



# MTW

MOVING TO WORK  
**ANNUAL PLAN**  
FY 2024

ASHLEY IC

PUBLIC COMMENT PERIOD FEBRUARY 5 – MARCH 7, 2023  
BOARD APPROVAL: MARCH 22, 2023  
HUD SUBMISSION: APRIL 14, 2023  
HUD RESUBMISSION: JULY 12, 2023  
HUD APPROVAL: TBD

# VISION, MISSION, & VALUES

## Vision

Our vision is a city where all Atlantans have a place they are proud to call home and can thrive, regardless of their income or address.

## Mission

The mission of Atlanta Housing is to open doors to safe, quality affordable homes, build inclusive communities of choice, and create opportunities for economic mobility.

## Values

We are a team of bold, compassionate, and committed change-makers dedicated to working collaboratively to serve the Atlanta community with our unique resources.

# AH Leadership

## *Moving-to-Work Since 2003*

### **Board of Commissioners**

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Sarah Kirsch, Vice Chair  
Rosalind Elliott  
Duriya Farooqui  
Shelia Harris  
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Ken Sadeckas, *Finance*  
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Lisa Washington, Esq., *Office of General Counsel*  
Michael D. Wilson, *Transactions Management & Capital Markets*

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# I. INTRODUCTION

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# A. Overview

## About Atlanta Housing

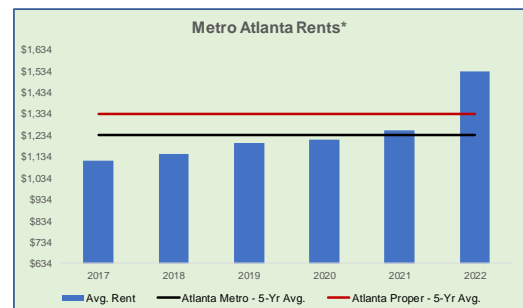
The Housing Authority of the City of Atlanta, Georgia, also referred to as Atlanta Housing or AH provides rental assistance to low-income families across the City of Atlanta. AH is considered the oldest public housing authority (PHA), with the construction of the first federally subsidized public housing community, Techwood Homes, in 1935. AH also built the first public housing community for African American residents, University Homes, near the Atlanta University Center. AH is the largest public housing authority in Georgia and serves more than 43,000<sup>1</sup> people. Its portfolio includes the following programs:

- **AH-Owned Communities:** 7 public housing sites: 5 for elderly and disabled households and 2 family sites.
- **Down-Payment Assistance:** A forgivable loan to help eligible first-time homebuyers.
- **HomeFlex:** AH's MTW unit-based assistance program, where the assistance remains with the unit.
  - **Standard HomeFlex:**
    - For multi-family units in AH-Owned, Mixed, or Stand-Alone privately owned communities.
    - For buildings or communities that house older persons [i.e., near elderly (55+) and elderly (62+) residents].
  - **HomeFlex Supportive Housing (HAVEN):**
    - For property owners that agree to provide wrap-around services and housing for vulnerable and targeted population groups.
- **Housing Choice Vouchers (HCVs):** HUD's tenant-based voucher (TBV) program administered by AH that includes AH's Special Programs (AH SPVs) and HUD's Special Purpose Vouchers (SPVs). AH SPVs are programs created by MTW flexibility.
- **Mixed Communities:** Communities built on land owned by AH and ground leased long-term to the owner/developer, or mixed-income developments in which AH has an ownership interest, investment, or subsidy agreement.
- **RAD PBV Communities:** Former public housing communities converted to project-based voucher (PBV) communities under HUD's Rental Assistance Demonstration (RAD) Program.

## The Need for Affordable Housing in Atlanta

Atlanta, the "capital of the south," remains one of the fastest growing metropolitan areas in the country. Several factors contribute to this growth: a comfortable climate, a business-friendly environment across many industries, and its 57 colleges and universities in the metropolitan area, which attract companies eager to tap into the talents of diverse and highly skilled employees.

However, Atlanta's rapid growth, combined with a variety of broader economic factors, has resulted in significantly higher housing costs. Rents in Atlanta grew 22% between January 2021 and through December 2022<sup>2</sup> and Freddie Mac continues to forecast Atlanta in the top rent growth areas in the country<sup>3</sup>. Similarly, home costs have increased significantly, rising 24.8% between July 2021 and December 2022<sup>4</sup>.



Source: apartmentlist.com/research; \*As of December 31, 2022

<sup>1</sup> As of December 31, 2022

<sup>2</sup> Source: *Apartment List* Metro-Level Historic Estimates, <https://www.apartmentlist.com/research/category/data-rent-estimates>, shows \$1,258 January 2021 and \$1,562 for December 2022 as average rent overall.

<sup>3</sup> Source: <https://www.multihousingnews.com/freddie-mac-forecasts-continued-multifamily-growth-in-2022/#:~:text=The%20metros%20that%20are%20expected,Ariz.%2C%20at%207.1%20percent.>

<sup>4</sup> Source: S&P CoreLogic Case-Shiller Home Price Index.

## Vision, Mission & Values

AH's Vision, Mission, and values are as follows:

### **Vision**

*Our vision is a city where all Atlantans have a place they are proud to call home and can thrive, regardless of their income or address.*

### **Mission**

*The mission of Atlanta Housing is to open doors to safe, quality affordable homes, build inclusive communities of choice, and create opportunities for economic mobility.*

### **Values**

*We are a team of bold, compassionate, and committed change-makers dedicated to working collaboratively to serve the Atlanta community with our unique resources.*

## AH's Strategic Plan (FY 2023 – 2027)

In January 2023, AH released a new five-year Strategic Plan, covering Fiscal Years 2023 through 2027 "Plan". AH's previous strategic plan, known as VISION 2022, concluded on June 30, 2022. The new Strategic Plan provides a blueprint for how to reach a key goal for the production and preservation of affordable housing, in alignment with the vision and goals set forth by Mayor Andre Dickens. The Plan has been informed by market realities, insights from AH's key partners, our current commitments and capacities, and anticipated challenges and opportunities.

The Plan recognizes that no single organization can solve Atlanta's housing affordability challenge alone, but working with others, AH can bring its different resources and various skillsets to bear to have a large impact. The result is a Plan that puts residents at the heart of everything AH does, while searching for better, smarter, and more efficient ways to operate.

In the course of this work, AH established the following Goals and Key Targets:

### **GOAL 1: Create or preserve 10,000 affordable housing units.**

#### Key Targets

- 1.A Produce 5,000 new affordable units
  - 1.A.1 Repurpose 300 acres of AH-Owned vacant land toward housing and create healthy, thriving neighborhoods
  - 1.A.2 To support the creation of 5,000 units, invest \$220 million over five years
- 1.B Preserve and improve 5,000 units in AH's existing portfolio
  - 1.B.1 To support the preservation of 5,000 units, invest \$30 million over five years
- 1.C Increase designation of sustainability-certified units in our portfolio to 33% to lower the overall cost of living of our residents

### **GOAL 2: Enhance housing assistance resources for Atlantans in need**

#### Key Targets

- 2.A Continue to provide stable housing for 1,900 families and individuals per year experiencing or at heightened risk of homelessness
- 2.B Provide emergency assistance to 1,800 families and individuals facing eviction over five years
- 2.C Increase the number of AH households living in amenity-rich and transit-connected neighborhoods to 3,500
- 2.D Provide 1,400 new families with homeownership opportunities to help build wealth and combat displacement



### **GOAL 3: Create opportunities for individuals, families, and children to thrive.**

#### Key Targets

- 3.A Advance efforts that address youth achievement by coordinating a cradle-to-career educational pipeline of programs and services for AH-assisted youth
- 3.B Through increased partnerships, support residents to prepare for, connect to, and succeed in jobs and careers
- 3.C Provide a continuum of care for AH-assisted seniors to enable them to stay healthy and live independently and with dignity in their homes

### **GOAL 4: Build or expand partnerships to pool resources and maximize impact for the benefit of families.**

#### Key Targets

- 4.A Secure a minimum of \$500,000 in new funding annually to support AH's mission
- 4.B Collaborate with public agencies and initiatives to leverage resources and align efforts
- 4.C Raise \$2 million to improve energy efficiency in AH units

### **GOAL 5: Communicate the impact of Atlanta Housing's work to Atlanta.**

#### Key Targets

- 5.A Increase visibility into our progress and key successes to foster confidence in AH's work
- 5.B Provide targeted communication and frequent updates to key stakeholders

### **GOAL 6: Strengthen Atlanta Housing operations.**

#### Key Targets

- 6.A Increase efficiency, improve access to programs and services, and foster staff engagements with AH families, and improve access to programs and services
- 6.B Create economic opportunity for AH residents and disadvantaged businesses by achieving 35% participation in eligible AH contracts for minority-, women-, and resident-owned small businesses
- 6.C In support of City of Atlanta's 2019 Clean Energy Resolution to achieve 100% clean energy by 2035, AH will reduce its carbon footprint by 25% in five years

## **Moving-to-Work (MTW)**

As an MTW PHA<sup>5</sup>, AH can combine program funds and deploy MTW flexibilities to modify and waive certain program rules and regulations<sup>6</sup> in pursuit of innovative solutions to local housing challenges. AH is required to meet MTW Statutory Requirements in the administration of its programs. The **MTW Statutory Requirements** are as follows:

- Ensure 75 percent of households are very low-income (VLI).
- Establish a reasonable rent policy that encourages employment and self-sufficiency.
- Continue to assist substantially the same (StS) total number of eligible low-income households.
- Continue to assist a comparable mix of households by family size; and
- Meet Housing Quality Standards (HQS) requirements.

AH continues to support the MTW Demonstration Program, the MTW Collaborative, and HUD's expansion efforts of the MTW Program. AH continues to remain interested in and supportive of a Regional MTW designation once the concept evolves.

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<sup>5</sup> There were 39 MTW PHAs prior to new legislation enacted in 2016 that adds 100 MTW cohorts. AH received its MTW designation in 2003.

<sup>6</sup> Found in the United States Housing Act of 1937 (Housing Act or the Act) applicable to the Housing Choice Voucher and Public Housing Rental Assistance Programs (Section 8 and Section 9).

AH's participation in the MTW Demonstration Program<sup>7</sup> has been critical in AH's ability to meet low-income individual's housing needs or to respond effectively to the twin challenges of rapid growth and increasing market rents and home costs. Whenever AH deploys its MTW Authorizations to waive certain program rules and regulations, it creates an MTW Activity. MTW Activities must **align with at least one of the three** following **MTW Statutory Objectives**:

- **Reduce cost** and achieve greater cost effectiveness in Federal expenditures.
- **Give incentives to families with children** where the head of household is working, is 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; or
- **Increase housing choices** for low-income families.

In addition to meeting the statutory objectives, AH asks three basic questions when proposing new initiatives and reviewing existing initiatives:

- Is the proposal or initiative **good for the residents**?
- Is the proposal or initiative **good for the community**?
- Is the proposal or initiative **good for the agency**?

AH requires an affirmative answer to all three questions before moving forward with a new initiative.

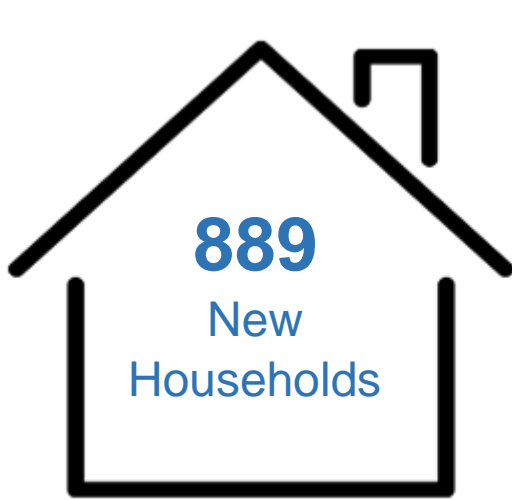
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<sup>7</sup> The MTW Demonstration Program was created by the United States Congress (US Congress or Congress) in 1996 and is administered by the United States Department of Housing and Urban Development (HUD). The US Congress renews the MTW Demonstration Program periodically and Congress last extended the Program through June 20, 2028. AH executed its MTW Agreement with HUD on September 23, 2003.

# Ia. INTRODUCTION: FY 2024 HIGHLIGHTS

## AH Projects **889** New Households

(Units occupied by new program participants)

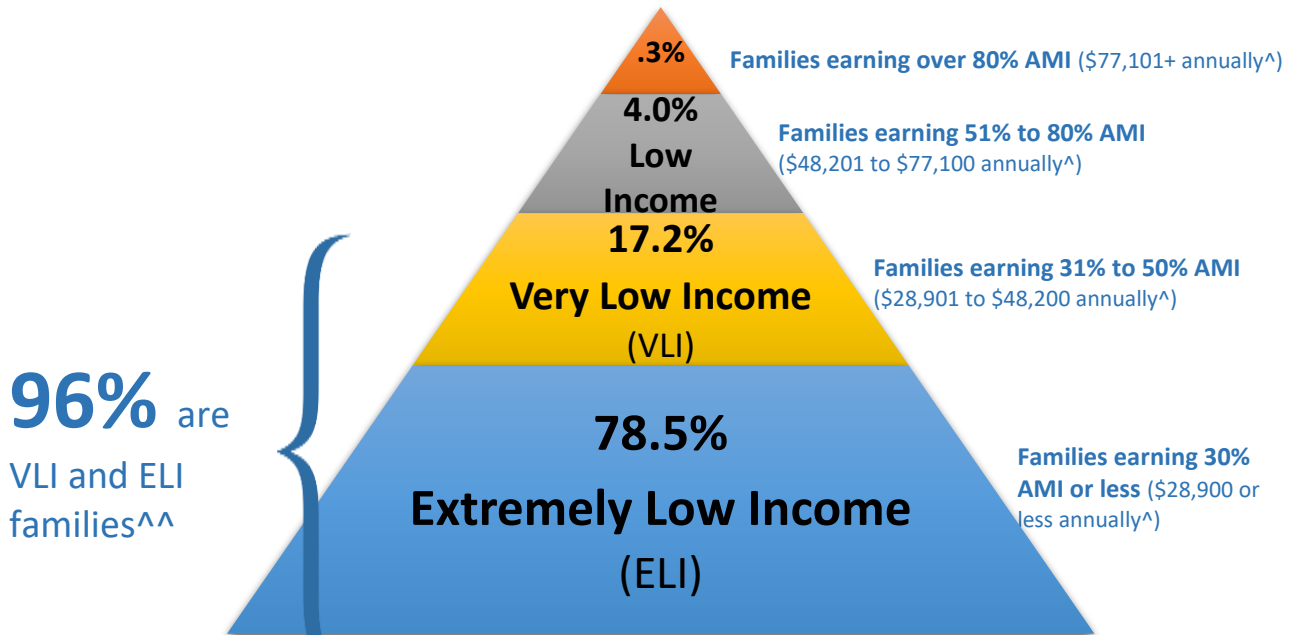


- 100 New HomeFlex Units**  
4 New Agreements Projected
- 244 New DPA\* Awards**  
Issued to First-Time Homebuyers
- 295 Home Again Awards**  
Short-Term Assistance
- 250 New HCV\* Families**  
Net HCV Admissions

AH projects serving **26,797** Households in FY 2024

\* DPA = Down Payment Assistance HCV = Housing Choice Voucher

## Assisted Households Projection by Area Median Income (AMI)^



^HUD publishes the AMI annually. Charted income ranges are based on a family of four and effective April 2022. ^^Source: AH's Data Team.

## FY 2024 Priorities

FY 2024 will be the second year of AH's new Strategic Plan. In alignment with the Plan, AH's FY 2024 priorities include the following goals and objectives that align with its Strategic Plan:

### **Strategic Priority 1: Create and Preserve Affordable Housing Units**

- **Create 1,095 new affordable housing units** through financial closings including new construction, acquisition projects, homeownership assistance, the issuance and lease-ups of tenant-based vouchers (TBVs), and the execution of new HomeFlex Agreements.
- **Preserve 1,069 existing affordable housing units** through the conversion of substantially rehabbed and significantly modernized units under the Rental Assistance Demonstration (RAD) Program and the renewal of existing HomeFlex Agreements.

### **Strategic Priority 2: Enhance Housing Assistance Resources for Atlantans in Need**

- **Provide 295 Home Again awards** to families at risk of housing instability.
- **Award 244 families down payment assistance** to help build intergenerational wealth.

### **Strategic Priority 3: Create Opportunities for Individuals, Families, and Children to Thrive**

- **Create opportunities to thrive** by sponsoring Achieving Connectivity to Create Equity and Self-Sufficiency (ACCESS), supporting local agencies that specialize in providing education and workforce training, by investing in AH-assisted youth and marketing college scholarship opportunities, and by expanding training and job opportunities in established and emerging employment sectors.
- **Achieve or maintain a 67% work/program compliance rate** by assisting compliant families in maintaining employment, while assisting non-compliant families in meeting the minimum work requirement<sup>8</sup> or in returning to the workforce.
- **Narrow the digital divide and create a pathway to higher income** through the ACCESS Program, which provides, hardware, software, and training to assisted families.

### **Strategic Priority 4: Build or Expand Partnerships to Pool Resources and Maximize Impact for the Benefit of Families**

- **Align AH resources and investment** to create healthy, thriving neighborhoods, and provide the opportunity to access essential services for AH residents and participants.

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<sup>8</sup> AH requires work-able participants to be employed an average of 20 hours per week to meet program compliance.

### **Strategic Priority 5: Communicate the Impact of Atlanta Housing’s Work to Atlanta**

- **Create and publish dashboards** to clearly show our programs, the communities we impact, and our progress against our goals.

### **Strategic Priority 6: Strengthen Atlanta Housing Operations**

- **Achieve or maintain a 95% HCV budget utilization rate** through the issuance and lease-up of Tenant-Based Vouchers (TBVs), Special Purpose Vouchers (SPVs), and execution of HomeFlex Agreements.
- **Improve operations** by meeting or exceeding HUD’s new Section 3<sup>9</sup> requirements and reducing our carbon footprint.
- **Reduce operational costs** by generating off-setting revenue streams or streamlining assistance programs and delivering housing services more efficiently.
  - Utilize activities under HUD Notice: PIH-2011-45 (HA) for housing/unit development.
  - Deploy elements under HUD Notice: PIH-2016-05 (HA) for streamlining opportunities.
  - Exercise Housing Opportunity Through Modernization Act (HOTMA) options.
    - Support AH’s Over-Income Limit Policy pursuant to Section 103.
    - Utilize provisions under HUD Notice: PIH-2017-20 (HA) to streamline the initial Housing Quality Standards (HQS) inspection.
    - Utilize MTW flexibility to exceed program cap limits, percentage increases, project cap limits and other limitations not covered under HOTMA.

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<sup>9</sup> Pursuant to HUD Regulation 24 CFR part 75.



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## Ib. INTRODUCTION: PLANNED GOALS & OBJECTIVES

This section summarizes existing MTW-related activities that AH plans to administer, implement, or carry out during the period July 1, 2023 through June 30, 2024.

### A. Short-Term MTW Goals and Objectives

Activities and objectives listed here involve MTW flexibility to administer. AH categorizes and list activity details in alignment with its strategic priorities:

#### CREATE AND PRESERVE AFFORDABLE HOUSING UNITS

##### *Create New Affordable Housing Units*

- AH plans to financially close 9 projects under its **Revitalization Program** that projects to deliver 511 new affordable housing units. Planned projects and unit counts include:
  - Civic Center, 67 AH-assisted units.
  - Englewood II, 183 units (113 AH-assisted; 70 other affordable).
  - Herndon II, 170 units (80 AH-assisted; 90 other affordable).
  - Magnolia Perimeter Homeownership, 18 affordable homeownership units.
  - Mechanicsville Homeownership, 27 affordable homeownership units.
  - West Highlands 2000 Perry Boulevard 25 affordable homeownership opportunities.
  - West Highlands 3B 21 affordable homeownership opportunities.
- AH plans to financially close on 2 projects under its **Gap Financing** activity, which together are projected to deliver 232 new-affordable housing units that are not public housing nor housing choice voucher units. Under this activity, AH anticipates increasing the number of affordable units created, while decreasing its long-term, recurring obligations. Planned projects and unit counts include:
  - 360 Peachtree, 145 units (51 AH=assisted; 94 non-AH assisted).
  - Sylvan Hills II, 87 units (non-AH assisted).
  - AH may size loans to the total number of affordable units in the project, rather than limiting the funding to the number of units in the development project receiving subsidy. AH can decrease its long-term obligations by structuring loans utilizing this method.
- AH will collaborate with development partners to advance projects through construction stages that include:
  - Projects in the Construction/Development Stage:
    - Advance Madison Reynoldstown (870 Memorial Drive), a construction project that will deliver 116 new affordable units at completion.
    - Advance Juanita Gardner (3650 Bakers Ferry Road), a construction project that will deliver 108 affordable units for seniors at completion. AH submitted a disposition application to the Special Applications Center (SAC) during FY 2023. This is a 100% affordable co-investment project with Invest Atlanta.
    - Advance London Townhomes (308 Scott Street), a rehabilitation project that will ultimately deliver 200 units upon completion, where 150 are AH affordable units, 30 units have tax credits, and the balance are market units; 119 of the 150 AH units have already been completed to date.
    - Englewood infrastructure work

- Projects in the Pre-Development Stage:
  - Advance the Flats at Stone Hogan (north/west side of Stone Hogan Connector Road, SW), a construction project that will deliver 256 affordable units. This is a co-investment project with Invest Atlanta.
  - Advance the Villas at Stone Hogan (north/west side of Stone Hogan Connector Road, SW), a construction project that will deliver 190 affordable units. This is a co-investment project with Invest Atlanta.
- AH projects execution of 4 new HomeFlex Agreements under its **HomeFlex as a Strategic Tool** activity to create 100 new subsidized affordable housing units. Planned projects and assisted unit counts include:
  - 277 Moreland Avenue, 54 units.
  - 588 Paines Avenue, 8 units.
  - Abbington at Ormewood, 8 units.
  - McAuley Park Phase I, 30 units.



### **Preserve Affordable Housing Units**

- AH anticipates renewing 13 HomeFlex Agreements during FY 2024 to continue project-base assistance under its **HomeFlex as a Strategic Tool** activity, preserving 754 existing affordable housing units. The communities and unit count includes:
  - Adamsville Green Senior Apartments, 46 units renewed for assistance.
  - Ashton at Browns Mill, 5 units renewed for assistance.
  - Atrium at Collegetown, 114 units renewed for assistance.
  - Avalon Ridge, 89 units renewed for assistance.
  - Gateway at East Point, 100 units renewed for assistance.
  - Imperial Hotel, 90 units renewed for assistance.
  - Mechanicsville Crossing, 30 units renewed for assistance.
  - Mechanicsville Station, 35 units renewed for assistance.
  - O’Hern House, 76 units renewed for assistance.
  - Odyssey at Villas, 32 units renewed for assistance.
  - Quest Village, 10 units renewed for assistance.
  - The Veranda at Auburn Pointe I, 86 units renewed for assistance.
  - Welcome House, 41 units renewed for assistance.

## ENHANCE HOUSING ASSISTANCE RESOURCES

- AH plans to create 244 new affordable housing opportunities under its **Comprehensive Homeownership Program** activity by issuing down payment assistance (DPA) awards to eligible, first-time home buyers. AH will deploy HUD Notice PIH 2011-45 when AH's MTW Agreement does not address any planned activity.
- AH plans to create or improve programs under its **Develop Alternate and Supportive Housing Resources** activity to assist low-income Atlantans that are experiencing or at-risk of homelessness. Point-in-time counts, referrals from partner agencies, and available funding affects the total number of households assisted. Planned household counts and programs include:
  - Assisting up to 295 households through the administration of Home Again.
  - Assisting up to 600 households through the administration and financial oversight of AH's Special Programs Vouchers (AH SPVs). AH creates its SPVs by deploying MTW flexibilities to dedicate use of tenant-based vouchers (TBVs) for targeted population groups. Household counts for AH SPVs include:
    - Assist up to 525 households with HAVEN Continuum of Care (CoC) Vouchers. AH combined several AH SPV Programs to form the HAVEN CoC. This initiative is led by Partners for Home (PFH) and includes collaboration with City of Atlanta, Mercy Care, Grady Health Systems, and the United Way of Atlanta, among others, to assure optimum utilization and voucher performance.
    - Assist up to 75 households with Special Program Vouchers for Homeless Students (SPVHS) as referred by Atlanta Public Schools (APS) System. AH also refers to these vouchers as "APS Vouchers".
- Conduct Housing Quality Standard (HQS) inspections in alignment with AH's **Enhanced Inspection Standards** activity. Under this activity, AH conducts HQS inspections<sup>10</sup> or requires an acceptable alternative inspection method on all unit types receiving financial assistance. Inspections are required in the following capacities:
  - Rental units assisted under AH's HomeFlex, Housing Choice Voucher, and Local, Non-Traditional (LNT) Programs, including AH's Single-Room Occupancy.
- AH will continue to deploy MTW flexibilities to standardize and align property management activities under its **HomeFlex Site-Based On-Site Administration** activity. Portfolio activities include:
  - Administration and oversight of site-based waiting lists and unit assignments, including the assurance of RAD PBV families expressing an interest in Choice Mobility are listed on the RAD PBV waiting list.
  - Ensuring that RAD PBV families on the RAD PBV waiting list have priority of turnover<sup>11</sup> tenant-based vouchers (TBVs) before those TBVs are issued to new applicants on the HCV waiting list
  - Project-basing up to 100% assistance at communities owned directly or indirectly by AH without a competitive procurement process in accordance with its Amended and Restated MTW Agreement.
  - Continue implementation of performance standards through regular, periodic training opportunities and business process reviews (BPRs) for property-manager developers (PMDs) and housing partners at all assisted communities. Activities may also include full implementation of accountability measures at communities assisted by Atlanta Housing.

