		CFPP (Yes/No):	
General Description of Major Work Categories		Replacement Housing Factor Grant No.:		Development Account No.	
		Quantity		Total Estimated Cost	
		Original		Revised <sup>1</sup>	
		Funds Obligated <sup>2</sup>		Funds Expended <sup>2</sup>	
		Total Actual Cost		Status of Work	
1492 Moving to Work Demonstration		1492			
Capital Funds will be expended on PHA-Wide physical improvements, management improvements, non-dwelling structures and equipment, relocation, administration, operations, fees and costs, and Section 8 landlord payments. Capital Funds will be expended on costs associated with the project development for the Rental Assistance Demonstration (RAD) properties to include: property condition assessments, environmental reviews and consultants for developing tax credit applications, renovation and improvements to dwelling units and amenities, site improvements to include erosion controlling retaining walls, hazardous material abatement, sewer line repair and replacement, and relocation costs. Funds will be expended on specific activities required for RAD for Warren Williams-Rivers Homes and Elizabeth F. Canty Homes, to include installation of smoke detectors, CO detectors where gas appliances are present, lever door hardware, reconfiguration of bathrooms in community buildings for ADA compliance, repair sidewalks, and re-striping of parking areas.					
<b>TOTAL</b>		<b>1,539,969</b>			

<sup>1</sup> To be completed for the Performance and Evaluation Report or a Revised Annual Statement.  
<sup>2</sup> To be completed for the Performance and Evaluation Report.

Annual Statement/Performance and Evaluation Report  
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and  
 Capital Fund Financing Program

U.S. Department of Housing and Urban Development  
 Office of Public and Indian Housing  
 OMB No. 2577-0226  
 Expires 4/30/2011

Development Number Name/PHA-Wide Activities	All Fund Obligated (Quarter Ending Date)		All Funds Expended (Quarter Ending Date)		Federal FFY of Grant: 2017  Reasons for Revised Target Dates <sup>1</sup>
	Original Obligation End Date	Actual Obligation End Date	Original Expenditure End Date	Actual Expenditure End Date	
	April 2019		April 2021		

<sup>1</sup> Obligation and expenditure end dates can only be revised with HUD approval pursuant to Section 9j of the U.S. Housing Act of 1957, as amended.

**Overview**

The following analysis are interpretations of the spatial data represented in the Submission 3, Set 2 data of the Community-Wide voucher program which is also known as the Community Choice program. This program provided voucher for up to 120% of local market rent for recipients to use to obtain qualified housing. This is Housing and Urban Development (HUD) sponsored research that is part of HUD's Moving to Work (MTW) program. This particular study is focused on exploring where recipients relocate when provided with substantial financial resources to do so.

Submission 3 was data provided on or about July 1, 2017. Set 1 data was obtained from surveys submitted by recipients for analysis and came from the Housing Authority of Columbus Georgia (HACG). Set 2 data was obtained from Vincent Taylor at the HACG.

The Set 2 data includes the previous and current addresses for voucher recipients in the HACG HUD sponsored Moving to Work (MTW) study. It also includes household sizes and indicates how household sizes in Submission 3 vary from those in Submission 2 (2016 data).

The Set 2 data contained 45 recipients of which 10 had relocated during the prior year. Of the 10 that relocated during the prior year, 8 were already in the Community Choice program and 2 were new to the program. 3 of the remaining 35 recipients were also new to the program in Submission 3 however they did not relocate.

This research has a conceptual focus on space. It uses geographic information systems (GIS) to explore the relationships between the location of voucher recipients, before and after their relocations, and their social environments. It combines visualization and descriptive spatial statistics to explore those relationships. In particular, the study looks at measures of central tendency. This is an appropriate focus because the data set of relocations in Submission 3, Set 2 data is only 10 recipients.

**Research questions and data used to address the questions**

Does the data suggest that recipients likely relocate to improve their access to potential amenities, services or jobs? To explore that question, proximity to the following list of providers was analyzed.

Grocery stores (including

Walmarts) Medical Services

providers

Retail Trade providers

Banking Services

providers Social

Assistance providers

Food Service providers

Nursing and Residential Care providers



Does the data suggest that recipients likely relocated to improve their access to public transportation? To explore this question, proximity to bus stops was analyzed. Since the routes inbound to town and outbound from town do not use the same bus stops, both an inbound and an outbound analysis was made.

Finally, does the data suggest that recipients likely relocated to improve their children's access to better quality education? To explore this question, the Georgia Department of Education College and Career Ready Performance Index (CCRPI) for elementary, middle and high schools serving the recipients was analyzed.

### **Amenities, Services, or Jobs**

Access to facilities was evaluated based on whether the nearest facility was within “walking distance” of the recipient's residential location. Walking distance was the Euclidian distance to the nearest facility.

This is often thought of as the distance “as the crow flies”. Studies have often indicated that people are willing to walk approximately ¼ mile before using a vehicle to make a trip. A more complete 2012 peer- reviewed study by Yang and Diez-Roux (Walking Distance by Trip Purpose and Population Subgroups found at <http://www.ncbi.nlm.nih.gov/pmc/articles/PMC3377942/>) indicates the distance people are willing to walk varies dependent on a number of factors including the purpose of the trip and the economic condition of the respondent. They found an average walking distance over their entire study group to be .7 miles (approximately 3,700 feet) and a median of .5 miles (2,640 feet).

This is an imperfect metric for many reasons. For example, there is no way of knowing from the data available whether recipients would feel comfortable using the nearest facility or traveling the shortest route to and from it. It does not conform to the manner people typically think of travel which is over sidewalks and/or roads (network distance). Since it does not measure network distance, it likely underestimates the distance to the facilities and it does not take into account intervening obstacles.

