



Atlanta Housing Authority

FY 2017

MTW Annual Plan

For Fiscal Year Beginning July 1, 2016

BOARD APPROVED March 30, 2016

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Vision

Healthy Mixed-Income Communities; Healthy Self-Sufficient Families

Mission

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

Goals

AHA's business model has positioned it to achieve three goals:

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



Guiding Principles

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

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

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Table of Contents

	Message from the Board of Commissioners	
	Message from the President & CEO	
	Background on Moving to Work (MTW)	4
I.	Executive Summary	6
II.	FY 2017 Key Priorities	
	Priority 1: Housing Opportunities & Real Estate Development	8
	Priority 2: Human Development and Supportive Services	19
	Priority 3: Administration	22
III.	MTW Policy Innovations	24

IV. Appendices

Appendix A	MTW Annual Plan Cross-Reference Guides <ul style="list-style-type: none">• AHA Legacy Attachment B Requirements• HUD Form 50900 Attachment B
Appendix B	FY 2017 MTW Plan Resolution & Certifications <ul style="list-style-type: none">• Secretary's Certificate• Resolutions & Exhibits• Certification Regarding Substantive Information Reporting Requirements• Certifications of Compliance with Regulations• Certification of Payments to Influence Federal Transactions• Certification for a Drug Free Workplace• Public Review and Plan Changes
Appendix C	Ongoing Activities <ul style="list-style-type: none">• AHA Benchmarks• MTW Implementation Protocols• Local Asset Management Program
Appendix D	Housing Opportunities <ul style="list-style-type: none">• Households Served Projections• Household Characteristics• Waiting List Characteristics• Units to be Added or Removed• Leasing and Waiting List Information• AHA-Owned, Managed, and Sponsored Communities and Properties• Management Information for Owned/Managed Units at AHA-Owned Residential Communities and Assisted Units at Mixed-Income Communities
Appendix E	Information Required for Conversions Under the Rental Assistance Demonstration (RAD)
Appendix F	Financial Analysis <ul style="list-style-type: none">• Annual Budget – FY 2016• Capital Planning – FY 2017• Combined Statements of Revenue, Expense, & Changes in Net Assets – FY 2015
Appendix G	<i>AHA Amended and Restated Statement of Corporate Policies</i>
Appendix H	HUD Information Reporting Requirement (HUD Form 50900 – Attachment B) Includes AHA Responses to HUD Comments on FY 2017 MTW Plan

Message from the Board of Commissioners

As one of the country's largest public housing authorities, Atlanta Housing Authority (AHA) has changed the look and feel of public housing and works strategically and persistently to better the lives of families in Atlanta.

AHA's Moving to Work (MTW) status plays a critical role in enabling AHA to implement innovative solutions to challenges in our community. For our future and for families that need human development support that are provided with MTW funds, we will continue to protect our MTW status.

Along with a dedicated board of commissioners, I appreciate working with AHA's leadership as we plan and implement strategies to produce more affordable housing and revitalize neighborhoods in the city of Atlanta.



Daniel J. Halpern
Chairman
Board of Commissioners

Message from the President & CEO



Joy W. Fitzgerald
President &
Chief Executive Officer

If luck is where preparation meets opportunity, we are lucky, because Atlanta Housing Authority (AHA) is prepared to create opportunities for families to become self-sufficient and thrive in our Atlanta community.

In 2017, AHA will create more opportunities for our families through several key initiatives.

In October 2015, AHA (as co-applicant with the City of Atlanta) was awarded a \$30 million Choice Neighborhoods Implementation Grant, which will allow us to revitalize the west Atlanta neighborhood where the former University Homes once stood. Work is well underway to transform these neighborhoods. Beyond the housing and real estate, AHA and its partners will help families to obtain workforce training and other services that will facilitate financial self-sufficiency along with access to quality education.

AHA also plans to determine short- and long-term options for redevelopment of the former public housing sites that were demolished between FY 2007 and FY 2010 as part of the Quality of Life Initiative. AHA's vacant land real estate holdings throughout the city of Atlanta will be put to the highest and best use for the benefit of families and the community at large.

Lastly, families with Housing Choice vouchers will continue to receive the necessary and appropriate support to facilitate skills and educational development that can lead to jobs. Using MTW funds, AHA will continue investing in case management and working with partners to eliminate barriers to economic advancement.

Our future is bright, and we have the tools and means to fulfill our vision of healthy mixed-income communities, healthy self-sufficient families. I look forward to sharing the good news of our accomplishments as a community.

Background on Moving to Work

Moving to Work (MTW) is a demonstration program established in 1996 by Congress and administered by the U.S. Department of Housing and Urban Development (HUD), giving certain “high performing” public housing agencies the flexibility to design and test various approaches for (a) facilitating and providing quality affordable housing opportunities in their localities; (b) facilitating opportunities for family success and self-sufficiency; and (c) achieving greater efficiency and effectiveness. AHA received its MTW designation in 2001 and executed its MTW Agreement with HUD on September 23, 2003, the initial period of which was effective from July 1, 2003, through June 30, 2010.

In response to HUD’s decision to expand and extend the demonstration period until June 30, 2018, AHA and HUD negotiated and executed an Amended and Restated MTW Agreement, effective as of November 13, 2008, and further amended by that certain Second Amendment to the Moving to Work Agreement, effective as of January 16, 2009. AHA’s MTW Agreement, as amended and restated is referred herein as the “MTW Agreement.” The Second Amendment (a) reinstates and expands AHA’s ability to invest MTW Funds in certain types of real estate transactions, and (b) reaffirms that AHA’s MTW Funds may be used for MTW Eligible Activities (as defined in the Restated MTW Agreement) and for low-income housing purposes beyond the limitations of Section 8 and Section 9 of the U.S. Housing Act of 1937, as amended (1937 Act). If the MTW Demonstration Program is extended, the MTW Agreement may be automatically extended for additional ten-year periods, subject to HUD’s approval and AHA meeting certain agreed-upon conditions. In December 2015, Congress mandated the extension of the MTW Demonstration Program to June 30, 2028 under the same terms and conditions of AHA’s current agreement. HUD confirmed this extension to AHA in writing on April 14, 2016.

Pursuant to the authority in AHA’s MTW Agreement, AHA has combined its low income operating funds, housing choice voucher funds, and certain capital funds into a single fund (“MTW Single Fund” or “MTW Funds”), which are expended on MTW Eligible Activities as set forth in AHA’s Business Plan.

The MTW Agreement provides substantial statutory and regulatory relief under the 1937 Act and reaffirms, extends, and expands the statutory and regulatory relief provided under AHA’s original MTW Agreement. The MTW Agreement forms the statutory and regulatory framework for AHA to carry out its work during the term of the MTW Agreement, as it may be extended, as set forth in AHA’s Business Plan and as amended from time to time. The statutory goals set forth by Congress are the following:

Goal 1: Reduce costs and achieve greater cost effectiveness in Federal expenditures.

Goal 2: Give incentives to families with children where the head of household is working, seeking work, or is preparing for work by participating in job training, educational programs, or programs that assist people to obtain employment and become economically self-sufficient.

Goal 3: Increase housing choices for low-income families.



In 2004, AHA submitted to HUD its first long-term strategic Business Plan, using this new statutory and regulatory framework (herein referred to as the “Business Plan”). AHA’s Business Plan and its subsequent MTW annual plans on a cumulative basis outline AHA’s priority projects, activities, and initiatives to be conducted during each fiscal year. Fiscal Year 2017 represents AHA’s fourteenth year of participation in the MTW Demonstration.

AHA's Communities and Programs

Housing Opportunities				
<i>AHA-Owned Residential Communities</i>	<i>AHA-Sponsored Mixed-Use, Mixed-Income Communities</i>	<i>Project Based Rental Assistance (PBRA) Program</i>	<i>Supportive Housing Program</i>	<i>Housing Choice Tenant-Based Voucher Program</i>
<p>As a result of advancing AHA's Strategic Revitalization Program, since 1994, AHA has demolished or disposed of 30 obsolete public housing projects. AHA owns 13 public housing assisted residential properties, including 11 senior high-rise communities and two small family communities. Residents of the high-rise communities are elderly (age 62 or older), near elderly (age 55-61), and non-elderly disabled adults.</p> <p>AHA contracts with professional private Property Managers-Developers (PMDs) to manage each community comprehensively and in accordance with AHA's goals, policies, and priorities. In addition to day-to-day operations and capital improvements, the PMDs also provide on-site human development services that support AHA's Aging Well strategy to promote independent living at the high-rise communities. As developers, the PMDs will work with AHA to redevelop and modernize these properties.</p>	<p>AHA's Strategic Revitalization Program makes it possible for private-sector real estate developers to create market-rate quality mixed-use, mixed-income communities on the sites of former public housing projects.</p> <p>The Master Plans for each site envision transformational community-building by:</p> <ul style="list-style-type: none"> • Developing new mixed-income rental and for-sale units – both affordable and market-rate, • Incorporating great recreational facilities and amenities, • Creating green space and parks, • Providing quality retail and commercial activities, and • Being child-centered and supporting the creation of high-performing neighborhood schools (pre-K to high school). 	<p>Using MTW flexibility, in 2005 AHA created and implemented the Project Based Rental Assistance Program (PBRA or MTW PBRA) – a financial incentive and financing tool to encourage private sector developers and owners of quality multi-family developments to reserve a percentage of their units as affordable. Upon completion of the property, AHA and the owner enter into a PBRA agreement for a period up to 15 years to provide rental assistance to eligible residents in the PBRA units covered by AHA's commitment. AHA's form of PBRA agreement streamlines program activities through site-based administration delivered at the property level.</p> <p>The PBRA Program has successfully increased the long-term availability of high-quality affordable units to low-income families in Atlanta.</p>	<p>The purpose of supportive housing is to provide at-risk populations – who are often homeless or soon-to-be homeless – with a stable housing arrangement that includes intensive, often specialized support services that address individual needs. At-risk populations include homeless individuals and families, persons with physical, mental or developmental disabilities, military veterans, families separated due to the lack of housing, youth aging out of foster care, and other target groups that need quality, affordable housing.</p> <p>For AHA, Supportive Housing holds a meaningful place among the housing opportunities we make available to low-income families and individuals.</p>	<p>AHA's Housing Choice Tenant-Based Voucher Program offers families the greatest opportunity to exercise personal responsibility and preference in selecting where they live.</p> <p>Using an AHA voucher, families can identify quality housing anywhere in the city of Atlanta with the assurance that they will not have to pay more than 30 percent of adjusted income towards their rent and utilities. Families may also choose to use their AHA voucher to move outside the city limits of Atlanta.</p> <p>Property owners/landlords of single family homes and apartments manage the properties and enter into landlord/tenant relationships with the families.</p>
Human Development Services				
<p>Through its network of strategic partners, service providers, and community stakeholders, AHA facilitates the provision of supportive services – including employment services and training, educational and literacy services, disability services, life skills training, homeownership counseling, childcare, mental health services, and senior supportive services – leading to economic self-sufficiency for families, progression to the mainstream, and healthy aging-in-place for elderly and disabled households.</p>				

Section I.

Executive Summary

Over the past 20 years, AHA has focused on deconcentrating poverty, facilitating family self-sufficiency, and developing affordable housing opportunities beyond public housing. AHA now serves more than 21,779 low-income and extremely low-income families through a wide variety of programs. During FY 2017, AHA will focus on opening the doors wider to create more housing opportunities for families, individuals, and special needs populations such as veterans, older adults, and persons with disabilities.

AHA leverages all its assets – land, MTW flexibility, know-how, access to funds, partnerships, and goodwill – to develop its real estate holdings in the creation of mixed-use, mixed-income communities on the sites of former public housing projects. These longer-term investments will provide affordable housing now and for generations. In the nearer term, AHA will increase its utilization of Housing Choice vouchers (both tenant-based and project-based under its MTW-based PBRA program) to provide more affordable housing opportunities for low-income families on the waiting list. To fulfill its vision of “healthy mixed-income communities; healthy self-sufficient families,” AHA must address both the longer-range and shorter-range housing approaches.

In the provision of affordable housing AHA will also continue to invest in services that foster the growth and stability of families. It is clear that families living in poverty need community support and services to become economically self-sufficient. In order for families to grow, services must address the needs of the entire family. For work-able adults, workforce development, educational, and training resources are critical. For children educational supports and afterschool programs enable academic achievement. Services that stimulate engagement and active aging can lead to greater quality of life for elderly and disabled individuals. AHA has seen the effectiveness of focused support activities and will continue to invest in these human development services.

AHA holistically operates the entire agency under its MTW authority. Utilizing its MTW flexibilities and leveraging grants and other sources of funding, AHA will target major initiatives and activities for FY 2017 in the following primary areas.

1. Housing Opportunities & Real Estate Development

- a. Advance the master plans for AHA-sponsored mixed-use, mixed-income communities.
- b. Implement Choice Neighborhoods Implementation Grant and other related activities.
- c. Advance longer-term real estate development strategy and strategic real estate transactions.
- d. Implement conversions (or reformulation demonstrations) for public housing units in AHA-Owned Residential Communities and AHA-sponsored mixed-use, mixed-income communities.
- e. Increase housing opportunities using project-based and tenant-based voucher programs.

2. Human Development and Supportive Services

- a. Increase work/program participation of Housing Choice families.
- b. Expand supportive housing and homelessness initiatives.

3. Administration

- a. Reengineer Housing Choice to facilitate lease-up success.
- b. Continue Cash Management strategy to optimize receipt and use of Federal funds.

To create a forum for meaningful public input and feedback, these priorities are described in greater detail in Section II.

Section II.

FY 2017 Enterprise Priorities

AHA continues to exercise its full MTW flexibility and will continue its focus on implementing major initiatives that further availability of and access to affordable housing and support services. The FY 2017 priority activities are described and aligned with the MTW statutory goals. Other ongoing activities previously approved by HUD and operationalized by AHA are described in Section IV – Appendices C and H. AHA, in its entirety, will focus on these key priorities that align with AHA's goals and objectives and that are designed to address unique local challenges.

Please Note: Many of these multi-year activities were identified and approved by HUD in previous AHA MTW Annual Plans and constitute "ongoing activities" under its MTW authority. Pursuant to AHA's MTW Agreement with HUD and unless otherwise noted, AHA is not requesting additional HUD approval of the ongoing activities described in this FY 2017 plan. The progression of activities described herein will be implemented under HUD's previous approvals and/or do not require HUD's approval as an MTW activity, e.g., submitting an application for a Choice Neighborhoods Implementation Grant.

Priority		AHA Goals / MTW Statutory Goals		
		1	2	3
1	Housing Opportunities & Real Estate Development	*		*
2	Human Development and Supportive Services	*	*	*
3	Administration			*

Legend:

AHA's Goal 1: Quality Living Environments = MTW Statutory Goal: Increase housing choices for low-income families

AHA's Goal 2: Self-Sufficiency = MTW Statutory Goal: Give incentives to families with children where the head of household is working, seeking work, or is preparing for work by participating in job training, educational programs, or programs that assist people to obtain employment and become economically self-sufficient

AHA's Goal 3: Economic Viability = MTW Statutory Goal: Reduce costs and achieve greater cost effectiveness in Federal expenditures

Priority 1:

Housing Opportunities & Real Estate Development

FY 2017 FOCUS: Expand and preserve housing opportunities while facilitating development of new mixed-income communities.

In FY 2017, AHA will continue to expand housing opportunities using its various real estate initiatives, public/private partnerships and resources, and MTW flexibility to increase households served and create healthy sustainable communities. AHA will continue to build-out and invest in its 16 master-planned mixed-use, mixed-income communities consistent with approved master plans and will initiate new mixed-income, mixed-use development opportunities on AHA-owned land utilizing private sector development partners.

Consistent with its previous conversion (reformulation) of subsidy at Centennial Place – the first of its master-planned, mixed-use, mixed-income communities – AHA will continue to explore the conversion of HUD-funded public housing subsidy to a Section 8-based funding platform via the use of AHA’s MTW-based Project Based Rental Assistance program (PBRA) or otherwise, including HUD’s Rental Assistance Demonstration (RAD) option. AHA will also continue to use its PBRA program to incent private-sector developers and owners to develop or rehabilitate quality rental communities that include affordable units.



In the eleven senior high-rises and two family properties owned by AHA, the contracted property managers-developers (PMDs) are exploring approaches to finance the rehabilitation of those properties, including conversion of HUD-funded public housing subsidy under HUD’s RAD program.

AHA understands the importance of affirmatively furthering fair housing through strategies that create housing opportunities for low-income families in neighborhoods with low poverty and low minority concentrations. Such neighborhoods, known as Areas of Opportunity, typically have high-performing schools, access to healthcare and transportation, quality retail, parks and other amenities. Demographically, an Area of Opportunity, as defined by AHA, is a census tract with a poverty rate of less than or equal to 20 percent of the total population in the census tract and a minority rate of less than or equal to 50 percent of the total population in the census tract. AHA’s core mission of providing quality affordable housing in amenity-rich, mixed-income communities supports affordable housing strategies in Areas of Opportunity.

As explained later in this Plan, AHA will facilitate affordable housing in Areas of Opportunity through its PBRA program by issuing a separate competitive solicitation for proposals from qualified owners and developers of affordable housing in Areas of Opportunity. By design, the PBRA program and new initiatives in the Housing Choice voucher program are meant to attract and incent developers and property owners to make available more affordable housing throughout the city, while creating fair housing choices for families.

A. Advance master plans for mixed-use, mixed-income communities.

Since 1995 on land owned by AHA, AHA and its private sector partners have successfully created quality, mixed-use, mixed-income communities with an economic impact exceeding \$2 billion. Based on the market conditions and the strength of the real estate and financial markets, AHA and its development partners will continue to engage in real estate activities and advance the community sustainability aspects of the master plans. These strategies are intended to ensure the long-term sustainability and stability of the communities, and the families' progress toward self-sufficiency. Most of these additional aspects will be developed using non-HUD funds.

In support of these communities, AHA has acquired a number of parcels of improved and unimproved real estate in surrounding neighborhoods undergoing revitalization or planned for revitalization. In FY 2017, AHA and its development partners will continue to advance the development plans through repurposing and development of these properties to align with the respective master plans and may seek funding to support these development activities.

Subject to funding availability and in furtherance of the master plans and long-term community sustainability, AHA will continue to engage in acquisition activity during FY 2017. In addition to property acquisitions, AHA may be engaged in negotiations of land transactions with a number of entities to further support its revitalization efforts at the communities listed below in Table 1 and in Sections 1B and 1C (A complete listing of properties owned by AHA is included in Appendix D, Table 6.).

Elements of the approved master plans will be advanced during FY 2017 subject to market demand, financial feasibility, funding availability, and conditions in the financial and real estate markets. The revitalization activities planned for implementation during FY 2017 are described below in Table 1 and in Sections 1B and 1C.

Table 1: Revitalization Activities Planned for FY 2017

Auburn Pointe (Grady Homes Revitalization, includes the revitalization of Antoine Graves Highrise and Antoine Graves Annex) <i>Grady Redevelopment, LLC: Integral Development, LLC, Urban Realty Partners, LLC</i>
<ul style="list-style-type: none">• Support the redevelopment of the properties acquired by AHA or its affiliate(s) through the disposition of land for redevelopment that furthers the Auburn Pointe master plan and stabilizes the community.• Continue to remediate and explore the adaptive re-use of the historic structure at 20 Hilliard Street. If a financially feasible alternative cannot be achieved, AHA may dispose of the property.• Complete the disposition of 1.77 acres of land to the City of Atlanta to construct a natatorium recreational center.• Explore potential disposition of AHA or affiliate-owned land for development opportunities to the procured development partner or an affiliate thereof in furtherance of the master plan. Activities may include the installation of public improvements, and the development of an additional phase of rental and/or for-sale housing.• Update the master plan and may explore updates to revitalization plan.
Capitol Gateway (Capitol Homes Revitalization) <i>Capitol Gateway, LLC: Integral Development, LLC, Urban Realty Partners, LLC</i>
<ul style="list-style-type: none">• Explore potential disposition to the procured development partner or an affiliate thereof of AHA or affiliate-owned land for development opportunities in furtherance of the master plan. Activities may include the installation of public improvements, and the development of an additional phase of rental and/or for-sale housing.• Update the master plan and may explore updates to revitalization plan as needed.

The Villages at Carver (Carver Homes Revitalization)*Carver Redevelopment, LLC: Integral Development, LLC, H.J. Russell and Company*

- Explore potential disposition to the procured development partner or an affiliate thereof of land -owned by AHA and land acquired by AHA or its affiliate(s) for development opportunities including retail and homeownership in furtherance of the master plan.
- Update the master plan and may explore updates to revitalization plan.
- Promote public school improvements and early childhood learning centers in partnership with Integral, H.J. Russell, YMCA and foundation stakeholders.

Centennial Place (Techwood/Clark Howell Revitalization)*Integral Partnership of Atlanta: The Integral Group, LLC, McCormack Baron Salazar*

- Explore potential disposition of AHA or affiliate-owned land and structures to the procured development partner or an affiliate thereof for development opportunities in furtherance of the master plan, to include (i) the disposition and repurposing of the historic Cupola Building for housing development and (ii) the installation of public improvements and disposition of the Centennial Place North parcel in support of housing development.
- May explore updates to revitalization plan based on revised master plan.
- Continue to explore opportunities within the master plan area to further long-term sustainability.
- Reformulation Demonstration: With allocation of Low Income Housing Tax Credits (LIHTC), continue the rehabilitation of Phases I, II, and III utilizing an allocation of LIHTC. May submit application for LIHTCs for redevelopment of Phase IV.
- Maintain active involvement in the repositioning of Centennial Place School into a premier grades K-8 STEAM (Science, Technology, Engineering, Arts, and Mathematics) school supported by a top-rated Cradle-K program. AHA is a member of the school's Governing Board and its operating committees as well as a landlord, development partner, and community stakeholder.
- To facilitate this major school and community revitalization effort, AHA may enable the sub-lease of a portion of its property, along with certain use-easement rights, to be used for temporary accommodations until the new permanent facilities are completed in approximately three years. Additionally, AHA may dispose of land currently used by Centennial Place School for green space under an easement to allow for permanent improvements to be made.

CollegeTown at West End (Harris Homes Revitalization, includes John O. Chiles main building and John O. Chiles Annex)*Harris Redevelopment, LLC: Integral Development, LLC, Real Estate Strategies, LLC*

- Explore potential disposition of AHA or affiliate-owned land to the procured development partner or an affiliate thereof for development opportunities in furtherance of the master plan, and the development of additional phase(s) of rental and/or for-sale housing.
- Explore potential disposition of AHA-owned land for development of an urban garden with an educational center and access to healthy food to benefit the community.
- Update the master plan and may explore updates to revitalization plan.
- Promote public school improvements and invest in early childhood learning centers in partnership with Atlanta Public Schools, YMCA, and other stakeholders.

Mechanicsville (McDaniel Glenn Revitalization)*McDaniel Glenn Revitalization, LLC: Columbia Residential, RHA, SUMMECH*

- Continue development of 75 scattered-site affordable rent-to-own units, including 26 homes on AHA-owned land that closed in FY2016.
- May explore updates to revitalization plan based on revised master plan.
- Promote public school improvements and early childhood learning centers in partnership with stakeholders.

West Highlands at Heman E. Perry Boulevard (Perry Homes Revitalization)
Perry Housing Redevelopment, LLC: Columbia Residential, Brock Built

- Continue with public improvements and disposition of AHA-owned land to the procured development partner or an affiliate thereof for future development of for-sale homes.
- Explore the disposition of land acquired by AHA or its affiliates(s) for future development in support of the master plan.
- Dispose of approximately 7 acres of land within West Highlands for the public benefit of the West Highlands community through a land donation to the Atlanta Public Schools System (APS) for purposes of a permanent site for the development and operation of the charter school at West Highlands or such other Atlanta Public Schools school as may succeed the charter school.
- Explore potential disposition of AHA-owned land to the Homeowner Association for non-housing purposes including (i) the development and operation of a community center and (ii) long-term management of greenspace throughout the West Highlands community.
- Update the master plan and may explore updates to revitalization plan.

AHA will explore alternative funding options for the ongoing revitalization activities including, as appropriate, any sites of former public housing (as listed in Appendix D, Table 6 of this Plan). These options may include, but are not limited to, a variety of public and private sources such as MTW funds, Replacement Housing Factor funds, and Choice Neighborhoods Planning and/or Implementation grants.

Homeownership Down Payment Assistance Program

With the exception of West Highlands (Perry Homes Revitalization), the planned on-site single-family home development activity under the various master plans has been delayed due to the local real estate market conditions. AHA will continue to provide down payment assistance at West Highlands to eligible homebuyers who earn up to 80 percent of Area Median Income (AMI) and desire to purchase affordable homes that are constructed within this master-planned community as funds are available.

As homeownership phases begin in other master-planned, mixed-income developments and the neighborhoods that surround them, AHA will continue advancing its homeownership goals by providing down payment assistance to eligible low to moderate income first-time homebuyers who earn up to 80 percent of AMI. Down payment assistance serves as a good approach to allow affordable homebuyers to enter a recovering Atlanta real estate market at a time when mortgage interest rates are at historic lows, thus increasing affordable homeownership opportunities.

Additionally, to leverage other state and local down payment assistance programs and available funds, AHA has expanded and will continue to expand its down payment assistance programs throughout the city of Atlanta as funds are available.

B. Implement Choice Neighborhoods Implementation Grant and other related activities.

University Choice Neighborhood

On September 28, 2015, AHA and the City of Atlanta were awarded \$30 million from HUD as part of a 2014 Choice Neighborhoods Implementation Grant (CNIG). These funds will be utilized to redevelop the former University Homes public housing site and to revitalize the three surrounding neighborhoods of Ashview Heights, Atlanta University Center Neighborhood, and Vine City (collectively referred to as the University Choice Neighborhood or UCN). AHA (Applicant and People Implementation Entity), MBS-Integral UCNI, LLC (Housing Implementation Entity), the City of Atlanta (co-Applicant), Invest Atlanta (Neighborhood Implementation Entity), the United Way of Greater Atlanta (Principal Education Partner) are working in

concert with the Atlanta University Center Consortium, Atlanta Public Schools, Arthur M. Blank Family Foundation, community partners, former residents of University Homes and community residents to develop programs and partnerships to improve the health, education and economic outcomes of the former residents of University Homes, residents of the revitalized site, and residents of the UCN.

AHA intends to initiate activities included in the Choice Neighborhoods Transformation Plan submitted as part of the CNIG and incorporated into the CNIG Agreement with HUD related to Housing, Neighborhood and People components of the grant. The implementation of these activities may be enhanced by leveraging AHA's MTW flexibility, and AHA may submit regulatory waiver requests to HUD as contemplated under the terms of the CNIG Agreement with HUD.

In accordance with the grant application and Notice of Funds Availability, AHA intends to expend MTW reserve funds, Replacement Housing Factor Funds, program income and other sources of funds towards the transformation of the University Choice Neighborhood and towards the accomplishment of the housing, people and neighborhood strategies, all in accordance with the expenditure categories and relevant activities called for under the Neighborhood Transformation Plan.

Presently contemplated CNIG activities include:

- Continuation of all activities associated with the Choice Neighborhoods Implementation Grant related to the redevelopment of University Homes and three surrounding neighborhoods - as awarded by HUD on September 28, 2015.
- Continued implementation of the housing component of the UCN Implementation Grant Transformation Plan, AHA will work with its Housing Implementation Entity, MBS Integral UCNI, LLC (members: Integral Development and McCormack Baron Salazar).
 - All activities to support the development of an on-site multifamily rental phase 3 (Ashley I) to be carried out by a member of the Housing Implementation Entity including submission of a Low Income Housing Tax Credit or tax-exempt bond application, predevelopment work, public improvements, disposition of AHA-owned and acquired land, and development.
 - All activities to support the development of an on-site multifamily rental phase 4 (Ashley II) to be carried out by a member of the Housing Implementation Entity including submission of a Low Income Housing Tax Credit, tax-exempt bond or New Market Tax Credit application, predevelopment work, public improvements, disposition of AHA-owned land, and development.
 - Continue all activities to support the adaptive reuse of the historic Roosevelt Administration Building to be carried out by a member of the Housing Implementation Entity including predevelopment work, disposition of AHA-owned land and structure, redevelopment - for use as the Choice Neighborhoods office, retail, other commercial/office space and community meeting space.
 - Update the master plan as required including updates to revitalization plan.
 - Explore activities associated with public improvements and predevelopment associated with phase 5, Homeownership.
 - Continue to explore acquisitions and other opportunities within the master plan area to further long-term sustainability.
- Disposition of AHA-owned land in Vine City for below fair market value for the construction of affordable single family for-sale homes for City of Atlanta police officers in partnership with the Arthur M. Blank Family Foundation, Pulte Homes, and the Atlanta Police Foundation in support of public safety initiatives in the CN area.

- Acquisition of land inside the UCN boundaries for the development of an off-site rental housing phase in support of neighborhood stabilization; all activities to support the development of the off-site phase to be carried out by a member of the Housing Implementation Entity including disposition of land and pre-development work. Submission of a tax-exempt bond application and development.
- Acquisition of land and demolition of structures by AHA or its affiliate(s) throughout the UCN for future greenspace, mixed-income housing, and neighborhood development; acquisitions may include relocation in accordance with the requirements of the Uniform Relocation Act.
- In partnership with the City of Atlanta Police Department, provision of funding for code enforcement and demolition of vacant structures in support of UCN neighborhood stabilization.
- Submission of a Community Development Block Grant application to the City of Atlanta to support code enforcement and demolition of vacant structures.
- As part of the Critical Community Improvement Plan incorporated into the UCN Transformation Plan, investment of funds to support the development of a community facility to serve the UCN, affordable housing development, addition of greenspace, urban farming, healthy living programs, measures to enhance and recognize historic significance of the area, and enhancement of pedestrian connectivity.
- Exploration of potential disposition of land owned by AHA or one of its affiliate(s) in Vine City for development opportunities consistent with the CNIG and Critical Community Improvement Plan.
- Investment in services to support families, including coaching and counseling, health and wellness, job readiness and employment, and education programming to support a quality cradle-to-career education in the UCN.
- Continuation of activities to support community and stakeholder engagement to build capacity and increase participation in the UCN.

Future Choice Neighborhoods Implementation Grant Application Submission: Englewood Manor

AHA may explore the feasibility of applying for a Choice Neighborhoods Implementation Grant to support the revitalization of Englewood Manor, a 21.9-acre site demolished as part of AHA's Quality of Life Initiative in 2009. For further details and plans, see Table 2: *Revitalization Activities Planned for Quality of Life Initiative (QLI) Sites in FY 2017*.

Future Choice Neighborhoods Planning Grant Application: AHA Quality of Life Initiative Sites

AHA may explore the feasibility of applying for Choice Neighborhoods Planning Grants in FY 2017 to support the revitalization of the Hollywood Courts and Bowen Homes sites, both of which were demolished as part of AHA's Quality of Life Initiative. For further details and plans, see Table 2: *Revitalization Activities Planned for Quality of Life Initiative (QLI) Sites in FY 2017*.

C. Advance longer-term real estate development strategy and strategic real estate transactions.

During FY 2016 AHA has worked with a real estate consultant to analyze the site conditions, market conditions, and financial feasibility to determine short- and long-term opportunities for redevelopment of the former public housing sites that were demolished between FY 2007 and FY 2010, referred to as the Quality of Life Initiative (QLI). The comprehensive real estate strategy is designed to determine the relative value and opportunities for development of AHA's vacant land real estate holdings throughout the city of Atlanta and to ensure that AHA's land holdings are put to the "highest and best use" to the benefit of families and the community at large. (For a complete listing of AHA's real estate holdings, see Appendix D, Table 6.)

The revitalization activities associated with the QLI sites proposed for implementation during FY 2017 are described below in Table 2.

Table 2: Revitalization Activities Planned for Quality of Life Initiative (QLI) Sites in FY 2017

QLI Site	Planned Activities
Herndon Homes	<ul style="list-style-type: none"> • In collaboration with the procured private sector development partner, implement activities associated with Revitalization Agreement and master planning/community stakeholder engagement in order to finalize the master plan. • Explore a potential land swap with neighboring property owners in furtherance of the master plan, which may also include a disposition of land. • Explore activities associated with public improvements, submission of a Low Income Housing Tax Credit or tax-exempt bond application, development and disposition of AHA-owned land and land acquired by AHA or its affiliate(s) in support of the first phase of development. • Continue to explore acquisitions and other opportunities within the master plan area to further long-term sustainability. • Promote public school improvements and early childhood learning centers in partnership with stakeholders.
Bankhead Courts	<ul style="list-style-type: none"> • In furtherance of AHA's objectives to increase its holdings of land more suitable for housing or mixed-use development including housing, implement the disposition of the northerly portion of the site via a land swap transaction between AHA and the City of Atlanta. • Explore the option to acquire excess swap property from the City, thus increasing the contiguous acreage of the swap property. AHA will pay the City for the fair market value of such excess swap property utilizing MTW funds or other available funding sources. • Explore the option of disposing of the southern portion of the site via a land sale with the proceeds to be utilized to further the needs of low-income families.
Englewood Manor	<ul style="list-style-type: none"> • Issue a Request for Qualifications (RFQ) for a private sector development partner to redevelop AHA-owned land and land that might be acquired by AHA or its affiliate(s). • In collaboration with the procured private sector development partner, implement activities associated with the Revitalization Agreement and master planning/community stakeholder engagement in order to finalize the master plan. • Conduct master planning with adjacent land owners, which may result in exploring a potential land swap with neighboring property owners and partnerships in furtherance of the master plan, which may include a disposition of land. • Explore activities associated with public improvements, submission of a tax-exempt bond or Low Income Housing Tax Credit application, development and disposition of AHA-owned and acquired land in support of the first phase of development.

QLI Site	Planned Activities
	<ul style="list-style-type: none"> • Continue to explore acquisitions and other opportunities within the master plan area to further long-term sustainability. • Promote public school improvements and early childhood learning centers in partnership with stakeholders.
U-Rescue Villa / 311 North Avenue	<ul style="list-style-type: none"> • Issue a Request for Qualifications (RFQ) for a private sector development partner to redevelop the balance of the western portion of U-Rescue Villa (AHA-owned land) and land acquired by AHA or its affiliate(s) (311 North Avenue). • In collaboration with the procured private sector development partner, implement activities associated with the Revitalization Agreement and master planning/community stakeholder engagement in order to finalize the master plan and a process for developing collaborative, community-focused plans for revitalizing the site. • Explore activities associated with public improvements, submission of a Low Income Housing Tax Credit or tax-exempt bond application, development and disposition of AHA-owned land and land acquired by AHA or its affiliate(s) in support of the first phase of development. • Continue to explore acquisitions and other opportunities within the master plan area to further long-term sustainability.
Other QLI sites: Bowen Homes, Gilbert Gardens Annex, Hollywood Courts, Jonesboro North and South, Leila Valley, and Thomasville Heights,	<ul style="list-style-type: none"> • At this time, these QLI sites are not currently planned for redevelopment and may require disposition actions to implement short-term options until such time as it is financially feasible to redevelop the properties. These short-term uses include community gardens, urban farming, and uses in support of public purposes by the City of Atlanta, Atlanta Public Schools, and community stakeholders. Long-term options including land swaps or sales. AHA will continue to explore acquisitions and other opportunities within the area to further long-term sustainability.

For all real estate holdings (including the QLI sites), AHA reserves the right to engage in the following activities during FY 2017:

- Engage or participate in land transactions (including acquisitions, sale, dispositions, and swaps) to support the future revitalization of AHA-owned vacant land or neighborhood stabilization properties that support the development of affordable housing and mixed-use, mixed-income development.
 - AHA will explore disposition of land through ground lease for community purposes such as urban gardens and / or fee simple sale of the following properties in the 30315 zip code area: 951 Boulevard; 865 Grant Terrace, 0 Fern Avenue.
- For sites not planned for redevelopment, implement short- and long-term options (that may include disposition, sales, and swaps) including community gardens, urban farming, and uses in support of the City of Atlanta, Atlanta Public Schools and community stakeholders until such time as it is financially feasible to redevelop the properties.
- Enter into negotiations with Invest Atlanta for the swap or disposition of land parcels to support Invest Atlanta's Economic Development strategy, which includes providing jobs for low-income families.
- Where sites are not suitable for residential development, AHA may consider a land swap or disposition of land where proceeds shall be used for the benefit of low-income families.

- AHA may enter into negotiations with the City of Atlanta for the swap or disposition of land parcels to facilitate the City's community development and neighborhood revitalization initiatives that provide benefit to low-income families.
- Explore the option of issuing Requests for Qualifications for private sector development partners for other AHA-owned QLI former public housing sites, subject to market demand, financial feasibility, funding availability, and conditions in the financial and real estate markets.
- AHA will explore alternative funding options for the ongoing revitalization activities including, as appropriate, any sites of former public housing (as listed in Appendix D, Table 6 of this Plan). These options may include, but are not limited to, a variety of public and private sources such as MTW funds, Replacement Housing Factor funds, and Choice Neighborhoods Planning and/or Implementation grants.

D. Implement conversions (or reformulation demonstration) for public housing units in AHA-Owned Residential Communities and AHA-sponsored mixed-use, mixed-income communities.

Reformulation Demonstration and Conversions at AHA-Sponsored Mixed-Income Communities

On November 2, 2012, HUD approved AHA's proposal to pilot AHA's Reformulation Demonstration Program at Centennial Place under the auspices of its MTW Agreement. Of the 738 residential units in four development phases, 301 units receive public housing operating subsidy pursuant to Section 9 of the U.S. Housing Act of 1937, as amended (the Act). During FY 2015, under the Reformulation Demonstration Program, all 301 units were converted from Section 9 public housing assistance to AHA's Project Based Rental Assistance (PBRA) as designed and implemented by AHA using its MTW flexibility. On April 23, 2013, AHA received additional Housing Choice voucher funding, which will be used as part of the PBRA funding to replace the public housing operating subsidy upon conversion. In FY 2016, AHA's developer partner received Low Income Housing Tax Credits for Phase II. Phase IV will be the subject of a tax credit application in a future fiscal year.

During FY 2017, AHA will continue with its implementation of the reformulation program at Centennial Place while exploring reformulation/conversion strategies that will improve long-term financial sustainability and preserve public and private investments in its other 15 mixed-income rental communities, as anticipated in and pursuant to AHA's MTW Agreement.

Table 3: Planned Conversions/Reformulation Activities by Community Type

	2015	2016	2017
AHA-Sponsored Mixed-Income Communities	<ul style="list-style-type: none"> • Centennial Place III (received tax credit allocation) 	<ul style="list-style-type: none"> • Castleberry I 	<ul style="list-style-type: none"> • Castleberry II • Villages of East Lake I & II • Villages at Carver
AHA-Owned Residential Communities	<ul style="list-style-type: none"> • Juniper and Tenth Highrise (received tax credit allocation) 	<ul style="list-style-type: none"> • Piedmont Road Highrise 	<ul style="list-style-type: none"> • Hightower Manor Highrise • Cosby Spear Highrise • Peachtree Road Highrise

Conversions at AHA-Owned Residential Communities

For the 13 AHA-Owned Residential Communities, AHA utilizes third-party professional property management firms to handle comprehensive site-based management in accordance with AHA's goals, policies, and financial resources. AHA uses its MTW flexibility to supplement the costs of operations and preserve the real estate and the human development services programming for the seniors and families in these communities.

Per the terms of their agreements with AHA, the Property Manager-Developer (PMD) partners – The Integral Group, The Michaels Organization, and Columbia Residential – have begun creating development plans to attract private funding for updating and modernizing the properties. These plans may include exploring demonstration programs to convert the subsidy from Section 9 to Section 8 and timelines for redevelopment, modernization, and conversion based on funding, market conditions, and feasibility. During FY 2015, AHA and the PMDs completed the Green Physical Needs Assessments for 100 percent of the AHA-Owned Residential Communities to determine the long-term strategy for redevelopment and modernization of the properties. Notwithstanding AHA's continuing implementation of its HUD-approved Reformulation Demonstration Program, AHA may support a PMD's desire to undertake a conversion project under HUD's Rental Assistance Demonstration (RAD) as an option for converting subsidy funding at one or more of these properties.

During FY 2016, AHA amended its FY 2016 Moving to Work (MTW) Plan pursuant to HUD's approval of AHA's application for conversion of Juniper & Tenth Highrise under HUD's RAD, and in anticipation of HUD's approval under RAD of AHA's waitlisted application for conversion of Piedmont Road Highrise. As a result, AHA will be converting the public housing-assisted units at both properties to Project Based Vouchers (PBV) under the RAD guidelines. In the event that a conversion of Piedmont Road Highrise under RAD cannot be accomplished in a timely manner due to this application being on the RAD waiting list, AHA may seek to convert this property using its MTW Reformulation approach. AHA is currently seeking a waiver from HUD that would authorize AHA to administer the resident rights, participation, waiting list, and grievance procedures at properties converted under RAD in accordance with the policies and procedures currently practiced by AHA under its MTW-authorized Project Based Rental Assistance program (MTW PBRA). AHA's MTW PBRA is similar to HUD's PBV program under RAD, but differs in certain procedural and policy areas.

During FY 2017, AHA plans to begin the conversion process for Hightower Manor Highrise, Cosby Spear Highrise, and Peachtree Road Highrise (see Table 3) using RAD, if available. If HUD does not have enough RAD capacity, then AHA will initiate activities needed to begin conversions under AHA's MTW-approved Reformulation approach, which utilizes HUD's voluntary conversion and disposition processes. Additionally, AHA plans to begin the conversion process using RAD or Reformulation for property conversions for the balance of the AHA-Owned Residential Communities: Barge Road Highrise, Cheshire Bridge Road Highrise, East Lake Highrise, Georgia Avenue Highrise, Marian Road Highrise, Marietta Road Highrise, Martin Street Plaza, and Westminster.

See Appendix E for required details for RAD Applications as per HUD guidelines.

Elimination of Flat Rents (Proposed MTW Activity)

In anticipation of future conversions and to provide greater alignment between affordable housing programs, AHA proposes to eliminate flat rents from its public housing communities. Flat renters would be transitioned to the standard income-adjusted rents in which a household pays 30 percent of their income towards rent and utilities.

There are compelling reasons to implement this policy. Few households – 1.3 percent – utilize this option. Because households that utilize flat rents tend to be higher income households, income-adjusted rents are more consistent with HUD's emphasis on creating greater housing opportunities for those most in need. As conversions from Section 9 to Section 8 funding using AHA's MTW PBRA program are completed, eventually all households will pay income-adjusted rents. Additionally, HUD guidance introduced in 2014

has created a greater administrative burden on AHA and its Property Managers-Developers to adjust and track the flat rents each year for very few households.

In accordance with its MTW Agreement, AHA will conduct an impact analysis as part of its annual report. Based on a preliminary assessment of current incomes of flat renters combined with the new HUD-mandated flat rent annual adjustments, AHA anticipates limited impacts to the preponderance of affected households. This activity is further described in Appendix H3.

E. Increase housing opportunities using project-based and tenant-based voucher programs.

Housing Choice Tenant-Based Voucher Program

During FY 2015, AHA opened its waiting list and began pulling from the 2015 waiting list. AHA expects to continue pulling from and exhaust the 2015 waiting list in FY 2017 with a goal of housing 800 new families, subject to funding availability. AHA expects to open the Housing Choice waiting list in FY 2017 and create a new waiting list. AHA is exploring the use of a system of local preferences in conjunction with the opening of the waiting list.

AHA Project Based Rental Assistance (PBRA)

Utilizing AHA's MTW flexibility and strategic application of MTW funds, AHA designed and implemented its own PBRA program to expand the availability of affordable housing throughout Atlanta. Under AHA's MTW PBRA program and through a competitive process, AHA solicits private developers and owners interested in reserving a percentage of their multi-family rental units for low-income families for up to 15 years. Commitments for PBRA may be extended after the initial multi-year term, provided that the owner is in compliance with the PBRA Agreement and other related conditions. AHA will continue to use its MTW PBRA to expand the availability of quality affordable housing in healthy, mixed-income communities.

In FY 2017, AHA will issue a Request for Proposals (RFP) under AHA's MTW PBRA program seeking proposals from qualified owners and developers to provide housing in Areas of Opportunity. AHA defines an Area of Opportunity as a census tract with a poverty rate of less than or equal to 20 percent of the total population in the census tract and a minority rate of less than or equal to 50 percent of the total population in the census tract. Such areas may be located within AHA's jurisdiction in the city of Atlanta or within AHA's ten-mile extra-jurisdictional boundary outside of the city. For proposed developments located in an Area of Opportunity, AHA will approve reasonable rents, based on a third-party market study, up to the maximum submarket payment standards under the Housing Choice tenant-based voucher program. Rents in Areas of Opportunity will not be affected by AHA's rent cap of 60 percent of Area Median Income Rent Levels for PBRA proposals located outside of such areas.

To broaden its use of MTW flexibility and further implement its policies for special needs populations, AHA may solicit, through a competitive process, additional proposals from developers and owners of supportive housing targeted for homeless families, individuals, and youth; persons with mental health or developmental disabilities; veterans; and other at-risk populations.

Table 4: New PBRA Communities and Units Projected for FY 2017

Community	Number of new PBRA units
Reynoldstown Senior Residences	26
The Remington	160
The Veranda at Groveway	31

Priority 2:

Human Development and Supportive Services

FY 2017 FOCUS: Continue to increase the number of Housing Choice households that are compliant with AHA's Work/Program Requirement and expand homelessness programs.

AHA's outcome-based human development services focus on its strategic role in breaking the cycle of intergenerational poverty. Through cradle-to-college education strategies and workforce development initiatives, AHA facilitates families' moves toward self-sufficiency, while supporting elderly and disabled residents to lead active and healthy lives. Farther along the housing continuum, AHA continues to expand its role in addressing the needs of families that are homeless or at risk of homelessness.

A. Increase work/program participation by Housing Choice families

A hallmark of AHA's success has been the implementation of AHA's work/program requirement, which applies to all non-elderly and non-disabled adults in all AHA programs. AHA continues to believe strongly in the value, dignity, and economic independence that work provides.

A strong indication of the impact of mixed-income environments is that 96 percent of AHA-assisted households with Target Adults¹ in AHA-Sponsored Mixed-Income Communities, and 95 percent of households in PBRA Communities were in compliance with AHA's work/program requirement. By contrast, in FY 2013, only 37 percent of Housing Choice households were in compliance.

Because the primary paths to self-sufficiency are work and education, in FY 2014, AHA began implementing its Human Development Services strategy to assist families in the Housing Choice Voucher Program with achieving compliance with the work/program requirement within 12 months in order to maintain their housing assistance.

Non-compliant households are subdivided into two categories: progressing and non-compliant.

- Progressing households are households in which all Target Adults are engaged in a minimum of 15 hours per week of work, training, and/or school. These households are encouraged to continue improvements and are not referred for human development services as long as they maintain this status.
- Non-compliant households are households in which Target Adults are not working or meeting any of the work/program requirements.

In FY 2014, AHA began utilizing an expanded Human Development Services staff (including two Family Self-Sufficiency Program funded coordinators) to assess the specific needs of the whole family in support of Target Adults transitioning to the workforce.

Recognizing that chronic unemployment may be related to long-term, complex barriers, AHA refers the families "most in need" to contracted service providers that specialize in particular issues. (See Table 5

Work/Program Requirement

As a condition of receiving the housing subsidy:

(a) **one** non-elderly (18 to 61 years old), non-disabled **adult** household member must maintain continuous **full-time employment** (at least 30 hours per week)

and

(b) **all other** non-elderly, non-disabled **household members** must also maintain employment with a minimum of 30 hours per week or **participate in a combination of school, job training and/or part-time employment.**

¹ Target Adults are non-elderly, non-disabled persons, 18 – 61 years of age, who are subject to the work/program requirement.

below.) AHA staff provide service coordination, monitor the family's progress, and provide guidance for up to 12 months.

Table 5: Contracted Service Providers for Human Development Services

Contracted Service Providers	Services Provided
Atlanta Workforce Development Agency	<ul style="list-style-type: none"> • Job Placement • GED Preparation • Job Training and Certifications
Boys and Girls Clubs of Metro Atlanta	<ul style="list-style-type: none"> • After-School Programming
Center for Working Families	<ul style="list-style-type: none"> • Job Placement for Long-term Unemployed
Literacy Action	<ul style="list-style-type: none"> • GED Preparation • Adult Literacy
Meals on Wheels Atlanta	<ul style="list-style-type: none"> • Adult Day Care Services
Mercy Care Services	<ul style="list-style-type: none"> • Therapeutic Services
Urban League of Greater Atlanta	<ul style="list-style-type: none"> • GED Preparation and Adult Literacy • Expungement and Job Placement • Job Placement for Long-term Unemployed • Vocational Counseling Services

For families whose reasons for unemployment may be related to other issues, such as job skills development or access to quality affordable child care, AHA has expanded its Service Provider Network to include 126 community organizations that address a broad spectrum of support services, including services that address the needs of senior and disabled household members. AHA staff also conduct resource briefings and workshops on topics such as résumé writing and how to enter the Georgia's state child care lottery.

As AHA has expanded its Service Provider Network, it has sought ways both to broaden the services provided and to deepen the relationships beyond simply referring families. Based on the needs assessments completed in FY 2015, AHA has identified extended educational activities with key partners. Specifically, AHA has identified that young adults ages 18 to 25 often are unprepared to enter the workforce. Many have not completed high school and may be unable to obtain a GED or other certification because of literacy or other learning deficiencies. Remedial education resources are necessary to prepare them to enter the workforce or further their education. AHA is working closely with its partners – Literacy Action, Atlanta Workforce Development Agency, and Urban League – to address the needs of these young adults.

Since inception of the program in February 2014, AHA has seen the effectiveness of this human development services approach, with nearly 700 families becoming compliant or progressing. AHA will continue to advance the strategy in FY 2017.

B. Expand supportive housing and homelessness initiatives.

In support of citywide and nationwide efforts to reduce and prevent homelessness, AHA will continue to use its MTW flexibility and funds to explore various rent reforms and additional homelessness initiatives and pilots. AHA will also continue to collaborate with the United Way of Greater Atlanta, the City of Atlanta Continuum of Care (CoC), the U.S. Department of Veterans Affairs, HUD, Georgia Division of Family and Children Services, and various state and local entities to address the housing needs of various at-risk populations.

- In FY 2014, AHA became the first housing authority to utilize the Homeless Management Information System (HMIS), which was used initially for the HUD-VASH program. In FY 2017, AHA will expand its use of HMIS for other supportive housing programs in alignment with the City of Atlanta's CoC coordinated assessment system.
- AHA will continue implementing with the City of Atlanta's CoC the tenant-based supportive housing pilot referred to as "Flow." AHA has committed to provide up to 100 additional vouchers for individuals and families that successfully "graduate" from a permanent supportive housing or transitional housing community into stable housing with light-touch supportive services.
- Working with the United Way of Greater Atlanta, AHA will continue piloting a Short-Term Housing Assistance program to prevent homelessness and to support rapid re-housing of families dealing with temporary setbacks.
- In FY 2016, AHA signed an Intergovernmental Agreement with the Georgia Department of Behavioral Health and Developmental Disabilities (DBHDD) for its Georgia Housing Voucher Program (GHVP). GHVP was developed as part of Georgia's response to the 2010 Settlement Agreement between the State of Georgia and the Department of Justice. The Olmstead Settlement stemmed from the 1999 US Supreme Court decision in *Olmstead v L.C.*, which held that people with disabilities have the right to live in the least restrictive, most integrated settings, and created a mandate for states to develop comprehensive plans to end unnecessary institutionalization of people with disabilities. Under the terms of the settlement, Georgia has placed over 2,000 individuals with persistent mental or developmental disabilities in supportive housing using GHVP. With the partnership, housing assistance is "converted" from GHVP to Housing Choice vouchers. This conversion helps the State to leverage mainstream resources and frees-up funds for housing other recipients or those that would not qualify for Housing Choice vouchers. The State continues to provide supportive services for families after the conversion.
- AHA utilized all 240 Veterans Affairs Supportive Housing (VASH) Program tenant-based vouchers in FY 2016. During FY 2017, AHA may seek additional VASH vouchers, which can also be project-based under AHA's PBRA program.
- AHA will continue exploring opportunities to use Medicaid funds to cover services in an assisted-living setting. AHA will also continue exploring the use of Medicaid and other programs to provide funding to support housing and supportive services for persons with mental or developmental disabilities at The Gardens at CollegeTown (formerly the John O. Chiles Annex building).

Next Step Youth Self-Sufficiency Program (Proposed MTW Activity)

Working with the Georgia Department of Family and Children Services, AHA is proposing a new MTW activity referred to as "Next Step" to provide vouchers for foster care youth ages 18 to 23 that "age" out of foster care and are working with the state's Independent Living Program. The purpose of the voucher is to help the aged-out foster youth stabilize their living situation, avoid becoming homeless, and move toward self-sufficiency. This program is further described in Appendix H3.

Priority 3:

Administration

FY 2017 FOCUS: Optimize Housing Choice processes to improve cycle-times and manage finances within HUD cash management guidelines.

A. Reengineer Housing Choice to facilitate lease-up success.

In the interests of families and as stewards of federal funds, AHA has strived to build long-term relationships with landlords that want to provide quality affordable housing. Despite opening and pulling from its waiting list in 2015 and 2016, AHA has seen voucher holders struggle to find available, appropriately sized units in Atlanta that meet AHA's Enhanced Inspections Standards. In turn, AHA has faced tough negotiations with landlords seeking rents that keep pace with a rising market.

In response to a tight real estate market, AHA has explored several approaches to increase availability of inventory and market the Housing Choice program. These approaches are designed to balance the differences between multi-family properties and single family properties, and the differences between new landlords and tenured, experienced landlords with a reliable track record. AHA has also continued to re-examine operating policies and modify them where appropriate to align with private sector business practices and expectations of property owners and to eliminate administrative burdens that hamper lease-up times.

For example, working with its Landlord Advisory Group during FY 2016, AHA re-examined its abatement policy and implemented an approach that incentivizes responsible landlords that promptly address unit repairs and maintenance, while appropriately penalizing and withholding Housing Assistance Payments to landlords with units that fail inspections and destabilize families.

Below are examples of activities AHA has implemented or plans to implement to ensure successful lease-up of Housing Choice applicants and participants.

- **Marketing Plan** – AHA has increased its outreach and marketing to large multi-family property owners and current property owners that own other non-participating properties. The marketing campaign will focus on raising awareness of the benefits of working with AHA, debunking the myths about assisted families, and educating the prospective property owners on how the program works. AHA will continue to collaborate with the City of Atlanta, Invest Atlanta, Atlanta Apartment Association, and the Atlanta Real Estate Collaborative to engage more property owners throughout the city.
- **Unit Incentive Fees** (Inspection First-Time Pass Bonus for Single Family Units) – Using savings from abatements, AHA will make one-time incentive payments to landlords each time their units pass on the initial inspection on the first attempt and they subsequently lease their units to Housing Choice applicants and participants under new contracts. AHA is launching a four-month pilot during FY 2016.
- **Leasing Incentive Fees** – AHA began offering Leasing Incentive Fees to landlords on behalf of applicants that turn in a Request for Tenancy Approval (RTA) within 30 days of voucher issuance. Leasing Incentive Fees are non-reimbursable and defray the costs of application fees and security deposits. AHA will also offer New Contract Incentives for Single Family Homes.
- **Streamlined AHA Enhanced Inspections Standards** – AHA reviewed and streamlined its Enhanced Inspections Standards to better align with private rental market practices and reduce administrative burden, where feasible. For example, AHA eliminated the requirement for landlords to provide gas certifications at the initial inspection. Gas certifications are only required at the inspector's discretion, such as when a gas appliance is not accessible. AHA also revised its Site & Vicinity standard to make the determination clearer for landlords.

- **Expedited Lease-up at High-Performing Multifamily Properties** – AHA will continue to implement its program allowing high-performing multifamily properties scoring 97 or greater on AHA's comprehensive property assessments, to conduct self-certification inspections signed by the participant and the landlord, and expedited processing of the housing assistance contracts and lease addendums. AHA conducts quality control inspections on a percentage of these units on an annual basis. The implementation of this program has reduced the lease-up cycle time for these properties from an average 25 days to 5 – 7 days.
- **Self-Certification Inspections at Multi-family Properties** – In FY 2016, AHA began allowing multi-family properties scoring 87 or greater on its comprehensive property assessments to conduct self-certification inspections signed by the participant and the landlord. AHA will conduct follow-up inspections on these units within 45 – 60 days following lease-up.
- **Rent Determination** – AHA will continue to implement enhancements to its rent determination process, offering fixed-rate boosts on units for major system upgrades, and allowing landlords to submit rent comparables including leases for comparable units and certain multiple listing service rents
- **Applicant/Participant Education** – AHA will implement an educational program that better equips applicants and participants with information that helps them identify and secure quality housing, especially in high opportunity areas.
- **Updated Sub-Market Payment Standards** – AHA currently uses its own payment standards for seven submarkets. These payment standards were introduced in 2007. In FY 2016, AHA contracted with a nationally recognized consultant to conduct a rental market study. The consultant identified the need for new payment standards and more sub-markets to more closely reflect market dynamics. AHA expects to roll-out new payment standards in FY 2017.

During FY 2017, AHA will continue to streamline its internal business processes and systems with the goal of ensuring successful lease-ups, stabilizing families, and expanding partnerships with landlords.

B. Continue Cash Management strategy.

As an MTW agency, AHA's financial management practices enable use of its MTW Single Fund dollars for investment opportunities in both traditional affordable housing programs and innovative programs that strengthen community partnerships and support neighborhood stabilization throughout the city of Atlanta.

AHA has taken a strategic and operational approach toward compliance with HUD's Cash Management requirements. Cash Management is a HUD-mandated practice with the ultimate goal of improving control over timing of receipts of funding and disbursement methods, and maximizing return (or yield) on temporary surplus funds at housing authorities. AHA practices a streamlined approach to managing MTW funds, adhering to HUD outlined controls while employing business practices that leverage established AHA working relationships and maintain accessibility of adequate funds for our operational needs.

Furthermore, as an MTW Agency, AHA is uniquely positioned to use innovative strategies to ensure our long-term financial sustainability. Our MTW status affords AHA the fiduciary responsibility to actively seek new and innovative sources of revenue for our agency. This includes pursuing competitive grant opportunities and the ability to engage in entrepreneurial opportunities to generate new sources of revenue. This approach leverages an optimal mix of AHA's strategic, operational, and subject matter expertise and capabilities into creating compelling grant applications leading to successful awards, or into providing services that generate revenue to augment funding for our various affordable housing programs.

Ultimately, AHA will continue to deliver execution of a cash management strategy and process that informs agency executive decision-making with respect to finding new and innovative sources of funds, establishing appropriate Federal funding levels, and tracking the timely expenditure, commitment, and obligation of budgeted dollars.

Section III.

MTW Policy Innovations

As an MTW agency, AHA has developed and implemented innovative strategies and created policy documents to capture MTW policy innovations. Policies that AHA is proposing for implementation are included in its MTW Annual Plan. AHA policies are effective only after approval by the AHA Board of Commissioners who, in doing so, authorize the president and chief executive officer to execute and provide administrative direction in the implementation of those policies through standard operating procedures and guidelines. For a detailed description of key innovations or reforms that AHA has implemented as a result of its participation in the MTW Demonstration, see AHA's *FY 2015 MTW Annual Report* at www.atlantahousing.org.

As part of the submission of this Plan, AHA is submitting the *Amended and Restated Statement of Corporate Policies* ("Statement of Corporate Policies") in Appendix G. AHA's key policy document contains policies for all AHA programs. With the updated and clarified language in this document, AHA has determined that these policies sufficiently allow AHA to implement its mission in the coming fiscal year. If it is determined that additional policy changes are necessary, AHA will follow the appropriate protocols to seek approval from the AHA Board of Commissioners.

Innovations Implemented under AHA's MTW Agreement

Under the MTW Agreement, AHA has strategically implemented most housing policy reforms across all programs. This consistency serves multiple purposes: One, families can expect to rise to the same standards that AHA believes lead to self-sufficiency. Two, AHA can align its values and goals with contract terms in partner agreements with developers, owner entities, and service providers. Three, AHA gains economies from systematic implementation across the enterprise and by minimizing redundancy, overhead, and system changes.

- **Use of MTW Funds** to support MTW Eligible Activities (as defined in the MTW Agreement) including, but not limited to, development and/or preservation of mixed-income communities in partnership with private owners and developers; support for human development services to facilitate family self-sufficiency and housing stability; and preservation and operation of public housing communities.
- **Local Housing Policy Reforms** that promote resident accountability, responsibility, and self-sufficiency, and help stabilize the amount that low-income households pay for rent and utilities.
- **Housing Choice Voucher Program** designed and implemented with the goals of mainstreaming families and facilitating progressive "choices" of housing opportunities in economically integrated neighborhoods, with better quality-of-life amenities.
- **Expanding Housing Opportunities** and the availability of affordable housing seamlessly in mixed-income communities and neighborhoods using market principles and approaches in administering the subsidy and landlord/tenant relations.
- **Human Development** services, initiatives, and programs that further promote family self-sufficiency, independent living, and aging in place.
- **Work/Program Requirement** that, as an AHA-wide work requirement, applies to all non-elderly and non-disabled adults in all AHA programs.
- **Economic Viability** and organization-level operational enhancements that improve the efficiency of AHA's financial and business operations.

Table of Contents

FY 2017 Annual Plan Appendices

Appendix A	MTW Annual Plan Cross-Reference Guides <ul style="list-style-type: none">• AHA Legacy Attachment B Requirements• HUD Form 50900 Attachment B
Appendix B	FY 2017 MTW Plan Resolution & Certifications <ul style="list-style-type: none">• Secretary's Certificate• Resolutions & Exhibits• Certification Regarding Substantive Information Reporting Requirements• Certifications of Compliance with Regulations• Certification of Payments to Influence Federal Transactions• Certification for a Drug Free Workplace• Public Review and Plan Changes
Appendix C	Ongoing Activities <ul style="list-style-type: none">• AHA Benchmarks• MTW Implementation Protocols• Local Asset Management Program
Appendix D	Housing Opportunities <ul style="list-style-type: none">• Households Served Projections• Household Characteristics• Waiting List Characteristics• Units to be Added or Removed• Leasing and Waiting List Information• AHA-Owned, Managed, and Sponsored Communities and Properties• Management Information for Owned/Managed Units at AHA-Owned Residential Communities and Assisted Units at Mixed-Income Communities
Appendix E	Information Required for Conversions Under the Rental Assistance Demonstration (RAD)
Appendix F	Financial Analysis <ul style="list-style-type: none">• Annual Budget – FY 2016• Capital Planning – FY 2017• Combined Statements of Revenue, Expense, & Changes in Net Assets – FY 2015
Appendix G	<i>AHA Amended and Restated Statement of Corporate Policies</i>
Appendix H	HUD Information Reporting Requirement (HUD Form 50900 – Attachment B) <ul style="list-style-type: none">• HUD Form 50900• AHA's Proposed and Approved MTW Activities

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1. AHA Legacy Attachment B Requirements

Source: Legacy Attachment B, AHA - Elements for the Annual MTW Plan and Annual MTW Report

Reference: AHA's Amended and Restated Moving to Work Agreement, January 16, 2009

Description: The following table outlines AHA's MTW reporting Requirements per AHA's MTW Agreement. Cross-references are provided specifying the location within the MTW Annual Plan, where the item can be found.

Annual Plan Element	Location in FY 2017 MTW Plan
I. Households Served	
A. Number and characteristics of households served at beginning of period, by: - unit size - family type (family vs. elderly or disabled) - income group (<30; 30-50; 50-80; >80 AMI) - housing type (LRPH, leased, other) - race & ethnicity	Appendix D: Housing Opportunities
B. Identify number and characteristics of households on waiting lists (all housing types). Discuss waiting list issues and proposed actions	Appendix D: Housing Opportunities
C. Number projected to be served at end of period	Appendix D: Housing Opportunities
D. Narrative discussion/explanation of change	
II. Occupancy Policies	
A. Statement of policies governing eligibility, selection, admissions, assignment, and occupancy of families, including the admissions policy under section 16(a)(3)(B) for deconcentration of lower-income families	Appendix G: <i>AHA Amended and Restated Statement of Corporate Policies</i>
B. Statement of Rent Policy	
III. Changes in the Housing Stock	
A. Number of units in inventory at beginning of period by program (LRPH, leased, other)	Appendix D: Housing Opportunities
B. Projected number at end of period by program	Public Housing inventory is reported to HUD through HUD's Inventory Management System (IMS)/ PIH Information Center (PIC) system. Housing Choice voucher leasing information is submitted through the Voucher Management System (VMS).
IV. Sources and Amounts of Funding	
A. Identify/discuss all sources and amounts of funding included in consolidated budget statement	Appendix F: Financial Analysis
B. Identify/discuss sources, amounts, and planned uses of special purpose funds outside the consolidated budget (e.g., DEP)	
C. Consolidated Budget Statement	

1. AHA Legacy Attachment B Requirements

Appendix A
2 of 8

Annual Plan Element	Location in FY 2017 MTW Plan
V. Uses of Funds	
A. Previous year expenditures by line item	Appendix F: Financial Analysis
B. Planned expenditures by line item	
C. Description of proposed activities/investments by line item/explanation of change from previously approved plan	
D. Reserve balance at beginning of year; discuss adequacy of reserves	
VI. Capital Planning	
A. Describe major capital needs and projects, estimated costs, and proposed timetables	Appendix F: Financial Analysis
B. Identify planned expenditures	
C. Demolition and disposition requests, if planned.	Appendix D: Housing Opportunities
D. Homeownership activities, if any.	Section II. 2017 Priorities
VII. Management Information for Owned/Managed Units	
A. Vacancy (Occupancy) Rates	Appendix D: Housing Opportunities
1. Occupancy rates by property beginning of period	
2. Narrative: issues and proposed action	
3. Target rates by property at end of period	
B. Rent Collections	
1. Rents uncollected (%) beginning of period	
2. Narrative: issues and proposed actions	
3. Target % at end of period	
C. Work Orders	
1. Response rates beginning of period <ul style="list-style-type: none">% emergency within 24 hrs% regular within 30 days	
2. Narrative: issues and proposed actions	
3. Target rates at end of period	
D. Inspections	
1. Description of inspection strategy	
2. Planned inspections (% this FY)	
E. Security	
1. Narrative: security issues and proposed actions	

1. AHA Legacy Attachment B Requirements

Appendix A
3 of 8

Annual Plan Element	Location in FY 2017 MTW Plan
VIII. Management Information for Leased Housing	
A. Leasing Information	
1. Units under lease (%) beginning of period	Appendix D: Housing Opportunities
2. Target lease up rate at end of period	Public Housing inventory is reported to HUD through HUD's Inventory Management System (IMS)/ PIH Information Center (PIC) system. Housing Choice unit leasing information is submitted through the Voucher Management System (VMS).
3. Plans regarding: <ul style="list-style-type: none"> • Ensuring rent reasonableness • Expanding housing opportunities • Deconcentration of low-income families 	Section II. 2017 Priorities Section III. MTW Policy Innovations Appendix C: Ongoing Activities
4. Issues and proposed actions	
B. Inspection Strategy	
1. Description of inspection strategy, including: <ul style="list-style-type: none"> a) Planned inspections completed (% this FY) by category: <ul style="list-style-type: none"> • Annual HQS Inspections • Pre-contract HQS Inspections • HQS Quality Control Inspections b) HQS Enforcement 	AHA will continue to refine its Housing Choice Inspections Standards to ensure that Housing Choice participants have the opportunity to reside in quality living environments including quality housing units and quality neighborhoods. AHA established higher inspection standards than HUD's Housing Quality Standards with a focus on improving the quality of the units on the Housing Choice Voucher Program. Section III. MTW Policy Innovations
IX. Resident Programs	
A. Description of activities	Section II. 2017 Priorities
B. Issues and proposed actions	Appendix C: Ongoing Activities Appendix H: HUD Information Reporting Requirement

1. AHA Legacy Attachment B Requirements

Annual Plan Element	Location in FY 2017 MTW Plan
X. Other Information as Required	
A. Board Resolution <ul style="list-style-type: none"> • Adopting Plan • Certifying that Public Hearing Requirements were met 	Appendix B: FY 2017 MTW Plan Resolution & Certifications
B. Required Certifications and other submissions from which the Agency is not exempted by the MTW Agreement	Appendix B: FY 2017 MTW Plan Resolution & Certifications <ul style="list-style-type: none"> • Secretary's Certificate • Certification Regarding Substantive Information Reporting Requirements • Certifications of Compliance with Regulations • Certification of Consistency with the Consolidated Plan and Analysis of Impediments to Fair Housing Choice • Certification of Payments to Influence Federal Transactions • Certification for a Drug Free Workplace <p>NOTE: AHA has replaced HUD's "Disclosure of Lobbying Activities" Certification with HUD Form 50071: "Certification of Payments to Influence Federal Transactions" because AHA does not engage in lobbying activities. This action is consistent with AHA's current business practice.</p>
C. Submissions required for the receipt of funds	<p>HUD no longer requires an annual submission from AHA to request Housing Choice funds; AHA submitted the CY2016 Public Housing Operating Subsidy Calculations to HUD on February 19, 2016.</p> <p>AHA submitted its acceptance of 2016 Capital Fund Program (CFP) funds and Replacement Housing Factor (RHF) funds for AHA's FY 2017 MTW Annual Plan on February 16, 2016.</p>

2. HUD Form 50900 Attachment B

Source: HUD Form 50900, Elements for the Annual MTW Plan and Annual MTW Report

Reference: OMB Approval Number 2577-0216 (expires 5/31/2016)

Description: The following cross-reference chart is provided as a convenience for HUD review. Per AHA's Amended and Restated MTW Agreement, AHA's reporting requirements are based only on Legacy Attachment B (Attachment B to AHA's MTW Agreement).

Annual Plan Element	Location in FY 2017 MTW Plan
I. Introduction	
A. Table of Contents, which includes all the required elements of the Annual MTW Plan; and	Annual Plan Table of Contents Annual Plan Appendices Table of Contents
B. Overview of the PHA's short-term and long-term MTW goals and objectives. Short-term goals and objectives include those that the PHA plans to accomplish within the fiscal year. Long-term goals and objectives include those that the PHA plans to accomplish beyond the current fiscal year. PHAs have the ability to define the level of specificity in the short-term and long-term goals and objectives.	Section I. Executive Summary Section II. 2017 Priorities
II. General Housing Authority Operating Information	
A. Housing Stock Information:	
Planned new public housing units to be added during the fiscal year	Appendix D: Housing Opportunities Information Appendix H: HUD Information Reporting Requirement
Planned public housing units to be removed during the fiscal year	
New Housing Choice Vouchers to be project-based during the fiscal year	
Other changes to the housing stock anticipated during the fiscal year	
General description of all planned capital fund expenditures during the plan year	Appendix F: Financial Analysis
B. Leasing Information	
Planned number of households served at the end of the fiscal year	Appendix D: Housing Opportunities Information
Reporting Compliance with Statutory MTW Requirements	AHA does not have any non-MTW public housing units in its inventory.
Description of any anticipated issues related to leasing of public housing, Housing Choice vouchers and/or local, non-traditional units and possible solutions	Appendix D: Housing Opportunities Information

Annual Plan Element	Location in FY 2017 MTW Plan	
C. Wait List Information		
Wait list information projected for the beginning of the fiscal year by program	Appendix D: Housing Opportunities Information	
Description of changes to the wait list or policy changes.		
III. Proposed MTW Activities: HUD approval requested		
Provide the listed items below grouped by each MTW activity.		
A. Describe each proposed MTW activity;	Appendix H: HUD Information Reporting Requirement	
B. Describe how each proposed activity will achieve one or more of the three statutory objectives;		
C. Identify and discuss the anticipated impact of each proposed MTW activity on the stated objective(s);		
D. Provide the anticipated schedules for achieving the stated objective(s)		
E. Provide the metric(s) from the "Standard HUD Metrics" section, baseline performance level, yearly benchmarks, final projected outcome(s), and data source for metrics.		
F. Cite the authorization(s) detailed in Attachment C or D of the Standard MTW Agreement that gives the PHA the flexibility to conduct the activity. Explain why the cited authorization from Attachment C or D is needed to engage in this activity.		
G. Provide the following information for all rent reform activities: impact analysis, hardship case criteria, annual reevaluation of rent reform activity, transition period.	Appendix H: HUD Information Reporting Requirement	
IV. Approved MTW Activities: HUD approval previously granted		
Provide the listed items below grouped by each MTW activity.		
A. Implemented Activities		
1. List approved, implemented, ongoing activities continued from the prior plan year(s) that are actively utilizing flexibility from the MTW Agreement; specify the Plan Year in which the activity was first identified and implemented;	Section II. 2017 Priorities Appendix C: Ongoing Activities Appendix H: HUD Information Reporting Requirement	
2. Provide a description of the activity and an update on its status;		
3. Indicate if the PHA anticipates any non-significant changes or modifications, to the activity during the plan year;		
4. any changes or modifications to the metrics, baselines or benchmarks during the plan year;		

Annual Plan Element	Location in FY 2017 MTW Plan
5. If the PHA requires a different authorization from Attachment C or D when implementing the activity than was initially proposed, the PHA must re-propose the activity and include all required elements in Section (III) Proposed Activities.	On November 13, 2008, AHA and HUD executed AHA's Amended and Restated MTW Agreement. On January 16, 2009, AHA and HUD executed a further amendment to the Amended and Restated MTW Agreement (collectively, the "Amended and Restated MTW Agreement"), which clarified and expanded AHA's ability to use MTW Funds outside of Section 9 and Section 8 of the U.S. Housing Act of 1937, as amended ("1937 Act"). The Amended and Restated MTW Agreement re-affirmed, in all material respects, all of the authorizations set forth in Appendix A of the Original MTW Agreement and includes these authorizations in Attachment D. AHA has all of the authorizations needed from HUD under the Amended and Restated MTW Agreement to implement the activities described in AHA's FY 2017 MTW Annual Plan.
B. Not Yet Implemented Activities	
1. Describe any approved activities that have been implemented that the PHA has stopped implementing but has plans to reactivate in the future; specify the Plan Year in which the activity was first approved, implemented, and placed on hold;	Appendix H: HUD Information Reporting Requirement
2. Provide an update on the plan for implementation of the activity;	
3. Provide a timeline for implementation;	
4. Provide an explanation of any non-significant changes or modifications to the activity since it was approved.	
C. Activities On Hold	
1. Describe any approved activities that have been implemented that the PHA has stopped implementing but has plans to reactivate in the future; specify the Plan Year in which the activity was first approved, implemented, and placed on hold;	Appendix H: HUD Information Reporting Requirement
2. Discuss why these activities have been placed on hold;	
3. Provide an update on the plan for reactivating the activity;	
4. Provide a timeline for re-implementation; and	
5. Provide an explanation of any non-significant changes or modifications to the activity since it was approved.	

Annual Plan Element	Location in FY 2017 MTW Plan	
D. Closed Out Activities		
1. List any approved activities that have been closed out, including activities that have never been implemented, that the PHA does not plan to implement and obsolete activities; specify the Plan Year in which the activity was first approved and implemented (if applicable);	Appendix H: HUD Information Reporting Requirement	
2. Explain why these activities were closed out; and		
3. Provide the year the activity was closed out.		
V. Sources and Uses of Funds		
PHAs shall provide the estimated sources and amounts of MTW funding by FDS line item.		
Estimated sources of MTW funding for the fiscal year	Appendix F: Financial Analysis	
Estimated uses of MTW funding for the fiscal year	Appendix H: HUD Information Reporting Requirement	
Describe activities that will use only MTW Single Fund flexibility		
Local Asset Management Plan	Appendix C: Ongoing Activities	
VI. Administrative		
A. Resolution signed by the Board of Commissioners, or other authorized PHA official if there is no Board of Commissioners, adopting the Annual MTW Plan Certification of Compliance (provided at the end of this Attachment B);	Appendix B: FY 2017 MTW Plan Resolution & Certifications	
B. The beginning and end dates of when the Annual MTW Plan was made available for public review, the dates, locations of public hearings and total number of attendees for the draft Annual MTW Plan, (to ensure PHAs have met the requirements for public participation, HUD reserves the right to request additional information to verify PHAs have complied with all requirements as set forth in the Standard MTW Agreement);	Appendix B: FY 2017 MTW Plan Resolution & Certifications	
C. Description of any planned or ongoing PHA-directed evaluations of the demonstration for the overall MTW program or any specific MTW activities, if applicable; and	N/A	
D. The Annual Statement/Performance and Evaluation Report (HUD 50075.1) or subsequent form required by HUD for MTW and non-MTW Capital Fund grants for each grant that has unexpended amounts, including estimates for the Plan Year and all three parts of the report.	N/A	

SECRETARY'S CERTIFICATE

I, JOY W. FITZGERALD, DO HEREBY CERTIFY that:

1. I am the presently appointed and qualified Secretary of the Board of Commissioners of The Housing Authority of the City of Atlanta, Georgia ("AHA"). In such capacity, I am custodian of its records and I am familiar with its organization, membership and activities.
2. Attached hereto as Exhibit 1 is a true and correct copy of the resolution authorizing AHA to submit its Fiscal Year 2017 Moving To Work Annual Implementation Plan to the United States Department of Housing and Urban Development and to implement the projects, activities, initiatives and any policy changes described therein, and other related matters.
3. This resolution was presented to the AHA Board of Commissioners (the "Board") at its Regular Meeting on March 30, 2016 (the "Meeting").
4. The following Board members were present for the Meeting:

James Allen, Jr., Vice Chair
Justine Boyd
Dr. Christopher Edwards
Brandon Riddick- Seals
Robert Rumley, III

5. At the Meeting, the Board unanimously adopted and approved the resolution attached hereto as Exhibit 1.

IN WITNESS WHEREOF, I have hereunto set my hand and the duly adopted official seal of The Housing Authority of the City of Atlanta, Georgia this 30th day of March 2016.

SEAL




JOY W. FITZGERALD,
Secretary

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EXHIBIT 1
RESOLUTION ADOPTED AT THE REGULAR MEETING
OF THE BOARD OF COMMISSIONERS HELD ON
WEDNESDAY, MARCH 30, 2016

ITEM NO. EO-1:

To consider and act upon a resolution authorizing The Housing Authority of the City of Atlanta, Georgia to submit its Fiscal Year 2017 Moving to Work Annual Plan to the United States Department of Housing and Urban Development and to implement the projects, activities, initiatives and any policy changes described therein, and other related matters.

EXPLANATION

The Housing Authority of the City of Atlanta, Georgia (AHA) executed its Amended and Restated Moving to Work Agreement, effective as of November 13, 2008, as further amended by that certain Second Amendment to the Moving to Work Agreement, effective as of January 16, 2009 (MTW Agreement) with the United States Department of Housing and Urban Development (HUD). The MTW Agreement is effective through June 30, 2018, unless further extended. The MTW Agreement requires AHA to submit an MTW Annual Plan to HUD in lieu of the Five-Year Plan and Annual Plan traditionally required by Section 5A of the United States Housing Act of 1937, as amended. During each year of the MTW demonstration period, an MTW Annual Plan must be submitted to HUD with a resolution adopted by the AHA Board of Commissioners approving the plan and certifying that a public hearing has been held regarding the plan.

