The Mission of HACG is to be the foremost provider of quality, affordable housing in the Columbus region by developing, revitalizing, and managing contemporary housing communities.



Fiscal Year End 2021

July 1, 2020 – June 30, 2021

HUD Submission: September 24, 2021



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SECTION I. INTRODUCTION

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B. OVERVIEW

The Housing Authority of Columbus, Georgia (HACG) is a housing industry innovator located in the Chattahoochee Valley in Muscogee County, in western Georgia. HACG was created in 1938. HACG is a public body, both corporate and politic, governed by a seven-member Board of Commissioners (Board or BoC) appointed to terms by the Mayor of the Columbus Consolidated Government.

The Mission of HACG is to be the foremost provider of quality, affordable housing in the Columbus region by developing, revitalizing, and managing contemporary housing communities. HACG is one of the 39 original Moving-to-Work Demonstration (MTW) Program Public Housing Agencies/Authorities (PHAs) nationwide. HACG entered into an MTW Agreement with the US Department of Housing and Urban Development (HUD), effective July 3, 2013. On April 14, 2016, the agreement was extended to the end of HACG's fiscal year 2028. HACG signed the Third Amendment to the Standard MTW Agreement on March 25, 2020.

In accordance with its MTW agreement, HACG submits this Annual MTW Report to HUD's MTW Office to provide updates on MTW and Non-MTW goals and objectives for fiscal year ending (FYE) 2021.

MTW SHORT-TERM GOALS AND OBJECTIVES

The following narrative addresses short-term goals and objectives during the reporting period of July 1, 2020 thru June 30, 2021. Some goals and objectives overlap with non-MTW goals and objectives. Such goals and objectives are listed under its primary intent. This past year, we:

- ➤ Maximized use of single-fund budget with full flexibility by combining 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.
- ➤ Continue to 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 Yardi¹ trainers to increase capacity for Yardi end-users
 - Cross reference HUD-approved MTW Activities with published guidance documents to ensure approved MTW Authorizations are relevant and necessary
 - Cross reference HACG-closed MTW Activities with published guidance documents to acknowledge obsolescence of HUD-approved MTW Authorizations

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¹ HACG switched tracking software to Yardi in FYE2015

• HACG's current list of active activities include:

Activity Number	Approval Year	Activity Description	Activity Status - June 30
2014.02	2014	Innovations to Reduce Homelessness	Active, data being collected and reported
2014.03	2014	Administrative Reforms (HCV elements Only)	Active, data being collected and reported
2014.04	2014	Administrative Efficiency	Active, data being collected and reported
2015.02	2015	Portability Restrictions	Active, data being collected and reported
2015.03	2015	Simplify Utility Allowance Calculation	Active, data being collected and reported
2015.04	2015	Cap Childcare Deductions	Active, data being collected and reported
2016.01	2016	Next Step Vouchers	Active, data being collected and reported
2016.02	2016	Non-Competitive Project-Basing Process	Active, data being collected and reported
2016.03	2016	Project-Basing Flexibilities	Active, data being collected and reported
2018.01	2018	Eliminate/Reduce Interim Certification Examinations	Active, data being collected and reported
2018.02	2018	Site-Based Housing Flexibility (formerly - Over-House 1 BR Eligible Families in 2 BR Units)	Active, data being collected and reported
2019.01	2019	Minimum Rent Increase/Utility Reimbursement Payment (URP) Decrease	Active, data being collected and reported
2020.01	2020	Sponsor-Based Emergency Voucher Program (EVP)	Active, data being collected and reported

NON-MTW SHORT-TERM GOALS AND OBJECTIVES

- ➤ HACG met the requirements of HUD
 - Maintenance of financial records, housing units, etc.
 - Implemented Flat Rent Mandate (80% of Fair Market Rent (FMR)) PH units only
- ➤ HACG met the requirements of SAC Demolition
 - Completed the necessary requirements for relocation of Chase Homes Residents
 - Completed the necessary requirements for relocation of 6 units at Elizabeth Canty Homes
 - In Process of converting remaining stock of PH units to RAD PBV
 - Update, as applicable, modernization plans for next conversion phases
 - Warren Williams (160); George Rivers (24); and Elizabeth Canty (249 units)

- Determine appropriate funding in order to convert above listed units
 - Modernization work is estimated at \$40,000/unit
 - Use of MTW Block Grant funds is considered (funds will be available from HUD held Section 8 reserves)
- In Process of finalizing RAD conversion plan for the following remaining PH units
 - Columbus Commons (31); and Patriot Pointe (24)
- ➤ HACG met the requirements of Georgia Department of Community Affairs (DCA)
 - Design and implemented supportive services programming in compliance with appropriate DCA Qualified Allocation Plan (QAP)
 - <u>Family Sites:</u> E.F. Farley (102 units); E.J. Knight Gardens (52); and Luther Wilson (289)
 - Senior Sites: E.J. Knight Senior (40 units) and Brown 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 Rehabilitation Projects: Warren Williams (160) and George Rivers (24)
 - RAD Rehabilitation Projects: Elizabeth Canty (249)
 - 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
- ➤ HACG received subsidy for COVID-19 related expenses
 - HACG COVID-19 related expenses for fiscal year were \$261,766.60
 - HACG continued to implement safety measures due to COVID-19 that were in line with the CDC
- ➤ HACG received the national affordable housing accreditation from the Affordable Housing Accreditation Board (AHAB) on December 15, 2020. HACG was the eighth Public Housing Authority and the fourth MTW agency to receive this accreditation

MTW LONG-TERM GOALS AND OBJECTIVES

The following narrative addresses long-term goals and objectives during the reporting period of July 1, 2020 thru June 30, 2021. Some goals and objectives overlap with non-MTW goals and objectives. Such goals and objectives are listed under its primary intent.

- ➤ HACG continued to assess and evaluate ideas that maximize cost effectiveness, promote resident self-sufficiency, and expand housing choices, while meeting HACG's service delivery commitments.
- ➤ HACG still plans to present ideas consistent with demand/need for target groups such as:
 - Provide re-entry program in partnership with non-profit organization for exoffenders
 - HACG may construct or acquire a development for the purpose of Workforce Housing

- Provide an early childhood education program
- Develop incentive initiatives related to education or employment
- Establish an incentive for two parent households
- Create incentive and/or preference program for non-traditional "custodial parents"
- Develop a program to "graduate" families off assistance to homeownership, affordable market units or workforce housing
- Create a different rent calculation for elderly, employed and similar families
- ➤ HACG has decided not to pursue a MTW activity regarding establishing a minimum earned income due to COVID-19
- ➤ HACG will be utilizing some MTW funds or charge the properties for lease enforcement personnel beginning in Fall of 2021
- ➤ Continue to position HACG to become designated as a Regional MTW Agency.
- ➤ Change Agency's fiscal year
 - HACG is considering moving to a calendar fiscal year end to December for fiscal year 2023 if it is beneficial
 - Review fiscal years of partner agencies e.g., Federal, State, contracted PHAs, etc.
 - Must receive approval from appropriate governing body to change fiscal year

NON-MTW LONG TERM 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
- ➤ Redevelopment Project: Chase (108 units)
 - Completed demolition and construction of new development is estimated to be completed by December 31, 2022.
- ➤ General Partner Joint Venture Agreement between HACG and Macon Housing Authority
 - HACG signed an agreement with the Macon Housing Authority as a Co-General Partner in a Joint Venture to co-develop and manage a 72 unit elderly complex on Warm Springs Road, Columbus, GA.
- ➤ Meet requirements of DCA
 - Design and implement supportive services programming in compliance with appropriate DCA QAP (Qualified Allocation Plan)
 - <u>Family sites:</u> Chase new development (102 units 91 affordable, 11 market and 76 vouchers) and Columbus Commons (31)
 - <u>Senior sites:</u> 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
- Improve collection rate of payment agreements with current and former program participants

(II) GENERAL OPERATING INFORMATION

ANNUAL MTW REPORT

A. HOUSING STOCK INFORMATION

i. Actual New Project Based Vouchers

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

PROPERTY NAME	NUMB VOUCHER PROJECT	RS NEWLY	STATUS AT END OF PLAN YEAR**	RAD?	DESCRIPTION OF PROJECT
	Planned*	Actual			
GA004000405 – Warren Williams	184	0	N/A	Yes	RAD Conversion
GA004000407 – Louis Chase (Mill Village)	60	76	Committed	No	HCV/PBV
GA004000408 – Elizabeth Canty	249	0	N/A	Yes	RAD Conversion
GA004000423 – Patriot Pointe	24	0	N/A	Yes	RAD Conversion
GA004000424 – Columbus Commons	31	0	N/A	Yes	RAD Conversion

548 76

Planned/Actual Total Vouchers Newly Project-Based

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

In FY 2021, the difference between the Planned and Actual Existing number of vouchers project-based is 548. HACG is in the process of building a new development with 76 new PBV's, which an AHAP agreement has been executed. The construction should be completed by December 2022. Also, HACG was unable to convert 488 planned PH units to long-term Section 8 assisted PBV units during the planned year.

^{*} Figures in the "Planned" column should match the corresponding Annual MTW Plan.

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

ii. Actual Existing Project Based Vouchers

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

PROPERTY NAME	NUMB PROJ BAS VOUC	ECT- ED HERS	STATUS AT END OF PLAN YEAR**	RAD?	DESCRIPTION OF PROJECT
	Planned*	Actual			
GA004000406 – Luther C. Wilson	288	288	Leased/Issued	Yes	Former PH Units converted to PBV units under RAD Program
GA004000410 – E.E. Farley	102	102	Leased/Issued	Yes	Former PH Units converted to PBV units under RAD Program
GA004000412 - Brown Nicholson	100	100	Leased/Issued	Yes	Former PH Units converted to PBV units under RAD Program
GA004000416 – E. J. Knight	40	40	Leased/Issued	Yes	Former PH Units converted to PBV units under RAD Program
GA004000417 – E. J. Knight	52	52	Leased/Issued	Yes	Former PH Units converted to PBV units under RAD Program
GA004000418 – Ashley Station I	73	73	Leased/Issued	Yes	Former PH Units converted to PBV units under RAD Program
GA004000419 – Ashley Station II	73	73	Leased/Issued	Yes	Former PH Units converted to PBV units under RAD Program
GA004000420 – Arbor Pointe I	93	93	Leased/Issued	Yes No	18 PH Units converted to RAD PBV 75 HCV PBV Units Mixed Income
GA004000421 – Arbor Pointe II	93	93	Leased/Issued	Yes No	18 PH Units converted to RAD PBV 75 HCV PBV Units Mixed Income
GA004000422 – Arbor Pointe III (Cottages)	120	120	Leased/Issued	Yes No	19 PH Units converted to RAD PBV 101 HCV PBV Units Mixed Income
GA004000423 – Patriot Pointe	71	71	Leased/Issued	No	Existing PBV units in Mixed Income Community
GA004000424 – Columbus Commons	60	60	Leased/Issued	No	Existing PBV units in Mixed Income Community
GA004000630 – Willow Glen 28 28		Leased/Issued	No	Existing PBV units in Permanent Supportive Housing (PSH) Community	
	1193	1193			

1193 Planned/Actual Total Existing Project-Based Vouchers

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

There are no differences between the Planned and the Actual Existing Number of Vouchers Project-Based.

iii. Actual Other Changes to MTW Housing Stock in the Plan Year

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

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

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

ACTUAL OTHER CHANGES TO MTW HOUSING STOCK IN THE PLAN YEAR

There were changes in the housing stock for FYE 2021; Demolished 108 units at Chase Homes and received 108 TPV's. HACG also received 6 TPVs for units under demolition at Elizabeth Canty Homes and 20 additional VASH Vouchers.

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

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

GENERAL DESCRIPTION OF ALL ACTUAL CAPITAL EXPENDITURES DURING THE PLAN YEAR

HACG planned to expend approximately \$15M on capital expenditures during Fiscal Year 2021, with majority being allocated to the completion of HACG's Public Housing (PH) portfolio conversion under RAD and a 9% tax credit project. Actual expenditures totaled \$1,074,377 which consist of expenses toward RAD II predevelopment cost, purchase heating and air units and gas package units, and office furniture. HACG's planned expenditure of the remaining \$13M during FY2021 for a property conversion activity was delayed because two of the three remaining PH sites in HACG's RAD Portfolio award were each identified as partially lying within or having access that lay within the FEMA-established Regulatory Floodway, therefore rendering those units ineligible for conversion under HUD's RAD program. HACG is currently working with FEMA to resolve the floodway issues.