Many times people “make their stops” while commuting to work and this analysis does not take that dynamic into considerations. However, given the data available, it does provide a reasonable means for evaluating whether people are attempting to improve their access to common amenities, services, and jobs by relocating “nearer” to various facilities.

### *Groceries*

Groceries were defined as NAICS code 445110, 452910, 452311, and stores identified as “Walmart Supercenter”. This may omit some grocers. For example, some convenience stores are now carrying fresh vegetables but they would not be included in this selection. By this selection criteria 75 grocers were identified in Columbus.

Recipients' current locations were, on average, 3,386 feet from the nearest grocery provider. The median distance was 2,475 feet. The recipients' previous locations were a mean distance of 2,672 feet and a median distance of 2,153 feet from the nearest grocer. There was a change in the average distance to a grocer of 714 feet and a change in median distance of 322 feet. However, the relocations actually extended the distance to grocers rather than reducing the distance. As a review of the Amenities Report table will show, individual values for distances to grocers varied substantially from these central tendency values.



The central tendency measurers suggest that recipients, both before and after relocation, were within walking distance of a grocery.

### *Medical Services*

Medical Services were defined as standalone medical care facilities (621493) and hospitals (622110). Other medical providers were not included because there is considerable disagreement about who is a medical provider. For example, some would include chiropractors, herbalists, dentists, psychiatrists and osteopaths, and others would not. This criteria selected 69 medical services providers.

Recipients' current locations were a mean distance of 5,240 feet from the nearest medical facilities and their previous locations were 3,867 feet. The median current distance was 5,074 feet and it was 2,140 feet prior to the relocation. The data suggests that recipients tended to extend the distance through their relocations between themselves and medical facilities. Unlike groceries, the distance to medical facilities both before and after relocation was generally longer than people will typically walk for services.

### *Retail Trade*

Retail facilities were defined as NAICS codes from 44111 through 45439 and included 1,359 locations. Recipients' current locations were a mean distance of 1393 feet from the nearest retail facility and their previous locations were 989 feet. The median current distance was 1130 feet and it was 972 feet prior to the relocation.

In the particular case of retail trade, a second analysis was run exploring how many retail facilities were within a ½ mile radius of the current and previous locations of relocated recipients. One-half-mile was used as the buffer distance based on the research listed above. On average, 21 retail facilities fell within the ½ mile buffer of the recipients' current locations and 20 fell within that buffer of their previous locations. The mean count of businesses within the buffer was 19 for the current locations and 18 for the previous locations.

There does not seem to be convincing evidence that recipients relocated to improve their access to, or to isolate themselves from, retail facilities. In particular, the counts of facilities within the ½ mile buffer indicates this was, on average, simply not a pressing criteria for those relocating.

### *Banking Services*

Banks were defined as NAICS code 52211001 (ATMs) and 52211002 (commercial banks). This does not include check cashing services (522390xx), unsecured cash loan operations (522291xx), or similar operations. This criteria selected 260 ATMs and 54 banks.

The mean distance of recipients from a bank or ATM before relocating was 1,692 feet and the median was 1,146 feet. After relocating the mean distance was 1,710 feet and the median was 1,299 feet. There was very little change in the distance of recipients from banks or ATMs after their relocations.

### *Social Assistance Services*

Social Assistance Services were defined as NAICS codes 62411 through 62441. This included a wide range of providers such as YMCAs, some religious facilities, counseling services, recovery programs, the United Way, some day care facilities, etc. In total, 208 facilities were selected.

The mean distance of recipients from a social assistance facility before relocating was 195 feet and the median distance was 342 feet. The mean distance after relocating was 1,243 feet and the mean distance was 1,234 feet. The data suggests that people relocated further, whether or not by design, from social assistance facilities. However, given the broad nature of the entities that comprise this category, it is difficult to make much of a case for this representing an intentional preference by recipients when making relocation decisions. The researcher's suspicion is that there is some underlying process that makes an area both more attractive to voucher recipients and less attractive to social assistance facilities. However, there is insufficient data to examine such a potential underlying process.

### *Food Services*

During the tour of the HACG public housing facilities, the guides mentioned that the proximity of food services, particularly fast food providers, was of concern to their residents. They indicated that residents often found employment at fast food providers.

Food Services providers were defined as NAICS codes 72231 through 72251. The selection criteria identified 537 facilities. Recipients' current locations were a mean distance of 2,134 feet and a median distance of 1,768 feet from a food service provider. Prior to relocating they were a mean distance of 1,238 feet and a median distance of 1,241 feet. There were changes, arguably significant ones, in both the mean and median distances recipients resided from food services. However, the distance was actually greater after the relocation suggesting that, typically, recipients were not relocating to gain better access to these jobs.

### *Nursing and Residential Care Providers*

It appeared, while reviewing the Combined Set 1 data from Submission 1, 2, and 3, that 20% of the respondents wanted to go into health fields. One of the most common places people with entry level health care jobs work is nursing and residential care facilities.

Nursing and residential care providers were defined as NAICS codes 623110 through 623990. This selection criteria identified 57 facilities. Recipients' current locations were a mean distance of 3,275 feet and a median distance of 2,716 feet from the nearest facility. Prior to relocating they were a mean distance of 3,338 feet and median distance of 4,377 feet. The mean distance was essentially unchanged but the median distance was substantially shorter after relocation. Median statistics tend to reduce the influence of extreme values in a data set. The substantially reduced median distance is potentially important and warrants further study in future years.

## **Public Transportation**

### **Bus Routes**

According to HACG spokespersons on the facilities tour, approximately 40% of families in public housing do not have access to a vehicle. HACG facilities are located for maximum access to bus transportation. Does the data suggest that recipients moved to maximize that access?

This analysis cannot be directly compared to analysis made in previous years. This analysis is based on the locations of bus stops rather than simply bus routes. This likely creates a more realistic picture of accessibility to public transportation however it is clearly different than the analysis made using bus routes in previous years.

