



Atlanta Housing Authority

FY 2015

MTW Annual

Implementation Plan

For Fiscal Year Beginning July 1, 2014

Board Approved

April 3, 2014

AHA's Mission

Board of Commissioners

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Vision

Healthy Mixed-Income Communities; Healthy Self-Sufficient Families

Mission

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

Goals

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

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



Guiding Principles

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

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

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Message from the Board of Commissioners



Daniel J. Halpern
Chairman
Board of Commissioners

The Board of Commissioners is proud to join interim President and CEO Joy Fitzgerald in presenting the 2015 MTW Annual Plan. Through talent, technology and tenacity, CEO Fitzgerald and her excellent team are building an increasingly efficient AHA that delivers services more effectively and at lower cost.

Reducing costs is one of our primary goals, because lower administrative costs translate into more funds available for housing and services for the residents that AHA exists to serve.

Joy's team is effectively shifting resources into new technology and streamlined service delivery, into new investments for senior citizens in our high-rises, for the homeless in desperate need of housing, and for all our residents who deserve a shot at training, work and independence.

We're proud of our progress, and confident that our 2015 planning and programming will serve our families and the entire Atlanta community.

Message from the President & CEO



Joy W. Fitzgerald
Interim President & CEO

The Atlanta Housing Authority is proud to present its 2015 Moving to Work Annual Plan to our partners and supporters.

For many years now, AHA has stood at the forefront of innovative ways to provide high-quality housing for low-income families. This year's annual plan builds on that tradition.

As you'll see in the pages that follow, AHA is focused not only on improving and strengthening existing housing opportunities, but creating new ones as well. As a finalist for a Choice Neighborhoods Implementation Grant, AHA is excited about the opportunity to spark new housing, stronger schools and quality retail and amenities in historic neighborhoods surrounding the Atlanta University Center.

The range of services we intend to offer our families is just as ambitious. AHA's record of creating self-sufficient families in mixed-income communities will now be applied to participants in the Housing Choice voucher program, with the goal of providing the services necessary to foster independence among all our families.

Finally, fiscal year 2015 will see an increased focus on supportive housing as we partner with non-profit agencies and the City of Atlanta to provide housing opportunities for families who are homeless or at risk of homelessness.

We won't rest on our laurels at AHA. We will continue a tradition of providing quality housing for low-income families and individuals, while providing the services and support they need to climb the rungs of success and independence.

Background on Moving to Work

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

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

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

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

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

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

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



In 2004, AHA submitted to HUD its first long-term strategic Business Plan, using this new statutory and regulatory framework (herein referred to as the “Business Plan”). AHA’s Business Plan and its subsequent annual MTW implementation plans on a cumulative basis outline AHA’s priority projects, activities, and initiatives to be conducted during each fiscal year. Fiscal Year 2015 represents AHA’s twelfth year of participation in the MTW Demonstration.

AHA's Lines of Business

Housing Opportunities

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

Human Development Services

Through its network of strategic partners, service providers, and community stakeholders, AHA facilitates the provision of supportive services -- including employment services and training, educational services, disability services, life skills training, homeownership counseling, childcare, mental health services and senior supportive services -- leading to success and progression to the mainstream.

Section I.

Executive Summary

With the goal to provide quality affordable housing seamlessly in healthy mixed-income communities, AHA leverages all its assets—land, MTW flexibility, know-how, access to funds, partnerships, goodwill—to create amenity-rich, quality housing opportunities for low-income families in Atlanta.

Over the last 20 years AHA has successfully built sustainable communities while assisting thousands of families along the path to self-sufficiency. AHA transformed its business model and corporate structure for providing affordable housing resources. In the last three years AHA began implementing streamlined business processes and modernized systems to support AHA’s business model. AHA plans to complete the balance of the implementation in FY 2015.

AHA, in its entirety, will focus on key priorities that align with AHA’s goals and objectives and that are designed to address unique local challenges. Many of these multi-year activities were identified and approved by HUD in previous AHA MTW Annual Plans and constitute “ongoing activities” under its MTW authority. AHA is not proposing any new initiatives in FY 2015.

The key priorities for FY 2015 are listed below and are described in greater detail in Section II.

- 5. Advance AHA’s Real Estate initiatives and expand housing opportunities.**
 - a. Advance the master plans for mixed-use, mixed-income communities.
 - b. Advance real estate development initiatives.
 - c. Expand housing opportunities utilizing PBRA assistance and the Housing Choice tenant-based program.
 - d. Implement conversion (reformulation) demonstration for Centennial Place.
 - e. Expand supportive housing and homelessness initiatives.
 - f. Reposition AHA-Owned Residential Communities in partnership with new property management and real estate development firms.
- 6. Advance AHA’s Human Development initiatives.**
- 7. Complete the business transformation and integrated Enterprise Resource Planning initiative.**
- 8. Initiate a long-term strategic real estate and human development plan.**

Section II.

FY 2015 Enterprise Priorities

AHA continues to exercise its full MTW flexibility and will continue its focus on implementing initiatives begun in previous years. FY 2015 priority activities are described and aligned with the MTW statutory goals. Other ongoing activities previously approved by HUD and operationalized by AHA are described in Section IV – Appendix C.

Priority		AHA Goals / MTW Statutory Goals		
		1	2	3
1	Advance AHA's Real Estate initiatives and expand housing opportunities.	*		*
2	Advance AHA's Human Development initiatives.		*	*
3	Complete the business transformation and integrated Enterprise Resource Planning initiative.			*
4	Initiate a long-term strategic real estate and human development plan.			*

Legend:

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

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

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

Priority 1:

Advance AHA's Real Estate Initiatives

FY 2015 FOCUS: Improve the long-term sustainability of mixed-income communities while facilitating expanded housing opportunities.

In FY 2015, AHA will continue to expand housing opportunities using its various real estate initiatives, public/private partnerships and resources, and MTW flexibility to increase households served. In addition to its 16 Master-Planned mixed-use, mixed-income communities, AHA will invest in quality of life improvements at its eleven senior high-rises and two family properties. AHA will also continue to use its Project Based Rental Assistance program for incenting private-sector developers and owners to facilitate the development of additional quality mixed-income communities, as well as to provide quality supportive housing with intensive support services. AHA will use its Housing Choice tenant-based voucher program to facilitate housing opportunities in economically integrated neighborhoods.

AHA's Community-Building Vision and Real Estate Development Approach

With the goal to **create market-quality, mixed-use, mixed-income, amenity-rich communities**, AHA employs a combination of strategies including the following:

1. Major revitalization using HUD funds as seed capital and AHA-owned land as equity to attract private-sector developer participation, private investment and stakeholder partnerships;
2. Major revitalization using Project Based Rental Assistance and the value of AHA-owned land as equity to attract private-sector developer participation and private investment in new construction or rehabilitation as well as stakeholder partnerships;
3. Sale of AHA-owned land (including land swaps);
4. Land banking; and/or
5. Acquisitions



Acquisitions – In support of the master plan developments, AHA has acquired a number of parcels of improved and unimproved real estate in neighborhoods that surround new revitalized communities. In FY 2015, AHA and its development partners will continue preliminary work related to the repurposing of these properties to align with the respective Master Plans and may seek funding to support these development activities. Subject to funding availability, AHA will continue to engage in acquisition activity during FY 2015 as necessary to support the existing Master Plans and long-term community sustainability. A listing of properties owned by AHA is included in Appendix D.

In support of neighborhood stabilization, AHA may acquire sites near other AHA-owned properties not subject to a master plan for redevelopment.

Proposed Land Transactions and Sale of Assets – In addition to property acquisitions, AHA may be engaged in negotiations of land transactions with a number of entities to further support its revitalization efforts at the communities listed in Table 1.

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

Since 1995, AHA and its private sector partners have successfully created quality, mixed-use, mixed-income communities with an economic impact to date of approximately \$2 billion. As the real estate and financial markets strengthen, AHA and its development partners will continue to engage in real estate activities and advance the community sustainability aspects of the Master Plans. These strategies are intended to ensure the long-term sustainability and stability of the communities, and the families' progress toward self-sufficiency. Most of these additional aspects will be developed using non-HUD funds.

Elements of the HUD-approved revitalization plans will be advanced during FY 2015 subject to market demand, financial feasibility, funding availability, and conditions in the financial and real estate markets. The revitalization activities proposed for implementation during FY 2015 are described in Table 1.