AHA has prepared its Fiscal Year (FY) 2017 MTW Annual Plan (also referred to herein as the FY 2017 MTW Annual Plan). The FY 2017 MTW Annual Plan identifies AHA's priorities, projects, activities and initiatives for AHA's FY 2017 and any policy changes to be implemented during FY 2017. The Amended and Restated Statement of Corporate Policies is the controlling policy document governing the assistance programs administered by AHA. The Amended and Restated Statement of Corporate Policies, which is incorporated into the FY 2017 MTW Annual Plan, is organized into four chapters and captures the Moving to Work Demonstration policy innovations in effect for the AHA-Sponsored Mixed-Income, Mixed-Finance Communities, AHA-Owned Residential Communities, Housing Choice Tenant-Based Program, Project Based Rental Assistance, and Supportive Housing (collectively "Rental Assistance Programs").

During FY 2017, AHA will continue to advance its real estate initiatives to create more housing opportunities, advance its human development and supportive services initiatives, and optimize its administrative efficiencies and cash management. AHA's Senior Management consulted with the Board of Commissioners to solicit their input, guidance and direction regarding the proposed projects, activities, initiatives and policy changes that will be implemented during FY 2017, as described in Exhibit EO-1-A.

AHA's FY 2017 MTW Annual Plan is the product of a comprehensive planning process in which AHA's Senior Management consulted with AHA's Board of Commissioners, resident association leaders, public housing-assisted residents, Housing Choice participants and landlords, AHA employees, Atlanta Legal Aid, Georgia Law Center for the Homeless, AHA's private sector development partners, members of the Service Provider Network, local political and government officials, various city and state agencies, other stakeholders and members of the public. Comments and suggestions were made at those various meetings, all of which were considered by Senior Management of AHA and incorporated as deemed appropriate. The consultation process included a properly advertised and noticed public hearing held on March 8, 2016.

Senior Management of AHA is now recommending that the Board of Commissioners: (i) approve AHA's FY 2017 MTW Annual Plan; (ii) authorize the submission of AHA's FY 2017 MTW Annual Plan to HUD; (iii) authorize the Chair or the Vice Chair of the Board of Commissioners and AHA's President and Chief Executive Officer/Secretary to execute the HUD Certifications of Compliance, attached as Exhibit EO-1-B; (iv) approve the implementation of the projects, activities, initiatives and any policy changes set forth in the FY 2017 MTW Annual Plan; and (v) approve the adoption and implementation of the Amended and Restated Statement of Corporate Policies as set forth in the FY 2017 MTW Annual Plan.

RESOLUTION

WHEREAS, The Housing Authority of the City of Atlanta, Georgia (AHA) executed its Amended and Restated Moving to Work Agreement, effective as of November 13, 2008, as further amended by that certain Second Amendment to the Moving to Work Agreement, effective as of January 16, 2009 (MTW Agreement) with the United States Department of Housing and Urban Development (HUD);

WHEREAS, the MTW Agreement is effective through June 30, 2018, unless further extended;

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

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

WHEREAS, AHA has prepared its Fiscal Year (FY) 2017 MTW Annual Plan (also referred to herein as the FY 2017 MTW Annual Plan);

WHEREAS, the FY 2017 MTW Annual Plan identifies AHA's priorities, projects, activities, and initiatives for AHA's FY 2017 and any policy changes to be implemented during FY 2017;

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

WHEREAS, the Amended and Restated Statement of Corporate Policies, which is incorporated into the FY 2017 MTW Annual Plan, is organized into four chapters and captures the Moving to Work Demonstration policy innovations in effect for the AHA-Sponsored Mixed-Income, Mixed-Finance Communities, AHA-Owned Residential Communities, Housing Choice Tenant-Based Program, Project Based Rental Assistance, and Supportive Housing (collectively “Rental Assistance Programs”);

WHEREAS, during FY 2017, AHA will continue to advance its real estate initiatives to create more housing opportunities, advance its human development and supportive services initiatives, and optimize its administrative efficiencies and cash management;

WHEREAS, AHA’s Senior Management consulted with the Board of Commissioners to solicit their input, guidance and direction regarding the proposed projects, activities, initiatives and policy changes that will be implemented during FY 2017, as described in Exhibit EO-1-A;

WHEREAS, AHA’s FY 2017 MTW Annual Plan is the product of a comprehensive planning process in which AHA’s Senior Management consulted with AHA’s Board of Commissioners, resident association leaders, public housing-assisted residents, Housing Choice participants and landlords, AHA employees, Atlanta Legal Aid, Georgia Law Center for the Homeless, AHA’s private sector development partners, members of the Service Provider Network, local political and government officials, various city and state agencies, other stakeholders and members of the public;

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

WHEREAS, the consultation process included a properly advertised and noticed public hearing held on March 8, 2016; and

WHEREAS, Senior Management of AHA is now recommending that the Board of Commissioners: (i) approve AHA’s FY 2017 MTW Annual Plan; (ii) authorize the submission of AHA’s FY 2017 MTW Annual Plan to HUD; (iii) authorize the Chair or the Vice Chair of the Board of Commissioners and AHA’s President and Chief Executive Officer/Secretary to execute the HUD Certifications of Compliance, attached as Exhibit EO-1-B; (iv) approve the implementation of the projects, activities, initiatives and any policy changes set forth in the FY 2017 MTW Annual Plan; and (v) approve the adoption and implementation of the Amended and Restated Statement of Corporate Policies as set forth in the FY 2017 MTW Annual Plan;

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

1. AHA’s FY 2017 MTW Annual Plan, including the projects, activities, initiatives and any policy changes that will be implemented during FY 2017 as described in Exhibit EO-1-A, is hereby approved.

2. Each of the Chair or the Vice Chair of the Board of Commissioners, as required, and the President and Chief Executive Officer/Secretary is hereby authorized to execute Exhibit EO-1-B and any other required documents, certifications or United States Department of Housing and Urban Development (HUD) forms related to the approval and filing of AHA's FY 2017 MTW Annual Plan.
3. The Amended and Restated Statement of Corporate Policies, as set forth in AHA's FY 2017 MTW Annual Plan, is hereby approved in conjunction with AHA's FY2017 Annual Plan, and AHA is hereby authorized to adopt and implement such policies.
4. The President and Chief Executive Officer is authorized to submit AHA's FY 2017 MTW Annual Plan and such other required documents, certifications or forms to HUD with such changes, additions, corrections or amendments as she shall deem necessary or appropriate or as may be required by HUD.
5. The President and Chief Executive Officer and any person or persons designated and authorized to so act by the President and Chief Executive Officer are hereby authorized to implement the projects, activities, initiatives and any policy changes set forth in the FY 2017 MTW Annual Plan.

**FY 2017 MTW Annual Plan Resolution
Exhibit EO-1-A**



**Atlanta Housing Authority
FY 2017 MTW Annual Plan**

Public Hearing
AHA Headquarters
March 8, 2016

SHEILA HARRIS

Chair
Jurisdiction-Wide Council

FY 2017 MTW Annual Plan Resolution
Exhibit EO-1-A

JOY W. FITZGERALD

President & Chief Executive Officer

► March, 2016

FY 2017 MTW Annual Plan

3

Vision

Healthy Mixed-Income Communities;
Healthy Self-Sufficient Families

Mission

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

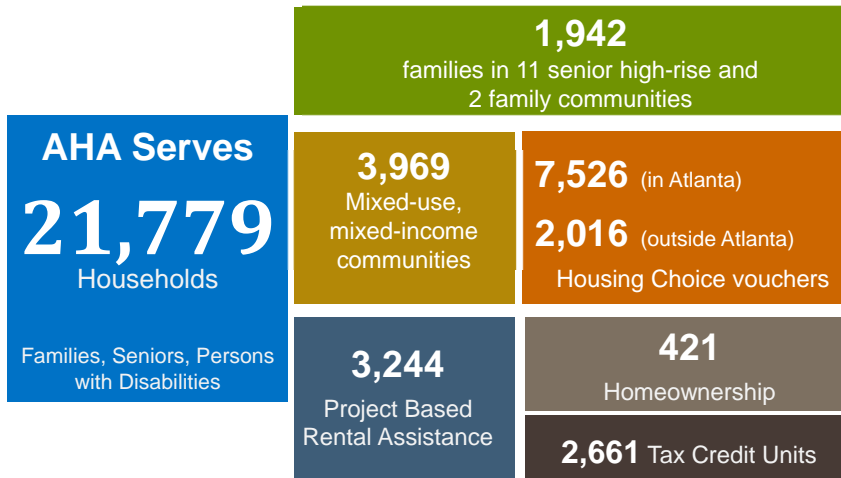
► March, 2016

FY 2017 MTW Annual Plan

4

FY 2017 MTW Annual Plan Resolution Exhibit EO-1-A

AHA Households Served in 2015



► March, 2016

FY 2017 MTW Annual Plan

5

FY 2017 Key Priorities

- 1** Housing Opportunities and Real Estate Development
- 2** Human Development and Supportive Services
- 3** Administration

This presentation includes highlights from the Annual Plan.
For complete details, download the draft Plan at
atlantahousing.org

► March, 2016

FY 2017 MTW Annual Plan

6

FY 2017 MTW Annual Plan Resolution
Exhibit EO-1-A

TRISH O'CONNELL

Vice President

Real Estate Development & Acquisitions

► March, 2016

FY 2017 MTW Annual Plan

7

1

Housing Opportunities and Real Estate Development

**Expand and preserve housing
opportunities while facilitating
development of new mixed-income
communities.**

► March, 2016

FY 2017 MTW Annual Plan

8

FY 2017 MTW Annual Plan Resolution

Exhibit EO-1-A

Advance master plans for mixed-use, mixed-income communities.

1. **Auburn Pointe**
(former Grady Homes)
2. **Capitol Gateway**
(former Capitol Homes)
3. **Centennial Place**
(former Techwood / Clark Howell Homes)
4. **West Highlands**
(former Perry Homes)
5. **Mechanicsville**
(former McDaniel Glenn)
6. **Scholars Landing**
(former University Homes)
7. **Villages at Carver**
(former Carver Homes)

For All Communities

- Support the redevelopment of the properties acquired by AHA or its affiliate(s) through the disposition of land for redevelopment that furthers the master plan and stabilizes the community.
- Explore potential disposition to the procured development partner or an affiliate thereof of land owned by AHA and land acquired by AHA.
- Update the Master Plan and may explore updates to revitalization plan.

► March, 2016

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Real
Estate

9

AHA-Sponsored Mixed-Income Communities

Auburn Pointe

- Support the redevelopment of acquired properties that furthers the Auburn Pointe master plan and stabilizes the community.
- Continue to remediate and explore the adaptive re-use of the historic structure at 20 Hilliard Street.



20 Hilliard Street

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10

FY 2017 MTW Annual Plan Resolution

Exhibit EO-1-A

AHA-Sponsored Mixed-Income Communities

Mechanicsville

- Continue development of 75 scattered-site affordable rent-to-own units.

Collegetown at West End

- Explore potential disposition to the procured development partner of land owned by AHA for development of additional housing.
- Potential disposition for urban garden and educational center.

► March, 2016

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11

AHA-Sponsored Mixed-Income Communities

West Highlands

- Continue public improvements for future development of for-sale homes.
- Donate 7.6 acres of land to Atlanta Public Schools (APS) for charter school.
- Potential disposition of land to Homeowner Association for non-housing purposes.



Westside Atlanta Charter School Students

► March, 2016

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12

FY 2017 MTW Annual Plan Resolution

Exhibit EO-1-A

AHA-Sponsored Mixed-Income Communities

Centennial Place

- Explore potential disposition to the procured development partner for housing development including:
 - Historic Cupola building
 - Centennial Place North parcel
- Maintain active involvement in the repositioning of Centennial Place School into a premier grades K-8 STEAM school
 - Potential sub-lease for temporary facilities
 - Potential disposition for permanent improvements.



Cupola Building

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13

University Choice Neighborhood

- Awarded \$30 million from HUD in October 2015.
- Comprehensive Neighborhood Transformation Plan
- Key Partners
 - **AHA** (Applicant and People Plan Lead)
 - **City of Atlanta** (Co-Applicant)
 - **MBS-Integral UCNI, LLC** (Housing Plan Lead)
 - **Invest Atlanta** (Neighborhood Plan Lead)
 - **United Way of Greater Atlanta** (Education Plan Lead)



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14

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Exhibit EO-1-A

University Choice Neighborhood

- Continue development of multi-family rental at Ashley I and II (373 total units including 169 PBRA units).
- Continue adaptive re-use of the historic Roosevelt Administration building.
- Explore activities for Phase 5 Homeownership (33 homes).



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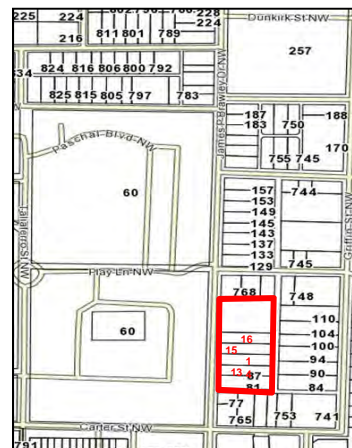
Real Estate

15

University Choice Neighborhood

Cop on the Block Program

- Construction of affordable single family homes for City of Atlanta police officers.
- Disposition of AHA-owned land in Vine City.
- Partnership with the Arthur M. Blank Family Foundation, Atlanta Police Foundation, Pulte Homes, and Invest Atlanta.



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Real Estate

16

FY 2017 MTW Annual Plan Resolution

Exhibit EO-1-A

University Choice Neighborhood

Choice Neighborhoods Area



Ashview Heights



Acquisition of land for future rental housing, greenspace and neighborhood stabilization.

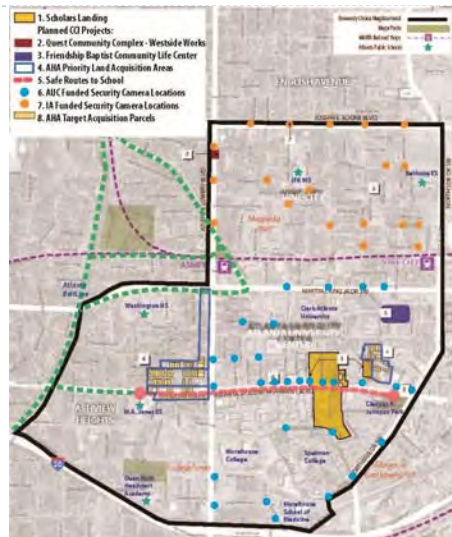
March, 2016

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Real Estate

17

University Choice Neighborhood



Critical Community Improvements

- Development of a community facility.
- To support neighborhood stabilization, partnership with Atlanta Police Department to fund:
 - Code enforcement
 - Demolition of vacant structures

March, 2016

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18

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Choice Neighborhoods

- May explore applying for a Choice Neighborhoods *Implementation* Grant to support the revitalization **Englewood Manor**.
- May explore applying for Choice Neighborhoods *Planning* Grants to support the revitalization of the **Hollywood Courts** and **Bowen Homes** sites.

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19

Advance longer-term real estate development strategy.

- Engage in land transactions (acquisitions, sale, swaps, dispositions) to support development of affordable housing.
 - Potential ground lease or sales of three properties in the Grant Park area.
- For sites not planned for redevelopment, implement short- and long-term options including community gardens, urban farming.
- Support community and economic development and neighborhood revitalization initiatives that may benefit low-income families.

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20

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Revitalization of Quality of Life Initiative Sites

Herndon Homes

- Working with private sector development partner and stakeholders, finalize the Master Plan.
- Explore land swaps and/or dispositions of land with neighboring property owners.



Herndon Homes Site

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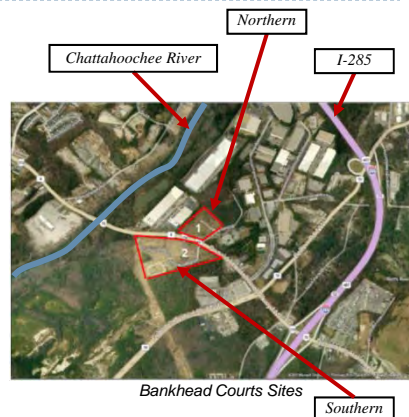
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21

Revitalization of Quality of Life Initiative Sites

Bankhead Courts

- Implement land swap with City of Atlanta for the northern 10-acre parcel.
- Explore options, including disposition, for the remaining 35 acres.



Bankhead Courts Sites

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22

FY 2017 MTW Annual Plan Resolution

Exhibit EO-1-A

Revitalization of Quality of Life Initiative Sites

Englewood Manor

- Issue Request for Qualifications for private sector developer.
- Engage stakeholders including adjacent land owners to develop the Master Plan.
- Explore funding options for public improvements, tax credits and bonds for first phase of development.

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23

Revitalization of Quality of Life Initiative Sites

U-Rescue Villa/311 North Avenue

- Issue Request for Qualifications for private sector developer to develop western portion of U-Rescue Villa and AHA-acquired land at 311 North Avenue.



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24

FY 2017 MTW Annual Plan Resolution Exhibit EO-1-A

MIKE WILSON

Interim Vice President
Real Estate Investments & Finance

► March, 2016

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25

Increase housing opportunities

Project Based Rental Assistance (PBRA) Program

Properties Coming online in FY 2017

Community	New PBRA units (projected)
Reynoldstown	26
Veranda at Groveway	31
The Remington	160

- Request for Proposal (RFP) active for new and existing housing. Rents capped at 60% of Area Median Income (AMI).
- Issue Request for Proposals for new and existing housing in **Areas of Opportunity** within Atlanta + 10-mile radius. Rents will not be limited to 60% AMI.

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26

FY 2017 MTW Annual Plan Resolution

Exhibit EO-1-A

Areas of Opportunity

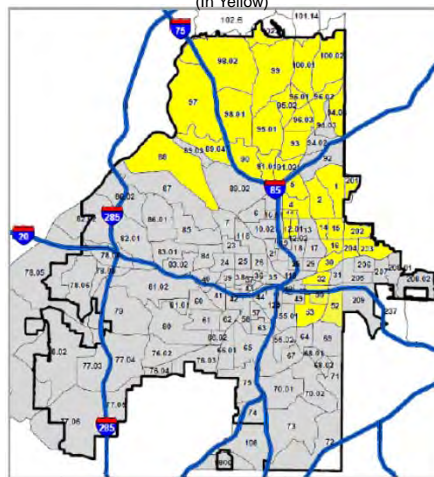
Definition:

Census tracts which
have poverty rates
less than or equal to
20%

AND

minority
concentration less
than or equal to
50%.

Areas of Opportunity by Census Tract
(In Yellow)



Sources: 2010 U.S. Census Bureau, 2014 American Community Survey

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27

Reformulation

- Continue conversion of 301 units at Centennial Place under MTW-Approved Reformulation Demonstration.
 - Allows for conversion of public housing operating subsidy to AHA's Project Based Rental Assistance.
 - Continue progress on Centennial Phases I and II.
- In FY 2017, complete closing and begin construction on Centennial Phase III.



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28

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Exhibit EO-1-A

TOM HOENSTINE

Vice President
Real Estate Oversight & Services

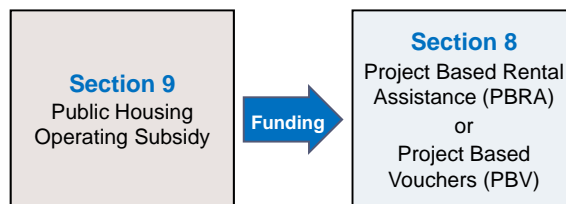
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29

HUD Rental Assistance Demonstration Program (RAD)

- Created to help address the \$26 billion nationwide backlog of deferred maintenance
- Enables public housing authorities to preserve and improve public housing properties by leveraging public and private debt/equity



- Limits funding to the equivalent of public housing operating funds + capital funds

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30

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RAD Applications Submitted

Juniper & Tenth Highrise

- Received HUD Commitment to enter into a Housing Assistance Payments Contract (CHAP)
- Awarded an allocation of 9% Low Income Housing Tax Credits (LIHTC)



Juniper & Tenth Highrise GA006000430	
Total Units	149
Type	Near Elderly, Elderly and Non-Elderly Disabled
Bedroom Type:	
Studio	86
One Bedroom	63

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Estate

RAD Applications Submitted

Piedmont Road Highrise

- Currently on HUD RAD waiting list for CHAP.
- AHA's partner is preparing an application for 4% LIHTC.



Piedmont Road Highrise GA006000480	
Total Units	208
Type	Near Elderly, Elderly and Non-Elderly Disabled
Bedroom Type:	
One Bedroom	207
Two Bedroom	1

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Exhibit EO-1-A

Use of Reformulation vs. RAD

- If HUD does not have enough RAD capacity, then AHA will request HUD approval of conversions under AHA's MTW-approved Reformulation approach (utilizes voluntary conversion and disposition).
- Properties considered during FY 2017:
 - Piedmont Road
 - Castleberry I and II
 - Hightower Manor
 - Villages of East Lake I & II
 - Cosby Spear
 - Villages at Carver
 - Peachtree Road

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33

Elimination of Flat Rents

Proposed MTW Activity

- Flat rent option is available for public housing
- Drivers
 - In 2014, HUD mandated that flat rents are no less than 80% of Fair Market Rents (FMR).
 - Few flat renters left (26 public housing households)
 - Administrative burden – HUD adjusts FMRs annually.
- Proposed
 - Income-adjusted rent based on 30% of income
 - Phased transition plan for affected families
- Benefits
 - Anticipates conversion from Section 9 to Section 8
 - Aligns policies across programs

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34

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RENEÉ BENTLEY

Senior Vice President
Customer Services Group

► March, 2016

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35

Increase housing opportunities

Housing Choice Tenant-Based Voucher Program

- Exhaust 2015 Housing Choice waiting list.
- House 800 new families.
- Open Housing Choice waiting list.



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Estate

36

FY 2017 MTW Annual Plan Resolution Exhibit EO-1-A

Housing Choice Lease-Up Activities

- Marketing and Outreach Plan
- Updated Sub-Market Areas and Payment Standards
- Incentive Fees
 - Inspection First-Time Pass Bonus for Single Family Units
 - Leasing Incentive Fees
 - New Contract Incentive for Single Family Homes
- Streamlined AHA Enhanced Inspections Standards
- High-Performing Multifamily Properties
 - Expedited Lease-up
 - Self-Certification Inspections

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FY 2017 MTW Annual Plan

Admin

37

2

Human Development and Supportive Services

Increase the number of Housing Choice households that are compliant with AHA's Work/Program Requirement and expand homelessness programs.

- A. Increase work/program participation of Housing Choice families.
- B. Expand supportive housing and homelessness initiatives.

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FY 2017 MTW Annual Plan

Services

38

FY 2017 MTW Annual Plan Resolution Exhibit EO-1-A

Work/Program Requirement

- Applies to all programs.
- Housing Choice families have lowest compliance.
- Strategy began in FY 2014.
- Additional 700 families compliant/progressing since 2014.

Compliant

At least one non-elderly, non-disabled adult household member must work full-time
(at least **30 hours per week**)

AND

all other non-elderly, non-disabled adult members work and/or attend training or school for a combined total of 30 hours).

Progressing

In Housing Choice, households in which all Target Adults are engaged in **15 or more hours** of work, school, and/or training.

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FY 2017 MTW Annual Plan

Services

39

Case Management and Service Providers



126

Organizations in
Service Provider
Network

- GED Preparation and Adult Literacy
- Job Training and Certifications
- Job Placement for Long-Term Unemployed
- Expungement and Job Placement
- Vocational Counseling Services
- Therapeutic Services
- After-School Programming
- Adult Day Care Services

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FY 2017 MTW Annual Plan

Services

40

FY 2017 MTW Annual Plan Resolution

Exhibit EO-1-A

TRACEY SCOTT

Vice President
Office of Policy & Strategy

► March, 2016

FY 2017 MTW Annual Plan

41

Homelessness Initiatives

- Veterans Affairs Supportive Housing
- Family Unification Program
- “FLOW” Program
- Short Term Housing Assistance
- Georgia Housing Voucher Program Conversion

Partners

Veterans Affairs

Family & Children
Services

Atlanta Continuum
of Care

United Way

State of Georgia

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Services

42

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Next Step Youth Self-Sufficiency Program

Proposed MTW Activity

- Purpose: assist former foster care youth (“transitioning youth”) in becoming self-sufficient
 - Homeless
 - Working and/or attending school
- Georgia Department of Family and Children Services
 - Provides qualified referrals.
 - Support services through Independent Living Program.
- Voucher good for 3 years or up to age 23.

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FY 2017 MTW Annual Plan

Services

43

3

Administration

Optimize Housing Choice processes to improve cycle-times and manage finances within HUD cash management guidelines.

- A. Reengineer Housing Choice to facilitate lease-up success.
- B. Continue Cash Management strategy to optimize receipt and use of Federal funds.

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FY 2017 MTW Annual Plan

Admin

44

FY 2017 MTW Annual Plan Resolution Exhibit EO-1-A

Updates to the *Statement of Corporate Policies*

- Alignment with HUD rules
 - Criminal screening
 - Over-income households
- Other Updates
 - Deconcentration targets
 - Definition of Elderly or Disabled family
 - Income disregard policy
 - Occupancy guidance
 - PBRA and RAD

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45

Questions & Comments



▶ March, 2016

FY 2017 MTW Annual Plan

46

**FY 2017 MTW Annual Plan Resolution
Exhibit EO-1-A**

Public Comment Period

February 18 – March 19, 2016

Provide comments via the following:

www.atlantahousing.org

strategy@atlantahousing.org

MTW Plan Message Line: 404-817-7458

March, 2016

FY 2017 MTW Annual Plan

47



THANK YOU

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, 2016**, 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.

13. The PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.
14. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
15. The PHA will provide HUD or the responsible entity any documentation needed to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58. Regardless of who acts as the responsible entity, the PHA will maintain documentation that verifies compliance with environmental requirements pursuant to 24 Part 58 and 24 CFR Part 50 and will make this documentation available to HUD upon its request.
16. With respect to public housing the PHA will comply with Davis-Bacon or HUD determined wage rate requirements under section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
17. The PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.
18. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.
19. The PHA will comply with the policies, guidelines, and requirements of OMB Circular No. A-87 (Cost Principles for State, Local and Indian Tribal Governments) and 24 CFR Part 85 (Administrative Requirements for Grants and Cooperative Agreements to State, Local and Federally Recognized Indian Tribal Governments).
20. The PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the Moving to Work Agreement and Statement of Authorizations and included in its Plan.
21. All attachments to the Plan have been and will continue to be available at all times and all locations that the Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the PHA in its Plan and will continue to be made available at least at the primary business office of the PHA.

The Housing Authority of the
City of Atlanta, Georgia

PHA Name

GA 006

PHA Number/HA Code

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

Daniel Halpern
Name of Authorized Official

Chair, Board of Commissioners
Title

Signature

Date

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

**CERTIFICATION TO THE U.S. DEPARTMENT OF HOUSING AND URBAN
DEVELOPMENT REGARDING THE HOUSING AUTHORITY OF
THE CITY OF ATLANTA, GEORGIA'S
FY 2017 MOVING TO WORK ANNUAL PLAN**

On behalf of The Housing Authority of the City of Atlanta, Georgia ("AHA"), and in accordance with AHA's Amended and Restated Moving to Work ("MTW") Agreement, effective as of November 13, 2008, as further amended by that certain Second Amendment to the Moving to Work Agreement, effective as of January 16, 2009 (the "MTW Agreement"), I hereby certify that AHA's FY 2017 MTW Annual Plan meets the substantive information reporting requirements of the Paperwork Reduction Act for the MTW Demonstration Program and HUD Form 50900 (OMB Control Number 2577-0216).

**THE HOUSING AUTHORITY OF THE
CITY OF ATLANTA, GEORGIA**

By: 
Name: Joy W. Fitzgerald
Title: President and CEO

Date: March 30th, 2016

**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, 2016, 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.
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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.
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The Housing Authority of the
City of Atlanta, Georgia
PHA Name

GA 006
PHA Number/HA Code

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

Daniel Halpern
Name of Authorized Official

Chair, Board of Commissioners
Title


Signature

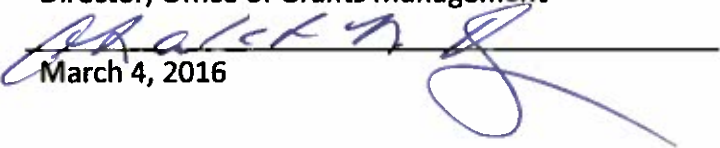
4/5/16
Date

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

Certifications of Consistency with the Consolidated Plan and Analysis of Impediments to Fair Housing Choice

I certify that the Atlanta Housing Authority Moving to Work Annual Plan for the Fiscal Year 2017 is consistent with the City of Atlanta's current Consolidated Plan (2015 – 2019). In particular, AHA's MTW FY2017 Annual Plan supports the City of Atlanta's Rehabilitation and Infill Housing, Cost-Burdened and Affordable Housing Needs, Special Needs Housing, Elderly Housing as well as other areas of the Consolidated Plan. I further certify that an Analysis of Impediments to Fair Housing Choice has been completed.

Applicant Name:	<u>The Housing Authority of the City of Atlanta, Georgia</u>
Project Name:	<u>Moving to Work Annual Plan for Fiscal Year 2017</u>
Location of the Project:	<u>City of Atlanta, Georgia</u>
Federal Program:	<u>Moving to Work Demonstration</u>

Certifying Jurisdiction:	City of Atlanta
Certifying Official:	Charlotte Daniely
Title:	Director, Office of Grants Management
Signature:	
Date:	March 4, 2016

Certification of Payments to Influence Federal Transactions

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

OMB Approval No. 2577-0157 (Exp. 01/31/2017)

Applicant Name

The Housing Authority of the City of Atlanta, Georgia (AHA)

Program/Activity Receiving Federal Grant Funding

Moving to Work Demonstration Program

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

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

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

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

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

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

Name of Authorized Official

Joy W. Fitzgerald

Title

President and CEO

Signature



Date (mm/dd/yyyy)

03/30/2016

Certification for a Drug-Free Workplace

U.S. Department of Housing
and Urban Development

Applicant Name

The Housing Authority of the City of Atlanta, Georgia (AHA)

Program/Activity Receiving Federal Grant Funding

Moving to Work Demonstration Program

Acting on behalf of the above named Applicant as its Authorized Official, I make the following certifications and agreements to the Department of Housing and Urban Development (HUD) regarding the sites listed below:

I certify that the above named Applicant will or will continue to provide a drug-free workplace by:

a. Publishing a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the Applicant's workplace and specifying the actions that will be taken against employees for violation of such prohibition.

b. Establishing an on-going drug-free awareness program to inform employees ---

(1) The dangers of drug abuse in the workplace;

(2) The Applicant's policy of maintaining a drug-free workplace;

(3) Any available drug counseling, rehabilitation, and employee assistance programs; and

(4) The penalties that may be imposed upon employees for drug abuse violations occurring in the workplace.

c. Making it a requirement that each employee to be engaged in the performance of the grant be given a copy of the statement required by paragraph a.;

d. Notifying the employee in the statement required by paragraph a. that, as a condition of employment under the grant, the employee will ---

(1) Abide by the terms of the statement; and

(2) Notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction;

e. Notifying the agency in writing, within ten calendar days after receiving notice under subparagraph d.(2) from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to every grant officer or other designee on whose grant activity the convicted employee was working, unless the Federal agency has designated a central point for the receipt of such notices. Notice shall include the identification number(s) of each affected grant;

f. Taking one of the following actions, within 30 calendar days of receiving notice under subparagraph d.(2), with respect to any employee who is so convicted ---

(1) Taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or

(2) Requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a Federal, State, or local health, law enforcement, or other appropriate agency;

g. Making a good faith effort to continue to maintain a drug-free workplace through implementation of paragraphs a. thru f.

2. Sites for Work Performance. The Applicant shall list (on separate pages) the site(s) for the performance of work done in connection with the HUD funding of the program/activity shown above: Place of Performance shall include the street address, city, county, State, and zip code. Identify each sheet with the Applicant name and address and the program/activity receiving grant funding.)

See attached listing.

Check here ☐ if there are workplaces on file that are not identified on the attached sheets.

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate.

Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties.
(18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

Name of Authorized Official

Joy W. Fitzgerald

Title

President and CEO

Signature

Date

X

03/30/2016

Attachment, Certification for a Drug-Free Workplace (HUD-50070)
AHA-Owned Facilities and Land (as of March 17, 2016)

Parcel ID	Address	City	State	Zip Code
14-0117-0003-055-2	0 Abbott St	Atlanta	GA	30310
14-0117-0003-017-2	320 Abbott St	Atlanta	GA	30310
15-180-02-025	0 Alston Dr SE	Atlanta	GA	30317
14-0072-0006-094-1	257 Amal Dr	Atlanta	GA	30315
17-0225-LL-103-6	1525 Argule Lane NW	Atlanta	GA	30318
14-0072-0002-032-5	0 Arthur J. Langford Rd	Atlanta	GA	30315
14-0116-0003-078-5	0 Ashby St	Atlanta	GA	30314
14-0046-0010-140-9	0 Auburn Ave NE	Atlanta	GA	30303
14-0046-0010-141-7	333 Auburn Ave NE	Atlanta	GA	30303
14-0046-0010-197-9	333 Auburn Ave NE	Atlanta	GA	30303
14-0117-0002-037-1	0 Baldwin St SW	Atlanta	GA	30310
14-0117-0002-038-9	0 Baldwin St SW	Atlanta	GA	30310
14-0117-0002-039-7	0 Baldwin St SW	Atlanta	GA	30310
14-0117-0002-040-5	1047 Baldwin St SW	Atlanta	GA	30310
14-0117-0002-095-9	1059 Baldwin St SW	Atlanta	GA	30310
17-0267-LL-075-5	3475 Bankhead Hwy NW	Atlanta	GA	30331
17-0267-LL-083-9	3476 Bankhead Hwy NW	Atlanta	GA	30331
14-0252-LL-064-3	2440 Barge Rd SW	Atlanta	GA	30331
14-0047-0001-093-0	0 Bedford Pl NE	Atlanta	GA	30303
14-0110-0004-034-3	875 Booker Washington Dr	Atlanta	GA	30314
14-0110-0007-007-6	880 Booker Washington Dr	Atlanta	GA	30314
14-0110-0004-036-8	883 Booker Washington Dr	Atlanta	GA	30314
14-0110-0007-006-8	886 Booker Washington Dr	Atlanta	GA	30314
14-0110-0007-004-3	890 Booker Washington Dr	Atlanta	GA	30314
14-0042-0004-080-9	951 Boulevard SE	Atlanta	GA	30312
14-0051-0009-159-4	0 Butler St	Atlanta	GA	30303
14-0051-0009-160-2	0 Butler St	Atlanta	GA	30303
14-0110-0009-017-3	757 Carter St	Atlanta	GA	30314
14-0110-0009-019-9	765 Carter St	Atlanta	GA	30314
14-0110-0009-018-1	767 Carter St	Atlanta	GA	30314
14-0079-0006-003-5	0 Centennial Olympic Park Dr NW	Atlanta	GA	30313
14-0079-0011-059-0	0 Centennial Olympic Park Dr NW	Atlanta	GA	30313
17-0005-LL-085-1	0 Cheshire Bridge Rd	Atlanta	GA	30324
17-0005-LL-086-9	2170 Cheshire Bridge Rd	Atlanta	GA	30324
17-0227-LL-018-4	0 Clarissa Dr NW	Atlanta	GA	30318
14-0041-0002-035-6	0 Climax St SE	Atlanta	GA	30315
14-0041-0002-052-1	373 Climax St SE	Atlanta	GA	30315
14-0041-0002-029-9	374 Climax St SE	Atlanta	GA	30315
14-0041-0002-051-3	379 Climax St SE	Atlanta	GA	30315
14-0041-0002-030-7	380 Climax St SE	Atlanta	GA	30315
14-0041-0002-050-5	385 Climax St SE	Atlanta	GA	30315
14-0041-0002-031-5	388 Climax St SE	Atlanta	GA	30315
14-0041-0002-049-7	393 Climax St SE	Atlanta	GA	30315
14-0041-0002-032-3	394 Climax St SE	Atlanta	GA	30315
14-0041-0002-033-1	400 Climax St SE	Atlanta	GA	30315
14-0041-0002-034-9	406 Climax St SE	Atlanta	GA	30315
14-0041-0002-048-9	407 Climax St SE	Atlanta	GA	30315
14-0041-0002-047-1	411 Climax St SE	Atlanta	GA	30315
14-0041-0002-036-4	412 Climax St SE	Atlanta	GA	30315
14-0041-0002-046-3	417 Climax St SE	Atlanta	GA	30315

Attachment, Certification for a Drug-Free Workplace (HUD-50070)
AHA-Owned Facilities and Land (as of March 17, 2016)

Parcel ID	Address	City	State	Zip Code
14-0041-0002-037-2	418 Climax St SE	Atlanta	GA	30315
14-0041-0002-038-0	424 Climax St SE	Atlanta	GA	30315
14-0041-0002-045-5	425 Climax St SE	Atlanta	GA	30315
14-0041-0002-039-8	430 Climax St SE	Atlanta	GA	30315
14-0041-0002-044-8	431 Climax St SE	Atlanta	GA	30315
14-0041-0002-040-6	436 Climax St SE	Atlanta	GA	30315
14-0041-0002-043-0	437 Climax St SE	Atlanta	GA	30315
14-0041-0002-041-4	442 Climax St SE	Atlanta	GA	30315
14-0041-0002-042-2	443 Climax St SE	Atlanta	GA	30315
17-0225-LL-052-5	1532 Craftsman Rd NW	Atlanta	GA	30318
14-0085-0013-115-0	330 Crumley St SW	Atlanta	GA	30312
14-0085-0013-088-9	376 Crumley St SW	Atlanta	GA	30312
14-0085-0013-085-5	390 Crumley St SW	Atlanta	GA	30312
14-0085-0013-084-8	394 Crumley St SW	Atlanta	GA	30312
14-0117-0003-061-0	940 Cunningham Pl	Atlanta	GA	30310
14-0081-0001-110-9	0 Curran St NW	Atlanta	GA	30318
14-0081-0004-107-2	0 Curran St NW	Atlanta	GA	30318
14-0041-0002-057-0	0 Dalton St SE	Atlanta	GA	30315
14-0041-0002-053-9	374 Dalton St SE	Atlanta	GA	30315
14-0041-0002-060-4	375 Dalton St SE	Atlanta	GA	30315
14-0041-0002-054-7	380 Dalton St SE	Atlanta	GA	30315
14-0041-0002-059-6	381 Dalton St SE	Atlanta	GA	30315
14-0041-0002-055-4	386 Dalton St SE	Atlanta	GA	30315
14-0041-0002-058-8	387 Dalton St SE	Atlanta	GA	30315
14-0041-0002-056-2	394 Dalton St SE	Atlanta	GA	30315
14-0045-0006-037-4	380 Decatur St SE	Atlanta	GA	30312
14-0075-0008-075-5	0 Doane St	Atlanta	GA	30312
17-0227-LL-003-6	590 Dobbs Circle	Atlanta	GA	30318
17-0224-0003-216-3	0 Drew Drive	Atlanta	GA	30318
17-0227-LL-075-4	0 Drew Place	Atlanta	GA	30318
15-180-03-023	380 East Lake Blvd SE	Atlanta	GA	30317
15-180-02-016	421 East Lake Blvd SE	Atlanta	GA	30317
15-180-03-025	457 East Lake Blvd SE	Atlanta	GA	30317
15-180-03-020	460 East Lake Blvd SE	Atlanta	GA	30317
14-0109-0005-076-6	178 Elm St SW	Atlanta	GA	30314
14-0109-0005-075-8	180 Elm St SW	Atlanta	GA	30314
14-0041-LL-011-0	0 Englewood Ave SE	Atlanta	GA	30315
14-0041-LL-013-6	0 Englewood Ave SE	Atlanta	GA	30315
14-0041-LL-010-2	505 Englewood Ave SE	Atlanta	GA	30315
14-0041-LL-012-8	505 Englewood Ave SE	Atlanta	GA	30315
14-0109-0005-083-2	0 Fair St SW	Atlanta	GA	30314
14-0084-0005-041-9	605-607 Fair St SW	Atlanta	GA	30314
14-0084-0005-043-5	615 Fair St SW	Atlanta	GA	30314
14-0109-0005-062-6	653 Fair St SW	Atlanta	GA	30314
14-0109-0005-073-3	655 Fair St SW	Atlanta	GA	30314
14-0109-LL-013-5	668 Fair St SW	Atlanta	GA	30314
14-0109-LL-033-3	668 Fair St SW	Atlanta	GA	30314
14-0055-0004-166-0	0 Fern Ave	Atlanta	GA	30315
14-0081-0004-104-9	0 Fifth St	Atlanta	GA	30305
14-0081-0004-105-6	0 Fifth St	Atlanta	GA	30305

Attachment, Certification for a Drug-Free Workplace (HUD-50070)
AHA-Owned Facilities and Land (as of March 17, 2016)

Parcel ID	Address	City	State	Zip Code
14-0075-0001-078-6	0 Formwalt St SW	Atlanta	GA	30312
14-0075-0001-156-0	629 Formwalt St SW	Atlanta	GA	30312
14-0116-0010-082-8	0 Frank St	Atlanta	GA	30314
14-0116-0010-083-6	0 Frank St	Atlanta	GA	30314
14-0116-0010-084-4	928 Frank St	Atlanta	GA	30314
14-0116-0010-058-8	931 Frank St	Atlanta	GA	30314
14-0116-0010-059-6	937 Frank St	Atlanta	GA	30314
14-0116-0010-081-0	940 Frank St	Atlanta	GA	30314
14-0116-0010-060-4	941 Frank St	Atlanta	GA	30314
14-0116-0010-080-2	944 Frank St	Atlanta	GA	30314
14-0116-0010-061-2	945 Frank St	Atlanta	GA	30314
14-0116-0010-079-4	948 Frank St	Atlanta	GA	30314
14-0116-0010-078-6	952 Frank St	Atlanta	GA	30314
14-0116-0010-077-8	954 Frank St	Atlanta	GA	30314
14-0116-0010-076-0	960 Frank St	Atlanta	GA	30314
14-0116-0010-075-2	964 Frank St	Atlanta	GA	30314
14-0116-0010-074-5	968 Frank St	Atlanta	GA	30314
14-0116-0010-109-9	980 Frank St	Atlanta	GA	30314
14-0085-LL-019-0	0 Fulton St	Atlanta	GA	30312
14-0085-LL-020-8	0 Fulton St	Atlanta	GA	30312
14-0085-LL-021-6	0 Fulton St	Atlanta	GA	30312
14-0045-0002-090-7	0 Gartrell St SE	Atlanta	GA	30312
14-0054-0003-075-5	0 Georgia Ave	Atlanta	GA	30312
14-0054-0002-082-2	142 Georgia Ave	Atlanta	GA	30312
14-0054-0002-083-0	174 Georgia Ave	Atlanta	GA	30312
14-0085-0013-101-0	0 Glenn St SW	Atlanta	GA	30312
14-0075-0001-159-4	254 Glenn St SW	Atlanta	GA	30312
14-0085-0013-102-8	1186 Glenn St SW	Atlanta	GA	30312
15-180-03-019	0 Glenwood Ave	Atlanta	GA	30317
14-0026-0001-073-7	0 Grange Dr	Atlanta	GA	30315
14-0026-0001-067-9	863 Grange Court	Atlanta	GA	30315
14-0054-0009-089-0	865 Grant Terrace	Atlanta	GA	30315
14-0082-0006-002-2	467 Gray St NW	Atlanta	GA	30318
14-0108-LL-025-0	565 Greensferry Road	Atlanta	GA	30314
14-0108-LL-023-5	600 Greensferry Road	Atlanta	GA	30314
14-0085-0009-083-6	19 Gregg St SW	Atlanta	GA	30312
17-0225-LL-015-2	0 Grove Park Pl NW	Atlanta	GA	30318
17-0225-LL-034-6	0 Grove Park Pl NW	Atlanta	GA	30318
17-0226-LL-019-3	0 Habershal Dr NW	Atlanta	GA	30318
17-0224-0003-214-8	1575 Habershal Dr NW	Atlanta	GA	30318
14-0007-0013-019-9	1150 Henry Thomas Dr	Atlanta	GA	30315
14-0055-0006-065-2	0 Hill St SE	Atlanta	GA	30312
14-0045-LL-480-3	0 Hilliard St SE	Atlanta	GA	30312
14-0045-LL-481-1	0 Hilliard St SE	Atlanta	GA	30312
14-0045-LL-482-9	0 Hilliard St SE	Atlanta	GA	30312
14-0046-0010-204-3	15 Hilliard St SE	Atlanta	GA	30312
14-0045-0001-058-5	20 Hilliard St SE	Atlanta	GA	30312
14-0045-0001-059-3	20 Hilliard St SE	Atlanta	GA	30312
14-0045-LL-474-6	109 Hilliard St SE	Atlanta	GA	30312
14-0045-0001-057-7	110 Hilliard St SE	Atlanta	GA	30312

Attachment, Certification for a Drug-Free Workplace (HUD-50070)
AHA-Owned Facilities and Land (as of March 17, 2016)

Parcel ID	Address	City	State	Zip Code
14-0045-LL-475-3	115 Hilliard St SE	Atlanta	GA	30312
14-0045-0006-036-6	126 Hilliard St SE	Atlanta	GA	30312
17-0251-LL-007-6	1580 Hollywood Rd NW	Atlanta	GA	30318
14-0085-LL-007-5	0 Humphries St	Atlanta	GA	30312
14-0085-LL-013-3	568 Humphries St	Atlanta	GA	30312
14-0079-0006-018-3	0 Hunnicutt St NW	Atlanta	GA	30313
14-0079-0006-019-1	0 Hunnicutt St NW	Atlanta	GA	30313
14-0079-0006-020-9	0 Hunnicutt St NW	Atlanta	GA	30313
14-0079-0006-021-7	0 Hunnicutt St NW	Atlanta	GA	30313
14-0079-0006-022-5	0 Hunnicutt St NW	Atlanta	GA	30313
14-0079-0006-023-3	0 Hunnicutt St NW	Atlanta	GA	30313
14-0085-0013-095-4	0 Ira St SW	Atlanta	GA	30312
14-0085-0013-096-2	0 Ira St SW	Atlanta	GA	30312
14-0085-0013-100-2	0 Ira St SW	Atlanta	GA	30312
14-0085-0013-092-1	579 Ira St SW	Atlanta	GA	30312
14-0085-0013-094-7	587 Ira St SW	Atlanta	GA	30312
14-0085-0013-097-0	595 Ira St SW	Atlanta	GA	30312
14-0085-0013-098-8	599 Ira St SW	Atlanta	GA	30312
14-0085-0013-099-6	603 Ira St SW	Atlanta	GA	30312
17-0259-LL-163-9	0 James Jackson Pkwy NW	Atlanta	GA	30318
14-0110-0009-021-5	81 James P. Brawley Dr NW	Atlanta	GA	30314
14-0110-0009-022-3	87 James P. Brawley Dr NW	Atlanta	GA	30314
14-0110-0009-023-1	91 James P. Brawley Dr NW	Atlanta	GA	30314
14-0110-0009-025-6	99 James P. Brawley Dr NW	Atlanta	GA	30314
14-0110-0009-024-9	93 - 95 James P. Brawley Dr NW	Atlanta	GA	30314
14-0110-0009-158-5	103-111 James P. Brawley Dr NW	Atlanta	GA	30314
14-0082-0006-008-9	0 John St	Atlanta	GA	30314
14-0082-0006-009-7	0 John St	Atlanta	GA	30314
14-0082-0006-011-3	0 John St	Atlanta	GA	30314
14-0051-0009-151-1	230 John Wesley Dobbs Ave	Atlanta	GA	30303
17-0225-LL-038-4	0 Johnson Rd NW	Atlanta	GA	30318
17-0225-LL-040-0	0 Johnson Rd NW	Atlanta	GA	30318
17-0225-LL-025-1	1125 Johnson Rd NW	Atlanta	GA	30318
17-0225-LL-012-9	1175 Johnson Road NW	Atlanta	GA	30318
14-0027-LL-134-8	2291 Jonesboro Rd	Atlanta	GA	30315
14-0028-LL-061-2	2471 Jonesboro Rd	Atlanta	GA	30315
14-0116-0010-085-1	0 Joseph E. Lowery Blvd SW	Atlanta	GA	30310
14-0117-0003-013-1	0 Joseph E. Lowery Blvd SW	Atlanta	GA	30310
14-0110-0007-015-9	135 Joseph E. Lowery Blvd SW	Atlanta	GA	30310
14-0116-0010-086-9	285 Joseph E. Lowery Blvd SW	Atlanta	GA	30310
14-0116-0010-119-8	295 Joseph E. Lowery Blvd SW	Atlanta	GA	30310
14-0117-0003-054-5	325 Joseph E. Lowery Blvd SW	Atlanta	GA	30310
14-0117-0003-057-8	435 Joseph E. Lowery Blvd SW	Atlanta	GA	30310
14F-0029-LL-039-1	0 Kimberly Rd	Atlanta	GA	30331
14F-0029-LL-040-9	0 Kimberly Rd	Atlanta	GA	30331
14F-0029-LL-038-3	1371 Kimberly Rd	Atlanta	GA	30331
14F-0029-LL-041-7	1371 Kimberly Rd	Atlanta	GA	30331
14F-0029-LL-029-2	1381 Kimberly Rd	Atlanta	GA	30331
15-180-01-006	0 Lakeside Village Dr	Atlanta	GA	30317
14-0117-LL-001-0	406 Lawton St	Atlanta	GA	30310

Attachment, Certification for a Drug-Free Workplace (HUD-50070)
AHA-Owned Facilities and Land (as of March 17, 2016)

Parcel ID	Address	City	State	Zip Code
14-0108-0007-049-2	0 Lee St SW	Atlanta	GA	30310
14-0005-0002-066-5	2413 Leila Lane	Atlanta	GA	30315
14-0047-0004-099-4	0 Linden Ave	Atlanta	GA	30308
14-0006-LL-065-9	2405 Locust Lane SE	Atlanta	GA	30315
17-0190-LL-040-1	0 Lois St NW	Atlanta	GA	30318
14-0117-0006-094-8	0 Lucile Ave	Atlanta	GA	30310
14-0117-0006-103-7	0 Lucile Ave	Atlanta	GA	30310
14-0079-0006-017-5	0 Luckie St NW	Atlanta	GA	30313
14-0079-0001-021-2	523 Luckie St NW	Atlanta	GA	30313
14-0110-0007-058-9	0 Magnolia St NW	Atlanta	GA	30314
14-0110-0009-003-3	760 Magnolia St	Atlanta	GA	30314
14-0110-0009-002-5	768 Magnolia St	Atlanta	GA	30314
14-0110-0007-056-3	892 Magnolia St	Atlanta	GA	30314
17-0048-LL-035-5	760 Marian Rd	Atlanta	GA	30324
17-0244-0001-029-8	2295 Marietta Rd NW	Atlanta	GA	30318
14-0053-0002-003-9	0 Martin St	Atlanta	GA	30312
14-0053-0002-067-4	0 Martin St	Atlanta	GA	30312
14-0053-0001-101-2	371 Martin St	Atlanta	GA	30312
14-0205-0001-076-3	2610 Martin Luther King Jr Dr SW	Atlanta	GA	30311
14-0085-LL-006-7	0 McDaniel St	Atlanta	GA	30312
14-0085-LL-028-1	0 McDaniel St	Atlanta	GA	30310
14-0085-LL-029-9	0 McDaniel St	Atlanta	GA	30310
14-0085-LL-030-7	0 McDaniel St	Atlanta	GA	30310
14-0085-LL-031-5	0 McDaniel St	Atlanta	GA	30310
14-0108-LL-002-9	365 McDaniel St	Atlanta	GA	30313
14-0086-0002-081-6	749 McDaniel St	Atlanta	GA	30310
14-0008-LL-016-0	0 McDonough Blvd	Atlanta	GA	30315
14-0008-LL-022-8	0 McDonough Blvd	Atlanta	GA	30315
14-0072-LL-043-5	0 Meldon Ave	Atlanta	GA	30315
15-180-02-018	0 Memorial Dr SE	Atlanta	GA	30317
14-0044-0001-109-7	0 Memorial Dr SE	Atlanta	GA	30312
14-0052-0008-040-6	0 Memorial Dr SE	Atlanta	GA	30312
14-0053-0002-066-6	0 Memorial Dr SE	Atlanta	GA	30312
14-0052-0008-034-9	22 Memorial Dr SE	Atlanta	GA	30312
14-0053-0002-001-3	175 Memorial Dr SE	Atlanta	GA	30312
14-0044-0001-016-4	341 Memorial Dr SE	Atlanta	GA	30312
14-0044-0001-108-9	359 Memorial Dr SE	Atlanta	GA	30312
14-0044-0001-101-4	361 Memorial Dr SE	Atlanta	GA	30312
14-0044-0001-099-0	363 Memorial Dr SE	Atlanta	GA	30312
14-0044-0001-022-2	381 Memorial Dr SE	Atlanta	GA	30312
15-180-01-005	2143 Memorial Dr SE	Atlanta	GA	30317
14-0079-0002-024-5	0 Merritts Ave	Atlanta	GA	30313
14-0008-LL-015-2	1773 Moreland Ave	Atlanta	GA	30315
14-0072-LL-044-3	0 Moury Ave SE	Atlanta	GA	30315
14-0072-LL-045-0	0 Moury Ave SE	Atlanta	GA	30315
14-0072-LL-046-8	0 Moury Ave SE	Atlanta	GA	30315
14-0072-LL-047-6	0 Moury Ave SE	Atlanta	GA	30315
14-0072-LL-048-4	0 Moury Ave SE	Atlanta	GA	30315
14-0072-LL-049-2	0 Moury Ave SE	Atlanta	GA	30315
14-0072-LL-050-0	0 Moury Ave SE	Atlanta	GA	30315

Attachment, Certification for a Drug-Free Workplace (HUD-50070)
AHA-Owned Facilities and Land (as of March 17, 2016)

Parcel ID	Address	City	State	Zip Code
14-0072-LL-051-8	0 Moury Ave SE	Atlanta	GA	30315
14-0072-LL-023-7	174 Moury St	Atlanta	GA	30315
14-0072-0006-089-1	0 New South Pryor Rd	Atlanta	GA	30315
14-0072-0006-095-8	1765 New South Pryor Rd	Atlanta	GA	30315
14-0047-0001-001-3	301 North Ave NE	Atlanta	GA	30354
14-0047-0001-092-2	311 North Ave NE	Atlanta	GA	30354
14-0047-LL-001-5	361 North Ave NE	Atlanta	GA	30308
14-0081-0001-112-5	0 Northside Dr	Atlanta	GA	30318
17-0149-0008-125-3	0 Northside Dr	Atlanta	GA	30318
14-0044-0001-024-8	0 Oakland Ave SE	Atlanta	GA	30312
14-0044-0001-023-0	303 Oakland Ave SE	Atlanta	GA	30312
14-0108-0003-050-4	899 Park St SW	Atlanta	GA	30310
14-0109-LL-032-5	700 Parsons Street	Atlanta	GA	30314
14-0110-LL-001-7	60 Paschal Blvd	Atlanta	GA	30314
14-0110-LL-003-3	60 Paschal Blvd	Atlanta	GA	30314
17-0111-0005-066-6	2240 Peachtree Rd NW	Atlanta	GA	30309
17-0227-LL-073-9	0 Perry Blvd NW	Atlanta	GA	30318
17-0227-LL-077-0	0 Perry Blvd NW	Atlanta	GA	30318
17-0227-LL-011-9	1800 Perry Blvd NW	Atlanta	GA	30318
17-0227-LL-026-7	1810 Perry Blvd NW	Atlanta	GA	30318
17-0228-LL-022-5	2000 Perry Blvd NW	Atlanta	GA	30318
17-0055-0002-018-8	1422 Piedmont Ave NE	Atlanta	GA	30309
17-0098-LL-062-8	3603 Piedmont Rd NE	Atlanta	GA	30305
14-0079-0002-010-4	0 Pine St NW	Atlanta	GA	30313
14-0079-0002-011-2	0 Pine St NW	Atlanta	GA	30313
14-0079-0002-012-0	0 Pine St NW	Atlanta	GA	30313
14-0079-0002-013-8	0 Pine St NW	Atlanta	GA	30313
14-0079-0002-014-6	0 Pine St NW	Atlanta	GA	30313
14F-0026-LL-028-7	658 Plainville Drive SW	Atlanta	GA	30331
14-0072-0002-031-7	0 Pryor Rd SW	Atlanta	GA	30315
14-0072-LL-057-8	0 Pryor Rd SW	Atlanta	GA	30315
14-0072-LL-033-6	0 Pryor St SE	Atlanta	GA	30315
14-0072-LL-034-4	0 Pryor St SE	Atlanta	GA	30315
14-0072-LL-035-1	0 Pryor St SE	Atlanta	GA	30315
14-0072-LL-036-9	0 Pryor St SE	Atlanta	GA	30315
14-0072-LL-038-5	0 Pryor St SE	Atlanta	GA	30315
14-0072-LL-040-1	0 Pryor St SE	Atlanta	GA	30315
14-0072-LL-041-9	0 Pryor St SE	Atlanta	GA	30315
14-0072-LL-042-7	0 Pryor St SE	Atlanta	GA	30315
14-0072-LL-058-3	0 Pryor St SE	Atlanta	GA	30315
14-0072-0002-023-4	1531 Pryor Rd SW	Atlanta	GA	30315
14-0072-0002-007-7	1569 Pryor Rd SW	Atlanta	GA	30315
14-0072-0002-008-5	1599 Pryor Rd SW	Atlanta	GA	30315
14-0072-0002-012-7	1623 Pryor Rd SW	Atlanta	GA	30315
14-0075-0001-160-2	0 Ralph D. Abernathy Blvd SW	Atlanta	GA	30312
14-0053-0001-107-9	0 Rawson St	Atlanta	GA	30312
14-0053-LL-006-5	101 Rawson St	Atlanta	GA	30312
14-0085-0013-083-0	0 Ray Alley SW	Atlanta	GA	30312
14-0085-0013-113-5	0 Ray Alley SW	Atlanta	GA	30312
14-0076-0007-118-3	250 Richardson St	Atlanta	GA	30312

Attachment, Certification for a Drug-Free Workplace (HUD-50070)
AHA-Owned Facilities and Land (as of March 17, 2016)

Parcel ID	Address	City	State	Zip Code
17-0190-LL-035-1	0 Rockdale St NW	Atlanta	GA	30318
14-0033-0001-054-8	3698 Ruby H Harper Blvd	Atlanta	GA	30354
14-0072-0002-010-1	1543-1549 S Pryor Rd	Atlanta	GA	30315
14-0072-0002-033-3	1543-1549 S Pryor Rd	Atlanta	GA	30315
14-0117-0003-019-8	0 Sells Ave SW	Atlanta	GA	30310
14-0117-0003-067-7	0 Sells Ave SW	Atlanta	GA	30310
14-0117-0003-068-5	0 Sells Ave SW	Atlanta	GA	30310
14-0117-0003-069-3	0 Sells Ave SW	Atlanta	GA	30310
14-0110-0005-089-6	791 Spencer St NW	Atlanta	GA	30314
14-0110-0005-021-9	797 Spencer St NW	Atlanta	GA	30314
14-0110-0005-022-7	801 Spencer St NW	Atlanta	GA	30314
14-0110-0004-059-0	835 Spencer St NW	Atlanta	GA	30314
14-0110-0004-060-8	843 Spencer St NW	Atlanta	GA	30314
14-0110-0004-048-3	847 Spencer St NW	Atlanta	GA	30314
14-0110-0004-056-6	855 Spencer St NW	Atlanta	GA	30314
14-0110-0004-057-4	859 Spencer St NW	Atlanta	GA	30314
14-0110-0004-015-2	883 Spencer St NW	Atlanta	GA	30314
14-0110-0004-016-0	887 Spencer St NW	Atlanta	GA	30314
14-0110-0004-018-6	895 Spencer St NW	Atlanta	GA	30314
14-0079-0003-075-6	0 Techwood Dr	Atlanta	GA	30313
17-0106-0009-118-8	150 Tenth St NE	Atlanta	GA	30309
14-0026-0005-026-1	0 Thomasville Blvd	Atlanta	GA	30315
14-0026-0005-027-9	0 Thomasville Blvd	Atlanta	GA	30315
14-0026-LL-051-5	0 Thomasville Blvd	Atlanta	GA	30315
14-0110-0005-006-0	804 Thurmond St NW	Atlanta	GA	30314
14-0110-0004-053-3	834 Thurmond St NW	Atlanta	GA	30314
14-0110-0004-054-1	838 Thurmond St NW	Atlanta	GA	30314
14-0110-0004-064-0	842 Thurmond St NW	Atlanta	GA	30314
14-0110-0004-061-6	846 Thurmond St NW	Atlanta	GA	30314
14-0110-0004-062-4	850 Thurmond St NW	Atlanta	GA	30314
14-0007-0005-025-6	0 Velma St	Atlanta	GA	30315
14-0084-0005-090-6	136 Vine St	Atlanta	GA	30314
14-0084-0005-091-4	138 Vine St	Atlanta	GA	30314
14-0084-0005-051-8	140 Vine St	Atlanta	GA	30314
14-0084-0005-050-0	146 Vine St	Atlanta	GA	30314
14-0084-0005-049-2	152 Vine St	Atlanta	GA	30314
14-0084-0005-048-4	158 Vine St	Atlanta	GA	30314
14-0084-0005-095-5	162 Vine St	Atlanta	GA	30314
14-0084-0005-096-3	162 Vine St	Atlanta	GA	30314
14-0084-0005-046-8	168 Vine St	Atlanta	GA	30314
14-0084-0005-044-3	172 Vine St	Atlanta	GA	30314
14-0084-0005-034-4	175 Walnut St	Atlanta	GA	30314
14-0117-0005-061-8	0 West End Pl SW	Atlanta	GA	30310
14-0116-0010-027-3	0 Westview Dr SW	Atlanta	GA	30310
14-0116-0010-093-5	0 Westview Dr SW	Atlanta	GA	30310
14-0116-0010-096-8	0 Westview Dr SW	Atlanta	GA	30310
14-0116-0010-099-2	0 Westview Dr SW	Atlanta	GA	30310
14-0116-0010-114-9	0 Westview Dr SW	Atlanta	GA	30310
14-0117-0002-003-3	0 Westview Dr SW	Atlanta	GA	30310
14-0117-0002-007-4	0 Westview Dr SW	Atlanta	GA	30310

Attachment, Certification for a Drug-Free Workplace (HUD-50070)
AHA-Owned Facilities and Land (as of March 17, 2016)

Parcel ID	Address	City	State	Zip Code
14-0117-0002-008-2	0 Westview Dr SW	Atlanta	GA	30310
14-0117-0002-014-0	0 Westview Dr SW	Atlanta	GA	30310
14-0117-0002-104-9	0 Westview Dr SW	Atlanta	GA	30310
14-0117-0003-008-1	0 Westview Dr SW	Atlanta	GA	30310
14-0117-0003-010-7	926 Westview Dr SW	Atlanta	GA	30310
14-0117-0003-009-9	930 Westview Dr SW	Atlanta	GA	30310
14-0116-0010-089-3	931 Westview Dr SW	Atlanta	GA	30310
14-0116-0010-090-1	935 Westview Dr SW	Atlanta	GA	30310
14-0117-0003-007-3	938 Westview Dr SW	Atlanta	GA	30310
14-0116-0010-091-9	939 Westview Dr SW	Atlanta	GA	30310
14-0117-0003-064-4	940 Westview Dr SW	Atlanta	GA	30310
14-0116-0010-092-7	943 Westview Dr SW	Atlanta	GA	30310
14-0117-0003-004-0	944 Westview Dr SW	Atlanta	GA	30310
14-0117-0003-003-2	948 Westview Dr SW	Atlanta	GA	30310
14-0116-0010-094-3	949 Westview Dr SW	Atlanta	GA	30310
14-0117-0003-002-4	952 Westview Dr SW	Atlanta	GA	30310
14-0116-0010-095-0	953 Westview Dr SW	Atlanta	GA	30310
14-0116-0010-108-1	961 Westview Dr SW	Atlanta	GA	30310
14-0116-0010-100-8	975 Westview Dr SW	Atlanta	GA	30310
14-0116-0010-030-7	981 Westview Dr SW	Atlanta	GA	30310
14-0116-0010-029-9	985 Westview Dr SW	Atlanta	GA	30310
14-0116-0010-028-1	993 Westview Dr SW	Atlanta	GA	30310
14-0117-0002-016-5	1006 Westview Dr SW	Atlanta	GA	30310
14-0117-0002-015-7	1012 Westview Dr SW	Atlanta	GA	30310
14-0117-0002-013-2	1018 Westview Dr SW	Atlanta	GA	30310
14-0117-0002-012-4	1020 Westview Dr SW	Atlanta	GA	30310
14-0117-0002-011-6	1022 Westview Dr SW	Atlanta	GA	30310
14-0117-0002-010-8	1026 Westview Dr SW	Atlanta	GA	30310
14-0117-0002-009-0	1030 Westview Dr SW	Atlanta	GA	30310
14-0117-0002-006-6	1040 Westview Dr SW	Atlanta	GA	30310
14-0117-0002-005-8	1044 Westview Dr SW	Atlanta	GA	30310
14-0117-0002-004-1	1048 Westview Dr SW	Atlanta	GA	30310
14-0117-0002-002-5	1056 Westview Dr SW	Atlanta	GA	30310
14-0117-0002-001-7	1060 Westview Dr SW	Atlanta	GA	30310
14-0085-0013-079-8	0 Whitehall Terrace SW	Atlanta	GA	30312
14-0085-0013-081-4	0 Whitehall Terrace SW	Atlanta	GA	30312
14-0085-0013-082-2	0 Whitehall Terrace SW	Atlanta	GA	30312
14-0085-0013-105-1	0 Whitehall Terrace SW	Atlanta	GA	30312
14-0085-0013-107-7	0 Whitehall Terrace SW	Atlanta	GA	30312
14-0085-0013-110-1	0 Whitehall Terrace SW	Atlanta	GA	30312
14-0085-0013-108-5	584 Whitehall Terrace SW	Atlanta	GA	30312
14-0085-0013-114-3	592 Whitehall Terrace SW	Atlanta	GA	30312
14-0085-0013-119-2	602 Whitehall Terrace SW	Atlanta	GA	30312
14-0045-0001-029-6	0 Wm Holmes Borders Sr Dr	Atlanta	GA	30312
14-0053-0001-105-3	0 Woodward Ave SE	Atlanta	GA	30312
14-0053-0001-106-1	0 Woodward Ave SE	Atlanta	GA	30312
14-0053-0001-103-8	79 Woodward Ave SE	Atlanta	GA	30312

7. Public Review and Plan Changes

Public Review

Atlanta Housing Authority's (AHA) Fiscal Year 2017 Moving to Work (MTW) Annual Plan is the product of an inclusive annual planning process involving consultation with AHA's Board of Commissioners, executive leadership and employees, as well as AHA-assisted families. AHA further collaborates with strategic partners and service providers, state and local agencies, elected and public officials, as well as local community and housing advocacy organizations.

Notification of the FY 2017 MTW Annual Plan Availability and Public Hearing was communicated via public notices, letters, and electronic mail correspondence to Housing Choice Voucher Program participants, residents of AHA-Owned Residential Communities, AHA's Service Provider Network, and other key stakeholders. Additionally, to address the diversity of AHA residents in the AHA-Owned Residential Communities, the public hearing notice was distributed in English, Chinese, Korean, Russian and Spanish.

Notices appeared as advertisements in the following mass media publications on the dates specified below:

The Atlanta Journal-Constitution

February 28, 2016

March 6, 2016

Atlanta Daily World

February 25, 2016

The Atlanta Voice

February 26, 2016

Daily Report

February 24, 2016

February 29, 2016

March 7, 2016

Mundo Hispanico

February 25, 2016

The Champion Newspaper

March 3, 2016

On Tuesday, March 8, 2016, AHA held a public hearing to present its proposed FY 2017 MTW Annual Plan and policy changes. The public hearing was held at AHA's corporate office (230 John Wesley Dobbs Avenue, Atlanta, Georgia), where 51 people attended, including AHA staff. For elderly and disabled residents living in the AHA-Owned Residential Communities who were unable to attend the public hearing, AHA broadcast a video of the event on AHA's local community channel until the public comment period closed. At the public hearing, AHA provided sign-language interpretation and reasonable accommodation for hearing and visually impaired attendees.

The comment and review period for the draft FY 2017 MTW Annual Plan was February 18, 2016 through March 19, 2016 (31 days). The Plan was made available in printed form at AHA's corporate office and AHA-Owned Residential Communities and electronically via AHA's website. Additionally, printed and electronic copies were provided to organizations that participated in briefing sessions, as listed below. Comments could be submitted in-person at the hearing or briefing; in writing (hand-delivered or via U.S. mail to AHA's corporate office); electronically via fax, the website, or email; or by phone on a dedicated voice mailbox.

During the public review period ended March 19, 2016, comments and suggestions were received by AHA and were considered in the final version of the Plan as presented for approval by the AHA Board of Commissioners.

BRIEFING SESSIONS & STAKEHOLDER COMMUNICATION FY 2017 MTW ANNUAL PLAN	
February 17, 2016	Jurisdiction-wide Resident Council
February 24, 2016	Partners and Stakeholders Formal Electronic Notice and link to the Draft Plan <ul style="list-style-type: none"> • AHA Service Provider Network • Landlord Advisory Group • Property Management/Developers (PMDs) <ul style="list-style-type: none"> – Columbia Residential – The Integral Group – The Michaels Group • Other AHA partners and community stakeholders
March 2, 2016	Public and Elected Officials HUD Atlanta Field Office Atlanta Public Schools – Board of Education City of Atlanta <ul style="list-style-type: none"> • Mayor’s Cabinet • Atlanta City Council • Atlanta Police Department
March 2, 2016	Real Estate and Development Partners <ul style="list-style-type: none"> • Atlanta Beltline, Inc. • City of Atlanta Department of Planning & Community Development • Invest Atlanta
March 3, 2016	Advocacy Groups <ul style="list-style-type: none"> • Atlanta Legal Aid Society • Georgia Law Center for the Homeless
March 8, 2016	Public Hearing

Plan Changes

Moving forward, AHA may make changes to the MTW Annual Plan without a public hearing or resident consultation provided that such changes do not constitute a “substantial deviation” or “significant amendment or modification.” A “substantial deviation” or “significant amendment or modification” to the Plan is defined as changes, modifications, or amendments that materially and significantly modify AHA’s business plan goals or priority activities. A change in AHA’s objectives or strategies in reaching those goals will not be considered a “substantial deviation” or “significant amendment or modification.”

AHA Program Benchmarks

Source: Legacy Attachment D, MTW Program Benchmarks and MTW Program Benchmark Definitions

Reference: AHA's Amended and Restated Moving to Work Agreement, January 16, 2009

Description: The following table outlines AHA's performance benchmarks as set forth in Legacy Attachment D.

Performance Measure Definition	FY 2017 Benchmark
Public Housing Program	
Percent Rents Uncollected Gross tenant rents receivable for the Fiscal Year (FY) divided by the amount of tenant rents billed during the FY shall be less than or equal to the target benchmark.	$\leq 2\%$
Occupancy Rate The ratio of occupied public housing units to available units as of the last day of the FY will be greater than or equal to the target benchmark.	$\geq 98\%$
Emergency Work Orders Completed or Abated in <24 Hours The percentage of emergency work orders that are completed or abated within 24 hours of issuance of the work order shall be greater than or equal to the target benchmark. (Abated is defined as "emergency resolved through temporary measure, and a work order for long term resolution has been issued.")	$\geq 99\%$
Routine Work Orders Completed in ≤ 7 Days The average number of days that all non-emergency work orders will be active during the FY shall be less than or equal to 7 days.	≤ 7 days
Percent Planned Inspections Completed The percentage of all occupied units and common areas that are inspected during the FY shall be greater than or equal to the target benchmark.	100%
Housing Choice Program (Section 8)	
Budget Utilization Rate The expenditure of FY 2016 Housing Choice MTW vouchers annual budget allocation (i.e. HUD disbursements) for MTW-eligible activities will be greater than or equal to the target benchmark of 98%.	$\geq 98\%$
Percent Planned Annual Inspections Completed The percentage of all occupied units under contract that are inspected directly by AHA or any other agency responsible for monitoring the property during the FY shall be greater than or equal to the target benchmark by the last day of the Fiscal Year.	$\geq 98\%$
Quality Control Inspections The percentage of all previously inspected units having a quality control inspection during the FY shall be greater than or equal to the target benchmark.	$\geq 1.4\%$

AHA Program Benchmarks

Performance Measure Definition	FY 2017 Benchmark
Community and Supportive Services	
Resident Homeownership The number of Public Housing residents or Housing Choice Voucher participants, and other income eligible families who closed on purchasing a home during the Fiscal Year, regardless of participation in a homeownership counseling program, shall be greater than or equal to the target benchmark.	12
Household Work / Program Compliance The annual percentage of Public Housing and Housing Choice assisted households that are Work/Program compliant (excluding elderly and disabled members of the households) through the last day of the Fiscal Year shall be greater than or equal to the target benchmark.	75%
Finance	
Project Based Financing Closings The annual number of projects to which AHA will commit project-based rental assistance and/or make an investment of MTW funds.	6

Approved MTW Implementation Protocols

Source: Legacy Attachment E, Implementation Protocols

Reference: AHA's Amended and Restated Moving to Work Agreement, January 16, 2009

Description: As set forth in Legacy Attachment E of AHA's MTW Agreement, AHA has developed, in collaboration with HUD, implementation protocols related to the authorizations set for the in AHA's Legacy and Community Specific Authorizations as set forth in Attachment D. Specific sources and references are included in each description below.

MTW Implementation Protocol	Amended and Restated MTW Agreement Reference
ACC Waiver	<i>Article I - Statutory Authorizations; Legacy Attachment A - Calculation of Subsidies; Legacy Attachment B - Elements for the Annual MTW Plan and Annual MTW Report; Attachment D - Legacy and Community Specific Authorizations; Attachment E – Implementation Protocols; and the Second Amendment.</i>
Alternate Resident Survey	<i>Legacy Attachment B - Elements for the Annual MTW Plan and Annual MTW Report, Section IX.</i>
Designation of Senior Public Housing Developments	<i>In accordance with the provision of the MTW Agreement's Statement of Authorizations, Section III.A, AHA is authorized to define its own occupancy policies. AHA discussed its plans to implement designations in its FY 2005, FY 2006, and FY 2007 MTW Annual Plans.</i>
Disposition of Public Housing Operating Subsidy in AHA-Owned Affordable Communities	<i>Pursuant to Article VI, Section C of the Statement of Authorizations (Appendix A of the MTW Agreement), AHA, in consultation with HUD, may convert, as appropriate and feasible, all or a portion of its public housing assisted units from public housing operating subsidy under Section 9 of the 1937 Act to project based rental assistance under Section 8 of the 1937 Act. This initiative is referred to as the Project Based Financing Demonstration in the MTW Agreement.</i>
Disposition of Public Housing Operating Subsidy in AHA-Sponsored Mixed-Finance Communities	<i>Pursuant to Article VI, Section C of the Statement of Authorizations (Appendix A of the MTW Agreement), AHA, in consultation with HUD, may convert, as appropriate and feasible, all or a portion of its public housing assisted units from public housing operating subsidy under Section 9 of the 1937 Act to project-based rental assistance under Section 8 of the 1937 Act. This initiative is referred to as the Project Based Financing Demonstration in the MTW Agreement.</i>
Fee for Service Methodology	<i>Attachment D - Legacy and Community Specific Authorizations, Sections V.A.2 and VI; and First Amendment, Section 4.</i>
HOPE VI and Other HUD-Funded Master Planned On and Off-site Developments Site and Neighborhood Standards	<i>In accordance with the provision of the Section VIII.C.1 of Attachment D of the AHA's MTW Agreement, the regulatory requirements of 24 CFR Part 941 shall not apply to the implementation of the activities of AHA except for the provisions of 24 CFR 941.202, 24 CFR 941.207, 24 CFR 941.208, 24 CFR 941.209, 24 CFR 941.602(d), 24 CFR 941.610(b) all as modified by the terms of Attachment D; provided, however, that in determining the location of six or more newly constructed or substantially rehabilitated units or developments, AHA is authorized to adopt the alternative Site and Neighborhood Standards set forth in Section VII.B.3 of Attachment D of AHA's MTW Agreement.</i>
HUD Funding Availability	<i>In accordance with the provisions of Sections I.I, III.A, V.A of Attachment D of AHA's MTW Agreement, AHA has the flexibility to pursue locally driven policies, procedures and programs to develop more efficient ways of providing housing assistance to low- and very-low income families; to expand, improve and diversify AHA's portfolio and to provide flexibility in the design and administration of housing assistance to eligible families while reducing costs and achieving greater cost effectiveness.</i>

Approved MTW Implementation Protocols

MTW Implementation Protocols	Amended and Restated MTW Agreement Reference
Identity of Interest	<i>Attachment D - Legacy and Community Specific Authorizations, Section VIII.C.</i>
MTW Mixed-Finance Closing Procedures	<i>Attachment D - Legacy and Community Specific Authorizations, Section V.A.2.</i>
Process for Managing Replacement Housing Factor (RHF) Funds	<i>In accordance with Section V.A.1 of Attachment D of AHA's MTW Agreement, AHA is authorized to combine operating subsidies provided under Section 9 of the 1937 Act (42 U.S.C. 1437g), capital funding (including development and replacement housing factor funds) provided under Section 14 of the 1937 Act (42 U.S.C. 1437l) and assistance provided under Section 8 of the 1937 Act for the voucher programs (42 U.S.C. 1437f) to fund HUD approved MTW activities. AHA has elected to follow HUD guidance in its use as outlined in Sections V.A.1 and V.A.5 of AHA's MTW Agreement and this protocol.</i>
Program Flexibility for Special Purpose Vouchers	<i>Article I - Statutory Authorizations, Section D; and Attachment D - Legacy and Community Specific Authorizations, Sections V.A.1 VII.A.</i>
Project-Based Rental Assistance Developer Selection	<i>Section VII.B of Attachment D of AHA's MTW Agreement authorizes AHA to develop and adopt a reasonable policy and process for providing Section 8 project-based rental assistance during the term of AHA's MTW Agreement; this includes the establishment of a reasonable competitive process for selection of developers. AHA is also authorized to exempt itself or development sponsors from the need to participate in a competitive process to provide project-based rental assistance at a community where (i) AHA has a direct or indirect ownership interest in the entity that owns the community; (ii) AHA owns the land on which the community has been or is to be developed; or (iii) AHA is funding a portion of the construction costs of the community and subsidizing the operating costs or rents of the community for low-income families. Project Based Rental Assistance as a Development Tool has been included in AHA's Annual MTW Plans since FY 2006.</i>
Project-Based Rental Assistance Subsidy Layering Review	<i>In accordance with the provisions of AHA's Amended and Restated MTW Agreement, Attachment D, Section VII. B.10, "AHA shall be authorized to perform subsidy layering reviews for Section 8 project-based rental assistance properties; provided, however, that AHA shall identify and engage in independent third party to do the subsidy layering review where AHA is the direct or indirect owner of the property."</i>
Revision of MTW Benchmarks	<i>Legacy Attachment D - MTW Program Benchmarks and MTW Program Benchmark Definitions</i>
Use of MTW Funds	<i>Recitals; Article I - Statutory Authorizations, Sections A, B and D; Article II - Requirements and Covenants, Sections B and D; Attachment D - Legacy and Community Specific Authorizations, Sections I.G, I.I, V.A.1, V.A.2, V.A.4, V.A.5, V.C.2, V.C.3, VII.B.4, VII.C.4, and VIII.B.5; Legacy Attachment G, Good Cause Justification for the Waiver of Sections of 24 CFR 941 and the Second Amendment.</i>

Local Asset Management Program

Background and Introduction

The Amended and Restated Moving to Work Agreement, effective as of November 13, 2008, as further amended by the Second Amendment to the Moving to Work Agreement, effective as of January 16, 2009 authorizes AHA to design and implement a Local Asset Management Program for its Public Housing Program and describe such program in its Annual MTW Plan. The term “Public Housing Program” means the operation of properties owned or units in mixed-income communities subsidized under Section 9 of the U.S. Housing Act of 1937, as amended (“1937 Act”) by the Agency that are required by the 1937 Act to be subject to a public housing declaration of trust in favor of HUD. The Agency’s Local Asset Management Program shall include a description of how it is implementing project-based property management, budgeting, accounting, financial management and any deviations from HUD’s asset management requirements. Under the First Amendment to the MTW Agreement, AHA agreed to describe its cost accounting plan as part of its Local Asset Management Program including how the indirect cost fee for service rate is determined and applied.

