



*The
Housing
Authority
of Columbus, Georgia*

**FY 2022
ANNUAL
MTW PLAN**

**Public Comment Period:
January 20, 2021 through February 19, 2021**

ANNUAL MTW PLAN SUBMITTED BY:

The Housing Authority of Columbus, Georgia

Leadership Team

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Mr. John Greenman, Vice-Chairman
Mr. Edward Burdeshaw
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Ms. Sheila Crisp, Chief Financial Officer
Ms. Sabrina Richards, Chief of Property Management
Mr. John Casteel, Chief Assisted Housing Officer
Ms. Laura Johnson, Chief Real Estate Officer
Ms. Carla Godwin, MTW and Resident Services Administrator

Glossary of Abbreviations and Acronyms

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

Glossary of Abbreviations and Acronyms - continued

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

Glossary of Abbreviations and Acronyms - continued

SP	Section Nine (<i>Public Housing Rental Assistance Program</i>)
SEMAP	Section Eight Management Assessment Program
SRTO	Single-Room Occupancy Program (<i>Moderate Rehabilitation Certificates</i>)
TBV	Tenant-Protection Voucher
TSO	Tenant Selection Office
TTP	Total Tenant Payment
UA	Utility Allowance
URP	Utility Reimbursement Payment
VASH	Veterans Affairs Supportive Housing Voucher Program
VAWA	Violence Against Women Act
VI-SPDAT	Vulnerability Index – Services Prioritization Decision Assistance Tool
VMS	Voucher Management System

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B. Overview



The Housing Authority of Columbus, Georgia (HACG) was created in 1938 and is a public body, both corporate and politic, governed by a seven-member Board of Commissioners appointed to terms by the Mayor of the Columbus Consolidated Government. HACG is located on the west-central part of the State of Georgia in Muscogee County, approximately 90 minutes southwest of Atlanta and ranks as the third largest city in Georgia. Columbus is home to the U.S. Army Fort Benning and The Maneuver Center of Excellence, has the longest urban whitewater course in the world, and a zipline across the Chattahoochee River. The city has transformed the downtown with restaurants, retail, luxury apartments and hotels.

HACG also provides all maintenance, management, financial, and administrative services for three small housing authorities located within a 50-mile radius of Columbus, Georgia. These small authorities each have fewer than 80 dwelling units.

HACG's Mission Statement:

The mission of the Housing Authority of Columbus, Georgia, is to be the foremost provider of quality, affordable housing in the Columbus region by developing, revitalizing, and managing contemporary housing communities.

HACG is proud to be designated as 1 of 39 MTW agencies. HACG was designated as an MTW agency in December 2012 and entered into a 5-year MTW Agreement with the US Department of Housing and Urban Development (HUD), effective July 2, 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. The MTW designation has propelled HACG to accomplish its mission by allowing for redevelopment and RAD conversion. HACG actively supports and encourages other PHAs to participate in the MTW Expansion efforts.

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

HACG also sponsors and/or supports a Family Self-Sufficiency (FSS) Program, a Section 8 Homeownership Program, multiple Neighborhood Network Centers (NNC), and provides local transportation services for program participants at HACG-owned sites.

December 2020, HACG was the eighth Public Housing Authority to be awarded the "National Affordable Housing Accreditation" from The Affordable Housing Accreditation Board (AHAB)" and the fourth MTW agency to receive accreditation. The Accreditation is an award for a five-year period. Housing

providers are evaluated on 8 standards and 47 guidelines; each one measuring how effectively the organization's board, leadership and staff meet their mission of providing high quality affordable housing and related services. AHAB Accreditation encourages accredited organizations to continuously improve and excel in providing safe, well managed, high quality affordable housing in their communities.

MTW is a national demonstration program authorized by Congress which gives HACG the flexibility to waive certain statutes and HUD regulations pertaining to both housing assistance programs (housing choice vouchers and public housing). The MTW Program provides HACG opportunity to utilize the use of Federal dollars more efficiently, help residents find employment and become self-sufficient, and increase housing choices for low-income families by introducing new innovative ideas to HUD that addressing at least one of the three MTW statutory objectives.

The objectives are:

- 1. Reduce cost and achieve greater cost effectiveness in federal expenditures.**
- 2. Give incentives to families with children whose heads of household are either working, seeking work, or are participating in job training educational or other programs to assist in obtaining employment and becoming economically self-sufficient; and**
- 3. Increase housing choices for low-income families.**

HACG MTW activities are all designed to promote one or more of the MTW statutory objectives. HACG believes its MTW designation is the result of many years of laying the foundation for innovation at HACG and through the successful management of its housing assistance programs, as well as being an industry innovator. The MTW activities allows HACG to learn if the introduced idea provides a positive or negative impact to the agency and/or to the residents.

HACG provides this document for public inspection/review for all interested parties to share their thoughts and comments. The annual document was available for review and comment from January 20, 2021 through February 19, 2021, at the following locations:

- ◆ The Columbus Public Library, 3000 Macon Road;
- ◆ HACG's Central Office, 1000 Wynnton Road (front desk);
- ◆ HACG's Facebook: <https://www.facebook.com/The-Housing-Authority-of-Columbus-Georgia-110059770673833>
- ◆ HACG Website: <http://www.columbushousing.org>

In addition to the above means to comment on this document, HACG also held Public Hearings/meetings to receive comments on the 2022 Annual MTW Plan on the following dates and locations:

- ◆ January 20, 2021, Joint President Council Meeting via Zoom, at 2:00 p.m., Dial 1-646-876-9923 and use passcode 176594 to join the meeting or <https://zoom.us/j/94082581380?pwd=Qm5VU0ZlOUUo3bE1tQyttNlZUdG80dz09> Meeting ID: 940 8258 1380 Passcode 176594

- ◆ February 10, 2021, via Zoom, at 11:00 a.m., Dial 1-646-876-9923 and use passcode 221054 to join the meeting or <https://zoom.us/j/91527885640?pwd=dkd1KzZRdGJBL3JSRnFEbGliTkRkdz09>, Meeting ID: 915 2788 5640 Passcode 221054
- ◆ February 10, 2021, via Zoom at 3:00 p.m., Dial 1-646-876-9923 and use passcode 004768 to join the meeting or <https://zoom.us/j/91849894018?pwd=b2MvTCtiU2tFYlJXbGMxYWg4dDRCdz09>, Meeting ID: 918 4989 4017 Passcode 004768

All comments received prior to February 20, 2020, will be incorporated into the 2022 Adopted Annual MTW Plan. During fiscal year 2022 (July 1, 2021 through June 30, 2022), HACG seeks to implement actionable techniques and appropriate strategies to meet stated management goals and objectives listed in its plan.