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<sup>10</sup> Alternative inspections may be accepted by AH.

<sup>11</sup> AH elected to use the alternative component under the Choice Mobility option. This option caps tenant-based turnover vouchers dedicated to RAD PBV families to three-quarters of its turnover pool.

- AH will continue to deploy MTW flexibilities under its **Rent Simplification/AH Standard Deduction** activity to minimize calculation errors and reduce administrative burdens to improve and shorten the lease-up process by factoring its standard deduction in the rent calculation for households meeting medical and dependent eligibility requirements.
- AH will continue to deploy MTW flexibilities under its **Leasing Incentive Fees (LIFs)** activity that assists eligible low-income households. Assistance includes various move-in expenses paid to the landlord on behalf of assisted families to assist in removing lease-up barriers.

## **CREATE OPPORTUNITIES FOR INDIVIDUALS, FAMILIES, AND CHILDREN TO THRIVE**

### *Create Opportunities for Economic Mobility*

- AH will continue to deploy MTW flexibilities under the **Good Neighbor Program II** activity to require new Housing Choice Program admissions to complete the prescribed curriculum, which is designed to prepare residents for living in mixed-income communities and areas of opportunity.

### *Achieve or Maintain a 67% Work/Program Compliance Rate*

- AH will continue to deploy MTW flexibilities under its **Work/Program Requirement** activity to require new and existing targeted households (non-disabled, 18 to 61 years old) to be employed for an average of 20-hours per week. AH works to provide resources with guidance to targeted households to help them to meet the program requirements.
- AH will continue to deploy MTW flexibilities under its **Human Development Services** activity to assist HCV households in achieving or moving closer to economic independence and housing self-sufficiency through coaching and referrals based on their need. Overall programming plans include:
  - Increasing FSS enrollment to support more families and more funding opportunities for an additional Program Coordinator.
  - Providing employment related supportive services, including local and metro employment referrals, job coaching and support to navigate job-related challenges; and assist residents with improving soft skills, training, and employment preparation or training.
  - Providing learning opportunities to AH-assisted households through workshops, after-school programming, and summer camps for children.



AH does not have short-term activities supporting its remaining Strategic Plan goals that require MTW flexibilities.

### NEW MTW ACTIVITIES

- AH proposes **AW.2024.01 – Eliminate/Reduce Interim Examinations**, to limit family-initiated interim requests to one per recertification period, including biennial and triennial recertification schedules. AH conducts a substantial number of interim requests initiated by program participants significantly increasing AH's workload. AH expects to eliminate or reduce the total number of interim examinations annually with this activity. AH's goal is to stop households from requesting multiple interims during their recertification period to gain rental assistance increases, to lower rent share, or to gain larger voucher/unit size, unless a hardship is warranted. AH projects implementing this activity for new admission households on July 1, 2023, and at the next scheduled or initiated examination for existing households. Temporary exemptions from this policy will be considered on a case-by-case basis in alignment with its Hardship Policy.

### CURRENT MTW ACTIVITIES

- AH plans to continue exercising elements of its Amended and Restated MTW Agreement to continue existing MTW Activities (as described in Section IV.A. Implemented Activities) to permit AH to administer its programs to address local issues and challenges unique to the City of Atlanta.

### DATED MTW ACTIVITIES

- AH elects to suspend or close functionally obsolete activities as shown under Section IV.B-D:
  - AH initiated the close out process of **RE.2005.09 - Reformulating the Subsidy Arrangement in Mixed-Use Communities** during FY 2023. This activity helped AH to create assisted units at Centennial Place before the introduction of HUD's Rental Assistance Demonstration (RAD) Program. AH has not utilized flexibilities under this activity since the inception of RAD and subsequent approval to convert a portion of its public housing portfolio. In addition to RAD, HUD offers AH the ability to develop or modernize public housing units under its Faircloth Authority<sup>12</sup> and then the ability to immediately convert those units to long-term Section 8 assistance under the *Faircloth-to-RAD* option. These strategies will allow AH to finalize the close out process of this activity in FY 2024.
  - AH initiated the close out process of **HC.2007.02 - Rent Reasonableness** during FY 2023 since this is a policy requirement of MTW Public Housing Authorities (PHAs). AH meets this policy requirement, which is captured in various AH documents, such as its Statement of Corporate Policies (SCP), operating manuals, and other guidance materials. Since this is a requirement and there is not a metric to report outcomes, AH finalizes the close out process of this activity while continuing to maintain appropriate reasonable rent policies.

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<sup>12</sup> 24 CFR § 905.604.

## B. Short-Term Non-MTW Goals and Objectives

Goals and objectives listed here do not require deployment of MTW flexibility to administer. AH continues to organize these activities based on their alignment with the agency's strategic priorities:

### CREATE AND PRESERVE OF AFFORDABLE HOUSING UNITS

#### *Create New Affordable Housing Units*

AH will continue to advance its real estate development pipeline during FY 2024. Development pipeline activities include positioning projects for financial closing, investigating and consummating acquisition opportunities, reviewing homeownership components, and undertaking other activities to achieve housing development goals. Highlighted activities include:

- Financially close on Scholars Landing Condos to deliver 8 affordable homeownership opportunities for low-income Atlantans when construction is completed.
- AH will continue to administer its Homeownership Initiative Plan at AH-owned sites. FY 2024 homeownership sites include:
  - Herndon
  - Magnolia Perimeter
  - Mechanicsville,
  - Scholars Landing, and
  - West Highlands.
- AH seeks to improve its carbon footprint and reduce the energy burden for residents. Therefore, AH may further advance its AHGreen goals by incorporating design recommendations into the developer Request for Proposal/Quote (RFP/RFQ) process, adopting AHGreen development standards, and monitoring long-term progress. AH may also include AHGreen requirements in substantial rehabilitation and significant modernization contracts as well.
- AH submitted a 2022 Choice Neighborhoods Implementation Grant for its Bowen Homes site in FY 2023 and plans to implement this grant should AH receive an award. If AH does not receive a grant award, AH plans to apply in FY 2024. Other Choice Neighborhoods Planning or Implementation Grants could be submitted for Hollywood Courts, Thomasville Heights, or other eligible projects, if conditions allow.
- AH owns more than 400 vacant acres within the city boundaries and plans to develop or re-develop these parcels, as appropriate. Current plans for these acres include:
  - Executing new or renewing existing ground leases to carryout activities associated with the creation or preservation of affordable housing units in Atlanta's housing stock.
  - Continuing repurposing activities on AH-owned acres to add new affordable housing to Atlanta's housing stock. Planned acres and project sites include:
    - 25 acres at Bowen I and VI sites.
    - 36 acres (a portion thereof) at the Thomasville site.
    - 4 acres at the North Avenue site.
    - AH may evaluate the feasibility of acquiring parcels that align with AH's priorities to create or preserve affordable units in Atlanta's housing stock. Acquisition methods may include land swaps or other non-monetary transactions.
  - Continuing self-development activities focused on construction of single-family homes that may use modular or stick built techniques.
  - Submitting appropriate applications to the Special Applications Center (SAC) (see page 124 of Appendix E) to properly dispose of vacant or developed parcels, including the demolition of structures. Activities may include executing new ground leases to conduct activities or seek to acquire parcels in accordance with development agreements.

### Preserve Existing Affordable Housing Units

- AH plans to convert 2 public housing communities to long-term Section 8 PBV assistance under the RAD Program to preserve 315 affordable units. Conversion activities may require unit rehabilitation or modernization to meet RAD program requirements. Planned conversion projects include:
  - 282 units at Cosby Spear Highrise.
  - 33 units at Villages at Carver II.
- The RAD Program has a sunset date of September 2024 (AH FY 2025). Consequently, AH plans to closely monitor the conversion process to ensure its public housing portfolio planned for conversion under RAD receives full consideration before the program expires. Because of the reduced time, AH may submit a RAD application or multiple RAD applications to convert remaining public housing units to long-term Section 8 project-base voucher assistance under the RAD Program (see page 125 of Appendix E).
- In the preservation of affordable units, AH may utilize RAD Section 18, which, if deployed, would allow AH to replace converted units with RAD PBV and non-RAD PBV units at partially or totally disposed conversion sites. Housing Construction Costs (HCC), published by HUD, determine the number of eligible units that AH may dispose of under Section 18 at a converted site.



### ENHANCE HOUSING ASSISTANCE RESOURCES

AH operates two rental programs, tenant-based and project-based. Both programs assist eligible, low-income Atlantans with housing needs.

- AH's **tenant-based rental assistance (TBRA) program** comprises vouchers inside and outside of the city. In general, assistance provided under TBRA follows the family and includes the following:
  - Tenant-Based Vouchers (TBVs) administered by AH total more than 10,850:
    - More than 85% of AH's TBVs are utilized inside Atlanta city limits, with voucher holders paying 30% of their income toward rent and choosing where to live and AH providing rental assistance to the property owner.
    - More than 1,350 voucher holding families live outside Atlanta city limits (port-outs). In these cases, the family still pays 30% of their income toward rent, but AH is responsible for the balance of the rent at the jurisdictional rate where the family resides until that authority absorbs the family onto their program.
    - AH supports 12 families on its HCV Homeownership Program<sup>13</sup>. The remaining families receive monthly mortgage assistance from AH. AH now directs interested home buyers to AH's Down Payment Assistance (DPA) Program.
    - AH administers a Single-Room Occupancy (SRO) Program and will continue to evaluate program effectiveness and community acceptance.
  - Special Purpose Vouchers (SPVs) overseen by AH consists of HUD SPVs dedicated for specific uses or population groups. Planned household counts and programs include:
    - Assisting up to 300 households with Family Unification Program (FUP) Vouchers.
    - Assisting up to 73 households with Mainstream Five (MS5) Vouchers.
    - Assisting up to 175 households with Near-Elderly, Disabled (NED) Vouchers (formerly Mainstream One or MS1).
    - Assisting up to 270 households with Veterans Affairs Supportive Housing (VASH) vouchers
- AH may explore the benefits of re-engineering by outsourcing many day-to-day HCV functions as a means to increase efficiencies.

<sup>13</sup> AH no longer sponsors any new families under the HCV Homeownership Program.

- AH's **project-based voucher program** consists of subsidized units at AH-Owned, Mixed-Income, and HomeFlex Communities. In general, assistance under this format remains with the unit. AH provides oversight and training related to asset management, property operations, and program compliance for more than 10,600 units and 117 communities:
  - Public Housing Units receive subsidy under the Section 9 Program. AH oversees administrative and financial compliance of 2,421 units located at AH-Owned and Mixed-Income communities. AH utilizes management agreements at AH-Owned communities.
  - RAD PBV and Non-RAD PBV Units are former public housing units. There are 1,613 total units subsidized under the Section 8 Program at 16 communities. AH oversees administrative and financial compliance of these units located in redeveloped, mixed-income communities.
    - AH will continue to monitor RAD PBV families expressing Choice Mobility interest to ensure that these families receive priority issuance of AH turnover TBVs. AH opted to utilize the alternative component under the RAD Program to cap the number of tenant-based turnover vouchers dedicated to RAD PBV families<sup>14</sup>.
  - HomeFlex Units are market units made affordable through a monthly subsidy on behalf of eligible families at one of 6,587 units in 94 communities receiving project-based assistance.
  - Local, Non-Traditional (LNT) Units are affordable units across Atlanta at mixed-income communities because of AH investments. In this instance, LNT units are Low-Income Housing Tax Credit (LIHTC) units and not considered in other programs. There are 2,803 LIHTC units.
- AH plans to engage in activities that support planned projects using Low-Income Housing Tax Credit (LIHTC) applications as submitted by development partners for planned projects.
  - AH plans to update its underwriting model to increase its return on investment (ROI) while factoring the “twinning”<sup>15</sup> of 4% and 9% tax credits and other current issues/developments associated with tax credit applications and requirements.
- AH may utilize remaining funds under the Choice Heritage Program to provide an owner-occupied rehabilitation award<sup>16</sup> or partial award to preserve owner-occupied units within the University Choice Neighborhoods (UCN) area.
- AH plans to update the Housing Plan for its UCN Implementation Grant, oversee the occupancy and operations of the newly rehabilitated Roosevelt Hall, and sunset the right-to-return policy for former University Homes residents.
- AH plans to finalize closing elements of the HUD-approved Critical Community Improvements (CCI) Plan. Close out actions include finalizing expenditures from available funding sources, financial close out of acquired properties, final issuance of rehabilitation awards for low-income homeowners, and final contributions to place-making enhancements throughout the UCN.
  - Place-making enhancements to improve UCN corridors may include planters, landscaping, artwork, streetscape and resurfacing, decorative bus stop shelters, etc.



*Owner-Occupied Rehabilitation*

<sup>14</sup> AH can limit turnover vouchers for RAD PBV families to three-quarters of its turnover pool by using the alternative Choice Mobility element under the RAD Program.

<sup>15</sup> “Twinning” is AH’s ability to combine 4% and 9% tax credits in the same project, which can allow for more tax credit equity.

<sup>16</sup> AH suspended in-person activities in response to COVID-19. AH plans to resume in-person projects pursuant to pandemic protocols.

- AH plans to conduct inspection methods appropriate to assistance program by integrating inspection methods associated with the National Standards for the Physical Inspection of Real Estate (NSPIRE) Demonstration Program at public housing units within its portfolio while continuing Real Estate Assessment Center (REAC) inspections for public housing units at mixed-income communities and applying Enhanced Inspection Standards for units assisted by HomeFlex, AH's Project Base Voucher Program. In all cases, AH will inspect or accept alternative inspection results for units receiving AH assistance.
- AH will pursue federal, philanthropic, and other opportunities to secure bond funds, grant awards, tax credits, and other assistance, to create and preserve affordable housing units and offer services to assisted households in alignment with AH goals.

## **CREATE OPPORTUNITIES FOR INDIVIDUALS, FAMILIES AND CHILDREN TO THRIVE**

- AH will continue to offer various programs designed to help AH-assisted households at various stages in life. AH plans to offer the following programs or supportive services:
  - Achieving Connectivity to Create Equity, and Self-Sufficiency (ACCESS), a training program focused on preparing low-income Atlantans for higher-paying job opportunities in the technology sector. AH plans 3 cohorts during FY 2024.
  - Atlanta Achievers Program is a collection of activities focused on AH-assisted youth. Activities may include youth leadership and after-school/summer camp programming, as well as the promotion of activities that prepare AH youth for adulthood.
  - Human Development Services focuses on upward mobility of new and existing TBV households residing throughout AH's service jurisdiction and the administration of Family Self-Sufficiency (FSS) activities. Upward mobility activities may include, assisting households in improving soft skills for employment, coordination of life skills training, including facilitating healthcare services, financial literacy, and related topics. Other activities may include the facilitation of workshops to help understand lease agreements and other housing-related topics.
  - Resident Initiatives is a collection of activities coordinated by AH Resident Service Coordinators to assist resident councils, facilitate reasonable accommodation requests, and act as a liaison between residents and Property-Manager Developers (PMDs) at AH-owned communities. Regular events may include the coordination of workshops focused on the wellbeing of AH-assisted families and activities that promote healthy living and stress management.
  - HomeFlex Supportive Housing (HAVEN), an effort to create opportunities for vulnerable AH-assisted population groups and provide supportive services through the utilization of service agreements in supportive housing communities within AH's service jurisdiction.
- Designated Service Coordination is not a program, but the facilitation of activities for HomeFlex-assisted households residing in mixed-income communities assisted under AH's HomeFlex Program. Designated Service Coordinators do not provide core services but provides general assistance and referral services to HomeFlex assisted households.
- AH will continue to review the performance of contracted service providers to increase outcomes for participating AH-assisted families, which may include modifying contracts to target efforts to improve processes and performance.



## **BUILD OR EXPAND PARTNERSHIPS TO POOL RESOURCES AND MAXIMIZE IMPACT FOR THE BENEFIT OF FAMILIES**

- AH plans to continue overseeing the delivery of supportive services by University Choice Neighborhoods (UCN) case managers and service providers that connect participants to workforce development and employment opportunities.
  - Continue the “Building Blocks for Success” program, which supports the “People” element of AH’s UCN Initiative. This program works closely with the four public schools that serve AH-assisted youth within the UCN boundaries.
  - Facilitate the coordination of access to literary resources in collaboration with Atlanta Book Rich Environments Program, the National Book Foundation, the Atlanta-Fulton County Library System, and others.
  - Maintain oversight of supportive services delivered by UCN case managers and service providers to connect participants to early childhood development, after-school, summer, and STEM/STEAM programming, college preparatory, and continuing education opportunities.
  - Oversee the delivery of supportive services by UCN case managers and service providers to connect participants to coaching and counseling, health and wellness, and aging-in-place activities.
- AH will continue to increase its diversity and inclusion efforts in its contracting and human resources practices, including recruitment from AH’s assisted population, while increasing outreach efforts to Atlanta’s Hispanic and Latino populations, and recognizing companies that employ a workforce meeting Section 3 benchmarks.
- John Hope Community EnVision Center, a collaborative effort between AH and the John Hope Community Center to offer range of educational and supportive services to the community and AH-assisted households in alignment with HUD’s EnVision Program.
- AH will continue to design its AHGreen Program to train AH-assisted households in preparation for Green Sector jobs, which often have higher living wage pay.
- Human Development Services focuses on upward mobility of voucher holding families in the HCV Program. Non-MTW activities may include, assisting households in improving soft skills for employment, coordination of life skills training, including facilitating healthcare services, financial literacy, and related topics. While other activities may include the facilitation of workshops regarding lease agreements.

## **COMMUNICATE THE IMPACT OF ATLANTA HOUSING’S WORK TO ATLANTA**

- AH will continue to diversify and strengthen its messaging platforms to keep assisted families informed and improve internal and external stakeholder connections to AH successes, progress, and collaborative opportunities.
- AH will continue to provide volunteer opportunities for AH staff to give back to the community through AH Cares, which provides variety of opportunities through activities and events.

## **STRENGTHEN ATLANTA HOUSING OPERATIONS**

- As costs increase for AH and AH seeks to assist more families, AH must embrace strategies and techniques achieve greater efficiency and/or maintain operational expenses at optimal levels. Such strategies and techniques include identifying and researching revenue generating opportunities that help offset operational expenditures, as well as optimizing operational costs that may include revising its role in development and redevelopment projects, assistance agreements, and other strategies that help AH achieve its goals.
- AH will continue to conduct administration and maintenance Business Process Reviews (BPRs) at all Mixed-Income and HomeFlex communities, including accessibility requirements contained in the Voluntary Compliance Agreement between HUD FHEO<sup>17</sup> and AH.

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<sup>17</sup> Office of Fair Housing and Equal Opportunity

## C. Long-Term MTW Goals and Objectives

AH may propose these initiatives in the future. They are in various stages of the vetting process.

### CREATE AND PRESERVE AFFORDABLE HOUSING UNITS

- AH may continue to explore the feasibility of adopting a modular housing initiative and associated construction methods and techniques under its **Revitalization Program** activity. This initiative is consistent with AH's priorities to increase the affordable housing units in Atlanta.
  - Under this this initiative, AH may evaluate the viability of self-development, selling lots, and servicing mortgages to ensure housing affordability.
- AH will continue to explore the feasibility of adding commercial ventures under its **Revitalization Program** activity to create areas of high opportunity or amenity-rich communities that also include the potential to create employment opportunities. Commercial initiatives fall within AH's Amended and Restated MTW Agreement and its development strategy to revitalize communities and build healthy neighborhoods.
- AH will continue to position itself to issue short-term construction loans or similar funding products to innovatively advance public-private development projects under AH's **Gap Financing** activity. Short-term loans are consistent with AH's development strategy to increase affordable housing units in Atlanta while continuing to collaborate with various agencies, organizations, and developers. Furthermore, AH may also explore the following:
  - Creation of long-term investment vehicles in alignment with the long-term development of affordable residential communities.
  - Investigating loan program activities that align with elements of HUD Notice PIH 2011-45 or its MTW Agreement and in cooperation with the Urban Revitalization Division.
  - AH will continue to build on its plans to size loans to the total number of affordable units within a development, instead of limiting the funding to the number of units receiving subsidy. This modification increases the number of affordable units created and decreases AH's long-term obligations.
- AH will advance the **Choice Neighborhoods Down Payment Assistance (Choice DPA) Program** activity by advancing the creation of 16 new affordable homeownership opportunities (Towns at Scholars Landing (8) and Ashley Scholars Landing Condos (8)). Under this activity, AH will provide Choice DPA awards to eligible, first-time homebuyers purchasing homes in the University Choice Neighborhoods (UCN) boundaries.
- AH will continue to collect information to evaluate the feasibility of deploying MTW flexibilities to create a **Total Development Cost (TDC) Schedule** activity that aligns with AH's urban development challenges and allows AH to contribute to its projects at a higher level.

### ENHANCE HOUSING ASSISTANCE RESOURCES

- AH will continue to monitor local housing demand and specific population groups to re-calibrate its resources to **Develop Alternate and Supportive Housing Resources** that provide housing stability for chronically homeless households, households at-risk of homelessness, or households needing temporary assistance. AH refers households that need immediate or intensive assistance to local organizations that specialize in such assistance.
- AH will monitor the outcomes of AH-assisted households to evaluate the performance of local service providers to determine future investment in service, or future service provider selection.

## CREATE OPPORTUNITIES FOR INDIVIDUALS, FAMILIES, AND CHILDREN TO THRIVE

- AH may modify this activity based on evaluation performance of AH's **Work/Program Requirement** activity. To determine the effect on or success of participants' employment status, review of activity may include the following monitored metrics:
  - Earned household income (decrease/increase changes),
  - AH subsidies share or per unit costs and rent-roll or tenant share impact,
  - Household or individual job stabilization,
  - Program compliance counts and rates, and
  - AH may also explore alternative strategies, such as layered or tiered rent techniques to promote an acceptable compliance rate and reduce the number of non-compliant households.
- AH may propose an activity that considers extending program participation for AH-Assisted households that graduate from a job-training programs sponsored or supported by AH. The program extension under consideration would add an additional 6 months before program termination. Current AH assisted programs include:
  - ACCESS, a training program designed to prepare low-income Atlantans for higher-paying job opportunities in the technology sector.
  - AHGreen, an AH initiative that plans to prepare AH-assisted households for green sector jobs.

## BUILD OR EXPAND PARTNERSHIPS TO POOL RESOURCES AND MAXIMIZE IMPACT

- AH may propose incentives for residents under the **Human Development Services** activity to improve the success of participating households and encourage steps towards economic mobility such as, completion/graduation of a training program, securing employment, reporting a wage above Atlanta's poverty wage, or other significant metrics. Preliminary incentive concepts include:
  - Preliminary consideration includes disregard child support income, provision of childcare or transportation assistance, payment of or reimbursement for GED testing fees or training, initial purchase of work uniforms or work-related tools, or other incentives up to a specific amount to help create a culture of learning or stable employment among assisted households.

## STRENGTHEN ATLANTA HOUSING OPERATIONS

### *Improve Operations*

- AH will continue to review existing MTW Activities to identify functional obsolescence caused by changes in strategic priorities or HUD guidance while retaining **activities that benefit assisted families, their communities, and AH**. Activity reviews also seek to identify underperforming activities.

### *Reduce Operational Costs*

- AH will continue to monitor the performance of its **Utility Allowance (UA) Schedules** to determine if AH needs to deploy MTW flexibilities to create more efficient and effective schedules that may accomplish the following:
  - Encourage program participants to seek energy efficient units.
  - Simplify and potentially, electronically systematize UA Schedules to minimize calculation errors and reduce processing delays.
- AH will continue to review current operations to identify opportunities for improvement, such as overall initiatives that promote cost efficiency and effectiveness that may include:
  - Reducing AH's share of subsidy or per unit cost,
  - Increasing revenue-generating opportunities, or
  - Eliminating or reducing zero-income and negative rent scenarios that create utility assistance or reimbursement payments (UAPs/URPs) and the perception of AH "paying" families to be program participants.