B. LEASING INFORMATION

i. Actual Number of Households Served

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

NUMBER OF HOUSEHOLDS SERVED THROUGH:	MON	OF UNIT NTHS D/LEASED*	NUMB HOUSEHOLI	
	Planned^^	Actual	Planned^^	Actual
MTW Public Housing Units Leased	5,520	5,800	460	483
MTW Housing Choice Vouchers (HCV) Utilized	41,616	39,150	3,468	3,263
Local, Non-Traditional: Tenant-Based	0	0	0	0
Local, Non-Traditional: Property-Based	0	0	0	0
Local, Non-Traditional: Homeownership	0	0	0	0
Planned / Actual Totals	47,136	44,950	3,928	3,746

- * "Planned Number of Unit Months Occupied/Leased" is the total number of months the MTW PHA planned to have leased/occupied in each category throughout the full Plan Year (as shown in the Annual MTW Plan).
- ** "Planned Number of Households to be Served" is calculated by dividing the "Planned Number of Unit Months Occupied/Leased" by the number of months in the Plan Year (as shown in the Annual MTW Plan).
- ^^ Figures and text in the "Planned" column should match the corresponding Annual MTW Plan.

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

HACG difference between the planned and actual households served by program is due to several factors. HACG Public Housing property at Chase Homes received demolition approval from HUD and received 108 Tenant Protection Vouchers (TPV). HACG also received an additional 269 TPVs for Ralston Towers residents in January 2020, therefore leasing of vouchers were higher than expected and the housing market was saturated with families looking for affordable housing. Also, the eviction moratorium contributed to hosing market saturation.

LOCAL, NON- TRADITIONAL CATEGORY	MTW ACTIVITY NAME/NUMBER	NUMBER OF UNIT MONTHS OCCUPIED/LEASED*		NUMBER OF HOUSEHOLDS TO BE SERVED*	
CATEGORY		Planned^^	Actual	Planned^^	Actual
Tenant-Based	N/A	0	0	0	0
Property-Based	N/A	0	0	0	0
Homeownership	N/A	0	0	0	0
	Planned/Actual Totals	0	0	0	0

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

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

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

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

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

HOUSING PROGRAM	DESCRIPTION OF ACTUAL LEASING ISSUES AND SOLUTIONS
MTW Public Housing	Significantly higher turnover of units in our Public Housing units. HACG completed the installation of a camera system at Elizabeth Canty Homes where vacancies were excessive due to perceived criminal activity.
MTW Housing Choice Voucher	Private sector rental housing market was saturated due to so many families looking for affordable housing. COVI-19 and the eviction moratorium contributed to houses/apartments not being available. Need to recruit more landlords and implement new program admissions process.
Local, Non-Traditional	N/A

C. WAITING LIST INFORMATION

i. Actual Waiting List Information

Snapshot information on the actual status of MTW waiting lists at the end of the Plan Year. The "Description" column should detail the structure of the waiting list and the population(s) served.

WAITING LIST NAME	DESCRIPTION	NUMBER OF HOUSEHOLDS ON WAITING LIST	WAITING LIST OPEN, PARTIALLY OPEN OR CLOSED	WAS THE WAITING LIST OPENED DURING THE PLAN YEAR
Federal MTW Housing Choice Vouchers	Community Wide	365	Closed	Yes
MTW Rapid Rehousing Vouchers; MTW Next Step Vouchers	Program Specific	By referral from service provider	Partially Open	Yes
Federal MTW Public Housing Units; Converted PH Units to RAD Project-Based Vouchers	Merged	6,493	Open	Yes

Please describe any duplication of applicants across waiting lists:

Applicants for Public Housing may also be included on the RAD Community Wide PBV Waitlist

ii. Actual Changes to Waiting List in the Plan Year

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

WAITING LIST NAME	DESCRIPTION OF ACTUAL CHANGES TO WAITING LIST
Federal MTW Housing Choice Vouchers	Opened October 5, 2020, Closed October 5, 2020
N/A	N/A

D. INFORMATION ON STATUTORY OBJECTIVES AND REQUIREMENTS

i. 75% of Families Assisted Are Very Low Income

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

INCOME LEVEL	NUMBER OF LOCAL, NON- TRADITIONAL HOUSEHOLDS ADMITTED IN THE PLAN YEAR
80%-50% Area Median Income	N/A
49%-30% Area Median Income	N/A
Below 30% Area Median Income	N/A
Total Local, Non-Traditional Households Admitted	N/A

ii. Maintain Comparable Mix

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

	BASELINE MIX OF FAMILY SIZES SERVED (upon entry to MTW)							
FAMILY SIZE	OCCUPIED PUBLIC HOUSING UNITS	UTILIZED HCVs	NON-MTW ADJUSTMENTS*	BASELINE MIX NUMBER	BASELINE MIX PERCENTAGE			
1 Person	714	690	0	1404	35.0%			
2 Person	356	416	0	772	19.1%			
3 Person	280	542	0	822	20.4%			
4 Person	196	374	0	570	14.1%			
5 Person	102	197	0	299	7.4%			
6+ Person	40	114	0	154	4.0%			
TOTAL	1,688	2,333	0	4,021	100%			

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

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

HACG did not have any Non-MTW Adjustments during the reporting period.

MIX OF FAMILY SIZES SERVED (in Plan Year)						
FAMILY SIZE	BASELINE MIX PERCENTAGE ** NUMBER OF HOUSEHOLDS SERVED IN PLAN YEAR^ YEAR^			PERCENTAGE CHANGE FROM BASELINE YEAR TO CURRENT PLAN YEAR		
1 Person	35.0%	1554	41.5%	6.5%		
2 Person	19.1%	651	17.4%	-1.7%		
3 Person	20.4%	671	17.9%	-2.5%		
4 Person	14.1%	461	12.3%	-1.8%		
5 Person	erson 7.4% 225 6.0% -1.4%					
6+ Person	4.0%	184	4.9%	0.9%		
TOTAL	100%	3,746	100%	-5.5%		

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

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

The number of households served is lower than the baseline due to HACG utilizing funding flexibility. Also, HACG received additional vouchers during a time that the housing market was saturated with families looking for affordable housing during the COVID-19 pandemic.

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

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

MTW ACTIVITY NAME/NUMBER	NUMBER OF HOUSEHOLDS TRANSITIONED TO SELF SUFFICIENCY*	MTW PHA LOCAL DEFINITION OF SELF SUFFICIENCY
Innovations to Reduce Homelessness / 2014.02	45	12 Consecutive months of stability (off-the-street)
Innovations to Reduce Homelessness/2014.02	7	Completion of 24-month of active case management
Next Step Vouchers (NSV) / 2016.01	0	Completion of 36-months of active case management
	0	(Households Duplicated Across MTW Activities)
	52	Total Households Transitioned to Self Sufficiency

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

SECTION III – Proposed MTW Activities

All proposed activities that were granted approval by HUD are reported in Section IV as "Approved Activities".

SECTION IV – Approved MTW Activities

A. <u>IMPLEMENTED ACTIVITIES</u>

Activity 2014.02 - Innovations to Reduce Homelessness

- i. **Plan Year Approved, Implemented, and Amended:** Activity was introduced and Approved and Implemented in fiscal year 2014 (July 1. 2013 June 30, 2014).
- ii. **Description, Impact and Update:** The MTW Authorizations D.2.a, D.2.b, and D.4 listed in Attachment C of the MTW Agreement were used to designate up to 150 Tenant-Based Vouchers (TBVs) as MTW Rapid Rehousing Vouchers (RRVs) for properly referred chronically homeless families. This activity models the *Housing First* approach to quickly connect chronically homeless individuals and families to shelter and case management. Additionally, the authorizations allowed HACG to waive the minimum rent² for zero-

² Minimum rent waived for first 12-months of lease for newly admitted, unemployed, work-able veterans

income veterans, to create a Waiting List preference for veterans, and to create a Tiered Rent Schedule for veterans returning to the workforce.

The intent of the activity seeks to learn if the "rapid" housing concept reduces the homeless population in the area and if the voucher issuance, with required case management, helps to stabilize participating families. The activity collaborates efforts with Home for Good, the area's Continuum of Care Committee, service providers, and other organizations to house and case manage activity participants. Since the activity's approval, HACG has earmarked vouchers each fiscal year for this endeavor; the breakdown is tabled below:

Fiscal Year	Vouchers Designated	Rolling Voucher Count
FYE 2014	30	30
FYE 2015	50	80
FYE 2016	40	120
FYE 2017	30	150

As of June 30, 2021, this activity continues to assist the homeless population in the city of Columbus GA. HACG is pleased with the positive impact that this activity has made. HACG continued to strengthen the referral process through Home for Good (HfG) and delivery of case management services provided through several organizations such as; New Horizons Community Service Board, Chattahoochee Valley Jail Ministries, American Work, and Homeless Resource Network.

This activity has experienced a level of success not originally anticipated by HACG. The active families participating in this activity continues to maintain an average time of 2 years off-the-street. Even families terminated from this activity averaged 1.5 years of stability before they were terminated. This data seems to support the *Housing First* theory that once families are off the street, they can address other issues and begin the stabilization process.

HACG in conjunction with other service providers and Home for Good has reduced the number of chronically homeless drastically. In FY 2020, HACG expanded the focus beyond chronically to include homeless individuals. The positive impact of the activity continues to encourage HACG to administer this activity at a high-level.

This activity is on schedule and does not meet the definition of rent reform. The HUD Standard Metrics for this activity are on the next page.

SS #1: Increase in Household Income - Innovations to Reduce Homelessness					
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).	income of households affected by this policy prior to implementation of	Actual average earned income of households affected by this policy prior to implementation (in dollars).	Whether the outcome meets or exceeds the benchmark.	
	Total earned income of households affected by this policy = \$86,877	Expected total earned income of households affected by this policy = \$562,309	Actual total earned income of households affected by this policy = \$259,255		
Chronically Homeless households affected by	Number of households = 28 Average Earned	Expected number of households = 147 Expected Average Earned Income of	Actual number of households = 75 Actual Average Earned	Benchmark Not Achieved	
this policy.	Income of Households Affected by this Policy Prior to Implementation of the Activity:	Households Affected by this Policy After Implementation of the	Income of Households Affected by this Policy After Implementation of the Activity:		
	\$ 3,103	\$ 3,825	\$ 3,457		

SS #3: Increase in Positive Outcomes in Employment Status - Innovations to Reduce Homelessness					
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?	
	Number of work-able (19-61) households prior to implementation of the activity = 26 Number of work-able (19-61) households employed Fulltime = 1 Percentage of Work-Able Households Employed Full-Time Prior to Implementation of the Activity:	able (19-61) households after implementation of the activity = 144 Expected number of workable (19-61) households employed Fulltime = 18 Expected Percentage of Work-Able Households Employed Full-Time After Implementation of	able (19-61) households after implementation of the activity = 58 Actual number of work- able (19-61) households employed Fulltime = 9 Actual Percentage of	Exceeds Benchmark	
	3.8%	12.5%	15.5%		

SS #3: Increase in Positive Outcomes in Employment Status - Innovations to Reduce Homelessness					
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?	
Chronically Homeless Households Working Part Time	61) households employed Part Time = 7 Percentage of Work- Able Households Employed Part-Time	able (19-61) households after implementation of the activity = 144 Expected number of workable (19-61) households employed Part Time = 31 Expected Percentage of Work-Able Households Employed Part-Time	able (19-61) households after implementation of the activity = 58 Actual number of work- able (19-61) households employed Part Time = 6 Actual Percentage of	Benchmark Not Achieved	

SS #3: Increase in Positive Outcomes in Employment Status - Innovations to Reduce Homelessness					
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?	
	61) households prior to implementation of the	` '	Actual number of work- able (19-61) households after implementation of the activity = 58		
Chronically Homeless Households Unemployed	61) households	Expected number of work- able (19-61) households Unemployed = 75	Actual number of work- able (19-61) households Unemployed = 31	Benchmark Not Achieved	
	Percentage of Work-	Expected Percentage of	Actual Percentage of		
	Able Households	Work-Able Households			
	Unemployed Prior to	Unemployed After	Unemployed After		
	Implementation of the Activity:	Implementation of the Activity:	Implementation of the Activity:		
	69.2%	52.1%	53.4%		