2022 MTW SHORT-TERM GOALS AND OBJECTIVES

- ◆ Maximize use of MTW block-grant with full flexibility
 - Combine all PH operating subsidies, Section 8 HAP funds and capital funds
 - Use combined funds to meet HACG’s Strategic Plan goals and MTW Statutory Objectives
- ◆ Collect and analyze data on Approved MTW Activities for external and internal purposes
 - Monitor and track MTW data to complete plans, reports, and surveys
 - Strengthen MTW Activity reviews and recommendations for non-compliant issues
 - Cross reference HUD-approved MTW Activities with published guidance documents to ensure approved MTW Authorizations are relevant and necessary

APPROVED MTW ACTIVITIES

Activity 2014.02	Innovations to Reduce Homelessness - 150 TBVs for chronically homeless families - MTW Authorization: D.2.a, D.2.b, D.2.c, D.4
Activity 2014.03	Administrative Reforms - Sets asset threshold at \$50k and Sets income cap at 50% - MTW Authorization: D.3.a, D.3.b
Activity 2014.04	Administrative Efficiency - Places eligible families on triennial re-certification cycle - MTW Authorizations: D.1.c
Activity 2015.02	Portability Restrictions - Limits ports in and out of HACG to employment related reasons - MTW Authorizations: D.1.g
Activity 2015.03	Simplify Utility Allowance Calculation - Creates 3 UA schedules based on rental assistance program - MTW Authorizations: D.2.a

- Activity 2015.04** **Cap Childcare Deductions** - Denies childcare deductions that exceed GA CAPS maximum - MTW Authorizations: C.11, D.2.a
- Activity 2016.01** **Next Step Vouchers** - 10 TBVs for youth aging out of Foster Care
MTW Authorization: D.2.d, D.3.a, D.3.b, D.4
- Activity 2016.02** **Non-Competitive Project-Basing Process** - Allows HACG to project-base assistance without competition - MTW Authorization: D.7.a
- Activity 2016.03** **Project-Basing Flexibilities** - Exceed project-base caps, determine rent reasonableness, certify HQS on HACG units - MTW Authorization: D.1.e, D.2.c, D.5
- Activity 2018.01** **Eliminate/Reduce Interim Certification Examinations** - No interims for Contribution Income only families, 1 interim for all other families - MTW Authorization: C.11
- Activity 2018.02** **Site Based Housing Flexibility** - Allows HACG to over-house smaller families in larger units at all non-Public Housing site-based housing and all future TPV's, Allows HACG to provide gap payment assistance, up to the FMR, to the landlord on behalf of the over-housed family – MTW Authorization: D.1.b, D.2.b
- Activity 2019.01** **Minimum Rent Increase/Utility Reimbursement Payments (URPs) Decrease** - Increases the minimum rent to \$150 over 2 years, Eliminates processing URPs over 2-year period – MTW Authorizations: C.11, D.2.a
- Activity 2020.01** **Sponsor-Based Emergency Voucher Program** - 24 TBVs for emergency housing for flooding, fire, natural disasters, and condemned housing – MTW Authorization: Attachment D of MTW Agreement "Use of MTW Funds"

HACG CLOSED MTW ACTIVITIES

- Activity 2014.01** **Community Choice** – MTW Authorizations: D.2.a, D.2.b – Approved in 2015, Implemented in 2015, and Closed in 2019
- Activity 2014.05** **Streamline HQS Inspections** – (Moved to 2016.03) - MTW Authorizations: D.5 (moved to 2016.03) – Approved in 2014, Implemented in 2015, and Closed in 2017
- Activity 2014.06** **Rent Reform (Farley)** – MTW Authorizations: C.4, C.11 – Approved in 2014, Implemented in 2014, and Closed in 2018
- Activity 2015.01** **Eliminate Child Support Income from Rent Calculation** – MTW Authorizations: C.11 – Approved in 2015, Implemented in 2015, and Closed in 2017

2022 NON-MTW SHORT-TERM GOALS AND OBJECTIVES

HACG submitted a demolition application to SAC on January 23, 2020, for our public housing community known as Chase Homes (GA004000407) and it was approved on May 4, 2020. This demolition is based on environmental issues related to a large power station located adjacent to the site, an active rail line running through the site, and the proximity of the existing residential buildings to a busy thoroughfare (2nd Avenue).

In November 2019, HACG was awarded Low-Income Housing Tax Credits (LIHTC) for the redevelopment of affordable housing at this site. The construction of the new development has begun, which will mitigate environmental factors by placing the buildings further away from the power station and rail line. HACG is working with The Mill District Board in the overall objectives and visions of the Mill District and the City of Columbus for this area of the City. The new development in that area will be the catalyst for additional development commercial and residential. HACG and The Mill District Board were awarded and designated a member of Purpose-Built Communities.

HACG will submit a Section 18 demolition application to SAC to demolish two units in Building C301 (Unit #702G and 702H) at Warren Williams/Rivers Homes (GA004000405). These units are considered obsolete due to substantial physical deterioration as a result of foundation issues that cannot be corrected. Previous attempts to resolve the foundation issues did not alleviate the severe settlement problems at this location. The remaining units will continue with RAD conversion. The conversion will be a straight conversion and/or disposition with only critical repairs completed.

HACG received HUD approval on July 30, 2020, to demolish Building 704 consisting of 6 units at Elizabeth F. Canty Homes (GA004000408) due to the building being located in the floodway and could pose a safety risk to the residents and property. The remaining units will continue with the RAD conversion. The conversion will be a straight conversion and/or disposition with only critical repairs completed.

HACG has two mixed-financed properties with public housing units remaining. These properties were not included in the RAD Portfolio Award because they were constructed following the date of the RAD Portfolio Award. HACG will submit RAD applications for Patriot Pointe (24 units) and Columbus Commons (31 units).

The following are HACG plans for additional use of MTW Single Fund Flexibility:

- Expand HACG's affordable housing portfolio by acquisition of or development of affordable housing units
- Utilize MTW funds for extraordinary maintenance, enhanced security, and rehabilitation of HACG controlled existing affordable housing
- Strategically reduce debt at HACG controlled affordable housing in order to maintain financial viability
- Wireless Wi-Fi Infrastructure at all HACG developments
- Use MTW funds or charge the properties for Community Liaison personnel

MTW LONG-TERM GOALS & OBJECTIVES

- ◆ Position HACG to become designated as a Regional MTW Agency
 - Continue to monitor guidance documents from HUD, Federal Register, PIH Notices etc.
- ◆ Support HUD's efforts in the MTW Expansion
 - Consult/Advise other PHAs of the advantages of the MTW program
- ◆ Introduce new MTW initiatives that meet MTW Statutory Objectives
 - Propose MTW Activities that meet local housing needs
 - Workforce Housing – HACG may construct or acquire a development for this purpose
 - Evaluate the need for initiatives for targeted populations
 - Create a different rent calculation for elderly, employed and similar families
 - Provide an early childhood education program
 - Develop incentive initiatives related to education and employment
 - 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
 - Design a re-entry program, in partnership for ex-offenders
 - Establish an incentive for two parent households
 - Establish a minimum earned income
- ◆ Change Agency's fiscal year
 - Determine if fiscal year change is beneficial to HACG
 - Review fiscal years of partner agencies e.g., Federal, State, contracted PHAs, etc.
 - HACG is considering a move to a calendar fiscal year January to December
 - Must receive approval from HUD to change the Agency's fiscal year.