Project-Based Approach for Public Housing Program

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

In addition, each mixed-income, mixed-financed (MIMF) rental community that contain authority assisted units under the Public Housing Program are owned, managed and operated by third party partnerships as established at the time each of the transactions were structured. AHA maintains a separate budget and accounting for the operating subsidy paid to the owners of these communities, but does not maintain the accounting for property operations as AHA does not own or operate these properties.

Identification of Cost Allocation Approach

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

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

Classification of Costs

There is no universal rule for classifying certain costs as either direct or indirect under every accounting system. A cost may be direct with respect to some specific service or function, but indirect with respect to the Federal award or other final cost objective. Therefore, the definitions and guidelines provided in this Local Asset Management Program are used for determining direct and indirect costs charged to the cost objectives.

Definitions:

Cost Objective – Cost objective is a function, organizational subdivision, contract, grant, or other activities for which cost data are needed and for which costs are incurred.

Direct Costs – Direct costs are those that can be identified specifically with a particular final cost objective.

Local Asset Management Program

Indirect Costs – Indirect costs are those: (a) incurred for a common or joint purpose benefitting more than one cost objective, and (b) not readily assignable to the cost objectives specifically benefitted, without effort disproportionate to the results achieved. After direct costs have been determined and assigned directly to Federal awards and other activities, as appropriate, indirect costs are determined as those remaining cost to be allocated to the benefitted cost objectives.

Indirect Cost Fee for Service Rates – Fee for service is used for determining in a reasonable manner, the proportion of indirect costs each cost objective should bear. It is the ratio (expressed as a percentage) of the indirect costs to a direct cost base.

Cost Base – A cost base is the accumulated direct costs (normally either total direct salaries and wages or total direct costs exclusive of any extraordinary or distorting expenditures) used to distribute indirect costs to cost objectives (Federal awards). Generally, the direct cost base selected should result in each award bearing a fair share of the indirect costs in reasonable relation to the benefits received from the costs.

AHA Cost Objectives

AHA has identified the following cost objectives:

Direct Costs:

MTW Program - MTW Program and all associated activities funded under the MTW Single Fund authority as a **single cost objective**. The single cost objective is the eligible MTW activities as articulated in AHA's MTW Agreement and Annual MTW Plan.

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

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

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

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

Local Asset Management Program

AHA Direct Costs

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

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

1. Contract costs readily identifiable with delivering housing assistance to low income families under the MTW Program,
2. Housing Assistance Payments (including utility allowances) for tenant based voucher and AHA PBRA supported communities,
3. Portability administrative fees,
4. Homeownership voucher funding,
5. Foreclosure and emergency assistance for low income families served under the Housing Choice Voucher Program,
6. AHA costs for administering Housing Choice Tenant Based vouchers including inspection activities
7. Operating costs directly attributable to operating AHA-owned properties,
8. Capital improvement costs at AHA-owned properties
9. Operating subsidies paid to MIMF properties,
10. AHA costs associated with managing AHA-owned properties, PBRA, Housing Choice Homeownership vouchers, MIMF properties and other AHA-owned real estate,
11. AHA costs directly attributable to MTW Program activities, including the administration of human development and supportive services programs,
12. AHA costs associated with development and revitalization activities with costs as defined in the next section, but paid using MTW Single Fund
13. Any other activities that can be readily identifiable with delivering housing assistance to low-income families under the MTW Program.

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

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

Local Asset Management Program

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

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

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

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

Direct Costs – Substitute System for Compensation of Personnel Services

In addition to the direct costs identified previously, AHA will allocate direct salary and wages based upon quantifiable measures (substitute system) of employee effort rather than timesheets. This substitute system is allowed under 2 CFR Part 200, Section 200.430. The substitute system allows AHA to more efficiently and effectively allocate direct costs on measures that are readily determined for each department. Those departments and measures will be re-evaluated periodically and updated as necessary. The Operating Divisions functions and measures effective July 1, 2016 are listed below:

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

AHA Fee for Service

Corporate Support consists of administrative and support departments which support the Operating Divisions and AHA as a whole. AHA establishes a Fee for Service Rate based on the anticipated indirect cost for the fiscal year. The fee for service rate is determined in a reasonable manner where the proportion of indirect costs for each cost objective is determined as a ratio of the indirect costs to a direct cost base. The resulting amount is the fee for service amount to be charged to programs not funded by the MTW Single Fund. Based on current budget estimates, AHA projects the indirect cost fee to be approximately 9% of total direct costs.

Limitation on indirect cost or administrative costs – AHA recognizes that there may be limitations on the amount of administrative or indirect costs that can be charged to specific grant awards. Should such limitations prevent the charging of direct and indirect costs to a grant award, AHA will charge such costs to the remaining cost objectives as defined in this Local Asset Management Program, while ensuring that only authorized expenditures are charged to the cost objectives and their related funding sources. AHA ensures that no costs are charged to federal funds unless authorized under federal law or regulation.

Local Asset Management Program

Implementation of AHA's Local Asset Management Program

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

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

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

AHA is required to describe any differences between the Local Asset Management Program and HUD's asset management requirements in its Annual MTW Plan in order to facilitate the recording of actual property costs and submission of such cost information to HUD:

1. AHA implemented a fee for service system that was more comprehensive than HUD's asset management system. HUD's system was limited in focusing only on a fee-for-service system at the property level and failed to address AHA's comprehensive operation which includes other programs and business activities. AHA's MTW Program is much broader than Public Housing properties and includes activities not found in traditional HUD Programs. This Local Asset Management Program Plan addresses the entire AHA operation.
2. AHA defined its cost objectives at a different level than HUD's asset management system. Specifically, AHA defined the MTW Program as a cost objective which is consistent with the issuance of the CFDA number. HUD defined its cost objective at the property level which fails to recognize the overall effort required to deliver the housing resources to Low Income families under the MTW Program. Because the cost objectives are defined differently, direct and indirect costs are defined based on the cost objectives identified in this Local Asset Management Program.

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Appendix D: Housing Opportunities Information

1. Housing Opportunities and Households Served

As defined in AHA's MTW Agreement and Protocols, Households Served includes all AHA-assisted households ("AHA Families") plus low-income families living in affordable housing facilitated by AHA's investments. This includes Low-Income Housing Tax Credit units, down payment assistance (homeownership), and other services and forms of assistance.

Community & Program Type	Type of Assistance ⁽⁵⁾	Household Totals		
		Actual End of FY 2015*	Projected End of FY 2016	Projected End of FY 2017
AHA-Owned Residential Communities	PH ⁽¹⁾	1,942	1,939	1,793
AHA-Sponsored Mixed-Income Communities	PH ⁽¹⁾	2,221	2,221	2,221
	PBRA ^(1,6)	1,748	1,769	1,769
	LIHTC-only ⁽⁶⁾	1,167	1,149	1,149
PBRA Communities	PBRA ⁽⁶⁾	3,244	3,264	3,571
	LIHTC-only ⁽⁶⁾	1,494	1,484	1,595
Housing Choice Tenant-Based ⁽²⁾	HCV	7,526	7,753	7,942
Housing Choice Ports ⁽³⁾	HCV	2,016	1,976	1,986
Housing Choice Homeownership	HCV	37	35	10
Homeownership - Other ⁽⁴⁾	Downpayment	384	438	488
TOTAL ⁽⁷⁾		21,779	22,028	22,524

NOTES:

PH = Public Housing (ACC-assisted), PBRA= Project Based Rental Assistance, LIHTC-only = Low-Income Housing Tax Credits only, HCV= Housing Choice Voucher

* Sources: FY 2015 MTW Annual Report.

⁽¹⁾ PH Units decreasing due to implementation of RAD at Juniper and Tenth Highrise and AHA's Reformulation Demonstration Program at Centennial Place.

⁽²⁾ Housing Choice Tenant-Based includes 300 Family Unification Program (FUP) vouchers, 225 Mainstream vouchers, 240 HUD VASH vouchers and port-ins being administered by AHA for other PHAs. Also includes other voucher-funded supportive housing programs.

⁽³⁾ Changes in Housing Choice Ports are partially due to absorption of the vouchers by other PHAs and households with AHA vouchers that return to AHA's jurisdiction (i.e. no longer porting).

⁽⁴⁾ Homeownership - Other category includes down payment assistance through various AHA programs.

⁽⁵⁾ AHA does not have any non-MTW PH or PBRA units in its portfolio. Most PH and PBRA-assisted units in mixed-income, mixed-finance communities are developed using low income housing tax credit equity and are also tax credit units. For reporting purposes, these units are categorized only as PH or PBRA units (not as LIHTC-only units).

⁽⁶⁾ Changes in PBRA and LIHTC-only are due to added units and shifts between types of assistance on a unit within a community.

⁽⁷⁾ Overall, AHA projects an increase in households served in the Housing Choice Voucher Program, Supportive Housing Programs and new units from PBRA Communities.

2. Household Characteristics (actuals as of June 30, 2015)

Community & Program Type	Number of Households									
	by Unit/Family Size					by Income Group (percent of Area Median Income - AMI)				TOTAL
	0/1	2	3	4	5+	< 30%	30 - 50%	50 - 80%	> 80%	
AHA-Owned Residential Communities	1,746	129	25	16	10	1,620	265	34	7	1,926
AHA-Sponsored Mixed-Income Communities ⁽¹⁾	2,118	759	550	254	130	2,603	984	210	14	3,811
PBRA Communities ⁽¹⁾	2,330	436	222	123	58	2,237	757	174	1	3,169
Housing Choice Tenant-Based	2,327	1,680	1,437	1,045	1,037	5,735	1,326	440	25	7,526
Housing Choice ⁽²⁾ Ports	404	345	397	423	447	1,798	192	25	1	2,016
TOTAL	8,925	3,349	2,631	1,861	1,682	13,993	3,524	883	48	18,448

NOTES:

⁽¹⁾ AHA does not capture household characteristics for LIHTC-only units within AHA-Sponsored Mixed-Income Communities and PBRA Communities.

Appendix D: Housing Opportunities

Appendix D
3 of 32

3. Waiting List Characteristics (actuals as of June 30, 2015)

	Waiting List Households by Income Group (% of Area Median Income)				Waiting List Households by Unit Size Requested (# of Bedrooms)					Waiting List Households by Family Size (# of Members)					
Community & Program Type*	<30%	30-50%	50-80%	>80%	Studio	1 BR	2 BR	3 BR	4+ BR	1	2	3	4	5+	TOTAL
AHA-Owned Residential Communities	3,065	297	85	6		3,017	264	106	66						3,453
AHA-Sponsored Mixed-Income Communities	12,862	21,119	1,360	197	851	10,172	14,200	9,452	903						35,578
PBRA Communities ⁽¹⁾	3,090	2,940	1,743	194	2	3,076	2,303	2,081	505						7,967
Housing Choice ⁽²⁾⁽³⁾ Tenant-Based	5,994	1,466	457	83						1,534	1,756	1,317	778	615	6,000
TOTAL	25,011	25,822	3,645	480	853	16,265	16,767	11,639	1,474	1,534	1,756	1,317	778	615	52,998

NOTES:

* Using flexibilities afforded to AHA under its MTW Agreement with HUD, waiting lists (except the Housing Choice Tenant-Based Program) are maintained by partners as part of AHA's site-based administration policies.

⁽¹⁾ Numbers shown do not include data for Supportive Housing communities that are leased through referrals from a service contracted provider that provides supportive services to the target population.

⁽²⁾ AHA does not capture waiting list data on the Mainstream waiting list and does not maintain FUP or VASH waiting lists, because these special purpose vouchers are issued through referrals from the public child welfare agency (PCWA) under agreement with AHA or the Veterans Administration, respectively.

4a. Units to be Added (during FY 2017)

		Units by Bedroom Size					
Community	Type of Assistance	Studio	1 BR	2 BR	3 BR	4+ BR	TOTAL Units
Reynoldstown Senior Residences	PBRA		17	9			26
The Remington	PBRA		110	50			160
The Veranda at Groveway	PBRA		30	1			31
TOTAL		0	157	60	0	0	217

4b. Units to be Removed (during FY 2017)

		Units by Bedroom Size					
Community	Type of Assistance	Studio	1 BR	2 BR	3 BR	4+ BR	TOTAL Units
Juniper and Tenth Highrise	PH	86	63	0	0	0	149
TOTAL		86	63	0	0	0	149

NOTES:

PH = Public Housing (ACC-assisted), PBRA= Project Based Rental Assistance, HCV= Housing Choice Voucher

5. Leasing and Waiting List Information

Since the start of the Moving To Work Demonstration, AHA has gauged its progress annually through established performance benchmark goals guided by AHA's Revision of the MTW Benchmarks Protocol which outlines a set of performance measures and target goals for AHA's reporting.

Community & Program Type	Potential Issues Leasing Units	Potential Changes in Waiting Lists
AHA-Owned Residential Communities	Due to RAD conversions, AHA may stop leasing units at one or more properties in order to create vacancies to facilitate movement of residents during the renovation projects planned for the communities.	<p>AHA engages in recurring dialog with its Property Management-Developer (PMD) partners to ensure that they maintain adequate and appropriate waiting lists to optimize community occupancy at AHA-Owned Residential Communities. Procedures relative to waiting lists are working well and will continue in FY 2017.</p> <p>AHA does not anticipate any significant changes to the number of families on the waiting list.</p>
AHA-Sponsored Mixed-Income Communities, PBRA Communities, & Supportive Housing	The Owners and Management Agents are responsible for all aspects of leasing and occupancy of the assisted units. While it is difficult to project any potential leasing issues, through its Portfolio Management function and property management oversight functions, AHA will continue to monitor the performance benchmarks for the entire portfolio and work with the Owners and Management Agents to address any adverse trends.	<p>The waiting lists at these communities are administered at the sites by the respective Owners and Management Agents. Each is responsible for the opening, closing, ongoing maintenance and purging the site-based waiting list pursuant to their business needs and as defined in their management procedures.</p> <p>AHA is not able to assess the potential change in the number of families on the waiting list since the Owners and Management Agents may, at any time, decide to open or purge the site-based waiting list.</p>
Housing Choice Tenant-Based	The vacancy rate in AHA's jurisdiction in multifamily properties is reported at an average of 5%. In light of the tight local rental market, AHA will monitor market conditions and continue to utilize its MTW flexibility to implement innovative leasing strategies to create additional quality housing opportunities for families.	During FY 2015, AHA opened its waiting list and began pulling from the 2015 waiting list. AHA expects to continue pulling from and exhaust the 2015 waiting list in FY 2017 with a goal of housing 800 new families, subject to funding availability. AHA expects to open the Housing Choice waiting list in FY 2017 and create a new waiting list. AHA is exploring the use of a system of local preferences in conjunction with the opening of the waiting list.

6. AHA-Owned, Managed, and Sponsored Communities and Properties (as of March 17, 2016)

Definitions:

- PH = Public Housing (ACC-assisted) units
- PBRA = Project Based Rental Assistance units (AHA's MTW-Approved Program)
- LIHTC = Low-Income Housing Tax Credit units. Most PH and PBRA-assisted units in mixed-income, mixed-finance communities are developed using low income tax credit equity and are also tax credit units. For reporting purposes, these units are categorized as PH or PBRA units (not as LIHTC-only units).

AHA-Owned Residential Communities

AHA's public housing residential communities serving mostly seniors and disabled adults (11 high-rises) and families (2 communities). Units are under Section 9 Annual Contributions Contracts (ACC).

These communities are candidates for demolition, disposition, subsidy reformulation, and/or other repositioning activities.

#	Community	Type of Assistance	
		PH	PBRA
1	Barge Road Highrise	X	
2	Cheshire Bridge Road Highrise	X	
3	Cosby Spear Highrise	X	
4	East Lake Highrise ⁽¹⁾	X	
5	Georgia Avenue Highrise	X	
6	Hightower Manor Highrise	X	
7	Juniper and Tenth Highrise ⁽²⁾	X	X
8	Marian Road Highrise	X	
9	Marietta Road Highrise	X	
10	Peachtree Road Highrise	X	
11	Piedmont Road Highrise	X	
12	Martin Street Plaza	X	
13	Westminster	X	

⁽¹⁾ All communities are located in Fulton County, except East Lake Highrise which is located in DeKalb County.

⁽²⁾ Under the Rental Assistance Demonstration (RAD) Program, the operating subsidy for all public housing units are being converted to AHA's Project Based Rental Assistance (PBRA).

6. AHA-Owned, Managed, and Sponsored Communities and Properties (as of March 17, 2016)

AHA Sponsored Mixed-Income, Mixed-Finance Communities

AHA's Strategic Revitalization Program facilitates, by private real estate developers, the creation of market-rate quality mixed-use, mixed-income communities associated with the sites of former public housing projects. Portions of the sites have been disposed of to new owner entities to facilitate the development of the rental phases below. Development of the rental phases is funded through conventional debt, HUD funds, and Low Income Housing Tax Credits (LIHTC).

#	Community	Former Public Housing Community	Type of Assistance	
			PH	PBRA
1	Ashley Auburn Pointe I	Grady Homes	X	X
2	Ashley Auburn Pointe II	Grady Homes	X	X
3	Ashley CollegeTown I	Harris Homes	X	
4	Ashley CollegeTown II	Harris Homes	X	X
5	Ashley Courts at Cascade I	Kimberly Courts	X	X
6	Ashley Courts at Cascade II	Kimberly Courts	X	X
7	Ashley Courts at Cascade III	Kimberly Courts	X	X
8	Ashley Terrace at West End	Kimberly Courts	X	
9	Atrium at CollegeTown	Harris Homes	X	X
10	Capitol Gateway I	Capitol Homes	X	X
11	Capitol Gateway II	Capitol Homes	X	X
12	Centennial Place I	Techwood/Clark Howell Homes		X
13	Centennial Place II	Techwood/Clark Howell Homes		X
14	Centennial Place III	Techwood/Clark Howell Homes		X
15	Centennial Place IV	Techwood/Clark Howell Homes		X
16	Columbia Commons	East Lake	X	X
17	Columbia Creste at West Highlands	Perry Homes	X	
18	Columbia Estates at West Highlands	Perry Homes	X	
19	Columbia Grove at West Highlands	Perry Homes	X	
20	Columbia Heritage	Perry Homes		X
21	Columbia High Point Senior	Carver Homes		X
22	Columbia Mechanicsville (Family) Apartments	McDaniel Glenn	X	X
23	Columbia Park Citi at West Highlands	Perry Homes	X	
24	Columbia Senior Residences at Mechanicsville	McDaniel Glenn	X	X

6. AHA-Owned, Managed, and Sponsored Communities and Properties (as of March 17, 2016)

AHA Sponsored Mixed-Income, Mixed-Finance Communities

#	Community	Former Public Housing Community	Type of Assistance	
			PH	PBRA
25	Columbia Senior Residences at MLK	Capitol Homes		X
26	Columbia Tower at MLK Village	Capitol Homes		X
27	Columbia Village ⁽¹⁾	East Lake	X	
28	Gardens at CollegeTown	Harris Homes	X	
29	Magnolia Park I	John Eagan Homes	X	
30	Magnolia Park II	John Eagan Homes	X	
31	Mechanicsville Crossing	McDaniel Glenn	X	X
32	Mechanicsville Station	McDaniel Glenn	X	X
33	Oasis at Scholars Landing	University Homes		X
34	Parkside at Mechanicsville	McDaniel Glenn	X	X
35	Veranda at Auburn Pointe	Grady Homes	X	X
36	Veranda at Auburn Pointe II	Grady Homes		X
37	Veranda at Auburn Pointe III	Grady Homes		X
38	Veranda at Carver	Carver Homes		X
39	Veranda at CollegeTown	Harris Homes		X
40	Veranda at Scholars Landing	University Homes		X
41	Village at Castleberry Hill I	John Hope Homes	X	
42	Village at Castleberry Hill II	John Hope Homes	X	
43	Villages at Carver I	Carver Homes	X	
44	Villages at Carver II	Carver Homes	X	
45	Villages at Carver III	Carver Homes	X	
46	Villages at Carver V	Carver Homes	X	
47	Villages of East Lake I ⁽¹⁾	East Lake	X	
48	Villages of East Lake II ⁽¹⁾	East Lake	X	

⁽¹⁾ All communities are located in Fulton County, except Columbia Village and Villages of East Lake I and II, which are located in DeKalb County.

Note: The former public housing communities Grady Homes, Carver Homes, Capitol Homes, Harris Homes, McDaniel Glenn, Perry Homes, University Homes, and Techwood/Clark Howell Homes are all in an active redevelopment process, which includes one or more of the following phases: master planning, resident relocation, demolition, disposition, construction, lease-up, and/or subsidy reformulation.

6. AHA-Owned, Managed, and Sponsored Communities and Properties (as of March 17, 2016)

Project Based Rental Assistance (PBRA) Communities

Using the flexibility under its MTW Agreement, AHA has designed its own Project Based Rental Assistance (PBRA) program. The program leverages and/or incents development by local Atlanta private real estate developers and Owner Entities to create additional mixed-income developments and supportive housing opportunities. AHA contracts with them for up to 15 years to provide rental assistance that guarantees the availability of affordable units to low-income families for the life of the agreement. Development funding may consist of conventional debt, HUD funds, and Low Income Housing Tax Credits (LIHTC).

#	Community	Type of Assistance	
		PH	PBRA
1	Adamsville Green		X
2	Arcadia at Parkway Village		X
3	Ashton Browns Mill		X
4	Auburn Glenn		X
5	Avalon Park Family		X
6	Avalon Park Senior		X
7	Avalon Ridge		X
8	Campbell Stone		X
9	Columbia at Sylvan Hills		X
10	Columbia Colony Senior		X
11	Columbia Senior Residences at Blackshear		X
12	Columbia Senior Residences at Edgewood ⁽¹⁾		X
13	Columbia South River Gardens		X
14	Commons at Imperial Hotel		X
15	Constitution Avenue Apartments		X
16	Crogman School Apartments		X
17	First Step		X
18	Gateway at East Point		X
19	GE Towers		X

6. AHA-Owned, Managed, and Sponsored Communities and Properties (as of March 17, 2016)

Project Based Rental Assistance (PBRA) Communities

#	Community	Type of Assistance	
		PH	PBRA
20	Heritage Green		X
21	Heritage Station I		X
22	Heritage Station II		X
23	Highbury Terraces		X
24	Legacy at Walton Lakes		X
25	Lillie R. Campbell House		X
26	Manor at Scott's Crossing		X
27	Martin House at Adamsville Place		X
28	Odyssey Villas		X
29	O'Hern House		X
30	Park Commons HFOP		X
31	Park Commons HFS		X
32	Pavilion Place		X
33	Peaks at MLK		X
34	Quest Village III		X
35	Renaissance at Park Place South		X
36	Retreat at Edgewood ⁽¹⁾		X
37	Seven Courts		X
38	Summit Trail ⁽¹⁾		X
39	Villas of H.O.P.E.		X
40	Welcome House		X
41	Woodbridge at Parkway Village		X

⁽¹⁾ All communities are located in Fulton County, except Columbia Senior Residences at Edgewood, Retreat at Edgewood and Summit Trail, which are located in DeKalb County.

6. AHA-Owned, Managed, and Sponsored Communities and Properties (as of March 17, 2016)

Former Public Housing Communities

These former public housing communities are all vacant and demolished. These properties are all candidates for partial or full disposition and/or other repositioning activities.

#	Former Public Housing Community	HUD Project Number
1	Palmer House Highrise	GA006000140
2	Bankhead Courts	GA006000280
3	Bowen Homes	GA006000120
4	Herndon Homes	GA006000592
5	Hollywood Courts	GA006000200
6	Thomasville Heights	GA006000170
7	Englewood Manor	GA0060230
8	Jonesboro North	GA0060320
9	Jonesboro South	GA0060310
10	U-Rescue Villa	GA0060240
11	Leila Valley	GA006029

6. AHA-Owned, Managed, and Sponsored Communities and Properties (as of March 17, 2016)

Facilities and Land Owned or Acquired by AHA

Parcel ID	Address	City	State	Zip Code
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These properties are all candidates for demolition and/or disposition or will be used to expand AHA's real estate portfolio, provide affordable and/or mixed-income, mixed-use housing opportunities, and support local revitalization initiatives to stabilize local neighborhoods.

NOTE: For the listing and description of any planned Land Swaps transactions or other actions, refer to the HUD-approved Revitalization Plan and Section II. 2017 Priorities

14-0117-0003-055-2	0 Abbott St	Atlanta	GA	30310
14-0117-0003-017-2	320 Abbott St	Atlanta	GA	30310
15-180-02-025	0 Alston Dr SE	Atlanta	GA	30317
14-0072-0006-094-1	257 Amal Dr	Atlanta	GA	30315
17-0225-LL-103-6	1525 Argule Lane NW	Atlanta	GA	30318
14-0072-0002-032-5	0 Arthur J. Langford Rd	Atlanta	GA	30315
14-0116-0003-078-5	0 Ashby St	Atlanta	GA	30314
14-0046-0010-140-9	0 Auburn Ave NE	Atlanta	GA	30303
14-0046-0010-141-7	333 Auburn Ave NE	Atlanta	GA	30303
14-0046-0010-197-9	333 Auburn Ave NE	Atlanta	GA	30303
14-0117-0002-037-1	0 Baldwin St SW	Atlanta	GA	30310
14-0117-0002-038-9	0 Baldwin St SW	Atlanta	GA	30310
14-0117-0002-039-7	0 Baldwin St SW	Atlanta	GA	30310
14-0117-0002-040-5	1047 Baldwin St SW	Atlanta	GA	30310
14-0117-0002-095-9	1059 Baldwin St SW	Atlanta	GA	30310
17-0267-LL-075-5	3475 Bankhead Hwy NW	Atlanta	GA	30331
17-0267-LL-083-9	3476 Bankhead Hwy NW	Atlanta	GA	30331
14-0252-LL-064-3	2440 Barge Rd SW	Atlanta	GA	30331
14-0047-0001-093-0	0 Bedford Pl NE	Atlanta	GA	30303
14-0110-0004-034-3	875 Booker Washington Dr	Atlanta	GA	30314
14-0110-0007-007-6	880 Booker Washington Dr	Atlanta	GA	30314
14-0110-0004-036-8	883 Booker Washington Dr	Atlanta	GA	30314
14-0110-0007-006-8	886 Booker Washington Dr	Atlanta	GA	30314
14-0110-0007-004-3	890 Booker Washington Dr	Atlanta	GA	30314
14-0042-0004-080-9	951 Boulevard SE	Atlanta	GA	30312
14-0051-0009-159-4	0 Butler St	Atlanta	GA	30303
14-0051-0009-160-2	0 Butler St	Atlanta	GA	30303
14-0110-0009-017-3	757 Carter St	Atlanta	GA	30314
14-0110-0009-019-9	765 Carter St	Atlanta	GA	30314
14-0110-0009-018-1	767 Carter St	Atlanta	GA	30314
14-0079-0006-003-5	0 Centennial Olympic Park Dr NW	Atlanta	GA	30313
14-0079-0011-059-0	0 Centennial Olympic Park Dr NW	Atlanta	GA	30313
17-0005-LL-085-1	0 Cheshire Bridge Rd	Atlanta	GA	30324
17-0005-LL-086-9	2170 Cheshire Bridge Rd	Atlanta	GA	30324
17-0227-LL-018-4	0 Clarissa Dr NW	Atlanta	GA	30318
14-0041-0002-035-6	0 Climax St SE	Atlanta	GA	30315
14-0041-0002-052-1	373 Climax St SE	Atlanta	GA	30315
14-0041-0002-029-9	374 Climax St SE	Atlanta	GA	30315
14-0041-0002-051-3	379 Climax St SE	Atlanta	GA	30315
14-0041-0002-030-7	380 Climax St SE	Atlanta	GA	30315
14-0041-0002-050-5	385 Climax St SE	Atlanta	GA	30315
14-0041-0002-031-5	388 Climax St SE	Atlanta	GA	30315

6. AHA-Owned, Managed, and Sponsored Communities and Properties (as of March 17, 2016)

Facilities and Land Owned or Acquired by AHA

Parcel ID	Address	City	State	Zip Code
14-0041-0002-049-7	393 Climax St SE	Atlanta	GA	30315
14-0041-0002-032-3	394 Climax St SE	Atlanta	GA	30315
14-0041-0002-033-1	400 Climax St SE	Atlanta	GA	30315
14-0041-0002-034-9	406 Climax St SE	Atlanta	GA	30315
14-0041-0002-048-9	407 Climax St SE	Atlanta	GA	30315
14-0041-0002-047-1	411 Climax St SE	Atlanta	GA	30315
14-0041-0002-036-4	412 Climax St SE	Atlanta	GA	30315
14-0041-0002-046-3	417 Climax St SE	Atlanta	GA	30315
14-0041-0002-037-2	418 Climax St SE	Atlanta	GA	30315
14-0041-0002-038-0	424 Climax St SE	Atlanta	GA	30315
14-0041-0002-045-5	425 Climax St SE	Atlanta	GA	30315
14-0041-0002-039-8	430 Climax St SE	Atlanta	GA	30315
14-0041-0002-044-8	431 Climax St SE	Atlanta	GA	30315
14-0041-0002-040-6	436 Climax St SE	Atlanta	GA	30315
14-0041-0002-043-0	437 Climax St SE	Atlanta	GA	30315
14-0041-0002-041-4	442 Climax St SE	Atlanta	GA	30315
14-0041-0002-042-2	443 Climax St SE	Atlanta	GA	30315
17-0225-LL-052-5	1532 Craftsman Rd NW	Atlanta	GA	30318
14-0085-0013-115-0	330 Crumley St SW	Atlanta	GA	30312
14-0085-0013-088-9	376 Crumley St SW	Atlanta	GA	30312
14-0085-0013-085-5	390 Crumley St SW	Atlanta	GA	30312
14-0085-0013-084-8	394 Crumley St SW	Atlanta	GA	30312
14-0117-0003-061-0	940 Cunningham Pl	Atlanta	GA	30310
14-0081-0001-110-9	0 Curran St NW	Atlanta	GA	30318
14-0081-0004-107-2	0 Curran St NW	Atlanta	GA	30318
14-0041-0002-057-0	0 Dalton St SE	Atlanta	GA	30315
14-0041-0002-053-9	374 Dalton St SE	Atlanta	GA	30315
14-0041-0002-060-4	375 Dalton St SE	Atlanta	GA	30315
14-0041-0002-054-7	380 Dalton St SE	Atlanta	GA	30315
14-0041-0002-059-6	381 Dalton St SE	Atlanta	GA	30315
14-0041-0002-055-4	386 Dalton St SE	Atlanta	GA	30315
14-0041-0002-058-8	387 Dalton St SE	Atlanta	GA	30315
14-0041-0002-056-2	394 Dalton St SE	Atlanta	GA	30315
14-0045-0006-037-4	380 Decatur St SE	Atlanta	GA	30312
14-0075-0008-075-5	0 Doane St	Atlanta	GA	30312
17-0227-LL-003-6	590 Dobbs Circle	Atlanta	GA	30318
17-0224-0003-216-3	0 Drew Drive	Atlanta	GA	30318
17-0227-LL-075-4	0 Drew Place	Atlanta	GA	30318
15-180-03-023	380 East Lake Blvd SE	Atlanta	GA	30317
15-180-02-016	421 East Lake Blvd SE	Atlanta	GA	30317
15-180-03-025	457 East Lake Blvd SE	Atlanta	GA	30317
15-180-03-020	460 East Lake Blvd SE	Atlanta	GA	30317
14-0109-0005-076-6	178 Elm St SW	Atlanta	GA	30314
14-0109-0005-075-8	180 Elm St SW	Atlanta	GA	30314
14-0041-LL-011-0	0 Englewood Ave SE	Atlanta	GA	30315
14-0041-LL-013-6	0 Englewood Ave SE	Atlanta	GA	30315
14-0041-LL-010-2	505 Englewood Ave SE	Atlanta	GA	30315

6. AHA-Owned, Managed, and Sponsored Communities and Properties (as of March 17, 2016)

Facilities and Land Owned or Acquired by AHA

Parcel ID	Address	City	State	Zip Code
14-0041-LL-012-8	505 Englewood Ave SE	Atlanta	GA	30315
14-0109-0005-083-2	0 Fair St SW	Atlanta	GA	30314
14-0084-0005-041-9	605-607 Fair St SW	Atlanta	GA	30314
14-0084-0005-043-5	615 Fair St SW	Atlanta	GA	30314
14-0109-0005-062-6	653 Fair St SW	Atlanta	GA	30314
14-0109-0005-073-3	655 Fair St SW	Atlanta	GA	30314
14-0109-LL-013-5	668 Fair St SW	Atlanta	GA	30314
14-0109-LL-033-3	668 Fair St SW	Atlanta	GA	30314
14-0055-0004-166-0	0 Fern Ave	Atlanta	GA	30315
14-0081-0004-104-9	0 Fifth St	Atlanta	GA	30305
14-0081-0004-105-6	0 Fifth St	Atlanta	GA	30305
14-0075-0001-078-6	0 Formwalt St SW	Atlanta	GA	30312
14-0075-0001-156-0	629 Formwalt St SW	Atlanta	GA	30312
14-0116-0010-082-8	0 Frank St	Atlanta	GA	30314
14-0116-0010-083-6	0 Frank St	Atlanta	GA	30314
14-0116-0010-084-4	928 Frank St	Atlanta	GA	30314
14-0116-0010-058-8	931 Frank St	Atlanta	GA	30314
14-0116-0010-059-6	937 Frank St	Atlanta	GA	30314
14-0116-0010-081-0	940 Frank St	Atlanta	GA	30314
14-0116-0010-060-4	941 Frank St	Atlanta	GA	30314
14-0116-0010-080-2	944 Frank St	Atlanta	GA	30314
14-0116-0010-061-2	945 Frank St	Atlanta	GA	30314
14-0116-0010-079-4	948 Frank St	Atlanta	GA	30314
14-0116-0010-078-6	952 Frank St	Atlanta	GA	30314
14-0116-0010-077-8	954 Frank St	Atlanta	GA	30314
14-0116-0010-076-0	960 Frank St	Atlanta	GA	30314
14-0116-0010-075-2	964 Frank St	Atlanta	GA	30314
14-0116-0010-074-5	968 Frank St	Atlanta	GA	30314
14-0116-0010-109-9	980 Frank St	Atlanta	GA	30314
14-0085-LL-019-0	0 Fulton St	Atlanta	GA	30312
14-0085-LL-020-8	0 Fulton St	Atlanta	GA	30312
14-0085-LL-021-6	0 Fulton St	Atlanta	GA	30312
14-0045-0002-090-7	0 Gartrell St SE	Atlanta	GA	30312
14-0054-0003-075-5	0 Georgia Ave	Atlanta	GA	30312
14-0054-0002-082-2	142 Georgia Ave	Atlanta	GA	30312
14-0054-0002-083-0	174 Georgia Ave	Atlanta	GA	30312
14-0085-0013-101-0	0 Glenn St SW	Atlanta	GA	30312
14-0075-0001-159-4	254 Glenn St SW	Atlanta	GA	30312
14-0085-0013-102-8	1186 Glenn St SW	Atlanta	GA	30312
15-180-03-019	0 Glenwood Ave	Atlanta	GA	30317
14-0026-0001-073-7	0 Grange Dr	Atlanta	GA	30315
14-0026-0001-067-9	863 Grange Court	Atlanta	GA	30315
14-0054-0009-089-0	865 Grant Terrace	Atlanta	GA	30315
14-0082-0006-002-2	467 Gray St NW	Atlanta	GA	30318
14-0108-LL-025-0	565 Greensferry Road	Atlanta	GA	30314
14-0108-LL-023-5	600 Greensferry Road	Atlanta	GA	30314
14-0085-0009-083-6	19 Gregg St SW	Atlanta	GA	30312

6. AHA-Owned, Managed, and Sponsored Communities and Properties (as of March 17, 2016)

Facilities and Land Owned or Acquired by AHA

Parcel ID	Address	City	State	Zip Code
17-0225-LL-015-2	0 Grove Park Pl NW	Atlanta	GA	30318
17-0225-LL-034-6	0 Grove Park Pl NW	Atlanta	GA	30318
17-0226-LL-019-3	0 Habershal Dr NW	Atlanta	GA	30318
17-0224-0003-214-8	1575 Habershal Dr NW	Atlanta	GA	30318
14-0007-0013-019-9	1150 Henry Thomas Dr	Atlanta	GA	30315
14-0055-0006-065-2	0 Hill St SE	Atlanta	GA	30312
14-0045-LL-480-3	0 Hilliard St SE	Atlanta	GA	30312
14-0045-LL-481-1	0 Hilliard St SE	Atlanta	GA	30312
14-0045-LL-482-9	0 Hilliard St SE	Atlanta	GA	30312
14-0046-0010-204-3	15 Hilliard St SE	Atlanta	GA	30312
14-0045-0001-058-5	20 Hilliard St SE	Atlanta	GA	30312
14-0045-0001-059-3	20 Hilliard St SE	Atlanta	GA	30312
14-0045-LL-474-6	109 Hilliard St SE	Atlanta	GA	30312
14-0045-0001-057-7	110 Hilliard St SE	Atlanta	GA	30312
14-0045-LL-475-3	115 Hilliard St SE	Atlanta	GA	30312
14-0045-0006-036-6	126 Hilliard St SE	Atlanta	GA	30312
17-0251-LL-007-6	1580 Hollywood Rd NW	Atlanta	GA	30318
14-0085-LL-007-5	0 Humphries St	Atlanta	GA	30312
14-0085-LL-013-3	568 Humphries St	Atlanta	GA	30312
14-0079-0006-018-3	0 Hunnicutt St NW	Atlanta	GA	30313
14-0079-0006-019-1	0 Hunnicutt St NW	Atlanta	GA	30313
14-0079-0006-020-9	0 Hunnicutt St NW	Atlanta	GA	30313
14-0079-0006-021-7	0 Hunnicutt St NW	Atlanta	GA	30313
14-0079-0006-022-5	0 Hunnicutt St NW	Atlanta	GA	30313
14-0079-0006-023-3	0 Hunnicutt St NW	Atlanta	GA	30313
14-0085-0013-095-4	0 Ira St SW	Atlanta	GA	30312
14-0085-0013-096-2	0 Ira St SW	Atlanta	GA	30312
14-0085-0013-100-2	0 Ira St SW	Atlanta	GA	30312
14-0085-0013-092-1	579 Ira St SW	Atlanta	GA	30312
14-0085-0013-094-7	587 Ira St SW	Atlanta	GA	30312
14-0085-0013-097-0	595 Ira St SW	Atlanta	GA	30312
14-0085-0013-098-8	599 Ira St SW	Atlanta	GA	30312
14-0085-0013-099-6	603 Ira St SW	Atlanta	GA	30312
17-0259-LL-163-9	0 James Jackson Pkwy NW	Atlanta	GA	30318
14-0110-0009-021-5	81 James P. Brawley Dr NW	Atlanta	GA	30314
14-0110-0009-022-3	87 James P. Brawley Dr NW	Atlanta	GA	30314
14-0110-0009-023-1	91 James P. Brawley Dr NW	Atlanta	GA	30314
14-0110-0009-025-6	99 James P. Brawley Dr NW	Atlanta	GA	30314
14-0110-0009-024-9	93 - 95 James P. Brawley Dr NW	Atlanta	GA	30314
14-0110-0009-158-5	103-111 James P. Brawley Dr NW	Atlanta	GA	30314
14-0082-0006-008-9	0 John St	Atlanta	GA	30314
14-0082-0006-009-7	0 John St	Atlanta	GA	30314
14-0082-0006-011-3	0 John St	Atlanta	GA	30314
14-0051-0009-151-1	230 John Wesley Dobbs Ave	Atlanta	GA	30303
17-0225-LL-038-4	0 Johnson Rd NW	Atlanta	GA	30318
17-0225-LL-040-0	0 Johnson Rd NW	Atlanta	GA	30318
17-0225-LL-025-1	1125 Johnson Rd NW	Atlanta	GA	30318

6. AHA-Owned, Managed, and Sponsored Communities and Properties (as of March 17, 2016)

Facilities and Land Owned or Acquired by AHA

Parcel ID	Address	City	State	Zip Code
17-0225-LL-012-9	1175 Johnson Road NW	Atlanta	GA	30318
14-0027-LL-134-8	2291 Jonesboro Rd	Atlanta	GA	30315
14-0028-LL-061-2	2471 Jonesboro Rd	Atlanta	GA	30315
14-0116-0010-085-1	0 Joseph E. Lowery Blvd SW	Atlanta	GA	30310
14-0117-0003-013-1	0 Joseph E. Lowery Blvd SW	Atlanta	GA	30310
14-0110-0007-015-9	135 Joseph E. Lowery Blvd SW	Atlanta	GA	30310
14-0116-0010-086-9	285 Joseph E. Lowery Blvd SW	Atlanta	GA	30310
14-0116-0010-119-8	295 Joseph E. Lowery Blvd SW	Atlanta	GA	30310
14-0117-0003-054-5	325 Joseph E. Lowery Blvd SW	Atlanta	GA	30310
14-0117-0003-057-8	435 Joseph E. Lowery Blvd SW	Atlanta	GA	30310
14F-0029-LL-039-1	0 Kimberly Rd	Atlanta	GA	30331
14F-0029-LL-040-9	0 Kimberly Rd	Atlanta	GA	30331
14F-0029-LL-038-3	1371 Kimberly Rd	Atlanta	GA	30331
14F-0029-LL-041-7	1371 Kimberly Rd	Atlanta	GA	30331
14F-0029-LL-029-2	1381 Kimberly Rd	Atlanta	GA	30331
15-180-01-006	0 Lakeside Village Dr	Atlanta	GA	30317
14-0117-LL-001-0	406 Lawton St	Atlanta	GA	30310
14-0108-0007-049-2	0 Lee St SW	Atlanta	GA	30310
14-0005-0002-066-5	2413 Leila Lane	Atlanta	GA	30315
14-0047-0004-099-4	0 Linden Ave	Atlanta	GA	30308
14-0006-LL-065-9	2405 Locust Lane SE	Atlanta	GA	30315
17-0190-LL-040-1	0 Lois St NW	Atlanta	GA	30318
14-0117-0006-094-8	0 Lucile Ave	Atlanta	GA	30310
14-0117-0006-103-7	0 Lucile Ave	Atlanta	GA	30310
14-0079-0006-017-5	0 Luckie St NW	Atlanta	GA	30313
14-0079-0001-021-2	523 Luckie St NW	Atlanta	GA	30313
14-0110-0007-058-9	0 Magnolia St NW	Atlanta	GA	30314
14-0110-0009-003-3	760 Magnolia St	Atlanta	GA	30314
14-0110-0009-002-5	768 Magnolia St	Atlanta	GA	30314
14-0110-0007-056-3	892 Magnolia St	Atlanta	GA	30314
17-0048-LL-035-5	760 Marian Rd	Atlanta	GA	30324
17-0244-0001-029-8	2295 Marietta Rd NW	Atlanta	GA	30318
14-0053-0002-003-9	0 Martin St	Atlanta	GA	30312
14-0053-0002-067-4	0 Martin St	Atlanta	GA	30312
14-0053-0001-101-2	371 Martin St	Atlanta	GA	30312
14-0205-0001-076-3	2610 Martin Luther King Jr Dr SW	Atlanta	GA	30311
14-0085-LL-006-7	0 McDaniel St	Atlanta	GA	30312
14-0085-LL-028-1	0 McDaniel St	Atlanta	GA	30310
14-0085-LL-029-9	0 McDaniel St	Atlanta	GA	30310
14-0085-LL-030-7	0 McDaniel St	Atlanta	GA	30310
14-0085-LL-031-5	0 McDaniel St	Atlanta	GA	30310
14-0108-LL-002-9	365 McDaniel St	Atlanta	GA	30313
14-0086-0002-081-6	749 McDaniel St	Atlanta	GA	30310
14-0008-LL-016-0	0 McDonough Blvd	Atlanta	GA	30315
14-0008-LL-022-8	0 McDonough Blvd	Atlanta	GA	30315
14-0072-LL-043-5	0 Meldon Ave	Atlanta	GA	30315
15-180-02-018	0 Memorial Dr SE	Atlanta	GA	30317

6. AHA-Owned, Managed, and Sponsored Communities and Properties (as of March 17, 2016)

Facilities and Land Owned or Acquired by AHA

Parcel ID	Address	City	State	Zip Code
14-0044-0001-109-7	0 Memorial Dr SE	Atlanta	GA	30312
14-0052-0008-040-6	0 Memorial Dr SE	Atlanta	GA	30312
14-0053-0002-066-6	0 Memorial Dr SE	Atlanta	GA	30312
14-0052-0008-034-9	22 Memorial Dr SE	Atlanta	GA	30312
14-0053-0002-001-3	175 Memorial Dr SE	Atlanta	GA	30312
14-0044-0001-016-4	341 Memorial Dr SE	Atlanta	GA	30312
14-0044-0001-108-9	359 Memorial Dr SE	Atlanta	GA	30312
14-0044-0001-101-4	361 Memorial Dr SE	Atlanta	GA	30312
14-0044-0001-099-0	363 Memorial Dr SE	Atlanta	GA	30312
14-0044-0001-022-2	381 Memorial Dr SE	Atlanta	GA	30312
15-180-01-005	2143 Memorial Dr SE	Atlanta	GA	30317
14-0079-0002-024-5	0 Merritts Ave	Atlanta	GA	30313
14-0008-LL-015-2	1773 Moreland Ave	Atlanta	GA	30315
14-0072-LL-044-3	0 Moury Ave SE	Atlanta	GA	30315
14-0072-LL-045-0	0 Moury Ave SE	Atlanta	GA	30315
14-0072-LL-046-8	0 Moury Ave SE	Atlanta	GA	30315
14-0072-LL-047-6	0 Moury Ave SE	Atlanta	GA	30315
14-0072-LL-048-4	0 Moury Ave SE	Atlanta	GA	30315
14-0072-LL-049-2	0 Moury Ave SE	Atlanta	GA	30315
14-0072-LL-050-0	0 Moury Ave SE	Atlanta	GA	30315
14-0072-LL-051-8	0 Moury Ave SE	Atlanta	GA	30315
14-0072-LL-023-7	174 Moury St	Atlanta	GA	30315
14-0072-0006-089-1	0 New South Pryor Rd	Atlanta	GA	30315
14-0072-0006-095-8	1765 New South Pryor Rd	Atlanta	GA	30315
14-0047-0001-001-3	301 North Ave NE	Atlanta	GA	30354
14-0047-0001-092-2	311 North Ave NE	Atlanta	GA	30354
14-0047-LL-001-5	361 North Ave NE	Atlanta	GA	30308
14-0081-0001-112-5	0 Northside Dr	Atlanta	GA	30318
17-0149-0008-125-3	0 Northside Dr	Atlanta	GA	30318
14-0044-0001-024-8	0 Oakland Ave SE	Atlanta	GA	30312
14-0044-0001-023-0	303 Oakland Ave SE	Atlanta	GA	30312
14-0108-0003-050-4	899 Park St SW	Atlanta	GA	30310
14-0109-LL-032-5	700 Parsons Street	Atlanta	GA	30314
14-0110-LL-001-7	60 Paschal Blvd	Atlanta	GA	30314
14-0110-LL-003-3	60 Paschal Blvd	Atlanta	GA	30314
17-0111-0005-066-6	2240 Peachtree Rd NW	Atlanta	GA	30309
17-0227-LL-073-9	0 Perry Blvd NW	Atlanta	GA	30318
17-0227-LL-077-0	0 Perry Blvd NW	Atlanta	GA	30318
17-0227-LL-011-9	1800 Perry Blvd NW	Atlanta	GA	30318
17-0227-LL-026-7	1810 Perry Blvd NW	Atlanta	GA	30318
17-0228-LL-022-5	2000 Perry Blvd NW	Atlanta	GA	30318
17-0055-0002-018-8	1422 Piedmont Ave NE	Atlanta	GA	30309
17-0098-LL-062-8	3603 Piedmont Rd NE	Atlanta	GA	30305
14-0079-0002-010-4	0 Pine St NW	Atlanta	GA	30313
14-0079-0002-011-2	0 Pine St NW	Atlanta	GA	30313
14-0079-0002-012-0	0 Pine St NW	Atlanta	GA	30313
14-0079-0002-013-8	0 Pine St NW	Atlanta	GA	30313

6. AHA-Owned, Managed, and Sponsored Communities and Properties (as of March 17, 2016)

Facilities and Land Owned or Acquired by AHA

Parcel ID	Address	City	State	Zip Code
14-0079-0002-014-6	0 Pine St NW	Atlanta	GA	30313
14F-0026-LL-028-7	658 Plainville Drive SW	Atlanta	GA	30331
14-0072-0002-031-7	0 Pryor Rd SW	Atlanta	GA	30315
14-0072-LL-057-8	0 Pryor Rd SW	Atlanta	GA	30315
14-0072-LL-033-6	0 Pryor St SE	Atlanta	GA	30315
14-0072-LL-034-4	0 Pryor St SE	Atlanta	GA	30315
14-0072-LL-035-1	0 Pryor St SE	Atlanta	GA	30315
14-0072-LL-036-9	0 Pryor St SE	Atlanta	GA	30315
14-0072-LL-038-5	0 Pryor St SE	Atlanta	GA	30315
14-0072-LL-040-1	0 Pryor St SE	Atlanta	GA	30315
14-0072-LL-041-9	0 Pryor St SE	Atlanta	GA	30315
14-0072-LL-042-7	0 Pryor St SE	Atlanta	GA	30315
14-0072-LL-058-3	0 Pryor St SE	Atlanta	GA	30315
14-0072-0002-023-4	1531 Pryor Rd SW	Atlanta	GA	30315
14-0072-0002-007-7	1569 Pryor Rd SW	Atlanta	GA	30315
14-0072-0002-008-5	1599 Pryor Rd SW	Atlanta	GA	30315
14-0072-0002-012-7	1623 Pryor Rd SW	Atlanta	GA	30315
14-0075-0001-160-2	0 Ralph D. Abernathy Blvd SW	Atlanta	GA	30312
14-0053-0001-107-9	0 Rawson St	Atlanta	GA	30312
14-0053-LL-006-5	101 Rawson St	Atlanta	GA	30312
14-0085-0013-083-0	0 Ray Alley SW	Atlanta	GA	30312
14-0085-0013-113-5	0 Ray Alley SW	Atlanta	GA	30312
14-0076-0007-118-3	250 Richardson St	Atlanta	GA	30312
17-0190-LL-035-1	0 Rockdale St NW	Atlanta	GA	30318
14-0033-0001-054-8	3698 Ruby H Harper Blvd	Atlanta	GA	30354
14-0072-0002-010-1	1543-1549 S Pryor Rd	Atlanta	GA	30315
14-0072-0002-033-3	1543-1549 S Pryor Rd	Atlanta	GA	30315
14-0117-0003-019-8	0 Sells Ave SW	Atlanta	GA	30310
14-0117-0003-067-7	0 Sells Ave SW	Atlanta	GA	30310
14-0117-0003-068-5	0 Sells Ave SW	Atlanta	GA	30310
14-0117-0003-069-3	0 Sells Ave SW	Atlanta	GA	30310
14-0110-0005-089-6	791 Spencer St NW	Atlanta	GA	30314
14-0110-0005-021-9	797 Spencer St NW	Atlanta	GA	30314
14-0110-0005-022-7	801 Spencer St NW	Atlanta	GA	30314
14-0110-0004-059-0	835 Spencer St NW	Atlanta	GA	30314
14-0110-0004-060-8	843 Spencer St NW	Atlanta	GA	30314
14-0110-0004-048-3	847 Spencer St NW	Atlanta	GA	30314
14-0110-0004-056-6	855 Spencer St NW	Atlanta	GA	30314
14-0110-0004-057-4	859 Spencer St NW	Atlanta	GA	30314
14-0110-0004-015-2	883 Spencer St NW	Atlanta	GA	30314
14-0110-0004-016-0	887 Spencer St NW	Atlanta	GA	30314
14-0110-0004-018-6	895 Spencer St NW	Atlanta	GA	30314
14-0079-0003-075-6	0 Techwood Dr	Atlanta	GA	30313
17-0106-0009-118-8	150 Tenth St NE	Atlanta	GA	30309
14-0026-0005-026-1	0 Thomasville Blvd	Atlanta	GA	30315
14-0026-0005-027-9	0 Thomasville Blvd	Atlanta	GA	30315
14-0026-LL-051-5	0 Thomasville Blvd	Atlanta	GA	30315

6. AHA-Owned, Managed, and Sponsored Communities and Properties (as of March 17, 2016)

Facilities and Land Owned or Acquired by AHA

Parcel ID	Address	City	State	Zip Code
14-0110-0005-006-0	804 Thurmond St NW	Atlanta	GA	30314
14-0110-0004-053-3	834 Thurmond St NW	Atlanta	GA	30314
14-0110-0004-054-1	838 Thurmond St NW	Atlanta	GA	30314
14-0110-0004-064-0	842 Thurmond St NW	Atlanta	GA	30314
14-0110-0004-061-6	846 Thurmond St NW	Atlanta	GA	30314
14-0110-0004-062-4	850 Thurmond St NW	Atlanta	GA	30314
14-0007-0005-025-6	0 Velma St	Atlanta	GA	30315
14-0084-0005-090-6	136 Vine St	Atlanta	GA	30314
14-0084-0005-091-4	138 Vine St	Atlanta	GA	30314
14-0084-0005-051-8	140 Vine St	Atlanta	GA	30314
14-0084-0005-050-0	146 Vine St	Atlanta	GA	30314
14-0084-0005-049-2	152 Vine St	Atlanta	GA	30314
14-0084-0005-048-4	158 Vine St	Atlanta	GA	30314
14-0084-0005-095-5	162 Vine St	Atlanta	GA	30314
14-0084-0005-096-3	162 Vine St	Atlanta	GA	30314
14-0084-0005-046-8	168 Vine St	Atlanta	GA	30314
14-0084-0005-044-3	172 Vine St	Atlanta	GA	30314
14-0084-0005-034-4	175 Walnut St	Atlanta	GA	30314
14-0117-0005-061-8	0 West End Pl SW	Atlanta	GA	30310
14-0116-0010-027-3	0 Westview Dr SW	Atlanta	GA	30310
14-0116-0010-093-5	0 Westview Dr SW	Atlanta	GA	30310
14-0116-0010-096-8	0 Westview Dr SW	Atlanta	GA	30310
14-0116-0010-099-2	0 Westview Dr SW	Atlanta	GA	30310
14-0116-0010-114-9	0 Westview Dr SW	Atlanta	GA	30310
14-0117-0002-003-3	0 Westview Dr SW	Atlanta	GA	30310
14-0117-0002-007-4	0 Westview Dr SW	Atlanta	GA	30310
14-0117-0002-008-2	0 Westview Dr SW	Atlanta	GA	30310
14-0117-0002-014-0	0 Westview Dr SW	Atlanta	GA	30310
14-0117-0002-104-9	0 Westview Dr SW	Atlanta	GA	30310
14-0117-0003-008-1	0 Westview Dr SW	Atlanta	GA	30310
14-0117-0003-010-7	926 Westview Dr SW	Atlanta	GA	30310
14-0117-0003-009-9	930 Westview Dr SW	Atlanta	GA	30310
14-0116-0010-089-3	931 Westview Dr SW	Atlanta	GA	30310
14-0116-0010-090-1	935 Westview Dr SW	Atlanta	GA	30310
14-0117-0003-007-3	938 Westview Dr SW	Atlanta	GA	30310
14-0116-0010-091-9	939 Westview Dr SW	Atlanta	GA	30310
14-0117-0003-064-4	940 Westview Dr SW	Atlanta	GA	30310
14-0116-0010-092-7	943 Westview Dr SW	Atlanta	GA	30310
14-0117-0003-004-0	944 Westview Dr SW	Atlanta	GA	30310
14-0117-0003-003-2	948 Westview Dr SW	Atlanta	GA	30310
14-0116-0010-094-3	949 Westview Dr SW	Atlanta	GA	30310
14-0117-0003-002-4	952 Westview Dr SW	Atlanta	GA	30310
14-0116-0010-095-0	953 Westview Dr SW	Atlanta	GA	30310
14-0116-0010-108-1	961 Westview Dr SW	Atlanta	GA	30310
14-0116-0010-100-8	975 Westview Dr SW	Atlanta	GA	30310
14-0116-0010-030-7	981 Westview Dr SW	Atlanta	GA	30310
14-0116-0010-029-9	985 Westview Dr SW	Atlanta	GA	30310

6. AHA-Owned, Managed, and Sponsored Communities and Properties (as of March 17, 2016)

Facilities and Land Owned or Acquired by AHA

Parcel ID	Address	City	State	Zip Code
14-0116-0010-028-1	993 Westview Dr SW	Atlanta	GA	30310
14-0117-0002-016-5	1006 Westview Dr SW	Atlanta	GA	30310
14-0117-0002-015-7	1012 Westview Dr SW	Atlanta	GA	30310
14-0117-0002-013-2	1018 Westview Dr SW	Atlanta	GA	30310
14-0117-0002-012-4	1020 Westview Dr SW	Atlanta	GA	30310
14-0117-0002-011-6	1022 Westview Dr SW	Atlanta	GA	30310
14-0117-0002-010-8	1026 Westview Dr SW	Atlanta	GA	30310
14-0117-0002-009-0	1030 Westview Dr SW	Atlanta	GA	30310
14-0117-0002-006-6	1040 Westview Dr SW	Atlanta	GA	30310
14-0117-0002-005-8	1044 Westview Dr SW	Atlanta	GA	30310
14-0117-0002-004-1	1048 Westview Dr SW	Atlanta	GA	30310
14-0117-0002-002-5	1056 Westview Dr SW	Atlanta	GA	30310
14-0117-0002-001-7	1060 Westview Dr SW	Atlanta	GA	30310
14-0085-0013-079-8	0 Whitehall Terrace SW	Atlanta	GA	30312
14-0085-0013-081-4	0 Whitehall Terrace SW	Atlanta	GA	30312
14-0085-0013-082-2	0 Whitehall Terrace SW	Atlanta	GA	30312
14-0085-0013-105-1	0 Whitehall Terrace SW	Atlanta	GA	30312
14-0085-0013-107-7	0 Whitehall Terrace SW	Atlanta	GA	30312
14-0085-0013-110-1	0 Whitehall Terrace SW	Atlanta	GA	30312
14-0085-0013-108-5	584 Whitehall Terrace SW	Atlanta	GA	30312
14-0085-0013-114-3	592 Whitehall Terrace SW	Atlanta	GA	30312
14-0085-0013-119-2	602 Whitehall Terrace SW	Atlanta	GA	30312
14-0045-0001-029-6	0 Wm Holmes Borders Sr Dr	Atlanta	GA	30312
14-0053-0001-105-3	0 Woodward Ave SE	Atlanta	GA	30312
14-0053-0001-106-1	0 Woodward Ave SE	Atlanta	GA	30312
14-0053-0001-103-8	79 Woodward Ave SE	Atlanta	GA	30312

7. Management Information for Owned/Managed Units at AHA-Owned Residential Communities and Assisted Units at Mixed-Income Communities (as of June 30, 2015)

Occupancy Rate			
<i>The ratio of occupied public housing units to available units as of the last day of the fiscal year shall be greater than or equal to the target benchmark.</i>			
Program / Community Type	AHA MTW Target (at least)	Actual Occupancy Rate (%)	Difference
AHA-Owned Residential Communities			
Barge Road Highrise	98%	99.2%	1.2%
Cheshire Bridge Road Highrise	98%	99.4%	1.4%
Cosby Spear Highrise	98%	99.3%	1.3%
East Lake Highrise	98%	100.0%	2.0%
Georgia Avenue Highrise	98%	100.0%	2.0%
Hightower Manor Highrise	98%	99.2%	1.2%
Juniper and Tenth Highrise	98%	98.0%	0.0%
Marian Road Highrise	98%	99.6%	1.6%
Marietta Road Highrise	98%	99.2%	1.2%
Martin Street Plaza	98%	94.9%	-3.1%
Peachtree Road Highrise	98%	99.5%	1.5%
Piedmont Road Highrise	98%	100.0%	2.0%
Westminster	98%	100.0%	2.0%
AHA-Owned Communities Average	98%	99.3%	1.3%
AHA-Sponsored Mixed-Income Communities			
Ashley Auburn Pointe I	98%	98.6%	0.6%
Ashley Auburn Pointe II	98%	100.0%	2.0%
Ashley CollegeTown	98%	100.0%	2.0%
Ashley CollegeTown II	98%	100.0%	2.0%
Ashley Courts at Cascade I	98%	97.3%	-0.7%
Ashley Courts at Cascade II	98%	99.4%	1.4%
Ashley Courts at Cascade III	98%	98.3%	0.3%
Ashley Terrace at West End	98%	97.8%	-0.2%
Atrium at CollegeTown	98%	97.7%	-0.3%
Capitol Gateway I	98%	98.9%	0.9%
Capitol Gateway II	98%	98.0%	0.0%
Columbia Commons	98%	99.0%	1.0%
Columbia Creste	98%	97.5%	-0.5%
Columbia Estate	98%	94.0%	-4.0%
Columbia Grove	98%	96.9%	-1.1%
Columbia Mechanicsville Apartments	98%	98.8%	0.8%
Columbia Park Citi	98%	99.2%	1.2%
Columbia Senior Residences at Mechanicsville	98%	98.6%	0.6%

7. Management Information for Owned/Managed Units at AHA-Owned Residential Communities and Assisted Units at Mixed-Income Communities (as of June 30, 2015)

Program / Community Type	AHA MTW Target (at least)	Actual Occupancy Rate (%)	Difference
AHA-Sponsored Mixed-Income Communities, cont.			
Columbia Village	98%	97.5%	-0.5% *
Magnolia Park I	98%	98.0%	0.0% †
Magnolia Park II	98%	94.5%	-3.5% †
Mechanicsville Crossing	98%	96.7%	-1.3% *
Mechanicsville Station	98%	97.6%	-0.4% *
Parkside at Mechanicsville	98%	99.5%	1.5%
The Gardens at CollegeTown	98%	100.0%	2.0%
Veranda at Auburn Pointe	98%	100.0%	2.0%
Village at Castleberry Hill I	98%	93.2%	-4.8% *
Village at Castleberry Hill II	98%	89.9%	-8.1% *
Villages at Carver I	98%	98.2%	0.2%
Villages at Carver II	98%	98.5%	0.5%
Villages at Carver III	98%	98.6%	0.6%
Villages at Carver V	98%	98.7%	0.7%
Villages of East Lake I	98%	96.4%	-1.6% *
Villages of East Lake II	98%	97.2%	-0.8% *
AHA-Sponsored Communities Average	98%	97.6%	-0.4% *
Public Housing-Assisted Average	98%	98%	0%

Meets
Benchmark

A. MANAGEMENT NOTES:

Overall, AHA had a combined occupancy rate of 98% for public housing assisted units in AHA-Owned Communities and AHA-Sponsored Mixed-Income Communities.

This was despite a shortfall in benchmark performance in some of the AHA-Sponsored Mixed-Income Communities (starred items above). These shortfalls, however, are due to mathematical rounding, or a difference 3 or fewer units in many of the communities below the benchmark.

The occupancy rate within communities with a low number of assisted units can skew downward with just one or two vacancies. Vacant unit turnovers often occurred just before the end of FY 2015. Those units were subsequently leased during the first month of the new fiscal year. Also, when multiple units were vacated around the same time, the communities often fell below their occupancy target.

Additionally, situations unique to some communities, such as extraordinary repairs, age of the waiting list, and property staff turnover affected the timing of leasing units before the reporting deadline.

Property managers will continue to utilize proactive management of the waiting list to ensure a ready pool of eligible applicants when a unit becomes available. AHA's portfolio management staff will continue to monitor occupancy in collaboration with the professional management companies responsible for the AHA-Sponsored Mixed-Income Communities in order to improve performance.

Each of the AHA-Sponsored Mixed-Income Communities, developed as a result of public-private partnerships, is owned by a private sector owner entity formed as a limited partnership with a managing general partner, and is managed by the owner entity's professional property management agent. While AHA does not own these communities, AHA engages the respective owner entities and their property management agents in its capacity as both a partner and asset manager by actively monitoring performance (including conducting periodic inspections, audits, and business process reviews), reviewing monthly and quarterly reports, making site visits and consulting with management agent and owner representatives at regularly scheduled meetings with respect to management and maintenance performance, financial oversight and occupancy tracking.

* Indicates a community that has reported individual performance below the benchmark.

† The Magnolia Park community is not factored into the overall results shown above because of substantial operational and financial challenges. HUD is aware of the situation and actions taken to resolve it. AHA is working closely with the managing general partner of the owner entities and the tax credit syndicator to resolve the issues.

7. Management Information for Owned/Managed Units at AHA-Owned Residential Communities and Assisted Units at Mixed-Income Communities (as of June 30, 2015)

Percent Rents Uncollected			
<i>Gross tenant rents receivable through the last day of the fiscal year divided by the total amount of tenant rents billed during the FY shall be less than or equal to the target benchmark.</i>			
Program / Community Type	AHA MTW Target (at most)	Actual Rents Uncollected (%)	Difference
AHA-Owned Residential Communities			
Barge Road Highrise	2%	0.1%	-1.9%
Cheshire Bridge Road Highrise	2%	0.0%	-2.0%
Cosby Spear Highrise	2%	0.6%	-1.4%
East Lake Highrise	2%	0.0%	-2.0%
Georgia Avenue Highrise	2%	0.0%	-2.0%
Hightower Manor Highrise	2%	0.5%	-1.5%
Juniper and Tenth Highrise	2%	1.1%	-0.9%
Marian Road Highrise	2%	0.0%	-2.0%
Marietta Road Highrise	2%	0.1%	-1.9%
Martin Street Plaza	2%	0.6%	-1.4%
Peachtree Road Highrise	2%	0.1%	-1.9%
Piedmont Road Highrise	2%	0.0%	-2.0%
Westminster	2%	0.0%	-2.0%
AHA-Owned Communities Average	2%	0.2%	-1.8%
AHA-Sponsored Mixed-Income Communities			
Ashley Auburn Pointe I	2%	0.5%	-1.5%
Ashley Auburn Pointe II	2%	0.2%	-1.8%
Ashley CollegeTown	2%	0.7%	-1.3%
Ashley CollegeTown II	2%	1.4%	-0.6%
Ashley Courts at Cascade I	2%	0.1%	-1.9%
Ashley Courts at Cascade II	2%	0.1%	-1.9%
Ashley Courts at Cascade III	2%	0.0%	-2.0%
Ashley Terrace at West End	2%	1.4%	-0.6%
Atrium at CollegeTown	2%	0.0%	-2.0%
Capitol Gateway I	2%	0.1%	-1.9%
Capitol Gateway II	2%	0.0%	-2.0%
Columbia Commons	2%	0.0%	-2.0%
Columbia Creste	2%	0.3%	-1.7%
Columbia Estate	2%	0.0%	-2.0%
Columbia Grove	2%	0.1%	-1.9%
Columbia Mechanicsville Apartments	2%	0.0%	-2.0%
Columbia Park Citi	2%	0.7%	-1.3%
Columbia Senior Residences at Mechanicsville	2%	2.5%	0.5%

*

7. Management Information for Owned/Managed Units at AHA-Owned Residential Communities and Assisted Units at Mixed-Income Communities (as of June 30, 2015)

Program / Community Type	AHA MTW Target (at most)	Actual Rents Uncollected (%)	Difference
AHA-Sponsored Mixed-Income Communities, cont.			
Columbia Village	2%	0.0%	-2.0%
Magnolia Park I	2%	2.6%	0.6%
Magnolia Park II	2%	16.1%	14.1%
Mechanicsville Crossing	2%	0.0%	-2.0%
Mechanicsville Station	2%	0.0%	-2.0%
Parkside at Mechanicsville	2%	1.6%	-0.4%
The Gardens at CollegeTown	2%	0.0%	-2.0%
Veranda at Auburn Pointe	2%	0.0%	-2.0%
Village at Castleberry Hill I	2%	1.7%	-0.3%
Village at Castleberry Hill II	2%	1.5%	-0.5%
Villages at Carver I	2%	0.3%	-1.7%
Villages at Carver II	2%	0.4%	-1.6%
Villages at Carver III	2%	3.9%	1.9%
Villages at Carver V	2%	1.0%	-1.0%
Villages of East Lake I	2%	0.0%	-2.0%
Villages of East Lake II	2%	0.0%	-2.0%
AHA-Sponsored Communities Average	2%	0.3%	-1.7%
Public Housing-Assisted Totals	2%	0.3%	-1.7%

Exceeds
Benchmark

A. MANAGEMENT NOTES:

Overall, AHA exceeded this benchmark. The AHA-Sponsored Mixed-Income Communities that fell below this benchmark (starred items above) were addressing issues relating to the impact of the economic downturn on resident households. The adverse effects of a depressed economy coupled with high unemployment in the Atlanta metropolitan area contributed to the volatility of rent collections especially for low-income working families who experienced layoffs or reduced hours. Additionally, some cases of households with overdue rent are in the termination process, which can last several months, wherein some households are court-ordered not to pay rents. AHA's portfolio management staff will continue to monitor uncollected rents in collaboration with the professional management companies responsible for the AHA-Sponsored Mixed-Income Communities in order to improve performance.

Each of the AHA-Sponsored Mixed-Income Communities, developed as a result of public-private partnerships, is owned by a private sector owner entity formed as a limited partnership with a managing general partner, and is managed by the owner entity's professional property management agent. While AHA does not own these communities, AHA engages the respective owner entities and their property management agents in its capacity as both a partner and asset manager by actively monitoring performance (including conducting periodic inspections, audits, and business process reviews), reviewing monthly and quarterly reports, making site visits and consulting with management agent and owner representatives at regularly scheduled meetings with respect to management and maintenance performance, financial oversight and occupancy tracking.

* Indicates a community that has reported individual performance below the benchmark.

† The Magnolia Park community is not factored into the overall results shown above because of substantial operational and financial challenges. HUD is aware of the situation and actions taken to resolve it. AHA is working closely with the managing general partner of the owner entities and the tax credit syndicator to resolve the issues.

7. Management Information for Owned/Managed Units at AHA-Owned Residential Communities and Assisted Units at Mixed-Income Communities (as of June 30, 2015)

Emergency Work Orders Completed or Abated in <24 Hours			
<i>The percentage of emergency work orders that are completed or abated within 24 hours of issuance of the work order shall be greater than or equal to the target benchmark. (Abated is defined as "emergency resolved through temporary measure, and a work order for long term resolution has been issued.")</i>			
Program / Community Type	AHA MTW Target (at least)	Actual Emergency Work Orders Completed / Abated in <24 hrs (%)	Difference
AHA-Owned Residential Communities			
Barge Road Highrise	99%	100%	1.0%
Cheshire Bridge Road Highrise	99%	100%	1.0%
Cosby Spear Highrise	99%	100%	1.0%
East Lake Highrise	99%	100%	1.0%
Georgia Avenue Highrise	99%	100%	1.0%
Hightower Manor Highrise	99%	100%	1.0%
Juniper and Tenth Highrise	99%	100%	1.0%
Marian Road Highrise	99%	100%	1.0%
Marietta Road Highrise	99%	100%	1.0%
Martin Street Plaza	99%	100%	1.0%
Peachtree Road Highrise	99%	100%	1.0%
Piedmont Road Highrise	99%	100%	1.0%
Westminster	99%	100%	1.0%
AHA-Owned Communities Average	99%	100.0%	1.0%
AHA-Sponsored Mixed-Income Communities			
Ashley Auburn Pointe I	99%	100%	1.0%
Ashley Auburn Pointe II	99%	100%	1.0%
Ashley CollegeTown	99%	100%	1.0%
Ashley CollegeTown II	99%	100%	1.0%
Ashley Courts at Cascade I	99%	100%	1.0%
Ashley Courts at Cascade II	99%	100%	1.0%
Ashley Courts at Cascade III	99%	100%	1.0%
Ashley Terrace at West End	99%	100%	1.0%
Atrium at CollegeTown	99%	100%	1.0%
Capitol Gateway I	99%	100%	1.0%
Capitol Gateway II	99%	100%	1.0%
Columbia Commons	99%	100%	1.0%
Columbia Creste	99%	100%	1.0%
Columbia Estate	99%	100%	1.0%
Columbia Grove	99%	100%	1.0%
Columbia Mechanicsville Apartments	99%	100%	1.0%
Columbia Park Citi	99%	100%	1.0%
Columbia Senior Residences at Mechanicsville	99%	100%	1.0%

7. Management Information for Owned/Managed Units at AHA-Owned Residential Communities and Assisted Units at Mixed-Income Communities (as of June 30, 2015)

Program / Community Type	AHA MTW Target (at least)	Actual Emergency Work Orders Completed / Abated in <24 hrs (%)	Difference
AHA-Sponsored Mixed-Income Communities, cont.			
Columbia Village	99%	100%	1.0%
Magnolia Park I	99%	100%	1.0%
Magnolia Park II	99%	100%	1.0%
Mechanicsville Crossing	99%	100%	1.0%
Mechanicsville Station	99%	100%	1.0%
Parkside at Mechanicsville	99%	100%	1.0%
The Gardens at CollegeTown	99%	100%	1.0%
Veranda at Auburn Pointe	99%	100%	1.0%
Village at Castleberry Hill I	99%	100%	1.0%
Village at Castleberry Hill II	99%	100%	1.0%
Villages at Carver I	99%	100%	1.0%
Villages at Carver II	99%	100%	1.0%
Villages at Carver III	99%	100%	1.0%
Villages at Carver V	99%	100%	1.0%
Villages of East Lake I	99%	100%	1.0%
Villages of East Lake II	99%	100%	1.0%
AHA-Sponsored Communities Average	99%	100.0%	1.0%
Public Housing-Assisted Totals	99%	100.0%	1.0%

Exceeds
Benchmark

A. MANAGEMENT NOTES:

AHA exceeded this benchmark by completing or abating approximately 99.9% of emergency work orders within 24 hours.

This was despite a shortfall in benchmark performance at two of the AHA-Sponsored Mixed-Income Communities (starred items above).

Each of the AHA-Sponsored Mixed-Income Communities, developed as a result of public-private partnerships, is owned by a private sector owner entity formed as a limited partnership with a managing general partner, and is managed by the owner entity's professional property management agent. While AHA does not own these communities, AHA engages the respective owner entities and their property management agents in its capacity as both a partner and asset manager by actively monitoring performance (including conducting periodic inspections, audits, and business process reviews), reviewing monthly and quarterly reports, making site visits and consulting with management agents and owner representatives at regularly scheduled meetings with respect to management and maintenance performance, financial oversight and occupancy tracking.

* Indicates a community that has reported individual performance below the benchmark.

† The Magnolia Park community is not factored into the overall results shown above because of substantial operational and financial challenges. HUD is aware of the situation and actions taken to resolve it. AHA is working closely with the managing general partner of the owner entities and the tax credit syndicator to resolve the issues.

7. Management Information for Owned/Managed Units at AHA-Owned Residential Communities and Assisted Units at Mixed-Income Communities (as of June 30, 2015)

Routine Work Orders Completed in < 7 Days			
<i>The average number of days that all non-emergency work orders will be active during the fiscal year shall be 7 days or less.</i>			
Program / Community Type	AHA MTW Target (at most)	Actual Average Days to Complete Routine Work Orders (# days)	Difference
AHA-Owned Residential Communities			
Barge Road Highrise	7	1	-5.8
Cheshire Bridge Road Highrise	7	1	-6.0
Cosby Spear Highrise	7	2	-5.3
East Lake Highrise	7	1	-5.9
Georgia Avenue Highrise	7	1	-5.8
Hightower Manor Highrise	7	2	-5.2
Juniper and Tenth Highrise	7	2	-4.7
Marian Road Highrise	7	1	-6.0
Marietta Road Highrise	7	2	-5.1
Martin Street Plaza	7	1	-6.0
Peachtree Road Highrise	7	1	-5.7
Piedmont Road Highrise	7	1	-5.5
Westminster	7	1	-6.0
AHA-Owned Communities Average	7	1.5	-5.5
AHA-Sponsored Mixed-Income Communities			
Ashley Auburn Pointe I	7	3	-4.4
Ashley Auburn Pointe II	7	3	-3.6
Ashley CollegeTown	7	1	-6.0
Ashley CollegeTown II	7	1	-5.9
Ashley Courts at Cascade I	7	1	-6.0
Ashley Courts at Cascade II	7	1	-6.0
Ashley Courts at Cascade III	7	1	-6.0
Ashley Terrace at West End	7	1	-5.8
Atrium at CollegeTown	7	1	-6.0
Capitol Gateway I	7	2	-4.8
Capitol Gateway II	7	2	-5.0
Columbia Commons	7	3	-4.0
Columbia Creste	7	2	-5.4
Columbia Estate	7	2	-4.8
Columbia Grove	7	2	-5.3
Columbia Mechanicsville Apartments	7	3	-4.0
Columbia Park Citi	7	3	-4.1
Columbia Senior Residences at Mechanicsville	7	2	-4.9

7. Management Information for Owned/Managed Units at AHA-Owned Residential Communities and Assisted Units at Mixed-Income Communities (as of June 30, 2015)

Program / Community Type	AHA MTW Target (at most)	Actual Average Days to Complete Routine Work Orders (# days)	Difference
AHA-Sponsored Mixed-Income Communities, cont.			
Columbia Village	7	2	-5.0
Magnolia Park I	7	3	-4.3
Magnolia Park II	7	3	-4.5
Mechanicsville Crossing	7	2	-5.4
Mechanicsville Station	7	1	-5.6
Parkside at Mechanicsville	7	2	-5.0
The Gardens at CollegeTown	7	1	-6.0
Veranda at Auburn Pointe	7	1	-6.0
Village at Castleberry Hill I	7	1	-5.7
Village at Castleberry Hill II	7	1	-5.6
Villages at Carver I	7	2	-5.2
Villages at Carver II	7	2	-4.7
Villages at Carver III	7	2	-5.1
Villages at Carver V	7	2	-4.8
Villages of East Lake I	7	2	-4.5
Villages of East Lake II	7	3	-4.4
AHA-Sponsored Communities Average	7	2.1	-4.9
Public Housing-Assisted Totals	7	1.8	-5.2

Exceeds
Benchmark

A. MANAGEMENT NOTES:

AHA exceeded this benchmark by fulfilling routine work orders on average within 1.8 days, which is far less time than the 7-day target.