SS #4: Households Removed from Temporary Assistance for Needy Families (TANF) - Innovations to Reduce Homelessness					
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?	
Number of households receiving TANF assistance (decrease).	Households receiving TANF prior to implementation of the activity (number)	Expected number of households receiving TANF after implementation of the activity (number).	Actual households receiving TANF after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.	
	Number of households in activity = 28	Expected number of households in activity after implementation = 147	Actual number of households in activity after implementation = 75		
Chronically Homeless Households Receiving TANF	Percent of households receiving TANF = 7.1%	Expected percent of households receiving TANF = 2.3%	Actual percent of households receiving TANF = 2.7%	Exceeds Benchmark	
TANF	Households Receiving TANF <i>Prior to</i> Implementation of the Activity:	Expected Households Receiving TANF After Implementation of the Activity:	Actual Households Receiving TANF After Implementation of the Activity:		
	2.0	3.4	2.0		

Unit of Measurement	Baseline			SS #8: Households Transitioned to Self Sufficiency - Innovations to Reduce Homelessness				
		Benchmark	Outcome	Benchmark Achieved?				
PHA may create one or more definitions for "self sufficiency" to use for this metric. Each time the PHA uses this metric, the	to self sufficiency (< <pha definition="" of="" self-<br="">sufficiency>>) prior to implementation of the activity (number). This</pha>	Expected households transitioned to self sufficiency (< <pha definition of self- sufficiency>>) after implementation of the activity (number).</pha 	Actual households transitioned to self sufficiency (< <pha definition of self- sufficiency>>) after implementation of the activity (number).</pha 	Whether the outcome meets or exceeds the benchmark.				
	months available = 8	Expected number of housing months available = 12	Actual number of housing months available = 12					
Number of Chronically	- C	Expected total number of housing months = 1350	Actual total number of housing months = 1965					
Homeless households transitioned to self sufficiency	Transitioned to Self- Sufficiency (Maintain Residency for 12 Consecutive Months or Longer) Prior to	Expected Households Transitioned to Self- Sufficiency (Maintain Residency for 12 Consecutive Months or Longer) After Implementation of the Activity:	Actual Households Transitioned to Self- Sufficiency (Maintain Residency for 12 Consecutive Months or Longer) After Implementation of the Activity: 45	Benchmark Not Achieved				

- iii. **Actual Non-Significant Changes:** HACG did not plan any Non-Significant Changes to this activity in its 2021 Annual MTW Plan.
- iv. **Actual Changes to Metrics and Data Collection:** HACG did not make any significant Changes to Metrics/Data Collection to this MTW Activity.
- v. **Actual Significant Changes:** HACG did not make any Significant Changes to this MTW Activity.
- vi. Challenges in Achieving Benchmarks and Possible Strategies: Where Benchmarks were Not Achieved, HACG primarily attributes these shortfalls to the local economy. Columbus' economy had begun experiencing some growth until the last four months of the fiscal year, when COVID-19 posed a serious public health risk and businesses were affected. Additionally, Columbus' unemployment rate (5.7%)³ continues to outpace GA cities of similar size, such as the City of Augusta-Richmond County (4.9%)³, a city of comparable size and government make-up, the City of Atlanta (5.5%)³, the State's Capitol, and the State of Georgia (4.4%)³.

Meanwhile, transition encompasses stabilization period – first 12-months and other periods that a chronically homeless individual/family may take more time to reach than a family that never experienced homelessness.

Activity 2014.03 – Administrative Reforms

- i. **Plan Year Approved, Implemented, and Amended:** This activity was Approved and Implemented in fiscal year 2014 (July 1, 2013 June 30, 2014), in the same fiscal period as approval.
- ii. **Description, Impact, and Update:** HACG uses MTW Authorizations D.2.b, D.3.a, and D.3.b to exclude asset income, to permit self-certification of assets, and to eliminate the income cap under the Housing Choice Voucher (HCV) Program. Under this activity, HACG seeks to learn if these streamlining measures help to promote cost efficiency and housing choice, while reducing the "evasion" perception felt by many HCV Program participants.

Asset income received from assets totaling less than \$50,000 are excluded from the income calculation. Once assets are verified, usually during the intake process, HCV participants can self-certify their assets during recertification examinations. Asset totals are subject to random verification. HCV Program participants with assets at or above the threshold will have the income received off assets included in their household income calculation and factored into their rent share.

³ Source: GA Department of Labor (GA DOL) Area Unemployment Rate and Labor Force Estimates

Under the conventional HCV requirements, families cannot use more than 40% of their income toward rent. Through this activity, HACG eliminates this cap and allows families to use up to 50% of their income towards rent. As a result, HACG essentially sets the rent burden cap at 50%. Under no circumstances will residents be allowed to use more than 50% of their income toward rent. This calculation is monitored at initial, annual, and interim examinations.

The feedback received to date indicates that staff and residents are supportive of this activity. HACG continues to administer multiple rental assistance programs simultaneously and the rules, requirements, and flexibilities sometimes blend together. Because of conversion activities under the Rental Assistance Demonstration (RAD) Program and HACG's use of Low-Income Housing Tax Credit (LIHTC) funds, HACG closed out the Public Housing (PH) element of the activity in FY 2017.

This activity remains on schedule as an HCV only activity. It does not meet the definition of rent reform and the HUD Standard Metrics for this activity are tabled below:

CE #1: Agency Cost Savings - Adminstrative Reforms						
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).	1	Actual cost of task after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.		
	Number of annual examinations: HCV = 2,155; PH = 1,497	Expected number of annual examinations: HCV = 1970	Actual number of annual examinations: HCV = 1738			
	Average time to complete examinations: HCV = 2.25 hours; PH = 2.25 hours	Expected average time to complete examinations: HCV = 1.83 hours	Actual average time to complete examinations: HCV = 1.0 hours			
Total cost of task (Certification Examinations) in dollars	Average hourly compensation: HCV Occupancy Specialists = \$24.76; PH Housing Managers = \$28.41	Expected average hourly compensation: HCV Occupancy Specialists = \$30.83	Actual average hourly compensation: HCV Occupancy Specialists = \$30.75	Exceeds Benchmark		
	Cost of Task <i>Prior to</i> Implementation of the Activity: \$ 107,874	After Implementation of	Actual Cost of Task After Implementation of the Activity: \$ 53,444			

CE #2: Staff Time Savings - Administrative Reforms					
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?	
Total time to complete the task in staff hours (decrease).	dedicated to the task prior to implementation of the	Expected amount of total staff time dedicated to the task after implementation of the activity (in hours).	staff time dedicated to the	Whether the outcome meets or exceeds the benchmark.	
	examinations: HCV =	Expected number of annual examinations: HCV = 1970	Actual number of annual examinations: HCV = 1,738		
Total time to complete the task (Certification Examinations) in staff	Average time to complete examinations: HCV = 2.25 hours; PH = 2.25 hours	Expected average time to complete examinations: HCV = 1.83 hours	Actual average time to complete examinations: HCV = 1.0 hours	Exceeds Benchmark	
hours	Total Staff Hours Dedicated to the Task Prior to Implementation of the Activity:	Expected Total Staff Hours Dedicated to the Task After Implementation of the Activity:	Actual Total Staff Hours Dedicated to the Task After Implementation of the Activity:		
	4,108.5	3,605.1	1,738.0		

CE #3: Decrease in Error Rate of Task Execution - Administrative Reforms					
eline	Benchmark	Outcome	Benchmark Achieved?		
r rate of task ementation of percentage).	1	Actual average error rate of task after implementation of the activity (percentage).	Whether the outcome meets or exceeds the benchmark.		
	HCV = 99 Expected number of errors noted: HCV = 15 Expected Average Error Rate of Task After Implementation of the Activity:	Rate of Task After Implementation of the Activity:	Benchmark Not Achieved		
l	tion of the	Implementation of the Activity:	Implementation of the Activity: Implementation of the Activity:		

CE #5: Increase in Tenant Rent Share - Administrative Reforms					
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?	
Tenant rental revenue in dollars (increase).	Ithe 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.	
Tenant rental revenue	Monthly tenant rent for HCV = \$314,834; PH = \$181,638	,	Actual monthly tenant rent for HCV = \$553,343		
	Average monthly housing units for HCV = 2155; PH = 1497	Expected average monthly housing units for HCV = 1970	Actual average monthly housing units for HCV = 3,086	Exceeds Benchmark	
	Tenant Rental Revenue Prior to Implementation of the Activity:	Expected Tenant Rental Revenue After Implementation of the Activity:	Actual Tenant Rental Revenue After Implementation of the Activity:		
	\$ 136	\$ 156	\$ 179		

HC #5: Increase in Resident Mobility - Administrative Reforms					
Baseline	Benchmark	Outcome	Benchmark Achieved?		
ds able to move r unit and/or mood of ty prior to tatation of the number). This 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.		
of HCV units = of HCV families of the 40% of ap = 17.0% olds Able to a Better Unit Neighborhood tunity <i>Prior to</i> entation of the	units = 2483 Expected percent of HCV families exceeding the 40% Income Cap = 13.2% Households Able to Move to a Better Unit and/or Neighborhood	Actual percent of HCV families exceeding the 40% Income Cap =8.2% Actual Households Able	Benchmark Not Achieved		
f is a policion of the control of th	HCV families the 40% p = 17.0% ds Able to Better Unit eighborhood unity <i>Prior to</i>	units = 2483 Expected percent of HCV families exceeding the 40% Income Cap = 13.2% ds Able to Better Unit eighborhood unity <i>Prior to</i> attation of the units = 2483 Expected percent of HCV families exceeding the 40% Income Cap = 13.2% Households Able to Move to a Better Unit and/or Neighborhood of Opportunity <i>After</i> Implementation of the	units = 2483 Expected percent of HCV families exceeding the 40% Income Cap = 13.2% HOW be to a Better Unit eighborhood unity <i>Prior to</i> that ation of the to the 40% Income Cap = 100 Income Ca		

- iii. **Actual Non-Significant Changes:** HACG did not plan any Non-Significant Changes to this activity in its 2021 Annual MTW Plan.
- iv. **Actual Changes to Metrics and Data Collection:** HACG did not make any non-significant Changes to Metrics/Data Collection to this MTW Activity.

- v. **Actual Significant Changes:** HACG did not make any Significant Changes to this MTW Activity.
- vi. **Challenges in Achieving Benchmarks and Possible Strategies:** Where Benchmarks were Not Achieved, HACG attributes these shortfalls to the COVID-19 pandemic.

Activity 2014.04 – Administrative Efficiency

- i. **Plan Year Approved, Implemented, and Amended:** was Approved and Implemented during fiscal year (FY) 2014 (July 1, 2013 June 30, 2014). The implementation process took effect on annual effective dates, so full implementation of this activity overlapped into FY 2015 (July 1, 2014 June 30, 2015).
- ii. **Description, Impact and Update:** HACG uses MTW Authorization D.1.c listed in Attachment C of the MTW Agreement to create local forms and restructure the review process of elderly and/or disabled families. From this activity, HACG seeks to learn if these actions promote efficiency within the recertification examination process.

With the ability to create and/or modify relevant forms for local use with minimal approval delay and move qualified families from an annual examination schedule to a triennial examination schedule, Housing Choice Voucher (HCV) Occupancy Specialists will have more time to spend with challenging, multi-family, multi-income, multi-program recertification examinations. Households must meet eligibility and income parameters:

A: Eligibility

Head-of-Household Classification	Definition
Elderly	Must be 62 or older prior to annual certification review
Disabled	Must meet disability definition and receive compensation for such
Elderly and Disabled	Must be 62 or older AND meet disability definition AND receive compensation for such

B: Income

Head-of-Household Income Source(s)				
Must be from fixed, stable income sources, such as:				
✓ Pension				
✓ Social Security (SS)				
✓ SS Disability Insurance (SSDI)				
✓ Veteran Affairs (VA) Benefits				

Note: Social Security Insurance (SSI) is available to non-workers or workers with limited work credit, e.g., minors, therefore, HACG cautions its Housing Managers and Occupancy Specialists to verify SSI recipient before adding household to the 3-year review schedule.