This analysis has also been broken into two segments. The first explores inbound bus stops and the second explores outbound bus stops. There was at least one recipient, Recipient 5, who had good access to an outbound route but there was no inbound route indicated in the area. It seems unlikely that a route that delivered people to an area would not also carry them from the area. Therefore the data from Recipient 5 is considered suspect.

Visual review of this data indicates that three recipients (10, 11, and 32), moved from relatively near bus stops to areas in the east side of Muscogee County with very little access to bus routes. The other recipients stayed within walking distance of bus stops.

The average distance to outbound bus stops prior to relocation was 1,352 feet with a median distance of 810 feet. The mean distance of current location outbound stops is 3389 feet with a median distance of 1,675 feet.

The average distance to inbound bus stops prior to relocation was 2,993 feet with a median distance of 1,149 feet. The mean distance of current location inbound stops is 6,120 feet with a median distance of 1,836 feet.

Prior to relocating, recipients were, on average, closer to bus stops than after their relocations. Some individuals may have moved to maximize access to bus stops, but it does not appear that, as a group, maximizing access to bus stops was a major consideration in relocation decisions.

**Education**

Did families with vouchers relocate to areas with better public schools than those they had previous access to? To explore this question, the 2016 edition of the State of Georgia Department of Education’s College and Career Ready Performance Index (CCRPI) was used as a measure of school performance.

The CCRPI is an indirect measure of what makes a school more or less desirable to parents. There is ample room for error in the assumption that the CCRPI captures the qualities of schools that parents might desire for their children. Further, it is unknown to what degree respondents knew about or cared about the CCRPI. However, to some degree it is believed that the CCRPI reflects characteristics of the schools that are general knowledge in the community. The higher your level of confidence in that assumption the more beneficial you are apt to find this analysis.

To measure change in the CCRPI between the schools serving the current address and those serving the prior address, the value of the prior address was subtracted from that of the current address. When the sum is positive the move resulted in relocation to a school with a higher CCPRI. When the sum is negative the move resulted in relocation to a school with a lower CCPRI.

There were 10 respondents in Submission 3, Set 2 that relocated. The following table compares the schools serving the recipient’s current addresses to those serving their prior addresses.

	Current Improved	Current Diminished	Current Same
Elementary	2	6	2
Middle	6	2	2
High	2	5	3

The mean level of diminishment in the CCPRI for elementary schools as a result of the move was approximately 4 points. The median diminishment was approximately 2 points. The mean improvement for middle schools was approximately 1.5 points. The median improvement was approximately 2.5 points. The mean diminishment for high schools was approximately 2 points. The median diminishment was 3 points.