NON-MTW LONG-TERM GOALS & OBJECTIVES

Upon completion of the RAD conversion of Warren Williams (GA004000405) and Canty Homes (GA004000408), HACG will submit a 4% tax credit application to DCA for the rehabilitation and construction of these units.

(II.) GENERAL OPERATING INFORMATION

ANNUAL MTW PLAN

A. HOUSING STOCK INFORMATION

i. Planned New Public Housing Units

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

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

Total Public Housing Units to be Added in the Plan Year 0

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

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

N/A

ii. Planned Public Housing Units to be Removed

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

AMP NAME AND NUMBER	NUMBER OF UNITS TO BE REMOVED	EXPLANATION FOR REMOVAL
GA004000405 Warren Williams	184	Public Housing (PH) units planned for removal from PH stock are planned to be converted to long-term Section 8 assisted Project-Based Voucher (PBV) units under the RAD Program and/or SAC Demolition Approval.
GA004000408 Elizabeth Cauty	249	Public Housing (PH) units planned for removal from PH stock are planned to be converted to long-term Section 8 assisted Project-Based Voucher (PBV) units under the RAD Program and/or SAC Demolition Approval.
GA004000407 Chase Homes	108	Public Housing (PH) units planned for removal from PH stock are planned to be converted to affordable and long-term Section 8 assisted Project-Based Voucher (PBV) units under SAC Demolition Approval.
GA004000423 Patriot Pointe	24	Public Housing (PH) units planned for removal from PH stock are planned to be converted to long-term Section 8 assisted Project-Based Voucher (PBV) units under the RAD Program.
GA004000424 Columbus Commons	31	Public Housing (PH) units planned for removal from PH stock are planned to be converted to long-term Section 8 assisted Project-Based Voucher (PBV) units under the RAD Program.

596 Total Public Housing Units to be Removed in the Plan Year

iii. Planned New Project Based Vouchers

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

PROPERTY NAME	NUMBER OF VOUCHERS TO BE PROJECT-BASED	RAD?	DESCRIPTION OF PROJECT
Canty Homes	243	Yes	RAD conversion, Demolition
Warren Williams	184	Yes	RAD conversion
Mill Village (Chase Homes)	76	No	HCV PBV
Warm Springs Senior Village	50	No	HCV PBV
Patriot Pointe	24	Yes	RAD conversion
Columbus Commons	31	Yes	RAD conversion

608

Planned Total Vouchers to be Newly Project-Based

iv. Planned Existing Project Based Vouchers

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

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	PLANNED STATUS AT END OF PLAN YEAR*	RAD?	DESCRIPTION OF PROJECT
(GA004000406) Luther Wilson	288	288	YES	RAD PBV Units
(GA004000410) E.E. Farley	102	102	YES	RAD PBV Units
(GA004000412) Brown Nicholson	100	100	YES	RAD PBV Units
(GA004000416) E.J. Knight - Senior	40	40	YES	RAD PBV Units
(GA004000417) E.J. Knight - Family	52	52	YES	RAD PBV Units
(GA004000418) Ashley Station – Phase I	73	73	YES	RAD PBV Units
(GA004000418) Ashley Station – Phase II	73	73	YES	RAD PBV Units
(GA004000420) Arbor Pointe I	93	93	YES/NO	18 RAD PBV Units, 75 HCV PBV Units
(GA004000421) Arbor Pointe II	93	93	YES/NO	18 RAD PBV Units, 75 HCV PBV Units
(GA004000422) Cottages @ Arbor Pointe	120	120	YES/NO	19 RAD PBV Units, 101 HCV PBV Units
(GA004000423) Patriot Pointe	71	71	NO	HCV PBV Units
(GA004000424) Columbus Commons	60	60	NO	HCV PBV Units
(GA004000630) Willow Glen	28	28	NO	HCV PBV Units

1193

Planned Total Existing Project-Based Vouchers

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

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

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

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

HACG received SAC approval for the Chase Homes demolition application and also received 108 tenant protection vouchers to relocate the residents. Demolition began in December 2020. Once demolition is complete HACG will begin the new development on the original Chase site away from the power station, rail line, and 2nd Avenue. Chase residents will have a preference to return to the new development. HACG is working with the Mill District Board in the overall objectives and visions of the Mill District and the City of Columbus for this area of the City. A new development in the area will be a catalyst for additional development commercial and residential. HACG and The Mill District Board were awarded and designated a member of Purpose-Built Communities.

HACG received HUD approval on July 30, 2020, to demolish Building 704 consisting of 6 units at Elizabeth F. Canty Homes due to the building being located in the floodway and could pose a safety risk to the residents and property.

HACG will submit a Section 18 demolition application to SAC to demolish two units in Building C301 (Unit #702G and 702H) at Warren Williams/Rivers Homes (GA004000405). These units are considered obsolete due to substantial physical deterioration as a result of foundation issues that cannot be corrected. Previous attempts to resolve the foundation issues did not alleviate the severe settlement problems at this location.

HACG anticipates the possibility of acquiring property or building a workforce housing community focused on providing subsidized housing for “working poor” families.

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

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

GENERAL DESCRIPTION OF ALL PLANNED CAPITAL EXPENDITURES DURING THE PLAN YEAR

HACG’s Capital Fund (CFP) totals about \$2.1M, where the balance of the CFP total will be committed/obligated to RAD Projects II and III. Expenditures may include costs associated with the modernization of Williams and Canty necessary to rehabilitate the sites to meet RAD requirements. Expenditure plans include Section 8 landlord payments and other expenditures related to converting PH units under RAD and/or specialty consulting services, such as environmental testing, survey and legal work, code research, and other activities necessary to complete the RAD portfolio conversion. Also, expenditures may include the purchase and renovation of a new Section 8 office. Finally, CFP planned expenditures may include physical improvements, enhanced security, management improvements, Agency-wide non-dwelling structures and equipment, administrative and operation fees, and costs, as well as preventative and routine maintenance to dwelling structures Agency-wide, minor pre- and post-construction costs for preliminary and completed project plans as well as Gap financing for new developments.

B. LEASING INFORMATION

i. Planned Number of Households Served

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

PLANNED NUMBER OF HOUSEHOLDS SERVED THROUGH:	PLANNED NUMBER OF UNIT MONTHS OCCUPIED/LEASED*	PLANNED NUMBER OF HOUSEHOLDS TO BE SERVED**
MTW Public Housing Units Leased	5,052	421
MTW Housing Choice Vouchers (HCV) Utilized	44,448	3,704
Local, Non-Traditional: Tenant-Based^	0	0
Local, Non-Traditional: Property-Based^	0	0
Local, Non-Traditional: Homeownership^	0	0
Planned Total Households Served	49,500	4,125

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

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

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

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

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

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

HOUSING PROGRAM	DESCRIPTION OF ANTICIPATED LEASING ISSUES AND POSSIBLE SOLUTIONS
MTW Public Housing	Leasing issues due to COVID-19, employee absences and past debts to landlords and utilities. There is no short-term solution.
MTW Housing Choice Voucher	The rental market is saturated partially due to eviction moratorium, therefore making it more difficult to find affordable housing. HACG has raised its payment standards to 100% and is granting extensions, as necessary. Landlords unwillingness to show vacant units because of COVID risks of willingness to leave a unit vacant because of eviction moratorium. There is no short-term solution.
Local, Non-Traditional	N/A