Table 1: Revitalization Activities Planned for FY 2015

<p>Auburn Pointe (Grady Homes Revitalization, includes the revitalization of Antoine Graves Highrise and Antoine Graves Annex) <i>Grady Redevelopment, LLC: Integral Development, LLC, Urban Realty Partners, LLC</i></p> <ul style="list-style-type: none"> • Continue to remediate and demolish the structures on acquired properties to further long-term sustainability. • Update the Master Plan and may explore updates to revitalization plan. • Promote public school improvements and early childhood learning centers in partnership with stakeholders. • Continue to explore acquisitions and other opportunities within the Master Plan area to further long-term sustainability.
<p>Capitol Gateway (Capitol Homes Revitalization) <i>Capitol Gateway, LLC: Integral Development, LLC, Urban Realty Partners, LLC</i></p> <ul style="list-style-type: none"> • Continue land swap negotiation with State of Georgia for contiguous parcel. • Continue to remediate and demolish the structure on acquired properties to further long-term sustainability. • Update the Master Plan and may explore updates to revitalization plan. • Continue to explore acquisitions and other opportunities within the Master Plan area to further long-term sustainability.
<p>The Villages at Carver (Carver Homes Revitalization) <i>Carver Redevelopment, LLC: Integral Development, LLC, H.J. Russell and Company</i></p> <ul style="list-style-type: none"> • Continue development of retail sites. • Continue negotiations with Atlanta-Fulton Public Library System for land sale. • Update the Master Plan and may explore updates to revitalization plan. • Promote public school improvements and early childhood learning centers in partnership with Integral, H.J. Russell, YMCA and foundation stakeholders. • Continue to explore acquisitions and other opportunities within the Master Plan area to further long-term sustainability.
<p>Centennial Place (Techwood/Clark Howell Revitalization) <i>Integral Partnership of Atlanta: The Integral Group, LLC, McCormack Baron & Associates</i></p> <ul style="list-style-type: none"> • Facilitate public improvements on Centennial Place North parcel. • Cupola Building under consideration for rental housing. • May adaptively reuse the Zell Miller Building in support of the human development strategy. • Update the Master Plan and may explore updates to revitalization plan. • Reformulation Demonstration: With allocation of Low Income Housing Tax Credits, will close and implement redevelopment(s) on Phase I. May submit application for LIHTC for redevelopment of future phases.

Centennial Place *Cont'd*

- Maintain active involvement in the repositioning of Centennial Place School into a premier grades K-8 STEAM (Science, Technology, Engineering, Arts and Mathematics) school supported by a top-rated Cradle-K program. As member of the Governing Board and its operating committees and as landlord, development partner and community stakeholder, AHA is a major partner in the continued revitalization of Centennial Place and the adjacent neighborhoods.
- To facilitate this major school and community revitalization effort, AHA may enable the sub-lease of a portion of its property, along with certain use-easement rights, to be used for temporary accommodations until the new permanent facilities are completed in approximately three years. Additionally, AHA may dispose of land currently utilized by Centennial Place School for green space under an easement to allow for permanent improvements to be made.

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

- Update the Master Plan and may explore updates to revitalization plan.
- Promote public school improvements and invest in early childhood learning centers in partnership with Atlanta Public Schools, YMCA and other stakeholders.
- Continue to explore acquisitions and other opportunities within the Master Plan area to further long-term sustainability.

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

- Close transaction and ground lease and begin development of 75 scattered-site affordable rental units.
- Update the Master Plan and may explore updates to revitalization plan.
- Promote public school improvements and early childhood learning centers in partnership with stakeholders.
- Continue to explore acquisitions and other opportunities within the Master Plan area to further long-term sustainability.

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

- Public improvements for future development of 154 for-sale homes.
- Complete 10 for-sale affordable homes, and additional market-rate homes.
- Update the Master Plan and may explore updates to revitalization plan.
- Promote development of K-8 charter school within the West Highlands Master Plan area, which may include disposition of land.
- Continue to explore acquisitions and other opportunities within the Master Plan area to further long-term sustainability.

Scholars Landing (University Homes Revitalization) *Integral Partnership of Atlanta: The Integral Group, LLC*

- Closed transaction to construct 60-unit affordable assisted-living community and begin vertical construction. It will be the first 100% affordable assisted-living facility in Georgia for seniors, with a focus on senior veterans. Continue public improvements, site work and vertical construction in FY 2015.
- Close transaction with Clark/Atlanta University for a potential land swap, which may include a disposition of land.
- Explore off-site neighborhood stabilization measures and homeownership for Choice Neighborhoods.
- Continue to explore acquisitions and other opportunities within the Master Plan area to further long-term sustainability.
- Continue Master Planning activities.

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

Choice Neighborhoods – In FY 2011, as part of the revitalization of University Homes, AHA applied for and was awarded a \$250,000 Choice Neighborhoods Planning Grant from HUD for the former University Homes and the surrounding Atlanta University Center neighborhood. With a strong emphasis on access to high-quality educational opportunities, the planning grant provided funds to develop a plan to transform the University Homes site and the surrounding neighborhood into a healthy, sustainable mixed-use, mixed-income neighborhood. The plan is known as the Choice Neighborhoods Transformation Plan (CNTP). AHA, and its Master Developer, Integral, will work in concert with the City of Atlanta, Invest Atlanta, the Atlanta University Center Consortium, community partners and residents to engage in activities and transform the target area, subject to funding availability.

Seeking funding to support the CNTP and following a series of community planning meetings and with the support of partners, AHA submitted an application for a Choice Neighborhoods Implementation Grant in September 2013. If funded, AHA and its partners will begin implementation of the program as outlined in the grant application and as may be required by HUD. If not funded in the HUD 2013 Notice of Funding Availability (NOFA), AHA may consider reapplying in HUD's 2014 NOFA round. Activities in the CNTP that are funded with other sources will be implemented.

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

In other neighborhoods surrounding master planned developments, AHA will continue advancing its homeownership goals by providing down payment assistance to eligible homebuyers to purchase affordable homes through its Builders/Owners Agreement Initiative. Under the Builders/Owners Agreement Initiative, AHA's private sector development partners enter into agreements with single-family home builders to provide down payment assistance to families who earn from 80 to 115 percent (depending on the funding source) of AMI. The down payment assistance can be used for closing costs and/or to reduce the first mortgage loan amount, thus making the loan affordable and within reach of first-time homebuyers. The Builders/Owners Agreement Initiative continues to be a good partnership initiative to reduce the excess inventory of newly constructed single family units in the market, while increasing affordable homeownership opportunities.

As the local market conditions improve and as new for-sale homes are developed in support of AHA revitalization programs or neighborhood stabilization, AHA may re-engage its down payment assistance programs in master-planned communities other than West Highlands. Additionally, to leverage other state and local down payment assistance programs and available funds, AHA may explore expanding its down payment assistance programs throughout the city of Atlanta as funds are available.

B. Advance other real estate development initiatives.

In addition to land transactions associated with Master-Planned mixed-income communities, AHA may engage in land transactions associated with AHA-owned vacant parcels that were former public housing sites (previously known as “Quality of Life Initiative” or “QLI” sites).

- AHA may enter into negotiations with Atlanta Public Schools (APS) or the City of Atlanta for the swap, acquisition or disposition of AHA-owned land parcels.
- AHA may participate in land transactions to support the future revitalization of any of the former public housing sites, AHA-owned vacant land or neighborhood stabilization properties.
- AHA may dispose of the Herndon Homes site to the State of Georgia (or one of its agencies) or facilitate development of the site in a manner that supports the stadium project.

C. Expand housing opportunities utilizing PBRA assistance and the Housing Choice tenant-based voucher program.

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

AHA pulled from its Housing Choice waiting lists during FY 2014 and expects to continue this process through FY 2015. If the waiting list is exhausted, AHA may explore opening the Housing Choice waiting list, subject to funding availability.

With HUD's renewed focus on voucher fund utilization, AHA is currently engaged in planning and analysis to determine its strategic approach to increase utilization over the next three years. As HUD provides further guidance, AHA will seek the input of key stakeholders in designing local solutions. This process may result in changes to AHA's current approach to serving families.