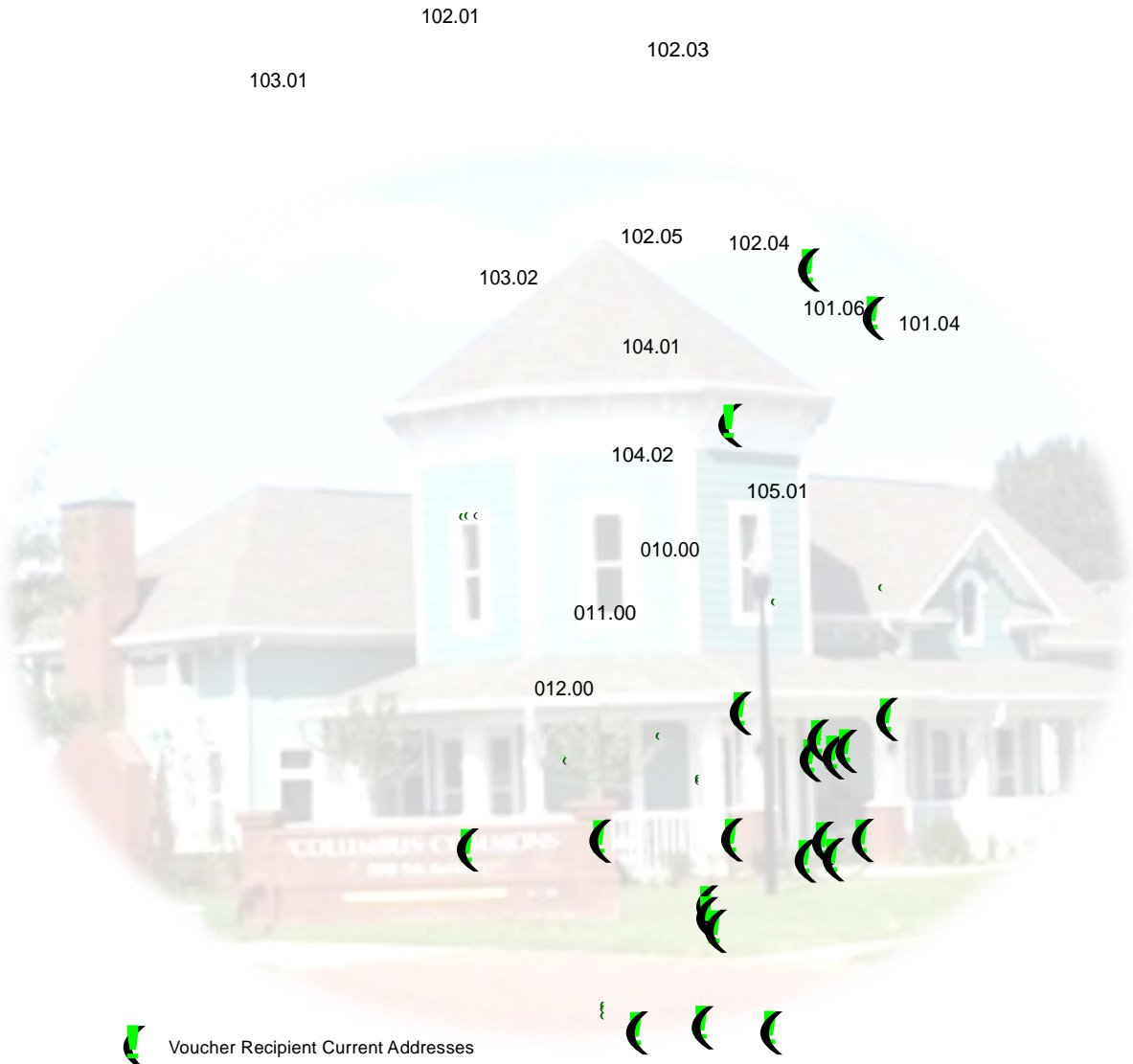
### Analytical Thoughts

The analysis does not suggest a strong correlation between a selection of amenity, job, and educational spatial variables and relocation decisions. However, not much of value can be said analytically about such a small data set. There could, for example, be correlations that simply do not rise to significance in such a small set of data. There could be variables that are far more important than the ones selected for analysis.

There is one speculative consideration I would like to raise. All of the vouchers under this program are Section 8 vouchers and as such recipients are restricted to using the vouchers in Section 8 approved housing. It may be that the most desirable Section 8 approved housing is in very limited supply and that an open unit drives relocation decisions far more than the proximity of the open unit to amenities, jobs, or school districts. This line of inquiry might be a fruitful avenue for future research.



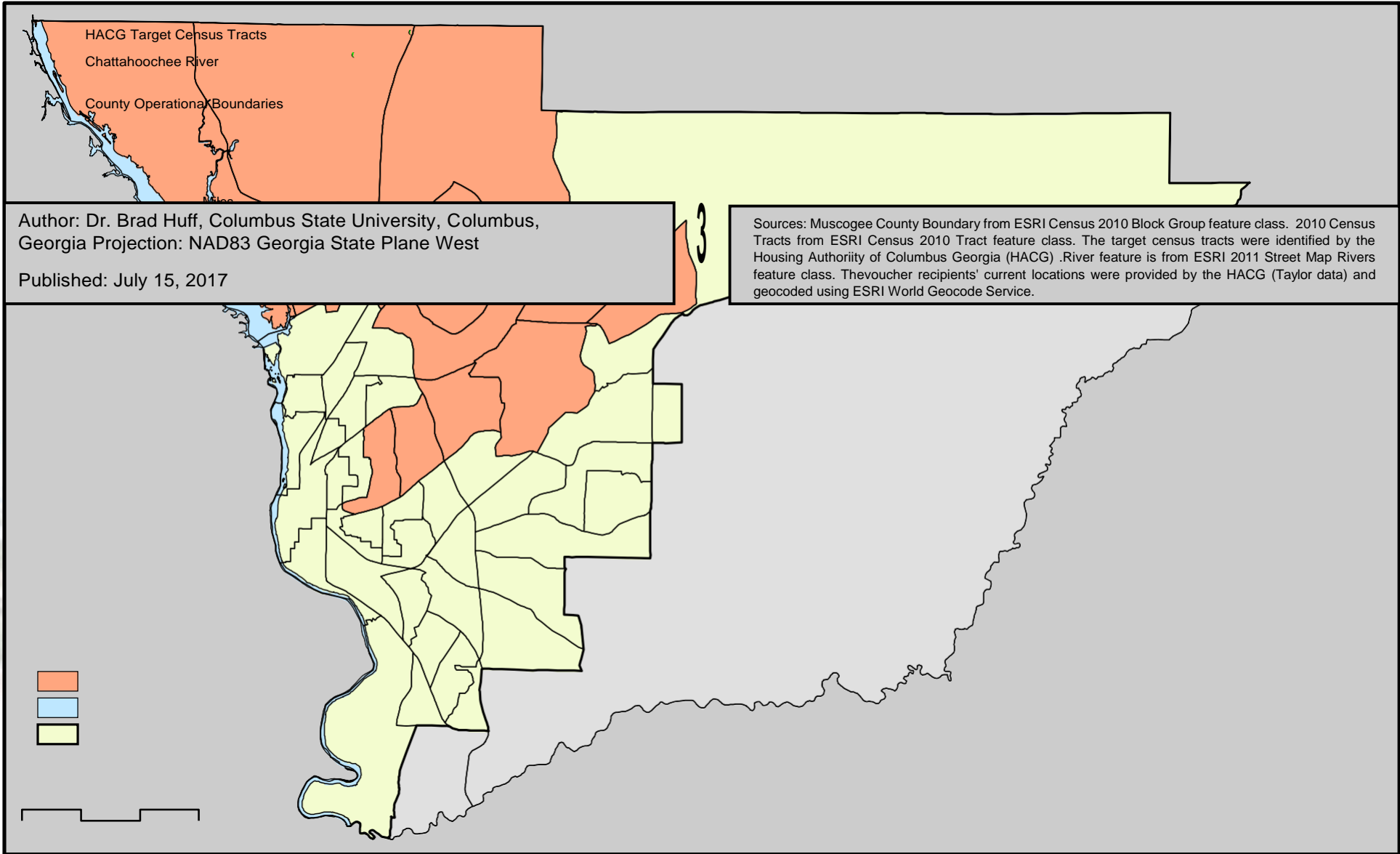
# Community Choice - Third Submission, Set 2 - Census Tracts



