

2018 ANNUAL MTW PLAN

(July 1, 2017 – June 30, 2018)

Public Comment Period:

March 2, 2017 – April 1, 2017

*The Housing Authority
of Columbus, Georgia*

SUBMITTED TO HUD: April 12, 2017

RESUBMISSION TO HUD: June 26, 2017

HUD APPROVAL: TBD

ANNUAL MOVING-TO-WORK PLAN SUBMITTED BY:

**The Housing Authority of Columbus, Georgia's
Leadership Team**

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In accordance with Moving-to-Work (**MTW**) requirements, the Housing Authority of Columbus, Georgia (**HACG**) makes its **2018 Annual MTW Plan** available to the public, from **March 2, 2017** through **April 1, 2017**, to receive comments. The document is available for review and comments at the following locations:

- The **Columbus Public Library**, 3000 Macon Road
 - 2nd floor reference desk; government documents section
- HACG's **Central Office**, 1000 Wynnton Road (front desk)
- HACG's **Tenant Selection Office**, 1180 Martin Luther King, Jr. Boulevard (front desk)
- HACG's website, www.columbushousing.org;
 - Direct comments to blamee@columbushousing.org

GLOSSARY OF ABBREVIATIONS AND ACRONYMS IN PLAN

ACOP	Admission and Continued Occupancy Plan (Public Housing)
Admin Plan	Administrative Plan (Section 8)
BoC	Board of Commissioners
CAPS	Childcare and Parent Services (program under GA Department of Early Care and Learning (DECAL))
CCG	Columbus Consolidated Government
CHAP	Commitment to enter into Housing Assistance Payment
CoC	Continuum of Care (Columbus-Muscogee/Russell County CoC)
Comp Plan	Comprehensive Plan (prepared by CCG for long-term planning)
Con plan	Consolidated Plan (prepared by CCG for CDBG and HOME funds)
CSU	Columbus State University
DBHDD	Georgia Department of Behavioral Health and Developmental Disabilities
DCA	Georgia Department of Community Affairs
DFCS	Division of Family and Children Services (under GA Department of Human Services (DHS))
EOGY	End-of-Grant-Year
EOY	End-of-Year
FMR	Fair Market Rent
FO	Field Office (HACG reports to the Atlanta Field Office)
FSS	Family Self-Sufficiency
FTE	Fulltime Equivalent
FYE	Fiscal Year End
HACG	Housing Authority of Columbus, Georgia
HCV	Housing Choice Voucher
HFA	Housing Finance Agency

GLOSSARY OF ABBREVIATIONS AND ACRONYMS IN PLAN - CONTINUED

HfG	Home for Good
HQS	Housing Quality Standards
HUD	US Department of Housing and Urban Development
IRS	Internal Revenue Service
ITSP	Individual Training and Service Plan
LAMP	Local Asset Management Plan
LIHTC	Low-Income Housing Tax Credit
LURA	Land Use Restriction Agreement
LURC	Land Use Restrictive Covenants
MOU	Memorandum of Understanding
MTW	Moving-to-Work
NNC	Neighborhood Network Center
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/Authority or Assistance
PHAS	Public Housing Assessment System
PIC	Public and Indian Housing Information Center (<i>former definition</i>) Public and Indian Housing Inventory Management System (<i>current</i>)
PIH	Public and Indian Housing
PUC	Per Unit Cost
RAB	Resident Advisory Board
RAD	Rental Assistance Demonstration
ROSS	Resident Opportunities and Self-Sufficiency
RRV	Rapid Rehousing Voucher
S8	Section 8 (<i>Housing Choice Voucher Rental Assistance Program</i>)
S9	Section 9 (<i>Public Housing Rental Assistance Program</i>)
SEMAP	Section Eight Management Assessment Program
SRO	Single-Room Occupancy
TBV	Tenant-Based Voucher
TPV	Tenant-Protection Voucher
TSO	Tenant Selection Office
TTP	Total Tenant Payment
UA	Utility Allowance
URP	Utility Reimbursement Payment
VASH	Veterans Affairs Supportive Housing
VAWA	Violence Against Women Act
VI-SPDAT	Vulnerability Index - Service Prioritization Decision Assistance Tool
VMS	Voucher Management System

I. INTRODUCTION

A. Plan Contents

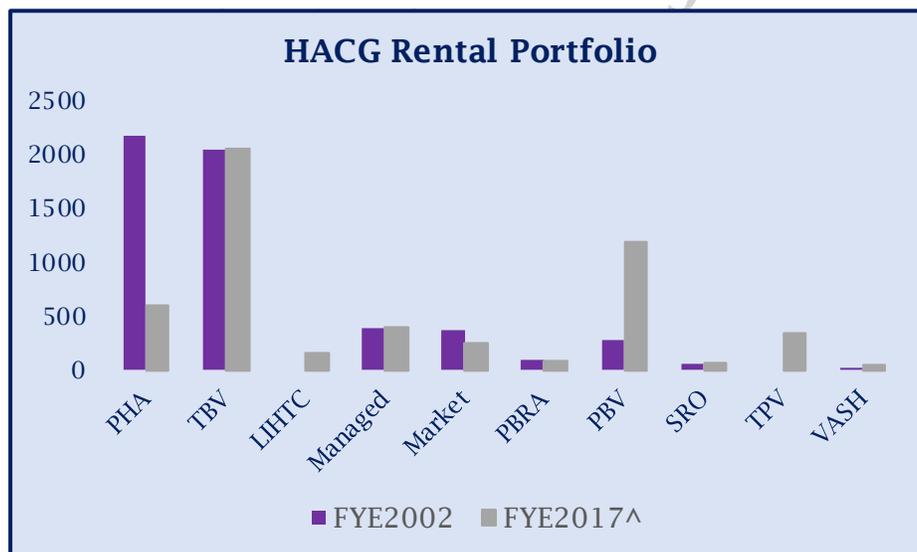
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B. Overview

The Housing Authority of Columbus, Georgia (**HACG**) is the largest provider of affordable housing units in the Columbus area. The Agency oversees almost 4,500 rental units through the administration, management, or ownership of rental assistance programs, contractual obligation, or acquisition endeavors that focus on making area market units affordable to extremely low-income, very low-income, and low-income families.

The affordable housing landscape is changing, which includes the changing of rental assistance programs. HACG has positioned itself as one of the few Public Housing Agencies/Authorities (**PHAs**) at the forefront of this changing landscape. In fact, the Agency's diversified rental portfolio embraces the changing landscape.

HACG's rental portfolio includes contract management units, conventional public housing (**PH**) units, Low-Income Housing Tax Credit (**LIHTC**) units, market-rate units, Project-Based Rental Assistance (**PBRA**) units, Project-Based Vouchers (**PBVs**), Single-Room Occupancy (**SRO**) certificates, Tenant-Based Vouchers (**TBVs**), Tenant-Protection Vouchers (**TPVs**)¹, and Veteran Affairs Supportive Housing (**VASH**) vouchers. The chart below highlights HACG's portfolio transformation by program and/or unit type in FYE2002 and then compares it to the same program and/or unit type in FYE2017:



HACG Chart 1

[^]Program/Unit Types are as of December 31, 2016

¹ Default to Agency's TBV authority after 12 months

Other programs sponsored by or supported by HACG includes the Family Self-Sufficiency (FSS) Program for both Section 8 Housing Choice Voucher (HCV) and Section 9 PH participants. HACG sponsors/supports a Homeownership Program under the Section 8 HCV and several Neighborhood Network Centers (NNCs) for resident and neighboring community access. The Agency, provides local transportation services for PH residents enrolled in job training programs and/or secondary or post-secondary school. Finally, through partnership building and promotional efforts, HACG is focused on programming efforts to create a culture of learning, stable employment, good health, and other elements that disproportionately affect low-income families in HACG communities and nationwide.

To remain at a minimum, in line with the changing affordable housing landscape, the Agency executed its strategic plan. The plan included transforming its rental-housing portfolio by repositioning and/or expanding its rental housing stock within the context of the local real estate market and the local demand for affordable housing prior to becoming a Moving-to-Work (MTW) Demonstration Program Agency. Thus, HACG has been able to creatively offer alternative, meaningful services to both its conventional PHA sites and its affordable sites scattered throughout the city while involved in the MTW Demonstration Program.

In addition to being selected to participate in the MTW Demonstration Program, HACG has been selected to participate in a few other “game changing” affordable housing industry programs. For example, the Agency received funding to create a Permanent Supportive Housing (PSH) community, given a Rental Assistance Demonstration (RAD) Program portfolio award, and has been the recipient of LIHTC funds. The RAD portfolio conversion to the Section 8 PBV platform allows HACG to utilize LIHTC and debt to layer in with conventional US Department of Housing and Urban Development (HUD) funding streams, Capital Fund Program (CFP) funding and Replacement Housing Factor (RHF) funds, which have provided HACG with flexibilities and resources to reposition and reshape its portfolio.

Internal direction, awards, and participation in both demonstration programs have helped HACG create award-winning, “first option” properties for its constituency. In addition, HACG has moved away from the “old”, conventional PHA of heavy centralized PH units, to a more modern, quasi-privatized PHA with an assortment of “globalized”, award-winning affordable rental units, management contracts, and mixed-finance, mixed-income communities. Further, HACG has provided specialized assistance to sub-population segments in Columbus that it could not have specifically helped as a conventional PHA.

Through its efforts, whether by selection to participate in a HUD Demonstration Program, acceptance of HOPE VI funding, acceptance of grant funding, or continued self-initiated, repositioning and/or expansion of its rental housing stock, HACG continues to position itself for the next opportunity.

HACG understands that the amended Cranston-Gonzalez National Affordable Housing Act discusses the expansion of the MTW Demonstration Program that includes a probable introduction of Regional MTW Agencies. To that end, should HUD establish Regional MTW PHAs, HACG stands committed to the MTW Demonstration Program and **is very interested in becoming a Regional MTW Agency** for the Chattahoochee River Valley Area of Alabama and Georgia.

As the Agency continues to pursue innovative ideas and strategies that will maximize its affordable housing offerings, the Agency will also continue to seek to align itself with community partners and programs that will positively affect the life experiences of clients and residents participating in its programs.

The Long-Term Goals and Objectives timeline remains in line with the guidance outlined in HUD Form 50900. The diversity of HACG's housing stock portfolio and rental assistance programs requires a delineation between MTW and non-MTW activities, with the understanding that some MTW and non-MTW goals may cross over into other MTW and non-MTW goals as rules and regulations allow.

MTW SHORT-TERM GOALS AND OBJECTIVES

HACG's MTW Goals and Objectives over the next 12 months include providing administration in the monitoring of MTW Activities, and implementing newly approved MTW activities:

Goal:

Implement cost effectiveness strategies during FYE2018 campaign

Objectives to implement cost effectiveness strategies:

- ✓ Propose new MTW Initiative to **eliminate/reduce interim examinations**
 - ❖ Set-up details of activity, educate existing program clients/residents, establish/finalize activity baseline, and similar preparatory activities
 - ❖ Implement activity, upon approval, for new residents
 - ❖ Fully **implement initiative**, program-wide, in **second half of FYE2018**

Goal:

Implement housing expansion choice strategies during FYE2018 campaign

Objectives to implement housing expansion choice strategies:

- ✓ Propose new MTW Initiative to **expand housing choices by over-housing 1-bedroom eligible families at designated sites²**, while providing gap payment assistance until an appropriate-sized unit becomes available
 - ❖ Set-up details of new activity and similar preparatory activities
 - ❖ Fully **implement initiative during FYE2018**
- ✓ Prepare for the initial wave of eligible PBV families under the **Alternative Mobility** policy (PIH Notice 2012-32 (HA), REV 2)
 - ❖ Identify, during first half of FYE2018, **Wait List management** process responsibility, and similar preparatory activities
 - ❖ Create/set-up **Wait List** during first half of FYE2018 to meet split:
 - **75% of TBV turnover allocated to the RAD PBV Wait List**
 - **25% of TBV turnover allocated to the MTW TBV Wait List**
- ✓ Analyze feasibility of changing Wait List process because HACG will manage seven distinct Wait Lists, which are all date and time stamp
 - ❖ Consideration of pros and cons to creating preferred, random selection, hybrids, and other Wait Lists to promote efficiency and/or fairness
- ✓ Initiate steps to recruit property owners in areas of low-poverty, high-opportunity to develop partnerships to project-base MTW Section 8 assistance at their market rate properties to support redevelopment plans for HACG's RAD portfolio conversion activities

Goal:

Close-out MTW Activities made obsolete by Public and Indian Housing (PIH) Notice 2016-05 (HA), use of LIHTC funding, and/or no longer in line with HACG's current and/or future goals

Objectives to closing-out MTW Activities:

- ✓ Initiate **close out** steps for *PH component of* MTW Activity **2014.03 Administrative Reforms** (sets asset threshold at \$50,000)
 - ❖ Return asset threshold to \$5,000 for PH units and RAD PBV units³
 - ❖ **Assess feasibility** of adopting the utilization of **Attachment F** of PIH Notice 2016-05 (HA) for PH units and RAD PBV units
 - ❖ **Retain TBV and non-RAD PBV elements** of activity as designed
- ✓ Initiate **close out** steps for *PH component of* MTW Activity **2014.04 Administrative Efficiencies** (establishes triennial re-certification cycle)
 - ❖ Return PH units and RAD PBV units to annual certification cycles

²Designated sites to be determined, based on need

³ RAD PBV units are LIHTC units, which are impacted by IRS Section 42

- ❖ **Assess feasibility** of adopting the utilization of **Attachment D** of PIH Notice 2016-05 (HA) for PH units and RAD PBV units
- ❖ **Modify TBV and non-RAD PBV elements** of activity for consistency
- ✓ Initiate **close out** steps for MTW Initiative **2014.05 Streamline Housing Quality Standard (HQS) Inspections**, (establishes biennial inspection cycle and assesses a re-inspection fee)
 - ❖ **Adopt the utilization of Attachment K** of PIH Notice 2016-05 (HA) that allows biennial inspections and an alternate inspection method
 - ❖ **Adopt the utilization of Attachment L** of PIH Notice 2016-05 (HA) that allows the collection of re-inspection fees; treated as an unrestricted fee
- ✓ Initiate **close out** process for MTW Initiative **2015.01 Eliminate Child Support Income from the Rent Calculation**
 - ❖ Have PH site managers and RAD PBV site managers calculate all income sources for PH and RAD PBV households to meet LIHTC requirements

Goal:

Continue the administration, monitoring, and data collection of approved, ongoing MTW Activities

Objectives to continue the administration, monitoring, and data collection:

- ✓ Utilize approved MTW Authorizations of the Amended and Restated MTW Agreement to apply approved waivers for ongoing MTW Initiatives:
 - ❖ **2014.01 – Community Choice**, *approved FYE2015*
 - ❖ **2014.02 – Innovations to Reduce Homelessness**
 - ❖ **2014.03 – Administrative Reforms**, *TBV and Some PBV elements only*
 - ❖ **2014.04 – Administrative Efficiency**, *TBV and Some PBV elements only*
 - ❖ **2014.06 – Rent Reform (Farley)**
 - ❖ **2015.02 – Portability Restrictions**
 - ❖ **2015.03 – Simplify Utility Allowance (UA) Calculations**
 - ❖ **2015.04 – Cap Childcare Dependent Deductions**
 - ❖ **2016.01 – Next Step Voucher (NSV)**, *Pending implementation*
 - ❖ **2016.02 – Non-Competitive Project-Basing Process**
 - ❖ **2016.03 – Project-Basing Flexibilities**

Goal:

Strengthen MTW evaluator agreement and improve deliverables

Objectives to strengthen MTW evaluator relationship and deliverables:

- ✓ Continue third-party evaluative relationship with Columbus State University (CSU)
 - ❖ Extend invitations to MTW Conference and related meetings
 - ❖ Finalize modification of existing agreement to add another activity
 - Request CSU to expand its evaluation capacity to includes NSVs

- ❖ Review and evaluate deliverables for improvement
 - Social and recreational programs
 - On-site enrichment classes
 - On-site health classes
 - Other services as approved by GDCA
- ❖ **Must have** at least **4 services** from 2 categories **for senior sites**
 - Social and recreational events
 - On-site enrichment classes
 - On-site health classes
 - Other services as approved by GDCA
- ✓ Plan **phase-in implementation** to get **Supportive Services to 100%**
 - ❖ Increase limited supportive services at family and senior sites under RAD I Rehabilitation Projects **as rehabilitation work is completed**
 - Family and senior **RAD I Projects include** Farley Homes, Knight Gardens, Knight Senior, Nicholson Terrace, and Wilson Homes
 - ❖ Plan **limited, introductory Supportive Services** at family and senior property that remain under HACG's rehabilitation, conversion portfolio
 - Remaining family and senior sites planned for rehabilitation work and/or conversion include Canty Homes, Rivers Homes, and Williams Homes
- ✓ **Determine** Supportive Services **staffing level** under GDCA's 2016 Qualified Allocation Plan
 - ❖ Analyze need for Fulltime Equivalent (FTE) and/or, Part-Time Activities Manager based on site size and programming planned
 - ❖ **Assess need for temporary staffing** during lease-up to handle set-up and sign-up activities - **considered on a case-by-case basis by GDCA**
- ✓ Prepare **Supportive Services Programming at Columbus Commons** (projected completion: August 2017)

NON-MTW SHORT-TERM GOALS AND OBJECTIVES

HACG's Non-MTW Goals and Objectives over the next 12 months include changing its fiscal year format, while continuing to implement and manage non-MTW activities as its business focus and model continues to evolve.

Goal:

Position Agency to meet various program timing guidelines

Objectives to position Agency to meet various program timing guidelines:

- ✓ **Seek approval to change** Agency's **fiscal year** format from its current July 1 - June 30 format **to** a calendar year fiscal year format of **January 1 - December 31**
- ✓ **Continue** receipt of "**unqualified opinion**" from external **audits**

- ✓ **Continue** complete **background checks** for clients and residents at each annual certification examination
- ✓ **Continue** implementation of Flat Rent Mandate – continue process of annually **setting flat rents at 80% FMR**
- ✓ Provide tools to Asset Manager position to **ensure RAD PBV units using LIHTC funding meet RAD and LIHTC requirements** respectively
- ✓ **Continue converting portfolio** of PH units to long-term, Section 8 assisted PBV units **under the RAD Program**
- ✓ **Submit LIHTC application(s)** for remaining RAD portfolio award⁴:
 - ❖ Canty Homes – *full RAD conversion (249 units)*
 - ❖ Chase Homes – *full RAD conversion (108) with replacement plan*
 - ❖ Rivers Homes – *full RAD conversion (24)*
 - ❖ Williams Homes – *full RAD conversion (160)*
- ✓ **Initiate close out procedures** for **RAD I Rehabilitation Projects**. Contractual construction completion for rehabilitation work is **April 28, 2018**; however, **HACG anticipates early completion** of the projects:
 - ❖ Knight Family, 52 units, *projected completion is June 2017*
 - ❖ Knight Senior, 40 units, *projected completion is June 2017*
 - ❖ Nicholson Terrace, 100 units, *projected completion is July 2017*
 - ❖ Farley Homes, 102 units, *projected completion is December 2017*
 - ❖ Wilson Homes, 289 units, *projected completion is December 2017*
- ✓ **Continue preparation** for remaining **RAD Rehabilitation Projects**. Anticipated rehabilitation work to current PH sites *may include*:
 - ❖ Canty and Williams Homes at a cost of **approximately \$40,000 per unit**
 - The use of **MTW Block Grant funds is required** for this plan
 - Funds would be *available during construction period*
 - ❖ **Demolition and Redevelopment of Chase Homes** (108 units)
 - Plan to **redevelop up to 60 units** in planned City Village area
 - ✚ *Request City of Columbus to provide land for new units* (if replacement units are not constructed on the same Chase site)
 - Request **Community Development Block Grant (CDBG)** funds (under City of Columbus' control) **to demolish Chase**
 - The use of **MTW Block Grant funds is required** for this plan
 - ✚ *Funds would be accumulated annually* (full total by FYE2022)
 - ❖ Finalize **replacement plan for 48+/- remaining units** not developed
 - Initial replacement plans include a **proposed transfer of assistance for the remaining Chase units** to private property owners city-wide with an emphasis on project-basing vouchers **in areas of high opportunity**
- ✓ Incorporate **best practices and lessons learned to improve relocation process** for the remaining RAD Rehabilitation Projects⁵

⁴ Listed in alpha order

⁵ Relocation of residents will be determined by LIHTC and similar funding application approval(s)

- ✓ **Initiate close out procedures** for Booker T. Washington (BTW)-Chapman Phase II⁶ Redevelopment, which will be known as Columbus Commons, (projected completion: August 2017)
 - ❖ Fully-involved lease-up process is planned for September 2017
 - Ensure property is compliant with the Olmstead Settlement Agreement dated October 29, 2010

Goal:

Meet Requirements of Smoke-Free Multifamily Housing rule

Objectives to meet requirements of Smoke-Free Multifamily Housing rule:

- ✓ Initiate steps to develop education and enforcement strategies for HACG clients, employees, and residents
 - ❖ Design implementation strategy to become effective within 18-months after the effective date of the final rule.