## D. Long-Term Non-MTW Goals and Objectives

AH will continue evaluate potential activities for inclusion in future MTW Plans. Activities listed below do not require deployment of MTW Authorizations. Highlighted topics for FY 2024 include:

### CREATE AND PRESERVE AFFORDABLE HOUSING UNITS

#### *Create New Affordable Housing Units*

- AH will continue activities to create new AH subsidized units utilizing its Faircloth Authority<sup>18</sup>. AH can add up to 9,136<sup>19</sup> additional units. Upon completion, AH may convert those units to long-term Section 8 PBV assisted units under HUD's *Faircloth-to-RAD* option. Currently, AH is considering using this resource to create new AH subsidized units in the following planned developments:
  - Civic Center Phase I
  - Englewood IIA
  - North Avenue Phase I
  - Thomasville Phase I
  - 360 Peachtree Phase I
  - AH may also evaluate the viability of remaining in or returning to a direct ownership in future transactions or remaining in a sponsor/support role as it develops AH-owned land.
- AH will continue to advance its pipeline of development and redevelopment projects in phases, which may include:
  - Ashley Scholars Landing
  - Bowen Homes
  - Civic Center
  - Englewood
  - Herndon Homes
  - Hollywood Courts
  - North Avenue
  - Palmer Phase
  - Thomasville Heights
  - Vacant properties that are the subject of ongoing litigation, and which AH may dispose of through ground lease or land sales to development partners (see page 124 Appendix E)
- AH will continue to develop its long-term real estate financial forecast to identify capital needs. Activities may include designing or improving development plans for AH-owned land, promoting green infrastructure within new, rehabilitated, and modernized developments, or deploying the latest construction technology to increase affordable housing units in Atlanta's housing stock.
- AH will evaluate strategies and techniques that position AH to engage in self-development activities, including construction lending and asset ownership and management.
- AH may begin infrastructure improvements at AH-owned sites to implement planned revitalization activities. AH will lead infrastructure improvements based on parcel ownership.
  - AH will seek funding sources that support infrastructure, environmental sustainability, and community revitalization efforts.
- AH will continue to explore alternative funding structures that allow AH to participate in HomeFlex and other real estate deals at different junctures and in distinct roles to create and preserve affordable housing units. Conceptual roles may include serving as the lender, loan servicer, or development partner before, during, and after project activities.

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<sup>18</sup> Under Faircloth, AH can construct public housing units with HUD construction dollars.

<sup>19</sup> As of September 30, 2021.

### **Preserve Affordable Housing Units**

- AH will continue to monitor its affordable unit preservation strategy to assure AH's goals and objectives complement the project management schedule to complete substantial community rehabilitation or significant unit modernization to meet RAD requirements, as well as submitting appropriate applications to secure a Commitment to enter a Housing Assistance Payments (CHAPs) contract. Planned activities may include:
  - Identifying subsidy-only conversions to accelerate the conversion process.
  - Evaluating long-term capital needs for AH-owned facilities not primed to convert subsidy programs and improve utility efficiency ratings.
    - Maximize energy and water efficiency in RAD conversions.
    - Encouraging existing and future housing partners to improve water and energy efficiency at rentals.
  - Ensure expiring HomeFlex Agreements align with AH's long-term preservation goals prior to renewal of agreements. For example, AH will evaluate whether it can enter an acquisition deal rather than an assistance deal or acquire tax credit properties from owners to preserve affordability at that property.
- AH may develop a strategy to preserve naturally affordable or expiring units not currently in AH's portfolio.
  - AH may issue bond instruments to fund new construction and substantially rehabilitated development projects that add affordable housing units to the Atlanta housing stock.

### **ENHANCE HOUSING ASSISTANCE RESOURCES**

- AH will assess the feasibility of applying for a Choice Neighborhoods Planning Grant for Bankhead or other eligible former public housing sites based on AH's goals and objective.
- AH plans to advance the development of affordable homeownership opportunities on AH-owned land utilizing fee-simple land sales or a land trust form of ownership to assure long-term affordability. Land sales, construction, and homeownership closings may include reduced land value, an AH investment, or AH down payment assistance to support affordability. AH may also pursue long-term affordability through land dispositions, collaboration with land trusts, and similar activities.

### **CREATE OPPORTUNITIES FOR INDIVIDUALS, FAMILIES, AND CHILDREN TO THRIVE**

- AH will continue to develop and expand the Atlanta Achievers Program by facilitating programs and workshops to help successfully transition AH-assisted youth into adulthood, as well as explore incentives that complement its Summer Internship Program and increase FSS Program enrollment.

### **BUILD OR EXPAND PARTNERSHIPS TO POOL RESOURCES AND MAXIMIZE IMPACT**

- AH will seek new and renewed sources of funding and partnerships to complement neighborhood revitalization projects, as well as executing master developer agreements and initiating building designs.
- AH seeks to acquire properties from HomeFlex housing partners when the property owner no longer desires to participate in the HomeFlex Program and the partner is willing to sell their property. AH will evaluate the feasibility of these opportunities. Additionally, AH will also evaluate the viability of acquiring expiring tax credit properties from respective property owners to extend affordability and position AH to gain significant ownership roles in these deals.

## STRENGTHEN ATLANTA HOUSING OPERATIONS

### *Improve Operations*

- AH desires to increase the percentage of AH-assisted units that achieve a 35% or higher level of green certification.
- AH will continue evaluating the outcomes of its AHGreen Initiative to ensure commitments and performance are in alignment with its environmental sustainability strategies. Future concepts and strategies may include:
  - Coordinating resources to reduce utility costs for assisted households and improving the energy efficiency of units.
  - Developing strategies to achieve net zero carbon emissions, over time at the AH administrative buildings (230 John Wesley Dobbs, Roosevelt Hall, and Zell Miller).
  - Exploring the financial feasibility of attaching solar panels to AH-owned buildings.
  - Starting an urban solar farm by utilizing “undevelopable,” AH-owned parcels.
  - Exploring the feasibility and strategically growing and supporting AHGreen initiatives focused on increasing the number of assisted energy-efficient units and lowering the utility costs for AH-assisted families, reducing AH’s carbon footprint, and moving AH towards a “Green Certified Workplace.”
  - AH seeks to meet or exceed HUD’s new Section 3<sup>20</sup> requirements.

### *Reduce Operational Costs*

- AH will continue to investigate revenue generating opportunities that increase non-federal funding. For example, AH may lease vacant land and its air space for community events and communication towers.
- AH may also seek authorization to issue bond financing vehicles to fund new construction and substantially rehabilitated development projects that add affordable housing units within Atlanta.

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<sup>20</sup> Pursuant to HUD Regulation 24 CFR part 75.



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## II. GENERAL OPERATING INFORMATION

### A. Housing Stock Information

#### i. Planned New Public Housing Units

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

ASSET MANAGEMENT PROJECT (AMP) FILL IN NAME AND NUMBER	0/1 BRs	2 BRs	3 BRs	4 BRs	5 BRs	6+ BRs	TOTAL UNITS	POPULATION TYPE	Section 504 Accessible Units	
									(Mobility)	(Hearing/Vision)
Name/Number	0	0	0	0	0	0	0	Type (below)	0	0
Name/Number	0	0	0	0	0	0	0	Type (below)	0	0
Name/Number	0	0	0	0	0	0	0	Type (below)	0	0

<b>Total Public Housing Units to be Added in the Plan Year:</b>	<b>0</b>
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\* The federal accessibility standard under HUD's Section 504 regulation is the Uniform Federal Accessibility Standards (UFAS) for purposes of Section 504 compliance (24 CFR 8.32). HUD recipients may alternatively use the 2010 ADA Standards for Accessible Design under Title II of the ADA, except for certain specific identified provisions, as detailed in HUD's Notice on "Instructions for use of alternative accessibility standard," published in the Federal Register on May 23, 2014 ("Deeming Notice") for purposes of Section 504 compliance, <https://www.govinfo.gov/content/pkg/FR-2014-05-23/pdf/2014-11844.pdf>

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

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

N/A
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#### ii. Planned Public Housing Units to be Removed

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

AMP NAME AND NUMBER	NUMBER OF UNITS TO BE REMOVED	EXPLANATION FOR REMOVAL
Cosby Spear Highrise /GA006000241	282	PH units converted to PBV units under the RAD and/or Section 18 Blend Program.
Village at Carver (Phase II) /GA006000850	33	PH units converted to PBV units under the RAD and/or Section 18 Blend Program.
<b>TOTAL:</b> Public Housing Units to be Removed in the Plan Year	<b>315</b>	

**iii. Planned New Project-Based Vouchers**

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

PROPERTY NAME	NUMBER OF VOUCHERS TO BE PROJECT-BASED	RAD?	DESCRIPTION OF PROJECT
277 Moreland Avenue	54	No	PBV unit creation under AH's HomeFlex Supportive Housing Program (HAVEN).
588 Paines Avenue	8	No	PBV unit creation under AH's Standard HomeFlex Program.
Abbington at Ormewood	8	No	PBV unit creation under AH's HomeFlex Supportive Housing Program (HAVEN).
McAuley Park Phase I	30	No	PBV unit creation under AH's HomeFlex Supportive Housing Program (HAVEN).
Cosby Spear Highrise	282	Yes	PH units converted to PBV units under the RAD and/or Section 18 Blend Program.
Village at Carver (Phase II)	33	Yes	PH units converted to PBV units under the RAD and/or Section 18 Blend Program.
<b>TOTAL:</b> Planned new Project Based Units in Plan Year	<b>415</b>		

**iv. Existing Project-Based Vouchers**

Tenant-based vouchers that the MTW PHA is currently project-basing in the Plan Year. These include only those in which at least an AHAP is already in place at the beginning of the Plan Year. Select one of the following to indicate the \*\*Planned Status by the end of the Plan Year: “Committed,” “Leased,” or “Issued.” In column three, indicate whether the unit is included in RAD.

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	PLANNED STATUS AT END OF PLAN YEAR*	RAD?	DESCRIPTION OF PROJECT
395 James P. Brawley Drive	20	Leased	No	PBV unit creation under AH's Standard HomeFlex Program.
507 English Avenue	6	Leased	No	PBV unit creation under AH's Standard HomeFlex Program.
55 Milton	18	Leased	No	PBV unit creation under AH's Standard HomeFlex Program.
Academy Lofts at Adair Park	5	Leased	No	PBV unit creation under AH's Standard HomeFlex Program.
Adamsville Green	35	Leased	No	PBV unit creation under AH's Standard HomeFlex Program.
Adamsville Green	46	Leased	No	PBV unit creation under AH's HomeFlex Supportive Housing Program (HAVEN).
Arcadia at Parkway Village	116	Leased	No	PBV unit creation under AH's Standard HomeFlex Program.
Ashley Auburn Pointe I	8	Leased	No	PBV unit creation under AH's Standard HomeFlex Program.
Ashley I at Scholars Landing	54	Leased	No	PBV unit creation under AH's Standard HomeFlex Program.
Ashton at Browns Mill	74	Leased	No	PBV unit creation under AH's Standard HomeFlex Program.
Ashton at Browns Mill	5	Leased	No	PBV unit creation under AH's HomeFlex Supportive Housing Program (HAVEN).
Atrium at CollegeTown	114	Leased	No	PBV unit creation under AH's Standard HomeFlex Program.
Avalon Park Family	53	Leased	No	PBV unit creation under AH's Standard HomeFlex Program.
Avalon Park Senior	136	Leased	No	PBV unit creation under AH's Standard HomeFlex Older Persons Program.
Avalon Ridge Family	89	Leased	No	PBV unit creation under AH's Standard HomeFlex Program.
Brightstone at DeKalb Medical Parkway	175	Leased	No	PBV unit creation under AH's Standard HomeFlex Program.
Campbell Stone	236	Leased	No	PBV unit creation under AH's Standard HomeFlex Program.
Capitol Gateway II	16	Leased	No	PBV unit creation under AH's Standard HomeFlex Program.
Capitol View	43	Committed	No	PBV unit creation under AH's Standard HomeFlex Program.
Capitol View	24	Committed	No	PBV unit creation under AH's HomeFlex Supportive Housing (HAVEN) Program.

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	PLANNED STATUS AT END OF PLAN YEAR*	RAD?	DESCRIPTION OF PROJECT
Centennial Place I	74	Leased	No	PBV unit creation under AH's Standard HomeFlex Program.
Centennial Place II	70	Leased	No	PBV unit creation under AH's Standard HomeFlex Program.
Centennial Place III	74	Leased	No	PBV unit creation under AH's Standard HomeFlex Program.
Centennial Place IV	83	Leased	No	PBV unit creation under AH's Standard HomeFlex Program.
Columbia Colony Senior	62	Leased	No	PBV unit creation under AH's Standard HomeFlex Older Persons Program.
Columbia Commons	15	Leased	No	PBV unit creation under AH's Standard HomeFlex Program.
Columbia Heritage	124	Leased	No	PBV unit creation under AH's Standard HomeFlex Program.
Columbia High Point (Senior)	94	Leased	No	PBV unit creation under AH's Standard HomeFlex Older Persons Program.
Columbia Mechanicsville Apartments	35	Leased	No	PBV unit creation under AH's Standard HomeFlex Program.
Columbia Mechanicsville Parkside	32	Leased	No	PBV unit creation under AH's Standard HomeFlex Program.
Columbia Senior Residences at Blackshear	78	Leased	No	PBV unit creation under AH's Standard HomeFlex Older Persons Program.
Columbia Senior Residences at Edgewood	135	Leased	No	PBV unit creation under AH's Standard HomeFlex Older Persons Program.
Columbia Senior Residences at Martin Luther King, Jr.	122	Leased	No	PBV unit creation under AH's Standard HomeFlex Older Persons Program.
Columbia Senior Residences at Mechanicsville	81	Leased	No	PBV unit creation under AH's HomeFlex for Older Persons Program.
Columbia South River Gardens	51	Leased	No	PBV unit creation under AH's Standard HomeFlex Program.
Columbia Sylvan Hills	37	Leased	No	PBV unit creation under AH's Standard HomeFlex Program.
Columbia Sylvan Hills	39	Leased	No	PBV unit creation under AH's HomeFlex Supportive Housing Program (HAVEN).
Columbia Tower at Martin Luther King, Jr. Village	56	Leased	No	PBV unit creation under AH's Standard HomeFlex Program.
Columbia Tower at Martin Luther King, Jr. Village	39	Leased	No	PBV unit creation under AH's HomeFlex Supportive Housing Program (HAVEN).
Constitution Avenue Apartments	67	Leased	No	PBV unit creation under AH's Standard HomeFlex Program.

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	PLANNED STATUS AT END OF PLAN YEAR*	RAD?	DESCRIPTION OF PROJECT
Covenant House Georgia	30	Leased	No	PBV unit creation under AH's HomeFlex Supportive Housing Program (HAVEN).
Dwell at Alcove	9	Leased	No	PBV unit creation under AH's HomeFlex Supportive Housing Program (HAVEN).
Gateway at Capitol View	162	Leased	No	PBV unit creation under AH's Standard HomeFlex Older Persons Program.
Gateway at East Point	100	Leased	No	PBV unit creation under AH's Standard HomeFlex Program.
GE Tower	189	Leased	No	PBV unit creation under AH's Standard HomeFlex Program.
Heritage Green	44	Leased	No	PBV unit creation under AH's Standard HomeFlex Program.
Heritage Station I	88	Leased	No	PBV unit creation under AH's Standard HomeFlex Program.
Heritage Station II	150	Leased	No	PBV unit creation under AH's Standard HomeFlex Program.
Herndon Square Senior	97	Leased	No	PBV unit creation under AH's Standard HomeFlex Older Persons Program.
Imperial Hotel	90	Leased	No	PBV unit creation under AH's HomeFlex Supportive Housing Program (HAVEN)
Lakewood at Christian Manor	199	Leased	No	PBV unit creation under AH's Standard HomeFlex Program.
Legacy at Vine City	105	Leased	No	PBV unit creation under AH's Standard HomeFlex Program.
Lillie R. Campbell House	66	Leased	No	PBV unit creation under AH's Standard HomeFlex Program.
London Townhomes	138	Leased	No	PBV unit creation under AH's Standard HomeFlex Program.
Manor at Indian Creek II	75	Leased	No	PBV unit creation under AH's Standard HomeFlex Older Persons Program.
Manor at Scott's Crossing	100	Leased	No	PBV unit creation under AH's Standard HomeFlex Older Persons Program.
Martin House at Adamsville	114	Leased	No	PBV unit creation under AH's Standard HomeFlex Program.
Mechanicsville Crossing	30	Leased	No	PBV unit creation under AH's Standard HomeFlex Program.
Mechanicsville Station	35	Leased	No	PBV unit creation under AH's Standard HomeFlex Program.
Oasis at Scholars Landing	60	Leased	No	PBV unit creation under AH's Standard HomeFlex Older Persons Program.
Odyssey at Villas	32	Leased	No	PBV unit creation under AH's HomeFlex Supportive Housing Program (HAVEN).
O'Hern House	76	Leased	No	PBV unit creation under AH's HomeFlex Supportive Housing Program (HAVEN).



PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	PLANNED STATUS AT END OF PLAN YEAR*	RAD?	DESCRIPTION OF PROJECT
Park Commons / Gates Park HFOP	130	Leased	No	PBV unit creation under AH's Standard HomeFlex Older Persons Program.
Park Commons / Gates Park HFOP	22	Leased	No	PBV unit creation under AH's HomeFlex Supportive Housing Program (HAVEN).
Park Commons / Gates Park HFS	110	Leased	No	PBV unit creation under AH's Standard HomeFlex Program.
Park Commons / Gates Park HFS	19	Leased	No	PBV unit creation under AH's HomeFlex Supportive Housing Program (HAVEN).
Peaks at MLK	73	Leased	No	PBV unit creation under AH's Standard HomeFlex Program.
Phoenix House	44	Leased	No	PBV unit creation under AH's HomeFlex Supportive Housing Program (HAVEN).
Providence Parkway Village	50	Leased	No	PBV unit creation under AH's Standard HomeFlex Program.
Quest Village III	10	Leased	No	PBV unit creation under AH's HomeFlex Supportive Housing Program (HAVEN).
Retreat at Edgewood	40	Leased	No	PBV unit creation under AH's Standard HomeFlex Program
Reynoldstown Senior Residences	26	Leased	No	PBV unit creation under AH's Standard HomeFlex Older Persons Program.
Seven Courts	30	Leased	No	PBV unit creation under AH's HomeFlex Supportive Housing Program (HAVEN).
Spring View Apartments	24	Leased	No	PBV unit creation under AH's Standard HomeFlex Program.
Sterling at Candler Village	170	Leased	No	PBV unit creation under AH's Standard HomeFlex Program.
Summerdale Commons	50	Leased	No	PBV unit creation under AH's Standard HomeFlex Program.
Summit Trail	40	Leased	No	PBV unit creation under AH's HomeFlex Supportive Housing Program (HAVEN).
The Legacy at Walton Lakes	24	Leased	No	PBV unit creation under AH's Standard HomeFlex Program.
The Remington Apartments	160	Leased	No	PBV unit creation under AH's Standard HomeFlex Program.
The Renaissance at Park South – Senior	100	Leased	No	PBV unit creation under AH's Standard HomeFlex Older Persons Program.
Veranda at Auburn Pointe	86	Leased	No	PBV unit creation under AH's Standard HomeFlex Program.
Veranda at Auburn Pointe II	98	Leased	No	PBV unit creation under AH's Standard HomeFlex Program.
Veranda at Auburn Pointe III	102	Leased	No	PBV unit creation under AH's Standard HomeFlex Program.
Veranda at Carver	90	Leased	No	PBV unit creation under AH's Standard HomeFlex Program.

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	PLANNED STATUS AT END OF PLAN YEAR*	RAD?	DESCRIPTION OF PROJECT
Veranda at CollegeTown	100	Leased	No	PBV unit creation under AH's Standard HomeFlex Program.
Veranda at Groveway	74	Leased	No	PBV unit creation under AH's Standard HomeFlex Program.
Veranda at Scholars Landing	100	Leased	No	PBV unit creation under AH's Standard HomeFlex Program.
Welcome House	41	Leased	No	PBV unit creation under AH's HomeFlex Supportive Housing Program (HAVEN).
Woodbridge at Parkway Village	98	Leased	No	PBV unit creation under AH's Standard HomeFlex Program.
<b>Non-RAD Total:</b> Planned Existing Project-Based Vouchers	<b>6,541</b>			

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	PLANNED STATUS AT END OF PLAN YEAR*	RAD?	DESCRIPTION OF PROJECT
Barge Road	129	Leased	Yes	PH unit conversion in AH-Owned Community to PBV units under RAD Program.
Columbia Commons	48	Leased	Yes	PH units in Mixed Community to PBV units under RAD Program.
Columbia Creste	61	Leased	Yes	PH units in Mixed Community to PBV units under RAD Program.
Columbia Estates	50	Leased	Yes	PH units in Mixed Community to PBV units under RAD Program.
Columbia Grove	56	Leased	Yes	PH units in Mixed Community to PBV units under RAD Program.
Columbia Mechanicsville Apartments	62	Leased	Yes	PH units in Mixed Community to PBV units under RAD Program.
Columbia Mechanicsville Crossing	68	Leased	Yes	PBV unit creation under AH's Standard HomeFlex Program.
Columbia Mechanicsville Parkside	47	Leased	Yes	PH units in Mixed Community to PBV units under RAD Program.
Columbia Mechanicsville Station	63	Leased	Yes	PBV unit creation under AH's Standard HomeFlex Program.
Columbia Park Citi Residences at West Highlands	61	Leased	Yes	PH units in Mixed Community to PBV units under RAD Program.

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	PLANNED STATUS AT END OF PLAN YEAR*	RAD?	DESCRIPTION OF PROJECT
Columbia Senior Residences at Mechanicsville	54	Leased	Yes	PH units in Mixed Community to PBV units under RAD Program.
Columbia Village	30	Leased	Yes	PH units in Mixed Community to PBV units under RAD Program.
East Lake Highrise	149	Committed	Yes	PH units in Mixed Community to PBV units under RAD Program.
James Allen, Jr. Place (f.k.a. Hightower Manor)	129	Committed	Yes	PH unit conversion in AH-Owned Community to PBV units under RAD Program.
Marietta Road Senior Tower	129	Leased	Yes	PH unit conversion in AH-Owned Community to PBV units under RAD Program.
Peachtree Road Senior Tower	196	Leased	Yes	PH unit conversion in AH-Owned Community to PBV units under RAD Program.
Piedmont Road Highrise	207	Leased	Yes	PH unit conversion in AH-Owned Community to PBV units under RAD Program.
Tenth & Juniper Highrise	149	Leased	Yes	PH unit conversion in AH-Owned Community to PBV units under RAD Program.
Village at Carver (Phase I)	110	Leased	Yes	PH units converted to PBV units under the RAD Section 18.
Villages at Castleberry Hill I	66	Leased	Yes	PH unit conversion in Mixed Community to PBV units under RAD Program.
Villages at Castleberry Hill II	114	Leased	Yes	PH unit conversion in Mixed Community to PBV units under RAD Program.
Villages at East Lake Redevelopment I & II	271	Leased	Yes	PH unit conversion in Mixed Community to PBV units under RAD Program.
<b>RAD Total:</b> Planned Existing Project-Based Vouchers	<b>2,249</b>			
<b>All PBV Total:</b> Planned Existing Project-Based Vouchers	<b>8,790</b>			

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

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

PLANNED OTHER CHANGES TO MTW HOUSING STOCK ANTICIPATED IN THE PLAN YEAR
AH plans to continue holding units off-line as a viable strategy to house program participants affected by AH's substantial rehabilitation and significant modernization efforts directly associated with its conversion plans and the requirements of the Rental Assistance Demonstration (RAD) Program.

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

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

**GENERAL DESCRIPTION OF ALL PLANNED CAPITAL EXPENDITURES DURING THE PLAN YEAR**

AH plans to expend approximately \$6.45M for site and building improvements at five AH-Owned communities. Planned expenditures include replacing 346 exterior light fixtures, demolition/replacement of 282 balconies, 20 PTAC units, replace 4 dumpsters, 2 trash compactors, 20 toilet tank upgrades, 25 refrigerators, and 25 stoves.

Planned large scale expenditures projects including previously mentioned balcony repairs, also total window replacement for energy efficiency, elevator upgrades, interior stairwell painting, interior lighting upgrades, upgrade 100 community room chairs, replace 10 exterior doors, replace laundry room flooring, upgrade lighting protection systems, upgrade security cameras.

In addition, planned capital expenditures for sitework includes roof replacement, exterior signage, exterior lighting upgrades, patio redesign and sitework, doggie park fencing and amenities, bio retention upgrades, seal, stripe parking lots, irrigation system, greenspace, landscape/hardscape, and driveway access.

As part of its planned capital expenditures during the Plan Year, AH may purchase fleet vehicles or invest in equipment to replace aging vehicles and equipment assigned to staff or designated for corporate use.