Voucher Recipient Current Addresses

Tract	Frequency	
Tract 008.00	1	
Tract 014.00	1	
Tract 020.00	1	
Tract 023.00	1	This analysis is based on the Submission 3, Set 2 Community Choice data submitted by the Housing Authority of Columbus Georgia (HACG).  45 respondents provided current addresses that could be reliably geocoded. In addition, HACG provided a list of census tracts it was targeting for relocations (displayed in Orange). 4 of the 45 respondents were located in the area of these target census tracts, 2 in Tract 101.06 and 2 in Tract 105.01.
Tract 025.00	1	
Tract 027.00	4	
Tract 028.00	1	
Tract 030.00	3	
Tract 032.00	1	
Tract 033.02	2	
Tract 034.00	3	
Tract 101.06	2	
Tract 105.01	2	
Tract 106.02	3	
Tract 106.05	2	
Tract 106.07	2	
Tract 106.08	3	
Tract 107.01	5	
Tract 107.02	3	
Tract 107.03	2	
Tract 114.00	1	
Tract 115.00	1	





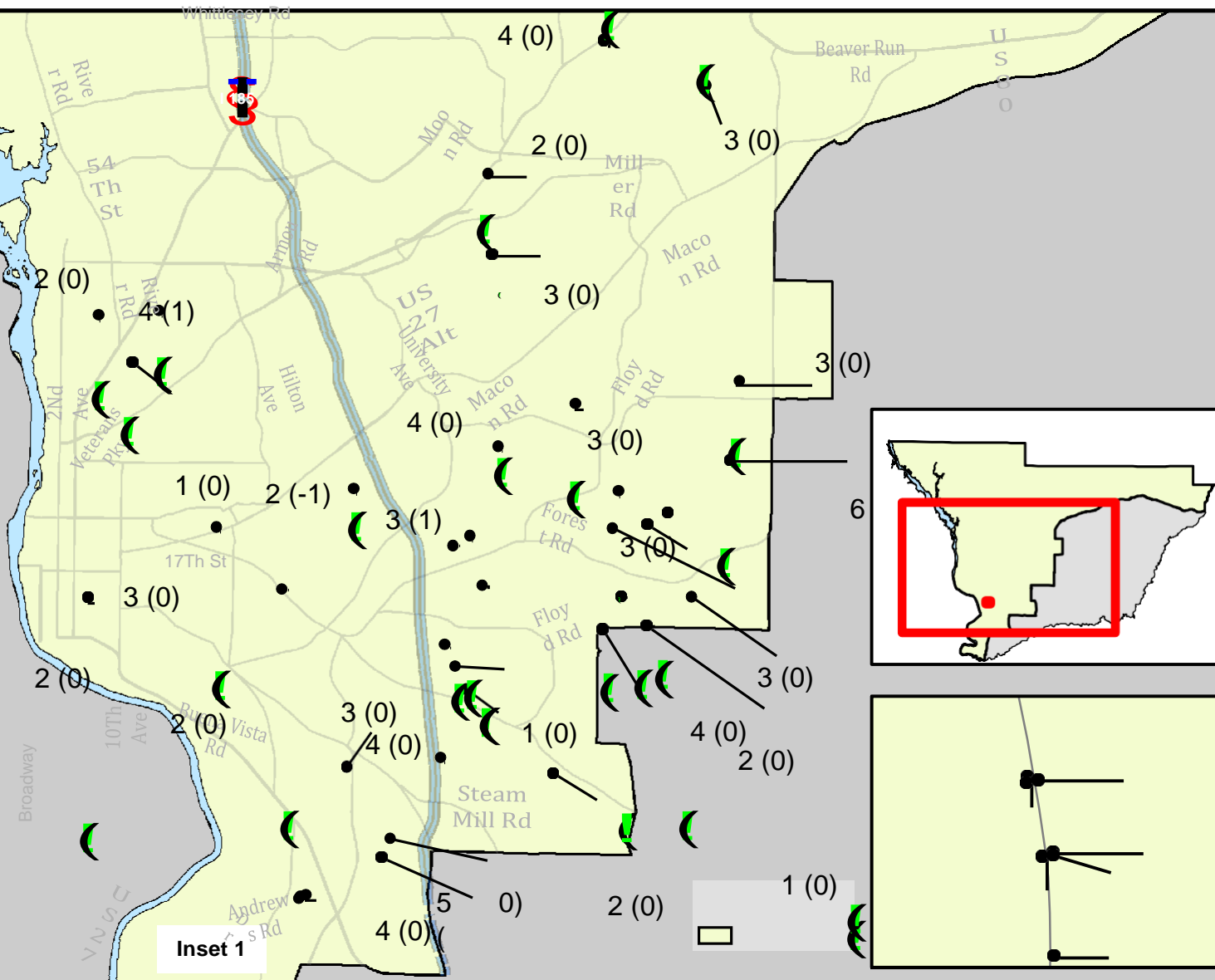
# Community Choice - Third Submission, Set 2 - Families

This analysis is based on Submission 3, Set 2, of the Community Choice data

provided by the Housing Authority of Columbus Georgia. 45 respondents provided current addresses

could be reliably geocoded. The inset map presents the data for an area where 7 respondents located in very close proximity to one another.

The labels display family size data. The current family size is presented and, in parenthesis, the change in the current family size from the family size



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4 (2)

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6 (0)

4 (0)

1 (0)

Fort Benning Rd

4 (1)

Current Addresses

2 (0)

2 (0)

County Operational Boundaries

1 (0)

3 (0)