Households that include a fluctuating income source are returned to and remain on an annual recertification schedule regardless of if the Head-of-Household (HoH) meets the activity's definition.

Scenario examples that nullify 3-year review schedule are listed below:

Head-of-Household Classification	Household Income Source(s)	Comments
Elderly, Disabled, or Elderly and Disabled	Eligible income AND/OR ✓ Child Support ✓ Employment (FT, PT, etc.) ✓ Military Pay (Active or Reserve) ✓ PHA Stipend ✓ Unemployment ✓ And/or similar incomes	Ineligible for Triennial Review Schedule

Analysis of this activity attributes some of the impact to its portfolio conversion under the Rental Assistance Demonstration (RAD) Program and the use of Low-Income Housing Tax Credit (LIHTC) funds. These programs have requirements that make this activity flexibility null. Because of this, HACG closed-out the Public Housing (PH) elements of this activity in FY 2018.

This activity remains on schedule and meets the definition of rent reform. HACG has not received any written hardship requests. The HUD Standard Metrics for this activity are listed below:

CE #1: Agency Cost Savings - Administrative Efficiency					
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?	
Total cost of task in dollars (decrease).	implementation of the	Expected cost of task after implementation of the activity (in dollars).	Actual cost of task after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.	
Total cost of task (Certification Examinations) in dollars	examinations: HCV =	Expected number of annual examinations: HCV = 629	Actual number of annual examinations: HCV = 584		
		Expected average time to complete examinations: HCV = 1.33	Actual average time to complete examinations: HCV = 1.00		
	Occupancy Specialists = \$24.76; PH Housing	Expected average hourly compensation: HCV Occupancy Specialists = \$30.83	Actual average hourly compensation: HCV Occupancy Specialists = \$30.75	Exceeds Benchmark	
	Implementation of the	Expected Cost of Task After Implementation of the Activity:	Actual Cost of Task After Implementation of the Activity:		
	\$ 23,089	\$ 25,791	\$ 17,958		

CE #2: Staff Time Savings - Administrative Efficiency					
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?	
Total time to complete the task in staff hours (decrease).	dedicated to the task prior	Expected amount of total staff time dedicated to the task after implementation of the activity (in hours).	staff time dedicated to the	Whether the outcome meets or exceeds the benchmark.	
	Number of elderly/disabled annual examinations: HCV = 904; PH = 704	Expected number of annual examinations: HCV = 629	Actual number of annual examinations: HCV = 584		
Total time to complete task (Certification Examinations) in staff	examinations: HCV = .92	Expected average time to complete examinations: HCV = 1.33 hours	Actual average time to complete examinations: HCV = 1.00 hours	Exceeds Benchmark	
hours	Total Staff Hours Dedicated to the Task Prior to Implementation of the Activity:	Expected Total Staff Hours Dedicated to the Task After Implementation of the Activity:	Actual Total Staff Hours Dedicated to the Task After Implementation of the Activity:		
	868.3	836.6	584.0		

CE #5: Increase in Tenant Rent Share - Administrative Efficiency						
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).	revenue after implementation of the	Actual tenant rental revenue after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.		
Tenant rental revenue	Monthly tenant rent for HCV = \$132,054; PH = \$148,108	· ·	Actual monthly tenant rent for HCV = \$172,480			
	Average monthly housing units for HCV = 904; PH = 704	Expected average monthly housing units for HCV = 629	Actual average monthly housing units for HCV = 584	Exceeds Benchmark		
	Tenant Rental Revenue Prior to Implementation of the Activity:	Rental Revenue After Implementation of the	Actual Tenant Rental Revenue After Implementation of the Activity:			
	\$ 174	\$ 266	\$ 295			

- iii. **Actual Non-Significant Changes:** HACG did not plan any Non-Significant Changes to this activity in its 2021 Annual MTW Plan.
- iv. **Actual Changes to Metrics and Data Collection:** HACG did not make any non-significant Changes to Metrics/Data Collection to this MTW Activity.

- v. **Actual Significant Changes:** HACG did not make any Significant Changes to this MTW Activity.
- vi. **Challenges in Achieving Benchmarks and Possible Strategies:** Benchmarks were Achieved for this activity during the reporting period.

Activity 2015.02 - Portability Restrictions

- i. **Plan Year Approved, Implemented, and Amended:** was Approved in fiscal year (FY) 2015 (July 1, 2014 June 30, 2015) and Implemented in FY 2016 (July 1, 2015 June 30, 2016). HACG used the approval year, 2015, to identify existing ports for "grandfathering" purposes and notify other Public Housing Agencies/Authorities (PHAs) of its new policy.
- ii. **Description, Impact and Update:** The activity utilizes MTW Authorization D.1.g listed in Attachment C of the MTW Agreement to establish its own Housing Choice Voucher (HCV) portability policies with other MTW PHAs and non-MTW PHAs.

Because port-in and port-out HCVs can significantly impact the budget authority and influence the number of families that HACG can assist, HACG uses this activity to limit the number of HCVs that enter or leave HACG's jurisdiction to verifiable employment reasons. HACG wants to ensure that its budget authority is strong enough to assist as many local families as possible, by reducing payments to higher jurisdictions and/or posing as a collection agency to get payments from other jurisdictions. These activities, paying higher jurisdictions or collecting payments, require a significant commitment of resources with minimal benefit to local families.

Therefore, HCV families seeking to port-into HACG's service jurisdiction need to secure a transfer letter on company letterhead or similar document. HCV families must have at least 6 months of consecutive employment with the company before HACG will approve and/or absorb the incoming port. Similarly, HACG families seeking to port-out of HACG's service jurisdiction need to secure an offer letter or intent to employ statement on company letterhead, a transfer letter/orders from the company, or substantially similar document before HACG will approve the outgoing port. Families that lose their employment within the first six months of porting may also lose their rental assistance benefits through absorption denial, and termination of payment to an outside PHA.

Although this activity limits the movement of vouchers to ensure that HACG's budget authority is strong enough to assist local families, HACG also understands that some moves may be required beyond employment reasons, such as medical and Violence Against Women Act (VAWA) related reasons. HACG is committed to meeting such requirements on a case-by-case basis through written hardship submitted to the Tenant Selection Office (TSO).

This activity remains on schedule and does not meet the definition of rent reform. HACG has not received any remarkable feedback, positive or negative, regarding the limitations placed on HCV portability and since implementation of this activity, the Agency has not received any hardship requests beyond Veterans Affairs Supportive Housing (VASH)

voucher related requests, which are not impacted by this activity. The **HUD Standard Metrics** for this activity are shown below:

CE #1: Agency Cost Savings - Portability Restrictions						
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?		
Total cost of task in dollars (decrease).	implementation of the	Expected cost of task after implementation of the activity (in dollars).	Actual cost of task after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.		
Total cost of task (Port Certification Examinations) in dollars	Number of annual port examinations: In = 63; Out = 91	Expected number of annual port examinations: In = 61; Out = 88	Actual number of annual port examinations: In = 38; Out = 0			
	Average time to complete HCV examinations = 2.25 hours	Expected average time to complete HCV examinations = 1.55 hours	Actual average time to complete HCV examinations = 1.00 hours			
	*	Expected average hourly compensation: HCV Occupancy Specialists = \$28.71	Actual average hourly compensation: HCV Occupancy Specialists = \$30.75	Exceeds Benchmark		
	Cost of Task <i>Prior to</i> Implementation of the Activity:	Expected Cost of Task <i>After</i> Implementation of the Activity:	Actual Cost of Task After Implementation of the Activity:			
	\$ 8,579	\$ 6,631	\$ 1,169			

CE #2: Staff Time Savings - Portability Restrictions					
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?	
Total time to complete the task in staff hours (decrease).	dedicated to the task prior	task after implementation	staff time dedicated to the	Whether the outcome meets or exceeds the benchmark.	
Total time to complete the task (Certification Examinations) in staff hours	Number of annual port examinations: In = 63; Out = 91	Expected number of annual port examinations: In = 61; Out = 88	Actual number of annual port examinations: In = 38; Out = 0		
	Average time to complete port examinations = 2.25 hours	complete port examinations = 1.55	Actual average time to complete port examinations = 1.00 hours	Exceeds Benchmark	
	Total Staff Hours Dedicated to the Task Prior to Implementation of the Activity:	Expected Total Staff Hours Dedicated to the Task After Implementation of the Activity:	Actual Total Staff Hours Dedicated to the Task After Implementation of the Activity:		
	346.5	231.0	38.0		

CE #5: Increase in Tenant Rent Share - Portability Restrictions					
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).	revenue after implementation of the	Actual tenant rental revenue after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.	
Tenant rental revenue	Monthly tenant rent for HCV = \$314,834	rent for HCV = \$22,350	Actual monthly tenant rent for HCV = \$9,124		
	Average monthly housing units for HCV = 2155	Expected average monthly port units: In = 61; Out = 88	,	Exceeds Benchmark	
	Tenant Rental Revenue Prior to Implementation of the Activity:	r	Actual Tenant Rental Revenue After Implementation of the Activity:	Daceers Benefittialik	
	\$ 146	\$ 150	\$ 240		

SS #1: Increase in Household Income - Portability Restrictions					
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 [after] implementation (in dollars).	Whether the outcome meets or exceeds the benchmark.	
Average earned income of Port households affected by this policy.	Total earned income of households affected by this policy = \$9,366,439	affected by this policy = \$1,006,644	Actual total earned income of port households affected by this policy = \$141,341		
	Number of households = 1345		Actual number of port households: In = 38; Out = 0	Benchmark Not Achieved	
	Average Earned Income of Households Affected by this Policy Prior to Implementation of the Activity:	Earned Income of Households Affected by this Policy After Implementation of the	Actual Average Earned Income of Households Affected by this Policy After Implementation of the Activity:		
	\$ 6,964	\$ 6,756	\$ 3,720		

SS #3: Increase in Positive Outcomes in Employment Status - Portability Restrictions				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Port Households Working	Number of work-able (19- 61) households prior to implementation of the activity = 0 Number of work-able (19- 61) households employed	Expected number of Port work-able (19-61) households prior to implementation of the activity = 154 Expected number of Port work-able (19-61)	Actual number of Port work-able (19-61) households after implementation of the activity = 17 Actual number of Port work-able (19-61)	
Fulltime	Fulltime = 0	households employed Fulltime = 72	households employed Fulltime = 5	Benchmark Not Achieved
	Percentage of Work-	Expected Percentage of	U	
	Able Households	Work-Able Households		
	Employed Full-Time	Employed Full-Time	Employed Full-Time	
	Prior to Implementation	After Implementation of	After Implementation of	
	of the Activity:	the Activity:	the Activity:	
	0.0%	46.8%	29.4%	

SS #3: Increase in Positive Outcomes in Employment Status - Portability Restrictions				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Port Households Working Part Time	Number of work-able (19- 61) households prior to implementation of the activity = 0	Expected number of Port work-able (19-61) households prior to implementation of the activity = 154	Actual number of Community-Wide, work- able (19-61) households after implementation of the activity = 17	
	Number of work-able (19- 61) households employed Part Time = 0	Expected number of Port work-able (19-61) households employed Part Time = 31	Actual number of Community-Wide, work- able (19-61) households employed Part Time = 4	Exceeds Benchmark
	Percentage of Work-	Expected Percentage of	Actual Percentage of	
	Able Households	Work-Able Households	Work-Able Households	
	Employed Part-Time	Employed Part-Time	Employed Part-Time	
	Prior to Implementation of the Activity:	After Implementation of the Activity:	After Implementation of the Activity:	
	0.0%	19.5%	23.5%	

SS #3: Increase in Positive Outcomes in Employment Status - Portability Restrictions				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
	Number of work-able (19- 61) households prior to implementation of the activity = 0	Expected number of Port work-able (19-61) households prior to implementation of the activity = 154	Actual number of Port work-able (19-61) households after implementation of the activity = 17	
Port Households Unemployed	Number of work-able (19- 61) households Unemployed = 0	Expected number of Port work-able (19-61) households Unemployed = 7	Actual number of Port work-able (19-61) households Unemployed = 8	Benchmark Not Achieved
	Percentage of Work-	Expected Percentage of	Actual Percentage of	
	Able Households	Work-Able Households		
	Unemployed Prior to Implementation of the	Unemployed After Implementation of the	Unemployed After Implementation of the	
	Activity:	Activity:	Activity:	
	0.0%	4.5%	47.1%	