MTW Long-Term Goals and Objectives

HACG's MTW Goals and Objectives include the continued administration, development, and implementation of MTW Initiatives designed to maximize cost effectiveness, promote self-sufficiency, and expand housing choices:

Goal:

Research, Develop, and Design initiatives that meet Statutory Objectives and HACG stated management plan and goals

Objectives to design initiatives to meet Statutory Objectives:

- ✓ **Propose/re-propose new/existing MTW Initiatives** to meet Agency's service delivery commitments, which may include:
 - ❖ Introducing a **MTW Initiative for HACG's workforce housing concept**
 - Construct or renovate existing structure for this endeavor
 - ❖ Introducing a **MTW Initiative that addresses term and/or time limits**
 - May exclude specific population segments and/or age ranges
- ✓ **Analyze and assess continued/future need for targeted vouchers** to address specific population segments that are either, overlooked or disparately impacted by conventional rental assistance rules and regulations. Initial ideas include:
 - ❖ *Development of Emergency Housing; Minor Disaster Vouchers*
 - ❖ *Different calculations for elderly and/or employed families*
 - ❖ *Increase minimum rent across all rental assistance programs*
 - ❖ *Increase MTW Rapid Rehousing Vouchers and/or Next Step Vouchers*
 - ❖ *Introduction of educational, employment, and similar incentives*

⁶ BTW-Chapman Phase I and Ia Redevelopment included the demolition of Alvah Chapman Homes and the construction of Patriot Pointe on the same site respectively, as well as partial demolition of the BTW site

- ❖ *Limitations in term and/or time of rental assistance*
- ❖ *Non-traditional custodial parents (e.g., aunts, fathers, grands, uncles)*
- ❖ *Resident “graduation” to market rate property and/or homeownership*
- ❖ *Re-entry community in partnership with non-profit organization*
- ✓ **Monitor rules and regulation changes** to close out obsolete initiatives in respect to HACG’s goals and objectives
- ✓ **Evaluate and assess deliverables agreement with CSU, HACG’s MTW Initiative third-party evaluator**

Goal:

Become designated as a Regional MTW Agency

Objectives to achieve designation as a Regional MTW Agency:

- ✓ Continue to **position Agency to be competitive in a designation selection process should a Regional MTW Agency designation become available** beyond the coverage period of this Plan (coverage period 18 months)
- ✓ Analyze and evaluate Agency’s envisioned business model in relationship to its participation in the MTW and RAD Programs
 - ❖ Implement measures to ensure current and new staff grow with Agency and understand business model changes and concepts

Non-MTW Long-Term Goals and Objectives

Non-MTW Goals and Objectives include the continuation to administer, develop, and take advantage of activities aimed at improving its service delivery process and rental inventory options.

Goal:

Oversee an effective Supportive Services Program

Objectives to overseeing an effective Supportive Services Program:

- ✓ **Assess and evaluate established Supportive Services Program**
 - ❖ Review emphasis of designed Supportive Services Programming
 - ❖ Review effectiveness of developed Supportive Services curriculum
 - ❖ Improve Supportive Services Program to ensure programming delivery is met at family and senior sites:
 - Social and recreational events
 - Onsite “growth” classes
 - Onsite health classes
 - Other services as approved by DCA

Goal:

Position Agency to meet various program timing guidelines

Objectives to position Agency to meet various program timing guidelines:

- ✓ **Change** Agency's **fiscal year** format from July 1 - June 30 **to** a calendar year fiscal year format of **January 1 - December 31**

Goal:

Expand rental housing portfolio

Objectives to expand rental housing portfolio:

- ✓ Assess and analyze the **next phase(s) of modernization work**, site redevelopment, or **new construction** on existing or vacant parcels
- ✓ Through use of best practices and lessons learned, **improve conversion process and relocation strategies**
- ✓ Actively **seek acquisition of or develop plans to construct a structure supportive of mixed-use** rentals (e.g., market-rate, PBVs, VASH) or similar
- ✓ Actively **seek acquisition of or develop construction plans for an apartment building/complex for HACG's workforce housing** initiative
- ✓ Upon partnership approval, file RAD applications for PH units at Patriot Pointe and Columbus Commons included in its amended Portfolio Award.

*The Housing Authority
of Columbus, Georgia*

II. GENERAL HOUSING AUTHORITY OPERATING INFORMATION

A. Housing Stock Information

A. MTW Plan: Housing Stock Information											
Planned New Public Housing Units to be Added During the Fiscal Year											
AMP Name and Number	Bedroom Size							Total Units	Population Type *	# of UFAS Units	
	0	1	2	3	4	5	6+			Fully Accessible	Adaptable
GA 004000424 Columbus Commons	0	6	19	6	0	0	0	31	General	6	0
	0	0	0	0	0	0	0	X	Type Noted *		
	0	0	0	0	0	0	0	X	Type Noted *		
	0	0	0	0	0	0	0	X	Type Noted *		
Total Public Housing Units to be Added								31			
* Select Population Type from: Elderly, Disabled, General, Elderly/Disabled, Other											
If Other, please describe: N/A											
Planned Public Housing Units to be Removed During the Fiscal Year											
PIC Dev. # / AMP and PIC Dev. Name	Number of Units to be Removed		Explanation for Removal								
GA 004000405 Warren Williams	181		Public Housing (PH) units planned for removal from the PH stock are planned to be converted to long-term Project-Based Voucher (PBV) Section 8 assisted units under the Rental Assistance Demonstration (RAD) Program								
GA 004000408 Elizabeth Cnty	248		Public Housing (PH) units planned for removal from the PH stock are planned to be converted to long-term Project-Based Voucher (PBV) Section 8 assisted units under the Rental Assistance Demonstration (RAD) Program								
Total Number of Units to be Removed		429									

The table on the next page identifies the Housing Authority of Columbus, Georgia's (HACG's) remaining public housing units and the preliminary plans proposed for those units:

REMAINING / EXISTING PUBLIC HOUSING UNITS*				
PIC Dev. #	PIC Dev. Name	Housing Type	Total Units	Preliminary Plans
GA 004000407	Louis Chase	Family	108	Site is planned for redevelopment, which includes demolition of the 108-unit site, construction of affordable units on the same site, and implementation of a replacement plan for the remaining units not constructed on the site
GA 004000423	Patriot Pointe	"Near"-Elderly	24	HACG's Portfolio Award was amended June 9, 2014 to include these units. Because these units were added during the conversion planning process, HACG will complete a RAD application <i>after</i> it completes its <i>current conversion plans</i> . At a <i>later date</i> will HACG seek to <i>convert these PH units</i> to PBV units under the RAD Program
GA 004000424	Columbus Commons	Family	31	HACG's Portfolio Award was amended June 9, 2014 to include these units. Because these units were added during the conversion planning process, HACG will complete a RAD application <i>after</i> it complete its <i>current conversion plans</i> . At a <i>later date</i> will HACG seek to <i>convert these PH units</i> to PBV units under the RAD Program

HACG Chart 2

*Information based on current RAD I Projects and projected RAD II Projects

HACG's new Project-Based Vouchers (PBVs) count is detailed below:

New Housing Choice Vouchers to be Project-Based During the Fiscal Year		
Property Name	Anticipated Number of New Vouchers to be Project-Based *	Description of Project
Elizabeth Canty / E. Canty - Addition	248	HACG plans to convert these public housing units to long-term, Section 8 assisted PBV units under the Rental Assistance Demonstration Program
Warren Williams	157	HACG plans to convert these public housing units to long-term, Section 8 assisted PBV units under the Rental Assistance Demonstration Program
George Rivers	24	HACG plans to convert these public housing units to long-term, Section 8 assisted PBV units under the Rental Assistance Demonstration Program
Anticipated Total New Vouchers to be Project-Based	429	Anticipated Total Number of Project-Based Vouchers Committed at the End of the Fiscal Year 1492 Anticipated Total Number of Project-Based Vouchers Leased Up or Issued to a Potential Tenant at the End of the Fiscal Year 1492

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

The table on the next page details HACG's new PBV housing stock because of the Public Housing (PH) unit conversions planned under the Rental Assistance Demonstration (RAD) Program:

NEW HCV PROJECT-BASED VOUCHER (PBV)* DETAILS									
PIC Dev. #	PIC Dev. Name	Housing Type	Total Units	0 BR	1 BR	2 BR	3 BR	4 BR	5 BR
GA 004000405	Warren Williams^	Family	157	0	6	102	39	0	0
	George Rivers	Elderly	24	0	24	0	0	0	0
GA 004000408	Elizabeth Canty^	Family	152	0	25	83	36	6	2
	Elizabeth Canty - Addition	Family	96	0	16	42	34	4	0
Total New Project-Based Housing Stock:			429	0	71	227	109	10	2

HACG Chart 3

*Information based on planned RAD II Projects

^Excludes special use units, which are units taken off-line and purposed for use such as Kids Cafe, Computer Labs, etc. . .

Other Changes to the Housing Stock Anticipated During the Fiscal Year
<p>HACG anticipates a rhythmic exchange of units between the Contractor and HACG, where units will be taken off-line for modernization work and then put back on-line once the work is completed during FYE2018. Therefore, residents will be temporarily relocated and moved back in during this second phase of its RAD conversion activities.</p>
<p>HACG anticipates moving forward with the creation of an affordable PBV housing community designed to house homeless families and veterans. Feasibility study results will guide HACG's actions, in the form of property acquisition or partnership development, during the fiscal year in order to accommodate the targeted population group utilizing MTW RRVs and/or VASH vouchers.</p>
<p>HACG anticipates continuing to prepare for the possibility of acquiring property or entering into a partnership agreement during FYE2018 to create a workforce housing community.</p>
<p>Examples of the types of other changes can include but are not limited to units that are held off-line due to the relocation of residents, units that are off-line due to substantial rehabilitation and potential plans for acquiring units.</p>
General Description of All Planned Capital Fund Expenditures During the Plan Year
<p>CFP Funds of approx. \$3.1M will be expended primarily on the following projects during FYE2018: completion of BTW Redev. II (a.k.a. Cols Commons) Project, completion of HACG's RAD I Phase Rehab. Projects (Farley, Knight, Nicholson, and Wilson), and initiation of HACG's RAD II Phase Rehab. Projects (Canty, Rivers/Williams). Expenditures for planned projects during FYE2018 may include costs associated with the total redev. of BTW including other reasonable and necessary costs required to complete the redev. of BTW. Expenditure plans may also include S8 landlord payments other costs related to converting conv. PH units under the RAD Program, and/or specialty consulting services, environmental testing, survey and legal work, and other activities necessary to complete and/or initiate the RAD portfolio conversion. Finally, CFP planned expenditures include phys. improvements, mgmt improvements, Agency-wide non-dwelling structures and equip., admin., operations, fees and cost, as well as preventative and routine maintenance to all agency dwelling structures and equip., minor pre & post construction cost for preliminary and existing project plans.</p>

B. Leasing Information

B. MTW Plan: Leasing Information		
Planned Number of Households Served at the End of the Fiscal Year		
MTW Households to be Served Through:	Planned Number of Households to be Served*	Planned Number of Unit Months Occupied/Leased***
Federal MTW Public Housing Units to be Leased	576	6,914
Federal MTW Voucher (HCV) Units to be Utilized	3,416	40,995
Number of Units to be Occupied/Leased through Local, Non-Traditional, MTW Funded, Property-Based Assistance Programs **	X	X
Number of Units to be Occupied/Leased through Local, Non-Traditional, MTW Funded, Tenant-Based Assistance Programs **	X	X
Total Households Projected to be Served	3,992	47,910
<p>* Calculated by dividing the planned number of unit months occupied/leased by 12.</p> <p>** In instances when a local, non-traditional program provides a certain subsidy level but does not specify a number of units/households to be served, the PHA should estimate the number of households to be served.</p> <p>***Unit Months Occupied/Leased is the total number of months the PHA has leased/occupied units, according to unit category during the fiscal year.</p>		
Reporting Compliance with Statutory MTW Requirements		
<p>If the PHA has been out of compliance with any of the required statutory MTW requirements listed in Section II(C) of the Standard MTW Agreement, the PHA will provide a narrative discussion and a plan as to how it will return to compliance. If the PHA is currently in compliance, no discussion or reporting is necessary.</p>		
N/A		
Description of any Anticipated Issues Related to Leasing of Public Housing, Housing Choice Vouchers and/or Local, Non-Traditional Units and Possible Solutions		
Housing Program	Description of Anticipated Leasing Issues and Possible Solutions	
Housing Choice Vouchers	<p>Anticipated leasing issues include families not returning to converted units. Conversion of units under RAD will require the relocation of families while units undergo rehabilitation work to meet RAD/LIHTC requirements. <u>Solutions may include a reliance on lessons learned and an intentional focus on new admissions and transfer families</u></p>	
Public Housing	<p>As a result of RAD conversions, there will be a number of units that will be on and off-line attributed to rhythmic exchange of units between HACG and RAD Contractors. This unit exchange requires residents to be relocated to complete the modernization work. The relocation efforts may cause minor "re-leasing" issues that will be addressed as residents move into the renovated units. Possible solutions include upfront education about the "re-leasing" process, as well as on-site and off-site transfers</p>	

Although HACG continues the process of converting its PH units to long-term, Section 8 assisted PBV units under the RAD Program, HACG cautiously plans for 100% Federal MTW PH Units in its FYE2018 portfolio. Nonetheless, HACG remains hopeful for an expedited conversion process for PH units planned to be converted during FYE2018.

C. Wait List Information

C. MTW Plan: Wait List Information				
Wait List Information Projected for the Beginning of the Fiscal Year				
Housing Program(s) *	Wait List Type**	Number of Households on Wait List	Wait List Open, Partially Open or Closed***	Are There Plans to Open the Wait List During the Fiscal Year
Federal MTW Housing Choice Vouchers	Community-Wide	1234	Closed	No
MTW Rapid Rehousing Vouchers; MTW Next Step Vouchers	Program Specific	10	Partially Open	Yes
Federal MTW Public Housing Units; Converted PH Units to RAD Project-Based Vouchers	Merged	3446	Open	Yes

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

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

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

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

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

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

N/A
N/A
N/A

If Other Wait List Type, please describe:	
	N/A
	N/A
	N/A
If there are any changes to the organizational structure of the wait list or policy changes regarding the wait list, provide a narrative detailing these changes.	
Because of RAD conversions, HACG manages and/or administers seven distinct Wait Lists. The seven date and time stamp Wait Lists are consolidated lists and the Agency may consider a preferential, random selection, or hybrid Wait List during FYE2018 to address process efficiency. Meanwhile, HACG introduces the Alternative Mobility Wait List for RAD PBV families, where 75% of TBV turnover is earmarked to RAD PBV families expressing mobility and the remaining portion are dedicated to TBV Wait List families	

The Agency's PBV units, including PH units converted to long-term, Section 8 assisted PBV units under the RAD Program, will exceed 20% of HACG's authorized Housing Choice Voucher (HCV) Annual Contributions Contract (ACC). Because of this conversion impact, HACG adopted⁷ the Alternative Mobility policy offered in PIH Notice 2012-32 (HA), REV 2 (RAD Notice)

Under this policy, HACG established an inventory cap in its Administrative Plan (**Admin Plan**), where three-quarters of its turnover vouchers will be applied to RAD PBV Wait Lists. RAD PBV Wait Lists *may* include PBV Wait Lists at Arbor Pointe, Ashley Station, Columbus Commons, Patriot Pointe, RAD PBV sites, and future PBV related sites to orderly track and manage RAD PBV turnover families wishing to exercise mobility. This structure meets HACG's Choice-Mobility obligation under the RAD Notice with HUD's Office of Recapitalization.

Currently⁸, HACG's Tenant Selection Office (TSO) estimates that 25 Tenant-Based Vouchers (TBVs) turnover each month. Using this estimate as an example under the Alternative Mobility Policy, 75% (~19) of the turnover will go to RAD PBV families. The remaining 6 (~25%) will go to TBV Wait List families.

Based on the above-mentioned estimate and factoring in the following information, 1) the Wait List contained less than a year's worth of names, 2) the office anticipates that many RAD PBV families will express a desire to exercise their mobility options once the family meets the 12-month lease requirement, and 3) the office will implement the Alternative Mobility policy during FYE2018, TSO opened the HCV Wait List for one week during FYE2017. During the time frame in which the list was opened, TSO received 990 applications.

⁷ Includes modification of HACG's Admin Plan that includes its decision to adopt the Alternative Mobility Policy

⁸ As of December 31, 2016

Using TSO’s estimates of 25 turnover vouchers each month, HACG compares the Wait List times between the former Wait List method and the Alternative Wait List method below. The comparison factors the following:

1. Maintenance of two distinct Wait Lists - HCV TBV and RAD PBV
 - a. Former Wait List (**old method**) would receive all 25 turnover vouchers
 - b. The 25 turnover vouchers are split between the two Wait Lists under the **alternative method** (alt. method)
2. Comparison assumes that **none of the 147 FYE2017 families remain on the Wait List** at the start of HACG’s new fiscal year, July 1, 2017
 - a. Assumption anticipates any of the following scenarios: exhausted issuance (25 x 6 = 150) **OR** combination of issuance and list purge (family disinterest and/or inability to contact family)
3. Comparison assumes **100% of the 990 new families** received during the open period **are on the list** at the start of the new year

HOUSING CHOICE VOUCHER WAIT LIST IMPACT ANALYSIS			
Category	HCV TBV Wait List (old method)	HCV TBV Wait List (alt. method)	RAD PBV Wait List (alt. method)
Wait List Count*	990		
Voucher Turnover* (Monthly Estimate)	25	6	19
Wait List Time (Approximate Years)	3.3	13.2	4.4
Percent Increase/(Decrease)	0.0%	400.0%	133.3%

HACG Chart 4

*Data source: HACG's TSO Department

Analysis suggests that TBV families wait time increases 400%, from 3-years to 13-years. Also, analysis suggests that RAD PBV families wait time will increase by one-year, from a 3 year wait to a 4-year wait, on the RAD PBV Wait List than they would have had to wait under the old method as a PH resident.

III. PROPOSED MTW ACTIVITIES: HUD APPROVAL REQUESTED

2018.01 - ELIMINATE / REDUCE INTERIM CERTIFICATION EXAMINATIONS

A. DESCRIPTION OF PROPOSED MTW ACTIVITY

HACG staff spends a great deal of time performing intake and annual certification examinations each year. Under current US Department of Housing and Urban Development (HUD) rules and regulations program participants have 10-days to report changes in their family composition and/or household income. So, between child births, marriages, divorces, adult children moving out, grand-children moving in, and similar family changes, as well as income gains and losses, HACG staff may spend an extraordinary amount of time performing interim certification examinations on program participants.

Further, under HUD rules and regulations, program participants' rent portion is reduced whenever their income is lost, which increases the subsidy amount from Public Housing Authorities (PHAs). However, under these same rules and regulations, a family's rent portion remains the same when income increases, as HACG only increases rent annually.