C. WAITING LIST INFORMATION

i. Waiting List Information Anticipated

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

WAITING LIST NAME	DESCRIPTION	NUMBER OF HOUSEHOLDS ON WAITING LIST	WAITING LIST OPEN, PARTIALLY OPEN OR CLOSED	PLANS TO OPEN THE WAITING LIST DURING THE PLAN YEAR
Federal MTW Housing Choice Vouchers	Community-wide	440	Closed	No
MTW Rapid Rehousing Vouchers; MTW Next Step Vouchers	Program Specific	0	Partially Open	Yes
Federal MTW Public Housing Units; Converted PH Units to RAD Project-Based Vouchers	Merged	6,243	Open	Yes

Please describe any duplication of applicants across waiting lists:

Applications for Public Housing may also be included on the RAD Community wide PBV Waitlist.

ii. Planned Changes to Waiting List in the Plan Year

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

WAITING LIST NAME	DESCRIPTION OF PLANNED CHANGES TO WAITING LIST
MTW TBV Wait List	MTW TBV Wait List may open temporarily in fiscal year (2022)
N/A	N/A

III. PROPOSED MTW ACTIVITIES: HUD APPROVAL REQUESTED

HACG does not have any new proposed activities.

IV. APPROVED MTW ACTIVITIES

A. Implemented MTW Activities

Activity 2014.02	Innovations to Reduce Homelessness - MTW Authorization: D.2.a, D.2.b, D.2.c, D.4 – Approved: 2014 – Implemented: 2014 – Amended: 2020
Activity 2014.03	Administrative Reforms - MTW Authorization: D.3.a, D.3.b – Approved: 2014 – Implemented: 2014 – Amended: N/A
Activity 2014.04	Administrative Efficiency - MTW Authorizations: D.1.c – Approved: 2014 – Implemented: 2014 – Amended: N/A
Activity 2015.02	Portability Restrictions - MTW Authorizations: D.1.g – Approved: 2015 – Implemented: 2016 – Amended: N/A
Activity 2015.03	Simplify Utility Allowance Calculation - MTW Authorizations: D.2.a – Approved: 2015 – Implemented: 2015/2016 – Amended: N/A
Activity 2015.04	Cap Childcare Deductions - MTW Authorizations: C.11, D.2.a – Approved: 2015 – Implemented: 2015 – Amended: N/A
Activity 2016.01	Next Step Vouchers - MTW Authorization: D.2.d, D.3.a, D.3.b, D.4 – Approved: 2016 – Implemented: 2018 – Amended: N/A
Activity 2016.02	Non-Competitive Project-Basing Process - MTW Authorization: D.7.a – Approved: 2016 – Implemented: 2018 – Amended: N/A
Activity 2016.03	Project-Basing Flexibilities - MTW Authorization: D.1.e, D.2.c, D.5 – Approved: 2016 – Implemented: 2018 – Amended: 2019
Activity 2018.01	Eliminate/Re-duce Interim Certification Examinations - MTW Authorization: C.11 – Approved: 2018 – Implemented: 2019 – Amended: N/A
Activity 2018.02	Site Based Housing Flexibility - MTW Authorization: D.1.b, D.2.b – Approved: 2018 – Implemented 2019 – Amended: 2019, 2020, and 2021
Activity 2019.01	Minimum Rent Increase/Utility Reimbursement Payments (URPs) Decrease - MTW Authorizations: C.11, D.2.a – Approved: 2019 – Implemented: 2019 – Amended: 2019

Activity 2020.01 **Sponsor-Based Emergency Voucher Program** - MTW Authorization:
Attachment D of MTW Agreement "Use of MTW Funds" – Approved: 2020 –
Implemented: 2020 – Amended: N/A

2014.02 Innovations to Reduce Homelessness

This activity sets aside 150 vouchers TBVs that links permanent supportive housing to supportive services for chronically homeless families as a top preference. Secondary preference is homeless individuals or individuals who are living in a place not meant for human habitation or in an emergency shelter, in transitional housing, or are exiting an institution where they temporarily resided up to 90 days. The activity includes a tiered rent schedule, minimum rent waiver and selection preference to the targeted group. Also, HACG is interested to learn if housing stability positively impacts household income, earned income and other socio-economic categories.

Order of preference:

1. Chronically homeless veterans
2. Chronically homeless individuals
3. Homeless veterans
4. Homeless individuals

In addition, the activity places a special emphasis on military veterans, where veterans are a priority preference and newly employed veterans are eligible for employment incentives.

Employment incentives for veterans include:

- ◆ Waiving the minimum rent to assist veterans in focusing on employment (first 12 months)

Employment incentives for “unemployed” veterans that gain employment while in the “program” include:

- ◆ Employment – tiered rent calculation (Veterans only)
 - 26% rent calculation for 12 months – year 1
 - 27% rent calculation for 12 months – year 2
 - 28% rent calculation for 12 months – year 3
 - 29% rent calculation for 12 months – year 4
 - 30% rent calculation for 12 months – year 5

HACG anticipates the following for the Innovations to Reduce Homelessness Activity in FYE 2022:

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

2014.03 Administrative Reforms (HCV Only)

This activity is designed to improve operational efficiencies and reduce operational costs by streamlining the rent calculation process and increase housing choices for program participants.

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

HACG initiated procedures to close-out the PH elements in its 2017 Annual MTW Report due to RAD conversions using Low-Income Housing Tax Credit funds.

HACG anticipates the following for the Administrative Reforms Activity in FYE 2022:

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

2014.04 Administrative Efficiencies (HCV Only)

This activity is designed to improve operational efficiencies and reduce operational costs by introducing a triennial recertification cycle for elderly/disabled families. The opportunity to place elderly/disabled families on a triennial recertification cycle is determined on the head-of-household's (HOH) designation and the household income source(s).

Activity metrics are being tracked and reported in HACG's Annual MTW Report. Originally, this activity included public housing element, which has become functionally obsolete due to RAD conversion using Low-Income Housing Tax Credit funds.

Currently, HACG continues to conduct "mini-interims" on off-year program participants to reduce "sticker shock" related to rent changes 3-years later. HACG continues to conduct full certification examinations during participants scheduled triennial period.

HACG anticipates the following for the Administrative Efficiencies Activity in FYE 2022:

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

2015.02 Portability Restrictions

This activity restricts the movement of vouchers into and out of HACG's service jurisdiction. Voucher portability is limited to verifiable employment related reasons. The combined actions of "porting" to higher cost-of-living jurisdictions and voucher holders' lower earnings, limited HACG's ability to issue more vouchers and assist families in its own jurisdiction.

Verifiable employment may include the following:

- ◆ A letter of intent to employ (job offer letter), reassign, transfer, and similar
- ◆ Permanent Change of Station (PCS) orders, transfer orders, and similar
- ◆ Document on company letterhead, which will assist HACG in deciding the acceptance of ports in or out of Columbus, GA

Families may lose their rental assistance if a loss of employment occurs at the new location within the first six-months or before agency absorption occurs.