Each of the AHA-Sponsored Mixed-Income Communities, developed as a result of public-private partnerships, is owned by a private sector owner entity formed as a limited partnership with a managing general partner, and is managed by the owner entity's professional property management agent. While AHA does not own these communities, AHA engages the respective owner entities and their property management agents in its capacity as both a partner and asset manager by actively monitoring performance (including conducting periodic inspections, audits, and business process reviews), reviewing monthly and quarterly reports, making site visits and consulting with management agent and owner representatives with respect to management and maintenance performance, financial oversight and occupancy tracking.

† The Magnolia Park community is not factored into overall result shown above because of substantial operational and financial challenges. HUD is aware of the situation and actions taken to resolve it. AHA is working closely with the managing general partner of the owner entities and the tax credit syndicator to resolve the issues.

7. Management Information for Owned/Managed Units at AHA-Owned Residential Communities and Assisted Units at Mixed-Income Communities (as of June 30, 2015)

Percent Planned Inspections Completed			
<i>The percentage of all occupied units and common areas that are inspected during the fiscal year shall be greater than or equal to the target benchmark.</i>			
Program / Community Type	AHA MTW Target (at least)	Actual Inspections Completed (%)	Difference
AHA-Owned Residential Communities			
Barge Road Highrise	100%	100%	0%
Cheshire Bridge Road Highrise	100%	100%	0%
Cosby Spear Highrise	100%	100%	0%
East Lake Highrise	100%	100%	0%
Georgia Avenue Highrise	100%	100%	0%
Hightower Manor Highrise	100%	100%	0%
Juniper and Tenth Highrise	100%	100%	0%
Marian Road Highrise	100%	100%	0%
Marietta Road Highrise	100%	100%	0%
Martin Street Plaza	100%	100%	0%
Peachtree Road Highrise	100%	100%	0%
Piedmont Road Highrise	100%	100%	0%
Westminster	100%	100%	0%
AHA-Owned Communities Average	100%	100%	0%
AHA-Sponsored Mixed-Income Communities			
Ashley Auburn Pointe I	100%	100%	0%
Ashley Auburn Pointe I	100%	100%	0%
Ashley CollegeTown	100%	100%	0%
Ashley CollegeTown II	100%	100%	0%
Ashley Courts at Cascade I	100%	100%	0%
Ashley Courts at Cascade II	100%	100%	0%
Ashley Courts at Cascade III	100%	100%	0%
Ashley Terrace at West End	100%	100%	0%
Atrium at CollegeTown	100%	100%	0%
Capitol Gateway I	100%	100%	0%
Capitol Gateway II	100%	100%	0%
Columbia Commons	100%	100%	0%
Columbia Creste	100%	100%	0%
Columbia Estate	100%	100%	0%
Columbia Grove	100%	100%	0%
Columbia Mechanicsville Apartments	100%	100%	0%
Columbia Park Citi	100%	100%	0%
Columbia Senior Residences at Mechanicsville	100%	100%	0%

7. Management Information for Owned/Managed Units at AHA-Owned Residential Communities and Assisted Units at Mixed-Income Communities (as of June 30, 2015)

Program / Community Type	AHA MTW Target (at least)	Actual Inspections Completed (%)	Difference
AHA-Sponsored Mixed-Income Communities, cont.			
Columbia Village	100%	100%	0%
Magnolia Park I	100%	100%	0%
Magnolia Park II	100%	100%	0%
Mechanicsville Crossing	100%	100%	0%
Mechanicsville Station	100%	100%	0%
Parkside at Mechanicsville	100%	100%	0%
The Gardens at CollegeTown	100%	100%	0%
Veranda at Auburn Pointe	100%	100%	0%
Village at Castleberry Hill I	100%	100%	0%
Village at Castleberry Hill II	100%	100%	0%
Villages at Carver I	100%	100%	0%
Villages at Carver II	100%	100%	0%
Villages at Carver III	100%	100%	0%
Villages at Carver V	100%	100%	0%
Villages of East Lake I	100%	100%	0%
Villages of East Lake II	100%	100%	0%
AHA-Sponsored Communities Average	100%	100%	0.0%
Public Housing-Assisted Totals	100%	100.0%	0.0%

Meets
Benchmark

A. MANAGEMENT NOTES:

AHA completed 100 percent of its planned inspections. Each AHA-Owned Residential Community and the Owner Entity of the AHA-Sponsored Mixed-Income Communities, through their respective property management agents, are required to inspect 10 percent of the public housing-assisted units at each property monthly. At year end, each site's agent is required to certify that 100 percent of all units, buildings, and common areas have been inspected and work orders have been completed to address deficiencies.

Each of the AHA-Sponsored Mixed-Income Communities, developed as a result of public-private partnerships, is owned by a private sector owner entity formed as a limited partnership with a managing general partner, and is managed by the owner entity's professional property management agent. While AHA does not own these communities, AHA engages the respective owner entities and their property management agents in its capacity as both a partner and asset manager by actively monitoring performance (including conducting periodic inspections, audits, and business process reviews), reviewing monthly and quarterly reports, making site visits and consulting with management agent and owner representatives at regularly scheduled meetings with respect to management and maintenance performance, financial oversight and occupancy tracking.

† The Magnolia Park community is not factored into overall result shown above because of substantial operational and financial challenges. HUD is aware of the situation and actions taken to resolve it. AHA is working closely with the managing general partner and the tax credit syndicator to resolve the issues.

7. Management Information for Owned/Managed Units at AHA-Owned Residential Communities and Assisted Units at Mixed-Income Communities (as of June 30, 2015)

Inspections Strategy

AHA Reviews of AHA-Sponsored Mixed-Income Communities

(1) **Physical Real Estate/Operational:** An annual Business Process Review is conducted at all Mixed-Income Communities. The Business Process Review includes a review of the property operations as well as a physical review of a sample of the greater of five (5) units or 5% of the AHA-Assisted Units. The purpose of the annual review is 1) to confirm that site-based administration activities are in compliance with AHA policies, federal requirements and various legal agreements defining the obligations of the owner entities and professional property management companies with respect to the management, maintenance and operations of the respective properties, and 2) to streamline and enhance the compliance review process by utilizing audits, inspections and compliance reviews conducted by other agencies and compliance contractors.

(2) **Business Process Reviews:** Through Business Process Reviews, Asset Management has been able to strengthen AHA's internal controls and external oversight of owner entity and property management performance related to maintenance of the site-based waiting list, operations, physical conditions of the portfolio, enforcement of AHA's Work / Program Requirement, rent determination, and accessibility.

(3) **Financial:** AHA also reviews the audited financial statements of the Mixed-Income Communities, identifying any trends that may affect the long-term financial viability and sustainability of the underlying asset. When there are going concerns, impairments, audit findings or material adverse changes that may impact the ability to meet current or future obligations, AHA works with the Owner to ensure the deficiencies are resolved and develop a corrective action plan, as necessary.

AHA Reviews of AHA-Owned Residential Communities

Through its quality assurance program, AHA is focused on maintaining quality living environments throughout the AHA-Owned real estate portfolio. AHA provides an integrated assessment of the status of each property, and works closely with its Property Management-Developer Company (PMD) partners to identify and proactively address issues at the properties.

The emphases and outcomes of each element of the quality assurance program are as follows:

(1) **Uniform Physical Conditions Standards (UPCS):** AHA conducts UPCS quality assurance inspections annually at each property. A minimum of 5% of the units, all common areas, and all building systems are inspected. The inspections result in a reduction of systemic maintenance issues and an overall improvement in the physical condition of the communities.

(2) **Elevator:** AHA's elevator consultant continues to provide an annual audit for each elevator at the high-rise communities, as well as to coordinate with the PMDs on equipment modernization and ongoing routine maintenance. Improved equipment maintenance has led to improved operational up-time as well as a significant decrease in resident complaints concerning elevators.

(3) **Rental Integrity Monitoring (RIM):** The RIM review, conducted annually at each property, focuses on procedures related to the complete occupancy life-cycle from the application to termination. The findings from RIM help in the design of staff training, which has, in turn, reduced the amount of errors identified.

(4) **Procurement/Contracts:** AHA conducts this regular on-site review to audit procedures related to the PMD procurements and contract management. PMD staff have made significant progress in maintaining best practices for documentation of contract administration and in public transparency and accountability.

(5) **Finance/Accounting:** This internal financial audit, conducted annually at each property, is beneficial in identifying areas of concern within the properties' fiscal operations.

(6) **Community Safety/Risk:** This inspection of requirements for property administrative, technical, and physical security systems enables the PMDs to identify and mitigate safety issues at the communities. This inspection, conducted annually at each property, also includes items in accordance with AHA's Risk/Safety program (inspections, analysis, etc.), which complies with the Insurer's Work Plan instituted by our liability insurance company. AHA insurance premiums have been reduced as a result of AHA's Risk/Safety program.

(7) **Accessibility:** Accessibility inspections are conducted at each property annually to ensure each community's compliance with applicable Fair Housing and accessibility statutes, HUD guidelines, and AHA's related policies and procedures. These inspections enable AHA to have early detection and resolution of accessibility issues, identify process improvements, and identify topics for staff training.

7. Management Information for Owned/Managed Units at AHA-Owned Residential Communities and Assisted Units at Mixed-Income Communities (as of June 30, 2015)

Security

AHA has continued to address crime and safety in the communities through collaborative strategies with its private development partners, PMDs, local law enforcement, and residents. AHA continues to aggressively combat crime by:

- (1) Dedicating over \$1.6 million during FY 2016 at the AHA-Owned Residential Communities to:
 - a) reduce the security presence of concierges/security staff on the properties, and
 - b) provide video surveillance and a community security channel,
- (2) Utilizing visitor management systems at the high-rise AHA-Owned Residential Communities to further monitor access to the buildings,
- (3) Collaborating with the Atlanta Police Department to identify strategies to deter crime and enhance safety and security at AHA-Owned Residential Communities and AHA-Sponsored Mixed-Income Communities,
- (4) Continuing utilization of enhanced criminal screening standards and processes and strict lease enforcement, and
- (5) Completing the necessary preventive maintenance and repairs to ensure security equipment remains operational on a routine basis.

Information Required for Conversions Under the Rental Assistance Demonstration (RAD)¹

The Atlanta Housing Authority (AHA) plans to move forward with RAD conversions for the balance of the AHA-owned public housing communities and anticipates submitting RAD applications for property conversions at the following properties: Barge Road Highrise, Cheshire Bridge Road Highrise, Cosby Spear Highrise, East Lake Highrise, Georgia Avenue Highrise, Hightower Manor Highrise, Marian Road Highrise, Marietta Road Highrise, Martin Street Plaza, Peachtree Road Highrise and Westminster. AHA also plans to move forward with RAD conversions for the public housing units in certain AHA-Sponsored Mixed-Income communities and anticipates submitting RAD applications for property conversions at the following properties: Village at Castleberry Hill I, Village at Castleberry Hill II, Villages of East Lake I, Villages of East Lake II, and Villages at Carver. AHA anticipates that AHA may submit and HUD may approve RAD Applications for some of these properties in FY 2017 and as a result, AHA will convert the public housing-assisted units at these properties to Project Based Vouchers (PBV) under the RAD guidelines in PIH Notice 2012-32, REV-1 and any successor Notices, as may be applicable to AHA pursuant to AHA's Amended and Restated MTW Agreement and any successor MTW agreement.

Upon conversion to Project Based Vouchers AHA will adopt the PBV resident rights, participation, waiting list and grievance procedures for the RAD developments, unless otherwise waived by HUD. AHA is currently working with HUD to request HUD approval by waiver under RAD (to the extent necessary) of AHA's MTW Project Based Rental Assistance (MTW-PBRA) program, which would authorize AHA to administer the resident rights, participation, waiting list and grievance procedures in accordance with AHA's MTW PBRA program policies and procedures currently practiced by AHA using its MTW flexibility. HUD guidelines for resident rights, participation, waiting list and grievance procedures are set forth in Section 1.6 of PIH Notice 2012-32, REV-2; and Joint Housing PIH Notice H-2014-09/PIH-2014-17. AHA certifies that it is currently compliant with all fair housing and civil rights requirements.

RAD was designed by HUD to assist in addressing the capital needs of public housing by providing public housing agencies like AHA with access to private sources of capital to repair and preserve AHA's affordable housing assets. Please be aware that upon conversion, AHA's Capital Fund Budget will be reduced by the pro rata share of Public Housing Developments converted as part of the Demonstration, and that AHA's development partner for each property may borrow funds to address the capital needs at the properties. AHA anticipates contributing MTW Funds and/or Replacement Housing Factor (RHF) Funds towards the RAD conversion of these properties.

AHA has debt under an Energy Performance Contract. Working with Johnson Controls Inc. and Bank of America, N. A., AHA plans to use MTW funds to pay off the outstanding debt for each AHA-Owned property when each property converts. This will have no direct impact on HUD operating funding to AHA since at RAD conversion, the public housing operating subsidy will be replaced with an equal amount of Housing Choice funding for the converted properties.

As an MTW agency, AHA may use its MTW Funds to supplement contract rents for the RAD developments. No additional voucher funding will be provided by HUD. Given these funding changes that may occur as a result of conversion under RAD, AHA will research all options. While maintaining continued service requirements is a high priority for the agency, AHA does not anticipate any reductions in services due to RAD.

¹ Based on HUD requirements for RAD in HUD PIH Notice 2012-32

Below, please find specific information related to the **AHA-Owned Residential Communities** (public housing developments) AHA intends to convert through RAD and for which AHA may submit RAD applications in FY 2017:

Name	PIC Dev ID	Conversion Type	Transfer of Assistance
Barge Road Highrise	GA006000540	PBV	No
Total Units	Pre-RAD Unit Type	Post-RAD Unit Type	Capital Fund Allocation
129	Near Elderly, Elderly and Non-Elderly Disabled	Housing for Elderly Persons	\$171,213
Bedroom Type:	Number of Units Pre-Conversion	Number of Units Post-Conversion	Change in Number of Units
One Bedroom*	128	128	No change
Two Bedroom	1	1	No change

**A current Unit Out of Occupancy (UOO) will continue to remain a common area and serve as a fitness room. This unit is not included in the unit count above for either pre or post-RAD.*

Name	PIC Dev ID	Conversion Type	Transfer of Assistance
Cheshire Bridge Road Highrise	GA006000470	PBV	No
Total Units	Pre-RAD Unit Type	Post-RAD Unit Type	Capital Fund Allocation
162	Near Elderly, Elderly and Non-Elderly Disabled	Housing for Elderly Persons	\$210,387
Bedroom Type:	Number of Units Pre-Conversion	Number of Units Post-Conversion	Change in Number of Units
One Bedroom	161	161	No change
Two Bedroom	1	1	No change

Name	PIC Dev ID	Conversion Type	Transfer of Assistance
Cosby Spear Highrise	GA006000241	PBV	No
Total Units	Pre-RAD Unit Type	Post-RAD Unit Type	Capital Fund Allocation
282	Near Elderly, Elderly and Non-Elderly Disabled	Housing for Elderly Persons	\$339,423
Bedroom Type:	Number of Units Pre-Conversion	Number of Units Post-Conversion	Change in Number of Units
Studio	166	166	No change
One Bedroom	114	114	No change
Two Bedroom	2	2	No change

Name	PIC Dev ID	Conversion Type	Transfer of Assistance
East Lake Highrise	GA006000300	PBV	No
Total Units	Pre-RAD Unit Type	Post-RAD Unit Type	Capital Fund Allocation
149	Near Elderly, Elderly and Non-Elderly Disabled	Housing for Elderly Persons	\$179,840
Bedroom Type:	Number of Units Pre-Conversion	Number of Units Post-Conversion	Change in Number of Units
Studio	88	88	No change
One Bedroom*	61	61	No change

*A current Unit Out of Occupancy (UOO) will continue to remain a common area and serve as a public restroom. This unit is not included in the unit count above for either pre or post-RAD.

Name	PIC Dev ID	Conversion Type	Transfer of Assistance
Georgia Avenue Highrise	GA006000250	PBV	No
Total Units	Pre-RAD Unit Type	Post-RAD Unit Type	Capital Fund Allocation
79	Near Elderly, Elderly and Non-Elderly Disabled	Housing for Elderly Persons	\$105,882
Bedroom Type:	Number of Units Pre-Conversion	Number of Units Post-Conversion	Change in Number of Units
One Bedroom*	78	78	No change
Two Bedroom	1	1	No change

*Two current Units Out of Occupancy (UOO) will continue to remain common area. One unit will serve as a fitness room, and the other unit will serve as billiards room and resident activity room. These units are not included in the unit count above for either pre or post-RAD.

Name	PIC Dev ID	Conversion Type	Transfer of Assistance
Hightower Manor Highrise	GA006000530	PBV	No
Total Units	Pre-RAD Unit Type	Post-RAD Unit Type	Capital Fund Allocation
129	Near Elderly, Elderly and Non-Elderly Disabled	Housing for Elderly Persons	\$171,540
Bedroom Type:	Number of Units Pre-Conversion	Number of Units Post-Conversion	Change in Number of Units
One Bedroom*	129	129	No change

*A current Unit Out of Occupancy (UOO) will continue to remain a common area and serve as a TV & media room. This unit is not included in the unit count above for either pre or post-RAD.

Name	PIC Dev ID	Conversion Type	Transfer of Assistance
Marian Road Highrise	GA006000520	PBV	No
Total Units	Pre-RAD Unit Type	Post-RAD Unit Type	Capital Fund Allocation
240	Near Elderly, Elderly and Non-Elderly Disabled	Housing for Elderly Persons	\$314,801
Bedroom Type:	Number of Units Pre-Conversion	Number of Units Post-Conversion	Change in Number of Units
One Bedroom	239	239	No change
Two Bedroom	1	1	No change

Name	PIC Dev ID	Conversion Type	Transfer of Assistance
Marietta Road Highrise	GA006000580	PBV	No
Total Units	Pre-RAD Unit Type	Post-RAD Unit Type	Capital Fund Allocation
129	Near Elderly, Elderly and Non-Elderly Disabled	Housing for Elderly Persons	\$171,324
Bedroom Type:	Number of Units Pre-Conversion	Number of Units Post-Conversion	Change in Number of Units
One Bedroom*	128	128	No change
Two Bedroom	1	1	No change

*A current Unit Out of Occupancy (UOO) will continue to remain a common area and serve as resident association offices. This unit is not included in the unit count above for either pre or post-RAD.

Name	PIC Dev ID	Conversion Type	Transfer of Assistance
Peachtree Road Highrise	GA006000450	PBV	No
Total Units	Pre-RAD Unit Type	Post-RAD Unit Type	Capital Fund Allocation
196	Near Elderly, Elderly and Non-Elderly Disabled	Housing for Elderly Persons	\$255,837
Bedroom Type:	Number of Units Pre-Conversion	Number of Units Post-Conversion	Change in Number of Units
One Bedroom*	196	196	No change

*A current Unit Out of Occupancy (UOO) will continue to remain a common area and serve as resident services offices. This unit is not included in the unit count above for either pre or post-RAD.

Name	PIC Dev ID	Conversion Type	Transfer of Assistance
Martin Street Plaza	GA006000560	PBV	No
Total Units	Pre-RAD Unit Type	Post-RAD Unit Type	Capital Fund Allocation
59	Family	Family	\$99,140
Bedroom Type:	Number of Units Pre-Conversion	Number of Units Post-Conversion	Change in Number of Units
Two Bedroom*	10	10	No change
Three Bedroom	20	20	No change
Four Bedroom	29	29	No change

*A current Unit Out of Occupancy (UOO) will continue to remain a common area and serve as resident association offices. This unit is not included in the unit count above for either pre or post-RAD.

Name	PIC Dev ID	Conversion Type	Transfer of Assistance
Westminster	GA006000440	PBV	No
Total Units	Pre-RAD Unit Type	Post-RAD Unit Type	Capital Fund Allocation
32	Family	Family	\$45,661
Bedroom Type:	Number of Units Pre-Conversion	Number of Units Post-Conversion	Change in Number of Units
One Bedroom	2	2	No change
Two Bedroom	30	30	No change

Below, please find specific information related to the **AHA-Sponsored Mixed-Income Communities** (mixed-income, mixed-finance developments) AHA intends to convert the public housing-assisted units through RAD and for which AHA may submit RAD applications in FY 2017:

Name	PIC Dev ID	Conversion Type	Transfer of Assistance
Village at Castleberry Hill I	GA006000061	PBV	No
Total Units	Pre-RAD Unit Type	Post-RAD Unit Type	Capital Fund Allocation
66	Mixed-Income Family	Mixed-Income Family	\$48,605
Bedroom Type:	Number of Units Pre-Conversion	Number of Units Post-Conversion	Change in Number of Units
One Bedroom	0	0	No change
Two Bedroom	58	58	No change
Three Bedroom	8	8	No change
Four Bedroom	0	0	No change

Name	PIC Dev ID	Conversion Type	Transfer of Assistance
Village at Castleberry Hill II	GA006000082	PBV	No
Total Units	Pre-RAD Unit Type	Post-RAD Unit Type	Capital Fund Allocation
114	Family	Family	\$84,789
Bedroom Type:	Number of Units Pre-Conversion	Number of Units Post-Conversion	Change in Number of Units
One Bedroom	36	36	No change
Two Bedroom	60	60	No change
Three Bedroom	18	18	No change
Four Bedroom	0	0	No change

Name	PIC Dev ID	Conversion Type	Transfer of Assistance
Villages of East Lake I	GA006000078	PBV	No
Total Units	Pre-RAD Unit Type	Post-RAD Unit Type	Capital Fund Allocation
104	Family	Family	\$88,458
Bedroom Type:	Number of Units Pre-Conversion	Number of Units Post-Conversion	Change in Number of Units
One Bedroom	0	0	No change
Two Bedroom	40	40	No change
Three Bedroom	46	46	No change
Four Bedroom	18	18	No change

Name	PIC Dev ID	Conversion Type	Transfer of Assistance
Villages of East Lake II	GA006000081	PBV	No
Total Units	Pre-RAD Unit Type	Post-RAD Unit Type	Capital Fund Allocation
162	Family	Family	\$132,814
Bedroom Type:	Number of Units Pre-Conversion	Number of Units Post-Conversion	Change in Number of Units
One Bedroom	23	23	No change
Two Bedroom	89	89	No change
Three Bedroom	50	50	No change
Four Bedroom	0	0	No change

Name	PIC Dev ID	Conversion Type	Transfer of Assistance
Villages at Carver I	GA006000091	PBV	No
Total Units	Pre-RAD Unit Type	Post-RAD Unit Type	Capital Fund Allocation
110	Mixed-Income Family	Mixed-Income Family	\$85,800
Bedroom Type:	Number of Units Pre-Conversion	Number of Units Post-Conversion	Change in Number of Units
One Bedroom	24	24	No change
Two Bedroom	54	54	No change
Three Bedroom	30	30	No change
Four Bedroom	2	2	No change

Name	PIC Dev ID	Conversion Type	Transfer of Assistance
Villages at Carver II	GA006000091	PBV	No
Total Units	Pre-RAD Unit Type	Post-RAD Unit Type	Capital Fund Allocation
33	Mixed-Income Family	Mixed-Income Family	\$28,512
Bedroom Type:	Number of Units Pre-Conversion	Number of Units Post-Conversion	Change in Number of Units
One Bedroom	0	0	No change
Two Bedroom	17	17	No change
Three Bedroom	16	16	No change
Four Bedroom	0	0	No change

Name	PIC Dev ID	Conversion Type	Transfer of Assistance
Villages at Carver III	GA006000091	PBV	No
Total Units	Pre-RAD Unit Type	Post-RAD Unit Type	Capital Fund Allocation
109	Mixed-Income Family	Mixed-Income Family	\$87,636
Bedroom Type:	Number of Units Pre-Conversion	Number of Units Post-Conversion	Change in Number of Units
One Bedroom	24	24	No change
Two Bedroom	45	45	No change
Three Bedroom	35	35	No change
Four Bedroom	5	5	No change

Name	PIC Dev ID	Conversion Type	Transfer of Assistance
Villages at Carver V	GA006000102	PBV	No
Total Units	Pre-RAD Unit Type	Post-RAD Unit Type	Capital Fund Allocation
78	Mixed-Income Family	Mixed-Income Family	\$58,968
Bedroom Type:	Number of Units Pre-Conversion	Number of Units Post-Conversion	Change in Number of Units
One Bedroom	16	15	No change
Two Bedroom	57	57	No change
Three Bedroom	5	5	No change
Four Bedroom	0	0	No change



The Housing Authority of the City of Atlanta, Georgia

Comprehensive Budget

**For the Fiscal Year
Beginning July 1, 2015 and Ending June 30, 2016**

Approved by AHA's Board of Commissioners at the June 16, 2015 Meeting

TABLE OF CONTENTS

Mission and Vision Statements.....	2
AHA’s Board of Commissioners.....	3
AHA’s Organization.....	4
Budget Overview.....	5
Sources and Uses of Funds (Flowchart).....	9
Budget Presentation.....	10
Budget Financial Highlights.....	10
Sources of Funds Assumptions.....	11
Uses of Funds Assumptions.....	16
Reclassifications within the FY 2016 Budget.....	22
Actual to Budget Reporting.....	23
Budget Risks.....	23

FY 2016 Comprehensive Budget Financial Schedules

Sources and Uses of Funds

- I Sources & Uses of Funds by Major Activities and Programs
- II Housing Assistance and Operating Subsidy Payments
 - II.A Project-Based Housing Assistance (PBRA)
 - II.B Mixed-Income Communities Operating Subsidy for AHA-Assisted Units
- III Operating Divisions Expense
 - III.A Operating Divisions Expense by Category
- IV Corporate Support Expense
 - IV.A Corporate Support Expense by Category
- V Human Development Support and Community Relations
- VI Operating Expense for AHA-Owned Residential Communities and Other AHA Properties
 - VI.A Operating Expense for AHA-Owned Residential Communities and Other AHA Properties by Category
- VII Capital Expenditures for Preservation of AHA-Owned Residential Communities and AHA Headquarters
- VIII Development and Revitalization
 - VIII.A Development and Revitalization by Community/Property
 - VIII.A.1 RAD Conversion by Community
 - VIII.A.2 Other Development by Property
- IX ERP Solution
 - IX.A ERP Program Spending Final Report

MISSION STATEMENT

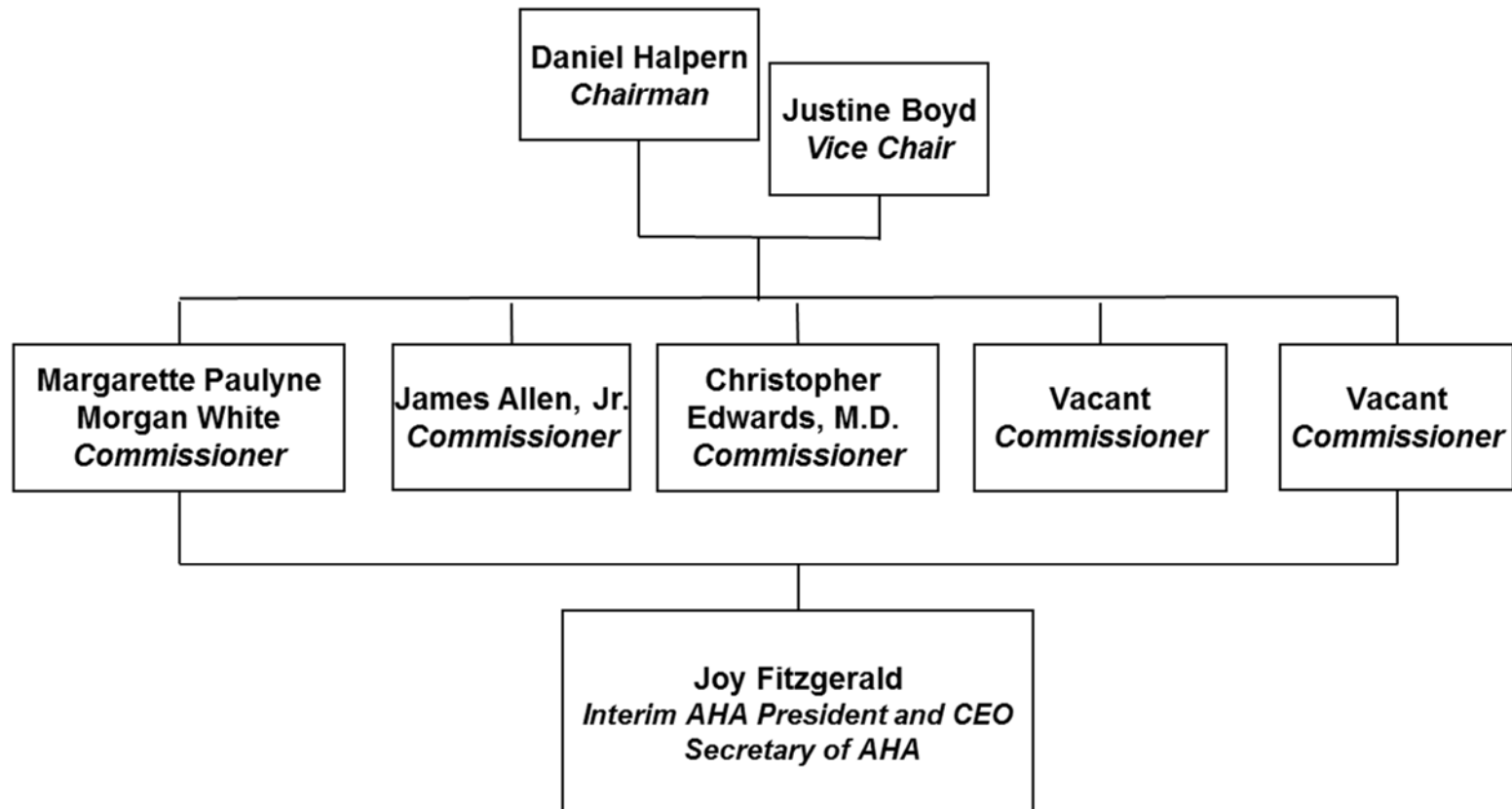
Provide quality affordable housing in amenity-rich, mixed-income communities for the betterment of the community



VISION STATEMENT

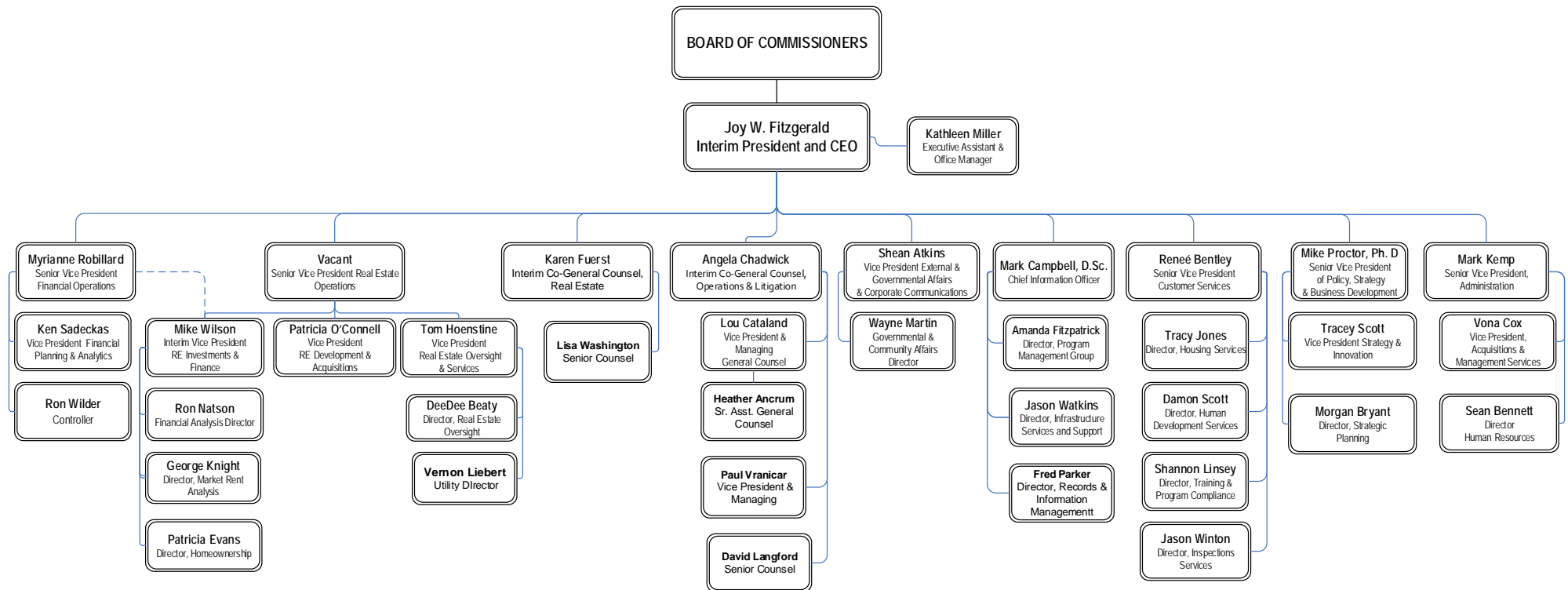
Healthy Mixed-Income Communities; Healthy Self-Sufficient Families

AHA's Board of Commissioners



As of June 2015

AHA's Organization



As of June 2015

BUDGET OVERVIEW

AHA's Moving to Work (MTW) Agreement Renewal and Five-Year Plan

Under an agreement negotiated and executed between The Atlanta Housing Authority (AHA) and The U.S. Department of Housing and Urban Development (HUD), AHA was granted the MTW status until June 30, 2018, at which time the Agreement may be automatically extended for additional ten-year periods, subject to HUD's approval and AHA meeting certain agreed-upon conditions.

In light of recent MTW Agreement renewal requirements announced by HUD, the FY 2016 Budget has been developed to support a five-year plan that will allow AHA to meet HUD's conditions, as they are currently understood, for the renewal of the MTW Agreement.

AHA's FY 2016 Moving to Work (MTW) Implementation Plan

AHA's FY 2016 Budget ("FY 2016 Budget" or "Budget") has been developed in conjunction with and as a part of our FY 2016 MTW Implementation Plan ("FY 2016 MTW Plan").

The FY 2016 MTW Plan was approved by AHA's Board of Commissioners and was submitted to the U.S. Department of Housing and Urban Development (HUD) in April 2015. The Budget must be approved by the Board and submitted to HUD by June 30, 2015.

AHA's FY 2016 Priorities

The FY 2016 Budget encompasses sources and uses of funds that support AHA's four (4) priorities and underlying activities established in the FY 2016 MTW Plan, which align with MTW statutory goals. Those priorities are highlighted below.

Priority 1: Housing Opportunities & Real Estate Development

FY 2016 FOCUS: Expand and preserve housing opportunities while facilitating development of new mixed-income communities.

AHA will continue to expand housing opportunities using its various real estate initiatives, public/private partnerships and resources, and MTW flexibility to increase households served. In addition to its continued investments in its 16 master-planned mixed-use, mixed-income communities and consistent with its previous conversion (reformulation) of subsidy at Centennial Place – the first of its master-planned, mixed-use, mixed-income communities – AHA will continue to explore the conversion of HUD-funded public housing subsidy to a Section 8-based funding platform via the use of AHA's MTW-based Project Based Rental Assistance (PBRA) program or otherwise, including HUD's Rental Assistance Demonstration (RAD) option.

In the eleven senior high-rises and two family properties owned by AHA, new property managers/ developers (PMDs) have been contracted. The PMDs are exploring approaches to finance the rehabilitation of those properties, including potential conversion of HUD-funded public housing subsidy under HUD's RAD program. AHA will also continue to use its PBRA program to incent private-sector developers and owners to develop or

rehabilitate quality rental communities that include affordable units.

Using PBRA and tenant-based Housing Choice vouchers, AHA will continue expanding its supportive housing program combining affordable housing with intensive support services for at-risk populations. AHA will continue to use its Housing Choice tenant-based voucher program to facilitate housing opportunities in economically integrated neighborhoods.

To facilitate this priority, AHA's FY 2016 Budget supports the following initiatives:

- a. Advance the master plans for mixed-use, mixed-income communities.
- b. Advance longer-term real estate development strategy.
- c. Increase voucher utilization using project-based and tenant-based voucher programs.
- d. Expand supportive housing and homelessness initiatives.
- e. Implement the conversion (reformulation) demonstration for Centennial Place.
- f. Preserve and maintain AHA-Owned Residential Communities.

Priority 2: Human Development Services and Self-Sufficiency Initiatives

FY 2016 FOCUS: Increase the number of Housing Choice households that are compliant with AHA's Work/Program

Requirement through enhanced services coordination, contract service providers, and expanded partnerships.

Over the last 20 years, AHA has successfully deconcentrated poverty through relocation of families from public housing sites primarily by using Housing Choice vouchers. While many families are making progress, many families are struggling to maintain their assistance and to move toward self-sufficiency. AHA understands to be successful in mainstream America, long-term, outcome-based human development services for the entire family must be sustained until the desired outcomes are achieved.

Over the last 12 years, AHA has used its MTW flexibility to design and implement innovative strategies that facilitate family self-sufficiency. AHA's policies have contributed significantly to improved outcomes for families. As the environment changed, a greater need emerged to identify strategies that would further advance the well-being of families assisted by AHA now and in the future. Therefore, AHA's human development services focus on its strategic role in breaking the cycle of intergenerational poverty through cradle-to-college education strategies and workforce development initiatives as well as assisting elderly and disabled residents to lead active and healthy lives.

To facilitate this priority, AHA's FY 2016 Budget supports the following initiatives:

- a. Increase work/program participation by Housing Choice families.
- b. Promote Aging Well strategy.
- c. Expand education partnerships.

Priority 3: Administration

FY 2016 FOCUS: Optimize systems investments and identify efficiencies and cost savings throughout the agency.

As an MTW agency, AHA's financial management practices enable investment opportunities to use its MTW Single Fund dollars for both traditional affordable housing programs and innovative programs that strengthen external and community partnerships in support of neighborhood stabilization efforts in and around the city of Atlanta. In FY 2015, AHA completed a multi-year business transformation effort that included deployment of new processing and accounting systems, process improvements, organizational refinements and increased employee engagement. In FY 2016, AHA will continue to evolve and implement measures to reduce administration costs while continuing to provide assistance to families.

To facilitate this priority, AHA's FY 2016 Budget supports the following initiatives:

- a. Continue Cash Management strategy to optimize receipt and use of Federal funds while identifying other sources of revenue.
- b. Optimize technology performance.
- c. Continue to explore efficiencies and cost saving measures.

Priority 4: Choice Neighborhoods Project (subject to award)

During FY 2015, in response to HUD's 2014 Choice Neighborhoods Implementation Grant Notice of Funding Availability (NOFA), AHA and the City of Atlanta jointly submitted a Choice Neighborhoods Implementation Grant application.

The comprehensive plan submitted with the application in response to the NOFA includes the following strategies:

- a. Housing Strategy
- b. Neighborhood Strategy: Critical Community Improvements
- c. People Strategy

The FY 2016 Budget, as presented herein, does not include any sources or uses of funds associated with the Choice Neighborhoods Implementation Grant as the award is uncertain. In the event AHA is awarded the Grant, to be announced in or about September 2015, the FY 2016 Budget would be amended and re-submitted to the Board for approval with the grant acceptance.

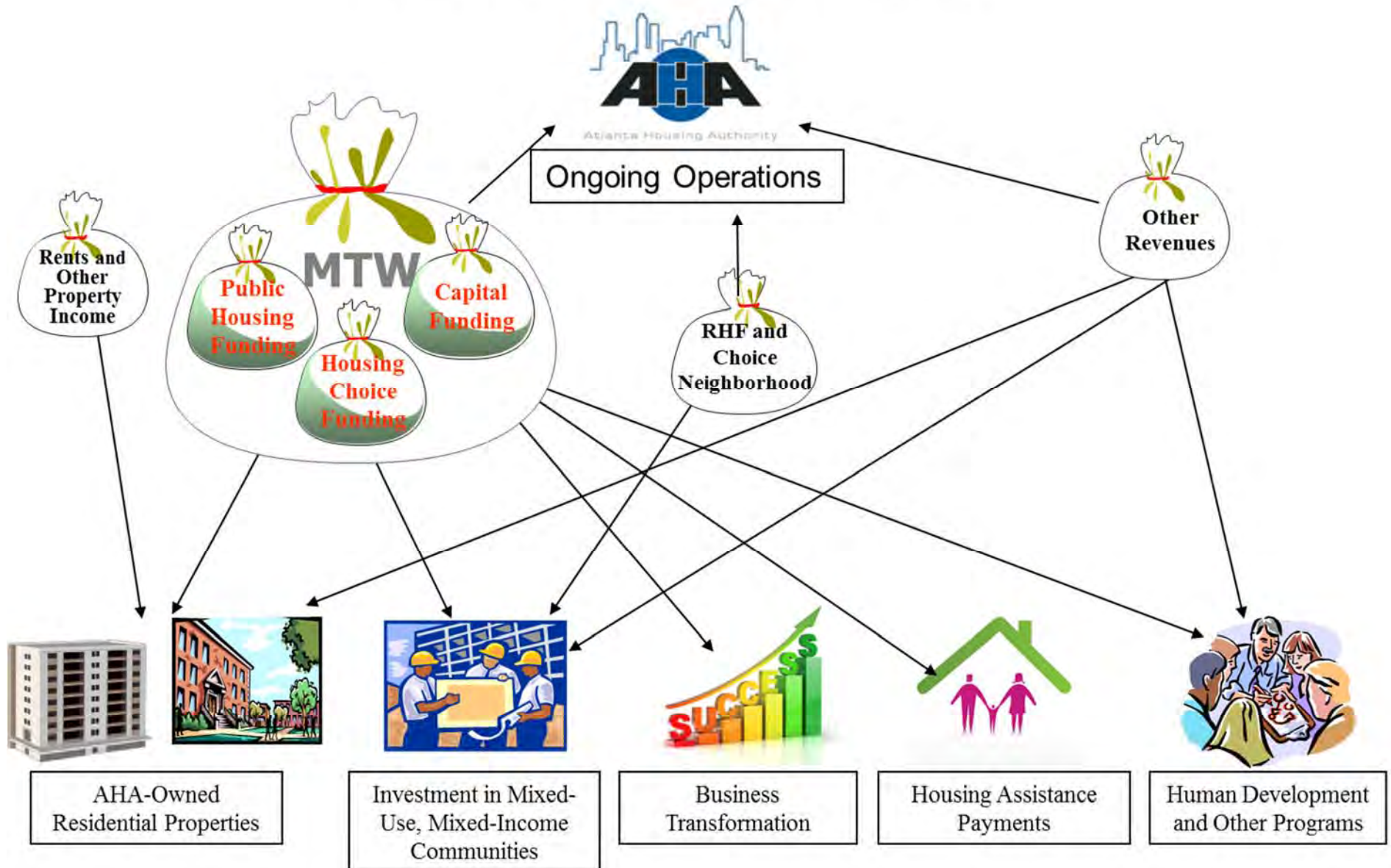
Executive Guidance for the FY 2016 Budget

In addition to the priorities summarized in the previous section, the Interim President and CEO provided the following executive guidance for the development of the FY 2016 Budget:

- AHA will continue to optimize its use of federal funds by increasing the number of families served while reducing corporate expenses.
- AHA's departments should seek expense reduction of at least 10% from FY 2015 Budget or Forecast unless expenses are required to support the increase in families served.
- Budgets will be developed based only on commitments carried over from FY 2015 and new FY 2016 commitments approved by the Interim President and CEO.
- Budgets should be as realistic as possible and should include only items that have a high probability of being accomplished in FY 2016.
- Budgets for AHA-owned residential communities and AHA Headquarters building should continue to reflect cost savings.
- Professional services should be evaluated to determine if they can be handled internally, reduced or eliminated.
- No new hires, including the filling of vacant positions, will be included in the Budget without the approval of the Interim President and CEO.

Please refer to the FY 2016 MTW Plan for additional information on FY 2016 planned initiatives. The sources of funds to support AHA's four (4) priorities and associated expenditures are provided in the "Sources of Funds Assumptions" and "Uses of Funds Assumptions" sections of this narrative. A flowchart illustrating the Sources and Uses of Funds is provided on the next page.

Sources and Uses of Funds



BUDGET PRESENTATION

The FY 2016 Comprehensive Budget (also referred to as “FY 2016 Budget” or “Budget”) is presented in a “Sources and Uses of Funds” format. Certain non-cash items such as depreciation and amortization are not included in this presentation. As a result, the financial information presented in this Budget is not intended to comply with Generally Accepted Accounting Principles.

The following sections should be read in conjunction with the FY 2016 Comprehensive Budget Financial Schedules following this budget analysis.

In order to provide meaningful comparisons to the FY 2016 Budget, figures for the FY 2015 Board Approved Budget (“FY 2015 Budget”) and FY 2015 Annual Forecast (based on March 2015 Year-To-Date Actuals) (“FY 2015 Forecast”) are included in the majority of the FY 2016 Budget Financial Schedules.

The FY 2016 Budget does not include any sources and uses of funds associated with the 2014 Choice Neighborhoods Implementation Grant, for which AHA and the City of Atlanta jointly applied in February 2015. An amended FY 2016 Budget will be presented to the Board for approval with the grant acceptance upon announcement of the awardees, which is expected in or about September 2015.

BUDGET FINANCIAL HIGHLIGHTS

Below is a summary of the major components of AHA’s FY 2016 Budget supporting AHA’s priorities and initiatives.

- Total sources of funds of \$243.5 million, of which \$8.6 million from funds accumulated from prior years and \$18.0 million of excess sources to be held at HUD for AHA’s future MTW-eligible uses.
- Total spending of \$224.6 million, a \$13.5 million increase over FY 2015 projected spending, driven primarily by a \$6.9 million increase in Housing Assistance and Operating Subsidy Payments and a \$10.0 million increase in Development and Revitalization, which are partially offset by \$3.4 million cost reductions primarily in Corporate and AHA-owned properties operating and capital expenditures.
- Major spending components of the Budget include:
 - \$146.8 million for **Housing Assistance and Operating Subsidy Payments**, a \$6.9 million increase over the FY 2015 Forecast due to an increase in Housing Choice voucher lease-ups and new AHA-assisted PBRA units.
 - \$22.3 million for **Development and Revitalization**, a \$10.0 million increase over the FY 2015 Forecast, primarily from increased spending at AHA master-planned properties and RAD conversions.
 - \$20.1 million for **Corporate Support**, a \$1.3 million cost reduction from the FY 2015 Forecast and a \$4.0 million reduction from the FY 2015 Budget.
 - \$17.3 million for **Operating Expense for AHA-Owned Residential Communities & Other AHA Properties**, a \$1.1 million decrease from the FY 2015 Forecast.
 - \$13.6 million for **Operating Divisions**, a \$0.8 million increase over FY 2015 forecasted expense.

SOURCES OF FUNDS ASSUMPTIONS

AHA projects sources of funds totaling \$243.5 million, of which \$235.0 million are current year funds from HUD and other external sources and \$8.5 million are funds accumulated in prior years. Of the total FY 2016 budgeted current year sources of funds, AHA projects it will not draw \$18.0 million of the Housing Choice Voucher Program authorized funds, which will be held at HUD and available for AHA's future MTW-eligible uses.

CURRENT YEAR SOURCES OF FUNDS

In FY 2016, AHA projects \$235.0 million in funds from HUD and other external sources, basically at the same level as the FY 2015 Budget. The details behind each of the fund components are explained in the following sections.

Moving to Work (MTW) Single Fund

Under AHA's MTW Agreement, AHA administers its funding for the Housing Choice Voucher Program (HCVP), Public Housing Operating Subsidy (Operating Subsidy) and Capital Fund Program (CFP) as a single fund (MTW Single Fund) in a substantially less-regulated environment with increased programmatic flexibility. Notwithstanding this increased flexibility, there remains ongoing program-specific budgeting, accounting and reporting responsibilities to HUD. AHA will continue to receive funds from these three program areas in

accordance with HUD's annual appropriations process.

Fiscal Years, the Congressional Appropriations Process and HUD Funding (See chart below)

HUD's HCVP, Operating Subsidy and CFP are funded through the annual federal appropriations process. On December 16, 2014, the President signed the Consolidated and Further Continuing Appropriations Act, 2015 (2015 Appropriations Act), which includes the funds HUD is providing to public housing authorities for calendar year 2015, which is HUD's Funding Year (HFY) 2015.

AHA's fiscal year begins July 1 and ends June 30. The AHA FY 2016 Budget, therefore, includes six months (July–December 2015) that will be funded based on HFY 2015. Based on the provisions of the 2015 Appropriations Act, HUD has established HCVP and CFP funding levels for public housing agencies for calendar year 2015. HUD has established preliminary Operating Subsidy funding levels for calendar year 2015 pending completion of its review of the requirements submitted by the nation's public housing agencies.

The last six months of AHA's FY 2016 Budget (January–June 2016) will be based on HFY 2016 funding. Although the Congressional Federal Fiscal Year (FFY) 2016 appropriations process has just begun, the initial HUD appropriation bill introduced in the House supports approximately the same funding levels for AHA programs in FFY 2016 as in FFY 2015.

Comparison of AHA's Fiscal Year to the Federal Fiscal Year and HUD's Funding Year																							
Calendar Year 2015												Calendar Year 2016											
Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Oct 2014 <- Federal Fiscal Year (FFY) 2015									Federal Fiscal Year (FFY)2016											FFY 2017 ->			
HUD Funding Year (HFY) 2015												HUD Funding Year (HFY) 2016											
<- AHA Fiscal Year (FY) 2015						AHA Fiscal Year (FY) 2016												AHA Fiscal Year (FY) 2017 ->					

AHA's FY 2016 Budget is based, therefore, on HFY 2015 funding levels on the assumption that these levels will be repeated for HFY 2016.

HUD Proration Factors and Offset

HUD funds a public housing authority (PHA) based on its determination of the PHA's authorization using calculations unique to each HUD program. HUD compares the total authorizations for all PHAs with the funds provided by Congress for each program. HUD then applies a reduction factor, known as proration, to each PHA's authorization to determine the actual level of funding. For example, a 90% proration would provide only 90% of authorized funding to a PHA.

The 2015 Appropriations Act did not fund HUD programs to the levels requested by HUD. While the HCVP was overfunded, resulting in a 101.25% proration, the Operating Subsidy is expected at approximately 85% proration. Capital Funds are not prorated but are allocated based on the amount of Congressional funding for those programs.

The AHA FY 2016 Budget assumes that the 2016 HCVP proration level will be 100%, the Operating Subsidy proration level will be 85% and CFP funding will approximate the 2015 grant.

HUD has announced that, in order to meet US Department of the Treasury rules, it is planning to reduce the disbursement of cash to public housing agencies starting with the fourth quarter of calendar year 2015 in order to reduce the amount of cash reserves associated with HCVP funds held locally by the PHAs. Although HUD has recognized that a certain level of cash reserve is necessary by the agencies to meet operating cash flow

requirements, it has yet to provide guidance as to the level of HCVP cash reserve balance the agencies will be allowed to hold locally. However, HUD's proposed new disbursement process will not reduce the total amount of HCVP funds allocated to the agencies, but will shift the cash reserve from local funds to HUD-held funds. This "transfer" of cash, therefore, does not have any impact on FY 2016 HCVP funding included in the Budget as sources of funds.

HUD's Rental Assistance Demonstration (RAD) Program

During FY 2016, AHA plans to begin the conversion of its portfolio of AHA-owned communities and AHA-sponsored mixed-income, mixed-finance units from Public Housing funding (Section 9) to HCVP funding (Section 8) under HUD's Rental Assistance Demonstration (RAD) Program. RAD allows public housing agencies to leverage public and private debt and equity in order to reinvest in the public housing stock. Following approval by HUD, AHA and its partners will finalize revitalization plans, identify equity, and convert the properties from public housing units to AHA-PBRA units. HUD will change the funding for the converted properties effective January 1st of the year following the financial closing. Because of the uncertainty of the timing of HUD approval and related activities, AHA expects to receive Operating Subsidy for all current Public Housing units throughout FY 2016. Please refer to the Uses of Funds Assumptions – Development and Revitalization section for more information on communities projected to convert to RAD in FY 2016.

MTW Single Fund

AHA's projections of FY 2016 MTW funding from its three funding sources totaling \$220.6 million are as follows.

Housing Choice Voucher Program (HCVP) Funds

AHA's FY 2016 Budget includes \$202.2 million in HCVP funds, corresponding to the full authorized funding, a \$2.0 million increase over the FY 2015 Budget, primarily due to the higher proration for half of FY 2016, which was not anticipated at the time the FY 2015 Budget was prepared, and additional funding of VASH vouchers, which is based on assistance payments made by AHA. The \$202.2 million HCVP funds are comprised of \$192.9 million in funding for 19,069 MTW-qualified vouchers (MTW HCVP) and \$9.3 million for non-MTW special-purpose vouchers.

While AHA receives most of its HCVP funds as part of its MTW Single Fund, it also receives separate funds for 735 non-MTW special-purpose vouchers. These non-MTW special-purpose vouchers support the Family Unification Program (300), Veterans Affairs Supportive Housing (VASH) (210), One-Year Mainstream (Near elderly disabled) (175) and Five-Year Mainstream (50). Such vouchers, by virtue of the related appropriations language, will never be eligible for inclusion in AHA's MTW Single Fund and are calculated using HUD's standard formulas. During FY 2016, AHA expects that HUD will provide \$8.8 million for HCVP housing assistance payments for these non-MTW vouchers. Participants using these special-purpose vouchers are managed within AHA's MTW program, but special accommodations apply in accordance with HUD's guidance for each program. In addition to its 210 VASH vouchers, AHA has been awarded 30 new VASH vouchers, to be available in August 2015, which will be included in the FY 2017 Budget as the funding of those vouchers is based on assistance payments, which are not expected to be incurred until late FY 2016.

PHAs earn administrative fees from HUD for each non-MTW voucher under contract. Included in the \$9.3 million is \$0.5 million in administrative fees to be earned during FY 2016 for special-purpose vouchers, subject to a 75% proration based on current HUD estimates. As a result of a recent HUD study on administrative fees, there may be changes in the calculation of fees in HFY 2016, which could affect the last six months of AHA's fiscal year. Because special-purpose voucher administrative fees constitute less than 0.25% of AHA's HCVP funding, no provisions were included in the FY 2016 Budget for such potential changes.

Funding for the administration of MTW vouchers is included in the calculation of HUD's MTW HCVP funding and is not identified separately. However, HUD has announced that it is planning to unbundle the MTW voucher administrative fees from the HCVP funding upon the renewal of MTW agreements in 2019. HUD has yet to formally announce the timing and methodology for unbundling, as well as whether the MTW voucher administrative fees will be subject to a proration similar to non-MTW vouchers (75%), in which case MTW voucher administrative fees could be significantly reduced.

For simplicity of presentation, all non-MTW vouchers and their related revenue and expenses are included as MTW Housing Choice Voucher Program Funds in the Sources and Uses of Funds schedule, although they are managed as special-purpose vouchers and reported to HUD separately.

Public Housing Operating Subsidy (Operating Subsidy)

During FY 2016, AHA projects that HUD will provide \$14.5 million in Operating Subsidy, a \$0.4 million decrease from the FY 2015 Budget, based on 85% proration (89% in the FY 2015 Budget) of funding calculated for 1,953 units at the 13 AHA-owned residential communities and 2,221 AHA-assisted units at 34 mixed-income, mixed-finance (MIMF) communities.

Capital Funds Program (CFP)

HUD establishes CFP budgets at the time of annual grant awards based on characteristics of public-housing-assisted units subsidized by AHA under its Annual Contributions Contract with HUD, as amended. While CFP funds are part of the MTW Single Fund, they are provided to AHA on a reimbursable basis. Any unexpended portion of the grant may be used for future year expenditures during the term and subject to the conditions of the grant award. AHA must expend each annual grant within four years of its award. The FY 2016 Budget projects that AHA will draw and HUD will reimburse \$3.9 million in CFP funds, representing an increase of \$0.2 million over the FY 2015 CFP Budget. The \$3.9 million will completely draw the 2012 CFP award, which is due to be expended by March 2016.

Timing and Amounts of MTW Single Fund Draws

While the use of MTW Single Fund funds is fully fungible, HUD manages the three components separately with unique regulations for each HUD program. Each month, AHA may draw funds from HUD in order to meet AHA's fiscal needs, as well as to satisfy any specific requirements of a funding source. Since some of these requirements are tied to actual expenditures, draws each month, and in total for FY 2016, may not align with the Budget.

It is also probable that AHA will not draw all funds authorized by HUD and included in its FY 2015 Budget prior to June 30, 2015, in order to comply with the regulatory and statutory guidelines of the HUD programs.

Current Year Sources of Funds not Included in the MTW Single Fund

Tenant Dwelling Revenue

AHA projects it will receive \$5.8 million in Tenant Dwelling Revenue from the 13 AHA-owned residential communities during FY 2016. This amount reflects a slight increase over the FY 2015 Budget corresponding to the assumption of a 2% increase in Social Security benefits for the majority of residents. This rental revenue is used to fund operating expenses at those communities.

Rent collected by the Owner Entities from AHA-assisted residents of MIMF communities is not revenue to AHA because AHA does not own nor control these properties. AHA provides operating subsidy to the Owner Entities of these communities for the AHA-assisted units to the extent rent collected from the AHA-assisted residents does not cover the operating cost attributable and related to such units, pursuant to the regulatory and operating agreements or PBRA agreements between the Owner Entities and AHA.

Replacement Housing Factor (RHF) Grants

RHF Grants are used to fund activities under AHA's Revitalization Program. HUD calculates RHF funding based on the characteristics of public-housing-assisted units subsidized by AHA that have been demolished or sold and their replacement

has not otherwise been funded by HUD. Similar to CFP funds, these funds are provided to AHA on a reimbursable basis. Any unexpended portion of the grant may be used for future year expenditures during the term and subject to the conditions of the grant award. During FY 2016, AHA projects that it will use and HUD will reimburse \$6.7 million in RHF funds related to the revitalization of AHA's master-planned communities and the rehabilitation of AHA-owned residential communities and AHA-sponsored communities as part of their RAD conversion to AHA-PBRA communities. Please refer to Schedule VIII.A for details of RHF funding by community/property.

Choice Neighborhoods Implementation Grant (CNIG)

As mentioned previously, during FY 2015 AHA and the City of Atlanta jointly submitted an application to HUD for a 2014 Choice Neighborhoods Implementation Grant. At the time of publication of this Budget, HUD had not yet announced the awardees of the 2014 grant awards, and therefore the CNIG and associated expenses, are not included in the FY 2016 Budget.

National Housing Compliance (NHC)

AHA will continue its fee-based business relationship with Georgia HAP Administrators, Inc., *dba* National Housing Compliance (NHC). AHA, as a member of NHC, earns unrestricted fees generated by performance-based contract administration (PBCA) services conducted by NHC on behalf of HUD. No MTW or other AHA restricted funds support NHC operations. During FY 2016, AHA projects it will receive \$0.6 million in distributions as a NHC member, corresponding to the amount AHA expects to earn based on its FY 2015 Forecast.

Development-related Fees

AHA projects it will close the financial transaction for Centennial Place II in FY 2016 as part of its reformulation demonstration. AHA also projects HUD's approval for the financial closing of Rental Assistance Demonstration (RAD) conversions for Villages of East Lake I & II and Piedmont Road Highrise. AHA expects to earn \$0.4 million in developer and transaction fees at these four financial closings. In addition, AHA projects the receipt of \$0.4 million in asset management fee income related to previously closed deals. Finally, AHA projects \$0.1 million in fees for other development-related activities.

Other Current Year Revenue and Grants

During FY 2016, AHA anticipates it will receive \$0.3 million from various sources including cell tower and other miscellaneous revenue.

Non-Operating Sources of Funds

Due to their uncertainty, sources from the collection of certain receivables or interest thereon, or sale of property are excluded from the FY 2016 Budget.

SOURCES OF FUNDS FROM PRIOR YEAR ACCUMULATIONS

In addition to the uses of funds earned from HUD and other external sources during FY 2016, AHA plans to use funds which it has accumulated or received in prior years. As described below, these funds were accumulated from a variety of sources for specific purposes and may have restrictions on their use. Accordingly, AHA has determined which funds accumulated or

received in prior years are best suited for its FY 2016 Budget uses in order to optimize funds available.

Funds Restricted for Revitalization Activities

AHA, in partnership with its private-sector development partners, will continue to advance its revitalization master plans for sustainable, market-rate quality, mixed-use, mixed-income communities. During FY 2016, AHA anticipates using \$6.4 million in cash that has been accumulated for these purposes. AHA plans to continue to use a combination of RHF grants, MTW funds and Public Improvement funds from the City of Atlanta and its Affiliates to leverage private sources of funds raised by its private-sector development partners to advance the revitalization activities.

Public Improvement Funds Provided by the City of Atlanta and Other City Agencies

The City of Atlanta and its Affiliates have supported AHA's Revitalization Program activities by providing funds for infrastructure and other public improvements in the public right-of-way. These funds typically have come from the sale of special purpose bonds (e.g., Tax Allocation District (TAD) bonds and Water & Sewer bonds). Depending on the source of funding, the City either provides the funds to AHA in advance of construction or as reimbursement for completed construction. During FY 2016, AHA anticipates using \$2.2 million in Public Improvement Funds either provided in advance by the City of Atlanta and its Affiliates or subject to reimbursement by them. Pursuant to agreements with the City, AHA's private-sector development partners execute the public improvement work in order to better coordinate and integrate the construction-related activities.

Drawdown of MTW Funds

In accordance with the terms of AHA's MTW Agreement, HUD has provided AHA funds under the Housing Choice Voucher Program, Public Housing Operating Subsidy and Capital Fund Program each year since 2004, which are combined into AHA's MTW Single Fund. If annual MTW Single Fund revenue exceeds the MTW expenditures, the balance remains available to be used for planned MTW-eligible activities in future years and to supplement future annual HUD MTW funds when proration reduces funding below levels necessary to meet AHA's mission and MTW objectives. The FY 2016 Budget does not anticipate the use of MTW funds accumulated in prior years. However, should Congress or HUD elect to reduce funding during FY 2016 below projected levels, AHA may draw upon MTW funds accumulated in prior years to meet budgeted requirements.

USES OF FUNDS ASSUMPTIONS

AHA projects the use of \$224.6 million to support its FY 2016 Budget, representing a \$13.5 million increase over the FY 2015 Forecast, primarily to support the planned increase in the number of families served in FY 2016.

Housing Assistance and Operating Subsidy Payments (Schedule II)

During FY 2016, AHA projects it will provide Housing Assistance and Operating Subsidy Payments totaling \$146.8 million to various Owner Entities, landlords, tenants and other housing authorities, representing a \$6.9 million increase over the FY 2015 Forecast.

Tenant-Based and Homeownership Vouchers (Schedule II)

The Budget includes \$96.2 million to support AHA's Housing Choice Tenant-Based Voucher Program, a \$4.7 million increase over the FY 2015 Forecast, corresponding primarily to an increase in the number of vouchers leased-up, from 9,200 to 10,221, respectively at fiscal year-end. The total tenant-based and homeownership voucher payment is comprised of the following:

- This Budget anticipates funding a total of 10,221 Housing Choice participant households by the end of FY 2016, a net increase of 1,021 vouchers from the 9,200 vouchers projected to be leased-up by the end of FY 2015. Included in the projected 10,221 vouchers are 8,332 households (\$78.0 million) in AHA's jurisdiction and 1,889 households (\$16.8 million) for whom AHA is responsible, but who reside outside AHA's jurisdiction and have "ported" their voucher to that jurisdiction under HUD's voucher portability policy. In addition, AHA expects to pay \$1.0 million in Voucher Portability Administrative Fees to other public housing authorities to administer these ported vouchers.
- In its FY 2016 MTW Plan, AHA committed to increasing the total number of families served through all programs from 21,730 (projected by end of FY 2015) to 21,780 households by the end of FY 2016. In order to ensure AHA accomplishes this goal and meets its five-year plan, while offsetting an expected attrition of 600 vouchers, AHA intends to issue 1,474 vouchers to eligible households drawn from AHA's Housing Choice waiting list and also absorb 60 additional participants who "port in" to Atlanta from other PHAs.
- AHA will continue the implementation of two programs that began in FY 2015. The Tenant-Based Supportive

Housing program (also known as Flow) will add an additional 42 MTW vouchers for individuals graduating from Shelter-Plus Supportive Housing, to bring the total to 50 by the end of FY 2016. Fifteen (15) additional MTW vouchers will be used to support AHA's KickStart program for young adults transitioning from foster care, to bring the total served to 25 by the end of FY 2016.

- In connection to the VASH program, AHA anticipates to have fully leased the 210 vouchers by the end of FY 2015 and start leasing the new 30 vouchers, to be awarded in August 2015, later in FY 2016.
- Included in the Budget is \$0.6 million for AHA's Housing Stabilization Fund (which is also referred to as the "Home Again" program) designed to provide temporary financial assistance to renters who are not participants in other AHA programs.
- The Budget includes \$0.2 million for Leasing Incentive Fees, which will be used to aid AHA in negotiating rental agreements for selected hard-to-house households, where needed.
- This Budget also supports 38 homeownership vouchers for \$0.2 million, which provide payments to eligible homeowners to assist them in making their monthly mortgage payments.

Project Based Rental Assistance (PBRA) (Schedule II.A)

Under the auspices of AHA's PBRA Program, an Owner Entity agrees with AHA to set aside an agreed percentage of units in its housing community in exchange for long-term PBRA assistance for such units, thereby making such units affordable to eligible low-income households.

The FY 2016 Budget includes \$38.8 million in projected PBRA payments, a \$2.8 million increase over the FY 2015 Forecast, to support 5,058 AHA-assisted households (available units at end of FY 2016) at 69 participating mixed-income and supportive housing communities, including a full year of GE Tower new PBRA units (95), which were added in March 2015, and Oasis at Scholars Landing (60), which is expected to come on line in or about June 2015.

The FY 2016 Budget also includes \$1.5 million for expected new PBRA properties totaling 200 units, which result from responses received during FY 2015 to AHA's RFP, and are expected to come on line at various dates during FY 2016, subject to required approvals. The FY 2016 Budget also reflects a \$0.6 million rent increase contingency assuming an average rate of 1.5%.

Mixed-Income Communities Operating Subsidy for AHA-Assisted Units (Schedule II.B)

Each AHA-sponsored mixed-income, mixed-finance rental community is owned by a public/private partnership. As a part of the development agreement, AHA provides operating subsidy for AHA-assisted units. The Budget includes \$11.9 million in operating subsidy to support 2,221 households at 34 AHA-sponsored mixed-use, mixed-income properties, representing a \$0.6 million decrease from the FY 2015 Forecast primarily due to the full benefit of the change in funding methodology implemented in 2014. Included in the FY 2016 Budget are operating and capital reserve contingencies totaling \$0.8 million to support potential "true-ups" and rent increases.

Operating Divisions Expense (Schedule III)

The Budget includes \$13.6 million for AHA's Operating Divisions, a \$0.8 million or 6.2% increase over the FY 2015 Forecast, primarily due to vacancies in the Office of the Chief Real Estate Officer and required support from the Customer Services Group – Housing and Inspections Services for the projected increase in voucher lease-up activities during FY 2016. The Operating Divisions include:

- The **Customer Services Group (CSG)**, with a FY 2016 Budget of \$8.5 million, a \$0.2 million increase over the FY 2015 Forecast, manages the various components of AHA's Tenant-Based Voucher program and includes the departments of Customer Services (Group Administration), Housing Services, Inspections Services and Human Development Services. This group is responsible for comprehensive service delivery as well as monitoring the work compliance program for all AHA's Housing Choice participants. This group is a one-stop shop where clients' needs will be assessed and services effectively delivered through strategic partnership with highly skilled service providers.
- The **Real Estate Group (REG)**, with a FY 2016 Budget of \$5.1 million, an increase of \$0.5 million over the FY 2015 Forecast due to previously mentioned vacancies and increased activities with RAD conversions and financial closings. REG includes three main functions in addition to the Office of the Chief Real Estate Officer:
 - **Real Estate Development** manages AHA's development, acquisition and revitalization activities.

- **Real Estate Oversight & Services** provides property management oversight for AHA-owned residential communities, AHA-assisted units at MIMF communities and AHA's portfolio of PBRA communities.
- **Real Estate Investments & Finance** manages AHA's Homeownership Program, provides asset and financial management for mixed-income communities and AHA's portfolio of PBRA communities as well as market and financial analysis support to the Real Estate Group and other AHA departments.

Corporate Support Expense (Schedule IV)

The Budget provides \$20.1 million for Corporate Support Expense, a \$1.3 million decrease from the FY 2015 Forecast and a \$4.0 million or 16.6 % decrease from the FY 2015 Budget, primarily due to cost reductions resulting from decreases in headcount and temporary services, consulting & professional services, and various administration expenses as well as the completion of the ERP program. Corporate Support includes the following departments:

- **Executive Office** provides strategic leadership and enterprise-wide guidance.
- **Office of General Counsel** provides legal support through in-house counsel and external legal services.
- **Finance** provides financial leadership and services including accounting, treasury, budgeting and forecasting, external and internal financial reporting in compliance with various regulatory requirements, tax reporting as well as internal control oversight and guidance.
- **Information Technology (IT)** leads the technology strategy for AHA including the design, implementation, optimization

and management of the systems, including the ERP, required to support AHA's operations. This department also provides day-to-day IT support to the enterprise including AHA-owned residential communities, as well as system and data security. IT also provides supervision to the Records & Information Management and Enterprise Program Management Office departments, which are further described below.

- **Records & Information Management** leads the enterprise-wide document management capability and the centralized management of AHA's records and provide shared services to all AHA departments, with the ultimate goal of substantially reducing the use of paper and storage cost. This group supports the life-cycle management of AHA's physical and electronic documents/records and also provides printing, copying and other administrative services.
- **Enterprise Program Management Office** provides best practice project management services and tools for the enterprise and facilitates communication, decision-making and alignment with strategic objectives to ensure projects are completed on time and within budget. This department is organized for scalability with a lean core team which can staff-up depending of project activity level.
- **Office of Policy & Strategy** leads the development and oversight of corporate policies and the standardization of procedures, leads strategic planning, and drives strategic goal setting and tracking at the enterprise level. This department is accountable for the acquisition of public and private funding sources that support AHA's strategic priorities.

- **External & Governmental Affairs & Corporate Communications** cultivates and manages AHA's relationships with local government and community stakeholders. The department promotes and maintains the enterprise standard for all communications, and develops and executes AHA's enterprise-wide communications strategy which includes the company's internet, intranet and various media for AHA constituents.
- **Corporate Administrative Support** provides supervision to Acquisition & Management Services and Human Resources Operations, which are described below. It also has the responsibility for enterprise-wide risk management and insurance as well as manages special administrative projects.
 - **Acquisition & Management Services** leads AHA's contracting and procurement function. This department is also responsible for AHA's diversity, labor and other regulatory compliance tracking and reporting (i.e. Minority and Women Business Enterprises statistics, Davis-Bacon, e-Verify).
 - **Human Resources Operations** leads the people strategy for the enterprise including the organization design, recruitment, talent management, training and professional development. This department also manages payroll, employee benefits and pension plans.
- **Activities Managed by Human Resources** is limited in FY 2016 to Severance and Related Expense and Defined Benefit Pension Plan Contribution as the other activities, presented separately in FY 2015, have either been included in the Corporate Administration Support, Human Resources or respective departments where applicable.

AHA's Employee Compensation

The FY 2016 Budget includes salaries and benefits for 256 permanent and temporary employees up from 250 in the FY 2015 Budget, primarily due to new positions or the conversion of contractual to either temporary or permanent positions to support the increase in voucher lease-up activities planned for FY 2016.

The Budget assumes a merit increase totaling \$0.5 million, effective September 1, 2015, at 2.5% for employees receiving a performance review rating of meeting expectations and 3.5% for employees receiving an exceptional rating. See also section "Employee Compensation Special Funding Restrictions" below for funding restrictions.

The Budget also provides for employer-paid benefits at the same employee/employer ratio as in FY 2015 and a projected 10% increase in major health care plan costs during the last six months of FY 2016.

Employee Compensation Special Funding Restrictions

The 2015 Appropriations Act restricts the use of Public Housing Operating Subsidy, Capital Fund Program and Housing Choice Voucher Program funds for the payment of salaries to employees of local housing authorities who earn in excess of \$158,700 annually (2014 - \$157,100). AHA projects that it will pay approximately \$0.6 million during FY 2016 in excess of the Congressional limit in connection with compensation paid during calendar year 2015. In accordance with the guidance from HUD, AHA will continue to pay the excess compensation from eligible non-federal sources.

Human Development Support and Community Relations (Schedule V)

AHA projects total spending of \$1.5 million, a \$0.3 million increase over the FY 2015 Forecast, for programs and activities that facilitate access to Human Development services for AHA-assisted households, in order for Housing Choice families that are not compliant with AHA's work compliance program to achieve self-sufficiency. These services are in addition to those provided directly by private management and development companies at AHA-owned residential communities and AHA's Customer Services Group - Human Development Services department.

The FY 2016 Human Development Support includes \$1.1 million for the provision of intensive case management for families with complex needs, the Good Neighbor training program, Aging Well programs for seniors, supportive services and activities for youth which are primarily provided through contracted service providers.

Operating Expense for AHA-Owned Residential Communities and Other AHA Properties (Schedule VI)

AHA projects to spend \$15.0 million to operate AHA-owned residential communities, including human development services at those communities, representing a \$1.1 million decrease from the FY 2015 Forecast, primarily due to lower maintenance and protective services expense.

In addition, the Budget provides for a total of \$2.4 million to operate other AHA properties in Payments in Lieu Of Taxes (PILOT), property maintenance and protective services at AHA Headquarters and other AHA properties, essentially at the same level as the FY 2015 Forecast, as the cost savings resulting from

the change of property management company at AHA Headquarters during FY 2015 are offset by higher PILOT and other AHA land expense.

Preservation of AHA-Owned Residential Communities and AHA Headquarters Capital Expenditures (Schedule VII)

AHA projects that it will spend \$1.0 million in FY 2016, a decrease of \$3.0 million from the FY 2015 Forecast, to make critical and necessary capital improvements to preserve the physical conditions of its AHA-owned residential communities, which are not subject to an imminent RAD conversion.

AHA also projects to spend \$0.3 million on other capital expenditures during FY 2016 for various technology investments to maintain and optimize AHA enterprise-wide operations.

Development and Revitalization (Schedule VIII)

AHA projects that it will spend \$22.3 million in FY 2016, a \$10.0 million increase over the FY 2015 Forecast. The main components of the FY 2016 Budget are as follows:

- Development and revitalization activities for \$18.0 million as AHA and its private-sector development partners continue to advance the master plans for eight AHA-sponsored master-planned, mixed-use, mixed-income communities, including primarily Scholars Landing and West Highlands. Please refer to Schedule VIII.A for additional details by community/property.
- Predevelopment and development loans for the conversion of selected AHA-owned and AHA-supported units at mixed-income communities to AHA-PBRA units under HUD's

RAD program for \$2.8 million. These communities include Cheshire Bridge Highrise, Cosby Spear Highrise, Juniper and 10th Highrise, Piedmont Road Highrise and Villages at East Lake I & II. Financial closings are projected for Piedmont Road Highrise and Villages at East Lake I & II in the later part of FY 2016. Please refer to Schedule VIII.A.1 for additional details by community.

- Exploration of opportunities for the development of other AHA-owned properties and homeownership down payment program for \$1.5 million. More specifically, during FY 2016, AHA projects to complete its comprehensive real estate strategy in order to establish priorities for its real estate development. Please refer to Schedule VIII.A.2 for additional details by property.

In order to execute its FY 2016 development and revitalization plan, AHA projects the use of RHF grants for \$6.7 million, public improvements funds provided by the City of Atlanta and other City Agencies for \$2.2 million and MTW funds for \$7.0 million as well as funds restricted for revitalization activities accumulated in prior years for \$6.4 million. As mentioned previously, pursuant to its cash management policy, AHA optimizes the use of available funds by taking into consideration statutory and regulatory restrictions and deadlines.

ERP Solution (Schedule IX)

With the stabilization of the ERP and expected completion of the Business Transformation in FY 2015, budgeted FY 2016 expenses associated with the remaining optimization of the ERP (Yardi) and operation processes have been included in the Information Technology and respective AHA's departments where applicable. Please refer to Schedule IX.A for a final report

on the ERP Program Spending and financial performance against the June 2012 Board Approved Budget.

Debt Service on Energy Performance Contract (EPC) Capital Lease (Sources and Uses of Funds Schedule)

In FY 2012, AHA entered into an Energy Performance Contract (EPC), which used a \$9.1 million EPC capital lease along with supplemental MTW funds to further implement energy conservation and efficiency solutions at the AHA-owned residential communities. These improvements were substantially completed in FY 2014. The FY 2016 normal debt service for the EPC capital lease is expected to amount to \$0.7 million. In addition, AHA projects to make an EPC capital lease reimbursement of \$1.0 million in connection with the RAD conversion of Piedmont Road Highrise. HUD's EPC program provides for continued HUD subsidy funding at the utility consumption rates existing prior to the improvements. Utility savings realized from these improvements, therefore, cover the debt service.

RECLASSIFICATIONS WITHIN THE FY 2016 BUDGET

The FY 2016 Budget Resolution authorizes AHA to reallocate between funding sources, business lines, departments and accounts, as necessary, to execute the FY 2016 Annual MTW Plan as long as AHA remains within the FY 2016 Budget spending (uses) authority approved by the Board of Commissioners.

ACTUAL TO BUDGET REPORTING

At least quarterly, AHA will provide reports to the Board of Commissioners of actual sources and uses of funds against the FY 2016 Budget and explain significant variances.

BUDGET RISKS

The FY 2016 Budget is based on a number of assumptions, which have been addressed earlier in this document. Should these assumptions not occur as described, there will be impacts on the ability of AHA to execute this budget. The significant assumptions and the related risks are as follows:

- AHA's funding from HUD is based on the assumption that Congress will fund FFY 2016 essentially at the same levels as for FFY 2015. Should Congress elect to reduce funding levels, the Excess funds which are forecasted to be held at HUD would be reduced accordingly.
- The Budget forecasts an excess of sources over uses of \$18.0 million which will be held at HUD and be available for AHA future uses. This assumes HUD will execute its current plan to reduce the levels of PHA-held funds and hold the authorized funds at HUD, and remain designated for AHA.
- The Budget was developed on the assumption that the economy of Atlanta will remain relatively stable in the next 12-18 months. Changes in the economy affect both the availability and affordability of housing. The Budget assumes AHA will be able to lease-up over 1,500 new tenant-based Housing Choice voucher participants in FY 2016 before attrition. This requires the level of qualified

units exist at affordable rates that are acceptable to the participants. If such a level of affordable housing does not exist, AHA may not be able to lease-up and meet the budgeted HAP levels.