SS #4: Households Removed from Temporary Assistance for Needy Families (TANF) - Portability Restrictions				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households receiving TANF assistance (decrease).	Households receiving TANF prior to implementation of the activity (number)	Expected number of households receiving TANF after implementation of the activity (number).	Actual households receiving TANF after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
Port Households Receiving TANF	Number of households prior to implementation of the activity = 0	Expected number of Port households after implementation of the activity: In = 61; Out = 88	Actual number of Port households after implementation of the activity: In = 38; Out = 0	
	Percent of households receiving TANF = 0.0%	Expected percent of Port households receiving TANF = 0.0%	Actual percent of households receiving TANF = 0.0%	Meets Benchmark
	Households Receiving TANF <i>Prior to</i> Implementation of the Activity:	Expected Households Receiving TANF After Implementation of the Activity:	Actual Households Receiving TANF After Implementation of the Activity:	
	0.0	0.0	0.0	

SS #8: Households Transitioned to Self Sufficiency - Portability Restrictions				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
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-<br="">sufficiency>>) prior to implementation of the activity (number). This</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).</pha>	Whether the outcome meets or exceeds the benchmark.
Number of Port households transitioned to self sufficiency	Port families housed: In = 63; Out = 91 Households Transitioned to Self- Sufficiency (Portability households reporting earned income) Prior to Implementation of the Activity:	Expected Port families housed: In = 61; Out = 88 Expected Households Transitioned to Self- Sufficiency (Portability households reporting earned income) After Implementation of the Activity: 0	Actual Port families housed: In = 38; Out = 0 Actual Households Transitioned to Self- Sufficiency (Portability households reporting earned income) After Implementation of the Activity:	Exceeds Benchmark

- iii. **Actual Non-Significant Changes:** HACG did not plan any Non-Significant Changes to this activity in its 2021 Annual MTW Plan.
- iv. **Actual Changes to Metrics and Data Collection:** HACG did not make any non-significant Changes to Metrics/Data Collection to this MTW Activity.
- v. **Actual Significant Changes:** HACG did not make any Significant Changes to this MTW Activity.
- vi. Challenges in Achieving Benchmarks and Possible Strategies: Where Benchmarks were Not Achieved, HACG attributes these shortfalls to the COVID-19 pandemic as well as local economy and HACG's "grandfathering" activity. Columbus' unemployment rate is higher than cities of comparable size and governance and higher than the State's unemployment rate. HACG "grandfathered" existing port families, which included zero income families among other family make-ups. Therefore, existing families were not held to the restrictions currently being enforced and somewhat skews the data.

Activity 2015.03 - Simplify Utility Allowance (UA) Calculation

- i. **Plan Year Approved, Implemented, and Amended:** was Approved in fiscal year (FY) 2015 (July 1, 2014 June 30, 2015). HACG re-proposed this activity in its 2016 Amended Annual MTW Plan. The re-proposed activity was Approved and Implemented FY 2016 (July 1, 2015 June 30, 2016).
- ii. **Description, Impact and Update:** HACG uses MTW Authorization D.2.a listed in Attachment C of the MTW Agreement to simplify Utility Allowance (UA) Calculation Charts as appropriate to its evolving, transforming, portfolio of rental units. Portfolio evolvement and transformation is attributed to HACG's full portfolio award to convert its Public Housing (PH) inventory to Section 8 assisted Project-Based Voucher (PBV) housing under the Rental Assistance Demonstration (RAD) Program. Conversion includes PH units at conventional PH sites, as well as mixed-income sites throughout HACG's rental portfolio.

Through this activity, HACG identifies and creates UA Calculation Charts for use under specific rental assistance programs. The table below identifies the simplified UA Calculation Charts and their program applicability:

Utility Allowance Calculation Chart	Program Application
Tenant/Landlord Based	Tenant-Based Vouchers (TBVs)
Public Housing (PH) Based	PH units and RAD PBV Housing
Energy Studies	Mixed-Income Housing

Guidance from the Georgia Department of Community Affairs (DCA) regarding UAs at mixed-income sites using Low-Income Housing Tax Credit (LIHTC) funds played a significant role in HACG amending its 2016 Annual MTW Plan. Through its 2016 Plan Amendment, HACG clarified its original intent in the creation of a Simplified UA Calculation Chart, as well as meet the compliance concerns raised by Georgia DCA.

Prior UA Calculation Charts confused more and involved multiple variables that frustrated involved parties. These variables delayed the rental assistance process from all aspects. However, under these specific UA Calculation Charts, HACG can simplify the process for HACG clients, landlord partners, and staff, while meeting the compliance concerns of Georgia DCA and improve the rental assistance process.

This activity is on schedule. This activity meets the definition of rent reform. HACG has not received any written hardship request. Although specific feedback has not been solicited on this activity, the Simplified UA Calculation Charts appear successful. The following pages reflect **HUD Standard Metrics** for this activity:

CE #1: Agency Cost Savings - Simplify Utility Allowance Calculation Charts				
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.
Total cost of task (Certification Examinations) in dollars	Number of annual examinations: HCV = 2,155; PH = 1,497 Average time to complete examinations: HCV = 2.25 hours; PH = 2.25 hours Average hourly compensation: HCV Occupancy Specialists = \$24.76; PH Housing Managers = \$28.41 Cost of Task <i>Prior to</i> Implementation of the Activity: \$ 107,874		Actual number of annual examinations: HCV = 1,738; PH = 315 Actual average time to complete examinations: HCV = 1.00 hours; PH = 1.50 hours Actual average hourly compensation: HCV Occupancy Specialists = \$30.75; PH Housing Managers = \$34.46 Actual Cost of Task After Implementation of the Activity: \$ 69,726	Exceeds Benchmark

CE #2: Staff Time Savings - Simplify Utility Allowance Calculation Charts				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	dedicated to the task prior	task after implementation	staff time dedicated to the	Whether the outcome meets or exceeds the benchmark.
Total time to complete the task (Certification Examinations) in staff hours	Number of annual examinations: HCV = 2,155; PH = 1,497 Average time to complete examinations: HCV = 2.25 hours; PH = 2.25 hours Total Staff Hours Dedicated to the Task Prior to Implementation of the Activity: 4,108.5	complete examinations: HCV = 1.83 hours; PH = 1.67 hours Expected Total Staff Hours Dedicated to the Task After	Actual number of annual examinations: HCV = 1,738; PH = 315 Actual average time to complete examinations: HCV = 1.00 hours; PH = 1.50 hours Actual Total Staff Hours Dedicated to the Task After Implementation of the Activity: 2,210.5	Exceeds Benchmark

CE #3: Decrease in Error Rate of Task Execution - Simplify Utility Allowance Calculation Charts				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average error rate in completing a task as a percentage (decrease).	the activity (percentage).	1	Actual average error rate of task after implementation of the activity (percentage).	Whether the outcome meets or exceeds the benchmark.
Average error rate in completing a task	Number of quality control checks: HCV = 37; PH = 146	*	Actual number of quality control checks: HCV = 332; PH = 11	
	Number of errors noted: HCV = 7; PH = 22	Expected number of errors noted: HCV = 15; PH = 7	Actual number of errors noted: HCV = 113; PH = 0	Benchmark Not Achieved
	Average Error Rate of	Expected Average Error	Actual Average Error	
	Task Prior to	Rate of Task After	Rate of Task After	
	Implementation of the	Implementation of the	Implementation of the	
	Activity:	Activity:	Activity:	
	16.3%	14.2%	17.0%	

CE #5: Increase in Tenant Rent Share - Simplify Utility Allowance Calculation Charts				
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.
	Monthly tenant rent for HCV = \$314,834; PH = \$181,638	rent for HCV = \$461,250;	Actual monthly tenant rent for HCV = \$703612; PH = \$65,949	
	units for HCV = 2,155; PH = 1,497	2,348; PH = 1,475	housing units for HCV = 3,235; PH = 403	Benchmark Not Achieved
	Tenant Rental Revenue <i>Prior to</i> Implementation of the Activity:	Expected Tenant Rental Revenue After Implementation of the Activity:	Actual Tenant Rental Revenue After Implementation of the Activity:	
	\$ 136	\$ 153	\$ 191	

- iii. **Actual Non-Significant Changes:** HACG did not plan any Non-Significant Changes to this activity in its 2021 Annual MTW Plan.
- iv. **Actual Changes to Metrics and Data Collection:** HACG did not make any non-significant Changes to Metrics/Data Collection to this MTW Activity.
- v. **Actual Significant Changes:** HACG did not make any Significant Changes to this MTW Activity.

vi. Challenges in Achieving Benchmarks and Possible Strategies: Where Benchmarks were Not Achieved, HACG attributes these shortfalls to COVID-19 pandemic and local economy. Also, HACG's focus on converting its PH units to Section 8 PBV units under RAD. Columbus' economy had begun experiencing some growth until the last four months of the fiscal year, when COVID-19 posed a serious public health risk and businesses were affected. Additionally, Columbus' unemployment rate (5.7%) continues to outpace GA cities of similar size, such as the City of Augusta-Richmond County (4.9%), a city of comparable size and government make-up, the City of Atlanta (5.5%), the State's Capitol, and the State of Georgia (4.4%).

Activity 2015.04 – Cap Childcare Deductions

- i. **Plan Year Approved, Implemented, and Amended:** was Approved and Implemented in fiscal year (FY) 2015 (July 1, 2014 June 30, 2015). Based on HUD's actual approval of this activity and HACG's implementation strategy, at annual, this activity's implementation process overlapped into FY 2016 (July 1, 2015 June 30, 2016).
- ii. **Description, Impact and Update:** HACG utilizes MTW Authorizations C.11 and D.2.a listed in Attachment C of the MTW Agreement to limit the amount of childcare costs that HACG will include in the rent calculation. This activity, through MTW Authorizations, establishes definitions of income, adjusted income, and deductions under applicable rental assistance programs.

Under current regulations, eligible deductions can reduce a family's Total Tenant Payment (TTP), or their rent share, by lowering their household income. Childcare cost is such a deduction. Historical data supports that enough Public Housing (PH) and Housing Choice Voucher (HCV) families have claimed high childcare costs, which almost matched their reported income, to significantly reduce their rent share.

HACG introduced this activity to set limits regarding this deductible expense being claimed by families during their recertification examination. The activity incorporates the Division of Family and Children Services (DFCS) Children and Parents Services (CAPS) Program reimbursement guidelines and schedule to create a ceiling based on service provider, number of children, and facility used by service provider. Families can continue to use eligible service providers as they desire, but HACG will not factor payments above the CAPS Program reimbursement rate when calculating their household income.

HACG has not received any written hardship requests regarding this activity. Meanwhile, the **HUD Standard Metrics** for this activity are listed on the next page.