Miles

0 1 2

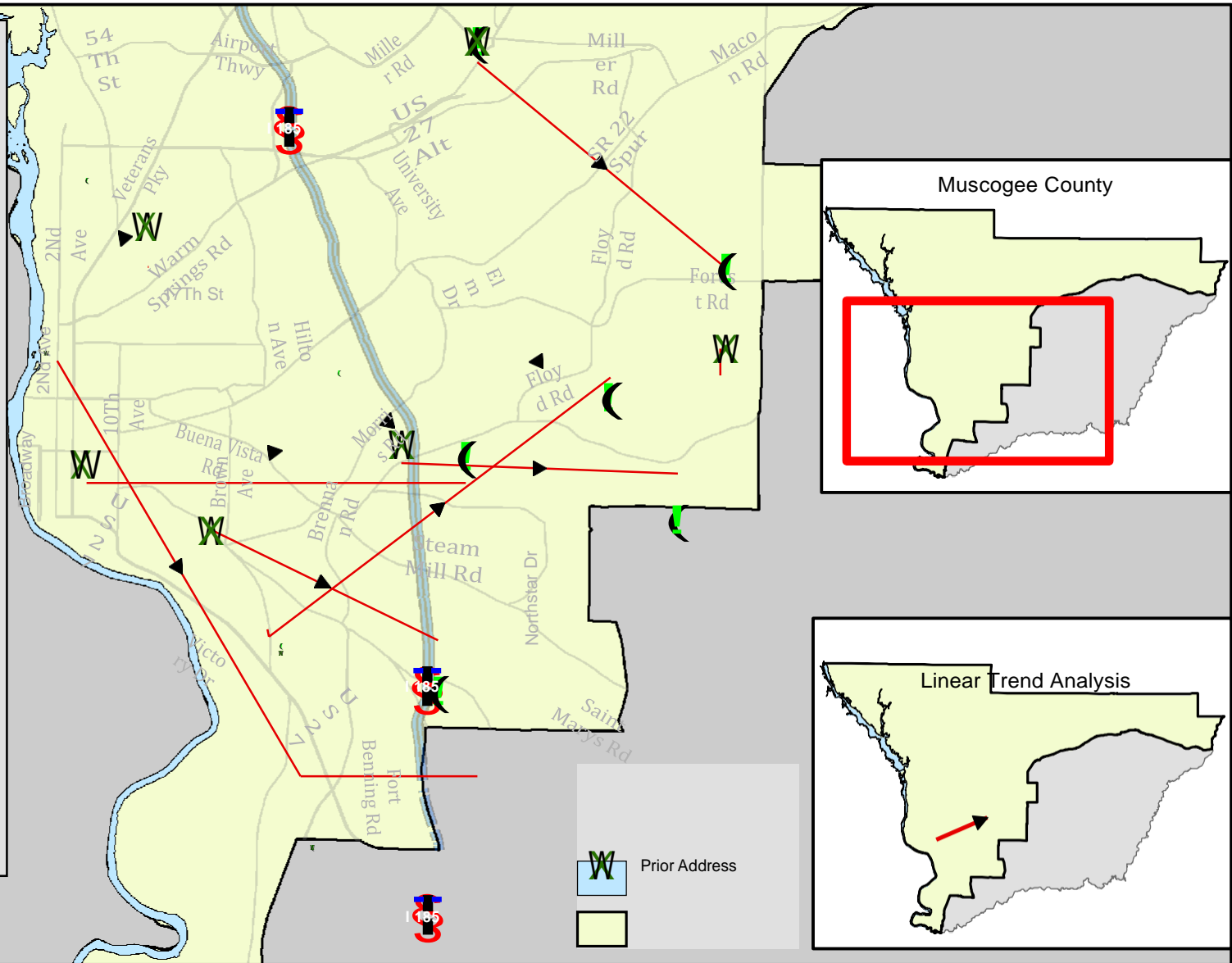
Author: Dr. Brad Huff, Columbus State University, Columbus, Georgia  
Projection: NAD83 Georgia State Plane West  
Published: July 14, 2017

Sources: Muscogee County Boundary from ESRI Census 2010 Block Group feature class. Streets from ESRI 2011 Street Map Streets feature class. River from ESRI 2011 Street Map Rivers feature class. The voucher recipients' current locations and family size were provided by the Housing Authority of Columbus, Georgia and geocoded using ESRI World Geocode Service.


# Community Choice - Third Submission, Set 2 - Relocations

45 respondents were interviewed concerning their residential locations funded by the Community Choice voucher program in Year 3 and reported in the Submission 3, Set 2 data. Previous and Current addresses for all 45 repondents could be reliably geocoded. 10 respondents relocated with their vouchers and 35 did not relocate. Given the low number of relocations, this information should be regarded strictly as descriptive. The minimum relocation was 390 feet (.07 mile), the maximum relocation was 7.37 miles, the average relocation was 3.35 miles, and most respondents moved less than 5.3 miles. This is generally consistent with relocation distances found in the Submission 2 (Taylor) data.

The linear trend analysis of relocations indicates voucher recipients moved generally east and slightly north. The eastward trend is, again, consistent with finding in the Submission 2





 Current Address

S Lumpkin  
Rd

Chattahoochee River

County Operational  
Boundaries

Miles

0 1 2

Author: Dr. Brad Huff, Columbus State University, Columbus,  
Georgia Projection: NAD83 Georgia State Plane West