- The economy may also have an impact on AHA's Development and Revitalization program as demand for construction assets may be affected and the availability of suitable homebuyer opportunities change.
- The Budget assumes that AHA will be able to negotiate and contract with new Owner-entities for an additional 200 PBRA units for an average of ten months in FY 2016. Should AHA not enter into these contracts as projected, AHA may not meet its budget for PBRA expenses.
- The Budget also assumes that AHA partners will be able to obtain financing for the conversion of several AHA-owned communities and AHA-supported units at mixed income properties; and that HUD will grant approval for the properties to convert under the RAD program. If these financings and related agreements do not occur, including delays in obtaining HUD's approval, AHA may not meet its budget for RAD conversion.



The Housing Authority of the City of Atlanta

**Comprehensive Budget
Financial Schedules**

**For the Fiscal Year
Beginning July 1, 2015 and Ending June 30, 2016**

Approved by AHA's Board of Commissioners at the June 16, 2015 Meeting

The Housing Authority of the City of Atlanta, Georgia

Sources and Uses of Funds

FY2016 Budget

(Excludes Non-cash Items)

Schedule		FY 2016 Budget	FY 2015 Budget	FY 2016 B Over (Under) FY 2015 B	FY 2015 Forecast	FY 2016 B Over (Under) FY 2015 F
	Sources of Funds					
	Current Year Sources of Funds *					
	Housing Choice Voucher Program Funds	\$ 202,159,540	\$ 200,137,526	\$ 2,022,014	\$ 200,137,526	\$ 2,022,014
	Public Housing Operating Subsidy	14,516,440	14,960,730	(444,290)	19,867,630	(5,351,190)
	Capital Funds Program (CFP)	3,921,890	3,690,380	231,510	3,690,380	231,510
	Total MTW Single Fund	220,597,870	218,788,636	1,809,234	223,695,536	(3,097,666)
	Tenant Dwelling Revenue	5,828,230	5,691,019	137,211	5,857,323	(29,093)
	Replacement Housing Factor (RHF) Grants	6,714,635	7,397,034	(682,399)	5,593,494	1,121,141
	Choice Neighborhoods Implementation Grant**	-	1,705,299	(1,705,299)	-	-
	National Housing Compliance (NHC)	630,900	500,000	130,900	630,843	57
	Development-related Fees	904,551	820,814	83,737	820,814	83,737
	Other Current Year Revenue and Grants	292,305	205,425	86,881	1,259,784	(967,479)
	Non-Operating Sources of Funds	-	-	-	412,038	(412,038)
	Total Current Year Sources of Funds	234,968,492	235,108,227	(139,735)	238,269,832	(3,301,340)
	Sources of Funds from Prior year Accumulations*					
	Drawdown of Funds Restricted for Revitalization Activities	6,400,190	6,915,058	(514,868)	2,694,458	3,705,732
	Drawdown of Prior Year NHC Funds for Non-MTW Activities	-	268,114	(268,114)	420,000	(420,000)
	Public Improvement Funds Provided by the City of Atlanta and Other City Agencies	2,154,515	555,000	1,599,515	56,368	2,098,147
	Total Sources of Funds from Prior Year Accumulations	8,554,705	7,738,172	816,533	3,170,826	5,383,879
I	Total Sources of Funds	\$ 243,523,197	\$ 242,846,399	\$ 676,798	\$ 241,440,658	\$ 2,082,539

* Current Year Sources of Funds refers to funds which AHA receives or is entitled to receive, in the case of Housing Choice Voucher Program Funds, from HUD and external sources during the current fiscal year. Sources of Funds from Prior Year Accumulations include the use of non-MTW funds cash balances available to AHA at the beginning of the fiscal year.

** The FY 2016 Budget does not include any sources and uses of funds associated with the 2014 Choice Neighborhoods Implementation Grant, for which AHA and the City of Atlanta jointly applied in February 2015, pending awardee announcement by HUD expected in or about September 2015.

This schedule is continued on the following page.

Sources and Uses of Funds

FY2016 Budget

(Excludes Non-cash Items)

Continued from previous page

Schedule		FY2016 Budget Request	FY 2015 Budget	FY 2016 B Over (Under) FY 2015 B	FY 2015 Forecast	FY 2016 B Over (Under) FY 2015 F
	Uses of Funds					
	Housing Assistance and Operating Subsidy Payments					
	Tenant-Based and Homeownership Vouchers	\$ 96,169,624	\$ 98,012,886	\$ (1,843,262)	\$ 91,503,959	\$ 4,665,665
	Project Based Rental Assistance (PBRA)	38,793,354	36,421,291	2,372,063	35,995,531	2,797,823
	Mixed-Income Communities Operating Subsidy for AHA-Assisted Units	11,858,230	12,856,947	(998,717)	12,456,393	(598,163)
II	Total Housing Assistance and Operating Subsidy Payments	146,821,208	147,291,124	(469,916)	139,955,883	6,865,325
III	Operating Divisions	13,637,001	12,734,697	902,304	12,875,694	761,307
IV	Corporate Support	20,070,291	22,973,053	(2,902,762)	20,580,950	(510,659)
V	Human Development Support and Community Relations	1,514,412	2,816,432	(1,302,020)	1,217,617	296,795
VI	Operating Expense for AHA-Owned Residential Communities & Other AHA Properties	17,280,994	18,336,022	(1,055,028)	18,405,053	(1,124,059)
VII	Capital Expenditures for Preservation of AHA-Owned Residential Communities & AHA Headquarters	1,283,080	4,914,000	(3,630,920)	4,321,759	(3,038,679)
VIII	Development and Revitalization	22,307,899	31,254,346	(8,946,447)	12,283,130	10,024,769
IX	ERP Solution	-	1,059,400	(1,059,400)	763,120	(763,120)
	Debt Service on Energy Performance Contract (EPC) Capital Lease	1,658,510	646,510	1,012,000	646,510	1,012,000
	Total Operating Expenses	77,752,187	94,734,460	(16,982,273)	71,093,833	6,658,354
	Total Uses of Funds	224,573,395	242,025,584	(17,452,189)	211,049,716	13,523,679
	Excess of Sources over Uses of Funds*	\$ 18,949,802	\$ 820,815	\$ 18,128,987	\$ 30,390,942	\$ (11,441,140)
* The Excess of Funds above are available for future uses and to be held as follows:						
	Housing Choice Voucher Program Funds held at HUD	\$ 18,045,251	\$ -	\$ 18,045,251	\$ 29,264,097	\$ (11,218,846)
	Development-Related Funds held at AHA	904,551	820,815	83,736	1,126,845	(222,294)
	Excess of Sources over Uses of Funds	\$ 18,949,802	\$ 820,815	\$ 18,128,987	\$ 30,390,942	\$ (11,441,140)

Schedule I
Sources & Uses of Funds by Major Activities and Programs
FY2016 Budget

	MTW Program	Housing Compliance (NHC)	Revitalization Program	FY 2016 Budget
Sources of Funds				
Current Year Sources of Funds				
Housing Choice Voucher Program Funds	\$ 202,159,540	\$ -	\$ -	\$ 202,159,540
Public Housing Operating Subsidy	14,516,440	-	-	14,516,440
Capital Funds Program (CFP)	3,921,890	-	-	3,921,890
Total MTW Single Funds	220,597,870	-	-	220,597,870
Tenant Dwelling Revenue	5,828,230	-	-	5,828,230
Replacement Housing Factor (RHF) Grants	-	-	6,714,635	6,714,635
Choice Neighborhoods Implementation Grant**	-	-	-	-
National Housing Compliance (NHC)	-	630,900	-	630,900
Development-related Fees	-	-	904,551	904,551
Other Current Year Revenue and Grants	292,305	-	-	292,305
Total Current Year Sources of Funds	226,718,406	630,900	7,619,186	234,968,492
Sources of Funds from Prior Year Accumulations				
Drawdown of Funds Restricted for Revitalization Activities	-	-	6,400,190	6,400,190
Public Improvement Funds Provided by the City of Atlanta and Other City Agencies	-	-	2,154,515	2,154,515
Total Sources of Funds from Prior Year Accumulations	-	-	8,554,705	8,554,705
Total Sources of Funds	\$ 226,718,406	\$ 630,900	\$ 16,173,891	\$ 243,523,197
Uses of Funds				
Total Housing Assistance and Operating Subsidy Payments	\$ 146,821,208	\$ -	\$ -	\$ 146,821,208
Operating Divisions	13,583,226	53,775	-	13,637,001
Corporate Support	19,504,866	565,425	-	20,070,291
Human Development Support and Community Relations	1,502,712	11,700	-	1,514,412
Operating Expense for AHA-Owned Residential Communities & Other AHA Properties	17,280,994	-	-	17,280,994
Capital Expenditures for Preservation of AHA-Owned Residential Communities & AHA	1,283,080	-	-	1,283,080
Development and Revitalization	7,038,559	-	15,269,340	22,307,899
Debt Service on Energy Performance Contract (EPC) Capital Lease	1,658,510	-	-	1,658,510
Total Uses of Funds	208,673,155	630,900	15,269,340	224,573,395
Excess of Sources over Uses of Funds*	\$ 18,045,251	\$ -	\$ 904,551	\$ 18,949,802
* The Excess of Funds above are available for future uses and to be held as follows:				
Housing Choice Voucher Funds held at HUD	\$ 18,045,251	\$ -	\$ -	\$ 18,045,251
Development-Related Funds held at AHA	-	-	904,551	904,551
Excess of Sources over Uses of Funds	\$ 18,045,251	\$ -	\$ 904,551	\$ 18,949,802

Schedule II
Housing Assistance and Operating Subsidy Payments
FY2016 Budget

Schedule		FY 2016 Budget	FY 2015 Budget	FY 2016 B Over (Under) FY 2015 B	FY 2015 Forecast	FY 2016 B Over (Under) FY 2015 F
	Tenant-Based and Homeownership Vouchers					
	In Jurisdiction Tenant-Based Vouchers	\$ 77,959,573	\$ 77,015,998	\$ 943,575	\$ 73,155,195	\$ 4,804,378
	Out of Jurisdiction (Port Out) Tenant-Based Vouchers	16,817,330	19,325,210	(2,507,880)	16,994,208	(176,878)
	Voucher Portability Administrative Fees	983,877	1,136,677	(152,800)	964,667	19,210
	Leasing Incentive Fees	160,000	100,000	60,000	120,907	39,093
	Homeownership Vouchers	248,844	435,000	(186,156)	268,982	(20,138)
	Total	96,169,624	98,012,886	(1,843,262)	91,503,959	4,665,665
II.A	Project Based Rental Assistance (PBRA)	38,793,354	36,421,291	2,372,063	35,995,531	2,797,823
II.B	Mixed-Income Communities Operating Subsidy for AHA-Assisted Units	11,858,230	12,856,947	(998,717)	12,456,393	(598,163)
	Total	\$ 146,821,208	\$ 147,291,124	\$ (469,916)	\$ 139,955,883	\$ 6,865,325

The Housing Authority of the City of Atlanta, Georgia
FY 2016 Budget

Schedule II.A (1 of 2)					
Project-Based Rental Assistance (PBRA)					
Community	FY 2016 Budget	FY 2015 Budget	FY 2016 B Over (Under) FY 2015 B	FY 2015 Forecast	FY 2016 B Over (Under) FY 2015 F
Adamsville Green	\$ 580,623	\$ 579,331	\$ 1,292	\$ 581,721	\$ (1,098)
Arcadia At Parkway Village	780,928	784,958	(4,030)	784,768	(3,840)
Ashley Auburn Pointe I	78,220	86,094	(7,874)	82,129	(3,909)
Ashley Collegetown II	79,302	82,078	(2,776)	79,148	154
Ashley Courts At Cascade II	15,345	16,320	(975)	15,415	(70)
Ashton At Browns Mill	544,836	544,228	608	539,289	5,547
Atrium At Collegetown	904,508	925,456	(20,948)	900,611	3,897
Auburn Glenn	1,226,837	1,222,446	4,391	1,214,397	12,440
Avalon Park Family	530,727	549,826	(19,099)	529,394	1,333
Avalon Park Senior	1,265,537	1,239,317	26,220	1,253,710	11,827
Avalon Ridge Family	771,479	731,752	39,727	774,099	(2,620)
Campbell Stone	1,404,273	1,431,217	(26,944)	1,407,333	(3,060)
Capitol Gateway II	181,177	191,674	(10,497)	182,700	(1,523)
Centennial Place Phase I	387,561	385,049	2,512	379,795	7,766
Centennial Place Phase II	367,965	354,873	13,092	347,125	20,840
Centennial Place Phase III	347,832	356,544	(8,712)	348,712	(880)
Centennial Place Phase IV	356,069	327,801	28,268	355,748	321
Columbia At Sylvan Hills	561,292	575,866	(14,574)	560,000	1,292
Columbia Colony Senior	432,752	425,807	6,945	434,796	(2,044)
Columbia Commons	104,980	95,789	9,191	103,680	1,300
Columbia Heritage	1,038,876	1,038,455	421	1,038,733	143
Columbia High Point Senior	575,574	579,944	(4,370)	572,535	3,039
Columbia Mechanicsville Apartments	337,615	319,524	18,091	338,385	(770)
Columbia Senior Blackshear	533,326	540,457	(7,131)	536,893	(3,567)
Columbia Senior Edgewood	1,271,562	1,279,535	(7,973)	1,273,444	(1,882)
Columbia Senior Mechanicsville	625,217	640,842	(15,625)	615,035	10,182
Columbia Senior Milk	842,295	827,332	14,963	845,355	(3,060)
Columbia South River Gardens	361,154	383,950	(22,796)	365,094	(3,940)
Columbia Tower At MLK Village	727,260	723,066	4,194	722,407	4,853
Constitution Avenue Apartments	499,222	516,050	(16,828)	498,950	272
Crogman School Apartments	298,804	301,111	(2,307)	300,557	(1,753)
First Step	210,769	234,306	(23,537)	213,632	(2,863)
Gateway at East Point	702,422	691,103	11,319	709,205	(6,783)
GE Towers	1,506,820	629,592	877,228	774,555	732,265
Heritage Green	298,369	279,295	19,074	297,699	670

Continued on next page

The Housing Authority of the City of Atlanta, Georgia
FY 2016 Budget

Schedule II.A (2 of 2)					
Project-Based Rental Assistance (PBRA)					
Community	FY 2016 Budget	FY 2015 Budget	FY 2016 B Over (Under) FY 2015 B	FY 2015 Forecast	FY 2016 B Over (Under) FY 2015 F
Heritage Station Family	783,608	801,350	(17,742)	779,600	4,008
Heritage Station Senior	1,247,695	1,270,594	(22,899)	1,249,592	(1,897)
Highbury Terraces	116,886	124,264	(7,378)	115,366	1,520
Imperial Hotel	888,954	711,084	177,870	843,891	45,063
Legacy at Walton Lake	191,444	192,113	(669)	191,886	(442)
Manor at Scotts Crossing	720,843	716,742	4,101	725,509	(4,666)
Mechanicsville Crossing	289,927	269,598	20,329	290,530	(603)
Mechanicsville Station	348,385	348,362	23	351,476	(3,091)
Oasis at Scholars Landing (New in FY 2016)	434,940	-	434,940	-	434,940
Odyssey At Villas	221,656	235,442	(13,786)	225,920	(4,264)
O'Hearn House	259,163	291,259	(32,096)	270,943	(11,780)
Park Commons-Gates Park (HFOP)	1,020,803	1,042,117	(21,314)	1,020,693	110
Park Commons-Gates Park (HFS)	805,153	793,697	11,456	806,453	(1,300)
Parkside At Mechanicsville	311,788	301,643	10,145	307,643	4,145
Pavilion Place	337,602	338,561	(959)	338,365	(763)
Peaks At MLK	634,854	622,279	12,575	642,508	(7,654)
Quest Village III	76,990	80,242	(3,252)	76,672	318
Renaissance At Park Place South Senior	665,474	661,976	3,498	665,110	364
Retreat At Edgewood	438,341	395,471	42,870	412,235	26,106
Seven Courts	185,673	204,326	(18,653)	183,248	2,425
Summit Trail	265,453	285,814	(20,361)	244,524	20,929
Veranda At Auburn Pointe	687,824	660,092	27,732	665,471	22,353
Veranda At Auburn Pointe II	871,758	894,444	(22,686)	886,937	(15,179)
Veranda At Auburn Pointe III	912,098	916,678	(4,580)	910,119	1,979
Veranda At Carver Senior	737,395	743,555	(6,160)	736,538	857
Veranda At Collegetown	691,498	692,454	(956)	689,442	2,056
Veranda at Scholars Landing	781,767	960,505	(178,738)	788,103	(6,336)
Villas Of H.O.P.E	232,531	228,014	4,517	231,452	1,079
Welcome House	154,516	130,156	24,360	148,963	5,553
Woodbridge At Parkway Village	702,359	729,463	(27,104)	696,124	6,235
Woods at Glenrose (Discontinued in FY 2015)	-	173,866	(173,866)	20,355	(20,355)
Other new PBRA in FY 2016	1,474,448	-	1,474,448	-	1,474,448
Contingency for rent increases	550,000	714,143	(164,143)	502,814	47,186
Total Project-Based Rental Assistance (PBRA) Payments	\$ 38,793,354	\$ 36,421,292	\$ 2,372,062	\$ 35,995,531	\$ 2,797,823

The Housing Authority of the City of Atlanta, Georgia

FY 2016 Budget

Schedule II.B					
Mixed-Income Communities Operating Subsidy for AHA-Assisted Units					
Community	FY 2016 Budget	FY 2015 Budget	FY 2016 B Over (Under) FY 2015 B	FY 2015 Forecast	FY 2016 B Over (Under) FY 2015 F
Ashley Auburn Pointe I	\$ 251,825	\$ 269,443	\$ (17,618)	\$ 279,052	\$ (27,227)
Ashley Auburn Pointe II	163,352	173,690	(10,338)	330,712	(167,360)
Ashley Collegetown	285,807	319,231	(33,424)	295,834	(10,027)
Ashley Collegetown II	301,753	320,131	(18,378)	318,522	(16,769)
Ashley Courts at Cascade I	275,664	338,972	(63,308)	308,890	(33,226)
Ashley Courts at Cascade II	182,144	188,264	(6,120)	182,814	(670)
Ashley Courts at Cascade III	138,994	148,388	(9,394)	140,657	(1,663)
Ashley Terrace At West End	75,492	72,790	2,702	51,013	24,479
Atrium At Collegetown	511,235	449,495	61,740	519,025	(7,790)
Capitol Gateway I	352,737	381,386	(28,649)	361,804	(9,067)
Capitol Gateway II	230,632	265,446	(34,814)	239,496	(8,864)
Columbia Commons	284,977	274,439	10,538	282,339	2,638
Columbia Creste	305,888	327,678	(21,790)	313,241	(7,353)
Columbia Estates	336,320	297,387	38,933	311,792	24,528
Columbia Grove	245,310	218,354	26,956	230,060	15,250
Columbia Mechanicsville Apartments	393,379	326,866	66,513	397,409	(4,030)
Columbia Park Citi	356,702	370,462	(13,760)	356,034	668
Columbia Senior Residences at Mechanicsville	255,493	225,099	30,394	241,309	14,184
Columbia Village	162,646	125,165	37,481	127,972	34,674
Gardens at Collegetown	175,518	192,000	(16,482)	173,343	2,175
Magnolia Park I	326,230	504,017	(177,787)	464,142	(137,912)
Magnolia Park II	368,397	474,596	(106,199)	447,250	(78,853)
Mechanicsville Crossing	358,986	334,986	24,000	355,985	3,001
Mechanicsville Station	350,540	325,128	25,412	321,824	28,716
Parkside at Mechanicsville VI	273,326	272,201	1,125	265,159	8,167
Veranda at Auburn Pointe	117,874	127,483	(9,609)	123,782	(5,908)
Villages at Carver I	497,977	643,646	(145,669)	582,814	(84,837)
Villages at Carver II	146,529	169,023	(22,494)	152,215	(5,686)
Villages at Carver III	441,070	550,468	(109,398)	492,521	(51,451)
Villages at Carver V	259,587	363,408	(103,821)	300,460	(40,873)
Villages at Castleberry Hill I	324,130	312,292	11,838	339,937	(15,807)
Villages at Castleberry Hill II	412,534	323,025	89,509	443,844	(31,310)
Villages of East Lake I	710,512	607,451	103,061	702,319	8,193
Villages of East Lake II	1,184,670	1,136,537	48,133	1,251,561	(66,891)
Capital Reserve Contingency	300,000	400,000	(100,000)	-	300,000
Operating Contingency	500,000	1,028,000	(528,000)	751,262	(251,262)
Total Mixed-Income Communities Operating Subsidy for AHA-Assisted Units	\$ 11,858,230	\$ 12,856,947	\$ (998,717)	\$ 12,456,393	\$ (598,163)

Schedule III*
Operating Divisions Expense
FY2016 Budget

	FY 2016 Budget	FY 2015 Budget	FY 2016 B Over (Under) FY 2015 B	FY 2015 Forecast	FY 2016 B Over (Under) FY 2015 F
Customer Services Group					
Customer Services	\$ 1,393,065	\$ 1,351,775	\$ 41,290	\$ 1,602,777	\$ (209,712)
Housing Services	4,379,372	3,956,731	422,641	4,337,939	41,433
Inspections Services	1,973,239	1,616,780	356,459	1,736,306	236,933
Human Development Services	808,203	737,545	70,658	681,008	127,195
Total Customer Services Group	8,553,879	7,662,831	891,048	8,358,030	195,849
Real Estate Group					
Office of the Chief Real Estate Officer	412,270	389,946	22,324	1,071	411,199
Real Estate Development	1,064,510	1,012,559	51,951	800,771	263,739
Real Estate Oversight & Services	1,931,976	1,753,362	178,614	1,663,204	268,772
Real Estate Investments & Finance	1,674,366	1,340,291	334,075	1,528,170	146,196
Total Real Estate Group	5,083,122	4,496,158	586,964	3,993,216	1,089,906
Operations Support Group **	-	575,708	(575,708)	524,448	(524,448)
Total	\$ 13,637,001	\$ 12,734,697	\$ 902,304	\$ 12,875,694	\$ 761,307

* Please refer to Schedule III.A for FY 2016 budgeted Operating Divisions Expense by category

** In FY 2016, the Operations Support Group department expense is reallocated to Real Estate Oversight & Services, Corporate Administration Support and CSG - Inspection Services departments.

The Housing Authority of the City of Atlanta, Georgia

FY 2016 Budget

Schedule III.A					
Operating Divisions Expense by Category					
	Salaries, Benefits & Taxes	Consulting & Professional Services *	Temporary Services *	Other *	Total FY 2016 Budget
Customer Services Group					
Customer Services	\$ 1,375,415	\$ -	\$ -	\$ 17,650	\$ 1,393,065
Housing Services	4,050,899	230,639	59,584	38,250	4,379,372
Inspections Services	1,855,240	60,499	-	57,500	1,973,239
Human Development Services	799,803	-	-	8,400	808,203
Total Customer Services Group	8,081,357	291,138	59,584	121,800	8,553,879
Real Estate Group					
Office of the Chief Real Estate Officer	402,975	-	-	9,295	412,270
Real Estate Development	932,085	100,000	-	32,425	1,064,510
Real Estate Oversight & Services	1,605,580	285,817	-	40,579	1,931,976
Real Estate Investments & Finance	1,514,386	130,200	-	29,780	1,674,366
Total Real Estate Group	4,455,026	516,017	-	112,079	5,083,122
Total Operating Divisions Expense	\$ 12,536,383	\$ 807,155	\$ 59,584	\$ 233,879	\$ 13,637,001

* Please refer to "Support for Schedule III.A" at the end of this report for additional details of each expense category.

Schedule IV*
Corporate Support Expense
FY2016 Budget

Description	FY 2016 Budget	FY 2015 Budget	FY 2016 B Over (Under) FY 2015 B	FY 2015 Forecast	FY 2016 B Over (Under) FY 2015 F
Executive Office	\$ 589,519	\$ 691,952	\$ (102,433)	\$ 722,483	\$ (132,964)
Office of General Counsel	2,463,279	2,557,179	(93,900)	2,497,533	(34,254)
Finance	1,775,431	2,195,183	(419,752)	1,756,395	19,036
Information Technology	6,385,799	7,159,304	(773,506)	6,299,720	86,079
Records & Information Management	2,052,874	2,391,629	(338,755)	2,144,590	(91,716)
Enterprise Program Management Office	507,788	640,590	(132,802)	541,044	(33,256)
Office of Policy & Strategy	1,329,543	1,575,992	(246,449)	1,408,664	(79,121)
External and Governmental Affairs & Corporate Communications	763,591	696,174	67,417	591,547	172,044
Corporate Administration Support	1,090,771	612,892	477,879	346,941	743,830
Acquisition & Management Services	1,046,812	1,030,180	16,632	1,005,319	41,493
Human Resources Operations	1,010,384	1,033,511	(23,127)	935,201	75,183
Activities Managed by Human Resources:					
Professional Development & Training **	-	406,000	(406,000)	241,000	(241,000)
Business Transformation & Change Management ***	-	106,300	(106,300)	-	-
HR Technology Solutions***	-	50,000	(50,000)	50,000	(50,000)
Recruitment Fees*****	-	100,000	(100,000)	125,000	(125,000)
Risk Management*****	-	361,167	(361,167)	451,000	(451,000)
Pension Consulting Services*****	-	100,000	(100,000)	60,000	(60,000)
Agency-wide Temporary Services *****	-	100,000	(100,000)	125,000	(125,000)
Severance & Related Expense	54,500	165,000	(110,500)	279,513	(225,013)
Defined Benefit Pension Plan Contribution	1,000,000	1,000,000	-	1,000,000	-
Total	\$ 20,070,291	\$ 22,973,053	\$ (2,902,762)	\$ 20,580,950	\$ (510,659)

* Please refer to Schedule IV.A for FY 2016 budgeted Corporate Support Expense by category.

** In FY 2016, Professional Development & Training expense is included in Human Resources for agency-wide training, otherwise included in respective departments if specific to the department.

*** With the stabilization of the ERP and expected completion of the Business Transformation in FY 2015, expenses associated with the remaining optimization of the ERP (Yardi) and operation processes are included in the Information Technology department and respective AHA's departments in FY 2016 where applicable.

**** In FY 2016, HR Technology Solutions expense is included in Information Technology and Human Resources departments where applicable.

***** In FY 2016, Recruitment Fees and Pension Consulting expense are included in Human Resources.

***** In FY 2016, Risk Management expense is included in Corporate Administration Support.

***** Agency-wide Temporary Services is eliminated in FY 2016 and Temporary Services expense included in respective AHA's departments where applicable.

The Housing Authority of the City of Atlanta, Georgia
FY 2016 Budget

Schedule IV.A
Corporate Support Expense by Category

	Salaries, Benefits & Taxes	Consulting & Professional Services *	Temporary Services *	Software Licenses & Hardware/ Software Expense *	Agency-wide Services and Expenses *	Other *	Total FY 2016 Budget
Executive Office	\$ 475,530	\$ -	\$ -	\$ -	\$ -	\$ 113,989	\$ 589,519
Office of General Counsel	2,046,294	355,000	-	-	-	61,985	2,463,279
Finance	1,523,301	232,400	-	300	-	19,430	1,775,431
Information Technology	3,932,234	229,865	25,000	1,691,395	446,041	61,264	6,385,799
Records & Information Management	1,046,397	2,000	172,245	-	815,782	16,450	2,052,874
Enterprise Program Management Office	500,162	-	-	-	-	7,626	507,788
Office of Policy & Strategy	909,934	389,500	-	-	-	30,109	1,329,543
External and Governmental Affairs & Corporate Communications	638,941	100,000	-	-	-	24,650	763,591
Corporate Administration Support	461,849	301,000	-	-	296,622	31,300	1,090,771
Acquisition & Management Services	954,676	15,000	-	-	-	77,136	1,046,812
Human Resources Operations	472,818	344,273	-	-	151,565	41,728	1,010,384
Activities Managed by Human Resources:							
Severance & Related Expense	-	-	-	-	54,500	-	54,500
Defined Benefit Pension Plan Contribution	-	-	-	-	1,000,000	-	1,000,000
Total Corporate Support Expense	\$ 12,962,136	\$ 1,969,038	\$ 197,245	\$ 1,691,695	\$ 2,764,510	\$ 485,667	\$ 20,070,291

* Please refer to "Support for Schedule IV.A" at the end of this report for additional details of each expense category.

Schedule V
Human Development Support and Community Relations*
FY2016 Budget

Description	Managed by	FY 2016 Budget	FY 2015 Budget	FY 2016 B Over (Under) FY 2015 B	FY 2015 Forecast	FY 2016 B Over (Under) FY 2015 F
Human Development Support **	Customer Services Group	\$ 1,065,172	\$ 2,385,300	\$ (1,320,128)	\$ 800,000	\$ 265,172
Supportive Services at Gardens at Collegetown	Real Estate Group	168,000	168,432	(432)	132,103	35,897
Quality Living Services for Seniors	Real Estate Group	253,540	235,000	18,540	260,410	(6,870)
Community Relations	External and Governmental Affairs & Corporate Communications	16,000	16,000	-	8,000	8,000
Corporate Match for AHA Scholarship Fund - Non-MTW funds	President and CEO	11,700	11,700	-	17,104	(5,404)
Total		\$ 1,514,412	\$ 2,816,432	\$ (1,302,020)	\$ 1,217,617	\$ 296,795

* This schedule does not include human development services provided at AHA-owned residential communities by PMDs or by AHA's Customer Services Group - Human Development Services department, which are included in Schedules VI.A and III, respectively.

** Please refer to "Support for Schedule V" at the end of this report for additional details of this line item.

Schedule VI*

Operating Expense for AHA-Owned Residential Communities & Other AHA Properties FY2016 Budget

	FY 2016 Budget	FY 2015 Budget	FY 2016 B Over (Under) FY 2015 B	FY 2015 Forecast	FY 2016 B Over (Under) FY 2015 F
AHA-Owned Residential Communities					
Barge Road Highrise	\$ 971,519	\$ 1,046,076	\$ (74,557)	\$ 1,017,394	\$ (45,875)
Cheshire Bridge Road Highrise	1,257,220	1,338,496	(81,276)	1,344,547	(87,327)
Cosby Spear Highrise	2,175,297	2,287,954	(112,656)	2,393,713	(218,416)
East Lake Highrise	1,096,137	1,169,167	(73,029)	1,171,085	(74,948)
Georgia Avenue Highrise	700,828	827,742	(126,914)	798,419	(97,591)
Hightower Manor Highrise	972,875	1,050,608	(77,733)	1,205,397	(232,522)
Juniper and Tenth Highrise	1,237,061	1,291,607	(54,546)	1,365,772	(128,711)
Marian Road Highrise	1,611,898	1,642,645	(30,747)	1,636,630	(24,732)
Marietta Road Highrise	1,000,209	1,037,281	(37,072)	1,013,775	(13,566)
Martin Street Plaza	651,148	733,824	(82,676)	765,769	(114,621)
Peachtree Road Highrise	1,455,113	1,522,656	(67,543)	1,482,281	(27,168)
Piedmont Road Highrise	1,489,397	1,528,036	(38,639)	1,513,988	(24,591)
Westminster	294,836	299,725	(4,889)	296,566	(1,730)
Total AHA-Owned Residential Communities	14,913,538	15,775,817	(862,279)	16,005,336	(1,091,798)
Other AHA Properties					
AHA Headquarters Building	1,136,032	1,249,983	(113,951)	1,297,798	(161,766)
Zell Miller Center	173,279	174,709	(1,430)	151,523	21,756
PILOT and Other AHA Land	1,058,146	1,135,513	(77,367)	950,396	107,750
Total Other AHA Properties	2,367,456	2,560,205	(192,749)	2,399,717	(32,261)
Total	\$ 17,280,994	\$ 18,336,022	\$ (1,055,028)	\$ 18,405,053	\$ (1,124,059)

* Please refer to Schedule VI.A for FY 2016 budgeted Operating Expense for AHA-Owned Residential Communities & Other AHA Properties by category.

The Housing Authority of the City of Atlanta, Georgia
FY 2016 Budget

Schedule VI.A

**Operating Expense for AHA-Owned Residential Communities and Other AHA Properties
by Category**

	Administrative Expense	Utilities	Maintenance & Operations	Protective Services	Human Development Services	Other*	Total FY 2016 Budget
AHA-Owned Residential Communities							
Barge Road Highrise	\$ 229,791	\$ 179,344	\$ 290,653	\$ 119,009	\$ 100,780	\$ 51,942	\$ 971,519
Cheshire Bridge Road Highrise	318,184	305,317	350,965	120,831	99,715	62,207	1,257,220
Cosby Spear Highrise	462,388	578,427	640,934	265,938	123,776	103,834	2,175,297
East Lake Highrise	243,691	228,717	340,212	134,882	94,175	54,460	1,096,137
Georgia Avenue Highrise	125,013	139,956	229,968	109,101	64,424	32,367	700,828
Hightower Manor Highrise	215,198	173,657	292,357	147,799	85,161	58,703	972,875
Juniper and Tenth Highrise	299,362	305,820	314,934	169,450	97,798	49,697	1,237,061
Marian Road Highrise	420,239	398,704	462,796	131,813	111,823	86,523	1,611,898
Marietta Road Highrise	239,900	191,351	297,790	119,009	105,395	46,764	1,000,209
Martin Street Plaza	140,305	216,384	187,064	51,192	32,235	23,968	651,148
Peachtree Road Highrise	349,528	338,210	442,695	130,206	119,340	75,134	1,455,113
Piedmont Road Highrise	376,637	381,812	409,835	131,900	116,710	72,502	1,489,397
Westminster	50,625	86,413	123,185	9,951	12,668	11,993	294,836
Total AHA-Owned Residential Communities	3,470,861	3,524,112	4,383,390	1,641,081	1,163,999	730,094	14,913,538
Other AHA Properties							
AHA Headquarters Building	224,762	261,765	476,881	152,165	-	20,459	1,136,032
Zell Miller Center	5,644	44,989	56,336	52,680	-	13,630	173,279
PILOT and Other AHA Land	16,000	2,696	671,709	-	-	367,741	1,058,146
Total Other AHA Properties	246,406	309,450	1,204,926	204,845	-	401,830	2,367,456
Total Operating Expense for AHA-Owned Residential Communities and Other AHA Properties	\$ 3,717,267	\$ 3,833,562	\$ 5,588,316	\$ 1,845,926	\$ 1,163,999	\$ 1,131,924	\$ 17,280,994

* **Other** includes insurance, Payments in Lieu of Taxes (PILOT), bad debt expense and other expenses not included in the other categories.

Schedule VII*

Capital Expenditures for Preservation of AHA-Owned Residential Communities & AHA Headquarters FY2016 Budget

	FY 2016 Budget	FY 2015 Budget	FY 2016 B Over (Under) FY 2015 B	FY 2015 Forecast	FY 2016 B Over (Under) FY 2015 F
AHA-Owned Residential Communities					
Barge Road Highrise	\$ 190,000	\$ 349,000	\$ (159,000)	\$ 357,994	\$ (167,994)
Cheshire Bridge Road Highrise	-	923,800	(923,800)	287,350	(287,350)
Cosby Spear Highrise	-	799,000	(799,000)	205,477	(205,477)
East Lake Highrise	165,000	204,000	(39,000)	92,454	72,546
Georgia Avenue Highrise	157,000	88,200	68,800	192,902	(35,902)
Hightower Manor Highrise	12,000	180,000	(168,000)	311,080	(299,080)
Juniper and Tenth Highrise	12,000	275,000	(263,000)	330,018	(318,018)
Marian Road Highrise	-	84,300	(84,300)	395,449	(395,449)
Marietta Road Highrise	97,000	379,000	(282,000)	285,763	(188,763)
Martin Street Plaza	177,000	374,300	(197,300)	265,114	(88,114)
Peachtree Road Highrise	134,000	92,000	42,000	191,088	(57,088)
Piedmont Road Highrise	-	813,000	(813,000)	924,873	(924,873)
Westminster	36,000	9,200	26,800	150,516	(114,516)
Total AHA-Owned Residential Communities	980,000	4,570,800	3,590,800	3,990,078	(3,010,078)
AHA Headquarters Capital Expenditures					
Technology Investments	303,080	343,200	(40,120)	212,000	91,080
Capital Improvements to AHA Corporate Headquarters	-	-	-	119,681	(119,681)
Total AHA Headquarters Capital Expenditures	303,080	343,200	(40,120)	331,681	(28,601)
Total	\$ 1,283,080	\$ 4,914,000	\$ (3,630,920)	\$ 4,321,759	\$ (3,038,679)

* Please refer to "Support for Schedule VII" at the end of this report for additional details of capital expenditures.

Schedule VIII*
Development and Revitalization
FY2016 Budget

	FY 2016 Budget **	FY 2015 Budget	FY 2016 B Over (Under) FY 2015 B	FY 2015 Forecast	FY 2016 B Over (Under) FY 2015 F
Demolition & Remediation	\$ 393,000	\$ 1,577,819	\$ (1,184,819)	\$ 756,347	\$ (363,347)
Acquisitions	-	5,460,000	(5,460,000)	110,000	(110,000)
Predevelopment Loans	1,969,378	3,072,500	(1,103,122)	640,622	1,328,756
Developer Loan Draws	1,375,000	1,391,868	(16,868)	1,141,868	233,132
Site Improvements	10,000	-	10,000	-	10,000
Extraordinary Sitework	-	2,292,000	(2,292,000)	1,734,810	(1,734,810)
Homeownership Down Payment Loans	1,350,000	660,000	690,000	1,400,000	(50,000)
Non Residential Structures	4,000,000	2,000,000	2,000,000	-	4,000,000
Public Improvements	11,765,740	11,565,582	200,158	5,765,420	6,000,320
Consulting and Professional Services	1,360,933	984,834	376,099	666,362	694,571
Legal Expense	40,000	370,000	(330,000)	53,403	(13,403)
Meeting Expense	43,848	-	43,848	-	43,848
Community Improvements	-	610,000	(610,000)	-	-
Administrative Salaries & Benefits	-	176,333	(176,333)	-	-
Office Rent	-	37,500	(37,500)	-	-
Human Development Support	-	675,877	(675,877)	-	-
Tenant Services Salaries & Benefits	-	246,033	(246,033)	-	-
Grounds	-	45,000	(45,000)	4,900	(4,900)
Other Misc Admin Expenses	-	89,000	(89,000)	9,398	(9,398)
Total Development and Revitalization Expenditures	\$ 22,307,899	\$ 31,254,346	\$ (8,946,447)	\$ 12,283,130	\$ 10,024,769
Sources of Funds					
Replacement Housing Factor (RHF) Grants	\$ 6,714,635	\$ 7,397,034	\$ (682,399)	\$ 5,593,494	\$ 1,121,141
Choice Neighborhoods Implementation & Other Grants	-	1,705,299	(1,705,299)	450,000	(450,000)
Funds Restricted for Revitalization Activities Accumulated in Prior Years	6,400,190	6,915,058	(514,868)	2,694,458	3,705,732
Public Improvement Funds Provided by the City of Atlanta and Other City Agencies	2,154,515	555,000	1,599,515	56,368	2,098,147
MTW Funds used for Revitalization	7,038,559	15,150,398	(8,111,839)	3,957,253	3,081,306
Total Sources of Funds	\$ 22,307,899	\$ 31,722,789	\$ (9,414,890)	\$ 12,751,573	\$ 9,556,326
RHF Fees for Service to Support Administrative Expenses	\$ -	\$ 468,443	\$ (468,443)	\$ 468,443	\$ (468,443)

* Please refer to Schedule VIII.A for Development and Revitalization activities by community/property.

** This Budget does not include the 2014 Choice Neighborhoods Implementation Grant, and associated expenses, expected to be awarded in or about September 2015.

The Housing Authority of the City of Atlanta, Georgia

FY 2016 Budget

Schedule VIII.A

Development and Revitalization by Community/Property

<u>Community/Property</u>	Auburn Pointe	Capital Gateway	Villages at Carver	Centennial Place	West Highlands	Mechanics ville	Scholars Landing	Collegetown at West End	RAD Conversion *	Other Development **	Total FY 2016 Budget
Development and Revitalization Expenditures											
Demolition & Remediation	\$ 20,000	\$ 120,000	\$ -	\$ -	\$ 3,000	\$ -	\$ -	\$ -	\$ -	\$ 250,000	\$ 393,000
Predevelopment Loans	-	-	-	459,378	-	-	160,000	-	1,350,000	-	1,969,378
Developer Loan Draws	-	-	-	-	-	-	-	-	1,375,000	-	1,375,000
Site Improvements	-	-	-	-	10,000	-	-	-	-	-	10,000
Homeownership Down Payment Loans	-	-	-	-	125,000	400,000	-	400,000	-	425,000	1,350,000
Non Residential Structures	-	-	-	-	-	-	4,000,000	-	-	-	4,000,000
Public Improvements	-	-	-	1,774,808	6,741,049	-	3,249,883	-	-	-	11,765,740
Consulting and Professional Services	67,989	33,083	35,000	54,000	79,000	-	156,861	60,000	100,000	775,000	1,360,933
Legal Expense	-	-	-	-	-	-	-	-	-	40,000	40,000
Meeting Expense	-	-	-	-	-	-	28,848	-	-	15,000	43,848
Total Development and Revitalization Expenditures	\$ 87,989	\$ 153,083	\$ 35,000	\$ 2,288,186	\$ 6,958,049	\$ 400,000	\$ 7,595,592	\$ 460,000	\$ 2,825,000	\$ 1,505,000	\$ 22,307,899
Sources of Funds											
Replacement Housing Factor (RHF) Grants	\$ 25,485	\$ -	\$ -	\$ 330,000	\$ -	\$ -	\$ 3,534,150	\$ -	\$ 2,825,000	\$ -	\$ 6,714,635
Funds Restricted for Revitalization Activities Accumulated in Prior Years	-	-	-	-	6,371,342	-	28,848	-	-	-	6,400,190
Public Improvement Funds Provided by the City of Atlanta and Other City Agencies	-	-	-	1,774,808	379,707	-	-	-	-	-	2,154,515
MTW Funds used for Revitalization	62,504	153,083	35,000	183,378	207,000	400,000	4,032,594	460,000	-	1,505,000	7,038,559
Total Sources of Funds	\$ 87,989	\$ 153,083	\$ 35,000	\$ 2,288,186	\$ 6,958,049	\$ 400,000	\$ 7,595,592	\$ 460,000	\$ 2,825,000	\$ 1,505,000	\$ 22,307,899

* Please refer to Schedule VIII.A.1 for additional information on Rental Assistance Demonstration (RAD) Conversion activities by community.

** Please refer to Schedule VIII.A.2 for additional information on Other Development activities by property.

The Housing Authority of the City of Atlanta, Georgia

FY 2016 Budget

Schedule VIII.A.1

RAD Conversion by Community

<u>Community</u>	Villages of East Lake I	Villages of East Lake II	Piedmont Road Highrise	Cosby Spear Highrise	Cheshire Bridge Road Highrise	Juniper and Tenth Highrise	Total FY 2016 Budget
Development and Revitalization Expenditures							
Predevelopment Loans	\$ 300,000	\$ 300,000	\$ 350,000	\$ 150,000	\$ 100,000	\$ 150,000	\$ 1,350,000
Developer Loan Draws	500,000	500,000	375,000	-	-	-	1,375,000
Consulting and Professional Services	25,000	25,000	50,000	-	-	-	100,000
Total Development and Revitalization Expenditures	\$ 825,000	\$ 825,000	\$ 775,000	\$ 150,000	\$ 100,000	\$ 150,000	\$ 2,825,000
Sources of Funds							
Replacement Housing Factor (RHF) Grants	\$ 825,000	\$ 825,000	\$ 775,000	\$ 150,000	\$ 100,000	\$ 150,000	\$ 2,825,000
Total Sources of Funds	\$ 825,000	\$ 825,000	\$ 775,000	\$ 150,000	\$ 100,000	\$ 150,000	\$ 2,825,000

The Housing Authority of the City of Atlanta, Georgia

FY 2016 Budget

Schedule VIII.A.2 Other Development by Property

<u>Property</u>	North Avenue	Magnolia Perimeter	Herndon	Other	Total FY 2016 Budget
Development and Revitalization Expenditures					
Demolition & Remediation	\$ 250,000	\$ -	\$ -	\$ -	\$ 250,000
Homeownership Down Payment Loans	-	75,000	-	350,000	425,000
Consulting and Professional Services	25,000	-	50,000	700,000	775,000
Legal Expense	-	-	-	40,000	40,000
Meeting Expense	-	-	-	15,000	15,000
Total Development and Revitalization Expenditures	\$ 275,000	\$ 75,000	\$ 50,000	\$ 1,105,000	\$ 1,505,000
Sources of Funds					
MTW Funds used for Revitalization	\$ 275,000	\$ 75,000	\$ 50,000	\$ 1,105,000	\$ 1,505,000
Total Sources of Funds	\$ 275,000	\$ 75,000	\$ 50,000	\$ 1,105,000	\$ 1,505,000

Schedule IX
ERP Solution*
FY2016 Budget

	FY 2016 Budget	FY 2015 Budget	FY 2016 B Over (Under) FY 2015 B	FY 2015 Forecast	FY 2016 B Over (Under) FY 2015 F
Yardi Professional Services					
Implementation Services	\$ -	\$ 679,400	\$ (679,400)	\$ 350,000	\$ (350,000)
Customizations	-	-	-	33,120	(33,120)
Software Licensing Costs	-	380,000	(380,000)	380,000	(380,000)
Total	\$ -	\$ 1,059,400	\$ (1,059,400)	\$ 763,120	\$ (763,120)

* With the stabilization of the ERP and expected completion of the Business Transformation in FY 2015, budgeted FY 2016 expenses associated with the remaining optimization of the ERP (Yardi) and operation processes have been included in the Information Technology and respective AHA's departments where applicable. Please refer to Schedule IX.A for a final cost analysis of the ERP Program.

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Capital Planning – FY 2017

Major Capital Needs, Projects, and Estimated Costs

This section describes AHA's capital plans using MTW funds. AHA established four priorities for FY 2017 capital improvements at the AHA-Owned Residential Communities:

1. Health and safety of residents
2. Property viability
3. Energy conservation
4. Redevelopment through Rental Assistance Demonstration (RAD) or AHA Reformulation for the AHA-Owned Residential Communities or AHA-Sponsored Mixed-Income Communities.

AHA plans the following expenditures for capital improvements at the AHA-Owned Residential Communities during FY 2017:

AHA-Owned Residential Community	Budget	Capital Improvements
Barge Road Highrise	\$163,000	Site/Building Improvements and Furniture, Fixtures & Equipment
Cheshire Bridge Road Highrise	\$203,000	
Cosby Spear Highrise	\$300,000	
East Lake Highrise	\$188,000	
Georgia Avenue Highrise	\$102,000	
Hightower Manor Highrise	\$163,000	
Marian Road Highrise	\$301,000	
Marietta Road Highrise	\$163,000	
Martin Street Plaza	\$75,000	
Peachtree Road Highrise	\$247,000	
Piedmont Road Highrise	\$55,000	
Westminster	\$40,000	
Total Capital Improvements	\$2,000,000	

As described in the FY 2017 MTW Annual Plan, AHA will explore development options for one or more of the AHA-Owned Residential Communities and AHA-Sponsored Mixed-Income Communities based on development plans submitted by the Property Management-Developers (PMDs) and our development partners. AHA may choose to utilize Replacement Housing Factor (RHF) funding or Capital Improvement funding to support the redevelopment of those properties chosen as the first priority for reformulation or conversion strategies. AHA funding could include, but is not limited to:

1. Pre-development loans for the PMDs
2. Paying off the Energy Performance Contract (EPC) loan for the selected AHA-Owned Residential Communities
3. Gap financing for the Rental Assistance Demonstration (RAD)/Reformulation deal

AHA is considering advancing the redevelopment plans for the following properties during FY 2017:

Cosby Spear Highrise, Centennial Place Phases II and III, Hightower Manor Highrise, Juniper & Tenth Highrise, Piedmont Road Highrise, Peachtree Road Highrise, Village at Castleberry Hill Phases I and II, Villages at Carver Phase I, and the Villages of East Lake Phases I and II.

Combined Statements of Revenues, Expenses and Changes in Net Position

The Housing Authority of the City of Atlanta, Georgia
**STATEMENTS OF REVENUE, EXPENSE AND
CHANGES IN NET POSITION**
Year Ended June 30, 2015

	<u>2015</u>
OPERATING REVENUES	
MTW Single Fund used for operating expenses	\$ 181,428,600
Tenant dwelling revenue	5,876,474
Development grants used for operating expenses	1,709,290
Fees earned from National Housing Compliance	630,872
Other operating revenues	<u>1,558,848</u>
Total operating revenues	191,204,084
OPERATING EXPENSES	
Housing assistance and operating subsidy payments	135,920,454
Administration, including direct operating divisions	35,469,507
Utilities, maintenance and protective services	12,495,604
Resident and participant services	3,214,506
Revitalization, demolition and remediation	1,788,284
General expenses	1,896,019
Depreciation and amortization	<u>11,905,128</u>
Total operating expenses	<u>202,689,502</u>
NET OPERATING INCOME (LOSS)	(11,485,418)
NON-OPERATING REVENUES (EXPENSES)	
Interest and investment income	910,272
Gain (loss) on sale of assets	7,702
Valuation allowance	(1,610,978)
Interest expense	<u>(444,322)</u>
Total non-operating revenues (expenses)	<u>(1,137,326)</u>
INCOME (LOSS) BEFORE CAPITAL CONTRIBUTIONS	(12,622,744)
CAPITAL CONTRIBUTIONS	
MTW Single Fund used for modernization and development capital expenditures and loans	5,935,592
Development grants used for development, capital expenditures and loans	<u>3,951,599</u>
Total capital contributions	<u>9,887,191</u>
INCREASE (DECREASE) IN NET POSITION	(2,735,553)
NET POSITION — beginning of year	437,357,980
NET POSITION — end of year	<u>\$ 434,622,427</u>

Source: AHA Comprehensive Annual Financial Report and Independent Auditors'
Report for the fiscal years ended June 30, 2015 and 2014



Amended and Restated Statement of Corporate Policies

Adopted by the Board of Commissioners

March 30, 2016

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The Housing Authority of the City of Atlanta, Georgia

Amended and Restated Statement of Corporate Policies

PREAMBLE

The *Amended and Restated Statement of Corporate Policies* (Statement of Corporate Policies) is the controlling policy document governing the rental assistance programs administered by The Housing Authority of the City of Atlanta, Georgia (“Atlanta Housing Authority” or “AHA”). The Statement of Corporate Policies captures the Moving to Work Demonstration policy innovations in effect for the AHA-Sponsored Mixed-Income, Mixed-Finance Residential Communities, AHA-Owned Residential Communities, Housing Choice Tenant-Based Program, Project Based Rental Assistance, and Supportive Housing (collectively “Rental Assistance Programs”). Finally, the Statement of Corporate Policies is organized around Atlanta Housing Authority’s guiding principles and its corporate vision, *Healthy Mixed-Income Communities; Healthy Self-Sufficient Families*.

The Statement of Corporate Policies is organized into the following chapters:

Chapter 1: General Policy Requirements for Rental Assistance Programs

Chapter 2: AHA-Assisted Unit Policies

Chapter 3: Housing Choice Tenant-Based Program Policies

Chapter 4: Supportive Housing Policies

Administrative processes, operating procedures, protocols, and management practices for any policy, initiative, or approach shall be developed pursuant to this Statement of Corporate Policies and are subject to Atlanta Housing Authority’s prior review and approval. Such approval may be amended and/or withdrawn from time-to-time at the discretion of Atlanta Housing Authority.

The President and Chief Executive Officer of Atlanta Housing Authority, as vested by the Board of Commissioners, can authorize revisions, as appropriate, to this Statement of Corporate Policies in order to clarify the original intent of any policy enumerated herein without the prior approval of the Board of Commissioners, provided that any such revision to this Statement of Corporate Policies does not substantially change the original intent of any policy. Significant changes to major policy provisions in this Statement of Corporate Policies must be approved by the Board of Commissioners.

This Statement of Corporate Policies adopted by the AHA Board of Commissioners on March 30, 2016 supersedes the *Amended and Restated Statement of Corporate Policies* adopted on March 25, 2015.

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**AMENDED AND RESTATED STATEMENT OF CORPORATE POLICIES
TABLE OF CONTENTS**

PREAMBLE

iii

CHAPTER 1 – GENERAL POLICY REQUIREMENTS FOR RENTAL ASSISTANCE PROGRAMS

<u>Part/Article</u>	<u>Page</u>
1. Objective	1
2. Definitions	1
3. Moving to Work Demonstration	1
4. Fair Housing and Equal Opportunity	2
5. Deconcentration	2
6. Reasonable Accommodation	3
7. Definitions of Family	4
8. Disabilities Definition for Program Eligibility Determination	4
9. Live-in Aide Policy	5
10. Work Requirement	6
11. General Rent Policies	7
12. Recertification	10
13. Special Programs, Policies and Strategic Initiatives	11
14. Economic Self-Sufficiency	11
15. Criminal History Screening	12
16. Fraud and Misrepresentation	15
17. Response to Federally Declared Disasters	15

CHAPTER 2 – AHA-ASSISTED UNIT POLICIES

<u>Part/Article</u>	<u>Page</u>
Part I – Introduction	17
1. General Policy Requirements	17
2. AHA-Assisted Unit	17
3. Management and Administration	18
4. Applicability of Policies to Applicants and Residents	19
5. Site-Based Waiting List Policy	19
6. Reasonable Accommodations	19
7. Private Sector Innovation	20
Part II – Applicant and Resident Suitability	21
1. Determining Criteria	21
2. Initial Leasing Considerations	21
3. Applicant Selection Policies	22
4. General Considerations for Applicant Selection from a Site-Based Waiting List	23
5. Order of Selection for UFAS-Accessible Units	25
6. Screening of Applicants and Residents	27
7. Dispute Process for Adverse Criminal History Decisions	28
Part III – Resident Benefits and Opportunities	30
1. Rent Structures and Related Policies	30
2. Basic Lease Obligations and Responsibilities	32
3. Occupancy, Charges and Allowances	32
4. Transfers	33
5. Pet Policy	34
6. Disputing Decisions of Manager	36

**AMENDED AND RESTATED STATEMENT OF CORPORATE POLICIES
TABLE OF CONTENTS**

CHAPTER 2 – AHA-ASSISTED UNIT POLICIES (Continued)

<u>Part/Article</u>	<u>Page</u>
Part IV – Miscellaneous	38
1. Availability of Official Leasing Documents	38
2. Approval of Management Practices	38

CHAPTER 3 – HOUSING CHOICE TENANT-BASED PROGRAM POLICIES

<u>Part/Article</u>	<u>Page</u>
Part I – Introduction	39
1. General Policy Requirements	39
2. Program Management and Operating Procedures	39
Part II – Admission to the Program	39
1. Waiting List Notification	39
2. Waiting List Application Process	40
3. Organization and Maintenance of the Waiting List	40
4. Special Admissions	40
5. Eligibility Determinations	41
Part III – Program Participation	41
1. Family Briefings	41
2. Voucher Issuance	41
3. Voucher Size	42
4. Transfer of Assistance	42
5. Suitability	42
6. Participant Obligations and Responsibilities	42
7. Program Move	43
8. Portability	43
Part IV – AHA Submarket Payment Standards and Contract Rent Determination	44
1. MTW Authorization	44
2. AHA Submarket Payment Standards	44
3. Setting Reasonable Contract Rents	45
4. AHA Submarket Payment Standards Limitations on Contract Rents	45
Part V – Inspections	46
1. Quality Units	46
2. Frequency of Inspections	46
3. Program Marketing and Outreach	47
Part VI – Housing Choice Rental Assistance Agreement	47
1. Business Relationships between AHA and Owners/Landlords	47
2. Lease Addendum	47
3. Lease and HCRA Agreement Termination	47
4. Enhancements to HCRA Agreement and Lease Addendum	47
5. Business Relationship Program Procedures	47

**AMENDED AND RESTATED STATEMENT OF CORPORATE POLICIES
TABLE OF CONTENTS**

CHAPTER 3 – HOUSING CHOICE TENANT-BASED PROGRAM POLICIES (Continued)

<u>Part/Article</u>	<u>Page</u>
Part VII – Program Terminations	48
1. Denial and Termination of Assistance	48
2. Other Terminations of HCRA Agreements and Participation Assistance	48
3. Termination of Assistance Notification	49
4. Informal Reviews and Informal Hearings	49
Part VIII – Inter-Jurisdictional Cooperation	50
1. Cooperative Agreements	50
Part IX – Special Programs	51
1. Special Programs Policy	51
Part X – Homeownership Policy	51
1. Authorization	51
2. Program Implementation and Administration	51

CHAPTER 4 – SUPPORTIVE HOUSING POLICIES

<u>Part/Article</u>	<u>Page</u>
Part I – Introduction	52
1. General Policy Requirements	52
2. Background for Establishment of Supportive Housing Program	52
3. Supportive Housing Operating Procedures	53
4. Definitions	53
5. Rent Determinations	54
Part II – PBRA Proposal Selection and Site-Based Administration	54
1. Proposal Selection	54
2. Supportive Housing PBRA Agreement	55
3. Owner’s Operating Procedures	55
4. Training	56
Part III – Admission and Residency Requirements	56
1. Supportive Housing Eligibility Requirements	56
2. Occupancy Arrangements	57
3. Denial of Admission and Termination of Assistance	57
4. Term of Rental Assistance	58
Part IV – Service Provider Arrangements	58
1. Service Provider Agreement	58
2. Approval of the Service Provider	59
3. Service Delivery Coordination	59
4. Service Coordinator Agreement	59

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CHAPTER 1

GENERAL POLICY REQUIREMENTS FOR RENTAL ASSISTANCE PROGRAMS

ARTICLE ONE.

OBJECTIVE

1. This Chapter 1 sets forth the general requirements applicable to all Rental Assistance Programs covered under this Statement of Corporate Policies (“General Policy Requirements”).
2. While there are policies that are unique to each Rental Assistance Program (“Program-Specific Policies”), the General Policy Requirements represent certain fundamental policies that apply to all Rental Assistance Programs, which are to be used in tandem with the Program-Specific Policies as set forth in Chapters 2, 3 and 4 of this Statement of Corporate Policies.
3. In the event there should be any questions regarding the interpretation of the General Policy Requirements and Program-Specific Policies, the Legal Department and/or Policy Department will respond to any such policy questions.

ARTICLE TWO.

DEFINITIONS

Definitions applicable to the General Policy Requirements in this Chapter 1 of the Statement of Corporate Policies are set forth below.

1. “AHA-Assisted Household” means any household that receives assistance under any one of AHA’s Rental Assistance Programs.
2. “Applicant” means any household that has applied for assistance under a Rental Assistance Program.
3. “Covered Unit” means a Rental Assistance Program unit occupied by an AHA-Assisted Household.
4. “Management Agent” means the management company, property manager and/or other management personnel that manage a property on behalf of the owner of the property that has one or more Covered Units.
5. “Owner Entity” means the owner of the property that contains one or more Covered Units.

ARTICLE THREE.

MOVING TO WORK DEMONSTRATION

1. The Statement of Corporate Policies is aligned with the Amended and Restated Moving to Work Agreement, effective as of November 13, 2008, as further amended by that certain Second Amendment to the Moving to Work Agreement, effective as of January 16, 2009, as may be amended or extended from time to time, by and between the U.S. Department of Housing and Urban Development and Atlanta Housing Authority (MTW Agreement). The MTW Agreement governs and supersedes, as appropriate, applicable Federal laws, rules, regulations, contracts, and agreements that have been or will be waived and/or modified by the MTW Agreement.

2. As a Moving to Work agency, Atlanta Housing Authority has and will continue to establish, implement and evaluate innovative cost-effective affordable housing strategies that are designed to improve operational efficiencies and help low-income families achieve greater economic independence.
3. While recognizing that implementation of various policy initiatives may be immediate, progressive, or refined through various activities and demonstration programs, the implementation of these strategic initiatives, not expressly enumerated in Atlanta Housing Authority's MTW Annual Plan, may be advanced, provided such strategic initiatives are consistent with these policies and the spirit and intent of the authorizations under the MTW Agreement.
4. Administrative procedures, processes and general management practices for new strategic initiatives shall be developed following the intent of this Statement of Corporate Policies and, upon review and approval, may be amended from time-to-time at the discretion of Atlanta Housing Authority.

ARTICLE FOUR.

FAIR HOUSING AND EQUAL OPPORTUNITY

1. Atlanta Housing Authority supports all applicable Federal and State nondiscrimination and fair housing laws and applicable HUD regulations in all housing and program activities. Atlanta Housing Authority responds to fair housing and equal opportunity complaints brought to its attention to ensure compliance with all applicable laws and regulations.
2. Atlanta Housing Authority supports the protections afforded victims under the *Violence Against Women Act* in its Rental Assistance Programs, as applicable.
3. Atlanta Housing Authority acknowledges the importance of serving persons with Limited English Proficiency (LEP) in its Rental Assistance Programs, as applicable. Persons with LEP are individuals who, because of their national origin, do not speak English as their primary language and who have a limited ability to speak, read, write or understand English. In accordance with Federal guidelines, Atlanta Housing Authority, Owner Entities and Management Agents will make reasonable efforts to provide or arrange language assistance for program Applicants and members of AHA-Assisted Households with LEP if they require such assistance in order to access AHA's Rental Assistance Program and related activities.

ARTICLE FIVE.

DECONCENTRATION

1. In order to realize its corporate vision of Healthy Mixed-Income Communities/Healthy Self-Sufficient Families, Atlanta Housing Authority is pledged to outcomes that promote the deconcentration of poverty in the administration of its Rental Assistance Programs.
2. With respect to the percentage of AHA-Assisted Households residing in a multifamily community, Atlanta Housing Authority's Deconcentration Policy provides that, unless Atlanta Housing Authority approves a lower percentage, it will assist:

- A. No more than fifty percent (50%) of the Covered Units in a multifamily community built or substantially rehabilitated for occupancy by Families, as this term is defined in Article Seven of this Chapter 1, may be assisted under Section 8 and/or Section 9 of the United States Housing Act of 1937, as amended (“Act”); and
 - B. Up to 100% of the Covered Units in a multifamily community that was officially designated, built or substantially rehabilitated for occupancy by Elderly Families, Disabled Families, and/or Families enrolled in an AHA-approved supportive housing program, as these terms are defined in Article Seven of this Chapter 1, may be assisted under Section 8 and/or Section 9 of the Act.
3. Under Moving to Work, Atlanta Housing Authority has the authority to pursue locally driven policies, procedures and programs with the aim of developing better, more efficient and effective ways of providing quality, mixed-income housing to low income families
 4. Atlanta Housing Authority will also continue to reposition its portfolio of public housing developments through a variety of strategies, foremost of which is the transformation of its conventional public housing developments into market-rate, mixed-income communities, each with a seamless affordable component and households having a range of incomes and diverse backgrounds.
 5. Atlanta Housing Authority will seek to ensure that the placement of supportive housing units in residential communities will be sensitive and thoughtful in addressing community standards while promoting the unique requirements of supportive housing participants.
 6. Atlanta Housing Authority, in its discretion, may develop a deconcentration strategy that would limit the percentage of AHA-Assisted Households in designated census tracts in the City of Atlanta with the goal and intent of limiting occupancy in areas with high poverty concentrations.

ARTICLE SIX.

REASONABLE ACCOMMODATIONS

Atlanta Housing Authority is committed to assisting persons with disabilities and will make reasonable accommodations in policies, procedures, rules and services when such accommodations are necessary to afford persons with disabilities an equal opportunity to participate in or benefit from its programs. Requests for accommodations must be reasonable, meaning Atlanta Housing Authority, Owner Entities and Management Agents are not required to provide accommodations which would cause either undue financial and administrative burden or a fundamental alteration in the nature of AHA’s Rental Assistance Programs. Requests for Reasonable Accommodations will be considered on a case-by-case basis so that consideration can be given to, among other factors, the cost of the requested accommodation, the benefits that the accommodation would provide to the requester and the availability of alternative accommodations that would effectively meet the requester’s disability-related needs. These reasonable accommodations shall extend to the administration of AHA’s Rental Assistance Programs, as applicable, by Atlanta Housing Authority, Owner Entities and Management Agents with respect to application procedures and program participation.

ARTICLE SEVEN.

DEFINITIONS OF FAMILY

1. A Family is defined as one or more persons who may or may not be related that are residing together in the same household.
2. An Elderly Family is defined as a Family in which each and every adult member of the household is an “Elderly Person,” age 62 or older and, in addition, may include one or more persons with disabilities as defined below in Section 3 of this Article Seven.
3. A Disabled Family is defined as a Family in which each and every **adult** member of the household is a “Disabled Person” with a verified qualifying disability and, in addition, may include one or more Elderly persons. The definition of a Disabled Person in this context is consistent with HUD’s definition of a “person with disabilities” for program eligibility purposes as set forth in Article Eight.
4. An Elderly Family or Disabled Family with one or more members under the age of 18 will qualify as an Elderly Family or Disabled Family.
5. Any member of an AHA-Assisted Household who is (i) under the age of 18, (ii) a person (other than the head, co-head or spouse) with a verified qualifying disability, or (iii) a full-time student (subject to documented verification) up to the age of 24 will be considered a dependent of the AHA-Assisted Household (“Dependent”). The definition of a “person with disabilities” in this context is consistent with HUD’s definition of a “person with disabilities” for program eligibility purposes as set forth below in Article Eight.

ARTICLE EIGHT.

DISABILITY DEFINITIONS FOR PROGRAM ELIGIBILITY DETERMINATIONS

To determine whether a person is a Disabled Person or a “person with disabilities” for the purpose of establishing program eligibility, HUD applies the following definitions:

1. A Disabled Person is one with an inability to engage in any substantial gainful activity because of any medically determinable physical or mental impairment that is expected to result in death or has lasted or can be expected to last continuously for at least 12 months; or for a blind person at least 55 years old, inability because of blindness to engage in any substantial gainful activities comparable to those in which the person was previously engaged with some regularity and over a substantial period.
2. A developmentally Disabled Person is one with a severe chronic disability that:
 - A. Is attributed to a mental and/or physical impairment;
 - B. Has manifested before age 22;
 - C. Is likely to continue indefinitely;
 - D. Results in substantial functional limitations in three or more of the following areas: capacity for independent living, self-care, receptive

and expressive language; learning, mobility, self-direction, and economic self-sufficiency; and

- E. Requires special interdisciplinary or generic care treatment, or other services which are of extended or lifelong duration and are individually planned or coordinated.
- 3. A Disabled Person is also one who has a physical, emotional or mental impairment that:
 - A. Is expected to be of long-continued or indefinite duration;
 - B. Substantially impedes the Disabled Person's ability to live independently; and
 - C. Is such that the Disabled Person's ability to live independently could be improved by more suitable housing conditions.
- 4. A person whose disability is based solely on any drug or alcohol dependence is not to be considered a person with disabilities for program eligibility purposes.

ARTICLE NINE.

LIVE-IN AIDE POLICY

- 1. A Live-in Aide that is essential for the care and support of an Elderly Person or Disabled Person who is a member of an AHA-Assisted Household, the need for which having been certified by a medical or other qualified professional having knowledge of the need, may reside in the Covered Unit with the Elderly Person or Disabled Person.
- 2. As a reasonable accommodation and as approved by AHA, a member of an AHA-Assisted Household who provides the same care and meets the same qualifications as a Live-in Aide would be deemed a "Caretaker." A Caretaker may be granted an exemption from the Work Requirement pursuant to Article Ten, Section 3 of this Chapter 1.
- 3. The AHA-Assisted Household may request a Covered Unit with no more than one additional bedroom under the applicable Rental Assistance Program, in order to provide space in the Covered Unit for a Live-in Aide. The Live-in Aide selected by the AHA-Assisted Household may not be qualified to serve in this capacity if the Live-in Aide requires more than one additional bedroom due to a reason not essential for the care and support of the member of the household who is an Elderly Person or Disabled Person.
- 4. In that Atlanta Housing Authority, the Owner Entities and their respective Management Agents, as applicable, have the sole authority to approve a Live-in Aide, a Live-in Aide must demonstrate her/his suitability to reside in the Covered Unit prior to occupancy, and continue to demonstrate her/his suitability and status as a Live-in Aide for as long as the Live-in Aide resides in the Covered Unit.
- 5. Live-in Aides must consent to screening requirements of Atlanta Housing Authority, the Owner Entities and their respective Management Agents, as applicable, including, without limitation, criminal background screening and a review of past participation in an Atlanta Housing

Authority program or residence in the Covered Unit's community or another community owned by Atlanta Housing Authority or an Owner Entity, or a community managed by the Management Agent.

6. Live-in Aides, having no tenancy rights under state law or other rights to the Covered Unit under any Rental Assistance Program, as applicable, must vacate the Covered Unit if the Elderly or Disabled person they are assisting ceases to qualify for a Live-in Aide, ceases to qualify for the Covered Unit, or vacates the premises, which in any case shall result in the Live-in Aide having absolutely no right to continue to reside in the Covered Unit or to receive rental assistance or to remain on the premises.
7. Further, Atlanta Housing Authority, the Owner Entity or Management Agent reserve the right, in each's respective sole discretion, to require a Live-in Aide, who is not a member of the AHA-Assisted Household and therefore not afforded the protections of the Lease or any agreement between AHA and the Owner Entity pursuant to any Rental Assistance Program, as applicable, to vacate the Covered Unit if he or she is no longer performing as a Live-in Aide in the Covered Unit or exhibits such other behavior that is deemed disruptive to the community and/or its residents.

ARTICLE TEN.

WORK REQUIREMENT

Applicants to AHA's Rental Assistance Programs and AHA-Assisted Households under one of AHA's Rental Assistance Programs are required to comply with Atlanta Housing Authority's Work Requirement.

1. The Work Requirement establishes that:

- A. At least one adult member of the household, age 18 - 61 must be legally employed or self-employed in a legitimate business enterprise, appropriately documented, either on a full-time equivalent basis or for at least 30 hours per week;

AND

- B. All other household members, ages 18 – 61, must be actively engaged in one of the following:

- i. Full-Time Work: Legally employed or self-employed either on a full-time equivalent basis or for at least 30 hours per week;
- ii. Full-Time School/Training: Enrolled in and attending an AHA-recognized school or institution as a full-time student; or
- iii. Part-Time Work and Part-Time School/Training: Combined minimum of 30 hours per week of employment and education/training with the following conditions:

- a. Legally employed (but not self-employed) on a part-time basis;

AND

- b. Enrolled in and attending an AHA-recognized school or institution on a part-time basis;

OR

- c. Participating in an AHA-recognized training program.
- C. Exemptions from Atlanta Housing Authority's Work Requirement
- i. Elderly Persons are exempt from AHA's Work Requirement.
 - ii. Disabled Persons are also exempt from AHA's Work Requirement. The definition of a Disabled Person in this context is consistent with HUD's definition of a "person with disabilities" for program eligibility purposes as set forth above in Article Eight.
- 2. Applicants to AHA's Rental Assistance Programs and AHA-Assisted Households assisted under one of AHA's Rental Assistance Programs may either be denied admission to or terminated from the Rental Assistance Program, as applicable, for failure to comply with the Work Requirement.
 - 3. As a reasonable accommodation, either the head-of-household of the AHA-Assisted Household or another adult member of the household who would otherwise be required to meet the Work Requirement but who is needed for the essential care and support of a member of the household who is an Elderly Person or Disabled Person, or other member who requires essential care and support for an indefinite period of time, the need for which having been certified by a medical or other qualified professional having knowledge of the need, may qualify for a "Caretaker Exemption" from the Work Requirement for as long as the Elderly Person, Disabled Person or other member requires such essential care and support. The procedures for granting Caretaker Exemptions are set forth in the operating procedures of the applicable Rental Assistance Program.

ARTICLE
ELEVEN

GENERAL RENT POLICIES

- 1. Atlanta Housing Authority, in its discretion, may explore innovative rent simplification strategies and methodologies for determining Tenant Rent, as defined below in Section 4, that benefit AHA-Assisted Households, while streamlining administrative processes, improving cost-effectiveness and promoting operational efficiencies ("Rent Simplification"). Prior to the implementation of any proposed Rent Simplification strategy or methodology, AHA will conduct an impact analysis to determine whether the implementation of any change in determining Tenant Rent will result in unreasonable rent burdens for AHA-Assisted Households ("Rent Burden Analysis"). The Rent Burden Analysis supporting any proposed Rent Simplification strategy or methodology must be submitted to and approved by the AHA Board of Commissioners before implementation.
- 2. Atlanta Housing Authority, in its discretion, may establish fixed-rate or standard deductions and asset determination procedures to be used in calculating Income-Adjusted Rents. Standard income deductions would replace the calculation of income deductions based on actual expenses. Asset determinations would examine the nature and value of the asset in establishing procedures for setting a schedule of assets that would or would not be used in calculating Income-Adjusted Rents. The President

and Chief Executive Officer as approved by the AHA Board of Commissioners is authorized to approve revisions to the schedule of Standard Income Deductions and revisions to the treatment of assets. If it is determined that the implementation of any such revision could adversely impact Tenant Rent, as defined below in Section 4, AHA will conduct a Rent Burden Analysis, which would require AHA Board of Commissioners approval before implementation.

3. In determining annual household income, Atlanta Housing Authority will disregard the employment income of an Elderly Person or Disabled Person whose primary source(s) of income are Social Security, SSI, and/or other similar fixed income received from a verified plan (“Annual Fixed Income”). For those cases in which the Annual Fixed Income is not the primary source of income, Atlanta Housing Authority, in its discretion, may establish a limit on the amount of employment income that may be disregarded. Any employment income that is not disregarded will be included in annual household income for purposes of calculating Total Tenant Payment, as defined below in Section 4. The definition of a Disabled Person in this context is consistent with HUD’s definition of a “person with disabilities” for program eligibility purposes, and is set forth above in Article Eight. This policy is applicable to all AHA Rental Assistance Programs and serves as the replacement for any applicable HUD rules and regulations. AHA, in its discretion, may establish reasonable verification procedures and documentation requirements to ensure program integrity.
4. The rent payable by an AHA-Assisted Household to Atlanta Housing Authority or the Owner of a Covered Unit is the net tenant rent to owner (“Tenant Rent”). The Tenant Rent is derived by subtracting the allowances for tenant-paid utilities and certain services for the Covered Unit, if any, according to the AHA-approved schedule (“Utility Allowance Schedule”) from the AHA-Assisted Household’s AHA-determined monthly gross affordable rent (“Total Tenant Payment”). Determinations of the Tenant Rent and the Total Tenant Payment will be in accordance with the Operating Procedures established for the applicable Rental Assistance Program.
5. The Utility Allowance Schedule will be analyzed on a periodic and ongoing basis in order to identify any fluctuations and trends in the cost of utilities and certain services within Atlanta Housing Authority’s jurisdiction. If such analysis reveals an extraordinary increase in the cost of utilities and certain services that will have a discernible impact on AHA-Assisted Households, Atlanta Housing Authority will revise the Utility Allowance Schedule and implement it within a reasonable time frame in order to preserve housing affordability for AHA-Assisted Households. Such ongoing analysis notwithstanding, Atlanta Housing Authority will conduct a comprehensive review of the cost of utilities and certain services on an annual basis and issue a Utility Allowance Schedule each calendar year. Based on its ongoing review and analysis of the cost of utilities and certain services and allowance expenses, Atlanta Housing Authority will continue to examine strategies and policies that lead to cost-effective measures and operating efficiencies that will promote the sustainability of the applicable Rental Assistance Program.

6. In order to preserve housing affordability for all AHA-Assisted Households under any of AHA's Rental Assistance Programs, each AHA-Assisted Household, unless subject to Atlanta Housing Authority's minimum rent as defined below in Section 7, will pay no less than 30% of the household's monthly adjusted income for rent, utilities and certain services in determining the applicable Tenant Rent, but no more than a reasonable percentage of the AHA-Assisted Household's monthly adjusted income ("Rent Burden"), as determined by a Rent Burden Analysis of all AHA-Assisted Households in AHA's Rental Assistance Programs. Any change in the Tenant Rent based on the Rent Burden Analysis must be reviewed and approved by the AHA Board of Commissioners prior to implementation.
7. AHA-Assisted Households must pay a minimum rent as determined and approved by Atlanta Housing Authority ("Minimum Rent"). AHA may revise its Minimum Rent and establish it as a Total Tenant Payment or Tenant Rent, as these terms are defined above in Section 4 of this Article Ten. A new Minimum Rent will not go into effect until a Rent Burden Analysis has been conducted and approved by the AHA Board of Commissioners and all AHA-Assisted Households have been provided advance notice of the effective date of the new Minimum Rent.
 - A. The Minimum Rent requirement may not apply to Elderly Families and Disabled Families as defined above in Article Seven.
 - B. An AHA-Assisted Household who has previously paid but later becomes unable to pay the Minimum Rent, due to extraordinary financial distress, may request "Hardship Consideration."
 - C. An AHA-Assisted Household may be eligible for Hardship Consideration when any one of the following circumstances is present: (i) the AHA-Assisted Household has lost eligibility or is waiting an eligibility determination for a Federal, State or local assistance program; (ii) the income of the AHA-Assisted Household has decreased because of extraordinary changed circumstances, including layoff from a job; or (iii) such other extraordinary circumstances as Atlanta Housing Authority or the Owner of the Covered Unit may determine.
 - D. Atlanta Housing Authority or the Owner of the Covered Unit shall promptly investigate any request for Hardship Consideration and take appropriate actions based on this investigation to determine whether the AHA-assisted household is experiencing an actual hardship situation and that the AHA-Assisted Household is otherwise in compliance with its obligations under the applicable Rental Assistance Program. Such actions resulting from such determination may include, but not be limited to:
 - i. Temporary suspension of the entire Minimum Rent under such terms as Atlanta Housing Authority shall direct. Such suspensions shall not last greater than ninety (90) days unless otherwise extended upon the written request of the AHA-Assisted Household based on verifiable circumstances reasonably affecting the AHA-Assisted Household's ability to pay the Minimum Rent.

The period of the temporary suspension may be extended by the Atlanta Housing Authority or the Owner of the Covered Unit after supervisory review and documented approval of the request;

- ii. Accelerated enrollment in one of Atlanta Housing Authority's approved human development program components;
 - iii. Referral to third party agencies who assist households with the payment of rent; and
 - iv. Such other actions as Atlanta Housing Authority or the Owner of the Covered Unit shall direct.
- E. The AHA-Assisted Household will not be required to pay Minimum Rent arrearages that accumulated during the entire period of a temporary suspension of the Minimum Rent due to an approved Hardship Consideration.
8. If any member of an AHA-Assisted Household loses, quits, leaves, resigns, is terminated or fired from her or his job or loses her or his welfare benefit, the AHA-Assisted Household shall continue to pay the Tenant Rent based on the AHA-Assisted Household member's prior employment income or welfare benefit status. If any such member can provide third party verification satisfactory to the Management Agent that loss of employment or welfare benefit was due solely to a reason beyond her or his control (e.g. reduction-in-force) or other independent action, as applicable, the AHA-Assisted Household will receive consideration for a reduction in Tenant Rent resulting from the change in income due to the loss of employment or loss of benefit.