The Housing Authority of Columbus, Georgia (HACG) intends 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 an intake and/or annual certification examination.

Performing an interim certification examination can be burdensome, counter-productive, and time consuming to staff since staff performs a lot of changes during a 12-month period. This sentiment among staff is especially accurate when interim certification examinations are conducted shortly after an intake and/or annual certification examination was completed. HACG staff have determined that the most common interim certification examination performed often includes the loss of income. Usually, this is the same household income that was reported to establish program eligibility and/or increase rent share.

Under current rules and regulations, the ability to report a loss of income shortly after reporting income, does not prepare the program participant for "graduation" to market-rate property. HACG desires to prepare its program participants, as much as possible, for life after rental assistance. Therefore,

HACG seeks to eliminate, or at the very least reduce the number of, interim certification examinations once an intake and/or annual certification examination is completed.

Nonetheless, HACG recognizes the purpose of and the need for an interim certification examination. HACG also realizes that program participants lose jobs after receiving notification of their rent share and/or report Contribution Income to qualify for a unit above their means. Losing income sources is financially unhealthy. Contribution Income proves to be an unpredictable, unstable income source for either HACG or the program participant to rely upon.

Therefore, HACG will continue to **calculate Contribution Income at 100%** even though this type of income fluctuates, presents a low-confidence of receipt, and increases processing time; however, through the proposal and subsequent approval of this activity, HACG will utilize **MTW Authorizations, C.4 and D.1.c** of the Amended and Restated MTW Agreement to accomplish the following activities:

- **Eliminate interim** certification examinations **on Contribution Income**. Program participants that report contribution income **cannot report a loss of contribution income for 12 months**.
 - HACG will calculate Contribution Income, as reported, for the next 12 months at each annual certification examination,
- **Limit** program participants to **1 interim** certification examination **annually** for all other income related adjustments
 - Family composition changes must continue to be reported
 - Family changes will be noted; will not involve a “full interim exam”

HACG lists hardship case criteria under item L of this activity. Hardship requests will be addressed on a case-by-case basis by HACG in accordance with item L.

B. DESCRIBE HOW ACTIVITY WILL ACHIEVE ONE OR MORE OF THE STATUTORY OBJECTIVES:

The process of performing an interim certification examination for a recently certified (intake/annual) program participant is burdensome, counter-productive, and time-consuming. Through this activity, HACG will reduce staff burden and similar which **will achieve Cost Savings for the Agency**.

C. IDENTIFY AND DISCUSS THE ANTICIPATED IMPACT OF ACTIVITY ON STATED OBJECTIVES:

HACG identifies approximately 574⁹ **program participants** reporting contribution income. With the elimination and/or reduction of interim certification examinations, HACG estimates a **potential cost savings of \$7,4315** in FYE2018.

D. ANTICIPATED SCHEDULES FOR ACHIEVING THE STATED OBJECTIVES:

HACG anticipates using the first 6 months of FYE2018 to update its Administrative Plan (**Admin Plan**), conduct education and information campaigns, through marketing, program orientations, and at certification examination interviews, and collect baseline data. Since HACG plans to change its fiscal year format, **HACG anticipates implementing this activity** with annual certifications at the beginning of the new fiscal year, **January 1, 2018**.

E. STANDARD HUD METRICS THAT HACG ANTICIPATES AS A RESULT OF ACTIVITY:

HACG anticipates the following Standard HUD Metrics for this activity

- Cost Effectiveness #1 - Agency Cost Savings
- Cost Effectiveness #2 - Staff Time Savings
- Cost Effectiveness #5 - Increase in Agency Rental Revenue

F. BASELINE PERFORMANCE LEVEL FOR EACH METRIC (NUMERIC VALUE) PRIOR TO IMPLEMENTATION OF MTW ACTIVITY:

<i>CE #1: Agency Cost Savings</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	Cost of task prior to implementation of the activity (in dollars).	Expected cost of task after implementation of the activity (in dollars).	Actual cost of task after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
	\$ 21,143.15	\$ 7,415.07	TBD	TBD

⁹ Other Income Source category; count as of December 31, 2016

CE #2: Staff Time Savings				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	Total amount of staff time dedicated to the task prior to implementation of the activity (hours)	Expected amount of total staff time dedicated to the task after implementation of the activity (in hours)	Actual amount of total staff time dedicated to the task after implementation of the activity (in hours)	Whether the outcome meets or exceeds the benchmark.
	746.6	723.8	TBD	TBD

CE #5: Increase in Agency Rental Revenue				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Rental revenue in dollars (increase).	Rental revenue prior to implementation of the activity (in dollars).	Expected rental revenue after implementation of the activity (in dollars).	Actual rental revenue after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
	\$ 565,436.47	\$ 688,929.48	TBD	TBD

G. GIVE THE YEARLY BENCHMARKS FOR EACH METRIC (A NUMERIC VALUE):

Annual Benchmark						
Unit of Measurement	Baseline FYE2017*	FYE2018	FYE2019	FYE2020	FYE2021	FYE2022
Total cost of task in dollars (decrease).	\$ 21,143.15	\$ 7,415.07	\$ 14,822.73	\$ 14,815.32	\$ 14,807.91	\$ 14,800.51
Total time to complete the task in staff hours (decrease).	746.6	723.8	1446.9	1446.2	1445.4	1444.7
Rental revenue in dollars (increase).	\$ 565,436.47	\$ 688,929.48	\$ 1,384,748.25	\$ 1,391,672.00	\$ 1,398,630.36	\$ 1,405,623.51

**Estimated. Final baseline is reported in the Annual MTW Report*

H. DESCRIBE THE FINAL PROJECTED OUTCOME(S) OF THE MTW ACTIVITY FOR EACH METRIC:

The final projected outcome for the MTW Activity for each metric in the table under item G will be captured in HACG's 2018 Annual MTW Report.

I. GIVE THE DATA SOURCE FROM WHICH METRIC DATA WILL BE COMPILED:

HACG will use data reported in its client tracking software supplemented by interview notes collected by and reported to HACG Occupancy Specialists and Property/Site Managers during any certification examination.

J. CITE THE AUTHORIZATION(S) THAT GIVE THE FLEXIBILITY TO CONDUCT THE ACTIVITY:

Authorization C.4 allows HACG to restructure the initial, annual, and interim review process for Public Housing related units.

Authorization D.1.c allows HACG to adopt a reexamination program for Housing Choice Voucher related units



K. EXPLAIN WHY THE CITED AUTHORIZATION(S) IS/ARE NEEDED TO ENGAGE IN THIS ACTIVITY

HACG requests the authorizations to eliminate interim certification examinations on the loss of contribution income and to limit the number of interim certification examinations performed in a 12-month period to one for all other family composition and income source changes.

Under current rules and regulations, HACG is unable to establish a limited number of interim certification examinations in a 12-month period, especially for volatile income sources.

L. ADDITIONAL INFORMATION FOR RENT REFORM ACTIVITIES

IMPACT ANALYSIS

1. Description of Rent Reform Activity

The activity eliminates Interim Certification Examinations (interims) for 12-months for families that *only* report Contribution Income. Therefore, families citing *only* Contribution Income will not see their rent share decrease when Contribution Income is lost.

When families report Contribution Income during the eligibility examination (new or recertification) and loses the income during the same eligibility period, then the family remains responsible for their share of the rent for the remaining portion of the certification period.

Further, this activity limits the number of interims during a 12-month period for all other income sources reported by families to one during a 12-month period. Therefore, families must decide whether to use their one interim to reduce their rent share or hold on to the interim for a more serious life altering event.

2. Tracking and documenting the implementation of the rent reform activity

HACG will track and document implementation of this rent reform activity through its custom and manual software applications. HACG will set a baseline of interims (total interims for FYE2017) and set corresponding benchmarks for this activity.

3. Identifying the intended and possible unintended impacts of the rent reform activity

Intended Impacts

- Decrease in Contribution Income being reported to “qualify” for more expensive unit only to lose the Contribution Income shortly thereafter, thereby increasing HACG’s subsidy

- Increased accountability by program participants to live within their means (pay fair share of rent)
- Increased sense of preparation for market rate or reduced subsidy (pay fair share of rent for a consecutive period - 12-months or longer)
- Reduction in the number of calculation errors because of multiple rent/rule changes (several programs happening at once) during a 12-month period
- Reduction in the total number of interims conducted by staff during a 12-month period

Possible Unintended Impacts

- Decrease in Income Sources being reported by program participants
- Increase in evictions because program participants are limited to one interim per 12-months
- Increase in fraud program terminations directly related to HACG income audits (failure to report all sources of income)
- Reduction in program participants reporting Contribution Income at all

HACG recognizes that other intended and unintended impacts may result from this rent reform activity and it is HACG's intent to address these possible impacts through education and encouragement of program participants. It is not HACG's intent for this rent reform activity to be administered, implemented, or managed in a punitive manner, but instead for the rent reform activity to assist both program participants and staff in assisting families find affordable housing based on stable income.

4. Measuring the impacts of the rent reform activity

HACG intends to measure the impact of this rent reform activity through baseline to benchmark to outcome comparisons, the number of calculation errors captured through quality control checks, and the amount of staff time saved through the elimination/reduction of Interim Certification Examinations.

HACG anticipates that staff time saved will be dedicated toward new admission eligibility examinations and/or trainings associated with Low-Income Housing Tax Credit (LIHTC) certifications and Rental Assistance Demonstration (RAD) Program requirements.

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.

DESCRIPTION OF ANNUAL REEVALUATION OF RENT REFORM ACTIVITY

During the preparation time of HACG's Annual MTW Report, HACG will review the number of interims conducted for the Annual MTW Report year, the number of zero income families, and collect feedback from certification staff to address negative impacts of unintended consequences of this Rent Reform Activity.

TRANSITION PERIOD

HACG intends to implement this Rent Reform Activity immediately or on the first day of the first month after HUD's approval of this activity for new program admissions and/or at annual recertification examinations for existing program participants.



2018.02 – OVER-HOUSE 1-BEDROOM ELIGIBLE FAMILIES IN 2-BEDROOM UNITS

A. DESCRIPTION OF PROPOSED MTW ACTIVITY

HACG is under-going a business model transformation loosely related to its participation in the MTW Demonstration and RAD Programs. Through self-initiated ventures and participation in the programs, HACG has actively redeveloped and/or repositioned its rental assistance portfolio to meet affordable housing demands of the community and program participation requirements established by HUD and funding agencies.

HACG internally vets and consults with independent parties as part of its redevelopment process. Thus, recent redevelopment and repositioning accomplishments have included the completion of a 100-unit near-elderly community (Patriot Pointe) and the completion of a 106-unit multifamily community¹⁰ (Columbus Commons). Accomplishments also include conversion of 783 conventional PH units to long-term, Section 8 assisted PBV units under the RAD Program with plans to convert another 592 conventional PH units to PBV units under RAD. Further, HACG plans to redevelop Chase Homes, a 108-unit river front site, and HACG continues to retain joint and individual contractual agreements to manage multi-programmed, multi-structured properties for other entities because of its vetting and consultation process.

Using past consultation successes as a template, HACG factored the results of an independent marketing study that suggested a growing need for 2-bedroom units at communities designated for elderly and/or similarly classified resident populations. The results of the independent study guided HACG's development plans in the construction of 19 two-bedroom units in a community designated for "near"-elderly to elderly classified residents.

However, HACG has **not realized a significant demand for, nor interest from** eligible, qualified families in the targeted population group. Even with HACG and its partners **launching involved marketing and recruiting campaigns** during the construction phases, the initial lease-up period, and beyond, have not attracted any of the targeted families to lease a 2-bedroom unit. The lack of demand has created an inventory of under-occupied two-bedroom units with no eligible, qualified families on the horizon. Meanwhile, there are **301 families¹¹ on the Wait List** and 88% of the Wait List needs a 1-bedroom unit. The needs of remaining families are unknown now.

The phenomena of a growing Wait List for 1-bedroom units and the occupancy concern of 2-bedroom units are costly to 1) 1-bedroom families that need affordable, clean, decent housing, 2) to LIHTC stakeholders that invested resources in the "near"-elderly concept, and 3) to HACG's effectiveness to help

¹⁰ Projected completion date is August 2017

¹¹ Wait List count is as of February 28, 2017

families that meet all other eligibility requirements besides the family size in their advanced age. , the driving forces behind HACG's proposal of this activity that will increase housing choice and promote cost efficiency.

Through the proposal and subsequent approval of this activity, HACG will utilize **MTW Authorizations, D.1.b and D.2.b**, of the Amended and Restated MTW Agreement to accomplish the following activities:

- **Over-house**, 1-bedroom eligible families in 2 bedroom units at HACG and HACG affiliated "near"-elderly, elderly, and similarly HACG defined sites, **until an appropriate sized family becomes available** for occupancy of that unit
- **Provide gap payment assistance** to the landlord for the rent difference between the 1-bedroom eligible family's income means and/or voucher amount and up to the full unit rent for a 2-bedroom unit at the designated site. Gap payment **assistance will only occur** at HACG designated sites **until an appropriate sized family becomes available** for occupancy of the gap, payment assisted unit

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

B. DESCRIBE HOW ACTIVITY WILL ACHIEVE ONE OR MORE OF THE STATUTORY OBJECTIVES:

Through approval of this activity, HACG achieves the statutory objective of **Increasing Housing Choices** to a segment of the population that has limited access to modern, efficient, high-quality affordable housing options.

The activity also achieves **Cost Effectiveness** by deliberately using Federal funds to assist a growing segment of the population with limited housing options and limited income rather than face the following bleak prospects of:

- Losing revenue by over-housing families that cannot afford the rent difference AND continuing to incur 2-bedroom maintenance costs
- Accruing holding costs associated with maintaining vacant units in rent ready condition
- Facing the expensive proposition of refitting 2-bedroom units to meet 1-bedroom unit requirement needs
- Re-facing the expensive proposition of undoing the unit refit to meet 2-bedroom requirement needs later

C. IDENTIFY AND DISCUSS THE ANTICIPATED IMPACT OF ACTIVITY ON STATED OBJECTIVES:

Under this activity, HACG can provide quicker assistance to 1-bedroom eligible families that would otherwise not be helped due to the lack of 1-bedroom availability and the low turnover rates for 1-bedrooms, while lowering holding costs associated with carrying vacant and under-occupied units.

Currently, there is a supply of 19¹² **two-bedroom units** assisted by HACG located at a “near”-elderly community that **does not have a 2-bedroom eligible family demand**. Therefore, without approval of this activity, HACG is relegated to a series of **ineffective cost options that reduce housing choices** for “near”-elderly, elderly, and similarly classified families, which is a growing population.

HACG identifies various options and compares the anticipated impacts of those options in the scenarios that follow:

1. Without approval of this activity, landlord will continue to carry under-occupied 2-bedroom units until an appropriate sized family becomes available. The current Wait List does not contain eligible, qualified families for these units, so an extended period of under-occupancy and loss income may be necessary:

OVER HOUSE FAMILIES WITH GAP PAYMENT ASSISTANCE IMPACT ANALYSIS*				
Scenario	# of Under-Occupied Units	Diff. Btwn 1-BR and 2-BR FMRs ^	Monthly Rent	Annual Dollars
Status Quo: Continue Under-Occupancy	19	\$ (129.00)	\$ (2,451.00)	\$ (29,412.00)
Scenario	# of Under-Occupied Units	Avg. Diff. Btwn 1-BR / 2-BR VOs	Mthly Payment to Landlord	Annual Gap Assistance
Gap Payment	19	\$ 193.80	\$ 3,682.20	\$ 44,186.40

HACG Chart 5a

*As of December 31, 2016

^Source: 2016 Fair Market Rent (FMR) information for Columbus, GA MSA

Keeping 2-bedroom units **under-occupied is not an effective use Federal dollars**. Buildings, equipment, units, and similar items need preventive maintenance performed **to continue to provide housing choices** that meet or exceed Housing Quality Standards. As demonstrated above, gap payment assistance is more **Cost Effective** and provides HACG with the ability to **Increase Housing Choices** for a very specific growing population with limited housing options, limited income, and reduced resource alternatives.

¹² Source: HACG’s Tenant Selection Office

2. Without approval of this activity, a landlord may have to carry vacant 2-bedroom units until an appropriate sized family becomes available. Since the current Wait List does not consist of eligible, qualified families for these sized units, an extended carrying cost of vacant 2-bedroom units may be necessary:

Scenario	# of Vacant Units ^{*^}	Est. Value of 2-BR Voucher ^{^*}	Monthly Rent	Annual Dollars
Carry Vacant Units	19	\$ (699.30)	\$ (13,286.70)	\$ (159,440.40)
Scenario	# of Under-Occupied Units	Avg. Diff. Btwn 1-BR / 2-BR VOs	Mthly Payment to Landlord	Annual Gap Assistance
Gap Payment	19	\$ 193.80	\$ 3,682.20	\$ 44,186.40

HACG Chart 5b

^{*^}If units are held as vacant

^{^*}1 2-BR unit is occupied by an extremely low-income 2-person family

Carrying vacant 2-bedroom units **is not an effective use Federal dollars.** Beyond preventive maintenance being deferred, carrying vacant units until an appropriate sized family becomes available to occupy the units requires displacing 19 families (20 people) currently being over-housed in 2-bedroom units, which **discontinues to provide housing choices** to “near”-elderly, elderly, similarly classified populations with limited housing options, limited income, and reduced resource alternatives. As shown above, a gap payment assistance option provides a more **Cost Effective** and practical solution that also provides HACG with the ability to retain/**Increase Housing Choices** for this population.

3. Without approval of this activity, a final option inc this analysis may require a landlord to refit 2-bedroom units to meet 1-bedroom utilization standards until an appropriate sized family becomes available. Once that 2-bedroom eligible family becomes available, then a refit of the 1-bedroom unit must take place to meet 2-bedroom utilization standards:

Scenario	# of 2-BR Units	Units for Refit Consideration ^{**}	Estimated Refit Cost per Unit	Total Refit Dollars (Cost) ^{^^}
Refit Units	19	18	\$ 27,500.00	\$ 495,000.00
Scenario	# of Under-Occupied Units	Avg. Diff. Btwn 1-BR / 2-BR VOs	Mthly Payment to Landlord	Annual Gap Assistance
Gap Payment	19	\$ 193.80	\$ 3,682.20	\$ 44,186.40

HACG Chart 5c

^{**}1 2-BR unit is occupied by an extremely low-income 2-person family

^{^^}Estimate does not factor possible relocation costs, which makes a refit more costly

Conducting **perpetual refits of units** from 2-bedroom to 1-bedroom and 1-bedroom back to 2-bedroom to meet standards is a vicious, labor intensive cycle that **does not promote an effective use of Federal dollars** and **does not expand housing choices** of the identified population group anymore than the Agency providing a gap payment assistance. Comparatively, a gap payment assistance option is **Cost Effective** and provides HACG with the ability to **Increase Housing Choices** for a very specific growing population with limited housing options, limited income, and reduced resource alternatives.

Through implementation of this activity, HACG estimates **payment assistance of \$22,093 in FYE2018**, which **saves (net) about \$54,000** when compared with having the units sit unoccupied and/or requiring a “near”-elderly family to pay above their means and continually face late fees or the prospect of being homeless.

D. ANTICIPATED SCHEDULES FOR ACHIEVING THE STATED OBJECTIVES:

HACG anticipates an immediate schedule implementation for achieving the stated objective, increasing housing choices, once the activity is approved:

- Immediately present 2-bedroom unit options to 1-bedroom eligible families on Wait Lists at pre-defined sites:
 - Complete waiver of understanding prior to unit acceptance:
 - Understanding that over-housing is granted until an appropriate sized family becomes available
 - Understanding that payment assistance to “bridge” the gap is offered until an appropriate sized family becomes available. As income increases, the gap payment assistance will decrease
 - Eligibility, qualifications, and similar elements for continued occupancy will be reviewed annually
 - Once an appropriate sized family reaches the top of the Waiting List and a right-sized unit becomes available that meets the accommodation needs of the impacted family, HACG will issue a 30-day notice to the impacted family for the family to move

The 30-day notice meets the minimum standard afforded to landlords¹³ regarding lease termination. Because of the planned notification period and HACG’s plans to change its fiscal year period, **HACG anticipates implementing this activity on July 1, 2017** for new program participants and *may* conduct an annual certification examination in preparation of the new fiscal year start date (January 1, 2018).