Other capital expenditures, such as buying furniture, fixtures, and other equipment, consistent with AH's established priorities, may also occur during the plan year. Listed below are the estimated capital expenditures per site:

- \$3,118,500 @ Cheshire Bridge Road Highrise
- \$1,488,940 @ Cosby Spear Highrise
- \$ 357,500 @ Georgia Avenue Highrise
- \$1,373,900 @ Marian Road Highrise
- \$ 114,400 @ Westminster
- \$6,453,240 Planned Capital Expenditure Total\*

**\*Note:** Estimated expenditures may increase due to materials, labor, or other construction and/or market increases.

## B. Leasing Information

### i. Planned Number of Households Served

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

PLANNED NUMBER OF HOUSEHOLDS SERVED THROUGH:	PLANNED NUMBER OF UNIT MONTHS OCCUPIED/LEASED*	PLANNED NUMBER OF HOUSEHOLD TO BE SERVED**
MTW Public Housing Units Leased	19,584	1,632
MTW Housing Choice Vouchers (HCV) Utilized	243,576	20,298
Local, Non-Traditional: Tenant-Based <sup>^</sup>	3,540	295
Local, Non-Traditional: Property-Based <sup>^</sup>	31,368	2,614
Local, Non-Traditional: Homeownership <sup>^</sup>	23,496	1,958
<b>Planned Total Households Served:</b>	<b>321,564</b>	<b>26,797</b>

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

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

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

LOCAL, NON-TRADITIONAL CATEGORY	MTW ACTIVITY NAME/NUMBER	PLANNED NUMBER OF UNIT MONTHS OCCUPIED/LEASED*	PLANNED NUMBER OF HOUSEHOLDS TO BE SERVED*
<b>Tenant-Based</b>	Developing Alternative and Supportive Housing Resources/SH.2005.09	3,540	295
<b>Property-Based</b>	Gap Financing/RE.2005.11	13,584	1,132
<b>Property-Based</b>	HomeFlex Site-Based Administration/RE.2006.02	17,784	1,482
<b>Homeownership</b>	Comprehensive Homeownership Program/RE.2007.03	23,496	1,958

\* The sum of the figures provided should match the totals provided for each local, non-traditional categories in the previous table. Figures should be given by individual activity. Multiple entries may be made for each category if applicable.

Note: AH's Comprehensive Homeownership Program provides eligible, first-time homebuyers with down payment assistance (DPA) to make homeownership attainable for low-income families. AH's DPA is a subordinate lien on the property that AH records in the county public records. The loan is forgivable at maturity and AH will reconcile mature or paid off loans to record a "cancellation of lien" in the public records. This action will reduce AH's overall DPA roll and affect AH's household served numbers. AH will reflect changes in its MTW Annual Report as confirmation of reconciled maturity dates and lien releases become recorded.

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

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

<b>HOUSING PROGRAM</b>	<b>DESCRIPTION OF ANTICIPATED LEASING ISSUES AND POSSIBLE SOLUTIONS</b>
<b>MTW Public Housing</b>	AH will continue moratoriums on leasing activities at AH-Owned communities to “checkerboard” occupied units to complete planned rehabilitation projects. Leasing issue solutions include a deliberate approach in property management activities for AH contracted property managers as AH moves through the fiscal year. AH may also continue to deploy by-appointment, remote, and virtual strategies as solutions to leasing challenges.
<b>MTW Housing Choice Voucher</b>	AH will continue efforts to recruit and retain landlords, especially those with one- and two-bedroom units. As a solution, AH will take a deliberate and purposeful approach in voucher management activities while working with its property owner/manager partners and may continue to deploy revised payment standards and incentive strategies as solutions to leasing and inspection challenges.
<b>Local, Non-Traditional</b>	AH will continue efforts to recruit and retain property owner partners willing to provide temporary and permanent supportive housing for an at-risk segment of the population. AH’s short-term and long-term solutions include “fast-tracking,” temporary suspensions, or delayed responses to helping these families until more housing partners are recruited and/or planned development projects are closer to completion.



## C. Waiting List Information

### i. Waiting List Information Anticipated

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

WAITING LIST NAME	DESCRIPTION	NUMBER OF HOUSEHOLDS ON WAITING LIST	WAITING LIST OPEN, PARTIALLY OPEN OR CLOSED	WAS THE WAITING LIST OPENED DURING THE PLAN YEAR
MTW Housing Choice Voucher Program	Community-wide voucher WL for all populations.	23,335	Closed	No
Choice Mobility Vouchers (RAD PBV Program)	Specific voucher WL for eligible residents living at converted PH sites.	0	Partially Open	Yes
MTW Public Housing Program	Community-wide unit WL for all populations managed by a third party at the property level for 1,073 units at 7 AH-Owned sites.	1,315	Partially Open	Yes
Site-Based Administration – HomeFlex and Mixed-Communities	Community-wide unit WL for all population managed by property owners at the property level for 2,879 units at 38 sites.	13,003	Open	Yes
Site-Based Administration – HomeFlex and Mixed-Communities	Community-wide unit WL for all population managed by property owners at the property level for nearly 6,843 units at 71 sites.	33,507	Closed	No

#### Please describe any duplication of applicants across waiting lists:

AH does not discourage families from applying to multiple sites. Therefore, there may be situations in which families appear on multiple waitlists. For example, a family may appear on the MTW HCV waitlist as well as site-based waitlists managed by property owners or property management agents. AH, however, does monitor subsidy assistance to avoid and correct duplicative subsidy issuances. In the meantime, AH employs a date and time stamp process to receive applications and then administers a “lottery” that randomly selects families. AH’s local residency/employment preference ensures local families are issued an AH voucher before non-Atlanta residents or residents not employed within the City of Atlanta.

**ii. Planned Changes to Waiting List in the Plan Year**

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

WAITING LIST NAME	DESCRIPTION OF PLANNED CHANGES TO WAITING LIST
MTW Housing Choice Voucher	AH does not plan to make any changes to the waiting list.
Choice Mobility Voucher (RAD Project-Based Vouchers)	AH does not plan to make any changes to the waiting list.
Site-Based – Assorted Properties	AH contracts property managers that maintain waiting lists at the property level. No changes are planned.

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## III. PROPOSED MTW ACTIVITIES: HUD Approval Requested

### A. Activity Description

#### i. Describe the Proposed Activity

AH introduces **AW.2023.01 - Eliminate/Reduce Interim Examinations** to limit family-initiated interims to one interim request per recertification period and prohibit interim examination requests 90 days before and 90 days after the family's effective date.

#### ii. Describe How the Proposed Activity will Achieve One of More of the Three Statutory Objectives and the Specific Impacts on the Statutory Objective(s)

AH oversees an Annual Contributions Contracts (ACCs) - Housing Choice Vouchers (HCVs) and Public Housing (PH) of almost 23,000 units in which AH conducts various eligibility examinations during the fiscal year to admit, continue, or end program participation for AH-assisted households. On average, AH conducts about 3,000 new admission examinations, more than 21,000 annual examinations, and almost 13,000 interim examinations annually<sup>21</sup>. AH conducts approximately 140 examinations each day between the three examination types<sup>22</sup>. Of the total examinations, more than one-third (35%) are interim exams.

Currently AH's policy allows assisted households to request multiple interim examinations during the recertification period. This policy increases the workload and contributes to households "gaming" the process to reduce their rent share or increase their voucher size. Because of its policy, AH staff and its housing partners spend an inordinate amount of time conducting eligibility reviews, calculations, and other administrative tasks that take time away from processing intake, portability, and end-of-program files.

By eliminating or reducing the number family-initiated interim requests and prohibiting family initiated interim requests 90 days before and 90 days after their effective date, AH reduces duplicative workloads, which increases productivity hours for AH staff and its housing partners to **achieve MTW Statutory Objective: Cost Efficiency**.

In addition, AH discontinues income interim certifications for the addition/deletion of new family members in accordance with **Notice PIH 2016-05 (HA) Attachment N: Family Income and Composition: Regular and Interim Examinations**. AH acknowledges that hardships befall all household types from time-to-time. Therefore, AH will continue to review properly submitted hardship requests on a case-by-case basis in accordance with its Hardship Policy.

#### iii. Provide the Anticipated Schedule for Implementing the Proposed Activity

AH anticipates the following implementation schedule:

- February 5, 2023 – June 30, 2023 – **Notify program participants** via public meetings (AH's Stakeholders Briefings), MTW Public Hearing, AH's social media platforms, email blasts, new resident screenings and orientation, annual examinations, and any other opportunities of contact.
- July 1, 2023 – **Implement AW.2023.01 – Eliminate/Reduce Interim Examinations**; inform new admissions of interim request cap and provide interim reminder to existing program participants at the time of request or during their annual recertification exam.

<sup>21</sup> Period: FY 2018 – FY 2022 (July 1, 2017 – June 30, 2022). Recertification examinations ensure continued eligibility of household.

<sup>22</sup> Based on 261 workdays: July 1 through June 30 each fiscal year. Excludes other examination types such as ports, EOPs, etc.

## B. Activity Metrics Information

### i. Provide the Metrics from the “Standard HUD Metrics” Section that are Applicable to the Proposed Activity

The following “Standard HUD Metrics” are applicable to this activity:

- Cost Efficiency #2: Staff Time Savings

### ii. Give the Baseline Performance Level for each Metric (a numeric value) Prior to Implementation of the Proposed Activity

<i>CE #2: Staff Time Savings - Eliminate/Reduce Interim Examinations</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	Total amount of staff time dedicated to the task prior to implementation of the activity (in hours).	Expected amount of total staff time dedicated to the task after implementation of the activity (in hours).	Actual amount of total staff time dedicated to the task after implementation of the activity (in hours).	Whether the outcome meets or exceeds the benchmark.
Total time to complete the task in staff hours (decrease).	Total amount of staff time dedicated to the task <b>prior to implementation</b> of the activity.	Expected total amount of staff time dedicated to the task <b>after implementation</b> of the activity.	Actual total amount of staff time dedicated to the task <b>after implementation</b> of the activity.	N/A
	25,436	22,892	TBD	
	Hours of Staff Time	Hours of Staff Time	Hours of Staff Time	

### iii. Give the Annual Benchmark for each Metric (a numeric value)

<i>Annual Benchmark - Elimination of Interim Certifications</i>						
Standard Metric	Baseline	FY 2024	FY 2025	FY 2026	FY 2027	FY 2028
Total time to complete the task in staff hours (decrease).	25,436 hours	22,892 hours	20,603 hours	18,543 hours	16,688 hours	15,019 hours

### iv. If Applicable, Give the Overall and/or Long-Term Benchmark(s) for each Metric (a numeric value)

N/A

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

AH will compile activity metric data from proprietary software, internally maintained databases, and similar data collecting sources.

## C. Cost Implications

### i. **State Whether the Proposed Activity will Result in any Cost Implications** (positive or negative) **for the MTW PHA**

Implementation of this activity does not cause AH to increase or decrease its workforce, payroll, information security, cash management controls nor similar direct/indirect cost implications. Therefore, AH does not anticipate any cost implications (positive or negative) resulting from implementation of this activity.

### ii. **If the Proposed Activity does Result in Cost Implications, Provide an Estimate of the Amount and Discuss how the MTW PHA will Manage the Surplus or Deficit Anticipated**

N/A

## D. Need/Justification for MTW Flexibility

### i. **Cite the Authorization(s) Detailed in Attachment C and/or D of the Standard MTW Agreement** (or applicable successor section in future iterations of the MTW Agreement) **that gives the MTW PHA Flexibility to Conduct the Proposed Activity**

Pursuant to AH's Amended and Restated MTW Agreement, Legacy Attachment D, Section II, AH is authorized to restructure the annual and interim review process in AH's Section 8 project-based rental assistance housing program, AH's Section 8 tenant-based rental assistance program, any MTW-funded AH homeownership program, and AH's public housing assisted units program (conventional and AH-assisted units in mixed-income, mixed-finance communities) and provide for exceptions (e.g., occupancy requirements or hardship) in order to affect the number or reviews a participant receives in any calendar year.

### ii. **Explain Why the Cited Authorization(s) is needed to Engage in the Proposed Activity**

AH desires to reduce the administrative burden and duplicative workload associated with conducting multiple examinations during the course a review period by limiting family initiated interim requests and prohibiting such request 90 days before and after a family's effective date. Therefore, AH deploys the cited authorization to modify HUD regulation 24 CFR § 960.257 Family Income and Composition: Annual and Interim Reexaminations and 24 CFR §982.516 Family Income and Composition: Annual and Interim Examinations to affect the frequency of reviews across all assistance programs that differ from the requirements currently mandated in the US Housing Act of 1937 (1937 Act) and/or as amended or succeeded.

## E. Rent Reform/Term Limit Information (if applicable)

This activity does not alter the amount a household contributes towards their housing cost and does not change how rent/tenant share is calculated for any households participating in AH's assistance programs. Therefore, this element is not applicable to this proposed MTW Activity.

### i. **Impact Analysis**

### ii. **Hardship Case Criteria**

### iii. **Description of the Annual Reevaluation**

### iv. **Transition Period**



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## IV. APPROVED MTW ACTIVITIES: HUD Approval Previously Granted

### A. Implemented Activities

AH's MTW Activities				
Activity ID		Activity Name	Page	MTW Authorization(s) AH's Attachment D
AW	2005.01	\$125 Minimum Rent	51	Section I.O: General Conditions; setting rents and term limits
AW	2005.02	Earned Income Disregard	52	Sections I.O: General Conditions. AH may adopt and implement any reasonable policies for setting rents, subsidy levels, and term limits for rental assistance programs.
AW	2005.03	Work / Program Requirement	53	Section I.O: General Conditions Section IV: Self-Sufficiency/Supportive Services
HC	2005.04	Enhanced Inspection Standards	54	Section VII: Establishment of HCV Program
HD	2005.06	Good Neighbor Program II	54	Section IV: Self-Sufficiency/Supportive Services Section V: Single-Fund Budget with Full Flexibility
HD	2005.06	Human Development Services	55	Section IV: Self-Sufficiency/Supportive Services Section V: Single-Fund Budget with Full Flexibility
PH	2005.07	4-to-1 Elderly Admissions	56	Section III: Occupancy Policies Section IV: Self-Sufficiency/Supportive Services
SH	2005.09	Developing Alternate and Supportive Housing Resources	56	Section V: Single-Fund Budget with Full Flexibility Section VII.B: Simplification of the Process to Project-Base Section 8 Vouchers Section VII.C: Simplification of the Development and Redevelopment Process
RE	2005.10	Revitalization Program	57	Section V: Single-Fund Budget with Full Flexibility Section VII.B: Simplification of the Process to Project-Base Section 8 Vouchers Section VII.C: Simplification of the Development and Redevelopment Process
RE	2005.11	Gap Financing	57	Second Amendment, Section 2: Use of MTW Funds Second Amendment, Section 3: Reinstatement of "Use of MTW Funds" Implementation Protocol

AH's MTW Activities				
Activity ID		Activity Name	Page	MTW Authorization(s) AH's Attachment D
HC	2006.01	AH Submarket Payment Standards	58	Section VII: Establishment of HCV Program
RE	2006.02	HomeFlex Site-Based Onsite Administration	59	Section V: Single-Fund Budget with Full Flexibility Section VII.B: Simplification of the Process to Project-Base Section 8 Vouchers Section VII.C: Simplification of the Development and Redevelopment Process
HC	2007.01	Re-Engineering the Housing Choice Voucher Program	60	Section V: Single-Fund Budget with Full Flexibility Section VII: Establishment of HCV Program Section VII.B: Simplification of the Process to Project-Base Section 8 Vouchers Section VII.C: Simplification of the Development and Redevelopment Process
RE	2007.03	Comprehensive Homeownership Program	61	Section V: Single-Fund Budget with Full Flexibility
RE	2007.04	HomeFlex as a Strategic Tool	62	Section V: Single-Fund Budget with Full Flexibility Section VII.B: Simplification of the Process to Project-Base Section 8 Vouchers Section VII.C: Simplification of the Development and Redevelopment Process
AW	2008.01	Rent Simplification / AH Standard Deductions	63	Section I.O: General Conditions
HC	2008.02	Leasing Incentive Fee	63	Section VII: Establishment of HCV Program
PH	2008.03	Energy Performance Contracting	64	Section IX: Energy Performance Contracting

## AW.2005.01 - \$125 MINIMUM RENT

### **i. Plan Year Approved, Implemented, Amended**

Activity approved and implemented in FY 2005. Activity not amended since implementation.

### **ii. Description/Update**

In response to budget constraints and identifying opportunities for program participants to contribute toward sustaining subsidized housing assistance and paying their “fair share,” AH utilized MTW Authorizations Section I.O under Attachment D of its Amended and Restated MTW Agreement to increase the minimum rent to \$125 per month.

The rent increase was effective October 1, 2004 (FY 2005) and applicable to all rental assistance programs. Exempt households, defined as all members of the household that meet the definition of elderly or disabled and have a fixed, stable income source, such as Social Security, Social Security Disability Insurance (SSDI/SSI), employment pension, Veterans Affairs Benefits, or similar fixed income source(s). Rent calculations exclude annual income identified under 24 CFR § 5.609(c), such as income by minors, lump sum additions, special military pay, temporary, non-recurring or sporadic income, and other income types. Households meeting exclusionary definitions are exempt from the application of the minimum rent and continue to pay income-based rent or 30% of their adjusted gross income.

AH’s housing policies extend to all properties under AH’s portfolio, including public housing, Mixed (mixed-finance, mixed-income), and HomeFlex rental communities achieved through public-private partnerships, managed by professional property management agents. Management agents at those sites are responsible for implementing AH housing policies at their respective properties. AH conducts periodic site visits and consultations with management representatives, as well as requests and reviews management reports for compliance while offering training opportunities with respect to property operations, compliance, and financial oversight.

### **iii. Planned Non-Significant Changes**

AH does not plan any non-significant changes to this activity during the plan year.

### **iv. Planned Changes to Metrics/Data Collection**

AH does not plan any changes to Metrics/Data Collection to this activity during the plan year.

### **v. Planned Significant Changes**

AH does not plan any significant changes to this activity during the plan year.

## AW.2005.02 – EARNED INCOME DISREGARD

### **i. Plan Year Approved, Implemented, Amended**

Activity approved and implemented in FY 2005. Activity not amended since implementation.

### **ii. Description/Update**

AH introduced this activity to encourage older person households to maintain engagement in their community, increase self-sufficiency levels of program participants on fixed, stable sources of income, and improve the quality of life of its program participants. Therefore, AH utilizes MTW Authorizations Section I.G and I.O: General Conditions under Attachment D of its Amended and Restated MTW Agreement to disregard earned income from employment earned by elderly persons or disabled persons.

Incentivizing older persons whose primary source of income meets the definition of fixed, stable income to return to the workforce accomplishes the priorities of this activity. Fixed, stable income includes income from a verifiable plan such as Social Security, Social Security Disability Insurance (SSDI/SSI), employment pension, Veterans Affairs (VA) Benefits and similar fixed, stable income sources. Fixed income does not include incomes identified under 24 CFR § 5.609(c), such as income by minors, lump sum additions, special military pay, temporary, non-recurring or sporadic income, and other income types.

In instances where the Annual Fixed Income is not the primary source of income, AH, at its discretion, may establish a limit on the amount of disregarded earned income; therefore, earned income from employment not treated as disregarded income is include in the annual household income calculation for the Total Tenant Payment amount. In addition, this activity complements AH's Aging Well strategy.

### **iii. Planned Non-Significant Changes**

AH does not plan any non-significant changes to this activity during the plan year.

### **iv. Planned Changes to Metrics/Data Collection**

AH does not plan any changes to Metrics/Data Collection to this activity during the plan year.

### **v. Planned Significant Changes**

AH does not plan any significant changes to this activity during the plan year.

## **AW.2005.03 – WORK/PROGRAM REQUIREMENT**

### **i. Plan Year Approved, Implemented, Amended**

Activity approved and implemented in FY 2005. Activity not amended since implementation.

### **ii. Description/Update**

AH believes that the primary paths to self-sufficiency are work and education – a perspective supported by evidence-based studies. As such, and in line with AH's goal of positioning families for success, AH designed a work/program requirement by utilizing MTW Authorizations Section I.H: General Conditions and Section IV: Self-Sufficiency/Supportive Services under Attachment D of its Amended and Restated MTW Agreement.

Under this activity, AH requires program participants to contribute towards their housing by being actively engaged in education or employment activities. Therefore, work-abled Head of Household (HoH) program participants (ages 18-61) and other adult household members are required to maintain continuous employment and minor household members must maintain fulltime enrollment in primary, secondary, or post-secondary school. Minors not meeting the school enrollment requirement must meet the full-time employment requirement as a condition of the HoH to continue receiving rental assistance. Individuals who meet the workable definition by age but are unable to meet the education or employment requirement because of a disability, must submit relevant documentation.

AH may grant rent relief for program participants for employment terminations beyond the participant's control; otherwise, participants have 60 days to comply with the requirement unless an exemption applies. AH refers non-compliant public housing and housing choice voucher households to community resources that link education, employment, training, and related services to help individuals become and remain compliant with AH's requirement.

In general terms, AH realizes that a sizable number of program participants work in the service industry – food service, hospitality, personal care, retail, and similar typed jobs. These jobs usually base staffing on algorithms that factor in prior year data and season, and the employer uses this data to plan current year schedules. Realizing this employment practice, AH aligned the required hours of employment to emulate scheduling practices of many employers by modifying its work requirement from 30 hours per week to an average of 20 hours per week. AH, will continue to monitor employment practice and compliant families and adjust the requirement over time as appropriate.

### **iii. Planned Non-Significant Changes**

AH does not plan any non-significant changes to this activity during the plan year.

### **iv. Planned Changes to Metrics/Data Collection**

AH does not plan any changes to Metrics/Data Collection to this activity during the plan year.

### **v. Planned Significant Changes**

AH does not plan any significant changes to this activity during the plan year.

## AW.2005.04 – ENHANCED INSPECTION STANDARDS

### **i. Plan Year Approved, Implemented, Amended**

Activity approved and implemented in FY 2005. Activity not amended since implementation.

### **ii. Description/Update**

In response to AH's competitive service area, AH regularly reviews inspection processes and procedures to improve the delivery of affordable housing to all program participants. AH utilized MTW Authorizations Section VII: Establishment of Housing Choice Voucher Program under Attachment D of its Amended and Restated MTW Agreement to implement a more aggressive enforcement of higher standards to achieve higher health and safety standards for both housing partners and program participants to receive and maintain rental assistance.

A portion of AH's efforts focuses on considering updated materials and building codes while another portion focuses on aligning standards and timeline expectations that emulate industry best practices and, as appropriate, private rental market practices to reduce administrative burdens. These cited efforts enhance property eligibility criteria for single family, 2 to 4 unit multifamily, and commercial units (5 units or larger) while eliminating the requirement for property owners to provide gas certifications at the initial inspection.

Other enhancements include pre-contract assessments, initial inspections for property inclusion onto the rental assistance program, annual property and unit inspections, special inspections related to health and safety issues as initiated by program participants, property owners/housing partners, or community neighbors, as well as quality control inspections. AH revised the Site and Vicinity standards from a 5-door radius (front-back-left-right) to a 1-door radius (left-right-rear-or immediately adjacent to the property). This standard clearly defines unit eligibility for both property owners/housing partners and program participants, as well as increases the housing stock in AH's tight and extremely competitive affordable rental market.

### **iii. Planned Non-Significant Changes**

AH does not plan any non-significant changes to this activity during the plan year.

### **iv. Planned Changes to Metrics/Data Collection**

AH does not plan any changes to Metrics/Data Collection to this activity during the plan year.

### **v. Planned Significant Changes**

AH does not plan any significant changes to this activity during the plan year.

## HC.2005.05 – GOOD NEIGHBOR PROGRAM II

### **i. Plan Year Approved, Implemented, Amended**

Activity approved and implemented in FY 2005. Activity not amended since implementation.

### **ii. Description/Update**

Because of AH's plans to create mixed-income properties that would require the relocation of existing residents to other communities, AH felt the need to design this activity to help prepare low-income families to succeed in low-poverty neighborhoods. AH utilizes MTW Authorizations Sections IV: Self-Sufficiency/Supportive Services and V: Single-Fund Budget with Full Flexibility under Attachment D of its Amended and Restated MTW Agreement to establish a referral-based program to educate and prepare affected participants. Program curriculum includes living outside of public housing in market rent, mixed-income, and privately owned housing communities.

Since the program's inception, the Good Neighbor Program (GNP) has evolved its curriculum to include training on the roles and responsibilities of being a good neighbor once families relocate to an amenity-rich neighborhood. The program also highlights three "real life" issues: 1) Conflict Resolution and Problem Solving, 2) Community Expectations, and 3) Placing a High Value on Lifelong Education.



Neighbors, property owners/managers, housing partners, and other community interest groups/individuals can refer AH-assisted families to GNP for training on tenant-landlord relationships, self-reliance and personal responsibility, civic responsibilities and engagement, obligations and responsibilities of assisted families and related topics in being a good neighbor. Further, GNP serves as a voluntary training program for youth and interested stakeholders. Referred families must complete this program for continued assistance and families that exceed the referral-threshold may lose their rental assistance.

**iii. Planned Non-Significant Changes**

AH does not plan any non-significant changes to this activity during the plan year.

**iv. Planned Changes to Metrics/Data Collection**

AH does not plan any changes to Metrics/Data Collection to this activity during the plan year.

**v. Planned Significant Changes**

AH does not plan any significant changes to this activity during the plan year.

**HD.2005.06 – HUMAN DEVELOPMENT SERVICES**

**i. Plan Year Approved, Implemented, Amended**

Activity approved and implemented in FY 2005. Activity not amended since implementation.

**ii. Description/Update**

AH continually searches for community resources to assist program participants. Along this vein, AH utilizes MTW Authorizations Sections IV: Self-Sufficiency/Supportive Services and V: Single-Fund Budget with Full Flexibility under Attachment D of its Amended and Restated MTW Agreement to leverage agency resources and require full participation of all AH-assisted families referred to Human Development Services (HDS).

Required participation of referred families maximizes outcomes to link self-sufficiency and supportive services programming to its program participants and since inception of this activity, AH expanded its service provider network to more than 125 organizations that address a broad spectrum of training and social services for work-able, senior, and disabled families.