ARTICLE TWELVE.

RECERTIFICATION

- 1. Atlanta Housing Authority, the Owner or Management Agent of the Covered Unit, as applicable, will reexamine the income, family composition and program compliance of each AHA-Assisted Household on a periodic basis, whether annually, on an interim basis or over some longer interval of time, in accordance with the authorizations under the MTW Agreement and as set forth in the Operating Procedures ("Recertification").
- 2. Atlanta Housing Authority may determine at Recertification whether an AHA-Assisted Household is over-income and whether such household is eligible for continued assistance. Criteria for determining over-income AHA-Assisted Households pursuant to Atlanta Housing Authority requirements will be set forth in the Operating Procedures.
- 3. In order to streamline the Recertification process, Atlanta Housing Authority or the Owner of the Covered Unit may accept a "Recertification Self-Certification" from an AHA-Assisted Household for any one or more of the Recertification criteria set forth in Section 1 of this Article Twelve.
- 4. Recertification requirements and the obligations and responsibilities of AHA-Assisted Households with respect to such requirements are set forth in various written communications and guidelines in accordance with the Operating Procedures.

ARTICLE
THIRTEEN.

SPECIAL PROGRAMS, POLICIES AND STRATEGIC INITIATIVES

Atlanta Housing Authority, in its discretion, may establish special programs, special admissions policies, operational protocols and/or strategies designed to address economic, human development or self-sufficiency programs, MTW initiatives, pilot programs, safe and secure community enhancements, the use of bona fide law enforcement agencies or personnel, and homeownership opportunities. Written procedures and processes developed for any special program, policy and/or strategy must be approved by AHA and/or authorized by the President and Chief Executive Officer for implementation and/or inclusion in the MTW Annual Plan.

ARTICLE
FOURTEEN.

ECONOMIC SELF-SUFFICIENCY

1. Atlanta Housing Authority, in its discretion, may explore strategies that recognize the progression of AHA-Assisted Households toward economic self-sufficiency which may lead to their graduation from a Rental Assistance Program.
2. HUD established the Community Service and Self-Sufficiency Requirement (CSSR) which would require unemployed AHA-Assisted Household members (ages 18 – 61 who are not receiving TANF benefits, exempt from work requirements, engaged in work activities or unable to comply because of a disability) to contribute the HUD-specified number of hours each month to community service or an economic self-sufficiency program. AHA's Work Requirement, as set forth above in Article Ten, applies to its Rental Assistance Programs instead of HUD's CSSR.
3. Each AHA-Assisted Household is responsible for ensuring that any school age member who is under 18 years of age attends school on a regular basis in accordance with local school board policies and state law. Upon the request of Atlanta Housing Authority, an Owner Entity or Management Agent, the AHA-Assisted Household must provide such information, releases and authority to verify compliance and the attendance status of any such school age member of the AHA-Assisted Household.
4. If it is determined that any school age member of the AHA-Assisted Household who is under 18 years of age is not attending school on a regular basis or who has not completed her/his secondary education, such school age member will be required to attend school on a regular basis or enroll or reenroll, as applicable in and attend an accredited public or private secondary academic or technical school. The AHA-Assisted Household must provide to Atlanta Housing Authority, the Owner Entity or the Management Agent such information, releases and authority to verify compliance and the attendance status of any such school age member of the AHA-Assisted Household.
5. Any member of an AHA-Assisted Household who is subject to the Work Requirement and is not working full-time may be required to enroll and satisfactorily participate in an AHA-recognized economic independence program, and if such economic independence program is not a full-time program, such member of the AHA-Assisted Household shall be required to have part-time employment.

6. Any member of an AHA-Assisted Household who is subject to the Work Requirement, regardless of such member's work status (full or part-time employment), may be required to participate in an AHA-recognized economic and life-style initiative that has as one of its components, the completion of an approved planning document, which charts out a path towards economic, and life-style independence and devises strategies to address any barriers confronting the member of the AHA-Assisted Household.
7. Having eliminated the federal earned income disallowance for AHA-Assisted Households paying an Income Adjusted Rent, Atlanta Housing Authority, in its discretion, may implement an Individual Development Account initiative as an approved MTW activity ("IDA Initiative"), which would promote and encourage personal economic independence among AHA-Assisted Households through a monetary incentive program.
 - A. The IDA Initiative would be linked to meaningful capacity-building initiatives offered by a variety of organizations and institutions in Atlanta. A mechanism would be created for eligible AHA-Assisted Households that would allow them to accrue a portion of their rental payments, as determined by Atlanta Housing Authority, and set aside in a separate IDA.
 - B. To fulfill the eligibility requirements of the program, participating AHA-Assisted Households would be required to participate in an AHA-approved personal human development program that sets economic independence milestones.
 - C. AHA-Assisted Households that achieve the self-sufficiency and economic independence milestones would be eligible for reimbursement of IDA funds. Those who do not achieve their milestones would not be eligible for the IDA initiative nor would they be eligible to receive a reimbursement of any portion of the funds in the IDA account.

ARTICLE FIFTEEN.

CRIMINAL HISTORY SCREENING

Applicants to AHA's Rental Assistance Programs and AHA-Assisted Households under one of AHA's Rental Assistance Programs may either be denied admission to or terminated from the Rental Assistance Program, as applicable, if any of their household members are or have been engaged in criminal activity that could reasonably be expected to indicate a threat to the health, safety or welfare of others, including other residents, and the agents and employees of Atlanta Housing Authority, Owners, and/or Management Agents. An arrest record alone may not provide sufficient evidence of disqualifying conduct. However, an arrest record can trigger an inquiry into whether a person engaged in disqualifying criminal activity. Additional evidence, such as law enforcement reports detailing the circumstances of the arrest, witness statements and other relevant documentation, may be used to assist in making a determination that the disqualifying conduct occurred. Reliable evidence of a conviction for criminal conduct that would disqualify an individual for tenancy (such as a background report from a reliable source) or an admission by the offender may also be the basis for determining that the disqualifying conduct occurred.

1. OFFENSES SPECIFICALLY IDENTIFIED BY HUD

- A. Pursuant to 24 CFR § 960.204 and 24 CFR § 982.553 according to the applicable subsidy program, Applicants may be denied admission if any member of their households:
- i. Has been evicted from federally assisted housing for drug-related criminal activity within the three year period preceding application;
 - ii. Is currently engaging in the illegal use of drugs;
 - iii. Has ever been convicted of drug-related criminal activity for manufacture or production of methamphetamine on the premises of federally assisted housing;
 - iv. Is subject to a lifetime registration requirement under a State sex offender registration program; or
 - v. Is abusing or demonstrates a pattern of abuse of alcohol that may threaten the health, safety, or right to peaceful enjoyment of the premises by other residents.
- B. An AHA-Assisted Household may also be subject to termination or non-renewal of tenancy if, subsequent to admission, Atlanta Housing Authority determines that any of the statements included in Paragraph A above were applicable to an AHA-Assisted Household at the time of admission.

2. VIOLENT OR DRUG-RELATED OFFENSES

Applicants may be denied admission and AHA-Assisted Households may be subject to termination or non-renewal of tenancy if any member of their households is determined to be engaged in any Violent or Drug-Related Offenses. Examples of Violent or Drug-Related Offenses include, but are not limited to, the following:

- A. Homicide, Murder, Voluntary Manslaughter;
- B. Rape, Sexual Battery, other Aggravated Sex-Related Crimes;
- C. Child Molestation, Child Sexual Exploitation;
- D. Drug Charges;
- E. Kidnapping, False Imprisonment;
- F. Terrorism;
- G. Arson;
- H. Possessing, Transporting or Receiving Explosives or Destructive Devices with the Intent to Kill, Injure, Intimidate or Destroy;

- I. Assault and Battery (Simple and Aggravated);
- J. Trafficking, Distribution, Manufacture, Sale, Use, or Possession of Illegal Firearms;
- K. Carjacking;
- L. Robbery;
- M. Hate Crimes;
- N. Criminal Damage to Property Endangering Life, Health and Safety;
- O. Aiding and Abetting in the Commission of a Crime Involving Violence; and
- P. Other Violent or Drug-Related Offenses that may Pose a Threat to Public Health and Safety.

3. OTHER CRIMINAL OFFENSES (Not Violent or Drug-related)

Applicants may be denied admission if any member of their households have, within the five-year period preceding application, been determined to have been engaged in any other criminal offenses that do not involve violence or drugs. An AHA-Assisted Household may be subject to termination or non-renewal of tenancy if any member of their households is determined to have been engaged in any other criminal offenses that do not involve violence or drugs. Examples of Other Criminal Offenses (not violent or drug-related) include, but are not limited to the following:

- A. Child Neglect;
- B. Disorderly Conduct;
- C. Motor Vehicle Theft;
- D. Burglary, Larceny, Receiving Stolen Goods;
- E. Prostitution and Solicitation of Prostitution;
- F. Vandalism; and
- G. Other Offenses that may Pose a Threat to Public Health and Safety but do not involve Violence or Drugs.

4. ADVERSE CRIMINAL HISTORY DECISIONS

Prior to an adverse decision based on criminal activity, affected applicants and AHA-Assisted Households will receive notification of the proposed adverse decision and will receive an opportunity to dispute the accuracy and relevance of a criminal record. The dispute processes for adverse criminal history decisions are set forth in the Program-Specific Policies in Chapters 2 and 3 of this Statement of Corporate Policies.

ARTICLE
SIXTEEN.

FRAUD AND MISREPRESENTATION

1. Applicants to AHA's Rental Assistance Programs and AHA-Assisted Households under one of AHA's Rental Assistance Programs are required to provide truthful, complete information to Atlanta Housing Authority, Owners and Management Agents, including but not limited to information relating to participation in other housing subsidy programs, income from all sources, employment status of all household members, household composition, criminal history and other requested household background information to qualify for initial eligibility and continued residency in an Covered Unit.
2. Such Applicants and AHA-Assisted Households who engage in acts of fraud and misrepresentation are subject to loss of program benefits, reimbursement of subsidy assistance, and prosecution under State and Federal laws, and where appropriate, will be referred for such prosecution by Atlanta Housing Authority, an Owner and/or a Management Agent.
3. In addition, such Applicants and AHA-Assisted Households who have made any intentional misrepresentation, or who have omitted or misrepresented material information, at the time of admission, during any subsequent recertification and/or lease renewal, or at any other time shall be denied admission or be subject to termination or non-renewal of tenancy, as applicable. Such Applicants and AHA-Assisted Households will be afforded the right to an informal review or hearing, as applicable, pursuant to this Statement of Corporate Policies.

ARTICLE
SEVENTEEN.

RESPONSE TO FEDERALLY DECLARED DISASTERS

In order to respond to federally declared disasters and other federally declared emergencies Atlanta Housing Authority may provide disaster or other emergency relief utilizing Vouchers on a funding availability and resource allocation basis.

1. The President and Chief Executive Officer is authorized to develop an agency-wide disaster or other emergency relief plan to address the needs arising from a disaster or other emergency in a strategic, meaningful, and effective manner pursuant to applicable rules, regulations, emergency legislation, and Executive Orders.
2. The President and CEO is further authorized to take any action that the President and CEO may deem necessary and appropriate pursuant to federal disaster relief authorizations applicable to housing programs within the scope of the resources available to Atlanta Housing Authority, and to waive Atlanta Housing Authority's administrative policies governing the Program related to intake procedures including but not limited to establishing a preference for disaster victims on waiting lists for the Program, rent collections, subsidy payments, work program compliance, and other related and relevant administrative policies.
3. The President and CEO will provide the Board of Commissioners with a full report on a disaster or emergency relief plan implemented pursuant to this Article Seventeen.

[END OF CHAPTER 1]

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CHAPTER 2

AHA-ASSISTED UNIT POLICIES

PART I - INTRODUCTION

ARTICLE ONE.

GENERAL POLICY REQUIREMENTS

The General Policy Requirements for Rental Assistance Programs set forth in Chapter 1 are applicable to this Chapter 2 which covers the Program-Specific Policies for AHA-Assisted Units.

ARTICLE TWO.

AHA-ASSISTED UNIT

1. Any residential unit that receives either public housing operating subsidy or project based rental assistance, regardless of the ownership structure of the community in which the residential unit is located, is referred to as an “AHA-Assisted Unit.”
2. Atlanta Housing Authority-owned public housing developments with AHA-Assisted Units are referred to as AHA-Owned Residential Communities (“AHA-Owned Communities”).
3. Privately-owned market-rate, mixed-income communities with a percentage of AHA-Assisted Units receiving public housing operating subsidy under Section 9 of the 1937 Housing Act, as amended, are referred to as AHA-Sponsored Mixed-Income, Mixed-Finance Residential Communities (“MIMF Communities”).
4. Privately-owned market rate, mixed income communities with a percentage of AHA-Assisted Units receiving project based rental assistance under Section 8 of the 1937 Housing Act, as amended, are referred to as Project Based Rental Assistance Communities (“PBRA Communities”). PBRA, as designed and implemented by Atlanta Housing Authority using its MTW flexibility and authorizations, differs from the HUD regulations at 24 CFR, Part 983 for the Project-Based Voucher (PBV) Program. In the event there should be any conflict between the policies and procedures of the AHA PBRA program and HUD PBV program requirements, AHA will adhere to the AHA PBRA policies and procedures, which include, but are not limited to, policies and procedures for the form of PBRA agreement, rent setting, site-based administration, site-based waiting lists and the percentage of units in a PBRA Community that can be project-based. Atlanta Housing Authority may project-base, without limitation, any number of its authorized units under the Housing Choice Program.
5. In some cases, both public housing operating subsidy and PBRA may be present in a MIMF Community. In general, MIMF Communities and PBRA Communities are owned by a limited partnership or similar ownership structure (“Owner Entity”) and are independently operated by the Owner Entity’s managing general partner and professional management company.

6. With respect to the deal structure for the development of these communities, Atlanta Housing Authority may or may not be a sponsor, co-developer, lender and/or holder of a ground lease on the real estate. Finally, AHA-Assisted Units in these communities may also be a low income housing tax credit unit ("LIHTC Unit").

ARTICLE THREE. MANAGEMENT AND ADMINISTRATION

1. For the purpose of this Chapter 2 of this Statement of Corporate Policies, a private management company that manages an AHA-Owned Community, MIMF Community or PBRA Community is referred to as "Management Agent."
2. Atlanta Housing Authority and its Management Agents are responsible for developing and implementing written operating procedures for the AHA-Owned Communities that are consistent with this Statement of Corporate Policies.
3. Owner Entities and their respective Management Agents are responsible for developing and implementing written operating procedures for the MIMF and PBRA Communities that are consistent with this Statement of Corporate Policies and to the requirements of other funding sources to the extent that MIMF and PBRA Communities may be subject to stricter requirements. Such operating procedures are subject to review by Atlanta Housing Authority with respect to the intent of any related policies and requirements. Atlanta Housing Authority will require the Owner Entity to revise any operating procedure that conflicts with the governing agreement between Atlanta Housing Authority and the Owner Entity for the property.
4. For the purpose of this Chapter 2 of the Statement of Corporate Policies the operating procedures under Sections 2 and 3 above are referred to as "Management Operating Procedures."
5. Project Based Rental Assistance is administered independent of and separate from the Housing Choice Tenant-Based Voucher Program. Atlanta Housing Authority may not enter into Housing Choice Rental Assistance Agreements for Housing Choice Tenant-Based Vouchers in a property that is under an executed PBRA Agreement or a written commitment to enter into a PBRA Agreement, unless authorization is otherwise granted.
6. The administrative requirements for PBRA are set forth in the Atlanta Housing Authority's Administrative Plan Governing Project Based Rental Assistance, as amended, and any successor document adopted by the Atlanta Housing Authority, including any policies and procedures provided to the Owner Entity by the Atlanta Housing Authority for purposes related to the administration of PBRA.
7. An AHA-Owned Community or MIMF Community undergoing a subsidy conversion from Section 9 to Section 8 of the Act through the Rental Assistance Demonstration ("RAD") will follow Atlanta Housing Authority's PBRA policies and procedures unless otherwise prohibited by HUD pursuant to RAD requirements not subject to waiver.

ARTICLE FOUR.

APPLICABILITY OF POLICIES TO APPLICANTS AND RESIDENTS

The Statement of Corporate Policies applies to all Applicants and members of the Applicant households, and Residents and members of the Resident households who have applied for or reside in an AHA-Assisted Unit, as applicable. The singular use of the terms “Applicant” and “Resident” shall be deemed to include all household members for the purposes of this Statement of Corporate Policies.

ARTICLE FIVE.

SITE-BASED WAITING LIST POLICY

1. The Site-Based Waiting List Policy established the equitable and consistent administration of independent site-based waiting lists at each AHA-Owned Community, MIMF Community and PBRA Community. A single site-based waiting list will serve any MIMF Community or PBRA Community that may be comprised of one or more development phases. This policy provides for the fair and equitable selection of eligible and qualified Applicants from a community waiting list rather than from a centralized pool. Although an Applicant can lease only one AHA-Assisted Unit, Applicants have the freedom to submit applications to the site-based waiting list of the community or communities of their choice, provided the site-based waiting list is open and receiving applications.
2. The implementing protocols for the administration of site-based waiting lists are memorialized as separate policy documents approved by HUD and are hereby included, by reference, in this Statement of Policies. In addition, AHA’s MTW Agreement states that AHA will continue to operate site-based waiting lists in accordance with the existing HUD-approved policies and provides further that AHA, at its option, has the authority to develop and administer other site-based waiting lists to address various situations.

ARTICLE SIX.

REASONABLE ACCOMMODATIONS

1. Atlanta Housing Authority’s Reasonable Accommodation General Policy is set forth in Chapter 1, Article Five of the Statement of Corporate Policies.
2. Atlanta Housing Authority and Owner Entities through their respective Management Agents have (i) set forth the process for Applicants and Residents who participate in programs in AHA-Owned Communities and/or MIMF and PBRA Communities to request reasonable accommodations; (ii) provided forms for individuals to request reasonable accommodations; (iii) set forth specific procedures regarding the acceptance, processing and disposition of reasonable accommodations requests, including target timeframes; and (iv) provided formal appeal/grievance procedures for individuals who have been denied reasonable accommodations. Persons with disabilities who require a Reasonable Accommodation because of a disability, or persons making a request on behalf of a person with disabilities should submit a request to the Management Agent, preferably using the request forms the Management Agent provides in order to simplify processing; however, use of specific forms is not required. The requester may be asked to provide verification of the need for the accommodation from a doctor or other professional who has direct knowledge of the subject disability if the need for the request is not obvious to the Management Agent. The

verifier will be asked to provide reliable verification that the person seeking the accommodation is a person with disabilities and the person needs the accommodation to afford an equal opportunity to participate in or benefit from the subject Atlanta Housing Authority program.

3. As a component of Atlanta Housing Authority's reasonable accommodation efforts, Atlanta Housing Authority will advise Applicants and Residents, employees and, to the extent applicable, members of the public of the Applicants' and Residents' right to effective communication in programs, services and activities. Management Operating Procedures will provide that:
 - A. Interested persons, including persons with hearing, visual or cognitive disabilities, can obtain information concerning the existence and location of accessible services, activities, and facilities;
 - B. Atlanta Housing Authority, Owner Entities, or Management Agents, as applicable, shall furnish appropriate auxiliary aids and services, where necessary, to afford a person with disabilities an equal opportunity to participate in programs, services and activities. In determining what auxiliary aids are necessary, Atlanta Housing Authority, Owner Entities, or Management Agents shall give primary consideration to the requests of the person with disabilities unless doing so would result in a fundamental alteration of programs or activities, or an undue financial and administrative burden; and
 - C. Residents and Applicants are aware of alternative, non-written methods to request a reasonable accommodation and the availability of forms and information in alternative formats.

ARTICLE SEVEN. PRIVATE SECTOR INNOVATION

In order to take advantage of private sector innovation, Atlanta Housing Authority may make available to the Owner Entities of MIMF and PBRA Communities the least restrictive regulatory requirements to achieve goals in accordance with the MTW Annual Plan. Owner Entities may engage in innovative activities in developing and implementing management practices and streamlined processes; higher community standards; and quality of life initiatives in order to create quality living environments.

1. Owner Entities are authorized, subject to the approval of the Atlanta Housing Authority, to create, adopt and implement their own occupancy, leasing and rent policies for Residents and eligible Applicants with respect to their communities.
2. Innovative policies and procedures could include, but are not limited to, new rent structures such as affordable fixed rents; standard deductions; application and waiting list procedures; eligibility and/or suitability criteria; meaningful economic independence milestones; and term limits.
3. Such innovative policies and procedures, once approved by Atlanta Housing Authority, will supplement and will not be considered in conflict with this Statement of Corporate Policies and Atlanta Housing Authority's requirements for AHA-Assisted Units.

PART II – APPLICANT AND RESIDENT SUITABILITY

ARTICLE ONE.

DETERMINING CRITERIA

1. An Applicant desiring to lease an AHA-Assisted Unit must first demonstrate all of the following:
 - A. Applicant meets one of the definitions of Family and is an eligible low-income household based on total annual household income pursuant to and verified according to U. S. Department of Housing and Urban Development (“HUD”) rules and regulations and as provided in Atlanta Housing Authority’s MTW Annual Plan;
 - B. Applicant satisfies HUD’s statutory and regulatory requirements for citizenship/eligible immigrant status;
 - C. Each school-age member of the Applicant’s household who is under 18 years of age and who has not completed her/his secondary education may be required to enroll and attend an accredited public or private secondary academic or technical school;
 - D. Applicant would be a suitable Resident based on past satisfactory behavior including, but not limited to, housekeeping performance, acceptable payment records for rent and/or utilities (as applicable), acceptable credit history, acceptable criminal background record, and a commitment to abide by the Dwelling Lease offered to eligible Applicants (the “Lease”); and
 - E. Compliance with Atlanta Housing Authority’s Work Requirement.
2. A Resident of an AHA-Assisted Unit must continue to demonstrate compliance with all eligibility and suitability requirements for admission and continued program participation, all Lease requirements, apartment rules and other program requirements throughout the Resident’s tenancy.
3. All Applicants must certify at application, and Residents must certify at recertification, that they have the ability to comply with all requirements of the Lease and such other related certifications as deemed appropriate by Atlanta Housing Authority.

ARTICLE TWO.

INITIAL LEASING CONSIDERATIONS

1. An Applicant desiring to lease an AHA-Assisted Unit must apply at the community or communities of the Applicant’s choice.
2. An Applicant, if eligible, will be placed on the applicable site-based waiting list for the community or communities.
3. Certain communities with AHA-Assisted Units may require Applicants to pay a non-refundable application fee, which, in the Management Agent’s discretion, may be applied to the Applicant’s security deposit, provided the Applicant is offered and accepts the offer of an AHA-Assisted Unit.

4. Applicants must provide all information on all household members requested in the application for admission on the form in use by the Management Agent.
5. The application for admission will give persons with disabilities the opportunity to (i) specify whether they need a unit with accessible features and describe the necessary accessibility features they require; (ii) specify if they require reasonable accommodation(s) in their housing and/or during the application process; and (iii) request a copy of Atlanta Housing Authority's Reasonable Accommodation Policy.
6. Application information available to Applicants will include the name and contact information of the Management Agent for each community, and the name and contact information of Atlanta Housing Authority's Section 504/ADA Coordinator, including the TDD/TTY number or Georgia Relay Service telephone number.

ARTICLE THREE. APPLICANT SELECTION POLICIES

Applicants for AHA-Assisted Units will be placed on the applicable site-based waiting list in accordance with the requirements as set forth below.

1. Order of Applicant selection for communities where the Resident population is comprised of Elderly Persons, Almost-Elderly Persons (as this term is defined below) and/or Non-Elderly Disabled Persons (as this term is defined below):
 - A. To be considered for a community for Elderly, Disabled, Almost-Elderly and/or Non-Elderly Disabled Persons, an Applicant must be a household comprised of members in one or more of the following categories:
 - i. An Elderly Person;
 - ii. An Almost Elderly Person who is 55-61 years of age;
 - iii. A Disabled Person who is either an Elderly Person or Almost Elderly Person
 - iv. A Non-Elderly Disabled Person who, for the purpose of this admission policy under the following subsection B, is a Disabled Person who is less than 55 years of age.

Applicants who do not qualify as outlined above are not eligible for admission.

- B. Atlanta Housing Authority pursuant to its MTW Annual Plan will strive to achieve an optimal balance of Elderly, Almost Elderly, and Non-Elderly Disabled Residents in senior communities that do not have a designation pursuant to paragraph C of this Section. The Management Agents of such communities shall be permitted to admit applicants from the waiting list at a ratio of four (4) Elderly and

Almost Elderly Applicants to one (1) Non-Elderly Disabled Applicant
in order to achieve the optimal balance.

- C. Atlanta Housing Authority in accordance with its Moving to Work Annual Plan may designate up to 100% of the AHA-Assisted Units in a community for Elderly, Almost Elderly, Disabled or Non-Elderly Disabled Persons, as applicable and appropriate.
- D. In the event there is an insufficient number of Elderly and Almost Elderly Applicants to admit to AHA-Assisted Units pursuant to paragraphs B and C above, Atlanta Housing Authority may, in its sole discretion, exercise its authority to permit Elderly and/or Almost Elderly Applicants on the Housing Choice Program waiting list to be selected for screening and admission, if approved, to a senior community with AHA-Assisted Units.
- E. The definition of a Disabled Person in the context of this Article Three of Chapter 2 is consistent with HUD's definition of a "person with disabilities" for program eligibility purposes as set forth in Article Eight of Chapter 1.

ARTICLE FOUR

GENERAL CONSIDERATIONS FOR APPLICANT SELECTION FROM A SITE-BASED WAITING LIST

- 1. To be eligible for selection, an Applicant's eligibility and qualifications must be verified through appropriate documentation as reasonably required by the Management Agent in the Management Operating Procedures.
- 2. An Applicant's placement on or selection from a site-based waiting list at an AHA-Owned Community, MIMF Community and/or PBRA Community shall be based on either the date-and-time of application or a random method such as a lottery, as determined by the Management Agent in accordance with the Statement of Corporate Policies and the Management Operating Procedures. In either case, to the extent that either a current Resident or eligible Applicant requires the accessibility features of an available Uniform Federal Accessibility Standards Unit ("UFAS-Accessible Unit"), the requirements in Article Five of this Part II will take precedence in the order of selection.
- 3. The site-based waiting list will be opened following a public notice which will contain the following information:
 - A. Location of the AHA-Owned Community, MIMF Community and/or PBRA Community where applications may be placed;
 - B. Availability of AHA-Assisted Units by bedroom size;
 - C. References to basic eligibility criteria for Applicants including Special Qualifications, as applicable;
 - D. Method of Selecting Applications (date and time of application, or by a random method such as a lottery);

- E. Fair Housing Logo or statement; and
 - F. Accessibility Logo or statement.
4. If the public notice does not include the closing date of the site-base waiting list then a separate public notice must be published to announce the closing date of the site-based waiting list.
 5. The Management Agent will ensure that the opening and/or closing of a site-based waiting list will be published in selected newspapers of general public circulation, including minority and foreign language newspapers (for persons with LEP) that may be available to potential Applicants in order to ensure fair and equitable marketing efforts. The selection of such newspapers will be in accordance with the Management Operating Procedures and/or Affirmatively Furthering Fair Housing marketing plan, as applicable.
 6. The method used in ranking Applicants on the site-based waiting list for an AHA-Assisted Unit determines the organization of Applicants on the site-based waiting list. Applicants ranked by date-and-time of application will be organized according to bedroom size eligibility whereby the application with the earliest date-and-time will be first. Applicants ranked by lottery will be organized according to bedroom size eligibility in sequential numerical order, first to last, of the random selection. In the case of the reoccupancy of a revitalized community, eligible returning residents of the former public housing project will be placed on the applicable site-based waiting list and given first consideration as Applicants for an AHA-Assisted Unit prior to any consideration given to other Applicants who were placed on the applicable site-based waiting list according to a public notice.
 7. The maintenance of a site-based waiting list with respect to updating applications, notice letters, and non-responsive files will be detailed in the Management Operating Procedures.
 8. Atlanta Housing Authority's fair and equitable "Site-Based Waiting List Policy" for AHA-Assisted Units strengthens the concepts of community building and housing choice. Based on available housing opportunities, Applicants choose communities according to location, amenities, job opportunities, schools, and neighborhoods. The result is a policy approach that supports the deconcentration of poverty.
 9. General Consideration for MIMF and PBRA Communities
 - A. At least five percent (5%) of all AHA-Assisted Units in Mixed-Income, Mixed-Finance and MIMF Communities will be available to eligible and qualified Applicants and Residents with disabilities who require the accessibility features of UFAS-Accessible Units, provided the AHA-Assisted Unit count remains within the limits established by the governing legal and financial agreements should the percentage exceed five (5%).
 - B. While still subject to the requirements of the Low Income Housing Tax Credit (LIHTC) program under Section 42 of the federal Internal Revenue Code, and in consideration of the expected income levels of

residents of apartments other than AHA-Assisted Units being contemplated by Owner Entities of MIMF and PBRA Communities with AHA-Assisted Units with LIHTC units, such Owner Entities are hereby permitted to manage admissions to an appropriate goal of a broad range of incomes whereby fifty percent (50%) of AHA-Assisted Units would be occupied by Resident families with incomes less than thirty percent (30%) of Area Median Income for the Atlanta-Sandy Springs-Marietta, Georgia MSA (adjusted for family size) and fifty percent (50%) by Resident families with incomes equal to or greater than thirty percent (30%) Area Median Income for the Atlanta, Georgia MSA (adjusted for family size).

ARTICLE FIVE.

ORDER OF SELECTION FOR UFAS-ACCESSIBLE UNITS

1. Atlanta Housing Authority identifies and prioritizes the needs of eligible Residents and Applicants who require the accessibility features of a UFAS-Accessible Unit in a centralized database according to the date and time of a Resident's transfer request, or the date and time or ranking by lottery, as applicable, of an Applicant's application. This database ("UFAS-Accessible Unit Database") maintains data on such Residents and Applicants for both the AHA-Owned Communities and MIMF or PBRA Communities.
2. Each AHA-Owned Community and each MIMF or PBRA Community will maintain a separate, site-based UFAS-Accessible Unit Waiting List ("UFAS Waiting List") for eligible Applicants and Residents with disabilities that require UFAS-Accessible Units.
3. The UFAS-Accessible Unit Database is established to provide:
 - A. Direct assistance to Residents and Applicants with disabilities, upon request, in identifying an available AHA-Assisted UFAS-Accessible Unit in any AHA-Owned Community or MIMF or PBRA Community;
 - B. A process for notifying and referring residents from the database to the AHA-Owned Communities and MIMF or PBRA Communities with openings on the respective site-based UFAS Waiting Lists;
 - C. A process for notifying and referring Applicants from the database to the AHA-Owned Communities and MIMF or PBRA Communities with openings on the respective site-based UFAS Waiting Lists; and
 - D. A method for monitoring the maximization of occupancy of AHA-Assisted Units that are UFAS-Accessible Units, in AHA-Owned Communities and MIMF or PBRA Communities, by Residents who require the accessibility features of those units.
4. When a UFAS-Accessible Unit becomes available in the appropriate bedroom size in an AHA-Owned Community, the Management Agent shall offer the UFAS-Accessible Unit as follows:
 - A. First, to a current Resident with disabilities in an AHA-Owned Community who is being relocated due to Atlanta Housing Authority

revitalization activities and who requires the accessibility features of the available UFAS-Accessible Unit;

- B. Second, to a current Resident with disabilities in the same AHA-Owned Community who requires the accessibility features of the available UFAS-Accessible Unit and is occupying a unit without those features;
 - C. Third, if there is no current Resident in the same AHA-Owned Community who requires the accessibility features of the available UFAS-Accessible Unit and wishes to reside in that unit, then it will be offered to an eligible, qualified current Resident with disabilities, according to date and time of transfer request, residing in another AHA-Owned Community, who requires the accessibility features of the available, UFAS-Accessible Unit and is occupying a unit without these features;
 - D. Fourth, if there is no current Resident in any AHA-Owned Community who requires the accessibility features of the vacant, UFAS-Accessible Unit and wishes to reside in that unit, then it will be offered to an eligible, qualified current Applicant with disabilities, according to date and time of application on the site-based waiting list of the same AHA-Owned Community who requires the accessibility features of the available UFAS-Accessible Unit;
 - E. Fifth, if there is no qualified Applicant on the site-based waiting list of the same AHA-Owned Community who requires the accessibility features of the vacant, UFAS-Accessible Unit, then it will be offered to an eligible, qualified Applicant with disabilities, according to date and time of application, on the site-based waiting list of another AHA-Owned Community who requires the accessibility features of the available, UFAS-Accessible Unit; and
 - F. Sixth, if there is not an eligible, qualified Resident or Applicant with disabilities in the AHA-Owned Communities who wishes to reside in the available, UFAS-Accessible Unit, then the unit may be offered to the next Applicant or Resident, according to the date and time of the transfer request or application, in the AHA-Owned Community who does not need the accessibility features of the unit. The occupying Resident will sign a lease or lease addendum that requires the Resident of any UFAS-Accessible Unit in an AHA-Owned Community who does not need the accessibility features of that unit to relocate, at no expense to the Resident, to a vacant, non-accessible unit within thirty (30) days of notice by the AHA-Owned Community when there is an eligible, qualified current Applicant or Resident with disabilities who requires the accessibility features of the unit.
5. When an AHA-Assisted Unit that is a UFAS-Accessible Unit becomes available in the appropriate bedroom size in a MIMF or PBRA Community, the Management Agent shall offer the UFAS-Accessible Unit to Residents and/or Applicants, as follows:
- A. First, to a current Resident with disabilities in the same MIMF or PBRA Community who requires the accessibility features of the

available, UFAS-Accessible unit and is occupying a unit without those features;

- B. Second, if there is no current Resident in the same MIMF or PBRA Community who requires the accessibility features of the vacant, UFAS-Accessible Unit and wishes to reside in that unit, then it will be offered to an eligible, qualified current Applicant for an AHA-Assisted Unit, according to date and time of application, on the site-based waiting list of the same MIMF or PBRA Community who requires the accessibility features of the available, UFAS-Accessible Unit;
- C. Third, if there is no qualified Applicant for an AHA-Assisted Unit on the site-based waiting list of the same MIMF or PBRA Community who requires the accessibility features of the vacant UFAS-Accessible Unit, then the MIMF or PBRA Community will coordinate with Atlanta Housing Authority's Section 504/ADA Coordinator for referrals from the AHA-Owned and MIMF or PBRA UFAS-Accessible Unit Database. If Atlanta Housing Authority identifies a current Resident or Applicant on the AHA-Owned and MIMF or PBRA UFAS-Accessible Unit Database, Atlanta Housing Authority shall refer the Resident or Applicant, according to date and time of transfer request or application, to the MIMF or PBRA Community; and
- D. Fourth, if there is no eligible, qualified Resident or Applicant with disabilities in the MIMF or PBRA Community or referred by Atlanta Housing Authority pursuant to a review of the AHA-Owned and MIMF or PBRA UFAS-Accessible Unit Database, who submits an application for the unit within a reasonable time period following receipt of a notice, then the unit may be offered to the next Applicant or Resident, according to date and time of transfer request or application, in the MIMF or PBRA Community who does not need the accessibility features of the unit. The occupying Resident will sign a lease or lease addendum that requires the Resident of any UFAS-Accessible Unit in a MIMF or PBRA Community who does not need the accessibility features of that unit to relocate, at no expense to the Resident, to a vacant, non-accessible unit within thirty (30) days of notice by the MIMF or PBRA Community when there is an eligible, qualified current Applicant or Resident with disabilities who requires the accessibility features of the unit.

ARTICLE SIX.

SCREENING OF APPLICANTS AND RESIDENTS

- 1. Applicants and Residents, at least 16 years of age or older, are subject to initial and ongoing screening to ensure that they can demonstrate their current and continued suitability as a Resident of a community with AHA-Assisted Units. Atlanta Housing Authority, the Owner Entity or Management Agent shall be responsible for: (i) screening household members 16 years old and over; and (ii) ensuring that all background information, including deductions and allowances, are properly verified.
- 2. Applicants shall undergo and complete the screening process prior to the offer of an AHA-Assisted Unit. Residents shall undergo and complete the

screening process annually, on an interim basis, or over some longer interval of time in accordance with the MTW Annual Plan.

3. Screening practices that are common and customary for the purpose of leasing apartments in the State of Georgia may be utilized including, but not limited to examination of landlord and dispossession records; review of past and current apartment management records; review of housekeeping performance based on a home visit; and requesting credit reports, utility records, and criminal background histories.
4. Applicants and Residents are required to execute authorization forms allowing Atlanta Housing Authority, Owner Entities and/or their respective Management Agents to conduct any background check, examination, or verification required for appropriate determinations under the initial or periodic reexamination process.
5. Applicants and Residents are required to cooperate with the Management Agent during the screening process by providing truthful, complete information relating to all income, household composition, criminal history background, and all other household background information.
6. An Applicant with an unsatisfactory screening report will be denied and sent a suitability denial notice. A Resident household with an unsatisfactory screening report will be subject to termination or nonrenewal of the Resident household's Lease.
7. Applicants and Residents with unsatisfactory screening reports will be presented with notice of denial, termination or non-renewal, as applicable, which will include a copy of any adverse report(s), where permitted, or reason(s), and the opportunity to dispute the accuracy and relevance of the adverse report(s) or reason(s). Applicants and Residents desiring to dispute such determinations, including those with adverse criminal history reports, may do so as set forth in the Statement of Policies, as applicable, based on the circumstances.
8. Atlanta Housing Authority, Owner Entities and Management Agents may share information with one another on the denial of admission of Applicants and the termination of Residents in order to avoid any duplication of effort and ensure the integrity of the screening process.

ARTICLE SEVEN.

DISPUTE PROCESS FOR ADVERSE CRIMINAL HISTORY DECISIONS

1. Atlanta Housing Authority, Owner Entities, and/or Management Agents may deny admission to Applicants or terminate or not renew the leases of Residents if any of their household members are or have been engaged in criminal activity that could reasonably be expected to indicate a threat to the health, safety or welfare of others, including other residents, and the agents and employees of Atlanta Housing Authority, Owner Entity, and/or Management Agent. An arrest record alone may not provide sufficient evidence of disqualifying conduct. However, an arrest record can trigger an inquiry into whether a person engaged in disqualifying criminal activity. Additional evidence, such as law enforcement reports detailing the circumstances of the arrest, witness statements and other relevant documentation, may be used to assist in making a determination

that the disqualifying conduct occurred. Reliable evidence of a conviction for criminal conduct that would disqualify an individual for tenancy (such as a background report from a reliable source) or an admission by the offender may also be the basis for determining that the disqualifying conduct occurred. Atlanta Housing Authority's Criminal History Screening Policy is set forth in Chapter 1, Article Twelve of this Statement of Corporate Policies.

2. ADVERSE CRIMINAL HISTORY DECISIONS

A. NOTICE: Denied Applicants and Residents for whom termination is proposed will receive a written notice outlining:

- i. The specific reasons for the denial or proposed termination;
- ii. The dispute process, including the opportunity to dispute the accuracy and relevance of the criminal record prior to the denial, termination or eviction; and
- iii. The opportunity for requesting reasonable accommodation in the dispute process for persons with disabilities.

B. Dispute Process Available to *Applicants Denied for Criminal History*

- i. **INFORMAL REVIEW:** Denied Applicants have the right to request an informal review by an impartial person designated by Atlanta Housing Authority, the Owner Entity and/or the Management Agent, as applicable, who did not have any prior role in processing the Applicant's application and who is not the subordinate of the person who made the initial decision. Informal reviews must be requested in writing within ten (10) days from the date of receipt of the denial notice. If the Applicant requires assistance with making a written request, the Applicant may come into the management office before the end of the ten (10) day period to request assistance with the written request. If the Applicant does not submit a written request for an informal review within this time period, the decision will be considered final.
- ii. **DOCUMENT REVIEW:** Prior to the informal review, a denied Applicant may request an opportunity to examine the application file and to copy any relevant documents at the Applicant's cost.
- iii. **WITNESSES AND REPRESENTATIVES:** The Applicant may bring witnesses, representatives (including attorneys) or letters of support to the informal review. In the event Atlanta Housing Authority, the Owner Entity and/or the Management Agent, as applicable, presents any witnesses, the Applicant will have a right to cross-examine them.
- iv. **DISPOSITIONS:** Denied Applicants are strongly encouraged to bring to the informal review a copy of the disposition of the criminal offenses which form the basis of the denial. If, however, a denied Applicant admits that he or she committed a crime, was

convicted of a crime or that he or she entered a guilty plea for the criminal offense in question, the Applicant will not need to provide additional information regarding a criminal conviction or a guilty plea. This does not mean, however, that an Applicant who admits to committing a crime, was convicted of a crime or entered a guilty plea will not be allowed to discuss the circumstances or any of the review considerations set forth below if he or she wants the Management Agent to consider such additional information.

- v. REVIEW CONSIDERATIONS: At the informal review, a denied Applicant may present, and Atlanta Housing Authority, Owner Entity and/or Management Agent, as applicable will consider, evidence of the following:
 - a. Circumstances: Circumstances of the criminal case(s) and mitigating or aggravating circumstances;
 - b. Conduct: The time, nature and extent of the Applicant's conduct (including the severity of the conduct and the seriousness of the offense);
 - c. Future Danger: Whether the conduct indicates that the Applicant would pose a danger to the health, safety or welfare of others (including other residents, the agents and employees of Atlanta Housing Authority, Owner Entity, and/or Management Agent); whether the Applicant has been rehabilitated so as not to pose such a danger; and other facts which would prevent the Applicant from posing a danger.
 - vi. REVIEW DECISIONS: A written review decision should be provided to the denied Applicant within ten (10) days following the informal review or, if the reviewer requested additional information from the Applicant, within ten (10) days following the date the information was submitted, or was due if not submitted, whichever comes first. If the reviewer's decision is to deny the application, the decision shall set forth the reasons for the denial in detail.
- C. Residents subject to Lease termination who desire to dispute the accuracy and relevance of the criminal history information may do so as set forth in Part III, Article Six: "Disputing Decisions of Manager."
- D. Applicants who desire to dispute decisions to deny their applications *for reasons other than criminal history* may do so as set forth in Part III, Article Six: "Disputing Decisions of Manager."

PART III - RESIDENT BENEFITS AND OPPORTUNITIES

ARTICLE ONE.

RENT STRUCTURES AND RELATED POLICIES

- 1. Residents are required to pay Rent according to the instructions provided by the Management Agent pursuant to the terms of the Lease.

2. Atlanta Housing Authority may, from time to time, establish various rent structures that will combine the Rent charged to Residents with the budgeted federal subsidy in order to balance affordability and operating expenses to ensure that the financial obligations of each community with AHA-Assisted Units are covered.
3. Rent structures will be evaluated on a property-by-property basis with the goal of using the rent structure that best positions the individual community to remain self-sustaining. The appropriate rent structure for each community with AHA-Assisted Units may be established by using one of the following income-based and non-income-based approaches:
 - A. “Income Adjusted Rent” is the standard rent structure that applies a pre-determined percentage of the Resident’s adjusted household income to calculate the Total Tenant Payment. Unless otherwise exempted pursuant to Chapter 1, Article Eleven, Section 7 of this Statement of Corporate Policies, Residents paying an Income Adjusted Rent are subject to the Minimum Rent requirements.
 - B. “Flat Rent” is a standard non-income-based rent structure established in accordance with HUD rules and regulations that uses the fair market rent (FMR) schedule published by HUD as a benchmark in setting reasonable market rents for AHA-Assisted Units. Atlanta Housing Authority, in its discretion and using its MTW flexibility, may discontinue the use of Flat Rents.
 - C. “Affordable Fixed Rent” is an AHA-designed non-income-based rent structure that sets rents for AHA-Assisted Units according to private market practices using property-related factors, including, but not limited to, the particular community in question, location, unit size, operating costs and other expenses, demand for the community, community demographics, and the amenity package.
4. When Income Adjusted Rents and Flat Rents are available in the Resident’s community, the amount of a Resident’s rent will be based on whether a Resident selects either the Income Adjusted Rent or the Flat Rent.
5. When Income Adjusted Rents and Flat Rents are available in the Resident’s community, a Resident will be subject to a “Rent Adjustment Fee” if the Resident changes the method of rent payment during the calendar year, unless the Resident can document a hardship reason as to why the change is necessary.
6. Affordable Fixed Rents, if implemented, may be the only rent structure offered in certain communities identified under Atlanta Housing Authority’s Annual MTW Plan. Income-adjusted Rents will not be available in those communities. All Residents residing in these communities will have to pay the applicable Affordable Fixed Rent for AHA-Assisted Units in accordance with the schedule established for their community.

ARTICLE TWO.

BASIC LEASE OBLIGATIONS AND RESPONSIBILITIES

1. Resident is to live in the AHA-Assisted Unit in such a manner that does not adversely impact the quiet, peaceful enjoyment of the premises by other residents while meeting all of the obligations set forth in the Lease, including, but not limited to, those obligations relating to the Work Requirement, housekeeping, other health and safety concerns, criminal activity prohibitions, reporting criminal activity on the premises, and economic independence initiatives.
2. All household members, 16 years of age or older, are required to execute authorization forms allowing the Management Agent to conduct any background check, examination, or verification required for appropriate determinations under the initial or periodic recertification process in order to ensure Residents meet all criteria for continued occupancy. The period of the authorization will be established in the Management Operating Procedures.
3. Resident households that are not compliant with the applicable Lease, including the community's apartment rules and Atlanta Housing Authority's Work Requirement, are subject to Lease termination.
4. Each Resident Head of Household and Resident household member shall be responsible for the actions and activities of household members, visitors, guests, and invitees while those persons are either a member of the household, visiting the household, or are on the property.
5. Residents who fail to fulfill the obligations and responsibilities under the provisions of this Part III, Article Two, or under the provisions of the Lease shall be subject to the termination of or significant reduction in rental subsidy resulting in an increase in the amount of Tenant Rent, or the nonrenewal or termination of their Lease.

ARTICLE THREE.

OCCUPANCY, CHARGES AND ALLOWANCES

1. To avoid overcrowding and the conditions that may arise from overcrowding in an AHA-Assisted Unit, no more than two people shall be approved to occupy a bedroom. Additional consideration, as determined by Atlanta Housing Authority, the Owner Entity or the Management Agent, may be given to households who may request a larger AHA-Assisted Unit based on significant, verifiable circumstances, including, but not limited to, the age and gender of household members and reasonable accommodations requests.
2. Security deposits shall be collected at such levels as Atlanta Housing Authority, Owner Entities, and/or Management Agents may determine based on the bedroom size and the particular community with AHA-Assisted Units.
3. Atlanta Housing Authority or the Owner Entity (with the approval of Atlanta Housing Authority) may establish community-specific utility allowances by bedroom size for each community based on the reasonable rate of actual utility consumption by energy conservative households; and may, after considering the existing condition of a community, including

the age of building infrastructures, amount of insulation, and air circulation, adjust such allowances to account for the actual utility consumption required to maintain a reasonable quality of life environment under such conditions.

4. Atlanta Housing Authority, in its discretion, may charge Residents for excess utility usage that exceeds the utility allowances established for the AHA-Owned Community.
5. The Management Agent may establish and, if approved by Atlanta Housing Authority or the Owner Entity, publish for each community with AHA-Assisted Units a schedule of reasonable fees and charges, including but not limited to Maintenance Charges, Transfer Fees, Application Fees, Damage Fees, Supplemental Screening Fees, Pet Deposits, Pet Application Fees, and Dispossession Fees which may be charged to residents in addition to rent and excess utility charges, as applicable.

ARTICLE FOUR.

TRANSFERS

1. Residents may request a transfer to another AHA-Assisted Unit within the same community with AHA-Assisted Units subject to approval by the Management Agent (“Community Transfer”). A request to move to another community is not considered a Community Transfer. Residents cannot initiate a transfer to another community. Residents must submit an application to the other community and, if approved, provide the appropriate notice under the current Lease, except as provided for in Section 6 of this Article Four.
2. Residents who have requested a Community Transfer must be current in all obligations under the Lease.
3. A Resident’s request for a Community Transfer may not be approved if the Resident has resided in the current apartment for less than one year, except in those cases where there are verifiable medical reasons or a verifiable disability requiring special features, which cannot be provided through a reasonable accommodation in the current unit.
4. If the Community Transfer is approved by the Management Agent, the Resident may be required to pay a “Transfer Fee” based on the schedule of fees published for the particular community with AHA-Assisted Units.
5. Residents will not have to pay the Transfer Fee if the Community Transfer is required or initiated by Atlanta Housing Authority, Owner Entity, or Management Agent, or for such other valid reason, such as a reasonable accommodation as outlined in Section 6, as determined by the Management Agent.
6. The following policies apply to reasonable accommodation transfers:
 - A. All reasonable accommodation transfers have priority over all other transfers, except natural disaster transfers, emergency transfers and relocations;
 - B. Residents of AHA-Owned Communities with disabilities who require a transfer to another AHA-Owned Community as a reasonable

accommodation will not be required to make a separate application at the desired Atlanta Housing Authority AHA-Owned Community;

- C. A Resident's initial security deposit will be transferred to the new unit and no additional security deposit charges will be incurred when the Resident with disabilities transfers to another AHA-Owned Community as a reasonable accommodation; and
 - D. Residents with disabilities who require a transfer as a reasonable accommodation will not incur any termination penalties for early lease termination.
 - E. Management Agents of AHA-Owned Communities and MIMF or PBRA Communities will maintain a Transfer List that prioritizes the transfer of Residents who require a transfer due to an obvious or verified qualifying disability over new admissions of Applicants. The Transfer List will document the following:
 - i. Date and time of each reasonable accommodation transfer request;
 - ii. Name and address of Resident(s) to be transferred;
 - iii. Reason(s) for transfer, including information regarding the Resident's reasonable accommodation request(s) and/or request for a UFAS-Accessible Unit or an AHA-Assisted Unit with accessible features;
 - iv. Current disposition of reasonable accommodation transfer request;
 - v. Date of transfer; and
 - vi. Name of Resident transferred out of an AHA-Assisted Unit to accommodate a Resident's disability per the Management Agent's execution of a lease addendum that requires a Resident without a disability to relocate to a vacant, non-accessible unit, at no expense to that Resident.
7. Atlanta Housing Authority may initiate "Relocation Transfers" outside of a community from time to time to facilitate Atlanta Housing Authority's property repositioning strategy, which includes, but is not limited to, the sale of property, revitalization activities, and/or development opportunities related to an AHA-Owned Community, or for other valid reasons as determined by Atlanta Housing Authority.
8. Relocation Transfers are transfers from one AHA-Owned Community to another AHA-Owned Community ("Destination Community"). Relocation Transfers are not considered Community Transfers, as described above in this Article Four, and Residents are not subject to the same requirements as set forth above for Community Transfers. Residents who are subject to Relocation Transfers bypass the waiting list at the Destination Community and receive priority consideration for the first available AHA-Assisted Unit at the Destination Community. Such Residents must meet the eligibility and suitability requirements outlined

in Part II of the Statement of Corporate Policies in order to be transferred to the Destination Community.

9. In order to accommodate a Resident household and to avoid overcrowding when a suitably sized AHA-Assisted Unit is not available, the Resident may request and the Management Agent may approve a Community Transfer from one AHA-Assisted Unit to two AHA-Assisted Units (“Split-Family Transfer”). The Resident’s request must be in writing stating the reason for the Split-Family Transfer, unless initiated by the Management Agent. Whether requested by the Resident or initiated by the Management Agent, the Resident must agree in writing to a Split-Family Transfer.
10. To qualify for a Split-Family Transfer, the Resident household must meet the requirements of this Article Four and the proposed Heads-of-Household of the units to be assigned under the Split-Family Transfer must be: (a) listed on the existing Lease as a member of the household as of the most recent recertification; and (b) legally capable of executing a lease.
11. Split-Family Transfers may be used by Resident households subject to Relocation Transfers when a suitably sized apartment is not available in a Destination Community. Such Resident households must qualify for the Split-Family Transfer pursuant to this Article Four, as applicable.

ARTICLE FIVE.

PET POLICY

1. Atlanta Housing Authority will permit Residents of AHA-Owned Communities to keep common household pets or other animals that are widely acknowledged and accepted as household pets, provided the Resident’s keeping of a pet is not a threat to the health and safety of other residents and otherwise meets the requirements established by the Management Agent for the community.
2. Residents of communities with AHA-Assisted Units are not allowed to keep: animals that are not widely acknowledged and accepted as household pets; household pets that are unlicensed as required by Fulton County; household pets temporarily (e.g. pet-sitting); and/or household pets for the purpose of training or engaging in any business activity related to household pets in the Resident’s apartment, or anywhere else within the community.
3. Residents in a MIMF or PBRA Community, who desire to keep a common household pet, may only do so if household pets are generally allowed at the community and then only in strict accordance with the household pet procedures prescribed at the Resident’s MIMF or PBRA Community, except as provided for in Section 5 below with respect to Assistance Animals.
4. Certain MIMF or PBRA Communities may exclude common household pets altogether if it is in the best interest of the community to do so, except as provided for in Section 5 below.
5. Owner Entities and Management Agents will make reasonable accommodations for an “assistance animal”. Pet policies for AHA-Owned Communities and MIMF or PBRA Communities shall:

- A. Expressly exclude Assistance Animals clarifying that an “Assistance Animal” is an animal that is needed as a reasonable accommodation for persons with disabilities and is not generally subject to the standard pet policy;
- B. Define an “Assistance Animal” as an animal that is needed as a reasonable accommodation for persons with disabilities (Assistance Animals are animals that work, provide assistance, or perform tasks for the benefit of a person with a disability; or animals that provide emotional support that alleviate one or more identified symptoms or effects of a person’s disability);
- C. Remove unreasonable height and weight restrictions for Assistance Animals;
- D. Remove unreasonable breed restrictions for Assistance Animals, except in accordance with local laws or ordinances;
- E. Remove pet deposits for Assistance Animals; and
- F. Clarify that any household pet exclusions in any community’s policies do not apply to Assistance Animals required by Residents of AHA-Assisted Units.

ARTICLE SIX.

DISPUTING DECISIONS OF MANAGER

The purpose of Article Six is to provide Applicants and Residents with a dispute process to address eligibility, general admissions, occupancy and leasing issues, and requests for reasonable accommodations in a manner that seeks equitable resolutions to such issues in an expedient and responsive manner. Applicants and Residents with disabilities may request reasonable accommodations in order to participate in the dispute process. The dispute process outlined in this Article Six shall not govern the process related to the denial of admission based on the findings of a criminal history report as outlined in Part II, Article Seven, Paragraph 2 (Adverse Criminal History Decision) of the Statement of Corporate Policies.

1. DISPUTE PROCESS FOR APPLICANTS

- A. Applicants for AHA-Assisted Units who are denied admission based on eligibility and general admissions criteria and desire to dispute this action must request a meeting with the Management Agent or the Management Agent’s designee within ten (10) calendar days of the disputed action.
- B. An Applicant’s request for a meeting, including the need for a reasonable accommodation, must be in writing.
- C. The Management Agent will schedule the meeting within a reasonable period of time, provided the Applicant’s written request for the meeting was received in a timely manner.
- D. An Applicant may bring a representative to this meeting to assist the Applicant.
- E. The Management Agent is under no obligation to meet with the Applicant after the conclusion of the requested meeting.

- F. A written decision should be provided to the Applicant within a reasonable time following the conclusion of the meeting. If the Management Agent's decision is to deny the application, the decision shall set forth the reasons for the denial.

2. DISPUTE PROCESS FOR RESIDENTS

- A. Atlanta Housing Authority, Owner Entity and/or Management Agent, as applicable, are authorized under the terms of the Lease, Lease Addenda, and Apartment Rules to initiate an adverse action against a Resident with respect to leasing and occupancy violations that may result in a denial, significant reduction or termination of benefits otherwise due a Resident. With respect to termination or eviction based on criminal activity, Residents are to be offered an opportunity to dispute the accuracy and relevance of a criminal record prior to termination or eviction based on criminal activity.
- B. Residents may dispute such adverse actions.
- C. Residents must request a meeting with the Management Agent or the Management Agent's designee within ten (10) calendar days of notice of the adverse action or in accordance with the dispute handling procedures in effect at the Resident's community with AHA-Assisted Units.
- D. The period of time within which the Resident must request a meeting may be shorter if the Resident's Lease is being terminated for criminal activity and the Management Agent has reasonably determined that the Resident poses a threat to the health and safety of the Community.
- E. A Resident's request for a meeting, including the need for a reasonable accommodation, must be in writing.
- F. The dispute process at each community with AHA-Assisted Units must allow the Resident to meet with an impartial designee of the Management Agent who did not participate in the initial decision affecting the Resident. The impartial designee may not be a subordinate of the person who made the initial decision. A Resident may bring a representative to this meeting(s) to assist the Resident.
- G. The impartial designee of the Management Agent is under no obligation to meet with the Resident about the dispute after the conclusion of the final meeting.
- H. A written decision should be provided to the Resident within a reasonable time following the conclusion of the meeting. If the impartial designee's decision is to rule against the Resident, the decision shall set forth the reasons for the denial, significant reduction or termination of benefits.
- I. Notwithstanding anything to the contrary set forth above, the Owner or the Management Agent may evict the occupants of a dwelling unit

through judicial eviction procedures instead of providing the dispute process opportunity outlined above.

PART IV - MISCELLANEOUS

ARTICLE ONE.

AVAILABILITY OF OFFICIAL LEASING DOCUMENTS

1. Official leasing-related documents will be maintained in the management office of any community with AHA-Assisted Units.
2. Official leasing-related documents can be reviewed by Applicants, Residents, and other interested parties upon reasonable request and notice during normal office hours.
3. Amendments and/or updates to Fee Schedules, Rent Structures, Utility Allowances, Routine Maintenance and other charges may be approved from time to time by Atlanta Housing Authority or the Owner Entity, as applicable. Such amendments and/or updates shall be implemented only after Residents have been given reasonable notice of the effective date.

ARTICLE TWO.

APPROVAL OF MANAGEMENT PRACTICES

Management Operating Procedures, administrative procedures, processes, protocols, and management practices for any policy, initiative, or approach shall be developed following the intent of this Statement of Corporate Policies and may be approved, amended, or withdrawn at the discretion of Atlanta Housing Authority.

[END OF CHAPTER 2]

CHAPTER 3

HOUSING CHOICE TENANT-BASED PROGRAM POLICIES

PART I – INTRODUCTION

ARTICLE ONE. GENERAL POLICY REQUIREMENTS

The General Policy Requirements for Rental Assistance Programs set forth in Chapter 1 are applicable to this Chapter 3 which covers the Program-Specific Policies for the Housing Choice Tenant-Based Program (“Program”).

ARTICLE TWO. PROGRAM MANAGEMENT AND OPERATING PROCEDURES

1. The operating division designated by Atlanta Housing Authority is responsible for performing all program management functions related to the implementation and administration of the Program (“Operations Division”). The Operations Division is responsible for developing and implementing written Program operating procedures (“Operating Procedures”) that are consistent with the policies outlined in this Statement of Corporate Policies.
2. Atlanta Housing Authority may create and apply technology solutions to improve the efficiency and effectiveness of applicable program management functions in order to create, where appropriate and practical, a paperless environment. The Operations Division will include the requirements, procedures and processes for the implementation and administration of technology solutions and concomitant applications in the Operating Procedures.
3. The terms Applicant and Participant are defined to include all household members with respect to their compliance with the Housing Choice Tenant-Based Program Policies set forth in this Chapter 3 of this Statement of Corporate Policies and implemented through the Operating Procedures.

PART II – ADMISSION TO THE PROGRAM

ARTICLE ONE. WAITING LIST NOTIFICATION

1. Atlanta Housing Authority will comply with all Fair Housing and Equal Opportunity requirements applicable to public notices announcing the opening and closing of the Program waiting list (“Waiting List”) for a Housing Choice Tenant-Based Voucher (“Voucher”).
2. Atlanta Housing Authority will make reasonable efforts to provide adequate notification to potential applicants with respect to applicant eligibility, the period of the opening, reasonable accommodations opportunities and other details related to the acceptance of applications to the Waiting List as set forth in the Operating Procedures.

ARTICLE TWO

WAITING LIST APPLICATION PROCESS

The form of application and administrative procedures for receiving applications from Applicants, placing Applicants on the Waiting List and selecting Applicants from the Waiting List are set forth in the Operating Procedures.

ARTICLE THREE.

ORGANIZATION AND MAINTENANCE OF THE WAITING LIST

1. The equitable methods of processing Applicants on the Waiting List and the processes for organizing, updating and maintaining Applicant records are set forth in the Operating Procedures. AHA, in its discretion, may establish reasonable procedures related to the Waiting List, including but not limited to procedures for reevaluating the reliability of waiting list information provided by Applicants, exploring alternative strategies for the selection of Applicants and setting the requirement that Applicants on the Waiting List must notify AHA of their interest within a specified period of time in order to remain on the Waiting List.
2. The maintenance of the Waiting List with respect to updating applications, notice letters, and removals will be detailed in the Operating Procedures.
3. Applicant responsibilities and requirements for updating changes to the information reported during the application process and for responding to requests for information are stated in the Operating Procedures.

ARTICLE FOUR.

SPECIAL ADMISSIONS

1. Atlanta Housing Authority may accept applications from eligible households who have relocated from a community owned by Atlanta Housing Authority due to demolition, repositioning, disposition or other related Atlanta Housing Authority activities without opening the Waiting List.
2. Atlanta Housing Authority, in its discretion, may authorize the special admission of eligible and qualified applicants to the Program, in order to implement special initiatives; offer homeownership opportunities to eligible households; admit households impacted by an owner opt-out of a housing assistance contract on a HUD-insured multi-family development; and/or address an urgent local need as determined and approved by Atlanta Housing Authority including, but not limited to, foreclosure assistance and natural disasters, assistance to eligible victims of domestic violence pursuant to the *Violence Against Women Act*, pilot programs for at-risk populations, or relocation activities. Special admissions may also be approved, as a reasonable accommodation, for transfer assistance to an eligible and qualified person with a verifiable disability who resides in an AHA-Owned Community or whose name is on a transfer/waiting list to be assisted who requires a UFAS Accessible Unit.
3. Any household eligible for a special admission, as determined by Atlanta Housing Authority, may not be denied a Voucher for admission to the Program provided that no member of the household has committed an offense specifically identified by HUD pursuant to 24 CFR 982.553 as described in Chapter 1, Article Fifteen of this Statement of Corporate Policies.

4. Atlanta Housing Authority, in its discretion, may deny special admission to a household if any of their household members are or have been engaged in criminal activity that could reasonably be expected to indicate a threat to the health, safety or welfare of others, including other residents, Atlanta Housing Authority and its staff, Owners/Landlords, and/or Management Agent staff as stated in Chapter 1, Article Fifteen of this Statement of Corporate Policies.
5. Other eligibility requirements specific to the special admission program, procedures, processes and general management practices for special admissions will be outlined in the Operating Procedures.

ARTICLE FIVE.

ELIGIBILITY DETERMINATION

1. An Applicant desiring to participate in the Program must complete a full application in accordance with the Operating Procedures and demonstrate that: (a) Applicant meets one of the definitions of Family; (b) Applicant's total household income verified for the initial eligibility determination does not exceed the "Very Low-Income" limit published by HUD for the household size; (c) Applicant fully satisfies applicable statutory and HUD's regulatory requirements for citizenship and/or eligible immigrant status; (d) Applicant is in compliance with the Work Requirement set forth in Chapter 1, Article Ten of this Statement of Corporate Policies; (e) Applicant has an acceptable criminal background record; and (f) Applicant is able to comply with all Program obligations.
2. An Applicant's qualifications for Participation must be verified through appropriate documentation as set forth in the Operating Procedures.
3. Atlanta Housing Authority will notify Applicants, in writing, of an ineligibility determination. Such notification will set forth the reasons for the ineligibility determination and provide instructions regarding how the ineligible Applicant may request a review of the determination.

PART III – PROGRAM PARTICIPATION

ARTICLE ONE.

FAMILY BRIEFINGS

Prior to Voucher issuance, Applicants are required to participate in a "Family Briefing" that provides an overview of the Program in order to inform, review and educate Applicants regarding Program procedures, family obligations, compliance with Program requirements, and available housing opportunities. The Family Briefing will be conducted in accordance with the Operating Procedures.

ARTICLE TWO.

VOUCHER ISSUANCE

Vouchers are issued to Applicants for a reasonable period of time in accordance with the Operating Procedures. Extensions to the term of the Voucher may be granted on a case-by-case basis, reasonable accommodation requests, and other reasonable requests related to an Atlanta Housing Authority special or strategic initiative. The procedures for granting extensions are set forth in the Operating Procedures.

ARTICLE THREE.

VOUCHER SIZE

1. The size of the rental housing unit that a Participant may lease under the Program is based on the number of bedrooms Atlanta Housing Authority has approved for the Participant's Voucher ("Voucher Size").
2. A Participant may not lease a rental housing unit that has more bedrooms than the Voucher Size unless approved by Atlanta Housing Authority. In the event Atlanta Housing Authority approves a Participant's request for a change in the Voucher Size, a new Voucher with the approved Voucher Size will be issued to the Participant.
3. To avoid overcrowding and the conditions that may arise from overcrowding, the Voucher Size of the Voucher issued to each eligible Participant will be determined in accordance with Operating Procedures based on the verifiable needs of the Participant household. As a general rule, no more than two people may occupy a bedroom. However, in considering a request made by a Participant, a variety of factors, including, but not limited to, the number of people in the household, the age and gender of household members, special needs and reasonable accommodations, may be approved by Atlanta Housing Authority in determining Voucher Size.

ARTICLE FOUR.

TRANSFER OF ASSISTANCE

1. An Applicant cannot transfer her/his Voucher to another person or family. There is no expressed nor implied right that permits or entitles the selective transfer of a Voucher that was issued to an Applicant for her/his exclusive use as head-of-household on behalf of an assisted household.
2. If the Voucher holder, as the head-of-household of a housing unit assisted under the Program, abandons, leaves, moves out of or is involuntarily removed from the household or dies, Atlanta Housing Authority will determine the disposition of the Voucher with respect to the remaining members of the household in accordance with the Operating Procedures.

ARTICLE FIVE.

SUITABILITY

Atlanta Housing Authority determines Participant eligibility for the Program in accordance with the Operating Procedures but does not otherwise screen Participants as to their suitability as tenants. It is the rental property owner's (Owner/Landlord) responsibility, not Atlanta Housing Authority's responsibility, to screen and make its own determination regarding the suitability and acceptability of Participants as prospective tenants using the Owner/Landlord's own screening criteria in compliance with the Fair Housing Act and other applicable requirements. As a general practice, Atlanta Housing Authority does not provide its screening reports to Owners/Landlords and Owner/Landlords may not rely upon such screening reports for any purpose.

ARTICLE SIX.

PARTICIPANT OBLIGATIONS AND RESPONSIBILITIES

1. Participants must occupy their assisted unit as their sole place of residence and conduct themselves in an acceptable and responsible

manner that would not adversely impact the quiet and peaceful enjoyment of the premises and neighborhood by other community residents.

2. Participants must meet all obligations set forth in this Statement of Corporate Policies as implemented through the Operating Procedures, including, but not limited to those obligations relating to lease violations, housekeeping, criminal activity prohibitions, other health and safety concerns, and economic independence initiatives.
3. Participants, or any member of the Participant's household, who becomes unemployed due to her/his resignation, retirement before age 62, quitting, termination, firing or other voluntary reasons, may not receive any rent relief as a result of the loss of employment and shall continue to be responsible for the entire Tenant Rent based on prior employment and income status.
4. Participants who provide third party verification satisfactory to AHA that loss of employment was due solely to a layoff will receive consideration for a reduction in Tenant Rent.

ARTICLE SEVEN.

PROGRAM MOVE

1. A Participant must give written notice to the Owner/Landlord and to Atlanta Housing Authority of intent to move from a unit assisted under the Program pursuant to the terms of the lease between the Participant and the Owner/Landlord and the Participant's obligations under the Program ("Program Move").
2. The procedures, processes and general administrative guidelines governing Program Moves are set forth in the Operating Procedures.
3. Atlanta Housing Authority may initiate a Program Move due to Owner/Landlord non-compliance with Program requirements; requests for reasonable accommodations; victim protection under the Violence Against Women Act; relocation activities; pilot program requirements for at-risk populations; and other reasons as set forth in the Operating Procedures.
4. Participants undergoing a Program Move may be required to attend a Family Briefing as set forth in the Operating Procedures.

ARTICLE EIGHT.

PORTABILITY

1. Voucher portability procedures, processes and general administrative practices are set forth in the Operating Procedures.
2. Voucher portability to another jurisdiction will generally follow the applicable HUD rules and regulations unless modified by an inter-jurisdictional cooperative agreement and applicable authorizations under Atlanta Housing Authority's MTW Agreement.
3. Atlanta Housing Authority will require Participants porting to other jurisdictions to comply with Atlanta Housing Authority's policies, including the Work Requirement. Atlanta Housing Authority may, at its discretion, waive such requirements for Participants where Atlanta

Housing Authority determines that it is not feasible to administer program compliance for such Participants.

4. Atlanta Housing Authority, in its discretion, may place reasonable restrictions on the ability of Participants to port outside of its jurisdiction. Such restrictions may include, but will not be limited to, Program tenure, Work Requirement compliance, status of current Lease and other restrictions relating to compliance with family obligations under the Program.

PART IV – AHA SUBMARKET PAYMENT STANDARDS AND CONTRACT RENT DETERMINATIONS

ARTICLE ONE.

MTW AUTHORIZATION

1. Atlanta Housing Authority’s MTW Agreement authorizes AHA to make determinations with respect to payment standards, rent reasonableness methodologies, and reasonable contract rents and increases to such rents.
2. Atlanta Housing Authority, in its discretion and pursuant to the MTW authorizations, may explore, establish and implement different rent structures to further align the Program with private sector practices as well as to maximize the use of the subsidy resource to promote and support economic independence among Program Participants.
3. Atlanta Housing Authority’s policies regarding payment standards and rent determinations support effective strategies for the deconcentration of poverty by providing Participants with meaningful and broader housing opportunities in order to access quality affordable housing.

ARTICLE TWO.

AHA SUBMARKET PAYMENT STANDARDS

1. Atlanta Housing Authority will establish, implement and publish maximum rental subsidy amounts for Voucher-assisted rental units by location and bedroom size (“AHA Submarket Payment Standards”). The AHA Submarket Payment Standards will be used in lieu of the Fair Market Rents published annually by HUD in the Federal Register. AHA will utilize recognized market study practices and other valuation methods for establishing the AHA Submarket Payment Standards.
2. The objective of the AHA Submarket Payment Standards is to maximize the use of Voucher subsidy funding in support of strategies that promote the deconcentration of poverty and broader housing opportunities, promote the expansion of affordable housing, provide reasonable accommodation for Participants who are Elderly or Disabled Persons, and support the sustainability of the Program.
3. Atlanta Housing Authority, in its discretion, may establish, implement and publish a payment standards schedule applicable to a broader area in support of portability initiatives.
4. Atlanta Housing Authority may amend the AHA Submarket Payment Standards periodically based on changing market conditions.

5. The procedures for implementing the AHA Submarket Payment Standards will be set forth in the Operating Procedures.

ARTICLE THREE. SETTING REASONABLE CONTRACT RENTS

1. The rent requested by an Owner/Landlord and approved by Atlanta Housing Authority for a rental unit to be leased under the Program is the “Contract Rent.”
2. To be approved, a Contract Rent must be reasonable when compared to comparable unassisted rental units in the rental market. Any exception to a Contract Rent determination must be approved by AHA’s Investment Committee or its designee.
3. Methodologies for determining reasonable Contract Rents will utilize data derived from a variety of resources including, but not limited to, market rent studies (whether conducted by Atlanta Housing Authority or other public or private entities), HUD Fair Market Rent data for the Atlanta-Sandy Springs-Marietta MSA, private sector databases, academic and other empirical studies, and regional economic forecasts.
4. Atlanta Housing Authority’s process for setting reasonable Contract Rents are set forth in the Operating Procedures.

ARTICLE FOUR. AHA SUBMARKET PAYMENT STANDARDS LIMITATIONS ON CONTRACT RENTS

1. A Contract Rent proposed for a rental unit under the Program cannot exceed the applicable AHA Submarket Payment Standard.
2. When a Contract Rent for a rental unit exceeds the applicable AHA Submarket Payment Standard, an exception to the applicable AHA Payment Submarket Standard may be granted, provided the Contract Rent is reasonable and the justification for such approval is based on the quality of the rental unit regardless of submarket, the location of the rental unit with respect to its proximity to revitalization activities, a reasonable accommodation request, and other reasonable justifications related to achieving Atlanta Housing Authority’s goals. Any exception to the AHA Submarket Payment Standards must be approved by AHA’s Investment Committee or its designee. The procedures for granting exceptions will be set forth in the Operating Procedures.
3. In some cases that cannot be fully justified, AHA, in its discretion, may not grant an exception to an AHA Submarket Payment Standard when the Contract Rent for a rental unit exceeds the AHA Submarket Payment Standard. In such cases AHA may allow the Participant to add that portion of the proposed Contract Rent that exceeds the applicable AHA Submarket Payment Standard to the Participant’s Tenant Rent, provided the proposed Contract Rent is reasonable and the Participant will not experience an excessive Rent Burden, as determined and approved by AHA.

PART V – INSPECTIONS

ARTICLE ONE.

QUALITY UNITS

1. Atlanta Housing Authority established and may amend enhanced local standards (“AHA Enhanced Inspection Standards”) periodically to ensure that rental units under the Program offer Participants quality housing in healthy communities.
2. Factors such as levels of concentrated poverty, neighborhood crime, proximity to good neighborhood schools, access to public transportation, and access to retail businesses, among other factors, will be considered. Unit, site, and neighborhood conditions must continue to meet AHA Enhanced Inspection Standards for as long as the assisted unit remains on the Program. It is the goal of the Program to provide opportunities for all Participants to reside in rental units in neighborhoods that promote and enhance educational and employment goals, good citizenship, and peaceful and cooperative community living.
3. Atlanta Housing Authority policy requires that only Owners/Landlords with quality rental units can participate in the Program. Atlanta Housing Authority, in its discretion, can deny the participation of Owners/Landlords with substandard or marginal rental units (including rental units in areas that do not meet Atlanta Housing Authority site and neighborhood standards) for Program participation.
4. AHA, in its discretion, may develop and implement procedures and practices governing the abatement of housing assistance payments payable to Owners/Landlords in the event a rental unit assisted under the Program fails to comply with the AHA Enhanced Inspection Standards. The procedures and practices established under this policy will be set forth in the Operating Procedures and implemented as a substitute for any applicable HUD rules and regulations.

ARTICLE TWO.

FREQUENCY OF INSPECTIONS

1. To ensure ongoing compliance with the AHA Enhanced Inspection Standards, Atlanta Housing Authority will inspect or coordinate the inspection of all rental units assisted under the Program prior to occupancy, on a periodic but planned basis and under special circumstances related to health and safety issues and quality assurance measures in accordance with the procedures, processes and general administrative practices set forth in the Operating Procedures.
2. AHA may establish a process in the Operating Procedures that would permit a high performing Owner/Landlord with a high quality property to self-certify that any rental unit under the Program in such property complies with the AHA Enhanced Inspection Standards without the need for an inspection by AHA. The Operating Procedures would also set forth the qualifications of high-performing Owners/Landlords, the quality benchmarks for eligible properties, the self-certification process and quality control measures.

ARTICLE THREE. **PROGRAM MARKETING AND OUTREACH**

Atlanta Housing Authority will continue to educate the public about the Program and to foster successful relationships throughout human services organizations, local and state governments, and the business community in order to ensure the availability of quality affordable rental units and family self-sufficiency opportunities for Program Participants. This effort includes outreach activities to Owners/Landlords with quality rental units as well as pre-qualification/pre-inspection processes to ensure the availability of quality rental units.

PART VI – HOUSING CHOICE RENTAL ASSISTANCE AGREEMENT

ARTICLE ONE. **BUSINESS RELATIONSHIP WITH OWNERS/LANDLORDS**

The Housing Choice Rental Assistance Agreement, (“HCRA Agreement”), or any successor or related agreement that Atlanta Housing Authority may develop and implement pursuant to its authorizations under the MTW Agreement, is the controlling agreement that defines the business relationship between Atlanta Housing Authority and Owners/ Landlords.

ARTICLE TWO. **LEASE ADDENDUM**

The Housing Choice Rental Lease Addendum, (“Lease Addendum”), or any successor or related lease addendum that Atlanta Housing Authority may develop and implement pursuant to its authorizations under the MTW Agreement, is the controlling document that defines business relationship between Participants and Owners/ Landlords with respect to their participation in the Program.

ARTICLE THREE. **LEASE AND HCRA AGREEMENT TERMINATION**

Procedures, processes and general administrative guidelines governing lease terminations by the Owner/Landlord with respect to the Participant and the resulting termination of the HCRA Agreement are set forth in the Operating Procedures.

ARTICLE FOUR. **ENHANCEMENTS TO HCRA AGREEMENT AND LEASE ADDENDUM**

Atlanta Housing Authority may develop enhanced versions of the HCRA Agreement and Lease Addendum in order to attract and retain high quality multifamily communities in the Program.

ARTICLE FIVE. **BUSINESS RELATIONSHIP PROGRAM PROCEDURES**

Atlanta Housing Authority’s Program procedures governing the conduct of the business relationship between Atlanta Housing Authority and Owners/Landlords are set forth in various written communications and guidelines as set forth and directed by the Operating Procedures.

PART VII – PROGRAM TERMINATIONS

ARTICLE ONE.

DENIAL AND TERMINATION OF ASSISTANCE

1. Atlanta Housing Authority may deny admission to Applicants or terminate the housing assistance benefits of Participants if they or any household member are or have been engaged in criminal activity that could reasonably be expected to indicate a threat to the health, safety or welfare of others. Atlanta Housing Authority's Criminal History Screening Policy is set forth in Chapter 1, Article Fifteen of this Statement of Corporate Policies. An arrest record alone may not provide sufficient evidence of disqualifying conduct. However, an arrest record can trigger an inquiry into whether a person engaged in disqualifying criminal activity. Additional evidence, such as law enforcement reports detailing the circumstances of the arrest, witness statements and other relevant documentation, may be used to assist in making a determination that the disqualifying conduct occurred. Reliable evidence of a conviction for criminal conduct that would disqualify an individual for tenancy (such as a background report from a reliable source) or an admission by the offender may also be the basis for determining that the disqualifying conduct occurred.
2. Other causes Atlanta Housing Authority may deny admission to Applicants or terminate the housing assistance benefits of Participants include the following.
 - A. An Applicant or Participant who owes rent or other amounts to Atlanta Housing Authority or to another housing agency in connection with Program.
 - B. An Applicant or household member, either of whom being a former Program Participant or former public housing resident, who failed to reimburse Atlanta Housing Authority or another housing agency for overpaid assistance or underpaid rent or for any outstanding charges owed to an Owner/Landlord under an assisted lease paid by Atlanta Housing Authority or another housing agency.
 - C. An Applicant or Participant who is not in compliance with any of the requirements for selection and continued participation in the Program as set forth in the program application, voucher, program rules, family obligations set forth in the voucher, HCRA Lease Addendum, applicable HUD regulations or this Statement of Corporate Policies.