Published: July 14, 2017

Document Name: GP\_Community\_Choice\_From\_To\_Year\_3

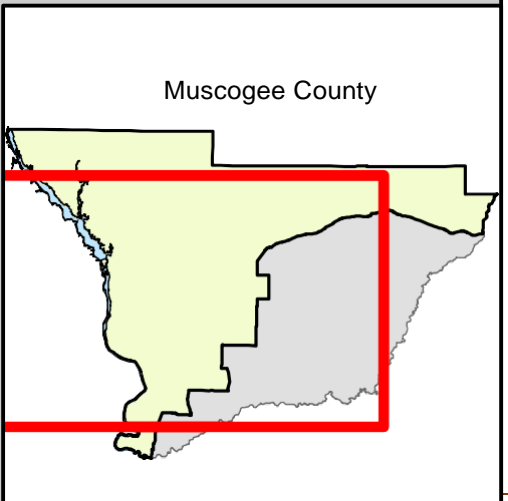
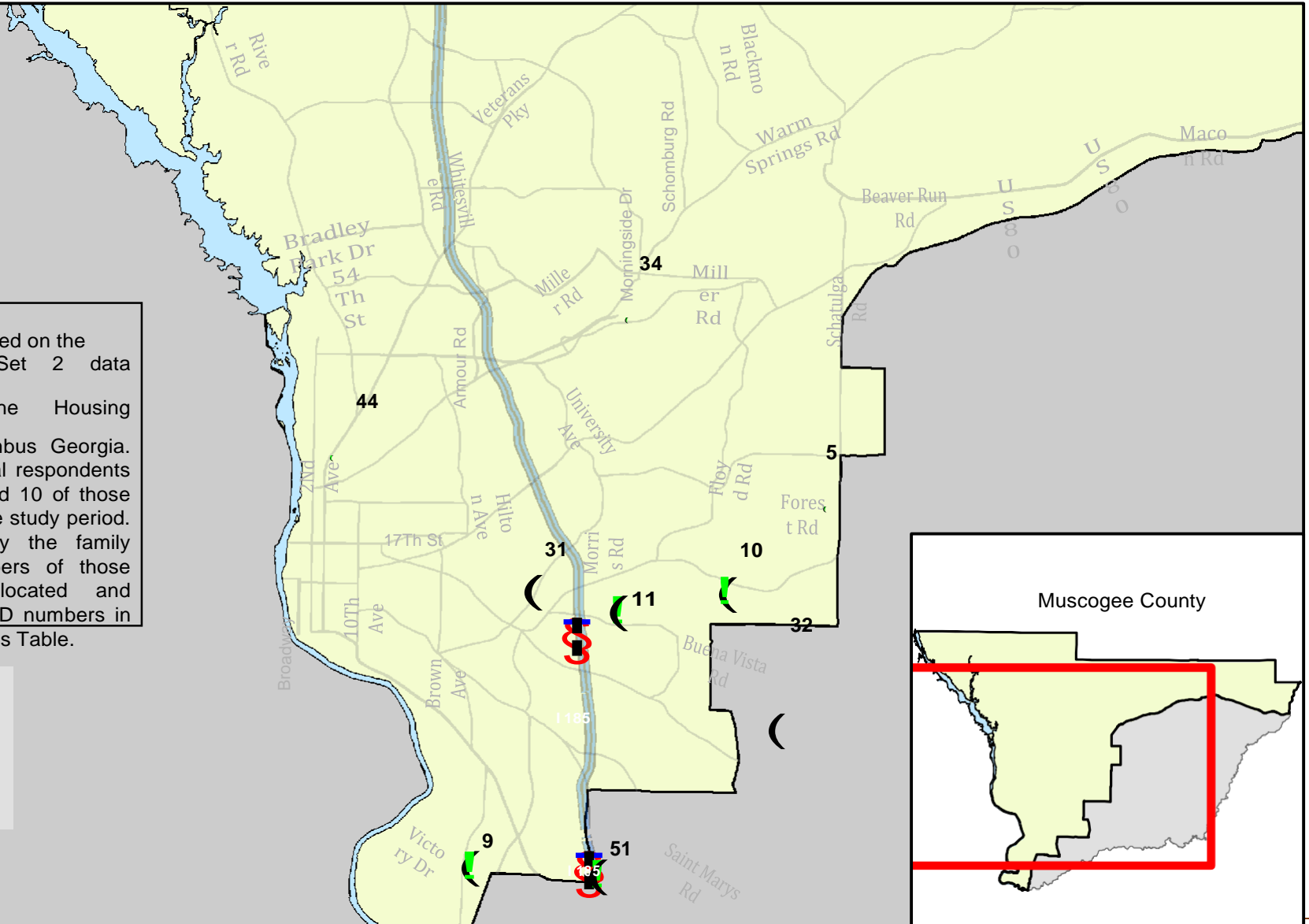
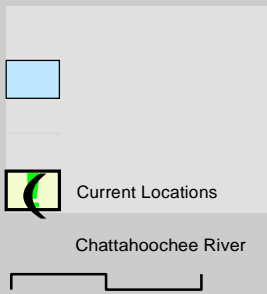
Sources: Muscogee County Boundary from ESRI Census 2010 Block Group feature class. Streets from ESRI 2011 Street Map Streets feature class. River from ESRI 2011 Street Map Rivers feature class. The voucher recipients' current locations were provided by the Housing Authority of Columbus, Georgia and geocoded using ESRI World Geocode Service.



# Community Choice - Submissions 3 - Set 2

## Current Locations of Residents Who Relocated

This analysis is based on the Submission 3, Set 2 data provided by the Housing Authority of Columbus Georgia. There were 45 total respondents in the data set, and 10 of those relocated during the study period. The labels display the family identification numbers of those families who relocated and correlate with the ID numbers in the Amenity Analysis Table.



Streets

County Operational  
Boundaries

S Lumpkin  
Rd 50



Miles

0 1 2

Author: Dr. Brad Huff, Columbus State University, Columbus,  
Georgia Projection: NAD83 Georgia State Plane West

Published: July 5, 2017

Document Name: TH\_Community\_Current\_Location\_Submission\_3\_Set\_2\_Amenities

Sources: Muscogee County Boundary from ESRI Census 2010 Block Group feature class. Streets from ESRI 2011 Street Map Streets feature class. River from ESRI 2011 Street Map Rivers feature class. The voucher recipients' current locations were provided by the Housing Authority of Columbus, Georgia and geocoded using ESRI World Geocode Service.