Two Family Self-Sufficiency (FSS) Program Coordinators assigned to HDS assess the specific needs of the whole family in support of working-aged adults (ages 18-61) entering or returning to the workforce for the first time or after an extended period (6-months or longer) of unemployment.

**iii. Planned Non-Significant Changes**

AH does not plan any non-significant changes to this activity during the plan year.

**iv. Planned Changes to Metrics/Data Collection**

AH does not plan any changes to Metrics/Data Collection to this activity during the plan year.

**v. Planned Significant Changes**

AH does not plan any significant changes to this activity during the plan year.

## PH.2005.07 – 4-TO-1 ELDERLY ADMISSION

### **i. Plan Year Approved, Implemented, Amended**

Activity approved and implemented in FY 2005. Activity not amended since implementation.

### **ii. Description/Update**

The intent of this MTW Activity is to create an optimal mix of elderly (62+), near elderly (55-61), and non-elderly, disabled families in AH-Owned communities. Therefore, AH utilizes MTW Authorizations Sections III: Occupancy Policies and IV: Self-Sufficiency/Supportive Services and V: Single-Fund Budget with Full Flexibility under Attachment D of its Amended and Restated MTW Agreement to create an admission preference for older applicants.

Under this MTW Activity, management agents are required to admit four elderly or near elderly applicants before the community admits one non-elderly, disabled applicant from their respective site-based waiting list to create a healthy diverse population that helps to improve the quality of life for all residents. Moreover, because of the mix, it improves the complex social issues when mixing seniors with younger residents at AH-Owned communities. This preference also creates an assortment of services and resources that are accessible to all residents, regardless of age or ability, to engage in and improve the aging process.

### **iii. Planned Non-Significant Changes**

AH does not plan any non-significant changes to this activity during the plan year.

### **iv. Planned Changes to Metrics/Data Collection**

AH does not plan any changes to Metrics/Data Collection to this activity during the plan year.

### **v. Planned Significant Changes**

AH does not plan any significant changes to this activity during the plan year.

## SH.2005.09 – DEVELOPING ALTERNATE AND SUPPORTIVE HOUSING

### **i. Plan Year Approved, Implemented, Amended**

Activity approved and implemented in FY 2005.

### **ii. Description/Update**

Originally, this activity supported AH allocating vouchers that assist supportive housing communities and worked to support new supportive housing developments for senior and disabled population groups. AH utilizes MTW Authorizations Sections V.A.2.f, Section VII.A, and Section VII.B.1-3 under Attachment D of its Amended and Restated MTW Agreement to earmark resources for alternative housing initiatives.

The intent of this activity continues to focus on targeting and assisting chronically homeless families, especially those with mental disabilities housed in AH-Owned communities that may lack the mental health supportive services on site to meet those residents' unique needs.

Although the last change in this activity merged Developing Alternative Housing Resources and Developing Supportive Housing into this current activity, the original concept and focus remains intact, which is homeless assistance programs and supportive services, non-targeted or mainstream programs. AH houses Home Again, its short-term housing assistance efforts, under this activity. AH designed Home Again to help families avoid homelessness or combat chronic or extended periods of homelessness by providing a short-term cash stipend.

### **iii. Planned Non-Significant Changes**

AH does not plan any non-significant changes to this activity during the plan year.

### **iv. Planned Changes to Metrics/Data Collection**

AH does not plan any changes to Metrics/Data Collection to this activity during the plan year.

### **v. Planned Significant Changes**

AH does not plan any significant changes to this activity during the plan year.

## RE.2005.10 – REVITALIZATION PROGRAM

### **i. Plan Year Approved, Implemented, Amended**

Activity approved and implemented in FY 2005. Activity not amended since implementation.

### **ii. Description/Update**

AH introduced this activity to reposition its public housing properties into economically sustainable sites and to revitalize amenity poor communities through investment to increase access to quality amenities. Therefore, AH utilizes MTW Authorizations Sections II.A.3 becoming a catalyst for community revitalization, V.A.2.b commercial facilities consistent with the objectives, and Attachment G – Good Cause Justification and other previously identified MTW Authorizations under Attachment D of its Amended and Restated MTW Agreement to explore and enter into agreements aligned with its neighborhood revitalization or affordable housing strategies.

Since this activity's implementation, AH's primary focus has been on repositioning its public housing portfolio and adding affordable units to the housing stock. Because of this intense focus, AH did not feature the revitalization component. However, innovative revitalization ideas and plans continued to generate for future consideration in commercial business ventures that support revitalization initiatives to stabilize local neighborhoods starving for reintegration into the surrounding community. Proposed ideas and plans include offering affordable housing units, retail and commercial ventures, great recreational facilities, and high performing schools to incorporate into AH's Revitalization Program, which may include AH-ownership of retail and commercial facilities to initiate revitalization.

### **iii. Planned Non-Significant Changes**

AH does not plan any non-significant changes to this activity during the plan year.

### **iv. Planned Changes to Metrics/Data Collection**

AH does not plan any changes to Metrics/Data Collection to this activity during the plan year.

### **v. Planned Significant Changes**

AH does not plan any significant changes to this activity during the plan year.

## RE.2005.11 – GAP FINANCING

### **i. Plan Year Approved, Implemented, Amended**

Activity approved and implemented in FY 2005. Activity not amended since implementation.

### **ii. Description/Update**

AH introduced this activity to facilitate financial closings in development projects associated with repositioning its public housing properties, which AH presumed to include funding other financial funding vehicles. As a result, AH utilizes MTW Authorizations Sections V.A.2 and V.A.2.b for all MTW eligible activities and all other previously identified MTW Authorizations under Attachment D of its Amended and Restated MTW Agreement to explore and apply gap financing strategies consistent with AH's Real Estate Development Strategy or AH's vision, mission, or current business model.

Real estate projects are about timing and location. Without the ability to fund projects or co-invest with partners leads to delays for real estate development deals and contributes to increased costs. These actions are contradictory to spending Federal dollars effectively and efficiently and prevent AH from increasing housing choices for low-income families.

Since this activity's implementation, AH's primary focus has been on repositioning its public housing portfolio and adding affordable units to the housing stock. Because of this intense focus, AH did not feature many the various financing components beyond facilitating financial closings. However, AH intends to issue construction loans, not to exceed 5-years to development partners as both a revenue stream to AH and to expedite the development of new affordable housing opportunities. As AH continues to acquire and revitalize communities in accordance with its vision,

mission, and current business model, such activities require access to short-term funding for the innovative revitalization ideas and plans to transform amenity-deficient communities into amenity-rich communities and first choice options, where families can live, work, and play.

**iii. Planned Non-Significant Changes**

AH may contribute funds toward non-AH subsidized units intended to serve households up to 80% area median income (AMI) to increase the total number of affordable units, while decreasing AH's long-term obligations.

**iv. Planned Changes to Metrics/Data Collection**

AH does not plan any changes to Metrics/Data Collection to this activity during the plan year.

**v. Planned Significant Changes**

AH does not plan any significant changes to this activity during the plan year.

## **HC.2006.01 – ATLANTA HOUSING SUBMARKET PAYMENT STANDARDS**

**i. Plan Year Approved, Implemented, Amended**

Activity approved and implemented in FY 2006. Activity amended in FY 2007, FY 2016, and FY 2022.

**ii. Description/Update**

AH utilizes MTW Authorizations Sections VII.A.14 and 19 and VII.B.4.6 under Attachment D of its Amended and Restated MTW Agreement to adjust and determine Fair Market Rents (FMRs) or structure such for Housing Choice Voucher assistance or initiatives.

Originally, AH identified seven submarkets within its service jurisdiction after consulting with an independent entity to develop its own Payment Standards. Beginning in 2007, AH implemented separate payment standard schedules for each identified submarket upon the establishment of new Housing Assistance Payment (HAP) contracts during the recertification period.

In FY 2022, AH updated its submarket payment standards based on market studies that expanded the schedules to 24 submarkets from the previous update conducted in FY 2016. The new payment standards and submarket additions were not as dramatic a change as was the change in FY 2016, which expanded the payment schedules from 7 in 2007 to 23 submarkets.

By aligning its payment standards with actual single-family residential rental costs at the census tract level, AH does not skew market rents for a neighborhood by the subsidy paid. In addition, the realignment of the rents allows AH better management of its subsidy allocation, which permits AH to provide more housing opportunities in low-poverty and less impacted areas.

**iii. Planned Non-Significant Changes**

AH does not plan any non-significant changes to this activity during the plan year.

**iv. Planned Changes to Metrics/Data Collection**

AH does not plan any changes to Metrics/Data Collection to this activity during the plan year.

**v. Planned Significant Changes**

AH does not plan any significant changes to this activity during the plan year.

## RE.2006.02 – HOMEFLEX SITE-BASED ON-SITE ADMINISTRATION

### **i. Plan Year Approved, Implemented, Amended**

Activity approved in FY 2006 and implemented in FY 2007. Activity not amended since implementation.

### **ii. Description/Update**

Originally, AH introduced this activity to eliminate duplicated administrative processes, eligibility determinations, and resident screening at AH's Project-Based Rental Assistance (rebranded as "HomeFlex") communities. By utilizing MTW Authorizations Sections V: Single-Fund Budget with Full Flexibility, VII.A: AH is Authorized to Create its own Housing Choice Voucher Program, VII.B: Simplification of the Process to Project-Base Section 8 Vouchers and VII.C: Demonstration Program on Project-Based Financing under Attachment D of its Amended and Restated MTW Agreement to streamline project-basing activities.

In addition, AH initially used this activity to launch a homeless demonstration program and a supportive housing program for persons with developmental disabilities and chronic mental illness at seven privately owned communities. By agreement, AH entered seven two-year renewable HomeFlex contracts with property owners, where the property owner engaged a third-party supportive service provider to provide ongoing supportive services for target participants for a minimum of two-years. Since then, agreement terms with private property owners have increased from two to 20 years. The owner entities and their professional management agents have full responsibility for performing all site-based administration tasks for the property, which is subject to AH inspections and reviews, and administrative and programmatic functions conducted in connection with admissions and occupancy procedures relating to HomeFlex assisted units.

The changes and updates make the HomeFlex Program more attractive to prospective housing partners and it increases the affordable housing stock and increases housing choices for the targeted population.

### **iii. Planned Non-Significant Changes**

AH does not plan any non-significant changes to this activity during the plan year.

### **iv. Planned Changes to Metrics/Data Collection**

AH does not plan any changes to Metrics/Data Collection to this activity during the plan year.

### **v. Planned Significant Changes**

AH does not plan any significant changes to this activity during the plan year.

## HC.2007.01 – RE-ENGINEERING THE HOUSING CHOICE VOUCHER PROGRAM

### **i. Plan Year Approved, Implemented, Amended**

Activity approved and implemented in FY 2007. Activity not amended since implementation.

### **ii. Description/Update**

AH introduced this activity to take advantage of cost efficiencies that effectively streamline AH's Housing Choice Voucher (HCV) Program processes. Therefore, AH utilizes MTW Authorization Section VII.A: Authorized to Create its own Housing Choice Voucher (HCV) Program under Attachment D of its Amended and Restated MTW Agreement to develop new policies and procedures in the administration of its HCV Program.

Originally, AH sought to move closer to a paperless, state-of-the-art, client-focused, self-servicing program, where the key areas focused on and continue to include Organizational Structure, Systems and Processes, Training and Capacity Building, Customer Service Delivery, and State-of-the-Art Technology. Since implementation of this activity, AH replaced paper files with electronic files and e-copied all permanent documents, created an online portal for property owners, and created a call center to improve customer service response times. Other re-engineering innovations implemented under this activity include measures designed to enhance and streamline core-business processes and related policies, procedures, and business documents.

AH reviews its core business processes and operating policies annually to keep them aligned with industry best practices and, as appropriate, to emulate them to private sector business practices. Through these reviews and alignments, AH can eliminate or reduce administrative steps that delay or elongate lease-ups, which burdens the process times while outlining family obligations for program participants. In FY 2016, AH created a Landlord Advisory Group to examine processes and procedures with the goal of ensuring that privately owned housing options remain available and affordable to low-income families.

### **iii. Planned Non-Significant Changes**

AH does not plan any non-significant changes to this activity during the plan year.

### **iv. Planned Changes to Metrics/Data Collection**

AH does not plan any changes to Metrics/Data Collection to this activity during the plan year.

### **v. Planned Significant Changes**

AH does not plan any significant changes to this activity during the plan year.



## RE.2007.03 – COMPREHENSIVE HOMEOWNERSHIP PROGRAM

### **i. Plan Year Approved, Implemented, Amended**

Activity approved and implemented in FY 2007. Activity not amended since implementation.

### **ii. Description/Update**

AH introduced this activity through utilization of MTW Authorization Section V.A: Single-Fund Budget with Full Flexibility under Attachment D of its Amended and Restated MTW Agreement to establish a Down Payment Assistance (DPA) Program to increase homeownership opportunities for low to moderate-income families. The activity also promotes homeownership opportunities in healthy, mixed-income communities through the provision of subordinated mortgage loans to qualified households that earn up to 80 percent of the area median income (AMI), are first-time homebuyers and purchase within the City of Atlanta. The subordinated mortgage loans are a one-time assistance product for a 10-year period, and forgivable at 20% annually (in years 6 through 10) AH may assist households greater than 80 percent of AMI, up to 115 percent of AMI by utilizing non-MTW funding sources. In these cases, assisting households greater than 80 percent AMI, AH will review various factors, such as HA priorities, household composition, and the availability of non-MTW funds before approving assistance for families greater than 80 percent of the AMI.

Originally, AH sponsored a conventional Housing Choice Voucher (HCV) Homeownership Program (circa 2002 – 2009) that provided mortgage payment assistance to qualified, AH-assisted program participants purchasing a home under the terms of the HCV Homeownership Program. Primarily because AH was unable to get solid lender participation in this program, AH suspended its HCV Homeownership Program. During the active period of AH's HCV Homeownership Program, AH assisted 88 voucher participants in becoming homeowners and continues to support the last families (14) matriculating through the HCV Homeownership Program under the original terms.

As developed, AH's DPA Homeownership Program assists more families. The program works with HUD-approved Home Buyer Education Counseling Providers to prepare low to moderate-income families in becoming successful and sustainable homeowners, maximizes the number of families AH can help by limiting the assistance to a one-time dollar amount that can combine with other down payment assistance programs. The latter feature really helps families defray the initial and overall costs of homeownership.

Under this activity, the DPA maximum eligible sales price is \$335,000, which aligns with the actual number of homes available to purchase in the city up to the higher price point (formerly \$275,000). AH continues to refer all prospective homebuyers to its DPA Program developed under this MTW Activity.

### **iii. Planned Non-Significant Changes**

AH will review DPA awards for maturity, payoff, and other statuses to file "cancelation of liens."

### **iv. Planned Changes to Metrics/Data Collection**

AH does not plan any changes to Metrics/Data Collection to this activity during the plan year.

### **v. Planned Significant Changes**

AH does not plan any significant changes to this activity during the plan year.



## RE.2007.04 – HOMEFLEX AS A STRATEGIC TOOL

### **i. Plan Year Approved, Implemented, Amended**

Activity approved and implemented in FY 2007. Activity not amended since implementation.

### **ii. Description/Update**

Several years ago, AH innovatively reserved a portion of its Housing Choice Voucher funds to project based them at properties that might otherwise not provide affordable units. Doing so has increased housing choices for low-income families. AH's program Project-Based Rental Assistance (PBRA) was an original concept and rebranded as HomeFlex in the last 5 years.

Nonetheless, AH utilizes MTW Authorizations Section V.A: Single-Fund Budget with Full Flexibility, Section VII.B: Simplification of the Process to Project-Base Section 8 assistance, Section VII.C: Demonstration Program on Project-Based Financing under Attachment D of its Amended and Restated MTW Agreement to design its HomeFlex Program through competitive and non-competitive processes.

Project-basing assistance at AH-Owned or privately owned properties continues to be an innovative idea that pays substantial dividends to AH, the property owner, and eligible families. Under the premise, AH provides a subsidy for the rental unit on behalf of the eligible family and property owners and accepts the subsidy payment for the unit pursuant to the HomeFlex Agreement. Further, the assistance remains with the project or unit for the next eligible family to use.

Through this activity, the project-basing theme remains intact, and AH can project base rental assistance at communities owned directly or indirectly by AH with or without competition. Therefore, AH may project base up to 100% assistance at communities owned by AH, which exceeds HUD project caps of 25% and 50% in the case of RAD and program cap limits, percent increase, project cap limits, and similar limitations outlined under the Housing Opportunities through Modernization Act (HOTMA). Further AH may exercise two options under HOTMA to bring units under HAP contract more quickly. These options include utilization of the non-life-threatening (NLT) provision and the Alternative Inspection provision. The NLT provision permits AH to approve tenancy of a unit when a unit fails HQS provided the unit only has NLT deficiencies. The Alternative Inspection provision allows AH to approve tenancy of a unit when a property, prior to HQS inspection, has passed an inspection in the past 24 months.

In addition, this activity permits AH to solicit private developers and owners interested in reserving a percentage of their multifamily rental units for eligible low-income families and accepting project-based assistance (subsidy) monthly in return and permits AH to receive and approve solicited and unsolicited proposals from developers and owners of multifamily rental properties outside of AH's service jurisdiction. Such examples AH may include negotiating intergovernmental agreements with PHAs, local government entities, or non-profit/for-profit organizations interested in reserving a percentage of their multifamily rental units in the Atlanta Metropolitan Statistical Area for eligible, low-income families.

### **iii. Planned Non-Significant Changes**

AH does not plan any non-significant changes to this activity during the plan year.

### **iv. Planned Changes to Metrics/Data Collection**

AH does not plan any changes to Metrics/Data Collection to this activity during the plan year.

### **v. Planned Significant Changes**

AH does not plan any significant changes to this activity during the plan year.

## AW.2008.01 – RENT SIMPLIFICATION / AH STANDARD DEDUCTIONS

### i. Plan Year Approved, Implemented, Amended

Activity approved and implemented in FY 2008. Activity not amended since implementation.

### ii. Description/Update

AH streamlines the rental calculation operations and increases calculation accuracy by utilizing MTW Authorizations Section I.G and I.H: General Conditions under Attachment D of its Amended and Restated MTW Agreement to simplify the rent calculation and standardized deductions for all rental assistance programs.

Originally, AH employed HUD standard deductions for dependent households, elderly, and disabled households. Through this activity, AH changes the deduction amount used to adjust household income in the rent calculation formula. The table below illustrates deduction changes at both HUD and AH levels:

Deduction Category	HUD Standard Deduction	AH Standard Deduction
Dependents	\$480	\$750
Elderly and/or Disabled	\$400	\$1,000

AH submits that its standard deduction amounts add value to the integrity, because they provide an equitable approach for all assisted families and reduces the ‘interrogation-like’ verification of unreimbursed out-of-pocket expenses. The standard deduction amounts also improve productivity because it eliminates the burden of “chasing” receipts and potentially performing multiple calculations once eligible households produce out-of-pocket expenses. Finally, the standard deductions improve the accuracy of the rental calculation process.

### iii. Planned Non-Significant Changes

AH does not plan any non-significant changes to this activity during the plan year.

### iv. Planned Changes to Metrics/Data Collection

AH does not plan any changes to Metrics/Data Collection to this activity during the plan year.

### v. Planned Significant Changes

AH does not plan any significant changes to this activity during the plan year.

## AW.2008.02 – LEASING INCENTIVE FEES

### i. Plan Year Approved, Implemented, Amended

Activity approved and implemented in FY 2008. Activity not amended since implementation.

### ii. Description/Update

Living within AH’s service area is an expensive proposition, even for those households with incomes 20 percent above the Area Median Income (AMI)<sup>23</sup>. With this knowledge and understanding that AH was planning long-term revitalization of its housing stock, AH sought to recruit property owners through incentives to lease their units to families affected by relocation efforts because of HUD-approved demolition of AH-Owned communities.

Since implementation, this activity has evolved to create a faster program move process. AH utilizes MTW Authorizations Section VII.A: Authorized to Create its Own HCV Program under Attachment D of its Amended and Restated MTW Agreement to provide leasing incentive fees (LIFs). In FY 2016, AH provided incentives for both prospective program participants and property owners to work together to find units and submit the Request for Tenancy (RTA) within 30 days of voucher issuance.

<sup>23</sup> Set by HUD annually.

The Leasing Incentive Fees serve to remove or reduce obstacles and barriers preventing low-income families from leasing quality housing in areas of opportunity. Overall, LIFs defray the cost of application fees, security deposits, and similar out-of-pocket expenses not readily accessible to voucher-holding families, especially first-time renters. Further, LIFs help to attract property owners with units in areas of opportunity, which increases both the affordable housing stock and number of housing partners accepting vouchers. Finally, AH offers LIFs to property owners with single-family homes to help increase the housing choices for voucher-holding families. Single-family property owners receive a New Contract Incentive or one-time unit incentive payment each time the single-family unit passes HQS Inspections on the initial visit and then subsequently leases that unit to a voucher-holding family under a new HAP Contract.

**iii. Planned Non-Significant Changes**

AH does not plan any non-significant changes to this activity during the plan year.

**iv. Planned Changes to Metrics/Data Collection**

AH does not plan any changes to Metrics/Data Collection to this activity during the plan year.

**v. Planned Significant Changes**

AH does not plan any significant changes to this activity during the plan year.

## **PH.2008.03 – ENERGY PERFORMANCE CONTRACTING**

**i. Plan Year Approved, Implemented, Amended**

Activity approved and implemented in FY 2008. Activity not amended since implementation.

**ii. Description/Update**

Under this activity, AH has leveraged a \$9.1 million Energy Performance Contracting (EPC) loan with MTW funds to modernize its communities by replacing older equipment, fixtures, and systems with newer, energy-efficient, earth craft equipment, fixtures, and systems to enhance the quality of living environments for public housing residents.

AH utilizes MTW Authorization Section IX: Energy Performance Contracting (EPC) under Attachment D of its Amended and Restated MTW Agreement to employ energy conservation and efficiency standards, practices, and improvements to its properties. Through this activity, AH works closely with Johnson Controls in administering its second EPC (FY 2011) to facilitate upgrades at its residential communities and pursue green initiatives with and without MTW funds. Examples include new heating ventilation and air conditioning (HVAC) systems, upgraded bathrooms with low-flow faucets, showers, and toilets, and modern light fixtures with compact florescent, LED, or other upgraded lighting sources.

These capital improvements complement and supplement the American Recovery and Reinvestment Act (ARRA) renovations begun in FY 2010 and AH will continue to implement energy conservation measures as necessary when recapitalizing AH-Owned properties converted to project-based voucher units under the Rental Assistance Demonstration (RAD) Program. Since implementation, the cost savings have been higher than projected and through utilization of this activity, AH retains up to 50 percent of the costs savings under the EPC, which exceeds the 25 percent threshold allowed for non-MTW PHAs.

**iii. Planned Non-Significant Changes**

AH does not plan any non-significant changes to this activity during the plan year.

**iv. Planned Changes to Metrics/Data Collection**

AH does not plan any changes to Metrics/Data Collection to this activity during the plan year.

**v. Planned Significant Changes**

AH does not plan any significant changes to this activity during the plan year.

## B. Not Yet Implemented Activities

### **i. Brief Description of the Approved MTW Activity, Proposed in an Annual MTW Plan, Approved by HUD, and Not Yet Implemented**

AH proposed **SH.2022.01 – Choice Neighborhoods Down Payment Assistance Program** specifically for low-income families choosing to own a home within the transforming former University Homes public housing site (renamed Scholars Landing). AH is utilizing a \$30 million Choice Neighborhoods Implementation Grant to revitalize the University Choice Neighborhood (UCN) comprised of the Ashview Heights, Atlanta University Center, and Vine City neighborhoods. AH has started the five-phase revitalization plan for Scholars Landing. The first four phases of the plan include scores of rental units, while the fifth and final phase of the plan includes a homeownership component that will include a combination of townhomes, flats, and/or condominiums.

### **ii. Provide an Update on the Implementation Plan for the MTW Activity**

AH has taken steps in designing its Choice Neighborhoods Down Payment Assistance Program while construction continues in the UCN on final rental units and begins on homeownership units. Pandemic economics has affected all facets of the construction process causing a slowdown in the various construction stages.

### **iii. Provide an Explanation of any Non-Significant Changes or Modifications to the MTW Activity**

N/A

## C. Activities On Hold

### **i. Describe the Approved MTW Activity that was Approved, Implemented, and MTW PHA Stopped Implementing (but has plans to reactivate in the future)**

N/A

### **ii. Provide an Update on the Plan for Reactivating the MTW Activity**

N/A

### **iii. Provide an Explanation of any Non-Significant Changes or Modifications to the MTW Activity since it was Approved by HUD**

N/A

## D. Closed Out Activities

### **i. List the Closed out MTW Activities. Specify Plan Year(s) in which the MTW Activity was Approved, Implemented (as applicable), and Closed out**

Activities listed on close-out table (please see page 66).

### **ii. Explanation of why the MTW Activity was Closed out**

Explanation details listed on close-out table (please see page 66).