ARTICLE TWO.

OTHER TERMINATIONS OF HCRA AGREEMENTS AND PARTICIPANT ASSISTANCE

1. Atlanta Housing Authority may terminate a HCRA Agreement if the Owner/Landlord is not in compliance with the terms and conditions of the HCRA Agreement and for any other reason set forth in the HCRA Agreement or otherwise allowed by law.
2. Atlanta Housing Authority may deny or terminate assistance if Atlanta Housing Authority has reason to believe that a Participant household member has failed to abide by Program rules, regulations, or family

obligations. Atlanta Housing Authority shall have the discretion to consider all of the circumstances in each case, including the seriousness of the offense, if the violation is a first offense or a pattern of behavior, the extent of participation by the household member, and the effects that denial or termination would have on the other members of the Participant household not involved in the prescribed activity.

ARTICLE THREE. TERMINATION OF ASSISTANCE NOTIFICATION

If Atlanta Housing Authority deems it necessary to terminate assistance, Atlanta Housing Authority will give both the Participant and the Owner/Landlord written termination notices in accordance with the Operating Procedures.

ARTICLE FOUR. INFORMAL REVIEWS AND INFORMAL HEARINGS

1. **Applicants** may exercise the right to an “Informal Review” regarding denial of an application for housing assistance or denial of a reasonable accommodation request. Requests for an Informal Review must be made in writing within ten (10) business days from the date of the notice of ineligibility or denial of assistance from the Atlanta Housing Authority.
2. Prior to the Informal Review, a denied Applicant may request an opportunity to examine the application file and to copy any relevant documents at the Applicant’s cost. The Informal Review will be conducted by a person appointed by Atlanta Housing Authority who is neither the person who made or approved the decision under review nor the subordinate of such person. Both the Applicant and Atlanta Housing Authority will have the opportunity to present evidence at the Informal Review. The Applicant may bring witnesses, representatives (including attorneys) or letters of support to the Informal Review. In the event Atlanta Housing Authority’s representative for the Housing Choice Voucher Program presents any witnesses, the Applicant will have a right to cross-examine them. In the event the Applicant presents any witnesses, the representative from Atlanta Housing Authority will have a right to cross-examine them. Evidence may be considered without regard to admissibility under the rules of evidence applicable to judicial proceedings. An Informal Review decision shall be provided in writing to the Applicant within fifteen (15) business days from the date of the Informal Review. Requests for Informal Reviews, supporting documentation, and a copy of the final decision shall be retained in the applicant’s file.
3. **Participants** may exercise the right to an “Informal Hearing” to consider whether certain adverse actions that may result in significant reduction or termination of housing subsidy benefits violate the law, HUD regulations (to the extent applicable under MTW) or Atlanta Housing Authority policies.
4. Adverse decisions based on criminal activity - If the denial of admission or termination of assistance is based on criminal activity, Atlanta Housing Authority will provide a copy of the criminal background report at issue and the Applicant or Participant will be given the opportunity to dispute the accuracy and relevance of the record prior to the adverse decision.

Applicants and Participants are strongly encouraged to provide a copy of the disposition of the subject criminal offenses. If, however, an Applicant or Participant admits that he or she committed a crime, was convicted of a crime or that he or she entered a guilty plea for the criminal offense in question, he or she will not need to provide additional information regarding a criminal conviction or a guilty plea. This does not mean, however, that he or she will not be allowed to discuss the circumstances or any of the review considerations set forth below if he or she wants such additional information to be considered. Atlanta Housing Authority will consider evidence of the circumstances of the criminal case(s) including mitigating or aggravating circumstances; the time, nature and extent of the conduct including the severity of the conduct and the seriousness of the offense; and whether the conduct indicates that the Applicant or Participant would pose a danger to the health, safety or welfare of others.

5. Requests for an Informal Hearing must be made in writing within ten (10) business days from the date of the notice of denial or termination of assistance from the Atlanta Housing Authority. Prior to the Informal Hearing, the Participant may request an opportunity to examine the Participant's file and to copy any relevant documents at the Participant's cost. The Informal Hearing will be conducted by a person appointed by Atlanta Housing Authority who is neither the person who made or approved the decision under review, nor the subordinate of such person. Both the Participant and Atlanta Housing Authority will have the opportunity to present evidence at the Informal Hearing. The Participant may bring witnesses, representatives (including attorneys) or letters of support to the Informal Hearing. In the event Atlanta Housing Authority's representative for the Housing Choice Voucher Program presents any witnesses, the Participant will have a right to cross-examine them. In the event the Participant presents any witnesses, the representative from Atlanta Housing Authority will have a right to cross-examine them. Evidence may be considered without regard to admissibility under the rules of evidence applicable to judicial proceedings. Determinations shall be based on the preponderance of the evidence presented at the Informal Hearing. An Informal Hearing decision shall be provided in writing to the Participant within fifteen (15) business days from the date of the Informal hearing.
6. Requests for Informal Hearings, supporting documentation, and a copy of the final decision shall be retained in the Participant's file.
7. Applicants and Participants with disabilities may request reasonable accommodation in order to participate in the Informal Review and Informal Hearing process, as applicable.

PART VIII – INTER-JURISDICTIONAL COOPERATION

ARTICLE ONE.

COOPERATIVE AGREEMENTS

Atlanta Housing Authority may seek to establish cooperative agreements and similar arrangements between and among other housing agencies in other jurisdictions administering the Housing Choice Tenant-Based Program with respect to Voucher portability relating to eligibility, inspections, program requirements, fee sharing, billing and other arrangements that would promote and benefit inter-jurisdictional cooperation.

PART IX – SPECIAL PROGRAMS

ARTICLE ONE.

SPECIAL PROGRAMS POLICY

Atlanta Housing Authority, in its discretion, and as a policy matter may develop special programs, pilots and initiatives utilizing the regulatory relief and authorizations granted Atlanta Housing Authority under the MTW Agreement that address an identified need and support Atlanta Housing Authority's Vision, Mission and Guiding Principles. A special program that AHA may pilot utilizing tenant-based assistance solely for the purpose of addressing the local housing needs of at-risk populations shall comply with the applicable provisions of the Supportive Housing Policies as set forth in Chapter 4 of this Statement of Corporate Policies.

PART X – HOMEOWNERSHIP POLICY

ARTICLE ONE.

AUTHORIZATION

The Housing Choice Homeownership Program was first authorized under Section 555 of the Quality Housing and Work Responsibility Act of 1998. Pursuant to the statutory and regulatory relief afforded Atlanta Housing Authority under its MTW Agreement, Section VI.A.22 of the Statement of Authorizations authorizes Atlanta Housing Authority to determine the structure, terms and implementation of any homeownership program using Housing Choice Program Vouchers. Accordingly, Atlanta Housing Authority may use Housing Choice Program Vouchers in implementing and administering initiatives to create and promote homeownership opportunities that are consistent with Atlanta Housing Authority's guiding principles and Business Plan priorities.

ARTICLE TWO.

PROGRAM IMPLEMENTATION AND ADMINISTRATION

1. The Housing Choice Homeownership Program will be implemented and administered independent of and separate from the Housing Choice Tenant-Based Voucher Program by a division of the Atlanta Housing Authority designated by the President and Chief Executive Officer.
2. The division designated by the President and Chief Executive Officer is responsible for developing the structure, terms and written procedures for the implementation and ongoing administration of the Housing Choice Homeownership Program in accordance with the authorizations afforded Atlanta Housing Authority under its MTW Agreement.

[END OF CHAPTER 3]

CHAPTER 4

SUPPORTIVE HOUSING POLICIES

PART I – INTRODUCTION

ARTICLE ONE.

GENERAL POLICY REQUIREMENTS

The General Policy Requirements for Rental Assistance Programs set forth in Chapter 1 of this Statement of Corporate Policies are applicable to this Chapter 4 to the extent that such policies do not conflict with the Program-Specific Policies for Supportive Housing.

ARTICLE TWO.

BACKGROUND FOR ESTABLISHMENT OF SUPPORTIVE HOUSING

1. Atlanta Housing Authority determined that there was a need to develop housing assistance policies for special needs populations such as the homeless, persons with disabilities, persons with mental health or developmental disabilities, U.S. military veterans, at-risk families and youth and other targeted groups who are enrolled in supportive services programs and who require a stable housing arrangement to ensure the effectiveness of their respective supportive services plans.
2. Based on its past experience and lessons learned through such activities as the Homeless Demonstration Program, Mental Health Demonstration Program and other Supportive Housing initiatives which were implemented as part of the Project Based Rental Assistance (PBRA) program and other programs utilizing tenant-based vouchers, AHA concluded that typical housing assistance policies and procedures are not always the best fit for supportive service plans and the varying housing needs of the client populations. In order to fill this gap AHA developed the Supportive Housing Policies.
3. The Supportive Housing Policies set forth certain policies that authorize the establishment of operating procedures in support of local initiatives developed solely for the purpose of addressing the local needs of at-risk populations.
4. The Supportive Housing Policies apply to rental assistance programs and pilots characterized as being either: (i) Placed-based programs in which project based rental assistance commitments have been made by AHA or funded with public housing operating subsidies; or (ii) Tenant-based programs for which AHA may use Housing Choice tenant-based vouchers, special purpose vouchers and/or grants.
5. The Supportive Housing Policies are not applicable to rental units designated as *special needs* units pursuant to the State of Georgia's Qualified Allocation Plan under the Low Income Housing Tax Credit program that comprise less than ten percent of the total units in a mixed-income, mixed-finance rental community.

ARTICLE THREE. SUPPORTIVE HOUSING OPERATING PROCEDURES

1. AHA's Supportive Housing Policies utilize similar operating procedures as those used in AHA's Project Based Rental Assistance and Housing Choice Tenant-Based programs; however, occupancy arrangements, rent determinations, rules regarding continuing assistance and other considerations relating to the special needs of the populations being served will be tailored to various program needs and requirements of the specific Supportive Housing program or pilot program ("Supportive Housing Operating Procedures").
2. Project Based Rental Assistance, as set forth in Chapter 2 of this Statement of Corporate Policies, is an initiative designed and implemented by AHA using its flexibility authorized under its MTW Agreement.
3. The Housing Choice Tenant-Based Program, as set forth in Chapter 3 of this Statement of Corporate Policies, is a Rental Assistance Program designed and implemented by Atlanta Housing Authority using its flexibility authorized under its MTW Agreement.
4. In the event that there is a conflict between general operating procedures and the Supportive Housing Operating Procedures established under the Supportive Housing Policies, then the Supportive Housing Operating Procedures shall govern.

ARTICLE FOUR. DEFINITIONS

1. Supportive Housing Unit: A PBRA Unit and Housing Choice Tenant-Based Unit, as set forth in Chapters 2 and 3, respectively, of this Statement of Corporate Policies, that provide affordable housing to Supportive Housing Participants pursuant to these Supportive Housing Policies, are supportive housing units ("Supportive Housing Unit").
2. Supportive Housing Participant: An eligible family or person who meets the qualifications for admission to and occupancy of an available Supportive Housing Unit or the issuance of a Housing Choice tenant-based voucher in accordance with the Supportive Housing Policies shall be deemed a participant ("Supportive Housing Participant").
3. Service Provider: A service provider is a qualified organization that has been approved to provide specialized supportive services to Supportive Housing Participants pursuant to Part IV, Article One of the Supportive Housing Policies ("Service Provider").
4. Service Coordinator: The service coordinator is an organization responsible for developing local strategies for assisting special needs populations, working with public/private resources to identify and/or providing funds for service delivery activities, approving and coordinating Service Providers engaged in specialized supportive services and determining their status as approved Service Providers based on performance, and promoting community engagement and other related activities ("Service Coordinator").

5. Service Coordinator Agreement: AHA may enter into an agreement with one or more Service Coordinators in connection with AHA's support of one or more Supportive Housing programs and initiatives ("Service Coordinator Agreement") as described herein under Part IV, Article Three. In certain other Supportive Housing programs and initiatives that may be proposed to AHA, AHA, in its discretion, may not require a Service Coordinator Agreement and determine that the most effective approach in such cases would be to work directly with service providers, property owners and/or funders.

ARTICLE FIVE.

RENT DETERMINATIONS

AHA will follow the rent determination procedures established for the PBRA Program and Housing Choice Tenant-Based Program, as applicable in setting the rents for Supportive Housing Units. When setting rents for single-room occupancy and congregate housing arrangements, AHA will take into consideration the weighted value of shared facilities and amenities.

PART II – PBRA PROPOSAL SELECTION AND SITE-BASED ADMINISTRATION

In addressing the housing issues of special needs populations, AHA uses PBRA as a development tool and financial incentive for private developers and owners to expand the availability of new or existing high quality Supportive Housing Units.

ARTICLE ONE.

PROPOSAL SELECTION

AHA will periodically solicit developers/owners ("Owner") for new construction, rehabilitation and existing properties who are interested in providing Supportive Housing Units.

1. AHA will comply with its established procurement protocols for Request for Proposals (RFP) to solicit PBRA proposals for Supportive Housing Units from interested Owners ("Owner Proposal").
2. The details and scope of requirements for the preparation of Owner Proposals will be outlined in the RFP for Supportive Housing Units.
3. Owner Proposals for Supportive Housing Units will be selected in accordance with the evaluation criteria set forth in the RFP.
4. Upon approval of a selected Owner Proposal by the AHA Board of Commissioners, AHA will issue a PBRA commitment to the Owner that will expire on a date certain as set forth in the commitment ("PBRA Commitment"). The PBRA Commitment shall acknowledge that AHA will provide Supportive Housing Units contingent upon the Owner fulfilling the terms and conditions set forth in the PBRA Commitment with respect to the Owner's Proposal. The Owner's failure to meet the terms and conditions before the expiration date of the PBRA Commitment will result in the automatic termination of the PBRA Commitment unless AHA, in its discretion extends the term of the PBRA Commitment.
5. Upon fulfilling the Owner fulfilling the terms and conditions of the PBRA Commitment, as determined by AHA, AHA and the Owner will enter into a PBRA Agreement for Supportive Housing Units ("Supportive Housing PBRA Agreement").

ARTICLE TWO.

SUPPORTIVE HOUSING PBRA AGREEMENT

Because AHA does not own or control the Owner's Supportive Housing Units, the Owner shall be responsible for leasing, operating and maintaining the Supportive Housing Units in accordance with the Supportive Housing PBRA Agreement and Supportive Housing Policies.

1. The Owner shall execute AHA's form of Supportive Housing PBRA Agreement.
2. The term of the Supportive Housing PBRA Agreement shall be two years, unless AHA, in its discretion, approved a longer term in its PBRA Commitment to the Owner.
3. The Owner and Service Provider shall enter into a service provider agreement in a form approved by AHA ("Service Provider Agreement"). An executed copy of the Service Provider Agreement shall be an exhibit to the Supportive Housing PBRA Agreement.
4. The provisions controlling the business relationship between AHA and the Owner shall be outlined in the Supportive Housing PBRA Agreement including, but not limited to, the Owner's obligations related to selecting and entering into an agreement with a qualified Service Provider, site-based administration and other management obligations with respect to the operation of the Supportive Housing Units, the subsidy arrangement between the Owner and AHA and the submission of reports, as required by AHA, including evaluations and resolution of issues with respect to the performance of the Service Provider in discharging its duties pursuant to the Service Provider Agreement.

ARTICLE THREE.

OWNER'S OPERATING PROCEDURES

The Owner is responsible for developing and implementing written operating procedures for communities with Supportive Housing Units ("Owner's Operating Procedures").

1. The Owner's Operating Procedures must be consistent with the Supportive Housing and to the requirements of other funding sources and Service Provider Agreements. To the extent that the Service Coordinator, funding sources and Service Providers have special requirements regarding the occupancy and conduct of Supportive Housing Participants with respect to their Service Plans, such requirements must be included in the Owner's Operating Procedures.
2. The Owner's Operating Procedures must describe how Supportive Housing Participants are selected and admitted into Supportive Housing Units in coordination with the Service Provider and as may be further provided for in the Service Provider Agreement. The selection of qualified Supportive Housing Participants shall be made by the Service Provider in consultation with the Owner and in accordance with the provisions of the Service Provider Agreement. Qualified Supportive Housing Participants shall be placed on the Supportive Housing PBRA site-based waiting list that the Owner maintains and administers in an equitable and consistent manner.

3. The Owner must maintain records regarding the selection and admission and participation in services of Supportive Housing Participants. The Owner must make such records available periodically to AHA and upon request by AHA.
4. The Owner's Operating Procedures are subject to review by AHA in order to ensure consistency with the intent of the Supportive Housing Policies.

ARTICLE FOUR.

TRAINING

Owners, Service Providers and property management staff who are responsible for the operation of the Supportive Housing Units and the delivery of supportive services to Supportive Housing Participants are required to attend AHA-organized and/or AHA-sponsored training sessions regarding Supportive Housing Policies, Supportive Housing Operating Procedures, site-based administration, Owner/Service Provider coordination and other related matters.

PART III - ADMISSION AND RESIDENCY REQUIREMENTS

Supportive Housing Participants must comply with all Supportive Housing Policies related to their admission to and residency of Supportive Housing Units and residential units supported by a Housing Choice tenant-based voucher.

ARTICLE ONE.

SUPPORTIVE HOUSING ELIGIBILITY REQUIREMENTS

1. The Service Provider shall determine the initial and ongoing eligibility of a family or person as a qualified Supportive Housing Participant for referral to the Owner's site-based waiting list and placement in a Supportive Housing Unit pursuant to the Supportive Housing Policies and the Service Provider Agreement between the Owner and Service Provider.
2. Each Supportive Housing Participant must have a written Service Plan prepared by the Service Provider that documents the Supportive Housing Participant's agreement to participate in the program and comply with the terms and conditions of the Service Plan. For place-based programs in which services are available on-site, Owner must demonstrate and periodically report to AHA participation levels in services by Supportive Housing Participants.
3. In lieu of AHA's work/program requirements, Supportive Housing Participants must remain in compliance with their Service Plans. Service Providers will maintain a written record of each Supportive Housing Participant's progress in fulfilling Service Plan goals.
4. Supportive Housing Participants must qualify as very-low income members of one or more special needs populations such as the homeless, persons with disabilities, persons with mental health or developmental disabilities, U.S. military veterans, at-risk families and youth and other targeted groups who are enrolled in a supportive services program with a Service Provider and who require a stable housing arrangement to ensure the effectiveness of their respective Service Plans.

5. AHA shall establish reasonable program integrity and audit procedures to ensure that the selection, admission and occupancy oversight of Supportive Housing Participants in Supportive Housing Units are being performed in accordance with the Supportive Housing Policies.

ARTICLE TWO.

OCCUPANCY ARRANGEMENTS

Due to the varying housing and service delivery needs of special needs populations, the building format and configuration of Supportive Housing Units may also vary.

1. Supportive Housing Participants may occupy Supportive Housing Units in shared housing, single-room occupancy and congregate housing arrangements with shared facilities and amenities subject to approval by AHA.
2. Under the supervision of the Service Provider and in accordance with individual Service Plans, two or more unrelated Supportive Housing Participants may share a single unit provided the number of persons occupying the Supportive Housing Unit is in compliance with AHA's occupancy standards.
3. When the Owner is a faith-based organization, the Lease and/or the approved Service Plan shall not require the Supportive Housing Participant's involvement in religious activities as a condition for occupancy of the Supportive Housing Unit or participation in the Supportive Housing Program.

ARTICLE THREE.

DENIAL OF ADMISSION AND TERMINATION OF ASSISTANCE

1. Owners of Supportive Housing Units and residential units supported by a Housing Choice tenant-based voucher may deny admission or terminate assistance to a Supportive Housing Participant if it is determined that a Supportive Housing Participant has been or is engaged in a violent criminal activity that could reasonably be expected to be an immediate threat to the health, safety or welfare of others.
2. Pursuant to HUD requirements, Owners of Supportive Housing Units and residential units supported by a Housing Choice tenant-based voucher shall deny admission or terminate PBRA assistance to a Supportive Housing Participant if it is determined that such Supportive Housing Participant:
 - A. Has been evicted from federally assisted housing for drug related criminal activity within the three year period preceding application;
 - B. Is currently engaging in the illegal use of drugs;
 - C. Has ever been convicted of drug-related criminal activity for manufacture or production of methamphetamine on the premises of federally assisted housing;
 - D. Is subject to a lifetime registration requirement under a state sex offender registration program; or
 - E. Is abusing or demonstrates a pattern of abuse of alcohol that may threaten the health, safety, or right to peaceful enjoyment of the premises by other residents.

3. Consistent with the intent of Supportive Housing, the Owner and Service Provider may determine to mitigate factors in a Supportive Housing Participant's history through the provisions set forth in such participant's Service Plan.
4. Notwithstanding the above, Owner retains all rights to terminate assistance for any Supportive Housing Participant who is in noncompliance with the terms and conditions of the lease agreement between Owner and Supportive Housing Participant.

ARTICLE FOUR.

TERM OF RENTAL ASSISTANCE

1. Supportive Housing Participants are eligible for rental assistance for as long as they are a resident of an approved Supportive Housing Unit and continue to comply with the terms and conditions of the Owner's lease agreement and the provisions of the service plan (as applicable) developed by the participant's designated Service Provider.
2. Atlanta Housing Authority, Owners and Service Providers may share information with one another on the denial of admission of Applicants and the termination of Residents in order to coordinate services and ensure the integrity of the Supportive Housing Program.
3. In the event that a Supportive Housing Participant voluntarily moves from the Supportive Housing Unit or the residential unit supported by a Housing Choice tenant-based voucher; or is evicted by the Owner for cause, the rental assistance for such Supportive Housing Participant shall terminate and shall not be transferable.
4. In the event that a Supportive Housing Participant voluntarily withdraws from the care of the Service Provider or fails to comply with the terms and conditions of the Service Plan which results in the participant's removal from the Service Provider's care, the rental assistance for such Supportive Housing Participant shall terminate and shall not be transferable.
 - A. A determination relating to a former Supportive Housing Participant's continued occupancy as an unassisted resident shall be made in accordance with the terms of the Lease and the Service Plan.
 - B. When the rental assistance is terminated for a Supportive Housing Participant in a shared, single-room occupancy or congregate housing Supportive Housing arrangement, the former Supportive Housing Participant must move from the unit in accordance with the terms and conditions of the Lease and Service Plan for such Supportive Housing arrangements.
5. Upon termination or nonrenewal of a Supportive Housing PBRA Agreement, the rental assistance for all Supportive Housing Participants covered by the agreement shall terminate and shall not be transferable.

PART IV - SERVICE PROVIDER ARRANGEMENTS

ARTICLE ONE.

SERVICE PROVIDER AGREEMENT

The Owner and the Service Provider must enter into a Service Provider Agreement that remains active and is fully funded throughout the term of the Supportive Housing PBRA Agreement.

ARTICLE TWO.

APPROVAL OF THE SERVICE PROVIDER

In order to provide supportive services to Supportive Housing Participants in Supportive Housing Units, a Service Provider must be approved by either the Service Coordinator, AHA when there is no Service Coordinator or a state or local agency authorized to make such approvals. If the Service Provider is approved by an authorized state or local agency, the Service Provider shall be required to provide evidence of such approval to the Service Coordinator or AHA when there is no Service Coordinator. When there is a Service Coordinator, the Service Coordinator will ensure that the Service Provider is qualified to provide specialized supportive services geared to the needs of Supportive Housing Participants. The Service Coordinator shall provide a list of approved Service Providers to AHA on a periodic basis or upon AHA's request.

ARTICLE FOUR.

SERVICE DELIVERY COORDINATION

The Owner and Service Provider shall coordinate the delivery of services to Supportive Housing Participants in Supportive Housing Units. When there is a change in the status of a Supportive Housing Participant, the Owner shall notify AHA and the Service Provider shall notify the Service Coordinator and AHA.

ARTICLE THREE.

SERVICE COORDINATOR AGREEMENT

1. AHA may enter into a Service Coordinator Agreement with one or more Service Coordinators in connection with AHA's support of one or more Supportive Housing programs and initiatives.
2. The Service Coordinator Agreement shall set forth the obligations of the Service Coordinator to approve, monitor and evaluate the performance of Service Providers and AHA's role as a subsidy provider for Supportive Housing.
3. Pursuant to the Service Coordinator Agreement, the Service Coordinator shall:
 - A. Ensure that Service Providers are qualified to provide specialized supportive services geared to the needs of Supportive Housing Participants.
 - B. Provide a list of such approved Service Providers to AHA on a periodic basis or upon AHA's request.
 - C. Provide periodic progress reports to AHA regarding the performance of Service Providers in serving the needs of Supportive Housing Participants.
4. AHA and the Service Coordinator will mutually agree on the terms and conditions to be set forth in the Service Coordinator Agreement including provisions for the termination of said agreement.

[END OF CHAPTER 4]

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Form 50900: Elements for the Annual MTW Plan and Annual MTW Report**Attachment B****(I) Introduction****Annual MTW Plan**

A. Table of Contents, which includes all the required elements of the Annual MTW Plan; and

[See Annual Plan: Table of Contents and Appendices Table of Contents](#)

B. Overview of the PHA's short-term and long-term MTW goals and objectives. Short-term goals and objectives include those that the PHA plans to accomplish within the fiscal year. Long-term goals and objectives include those that the PHA plans to accomplish beyond the current fiscal year. PHAs have the ability to define the level of specificity in the short-term and long-term goals and objectives. If PHAs are including non-MTW components in either the short-term or long-term goals and objectives, the PHA should clearly delineate which are MTW and which are non-MTW goals and objectives. PHAs have the flexibility to include references to proposed and ongoing activities in this section if it assists in providing an explanation about short-term and long-term goals and objectives. However, this is not required.

[See Annual Plan: Section I. and Section II.](#)

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

Attachment B

(II) General Housing Authority Operating Information

See Annual Plan: Table of Contents and Appendices Table of Contents

See: Appendix B, FY 2017 MTW Plan Resolution & Certifications

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
None	X	X	X	X	X	X	X	X	None	X	X
Total Public Housing Units to be Added								0			

* Select Population Type from: Elderly, Disabled, General, Elderly/Disabled, Other
If Other, please describe: None

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
GA006000430 Juniper & Tenth Highrise	149	RAD Conversion
N/A	0	N/A
Total Number of Units to be Removed	149	

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
Reynoldstown Senior Residences	26	Senior Community
The Remington	160	Senior Community
The Veranda at Groveway	31	Elderly and Near Elderly Housing
Anticipated Total New Vouchers to be Project-Based	217	Anticipated Total Number of Project-Based Vouchers Committed at the End of the Fiscal Year Anticipated Total Number of Project-Based Vouchers Leased Up or Issued to a Potential Tenant at the End of the Fiscal Year
		<div>5,340</div> <div>5,340</div>

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

Other Changes to the Housing Stock Anticipated During the Fiscal Year

tbd

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

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

AHA established four priorities for FY 2017 capital improvements at the AHA-Owned Residential Communities:

1. Health and safety of residents
2. Property viability
3. Energy conservation
4. Redevelopment through Rental Assistance Demonstration (RAD) or AHA Reformulation for the AHA-Owned Residential Communities or AHA-Sponsored Mixed-Income Communities.

AHA plans the following expenditures for Site/Building Improvements and Furniture, Fixtures & Equipment during FY 2017: \$2,000,000.

The expected sites for the work include all the AHA-Owned Residential Communities: Barge Road Highrise, Cheshire Bridge Road Highrise, Cosby Spear Highrise, East Lake Highrise, Georgia Avenue Highrise, Hightower Manor Highrise, Juniper and Tenth Highrise, Marian Road Highrise, Marietta Road Highrise, Martin Street Plaza, Peachtree Road Highrise, Piedmont Road Highrise, and Westminster.

II.2.Plan.Leasing

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 (PH Units in AHA owned and AHA Sponsored Mixed-Income Communities)	4,014	48,168
Federal MTW Voucher (HCV) Units to be Utilized	15,278	183,336
Number of Units to be Occupied/Leased through Local, Non-Traditional, MTW Funded, Property-Based Assistance Programs **	2,744	32,928
Number of Units to be Occupied/Leased through Local, Non-Traditional, MTW Funded, Tenant-Based Assistance Programs **	488	5,856
Total Households Projected to be Served	22,524	270,288

* Calculated by dividing the planned number of unit months occupied/leased by 12.

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

***Unit Months Occupied/Leased is the total number of months the PHA has leased/occupied units, according to unit category during the fiscal year.

Reporting Compliance with Statutory MTW Requirements

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

None

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
Voucher Program

The vacancy rate in AHA's jurisdiction in multifamily properties is reported at an average of 5%. In light of the tight local rental market, AHA will continue to utilize its MTW flexibility to implement innovative leasing strategies to create additional quality housing opportunities for families.

II.3.Plan.WaitList

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 Public Housing Units (AHA Owned Residential Communities)	Site Based	3,453	Open	Yes
Federal MTW Public Housing & PBRA Units (AHA-Sponsored Mixed-Income Communities)	Site Based	35,578	Open	Yes
Federal MTW Housing Choice Voucher Program (AHA HCV)	Community Wide	6,000	Closed	Yes
Project-Based Local, Non-Traditional MTW Housing Assistance Program (AHA PBRA Communities)	Site Based	7,967	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.

None

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

Using the flexibility authorized under its MTW Agreement, AHA manages occupancy and waiting lists through its various relationships with private developer partners and property management companies. Except for its Housing Choice Tenant-Based Voucher Program which AHA manages directly, partner entities manage all aspects of leasing units and occupancy, including waiting lists, for other AHA communities. For AHA's Project Based Rental Assistance Program and at AHA-Sponsored Mixed-Income Communities, AHA streamlines program activities through site-based administration delivered at the property level. The waiting lists at these communities are administered at the sites by the respective owners and management agents. Each is responsible for the opening, closing, ongoing maintenance and updating the site-based waiting list.

If Other Wait List Type, please describe:

None

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.

None

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

Attachment B

(III) Proposed MTW Activities: HUD approval requested

A. Describe each proposed MTW activity;
B. Describe how each proposed activity will achieve one or more of the three statutory objectives;
C. Identify and discuss the anticipated impact of each proposed MTW activity on the stated objective(s); and
D. Provide the anticipated schedules for achieving the stated objective(s).
E. Provide the metric(s) from the "Standard HUD Metrics" section that will be used to quantify the changes that the PHA anticipates as a result of the MTW activity;
F. Give the baseline performance level for each metric (a numeric value) prior to the implementation of the MTW activity;
G. Give the yearly benchmarks for each metric (a numeric value);
H. Describe the final projected outcome(s) of the MTW activity for each metric;

[See: Appendix H3](#)

(IV) Approved MTW Activities: HUD approval previously granted	
A. IMPLEMENTED ACTIVITIES	
1. List approved, implemented, ongoing activities continued from the prior Plan year(s) that are actively utilizing flexibility from the MTW Agreement; specify the Plan Year in which the activity was first approved and implemented;	<p>See: Appendix H2</p> <p>Many of these multi-year activities were identified and approved by HUD in previous AHA MTW Annual Plans and constitute "ongoing activities" under its MTW authority. Pursuant to AHA's MTW Agreement with HUD, AHA is not requesting additional HUD approval of the activities described in this FY 2017 plan. The progression of activities described herein will be implemented under HUD's previous approvals and/or do not require HUD's approval as an MTW activity.</p>
2. Provide a description of the activity and an update on its status;	
3. Indicate if the PHA anticipates any non-significant changes or modifications to the activity during the Plan year;	
4. Indicate if the PHA anticipates any changes or modifications to the metrics, baselines or benchmarks during the Plan year;	
5. If the PHA requires a different authorization from Attachment C or D when implementing the activity than was initially proposed, the PHA must re-propose the activity and include all required elements in Section (III) Proposed Activities; and	
6. HUD requires PHAs to re-propose activities that require a "significant change." A "significant change" occurs when the nature of the activity has changed such that an additional MTW authorization is needed or when a PHA fundamentally changes the nature and scope of an activity to the extent that there is the potential for a different impact on residents (e.g. changing the calculation of rent). In these cases a new public process is needed for residents to have the opportunity to be informed about the changes to the activity. HUD reserves the right to determine on a case-by-case basis if the change made to an activity crosses this threshold and therefore requires the activity to be re-proposed.	<p>On November 13, 2008, AHA and HUD executed AHA's Amended and Restated MTW Agreement. On January 16, 2009, AHA and HUD executed a further amendment to the Amended and Restated MTW Agreement (collectively, the "Amended and Restated MTW Agreement"), which clarified and expanded AHA's ability to use MTW Funds outside of Section 9 and Section 8 of the U.S. Housing Act of 1937, as amended ("1937 Act"). The Amended and Restated MTW Agreement re-affirmed, in all material respects, all of the authorizations set forth in Appendix A of the Original MTW Agreement and includes these authorizations in Attachment D. AHA has all of the authorizations needed from HUD under the Amended and Restated MTW Agreement to implement the activities described in AHA's FY 2017 MTW Annual Plan.</p>

B. NOT YET IMPLEMENTED ACTIVITIES	
1. Describe any approved activities that were proposed in the Plan, approved by HUD, but have not yet been implemented, and discuss why these activities were not implemented; specify the Plan Year in which the activity was first approved;	See: Appendix H2
2. Provide an update on the plan for implementation of the activity;	
3. Provide a timeline for implementation;	
4. Provide an explanation of any non-significant changes or modifications to the activity since it was approved;	
C. ACTIVITIES ON HOLD	
1. Describe any approved activities that have been implemented that the PHA has stopped implementing but has plans to reactivate in the future; specify the Plan Year in which the activity was first approved, implemented, and placed on hold;	See: Appendix H2
2. Discuss why these activities have been placed on hold;	
3. Provide an update on the plan for reactivating the activity;	
4. Provide a timeline for re-implementation; and	
5. Provide an explanation of any non-significant changes or modifications to the activity since it was approved.	
D. CLOSED OUT ACTIVITIES	
1. List any approved activities that have been closed out, including activities that have never been implemented, that the PHA does not plan to implement and obsolete activities; specify the Plan Year in which the activity was first approved and implemented (if applicable):	See: Appendix H2
2. Explain why these activities were closed out; and	
3. Provide the year the activity was closed out.	

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

Attachment B

(V) Sources and Uses of Funds

Annual MTW Plan

V.1.Plan.Sources and Uses of MTW Funds

See: Appendix B, FY 2017 MTW Plan Resolution & Certifications

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	\$5,524,093
70600	HUD PHA Operating Grants	\$199,147,878
70610	Capital Grants	\$5,000,000
70700 (70710+70720+70730+70740+70750)	Total Fee Revenue	\$0
71100+72000	Interest Income	\$192
71600	Gain or Loss on Sale of Capital Assets	\$0
71200+71300+71310+71400+71500	Other Income	\$608,552
70000	Total Revenue	\$210,280,716

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		
GA006000430	FDS Line Item Name	Dollar Amount
Juniper & Tenth Highrise	Total Operating - Administrative	\$37,547,471
91300+91310+92000	Management Fee Expense	\$1,100,517
91810	Allocated Overhead	\$0
92500 (92100+92200+92300+92400)	Total Tenant Services	\$3,116,001
93000 (93100+93600+93200+93300+93400+93800)	Total Utilities	\$3,299,761
93500+93700	Labor	\$0
94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	\$4,919,049
95000 (95100+95200+95300+95500)	Total Protective Services	\$1,578,059
96100 (96110+96120+96130+96140)	Total insurance Premiums	\$693,025
96000 (96200+96210+96300+96400+96500+96600+96800)	Total Other General Expenses	\$12,779,399
96700 (96710+96720+96730)	Total Interest Expense and Amortization Cost	\$1,658,500
97100+97200	Total Extraordinary Maintenance	\$3,969,826
97300+97350	Housing Assistance Payments + HAP Portability-In	\$139,619,108
N/A	Depreciation Expense	\$10,000,000
97500+97600+97700+97800	All Other Expenses	\$0
90000	Total Expenses	\$220,280,716

Describe the Activities that Will Use Only MTW Single Fund Flexibility

Except for the portion of certain revitalization and development activities outlined below and expenditures requiring non-federal funds, AHA operates all activities as detailed in its FY 2017 MTW Annual Plan using its MTW Single Fund authority.

Pursuant to the authority in AHA's MTW Agreement, AHA has combined its low-income operating funds, Housing Choice voucher funds and certain capital funds into a single fund (referred herein as "MTW Single Fund" or "MTW Funds") which may be expended on MTW Eligible Activities as set forth in AHA's business plan. Under this MTW Single Fund authority, AHA determines the best use of funds for the purposes of fulfilling its mission to deliver innovative, affordable housing. Although the MTW Agreement allows AHA to include RHF funds in the MTW Single Fund, AHA has elected not to do so.

In accordance with Section V.A.1 of Attachment D of AHA's MTW Agreement, AHA is authorized to combine operating subsidies provided under Section 9, capital funding (including development and replacement housing factor funds) provided under Section 9 (formerly Section 14), and assistance provided under Section 8 of the 1937 Act for the voucher programs to fund HUD approved MTW activities.

As detailed in AHA's Comprehensive Budget, AHA funds all operations with MTW Funds except where limited by law or regulation. AHA funds all operations with MTW funds except where other funds are provided for specific purposes (e.g. Replacement Housing Factor funds) or where limited by law or regulation. These funds are augmented by proceeds from National Housing Compliance (a non-federal source of funds) to fund expenditures that cannot be funded with federal funds.

Further, AHA has allocated MTW funds to support MTW-authorized revitalization activities. AHA's revitalization activities are also funded by RHF funds, public improvement funds provided by the City of Atlanta, and program income from prior years.

But for the MTW Single Fund flexibility, AHA would be unable to fund fully the costs of (i) operating the PH-assisted units in its mixed-income, mixed-finance communities, (ii) operating and maintaining the housing AHA owns (consisting primarily of senior high-rises, (iii) funding human development services intended to support fragile populations as well as promote resident self-sufficiency, and (iv) fund AHA's HUD-approved version of project-based rental assistance (PBRA) at communities including both AHA-sponsored mixed-income, mixed-finance properties as well as multi-family communities that are privately owned.

V.2.Plan.Local Asset Management Plan

B. MTW Plan: Local Asset Management Plan

Is the PHA allocating costs within statute?

Yes

or

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

Yes

or

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?

Yes

or

AHA has provided detail on its Local Asset Management Plan (LAMP) in Appendix C

Form 50900: Elements for the Annual MTW Plan and Annual MTW Report	
Attachment B	
(VI) Administrative	
The PHA shall provide the information below with the first Plan/Report submittal to HUD.	
Annual MTW Plan	
A. Resolution signed by the Board of Commissioners, or other authorized PHA official if there is no Board of Commissioners, adopting the Annual MTW Plan Certification of Compliance (provided at the end of this Attachment B);	See: Appendix B, FY 2017 MTW Plan Resolution & Certifications
B. The beginning and end dates of when the Annual MTW Plan was made available for public review, the dates, locations of public hearings and total number of attendees for the draft Annual MTW Plan, (to ensure PHAs have met the requirements for public participation, HUD reserves the right to request additional information to verify PHAs have complied with all requirements as set forth in the Standard MTW Agreement);	See: Appendix B

<p>C. Description of any planned or ongoing PHA-directed evaluations of the demonstration for the overall MTW program or any specific MTW activities, if applicable; and</p>	<p>AHA engaged Emory University's Center for Community Partnerships to conduct a longitudinal, comparative, multi-level assessment of the effects of AHA's MTW program on AHA-assisted families. The focus of the study is to benchmark Atlanta's MTW performance through strengthening inferences about MTW outcomes and their key determinants.</p> <p>Emory University's approach is consistent with national discussion regarding evaluation of the MTW demonstration, which has called for a greater emphasis on studies that "evaluate outcomes and establish cause-and-effect relationships between agencies' policies and recipients' experiences."¹</p>
<p>D. The Annual Statement/Performance and Evaluation Report (HUD 50075.1) or subsequent form required by HUD for MTW and non-MTW Capital Fund grants for each grant that has unexpended amounts, including estimates for the Plan Year and all three parts of the report;</p>	<p>N/A</p>

¹U.S. Government Accountability Office, Moving to Work Demonstration: Opportunities Exist to Improve Information and Monitoring, (Washington, D.C.: GAO-12-490, April 2012).

Appendix H2: Ongoing Activities

BACKGROUND

The Atlanta Housing Authority's (AHA) Ongoing Activities addresses the HUD Form 50900 requirement by listing activities identified in AHA's MTW Annual Implementation Plans ("MTW Annual Plans") since FY 2005. Per AHA's MTW Agreement with HUD on September 23, 2003, the initial period of which was effective from July 1, 2003 through June 30, 2010, and the executed Amended and Restated MTW Agreement, effective as of November 13, 2008, and further amended by that certain Second Amendment to the Moving to Work Agreement, effective as of January 16, 2009, once HUD approves AHA's MTW Annual Plan, the approval is deemed to be cumulative and remains in effect for the duration of the Amended and Restated MTW Agreement period, as it may be extended from time to time.

In June 2014, AHA decided to report its MTW-approved activities in accordance with the HUD Form 50900 – Attachment B and solely for purposes of complying with the substantive information reporting requirements of the Paperwork Reduction Act.

DESCRIPTION

This section includes information for **Section IV: Approved Activities** of the HUD Form 50900. Activities are divided into the following sub-sections: Implemented, Not Yet Implemented, On Hold, and Closed Out.

Each sub-section includes a summary table of activities, year implemented and MTW authorizations, followed by narrative descriptions, HUD Standard Metrics and FY 2016 benchmarks. Per HUD's requirements **"standard metrics must be shown in the table format provided in the 'HUD Standard Metrics' Section of Form 50900."**

PLEASE NOTE: Because the FY 2017 MTW Annual Plan is a forward looking document, there are no observed or recorded FY2017 Outcomes.

EXAMPLE of HUD Standard Metrics:

HC #5: Increase in Resident Mobility		
Unit of Measurement	Baseline	FY2017 Benchmark
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. AHA = 0	Benchmark set in FY 2016 MTW Annual Plan.

HUD-required metric and unit of measure for this type of activity

*AHA-reported figures or definitions in **BOLD** type*

FY 2017 benchmarks figures as determined by AHA.

A. Approved MTW Activities: HUD Approval Previously Granted

The MTW activity number indicates the functional area and fiscal year in which the activity was approved in AHA's MTW Plan. **Key:** AW – Agency-wide; HC – Housing Choice; HD – Human Development; PH – Public Housing; RE – Real Estate; SH – Supportive Housing.

Implemented Activities			
Activity #	Activity	Fiscal Year Impl.	MTW Authorization(s)
AW.2005.01	\$125 Minimum Rent	2005	Attachment D, Section I.O: General Conditions
PH.2005.07	4 to 1 Elderly Admissions Policy at AHA's High-Rise Communities	2005	Attachment D, Section III: Occupancy Policies Attachment D, Section IV: Self-Sufficiency/Supportive Services
SH.2005.08	Affordable Assisted Living Demonstration	2005	Attachment D, Section V: Single Fund Budget with Full Flexibility Attachment D, Section VII. B: Simplification of the Process to Project Based Section 8 Vouchers Attachment D, Section VII. C: Simplification of the Development and Redevelopment Process
PH.2011.03	Aging Well Program	2011	Attachment D, Section IV: Self-Sufficiency/Supportive Services Attachment D, Section V: Single Fund Budget with Full Flexibility
HC.2006.01	AHA Submarket Payment Standards	2006	Attachment D, Section VII: Establishment of Housing Choice Voucher Program
RE.2007.03	Comprehensive Homeownership Program	2007	Attachment D, Section V: Single Fund Budget with Full Flexibility
SH.2005.09	Developing Alternative & Supportive Housing Resources	2005	Attachment D, Section V: Single Fund Budget with Full Flexibility Attachment D, Section VII. B: Simplification of the Process to Project Based Section 8 Vouchers Attachment D, Section VII. C: Simplification of the Development and Redevelopment Process
AW.2005.02	Elderly Income Disregard	2005	Attachment D, Section I.O: General Conditions
PH.2008.03	Energy Performance Contracting	2010	Attachment D, Section IX: Energy Performance Contracting
HC.2005.04	Enhanced Inspection Standards	2005	Attachment D, Section VII: Establishment of Housing Choice Voucher Program
RE.2005.11	Gap Financing	2005	Attachment D, Second Amendment, Section 2: Use of MTW Funds Second Amendment, Section 3: Reinstatement of "Use of MTW Funds" Implementation Protocol
HD.2005.05	Good Neighbor Program II	2005	Attachment D, Section IV: Self-Sufficiency/Supportive Services Attachment D, Section V: Single Fund Budget with Full Flexibility
HC.2011.02	Housing Choice Voucher Program HAP Abatement Policy	2011	Attachment D, Section VII: Establishment of Housing Choice Voucher Program

Activity #	Activity	Fiscal Year Impl.	MTW Authorization(s)
HD.2005.06	Human Development Services	2005	Attachment D, Section IV: Self-Sufficiency/Supportive Services Attachment D, Section V: Single Fund Budget with Full Flexibility
HC.2008.02	Leasing Incentive Fee (LIF)	2007	Attachment D, Section VII: Establishment of Housing Choice Voucher Program
AW.2011.01	Non-Elderly Disabled Income Disregard	2011	Attachment D, Section I.O: General Conditions
RE.2007.04	Project Based Rental Assistance as a Strategic Tool	2007	Attachment D, Section V: Single Fund Budget with Full Flexibility Attachment D, Section VII. B: Simplification of the Process to Project Based Section 8 Vouchers Attachment D, Section VII. C: Simplification of the Development and Redevelopment Process
RE.2006.02	Project Based Rental Assistance Site Based Administration	2006	Attachment D, Section V: Single Fund Budget with Full Flexibility Attachment D, Section VII. B: Simplification of the Process to Project Based Section 8 Vouchers Attachment D, Section VII. C: Simplification of the Development and Redevelopment Process
HC.2007.01	Re-engineering the Housing Choice Voucher Program	2008	Attachment D, Section V: Single Fund Budget with Full Flexibility Attachment D, Section VII: Establishment of Housing Choice Voucher Program Attachment D, Section VII. B: Simplification of the Process to Project Based Section 8 Vouchers Attachment D, Section VII. C: Simplification of the Development and Redevelopment Process
RE.2005.09	Reformulating the Subsidy Arrangement in AHA-Sponsored Mixed-Income, Mixed-Finance Communities including Centennial Place and AHA's Affordable Communities	2005	Attachment D, Section V: Single Fund Budget with Full Flexibility Attachment D, Section VII. C: Demonstration Program on Project Based Financing
HC.2007.02	Rent Reasonableness	2011	Attachment D, Section VII: Establishment of Housing Choice Voucher Program
AW.2008.01	Rent Simplification / AHA Standard Deductions	2010	Attachment D, Section I.O: General Conditions
RE.2005.10	Revitalization Program	2005	Attachment D, Section V: Single Fund Budget with Full Flexibility Attachment D, Section VII. B: Simplification of the Process to Project Based Section 8 Vouchers Attachment D, Section VII. C: Simplification of the Development and Redevelopment Process
RE.2012.01	Single Family Home Rental Demonstration	2013	Attachment D, Section V: Single Fund Budget with Full Flexibility

Activity #	Activity	Fiscal Year Impl.	MTW Authorization(s)
SH.2013.01	Veterans Supportive Housing	2013	Attachment D, Section IV: Self-Sufficiency/Supportive Services Attachment D, Section V: Single Fund Budget with Full Flexibility
AW.2005.03	Work/Program Requirement	2005	Attachment D, Section I.O: General Conditions Attachment D, Section IV: Self-Sufficiency/Supportive Services

AW.2005.01 – \$125 MINIMUM RENT

DESCRIPTION

Effective October 1, 2004 (FY 2005), AHA raised its minimum rent from \$25 to \$125 for its Public Housing and Housing Choice programs. This rent policy does not apply to households where all members are either elderly or disabled and living on a fixed income, in which case their total tenant payment continues to be based on 30% of their adjusted gross income.

Mixed-income, mixed-finance rental communities, including AHA-assisted units and Project Based Rental Assistance (PBRA) units, in private developments are developed through public-private partnerships and are managed by the owner entity's professional property management agent. While AHA does not own these communities, AHA engages the respective owner entities and their property management agents in its capacity as both a partner and asset manager by actively monitoring performance, reviewing monthly and quarterly reports, making site visits and consulting with management agent representatives with respect to management and maintenance performance, financial oversight and occupancy tracking. Management agents are responsible for implementing AHA housing policies.

Because AHA's housing model has continued to evolve to include mixed-income and PBRA communities, starting in FY 2017, AHA will include these other communities in its reporting.

IMPACT

AHA's family policy initiatives such as the work requirement are aligned with standards set in the private sector. These policies are intended to prepare AHA's families to live in market-rate, mixed-income communities. Since raising the minimum rent, the number of families paying minimum rent has steadily decreased as adults move into the workforce. Families are becoming more economically self-sufficient which also allows them to be more competitive within the job market and housing arenas.

IMPLEMENTATION YEAR

This activity was approved in the FY 2005 MTW Annual Plan. Implementation began in FY 2005.

CHANGES TO METRICS, BASELINE, OR BENCHMARK

There have been no changes to the metrics or baseline assumptions. The calculations for FY 2017 include AHA-Sponsored Mixed-Income and PBRA communities. Any changes in quantities, magnitude or value of FY 2017 benchmarks are due to normal year-to-year fluctuations in residents, households, or units that form the basis of inputs into the calculations.

CE #5: Increase in Agency Rental Revenue		
Unit of Measurement	Baseline	FY2017 Benchmark
Rental revenue in dollars (increase).	Rental revenue prior to implementation of the activity (in dollars). AHA = \$25 rent x 2,272 PH and HC households x 12 = \$681,000 approx. (FY 2006).	Expected rental revenue after implementation of the activity (in dollars) = \$125 rent x 719 (PH + HC+ MIMF + PBRA households) x 12 = \$1.1 million resulting in increased rental revenue and greater HAP savings of \$863,000 approx.

PH.2005.07 – 4-TO-1 ELDERLY ADMISSIONS POLICY AT AHA'S HIGH-RISE COMMUNITIES

DESCRIPTION

AHA implemented an admissions policy that applies to public housing-assisted units in communities for elderly (62 years or older), almost elderly (55 to 61 years old) and non-elderly disabled and allows the admission of four elderly or almost elderly applicants from the waiting list before admitting a non-elderly disabled applicant. This policy helps to create an optimal mix of elderly, almost elderly and non-elderly disabled residents in a community.

IMPACT

Implementation of this policy has helped reach an optimal mix of elderly and non-elderly disabled residents in the AHA-Owned high-rise communities, which has helped create an improved quality of life for all residents. All residents have a greater ability to access services and resources needed to be engaged and in control of decisions that affect their lives and the aging process.

IMPLEMENTATION YEAR

This activity was approved in the FY 2005 MTW Annual Plan. Implementation began in FY 2005.

CHANGES TO METRICS, BASELINE, OR BENCHMARK

There have been no significant changes to the metrics, baseline, or benchmark assumptions and calculations for FY 2017. Any changes in quantities, magnitude or value of FY 2017 benchmarks are due to normal year-to-year fluctuations in residents, households, or units that form the basis of inputs into the calculations.

In AHA-Owned Residential Communities which are undergoing conversions from Section 9 to Section 8 subsidy as part of RAD or AHA's Reformulation Initiative and the residents have been relocated, the households are not included in the benchmark during the transition.

SS #8: Households Transitioned to Self Sufficiency		
Unit of Measurement	Baseline	FY2017 Benchmark
Number of households transitioned to self-sufficiency (increase).	Households transitioned to self-sufficiency (defined as the ability to access services and resources needed to be engaged, active and in control of decisions that affect their lives and the aging process) prior to implementation of the activity (number). This number may be zero. AHA = 0 (FY 2005)	Expected households transitioned to self-sufficiency (AHA defines as the ability to access services and resources needed to be engaged, active and in control of decisions that affect their lives and the aging process) after implementation of the activity (number) = 1,685 households in the AHA-Owned communities

SH.2005.08 – AFFORDABLE ASSISTED LIVING DEMONSTRATION

DESCRIPTION

AHA will explore strategies to create affordable assisted living opportunities for low-income elderly persons and persons with disabilities, and to leverage resources with Medicaid Waivers or other service funding.

Early proposals to the State of Georgia Department of Human Resources (DHR) would have allowed elderly residents to age-in-place, provide alternatives to costly nursing home care, and reduce Medicaid budget expenditures. At the Gardens at CollegeTown, AHA and its development partner created 26 units that are designated for persons with mental and developmental disabilities. As part of the programming for this community, the Owner Entity provides service coordination and had considered Medicaid waivers for personal support services, but has been unsuccessful with this approach. Concurrently, AHA and its development partner have pursued development of alternative living services in a licensed personal care home in a newly constructed mid-rise building financed using LIHTC.

IMPACT

Construction was completed and began occupancy in FY 2015 at Oasis at Scholars Landing. The development provides 60 affordable assisted rental units for seniors, targeting veterans who can use Aid and Attendance benefits from the U.S. Veterans Administration to cover the cost of support services. AHA will continue exploring opportunities to use Medicaid funds for assisted-living supportive services.

IMPLEMENTATION YEAR

This activity was approved in the FY 2005 MTW Annual Plan. Implementation began in FY 2005.

CHANGES TO METRICS, BASELINE, OR BENCHMARK

There have been no changes to the metrics, baseline, or benchmark assumptions and calculations for FY 2017. Any changes in quantities, magnitude or value of FY 2017 benchmarks are due to normal year-to-year fluctuations in residents, households, or units that form the basis of inputs into the calculations.

HC #1: Additional Units of Housing Made Available		
Unit of Measurement	Baseline	FY2017 Benchmark
Number of new housing units made available for households at or below 80% AMI as a result of the activity (increase).	Housing units of this type prior to implementation of the activity (number). This number may be zero. AHA = 0 (FY 2005)	Expected housing units of the type after implementation of the activity (number) = 0 units
HC #7: Households Assisted by Services that Increase Housing Choice		
Unit of Measurement	Baseline	FY2017 Benchmark
Number of households receiving services aimed to increase housing choice (increase).	Households receiving this type of service prior to implementation of the activity (number). This number may be zero. AHA = 0 (FY 2005)	Expected number of households receiving these services after implementation of the activity (number) = 0 households

PH.2011.03 – AGING WELL PROGRAM

DESCRIPTION

In support of AHA's efforts to enhance the delivery of case management and supportive services to elderly and persons with disabilities in AHA high-rise communities, AHA in collaboration with Atlanta Regional Commission Area Agency on Aging and other partners, implemented a place-based supportive services pilot using the NORC (Naturally Occurring Retirement Community) model. The NORC is a national program model focused on enabling adults to "age in place" and builds the community capacity to support the process. A strong emphasis is placed on resident involvement with priorities set by residents and new initiatives that capitalize on the economy of scale created by the concentration of individuals with similar needs.

Using lessons learned from the NORC program model and recognizing that there are higher percentages of active older adults who want to maintain their quality of life, AHA introduced the expanded Aging Well program in 2011 to provide our residents with vibrant physical spaces, active programming, and enhanced opportunities for socialization, learning, and wellness. AHA work with the PMDs network of service providers and local universities: (i) to provide activities and learning experiences for the residents that address the "7 Dimensions of Whole Person Wellness," and (ii) to connect residents with resources to support their physical and mental wellness.

IMPACT

Compared to the baseline prior to implementation, all AHA-Owned high-rise residents now have the ability to access services and resources needed to be engaged and in control of decisions that affect their lives and the aging process.

While not considered an MTW Activity, AHA's use of American Recovery and Reinvestment Act (ARRA) funds to renovate the AHA-Owned Residential Communities was informed by the Aging Well strategy. The \$20 million renovations included:

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

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

AHA will continue to promote active aging at the AHA-Owned Residential Communities balancing this initiative with the limited funding for operating and managing the properties.

IMPLEMENTATION YEAR

This activity was approved in the FY 2011 MTW Annual Plan. Implementation began in FY 2011.

CHANGES TO METRICS, BASELINE, OR BENCHMARK

There have been no significant changes to the metrics, baseline, or benchmark assumptions and calculations for FY 2017. Any changes in quantities, magnitude or value of FY 2017 benchmarks are due to normal year-to-year fluctuations in residents, households, or units that form the basis of inputs into the calculations.

In AHA-Owned Residential Communities which are undergoing conversions from Section 9 to Section 8 subsidy as part of RAD or AHA's Reformulation Initiative and the residents have been relocated, the households are not included in the benchmark during the transition.

SS #8: Households Transitioned to Self Sufficiency		
Unit of Measurement	Baseline	FY2017 Benchmark
Number of households transitioned to self-sufficiency (increase).	Households transitioned to self-sufficiency (defined as the ability to access services and resources needed to be engaged, active and in control of decisions that affect their lives and the aging process) prior to implementation of the activity (number). This number may be zero. AHA = 0 (FY 2011)	Expected households transitioned to self-sufficiency (defined as the ability to access services and resources needed to be engaged, active and in control of decisions that affect their lives and the aging process) after implementation of the activity (number) = 1,685 elderly and disabled households

SS #5: Households Assisted by Services that Increase Self Sufficiency		
Unit of Measurement	Baseline	FY2017 Benchmark
Number of households receiving services aimed to increase self-sufficiency (increase).	Households receiving self-sufficiency services prior to implementation of the activity (number). AHA = 0 (FY 2011)	Expected number of households receiving self-sufficiency services after implementation of the activity (number) = 1,685 elderly and disabled households

HC.2006.01 – AHA SUBMARKET PAYMENT STANDARDS

DESCRIPTION

Using a third-party real estate market research firm, AHA developed its own Payment Standards based on local market conditions and identified submarkets that exist within the City of Atlanta. Separate payment standard schedules were implemented for each of the identified seven submarkets upon establishment of new HAP contracts and at the recertification of existing contracts.

IMPACT

By aligning its payment standards in the City of Atlanta, market rents for a particular neighborhood are not skewed by subsidy paid by AHA in that neighborhood. The realignment of the rents also allows AHA to better manage its subsidy allocation so that AHA can provide more housing opportunities in low poverty and less impacted areas. Based on market studies conducted in FY 2016, AHA will introduce updated sub-market payment standards which have been expanded from 7 to 23 sub-markets. These new payment standards reflect the dramatic changes in the Atlanta real estate market since 2007. AHA will closely monitor the effects of these changes on HAP costs and lease-up rates.

IMPLEMENTATION YEAR

This activity was approved in the FY 2006 MTW Annual Plan. Implementation began in FY 2006.

CHANGES TO METRICS, BASELINE, OR BENCHMARK

There have been no changes to the metrics, baseline, or benchmark assumptions and calculations for FY 2017. Any changes in quantities, magnitude or value of FY 2017 benchmarks are due to normal year-to-year fluctuations in residents, households, or units that form the basis of inputs into the calculations.

HC #5: Increase in Resident Mobility		
Unit of Measurement	Baseline	FY2017 Benchmark
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. AHA = 0 (FY 2006)	Expected households able to move to a better unit and/or neighborhood of opportunity after implementation of the activity (number) = 1,429 households

HC #1: Additional Units of Housing Made Available		
Unit of Measurement	Baseline	FY2017 Benchmark
Number of new housing units made available for households at or below 80% AMI as a result of the activity (increase).	Housing units of this type prior to implementation of the activity (number). This number may be zero. AHA = 0 (FY 2006)	Expected housing units of this type after implementation of the activity (number) = Number of units on AHA HCVP over the HUD FMR standards: 1,429 units

RE.2007.03 – COMPREHENSIVE HOMEOWNERSHIP PROGRAM

DESCRIPTION

AHA will continue implementing its Comprehensive Homeownership Program which develops affordable homeownership opportunities in healthy, mixed-income communities and prepares low- to moderate-income families in becoming successful homeowners utilizing the following approaches:

- (1) Housing Choice Voucher Homeownership Program provides mortgage payment assistance to qualified Housing Choice clients seeking homeownership.
- (2) Down Payment Assistance for first-time home buyers throughout the City of Atlanta in the form of a subordinated mortgage loan to households that earn up to 80 percent (or 115 percent depending on the funding source) of the metropolitan Atlanta area median income (AMI).

IMPACT

AHA's homeownership program increases affordable homeownership opportunities for low-income families and helps to reduce the excess inventory of newly constructed single family units in the market. AHA further increases homeownership opportunities by leveraging other state and local down payment assistance programs and available funds. To date, AHA has assisted more than 400 first-time, low-income homebuyers through its various Down Payment Assistance programs.

IMPLEMENTATION YEAR

This activity was approved in the FY 2007 MTW Annual Plan. Implementation began in FY 2007.

CHANGES TO METRICS, BASELINE, OR BENCHMARK

There have been no changes to the metrics, baseline, or benchmark assumptions and calculations for FY 2017. Any changes in quantities, magnitude or value of FY 2017 benchmarks are due to normal year-to-year fluctuations in residents, households, or units that form the basis of inputs into the calculations.

HC #1: Additional Units of Housing Made Available		
Unit of Measurement	Baseline	FY2017 Benchmark
Number of new housing units made available for households at or below 80% AMI as a result of the activity (increase).	Housing units of this type prior to implementation of the activity (number). This number may be zero. AHA = 0 (FY 2007)	Expected housing units of this type after implementation of the activity (number) = 10 units

HC #6: Increase in Homeownership Opportunities		
Unit of Measurement	Baseline	FY2017 Benchmark
Number of households that purchased a home as a result of the activity (increase).	Number of households that purchased a home prior to implementation of the activity (number). This number may be zero. AHA = 0 (FY 2007)	Expected number of households that purchased a home after implementation of the activity (number) = 10 households

SS #8: Households Transitioned to Self Sufficiency		
Unit of Measurement	Baseline	FY2017 Benchmark
Number of households transitioned to self-sufficiency (increase).	Households transitioned to self-sufficiency (defined as households with sufficient income and savings to maintain a mortgage without subsidy) prior to implementation of the activity (number). This number may be zero. AHA = 0 households (FY 2007)	Expected households transitioned to self-sufficiency (defined as households with sufficient income and savings to maintain a mortgage without subsidy) after implementation of the activity (number) = 6 households

SH.2005.09 – DEVELOPING ALTERNATIVE & SUPPORTIVE HOUSING RESOURCES

DESCRIPTION

AHA will continue developing and implementing alternative and supportive housing resources for income-eligible families. Resources include Elderly Designated Housing, Special Needs Designated Housing for Persons with Disabilities, Affordable Assisted Living or other supportive housing initiatives.

The purpose of supportive housing is to provide at-risk populations – who are often homeless or soon-to-be homeless – with a stable housing arrangement that includes intensive, often specialized support services that address individual needs. At-risk populations include homeless individuals and families, persons with physical, mental or developmental disabilities, military veterans, families separated due to the lack of housing, youth aging out of foster care, and other target groups that need quality, affordable housing.

In support of citywide and nationwide efforts to reduce and prevent homelessness, AHA will continue to use its MTW flexibility and funds to explore various rent reforms and additional homelessness initiatives and pilots. AHA will also continue to collaborate with the United Way of Greater Atlanta, the City of Atlanta Continuum of Care (CoC), the U.S. Department of Veterans Affairs, HUD, Georgia Division of Family and Children Services, and various state and local entities to address the housing needs of various at-risk populations.

IMPACT

Using its MTW flexibility to partner with the private sector, government agencies, and the service provider community, AHA has created multiple solutions to address the various local housing needs of at-risk populations. These solutions include its tenant-based supportive housing pilot, short-term housing assistance pilot, conversion of the Georgia Housing Vouchers. While the Family Unification Program and Veterans Affairs Supportive Housing special purpose vouchers are not MTW Activities, AHA has continued to expand its use of these programs to support its supportive housing objectives.

IMPLEMENTATION YEAR

This activity was approved in the FY 2005 MTW Annual Plan. Implementation began in FY 2005.

CHANGES TO METRICS, BASELINE, OR BENCHMARK

There have been no changes to the metrics, baseline, or benchmark assumptions and calculations for FY 2017. Any changes in quantities, magnitude or value of FY 2017 benchmarks are due to normal year-to-year fluctuations in residents, households, or units that form the basis of inputs into the calculations.

HC #1: Additional Units of Housing Made Available		
Unit of Measurement	Baseline	FY2017 Benchmark
Number of new housing units made available for households at or below 80% AMI as a result of the activity (increase).	Housing units of this type prior to implementation of the activity (number). This number may be zero. AHA = 0 (FY 2005)	Expected housing units of this type after implementation of the activity (number) = 50 new units

HC #7: Households Assisted by Services that Increase Housing Choice		
Unit of Measurement	Baseline	FY2017 Benchmark
Number of households receiving services aimed to increase housing choice (increase).	Households receiving this type of service prior to implementation of the activity (number). This number may be zero. AHA = 0 (FY 2005)	Expected number of households receiving these services after implementation of the activity (number) = 50 households

AW.2005.02 – ELDERLY INCOME DISREGARD

DESCRIPTION

AHA amended its Income Disregard policy to include when determining annual household income, AHA will disregard the employment income of an Elderly Person or Disabled Person whose source(s) of income are Social Security, SSI, and/or other similar fixed income received from a verified plan ("Annual Fixed Income"). For those cases in which the Annual Fixed Income is not the primary source of income, Atlanta Housing Authority, in its discretion, may establish a limit on the amount of employment income that may be disregarded. Any employment income that is not disregarded will be included in annual household income for purposes of calculating Total Tenant Payment.

This policy will be applicable to all AHA housing assistance programs and serve as the replacement for applicable HUD rules and regulations.

IMPACT

Compared to baseline, the number of households with working elderly persons has increased. The increase in working elderly households took place largely in the first few years after implementation of the policy. Each year this number seems to trend upward slightly. Most importantly, individuals who choose to work may improve their quality of life and an increased level of self-sufficiency. This policy complements AHA's Aging Well strategy by encouraging elderly individuals to maintain their engagement in their communities.

IMPLEMENTATION YEAR

This activity was approved in the FY 2005 MTW Annual Plan. Implementation began in FY 2005.

CHANGES TO METRICS, BASELINE, OR BENCHMARK

There have been no changes to the metrics, baseline, or benchmark assumptions and calculations for FY 2017. Any changes in quantities, magnitude or value of FY 2017 benchmarks are due to normal year-to-year fluctuations in residents, households, or units that form the basis of inputs into the calculations.

SS #8: Households Transitioned to Self Sufficiency		
Unit of Measurement	Baseline	FY2017 Benchmark
Number of households transitioned to self-sufficiency (increase).	Households transitioned to self-sufficiency (defined as elderly persons who have earned income) prior to implementation of the activity (number). This number may be zero. AHA = 26 households (FY 2005)	Expected households transitioned to self-sufficiency (defined as elderly persons who have earned income) after implementation of the activity (number) = 130 households

PH.2008.03 – ENERGY PERFORMANCE CONTRACTING

DESCRIPTION

AHA continues to employ energy conservation and efficiency standards, practices and improvements to its properties while enhancing the quality of the living environment for its residents. AHA is utilizing an Energy Performance Contract (EPC) to facilitate upgrades at its AHA-Owned Residential Communities as well as pursuing other funding for green initiatives.

Under AHA's MTW Agreement (*Attachment D, Section IX*), AHA or its agents may, without prior HUD approval, enter into energy performance contracts (EPCs) with Energy Service Companies (ESCOs) and make local determinations of the terms and conditions of EPCs, including the debt service source, in order to satisfy reasonable financing requirements, provided that with respect to each contract the term does not exceed twenty (20) years and at least 50% of the energy cost savings are used to pay financing and debt service costs. AHA is authorized to keep the savings under an EPC up to 50 percent of cost savings, which is above the 25 percent cost savings allowed for non-MTW housing authorities.

Working with Johnson Controls, in FY 2011 AHA implemented its second energy performance contract (EPC) which combines a \$9.1 million EPC loan with additional MTW funds. Through the EPC project AHA serviced newer HVAC systems in the buildings, replaced the older systems with new more energy efficient systems, upgraded bathrooms with new sinks, light fixtures, low-flow faucets and showerheads, toilets and compact fluorescent lights.

IMPACT

These capital improvements complement and supplement the ARRA renovations begun in FY 2010 and accelerate AHA's ability to continue the physical improvements designed to support delivery of vibrant "aging well" programs for its residents. The savings have been higher than anticipated due to the success of the energy conservation measures while program costs remained approximately the same as anticipated. Because of AHA's MTW relief, AHA is able to keep the savings for other improvements and services.

IMPLEMENTATION YEAR

This activity was approved in the FY 2008 MTW Annual Plan. Implementation began in FY 2010.

CHANGES TO METRICS, BASELINE, OR BENCHMARK

There have been no changes to the metrics, baseline, or benchmark assumptions and calculations for FY 2017. Any changes in quantities, magnitude or value of FY 2017 benchmarks are due to normal year-to-year fluctuations in residents, households, or units that form the basis of inputs into the calculations.

CE #1: Agency Cost Savings		
Unit of Measurement	Baseline	FY2017 Benchmark
Total cost of task in dollars (decrease).	Cost of task prior to implementation of the activity (in dollars). AHA = 0 (FY 2011)	Expected cost of task after implementation of the activity (in dollars) = \$50,000 cost savings AHA is allowed to keep under its MTW Agreement.

HC.2005.04 – ENHANCED INSPECTION STANDARDS

DESCRIPTION

Components of AHA's Enhanced Real Estate Inspection systems include: inspections for single family, duplex, triplex and quadraplex units that include pre-contract assessments; initial inspections for property inclusion in the HC program; annual property and unit inspections; special inspections as initiated by participant, landlord or neighbors related to health and safety issues; and Quality Control inspections used to re-inspect properties that have passed or failed previous inspections.

AHA will continue enhancing its inspection standards and processes to improve the delivery of quality affordable housing to Housing Choice participants, in a tight real estate market, AHA has recognized some inefficiencies. As a result, AHA reviewed and streamlined its Enhanced Inspections Standards to better align with private rental market practices and reduce administrative burden, where feasible. For example, AHA eliminated the requirement for landlords to provide gas certifications at the initial inspection. Gas certifications are only required at the inspector's discretion, such as when a gas appliance is not accessible. AHA also revised its Site & Vicinity standard to make the determination clearer for landlords.

IMPACT

Enhanced real estate inspections have improved the quality and safety of AHA's families' homes.

IMPLEMENTATION YEAR

This activity was approved in the FY 2005 MTW Annual Plan. Implementation began in FY 2005.

CHANGES TO METRICS, BASELINE, OR BENCHMARK

There have been no changes to the metrics, baseline, or benchmark assumptions and calculations for FY 2017. Any changes in quantities, magnitude or value of FY 2017 benchmarks are due to normal year-to-year fluctuations in residents, households, or units that form the basis of inputs into the calculations.

HC #1: Additional Units of Housing Made Available		
Unit of Measurement	Baseline	FY2017 Benchmark
Number of new housing units made available for households at or below 80% AMI as a result of the activity (increase).	Housing units of this type prior to implementation of the activity (number). This number may be zero. AHA = 0 (FY 2005)	Expected housing units of this type after implementation of the activity (number) = 7,942 units

RE.2005.11 – GAP FINANCING

DESCRIPTION

AHA supports the financial closings of mixed-income rental communities that serve low-income families (earning less than 80% of Area Median Income) to include Tax Credit, Project Based Rental Assisted-units and public housing assisted-units. Gap financing alleviates the challenges in identifying investors and funders for proposed real estate development projects.

IMPACT

Gap financing facilitates financial closings in development projects, thereby creating new affordable housing opportunities. In FY 2015, gap financing facilitated completion of Oasis at Scholars Landing, a 60-unit affordable assisted living community. In FY 2017, AHA will provide gap financing for the RAD conversion of Juniper and Tenth Highrise.

IMPLEMENTATION YEAR

This activity was approved in the FY 2005 MTW Annual Plan. Implementation began in FY 2005.

CHANGES TO METRICS, BASELINE, OR BENCHMARK

There have been no changes to the metrics, baseline, or benchmark assumptions and calculations for FY 2017. Any changes in quantities, magnitude or value of FY 2017 benchmarks are due to normal year-to-year fluctuations in residents, households, or units that form the basis of inputs into the calculations.

HC #1: Additional Units of Housing Made Available		
Unit of Measurement	Baseline	FY2017 Benchmark
Number of new housing units made available for households at or below 80% AML as a result of the activity (increase).	Housing units of this type prior to implementation of the activity (number). This number may be zero. AHA = 0 (FY 2011)	Expected number of housing units of this type after implementation of the activity (number) = 149 units

HD.2005.05 – GOOD NEIGHBOR PROGRAM II

DESCRIPTION

AHA's Good Neighbor Program (GNP) is an instructional program established by AHA and taught by Georgia State University (GSU). The curriculum includes training on the roles and responsibilities of being a good neighbor after relocating to amenity-rich neighborhoods. AHA leverages MTW Funds with GSU resources to support the implementation of this program.

The program expanded its coursework to include a certification requirement for participants under three "real life" issues: (1) conflict resolution and problem solving; (2) community expectations – "It takes a Village"; and, (3) valuing life-long education. Also referred to as "Empowering S.E.L.F."

All households that receive a Housing Choice voucher are required to attend GNP.

IMPACT

Providing training under the Good Neighbor Program prepares families to be successful neighbors. The continuation of Human Services and Support Services also assists with the successful transition of assisted families into their new neighborhoods and as contributing members of their communities.

IMPLEMENTATION YEAR

This activity was approved in the FY 2005 MTW Annual Plan. Implementation began in FY 2005.

CHANGES TO METRICS, BASELINE, OR BENCHMARK

There have been no changes to the metrics, baseline, or benchmark assumptions and calculations for FY 2017. Any changes in quantities, magnitude or value of FY 2017 benchmarks are due to normal year-to-year fluctuations in residents, households, or units that form the basis of inputs into the calculations.

SS #5: Households Assisted by Services that Increase Self Sufficiency		
Unit of Measurement	Baseline	FY2017 Benchmark
Number of households receiving services aimed to increase self-sufficiency (increase).	Households receiving self-sufficiency services prior to implementation of the activity (number). AHA = 0 (FY 2005)	Expected number of households receiving self-sufficiency services after implementation of the activity (number) = 800 households

HC.2011.02 – HOUSING CHOICE VOUCHER PROGRAM HAP ABATEMENT POLICY

DESCRIPTION

AHA, in its discretion, may develop and implement procedures and practices governing the abatement of housing assistance payments payable to owners in the event a rental unit assisted under the HCVP fails to comply with AHA's Inspection Standards. The procedures and practices established under this policy are set forth in the HCVP operating procedures and implemented as a substitute for any applicable HUD rules and regulations.

IMPACT

AHA has continued to professionalize its relationships with landlords. As a result of elevating expectations and standards for accountability and a higher quality product, the private sector real estate community has responded in kind. These positive changes have resulted in a higher caliber of units and landlords participating in the program who are attracted to AHA's streamlined way of doing business. By becoming a better and more astute business partner, AHA has begun to reposition the Housing Choice program as an asset in the broader Atlanta community.

IMPLEMENTATION YEAR

This activity was approved in the FY 2011 MTW Annual Plan. Implementation began in FY 2011.

CHANGES TO METRICS, BASELINE, OR BENCHMARK

There have been no changes to the metrics, baseline, or benchmark assumptions and calculations for FY 2017. Any changes in quantities, magnitude or value of FY 2017 benchmarks are due to normal year-to-year fluctuations in residents, households, or units that form the basis of inputs into the calculations.

CE #5: Increase in Agency Rental Revenue		
Unit of Measurement	Baseline	FY2017 Benchmark
Rental revenue in dollars (increase) = HAP savings	Rental revenue prior to implementation of the activity (in dollars). AHA = 0 (FY 2011)	Expected rental revenue after implementation of the activity (in dollars) = Expected HAP savings based on 288 units = \$540,000

HD.2005.06 – HUMAN DEVELOPMENT SERVICES

DESCRIPTION

AHA continues to utilize its MTW flexibility to facilitate self-sufficiency of households participating in its Housing Choice Voucher Program with particular emphasis on the following population segments:

1. Working-age Adults - AHA's Human Development Strategy will primarily focus on assisting households to become compliant with its Work/Program Participation requirement by providing human development case management services and connecting household members to specialized supportive services provided by organizations contracted by AHA;
2. Elderly and Disabled Adults - providing supportive services for aging in place and independent living; and,
3. Children (0-5) and Youth (6-17) - advancing educational success and opportunities.

In FY 2014, AHA began utilizing an expanded Human Development Services staff (including two Family Self-Sufficiency Program funded coordinators) to assess the specific needs of the whole family in support of Target Adults transitioning to the workforce. Recognizing that chronic unemployment may be related to long-term, complex barriers, AHA refers the families “most in need” to contracted service providers that specialize in particular issues. AHA staff provide service coordination, monitor the family’s progress, and provide guidance for up to 12 months.

For families whose reasons for unemployment may be related to other issues, such as job skills development or access to quality affordable child care, AHA has expanded its Service Provider Network to include 126 community organizations that address a broad spectrum of support services, including services that address the needs of senior and disabled household members. AHA staff also conduct resource briefings and workshops on topics such as résumé writing and how to enter the Georgia’s state child care lottery.

AHA will continue to utilize its MTW Single Fund to support its human development services initiatives.

IMPACT

AHA’s philosophy for supporting families through the process of positive transformation is premised on a belief that all members, but especially non-elderly, non-disabled adult members, can and should contribute to the community, and that communities should provide a nurturing environment for such contribution. AHA’s human development approach has been developed from numerous lessons learned in similar human and community development situations and believes that it is important to offer support to all members of the family balanced with clear information about individual responsibilities. As a result, the human development process is designed to counsel, coach and educate. Providing the human development intervention and guidance for the next generation will ensure a better chance for individual success, thereby, resulting in successful communities.

Since inception of the most recent initiatives in February 2014, AHA has seen the effectiveness of this human development services approach, with nearly 700 families becoming compliant or progressing. AHA will continue to advance the strategy in FY 2017.

IMPLEMENTATION YEAR

This activity was approved in the FY 2005 MTW Annual Plan. Implementation began in FY 2005.

CHANGES TO METRICS, BASELINE, OR BENCHMARK

There have been no changes to the metrics, baseline, or benchmark assumptions and calculations for FY 2017. Any changes in quantities, magnitude or value of FY 2017 benchmarks are due to normal year-to-year fluctuations in residents, households, or units that form the basis of inputs into the calculations.