¹³ GA Landlord Tenant Handbook, published by GA Department of Community Affairs

E. STANDARD HUD METRICS THAT HACG ANTICIPATES AS A RESULT OF ACTIVITY:

HACG anticipates the following Standard HUD Metrics for this activity

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

F. BASELINE PERFORMANCE LEVEL FOR EACH METRIC (NUMERIC VALUE) PRIOR TO IMPLEMENTATION OF MTW ACTIVITY:

HC #4: Displacement Prevention				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households at or below 80% AMI that would lose assistance or need to move (decrease). If units reach a specific type of household, give that type in this box.	Households losing assistance/moving prior to implementation of the activity (number).	Expected households losing assistance/moving after implementation of the activity (number).	Actual households losing assistance/moving after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
	19	0	TBD	\$ -

HC #5: Increase in Resident Mobility				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households able to move to a better unit and/or neighborhood of opportunity as a result of the activity (increase).	Households able to move to a better unit and/or neighborhood of opportunity prior to implementation of the activity (number). This number may be zero.	Expected households able to move to a better unit and/or neighborhood of opportunity after implementation of the activity (number).	Actual increase in households able to move to a better unit and/or neighborhood of opportunity after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
	1	19	TBD	TBD

G. GIVE THE YEARLY BENCHMARKS FOR EACH METRIC (A NUMERIC VALUE):

Annual Benchmark						
Unit of Measurement	Baseline FYE2017*	FYE2018	FYE2019	FYE2020	FYE2021	FYE2022
Number of households at or below 80% AMI that would lose assistance or need to move (decrease).	19	0	0	0	0	0
Number of households able to move to a better unit and/or neighborhood of opportunity as a result of the activity (increase).	1	19	19	19	19	19
Number of households receiving services aimed to increase housing choice (increase).	0	19	19	19	19	19

*Estimated. Final baseline is reported in the Annual MTW Report

H. DESCRIBE THE FINAL PROJECTED OUTCOME(S) OF THE MTW ACTIVITY FOR EACH METRIC:

The final projected outcome for the MTW Activity for each metric in the table under item G will be captured in HACG's 2018 Annual MTW Report.

I. GIVE THE DATA SOURCE FROM WHICH METRIC DATA WILL BE COMPILED:

HACG will use its client tracking software data and supplemented by interview notes, rent roll rosters, and similar information collected by and reported to HACG staff during intake, annual, and interim examinations.

J. CITE THE AUTHORIZATION(S) THAT GIVE THE FLEXIBILITY TO CONDUCT THE ACTIVITY:

Authorization D.1.b allows HACG to determine the length of the lease period, when vouchers expire and when vouchers will be reissued

Authorization D.2.b allows HACG to determine contract rents. . . and to determine the content of contract rental agreements

K. EXPLAIN WHY THE CITED AUTHORIZATION(S) IS/ARE NEEDED TO ENGAGE IN THIS ACTIVITY

Authorization **D.1.b is needed** to authorize HACG “. . .to waive certain provisions of. . .24 CFR 983 Subpart F [- Occupancy] as necessary to implement the Agency’s Annual MTW Plan”, to modify 24 CFR 983.251, 253, 254, and 260 **to over house 1-bedroom eligible families in two-bedroom units**, as funding permits, **until an appropriate sized, eligible family becomes available** for occupancy of that unit, as well as address any other part of Subpart F that is necessary for HACG to implement its Annual MTW Plan.

Authorization and **D.2.b, is needed** to authorize HACG “. . .to waive certain provisions of. . .24 CFR 983 Subpart E [- HAP Contract Information] as necessary to implement the Agency’s Annual MTW Plan”, to modify 24 CFR 983.201, 202, 203, and 205 **to provide gap payment assistance** to 1-bedroom eligible family’s voucher value and two-bedroom rental amounts, as funding permits, **until an eligible, qualified, appropriate sized family becomes available**, as well as address any other part of Subpart E that is necessary for HACG to implement its Annual MTW Plan.

Under these authorizations, HACG intends to provide gap payment assistance to 1-bedroom eligible families leasing a 2-bedroom unit (up to 120% of FMR at a HACG designated PBV community

L. ADDITIONAL INFORMATION FOR RENT REFORM ACTIVITIES

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

IV. ON-GOING MTW ACTIVITIES: HUD APPROVAL GRANTED

A. Implemented Activities

2014.01 - Community Choice

Description/Status Update: This activity utilizes MTW Authorizations, D.2.a and D.2.b, of the Amended and Restated MTW Agreement to modify a portion of its Tenant-Based Voucher (TBV) Program guidelines to increase voucher payment standards above the conventional Public Housing Authority (PHA) authorization level. Although introduced in HACG's 2014 Annual MTW Plan, the activity was re-proposed and **approved in HACG's 2015 Annual MTW Plan**. The re-proposed activity allows HACG to modify its payment standards to 120% of the Fair Market Rent (FMR)¹⁴ for 80 TBVs dedicated to this activity.

An original component of this activity included HACG modifying its TBV Program guidelines to project-base 40 vouchers at properties in areas of opportunity. However, **HACG** did not receive interest from property owners in any of the defined areas and **re-tooled the project-basing component** of the activity **to the re-proposed, approved activity** using TBVs as bulleted below:

- Maintaining the concept of 3 Evaluation Groups, the activity includes:
 - 40 TBVs at 120% of FMR for the **Community-Wide Group**
 - No limitations nor restrictions
 - 40 TBVs at 120% of FMR for the **Location Restricted Group**
 - Limited to low-poverty areas defined by HACG in FYE2014
 - 40 TBVs at 90% of FMR for the **Comparison/Control Group**
 - 90% of FMR is HACG's normal payment standard issuance

Vouchers under this activity are not portable.

Evaluation groups are filled by volunteering families that are required to complete surveys annually. HACG's third-party activity evaluator¹⁵ oversees the survey process and analyzes the results to learn if a higher valued TBV influenced the family's housing choice and/or other elements, such as education, employment, health, socialization, etc... impacted their choice.

Activity Status: Activity is being tracked and reported on in HACG's Annual MTW Report. The next page includes a table showing the current participation levels of each group:

¹⁴ Set by HUD annually

¹⁵ HACG has an agreement with Columbus State University to conduct evaluations on specific MTW Initiatives

Evaluation Group	FYE2017 [^] Count	% of Activity Commitment
Community Choice - Participation		
Community-Wide	42	5.0%
Location Restricted	44	10.0%
Comparison/Control	46	15.0%

HACG Chart 6

[^]As of December 31, 2016

The current count is above the 40-voucher activity commitment. This overage is attributed to program attrition. The average participation count since activity approval is 41, 36, and 41 respectively.

Since a primary interest of the activity is to test whether a higher valued TBV influences a family's decision to move into an area of opportunity, HACG includes the percentages of families that chose low-poverty areas defined by Census Tracts. HACG identified 16 low-poverty Census Tracts from which voucher-holding families must choose:

Evaluation Group	FYE2015 Percentage	FYE2016 Percentage	2015 to 2016 % Change	FYE2017 Percentage [^]	2016 to 2017 % Change
Community Choice- Percent of Families Choosing Low-Poverty Areas					
Community-Wide	12.8%	12.2%	-4.9%	14.3%	17.1%
Location Restricted	78.3%	88.1%	12.6%	86.4%	-2.0%
Comparison/Control	6.5%	13.0%	102.2%	13.0%	0.0%

HACG Chart 7

[^]As of December 31, 2016

An exhaustive evaluation of this initiative is conducted by Columbus State University (CSU), HACG's third party evaluator.

HACG anticipates the following for the **Community Choice Activity** in FYE2018:

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

2014.02 – Innovations to Reduce Homelessness

Description/Status Update: This activity utilizes MTW Authorizations, D.2.a, D.2.b, and D.4, of the Amended and Restated MTW Agreement to modify a portion of its TBV Program guidelines. The activity was **approved in HACG's 2014 Annual MTW Plan** to create a Tiered Rent Schedule, provide a selection preference to veterans, and waive the minimum rent for veteran families, and dedicating up to 150 TBVs as MTW Rapid Rehousing Vouchers (RRVs).

The approved TBV Program modifications allow HACG to use MTW RRVs to house the chronically homeless and link these families to supportive services designed to help the family provide a stable living environment and address/increase independent living skills for participating families.

The approved TBV Program modifications also allow HACG to provide the following preferences and incentives to veterans in the community:

- A selection preference for veterans when all eligibility is equal
- Waived (initial 12 months) minimum monthly rent (\$50) when veterans enter the activity unemployed (waiver expires in month 13)
- Lower rent calculation when unemployed veteran returns to the workforce. Newly employed veterans are placed on a Tiered Rent Schedule and their rent calculation percentage is indicated below:
 - 26% in Year 1 • 27% in Year 2 • 28% in Year 3 • 29% in Year 4 • 30% in Year 5

Elements for families to qualify for a MTW RRV include:

- ✓ Meet HUD's chronically homeless definition
- ✓ Active in case management services with American Work, the Georgia Department of Behavioral Health and Development Disabilities (GA DBHDD), New Horizons, or similar (*service provider refers family*)
- ✓ Have a Vulnerability Index – Service Prioritization Decision Assistance Tool (VI-SPDAT) score of 10 or greater
- ✓ Meet TBV eligibility requirements

Last year's (FYE2017) dedication completed HACG's original 150 voucher commitment from its TBV authority. However, the local point-in-time count and priority commitments may warrant future issuances under this activity. The 150-voucher commitment maps out on the next page as follows:

- **30 TBVs** coded as MTW RRVs **in FYE2014**
- **50 TBVs** coded as MTW RRVs **in FYE2015**
- **40 TBVs** coded as MTW RRVs **in FYE2016**
- **30 TBVs** coded as MTW RRVs **in FYE2017**

Vouchers under this activity are not portable and are issued on a referral basis. Referrals are made by the non-profit organization Home for Good (HfG), which serves as a de facto clearing house (e.g., HMIS data entry, preliminary

eligibility screening, wait list maintenance and management, et al) for HACG, local homeless agencies, shelters, mental health service providers, and similar related agencies, as well as serves as the lead Continuum of Care (CoC) Agency.

Activity Status: Activity is being tracked and reported in HACG’s Annual MTW Report. The table below reflects the historical participation count and the average time families have been housed under this activity:

Fiscal Year Ending	Active Families	Veterans	Avg. Time Housed (Yrs)
Innovations to Reduce Homelessness - Highlights			
2014	19	0	0.3
2015	40	6	0.6
2016	43	8	1.1
2017 [^]	5	2	1.6

HACG Chart 8

[^]As of December 31, 2016

An exhaustive evaluation of this initiative is conducted by CSU, HACG’s third party evaluator.

HACG anticipates the following for the **Innovations to Reduce Homelessness Activity** in FYE2018:

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

2014.03 – Administrative Reforms

Description/Status Update: This activity utilizes MTW Authorizations, D.3.a and D.3.b, of the Amended and Restated MTW Agreement to modify a portion of its TBV Program guidelines. The activity was **approved in HACG’s 2014 Annual MTW Plan** to increase the asset threshold to \$50,000 before income derived from assets is included in the rent calculation, to create and/or modify existing forms for local form use, and to increase the income cap from 40% to 50% to expand housing choices to families.

Under this activity, TBV-holding families can self-certify their asset income once all sources of income are verified and income is subject to random verification thereafter. The ability to exclude this verification step saves time during the certification process since many extremely low-income, very low-

income, low-income, and “working poor” families do not have enough assets to generate income to significantly impact the rent calculation.

Further, the activity continues to eliminate the 40% income cap, which allows active HCV families to use more of their income for rent, which may include the ability to take advantage of rental units in areas of higher opportunity. Through the elimination of the income cap, HACG effectively set the “rent burden” at 50%. Therefore, families can use up to 50% of their income for rent purposes.

HOPE VI projects, mixed-finance, mixed-income communities, and similar sites are excluded from the components of this activity.

Activity Status: Originally, this activity included a Public Housing (PH) component, which utilized MTW Authorization C.11 of the Amended and Restated MTW Agreement to modify its PH Program guidelines. The guideline modification allowed HACG to set a \$50,000 asset threshold before income derived from assets was included in the rent calculation formula.

HACG is closing the PH component of the activity because HACG received Commitment to enter into a Housing Assistance Payments (CHAP) Contract to convert its full PH rental unit portfolio to long-term Section 8 PBV units under the RAD Program and needs to meet the Low-Income Housing Tax Credit (LIHTC) funding requirements of the administering Housing Finance Agency (HFA), the Georgia Department of Community Affairs (GA DCA).

HACG initiates close out procedures in its 2017 Annual MTW Report.

To date, HACG has not identified any families exceeding the \$50,000 asset threshold. Meanwhile, an overview count of families that chose to use more than 40% of their income towards rent is captured in the table below:

FYE	Families >40% Income	% of HCVs >40% Income
Administrative Reforms Activity Highlights		
2014	366	15.7%
2015	561	24.0%
2016	651	24.0%
2017 [^]	448	16.5%

HACG Chart 9

[^]Projected through June 30, 2017

HACG anticipates the following for the **Administrative Reforms Activity** in FYE2018:

- A non-significant change to this initiative includes the removal of Public Housing (PH) components to maintain compliance with LIHTC and RAD Program requirements since HACG is converting its portfolio of PH units under RAD, with the use of LIHTC and/or similar funding vehicles
- A modification to the metrics will exclude PH households at or above the \$50,000 asset threshold set in this activity
- No additional or deleted authorizations are needed to implement this initiative than originally proposed
- No significant changes to this initiative

2014.04 – Administrative Efficiencies

Description/Status Update: This activity utilizes MTW Authorizations, C.4 and D.1.c, of the Amended and Restated MTW Agreement to modify its PH and TBV Program guidelines. The activity was **approved in HACG’s 2014 Annual MTW Plan** to create local forms and/or modify relevant forms for local form use and to establish a triennial certification examination schedule.

Through approval of this activity, local forms have an expiration date of 39 months or no expiration date at all and all such forms were reviewed and/or approved by HUD in FYE2014.

The approval of this activity, also authorizes HACG to place eligible families on a triennial certification examination schedule since much of eligible families’ annual income remains relatively the same. Placement on the triennial certification cycle depends on the eligibility of the head-of-household (HoH), as well as the income source(s) of the household. The eligibility requirements are defined below:

- HoH must be classified in at least one of the categories listed below:

• <i>Disabled</i>	• <i>Elderly / Disabled; OR</i>
• <i>Elderly</i>	• <i>Classification(s) Defined by HACG</i>

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

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

- Households with other income sources, whether received by the HoH, spouse, dependent, or any other defined household member, will continue to recertify annually
- Examples of non-fixed income sources that will exclude a household:

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

Activity Status: Locally created forms will expire during the fiscal year, so HACG seeks to renew use of local forms, relevant to its Housing Choice Voucher (HCV) Program operations, set to expire during FYE2018.

HACG closes out the PH and RAD PBV elements of this activity since HACG is amid converting its portfolio of PH units to long-term, Section 8 assisted PBV units under the RAD Program with the financial assistance of LIHTC funds. Due to annual LIHTC requirements, application of this activity against PH and RAD PBV units makes this activity obsolete.

Further, HACG desires some semblance of continuity between its rental assistance programs for comparison and reporting purposes, as well as reduce “sticker shock” for fixed-income program participants by making minor annual adjustments. HACG recognizes that PBV and TBV program participants impacted by the activity may realize sharp adjustments every three years if income sources, utility allowance, and similar categories are not adjusted annually.

To reduce the “wow” effect, HACG modifies the activity for staff to conduct “mini-interims” each year on the portion of program participants not due for an annual certification examination, while maintaining a fully involved certification examination during the program participant’s triennial certification cycle.

HACG anticipates the following for the **Administrative Efficiencies Activity** in FYE2018:

- A non-significant change to this activity includes the close out of PH and RAD PBV elements of this activity. Additionally, HACG incorporates an annual adjustment to income, utility allowance, and similar categories to reduce the number of fixed-income participants facing a sharply increased out-of-pocket amount
- A modification to the metrics during this period *may* include an adjustment to the number of families as PH units are removed because of unit conversion under the RAD Program and/or LIHTC requirements

- No additional or deleted authorizations are needed to implement this initiative than originally proposed
- No significant changes to this initiative

2014.06 – Rent Reform (Farley)

Description/Status Update: This activity utilizes MTW Authorizations, C.4 and C.11, of the Amended and Restated MTW Agreement to modify its PH Program guidelines. The activity was **approved in HACG’s 2014 Annual MTW Plan** to increase the minimum rent and offer a Tiered Rent Calculation Schedule at HACG’s MTW test site, E.E. Farley (**Farley**) Homes. Additionally, the activity intensifies self-sufficiency programming and introduces Financial Incentive Policies while comparing the impact of these actions to a demographically similar property in Louis Chase (**Chase**) Homes, which serves as the control site.

The table below illustrates the “baseline” similarities between the sites:

Demographic Category	Chase	Farley
Rent Reform Site Comparison Demographics*		
Number of Units	108	102
Number of Employed Heads-of-Household	36	40
Average Annual Earned Income	\$ 13,697	\$ 12,530
Rent of Employed Households (Avg.)	\$ 191.00	\$ 186.00
# of Unemployed Households	45	44

HACG Chart 10

*Source: HACG Finance, March 2013

Under this activity, HACG increased the minimum rent only at Farley from \$50.00 per month to \$100.00 per month. Second, HACG designed a Tiered Rent Calculation Schedule for selected application. Unemployed Farley residents that join and/or return to the workforce are considered for the Tiered Rent Calculation Schedule, which is illustrated below:

- 26% in Year 1 • 27% in Year 2 • 28% in Year 3 • 29% in Year 4 • 30% in Year 5

***Note,** the calculation schedule returns families back to the standard 30% calculation over 5-years with the hope of promoting stability and creating a culture of employment for residents. Eligibility requirements for the tiered rent incentive are bulleted below:*

- Existing Farley residents¹⁶ unemployed for 6+ consecutive months
- New, unemployed PH admissions (HoHs) assigned to Farley
- Existing, unemployed, HACG residents transferred to Farley by HACG
 - “Transferred by HACG” *may* include transfers related to health or safety reasons, modernization/redevelopment plans, and/or similar transfers **initiated by HACG**
 - Non-eligible transfers *may* include transfers initiated/requested by resident related to unit/site change for family, school, and/or work-related reasons, for medical reasons, specific Farley requests, and similar **resident initiated** transfer requests

Additional incentives under this activity include an increased, focused Family Self-Sufficiency (FSS) programming¹⁷ presence at Farley, as well as the introduction of Financial Incentive Policies. These incentives are to directly assist residents that join and/or return to the workforce. The FSS programming presence is directed to plan and host onsite workshops, provide a strong referral and connection presence, provide light case management, and other relatable services designed to assist and prepare unemployed families to become employed.

The Financial Incentive Policies help Farley families with out-of-pocket expenses associated with joining and/or returning to the workforce. The policies, based on the availability of funding, include the provision of:

- Assistance with childcare
- Assistance with transportation
- Assistance with work equipment, supplies, uniforms, and similar

Activity Status: The appearance and programming composition of Farley has changed since approval of this activity. Farley had aesthetic work, which HACG’s third-party evaluator factored into its analysis. Since then, Farley has undergone interior work completed under HACG’s RAD I Rehabilitation Project directly related to its 102-unit conversion under RAD with the use of LIHTC funding that includes implementation of a more stringent eligibility process for residents to live there. Meanwhile, Chase has not experienced any changes in aesthetics, modernization/rehabilitation work during the same period. These changes and **HACG’s ROSS grant ending September 2016**, may be noteworthy changes influencing outcomes and the activity’s impact.