MTW Activity		Fiscal Year			Close Out Reason
Number	Name	Approved	Implemented	Closeout	
N/A	American Recovery and Reinvestment Act ( <b>ARRA</b> ) of 2009	N/A	2009 <sup>24</sup>	2012	AH did not need an MTW waiver to conduct this activity.
N/A	Voluntary Compliance Agreement ( <b>VCA</b> )	N/A	2009 <sup>25</sup>	2011	AH did not need an MTW waiver to conduct this activity.
PH. 2003.01	Affordable Fixed Rent / Affordable Flat Rent	2003	N/A	2017	AH combined this activity with PH.2017.01 – Elimination of Flat Rent.
SH. 2005.08	Independent Living Demonstration	2005	2005	2020	AH has not been able to move forward with this activity because of various local and state requirements. In addition, it is unclear if an MTW waiver(s) is required.
RE. 2005.09	Reformulating Subsidy Arrangement in AH-Sponsored Mixed-Use Communities, including Centennial Place and AH's Affordable Communities	2005	2005	2023	AH elected to close out this activity because of HUD's introduction of the Rental Assistance Demonstration (RAD) Program.
HD. 2005.14	Individual Development Accounts ( <b>IDAs</b> )	2005	N/A	2019	AH elected not to implement this MTW Activity.
HC. 2006.03	Housing Choice Inspection Fees	2006	N/A	2019	AH determined that this activity requires more research. AH may propose this activity later.
HD. 2006.04	Standards for Residency in Single-Family Homes	2006	N/A	2008	AH did not need an MTW waiver to conduct this activity.
HC. 2006.05	Port Administration Re-engineering	2006	N/A	2019	Activity not supported under MTW Authorizations.
HC. 2007.02	Rent Reasonableness	2007	2007	2023	AH did not need an MTW waiver to conduct this activity. This policy is an MTW requirement.
HD. 2007.05	Housing Choice Family Self-Sufficiency ( <b>FSS</b> ) Program Re-engineering	2007	N/A	2008	AH combined this activity with RE.2007.03 – Comprehensive Homeownership Program.
RE. 2007.06	Quality of Life Initiative ( <b>QLI</b> )	2007	2007	2010	AH did not need an MTW waiver to conduct this activity.

<sup>24</sup> AH's estimated implementation year of Federal grant award.

<sup>25</sup> AH made enhancements and improvements to facilities, programs, policies, and procedures in response to accessibility requirements.

MTW Activity		Fiscal Year			Close Out Reason
Number	Name	Approved	Implemented	Closeout	
PH. 2007.07	Utility Allowance Waiver	2007	2007	2010	AH elected to close out this activity based on AH analysis (admin costs outweighed estimated revenue).
SH. 2008.04	John O. Chiles Annex Supportive Housing Pilot	2008	2008	2014	AH did not need an MTW waiver to conduct this activity.
HD. 2008.05	Pre-Relocation Client Education (part of QLI)	2008	2008	2010	AH did not need an MTW waiver to conduct this activity.
AW. 2010.01	Business Transformation Initiative (ERP solution)	2010	2010	2016	AH did not need an MTW waiver to conduct this activity.
AW. 2011.01	Non-Elderly Disabled Income Disregard	2011	2011	2020	AH combines this activity with AW.2005.02 – Elderly Income Disregard and may be able to close both activities in accordance with Notice PIH 2016-05 (HA) – Streamlining Admin. Regs for Programs Administered by PHAs.
AW. 2011.02	HCV Program Housing Assistance Payment Abatement Policy	2011	2011	2022	AH did not need an MTW waiver to conduct this activity.
AW. 2011.03	Aging Well Program	2011	2011	2022	AH did not need an MTW waiver to conduct this activity.
RE 2012.01	Single Family Home Rental Demonstration	2012	2012	2021	AH met its obligation to deliver 26 homes under this format. Until homebuyers completed home purchase, AH will manage a long-term ground lease.
HC. 2012.02	Comprehensive Graduation Program	2012	N/A	2019	AH determined that this activity requires more research. AH may propose this activity later.
SH 2013.01	Veterans Supportive Housing	2013	2013	2022	AH no longer needs an MTW waiver to conduct this activity.
HD. 2013.02	Endowment Fund for Human Development Services	2013	N/A	2019	AH determined that this activity requires more research. AH may propose this activity later.
PH 2017.01	Elimination of Flat Rent	2017	2017	2020	AH has converted all the Flat Rent paying families to income-based rent. AH only offers the income-based rent option for current and future program participants.

MTW Activity		Fiscal Year			Close Out Reason
Number	Name	Approved	Implemented	Closeout	
SH 2017.01	Next Step Youth Self-Sufficiency Program	2017	N/A	2021	AH never implemented this activity because the activity relied on receiving Foster Youth referrals aging out of foster care from the State of GA. Although an MOU was in place, AH did not receive any referrals from the state to date and AH reallocated those vouchers to create other homelessness prevention programs.



## V. PLANNED APPLICATION OF MTW FUNDS

### A. Planned Application of MTW Funds

#### i. Estimated Sources of MTW Funds

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

**Note:** the information collected in this section is to fulfill MTW programmatic reporting requirements and does not replace the MTW PHA's obligation to annually complete its audited financial statements through HUD's Financial Data Schedule (FDS)

FDS LINE-ITEM NUMBER	FDS LINE-ITEM NAME	DOLLAR AMOUNT
70500 (70300+70400)	Total Tenant Revenue	\$3,459,647
70600	HUD PHA Operating Grants	\$336,051,128
70610	Capital Grants	\$17,552,969
70700 (70710+70720+70730+70740+70750)	Total Fee Revenue	\$2,268,622
71100+72000	Interest Income	\$1,984,628
71600	Gain or Loss on Sale of Capital Assets	\$124,388
71200+71300+71310+71400+71500	Other Income	\$870,764
<b>70000</b>	<b>Total Revenue</b>	<b>\$362,312,147</b>

#### ii. Estimated Application of MTW Funds

The MTW PHA shall provide the estimated application of MTW funding in the plan year by Financial Data Schedule (FDS) line item. Only amounts estimated to be spent during the plan year should be identified here; unspent funds that the MTW PHA is not planning on expending during the plan year **should not be** included in this section.

**Note:** the information collected in this section is to fulfill MTW programmatic reporting requirements and does not replace the MTW PHA's obligation to annually complete its audited financial statements through HUD's Financial Data Schedule (FDS)

FDS LINE-ITEM NUMBER	FDS LINE-ITEM NAME	DOLLAR AMOUNT
91000 (91100+91200+91400+91500+91600+91700+91800+91900)	Total Operating - Administrative	\$61,946,772
91300+91310+92000	Management Fee Expense	\$635,100
91810	Allocated Overhead	\$0
92500 (92100+92200+92300+92400)	Total Tenant Services	\$4,377,597
93000 (93100+93600+93200+93300+93400+93800)	Total Utilities	\$2,246,447
93500+93700	Labor	\$0
94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	\$6,011,415
95000 (95100+95200+95300+95500)	Total Protective Services	\$1,866,879
96100 (96110+96120+96130+96140)	Total Insurance Premiums	\$2,332,174
96000 (96200+96210+96300+96400+96500+96600+96800)	Total Other General Expenses	\$10,557,579
96700 (96710+96720+96730)	Total Interest Expense & Amortization Cost	\$157,991
97100+97200	Total Extraordinary Maintenance	\$17,495,443
97300+97350	HAP + HAP Portability-In	\$200,484,498
97400	Depreciation Expense	\$3,052,053
97500+97600+97700+97800	All Other Expense	\$51,148,200
<b>90000</b>	<b>Total Expenses</b>	<b>\$362,312,147</b>

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

N/A

**iii. Description of Planned Use of MTW Single Fund Flexibility**

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

<b>PLANNED APPLICATION OF MTW FUNDING FLEXIBILITY</b>
<p>AH will spend its MTW Funds, defined as its Public Housing Operating Subsidy, Housing Choice Voucher funds, and certain capital funds combined into a single fund pursuant to the authority outlined in AH's MTW Agreement, on MTW eligible activities.</p> <p>AH does not identify a singular activity nor multiple activities in which AH utilizes the MTW Single Fund Flexibility that do not require MTW Authorization(s) under Attachment C or D of AH's Standard and Restated MTW Agreement. Rather, unless non-MTW funds are specifically used, AH considers all activities involved in providing affordable housing to residents of Atlanta as utilizing MTW Single Fund Flexibility, as AH does not focus on specific programmatic requirements, but makes business decisions based on sound business intelligence and analysis.</p> <p>AH continues to direct funding towards specific housing and service delivery programs that respond to local needs or as set forth in AH's business plan and which AH determines the best use of funds for the purposes of fulfilling its mission to deliver innovative, affordable housing.</p>

**iv. Planned Application of PHA Unspent Operating Fund and HCV Funding**

Original Funding Source	Beginning of FY: Unspent Balances	Planned Application of PHA Unspent Funds during FY
HCV HAP*	\$0	\$0
HCV Admin Fee	\$0	\$0
PH Operating Subsidy	\$0	\$0
<b>TOTAL:</b>	<b>\$0</b>	<b>\$0</b>

**Description of Planned Expenditures of Unspent Operating Fund and HCV Funding**

The MTW PHA shall provide a description of planned activities and/or use(s) for unexpended Operating Fund and HCV Funding. The original funding source is defined as the legacy MTW PHA's appropriated Section 8 and Section 9 funding source(s) (HCV HAP, HCV Admin Fee, and PH Operating Subsidy). The MTW agency receives this information in their Annual Renewal Allocation, which provides a breakdown of the annual obligations for HCV HAP. For HCV Admin Fee, the biannual cash management reconciliation includes the HCV Admin Fee that has been earned at two points during the year; midyear at June 30<sup>th</sup> and end-of-year at December 31<sup>st</sup>. For the public housing operating fund unspent balance, the MTW PHA may derive their unspent funds by subtracting current assets from current liabilities in the most recent FDS submission. Current assets are the sums of FDS lines 111, 114, 115, 120, 131, 135, 142, 144, and 145. Current liabilities are the sums of FDS line 310 and 343. Table XX below represents the applicable FDS lines with definitions that MTW PHA(s) should utilize to calculate public housing operating fund unspent funds. More information on FDS line-items can be found at: [https://www.hud.gov/sites/dfiles/PIH/documents/FDSLLineDefinitionGuide\\_vJuly2020.pdf](https://www.hud.gov/sites/dfiles/PIH/documents/FDSLLineDefinitionGuide_vJuly2020.pdf)

Table XX: FDS Line Items Used to Calculate Public Housing Operating Fund Unspent Funds

FDS Line Number	FDS Line Item	Definition
<b>Current Assets</b>		
111	Cash-Unrestricted	This FDS line represents cash and cash equivalents in any form available for use to support any activity of the program or project.
114	Cash-Tenant Security Deposits	This FDS line represents cash in the Security Deposit Fund.
115	Cash-Restricted for Payment of Current Liabilities	This line represents restricted cash and cash equivalents that are only to be expended for specified purposes.
120	Total Receivables	This line represents the total of all receivables less the amounts established as allowances for estimated uncollectible amounts.
131	Investments-Unrestricted	This line represents the fair market value of all investments which can be used to support any activity of a program, project, activity, COCC, or entities.
135	Investments-Restricted for Payment of Current Liability	This line represents the fair market value of all investments designated for specific purposes that will be used to liquidate a current liability in the next fiscal year or offset unearned revenue.
142	Prepaid Expenses and Other Assets	This line represents all prepaid expenses. These are not expected to be converted.
144	Inter-program-Due From	This line represents amounts due from other PHA projects, programs, and activities of a temporary nature.
145	Assets Held for Sale	This line item represents assets that the entity expects to sell to qualified applicants. This line item is typically used as part of the homeownership program.
<b>Current Liabilities</b>		
310	Total Current Liabilities	This FDS line is the sum of lines 311 through 348 and represents the total of all current liabilities.
343	Current Portion of Long-Term Debt (Capital Projects/Bonds)	This line includes the current portion of debts acquired and debts issued for capital purposes of the PHA/entity.

For HCV funding, the biannual cash management reconciliation for HUD-held reserves includes both HCV and SPV reserves. MTW PHA(s)' accounting records should include sufficient detail to report on the amount that are HCV versus SPV reserves. Where possible, please identify the planned use, the estimated amount, to which funding source the planned use(s) is attributable, as well as the projected timeline or timeline update.

**Note:** the information collected in this section is to fulfill MTW programmatic reporting requirements and does not replace the MTW PHA's obligation to annually complete its audited financial statements through HUD's Financial Data Schedule.

Regardless of the balance identified as Unspent Operating Fund and HCV Funding, AH spends all the funds disbursed by HUD for Operating Fund within 30 days of receipt; and spends all HCV funds within 30 days of disbursement. Due to HUD's Cash Management program, HUD only provides HCV funds equal to prior month HAP spending each month. AH then requests additional cash from HUD to cover prior month MTW-authorized operations and activities and additional cash to support no more than the remaining month of estimated operations and activities.

\* Unspent HAP funding should not include amounts recognized as Special Purpose Vouchers reserves.

\*\* HUD's approval of the MTW Plan does not extend to a PHA's planned usage of unspent funds amount entered as an agency's operating reserve. Such recording is to ensure agencies are actively monitoring unspent funding levels and usage(s) to ensure successful outcomes as per the short- and long-term goals detailed in the Plan.

## B. Local Asset Management Plan

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

## C. Rental Assistance Demonstration (RAD) Participation

**i. Description of RAD Participation**

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

### RENTAL ASSISTANCE DEMONSTRATION (RAD) PARTICIPATION

AH received a portfolio award to convert 3,741 PH units to long-term Section 8 assistance under the RAD Program. AH elected to convert its PH units to PBV assisted units. AH submitted a RAD Significant Amendment to HUD that HUD approved on November 15, 2016. AH has converted 1,742 units and plans to convert 315 units during FY 2024. AH received multiple Commitment to Enter into Housing Assistance Payments (CHAPs) in 2018, and various new CHAPs in FY 2022. AH is working to convert its remaining approved public housing portfolio of units by FY 2027.

- ii. Has the MTW PHA submitted a RAD Significant Amendment in the appendix? A RAD Significant Amendment should only be included if it is a new or amended version that requires HUD approval.
- iii. If the MTW PHA has provided a RAD Significant Amendment in the appendix, please state whether it is the first RAD Significant Amendment submitted or describe any proposed changes from the prior RAD Significant Amendment?
-

## VI. ADMINISTRATIVE

### A. Board Resolution and Certifications of Compliance

Please **see page 77 of Appendix A** to review the Board Resolution and Certifications of Compliance.

### B. Documentation of Public Process

**AH's FY 2024 MTW Annual Plan is available** for public review and comment on its website and through AH's social media platforms from **February 5 through March 7**. In addition, AH holds a series of public meetings and a public hearing during this time to receive comments on planned activities. Further, AH permits public discussion of agenda items prior to their adoption. Please **see page 91 of Appendix B** to review AH's public process.

### C. Planned and Ongoing Evaluations

There is no AH directed, nor HUD required evaluations included in this Plan. AH may conduct internal evaluations on its MTW Demonstration Program, MTW Activities, or other areas of performance, which AH will include in its Annual MTW Report as applicable and appropriate.

### D. Lobbying Disclosure

AH does not engage in lobbying activities. Therefore, AH only includes the Certification of Payments form (HUD-50071). Please **see page 113 of Appendix D** to review applicable document.

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## **Appendix A: HUD Form 50900 Attachments**

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Board Secretary Certificate  
Board Resolution  
Certifications of Compliance

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**SECRETARY’S CERTIFICATE**

**I, EUGENE E. JONES, JR., 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 2024 Moving To Work (MTW) Annual Report to the United States Department of Housing and Urban Development in accordance with AHA’s Amended and Restated MTW Agreement.
3. This resolution was presented to the AHA Board of Commissioners (the “Board”) at its Regular Meeting on March 22, 2023 (the “Meeting”).
4. The following Board members were present for the Meeting:

Larry Stewart, Chair  
Sarah Kirsch  
Rosalind Elliott  
Tené Traylor

5. At the Meeting, the Board 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 22<sup>nd</sup> day of March, 2023.

SEAL



  
\_\_\_\_\_  
**EUGENE E. JONES, JR.,**  
Secretary

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**RESOLUTION NO. 23-12**

**THE HOUSING AUTHORITY OF THE CITY OF ATLANTA, GEORGIA SEEKS  
AUTHORIZATION TO SUBMIT ITS FISCAL YEAR 2024 MOVING TO WORK  
ANNUAL PLAN TO THE UNITED STATES DEPARTMENT OF HOUSING  
AND URBAN DEVELOPMENT**

**WHEREAS**, The Housing Authority of the City of Atlanta, Georgia (“AH”) executed its Amended and Restated Moving To Work (“MTW”) Agreement, effective as of November 13, 2008, as extended by Congress to June 30, 2028 under the same terms and conditions and confirmed by the United States Department of Housing and Urban Development (“HUD”) on April 14, 2016, and as further amended by First, Second, Third, and Fourth Amendments to the Moving to Work Agreement, effective as of December 1, 2020 (collectively “MTW Agreement”);

**WHEREAS**, the MTW Agreement is effective through June 30, 2028, unless further extended;

**WHEREAS**, the MTW Agreement requires AH to submit an MTW Annual Plan to HUD in lieu of the Annual Plan and Five-Year 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 AH Board of Commissioners (“Board”) approving the plan and certifying that a public hearing has been held regarding the plan;

**WHEREAS**, AH has prepared its Fiscal Year (“FY”) 2024 MTW Annual Plan (also referred to herein as the “FY 2024 MTW Annual Plan”);

**WHEREAS**, the FY 2024 MTW Annual Plan identifies AH’s priorities, projects, activities and initiatives for AH’s FY 2024 and any policy changes to be implemented during FY 2024;

**WHEREAS**, AH’s FY 2024 MTW Annual Plan is the product of a comprehensive planning process in which AH’s Senior Management consulted with AH’s Board of Commissioners, resident association leaders, public housing-assisted residents, Housing Choice participants and landlords, AH employees, Atlanta Legal Aid, Georgia Law Center for the Homeless, AH’s private sector development partners, members of the AH 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 AH and incorporated as deemed appropriate;

**WHEREAS**, the consultation process included a properly advertised and noticed public hearing held on March 2, 2023;

**WHEREAS**, during FY 2024, AH will continue to advance its real estate initiatives to create or preserve more housing opportunities, to advance its human development and self-sufficiency initiatives, and to streamline its service delivery approach and financial protocols;

**WHEREAS**, AII's Senior Management consulted with the AH 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 2024, as described in Exhibit 23-12-A; and

**WHEREAS**, Senior Management of AH recommends that the Board of Commissioners: (i) approve AH's FY 2024 MTW Annual Plan; (ii) authorize the submission of AH's FY 2024 MTW Annual Plan to HUD; (iii) authorize the Chair of the Board of Commissioners and AH's President and Chief Executive Officer/Secretary to execute the HUD Certifications of Compliance, attached as Exhibit 23-12-B; (iv) approve the implementation of the projects, activities, initiatives and any policy changes set forth in the FY 2024 MTW Annual Plan; and (v) approve the adoption and implementation of the Amended and Restated Statement of Corporate Policies;

**NOW, THEREFORE, BE IT RESOLVED BY THE BOARD OF COMMISSIONERS OF THE HOUSING AUTHORITY OF THE CITY OF ATLANTA, GEORGIA ("AH"), THAT:**

1. Atlanta Housing's Fiscal Year ("FY") 2024 Moving to Work Annual Plan (the "FY 2024 MTW Annual Plan"), including the projects, activities, initiatives, and any policy changes that will be implemented during FY 2024 as described in Exhibit 23-12-A, is hereby approved.
2. Each of the Chair of the Board of Commissioners and the President and Chief Executive Officer/Secretary, as required, is hereby authorized to execute Exhibit 23-12-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 AII's FY 2024 MTW Annual Plan.
3. The President and Chief Executive Officer is authorized to submit AH's FY 2024 MTW Annual Plan and such other required documents, certifications, or forms to HUD with such changes, additions, corrections or amendments as he shall deem necessary or appropriate or as may be required by HUD.
4. 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 2024 MTW Annual Plan.

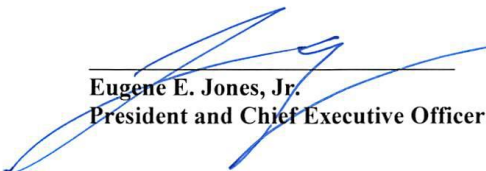
[Signatures on the Following Page]



ADOPTED, by the Board of Commissioners of The Housing Authority of the City of Atlanta, Georgia and signed in authentication of its passage, 22<sup>nd</sup> day of March 2023.

ATTEST:

APPROVAL:

  
\_\_\_\_\_  
**Eugene E. Jones, Jr.**  
President and Chief Executive Officer

  
\_\_\_\_\_  
**Larry E. Stewart**  
Chair

APPROVAL FOR FORM AND LEGAL SUFFICIENCY:

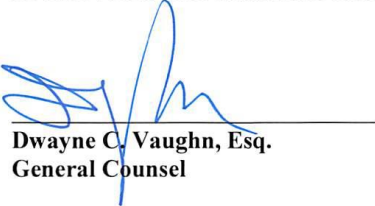
  
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**Dwayne C. Vaughn, Esq.**  
General Counsel

Exhibit 23-12-A – Page 1  
FY 2024 MTW ANNUAL PLAN PRESENTATION



## STRATEGIC GOALS FY 2023-2027

GOAL 1: Create or Preserve 10,000 Housing Units

GOAL 2: Enhance Housing Assistance Resources for Atlantans in Need

GOAL 3: Create Opportunities for Individuals, Families, and Children to Thrive

GOAL 4: Build or Expand Partnerships to Pool Resources and Maximize Impact for the Benefit of Families

GOAL 5: Communicate the Impact of Atlanta Housing’s Work to Atlanta

GOAL 6: Strengthen Atlanta Housing Operations





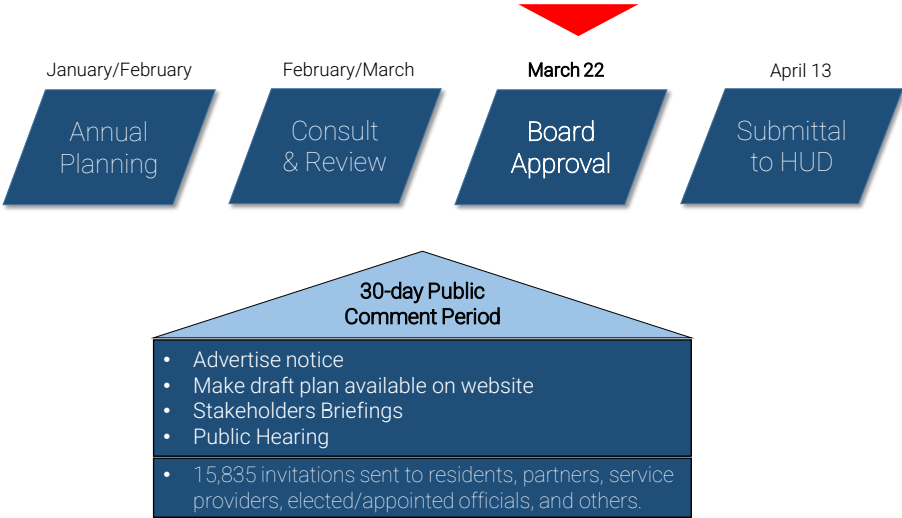



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Exhibit 23-12-A – Page 2

# MTW PLAN PROCESS



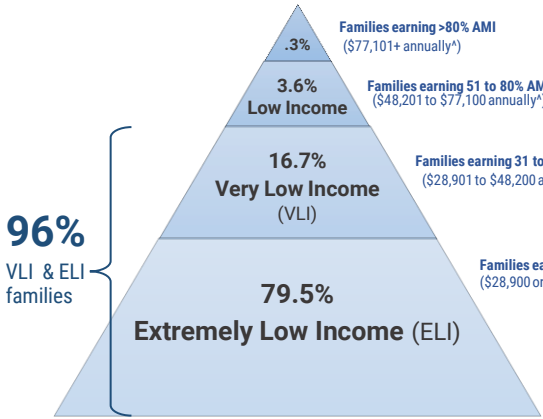
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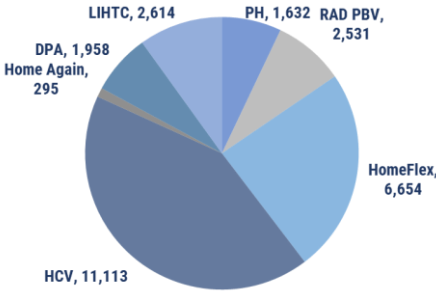
# PROJECTED FY 2024 HOUSEHOLDS SERVED



**26,797** Projected Total Households (HHs) Served in FY 2024



\*Source: HUD Income Limits approved April 2022 and based on a Family of Four.