D. Implement conversion (reformulation) demonstration for Centennial Place.

On November 2, 2012, HUD approved AHA's proposal to pilot AHA's Reformulation Demonstration Program at Centennial Place under the auspices of its MTW Agreement. Of the 738 residential units in four development phases, 301 units receive public housing operating subsidy pursuant to Section 9 of the U.S. Housing Act of 1937, as amended (the Act). Under the Reformulation Demonstration Program, the operating subsidy for the 301 public housing-assisted units will be converted to project based rental assistance (PBRA) as designed and implemented by AHA using its MTW flexibility. On April 23, 2013, AHA received additional Housing Choice voucher funding which will be used as part of the PBRA funding to replace the public housing operating subsidy upon conversion. AHA's developer partner received Low Income Housing Tax Credits for Phase I, which will close in FY 2015.

During FY 2015, AHA will continue to implement the reformulation program at Centennial Place, while exploring reformulation strategies that will improve the long-term financial sustainability and preserve public and private investments in its other mixed-income rental communities as anticipated in and pursuant to AHA's MTW Agreement.

E. Expand supportive housing and homelessness initiatives.

In FY 2015, AHA, in partnership with private-sector developers, will continue developing alternative service-enriched housing opportunities for persons with a variety of special needs.

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

City-wide Homelessness Initiatives – Using its MTW flexibility and funds, in FY 2014 AHA expanded its commitment in support of efforts to reduce homelessness. AHA will also continue to collaborate with the United Way of Greater Atlanta, the City of Atlanta, Veterans Affairs, HUD, and various state and local entities. In FY 2015 AHA may explore various rent reforms and additional pilots to assist with homelessness initiatives.

Affordable Assisted-Living Demonstration Project and Other Medicaid-Funded Services – In support of the development of the Oasis at Scholars Landing — a 60-unit affordable assisted-living community currently under construction — AHA, its private-sector developer partner, and a consultant with a strong track record in providing affordable assisted-living communities, are exploring opportunities to use Medicaid funds for assisted-living supportive services. AHA and its partner may submit a proposal for a demonstration project to the State of Georgia that would allow the use of Medicaid funding to cover services in an assisted-living setting.

AHA will continue to use MTW funds to support housing and supportive services for persons with mental or developmental disabilities at The Gardens at CollegeTown (formerly the John O. Chiles Annex building), a 26-unit supportive services community. AHA will also explore Medicaid and other programs to provide funding for these services.

Veterans Supportive Housing – In FY 2013 AHA was awarded 185 additional Veterans Affairs Supportive Housing (VASH) Program tenant-based vouchers which may be project-based under AHA's PBRA program. At Oasis at Scholars Landing, the planned affordable assisted living community, AHA is targeting veterans who can use Aid and Attendance benefits from the Veterans Administration to cover the cost of support services.

F. Reposition AHA-Owned Residential Communities in partnership with new property management and real estate development firms.

AHA's business model for the AHA-Owned Residential Communities utilizes third-party professional property management firms to handle comprehensive site-based management in accordance with AHA's goals, policies, and financial resources. Following a competitive solicitation in FY 2013, new Property Manager-Developer (PMD) partners – The Integral Group, The Michaels Organization, and Columbia Residential – took over comprehensive management of the AHA-Owned Residential Communities. The solicitation included professional property management services and real estate development services with the intention to attract private funding for updating and modernizing the properties in order to bring them up to market-rate competitive standards.

As anticipated in AHA's MTW Agreement, AHA and its partners will explore demonstration programs to convert the subsidy from Section 9 to Section 8 for one or more of the AHA-Owned Residential Communities. AHA and the PMDs will incorporate results from the Green Physical Needs Assessments (PNAs) to determine the long-term strategy for redevelopment and modernization of the properties.

Priority 2:

Advance AHA's Human Development Initiatives

FY 2015 FOCUS: Increase the number of Housing Choice households that are compliant with AHA's Work/Program Requirement through case management services, expanded partnerships, and contract service providers.

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

A hallmark of AHA's success has been the implementation of AHA's work/program requirement, which applies to all non-elderly and non-disabled adults in all AHA programs. AHA continues to believe strongly in the value, dignity, and economic independence that work provides. Demonstrating the impact of mixed-income environments, 96 percent of AHA-assisted households with Target Adults¹ in AHA-Sponsored Mixed-Income Communities and 95 percent of households in PBRA Communities were in compliance with AHA's work/program requirement. By contrast, only 37 percent of Housing Choice households were in full compliance.

Because the primary paths to self-sufficiency are work and education, AHA has determined a need to adjust its strategies and procedures to assist target adults in the Housing Choice Voucher Program with achieving compliance with the work/program requirement. Beginning in FY 2014 and continuing in FY 2015, AHA will implement a temporary deferment process for non-compliant households with the goal of compliance within 6 – 12 months.

Work/Program Requirement

As a condition of receiving the housing subsidy:

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

and

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

These non-compliant households can be further subdivided into two categories: non-compliant and progressing, a newly introduced status. For households in which all target adults are engaged in a minimum of 15 hours per week of work, training, and/or school, AHA will designate their status as "progressing." Progressing households will be encouraged to continue improvements and will not be referred for support services until their next recertification.



For households in which Target Adults are not working or meeting any of the work/program requirements – i.e. “non-compliant” households – AHA will utilize an expanded Human Development Services staff (including two Family Self-Sufficiency Coordinators) to provide case management services to address the needs of the whole family in support of Target Adults transitioning to the workforce. For many families, their reasons for unemployment may be related to other issues, such as access to quality affordable child care, low reading levels, or criminal backgrounds. Even for many who desire to work, families often have long-term, complex barriers (including managing the effects of previous trauma or serving as caregiver for another household member) to being successful in the mainstream. The issues also vary by age group.

¹ Target Adults are non-elderly, non-disabled adults ages 18 – 61 years old who are subject to the work/program requirement.

AHA's Human Development staff will assess each family's specific needs, and then refer them to contract service providers that specialize in particular issues. Staff will monitor the family's progress and provide guidance for up to 12 months. If a family fails to become compliant or approved for hardship exemption, AHA may begin proceedings to terminate their assistance.

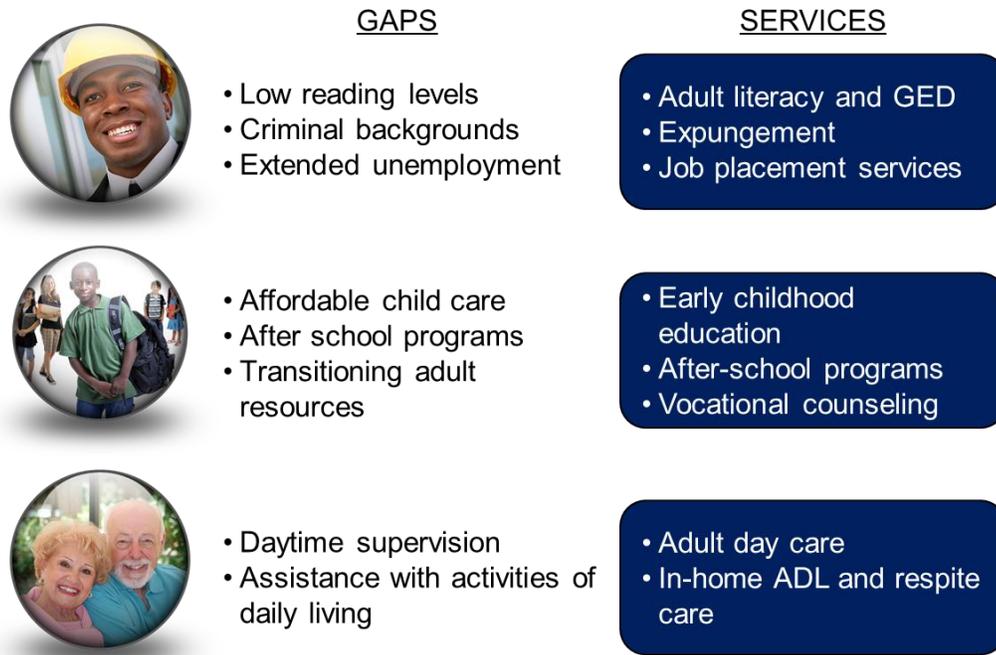


Figure 1: AHA will provide case management and referrals for needed services.

In advancing its human development initiatives during FY 2015, AHA will:

- Continue to collaborate with private sector real estate partners and other stakeholders to advance the human development components of the revitalization master plans and leverage these resources for the benefit of AHA families across programs.
- Build and strengthen community partnerships that support the advancement of families and educational achievement. Partners include the Atlanta Public Schools and Atlanta Workforce Development.
- Explore additional strategic investments in early childhood education and after-school programs.
- Leverage existing technology automation and capabilities of the integrated Enterprise Resource Planning solution.