The table below illustrates the trending impact in the form of rents between the eligibility processes for conventional PH at Chase and RAD PBV housing with LIHTC funding at Farley:

¹⁶ Heads-of-Household captured as of June 30, 2013, (prior to execution of HACG’s MTW agreement)

¹⁷ HACG’s Resident Opportunities and Self-Sufficiency (ROSS) Program ended September 2016

Site / FYE	2013*	2014	2015	2016	2017^	Trend
Rent Reform (Farley) - Average Monthly Rent Comparison						
Chase	\$ 93.19	\$ 100.28	\$ 111.67	\$ 120.59	\$ 101.86	
Farley	\$ 90.91	\$ 103.13	\$ 144.07	\$ 174.22	\$ 175.29	

HACG Chart 11

*Amount prior to MTW designation; ^As of December 31, 2016

The table below illustrates the number of Farley units eligible for the tiered rent incentive and the number of families that reported earned income:

Fiscal Year Ending	Eligible* for Tiered Rent	# w/Earned Income*	% w/Earned Income
Rent Reform (Farley) - Families Reporting Earned Income			
2013^	46	0	0.0%
2014	44	5	11.4%
2015	37	10	27.0%
2016	28	17	60.7%
2017*^	22	14	63.6%

HACG Chart 12

*Denotes eligibility, not the actual application of the incentive

^Final count as of June 2013; *^As of December 31, 2016

HACG attributes the yearly decreases of eligible families directly to leasing activity and to the exclusiveness of the tiered rent incentive. The use of leasing activity is meant to encompass property turnover, such as evictions and skips, as well as property attrition such as lease terminations in good standing. The exclusivity of the incentive relates to the one-time offering of the incentive. If an eligible family gains employment, terminates employment (involuntary or voluntary), and then regains employment, the family does not return to the tiered rent schedule. Those families return to the normal rent calculation.

The financial incentive utilization relies on direct referrals from FSS Program Coordinators. The table on the next page illustrates the number of referrals provided by the FSS Program Coordinators in relation to eligible families reporting employment:

FYE	Families Eligible for Financial Incentive	Eligible Families Returning to Work	Working Families Referred by FSS/ROSS	% of Working Families Assisted
Rent Reform (Farley) - Families Receiving Financial Incentive				
2013*	46	0	0	N/A
2014	44	5	0	0.0%
2015	32	10	1	10.0%
2016	23	17	0	0.0%
2017^	19	14	0	0.0%

HACG Chart 13

*Denotes the number of unemployed HoHs to start this activity

^As of December 31, 2016

HACG anticipates the following for the **Rent Reform (Farley) Activity** in FYE2018:

- A non-significant change to this activity includes the ending of ROSS programming since the units at Farley converted to PBV units under the RAD Program
- No modification to the metrics during this period
- No additional or deleted authorizations are needed to implement this initiative than originally proposed
- No significant changes to this initiative

2015.02 – Portability Restrictions

- **Description/Status Update:** This activity utilizes MTW Authorization, D.1.g, of the Amended and Restated MTW Agreement to modify its TBV Program guidelines. The activity was **approved in HACG’s 2015 Annual MTW Plan** to limit moves into and out of HCAG’s service jurisdiction by restricting TBV portability to verifiable employment related moves.

HACG administers and manages just north of 2,300 TBVs and Tenant-Protection Vouchers (TPVs)¹⁸ under its voucher management authority in a community where a significant portion of the population is transient. HACG discovered that a fair number of its issued TBVs would end up in more expensive jurisdictions, which negatively impacts HACG’s budget authority and negatively influences the number of local families that HACG can assist.

¹⁸ Tenant-Protection Vouchers convert to Tenant-Based Vouchers after 12 consecutive months

Further, HACG also discovered itself managing several TBVs from other jurisdictions, some higher, some lower than HACG's service jurisdiction that were not paying for their issued TBV. Beyond the account receivable "nightmare", managing port in vouchers also negatively impacts HACG's budget authority and negatively influences the number of families that it can assist.

Therefore, HACG restricts TBV ports into and/or out of HACG's service jurisdiction to verifiable employment related reasons, which *may* include:

- A Letter of intent to employ (job offer letter), reassign, transfer, etc...
- Permanent Change of Station (PCS) orders, transfer orders, et al
- Any similar document(s) addressed to the HoH that will assist HACG in deciding the acceptance of ports into or approval of ports out of HACG's service jurisdiction
- Families may lose their rental assistance if a loss of employment occurs at the new location (port in or port out) within the first six-months or before either Agency absorbs the voucher of the approved employment-related port

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

Activity Status: HACG used the better part of FYE2015 to approve and/or deny pending ports into and ports out of Columbus. After which, HACG "grandfathered" remaining TBV families. Since the start of HACG's FYE2016, HACG **has not received any requests petitioning it to consider a general port into or out of** its service jurisdiction for any reason. Additionally, HACG **has not received any hardship requests** petitioning it to consider a port into or out of its service jurisdiction.

HACG anticipates the following for the **Portability Restrictions Activity** in FYE2018:

- A non-significant change to this initiative includes a point of clarification
- No modification to the metrics during this period
- No additional or deleted authorizations are needed to implement this initiative than originally proposed
- No significant changes to this initiative

2015.03 – Simplify Utility Allowance (UA) Calculation (HCV Only)

- **Description/Status Update:** This activity utilizes MTW Authorization, D.2.a, of the Amended and Restated MTW Agreement to modify its HCV and PH Program guidelines. The activity was **approved in HACG's 2015 Annual MTW Plan** to provide simplified Utility Allowance (UA) Schedules to limit confusion amongst clients, landlord partners, and

new staff, as well as simplify the calculation of a voucher-holding family's utility allowance.

- Two amendments to the activity was **approved in HACG's Amendment to the 2016 Annual MTW Plan** that provided HACG with the ability to use PH UA Schedules at former PH sites converted to a RAD/PBV site. appropriate to its changing rental portfolio. The final activity amendment was **approved in HACG's Second Amendment to the 2016 Annual MTW Plan** that provided HACG with the ability to use the results of energy studies as the UA Schedule at Mixed-Finance, Mixed-Income Communities.
- Previous UA Schedules provided an assortment of utility scenarios for a variety of rental dwelling possibilities and whenever a voucher-holding family deviated from the proposed UA scenario, Occupancy Specialists/Managers had to re-calculate the rental assistance based on the utilities utilized at the selected unit. The "back-and-forth" caused re-calculation changes to the family's voucher value and took up precious time for HACG staff to explain and re-explain the way the "new" unit affected the voucher amount and family's share.
- This activity limits the varying scenarios and reduces the frustration levels for involved parties through the introduction of a simplified UA Schedule as identified below:

Monthly Utility Allowance by Bedroom Size	0 BR	1 BR	2 BR	3 BR	4 BR	5 BR
Simplified Utility Allowance (UA) Schedule - HCV TBV Schedule*						
Paid by Tenant - Water, Sewer, Trash Service	\$ 131.00	\$ 154.00	\$ 180.00	\$ 223.00	\$ 268.00	\$ 310.00
Paid by Landlord - Water, Sewer, Trash Service	\$ 102.00	\$ 117.00	\$ 134.00	\$ 161.00	\$ 189.00	\$ 216.00

HACG Chart 14

*As of December 31, 2016

Under amendments to this activity, HACG identifies UA Schedules for other programming units in HACG's rental portfolio. Identified on the next page are the three UA Schedules and their corresponding programs:

Utility Allowance (UA) Schedule	Program Utilization	Estimated Unit Application*
Simplified Utility Allowance Calculation - UA Schedules		
Simplified UA Schedule	HCV, TBV	2323
Public Housing UA Schedule	PH Sites (Remaining); RAD Sites (Former PH)	1344
LIHTC UA Schedule (Current Utility Study)	Assisted Units in Mixed-Use Communities	400

HACG Chart 15

*As of December 31, 2016

Activity Status: Activity is current and UA Schedules are being used.

HACG anticipates the following for the **Simplified Utility Allowance (UA) Calculation Activity** in FYE2018:

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

2015.04 – Cap Childcare Deductions

Description/Status Update: This activity utilizes MTW Authorizations, C.11 and D.2.a, of the Amended and Restated MTW Agreement to modify its HCV and PH Program guidelines. The activity was **approved in HACG’s 2015 Annual MTW Plan** to limit childcare deductions taken by current and future HCV and PH programming participants.

Under income-based rental assistance programs, HUD provides considerations and deductions to eligible, qualified families’ total income. These considerations and deductions lower a family’s income amount and their corresponding rental amount. Childcare is an extended deduction that can be provided by licensed and unlicensed providers, including family members. HACG discovered that childcare deductions were inordinately high in relation to reported income and introduced this activity to “govern” childcare deductions and curb exaggerated childcare expenses.

This activity presents a deduction cap that mirrors the Georgia Child Care and Parent Services (GA CAPS) reimbursement amounts. CAPS Program is designed to help low-income families afford safe, quality childcare by subsidizing childcare for children under the age of 13¹⁹. Therefore, expenses that exceed the CAPS reimbursement amounts will be reduced to the maximum CAPS reimbursement amount by the appropriate age and category and invalid expenses will not factor into the adjusted annual income calculation.

Hardship requests will be addressed on a case-by-case basis in accordance with the Hardship Policy. HOPE VI, mixed-finance, mixed-income, and similar typed communities are excluded from implementation of this activity.

Activity Status: The certification/recertification examination process has not changed. HCV and PH families still produce verification of childcare expenses and HCV Occupancy Specialists and PH Housing Managers continue to verify submitted documentation to ensure amounts are within CAPS amounts.

HACG's Management Department is charged with maintaining an updated CAPS chart, which may become a shared responsibility with TSO since PH units are being converted to long-term Section 8 assisted PBV units under RAD.

HACG anticipates the following for the **Cap Childcare Deductions Activity** in FYE2018:

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

2016.02 – Non-Competitive Project-Basing Process

Description/Status Update: This activity utilizes MTW Authorization, D.7.a, of the Amended and Restated MTW Agreement to modify its HCV Program guidelines. This activity was **approved in HACG's Amendment to the 2016 Annual MTW Plan**. This activity allows HACG to project-base Section 8 rental assistance at Agency-owned properties on a non-competitive basis.

HACG implemented plans to redevelop Booker T. Washington (BTW) Homes, a functionally obsolete, outdated, high maintenance property in two phases: BTW I, known as Patriot Pointe Senior Residences and BTW II known as Columbus Commons. Since HACG is the sole owner of HACG BTW II GP, Inc., which is the general partner of BTW-Chapman Phase II, L.P., which is the owner of Columbus Commons, HACG applied this non-competitive process to this property. HACG assigned 60 PBVs through Housing Assistance Payment (HAP)

¹⁹ Childcare can be extended to age 18 if the child has special needs

contracts with the owner of Columbus Commons without competition and plans to assign PBVs to future projects of similar complexity without competition.

Activity Status: Through a wholly-owned subsidiary, HACG serves as the general partner of the owner and under a LIHTC partnership developed a phase I, Patriot Pointe, modern, highly efficient, Earth craft certified, low-maintenance structure that contains 100 units. An initial program mapping of Patriot Pointe included 71 HCV units, 24 PH units, and 5 market units.

BTW II, known as Columbus Commons, is a 13-building community with 106 multifamily units with bedroom sizes ranging from 1 to 3 and a central leasing office with community amenities. An initial program mapping of Columbus Commons included 60 HCV units, 31 PH units, and 15 market-rate units.

HACG will retain a purchase option and right of first refusal on both the BTW I/Patriot Pointe and the BTW Phase II/Columbus Commons projects.

HACG anticipates the following for the **Non-Competitive Project-Basing Process Activity** in FYE2018:

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

2016.03 – Project-Basing Flexibilities

- **Description/Status Update:** This activity utilizes MTW Authorization, D.I.e, of the Amended and Restated MTW Agreement to modify its HCV Program guidelines. This activity was **approved in HACG's Second Amendment to the 2016 Annual MTW Plan**, which allows HACG to project-base more than 25% (or in the case of the RAD Program, more than 50%) of the building cap.
- When Public Housing Authorities (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 current PBV regulations for exceeding this (these) caps. However, 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 these "excepted" units²⁰.

Activity Status: HACG is currently offering limited Supportive Services Programming at its recently converted RAD sites, which are still under various phases of modernization/rehabilitation work. HACG plans to mimic service level offerings at Columbus Commons (projected completion date of August

²⁰ Units above the cap amount

2017) during the first year with incremental increases in service levels to meet occupancy rates.

HACG understands that supportive services must be available and that 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. Therefore, preliminary plans to offer a “full menu” of Supportive Services Programming will dovetail with a Columbus Commons occupancy rate of about 95% or greater.

HACG anticipates the following for the **Project-Basing Flexibilities Activity** in FYE2018:

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

B. Activities Not Yet Implemented

2016.01 – Next Step Voucher (NSV)

Description/Status Update: This activity utilizes MTW Authorizations, D.2.d, D.3.a, D.3.b, D.4, of the Amended and Restated MTW Agreement to modify its TBV Program guidelines. This activity was **approved in HACG’s 2016 Annual MTW Plan** to issue TBVs to foster youth aging out of foster care as a homelessness prevention tool.

HACG entered into an agreement with the Georgia Department of Health and Human Services (GA DHHS) to provide up to ten Next Step Vouchers (NSVs) to the DHHS’ local Division of Family and Children Services (DFCS) office for properly referred, eligible foster youth made homeless by aging out of foster care. The NSVs term and time restrictions as bulleted below:

- Aged-out foster youth must begin, continue, and/or maintain appointments and visits with social service providers
- NSVs are “valid” for 36 months or until age 23, whichever comes first
- Aged-out foster youth must meet the 20 hours per week 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 an average of 20 hours per week

Vouchers issued under this activity are not portable.

Activity Implementation Update: In accordance with the final agreement, HACG is prepared to issue NSVs, but **has not received any referrals** from DHHS.

Timeline for Implementation: HACG plans to issue NSVs immediately upon receipt of a properly referred, aged-out foster youth from DHHS and/or DFCS

- There are no known non-significant changes or modifications to this initiative

C. Activities on Hold

There have been no activities placed on hold by HACG.

D. Closed Out Activities

2014.05 – Streamlined Housing Quality Standards (HQS)

HACG **closes out** this **activity** approved in HACG's 2014 Annual MTW Plan. This activity allowed HACG to modify its HCV Program guidelines to conduct biennial Housing Quality Standards (**HQS**) inspections, allow self-certifications by landlords and residents in good standing units, and the levy of a re-inspection fee.

Recent rule and regulation changes outlined in PIH Notice 2016-05 (HA) authorize all Public Housing Authorities (**PHAs**) the ability to perform biennial HQS inspections and the Notice provides PHAs an alternative inspection method for periodic inspections performed by HUD or conducted pursuant to the HOME Investment Partnerships (**HOME**) Program or housing financed using LIHTCs will serve as having conducted a HQS inspection on the unit(s).

Since HACG is converting its PH units to long-term Section 8 assisted PBV units under the RAD Program with the use of LIHTC funding provided under GA's HFA, administered by DCA, and PIH Notice 2016-05 (HA) provides HACG with substantially the same authorizations as gained with the utilization of MTW Authorization D.5 of the Amended and Restated MTW Agreement makes this activity obsolete.

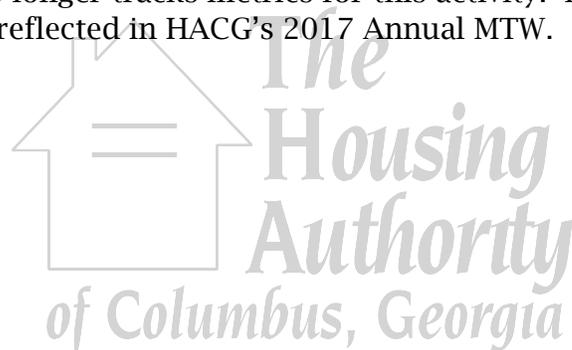
Further, HACG can exercise the alternative inspection method provided, under Attachment K with the adoption of Attachments K and L of the PIH Notice 2016-05. Consequently, metrics for this activity are no longer tracked. It's **close out year is FYE2017** and is reflected in HACG's 2017 Annual MTW.

2015.01 - Eliminate Child Support Income from Rent Calculation (PH Only)

HACG closes out this activity approved in HACG's 2015 Annual MTW Plan that allowed HACG to eliminate verifiable child support income from the gross and adjusted income calculation formulas.

The use of LIHTC funding requires the inclusion of all income. However, through the utilization of MTW Authorization C.11 of the Amended and Restated MTW Agreement HACG could exclude income. Since HACG is converting its PH units to long-term Section 8 assisted PBV units under the RAD Program with the use of LIHTC funding provided under GA's HFA, administered by DCA, HACG anticipates compliance issues with the continued implementation of this activity.

Because of the conflicting processes between meeting LIHTC requirements and exercising approved flexibilities offered using the MTW waiver, HACG no longer tracks metrics for this activity. It's **close out year is FYE2017** and is reflected in HACG's 2017 Annual MTW.



V. SOURCES AND USES OF FUNDS

A. MTW Plan: Sources and Uses of MTW Funds

HACG will present its FYE2018 Annual Operating Budget to its Board of Commissioners (BoC) for adoption at the BoC's June 2017 board meeting.

The tables below reflect HACG's projected budget:

A. MTW Plan: Sources and Uses of MTW Funds		
Estimated Sources of MTW Funding for the Fiscal Year		
PHAs shall provide the estimated sources and amounts of MTW funding by FDS line item.		
Sources		
FDS Line Item	FDS Line Item Name	Dollar Amount
70500 (70300+70400)	Total Tenant Revenue	\$ 815,120.00
70600	HUD PHA Operating Grants	\$ 21,922,370.00
70610	Capital Grants	\$ 3,181,226.00
70700 (70710+70720+70730+70740+70750)	Total Fee Revenue	\$ -
71100+72000	Interest Income	\$ 3,505.00
71600	Gain or Loss on Sale of Capital Assets	\$ -
71200+71300+71310+71400+71500	Other Income	\$ 91,370.00
70000	Total Revenue	\$ 26,013,591.00

Estimated Uses of MTW Funding for the Fiscal Year

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

Uses

FDS Line Item	FDS Line Item Name	Dollar Amount
91000 (91100+91200+91400+91500+91600+91700+91800+91900)	Total Operating - Administrative	\$ 1,984,448.00
91300+91310+92000	Management Fee Expense	\$ 1,270,318.00
91810	Allocated Overhead	\$ -
92500 (92100+92200+92300+92400)	Total Tenant Services	\$ 61,756.00
93000 (93100+93600+93200+93300+93400+93800)	Total Utilities	\$ 300,782.00
93500+93700	Labor	\$ -
94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	\$ 953,562.00
95000 (95100+95200+95300+95500)	Total Protective Services	\$ 15,800.00
96100 (96110+96120+96130+96140)	Total Insurance Premiums	\$ 316,055.00
96000 (96200+96210+96300+96400+96500+96600+96800)	Total Other General Expenses	\$ 111,335.00
96700 (96710+96720+96730)	Total Interest Expense and Amortization Cost	\$ -
97100+97200	Total Extraordinary Maintenance	\$ -
97300+97350	Housing Assistance Payments + HAP Portability-In	\$ 16,065,877.00
97400	Depreciation Expense	\$ 865,324.00
97500+97600+97700+97800	All Other Expenses	\$ 4,068,334.00
90000	Total Expenses	\$ 26,013,591.00

Describe the Activities that Will Use Only MTW Single Fund Flexibility

Funds under FDS line-item "All Other Expenses" are obligated for Columbus Commons and the remaining RAD portfolio. All of HACG activities use MTW waivers in addition to Single Fund Flexibility. The activities are: Eliminate Interims for Families with Contribution Income, Eliminate/Reduce Utility Reimbursement Payments (URPs), Over-House Single-Member Families at Designated Sites, Next Step Vouchers, Simplified Utility Allowance Calculation, Rent Reform, Administrative Efficiencies, Administrative Reforms, Innovations to Reduce Homelessness, and Community Choice as described in either Section (III), Proposed MTW Activities, and/or Section (IV), Approved MTW Activities.