889 Projected New Households			
<b>100</b> New HomeFlex Households	<b>250</b> New HCV Households	<b>295</b> New Home Again Households	<b>244</b> New DPA Households

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# CREATE & PRESERVE

## Overview of New Units



Rendering of Englewood Redevelopment

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AH Plans to Create **1,095** Affordable Units in FY 2024

### FINANCIAL CLOSINGS

- **511** Affordable Units on AH Land
- **232** Co-Investment Units

### HOMEFLEX

- **100** New HomeFlex Units

### HOMEOWNERSHIP

- **244** DPA Awards
- **8** Affordable Townhouses at Scholar's Landing

# CREATE & PRESERVE

## Preservation Overview

In addition to creating affordable units, AH is committed to preserving affordable units in its housing assistance portfolio\*

AH plans to preserve **1,069** Affordable Units in FY 2024

- **315** affordable units projected to be preserved by converting PH units to RAD PBV\* and non-RAD PBV\* units
- **754** affordable units projected to be preserved by renewing 13 expiring HomeFlex Agreements

\*RAD PBV = Rental Assistance Demonstration Project-Based Voucher

\*AH may also participate in deals to preserve expiring affordable units or "naturally-occurring affordable" units that are not currently in its portfolio, either through acquisition, deal participation, or other means.

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Exhibit 23-12-A – Page 4

# OTHER PLANNED ACTIVITIES

- **Implement Roosevelt Hall Use Plan**, including the design and implementation of resident programming and expending retail tenant improvement allowance.
- **Pursue Choice Neighborhoods Planning or Implementation Grants** for Bowen Homes, Thomasville Heights, or other eligible projects.
- **Reduce HCV Program Workload by 10%** through implementation and administration of new MTW Activity while advancing AH’s Biennial HQS Inspection Schedule (project nearly 18,000 HQS Inspections).
- **Promote economic mobility and educational opportunities for residents**, utilizing ACCESS, AHGreen, Youth Scholarships, and other programs.

**Stabilize at-risk families by:**

- Dedicating 525** vouchers to the HAVEN CoC
- Assisting 295** families under Home Again
- Housing up to 75** families with APS Vouchers
- Advancing 550-unit PSH Commitment**  
393 units in pipeline

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## Exhibit 23-12-B – Page 1

<b>CERTIFICATIONS OF COMPLIANCE</b>
<p><b>U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT</b>  <b>OFFICE OF PUBLIC AND INDIAN HOUSING</b></p> <p><b>Certifications of Compliance with Regulations:</b>  <b>Board Resolution to Accompany the Annual Moving to Work Plan</b></p>
<p>Acting on behalf of the Board of Commissioners of the Moving to Work Public Housing Agency (MTW PHA) listed below, as its Chairman or other authorized MTW PHA official if there is no Board of Commissioners, I approve the submission of the Annual Moving to Work Plan for the MTW PHA Plan Year beginning <b>(07/01/2023)</b>, 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:</p> <ol style="list-style-type: none"> <li>(1) The MTW PHA published a notice that a hearing would be held, that the Plan and all information relevant to the public hearing was available for public inspection for at least 30 days, that there were no less than 15 days between the public hearing and the approval of the Plan by the Board of Commissioners, and that the MTW PHA conducted a public hearing to discuss the Plan and invited public comment.</li> <li>(2) The MTW PHA took into consideration public and resident comments (including those of its Resident Advisory Board or Boards) before approval of the Plan by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the Annual MTW Plan.</li> <li>(3) The MTW PHA certifies that the Board of Directors has reviewed and approved the budget for the Capital Fund Program grants contained in the Capital Fund Program Annual Statement/Performance and Evaluation Report, form HUD-50075.1 (or successor form as required by HUD).</li> <li>(4) The MTW PHA will carry out the Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990.</li> <li>(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.</li> <li>(6) The Plan contains a certification by the appropriate state or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice, for the MTW PHA's jurisdiction and a description of the manner in which the Plan is consistent with the applicable Consolidated Plan.</li> <li>(7) The MTW PHA will affirmatively further fair housing by fulfilling the requirements at 24 CFR 903.7(o) and 24 CFR 903.15(d), which means that it will take meaningful actions to further the goals identified in the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR 5.150 through 5.180, that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing, and that it will address fair housing issues and contributing factors in its programs, in accordance with 24 CFR 903.7(o)(3). Until such time as the MTW PHA is required to submit an AFH, and that AFH has been accepted by HUD, the MTW PHA will address impediments to fair housing choice identified in the Analysis of Impediments to fair housing choice associated with any applicable Consolidated or Annual Action Plan under 24 CFR Part 91.</li> <li>(8) The MTW PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.</li> <li>(9) In accordance with 24 CFR 5.105(a)(2), HUD's Equal Access Rule, the MTW PHA will not make a determination of eligibility for housing based on sexual orientation, gender identify, or marital status and will make no inquiries concerning the gender identification or sexual orientation of an applicant for or occupant of HUD-assisted housing.</li> <li>(10) The MTW PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.</li> <li>(11) The MTW PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.</li> <li>(12) The MTW PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.</li> <li>(13) The MTW PHA will comply with requirements with regard to compliance with restrictions on lobbying required by 24 CFR Part 87, together with disclosure forms if required by this Part, and with restrictions on payments to influence Federal Transactions, in accordance with the Byrd Amendment and implementing regulations at 49 CFR Part 24.</li> </ol>

Exhibit 23-12-B – Page 2

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

The Housing Authority of the City of Atlanta	GA 006
<b>MTW PHA NAME</b>	<b>MTW PHA NUMBER/HA CODE</b>
<i>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).</i>	
Larry Stewart	Chair, Board of Commissioners
<b>NAME OF AUTHORIZED OFFICIAL</b>	<b>TITLE</b>
	March 22, 2023
<b>SIGNATURE</b>	<b>DATE</b>
<small>*Must be signed by either the Chairman or Secretary of the Board of the MTW PHA's legislative body. This certification cannot be signed by an employee unless authorized by the MTW PHA Board to do so. If this document is not signed by the Chairman or Secretary, documentation such as the by-laws or authorizing board resolution must accompany this certification.</small>	



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# Appendix B: Public Process Documentation

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## Summary Documentation

Overview of Stakeholders Briefings and Public Hearing  
Public Comments

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**DOCUMENTATION OF PUBLIC PROCESS**

AH follows the City of Atlanta’s lead regarding weather-related and emergency protocol. In response to the Coronavirus (COVID-19) pandemic, AH limited in-person meetings and public access at its corporate and satellite offices during first half of FY 2023. As an alternative, AH conducted virtual meetings. **During the second half of FY 2023, AH resumed in-person meetings** in the preparation of its FY 2024 MTW Annual Plan. Further, AH continued virtual meetings and **began offering hybrid meetings** as well.

AH’s Plan is the product of an inclusive annual planning process involving consultation with AH-assisted families across all programs, strategic partners, service providers, local community members and housing advocacy organizations, state, and local agencies, elected and appointed officials, AH staff, executive leadership, members of the public, and AH’s Board of Commissioners. Below is a summary of AH’s Stakeholders Briefings (public meetings) and public hearing held during its **public comment period: February 5, 2023 through March 7, 2023** that focused on AH’s FY 2024 MTW Annual Plan and proposed policy changes.

FY 2024 Public Comment Period Notification and Outreach				
Date	Outreach Effort	Total Outreach	Public	AH Staff
Tuesday, January 10, 2023	AH MTW Announcement: Atlanta Continuum of Care (CoC) Meeting	81	80	1
	Public Hearing Notice: CoC Newsletter Distribution	838	838	*
Friday, January 13, 2023	Public Hearing Notice: Email Blast to HomeFlex Communities & Property-Manager Developers (PMDs)	127	117	10
Friday, February 3, 2023	Public Hearing Notice: List on HCV’s Owner Portal & Announcement to Landlord Advisory Committee	5,404	5,400	4
Monday, February 6, 2023	Public Hearing Invitation to Housing Choice Voucher Families via Email Blast	9,013	9,012	1
Various Dates	Public Meeting Invitation to AH Stakeholders via Email Blast	385	384	1
<b>Total Outreach: Stakeholder Invitations and Public Hearing Notice</b>		<b>15,852</b>	<b>15,835</b>	<b>17</b>

*\*Not reported or unavailable.*

FY 2024 Stakeholders Briefings and Public Hearing Attendance				
Meeting/Hearing Date	Stakeholders Group	Total Attendance	Public	AH Staff
Tuesday, February 7, 2023	Jurisdiction Wide Council (JWC)	14	9	5
Thursday, February 9, 2023	Academia, Housing Advocates, and Legal	14	4	10
Tuesday, February 14, 2023	Choice Neighborhood Advisory, Human Development Services, and Real Estate Sub-Cabinet	10	3	7
Thursday, February 16, 2023	Business and Philanthropy	13	2	11
Thursday, February 23, 2023	Public Officials	26	8	18
<b>Thursday, March 2, 2023</b>	<b>Public Hearing</b>	<b>70</b>	<b>45</b>	<b>25</b>
<b>Total Attendance: Stakeholders Briefings and Public Hearing</b>		<b>147</b>	<b>71</b>	<b>76</b>

AH makes its 2024 MTW Annual Plan available for review on AH’s website and will send the Plan or presentation materials electronically to individuals, communities, and organizations by request. AH will hold Stakeholder Briefings (public meetings) and a public hearing in person and via the Zoom platform to accept comments on its 2024 MTW Annual Plan. In addition, AH will accept comments on its 2024 MTW Annual Plan in writing by US Mail, email, via fax, or by phone via a dedicated voice mailbox. AH will consider all comments on the 2024 MTW Annual Plan received by March 10, 2023.

AH communicates notification of The Plan, its availability and the Public Hearing via public notices posted in AH-Owned communities and buildings, on AH’s website, via electronic correspondences to AH Stakeholders, and via local and social media outlets. Additionally, to address the diversity of AH residents in AH-Owned communities; AH posted notices in Chinese, Korean, Russian, and Spanish. Public Notices announcing AH’s Public Hearing appeared in the following media publications:

<b>FY 2024 Stakeholders Briefings and Public Hearing Notifications</b>	
<b>Publication</b>	<b>Publication of Notification</b>
Fulton County Daily Report	Thursday, February 16, 2023
Mundo Hispanico Ediciones	Thursday, February 16, 2023
The Atlanta Voice	Friday, February 17, 2023
Mundo Hispanico Ediciones	Thursday, February 23, 2023
The Atlanta Voice	Friday, February 24, 2023
Atlanta Journal Constitution	Tuesday, February 28, 2023
Fulton County Daily Report	Tuesday, February 28, 2023
Atlanta Journal Constitution	Wednesday, March 1, 2023

AH's 2024 STAKEHOLDERS BRIEFINGS AND PUBLIC HEARING SESSION			
Meeting / Hearing Date	Stakeholder Group	Public Comment	AH Response / Action
Tuesday, January 10, 2023	Atlanta Continuum of Care (CoC)	No Comments; Plan Well Received	AH continues to value and appreciate the collaboration with the CoC and its membership.
Tuesday, February 7, 2023	Jurisdiction Wide Council	Who decides new builds and who decides how many units will be affordable?	The following elements factor into new build decisions: market demand or need, market conditions, and available funding. The affordable unit count is usually a formula that factors the number of market units and subsidized units needed to meet demands while making it financially sustainable for all parties involved.
		Who came up with the number of affordable units at the Civic Center?	The number of affordable units in a project is formula based and factors the number of market units and subsidized units that can cooperate in a project while providing an acceptable return on investment.
		Who came up with the pyramid for income based on a family of four?	AH staff came up with the pyramid design to display the income ranges that AH-assisted families fall within. The income-based ranges or Area Median Income (AMI) is produced by HUD. HUD updates this data at least annually.
		O'Hern House is dark and dingy, what can be done to improve the lighting and safety there?	AH can discuss the concerns expressed with the current management team to learn what actions have been taken to improve O'Hern House, including mitigating safety issues, and working with GA Power's lighting and smart services team as AH did at Cosby Spear Highrise in 2021.
		Will the 76 units at O'Hern House be new units or [are they] existing units?	The 76 units at O'Hern House are existing units that AH is subsidizing. These units are scheduled for renovation. In the meantime, AH will share concerns raised in this forum to address conditions of concern at the property.

AH's 2024 STAKEHOLDERS BRIEFINGS AND PUBLIC HEARING SESSION			
Meeting / Hearing Date	Stakeholder Group	Public Comment	AH Response / Action
Tuesday, February 7, 2023	Jurisdiction Wide Council	How do you [as an individual] research all of the programs and funding available?	There is no singular great way to share information since AH sponsors and supports several different assistance programs, but AH's advice is to secure a list of properties that receive an AH subsidy. Properties include AH-owned and mixed-income communities offering rental assistance. Properties have their own waiting list and different assistance programs: public housing, RAD PBV, or HomeFlex, so one would go to each property individually to express an interest.
		When our properties get turned into RAD, we lose our security and our votes are not considered, for example, we have dishwashers when we voted against it.	AH will share concerns raised in this forum to address these concerns and AH's future redevelopment projects.
		Windows do not open at 10 <sup>th</sup> and Juniper.	AH will share concerns raised in this forum to address window concerns and access conditions at the property.
		Communication [it seems] is not for the young people. We have young people, not disabled, living in our bldg., but there is not anything for them.	AH will share concerns raised in this forum to address communication concerns at the property.
Thursday, February 9, 2023	Academia Legal Housing Advocates	What would qualify for a hardship exemption?	Assisted family requests are evaluated on a case-by-case basis. In general, financial burdens, loss of eligibility, reasonable accommodation, and similar circumstances may arise to a hardship exemption. which AH will be considered as presented.
		Do we [Does AH have] have any units focused in Buckhead?	No. Currently there is limited availability and limited opportunities within areas making up Buckhead. Pricing is a factor as well. AH remains focused on creating units in areas that we own or pegged for revitalization.



AH's 2024 STAKEHOLDERS BRIEFINGS AND PUBLIC HEARING SESSION			
Meeting / Hearing Date	Stakeholder Group	Public Comment	AH Response / Action
Tuesday, February 14, 2023	Real Estate Sub-Cabinet, Choice Neighborhoods Advisory, and Human Development Services Advisory Committees	Can you explain HomeFlex again?	AH deployed MTW flexibility to create an MTW project-based rental assistance program known as HomeFlex. Under HomeFlex, and by agreement, private landlords accept a monthly subsidy for units to house eligible, low-income families. The agreement terms range from two to twenty years and can be renewed. The eligible family pays 30% of their income towards rent and the subsidy remains with the unit for the next eligible family.
		Are the four properties on slide #11 fairly new properties?	Of the four proposed properties, 277 Moreland, 588 Paines Avenue, Abbingdon at Ormewood, and McAuley Park, Abbingdon at Ormewood is a new construction project and the other properties are existing structures. All properties would have new HomeFlex Agreements.
		Are you seeing a lot of folks [property owners/housing partners] pulling back?	We do not see a lot of our housing partners terminating agreements or refusing to renew agreements. On average, we see about one per year that decide to exit the program. Their reasons may include tax credit expiration or desire to increase profits by increasing their market unit count.
		What are the backup plans if tenants are terminated [because property exits the HomeFlex Program]?	Whenever property owners decide to end their partnership with AH and families assisted by AH are affected, we mobilize teams to relocate those families participating in our programs.
		Is there a [true] need for the APS Program?	Unfortunately, there is a greater need for our APS Program than people may know. Ultimately, APS identifies students experiencing homelessness and refers those families to AH for rental assistance. AH issues a voucher and then monitors the impact of that voucher to learn if an issuance helps the family and improves student academic attendance and progress.

AH's 2024 STAKEHOLDERS BRIEFINGS AND PUBLIC HEARING SESSION			
Meeting / Hearing Date	Stakeholder Group	Public Comment	AH Response / Action
Thursday, February 16, 2023	Business and Philanthropy	How are you [AH] tackling the demand side of vouchers with landlords?	AH has a dedicated team to find landlords and a dedicated team to retain landlords. Also, AH reviews policy issues to assure our practices closely align with the market practices. Finally, AH has 24 submarkets that set payments at or close to market rents for those submarket areas, so landlords should not expect to receive substantially less than market rent by participating in our rental programs.
		[I am] glad to see technology is in the 360 Peachtree project.	We thank you for the observation and continued support to close the digital divide.
Thursday, February 23, 2023	Elected/Appointed Officials and HUD Field Office Staff	What [is meant] by other assisted units?	When discussing assisted units, AH counts the units that it directly assists with a monthly subsidy, as well as units that it indirectly assists by virtue of its investment in the project. Therefore, other assisted units can mean units made affordable through tax credits (usually 60% of AMI) or designed in a manner for families at 80% of AMI. There may be other programs or resources that assist the project or units to meet the affordable definition.
		Life Cycle Building Centers, a non-profit, sponsors a "Breaking Barriers through Deconstruction" project and wants to know if there are any opportunities for Life Cycle to recapture and repurpose materials from demolished buildings.	AH does not have many buildings remaining in its portfolio that are planned for demolition. AH works closely with local agencies, like Habitat for Humanity's Re-Store and the Center for Hard to Recycle Materials (CHaRM), whenever possible, to divert reusable materials away from landfills. Although there may not be many opportunities, AH will review its demolition plans and contact Life Cycle as appropriate.

AH's 2024 STAKEHOLDERS BRIEFINGS AND PUBLIC HEARING SESSION			
Meeting / Hearing Date	Stakeholder Group	Public Comment	AH Response / Action
Thursday, February 23, 2023	Elected/Appointed Officials and HUD Field Office Staff	How will AH need Atlanta Public Schools' (APS) support in relation to the Bowen Homes application?	AH will need a letter of support from APS related to education and programming as shown by APS for University Homes. AH may need other support from APS that is unknown right now. AH understands that HUD will conduct site visits between April and May and may announce awardees in September or October. AH will keep APS informed.
		What type of outreach and advocacy is offered to recruit landlords onto the HCV Program?	Currently, AH employs Housing Counselors dedicated to recruiting and retaining property owners to AH's HCV Program. AH supports orientation briefings for new and returning landlords and administers an incentive program to assist program families and "reward" property owners.  Recently, AH designed a Landlord Symposium being held at Loudermilk on March 8.
Thursday, March 2, 2023	Public Hearing	AH is not doing enough to address Atlanta's homeless situation.	AH's housing role is two-fold, in some cases AH leads and other cases AH supports various housing efforts. AH's lead or primary role is to provide rental assistance consistent with the funding terms received from HUD. However, AH has also established programs that support other housing efforts, including homelessness, homeownership, health and housing, self-sufficiency, and others. AH, nor any agency can address Atlanta's homeless situation alone. It takes a collaborative effort between service providers, municipal agencies, and AH.

**AH's 2024 STAKEHOLDERS BRIEFINGS AND PUBLIC HEARING SESSION**

Meeting / Hearing Date	Stakeholder Group	Public Comment	AH Response / Action
Thursday, March 2, 2023	Public Hearing	How can low-income people get on the same level or fix the communities that aren't like high-income communities?	AH works diligently to bring modern, updated multi-family rental communities into its rental assistance portfolio for low-income families to live, work, and play. Further, when adding multi-family communities, AH seeks to add communities located in amenity-rich or emerging areas to ensure low-income families have access to the same or similar amenities as located high-income communities. Finally, AH's revitalization efforts include creating amenity-rich areas for its future redevelopment projects.
		When will you have the new developer for Bowen [Homes] to meet the community?	The redevelopment of Bowen Homes is a joint venture with McCormack Baron Salazar and the Benoit Group. The Bowen Homes redevelopment process includes AH's application for a Choice Neighborhoods Implementation Grant to acquire funding to carry out tasks identified under the Choice Neighborhoods Planning Grant award. HUD's timetable to announce Implementation Grant awards is later this year (September or October timeframe). As AH receives information on its status, AH will facilitate a community meeting with the developers.
		[I] would like for AHA to have supplies in our building. Cosby Spear needs more maintenance workers.	AH appreciates your attendance and comments. AH contracts out the management and maintenance of its properties to third-party entities. AH will confer with its management partners to address your concerns.
		Has an assessment [of Bowen Homes] been done.	AH received a Choice Neighborhoods Planning Grant. Funds from that grant award were used to complete an assessment of Bowen Homes and the neighboring community. Based on results of the assessment, AH applied for a Choice Neighborhoods Implementation Grant to execute tasks in the assessment.

**AH's 2024 STAKEHOLDERS BRIEFINGS AND PUBLIC HEARING SESSION**

Meeting / Hearing Date	Stakeholder Group	Public Comment	AH Response / Action
<p align="center">Thursday, March 2, 2023</p>	<p align="center">Public Hearing</p>	<p>Faithful Homes LLC and Elevated Contracting &amp; Logistics LLC would like to collaborate with Atlanta Housing Authority.</p>	<p>AH is always looking for good partners. Our Senior Vice President that leads our partnership efforts will reach out to you to collect information on whether services meet the needs/requests of our assisted families or the agency.</p>
		<p>How do we bring this to the community and get everyone more involved? Atlanta has a lot of influencers that will love to be a part of this.</p>	
		<p>Are we [AH] looking at CDC and Emory University as [potential partners]?</p>	<p>AH is constantly looking for viable partnerships with local non-profits, such as United Way, Boys &amp; Girls Club, Atlanta Tech, and others to leverage funds and resources to remove barriers and provide services to low-income Atlantans.</p>

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# Appendix C: Requirements of AH's MTW Agreement

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Elements of Legacy Attachment B  
AH's MTW Program Benchmarking Data

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**ELEMENT I. HOUSEHOLDS SERVED**

**Planned Households - By Unit Size**

Community & Program Type	FY 2024 Households by Unit Size					
	0 BRs	1 BRs	2 BRs	3 BRs	4+ BRs	Total
AH-Owned	146	373	25	12	16	572
MIXED	10	1,183	1,021	347	20	2,581
RAD PBV Conversions	144	1,394	648	311	34	2,531
HomeFlex	272	2,997	1,597	261	6	5,133
Housing Choice: Tenant-Based	60	2,481	3,498	2,772	921	9,732
Housing Choice: Ports	1,369	0	0	0	0	1,369
<b>Totals:</b>	<b>2,001</b>	<b>8,428</b>	<b>6,789</b>	<b>3,703</b>	<b>997</b>	<b>21,918</b>

## Appendix C: Elements of Legacy Attachment B

### Planned Households - By Family Size

Community & Program Type	FY 2024 Households by Family Size					
	1 Member	2 Member	3 Member	4 Member	5+ Member	Total
AH-Owned	501	42	10	5	14	572
MIXED	1,520	478	308	168	107	2,581
RAD PBV Conversions	1,637	440	262	121	71	2,531
HomeFlex	3,740	934	275	122	62	5,133
Housing Choice: Tenant-Based	3,188	2,368	1,798	1,203	1,175	9,732
Housing Choice: Ports	276	246	257	286	304	1,369
<b>Totals:</b>	<b>10,862</b>	<b>4,508</b>	<b>2,909</b>	<b>1,905</b>	<b>1,733</b>	<b>21,918</b>

## Appendix C: Elements of Legacy Attachment B

### Planned Households - By Income Group

Community & Program Type	FY 2024 Households by Income Group				
	≤ 30% AMI	31 - 50% AMI	51 - 80% AMI	≥ 81% AMI	Total
AH-Owned	517	47	7	1	572
MIXED	1,923	519	124	15	2,581
RAD PBV Conversions	2,032	393	92	14	2,531
HomeFlex	4,197	812	119	5	5,133
Housing Choice: Tenant-Based	7,141	2,002	538	51	9,732
Housing Choice: Ports	1,369	0	0	0	1,369
<b>Totals:</b>	<b>17,178</b>	<b>3,773</b>	<b>881</b>	<b>86</b>	<b>21,918</b>

	Total ≤ 50% AMI	Total > 50% AMI
	(VLI & ELI Families)	
<b>Number of HHs by Income</b>	20,952	966
<b>% of HHs Served</b>	96%	4%

## Planned Households - By Program/Housing Type and End-of-Year (EOY)

		Household Served Totals				
Community & Program Type	Assistance Type^	FY 2020 Actual	FY 2021 Actual	FY 2022 Actual	FY 2023 EOY Projection	FY 2024 EOY Projection
AH-Owned	PH	1,261	1,261	1,132	798	572
MIXED	PH	1,562	1,562	1,532	1,452	1,060
	RAD PBV	1,503	1,340	1,370	1,913	2,531
	HF	1,358	1,521	1,521	1,521	1,521
	LIHTC	1,088	1,081	1,078	1,081	1,132
HomeFlex	HF	4,803	4,841	5,045	4,997	5,133
	LIHTC	1,585	1,588	1,668	1,588	1,482
Housing Choice: Tenant-Based	HCV	9,393	9,597	9,628	9,597	9,732
Housing Choice: Ports	HCV	1,711	1,745	1,481	1,745	1,369
Housing Choice: Homeownership	HCV	18	17	14	17	12
Homeownership - Other	DPA	1,237	1,498	1,714	1,964	1,958
Short-Term Housing Assistance	MTW	244	295	270	295	295
<b>Totals:</b>		<b>25,763</b>	<b>26,346</b>	<b>26,453</b>	<b>26,968</b>	<b>26,797</b>

<sup>^</sup>**Assistance Type:** PH = Public Housing, RAD PBV = Rental Assistance Demonstration Project-Based Voucher, HF = HomeFlex, LIHTC = Low-Income Housing Tax Credit, HCV = Housing Choice Voucher, DPA = Down Payment Assistance, MTW = Moving-to-Work

**Note:** AH's Comprehensive Homeownership Program provides eligible, first-time homebuyers with down payment assistance (DPA) to make homeownership attainable for low-income families. AH's DPA is a subordinate lien on the property that AH records in the county public records. The loan is forgivable at maturity and AH will reconcile mature or paid off loans to record a "cancellation of lien" in the public records. This action will reduce AH's overall DPA roll and affect AH's household served numbers. AH will reflect changes in its MTW Annual Report as confirmation of reconciled maturity dates and lien releases become recorded.