Priority 3: Complete the business transformation and integrated Enterprise Resource Planning initiative.

FY 2015 FOCUS: Optimize investments in systems and deploy new capabilities throughout the agency.

As part of a strategy to strengthen AHA's business model, AHA initiated a multi-year business transformation effort in FY 2011 to accomplish the following:

- Implement a technology-enabled and **"customer-centric" service delivery model** for voucher administration.
- Create a "best-in-class" **integrated real-estate group** including development, asset management and real estate finance.
- Implement **enterprise-wide professional services** through the consolidation and enhancement of "like" functions to better support our customers, partners, and internal AHA departments.

This initiative was designed to support greater productivity of AHA's staff, resulting in AHA providing better customer service to AHA-assisted families, as well as to AHA's partners, stakeholders and the community at-large. Several areas were identified to transform AHA's business and address changes needed in policies and procedures, process improvements, technology solutions, and organizational restructuring and alignment (See Figure 2).

Figure 2: Dimensions of Business Transformation



Since initiating the business transformation initiative in FY 2011, AHA has made significant progress in deploying and stabilizing its future-state business processes and supporting technologies. (See Figure 3)

Figure 3: iERP Implementation Progress by Project

	FY 2014	FY 2015
Finance, Procurement, Grants Management	Stabilization	Optimization
Housing Choice and Human Development	Stabilization	Optimization
Document Management Automation	Stabilization	Optimization
50058 Automation	Stabilization	Optimization
Real Estate Group	Deployment	Deployment & Stabilization
Business Intelligence		Deployment & Stabilization

During FY 2015, AHA expects to complete its business transformation initiative. Below is a summary of the key planned activities required to complete AHA’s business transformation initiative:

- Complete the deployment and stabilization of all remaining future-state business processes.
- Optimize performance of future-state business processes based on identified key performance indicators.
- Implement automation activities including online self-service capability, online document management, and business intelligence.
- Establish governance controls to ensure appropriate maintenance and continuous improvement of future-state policies, processes, technology, and data.

Priority 4: Initiate a long-term strategic real estate and human development plan.

FY 2015 FOCUS: Engage partners and stakeholders in a long-term planning process.

AHA first articulated its ten-year strategic plan when it was submitted to HUD in 2004. In the ensuing years, AHA has used its MTW relief and innovations to implement successfully the strategies identified in this plan and deconcentrate poverty in Atlanta. As with any plan, a refresh is in order.

As part of a strategic planning process, AHA will articulate the long-term approach to real estate and human development.

A comprehensive real estate strategy will be designed to determine the relative value and opportunities for development and management of real estate holdings throughout the city of Atlanta. For AHA's 16 mixed-use, mixed-income communities, the planning work will address opportunities for "further leverage," i.e. portions of the Master Plans that enhance the long-term sustainability of the community. Planning also includes creating short-term and long-term options for the sites of former public housing developments throughout Atlanta that were demolished and are not part of any ongoing redevelopment effort or the subject of current negotiations regarding a proposed disposition. To ensure that its land holdings are put to the "highest and best use" to the benefit of families and the community at large, AHA will engage in a process that also considers citywide and regional goals. In preparation for the planning effort, AHA commissioned a consulting study in FY 2014, and may use the output of the study as input.

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

During FY 2015, AHA's leadership team including the AHA Board of Commissioners will engage AHA's real estate partners and the broader stakeholder community in preparing AHA's five-year strategic plan. Targeted for completion during FY 2015 and implementation in FY 2016, the strategic plan will lay out AHA's five-year business plan – informed by best practices and lessons learned, changing demographics, and trends in the real estate and financial markets.

As a result of the strategic planning process, AHA may procure one or more development partners to begin master planning activities and funding opportunities for the redevelopment of former public housing sites.

Section III.

MTW Policy Innovations

This section provides a high-level overview of policies that AHA has developed and implemented in pursuing innovative strategies as an MTW agency, and any policies that AHA is proposing for implementation under its MTW Annual Implementation Plan. AHA policies are effective only after approval by the AHA Board of Commissioners who, in doing so, authorize the president and chief executive officer to execute and provide administrative direction in the implementation of those policies through standard operating procedures and guidelines.

Key Policy Documents

Traditionally, AHA has created separate policy documents to capture MTW policy innovations in effect for AHA-Sponsored Mixed-Income Communities, AHA-Owned Residential Communities, rental housing assistance under the tenant-based Housing Choice Voucher Program and properties utilizing Project Based Rental Assistance (PBRA) for the creation of additional mixed-income housing opportunities.

AHA has consolidated these documents into a single document and is submitting the *Amended and Restated Statement of Corporate Policies* (“*Statement of Corporate Policies*”) as part of the submission of this Plan in Appendix G. The **Statement of Corporate Policies** is composed of three sections:

- *Statement of Policies Governing the Leasing and Residency of Assisted Apartments*
- *Statement of Policies Governing the Housing Choice Tenant-Based Program*
- *Statement of Policies for Supportive Housing*

After a thorough review of existing policies and current plans for FY 2015, AHA determined that its current policies, with little change, sufficiently allow AHA to implement its mission in the coming fiscal year. If it is determined that additional policy changes are necessary, AHA will follow the appropriate protocols to seek approval from the AHA Board of Commissioners.

Innovations Implemented Under AHA's MTW Agreement

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

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

For a detailed description of key innovations or reforms AHA has implemented as a result of its participation in the MTW Demonstration, see AHA's *FY2013 MTW Annual Report* at www.atlantahousing.org.

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 - Certifications of Compliance with Regulations
 - Certification of Payments to Influence Federal Transactions
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1. AHA Legacy Attachment B Requirements

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

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

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

Annual Plan Element	Location in FY 2015 MTW Plan
I. Households Served	
A. Number and characteristics of households served at beginning of period, by: <ul style="list-style-type: none"> - unit size - family type (family vs. elderly or disabled) - income group (<30: 30-50; 50-80;>80) - housing type (LRPH, leased, other) - race & ethnicity 	Appendix D: Housing Opportunities Information <ol style="list-style-type: none"> 1. Households Served Projections 2. Household Characteristics
B. Identify number and characteristics of households on waiting lists (all housing types). Discuss waiting list issues and proposed actions	Appendix D: Housing Opportunities Information <ol style="list-style-type: none"> 3. Waiting List Characteristics 5. Leasing and Waiting List Information
C. Number projected to be served at end of period	Appendix D: Housing Opportunities Information <ol style="list-style-type: none"> 1. Households Served Projections
D. Narrative discussion/explanation of change	
II. Occupancy Policies	
A. Statement of policies governing eligibility, selection, admissions, assignment, and occupancy of families, including the admissions policy under section 16(a)(3)(B) for deconcentration of lower-income families	Appendix G: AHA Policy Documents
B. Statement of Rent Policy	
III. Changes in the Housing Stock	
A. Number of units in inventory at beginning of period by program (LRPH, leased, other)	Appendix D: Housing Opportunities Information <ol style="list-style-type: none"> 1. Households Served Projections
B. Projected number at end of period by program	Public Housing inventory is reported to HUD through the PIC system. Housing Choice unit leasing information is submitted monthly through VMS.
IV. Sources and Amounts of Funding	
A. Identify/discuss all sources and amounts of funding included in consolidated budget statement	Appendix F: Financial Analysis <ol style="list-style-type: none"> 1. Annual Budget – FY 2014
B. Identify/discuss sources, amounts, and planned uses of special purpose funds outside the consolidated budget (e.g., DEP)	
C. Consolidated Budget Statement	