B. MTW Plan: Local Asset Management Plan (LAMP)

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



VI. ADMINISTRATIVE

A. Resolution Adopting the Annual MTW Plan

The resolution adopting the Annual MTW Plan is in the Appendix Section of this document.

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

HACG provided this document for the public to review and to receive its comments on the document from **March 2, 2017** through **April 1, 2017** at the following locations:

- The **Columbus Public Library**, 3000 Macon Road
 - 2nd floor reference desk, Government Documents Section
- HACG's **Central Office**, 1000 Wynnton Road
 - Front Desk
- HACG's **Tenant Selection Office**, 1180 Dr. Martin Luther King, Jr. Boulevard
 - Front Desk

All **comments received prior to April 4 are included** in this document.

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

Attachment D of HACG's MTW Agreement obligates the Agency to introduce activities that address Legacy and Community Specific Authorizations: Rent Reform Controlled Study and Housing Choice Mobility Demonstration. Accordingly, HACG introduced MTW activities, 2014.06 - Rent Reform (Farley) and 2014.01 - Community Choice. HUD approved these activities in FYE2014 and FYE2015 respectively.

Under the Legacy and Community Specific obligations, HACG contracted with Columbus State University's (CSU) Social Research Center in FYE2014 to evaluate the obligated activities, as well as another Department of Housing and Urban Development (HUD) approved activity, 2014.02 - Innovations to Reduce Homelessness.

Since then, CSU dissolved the Social Research Center and re-worked the existing agreement with a new Principal Investigator, Dr. Joy Thomas, assigned

as the agreement lead between HACG and CSU. Under this reworked agreement, CSU will continue the following:

- Evaluate the approved MTW Activities listed above
 - CSU agreed to evaluate activity 2016.01 - Next Step Vouchers (NSV) once HACG implements it
 - CSU collects data through the administration of annual surveys
 - CSU collects data from HACG's client tracking software (HACG provides reports consisting of evaluation data)
- Provide a biennial report to HACG by August 15 - odd years
 - Report should include qualitative and quantitative results of activities, including results of survey data, moving patterns, and more
 - CSU is encouraged to remain on same reporting cycle as other activities are added/deleted for evaluation purposes
 - CSU is developing an evaluative tool for FYE2018 utilization

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

HUD forms associated with this heading are in the Appendix Section.

- HACG's 2016 ACC (with form 50075.1) was submitted to HUD April 2016;
- HACG is operating off the 2013 ACC and 2014 ACC that was submitted to HUD on April 17, 2013 and April 8, 2014 respectively (see HUD Form 50075.02);
 - HACG received an approval letter from HUD dated November 3, 2013,
- Form 50075.1 for previous grants with open, unexpended funds are included in the Appendix Section



Appendix A

RESOLUTION NO. 3275

A RESOLUTION APPROVING THE MOVING TO WORK (MTW) DEMONSTRATION PROGRAM'S FISCAL YEAR 2018 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 of Columbus, Georgia (HACG) by Resolution No. 3166 originally approved submission of a Moving to Work (MTW) Demonstration Application; Annual Plan and Certifications of Compliance to the Department of Housing and Urban Development; and

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

WHEREAS, 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 MTW FY 2018 Annual Plan was made available for public review and comment from March 2, 2017 to April 3, 2017 and public hearings/meetings were held on the proposed FY 2018 plan on March 13, 2017; and,

WHEREAS, HACG considered all comments received regarding said FY 2018 MTW plan;

NOW THEREFORE BE IT RESOLVED by the Board of Commissioners:

1. That HACG's FY 2018 MTW Annual 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 2018 MTW Plan to HUD is authorized.

R. Larry Cardin
Name of Authorized Official

R. Larry Cardin, Chairman
Signature

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

Attachment B

Certifications of Compliance

Annual Moving to Work Plan
 Certifications of Compliance

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

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

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairman or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the Annual Moving to Work Plan for the PHA fiscal year beginning **July 1, 2017**, hereinafter referred to as "the Plan", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:

1. The PHA published a notice that a hearing would be held, that the Plan and all information relevant to the public hearing was available for public inspection for at least 30 days, that there were no less than 15 days between the public hearing and the approval of the Plan by the Board of Commissioners, and that the PHA conducted a public hearing to discuss the Plan and invited public comment.
2. The PHA took into consideration public and resident comments (including those of its Resident Advisory Board or Boards) before approval of the Plan by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the Annual MTW Plan.
3. The PHA certifies that the Board of Directors has reviewed and approved the budget for the Capital Fund Program grants contained in the Capital Fund Program Annual Statement/Performance and Evaluation Report, form HUD-50075.1.
4. The PHA will carry out the Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990.
5. The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.
6. The Plan contains a certification by the appropriate State or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice, for the PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan.
7. The PHA will affirmatively further fair housing by examining its programs or proposed programs, identify any impediments to fair housing choice within those programs, address those impediments in a reasonable fashion in view of the resources available and work with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement and maintain records reflecting these analyses and actions.
8. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
9. The PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
10. The PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
11. The PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.
12. The PHA will comply with requirements with regard to compliance with restrictions on lobbying required by 24 CFR Part 87, together with disclosure forms if required by this Part, and with restrictions on payments to influence Federal Transactions, in accordance with the Byrd Amendment and implementing regulations at 49 CFR Part 24.

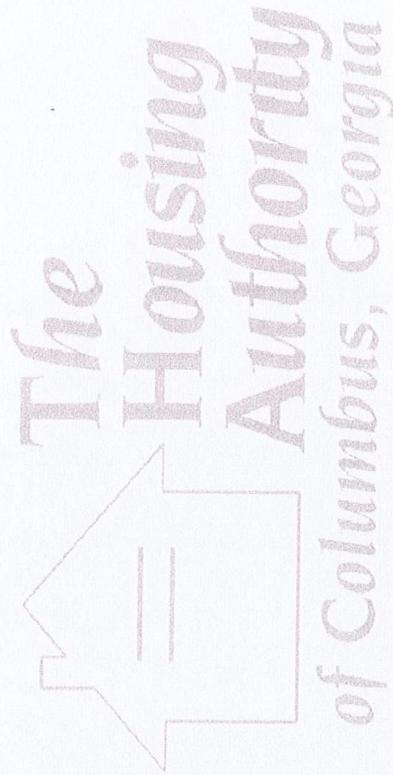
Appendix C

HOUSING AUTHORITY OF COLUMBUS, GEORGIA'S PUBLIC COMMENT PROCESS:		
Date	Action / Event	Attendance Count
Monday, February 27, 2017	Sent email to HACG staff/affiliates announcing public meeting. Included flyer for recipients to print/post in conspicuous areas for clients, employees, landlords, residents, and visitors to see.	42
Thursday, March 2, 2017	Public Hearing announcement, dates published in the Ledger-Enquirer (Columbus' local newspaper) and on HACG's website, www.columbushousing.org	Not Applicable
Wednesday, March 8, 2017	Public Meeting: HACG staff presented 2018 Annual MTW Plan to the Family Self-Sufficiency Program Coordinating Committee.	8
Thursday, March 9, 2017	Public Hearing announcement, dates published in the Ledger-Enquirer (Columbus' local newspaper)	Not Applicable
Thursday, March 9, 2017	Public Meeting: HACG staff presented 2018 Annual MTW Plan to the Columbus, GA/Russell County AL Continuum of Care Board.	9
Monday, March 13, 2017	11 a.m. Public Hearing: HACG staff presented 2018 Annual MTW Plan at the Resident Advisory Board Meeting.	5
Monday, March 13, 2017	4 p.m. Public Hearing: HACG staff presented 2018 Annual MTW Plan at the Resident Advisory Board Meeting.	17
Wednesday, March 15, 2017	Public Meeting: HACG staff presented 2018 Annual MTW Plan at the Joint Presidents' Council Meeting.	25

The Housing Authority of Columbus, Georgia

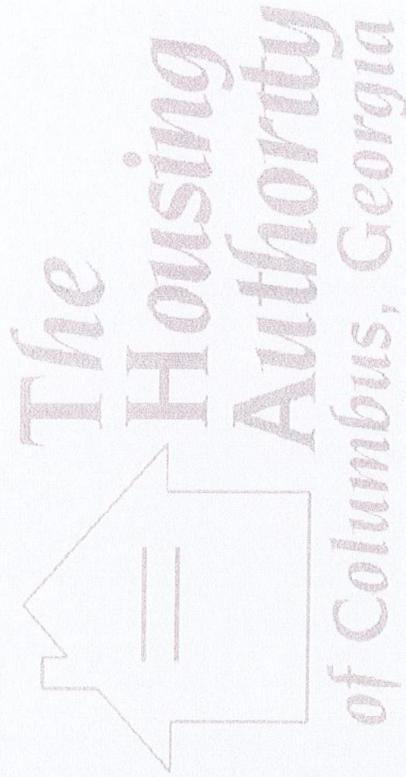
Appendix C

PUBLIC MEETING - WEDNESDAY, MARCH 8, 2017 @ 3:30 p.m.	
Commenter / Comment	HACG's Response
HACG did not receive any comments	N/A



Appendix C

PUBLIC MEETING - THURSDAY, MARCH 9, 2017 @ 2:00 p.m.	
Commenter / Comment	HACG's Response
HACG did not receive any comments	N/A



Appendix C

PUBLIC HEARING - MONDAY, MARCH 13, 2017 @ 11:00 a.m.	
Commenter / Comment	HACG's Response
[There] should be more residents in attendance to voice their opinion	HACG publishes its public meeting schedule in the Ledger-Enquirer, posts flyers in rental offices, and sends invitations to members, partners, and service providers
HACG should send special notification to homebound residents	HACG will revisit its notification process and consider a special notification process for external and internal special population groups
How would a Regional MTW Agency work?	HACG speculates, since this is a conceptual idea at HUD, that it would serve in a consulting role for smaller PHAs in the region and would extend its MTW flexibilities to these smaller PHAs
What will HACG do with residents when relocation happens [at Elizabeth Cauty and Warren Williams]	HACG will share relocation information as soon as it is known. HACG also plans to continue individual consultations with Heads-of-Household as relocation details become clearer
Inquired about live-in care taker [with regard to Over-Housing MTW Activity]	HACG's initial plan is to relocate residents within the property, at HACG sites, HACG affiliate sites, and then private sites, such as local hotels on a temporary basis
Are there different rules for Next Step Vouchers (NSVs)	HACG shared that the proposed MTW Activity does not impact HUD's live-in aide rule. The activity allows smaller families to lease 2-bedroom units until a family becomes available
Good meeting. [It] saddens me that residents are not here, but [they] cannot say, "no one told me". Requested a copy of the Plan to "comb through"	The NSV activity has rules that limits the number of NSVs issued and sets a term and time limit conditions for recipients HACG shared that there is a 4:00 p.m. meeting and directed the commenter to the locations of the Plan throughout the city

The Housing Authority of Columbus, Georgia

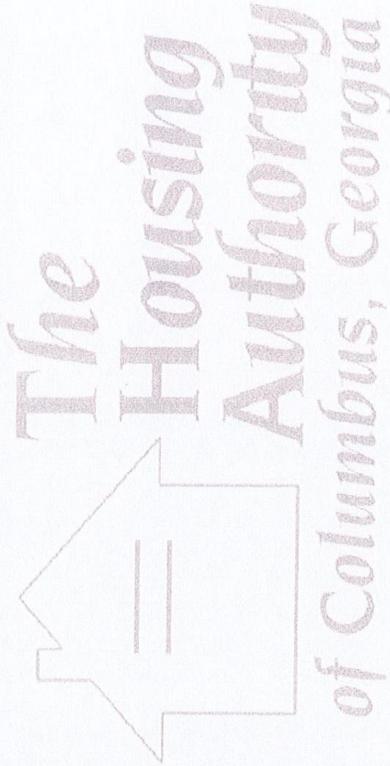
Appendix C

PUBLIC HEARING - MONDAY, MARCH 13, 2017 @ 4:00 p.m.	
Commenter / Comment	HACG's Response
Notification [should be] earlier for residents	HACG will revisit its notification process and timeline. HACG publishes its public meeting schedule in the Ledger-Enquirer and posts flyers in the rental offices
There is not a Resident Council at [Luther C.] Wilson [Homes] or it is inactive	Wilson is a RAD I Rehabilitation Project, which required construction and relocation at the site. Once complete, HACG will assist the 'rise' of a Resident Council at Wilson
Received notification email [today about meeting] - y'all need to start sooner with advertising	HACG will revisit its notification process and timeline. HACG publishes its public meeting schedule in the Ledger-Enquirer and posts flyers in the rental offices
Keep grant going through unification of sites	Due to HACG changes, converting PH units to PBV units, use of LIHTC funding, and similar, HACG is ineligible for grants designed for public housing utilization
Print [2018 Annual MTW] Plan for residents	HACG directs everyone to its website to review/print the Plan. HACG also prints and displays a limited number of hard copies for public consumption
[Is] Columbus Commons on-line? Do BTW (Booker T. Washington) residents still have preference	Columbus Commons is scheduled to be complete August 2017. The rental office may open in May/June and BTW residents have preference, but must meet tax credit criteria
What is going to happen with everything else around Columbus Commons	City Planner in attendance: The City [of Columbus] is requesting an updated Master Plan for the Liberty District. [The Plan] will go to the City Council soon for approval
As a result of the Public Hearings, HACG made its 2018 Plan available in rental offices , while maintaining its availability at the usual public display locations.	

The Housing Authority of Columbus, Georgia

Appendix C

PUBLIC MEETING - WEDNESDAY, MARCH 15, 2017 @ 2:00 p.m.	
Commenter / Comment	HACG's Response
What is going on with the move [at Warren Williams]	Next sites are in the preliminary stages of the conversion process. Architects, LIHTC application help, and similar tasks are underway. Relocation is anticipated for next year
What is going on with the ants	This concern and similar will be reported to HACG grounds and site maintenance staffs



Appendix C

PLAN COMMENTS RECEIVED OUTSIDE OF PUBLIC HEARING OR PUBLIC MEETINGS	
Reviewer (method) Comment	HACG's Response
Wilson Resident (call with Dept. Director): The report is well written; plain, simple and easy to understand	Active listening
Wilson Resident (call with Dept. Director): The report is ACRONYM heavy, but I understand the need for this and a glossary is provided	Active listening
Wilson Resident (call with Dept. Director): If I am understanding correctly, originally HACG was proposing changes in the recertification period, income level and childcare provisions; but due to the change in funding source and their regulations these items were eliminated	Confirmed as correct {HACG utilized LIHTC funding to rehabilitate sites/units to meet RAD conversion requirements}
Wilson Resident (call with Dept. Director): The ROSS Grant ended in 2016? Will HACG be reapplying, seeking another funding source, etc., or is this program just finished?	ROSS is a Public Housing Program and HACG was no longer eligible to apply due to RAD conversion. Other funding sources will be pursued and at a minimum, services [supportive services] based on LIHTC requirements will be provided
Wilson Resident (call with Dept. Director): I saw mention of hiring "Onsite Activity Coordinators" upon completion of ALL renovations/relocations. I would be interested in applying for one of these positions	Active listening
Wilson Resident (call with Dept. Director): Make the availability of materials and meeting dates known earlier. I do not read the Ledger-Enquirer nor am I an internet junkie	Active listening
Wilson Resident (call with Dept. Director): Re-inspection fee? Explain [how it's] for landlords?	Fee [is] to landlords and the fee could not be passed on to the resident [as a result of HACG HQS inspectors making multiple visits to inspect units that fail HQS after the 1st re-inspection (2nd visit) until unit passes HQS. Fee is assessed for each visit

The Housing Authority of Columbus, Georgia

Appendix C

PLAN COMMENTS RECEIVED OUTSIDE OF PUBLIC HEARING OR PUBLIC MEETINGS	
Reviewer (method) Comment	HACG's Response
Chase Resident (in-person with Asst. Housing Manager): What is moving-to-work?	Resident was encouraged to contact HACG's Community Initiatives Department [The MTW Program provides HACG with flexibilities to modify/waive certain HUD rules and regulations governing the Section 8 and Section 9 Rental Assistance Programs. This flexibility allows HACG to research and develop MTW activities designed to meet MTW Statutory Objectives]
Chase Resident (in-person with Asst. Housing Manager): Will I have to move under the MTW Program?	No. The MTW Program does not require you or any resident to move
Chase Resident (in-person with Asst. Housing Manager): I heard Chase is being knocked down, is that because of MTW?	No, plans for Chase are in the beginning phases, so there are several ideas being kicked around. [Chase's rehabilitation and/or redevelopment discussions have been internal for some time due to Chase's age and location. Previously, HACG was limited. The MTW Program simply gives HACG development flexibility. This flexibility has created a "buzz" and no final decision is near
Williams Resident (written comments in site copy): Rehabilitation[,] why other Housing Developments included you have Rehabilitation and Seniors in all development[?] In [MTW] program will they be allowed to collect Grants and Government stipends [sic] or certificates or diplomas in completing the course given or on a volunteer bases [sic] [?] And in completion [sic] of program allowed time to be not present for some type of emergencies, sickness, or death [sic] will be able [to] continue or start over, or there [sic] allotment will change [?]	It appears that this comment is referencing elements of a previous program (HOPE VI Program @ Peabody), where HACG worked with institutions to clear some financial aid defaults that enabled residents to enroll in school. Based on this appearance, the MTW Program has not introduced an activity to address the comments and the institution's policies will prevail

The Housing Authority of Columbus, Georgia

Appendix C

PLAN COMMENTS RECEIVED OUTSIDE OF PUBLIC HEARING OR PUBLIC MEETINGS	
Reviewer (method) Comment	HACG's Response
<p>Williams Resident (written comments in site copy): Supportive Service Program, will someone be train [sic] or be in the field for this position[?] Will data information and daily log of tract [sic] of progress loop-holes correspondance [sic] and daily activities recorded for further potential residences [sic] whom qualify or meet standards to receive these service [sic][?]</p>	<p>The referenced Supportive Services Program in the Plan will primarily provide services based on Low-Income Housing Tax Credit (LIHTC) direction, with little to no case management included. HACG understands this service to include activities and workshops, although referrals will be made as needed. Attendance at activities and workshops will be tracked (but [attendance is] not required)</p>
<p>Williams Resident (written comments in site copy): Calculation of Contribution given from the outside sector will it look at annually or quarterly or maybe ever [sic] 30 to 60 days to be able to continue the process and make your quarter to the contributions[?]</p>	<p>Calculation of Contribution income reported is reviewed annually. Is a very ambitious timeline and unrealistic to attempt to review income more frequently. Households only receiving Contribution Income will not have an interim examination between annual examinations. Also households receiving Contribution Income and any other income source will only receive 1 interim examination between annuals</p>
<p>Williams Resident (written comments in site copy): Cap Childcare Deductions, if a person who is licensed or unlicensed[,] will there be tracting [sic] of services provided to the child[?] [HACG can] have a form for the individual to sign [to] have a paper trail to know if the services are provided [and] monitor the childcare process and routine of childcare services</p>	<p>HACG does not and will not track childcare services. This activity is to cap childcare deductions at the approved DFCS rate in order to prevent fraud. Residents with unusual childcare expenses (expenses above DFCS reimbursement rate) could request an exception to the policy</p>
<p>Farley Assistant Housing Manager: Tiered rent is not being applied for residents at site because of inability to enter a different rental percentage and/or incompatibility of Yardi to calculate a different percentage</p>	<p>HACG administration will need to investigate this challenge</p>

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

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

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

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

\$ \$2,212,993.00 for Fiscal Year 2014 to be referred to under Capital Fund Grant Number GA08P00450114
PHA Tax Identification Number (TIN): On File DUNS Number: On File

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

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

1. The ACC(s) is (are) amended to provide CFP assistance in the amount specified above for development, capital and management activities of PHA projects. This CFP Amendment is a part of the ACC(s).
2. The PHA must carry out all development, capital and management activities in accordance with the United States Housing Act of 1937 (the Act), 24 CFR Part 905 (the Capital Fund Final rule) published at 78 Fed. Reg. 63748 (October 24, 2013), as well as other applicable HUD requirements.
3. The PHA has a HUD-approved Capital Fund Five Year Action Plan and has complied with the requirements for reporting on open grants through the Performance and Evaluation Report. The PHA must comply with 24 CFR 905.300 of the Capital Fund Final rule regarding amendment of the Five Year Action Plan where the PHA proposes a Significant Amendment the Capital Fund Five Year Action Plan.
4. For cases where HUD has approved a Capital Fund Financing Amendment to the ACC, HUD will deduct the payment for amortization scheduled payments from the grant immediately on the effective date of this CFP Amendment. The payment of CFP funds due per the amortization scheduled will be made directly to a designated trustee within 3 days of the due date.
5. Unless otherwise provided, the 24 month time period in which the PHA must obligate this CFP assistance pursuant to section 9(j)(1) of the Act and 48 month time period in which the PHA must expend this CFP assistance pursuant to section 9(j)(5) of the Act starts with the effective date of this CFP amendment (the date on which CFP assistance becomes available to the PHA for obligation). Any additional CFP assistance this FY will start with the same effective date.
6. Subject to the provisions of the ACC(s) and paragraph 3, and to assist in development, capital and management activities, HUD agrees to disburse to the PHA or the designated trustee from time to time as needed up to the amount of the funding assistance specified herein.
7. The PHA shall continue to operate each public housing project as low-income housing in compliance with the ACC(s), as amended, the Act and all HUD regulations for a period of twenty years after the last disbursement of CFP assistance for modernization activities for each public housing project or portion thereof and for a period of forty years after the last distribution of CFP assistance for development activities for each public housing project and for a period of ten years following the last payment of assistance from the Operating Fund to each public housing project.