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

HACG anticipates the following for the Portability Restrictions Activity in FYE 2022:

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

2015.03 Simplify Utility Allowance Calculation

This activity streamlines the rental calculation process with a simplified Utility Allowance Schedule (UA) used throughout all the different rental assistance portfolio of HACG. The activity supports a UA schedule for 3 rental assistance programs in HACG portfolio:

- ◆ HCV (PBV and TBV)
- ◆ PH and RAD PBV
- ◆ Mixed Financed Sites (HUD UA Schedule)

Activity metrics are being tracked and reported in HACG's Annual MTW Report. The agency actively uses the UA Schedules and transitions schedules between programs due to the PH conversion to RAD PBVs.

HACG anticipates the following for the Simplify Utility Allowance Calculation Activity in FYE 2022:

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

2015.04 Cap Childcare Deduction

This activity modifies applicable rules and regulations necessary to limit the amount of childcare deduction able to be taken by program participants. The activity allows HACG to place a cap on childcare deductions in line with the Georgia Childcare and Parent Services (GA CAPS) reimbursement amounts. GA CAPS helps low-income families afford safe, and quality childcare by subsidizing childcare costs for children under the age of 13.

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

Families continue to furnish proof of their out-of-pocket childcare expenses and HACG staff simply verifies that provided costs are in-line with GA CAPS based on the child's age and service provider. HACG's rental assistance departments are charged with maintaining an updated GA CAPS chart.

HACG anticipates the following for the Cap Childcare Dependent Deduction Activity in FYE 2022:

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

2016.01 Next Step Vouchers

This activity modifies applicable rules and regulations necessary to dedicate up to 10 TBVs for clients of the Georgia Department of Health and Human Services (GA DHHS), Division of Family and Children Services (DFCS) office. The referrals and required verification are through Home for Good. The activity serves as a homelessness prevention tool for youth aging out of Foster Care.

The following are requirements of the participants:

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

- ◆ Attend school an average of 20-hours per week; and/or
- ◆ Attend job training course an average of 20-hours per week.

Foster youth are required to exhaust DFCS resources first before being issued a Next Step Voucher (NSV). The primary intent is to ensure Foster youth are stabilized and ready to receive TBV.

HACG anticipates the following for the Next Step Vouchers (NSV) Activity in FYE 2022:

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

2016.02 Non-Competitive Project-Basing Process

This activity modifies applicable rules and regulations as necessary to project-base Section 8 rental assistance at HACG owned (direct & indirect ownership) properties without competition.

Under this activity, HACG implemented plans to project-base Section 8 rental assistance at properties it redeveloped which are Patriot Pointe and Columbus Commons. HACG will also use this activity for newly constructed housing and substantially rehabilitated properties to receive subsidy.

HACG will apply activity elements to convert the 55 PH units at Patriot Pointe and Columbus Commons after fiscal year 2021.

HACG anticipates the following for the Non-Competitive Project-Basing Process Activity in FYE 2022:

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

2016.03 Project-Basing Flexibilities

This activity allows HACG to modify its HCV Program guidelines. HACG can project-base more than 25% (or in the case of the RAD Program, more than 50%) of the building cap. Also, HACG is allowed to determine rent reasonableness at HACG-owned (direct and indirect ownership) and allows HACG to certify housing at HACG-owned units.

When PHAs exceed the 25% per building cap (or 50% cap on RAD buildings) on PBV units with Section 8 rental assistance in an existing building in multi-family communities, there is a supportive services requirement attached to the current PBV regulations for exceeding these caps. Under this activity HACG

can project-base up to 100% of a building's units, as well as waive the participation requirement of families in the "excepted" units.

Currently, HACG offers limited Supportive Services at the RAD developments. HACG understands that supportive services must be available, and the families are aware of and strongly encouraged to participate in offered services; however, it is noted that participation by families living in "excepted" units is not mandatory, nor required.

HACG anticipates the following for the Project-Basing Flexibilities Activity in FYE 2022:

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

2018.01 Eliminate/Reduce Interim Certification Examinations

This activity allows HACG to modify its Housing Choice Voucher (HCV) and Public Housing (PH) Programs guidelines to increase staff productivity, assist program 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 and intake and/or annual certification examination.

To accomplish this activity, HACG has implemented the following:

- ◆ Eliminated interim certification examinations on Contribution Income
- ◆ Program participants that report contribution income cannot report a loss of contribution income for 12 months
- ◆ Limited program participants to 1 interim certification examination annually for all other income related adjustments (after 90 days or before 90 days of annual re-certification)

In March 2020, Centers for Disease Control and Prevention (CDC) responded to a pandemic of respiratory disease spreading from person-to-person caused by a new coronavirus which they named Coronavirus Disease 2019 (COVID-19) This situation poses a serious public health risk. The federal, state, and local governments encouraged people to stay home and away from large gatherings of 10 or more. Several businesses are taking precaution and closed for two weeks and possibly longer in order to lessen the spread of the disease, which results in many of our residents without work. As of January 2021, COVID-19 still poses a serious risk to public health and continues to impact the employment.

HACG updated the Hardship Case Criteria to include language regarding any health/economic hardships associated with COVID-19, see item D. below. HACG continues to address hardship requests on a case-by-case basis according to the Hardship Policy.

HARDSHIP CASE CRITERIA

HACG will consider extenuating circumstances on a case-by-case basis in which households reporting Contribution Income may be exempted or temporarily waived from these new rent determination rules that include the following:

- A. HACG will consider temporarily waiving requirements from these new rent determination rules for program participants when program participants citing Contribution Income as their sole source of income produce evidence that the Contribution Income provider is medically incapacitated. The family's contributor's incapacities must be for an extended period (30+ consecutive days) that directly impacts the contributor's ability to maintain agreed upon monthly contribution. The loss of such contribution must directly impact a family's independent living needs, such as shelter, food, utilities, and/or similar expenses.

HACG reserves the right to analyze the impact of the contribution to social service benefits, subsidy level, and other circumstances in its calculation to determine length of time and/or reduction in family's fair share of rent.

- B. HACG will consider exemption of requirements from these new rent determination rules for program participants when program participants citing Contribution Income as their sole source of income produce evidence that the Contribution Income provider is deceased. The family has 15-days from contributors passing to provide HACG with the proper documents. HACG will consider retroactive changes when proper documentation within the timeframe is provided. When a family provides the documentation after 15-days, the family remains responsible for their fair share of the rent until changes are made. HACG will make rent changes effective within the standard 30-day timeframe.

HACG reserves the right to analyze the impact of the contribution to social service benefits, subsidy level, and other circumstances in its calculation to determine the length of time and/or reduction in the family's fair share of rent.

- C. HACG will not consider hardship cases under this activity when other income sources are included in the rent calculation as a result of the eligibility interview/certification process.
- D. HACG will consider temporarily waiving requirements from the rent determination rules for program participants experiencing a reduction in income or work hours as a result of any health/economic hardships associated with COVID-19.