CE #1: Agency Cost Savings - Cap Childcare Deductions				
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.
	Number of annual examinations: HCV = 1,239; PH = 803	Expected number of annual examinations: HCV = 1,756; PH = 226	Actual number of annual examinations: HCV = 134; PH = 21	
	Average time to complete examinations: HCV = 2.25 hours; PH = 2.25 hours	Expected average time to complete examinations: HCV = 1.83 hours; PH = 1.67 hours	Actual average time to complete examinations: HCV = 1.00 hours; PH = 1.50 hours	
Total cost of task (Certification Examinations) in dollars	Average hourly compensation: HCV Occupancy Specialists = \$24.76; PH Housing Managers = \$28.41	Expected average hourly compensation: HCV Occupancy Specialists = \$30.83; PH Housing Managers = \$31.98	Actual average hourly compensation: HCV Occupancy Specialists = \$30.75; PH Housing Managers = \$34.46	Exceeds Benchmark
	Cost of Task <i>Prior to</i> Implementation of the Activity:	Expected Cost of Task After Implementation of the Activity:	Actual Cost of Task After Implementation of the Activity:	
	\$ 107,874	\$ 111,142	\$ 5,206	

CE #2: Staff Time Savings - Cap Childcare Deductions				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	dedicated to the task prior to implementation of the	task after implementation	staff time dedicated to the	Whether the outcome meets or exceeds the benchmark.
Total time to complete the task (Certification Examinations) in staff hours	Number of annual examinations: HCV = 1,239; PH = 803 Average time to complete examinations: HCV = 2.25 hours; PH = 2.25 hours Total Staff Hours	Expected average time to complete examinations: HCV = 1.83 hours; PH = 1.67 hours Expected Total Staff	Actual number of annual examinations: HCV = 134; PH = 21 Actual average time to complete examinations: HCV = 1.00 hours; PH = 1.50 hours Actual Total Staff Hours	Exceeds Benchmark
nous	Dedicated to the Task Prior to Implementation of the Activity: 4,108.5	Hours Dedicated to the Task After Implementation of the Activity: 3,590.9	Dedicated to the Task After Implementation of the Activity: 165.5	

CE #3: Decrease in Error Rate of Task Execution - Cap Childcare Deductions							
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?			
Average error rate in completing a task as a percentage (decrease).	Average error rate of task prior to implementation of the activity (percentage).	Expected average error rate of task after implementation of the activity (percentage).	Actual average error rate of task after implementation of the activity (percentage).	Whether the outcome meets or exceeds the benchmark.			
Average error rate in completing a task	Number of quality control checks: HCV = 37; PH = 146	1	Actual number of quality control checks: HCV = 332; PH =11				
	Number of errors noted: HCV = 7; PH = 22	Expected number of errors noted: HCV = 15; PH = 7	Actual number of errors noted: HCV = 113; PH = 0	Benchmark Not Achieved			
	Average Error Rate of	Expected Average Error	· ·				
	Task Prior to	Rate of Task After	Rate of Task After				
	Implementation of the Activity:	Implementation of the Activity:	Implementation of the Activity:				
	16.3%	15.2%	17.0%				

CE #5: Increase in Tenant Rent Share - Cap Childcare Deductions							
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).	revenue after implementation of the	Actual tenant rental revenue after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.			
Tenant rental revenue	Monthly tenant rent for HCV = \$314,834; PH = \$181,638 Average monthly housing	rent for HCV = \$461,250;	Actual monthly tenant rent for HCV = \$703,612; PH = \$65,949				
	, ,	housing units for HCV =	housing units for HCV = 3,235; PH = 403	Exceeds Benchmark			
	Tenant Rental Revenue Prior to Implementation of the Activity:	Expected Tenant Rental Revenue After Implementation of the Activity:	Actual Tenant Rental Revenue After Implementation of the Activity:				
	\$ 136	\$ 153	\$ 191				

- iii. **Actual Non-Significant Changes:** HACG did not plan any Non-Significant Changes to this activity in its 2021 Annual MTW Plan.
- iv. **Actual Changes to Metrics and Data Collection:** HACG did not make any non-significant Changes to Metrics/Data Collection to this MTW Activity.
- v. **Actual Significant Changes:** HACG did not make any Significant Changes to this MTW Activity.

vi. **Challenges in Achieving Benchmarks and Possible Strategies:** Benchmarks were Achieved for this activity during the reporting period except for CE#3: Decrease in Error Rate of Task Execution. HACG believes some of the errors was due to low staffing during COVID-19 pandemic.

Activity 2016.02 - Non-Competitive Project-Basing Process

- i. **Plan Year Approved, Implemented, and Amended:** This was Approved and Implemented in fiscal year 2016 (based on construction completion).
- ii. **Description, Impact and Update:** The activity utilizes MTW Authorizations D.7.a listed in Attachment C of the MTW Agreement to eliminate the competitive bid process when HACG needs to project-base assistance within its service jurisdiction.

Under this activity, HACG can project-base Section 8 assistance at properties owned directly or indirectly by HACG, which will improve cost-efficiency to the agency and increase housing choices for low-income families. HACG actively applies this activity at recently modernized, converted sites and plans to apply this activity at newly constructed and/or modernized sites in the future.

This activity is on schedule and does not meet the definition of rent reform. Additionally, HACG has not received any pushback related to this activity beyond internal discussion on the application of this activity at existing and planned projects. The **HUD Standard Metrics** for this activity are below:

CE #1: Agency Cost Savings - Non-Competitive Project-Basing Process				
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).	1	Actual cost of task after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
	Number of annual examinations: PBV = 279	Expected number of annual examinations: PBV = 1,700	Actual number of annual examinations: PBV = 436	
Total cost of task (Certification Examinations) in dollars	Average time to complete examinations: PBV = 2.25 hours	1 0	Actual average time to complete examinations: PBV = 1.00 hours	
	Average hourly compensation: HCV Occupancy Specialists = \$24.76	compensation: HCV	Actual average hourly compensation: HCV Occupancy Specialists = \$30.75	Exceeds Benchmark
	Cost of Task <i>Prior to</i> Implementation of the Activity: \$ 15,543	After Implementation of	Actual Cost of Task After Implementation of the Activity: \$ 13,407	

CE #2: Staff Time Savings - Non-Competitive Project-Basing Process				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	dedicated to the task prior	Expected amount of total staff time dedicated to the task after implementation of the activity (in hours).	staff time dedicated to the	Whether the outcome meets or exceeds the benchmark.
Total time to complete the task (Certification Examinations) in staff hours	Number of annual examinations: PBV = 279	Expected number of annual examinations: PBV = 1,700	Actual number of annual examinations: PBV = 436	Exceeds Benchmark
	Average time to complete examinations: PBV = 2.25 hours Total Staff Hours Dedicated to the Task Prior to Implementation of the Activity:	complete examinations: PBV = 1.83 hours Expected Total Staff Hours Dedicated to the Task After	Actual average time to complete examinations: PBV = 1.00 hours Actual Total Staff Hours Dedicated to the Task After Implementation of the Activity:	
	627.8	Activity: 3,111.0	436.0	

- iii. **Actual Non-Significant Changes:** HACG did not plan any Non-Significant Changes to this activity in its 2021 Annual MTW Plan.
- iv. Actual Changes to Metrics and Data Collection: HACG did not make any non-significant Changes to Metrics/Data Collection to this MTW Activity.
- v. **Actual Significant Changes:** HACG did not make any Significant Changes to this MTW Activity.
- vi. Challenges in Achieving Benchmarks and Possible Strategies: Benchmarks were Achieved for this activity in the reporting period.

Activity 2016.03 – Project-Basing Flexibilities

- i. **Plan Year Approved, Implemented, and Amended:** This was introduced and approved in HACG's FY2016 Annual MTW Plan, implemented in FY 2018, amended in FY 2019.
- ii. **Description, Impact and Update:** HACG has implemented this activity with the current conversion from PH units to Section 8 PBV units under the RAD Program and LIHTC. HACG will continue to implement with the completion of its portfolio conversion.

Under this activity, HACG will project-base more units at converted sites and future sites, consistent with HACG's business model, than the 25% building cap (50% under RAD) currently allows. Additionally, the activity waives the mandatory, supportive services

participation requirement for families living in the "excepted units" (those units above the building cap).

The latest timeline projects that all PH units in HACG's portfolio will convert to Section 8 PBV units by December 31, 2022; however, various elements in the conversion process make this timeline more fluid. Therefore, the complete conversion may happen sooner or may even happen later than the current projection date. Nonetheless, HACG will continue to implement the flexibilities of this activity as conversions and/or new developments arise.

CE #1: Agency Cost Savings - Streamline Housing Quality Standards (HQS) Inspections					
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.	
Total cost of task (HCV/S8 HQS Inspections) in dollars	Number of HQS Inspections = 5032 Average time per HQS Inspection = 1.24 Average hourly compensation (salary + benefits) of HCV/S8 HQS Inspectors = \$23.70 Cost of Task <i>Prior to</i> Implementation of the Activity: \$ 147,885	Expected Cost of Task	Inspections = 2252	Exceeds Benchmark	

CE #2: Staff Time Savings - Streamline Housing Quality Standards (HQS) Inspections				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	dedicated to the task prior	task after implementation	staff time dedicated to the	Whether the outcome meets or exceeds the benchmark.
Total time to complete	Number of HQS Inspections = 5032 Average time per HQS Inspection = 1.24	Expected number of HQS Inspections = 4521 Expected average time per HQS Inspection = 1.38	Inspections = 2252	
task (HCV/S8 HQS inspections) in staff hours	Total Staff Hours Dedicated to the Task Prior to Implementation of the Activity:	Expected Total Staff Hours Dedicated to the Task After Implementation of the	Actual Total Staff Hours Dedicated to the Task After Implementation of the Activity:	Exceeds Benchmark
	6239.7	6239.0	2815.0	

HC #4: Displacement Prevention - Site-Based Housing Flexibility					
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?	
move (decrease). If units	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.	
this box.	2260	1157	913	Exceeds Benchmark	

- iii. **Actual Non-Significant Changes:** HACG did not plan any Non-Significant Changes to this activity in its 2021 Annual MTW Plan.
- iv. **Actual Changes to Metrics and Data Collection:** HACG did not make any non-significant Changes to Metrics/Data Collection to this MTW Activity.
- v. **Actual Significant Changes:** HACG did not make any Significant Changes to this MTW Activity.
- vi. **Challenges in Achieving Benchmarks and Possible Strategies:** Benchmarks were Achieved for this activity in the reporting period.

Activity 2018.01 – Eliminate/Reduce Interim Certification Examinations

- i. **Plan Year Approved, Implemented, and Amended:** This was introduced and approved in HACG's FY 2018 Annual MTW Plan, implemented began in FY 2019 with full implementation in FY 2020.
- ii. **Description, Impact and Update:** This activity allows HACG to modify its Housing Choice Vouchers (HCV) and Public Housing Programs guidelines to increase staff productivity, assist programs participants in the preparation for market-rate units and to eliminate a growing concern of program participants reporting a loss of income shortly after completing intake and/or annual certification examination.

 To accomplish this activity, HACG implanted the following:
 - Eliminated interim certification examinations on contribution income
 - Limited program participants to only one (1) interim certification examination annually for all other income related adjustments
 - Program participants that reported contribution income cannot report a loss of contribution income for 12 months

HACG also updated the Hardship Case Criteria in FY 2020 to include language regarding any health/economic hardships associated with COVID-19. In FY 2021 reporting period, there were thirty-two (32) hardship cases approved due to employment during the COVID-19 pandemic.

CE #1: Agency Cost Savings - Eliminate/Reduce Interim Certification Examinations					
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?	
Total cost of task in dollars (decrease).	implementation of the	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.	
	Number of interim examinations: HCV = 1,027; PH = 87	Expected number of interim examinations: HCV = 611; PH = 64	Actual number of interim examinations: HCV = 346; PH = 38		
	Average time to complete examinations: HCV = 2.25 hours; PH = 2.25 hours	Expected average time to complete examinations: HCV = 1.83 hours; PH = 1.67 hours	Actual average time to complete examinations: HCV = 1.00 hours; PH = 1.50 hours		
Total cost of task (Certification Examinations) in dollars	Average hourly compensation: HCV Occupancy Specialists = \$24.76; PH Housing Managers = \$28.41	Expected average hourly compensation: HCV Occupancy Specialists = \$30.83; PH Housing Managers = \$31.98	Actual average hourly compensation: HCV Occupancy Specialists = \$30.75; PH Housing Managers = \$34.46	Exceeds Benchmark	
	Cost of Task <i>Prior to</i> Implementation of the Activity:	Expected Cost of Task After Implementation of the Activity:	Actual Cost of Task After Implementation of the Activity:		
	\$ 62,775	\$ 37,890	\$ 12,604		

CE #2: Staff Time Savings - Eliminate/Reduce Interim Certification Examinations					
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?	
Total time to complete the task in staff hours (decrease).	dedicated to the task prior to implementation of the	task after implementation	staff time dedicated to the	Whether the outcome meets or exceeds the benchmark.	
	Number of annual examinations: HCV = 1,027; PH = 87	Expected number of annual examinations: HCV = 611; PH = 64	Actual number of annual examinations: HCV = 346; PH = 38		
Total time to complete the task (Certification Examinations) in staff hours	Average time to complete examinations: HCV = 2.25 hours; PH = 2.25 hours	Expected average time to complete examinations: HCV = 1.83 hours; PH = 1.67 hours	Actual average time to complete examinations: HCV = 1.00 hours; PH = 1.50 hours	Exceeds Benchmark	
	Total Staff Hours Dedicated to the Task Prior to Implementation of the Activity:	Expected Total Staff Hours Dedicated to the Task After Implementation of the Activity:	Actual Total Staff Hours Dedicated to the Task After Implementation of the Activity:		
	2,506.5	1,225.0	403.0		

CE #5: Increase in Tenant Rent Share - Eliminate/Reduce Interim Certification Examinations				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Tenant rental revenue in dollars (increase).	prior to implementation of the activity (in dollars).	Expected tenant rental revenue after implementation of the activity (in dollars).	revenue after implementation of the	Whether the outcome meets or exceeds the benchmark.
Tenant rental revenue	Monthly tenant rent for HCV = \$314,834; PH = \$181,638 Average monthly housing units for HCV = 2,155; PH = 1,497	rent for HCV = \$461,250; PH = \$123,500 Expected average monthly	PH = \$65,949	Exceeds Benchmark
	Tenant Rental Revenue <i>Prior to</i> Implementation of the Activity:	Expected Tenant Rental Revenue After Implementation of the Activity: \$ 153	Actual Tenant Rental Revenue After Implementation of the Activity:	

- iii. **Actual Non-Significant Changes:** HACG did make Non-Significant Changes to this activity in its 2021 Annual MTW Plan.
- iv. **Actual Changes to Metrics and Data Collection:** HACG did not make any non-significant Changes to Metrics/Data Collection to this MTW Activity.
- v. **Actual Significant Changes:** HACG did not make any Significant Changes to this MTW Activity.
- vi. **Challenges in Achieving Benchmarks and Possible Strategies:** Benchmarks were Achieved for this activity in the reporting period.