1. AHA Legacy Attachment B Requirements

Annual Plan Element	Location in FY 2015 MTW Plan
V. Uses of Funds	
A. Previous year expenditures by line item	Appendix F: Financial Analysis 3. Combined Statements of Revenue, Expense, & Changes in Net Assets – FY 2013
B. Planned expenditures by line item	Appendix F: Financial Analysis
C. Description of proposed activities/investments by line item/explanation of change from previously approved plan	1. Annual Budget – FY 2014
D. Reserve balance at beginning of year. Discuss adequacy of reserves.	
VI. Capital Planning	
A. Describe major capital needs and projects, estimated costs, and proposed timetables	Appendix F: Financial Analysis 2. Capital Planning – FY 2015
B. Identify planned expenditures	
C. Demolition and Disposition Requests, if planned	Appendix D: Housing Opportunities Information 6. AHA-Owned, Managed, and Sponsored Communities and Properties
D. Homeownership activities, if any	Appendix D: Housing Opportunities Information 1. Households Served Projections Section II. 2015 Priorities, Priority 1
VII. Management Information for Owned/Managed Units	
A. Vacancy (Occupancy) Rates	Appendix E: Management Information for Owned / Managed Units at AHA-Owned Residential Communities and Assisted Units at Mixed Income Communities
1. Occupancy rates by property beginning of period	
2. Narrative: issues and proposed action	
3. Target rates by property at end of period	
B. Rent Collections	
1. Rents uncollected (%) beginning of period	
2. Narrative: issues and proposed actions	
3. Target % at end of period	
C. Work Orders	
1. Response rates beginning of period <ul style="list-style-type: none"> ▪ % emergency within 24 hrs ▪ % regular within 30 days 	
2. Narrative: issues and proposed actions	
3. Target rates at end of period	
D. Inspections	
1. Description of inspection strategy	
2. Planned inspections (% this FY)	
E. Security	
1. Narrative: security issues and proposed actions	

1. AHA Legacy Attachment B Requirements

Annual Plan Element	Location in FY 2015 MTW Plan
VIII. Management Information for Leased Housing	
A. Leasing Information	
1. Units under lease (%) beginning of period	Appendix D: Housing Opportunities Information 1. Households Served Projections
2. Target lease up rate at end of period	Public Housing inventory is reported to HUD through the PIC system. Housing Choice unit leasing information is submitted monthly through VMS.
3. Plans regarding: <ul style="list-style-type: none"> ▪ Ensuring rent reasonableness ▪ Expanding housing opportunities ▪ Deconcentration of low-income families 	Section III. MTW Policy Innovations Appendix C: Ongoing Activities Directory
4. Issues and proposed actions	
B. Inspection Strategy	
1. Description of inspection strategy, including: <ul style="list-style-type: none"> a) Planned inspections completed (% this FY) by category: <ul style="list-style-type: none"> ▪ Annual HQS Inspections ▪ Pre-contract HQS Inspections ▪ HQS Quality Control Inspections b) HQS Enforcement 	AHA will continue to refine its Housing Choice Inspections Standards to ensure that Housing Choice participants have the opportunity to reside in quality living environments including quality housing units and quality neighborhoods. AHA established higher inspection standards than HUD's Housing Quality Standards with a focus on improving the quality of the units on the Housing Choice Voucher Program. Section III. MTW Policy Innovations Appendix C: Ongoing Activities Directory
IX. Resident Programs	
1. Description of activities	Section II. 2015 Priorities, Priority 2
2. Issues and proposed actions	Appendix C: Ongoing Activities Directory

1. AHA Legacy Attachment B Requirements

Annual Plan Element	Location in FY 2015 MTW Plan
X. Other Information as Required	
<p>A. Board Resolution</p> <ul style="list-style-type: none"> ▪ Adopting Plan ▪ Certifying that Public Hearing Requirements were met 	<p>Appendix B: Resolution and Certifications</p> <p>2. Resolution to Authorize Submission of AHA's FY 2015 MTW Annual Implementation Plan</p>
<p>B. Required Certifications and other submissions from which the Agency is not exempted by the MTW Agreement</p>	<p>Appendix B: Resolution and Certifications</p> <ol style="list-style-type: none"> 1. Secretary's Certificate 3. Certification Regarding Substantive Information Reporting Requirements 4. Certifications of Compliance with Regulations 5. Certification of Payments to Influence Federal Transactions 6. Certification for a Drug Free Workplace <p>NOTE: AHA has replaced HUD's "Disclosure of Lobbying Activities" Certification with form 50071: "Certification of Payments to Influence Federal Transactions" because AHA does not engage in lobbying activities. This action is consistent with AHA's current business practice.</p>
<p>C. Submissions required for the receipt of funds</p>	<p>HUD no longer requires an annual submission from AHA to request Housing Choice funds; and AHA submitted the CY 2014 Public Housing Operating Subsidy Calculations to HUD in November 2013.</p> <p>AHA cannot submit a request for Capital Fund Program (CFP) funds or Replacement Housing Factor (RHF) funds for AHA's FY 2015 Annual Plan since HUD has not yet released the amount of the 2014 grant awards. AHA will submit the required amendments to the Capital Fund Annual Contributions Contract (ACC) and Performance and Evaluation reports to HUD as soon as HUD provides the funding levels.</p>

2. HUD Form 50900 Attachment B

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

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

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

Annual Plan Element	Location in FY 2015 MTW Plan
I. Introduction	
A. Table of Contents, which includes all the required elements of the Annual MTW Plan; and	Annual Plan Table of Contents Annual Plan Appendices Table of Contents
B. Overview of the PHA's short-term and long-term MTW goals and objectives. Short-term goals and objectives include those that the PHA plans to accomplish within the fiscal year. Long-term goals and objectives include those that the PHA plans to accomplish beyond the current fiscal year. PHAs have the ability to define the level of specificity in the short-term and long-term goals and objectives.	Section I. Executive Summary Section II. 2015 Priorities (Priorities 1 - 4) Appendix C. Ongoing Activities Directory
II. General Housing Authority Operating Information	
A. Housing Stock Information:	
Planned new public housing units to be added during the fiscal year	Appendix D: Housing Opportunities Information 1. Households Served Projections
Planned public housing units to be removed during the fiscal year	
New Housing Choice Vouchers to be project-based during the fiscal year	
Other changes to the housing stock anticipated during the fiscal year	
General description of all planned capital fund expenditures during the plan year	Appendix F: Financial Analysis 2. Capital Planning – FY 2015
B. Leasing Information	
Planned number of households served at the end of the fiscal year	Appendix D: Housing Opportunities Information 1. Households Served Projections
Reporting Compliance with Statutory MTW Requirements	AHA does not have any non-MTW PH units in its inventory.
Description of any anticipated issues related to leasing of public housing, Housing Choice vouchers and/or local, non-traditional units and possible solutions	Appendix D: Housing Opportunities Information 1. Households Served Projections

Annual Plan Element	Location in FY 2015 MTW Plan
C. Wait List Information	
Wait list information projected for the beginning of the fiscal year by program	Appendix D: Housing Opportunities Information 5. Leasing and Waiting List Information
Description of changes to the wait list or policy changes.	
III. Proposed MTW Activities: HUD approval requested	
Provide the listed items below grouped by each MTW activity.	
A. Describe each proposed MTW activity;	N/A
B. Describe how each proposed activity will achieve one or more of the three statutory objectives;	
C. Identify and discuss the anticipated impact of each proposed MTW activity on the stated objective(s);	
D. Provide the anticipated schedules for achieving the stated objective(s)	
D. Provide the metric(s) from the "Standard HUD Metrics" section, baseline performance level, yearly benchmarks, final projected outcome(s), and data source for metrics.	
F. Cite the authorization(s) detailed in Attachment C or D of the Standard MTW Agreement that gives the PHA the flexibility to conduct the activity. Explain why the cited authorization from Attachment C or D is needed to engage in this activity.	
G. Provide the following information for all rent reform activities: impact analysis, hardship case criteria, annual reevaluation of rent reform activity, transition period.	N/A
IV. Approved MTW Activities: HUD approval previously granted	
Provide the listed items below grouped by each MTW activity.	
A. Implemented Activities	
1. List approved, implemented, ongoing activities continued from the prior plan year(s) that are actively utilizing flexibility from the MTW Agreement; specify the Plan Year in which the activity was first identified and implemented;	Section II. 2015 Priorities (Priorities 1-4) Appendix C. Ongoing Activities Directory
2. Provide a description of the activity and an update on its status;	
3. Indicate if the PHA anticipates any non-significant changes or modifications, to the activity during the plan year;	
4. any changes or modifications to the metrics, baselines or benchmarks during the plan year;	