HACG anticipates the following for the Eliminate/Reduce Interim Certification Examinations Activity in FYE 2022:

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

2018.02 Site-Based Housing Flexibility

This activity allows HACG to over-house eligible, qualified low-income families at all non-Public Housing site-based housing developments as well as Tenant Protection Vouchers (TPV) awarded to HACG for Ralston Towers residents and provide rental 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 appropriate 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 relocated unit for the duration of their voucher or until they move out of their unit to a new unit.

HACG amended this activity in FY 2021 to include all future TPV's to be eligible up to one size larger and provide the rental payment assistance for the families to the landlord for the difference between the assigned unit size and the eligible family's income means and/or voucher amount up to 120% of the Fair Market Rent (FMR) of the assigned bedroom unit.

HACG anticipates the following for the Site-Based Housing Flexibility Activity in FYE 2022:

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

2019.01 Eliminate/Reduce 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 will increase the minimum rent to \$150 to eliminate URPs (or at the least significantly reduce the number of URPs processed) over the next two years. The increase in minimum rent across all rental assistance programs significantly reduces negative rent situation that require an URP check.

Further, HACG’s schedule for increasing the minimum rent is as follows:

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

HACG provided significant lead time of notification to residents and does not anticipate any undue hardship because of the URP elimination. As needed, HACG will confer with its Hardship Policy on a case-by-case basis.

HACG anticipates the following for the Eliminate/Reduce Utility Reimbursement Payments (URPs) Activity in FYE 2022:

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

2020.01 Sponsor-Based Emergency Voucher Program (EVP)

This activity sets aside 24 TBV’s for Emergency Housing for families affected by local natural disasters, fire, flooding or notice to condemn property prompted by local government action in Muscogee County. The TBV’s is limited to a 6-month period which allows the individual or families to process insurance claims, contract family members and stabilize their finances. This activity is not intended to assist individual single families housing displaced by natural disasters but rather families residing in multifamily developments where six or more units are affected by natural disasters, fire, flooding, or government condemned properties. HACG offers a top preference for eligible families on our waiting list that experience these types of emergencies. However, all the families receiving these temporary emergency vouchers are currently not in HACG assisted housing.

HACG will issue a flat-rate subsidy of \$600 per month per family to the Sponsor-Based Partner. HACG entered into a partnership agreement with Home for Good (HfG) on January 27, 2020. When emergency situation occurs, HfG will contact HACG to arrange for emergency housing provided with the EVP MTW Activity. To expediate the move-in-process, the family will have 30 days to income qualify. HfG will provide basic HQS inspections on the selected housing before move-in.

HACG anticipates the following for the Sponsor-Based Emergency Voucher Program (EVP) Activity in FYE 2022:

- ◆ No non-significant changes to this activity

- ◆ No modifications to the metrics during the period
- ◆ No different authorizations are needed to implement this activity than originally proposed
- ◆ No significant changes to this activity

B. NOT YET IMPLEMENTED ACTIVITIES

HACG does not have any activities that is not yet implemented.

C. ACTIVITIES ON HOLD

HACG does not have any activities on hold.

D. CLOSED OUT ACTIVITIES

Activity 2014.01 **Community Choice** – MTW Authorizations: D.2.a, D.2.b – Approved in 2015, Implemented in 2015, and Closed in 2019 – HACG closed out this activity because the evaluation period was complete.

Activity 2014.05 **Streamline HQS Inspections** – (Moved to 2016.03) - MTW Authorizations: D.5 (moved to 2016.03) – Approved in 2014, Implemented in 2015, and Closed in 2017 – Authorizations for this activity is granted under Notice PIH 2016-05, therefore HACG closed this activity.

Activity 2014.06 **Rent Reform (Farley)** – MTW Authorizations: C.4, C.11 – Approved in 2014, Implemented in 2014, and Closed in 2018 – HACG closed out this activity because the evaluation period was complete.

Activity 2015.01 **Eliminate Child Support Income from Rent Calculation** – MTW Authorizations: C.11 – Approved in 2015, Implemented in 2015, and Closed in 2017 – HACG used LIHTC funds to meet RAD requirements, which made this MTW Activity functionally obsolete.

Also closed out the Public Housing (PH) elements under MTW Activities 2014.03 and 2014.04. HACG used LIHTC funds to meet RAD requirements, which made PH elements functionally obsolete.

(V.) SOURCES AND USES OF MTW FUNDS

ANNUAL MTW PLAN

A. ESTIMATED SOURCES AND USES OF MTW FUNDS

i. Estimated Sources of MTW Funds

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

FDS LINE ITEM NUMBER	FDS LINE ITEM NAME	DOLLAR AMOUNT
70500 (70300+70400)	Total Tenant Revenue	\$850,000
70600	HUD PHA Operating Grants	\$25,158,042
70610	Capital Grants	\$1,525,000
70700 (70710+70720+70730+70740+70750)	Total Fee Revenue	\$665,000
71100+72000	Interest Income	\$525,000
71600	Gain or Loss on Sale of Capital Assets	\$0
71200+71300+71310+71400+71500	Other Income	\$1,525,000
70000	Total Revenue	\$30,248,042

ii. Estimated Uses of MTW Funds

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

FDS LINE ITEM NUMBER	FDS LINE ITEM NAME	DOLLAR AMOUNT
91000 (91100+91200+91400+91500+91600+91700+91800+91900)	Total Operating - Administrative	\$5,879,324
91300+91310+92000	Management Fee Expense	\$80,000
91810	Allocated Overhead	\$0
92500 (92100+92200+92300+92400)	Total Tenant Services	\$424,430
93000 (93100+93600+93200+93300+93400+93800)	Total Utilities	\$506,066
93500+93700	Labor	\$0
94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	\$2,497,725
95000 (95100+95200+95300+95500)	Total Protective Services	\$37,119
96100 (96110+96120+96130+96140)	Total Insurance Premiums	\$500,584
96000 (96200+96210+96300+96400+96500+96600+96800)	Total Other General Expenses	\$2,266,027
96700 (96710+96720+96730)	Total Interest Expense & Amortization Cost	\$10,185
97100+97200	Total Extraordinary Maintenance	\$19,750
97300+97350	HAP + HAP Portability-In	\$16,854,457
97400	Depreciation Expense	\$1,172,375
97500+97600+97700+97800	All Other Expense	\$0
90000	Total Expenses	\$30,248,042

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

N/A

iii. Description of Planned Use of MTW Single Fund Flexibility

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

PLANNED USE OF MTW SINGLE FUND FLEXIBILITY

HACG uses the MTW Single-Fund flexibility to combine its funding sources to form the MTW Block Grant that will be used to administer current and future MTW Activities, rehabilitation associated with RAD, construction and/or Gap/Debt Financing of new developments, and to purchase and renovate a new Section 8 office. Additional Use of MTW Single Fund Flexibility is the following: Expand HACG’s affordable housing portfolio by acquisition of or development of affordable housing units; utilize MTW funds for extraordinary maintenance, enhanced security, and rehabilitation of HACG controlled existing affordable housing; assist with providing Wi-Fi Infrastructure for all HACG properties; fund Community Liaison personnel; and strategically reduce debt at HACG controlled affordable housing in order to maintain financial viability. The MTW Single-Fund Flexibility will be used to continue operations during any current and future government shutdown.