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

- i. **Plan Year Approved, Implemented, and Amended:** This was introduced and Approved in fiscal year (FY) 2018, but not fully implemented. The activity was re-proposed in the 2019 Annual MTW Plan and implemented in FY 2019. HACG amended the 2020 Annual MTW Plan through a Technical Amendment in FY 2020.
- ii. **Description, Impact and Update:** The activity was expanded upon because of HACG's experience with its first portfolio conversion from PH units to Section 8 PBV units under the RAD Program. Since that experience, HACG re-proposed this activity in its 2019 Annual MTW Plan and it was approved. In 2020, the activity was revised again to include Tenant Protection Vouchers and it was approved on February 4, 2020.

This activity allows HACG to over-house eligible, qualified low-income families at all non-Public Housing site-based housing developments. In fiscal year 2020, HACG expanded to also included Tenant Protection Vouchers (TPV) awarded to HACG for Ralston Towers residents and provide gap payment assistance for over-housed families to the landlord for the difference between 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 appropriately sized family becomes available to occupy that assisted unit.

Under this activity, HACG significantly improves the use of federal dollars and reducing vacancies. HACG offers unoccupied, large unit to smaller eligible, qualified families with limited housing options and limited resources.

For all non-Public Housing site based housing developments once an appropriately sized family and right-size unit becomes available that meets the accommodation needs of the incumbent family, HACG will issue a 30-day notice in accordance with the "transfer form" for the incumbent family to move/transfer to the appropriate unit. The Ralston Towers TPV holders are permitted to remain in their current unit for the duration of their voucher or until they move out of their unit to a new unit.

This activity is on schedule and does not meet the definition of rent reform. Additionally, HACG has not received any pushback related to this activity. The **HUD Standard Metrics** for this activity are on the next page:

HC #4: Displacement Prevention - Site-Based Housing Flexibility				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
lose assistance or need to move (decrease). If units	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	1157	913	Benchmark Not Achieved

HC #5: Increase in Resident Mobility - Site-Based Housing Flexibility					
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?	
Number of households	to a better unit and/or neighborhood of opportunity prior to implementation of the activity (number). This	to move to a better unit and/or neighborhood of	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	332	260	Benchmark Not Achieved	

- iii. **Actual Non-Significant Changes:** HACG did make Non-Significant Changes to this activity in its 2021 Annual MTW Plan.
- iv. **Actual Changes to Metrics and Data Collection:** HACG did not make any non-significant Changes to Metrics/Data Collection to this MTW Activity.
- v. **Actual Significant Changes:** HACG did not make any Significant Changes to this MTW Activity.
- vi. Challenges in Achieving Benchmarks and Possible Strategies: Where Benchmarks were Not Achieved is not applicable to this activity.

Activity 2019.01 – Minimum Rent Increase/Utility Reimbursement Payments (URPs) Decrease

- i. **Plan Year Approved, Implemented, and Amended:** This was introduced and Approved in HACG's 2019 Annual MTW Plan, but not fully implemented until FY 2020.
- ii. **Description, Impact and Update:** HACG utilizes MTW Authorizations C.11 and D.2.a listed in Attachment C of the MTW Agreement to increase the minimum rent and eliminate or reduce the utility reimbursement payments (URPs).

HACG seeks to improve its cost efficiency and promote self-sufficiency through the implementation of this activity. Elimination of this task achieves Cost Effectiveness of federal dollars.

Under this activity, HACG increased the minimum rent to \$150 to eliminate URPs (or at the least significantly reduce the number of URPs processed) over two years for all programs with the exception of VASH vouchers. The increase in minimum rent across all rental assistance programs significantly reduces negative rent situation that require an URP check. The first increase in minimum rent from \$50 to \$100, was effective January 1, 2019, and the second increase from \$100 to \$150 was effective July 1, 2019.

As of June 30, 2021, there were 1,415 URPs with a total value of \$140,602.00. This activity is on schedule and meets the definition of rent reform. HACG has received thirty-two (32) written hardship requests due to loss of income throughout the year. The **HUD Standard Metrics** for this activity are below:

CE #1: Agency Cost Savings - Minimum Rent Increase/Utility Reimbursement Payment Decrease					
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?	
Total cost of task in	implementation of the	1	limplementation of the	Whether the outcome meets or exceeds the benchmark.	
	\$ 518,287	\$ 103,657	\$ 139,256	Benchmark Not Achieved	

CE #2: Staff Time Savings - Minimum Rent Increase/Utility Reimbursement Payment Decrease					
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?	
Total time to complete the task in staff hours (decrease).	dedicated to the task prior to implementation of the	Expected amount of total staff time dedicated to the task after implementation of the activity (in hours).	staff time dedicated to the task after implementation	Whether the outcome meets or exceeds the benchmark.	
	9779	4890	1415	Exceeds Benchmark	

CE #5: Increase in Tenant Rent Share - Min. Rent Increase/Utility Reimbursement Payment Decrease Unit of Measurement Baseline Benchmark Outcome Benchmark Achieved? Expected tenant rental Actual tenant rental Tenant rental revenue revenue after revenue after Whether the outcome meets prior to implementation of Tenant rental revenue in implementation of the implementation of the or exceeds the benchmark. the activity (in dollars). dollars (increase). activity (in dollars). activity (in dollars). \$ 94 \$ 191 Exceeds Benchmark 85 \$

SS #1: Increase in Household Income - Min. Rent Increase/Utility Reimbursement Payment Decrease				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average earned income of households affected by this policy in dollars	households affected by this policy prior to implementation of the	, , , ,	Actual average earned income of households affected by this policy prior to implementation (in dollars).	Whether the outcome meets or exceeds the benchmark.
(increase).	\$ 6,224	\$ 6,392	\$ 6,218	Benchmark Not Achieved

SS #3: Increase in Positive Outcomes in Employment Status - Min. Rent Increase/URP Decrease				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Employed Full- Time	able households in Min Rent Increase/URP Decrease prior to implementation of activity (percent). This	Rent Increase/URP Decrease after implementation of the	work-able households in Min Rent Increase/URP Decrease	Whether the outcome meets or
	34%	35%	40%	Exceeds Benchmark

SS #3: Increase in Positive Outcomes in Employment Status - Min. Rent Increase/URP Decrease				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Employed Part- Time	able households in Min Rent Increase/URP Decrease prior to implementation of	Rent Increase/URP Decrease after implementation of the	work-able households in Min	Whether the outcome meets or
	26%	27%	16%	Benchmark Not Achieved

SS #3: Increase in Positive Outcomes in Employment Status - Min. Rent Increase/URP Decrease				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Unemployed	Percentage of total workable households in Min Rent Increase/URP Decrease prior to implementation of activity (percent). This number may be zero.	Rent Increase/URP Decrease after implementation of the	work-able households in Min	Whether the outcome meets or
	40%	38%	44%	Benchmark Not Achieved

SS #6: Reducing Per Unit Subsidy Costs for Participating Households - Rent Increase/URP Decrease				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Section 8 and/or 9 subsidy per household	household affected by this policy prior to implementation of the	per household affected by this policy after implementation of the	Actual average subsidy per household affected by this policy after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
dollars (decrease).	\$ 583	\$ 304	\$ 453	Benchmark Not Achieved

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	implementation of the	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.
	\$ 721,401	\$ 2,139,232	\$ 2,134,214	Benchmark Not Achieved

SS #8: Households Transitioned to Self Sufficiency - Min. Rent Increase/URP Decrease				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
PHA uses this metric, the "Outcome" number should also be provided in Section (II) Operating	to self sufficiency (< <pha definition="" of="" self-<br="">sufficiency>>) prior to implementation of the activity (number). This number may be zero.</pha>	transitioned to self sufficiency (< <pha definition of self- sufficiency>>) after implementation of the</pha 	Actual households transitioned to self sufficiency (< <pha definition of self- sufficiency>>) after implementation of the activity (number).</pha 	Whether the outcome meets or exceeds the benchmark.
Information in the space provided.	57	59	66	Exceeds Benchmark

iii. **Actual Non-Significant Changes:** HACG did not make Non-Significant Changes to this activity in its 2021 Annual MTW Plan.

- iv. **Actual Changes to Metrics and Data Collection:** HACG did not make any non-significant Changes to Metrics/Data Collection to this MTW Activity.
- v. **Actual Significant Changes:** HACG did not make any Significant Changes to this MTW Activity.
- vi. **Challenges in Achieving Benchmarks and Possible Strategies:** Where Benchmarks were Not Achieved is due to economy where more residents were unemployed.

B. NOT YET IMPLEMENTED ACTIVITIES

Activity 2016.01 – Next Step Vouchers

- i. **Plan Year Approved, Implemented, and Amended:** This was Approved and Implemented in fiscal year (FY) 2016 (July 1, 2015 to June 30, 2016).
- ii. **Description, Impact and Update:** The implementation of this activity relies upon properly referred aged-out foster youth from the Division of Family and Children Services (DFCS), who also provide the case management component in accordance with the Memorandum of Understanding / Agreement (MOU/A) between the agencies.

Although DFCS will exhaust all existing state programs/resources before referring aged-out foster youth to HACG, the activity requires that foster youth actively participate in an education or employment activity for at least 20-hours per week and actively participate in case management activities administered by DFCS Case Workers. HACG feels that these highlighted elements of the activity in addition to exhausting state resources first, provides foster youth with the greatest chance of self-sufficiency success.

During fiscal year 2018, DFCS referred three foster youth. Unfortunately, the referrals' program participation was terminated because of program infractions, such as transfer to another jurisdiction by DFCS, incarceration, and similar actions requiring program termination. As a result, HACG did collect enough data to report on the effectiveness or outcomes of the activity during this reporting period.

As of June 30, 2021, HACG has no one on the program. HACG is currently working with Home for Good and DFCS and is hopeful to begin receiving new referrals for FY 2022.

HACG will continue to administer the activity. At the end of FYE 2022, HACG will review the activity's progress and decide if an activity modification or activity close-out is appropriate.

Activity 2020.01 – Sponsor-Based Emergency Voucher Program (EVP)

i. **Plan Year Approved, Implemented, and Amended:** was introduced and approved in HACG's FY2020 Annual MTW Plan, implemented in FY 2020.

ii. **Description, Impact and Update:** HACG entered into an agreement with Home for Good (HfG) on January 27, 2020, to assist as the Sponsor of this activity. The full implementation of this activity is unpredictable due to the nature of the activity and relies on properly referral from HfG. HACG has set-aside 24 Tenant Based Vouchers (TBV's) for Emergency Housing for families affected by local natural disasters, fire, flooding, or notice to condemn property promoted by local government action in Muscogee County. The TBV's will be limited to a 6-month period in order to allow the individual or families to process insurance claims, contract family members and stabilize their finances.