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

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

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

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

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

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

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

U.S. Department of Housing and Urban Development	PHA (Executive Director or authorized agent)
By: <u>[Signature]</u> Date: <u>MAY 13 2014</u>	By: <u>[Signature]</u> Date: <u>4/8/14</u>
Title: <u>Director</u> <u>Office of Public Housing</u>	Title: <u>[Signature]</u>

Previous versions obsolete

form HUD-52840-A 03/04/2003

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

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

Part I: Summary		Grant Type and Number		FFY of Grant: 2014
PIA Name: Housing Authority of Columbus, Georgia		Capital Fund Program Grant No: GA06P004501014 Replacement Housing Factor Grant No: Date of CFFP:		FFY of Grant Approval: 2014
Type of Grant		Reserve for Disasters/Emergencies		
<input type="checkbox"/> Original Annual Statement		<input type="checkbox"/> Reserve for Disasters/Emergencies		
<input type="checkbox"/> Performance and Evaluation Report for Period Finding:		<input type="checkbox"/> Final Performance and Evaluation Report		
Line	Summary by Development Account	Total Estimated Cost	Revised ¹	Total Actual Cost ¹ Expended
1	Total non-CFP Funds	Original	Obligated	
2	1406 Operations (may not exceed 20% of line 21) ²			
3	1408 Management Improvements			
4	1410 Administration (may not exceed 10% of line 21)			
5	1411 Audit			
6	1415 Liquidated Damages			
7	1430 Fees and Costs			
8	1440 Site Acquisition			
9	1450 Site Improvement			
10	1460 Dwelling Structures			
11	1465.1 Dwelling Equipment—Nonexpendable			
12	1470 Non-dwelling Structures			
13	1475 Non-dwelling Equipment			
14	1485 Demolition			
15	1492 Moving to Work Demonstration	2,212,993	2,212,993	2,161,943
16	1495.1 Relocation Costs			
17	1499 Development Activities ⁴			

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

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

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

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

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

Part II: Supporting Pages		Federal FFY of Grant: 2014				
PHA Name: Housing Authority of Columbus, Georgia		Grant Type and Number Capital Fund Program Grant No: GA06P004501014				
Development Number Name/PHA-Wide Activities		CFPP (Yes/ No): Replacement Housing Factor Grant No:		Total Estimated Cost		Status of Work
General Description of Major Work Categories	Development Account No.	Quantity	Original	Revised ¹	Funds Obligated ²	Funds Expended ²
1492 Moving to Work Demonstration Capital Funds will be expended on the following areas: Physical Improvements, Management Improvements, PHA-Wide Non- Dwelling Structures and Equipment, Administration, Operations, Fees & Costs, and Section 8 Landlord payments. Capital Funds will be expended on costs associated with the Booker T. Washington (BTW) (GA004000402) redevelopment. Phase 1 of the project include, but are not limited to demolition, relocation, consultants, non- dwelling structures and equipment, and other reasonable and necessary costs (see short-term goals and objectives). Capital Funds will be expended on site software and fiber optic cables agency wide.	1492		2,212,993		2,212,993	2,161,943
TOTAL			2,212,993		2,212,993	1,959,147

¹ To be completed for the Performance and Evaluation Report or a Revised Annual Statement
² To be completed for the Performance and Evaluation Report

2015 Capital Fund

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

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

11 MAR 2015

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

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

\$ \$42,025.00 for Fiscal Year 2015 to be referred to under Capital Fund Grant Number GA06R00450115
PHA Tax Identification Number (TIN): On File DUNS Number: On File

Whereas, HUD and the PHA are entering into the CFP Amendment Number 45

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

- The ACC(s) is (are) amended to provide CFP assistance in the amount specified above for development, capital and management activities of PHA projects. This CFP Amendment is a part of the ACC(s).
- The PHA must carry out all development, capital and management activities in accordance with the United States Housing Act of 1937 (the Act), 24 CFR Part 905 (the Capital Fund Final rule) published at 78 Fed. Reg. 63748 (October 24, 2013), as well as other applicable HUD requirements, except that the limitation in section 9(g)(1) of the Act is increased such that the amount of CFP assistance provided for under this CFP amendment only, the PHA may use no more than 25 percent for activities that are eligible under section 9(a) of the Act only if the PHA's HUD-approved Five Year Action Plan provides for such use; however, if the PHA owns or operates less than 250 public housing dwelling units, such PHA may continue to use the full flexibility in section 9(g)(2) of the Act.
- The PHA has a HUD-approved Capital Fund Five Year Action Plan and has complied with the requirements for reporting on open grants through the Performance and Evaluation Report. The PHA must comply with 24 CFR 905.300 of the Capital Fund Final rule regarding amendment of the Five Year Action Plan where the PHA proposes a Significant Amendment to the Capital Fund Five Year Action Plan.
- For cases where HUD has approved a Capital Fund Financing Amendment to the ACC, HUD will deduct the payment for amortization scheduled payments from the grant immediately on the effective date of this CFP Amendment. The payment of CFP funds due per the amortization scheduled will be made directly to a designated trustee within 3 days of the due date.
- Unless otherwise provided, the 24 month time period in which the PHA must obligate this CFP assistance pursuant to section 9(j)(1) of the Act and 48 month time period in which the PHA must expend this CFP assistance pursuant to section 9(j)(5) of the Act starts with the effective date of this CFP amendment (the date on which CFP assistance becomes available to the PHA for obligation). Any additional CFP assistance this FY will start with the same effective date.
- Subject to the provisions of the ACC(s) and paragraph 3, and to assist in development, capital and management activities, HUD agrees to disburse to the PHA or the designated trustee from time to time as needed up to the amount of the funding assistance specified herein.
- The PHA shall continue to operate each public housing project as low-income housing in compliance with the ACC(s), as amended, the Act and all HUD regulations for a period of twenty years after the last disbursement of CFP assistance for modernization activities for each public housing project or portion thereof and for a period of forty years after the last distribution of CFP assistance for development activities for each public housing project and for a period of ten years following the last payment of assistance from the Operating Fund to each public housing project. However, the provisions of Section 7 of the ACC shall remain in effect for so long as HUD determines there is any outstanding indebtedness of the PHA to HUD which arose in connection with any public housing project(s) under the ACC(s) and which is not eligible for forgiveness, and provided further that, no disposition of any project covered by this amendment shall occur unless approved by HUD.
- The PHA will accept all CFP assistance provided for this FY. If the PHA does not comply with any of its obligations under this CFP Amendment and does not have its Annual PHA Plan approved within the period specified by HUD, HUD shall impose such penalties or take such remedial action as provided by law. HUD may direct the PHA to terminate all work described in the Capital Fund Annual Statement of the Annual PHA Plan. In such case, the PHA shall only incur additional costs with HUD approval.
- Implementation or use of funding assistance provided under this CFP Amendment is subject to the attached corrective action order(s). (mark one): Yes No
- The PHA is required to report in the format and frequency established by HUD on all open Capital Fund grants awarded, including information on the installation of energy conservation measures.
- If CFP assistance is provided for activities authorized pursuant to agreements between HUD and the PHA under the Rental Assistance Demonstration Program, the PHA shall follow such applicable statutory authorities and all applicable HUD regulations and requirements. For total conversion of public housing projects, the provisions of Section 7 of the ACC shall remain in effect for so long as HUD determines there is any outstanding indebtedness of the PHA to HUD which arose in connection with any public housing projects(s) under the ACC(s) and which is not eligible for forgiveness, and provided further that, no disposition or conversion of any public housing project covered by these terms and conditions shall occur unless approved by HUD. For partial conversion, the PHA shall continue to operate each non-converted public housing project as low-income housing in accordance with paragraph 7.
- CFP assistance provided as an Emergency grant or a Safety and Security grant shall be subject to a 12 month obligation and 24 month expenditure time period. CFP assistance provided as a Natural Disaster grant shall be subject to a 24 month obligation and 48 month expenditure time period. The start date shall be the date on which such funding becomes available to the PHA for obligation. The PHA must record the Declaration(s) of Trust within 60 days of the effective date or HUD will recapture the funds.

The parties have executed this CFP Amendment, and it will be effective on 4/13/2015. This is the date on which CFP assistance becomes available to the PHA for obligation.

U.S. Department of Housing and Urban Development By: <u>[Signature]</u> Date: <u>APR 13 2015</u> Title: <u>Director</u> <u>Office of Public Housing</u>	PHA (Executive Director or authorized agent) By: <u>[Signature]</u> Date: <u>3/10/15</u> Title: <u>CEO</u>
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Previous Versions obsolete

form HUD-52840-A 03/04/2003

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

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

Part I: Summary		FFY of Grant: 2015 FFY of Grant Approval: 2015	
PHA Name: Housing Authority of Columbus, Georgia		Grant Type and Number Capital Fund Program Grant No. GA06R004501015 Replacement Housing Factor Grant No: Date of CFFP:	
Type of Grant	<input type="checkbox"/> Original Annual Statement <input type="checkbox"/> Performance and Evaluation Report for Period Ending:	<input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Summary by Development Account	<input type="checkbox"/> Revised Annual Statement (revision no:) <input type="checkbox"/> Final Performance and Evaluation Report
Line	Original	Total Estimated Cost Revised ²	Obligated Total Actual Cost ¹ Expended
1	Total non-CFP Funds		
2	1406 Operations (may not exceed 20% of line 21) ³		
3	1408 Management Improvements		
4	1410 Administration (may not exceed 10% of line 21)		
5	1411 Audit		
6	1415 Liquidated Damages		
7	1430 Fees and Costs		
8	1440 Site Acquisition		
9	1450 Site Improvement		
10	1460 Dwelling Structures		
11	1465.1 Dwelling Equipment—Nonexpendable		
12	1470 Non-dwelling Structures		
13	1475 Non-dwelling Equipment		
14	1485 Demolition		
15	1492 Moving to Work Demonstration		
16	1495.1 Relocation Costs		
17	1499 Development Activities ⁴	42,025	42,025

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

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

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

Part I: Summary		FFY of Grant: 2015	
PHA Name: Housing Authority of Columbus, Georgia		FFY of Grant Approval: 2015	
Grant Type and Number Capital Fund Program Grant No: GA06R004501015 Replacement Housing Factor Grant No: Date of CFFP:			
<input type="checkbox"/> Original Annual Statement <input type="checkbox"/> Performance and Evaluation Report for Period Ending:		<input type="checkbox"/> Revised Annual Statement (revision no:) <input type="checkbox"/> Final Performance and Evaluation Report	
Type of Grant <input type="checkbox"/> Reserve for Disasters/Emergencies			
Summary by Development Account		Total Estimated Cost	
Line		Original	Revised ²
18a	1501 Collateralization or Debt Service paid by the PHIA		
18ba	9000 Collateralization or Debt Service paid Via System of Direct Payment		
19	1502 Contingency (may not exceed 8% of line 20)		
20	Amount of Annual Grant: (sum of lines 2 - 19)	42,025	42,025
21	Amount of line 20 Related to LBP Activities		
22	Amount of line 20 Related to Section 504 Activities		
23	Amount of line 20 Related to Security - Soft Costs		
24	Amount of line 20 Related to Security - Hard Costs		
25	Amount of line 20 Related to Energy Conservation Measures		
Signature of Executive Director		Signature of Public Housing Director	
Date		Date	

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

2015 Capital Fund

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

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

31 MAR 2015

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

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

\$ \$429,716.00 for Fiscal Year 2015 to be referred to under Capital Fund Grant Number GA06R00450215
 PHA Tax Identification Number (TIN): On File DUNS Number: On File

Whereas, HUD and the PHA are entering into the CFP Amendment Number 46

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

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

- assistance for development activities for each public housing project and for a period of ten years following the last payment of assistance from the Operating Fund to each public housing project. However, the provisions of Section 7 of the ACC shall remain in effect for so long as HUD determines there is any outstanding indebtedness of the PHA to HUD which arose in connection with any public housing project(s) under the ACC(s) and which is not eligible for forgiveness, and provided further that, no disposition of any project covered by this amendment shall occur unless approved by HUD.
- The PHA will accept all CFP assistance provided for this FY. If the PHA does not comply with any of its obligations under this CFP Amendment and does not have its Annual PHA Plan approved within the period specified by HUD, HUD shall impose such penalties or take such remedial action as provided by law. HUD may direct the PHA to terminate all work described in the Capital Fund Annual Statement of the Annual PHA Plan. In such case, the PHA shall only incur additional costs with HUD approval.
 - Implementation or use of funding assistance provided under this CFP Amendment is subject to the attached corrective action order(s). (mark one): Yes No
 - The PHA is required to report in the format and frequency established by HUD on all open Capital Fund grants awarded, including information on the installation of energy conservation measures.
 - If CFP assistance is provided for activities authorized pursuant to agreements between HUD and the PHA under the Rental Assistance Demonstration Program, the PHA shall follow such applicable statutory authorities and all applicable HUD regulations and requirements. For total conversion of public housing projects, the provisions of Section 7 of the ACC shall remain in effect for so long as HUD determines there is any outstanding indebtedness of the PHA to HUD which arose in connection with any public housing project(s) under the ACC(s) and which is not eligible for forgiveness, and provided further that, no disposition or conversion of any public housing project covered by these terms and conditions shall occur unless approved by HUD. For partial conversion, the PHA shall continue to operate each non-converted public housing project as low-income housing in accordance with paragraph 7.
 - CFP assistance provided as an Emergency grant or a Safety and Security grant shall be subject to a 12 month obligation and 24 month expenditure time period. CFP assistance provided as a Natural Disaster grant shall be subject to a 24 month obligation and 48 month expenditure time period. The start date shall be the date on which such funding becomes available to the PHA for obligation. The PHA must record the Declaration(s) of Trust within 60 days of the effective date or HUD will recapture the funds.

The parties have executed this CFP Amendment, and it will be effective on 4/13/2015. This is the date on which CFP assistance becomes available to the PHA for obligation.

U.S. Department of Housing and Urban Development By: <u>[Signature]</u> Date: <u>APR 13 2015</u> Title: <u>Director</u> <u>Office of Public Housing</u>	PHA (Executive Director or authorized agent) By: <u>[Signature]</u> Date: <u>3/10/15</u> Title: <u>CEO</u>
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Previous versions obsolete Form HUD-52840-A 03/04/2003

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

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

Part I: Summary		FFY of Grant: 2015	
PHA Name: Housing Authority of Columbus, Georgia		FFY of Grant Approval: 2015	
Grant Type and Number			
Capital Fund Program Grant No:GA06R004502015			
Replacement Housing Factor Grant No:			
Date of CFPP:			
Type of Grant	Reserve for Disasters/Emergencies		
<input type="checkbox"/> Original Annual Statement	<input type="checkbox"/> Revised Annual Statement (revision no:)		
<input type="checkbox"/> Performance and Evaluation Report for Period Ending:	<input type="checkbox"/> Final Performance and Evaluation Report		
Line	Summary by Development Account	Total Estimated Cost Revised ²	Total Actual Cost ¹ Expended
1	Total non-CFP Funds		
2	1406 Operations (may not exceed 20% of line 21) ³		
3	1408 Management Improvements		
4	1410 Administration (may not exceed 10% of line 21)		
5	1411 Audit		
6	1415 Liquidated Damages		
7	1430 Fees and Costs		
8	1440 Site Acquisition		
9	1450 Site Improvement		
10	1460 Dwelling Structures		
11	1465.1 Dwelling Equipment—Nonexpendable		
12	1470 Non-dwelling Structures		
13	1475 Non-dwelling Equipment		
14	1485 Demolition		
15	1492 Moving to Work Demonstration		
16	1495.1 Relocation Costs		
17	1499 Development Activities ⁴	429,716	429,716

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

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

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

Part I: Summary		FFY of Grant: 2015 FFY of Grant Approval: 2015	
PHA Name: Housing Authority of Columbus, Georgia	Grant Type and Number Capital Fund Program Grant No.: GA06R004502015 Replacement Housing Factor Grant No: Date of CFPF:		
Type of Grant <input type="checkbox"/> Original Annual Statement <input type="checkbox"/> Performance and Evaluation Report for Period Ending:		<input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Revised Annual Statement (revision no:) <input type="checkbox"/> Final Performance and Evaluation Report	
Line	Summary by Development Account	Total Estimated Cost	Total Actual Cost ¹
		Original	Obligated
18a	1501 Collateralization or Debt Service paid by the PHA		Expended
18ba	9000 Collateralization or Debt Service paid Via System of Direct Payment		
19	1502 Contingency (may not exceed 8% of line 20)		
20	Amount of Annual Grant: (sum of lines 2 - 19)	429,716	
21	Amount of line 20 Related to LBP Activities		429,716
22	Amount of line 20 Related to Section 504 Activities		
23	Amount of line 20 Related to Security - Soft Costs		
24	Amount of line 20 Related to Security - Hard Costs		
25	Amount of line 20 Related to Energy Conservation Measures		
Signature of Executive Director		Signature of Public Housing Director	
Date		Date	

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

2015 Capital Fund

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

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

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

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

\$ 2,231,506.00 for Fiscal Year 2015 to be referred to under Capital Fund Grant Number GA06P00450115 PHA Tax Identification Number (TIN): On File DUNS Number: On File