B. LOCAL ASSET MANGEMENT PLAN

- i. Is the MTW PHA allocating costs within statute?
- ii. Is the MTW PHA implementing a local asset management plan (LAMP)?
- iii. Has the MTW PHA provide a LAMP in the appendix?
- iv. If the MTW PHA has provided a LAMP in the appendix, please describe any proposed changes to the LAMP in the Plan Year or state that the MTW PHA does not plan to make any changes in the Plan Year.

C. RENTAL ASSISTANCE DEMONSTRATION (RAD) PARTICIPATION

i. Description of RAD Participation

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

RENTAL ASSISTANCE DEMONSTRATION (RAD) PARTICIPATION

HACG received a Portfolio Award January 7, 2014 to convert 1,321 to Project-Based Vouchers under RAD Component One.

As of this Plan date, HACG has converted 783 units to RAD PBV as well as 410 units to HCV PBV. Chase Homes (GA004000407) consisting of 108 units are removed from the RAD conversion due to SAC Section 18 demolition approval. The CHAP for Chase Homes was returned on May 14, 2020. Elizabeth F. Canty Homes (GA004000408) Building 704 consisting of 6 units are removed from the RAD conversion due to the building being located in the floodway and could pose a safety risk to the residents and property. HACG has received CHAP awards for the remaining 427 units. HACG has two mixed-financed properties with public housing units remaining. These properties were not included in the RAD Portfolio Award because they were constructed following the date of the RAD applications for Patriot Pointe (31 units) and Columbus Commons (24 units). Including these properties, HACG will have a total of 482 units to convert to RAD, as well as 126 HCV PBV included in the new development of Chase Homes (Mill Village) and Warm Springs Senior Village.

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

No

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

N/A

VI. ADMINISTRATIVE

A. RESOLUTION ADOPTING THE ANNUAL MTW PLAN

The Board resolution adopting the 2022 Annual MTW Plan is located in the Appendix Section. HACG Board of Commissioners adopted Resolution #3378 at its March 17, 2021, board meeting.

B. DOCUMENTATION OF PUBLIC PROCESS

The Annual MTW Plan was available for public review from January 20, 2021 through February 19, 2021, at the following locations:

- ◆ The Columbus Public Library, 3000 Macon Road;
- ◆ HACG's Central Office, 1000 Wynnton Road (front desk);
- ◆ HACG's Facebook: <https://www.facebook.com/The-Housing-Authority-of-Columbus-Georgia-110059770673833>
- ◆ HACG Website: <http://www.columbushousing.org>

- ◆ HACG advertised all Public Hearings and Public Meetings in accordance with the Annual MTW Plan guidelines.

In addition to the above means to comment on this document, HACG also held Public Hearings/meetings to receive comments on the Annual MTW Plan on the following dates and locations:

- ◆ January 20, 2021, Joint President Council Meeting via Zoom, at 2:00 p.m., Dial 1-646-876-9923 and use passcode 176594 to join the meeting or <https://zoom.us/j/94082581380?pwd=Qm5VU0ZIOUo3bE1tQyttNIZUdG80dz09> Meeting ID: 940 8258 1380 Passcode 176594
- ◆ February 10, 2021, via Zoom, at 11:00 a.m., Dial 1-646-876-9923 and use passcode 221054 to join the meeting or <https://zoom.us/j/91527885640?pwd=dkd1KzZRdGJBL3JSRnFEbGliTkRkdz09>, Meeting ID: 915 2788 5640 Passcode 221054
- ◆ February 10, 2021, via Zoom at 3:00 p.m., Dial 1-646-876-9923 and use passcode 004768 to join the meeting or <https://zoom.us/j/91849894018?pwd=b2MvTCtiU2tFYlJXbGMxYWg4dDRCdz09>, Meeting ID: 918 4989 4017 Passcode 004768

All comments received prior to February 20, 2021, were incorporated into the Annual MTW Plan. Comments are located in the Appendix Section.

C. PLANNED AND ONGOING EVALUATIONS

HACG's does not have any planned and ongoing evaluations.

D. LOBBYING DISCLOSURES

HUD Forms SF-LLL and HUD-50071 are located in the Appendix Section.

APPENDIX SECTION

RESOLUTION NO: 3378**A RESOLUTION APPROVING THE MOVING TO WORK (MTW) DEMONSTRATION PROGRAM'S FISCAL YEAR 2022 ANNUAL PLAN AND SUBMISSION OF SAID PLAN AND PLAN'S CERTIFICATIONS OF COMPLIANCE TO THE DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT (HUD)**

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

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

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

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

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

WHEREAS, the proposed FY 2022 Annual MTW Plan was made available for public review and comment from January 20, 2021 to February 19, 2021, and public hearings/meetings were held on the proposed FY 2022 Plan on February 10, 2021; and,

WHEREAS, HACG considered all comments received regarding said FY 2022 MTW Plan:

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

1. The HACG's FY 2022 Annual MTW Plan is approved.
2. The Chairman or Secretary/Chief Executive Officer is authorized to execute the Certifications of Compliance; and,
3. Submission of said Certifications and FY 2022 Annual MTW Plan to HUD is authorized.

R. Larry Cardin
Name of Authorized Official

March 17, 2021
Date

R. Larry Cardin
Signature

CERTIFICATIONS OF COMPLIANCE

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT OFFICE OF PUBLIC AND INDIAN HOUSING

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

Acting on behalf of the Board of Commissioners of the Moving to Work Public Housing Agency (MTW PHA) listed below, as its Chairman or other authorized MTW PHA official if there is no Board of Commissioners, I approve the submission of the Annual Moving to Work Plan for the MTW PHA Plan Year beginning July 1, 2021, hereinafter referred to as "the Plan", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:

- (1) The MTW PHA published a notice that a hearing would be held, that the Plan and all information relevant to the public hearing was available for public inspection for at least 30 days, that there were no less than 15 days between the public hearing and the approval of the Plan by the Board of Commissioners, and that the MTW PHA conducted a public hearing to discuss the Plan and invited public comment.
- (2) The MTW PHA took into consideration public and resident comments (including those of its Resident Advisory Board or Boards) before approval of the Plan by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the Annual MTW Plan.
- (3) The MTW PHA certifies that the Board of Directors has reviewed and approved the budget for the Capital Fund Program grants contained in the Capital Fund Program Annual Statement/Performance and Evaluation Report, form HUD-50075.1 (or successor form as required by HUD).
- (4) The MTW PHA will carry out the Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990.
- (5) The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.
- (6) The Plan contains a certification by the appropriate state or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice, for the MTW PHA's jurisdiction and a description of the manner in which the Plan is consistent with the applicable Consolidated Plan.
- (7) The MTW PHA will affirmatively further fair housing by fulfilling the requirements at 24 CFR 903.7(o) and 24 CFR 903.15(d), which means that it will take meaningful actions to further the goals identified in the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR 5.150 through 5.180, that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing, and that it will address fair housing issues and contributing factors in its programs, in accordance with 24 CFR 903.7(o)(3). Until such time as the MTW PHA is required to submit an AFH, and that AFH has been accepted by HUD, the MTW PHA will address impediments to fair housing choice identified in the Analysis of Impediments to fair housing choice associated with any applicable Consolidated or Annual Action Plan under 24 CFR Part 91.
- (8) The MTW PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
- (9) In accordance with 24 CFR 5.105(a)(2), HUD's Equal Access Rule, the MTW PHA will not make a determination of eligibility for housing based on sexual orientation, gender identify, or marital status and will make no inquiries concerning the gender identification or sexual orientation of an applicant for or occupant of HUD-assisted housing.
- (10) The MTW PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
- (11) The MTW PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
- (12) The MTW PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.
- (13) The MTW PHA will comply with requirements with regard to compliance with restrictions on lobbying required by 24 CFR Part 87, together with disclosure forms if required by this Part, and with restrictions on payments to influence Federal Transactions, in accordance with the Byrd Amendment and implementing regulations at 49 CFR Part 24.