Natural disasters and fires are unpredictable. When these circumstances occur, HACG and HfG has a process in place to be able to provide immediate assistance for the families affected. The real impact of this activity will be confirmed by the families assisted in the future. There was no emergency situation which warranted the use of this activity in FY 2021.

C. ACTIVITIES ON HOLD

HACG does not have any activities on hold.

D. CLOSED OUT ACTIVITES

Activity 2014.01 – Community Choice

- i. **Plan Year Approved, Implemented, and Amended:** Activity was proposed in Fiscal Year End (FYE) 2014, re-proposed in FYE 2015, and Approved and Implemented in fiscal year 2015. HACG stopped administering this activity in FY 2018 and officially closed-out this activity in FY 2019.
- ii. Why Activity was Closed Out: HACG closed the activity because the evaluation period is complete. HACG had contracted with Columbus State University (CSU) to evaluate this activity. CSU's final evaluation report of its findings was included in the 2019 MTW Annual Report.
- iii. **Description, Impact and Update:** HACG learned that offering a higher-valued voucher did not have a big impact of where a resident chose to live. The majority of the residents were satisfied with their overall home and neighborhood and chose to remain in the same area. In comparing the three groups, the Community-Wide evaluation families remained unchanged, and the Comparison/Control evaluation families dropped 50% during the same timeframe. Approximately 85% of the families restricted to low-poverty areas continued to live in those areas at the end of the reporting period.

The data supported the theory that people choose familiarity and convenience, including low-income families, when choosing where to live. Whether familiarity includes good areas or bad areas, the knowledge of surroundings, shopping, banking, bus routes, or other community elements, familiarity and convenience seem to play a bigger role in housing selection than cost.

Activity 2014.05 - Streamline Housing Quality Standards (HQS)

- i. **Plan Year Approved, Implemented, and Closed:** This activity was Approved and Implemented in fiscal year 2014. HACG stopped administering this activity in fiscal year 2017 and officially Closed-Out this activity in fiscal year 2018.
- ii. Why Activity was Closed Out: PIH Notice 2016-05 provides several streamlining elements that MTW PHAs and non-MTW PHAs can incorporate into their policies and procedures. HACG adopted Attachment K and L of PIH Notice 2016-05. These attachments allow PHAs, MTW and non-MTW, to conduct biennial HQS inspections, permit self-certification, and accept third-party inspection results. These allowances under PIH Notice 2016-05 make HACG's use of MTW Authorizations to do the same thing obsolete.
- iii. **Description, Impact and Update of Close Out:** Collectively, HACG learned that biennial inspections helped HACG inspectors to focus on properties and single-family units that habitually failed HQS inspections. It also, based on survey comments, was well received by landlord partners and voucher families.
 - HACG advocates mobility, but advocates stabilization more. Statutory exceptions that might have provided additional benefit may have included the ability to have families honor their lease agreement. Under some circumstances, minor infractions allow a family to relocate, on a whim, which makes it difficult to continue to develop strong partnerships with smaller portfolio landlords. On the other hand, larger portfolio landlords do not feel the impact of 3rd, 4th, and 5th visit inspection fees. In fact, HACG believes that some landlords wait for the "free" inspection, fix what they must and gladly pay the re-inspection fee.

Activity 2014.06 - Rent Reform (Farley)

- i. **Plan Year Approved, Implemented, and Closed:** This activity was Approved and Implemented in fiscal year 2014. HACG stopped administering this activity in fiscal year 2017 and officially Closed-Out this activity in fiscal year 2018.
- ii. Why Activity was Closed Out: HACG was awarded a full portfolio conversion from PH units to Section 8 PBV units under the RAD Program. HACG converted the treatment site, E.E. Farley, from PH units to Section 8 PBV units. HACG used Low-Income Housing Tax Credits (LIHTC) funding to meet GA Department of Community Affairs (DCA) and RAD

requirements. The conversion, use of LIHTC funds, and other variables skewed comparison metrics to the point that demographically similar sites were no longer the similar.

Differences included interior and exterior improvements, including floor plan additions, market rent units, increased administrative fees, and income calculations at the treatment site and the comparison/control site remained unchanged. These changes continued to make the comparison challenging and inequitable, which made evaluation findings concerning at best.

iii. **Description, Impact and Update:** HACG learned that the differences between the two properties required detailed monitoring, especially at the treatment site, where multiple variables were introduced. HACG did not do an outstanding job of marketing the Tiered Rent Schedule to families and once the treatment site converted subsidy programs under RAD and used LIHTC funding, the Tiered Rent Schedule became obsolete. Additionally, HACG never celebrated any success because of an intense, focused Family Self-Sufficiency (FSS) campaign at the treatment site. As of June 30, 2018, HACG had 22 families enrolled in the FSS 9% at the treatment site and 32% at the comparison/control site. Participation data suggests that the activity had an opposite effect of intended results.

Statutory benefits that might have provided an additional benefit include an ability to mandate participation in the FSS Program to learn if that would have provided an influence or spark for the treatment site families. Also, an escrow match or some other consideration for successful families in either group. Initial ideas include down-payment assistance, college application assistance for middle-school to high-school aged HACG minors, scholarship assistance, and other "big ticket" incentives that may help families to break its poverty cycle.

Activity 2015.01 – Eliminate Child Support from Income Calculation

- i. Plan Year Approved, Implemented, and Amended: This activity was Approved and Implemented in fiscal year 2015. HACG stopped administration of this activity and Closed-Out the activity in fiscal year 2017.
- ii. Why Activity was Closed Out: HACG was awarded a full portfolio conversion from PH units to Section 8 PBV units under the RAD Program. HACG used LIHTC funding to meet DCA and RAD requirements. The conversion and use of LIHTC funds change household income calculations, which makes the exclusion of income a non-compliant action. Therefore, this activity is obsolete and no longer supported by MTW Authorizations.
- iii. **Description, Impact and Update:** This activity's sample size is too small to derive final outcomes. However, a lesson learned in activity planning includes the factoring in the whole picture (when able) to avoid early close-outs, amendments, and similar actions that prevent the growth possibilities of the activity, affected families, and/or impacted staff.
 - Statutory exceptions that might have provided additional benefit includes the ability to eliminate or modify income calculations regardless of the funding source(s). Some income

sources, especially fluctuating income, can create more challenges in calculations than being able to eliminate or adjust the fluctuating income source(s).

(V) SOURCES AND USES OF MTW FUNDS

ANNUAL MTW REPORT

A. ACTUAL SOURCES AND USES OF MTW FUNDS

i. Actual Sources of MTW Funds in the Plan Year

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

ii. Actual Uses of MTW Funds in the Plan Year

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

iii. Describe Actual Use of MTW Single Fund Flexibility

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

ACTUAL USE OF MTW SINGLE FUND FLEXIBILITY

None of HACG's HUD-approved, implemented activities used only MTW Single-Fund flexibility in fiscal year 2021. However, HACG is using MTW Single-Fund flexibility for Chase Development subordinate/permanent loan financing. This will be the first for permanent loan financing activities. Also, will utilize funding for a Joint Venture with Macon Housing Authority permanent loan financing.

B. LOCAL ASSET MANGEMENT PLAN

i.	Did the MTW PHA allocate costs within statute in the Plan Year?
ii.	Did the MTW PHA implement a local asset management plan (LAMP) in the Plan Year?
iii.	Did the MTW PHA provide a LAMP in the appendix?
iv.	If the MTW PHA has provided a LAMP in the appendix, please provide a brief update on implementation of the LAMP. Please provide any actual changes (which must be detailed in an approved Annual MTW Plan/Plan amendment) or state that the MTW PHA did not make any changes in the Plan Year.
	N/A

Section VI – Administrative

A. <u>HUD Reviews</u>, <u>Audits</u>, <u>or Physical Inspection Issues</u> – HACG did not have any HUD reviews nor physical inspection issues that required action by HACG to address for FY 2021. There were no HUD findings during FY 2020 audit, and the FY 2021 audit is currently being conducted.

B. Meeting Statutory Requirement Certification

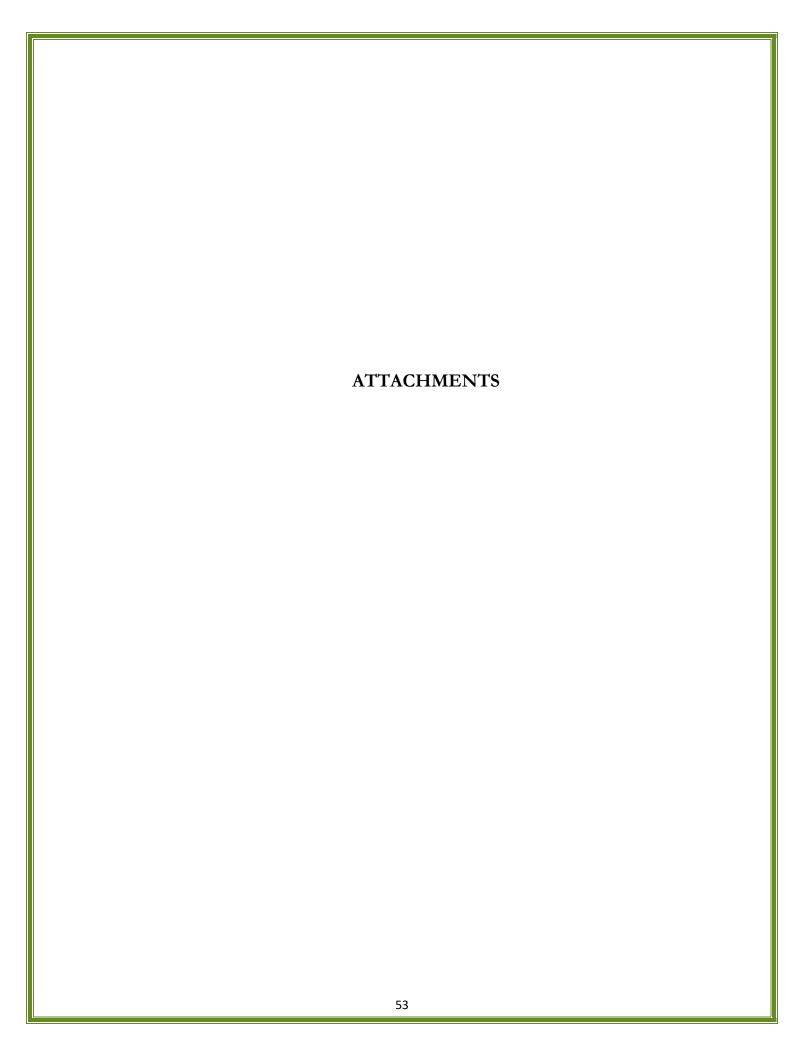
HACG's certifies that it has met the three statutory requirements of:

- 1) Assuring that at least 75% of the families assisted by the Agency are very low-income families.
- 2) Continuing to assist substantially the same total number of eligible low-income families as would have been served had the amounts not been combined; and
- 3) Maintaining a comparable mix of families (by family sized) are served, as would have been provided had the amounts not been used under the demonstration.

The certification is attached for review, please see Attachment A.

C. MTW Energy Performance Contract (EPC) Flexibility Data

This section is Not Applicable to HACG.





LISA L. WALTERS, CPM* CHIEF EXECUTIVE OFFICER

CERTIFICATION OF STATUTORY COMPLIANCE

On behalf of the Housing Authority of Columbus, Georgia (HACG), I certify that the agency has met the three statutory requirements of the Amended and Restated Moving-to-Work Agreement between the US Department of Housing and Urban Development (HUD) and HACG (effective July 3, 2013).

During FYE 2021, HACG has adhered to the following requirements:

- At least 75% of the families assisted by HACG are very low-income families;
- HACG has continued to assist substantially the same total number of eligible low-income families as would have been served had the amounts not been combined;
- HACG has maintained a comparable mix of families (by family size) served, as would have been provided had the amounts not been used under the demonstration

LISA WALTERS,

Chief Executive Officer

9-15-2021

DATE