### ELEMENT II. OCCUPANCY POLICIES

In general terms, AH codifies this information in its Statement of Corporate Policies (SCP), which is located on our website at <https://www.atlantahousing.org/about-us/plans-reports/>. You may contact our Policy Research Director at [lenny.koltochnik@atlantahousing.org](mailto:lenny.koltochnik@atlantahousing.org) with specific questions.

### ELEMENT III. CHANGES IN HOUSING STOCK

AH is undergoing a repositioning of its public housing stock by converting public housing units to long-term Section 8 project-based voucher assisted units under the Rental Assistance Demonstration (RAD) Program. AH submits inventory information to HUD each month via the Public and Indian Housing Information Center (PIC).

### ELEMENTS IV AND V. SOURCES AND AMOUNTS OF FUNDING AND USES OF FUNDS

AH is required to submit funding information in the prescribed Financial Data Schedule (FDS) format through the Financial Assessment System – PHA (FASPHA) by August 31 annually.

### ELEMENT VI. CAPITAL PLANNING

AH includes an overview of actual capital expenditures, please **see page 39** of this document. Detailed information is included in our Annual Operating Budget and Comprehensive Annual Financial Report (CAFR).

### ELEMENT VII. MANAGEMENT INFORMATION FOR OWNED/MANAGED UNITS

Under this element, AH set a number of guidelines for its rental and housing assistance programs owned or managed by AH. Attachment D of AH's Amended and Restated MTW Agreement lists these guidelines, collectively referred to as MTW Program Benchmarks. AH provides planned performance of its MTW Program Benchmarks, please **see page 111** of this document. Further, AH plans to revisit these benchmarks during the fiscal year to update the measurable outcomes as appropriate.

#### A. Security

AH continues to address crime and safety in its wholly owned communities and in other communities where assisted residents are in third-party owned properties, through collaborative strategies with local law enforcement, neighbors, private development partners, property management developers (PMDs) and residents. Strategies taken to combat criminal elements in and around AH and third-party owner communities may include:

- The provision of a security presence via concierge and staff within AH-Owned properties.
- Video surveillance and a community security channel.
- Best practice and lessons learned with the Atlanta Police Department (APD) to deter crime and enhance safety and security.
- Continued utilization of criminal screening standards and processes joined with stricter lease enforcement.
- Routine preventative maintenance tasks and making repairs and upgrades as necessary to ensure safety equipment remains operational.
- Security protocols advanced by third-party owners

### ELEMENT VIII. MANAGEMENT INFORMATION FOR LEASED HOUSING

#### A. Leasing Information

AH is required to submit funding information in the prescribed Financial Data Schedule (FDS) format through the Financial Assessment System – PHA (FASPHA) by August 31 annually.

### B. Inspections Strategy

#### **AH Reviews of AH-Owned Communities**

Focused on providing and maintaining quality living environments throughout its real estate portfolio, AH provides an integrated assessment status of each property and works closely with its property management developer (PMD) partners to identify and address concerns at the properties. Elements of AH's quality assurance program are as follows:

- (1) **Uniform Physical Conditions Standards (UPCS):** AH conducts UPCS quality assurance inspections annually at each property. An inspection of all common areas, all building systems, and a random selection of five percent of the units is completed. The inspections contribute to a reduction of systemic maintenance issues and an overall improvement in the physical condition of the communities.
- (2) **Elevator:** AH'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. Regular equipment maintenance has led to improved operational up time and a 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 program termination. The findings from RIM help in the design of staff training, which in turn, has reduced the number of errors identified.
- (4) **Procurement/Contracts:** AH 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:** AH conducts/requires an annual inspection at each property for administrative, technical, and physical security systems that enable PMDs to identify and mitigate safety concerns at the communities. The inspection also includes items in accordance with AH's Risk/Safety, which complies with the Insurer's Work Plan instituted by AH's liability insurance company. Because of AH's Risk/Safety Program, AH insurance premiums have been reduced.
- (7) **Accessibility:** AH conducts annual and as needed inspections at each AH-owned property to assure community compliance with applicable Fair Housing and accessibility statutes, HUD guidelines, and AH's related policies and procedures. These inspections enable AH to have early detection and resolution of accessibility concerns, identify process improvements, and identify topics for staff training.

#### **AH Reviews of Mixed and HomeFlex Communities**

AH has worked to streamline and enhance the compliance review process by utilizing audits, inspections, and compliance reviews conducted by other agencies and compliance contractors. AH conducts the following reviews for the Mixed and HomeFlex Communities:

- (1) **Business Process Reviews (BPRs):** AH conducts an annual Business Process Review at all mixed-income and HomeFlex communities, which includes a review of the property operations and a physical review of randomly selected resident files. The primary purpose of the review is to confirm that site-based administration activities comply with legal agreements defining the obligation of the owner entities and professional property management companies, AH policies, and federal requirements with respect to the administration and maintenance of the site-based waiting list, property operations, enforcement of AH's Work Requirement, rent determination findings, and accessibility requirements by agreement. Through BPRs, AH has been able to strengthen internal controls and external oversight of property performance related to defined measures above.

## Appendix C: Elements of Legacy Attachment B

(2) **Financial:** AH reviews audited financial statements of mixed-income communities to identify trends that may affect the long-term financial viability and sustainability of the underlying asset. When there are growing concerns, impairments, audit findings, or material adverse changes that may influence the ability to meet obligations, AH works with the owner to develop a corrective action plan to resolve concerns or deficiencies as necessary.

### ELEMENT IX. RESIDENT PROGRAMS

AH offers residents and voucher-holders access to a variety of programs designed to increase program participants' economic independence and housing self-sufficiency through administration of its Human Development Services (HDS) business unit. This AH business unit works to link program participants with appropriate supportive services.

### ELEMENT X. OTHER INFORMATION AS REQUIRED

AH is not required to provide any other information during this planning year.

### MTW PROGRAM BENCHMARKS

AH captures outcome details of this element in its MTW Annual Report.

Measurable Outcome	MTW Program Benchmarks					
	Baseline	FY 2023	FY 2024	FY 2025	FY 2026	FY 2027
<b>Public Housing Program</b>						
• % Rents Uncollected	2%	≤ 2%	≤ 2%	≤ 2%	≤ 2%	≤ 2%
• Occupancy Rate	98%	≥ 98%	≥ 98%	≥ 98%	≥ 98%	≥ 98%
• Emergency Work Orders Completed or Abated in < 24 hours	99%	≥ 99%	≥ 99%	≥ 99%	≥ 99%	≥ 99%
• Routine Work Orders Completed in < 30 Days	5 Days	100%	100%	100%	100%	100%
• % Planned Inspections Completed	100%	100%	100%	100%	100%	100%
<b>Housing Choice Program (Section 8)</b>						
• Budget Utilization Rate	98%	≥ 98%	≥ 98%	≥ 98%	≥ 98%	≥ 98%
• % Planned Annual Inspections Completed	98%	≥ 98%	≥ 98%	≥ 98%	≥ 98%	≥ 98%
• Quality Control Inspections	≥ 1.4%	≥ 1.4%	≥ 1.4%	≥ 1.4%	≥ 1.4%	≥ 1.4%
<b>Community and Support Services</b>						
• Resident Homeownership	6	3	4	6	7	9
• Resident Workforce Participation	6,415	8,576	8,581	8,586	8,591	8,595
<b>Finance</b>						
• Project-Based Financing Closings	N/A	11	6	6	6	6



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## **Appendix D: Lobbying Disclosure**

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Form 50071 or SF-LLL as applicable

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OMB Approval No. 2577-0157 (Exp. 11/30/2023)

**Certification of Payments to Influence Federal Transactions**

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

Public reporting burden for this information collection is estimated to average 30 minutes. This includes the time for collecting, reviewing, and reporting data. The information requested is required to obtain a benefit. This form is used to ensure federal funds are not used to influence members of Congress. There are no assurances of confidentiality. HUD may not conduct or sponsor, and an applicant is not required to respond to a collection of information unless it displays a currently valid OMB control number.

Applicant Name

The Housing Authority of Atlanta, Georgia

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-L.L.L., 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

Eugene E. Jones, Jr.

Title

President and Chief Executive Officer

Signature

Date (mm/dd/yyyy)

03/10/2023

Previous edition is obsolete

form HUD 50071 (01/14)

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## Appendix E: Other Information

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Local Asset Management Plan (LAMP)  
Planned Disposition/Demolition Applications  
RAD Unit Conversion Details

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### Background and Information

AH's Amended and Restated Moving to Work Agreement (MTW Agreement), effective as of November 13, 2008, and as further amended by the Second Amendment effective January 16, 2009, and as extended by Congress to June 30, 2028 and confirmed by HUD on April 14, 2016, authorizes AH to design and implement a Local Asset Management Plan (LAMP) 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 LAMP 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 of the MTW Agreement, AH agreed to describe its cost accounting plan as part of its LAMP, including how the indirect cost fee for service rate is determined and applied.

### Project-Based Approach for Public Housing Program

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

In addition, each mixed-income, mixed-finance 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. AH maintains a separate budget and accounting for the operating subsidy paid to the owners of these mixed communities, but does not maintain the accounting for property operations as AH does not own or operate these properties.

### Identification of Cost Allocation Approach

AH approaches its cost allocation plan with consideration to the entire operation of AH, 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 AH operations, as well as the specific information required for the MTW Program

Under the MTW Agreement, the cost accounting options available to AH include either a "fee-for-service" methodology or an "indirect cost rate" methodology. AH can establish multiple cost objectives or a single cost objective for its MTW Program. AH 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 LAMP are utilized for determining direct and indirect costs charged to the cost objectives.



### Definitions:

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

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

**Indirect Costs** – costs that (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 result 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 costs to be allocated to the benefitted costs objectives.

**Indirect Cost Fee-for-Service Rates** – 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** – 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.

### AH Cost Objectives

AH has identified the following cost objectives:

#### **Direct Costs:**

**MTW Program** – 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 AH's MTW Agreement and Annual MTW Plan.

**Revitalization Program** – includes the development related activity funded from Choice Neighborhoods, other Federal grants, or local funds. Generally, AH 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** – such vouchers include, but are not limited to, Family Unification Program (FUP) vouchers, Veterans Affairs Supportive Housing (VASH) Vouchers, 1-year Mainstream (Non-Elderly Disabled (NED)) Vouchers, Emergency Housing Vouchers, and 5-year Mainstream (Section 811) Vouchers.

**Other Federal, State, and Local Awards** – Periodically, AH may receive other funding awards, and in these instances, AH will establish a separate cost objective for such awards, as necessary.

**Non-Federal Program** – this category relates to entrepreneurial activities, some AH Affiliate/Component Units and National Housing Compliance, Inc., which are separate cost objectives, grants, gifts, non-federal awards and/or contracts, and other initiatives that do not derive from the use of federal funds.

### AH Direct Costs

AH defines direct costs in conjunction with the cost objectives defined in this Cost Allocation Plan. Under 2 CFR §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 AH HomeFlex (AH's Project-Based Rental Assistance Program) 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. AH costs for administering Housing Choice Tenant-Based Voucher Rental Assistance Program, including inspection activities,
7. Operating costs directly attributable to operating AH-Owned properties,
8. Capital improvement costs at AH-Owned properties,
9. Operating subsidies paid to Mixed Communities,
10. AH costs associated with managing AH-Owned communities, HomeFlex, Housing Choice Homeownership Vouchers, Mixed Communities, and other AH-Owned real estate,
11. AH costs directly attributable to MTW Program activities, including the administration of human development and supportive services programs,
12. AH costs associated with development and revitalization activities with costs as defined in the next section, but paid using MTW Single Fund flexibility, and
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 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 such as loans, grants, etc., and
13. Other development and revitalization expenditures.

## Appendix E: Local Asset Management Plan

**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 AH receives awards.

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

1. Legal expenses,
2. Professional services,
3. Utilities, such as gas, water, electric and similar utility service expenses,
4. Real Estate taxes,
5. Insurance,
6. Bank charges,
7. Staff training,
8. Interest expense, and
9. Other costs required of a specific non-federal program, award, or contract.

### Direct Costs – Substitute System for Compensation of Personal Services

In addition to the direct costs identified previously, when required to charge direct staff time to a non-MTW funding source, AH 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 §200.430. The substitute system permits AH to allocate direct costs on measures that are readily determined for each department more efficiently and effectively. Those departments and measures will be re-evaluated periodically and updated as necessary. The Operating Divisions functions and measures are listed below:

Operating Division	Quantifiable Measure
Facilities and Operations Management	<ul style="list-style-type: none"> <li>• Square footage of properties managed</li> </ul>
Housing Choice Voucher Program	<ul style="list-style-type: none"> <li>• Leased vouchers</li> </ul>
Inspection Services	<ul style="list-style-type: none"> <li>• Number of inspections</li> </ul>
Real Estate Group	<ul style="list-style-type: none"> <li>• Active revitalizations</li> <li>• Number of properties managed</li> <li>• Number of properties and developments supported</li> <li>• RAD Conversions</li> </ul>

### AH Fee-For-Service

Corporate Support consists of administrative and support departments that support the Operating Divisions and AH as a whole. AH establishes a Fee-for-Service Rate based on the anticipated indirect costs 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 charged to program not funded by the MTW Single Fund. Based on current budget estimates, AH projects the indirect cost fee to be approximately 11% of total direct costs.

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

#### **Implementation of AH's Local Asset Management Plan**

AH began accounting for costs under this LAMP 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 AH's property management systems**

AH has the ability to define costs differently than the standard definitions published in HUD's Financial Management Guidebook pertaining to the implementation of 24 CFR Part 990. AH is required to describe any differences between the LAMP 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 information to HUD:

1. AH 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 AH's comprehensive operation that includes other program and business activities. AH's MTW Program is much broader than Public Housing properties and includes activities not found in traditional HUD Programs. This LAMP addresses the entire AH operation.
2. AH defined its cost objectives at a different level than HUD's asset management system. Specifically, AH defined the MTW Program as a cost objective that is consistent with the issuance of the assistance listings 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 under this LAMP.

## Appendix E: Planned Disposition/Demolition Applications

<b>In-Progress Special Applications Center (SAC) Submissions</b>			
Property/Parcel Name*	Proposed Action	Property/Parcel Name*	Proposed Action
Englewood IA	Disposition	West Highlands – 3B South	Disposition
Englewood IB	Disposition	Further Leveraged Parcels	Disposition
Magnolia Perimeter ANDP	Disposition	<ul style="list-style-type: none"> <li>• Capitol On-Site and Off-Site Vacant Parcels</li> </ul>	Disposition Details Available by Request
Mechanicsville Homeownership	Disposition	<ul style="list-style-type: none"> <li>• Carver On-Site and Off-Site Vacant Parcels</li> </ul>	
Scholars Landing Homeownership – Phase V	Disposition	<ul style="list-style-type: none"> <li>• Grady On-Site and Off-Site Vacant Parcels</li> </ul>	
		<ul style="list-style-type: none"> <li>• Harris On-Site and Off-Site Vacant Parcels</li> </ul>	

<b>Planned SAC Submissions: 2024</b>			
Bowen Homes	Disposition	Jonesboro North	Disposition
Civic Center	Disposition	Jonesboro South	Disposition
Cosby Spear Highrise	RAD Section 18 Disposition	Magnolia Perimeter Citiplace	Disposition
Cupola Building at Centennial	Disposition	Magnolia Perimeter Quest/Westside Future Fund	Disposition
Englewood IC & IIC	Disposition	Scholars Landing Outparcels	Disposition
Englewood Storm Water	Disposition	West Highlands – 2000 Perry	Disposition

<b>Future SAC Submissions: 2025 - 2029</b>			
Bankhead Courts	Disposition	Leila Valley	Disposition
Englewood IIB	Disposition	Palmer House	Disposition
Johnson Road/ Quarry Park	Demolition	North Avenue (a.k.a. SoNo 301)	Disposition

*\*Listed alphabetically, not by priority or timeline.*

AH may seek to acquire parcels under its co-investment program that complement its revitalization activities. Such acquisitions may require disposition under a long-term ground lease to the development partnership.

Appendix E: RAD Unit Conversion Details

PLANNED RAD CONVERSIONS: 2024

Name	PIC Dev ID	Conversion Type	Transfer of Assistance / RAD Section 18 Blend
Cosby Spear	GA006000241	PBV	No/Yes
Total Units	Pre-RAD Unit Type	Post-RAD Unit Type	Capital Fund Allocation
282	Near Elderly, Elderly and Non-Elderly Disabled	Near Elderly, Elderly and Non-Elderly Disabled	\$831,595
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 / RAD Section 18 Blend
Villages at Carver II	GA006000880	PBV	TBD
Total Units	Pre-RAD Unit Type	Post-RAD Unit Type	Capital Fund Allocation
33	Mixed Income Family	Mixed Income Family	\$68,661
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

Appendix E: RAD Unit Conversion Details

PROJECTED RAD CONVERSIONS: 2025 - 2029

Name	PIC Dev ID	Conversion Type	Transfer of Assistance / RAD Section 18 Blend
Ashley Auburn Pointe	GA006001080	PBV	TBD
<b>Total Units</b>	<b>Pre-RAD Unit Type</b>	<b>Post-RAD Unit Type</b>	<b>Capital Fund Allocation</b>
54	Mixed Income Family	Mixed Income Family	\$102,672

Name	PIC Dev ID	Conversion Type	Transfer of Assistance / RAD Section 18 Blend
Ashley Auburn Pointe II	GA006001110	PBV	TBD
<b>Total Units</b>	<b>Pre-RAD Unit Type</b>	<b>Post-RAD Unit Type</b>	<b>Capital Fund Allocation</b>
51	Mixed Income Family	Mixed Income Family	\$90,122

Name	PIC Dev ID	Conversion Type	Transfer of Assistance / RAD Section 18 Blend
Ashley Cascade I	GA006000830	PBV	TBD
<b>Total Units</b>	<b>Pre-RAD Unit Type</b>	<b>Post-RAD Unit Type</b>	<b>Capital Fund Allocation</b>
46	Mixed Income Family	Mixed Income Family	\$91,584

Name	PIC Dev ID	Conversion Type	Transfer of Assistance / RAD Section 18 Blend
Ashley Cascade II	GA006000870	PBV	TBD
<b>Total Units</b>	<b>Pre-RAD Unit Type</b>	<b>Post-RAD Unit Type</b>	<b>Capital Fund Allocation</b>
41	Mixed Income Family	Mixed Income Family	\$83,087

Name	PIC Dev ID	Conversion Type	Transfer of Assistance / RAD Section 18 Blend
Ashley Cascade III	GA006000900	PBV	TBD
<b>Total Units</b>	<b>Pre-RAD Unit Type</b>	<b>Post-RAD Unit Type</b>	<b>Capital Fund Allocation</b>
29	Mixed Income Family	Mixed Income Family	\$56,370

Name	PIC Dev ID	Conversion Type	Transfer of Assistance / RAD Section 18 Blend
Ashley CollegeTown I	GA006000930	PBV	No/Yes
<b>Total Units</b>	<b>Pre-RAD Unit Type</b>	<b>Post-RAD Unit Type</b>	<b>Capital Fund Allocation</b>
78	Mixed Income Family	Mixed Income Family	\$143,291

## Appendix E: RAD Unit Conversion Details

### PROJECTED RAD CONVERSIONS: 2025 - 2029

Name	PIC Dev ID	Conversion Type	Transfer of Assistance / RAD Section 18 Blend
Ashley CollegeTown II	GA006001090	PBV	TBD
<b>Total Units</b>	<b>Pre-RAD Unit Type</b>	<b>Post-RAD Unit Type</b>	<b>Capital Fund Allocation</b>
70	Mixed Income Family	Mixed Income Family	\$125,542

Name	PIC Dev ID	Conversion Type	Transfer of Assistance / RAD Section 18 Blend
Ashley Terrace at West End	GA006000840	PBV	TBD
<b>Total Units</b>	<b>Pre-RAD Unit Type</b>	<b>Post-RAD Unit Type</b>	<b>Capital Fund Allocation</b>
34	Mixed Income Family	Mixed Income Family	\$59,915

Name	PIC Dev ID	Conversion Type	Transfer of Assistance / RAD Section 18 Blend
Atrium at CollegeTown	GA006001030	PBV	TBD
<b>Total Units</b>	<b>Pre-RAD Unit Type</b>	<b>Post-RAD Unit Type</b>	<b>Capital Fund Allocation</b>
76	Mixed Income Senior	Mixed Income Senior	\$120,838

Name	PIC Dev ID	Conversion Type	Transfer of Assistance / RAD Section 18 Blend
Capitol Gateway II	GA006000990	PBV	TBD
<b>Total Units</b>	<b>Pre-RAD Unit Type</b>	<b>Post-RAD Unit Type</b>	<b>Capital Fund Allocation</b>
49	Mixed Income Family	Mixed Income Family	\$83,411

Name	PIC Dev ID	Conversion Type	Transfer of Assistance / RAD Section 18 Blend
Capitol Gateway III	GA006000970	PBV	TBD
<b>Total Units</b>	<b>Pre-RAD Unit Type</b>	<b>Post-RAD Unit Type</b>	<b>Capital Fund Allocation</b>
89	Mixed Income Family	Mixed Income Family	\$162,158

Name	PIC Dev ID	Conversion Type	Transfer of Assistance / RAD Section 18 Blend
Cheshire Bridge Road Highrise	GA006000470	PBV	TBD
<b>Total Units</b>	<b>Pre-RAD Unit Type</b>	<b>Post-RAD Unit Type</b>	<b>Capital Fund Allocation</b>
162	Near Elderly, Elderly and Non-Elderly Disabled	Housing for Elderly Persons	\$515,390



## Appendix E: RAD Unit Conversion Details

### PROJECTED RAD CONVERSIONS: 2025 - 2029

Name	PIC Dev ID	Conversion Type	Transfer of Assistance / RAD Section 18 Blend
Georgia Avenue Highrise	GA006000250	PBV	TBD
Total Units	Pre-RAD Unit Type	Post-RAD Unit Type	Capital Fund Allocation
81	Near Elderly, Elderly and Non-Elderly Disabled	Housing for Elderly Persons	\$259,381

\*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 / RAD Section 18 Blend
Magnolia Park I	GA006000820	PBV	TBD
Total Units	Pre-RAD Unit Type	Post-RAD Unit Type	Capital Fund Allocation
87	Mixed Income Family	Mixed Income Family	\$159,177

Name	PIC Dev ID	Conversion Type	Transfer of Assistance / RAD Section 18 Blend
Magnolia Park II	GA006000860	PBV	TBD
Total Units	Pre-RAD Unit Type	Post-RAD Unit Type	Capital Fund Allocation
73	Mixed Income Family	Mixed Income Family	\$135,803

Name	PIC Dev ID	Conversion Type	Transfer of Assistance / RAD Section 18 Blend
Marian Road Highrise	GA006000520	PBV	TBD
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	\$771,188

Name	PIC Dev ID	Conversion Type	Transfer of Assistance / RAD Section 18 Blend
Martin Street Plaza	GA006000560	PBV	TBD
Total Units	Pre-RAD Unit Type	Post-RAD Unit Type	Capital Fund Allocation
59	Family	Family	\$242,804

Appendix E: RAD Unit Conversion Details

PROJECTED RAD CONVERSIONS: 2025 - 2029

Name	PIC Dev ID	Conversion Type	Transfer of Assistance / RAD Section 18 Blend
The Gardens at CollegeTown	GA006001070	PBV	TBD
<b>Total Units</b>	<b>Pre-RAD Unit Type</b>	<b>Post-RAD Unit Type</b>	<b>Capital Fund Allocation</b>
26	Mixed Income Family	Mixed Income Family	\$35,464

Name	PIC Dev ID	Conversion Type	Transfer of Assistance / RAD Section 18 Blend
Veranda at Auburn Pointe	GA006001040	PBV	TBD
<b>Total Units</b>	<b>Pre-RAD Unit Type</b>	<b>Post-RAD Unit Type</b>	<b>Capital Fund Allocation</b>
38	Mixed Income Family	Mixed Income Family	\$58,389

Name	PIC Dev ID	Conversion Type	Transfer of Assistance / RAD Section 18 Blend
Villages at Carver III	GA006000910	PBV	TBD
<b>Total Units</b>	<b>Pre-RAD Unit Type</b>	<b>Post-RAD Unit Type</b>	<b>Capital Fund Allocation</b>
108	Mixed Income Family	Mixed Income Family	\$208,524

Name	PIC Dev ID	Conversion Type	Transfer of Assistance / RAD Section 18 Blend
Villages at Carver V	GA006001020	PBV	TBD
<b>Total Units</b>	<b>Pre-RAD Unit Type</b>	<b>Post-RAD Unit Type</b>	<b>Capital Fund Allocation</b>
78	Mixed Income Family	Mixed Income Family	\$142,443

Name	PIC Dev ID	Conversion Type	Transfer of Assistance / RAD Section 18 Blend
Westminster	GA006000440	PBV	TBD
<b>Total Units</b>	<b>Pre-RAD Unit Type</b>	<b>Post-RAD Unit Type</b>	<b>Capital Fund Allocation</b>
32	Family	Family	\$111,843

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