Annual Plan Element	Location in FY 2015 MTW Plan
<p>5. If the PHA requires a different authorization from Attachment C or D when implementing the activity than was initially proposed, the PHA must re-propose the activity and include all required elements in Section (III) Proposed Activities; and</p>	<p>On November 13, 2008, AHA and HUD executed AHA's Amended and Restated MTW Agreement. On January 16, 2009, AHA and HUD executed a further amendment to the Amended and Restated MTW Agreement (collectively, the "Amended and Restated MTW Agreement"), which clarified and expanded AHA's ability to use MTW Funds outside of Section 9 and Section 8 of the U.S. Housing Act of 1937, as amended ("1937 Act"). The Amended and Restated MTW Agreement re-affirmed, in all material respects, all of the authorizations set forth in Appendix A of the Original MTW Agreement and includes these authorizations in Attachment D. AHA has all of the authorizations needed from HUD under the Amended and Restated MTW Agreement to implement the activities described in AHA's FY 2015 MTW Annual Plan.</p>
<p>B. Not Yet Implemented Activities</p>	
<p>1. Describe any approved activities that have been implemented that the PHA has stopped implementing but has plans to reactivate in the future; specify the Plan Year in which the activity was first approved, implemented, and placed on hold;</p>	<p>Appendix C. Ongoing Activities Directory</p>
<p>2. Provide an update on the plan for implementation of the activity;</p>	
<p>3. Provide a timeline for implementation;</p>	
<p>4. Provide an explanation of any non-significant changes or modifications to the activity since it was approved;</p>	
<p>C. Activities On Hold</p>	
<p>1. Describe any approved activities that have been implemented that the PHA has stopped implementing but has plans to reactivate in the future; specify the Plan Year in which the activity was first approved, implemented, and placed on hold;</p>	<p>Appendix C. Ongoing Activities Directory</p>
<p>2. Discuss why these activities have been placed on hold;</p>	
<p>3. Provide an update on the plan for reactivating the activity;</p>	
<p>4. Provide a timeline for re-implementation; and</p>	
<p>5. Provide an explanation of any non-significant changes or modifications to the activity since it was approved.</p>	

Annual Plan Element	Location in FY 2015 MTW Plan
C. Closed Out Activities	
1. List any approved activities that have been closed out, including activities that have never been implemented, that the PHA does not plan to implement and obsolete activities; specify the Plan Year in which the activity was first approved and implemented (if applicable);	Appendix C. Ongoing Activities Directory
2. Explain why these activities were closed out; and	
3. Provide the year the activity was closed out.	
V. Sources and Uses of Funds	
PHAs shall provide the estimated sources and amounts of MTW funding by FDS line item.	
Estimated sources of MTW funding for the fiscal year	Appendix F: Financial Analysis 1. Annual Budget – FY 2014
Estimated uses of MTW funding for the fiscal year	
Describe activities that will use only MTW Single Fund flexibility	
Local Asset Management Plan	
VI. Administrative	
The PHA shall provide the information below with the first Plan/Report submittal to HUD.	
A. Resolution signed by the Board of Commissioners, or other authorized PHA official if there is no Board of Commissioners, adopting the Annual MTW Plan Certification of Compliance (provided at the end of this Attachment B);	Appendix B: Resolution and Certifications 1. Resolution to Authorize Submission of AHA's FY 2015 MTW Annual Implementation Plan
B. The beginning and end dates of when the Annual MTW Plan was made available for public review, the dates, locations of public hearings and total number of attendees for the draft Annual MTW Plan, (to ensure PHAs have met the requirements for public participation, HUD reserves the right to request additional information to verify PHAs have complied with all requirements as set forth in the Standard MTW Agreement);	Appendix B: Resolution and Certifications 7. Public Review and Plan Changes

SECRETARY'S CERTIFICATE

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

1. I am the presently appointed and qualified Secretary of the Board of Commissioners of The Housing Authority of the City of Atlanta, Georgia ("AHA"). In such capacity, I am custodian of its records and I am familiar with its organization, membership and activities.
2. Attached hereto as Exhibit 1 is a true and correct copy of the resolution authorizing AHA to submit its Fiscal Year 2015 Moving To Work Annual Implementation Plan to the United States Department of Housing and Urban Development and to implement the projects, activities, initiatives and any policy changes described therein, and other related matters.
3. This resolution was presented to the AHA Board of Commissioners (the "Board") at its Regular Meeting on April 3, 2014 (the "Meeting").
4. The following Board members were present for the Meeting:

Daniel Halpern, Chair
James Allen, Jr.
Cecil Phillips
Margarette Paulyne Morgan White
5. At the Meeting, the Board unanimously adopted and approved the resolution attached hereto as Exhibit 1.

IN WITNESS WHEREOF, I have hereunto set my hand and the duly adopted official seal of The Housing Authority of the City of Atlanta, Georgia this 3rd day of April 2014.


JOY W. FITZGERALD,
Secretary

SEAL



EXHIBIT 1
RESOLUTION ADOPTED AT THE REGULAR MEETING
OF THE BOARD OF COMMISSIONERS HELD ON
THURSDAY, APRIL 3, 2014

RESOLUTION

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

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

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

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

WHEREAS, AHA has prepared its Fiscal Year (FY) 2015 MTW Annual Implementation Plan (also referred to herein as the FY 2015 MTW Annual Plan);

WHEREAS, the FY 2015 MTW Annual Plan identifies AHA's priorities, projects, activities, and initiatives for AHA's FY 2015 and any policy changes to be implemented during FY 2015;

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

WHEREAS, the Amended and Restated Statement of Corporate Policies, which is incorporated into the FY 2015 MTW Annual Plan, captures the Moving to Work Demonstration policy innovations in effect for the AHA-Sponsored Mixed-Income Residential Communities, AHA-Owned Residential Communities, rental assistance under the tenant-based Housing Choice Voucher Program and properties utilizing Project Based Rental Assistance as designed and implemented by AHA;

WHEREAS, the Amended and Restated Statement of Corporate Policies is comprised of three sections: the Amended and Restated Statement of Policies Governing the Leasing and Residency of Assisted Apartments, the Amended and Restated Statement of Policies Governing the Housing Choice Tenant-Based Program and the Amended and Restated Statement of Policies for Supportive Housing;

WHEREAS, during FY 2015, AHA will continue to improve and strengthen its corporate infrastructure and information technology environment, advance its real estate initiatives and advance its human development services initiatives;

WHEREAS, AHA's Senior Management consulted with the Board of Commissioners to solicit their input, guidance and direction regarding the proposed projects, activities, initiatives and policy changes that will be implemented during FY 2015, as described in Exhibit EO-1-A;

WHEREAS, AHA's FY 2015 MTW Annual Plan is the product of a comprehensive planning process in which AHA's Senior Management consulted with AHA's Board of Commissioners, resident association leaders, public housing-assisted residents, Housing Choice participants and landlords, AHA employees, Atlanta Legal Aid, Georgia Law Center for the Homeless, AHA's private sector development partners, members of the Service Provider Network, local political and government officials, various city and state agencies, other stakeholders and members of the public;

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

WHEREAS, the consultation process included a properly advertised and noticed public hearing held on March 5, 2014; and

WHEREAS, Senior Management of AHA is now recommending that the Board of Commissioners: (i) approve AHA's FY 2015 MTW Annual Plan; (ii) authorize the submission of AHA's FY 2015 MTW Annual Plan to HUD; (iii) authorize the Chair or the Vice Chair of the Board of Commissioners and AHA's Interim President and Chief Executive Officer/Secretary to execute the HUD Certifications of Compliance, attached as Exhibit EO-1-B; (iv) approve the implementation of the projects, activities, initiatives and any policy changes set forth in the FY 2015 MTW Annual Plan; and (v) approve the adoption and implementation of the Amended and Restated Statement of Corporate Policies as set forth in the FY 2015 MTW Annual Plan.

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

1. AHA's FY 2015 MTW Annual Plan, including the projects, activities, initiatives and any policy changes that will be implemented during FY 2015 as described in Exhibit EO-1-A is hereby approved.
2. Each of the Chair or the Vice Chair of the Board of Commissioners, as required, and the Interim President and Chief Executive Officer/Secretary is hereby authorized to execute Exhibit EO-1-B and any other required documents, certifications or United States Department of Housing and Urban Development (HUD) forms related to the approval and filing of AHA's FY 2015 MTW Annual Plan.

3. The Amended and Restated Statement of Corporate Policies, as set forth in AHA's FY 2015 MTW Annual Plan, is hereby approved in conjunction with AHA's FY2015 Annual Plan, and AHA is hereby authorized to adopt and implement such policies.
4. The Interim President and Chief Executive Officer is authorized to submit AHA's FY 2015 MTW Annual Plan and such other required documents, certifications or forms to HUD with such changes, additions, corrections or amendments as she shall deem necessary or appropriate or as may be required by HUD.
5. The Interim President and Chief Executive Officer and any person or persons designated and authorized to so act by the Interim President and Chief Executive Officer are hereby authorized to implement the projects, activities, initiatives and any policy changes set forth in the FY 2015 MTW Annual Plan.