SS #5: Households Assisted by Services that Increase Self Sufficiency		
Unit of Measurement	Baseline	FY2017 Benchmark
Number of households receiving services aimed to increase self-sufficiency (increase).	Households receiving self-sufficiency services prior to implementation of the activity (number). AHA = 0 (FY 2005)	Expected number of households receiving self-sufficiency services after implementation of the activity (number) = 1,200 households

SS #8: Households Transitioned to Self Sufficiency		
Unit of Measurement	Baseline	FY2017 Benchmark
Number of households transitioned to self-sufficiency (increase).	Households transitioned to self-sufficiency (AHA defines as households moving from non-compliant with work requirement to Compliant and Progressing) prior to implementation of the activity (number). This number may be zero. AHA = 0 (FY 2005)	Expected households transitioned to self-sufficiency (AHA defines as households moving from non-compliant with work requirement to Compliant and Progressing) after implementation of the activity (number) = 300 households

SS #3: Increase in Positive Outcomes in Employment Status		
Unit of Measurement	Baseline	FY2017 Benchmark
Report the following information separately for each category: (1) Employed Full- Time (2) Employed Part- Time (3) Enrolled in an Educational Program (4) Enrolled in Job Training Program (5) Unemployed (6) Other	Head(s) of households in << all categories >> prior to implementation of the activity (number). This number may be zero. AHA = 0 (FY 2005)	Expected head(s) of households in <<all categories>> after implementation of the activity (number) = 1,200 households

HC.2008.02 – LEASING INCENTIVE FEE (LIF)

DESCRIPTION

Originally used as a deconcentration strategy to provide financial incentives to encourage landlords and property owners to lease available housing to families impacted by relocation from AHA projects to be demolished. AHA continues to utilize this incentive to incent applicants and participants in the program move process to find units faster and submit their requests for tenancy approval as well as to remove barriers to leasing, such as security deposits and application fees. The LIF also attracts more landlords in areas of opportunity.

IMPACT

This tool was a critical element of the Quality of Life Initiative in which AHA facilitated relocation for nearly 3,000 families in public housing. In FY 2016, AHA began offering Leasing Incentive Fees to landlords on behalf of applicants that turn in a Request for Tenancy Approval (RTA) within 30 days of voucher issuance.

IMPLEMENTATION YEAR

This activity was approved in the FY 2005 MTW Annual Plan. Implementation began in FY 2007.

CHANGES TO METRICS, BASELINE, OR BENCHMARK

There have been no changes to the metrics, baseline, or benchmark assumptions and calculations for FY 2017. Any changes in quantities, magnitude or value of FY 2017 benchmarks are due to normal year-to-year fluctuations in residents, households, or units that form the basis of inputs into the calculations.

HC #5: Increase in Resident Mobility		
Unit of Measurement	Baseline	FY2017 Benchmark
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. AHA = 0 (FY 2005)	Expected households able to move to a better unit and/or neighborhood of opportunity after implementation of the activity (number) = 200 households
HC #1: Additional Units of Housing Made Available		
Unit of Measurement	Baseline	FY2017 Benchmark
Number of new housing units made available for households at or below 80% AMI as a result of the activity (increase).	Housing units of this type prior to implementation of the activity (number). This number may be zero. AHA = 0 (FY 2005)	Expected housing units of this type after implementation of the activity (number) = 200 units
HC #7: Households Assisted by Services that Increase Housing Choice		
Unit of Measurement	Baseline	FY2017 Benchmark
Number of households receiving services aimed to increase housing choice (increase).	Households receiving this type of service prior to implementation of the activity (number). This number may be zero. AHA = 0 (FY 2005)	Expected number of households receiving these services after implementation of the activity (number) = 200 households

AW.2011.01 – NON-ELDERLY DISABLED INCOME DISREGARD

DESCRIPTION

AHA amended its Income Disregard policy to include when determining annual household income, AHA will disregard the employment income of an Elderly Person or Disabled Person whose source(s) of income are Social Security, SSI, and/or other similar fixed income received from a verified plan ("Annual Fixed Income"). For those cases in which the Annual Fixed Income is not the primary source of income, Atlanta Housing Authority, in its discretion, may establish a limit on the amount of employment income that may be disregarded. Any employment income that is not disregarded will be included in annual household income for purposes of calculating Total Tenant Payment.

This policy will be applicable to all AHA housing assistance programs and serve as the replacement for applicable HUD rules and regulations.

IMPACT

Since implementation of this policy, the number of households with working non-elderly disabled persons has not significantly changed, and we do not anticipate any significant fluctuations in future years. Most importantly, individuals who choose to work may improve their quality of life and an increased level of self-sufficiency. This policy complements AHA's Aging Well strategy by encouraging disabled individuals to maintain their engagement in their communities.

IMPLEMENTATION YEAR

This activity was approved in the FY 2011 MTW Annual Plan. Implementation began in FY 2011.

CHANGES TO METRICS, BASELINE, OR BENCHMARK

There have been no changes to the metrics, baseline, or benchmark assumptions and calculations for FY 2017. Any changes in quantities, magnitude or value of FY 2017 benchmarks are due to normal year-to-year fluctuations in residents, households, or units that form the basis of inputs into the calculations.

SS #8: Households Transitioned to Self Sufficiency		
Unit of Measurement	Baseline	FY2017 Benchmark
Number of households transitioned to self-sufficiency (increase).	Households transitioned to self-sufficiency (defined as non-elderly disabled persons who have earned income) prior to implementation of the activity (number). This number may be zero. AHA = 82 households (FY 2011)	Expected households transitioned to self-sufficiency (AHA defines as non-elderly disabled persons who have earned income) after implementation of the activity (number) = 78 households

RE.2007.04 – PROJECT BASED RENTAL ASSISTANCE AS A STRATEGIC TOOL

DESCRIPTION

AHA designed its Project Based Rental Assistance (PBRA) program in which, through a competitive process, AHA solicits private developers and owners interested in reserving a percentage of their multi-family rental units for at least ten years. Commitments for PBRA may be extended beyond the ten-year period after meeting agreed upon conditions. As AHA receives and approves proposals from developers for multi-family rental properties outside of AHA's jurisdiction, AHA may negotiate intergovernmental agreements with PHAs or local governments in the Atlanta metropolitan area. AHA will continue to use its PBRA program to expand the availability of quality affordable housing in healthy, mixed-income communities for families and the elderly, to further develop supportive services housing, and as a tool for its Reformulation initiative and RAD conversions.

IMPACT

AHA's PBRA program has successfully increased the long-term availability of 4,992 market-rate quality new and existing affordable units to low-income families in Atlanta.

IMPLEMENTATION YEAR

This activity was approved in the FY 2007 MTW Annual Plan. Implementation began in FY 2007.

CHANGES TO METRICS, BASELINE, OR BENCHMARK

There have been no changes to the metrics, baseline, or benchmark assumptions and calculations for FY 2017. Any changes in quantities, magnitude or value of FY 2017 benchmarks are due to normal year-to-year fluctuations in residents, households, or units that form the basis of inputs into the calculations.

HC #1: Additional Units of Housing Made Available		
Unit of Measurement	Baseline	FY2017 Benchmark
Number of new housing units made available for households at or below 80% AMI as a result of the activity (increase).	Housing units of this type prior to implementation of the activity (number). This number may be zero. AHA = 0 (FY 2007)	Expected housing units of this type after implementation of the activity (number) = 217 units

HC #2: Units of Housing Preserved		
Unit of Measurement	Baseline	FY2017 Benchmark
Number of housing units preserved for households at or below 80% AMI that would otherwise not be available (increase). If units reach a specific type of household, give that type in this box.	Housing units preserved prior to implementation of the activity (number). AHA = 0 (FY 2007)	Expected housing units preserved after implementation of the activity (number) = 149 units

RE.2006.02 – PROJECT BASED RENTAL ASSISTANCE SITE BASED ADMINISTRATION

DESCRIPTION

AHA developed and implemented a Project Based Rental Assistance Agreement, which replaces the former Project Based HAP contract, for the effective implementation of the PBRA Site-Based Administration. Under site-based administration, the owner entities of such developments and their professional management agents have full responsibility, subject to AHA inspections and reviews, for the administrative and programmatic functions carried out in connection with admissions and occupancy procedures and processes relating to PBRA assisted units.

IMPACT

This process has made the PBRA program attractive to private sector real estate professionals by allowing them to manage and mitigate their market risk associated with owning and implementing the program. AHA provides oversight and accrues administrative cost savings over direct management.

IMPLEMENTATION YEAR

This activity was approved in the FY 2006 MTW Annual Plan. Implementation began in FY 2006.

CHANGES TO METRICS, BASELINE, OR BENCHMARK

There have been no changes to the metrics, baseline, or benchmark assumptions and calculations for FY 2017. Any changes in quantities, magnitude or value of FY 2017 benchmarks are due to normal year-to-year fluctuations in residents, households, or units that form the basis of inputs into the calculations.

CE #1: Agency Cost Savings		
Unit of Measurement	Baseline	FY2017 Benchmark
Total cost of task in dollars (decrease).	Cost of task prior to implementation of the activity (in dollars). AHA = Estimated savings realized in Baseline Year: 923 PBRA Units x HUD CY2008 PUM HC Blended Admin Fee Rate (\$53.26) x 12 months x 80% (assuming AHA still incurs 20% of the admin costs) = \$471,926 Baseline Agency Cost Savings for PBRA Units administered at the site. (FY 2008)	Expected cost of task after implementation of the activity (in dollars) = Estimated savings for Benchmark Year: 5,340 PBRA Units x HUD CY2016 PUM HC Column A Admin Fee Rate (\$72.29) x 12 months x 80% = \$3.7 million Baseline Agency Cost Savings.
CE #2: Staff Time Savings		
Unit of Measurement	Baseline	FY2017 Benchmark
Total time to complete the task in staff hours (decrease).	Total amount of staff time dedicated to the task prior to implementation of the activity (in hours). AHA = Divide the agency cost savings by AHA hourly rate to estimate staff time savings. \$471,926 ÷ \$35 = 13,484 hours saved (FY 2008)	Expected amount of total staff time dedicated to the task after implementation of the activity (in hours) = \$3.7 million ÷ \$35 = 106,000 hours saved

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

DESCRIPTION

AHA will continue to re-engineer, enhance, and streamline its business processes and related policies, procedures, and business documents such as Family Obligations, using its MTW flexibility to (1) increase cost efficiency of administering the program; (2) increase housing opportunities for families; and (3) advance self-sufficiency of Housing Choice Participants. Housing Choice Voucher Program core business processes that are being reviewed include: 1- Waitlist, 2- Portability, 3- Eligibility & Voucher Issuance, 4- Referrals, 5- Landlord Eligibility & RTA, 6- Unit Eligibility, 7- HAP & UAP Payments, 8- HAP Contract & Contract Maintenance, 9- Recertification, 10- Move Request, 11- Inquiry Management, 12- Compliance.

In the interests of families and as stewards of federal funds, AHA has strived to build long-term relationships with landlords that want to provide quality affordable housing. Despite opening and pulling from its waiting list in 2015 and 2016, AHA has seen voucher holders struggle to find available, appropriately sized units in Atlanta that meet AHA's Enhanced Inspections Standards. In turn, AHA has faced tough negotiations with landlords seeking rents that keep pace with a rising market.

In response to a tight real estate market, AHA has explored several approaches to increase availability of inventory and market the Housing Choice program. These approaches are designed to balance the differences between multi-family properties and single family properties, and the differences between new landlords and tenured, experienced landlords with a reliable track record. AHA has also continued to re-examine operating policies and modify them where appropriate to align with private sector business practices and expectations of property owners and to eliminate administrative burdens that hamper lease-up times.

For example, working with its Landlord Advisory Group during FY 2016, AHA re-examined its abatement policy and implemented an approach that incentivizes responsible landlords that promptly address unit repairs and maintenance, while appropriately penalizing and withholding Housing Assistance Payments to landlords with units that fail inspections and destabilize families.

Below are examples of activities AHA has implemented or plans to implement to ensure successful lease-up of Housing Choice applicants and participants.

- **Marketing Plan** – AHA has increased its outreach and marketing to large multi-family property owners and current property owners that own other non-participating properties. The marketing campaign will focus on raising awareness of the benefits of working with AHA, debunking the myths about assisted families, and educating the prospective property owners on how the program works. AHA will continue to collaborate with the City of Atlanta, Invest Atlanta, Atlanta Apartment Association, and the Atlanta Real Estate Collaborative to engage more property owners throughout the city.
- **Unit Incentive Fees** (Inspection First-Time Pass Bonus for Single Family Units) – Using savings from abatements, AHA will make one-time incentive payments to landlords each time their units pass on the initial inspection on the first attempt and they subsequently lease their units to Housing Choice applicants and participants under new contracts. AHA is launching a four-month pilot during FY 2016.
- **Leasing Incentive Fees** – AHA began offering Leasing Incentive Fees to landlords on behalf of applicants that turn in a Request for Tenancy Approval (RTA) within 30 days of voucher issuance. Leasing Incentive Fees are non-reimbursable and defray the costs of application fees and security deposits. AHA will also offer New Contract Incentives for Single Family Homes.

- **Streamlined AHA Enhanced Inspections Standards** – AHA reviewed and streamlined its Enhanced Inspections Standards to better align with private rental market practices and reduce administrative burden, where feasible. For example, AHA eliminated the requirement for landlords to provide gas certifications at the initial inspection. Gas certifications are only required at the inspector's discretion, such as when a gas appliance is not accessible. AHA also revised its Site & Vicinity standard to make the determination clearer for landlords.
- **Expedited Lease-up at High-Performing Multifamily Properties** – AHA will continue to implement its program allowing high-performing multifamily properties scoring 97 or greater on AHA's comprehensive property assessments, to conduct self-certification inspections signed by the participant and the landlord, and expedited processing of the housing assistance contracts and lease addendums. AHA conducts quality control inspections on a percentage of these units on an annual basis. The implementation of this program has reduced the lease-up cycle time for these properties from an average 25 days to 5 – 7 days.
- **Self-Certification Inspections at Multi-family Properties** – In FY 2016, AHA began allowing multi-family properties scoring 87 or greater on its comprehensive property assessments to conduct self-certification inspections signed by the participant and the landlord. AHA will conduct follow-up inspections on these units within 45 – 60 days following lease-up.
- **Rent Determination** – AHA will continue to implement enhancements to its rent determination process, offering fixed-rate boosts on units for major system upgrades, and allowing landlords to submit rent comparables including leases for comparable units and certain multiple listing service rents
- **Applicant/Participant Education** – AHA will implement an educational program that better equips applicants and participants with information that helps them identify and secure quality housing, especially in high opportunity areas.
- **Updated Sub-Market Payment Standards** – AHA currently uses its own payment standards for seven submarkets. These payment standards were introduced in 2007. In FY 2016, AHA contracted with a nationally recognized consultant to conduct a rental market study. The consultant identified the need for new payment standards and more sub-markets to more closely reflect market dynamics. AHA expects to roll-out new payment standards in FY 2017.

During FY 2017, AHA will continue to streamline its internal business processes and systems with the goal of ensuring successful lease-ups, stabilizing families, and expanding partnerships with landlords.

IMPACT

By creating its own Housing Choice Program standards, business practices and procedures based on private real estate market principles, AHA has improved cost efficiencies and reduced the administrative burden, enhanced its image within the community and amongst landlords, and, ultimately, created a program that enables and empowers families to move toward self-sufficiency.

IMPLEMENTATION YEAR

This activity was approved in the FY 2007 MTW Annual Plan. Implementation began in FY 2008.

CHANGES TO METRICS, BASELINE, OR BENCHMARK

There have been no changes to the metrics, baseline, or benchmark assumptions and calculations for FY 2017. Any changes in quantities, magnitude or value of FY 2017 benchmarks are due to normal year-to-year fluctuations in residents, households, or units that form the basis of inputs into the calculations.

CE #1: Agency Cost Savings		
Unit of Measurement	Baseline	FY2017 Benchmark
Total cost of task in dollars (decrease).	Cost of task prior to implementation of the activity (in dollars). AHA = Overhead Cost of \$12 million which was voucher administration cost of \$1,309 per voucher (FY 2008)	Expected cost of task after implementation of the activity (in dollars) = Overhead Cost of \$7.9 million which was voucher administration cost of \$807/voucher

RE.2005.09 – REFORMULATING THE SUBSIDY ARRANGEMENT IN AHA-SPONSORED MIXED-INCOME, MIXED-FINANCE COMMUNITIES INCLUDING CENTENNIAL PLACE AND AHA'S AFFORDABLE COMMUNITIES

DESCRIPTION

AHA continues to explore strategies to reformulate the subsidy arrangement for AHA-Sponsored mixed-income, mixed-finance communities and AHA-Owned Communities from public housing operating subsidy (under the existing Annual Contributions Contract) to AHA's Project Based Rental Assistance (under a PBRA Agreement), in order to sustain and preserve investments in these multi-family rental communities. AHA has worked with HUD to develop the program structure and process for implementation based on the Centennial Place demonstration model.

On November 2, 2012, HUD approved AHA's proposal to pilot AHA's Reformulation Demonstration Program under the auspices of its MTW Agreement at Centennial Place. In conjunction with the reformulation of Centennial Place, AHA received additional Housing Choice voucher funding on April 23, 2013, which will be used as part of the PBRA funding to replace the public housing operating subsidy upon conversion.

During FY 2017, AHA will continue with its implementation of the reformulation program at Centennial Place while exploring reformulation/conversion strategies that will improve long-term financial sustainability and preserve public and private investments in its other 15 mixed-income rental communities and AHA-Owned Residential Communities, as anticipated in and pursuant to AHA's MTW Agreement.

IMPACT

The ultimate objective of the Reformulation Demonstration Program at Centennial Place is to reposition the 301 AHA-assisted units so that these units will carry their aliquot share of the debt service, equity requirements, and operating costs for the property for the long-term sustainability of the development.

During FY 2015, under the Reformulation Demonstration Program, all 301 units were converted. In FY 2016, AHA's developer partner received Low Income Housing Tax Credits for Phase II. Phase IV will be the subject of a tax credit application in a future fiscal year.

IMPLEMENTATION YEAR

This activity was approved in the FY 2005 MTW Annual Plan. Implementation began in FY 2005.

CHANGES TO METRICS, BASELINE, OR BENCHMARK

There have been no changes to the metrics, baseline, or benchmark assumptions and calculations for FY 2017. Any changes in quantities, magnitude or value of FY 2017 benchmarks are due to normal year-to-year fluctuations in residents, households, or units that form the basis of inputs into the calculations.

<i>HC #2: Units of Housing Preserved</i>		
Unit of Measurement	Baseline	FY2017 Benchmark
Number of housing units preserved for households at or below 80% AMI that would otherwise not be available (increase). If units reach a specific type of household, give that type in this box.	Housing units preserved prior to implementation of the activity (number). AHA = 0 (FY 2005)	Expected housing units preserved after implementation of the activity (number) = 0 units

HC.2007.02 – RENT REASONABLENESS

DESCRIPTION

AHA developed and initiated rent reasonableness determinations in which an independent market analysis is conducted to establish the market equivalent rent for each residential unit in AHA's Housing Choice Voucher Program. This will result in improved and consistent rent determination outcomes which will stabilize Housing Choice contract rents in line with the rental market and available subsidy resources.

IMPACT

Using internal real estate expertise and knowledge of rents in the Atlanta market as well as professional services, AHA's rent determinations reflect the changing market rent dynamics and realities of the residential real estate market. More accurate and timely determination of rents has allowed AHA to realize HAP savings.

Based on market studies conducted in FY 2016, AHA will introduce updated sub-market payment standards which have been expanded from 7 to 23 sub-markets. These new payment standards also reflect the dramatic changes in the Atlanta real estate market since 2007. While all rents are subject to rent reasonableness determinations, AHA expects the cumulative effects of the payment standards may increase certain HAP costs.

IMPLEMENTATION YEAR

This activity was approved in the FY 2007 MTW Annual Plan. Implementation began in FY 2011.

CHANGES TO METRICS, BASELINE, OR BENCHMARK

There have been no changes to the metrics, baseline, or benchmark assumptions and calculations for FY 2017. Any changes in quantities, magnitude or value of FY 2017 benchmarks are due to normal year-to-year fluctuations in residents, households, or units that form the basis of inputs into the calculations.

CE #5: Increase in Agency Rental Revenue		
Unit of Measurement	Baseline	FY2017 Benchmark
Rental revenue in dollars (increase).	Rental revenue prior to implementation of the activity (in dollars). AHA = Average HAP per voucher = \$916. HAP assistance = \$81 million (FY 2011)	Expected rental revenue after implementation of the activity (in dollars) = Average HAP/voucher = \$862. Projected HAP assistance = \$71 million

AW.2008.01 - RENT SIMPLIFICATION / AHA STANDARD DEDUCTIONS

DESCRIPTION

During FY 2008 AHA adopted a policy, which was clarified in FY 2011 that states that the President and Chief Executive Officer shall approve the schedule of standard income deductions and any changes to the treatment of assets used to calculate an assisted household's portion of the contract rent. This policy was adopted and is implemented across all AHA housing and rental assistance programs.

Prior to implementation of the Rent Simplification Policy, AHA determined that across all programs, 80 to 85 percent of assisted families were not claiming "other deductions" relating to unreimbursed medical, attendant care and auxiliary apparatus, and child care expenses.

The goal of the Rent Simplification Policy is to streamline operations by eliminating the burden and potentially inaccurate process of verifying unreimbursed out-of-pocket expenses. The Standard Income Deductions improve and add value to the integrity and accuracy of rent and subsidy determinations and over time will result in improved operating efficiency and effectiveness across all programs. In addition, by increasing the amount of the HUD standard deduction for dependents from \$480 to AHA's standard deduction of \$750, and the HUD standard deduction for elderly/disabled families from \$400 to AHA's standard deduction of \$1,000, AHA's Standard Income Deductions under the Rent Simplification Policy provide an equitable deduction approach applicable to all assisted families.

IMPACT

This policy positively affects all families with dependent children or medical expenses. For the agency, less time is required collecting and processing receipts. There are also fewer errors because of streamlined processing.

IMPLEMENTATION YEAR

This activity was approved in the FY 2008 MTW Annual Plan. Implementation began in FY 2010.

CHANGES TO METRICS, BASELINE, OR BENCHMARK

There have been no changes to the metrics, baseline, or benchmark assumptions and calculations for FY 2017. Any changes in quantities, magnitude or value of FY 2017 benchmarks are due to normal year-to-year fluctuations in residents, households, or units that form the basis of inputs into the calculations.

CE #2: Staff Time Savings		
Unit of Measurement	Baseline	FY2017 Benchmark
Total time to complete the task in staff hours (decrease).	<p>Total amount of staff time dedicated to the task prior to implementation of the activity (in hours).</p> <p>AHA = 15% of households historically seek deductions x 17,338 households x 1 hour verification = 2,600 hours (FY 2010)</p>	<p>Expected amount of total staff time dedicated to the task after implementation of the activity (in hours) =</p> <p>15% of households historically seek deductions x 19,257 households x 1 hour verification = 2,888 hours saved.</p>

CE #3: Decrease in Error Rate of Task Execution		
Unit of Measurement	Baseline	FY2017 Benchmark
Average error rate in completing a task as a percentage (decrease).	Average error rate of task prior to implementation of the activity (percentage). AHA = 3% (FY 2012)	Expected average error rate of task after implementation of the activity (percentage) = 3% error rate

RE.2005.10 – REVITALIZATION PROGRAM

DESCRIPTION

Over the last 19 years, AHA and its private sector development partners have repositioned its public housing properties into 16 mixed-use, mixed-income communities with a seamless affordable housing component. The community-building model including human development strategies for mixed-use, mixed-income communities is a blend of private sector market principles and public sector safeguards, which AHA has branded the “Atlanta Model.”

In partnership with private sector developers, AHA will continue transforming conventional public housing developments into economically sustainable, market rate quality, mixed-use, mixed-income communities through its Strategic Revitalization Program. To further advance the program, AHA will continue acquiring improved or unimproved real estate parcels to support the creation of mixed-use, mixed-income communities, support local revitalization initiatives and stabilize local neighborhoods. Each of the Master Plans for the communities undergoing revitalization incorporates a vision for (1) re-integrating the revitalized communities with the surrounding neighborhoods; (2) incorporating great recreational facilities and green space; (3) retail and commercial activities; and (4) high-performing neighborhood schools.

Elements of the approved master plans will be advanced during FY 2017 subject to market demand, financial feasibility, funding availability, and conditions in the financial and real estate markets. The revitalization activities planned for implementation during FY 2017 are described in Section 1A, Table 1 of this Plan.

Subject to funding availability and in furtherance of the master plans and long-term community sustainability, AHA will continue to engage in acquisition activity during FY 2017. In addition to property acquisitions, AHA may be engaged in negotiations of land transactions with a number of entities to further support its revitalization efforts at the communities listed in Section 1A, Table 1 and in Sections 1B and 1C.

AHA will explore alternative funding options for the ongoing revitalization activities including, as appropriate, any sites of former public housing (as listed in Appendix D, Table 6 of this Plan). These options may include, but are not limited to, a variety of public and private sources such as MTW funds, Replacement Housing Factor funds, and Choice Neighborhoods Planning and/or Implementation grants.

During FY 2016 AHA has worked with a real estate consultant to analyze the site conditions, market conditions, and financial feasibility to determine short- and long-term opportunities for redevelopment of the former public housing sites that were demolished between FY 2007 and FY 2010, referred to as the Quality of Life Initiative (QLI). During FY 2017, AHA may continue revitalization activities associated with the QLI sites listed in Section 1C, Table 2.

IMPACT

Public/private partnerships are the key ingredient. AHA leverages its special standing under its charter, its goodwill, its land, its MTW Agreement, and HUD grants, while the private Development Partner leverages its balance sheet, know-how, brand, and track record to raise private equity and incur debt. In all cases, the partners align their interests so that both parties are focused on the success of the community. AHA’s revitalization efforts with private development partners have created 5,075 mixed-income rental units (including AHA-assisted units and tax-credit-only units) and 315 affordable single family homes have been sold to low-income families.

IMPLEMENTATION YEAR

This activity was approved in the FY 2005 MTW Annual Plan. Implementation began in FY 2005.

CHANGES TO METRICS, BASELINE, OR BENCHMARK

When the metrics, baseline and benchmarks were established initially as part of AHA's *Revised FY 2015 MTW Annual Plan*, HUD metric HC#2 was identified for this MTW Activity. Upon subsequent review, HUD Standard Metric HC#2 is not applicable to this development activity.

HC #1: Additional Units of Housing Made Available		
Unit of Measurement	Baseline	FY2017 Benchmark
Number of new housing units made available for households at or below 80% AMI as a result of the activity (increase).	Housing units of this type prior to implementation of the activity (number). This number may be zero. AHA = 2,720 units (FY 2005)	Expected housing units preserved after implementation of the activity (number) = 0 units (rental)

RE.2012.01 – SINGLE FAMILY HOME RENTAL DEMONSTRATION

DESCRIPTION

AHA will sell land to a Mechanicsville development partner for a neighborhood stabilization demonstration program for families at or below 60% AMI.

AHA's development partner has been engaged in pre-development activities for the development of 75 scattered-site rental units as part of a lease-to-own program promoting neighborhood stabilization. Affordable rentals will be achieved through low-income housing tax credit (LIHTC) Program for a 15-year period. Twenty-five of these units will be on AHA property under the terms of a ground lease with a purchase option at the end of the 15-year compliance period. AHA is not providing subsidy to families. For families that remain in the home throughout the 15-year LIHTC compliance period and increase their income sufficiently to become a qualified buyer, the opportunity to purchase the home will be provided.

IMPACT

The developer has received Low Income Housing Tax Credits and a closing is anticipated in 2016.

IMPLEMENTATION YEAR

This activity was approved in the FY 2012 MTW Annual Plan. Implementation began in FY 2013.

CHANGES TO METRICS, BASELINE, OR BENCHMARK

There have been no changes to the metrics, baseline, or benchmark assumptions and calculations for FY 2017. Any changes in quantities, magnitude or value of FY 2017 benchmarks are due to normal year-to-year fluctuations in residents, households, or units that form the basis of inputs into the calculations.

HC #1: Additional Units of Housing Made Available		
Unit of Measurement	Baseline	FY2017 Benchmark
Number of new housing units made available for households at or below 80% AMI as a result of the activity (increase).	Housing units of this type prior to implementation of the activity (number). This number may be zero. AHA = 0	Expected housing units of this type after implementation of the activity (number) = 10 units

SH.2013.01 – VETERANS SUPPORTIVE HOUSING

DESCRIPTION

Under AHA's PBRA for Supportive Housing program, owners and developers of supportive housing receive housing subsidy under PBRA agreement with AHA for up to two years. In return, the owner is required to 1) work with a certified Service Coordinator such as the United Way and 2) enter into an agreement with one or more service providers who will provide appropriate intensive support services for the target population. They also agree to coordinate with any public agencies and nonprofit organizations that are providing additional case support to individual residents.

AHA provides supportive housing for veterans using its PBRA program and tenant-based vouchers such as the HUD Veterans Affairs Supportive Housing (HUD-VASH) voucher program. The HUD-VASH vouchers program is not an MTW activity, but is operated under AHA's Supportive Housing policies and administered through AHA's Housing Choice Program.

IMPACT

Oasis at Scholars Landing opened in FY 2015 and provides 60 affordable assisted rental units for seniors with a veterans preference. *VASH vouchers are not reported as an MTW Activity.*

IMPLEMENTATION YEAR

This activity was approved in the FY 2013 MTW Annual Plan. Implementation began in FY 2013.

CHANGES TO METRICS, BASELINE, OR BENCHMARK

There have been no changes to the metrics, baseline, or benchmark assumptions and calculations for FY 2017. Any changes in quantities, magnitude or value of FY 2017 benchmarks are due to normal year-to-year fluctuations in residents, households, or units that form the basis of inputs into the calculations.

HC #1: Additional Units of Housing Made Available		
Unit of Measurement	Baseline	FY2017 Benchmark
Number of new housing units made available for households at or below 80% AMI as a result of the activity (increase).	Housing units of this type prior to implementation of the activity (number). This number may be zero. AHA = 0 (FY 2013)	Expected housing units of the type after implementation of the activity (number) = 0 units

HC #7: Households Assisted by Services that Increase Housing Choice		
Unit of Measurement	Baseline	FY2017 Benchmark
Number of households receiving services aimed to increase housing choice (increase).	Households receiving this type of service prior to implementation of the activity (number). This number may be zero. AHA = 0 (FY 2013)	Expected number of households receiving these services after implementation of the activity (number) = 0 households

AW.2005.03 – WORK/PROGRAM REQUIREMENT

DESCRIPTION

Effective October 1, 2004, AHA's work/program participation policy requires that (a) one non-disabled adult household member (between the age of 18 – 61 years) maintain continuous full-time employment (at least 30 hours per week) and (b) all other non-elderly, non-disabled adults maintain work or participation in a combination of school, job training and/or part-time employment as a condition of the household receiving and maintaining subsidy assistance.

Because the primary paths to self-sufficiency are work and education, in FY 2014, AHA began implementing its Human Development Services strategy to assist families in the Housing Choice Voucher Program with achieving compliance with the work/program requirement within 12 months in order to maintain their housing assistance.

Non-compliant households are subdivided into two categories: progressing and non-compliant.

- Progressing households are households in which all Target Adults are engaged in a minimum of 15 hours per week of work, training, and/or school. These households are encouraged to continue improvements and are not referred for human development services as long as they maintain this status.
- Non-compliant households are households in which Target Adults are not working or meeting any of the work/program requirements.

In FY 2014, AHA began utilizing an expanded Human Development Services staff (including two Family Self-Sufficiency Program funded coordinators) to assess the specific needs of the whole family in support of Target Adults transitioning to the workforce. Recognizing that chronic unemployment may be related to long-term, complex barriers, AHA refers the families most in need to contracted service providers that specialize in particular issues. AHA staff provide service coordination, monitor the family's progress, and provide guidance for up to 12 months.

For families whose reasons for unemployment may be related to other issues, such as job skills development or access to quality affordable child care, AHA has expanded its Service Provider Network to include 126 community organizations that address a broad spectrum of support services, including services that address the needs of senior and disabled household members. AHA staff also conduct resource briefings and workshops on topics such as résumé writing and how to enter the Georgia's state child care lottery.

IMPACT

The dignity and empowerment of work cannot be underestimated. When first instituted, less than 14 percent of households were working. During the current economic recession, families have had difficulty obtaining and maintaining employment. As the general unemployment rate has risen, AHA-assisted households have experienced a drop in income, either from job lay-offs or reduction in available work hours. However, the work/program requirement remains a powerful tool in enabling families to move to self-sufficiency.

A strong indication of the impact of mixed-income environments is that 96 percent of AHA-assisted households with Target Adults in AHA-Sponsored Mixed-Income Communities, and 95 percent of households in PBRA Communities were in compliance with AHA's work/program requirement. By contrast, in FY 2013, only 37 percent of Housing Choice households were in compliance.

Since inception of the most recent initiatives in February 2014, AHA has seen the effectiveness of this human development services approach, with nearly 700 families becoming compliant or progressing. AHA will continue to advance the strategy in FY 2017.

IMPLEMENTATION YEAR

This activity was approved in the FY 2005 MTW Annual Plan. Implementation began in FY 2005.

CHANGES TO METRICS, BASELINE, OR BENCHMARK

There have been no changes to the metrics, baseline, or benchmark assumptions and calculations for FY 2017. Any changes in quantities, magnitude or value of FY 2017 benchmarks are due to normal year-to-year fluctuations in residents, households, or units that form the basis of inputs into the calculations.

SS #3: Increase in Positive Outcomes in Employment Status		
Unit of Measurement	Baseline	FY2017 Benchmark
Report the following information separately for each category: (1) Employed Full- Time (2) Employed Part- Time (3) Enrolled in an Educational Program (4) Enrolled in Job Training Program (5) Unemployed (6) Other	Head(s) of households in << all categories >> prior to implementation of the activity (number). This number may be zero. AHA = 0 (FY 2005)	Expected head(s) of households in << all categories >> after implementation of the activity (number) = 1,200 households

SS #8: Households Transitioned to Self Sufficiency		
Unit of Measurement	Baseline	FY2017 Benchmark
Number of households transitioned to self - sufficiency (increase).	Households transitioned to self - sufficiency (AHA defines as households moving from non-compliant with work requirement to Compliant and Progressing) prior to implementation of the activity (number). This number may be zero. AHA = 0 (FY 2005)	Expected households transitioned to self-sufficiency (AHA defines as households moving from non-compliant with work requirement to Compliant and Progressing) after implementation of the activity (number) = 300 households

SS #5: Households Assisted by Services that Increase Self Sufficiency		
Unit of Measurement	Baseline	FY2017 Benchmark
Number of households receiving services aimed to increase self - sufficiency (increase).	Households receiving self - sufficiency services prior to implementation of the activity (number). AHA = 0 (FY 2005)	Expected number of households receiving self-sufficiency services after implementation of the activity (number) = 1,200 households

B. NOT YET IMPLEMENTED MTW ACTIVITIES

The MTW activity number indicates the functional area, fiscal year in which the activity was approved in AHA's MTW Plan. **Key:** AW – Agency-wide; HC – Housing Choice; HD – Human Development; PH – Public Housing; RE – Real Estate; SH – Supportive Housing.

Not Yet Implemented Activities		
Activity #	Activity	MTW Authorization(s)
PH.2003.01	Affordable Fixed Rent / Affordable Flat Rent	Attachment D, Section I.O: General Conditions
HC.2012.02	Comprehensive Graduation Program	Attachment D, Section VII: Establishment of Housing Choice Voucher Program
HD.2013.02	Endowment Fund for Human Development Services	Attachment D, Section I.O: General Conditions Attachment D, Section V: Single Fund Budget with Full Flexibility
HC.2006.03	Housing Choice Inspection Fees	Attachment D, Section VII: Establishment of Housing Choice Voucher Program
HD.2005.14	Individual Development Accounts (IDAs)	Attachment D, Section VII: Establishment of Housing Choice Voucher Program
HD.2006.04	Standards for Residency in Single Family Homes	Attachment D, Section VII: Establishment of Housing Choice Voucher Program

PH.2003.01 – AFFORDABLE FIXED RENT / AFFORDABLE FLAT RENT

DESCRIPTION

AHA will explore different rent structures for Public Housing to further align with private sector practices as well as maximize the use of the subsidy resource.

UPDATE

Because this initiative was developed to address rent structures in AHA's large family public housing communities, it is obsolete and does not align with AHA's current strategy.

TIMELINE FOR IMPLEMENTATION

With recent changes in HUD flat rent requirements, AHA will continue to explore rent structures consistent with self-sufficiency goals, including the proposed MTW Activity: Elimination of Flat Rent (FY 2017).

HC.2012.02 – COMPREHENSIVE GRADUATION PROGRAM

DESCRIPTION

AHA will develop and implement a comprehensive graduation program for assisted families who have achieved economic self-sufficiency and financial stability and who no longer need rental assistance. AHA will use the standard income levels for determining eligibility as the benchmark for success and will develop and implement strategies to ensure the smooth transition of successful families who have graduated. Such strategies may include financial counseling and homeownership opportunities.

UPDATE

AHA expects to consider implementation of this program as part of its Human Development Services strategy.

TIMELINE FOR IMPLEMENTATION

A timeline has not been established for this activity.

HD.2013.02 – ENDOWMENT FUND FOR HUMAN DEVELOPMENT SERVICES

DESCRIPTION

To further enhance its human development strategy, AHA will establish an endowment fund for long-term sustainability of investments in human development services and other non-HUD funded initiatives.

UPDATE

After initial exploratory research, AHA determined that more research is needed to assess fully the feasibility of this initiative.

TIMELINE FOR IMPLEMENTATION

A timeline has not been established for this activity.

HC.2006.03 – HOUSING CHOICE INSPECTION FEES

DESCRIPTION

AHA contemplated charging landlords reasonable fees for pre-inspections and subsequent re-inspections following the initial re-inspection to cover the administrative costs associated with these additional inspections. AHA also contemplated charging participant households a fee to cover the administrative costs of re-inspections due to certain deficiencies which were the responsibility of the household and remained unaddressed.

UPDATE

AHA postponed the implementation of this project during the implementation of certain activities in Re-Engineering the Housing Choice Voucher Program.

TIMELINE FOR IMPLEMENTATION

A timeline has not been established for this activity.

HD.2005.14 – INDIVIDUAL DEVELOPMENT ACCOUNTS (IDAS)

DESCRIPTION

Having eliminated the Federal Earned Income Disallowance for residents paying an income-adjusted rent, at its discretion, AHA explored the implementation of an IDA initiative which would promote and encourage economic independence among residents through a monetary incentive program.

UPDATE

Due to the implementation of AHA's Quality of Life Initiative, AHA discontinued exploring this program and during FY 2009 postponed any further development.

TIMELINE FOR IMPLEMENTATION

AHA may explore use of similar self-sufficiency programs in the future.

HD.2006.04 – STANDARDS FOR RESIDENCY IN SINGLE FAMILY HOMES

DESCRIPTION

AHA contemplated adopting and implementing single family home eligibility standards (1-4 units) to assure that families are prepared financially and otherwise to live in single family homes and be successful in neighborhoods.

UPDATE

Due to other priority Housing Choice Re-engineering efforts, this activity was postponed in FY 2008. AHA informally incorporates rental housing counseling in its case management.

TIMELINE FOR IMPLEMENTATION

A timeline has not been established for this activity.

C. ACTIVITIES ON HOLD

The MTW activity number indicates the functional area, fiscal year in which the activity was approved in AHA's MTW Plan. **Key:** AW – Agency-wide; HC – Housing Choice; HD – Human Development; PH – Public Housing; RE – Real Estate; SH – Supportive Housing.

Activities On Hold		
Activity #	Activity	MTW Authorization(s)
HC.2006.05	Port Administration Re-engineering	Attachment D, Section VII: Establishment of Housing Choice Voucher Program

HD.2006.05 – PORT ADMINISTRATION RE-ENGINEERING

DESCRIPTION

AHA will continue to build its collaborative relationships with metro Atlanta public housing authorities to explore strategies for creating seamless mobility administration arrangements and agreed upon procedures and business terms that would be implemented through intergovernmental agreements. AHA is also exploring strategies for contractually passing on its MTW flexibility to partnering PHAs through these intergovernmental agreements.

UPDATE

After some early enthusiasm in discussions with metro Atlanta PHAs, interest in formal agreements waned. AHA will build on these relationships to continue to explore streamlining ports administration, eventually resulting in formal agreements when warranted.

D. CLOSED OUT ACTIVITIES

The MTW activity number indicates the functional area, fiscal year in which the activity was approved in AHA's MTW Plan. **Key:** AW – Agency-wide; HC – Housing Choice; HD – Human Development; PH – Public Housing; RE – Real Estate; SH – Supportive Housing

Closed Out Activities		
Activity #	Activity	MTW Authorization(s)
--	ARRA Funds	n/a
HD.2007.05	Housing Choice Family Self-Sufficiency (FSS) Program Re-engineering	Attachment D, Section VII: Establishment of Housing Choice Voucher Program
SH.2008.04	John O. Chiles Annex Supportive Housing Pilot	Attachment D, Section V: Single Fund Budget with Full Flexibility Attachment D, Section VII. B: Simplification of the Process to Project Based Section 8 Vouchers Attachment D, Section VII. C: Simplification of the Development and Redevelopment Process
HD.2008.05	Pre-Relocation Client Education	Attachment D, Section VII: Establishment of Housing Choice Voucher Program
RE.2007.06	Quality of Life (QLI) Initiative	Attachment D, Section I.O: General Conditions Attachment D, Section VII. C: Simplification of the Development and Redevelopment Process
PH.2007.07	Utility Allowance Waiver	Attachment D, Section V: Single Fund Budget with Full Flexibility
--	Voluntary Compliance Agreement (VCA)	n/a
AW.2010.01	Business Transformation Initiative	Attachment D, Section V: Single Fund Budget with Full Flexibility Attachment D, Section VII: Establishment of Housing Choice Voucher Program

AW.2010.01 – BUSINESS TRANSFORMATION INITIATIVE

Reason for Closing Out Initiative

The Business Transformation initiative was a three-phase strategy to (I) assess and evaluate AHA's current business systems and practices, (II) develop and recommend an efficient and effective business model patterned after the best practices of successful private-sector real estate companies and the state-of-the-art information systems that support such companies and (III) develop and launch a business transformation implementation plan. As part of the plan, AHA completed implementation of an enterprise resource planning solution designed to provide business process automation across every department.

Final Outcome and Lessons Learned

The ERP solution supports greater productivity of AHA's staff. AHA has automated business processes internally; eliminated manual, redundant processes and paperwork; and introduced broader controls and data security. By improving the quality, accuracy, and frequency of interaction between AHA, families, real estate development partners, property management companies, and owners, AHA has improved relationships, resulting in better outcomes for families.

Appendix H3: Proposed MTW Activities: HUD Approval Requested

BACKGROUND

The Atlanta Housing Authority's (AHA) Ongoing Activities addresses the HUD Form 50900 requirement by listing activities identified in AHA's MTW Annual Implementation Plans ("MTW Annual Plans") since FY 2005. Per AHA's MTW Agreement with HUD on September 23, 2003, the initial period of which was effective from July 1, 2003 through June 30, 2010, and the executed Amended and Restated MTW Agreement, effective as of November 13, 2008, and further amended by that certain Second Amendment to the Moving to Work Agreement, effective as of January 16, 2009, once HUD approves AHA's MTW Annual Plan, the approval is deemed to be cumulative and remains in effect for the duration of the Amended and Restated MTW Agreement period, as it may be extended from time to time.

In June 2014, AHA decided to report its MTW-approved activities in accordance with the HUD Form 50900 – Attachment B and solely for purposes of complying with the substantive information reporting requirements of the Paperwork Reduction Act.

DESCRIPTION

This section includes information for **Section III: Proposed MTW Activities** of the HUD Form 50900. These are proposed activities for which AHA is seeking HUD's approval.

For each activity AHA has provided a narrative, MTW authorizations, and HUD Standard Metrics. Per HUD's requirements "**standard metrics must be shown in the table format provided in the 'HUD Standard Metrics' Section of Form 50900.**"

EXAMPLE of HUD Standard Metrics:

HC #5: Increase in Resident Mobility		
Unit of Measurement	Baseline	FY2017 Benchmark
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. AHA = 0	Benchmark set in FY 2017 MTW Annual Plan.

*AHA-reported
figures or
definitions in
BOLD type*

*FY 2017
benchmarks as
determined by
AHA.*

The MTW activity number indicates the functional area and fiscal year in which the activity was approved in AHA's MTW Plan. **Key:** AW – Agency-wide; HC – Housing Choice; HD – Human Development; PH – Public Housing; RE – Real Estate; SH – Supportive Housing.

PH.2017.01 – ELIMINATION OF FLAT RENT

An MTW activity – PH.2003.01 – Affordable Fixed Rent / Affordable Flat Rent – was approved in the FY 2003 MTW Annual Plan. This proposed activity builds on the intent with this previously approved MTW activity.

DESCRIPTION

With recent changes in HUD flat rent requirements, AHA may explore rent structures consistent with self-sufficiency goals, private sector practices and the goal to increase housing opportunities for low-income families (statutory objective #3).

In anticipation of future conversions of subsidy from Section 9 to Section 8 and to provide greater alignment between affordable housing programs, AHA proposes to eliminate flat rents from its public housing communities. Flat renters would be transitioned to the standard income-adjusted rents in which a household pays 30 percent of their income towards rent and utilities.

There are compelling reasons to implement this policy. Few households – 1.3 percent – utilize this option. Because households that utilize flat rents tend to be higher income households, income-adjusted rents are more consistent with HUD's emphasis on creating greater housing opportunities for those most in need. As conversions from Section 9 to Section 8 funding using AHA's PBRA program are completed, eventually all households will pay income-adjusted rents. Additionally, HUD guidance introduced in 2014 has created a greater administrative burden on AHA and its Property Management/Developers to adjust and track the flat rents each year for very few households.

In accordance with its MTW Agreement, AHA will conduct an impact analysis as part of its annual report. Based on a preliminary assessment of current incomes of flat renters combined with the new HUD-mandated flat rent annual adjustments, AHA anticipates limited impacts to the preponderance of affected households.

STATUTORY OBJECTIVES & MTW AUTHORIZATIONS

Because households that utilize flat rents tend to be higher income households, income-adjusted rents are more consistent with HUD's emphasis on creating greater housing opportunities for those most in need. This approach addresses statutory objective #3: increase housing choices.

MTW Authorizations:

- Attachment D, Section I.O: General Conditions
- Attachment D, Section V: Single Fund Budget with Full Flexibility
- Attachment D, Section IV: Self-Sufficiency/Supportive Services

IMPACT

In 2015, AHA amended its flat rent policies to comply with the statutory changes contained within Public Law 113 – 76, the Fiscal Year 2014 Appropriations Act. HUD required that all flat rents be set at no less than 80 percent of the applicable Fair Market Rent (FMR) adjusted, if necessary, to account for reasonable utilities costs. At the time 77 households were paying flat rents. AHA followed a phase-in schedule in adjusting its flat rents. Currently, 26 residents (or 1.3% of public housing residents in AHA-Owned Residential Communities) have chosen the flat rent option and would be affected by this change.

SCHEDULE FOR IMPLEMENTATION

AHA anticipates implementing the policy July 1, 2016, in which all new admissions would only be provided income-based rent calculations. For current flat renters, AHA will communicate with the families and phase-in the changes during FY 2017 and thereafter in order to prevent hardship to affected families.

STANDARD HUD METRICS

HC #1: Additional Units of Housing Made Available*		
Unit of Measurement	Baseline	FY2017 Benchmark
Number of new housing units made available for households at or below 80% AMI as a result of the activity (increase).	Housing units of this type prior to implementation of the activity (number). This number may be zero. AHA = 26 (FY 2016)	Expected housing units of this type after implementation of the activity (number) = 20 new units

*HUD Standard Metric used assumes that some families will opt-out and make new units available for other low-income families.

SH.2017.01 – NEXT STEP YOUTH SELF-SUFFICIENCY PROGRAM

DESCRIPTION

AHA will continue developing and implementing alternative and supportive housing resources for income-eligible families. Resources include Elderly Designated Housing, Special Needs Designated Housing for Persons with Disabilities, Affordable Assisted Living or other supportive housing initiatives.

Working with the Georgia Department of Family and Children Services (“DFCS”) and its contracted Independent Living Program service providers, AHA is proposing a new MTW activity referred to as “Next Step” to provide vouchers to house foster care youth ages 18-23 that age out of foster care (“transitioning youth”) and that are working with the State-supported Independent Living Program (ILP). The purpose of the voucher is to help the aged out foster youth stabilize their living situation, avoid becoming homeless and move toward self-sufficiency. Initially, AHA will offer vouchers to house up to 25 eligible transitioning youth that are properly vetted and referred by DFCS.

Typically when a foster youth reaches 18 years of age, they exit the system and often lack the independent living skills and guidance to “make it” on their own. Often transitioning youth become homeless. AHA seeks to supply vouchers to house transitioning youth for up to 36 months or until age 23, whichever comes first. AHA reserves the authority to extend vouchers up to 12 months to allow full-time students to complete their degree or other circumstances on a case-by-case basis and in consultation with DFCS.

AHA will also require voucher-holders under this activity to begin, continue, and/or maintain appointments and visits with social service providers as recommended by DFCS (or its contracted ILP service providers) to assist these families in the preparation of living independently and creating a stable living environment. AHA may not issue any vouchers and may consider DFCS recommendations on whether to renew voucher contracts to families (transitioning youth) that refuse or withdraw from appropriate service-level case management (or equivalent ILP requirements), including the refusal to meet AHA’s work/program requirements.

Vouchers issued under this activity are not portable, are subject to minimum rent, and standard AHA rent calculations. Under AHA’s Supportive Housing policies (*Statement of Corporate Policies*) alternative occupancy arrangements (e.g., shared housing and sponsored housing) may be considered.

Overall, this activity requires a strong working partnership between AHA and the state DFCS office and Independent Living Program, where AHA will administer the vouchers and DFCS will refer the transitioning youth to AHA. An overview of the process resembles the following:

- Collaboration between AHA, DFCS, and service providers to create measurable goals and standards for success and to jointly create forms and processes, which may be achieved through regular meetings and trainings;
- Referral process between AHA and DFCS, where both agencies will establish points-of-contact to expedite the housing/referral process, through pre-screenings and other measures administered by DFCS prior to referrals (other agencies may refer to DFCS for referral to AHA). AHA will finalize eligibility of referrals and issue vouchers as appropriate.

IMPACT

Using its MTW flexibility to partner with the private sector, government agencies, and the service provider community, AHA has created multiple solutions to address the various local housing needs of at-risk populations.

STATUTORY OBJECTIVES & MTW AUTHORIZATIONS

Because transitioning youth experience high rates of homelessness and housing instability, this activity addresses statutory objective #3: increase housing choices for low-income families. Because this is a term-limited program, this activity also addresses statutory objective #2: incent self-sufficiency.

MTW Authorizations:

- Attachment D, Section V: Single Fund Budget with Full Flexibility
- Attachment D, Section IV: Self-Sufficiency/Supportive Services
- Attachment D, Section VII: Establishment of Housing Choice Voucher Program
- Attachment D, Section VII. B: Simplification of the Process to Project Based Section 8 Vouchers
- Attachment D, Section VII. C: Simplification of the Development and Redevelopment Process

SCHEDULE FOR IMPLEMENTATION

AHA anticipates implementing the program July 1, 2016 after completing an Intergovernmental Agreement with DFCS and outlining procedures, communications and tracking methods.

STANDARD HUD METRICS (applied to this program)

HC #1: Additional Units of Housing Made Available		
Unit of Measurement	Baseline	Benchmark
Number of new housing units made available for households at or below 80% AMI as a result of the activity (increase).	Housing units of this type prior to implementation of the activity (number). This number may be zero. AHA = 0 (FY 2017)	Expected housing units of this type after implementation of the activity (number) = 25 new units

HC #7: Households Assisted by Services that Increase Housing Choice		
Unit of Measurement	Baseline	Benchmark
Number of households receiving services aimed to increase housing choice (increase).	Households receiving this type of service prior to implementation of the activity (number). This number may be zero. AHA = 0 (FY 2017)	Expected number of households receiving these services after implementation of the activity (number) = 25 households

SS #5: Households Assisted by Services that Increase Self Sufficiency		
Unit of Measurement	Baseline	Benchmark
Number of households receiving services aimed to increase self-sufficiency (increase).	Households receiving self-sufficiency services prior to implementation of the activity (number). AHA = 0 (FY 2017)	Expected number of households receiving self-sufficiency services after implementation of the activity (number) = 25 households

SS #8: Households Transitioned to Self Sufficiency		
Unit of Measurement	Baseline	Benchmark
Number of households transitioned to self-sufficiency (increase).	Households transitioned to self-sufficiency (AHA defines as households moving from non-compliant with work requirement to Compliant and Progressing) prior to implementation of the activity (number). This number may be zero. AHA = 0 (FY 2017)	Expected households transitioned to self-sufficiency (AHA defines as households moving from non-compliant with work requirement to Compliant and Progressing) after implementation of the activity (number) = 20 households

SS #3: Increase in Positive Outcomes in Employment Status		
Unit of Measurement	Baseline	Benchmark
Report the following information separately for each category: (1) Employed Full- Time (2) Employed Part- Time (3) Enrolled in an Educational Program (4) Enrolled in Job Training Program (5) Unemployed (6) Other	Head(s) of households in << all categories >> prior to implementation of the activity (number). This number may be zero. AHA = 0 (FY 2017)	Expected head(s) of households in <<all categories>> after implementation of the activity (number) = 25 households

**Atlanta Housing Authority
Responses to HUD's Comments on FY 2017 MTW Annual Plan
July 20, 2016**

General Comments

- (1) **HUD COMMENT - Page 4:** AHA should update the discussion of its MTW Agreement to denote the Agreement's extension through FY 2028.

AHA RESPONSE: AHA affirmatively acknowledged HUD's extension offer on May 9, 2016. Because the FY 2017 MTW Annual Plan ("Plan") was submitted on April 12, 2016 and the public review process occurred during February and March, this section was not updated to reflect the extension. AHA has revised the Plan with the following language:

In December 2015, Congress mandated the extension of the MTW Demonstration Program to June 30, 2028 under the same terms and conditions of AHA's current agreement. HUD confirmed this extension to AHA in writing on April 14, 2016. (FY 2017 MTW Annual Plan, page 4)

- (2) **HUD COMMENT - Page 15:** AHA notes it "reserves the right to engage" in a list of real estate activities in FY17. HUD reminds AHA that other approvals outside of the MTW Agreement and MTW Plan may be required.

AHA RESPONSE: AHA has received HUD approval for the activities described in the Plan. As needed, AHA will continue to seek approvals for any activities that require MTW authorization beyond its currently and cumulatively approved MTW activities, as well as non-MTW approvals or actions necessary to execute real estate transactions (e.g., disposition of land).

- (3) **HUD COMMENT - Page 18:** On page 18, AHA discusses its plans to expand its PBRA program in FY17. As HUD and AHA have previously discussed, the use of this name for the AHA's locally-designed PBV program is confusing given it is the same as an existing HUD program. HUD encourages AHA to consider creating a new name for its PBV program.

AHA RESPONSE: AHA recognizes the confusion its PBRA program, approved under MTW in 2006, may cause with HUD's programs that were implemented subsequent to AHA's program. As part of a broader marketing and branding project we have recently commenced, AHA will develop an alternative name for its PBRA program with a target completion within the next 90 days.

Appendix H2: Ongoing Activities

- (4) **HUD COMMENT - General Comment:** In this appendix AHA provides information related to ongoing MTW activities in the format required by HUD Form 50900. As discussed by HUD and AHA during an April 2016 MTW Site Visit at AHA, some of these activity descriptions require additional detail in order for HUD and the public to fully understand how AHA's MTW flexibility is being used, and also to allow HUD to accurately assign Standard Metrics. Because the assignment of Standard Metrics relies on the description of flexibility being used, HUD is only providing comments about areas where expanded descriptions are needed at this time. Subsequent to the approval of this Plan, HUD will work with AHA on appropriate standard metrics during, so that they can be incorporated into AHA's FY18 Plan.

AHA RESPONSE: Please note that in response to HUD's feedback during the April 2016 site visit, AHA revised the descriptions of previously approved MTW Activities to reflect the longer descriptions provided by AHA in the year the activity was approved. Additionally, during discussions between AHA and HUD in 2014, both parties recognized the imperfect nature and administrative burden of adapting AHA's approved performance benchmarks and reporting format to recreate the Form 50900 after the fact. We look forward to working with you on a balanced approach to refinements during the next year.

- (5) **HUD COMMENT - Page 5 - \$125 Minimum Rent:** AHA should add information about its hardship policy to the activity description.

AHA RESPONSE: The *Amended and Restated Statement of Corporate Policies* ("Statement of Corporate Policies") is the controlling policy document governing the programs administered by AHA. The Statement of Corporate Policies captures the Moving to Work Demonstration policy innovations in effect. All administrative processes, procedures and protocols are developed pursuant to the Statement of Corporate Policies. As a practice, AHA includes revisions to its Statement of Corporate Policies in each annual Plan, which is presented for public review.

Hardship policies, as well as review processes, are in accordance with the Statement of Corporate Policies and procedures (operating policies) for AHA assistance programs. Under general rent policies in the Statement of Corporate Policies, the following statement is made:

An AHA-Assisted Household may be eligible for Hardship Consideration when any one of the following circumstances is present: (i) the AHA-Assisted Household has lost eligibility or is waiting an eligibility determination for a Federal, State or local assistance program; (ii) the income of the AHA-Assisted Household has decreased because of extraordinary changed circumstances, including layoff from a job; or (iii) such other extraordinary circumstances as Atlanta Housing Authority or the Owner of the Covered Unit may determine. (Statement of Corporate Policies, Chapter 1, Article 11)

Additional procedural guidance and related details are provided in the Statement of Corporate Policies, which is provided in full in Appendix G of the Plan.

- (6) **HUD COMMENT - Page 7 – Affordable Assisted Living Demonstration:** AHA should expand the description of this activity to explain what types of statutory and regulatory flexibility have been used to effectuate such projects.

AHA RESPONSE: The statutory and regulatory flexibilities necessary to implement the Affordable Assisted Living activity as approved in 2005 are the following:

- Attachment D, Section V: Single Fund Budget with Full Flexibility
- Attachment D, Section VII. B: Simplification of the Process to Project Based Section 8 Vouchers
- Attachment D, Section VII. C: Simplification of the Development and Redevelopment Process

Additionally, statutory and regulatory flexibilities necessary to implement all previously approved MTW Activities are listed on pages 2-4 of Appendix H2.

- (7) **HUD COMMENT - Page 8 – Aging Well Program:** AHA should expand the description of this activity to explain what types of statutory and regulatory flexibility have been used to effectuate such projects. For example, does AHA require residents to participate in services as a condition of occupancy?

AHA RESPONSE: The statutory and regulatory flexibilities necessary to implement AHA's expanded Aging Well activity as approved in 2011 are the following:

- Attachment D, Section IV: Self-Sufficiency/Supportive Services
- Attachment D, Section V: Single Fund Budget with Full Flexibility

Additionally, statutory and regulatory flexibilities necessary to implement all previously approved MTW Activities are listed on pages 2-4 of Appendix H2.

As described on page 8 of Appendix H2, "all AHA-Owned high-rise residents now have the ability to access services and resources needed to be engaged and in control of decisions that affect their lives and the aging process." In other words, AHA does not require resident participation in this program. Rather, AHA utilizes MTW Single Fund flexibility to make available to residents services and programming that promote active aging.

- (8) **HUD COMMENT - Page 10 – AHA Submarket Payment Standards:** AHA should provide a description of the methodology and data sources used to create its submarket payment standards as part of the description. Information on how these payment standards compare to the FMR would be helpful context. Lastly, when AHA makes changes to the payment standards, is AHA following the regulatory process for implementing a payment standard change or is an alternative implementation timeframe being used via AHA's MTW flexibility?

AHA RESPONSE: AHA's Submarket Payment Standards activity was approved in FY 2006 by HUD. Any changes to payment standards are reviewed and approved by AHA's Board of Commissioners prior to implementation. This process, including the timing of its implementation, is consistent with similar HUD regulations and conforms with AHA's authorizations under its MTW Agreement.

AHA is authorized under its MTW Agreement to create and implement its own Housing Choice Voucher Program (HCVP). The MTW Agreement further provides that as a component of the HCVP, AHA is authorized to determine and make adjustments to the HCVP payment standards.¹

AHA's policy statement for establishing and implementing the AHA Submarket Payment Standards is set forth in the Statement of Corporate Policies.

Atlanta Housing Authority will establish, implement and publish maximum rental subsidy amounts for Voucher-assisted rental units by location and bedroom size ("AHA Submarket Payment Standards"). The AHA Submarket Payment Standards will be used in lieu of the Fair Market Rents [FMRs] published annually by HUD in the Federal Register. AHA will utilize recognized market study practices and other valuation methods for establishing the AHA Submarket Payment Standards.

In general, agencies administering the housing choice voucher program must establish their payment standards between 90% and 110% of the HUD fair market rents published for the FMR area in which they operate.² However, MTW agencies are not required to establish payment standards using this basic range.³ AHA determined that the FMRs published for the Atlanta-Sandy Springs-Marietta Metro FMR Area represented a broad geographical area and did not necessarily reflect actual market rents inside the City of Atlanta. Therefore, using its MTW flexibility, AHA established its own system of payment standards and submarkets as an MTW activity in its HUD-approved FY2006 MTW annual plan. AHA then identified submarkets within the city and created its own payment standard schedule for these submarkets. On August 29, 2007, AHA's Board adopted the first schedule of AHA Submarket Payment Standards for seven submarket areas (2007 Payment Standards).

In order to update the 2007 Payment Standards, AHA convened an internal team comprised of staff with market valuation, neighborhood and housing quality, methodology and policy expertise. AHA procured and engaged a third-party expert, Applied Real Estate Analysis, Inc. (AREA), to recommend logical submarkets and market rents within the City of Atlanta based on a thorough assessment of the residential rental market. After performing a study of rents, market conditions and neighborhood characteristics, AREA recommended the creation of 23 submarkets. In addition, AREA collected data on market rents in the City of Atlanta and provided market rent ranges by bedroom size for each of the submarkets.

Based on AREA's study, AHA's internal team utilized an analytical approach and iterative process, informed by quantitative data and qualitative information on market rents, neighborhoods and housing quality, to finalize the proposed submarket payment standards. To develop the proposed AHA Submarket Payment Standards, the team selected the adjusted version of AREA's Maximum Market Rents and compared them to both the 2007 Payment Standards and the HUD 2016 FMRs for the Atlanta-Sandy Springs-Marietta Metro FMR Area.

¹ Atlanta Housing Authority. 2008. *Amended and Restated Moving to Work Agreement*. Attachment D - Legacy and Community-Specific Authorizations - Section VII.A.

² The regulation at 24 *CFR* §982.503(b) sets forth the basic range for establishing payment standard amounts.

³ HUD acknowledges that, "*Moving to Work (MTW) agencies have the authority to waive 24 CFR 982.503 and can propose, for HUD approval, alternate rent policies in their Annual MTW Plan.*" See, HUD. June 16, 2016. "Establishing a More Effective Fair Market Rent System; Using Small Area Fair Market Rents in Housing Choice Voucher Program Instead of the Current 50th Percentile FMRs." *Federal Register* 81(116): 39220.

The team finalized the submarket payment standards for senior management review. As part of the vetting process, the submarket map and payment standards were shared with AHA's Housing Choice Landlord Advisory Group and received very favorable feedback and support. On March 30, 2016, AHA's Board of Commissioners approved a resolution authorizing AHA to implement a revised schedule of AHA Submarket Payment Standards for twenty-three (23) submarkets in the City of Atlanta, effective July 1, 2016.

- (9) **HUD COMMENT - Page 11 – Comprehensive Homeownership Program:** Please clarify how participants are selected for the downpayment assistance program. Also, how many families does AHA currently assist or plan to assist through each of these programs?

AHA RESPONSE: AHA's homeownership program increases affordable homeownership opportunities for low-income families through two approaches: the Housing Choice Voucher Homeownership Program and Down Payment Assistance. Currently, AHA is not identifying new participants or expanding the Housing Choice Voucher Homeownership Program, which currently has 30 participating families. The Down Payment Assistance program utilizes a rigorous underwriting process to determine the level of down payment assistance that can be provided to a qualified family without over-subsidizing. For FY 2017, AHA plans to assist at least 10 additional units/families (Appendix H2, page 11).

The impact of AHA's Homeownership Program is described in the Impact section (Appendix H2, page 11) and detailed figures and projections for Households Served are provided in Appendix D, page 1.

- (10) **HUD COMMENT - Page 17 – Enhanced Inspection Standards:** Based on the description of this activity, HUD cannot discern whether AHA has made changes to how and when inspection policies are applied or whether AHA has actually created different inspection protocols. Please expand the description of this activity to explain what inspection protocols are being used and how implementation differs from the traditional HCV program.

AHA RESPONSE: In accordance with AHA's MTW Agreement, AHA established enhanced inspections standards for its Housing Choice Voucher Program in 2005.⁴ AHA created more comprehensive inspections standards and processes than those applicable under HUD HQS in order to improve the delivery of quality, safe and affordable housing to assisted families. AHA routinely reviews and revises its Enhanced Inspection Standards. Recently, as a result of a tight real estate market, AHA reviewed and streamlined its Enhanced Inspections Standards to better align with private rental market practices and reduce administrative burdens to landlords, when feasible. For example, AHA eliminated the requirement for landlords to provide gas certifications at the initial inspection. Gas certifications are only required at the inspector's discretion, such as when a gas appliance is not accessible. AHA also revised its Site & Vicinity standard to make the determination clearer for landlords.

⁴ "AHA is authorized to develop property and system inspection protocols and standards in lieu of the current or future HUD standards for its public housing, Housing Choice (tenant vouchers and project-based rental assistance) and Homeownership Programs." Atlanta Housing Authority. 2008. *Amended and Restated Moving to Work Agreement*. Attachment D - Legacy and Community-Specific Authorizations - Section XI.B.

- (11) **HUD COMMENT - Page 18 – Gap Financing:** Please explain what level of Gap financing is provided to each project.

AHA RESPONSE: AHA utilizes its MTW Single Fund flexibility to provide various forms of financing for development, including gap financing. Expenditures related to real estate development are included in AHA's annual budget in Appendix F. As reflected in the budget, the gap financing for Juniper & Tenth Highrise is \$4 million, which equates to 21 percent of Total Development Costs (TDC). AHA anticipates a RAD closing for this project in October 2016. Because the rehab period for Juniper and Tenth Highrise is anticipated to be 12-14 months, AHA budgeted \$3 million in FY 2017 and the remainder in FY 2018's budget.

- (12) **HUD COMMENT - Page 20 – Housing Choice Voucher Program HAP Abatement Policy:** AHA should expand the activity description to explain the policies it has developed. AHA currently references its HCV Administrative Plan, but these policies should be explained in the activity description in the MTW Plan to that it is clear how MTW flexibility is used.

AHA RESPONSE: AHA is authorized under its MTW Agreement to create and implement its own Housing Choice Voucher Program (HCVP).⁵

As a result of discussions with current AHA landlords and property owners, AHA changed the previous HAP abatement procedure, which penalized landlords in the amount of one month of housing assistance payments for units that did not pass inspection before the deficiency due date. Under the new procedure, if the unit fails to pass inspection prior to the deficiency cure due date, (24 hours, 72 hours or 30 days, depending upon the severity of the deficiency), the owner will incur a daily, pro-rated abatement penalty until repairs are made and the unit passes inspection. This procedure was introduced in October 2015.

- (13) **HUD COMMENT - Page 21 – Human Development Services:** Please clarify whether participation in these services is a condition of program participation.

AHA RESPONSE: AHA's human development process is designed to counsel, coach and educate. Participation in human development services is not a condition of program participation as long as a Participant household remains in compliance with Family Obligations and AHA policies. If, for example, a household is not compliant with AHA's work requirement, then the non-compliant target adult (i.e. who is not working) may be offered the opportunity to participate in job counseling and other human development services offered by AHA and its partners. If the non-compliant adult fails to obtain employment on their own and is not participating under a case plan with AHA, the household may be proposed for termination due to non-compliance with AHA's work requirement.

- (14) **HUD COMMENT - Page 23 – Leasing Incentive Fee:** Please add information on how much AHA will pay for a LIF. How often can a participant access this resource? A number of other MTW PHAs are moving forward with similar activities and HUD would like to understand AHA's model better so that it can be shared with other interested MTW PHAs.

⁵ Atlanta Housing Authority. 2008. *Amended and Restated Moving to Work Agreement*. Attachment D - Legacy and Community-Specific Authorizations - Section VII.A.

AHA RESPONSE: AHA has utilized Leasing Incentive Fees (LIF) in the Housing Choice Voucher Program for participants to assist with costs for deposits and application fees, and for landlords in order to incentivize them to speed up the leasing process. Participants may request LIF to be paid to a landlord on their behalf once every five years.

In order to increase and sustain landlord participation, AHA has made available up to \$500 in LIFs to landlords that submit Requests for Tenancy Approval (RTA) for single family units. Landlords can receive \$250 for each new contract activated on a single family unit ("New Contract Incentive for Single Family Homes"). Landlords can also receive an additional \$250 if the same unit passes the initial inspection on the first attempt ("Inspection First-time Pass Bonus for Single-family Units"). Landlords can access this resource for any unit that qualifies.

- (15) **HUD COMMENT - Page 25 – Project Based Rental Assistance as a Strategic Tool:** Please expand the description to clearly state how AHA is using its MTW flexibility for its PBRA program. For example, AHA notes it's using a competitive process but is that an alternative competitive process, outside of what is allowed in the HUD PBV program? Does AHA exceed the project-basing caps? What other ways has AHA refined this program to make it work better locally?

AHA RESPONSE: AHA's MTW Agreement authorizes AHA to establish its own project-based voucher program, which we intend to re-name in this fiscal year. The MTW Agreement further authorizes AHA to exceed the project-basing caps:

The flexibility to exceed the limit on local rent subsidy that is project-based for AHA's entire program and the flexibility to exceed the limit on local rent subsidy that is project based in any project and the flexibility to determine criteria for expending funds of physical improvements on those units provided that each development serves a broad range of incomes;⁶

The PBRA Program policies are described in AHA's Statement of Corporate Policies. All PBRA Program administrative processes, procedures and protocols are developed pursuant to the Statement of Corporate Policies, including AHA's form of PBRA Agreement, competitive procurement processes, site-based administration and other innovations.

AHA recently issued a Request for Proposals (RFP) under AHA's MTW PBRA program seeking proposals from qualified owners and developers to provide housing in Areas of Opportunity. AHA defines an Area of Opportunity as a census tract with a poverty rate of less than or equal to 20 percent of the total population in the census tract and a minority rate of less than or equal to 50 percent of the total population in the census tract. The pending RFP covers areas that may be located within AHA's jurisdiction in the city of Atlanta. It will be amended in FY 2017 to add areas within AHA's ten-mile extra-jurisdictional boundary outside of the Atlanta city limits. For proposed developments located in an Area of Opportunity, AHA will approve reasonable rents, based on a third-party market study, up to the maximum submarket payment standards under AHA's Housing Choice tenant-based voucher program. Rents in Areas of Opportunity will not be limited by AHA's rent cap of 60 percent of Area Median Income Rent Levels.

To broaden its use of MTW flexibility and further implement its policies for special needs populations, AHA may solicit, through a competitive process, additional proposals from developers and owners of

⁶ Atlanta Housing Authority. 2008. *Amended and Restated Moving to Work Agreement*. Attachment D - Legacy and Community-Specific Authorizations - Section VII.A.

supportive housing targeted for homeless families, individuals, and youth; persons with mental health or developmental disabilities; veterans; and other at-risk populations.

- (16) **HUD COMMENT - Pages 27-28 – Re-Engineering the HCV Program:** AHA provides a number of examples of changes it has made to its HCV program. This information is helpful but not clear enough for HUD to fully understand how MTW flexibility is being utilized. It would be helpful if AHA could expand each of the major pieces of this activity so that HUD can understand how traditional HCV policies have been modified.

AHA RESPONSE: AHA is authorized under its MTW Agreement to create and implement its own Housing Choice Voucher Program (HCVP).⁷ AHA's Statement of Corporate Policies captures the Moving to Work Demonstration policy innovations in effect (Appendix G, Chapters 1 and 3). All administrative processes, procedures and protocols are developed pursuant to the Statement of Corporate Policies, including specific procedures (operating policies) related to the Housing Choice Voucher Program.

In addition to the policy innovations in effect, in response to a tight real estate market, AHA has explored several approaches to increase availability of inventory and market the HCVP. AHA has implemented or plans to implement the following actions to ensure successful lease-up of Housing Choice applicants and participants (described in detail in Appendix H2, pages 27-28):

- **Marketing Plan** – AHA has increased its outreach and marketing to large, multi-family property owners and current HCVP landlords that own other properties that are not yet enrolled in AHA's program.
- **Unit Incentive Fees** (Inspection First-Time Pass Bonus for Single Family Units) – Using savings from abatements, AHA will make one-time incentive payments to landlords each time their units pass on the initial inspection on the first attempt and they subsequently lease their units to Housing Choice applicants and participants under new contracts.
- **Leasing Incentive Fees** – AHA began offering Leasing Incentive Fees to landlords on behalf of applicants that turn in a Request for Tenancy Approval (RTA) within 30 days of voucher issuance.
- **Streamlined AHA Enhanced Inspections Standards** – AHA reviewed and streamlined its Enhanced Inspections Standards to better align with private rental market practices and reduce administrative burden, where feasible.
- **Expedited Lease-up at High-Performing Multifamily Properties** – AHA will continue to implement its program allowing high-performing multifamily properties scoring 97 or greater on AHA's comprehensive property assessments, to conduct self-certification inspections signed by the participant and the landlord, and expedited processing of the housing assistance contracts and lease addendums.
- **Self-Certification Inspections at Multi-family Properties** – In FY 2016, AHA began allowing multi-family properties scoring 87 or greater on its comprehensive property assessments to conduct self-certification inspections signed by the participant and the landlord.
- **Rent Determination** – AHA will continue to implement enhancements to its rent determination process, offering fixed-rate boosts on units for major system upgrades, and allowing landlords to

⁷ Atlanta Housing Authority. 2008. *Amended and Restated Moving to Work Agreement*. Attachment D - Legacy and Community-Specific Authorizations - Section VII.A.

submit rent comparables including leases for comparable units and certain multiple listing service rents.

- **Applicant/Participant Education** – AHA will implement an educational program that better equips applicants and participants with information that helps them identify and secure quality housing, especially in high opportunity areas.
- **Updated Sub-Market Payment Standards** – AHA previously used its own payment standards for seven submarkets. As of July 1, 2016, AHA uses new payment standards for 23 submarkets.

Regularly, AHA includes a section in its annual reports that highlights key MTW innovations such as its Housing Choice Voucher Program. The section from the FY 2015 MTW Annual Report is attached to this document.

- (17) **HUD COMMENT - Page 32 – Rent Reasonableness:** It would be helpful if AHA could provide a short description of the market analysis methodology used to make rent reasonableness determinations.

AHA RESPONSE: AHA establishes reasonable rents through a process of rent determination using market comparables on an individual-unit basis. These determinations are used to formulate counter-offers to the owner in the contract rent negotiation. After inspection, the unit is best-matched (location and bedroom/bathroom count) to actual rents reported by a commercial data source. A range of rents are considered by averaging comparable rents and by normalizing a market-equivalent rent scaled to the subject property's finished square footage. Moderate boosts are given for properties which are newer (built 2000 or later) or have had major upgrades to or replacement of major systems (HVAC, electrical, energy efficiency). AHA will also boost for landlord-paid utilities in multi-family properties that are master-metered. For efficiency, AHA may establish a standard rent schedule for multi-family properties with identical units.

- (18) **HUD COMMENT - Page 33 – Rent Simplification/AHA Standard Deductions:** AHA notes two standard deductions that have been implemented without required verification and at higher amounts than under the traditional HUD program. Have any other standard deductions been created and/or have any other changes been made to verification requirements? Also, have other rent simplification policies been implemented?

AHA RESPONSE: AHA implemented its Standard Deductions activity in FY 2010. Prior to implementation, AHA determined that across all programs, 80 to 85 percent of assisted families were not claiming "other deductions" relating to unreimbursed medical, attendant care and auxiliary apparatus, and child care expenses. AHA discontinued the practice of verifying receipts and calculating amounts for these other deductions and increased the standard deductions for families in its rental assistance programs. By increasing the amount of the HUD standard deduction for dependents from \$480 to AHA's standard deduction of \$750, and the HUD standard deduction for elderly/disabled families from \$400 to AHA's standard deduction of \$1,000, AHA's Standard Income Deductions under the Rent Simplification Policy provide an equitable deduction approach applicable to all assisted families. AHA has not created any other standard deductions or changes to required verification of deductions.

- (19) **HUD COMMENT - Page 38 – Veterans Supportive Housing:** Based on the description it appears that this activity allows participants to obtain subsidy for a period not to exceed 2 years, and those participants must also participate in services as a condition of assistance. At the end of the 2 years, is there a way for families to continue receiving assistance? What types of hardship policies are in place?

AHA RESPONSE: Under AHA's MTW PBRA program, a Supportive Housing PBRA Agreement is permitted for a term up to two years "unless AHA, in its discretion, approved a longer term in its PBRA Commitment to the Owner" (Statement of Corporate Policies, Chapter 4, Article 2). This two-year, renewable contract provision was established in order to ensure that the property owner maintains an active relationship with a service provider. Assuming the property owner maintains this relationship and can provide evidence of funding for such services, AHA would typically renew the PBRA Agreement for another two-year term upon the owner's request. As long as the assisted family remains eligible and in good standing under their lease, they can continue to reside in the unit. Because AHA's MTW PBRA Program operates differently from HUD's PBV program, assisted families do not have mobility rights and would lose assistance if they decided to move. Hardship policies, as well as review processes, are in accordance with the Statement of Corporate Policies and procedures (operating policies) for the MTW PBRA program as captured in AHA's form of Supportive Housing PBRA Agreement.

- (20) **HUD COMMENT - Page 39-40 – Work/Program Requirement:** Please include AHA's hardship policy for this activity.

AHA RESPONSE: Hardship policies, as well as review processes are in accordance with the Statement of Corporate Policies and procedures (operating policies) for AHA assistance programs. Under general rent policies in the Statement of Corporate Policies, the following statement is made:

An AHA-Assisted Household may be eligible for Hardship Consideration when any one of the following circumstances is present: (i) the AHA-Assisted Household has lost eligibility or is waiting an eligibility determination for a Federal, State or local assistance program; (ii) the income of the AHA-Assisted Household has decreased because of extraordinary changed circumstances, including layoff from a job; or (iii) such other extraordinary circumstances as Atlanta Housing Authority or the Owner of the Covered Unit may determine. (Statement of Corporate Policies, Chapter 1, Article 11)

Appendix H3: Proposed Activities

- (21) **HUD COMMENT - Page 2-3 – Elimination of Flat Rent:** Because this is a new rent reform activity, AHA should include an impact analysis that shows how the rents of the 26 affected residents will change with the elimination of flat rents. Also, please include AHA's hardship policy for this activity.

AHA RESPONSE: In accordance with AHA's MTW Agreement and its Statement of Corporate Policies, no impact analysis for this rent reform activity is required until AHA seeks approval from its Board of Commissioners prior to implementation of such activity. Accordingly, the impact analysis, as well as evidence of AHA's Board approval of the rent reform activity, will be included in AHA's FY 2016 MTW Annual Report.



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