Whereas, HUD and the PHA are entering into the CFP Amendment Number 44

- Now Therefore, the ACC(s) is (are) amended as follows:
1. The ACC(s) is (are) amended to provide CFP assistance in the amount specified above for development, capital and management activities of PHA projects. This CFP Amendment is a part of the ACC(s).
2. The PHA must carry out all development, capital and management activities in accordance with the United States Housing Act of 1937 (the Act), 24 CFR Part 905 (the Capital Fund Final rule) published at 78 Fed. Reg. 63748 (October 24, 2013), as well as other applicable HUD requirements, except that the limitation in section 9(g)(1) of the Act is increased such that of the amount of CFP assistance provided for under this CFP amendment only, the PHA may use no more than 25 percent for activities that are eligible under section 9(e) of the Act only if the PHA's HUD-approved Five Year Action Plan provides for such use; however, if the PHA owns or operates less than 250 public housing dwelling units, such PHA may continue to use the full flexibility in section 9(g)(2) of the Act.
3. The PHA has a HUD-approved Capital Fund Five Year Action Plan and has complied with the requirements for reporting on open grants through the Performance and Evaluation Report. The PHA must comply with 24 CFR 905.300 of the Capital Fund Final rule regarding amendment of the Five Year Action Plan where the PHA proposes a Significant Amendment to the Capital Fund Five Year Action Plan.
4. For cases where HUD has approved a Capital Fund Financing Amendment to the ACC, HUD will deduct the payment for amortization scheduled payments from the grant immediately on the effective date of this CFP Amendment. The payment of CFP funds due per the amortization schedule will be made directly to a designated trustee within 3 days of the due date.
5. Unless otherwise provided, the 24 month time period in which the PHA must obligate this CFP assistance pursuant to section 9(j)(1) of the Act and 48 month time period in which the PHA must expend this CFP assistance pursuant to section 9(j)(5) of the Act starts with the effective date of this CFP amendment (the date on which CFP assistance becomes available to the PHA for obligation). Any additional CFP assistance this FY will start with the same effective date.
6. Subject to the provisions of the ACC(s) and paragraph 3, and to assist in development, capital and management activities, HUD agrees to disburse to the PHA or the designated trustee from time to time as needed up to the amount of the funding assistance specified herein.
7. The PHA shall continue to operate each public housing project as low-income housing in compliance with the ACC(s), as amended, the Act and all HUD regulations for a period of twenty years after the last disbursement of CFP assistance for modernization activities for each public housing project or portion thereof and for a period of forty years after the last distribution of CFP assistance for development activities for each public housing project and for a period of ten years following the last payment of assistance from the Operating Fund to each public housing project. However, the provisions of Section 7 of the ACC shall remain in effect for so long as HUD determines there is any outstanding indebtedness of the PHA to HUD which arose in connection with any public housing project(s) under the ACC(s) and which is not eligible for forgiveness, and provided further that, no disposition of any project covered by this amendment shall occur unless approved by HUD.
8. The PHA will accept all CFP assistance provided for this FY. If the PHA does not comply with any of its obligations under this CFP Amendment and does not have its Annual PHA Plan approved within the period specified by HUD, HUD shall impose such penalties or take such remedial action as provided by law. HUD may direct the PHA to terminate all work described in the Capital Fund Annual Statement of the Annual PHA Plan. In such case, the PHA shall only incur additional costs with HUD approval.
9. Implementation or use of funding assistance provided under this CFP Amendment is subject to the attached corrective action order(s). (mark one): [] Yes [X] No
10. The PHA is required to report in the format and frequency established by HUD on all open Capital Fund grants awarded, including information on the installation of energy conservation measures.
11. If CFP assistance is provided for activities authorized pursuant to agreements between HUD and the PHA under the Rental Assistance Demonstration Program, the PHA shall follow such applicable statutory authorities and all applicable HUD regulations and requirements. For total conversion of public housing projects, the provisions of Section 7 of the ACC shall remain in effect for so long as HUD determines there is any outstanding indebtedness of the PHA to HUD which arose in connection with any public housing project(s) under the ACC(s) and which is not eligible for forgiveness, and provided further that, no disposition or conversion of any public housing project covered by these terms and conditions shall occur unless approved by HUD. For partial conversion, the PHA shall continue to operate each non-converted public housing project as low-income housing in accordance with paragraph 7.
12. CFP assistance provided as an Emergency grant or a Safety and Security grant shall be subject to a 12 month obligation and 24 month expenditure time period. CFP assistance provided as a Natural Disaster grant shall be subject to a 24 month obligation and 48 month expenditure time period. The start date shall be the date on which such funding becomes available to the PHA for obligation. The PHA must record the Declaration(s) of Trust within 60 days of the effective date or HUD will recapture the funds.

The parties have executed this CFP Amendment, and it will be effective on 4/13/2015. This is the date on which CFP assistance becomes available to the PHA for obligation.

U.S. Department of Housing and Urban Development By: [Signature] Date: APR 13 2015 Title: Director Office of Public Housing PHA (Executive Director or authorized agent) By: [Signature] Date: 3/10/15 Title: CEO

Previous versions obsolete Form HUD-52840-A 03/04/2003

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

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

Part I: Summary							
PHA Name: Housing Authority of Columbus, Georgia		Grant Type and Number Capital Fund Program Grant No: GA06P004501015 Replacement Housing Factor Grant No: Date of CFPF:		FFY of Grant: 2015 FFY of Grant Approval: 2015			
Type of Grant		<input type="checkbox"/> Reserve for Disasters/Emergencies		<input type="checkbox"/> Revised Annual Statement (revision no:)			
<input type="checkbox"/> Original Annual Statement		<input type="checkbox"/> Performance and Evaluation Report for Period Ending:		<input type="checkbox"/> Final Performance and Evaluation Report			
Summary by Development Account		Original		Total Estimated Cost Revised¹		Total Actual Cost¹ Expended	
1	Total non-CFPF Funds						
2	1406 Operations (may not exceed 20% of line 21) ³						
3	1408 Management Improvements						
4	1410 Administration (may not exceed 10% of line 21)						
5	1411 Audit						
6	1415 Liquidated Damages						
7	1430 Fees and Costs						
8	1440 Site Acquisition						
9	1450 Site Improvement						
10	1460 Dwelling Structures						
11	1465.1 Dwelling Equipment—Nonexpendable						
12	1470 Non-dwelling Structures						
13	1472 Non-dwelling Equipment						
14	1485 Demolition						
15	1492 Moving to Work Demonstration						
16	1495.1 Relocation Costs			2,231,506		2,188,572	2,187,117
17	1499 Development Activities ⁴						

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

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

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

Part I - Summary		FFY of Grant: 2015	
PHA Name: Housing Authority of Columbus, Georgia	Grant Type and Number Capital Fund Program Grant No.: GA06P004501015 Replacement Housing Factor Grant No: Date of CFFP:	FFY of Grant Approval: 2015	
<input type="checkbox"/> Original Annual Statement <input type="checkbox"/> Performance and Evaluation Report for Period Ending:		<input type="checkbox"/> Revised Annual Statement (revision no:) <input type="checkbox"/> Final Performance and Evaluation Report	
Type of Grant		Reserve for Disasters/Emergencies	
<input type="checkbox"/> Original Annual Statement <input type="checkbox"/> Performance and Evaluation Report for Period Ending:		<input type="checkbox"/> Revised <input type="checkbox"/> Final Performance and Evaluation Report	
Line	Summary by Development Account	Total Estimated Cost	Total Actual Cost ¹
		Original	Obligated
18a	1501 Collateralization or Debt Service paid by the PHA		
18ba	9000 Collateralization or Debt Service paid Via System of Direct Payment		
19	1502 Contingency (may not exceed 8% of line 20)		
20	Amount of Annual Grant: (sum of lines 2 - 19)	2,231,506	2,188,572
21	Amount of line 20 Related to LBP Activities		2,187,117
22	Amount of line 20 Related to Section 504 Activities		
23	Amount of line 20 Related to Security - Soft Costs		
24	Amount of line 20 Related to Security - Hard Costs		
25	Amount of line 20 Related to Energy Conservation Measures		
Signature of Executive Director		Signature of Public Housing Director	
Date		Date	

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

Part II: Supporting Pages		Federal FFY of Grant: 2015						
PHA Name: Housing Authority of Columbus, Georgia		Grant Type and Number Capital Fund Program Grant No: GA06P004501015						
		CFPP (Ycs/ No): Replacement Housing Factor Grant No:						
Development Number Name/PHA-Wide Activities	General Description of Major Work Categories	Development Account No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised ¹	Funds Obligated ²	Funds Expended ²	
	1492 Moving to Work Demonstration Capital Funds will be expended on the following areas: PHA-Wide Physical Improvements, Site Improvements, Management Improvements, Non-Dwelling Structures and Equipment, Relocation, Administration, Operations, Fees & Costs, and Section 8 Landlord payments. Capital Funds will be expended on costs associated with the Booker T. Washington (BTW) (GA004000402) redevelopment. Phase II of the project include, but are not limited to demolition, relocation, consultants, non-dwelling structures and equipment, and other reasonable and necessary costs (see short-term goals and objectives). Wilson Homes exterior door and window replacement. Cany Homes exterior door and window replacement. Capital Funds will be expended on site software and fiber optic cables agency wide.	1492		2,231,506		2,188,572	2,187,117	In Progress
	TOTAL			2,231,506		2,188,572	2,187,117	

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

Appendix D

2016 Capital Fund

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

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

Whereas, (Public Housing Authority) Housing Authority of the City of Columbus GA004 (herein called the "PHA")
and the United States of America, Secretary of Housing and Urban Development (herein called "HUD") entered into Consolidated Annual Contributions
Contract(s) ACC(s) Number(s) A2384 dated 5/17/1999

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

\$ \$43,604.00 for Fiscal Year 2016 to be referred to under Capital Fund Grant Number GA01RC0450115
PHA Tax Identification Number (TIN): On File DUNS Number: On File

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

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

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

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

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

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

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

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

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

The parties have executed this CFP Amendment, and it will be effective on 4/13/2016. This is the date on which CFP assistance becomes available to the PHA for obligation.

U.S. Department of Housing and Urban Development By _____ Date: _____	PHA (Executive Director or authorized agent) By <u>[Signature]</u> Date: <u>4/13/16</u>
Title _____	Title <u>CEO</u>

Previous versions obsolete

form HUD-52840-A OMB Approval No. 2577-0157 (exp. 01/31/

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

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

Part I: Summary		Grant Type and Number		FFY of Grant: 2016	
PHA Name: Housing Authority of Columbus, Georgia		Capital Fund Program Grant No.: GA01R009450116		FFY of Grant Approval: 2016	
Date of CFFP:		Replacement Housing Factor Grant No.:			
<input type="checkbox"/> Original Annual Statement		<input type="checkbox"/> Reserve for Disasters/Emergencies		<input type="checkbox"/> Revised Annual Statement (revision no:)	
<input checked="" type="checkbox"/> Performance and Evaluation Report for Period Ending:		<input type="checkbox"/> Final Performance and Evaluation Report		<input type="checkbox"/> Final Performance and Evaluation Report	
Summary by Development Account		Total Estimated Cost		Total Actual Cost ¹	
Line		Original	Revised ²	Obligated	Expended
1	Total non-CFF Funds				
2	1406 Operations (may not exceed 20% of line 21) ³				
3	1408 Management Improvements				
4	1410 Administration (may not exceed 10% of line 21)				
5	1411 Audit				
6	1415 Liquidated Damages				
7	1430 Fees and Costs				
8	1440 Site Acquisition				
9	1450 Site Improvement				
10	1460 Dwelling Structures				
11	1465.1 Dwelling Equipment—Nonexpendable				
12	1470 Non-dwelling Structures				
13	1475 Non-dwelling Equipment				
14	1485 Demolition				
15	1492 Moving to Work Demonstration				
16	1495.1 Relocation Costs				
17	1499 Development Activities ⁴	43,694			

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

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

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

Part I: Summary		FFY of Grant: 2016 FFY of Grant Approval: 2016	
PHA Name: Housing Authority of Columbus, Georgia		Grant Type and Number Capital Fund Program Grant No: GA01R00450116 Replacement Housing Factor Grant No: Date of CFFP:	
Type of Grant <input checked="" type="checkbox"/> Original Annual Statement <input type="checkbox"/> Performance and Evaluation Report for Disasters/Emergencies <input type="checkbox"/> Reserve for Disasters/Emergencies		<input type="checkbox"/> Revised Annual Statement (revision no:) <input type="checkbox"/> Final Performance and Evaluation Report	
Summary by Development Account		Total Estimated Cost	
Line		Original	Revised ²
18a	1501 Collateralization or Debt Service paid by the PHA		
18ba	9000 Collateralization or Debt Service paid Via System of Direct Payment		
19	1502 Contingency (may not exceed 8% of line 20)		
20	Amount of Annual Grant: (sum of lines 2 - 19)		
21	Amount of line 20 Related to LBP Activities		43,694
22	Amount of line 20 Related to Section 504 Activities		
23	Amount of line 20 Related to Security - Soft Costs		
24	Amount of line 20 Related to Security - Hard Costs		
25	Amount of line 20 Related to Energy Conservation Measures		
Signature of Executive Director		Signature of Public Housing Director	
Date		Date	

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

Appendix D

2016 Capital Fund

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

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

Whereas, (Public Housing Authority) Housing Authority of the City of Columbus GA004 (herein called the "PHA") and the United States of America, Secretary of Housing and Urban Development (herein called "HUD") entered into Consolidated Annual Contributions Contract(s) ACC(s) Number(s) A2364 dated 5/17/1068

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

\$ \$2,331,481.00 for Fiscal Year 2016 to be referred to under Capital Fund Grant Number GA01P00450118
PHA Tax Identification Number (TIN): On File DUNS Number: On File

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

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

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

- assistance for development activities for each public housing project and for a period of ten years following the last payment of assistance from the Operating Fund to each public housing project. However, the provisions of Section 7 of the ACC shall remain in effect for so long as HUD determines there is any outstanding indebtedness of the PHA to HUD which arose in connection with any public housing project(s) under the ACC(s) and which is not eligible for forgiveness, and provided further that, no disposition of any project covered by this amendment shall occur unless approved by HUD.
8. The PHA will accept all CFP assistance provided for this FY. If the PHA does not comply with any of its obligations under this CFP Amendment and does not have its Annual PHA Plan approved within the period specified by HUD, HUD shall impose such penalties or take such remedial action as provided by law. HUD may direct the PHA to terminate all work described in the Capital Fund Annual Statement of the Annual PHA Plan. In such case, the PHA shall only incur additional costs with HUD approval.
9. Implementation or use of funding assistance provided under this CFP Amendment is subject to the attached corrective action order(s). (mark one): Yes No
10. The PHA is required to report in the format and frequency established by HUD on all open Capital Fund grants awarded, including information on the installation of energy conservation measures.
11. If CFP assistance is provided for activities authorized pursuant to agreements between HUD and the PHA under the Rental Assistance Demonstration Program, the PHA shall follow such applicable statutory authorities and all applicable HUD regulations and requirements. For total conversion of public housing projects, the provisions of Section 7 of the ACC shall remain in effect for so long as HUD determines there is any outstanding indebtedness of the PHA to HUD which arose in connection with any public housing project(s) under the ACC(s) and which is not eligible for forgiveness, and provided further that, no disposition or conversion of any public housing project covered by these terms and conditions shall occur unless approved by HUD. For partial conversion, the PHA shall continue to operate each non-converted public housing project as low-income housing in accordance with paragraph 7.
12. CFP assistance provided as an Emergency grant or a Safety and Security grant shall be subject to a 12 month obligation and 24 month expenditure time period. CFP assistance provided as a Natural Disaster grant shall be subject to a 24 month obligation and 48 month expenditure time period. The start date shall be the date on which such funding becomes available to the PHA for obligation. The PHA must record the Declaration(s) of Trust within 60 days of the effective date or HUD will recapture the funds.

The parties have executed this CFP Amendment, and it will be effective on 4/13/2016. This is the date on which CFP assistance becomes available to the PHA for obligation.

U.S. Department of Housing and Urban Development	PHA (Executive Director or authorized agent)
By _____ Date: _____	By <u>[Signature]</u> Date: <u>4/5/16</u>
Title _____	Title <u>CEO</u>

Previous versions obsolete form HUD-52840-A OMB Approval No. 2577-0167 (exp. 01/31/)

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

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

Part I: Summary		Grant Type and Number		FFY of Grant: 2016	
PHA Name: Housing Authority of Columbus, Georgia		Capital Fund Program Grant No: GA06P004501016 Replacement Housing Factor Grant No: Date of CFFP:		FFY of Grant Approval: 2016	
Type of Grant		Reserve for Disasters/Emergencies		Revised Annual Statement (revision no: 2)	
<input type="checkbox"/> Original Annual Statement		<input type="checkbox"/> Reserve for Disasters/Emergencies		<input checked="" type="checkbox"/> Final Performance and Evaluation Report	
<input type="checkbox"/> Performance and Evaluation Report for Period Ending:		Summary by Development Account		Total Estimated Cost Revised ¹	
Line	Original	Obligated	Total Actual Cost ¹	Expended	
1	Total non-CFFP Funds				
2	1406 Operations (may not exceed 20% of line 21) ³				
3	1408 Management Improvements				
4	1410 Administration (may not exceed 10% of line 21)				
5	1411 Audit				
6	1415 Liquidated Damages				
7	1430 Fees and Costs				
8	1440 Site Acquisition				
9	1450 Site Improvement				
10	1460 Dwelling Structures				
11	1465.1 Dwelling Equipment—Nonexpendable				
12	1470 Non-dwelling Structures				
13	1475 Non-dwelling Equipment				
14	1485 Demolition				
15	1492 Moving to Work Demonstration				
16	1495.1 Relocation Costs				
17	1499 Development Activities ⁴				
		2,331,461	1,681,226	915,417	915,417
		0	650,235	650,235	650,235

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

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form HUD-50075.1 (4/2008)

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

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

Part I: Summary		FFY of Grant: 2016	
PHA Name: Housing Authority of Columbus, Georgia	Grant Type and Number Capital Fund Program Grant No: GA06P004501016 Replacement Housing Factor Grant No: Date of CFFP:	FFY of Grant Approval: 2016	
<input type="checkbox"/> Original Annual Statement <input type="checkbox"/> Performance and Evaluation Report for Period Ending:		<input checked="" type="checkbox"/> Revised Annual Statement (revision no: 1) <input type="checkbox"/> Final Performance and Evaluation Report	
<input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Performance and Evaluation Report for Period Ending:		<input type="checkbox"/> Final Performance and Evaluation Report	
Line	Summary by Development Account	Original	Revised ²
		Total Estimated Cost	
		Total Actual Cost ¹	
18a	1501 Collateralization or Debt Service paid by the PHA		Obligated
18ba	9000 Collateralization or Debt Service paid Via System of Direct Payment		Expended
19	1502 Contingency (may not exceed 8% of line 20)		
20	Amount of Annual Grant: (sum of lines 2 - 19)	2,331,461	1,565,652
21	Amount of line 20 Related to LBP Activities		
22	Amount of line 20 Related to Section 504 Activities		
23	Amount of line 20 Related to Security - Soft Costs		
24	Amount of line 20 Related to Security - Hard Costs		
25	Amount of line 20 Related to Energy Conservation Measures		
Signature of Executive Director		Signature of Public Housing Director	
Date		Date	

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

Part II: Supporting Pages		Federal FFY of Grant: 2016						
PHA Name: Housing Authority of Columbus, Georgia		Grant Type and Number Capital Fund Program Grant No: GA06P004501016 CFPP (Yes/ No): Replacement Housing Factor Grant No:						
Development Number Name/PHA-Wide Activities	General Description of Major Work Categories	Development Account No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised ¹	Funds Obligated ²	Funds Expended ²	
	1492 Moving to Work Demonstration Capital Funds will be expended on the following areas: PHA-Wide Physical Improvements, Site Improvements, Management Improvements, Non-Dwelling Structures and Equipment, Relocation, Administration, Operations, Fees & Costs, and Section 8 Landlord payments. Capital Funds will be expended on costs associated with the project development for the Rental Assistance Demonstration (RAD) properties to include: property condition assessments, environmental reviews and consultants for developing tax credit applications, renovation and improvements to dwelling units and amenities, site improvements to include erosion controlling retaining walls, hazardous material abatement, fiber optic links for information technology, sewer line repair and replacement, and relocation costs. Booker T. Washington (BTW) (GA004000402) redevelopment. Phase II of the project include, demolition, consultants, non-dwelling structures and equipment, and other reasonable and necessary costs. Cnty Homes exterior door and window replacement. Capital Funds will be expended on site software and fiber optic cables agency wide.	1492		2,331,461	1,681,226	915,417	915,417	
	1503 RAD Converted Units	1503		0	650,235	650,235	650,235	
	TOTAL			2,331,461	2,331,462	1,565,652	1,565,652	