FY 2015 MTW Annual Plan Resolution
Exhibit EO-1-A



AHA
FY 2015
MTW Annual Implementation Plan

Public Hearing
March 5, 2014

VALERIE SMITH
President
Jurisdiction-Wide Council



JOY W. FITZGERALD
Interim President & Chief Executive Officer

▶ 3

Vision Healthy Mixed-Income Communities;
Healthy Self-Sufficient Families

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

▶ March, 2014 FY 2015 MTW Annual Plan 4

FY 2015 MTW Annual Plan Resolution
Exhibit EO-1-A



FY 2015 Focus: Continuation and Completion

Key Priorities

- 1** Advance AHA's Real Estate initiatives and expand housing opportunities.
- 2** Advance AHA's Human Development initiatives.
- 3** Complete the business transformation and integrated Enterprise Resource Planning initiative.
- 4** Initiate a long-term strategic real estate and human development plan.

FY 2015 MTW Annual Plan Resolution
Exhibit EO-1-A

PATRICIA O'CONNELL

Vice President
Real Estate Development & Acquisitions



7

1

Advance AHA's Real Estate initiatives and expand housing opportunities

- A. Master plans for mixed-use, mixed-income communities
- B. PBRA and Housing Choice tenant-based vouchers
- C. Subsidy conversion demonstration for Centennial Place
- D. Supportive housing and homelessness initiatives
- E. New PMD property management companies at high-rises

▶ March, 2014

FY 2015 MTW Annual Plan

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FY 2015 MTW Annual Plan Resolution
Exhibit EO-1-A

AHA-Sponsored Mixed-Income Communities

Auburn Pointe

- ✓ Stabilize leasing of 150 rental units

Villages at Carver

- Continue our development activities for retail sites
- Continue negotiations with Atlanta-Fulton Public Library System for land sale



AHA-Sponsored Mixed-Income Communities



Mechanicsville

- Begin development of 75 scattered-site rental units

West Highlands

- Public improvements for future development of 154 for-sale homes
- Complete 10 for-sale affordable homes, and additional market-rate homes

AHA-Sponsored Mixed-Income Communities

Scholars Landing

- Close on 60-unit affordable assisted-living building and begin construction
- Continue land swap negotiations with Clark/Atlanta University



Centennial Place

- Facilitate public improvements on Centennial Place North parcel
- Cupola Building under consideration for rental housing
- Explore reuse of Zell Miller building for human development strategy

▶ March, 2014

FY 2015 MTW Annual Plan

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Supportive Housing and Homelessness

- PBRA for Supportive Housing
- Homelessness Pilot Programs
- Affordable Assisted Living – Oasis at Scholars Landing
- Veterans Supportive Housing



▶ March, 2014

FY 2015 MTW Annual Plan

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FY 2015 MTW Annual Plan Resolution
Exhibit EO-1-A

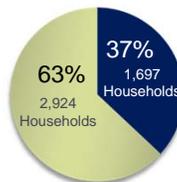
RENEÉ BENTLEY RICE

Senior Vice President
Customer Services Group

2 Advance AHA's Human Development initiatives.

Increase the number of Housing Choice households that are compliant with AHA's Work/Program Requirement through case management services, expanded partnerships, and contract service providers.

Non-Compliant



Compliant

Households in which one non-elderly, non-disabled adult ("Target Adult") is working full-time and all other Target Adults are working, in an AHA-approved training, and/or in an AHA-recognized school at least 30 hours per week.

**FY 2015 MTW Annual Plan Resolution
Exhibit EO-1-A**

New “Progressing” status until next recertification

Housing Choice households where all Target Adults are engaged in a minimum of 15 hours per week of work, training, and/or school, will be determined to be “Progressing” and will not be referred immediately to HDS for services.



AHA will provide case management and referrals for needed services.

GAPS

SERVICES



- Low reading levels
- Criminal backgrounds
- Extended unemployment

- Adult literacy and GED
- Expungement
- Job placement services



- Affordable child care
- After-school programs
- Transitioning adult resources

- Early childhood education
- After-school programs
- Vocational counseling



- Daytime supervision
- Assistance with activities of daily living

- Adult day care
- In-home ADL and respite care

FY 2015 MTW Annual Plan Resolution
Exhibit EO-1-A

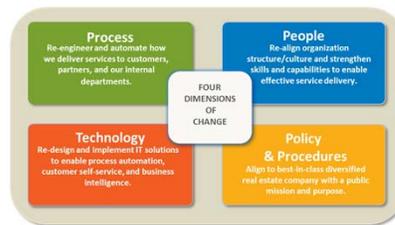
TRACEY SCOTT

Vice President
Innovation

17

Business transformation accomplishments thus far

- **PEOPLE:** strengthened core capabilities, reorganized and realigned, training
- **PROCESS:** revamped and streamlined, automated procurement, reduced paper
- **POLICIES:** updated, centralized library, enhanced governance
- **TECHNOLOGY:** Installed core system, document management



▶ March, 2014

FY 2015 MTW Annual Plan

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FY 2015 MTW Annual Plan Resolution
Exhibit EO-1-A

3

Complete the business transformation and integrated Enterprise Resource Planning initiative.

	FY 2014	FY 2015
Finance, Procurement, Grants Management	Stabilization	Optimization
Housing Choice and Human Development	Stabilization	Optimization
Document Management Automation	Stabilization	Optimization
50058 Automation	Stabilization	Optimization
Real Estate Group	Deployment	Deployment & Stabilization
Business Intelligence		Deployment & Stabilization

JOY W. FITZGERALD

Interim President & Chief Executive Officer

FY 2015 MTW Annual Plan Resolution
Exhibit EO-1-A

4 Initiate a long-term strategic real estate and human development plan.

Real Estate

- ▶ Master Plans and “further leverage”
- ▶ “Highest & best use” of vacant land
- ▶ Coordination with citywide and regional plans

Human Development

- ▶ Family self-sufficiency
- ▶ Graduation and turnover
- ▶ Education and workforce development
- ▶ Deconcentration of poverty
- ▶ Aging well strategy

Questions & Comments



FY 2015 MTW Annual Plan Resolution
Exhibit EO-1-A

Public Comment Period

February 12 – March 13, 2014

Provide comments via the following:

www.atlantahousing.org

strategy@atlantahousing.org

MTW Plan Message Line: 404-817-7458

March, 2014

FY 2015 MTW Annual Plan

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Atlanta Housing Authority

THANK YOU

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**Annual Moving to Work Plan
Certifications of Compliance**U.S. Department of Housing and Urban Development
Office of Public and Indian Housing**Certifications of Compliance with Regulations:
Board Resolution to Accompany the Annual Moving to Work Plan***

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairman or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the Annual Moving to Work Plan for the PHA fiscal year beginning July 1, 2014, hereinafter referred to as "the Plan", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:

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

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

The Housing Authority of the
City of Atlanta, Georgia
 PHA Name

GA 006
 PHA Number/HA Code

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

 Name of Authorized Official

Chair, Board of Commissioners
 Title

 Signature

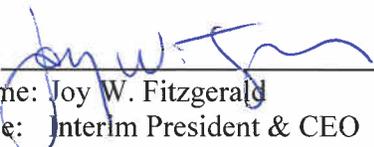
 Date

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

**CERTIFICATION TO THE U.S. DEPARTMENT OF HOUSING AND URBAN
DEVELOPMENT REGARDING THE HOUSING AUTHORITY OF
THE CITY OF ATLANTA, GEORGIA'S
FY 2015 MOVING TO WORK ANNUAL IMPLEMENTATION PLAN**

On behalf of The Housing Authority of the City of Atlanta, Georgia ("AHA"), and in accordance with AHA's Amended and Restated Moving to Work ("MTW") Agreement, effective as of November 13, 2008, as further amended by that certain Second Amendment to the Moving to Work Agreement, effective as of January 16, 2009 (the "MTW Agreement"), I hereby certify that AHA's FY 2015 MTW Annual Implementation Plan (the "FY 2015 MTW Annual Plan") meets the substantive information reporting requirements of the Paperwork Reduction Act for the MTW Demonstration Program and HUD Form 50900 (OMB Control Number 2577-0216).