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

The Housing Authority of Columbus, Georgia
MTW PHA NAME

GA 004
MTW PHA NUMBER/HA CODE

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

Lisa L. Walters
NAME OF AUTHORIZED OFFICIAL

Secretary, HACG Board of Commissioners
TITLE


SIGNATURE

March 17, 2021
DATE

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

**HOUSING AUTHORITY OF COLUMBUS, GEORGIA'S
PUBLIC COMMENT PROCESS**

Date	Action / Event	Attendance Count
Wednesday, January 20, 2021, Friday, January 22, 2021, and Sunday, January 24, 2021	Public Hearing announcement, dates published in the Ledger-Enquirer (Columbus' local newspaper), HACG's Facebook, and on HACG's website, www.columbushousing.org	Not Applicable
Wednesday, January 20, 2021	2 p.m. Public Meeting: HACG staff presented 2022 Annual MTW Plan at the Joint President Council Meeting via Zoom.	24
Friday, February 5, 2021	Sent email to HACG staff/affiliates announcing public hearing. Included flyer for recipients to print/post in conspicuous areas for clients, employees, landlords, residents, and visitors to see.	36
Wednesday, February 10, 2021	11 a.m. Public Hearing: HACG staff presented FY 2022 Annual MTW Plan at the Public Meeting via Zoom	10
Wednesday, February 10, 2021	3 p.m. Public Hearing: HACG staff presented FY 2022 Annual MTW Plan at the Public Meeting via Zoom	6

PUBLIC HEARING - TUESDAY, FEBRUARY 10, 2021 AT 11:00 A.M.

FY 2022 ANNUAL MTW PLAN

PUBLIC COMMENTS AND RESPONSES

Line	Public Comment	HACG's Response
1	HACG did not receive any comments	N/A

PUBLIC HEARING - TUESDAY, FEBRUARY 10, 2021 AT 3:00 P.M.

FY 2022 ANNUAL MTW PLAN

PUBLIC COMMENTS AND RESPONSES

Line	Public Comment	HACG's Response
1	Resident from Warren Williams asked if they could be added to the Section 8 waiting list as they would like to move to a house.	HACG responded: The only way to be added to the Section 8 waiting list is to apply once the waiting list is open and available. HACG did inform her about the FSS program and who to contact to receive more information.
2	Resident from Canty asked how MTW helped the residents.	HACG responded: HUD gives HACG funding flexibility to provided more affordable housing, efficient housing programs, and to help low-income residents become self-sufficient.
3	Resident from Canty asked to explain the MTW Activities	HACG responded: HACG staff went into more detail of the current MTW Activities and how they impact the residents.

PUBLIC HEARING - TUESDAY, FEBRUARY 10, 2021

FY 2022 ANNUAL MTW PLAN

PUBLIC COMMENTS AND RESPONSES


Line	Public Comment	HACG's Response
1	Resident from The Cottages asked about getting cameras at the property.	HACG responded: We currently do have some cameras at The Cottages, but we will inform the correct department of the request for future planning.
2	Several residents called to ask what Moving to Work meant.	HACG responded: Moving to Work also known as MTW is a demonstration program that provides PHA's with the funding flexibility to use Federal dollars to help create more affordable housing, develop more efficient housing programs, and help low-income residents become self-sufficient.

PLANNED AND ONGOING EVALUATIONS

Appendix C

HACG's does not have any planned and ongoing evaluations.

DISCLOSURE OF LOBBYING ACTIVITIESApproved by OMB
0348-0046Complete this form to disclose lobbying activities pursuant to 31 U.S.C. 1352
(See reverse for public burden disclosure.)

1. Type of Federal Action: <input type="checkbox"/> a. contract <input checked="" type="checkbox"/> b. grant c. cooperative agreement d. loan e. loan guarantee f. loan insurance	2. Status of Federal Action: <input type="checkbox"/> a. bid/offer/application <input type="checkbox"/> b. initial award <input type="checkbox"/> c. post-award	3. Report Type: <input type="checkbox"/> a. initial filing <input type="checkbox"/> b. material change For Material Change Only: year _____ quarter _____ date of last report _____
4. Name and Address of Reporting Entity: <input checked="" type="checkbox"/> Prime <input type="checkbox"/> Subawardee Tier _____, if known: Congressional District, if known: 4c	5. If Reporting Entity in No. 4 is a Subawardee, Enter Name and Address of Prime: The Housing Authority of Columbus, Georgia 1000 Wynnton Road P.O. Box 630 Columbus, Georgia 31902-0630 Congressional District, if known:	
6. Federal Department/Agency:	7. Federal Program Name/Description: CFDA Number, if applicable: _____	
8. Federal Action Number, if known:	9. Award Amount, if known: \$	
10. a. Name and Address of Lobbying Registrant (if individual, last name, first name, MI):	b. Individuals Performing Services (including address if different from No. 10a) (last name, first name, MI):	
11. Information requested through this form is authorized by title 31 U.S.C. section 1352. This disclosure of lobbying activities is a material representation of fact upon which reliance was placed by the tier above when this transaction was made or entered into. This disclosure is required pursuant to 31 U.S.C. 1352. This information will be available for public inspection. Any person who fails to file the required disclosure shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.	Signature: <u></u> Print Name: <u>Lisa L. Walters</u> Title: <u>Chief Executive Officer</u> Telephone No.: <u>706-571-2800</u> Date: <u>03/17/2021</u>	
Federal Use Only:	Authorized for Local Reproduction Standard Form LLL (Rev. 7-97)	

Certification of Payments to Influence Federal Transactions

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

Applicant Name

The Housing Authority of Columbus, Georgia

Program/Activity Receiving Federal Grant Funding

Moving to Work (MTW) Demonstration Program

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

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

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

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

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

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


Name of Authorized Official

Lisa L. Walters

Title

Chief Executive Officer

Signature



Date (mm/dd/yyyy)

03/17/2021

Previous edition is obsolete

form HUD 50071 (01/14)
ref. Handbooks 7417.1, 7475.13, 7485.1, & 7485.3