Amenities Report  
Submission 3, Set 2  
Relocations

ID	5	9	10	11	31	32	34
<b>Current Grocery</b>	7645	2410	1954	1420	2539	7787	3727
<b>Previous Grocery</b>	3727	2153	2153	1920	6704	195	1119
<b>Diff</b>	3918	257	-199	-500	-4165	7592	2608
<b>Current Medical</b>	4197	2518	4913	5986	960	7074	11290
<b>Medical_PN</b>	11290	2140	2140	4189	1355	1983	4182
<b>Diff</b>	-7093	378	2773	1797	-395	5091	7108
<b>Current Retail</b>	5079	1276	1700	1151	507	1377	1041
<b>Previous Retail</b>	1041	1218	1218	900	2034	186	342
<b>Diff</b>	4038	58	482	251	-1527	1191	699
<b>Current Retail Count</b>	0	21	5	30	38	1	17
<b>Previous Retail Count</b>	17	18	18	29	1	18	45
<b>Diff</b>	-17	3	-13	1	37	-17	-28
<b>Current Banks</b>	4098	1276	2772	933	1064	2896	871
<b>Previous Banks</b>	871	1600	1600	1023	6862	1262	342
<b>Diff</b>	3227	-324	1172	-90	-5798	1634	529
<b>Current Social Assistance</b>	2048	2032	1027	1502	414	1243	1234
<b>Previous Social Assistance</b>	1234	2117	2117	986	3030	195	342
<b>Diff</b>	814	-85	-1090	516	-2616	1048	892
<b>Current Food Services</b>	4745	1990	1954	1072	1064	5654	871
<b>Previous Food Services</b>	871	1600	1600	1086	2537	1396	342
<b>Diff</b>	3874	390	354	-14	-1473	4258	529
<b>Current Nursing Care</b>	2386	787	2727	3934	5063	830	4931
<b>Previous Nursing Care</b>	4931	397	397	1959	4638	4537	7188
<b>Diff</b>	-2545	390	2330	1975	425	-3707	-2257
<b>Current Bus Outbound</b>	1865	20	9165	6294	205	11130	2838
<b>Previous Bus Outbound</b>	2838	115	115	785	4197	2906	7
<b>Diff</b>	-973	-95	9050	5509	-3992	8224	2831
<b>Current Bus Inbound</b>	16833	1292	14694	6687	2218	16109	928
<b>Previous Bus Inbound</b>	928	1369	1369	875	19813	3192	62
<b>Diff</b>	15905	-77	13325	5812	-17595	12917	866

Amenities Report  
Submission 3, Set 2  
Relocations

ID	44	50	51	Mean	Median
<b>Current Grocery</b>	1322	1119	3937	3386	2475
<b>Previous Grocery</b>	827	3644	4279	2672	2153
<b>Diff</b>	495	-2525	-342	714	29
<b>Current Medical</b>	5234	4182	6045	5240	5074
<b>Medical_PN</b>	1880	1942	7571	3867	2140
<b>Diff</b>	3354	2240	-1526	1373	2019
<b>Current Retail</b>	1108	342	345	1393	1130
<b>Previous Retail</b>	827	903	1224	989	972
<b>Diff</b>	281	-561	-879	403	266
<b>Current Retail Count</b>	40	45	8	21	19
<b>Previous Retail Count</b>	18	22	9	20	18
<b>Diff</b>	22	23	-1	1	0
<b>Current Banks</b>	1322	342	1522	1710	1299
<b>Previous Banks</b>	1395	1029	932	1692	1146
<b>Diff</b>	-73	-687	590	18	228
<b>Current Social Assistance</b>	858	342	1934	1263	1239
<b>Previous Social Assistance</b>	188	459	12	1068	723
<b>Diff</b>	670	-117	1922	195	593
<b>Current Food Services</b>	2104	342	1800	2160	1877
<b>Previous Food Services</b>	827	718	1450	1243	1241
<b>Diff</b>	1277	-376	350	917	372
<b>Current Nursing Care</b>	2705	7188	2203	3275	2716
<b>Previous Nursing Care</b>	4438	582	4316	3338	4377
<b>Diff</b>	-1733	6606	-2113	-63	-672
<b>Current Bus Outbound</b>	880	7	1484	3389	1675
<b>Previous Bus Outbound</b>	834	1682	42	1352	810
<b>Diff</b>	46	-1675	1442	2037	744
<b>Current Bus Inbound</b>	922	62	1454	6120	1836
<b>Previous Bus Inbound</b>	790	1420	107	2993	1149
<b>Diff</b>	132	-1358	1347	3127	1107



School CCRPI Report  
Submission 3, Set 2  
Relocations

ID_2	5	9	10	11	31	32	34
<b>Current Elementary</b>	58.6	47.8	54.7	61.9	58	59.5	87
<b>Previous Elementary</b>	87	47.8	47.8	76.9	59.5	61.9	59.7
<b>Diff</b>	-28.4	0	6.9	-15	-1.5	-2.4	27.3
<b>Current Middle</b>	70	52.8	55.5	52.9	67.5	55.5	61.5
<b>Previous Middle</b>	61.5	52.8	52.8	57	55.5	52.9	57
<b>Diff</b>	8.5	0	2.7	-4.1	12	2.6	4.5
<b>Current High</b>	62.7	68.3	62.7	62.7	81.7	62.7	81.7
<b>Previous High</b>	81.7	68.3	68.3	76.4	62.7	68.3	61.7
<b>Diff</b>	-19	0	-5.6	-13.7	19	-5.6	20

School  
CCRPI  
Report  
Submission  
3, Set 2  
Relocatio  
ns

ID_2	44	50	51	Mean	Median
<b>Current Elementary</b>	63.8	59.7	52.1	60.31	59.05
<b>Previous Elementary</b>	74.4	76.9	52.1	64.4	60.8
<b>Diff</b>	-10.6	-17.2	0	-4.09	-1.95
<b>Current Middle</b>	66	57	57	59.57	57
<b>Previous Middle</b>	66	73.4	52.8	58.17	56.25
<b>Diff</b>	0	-16.4	4.2	1.4	2.65
<b>Current High</b>	76.4	61.7	68.3	68.89	65.5
<b>Previous High</b>	76.4	76.4	68.3	70.85	68.3
<b>Diff</b>	0	-14.7	0	-1.96	-2.8