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

By: 
Name: Joy W. Fitzgerald
Title: Interim President & CEO

Date: April 8, 2014

**Annual Moving to Work Plan
Certifications of Compliance**

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

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

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairman or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the Annual Moving to Work Plan for the PHA fiscal year beginning July 1, 2014, hereinafter referred to as "the Plan", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:

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

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

The Housing Authority of the
City of Atlanta, Georgia
PHA Name

GA 006
PHA Number/HA Code

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

Daniel Halpern
Name of Authorized Official

Chair, Board of Commissioners
Title


Signature

4/3/14
Date

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

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

I certify that the Atlanta Housing Authority Moving to Work Annual Plan for Fiscal Year 2015 is consistent with the City of Atlanta's current Consolidated Plan (2010-2014). In particular, AHA's MTW FY2015 Annual Plan supports the City of Atlanta's Rehabilitation and Infill Housing, Cost-Burdened and Affordable Housing Needs, Special Needs Housing, Elderly Housing as well as other areas of the Consolidated Plan. I further certify that an Analysis of Impediments to Fair Housing Choice has been completed.

Applicant Name: The Housing Authority of the City of Atlanta, Georgia
Project Name: Moving to Work Annual Plan for Fiscal Year 2015
Location of the Project: City of Atlanta, Georgia
Federal Program: Moving to Work Demonstration

Certifying Jurisdiction: **City of Atlanta**
Certifying Official: **LaShawn Gardiner**
Title: **Management Analyst, Sr.**
Signature: 
Date: **3-18-2014**

Certification of Payments to Influence Federal Transactions

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

OMB Approval No. 2577-0157 (Exp. 01/31/2014)

Applicant Name

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

Program/Activity Receiving Federal Grant Funding

Moving To Work Demonstration Program

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

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

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

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

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

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

Name of Authorized Official

Joy W. Fitzgerald

Title

Interim President and CEO

Signature

Date (mm/dd/yyyy)

4/8/14

Certification for a Drug-Free Workplace

U.S. Department of Housing and Urban Development

Applicant Name

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

Program/Activity Receiving Federal Grant Funding

Moving To Work Demonstration Program

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

See attached.

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

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

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

Name of Authorized Official

Joy W. Fitzgerald

Title

Interim President and CEO

Signature

X



Date

4/8/14

**Attachment, Certification for a Drug-Free Workplace (HUD-50070)
AHA-Owned Facilities and Land (as of February 10, 2014)**

Parcel ID	Address	City	State	Zip Code
14-0117-0003-055-2	0 Abbott St	Atlanta	GA	30310
14-0117-0002-103-1	305 Abbott St	Atlanta	GA	30310
14-0117-0003-017-2	320 Abbott St	Atlanta	GA	30310
15-180-02-025	0 Alston Dr SE	Atlanta	GA	30317
14-0072-0006-094-1	257 Amal Dr	Atlanta	GA	30315
14-0072-0002-032-5	0 Arthur J. Langford Rd	Atlanta	GA	30315
14-0116-0003-078-5	0 Ashby St	Atlanta	GA	30314
14-0046-0010-140-9	0 Auburn Ave NE	Atlanta	GA	30303
14-0046-0010-141-7	333 Auburn Ave NE	Atlanta	GA	30303
14-0046-0010-197-9	333 Auburn Ave NE	Atlanta	GA	30303
14-0117-0002-037-1	0 Baldwin St SW	Atlanta	GA	30310
14-0117-0002-038-9	0 Baldwin St SW	Atlanta	GA	30310
14-0117-0002-039-7	0 Baldwin St SW	Atlanta	GA	30310
14-0117-0002-102-3	1015 Baldwin St SW	Atlanta	GA	30310
14-0117-0002-040-5	1047 Baldwin St SW	Atlanta	GA	30310
14-0117-0002-095-9	1059 Baldwin St SW	Atlanta	GA	30310
17-0267-LL-075-5	3475 Bankhead Hwy NW	Atlanta	GA	30331
17-0267-LL-083-9	3476 Bankhead Hwy NW	Atlanta	GA	30331
14-0252-LL-064-3	2440 Barge Rd SW	Atlanta	GA	30331
14-0047-0001-093-0	0 Bedford Pl NE	Atlanta	GA	30303
14-0110-0004-034-3	875 Booker Washington Dr	Atlanta	GA	30314
14-0110-0007-007-6	880 Booker Washington Dr	Atlanta	GA	30314
14-0110-0004-036-8	883 Booker Washington Dr	Atlanta	GA	30314
14-0110-0007-006-8	886 Booker Washington Dr	Atlanta	GA	30314
14-0110-0007-004-3	890 Booker Washington Dr	Atlanta	GA	30314
14-0042-0004-080-9	951 Boulevard SE	Atlanta	GA	30312
14-0051-0009-159-4	0 Butler St	Atlanta	GA	30303
14-0051-0009-160-2	0 Butler St	Atlanta	GA	30303
14-0110-0009-017-3	757 Carter St	Atlanta	GA	30314
14-0110-0009-019-9	765 Carter St	Atlanta	GA	30314
14-0110-0009-018-1	767 Carter St	Atlanta	GA	30314
14-0079-0006-003-5	0 Centennial Olympic Park Dr NW	Atlanta	GA	30313
14-0079-0011-059-0	0 Centennial Olympic Park Dr NW	Atlanta	GA	30313
17-0005-LL-085-1	0 Cheshire Bridge Rd	Atlanta	GA	30324
17-0005-LL-086-9	2170 Cheshire Bridge Rd	Atlanta	GA	30324
17-0227-LL-018-4	0 Clarissa Dr NW	Atlanta	GA	30318
14-0041-0002-035-6	0 Climax St SE	Atlanta	GA	30315
14-0041-0002-052-1	373 Climax St SE	Atlanta	GA	30315
14-0041-0002-029-9	374 Climax St SE	Atlanta	GA	30315
14-0041-0002-051-3	379 Climax St SE	Atlanta	GA	30315
14-0041-0002-030-7	380 Climax St SE	Atlanta	GA	30315
14-0041-0002-050-5	385 Climax St SE	Atlanta	GA	30315
14-0041-0002-031-5	388 Climax St SE	Atlanta	GA	30315
14-0041-0002-049-7	393 Climax St SE	Atlanta	GA	30315
14-0041-0002-032-3	394 Climax St SE	Atlanta	GA	30315
14-0041-0002-033-1	400 Climax St SE	Atlanta	GA	30315
14-0041-0002-034-9	406 Climax St SE	Atlanta	GA	30315
14-0041-0002-048-9	407 Climax St SE	Atlanta	GA	30315
14-0041-0002-047-1	411 Climax St SE	Atlanta	GA	30315
14-0041-0002-036-4	412 Climax St SE	Atlanta	GA	30315
14-0041-0002-046-3	417 Climax St SE	Atlanta	GA	30315
14-0041-0002-037-2	418 Climax St SE	Atlanta	GA	30315
14-0041-0002-038-0	424 Climax St SE	Atlanta	GA	30315
14-0041-0002-045-5	425 Climax St SE	Atlanta	GA	30315
14-0041-0002-039-8	430 Climax St SE	Atlanta	GA	30315
14-0041-0002-044-8	431 Climax St SE	Atlanta	GA	30315
14-0041-0002-040-6	436 Climax St SE	Atlanta	GA	30315
14-0041-0002-043-0	437 Climax St SE	Atlanta	GA	30315
14-0041-0002-041-4	442 Climax St SE	Atlanta	GA	30315
14-0041-0002-042-2	443 Climax St SE	Atlanta	GA	30315

**Attachment, Certification for a Drug-Free Workplace (HUD-50070)
AHA-Owned Facilities and Land (as of February 10, 2014)**

Parcel ID	Address	City	State	Zip Code
17-0225-LL-052-5	1532 Craftsman Rd NW	Atlanta	GA	30318
14-0085-0013-115-0	330 Crumley St SW	Atlanta	GA	30312
14-0085-0013-088-9	376 Crumley St SW	Atlanta	GA	30312
14-0085-0013-085-5	390 Crumley St SW	Atlanta	GA	30312
14-0085-0013-084-8	394 Crumley St SW	Atlanta	GA	30312
14-0117-0003-061-0	940 Cunningham Pl	Atlanta	GA	30310
14-0081-0001-110-9	0 Curran St NW	Atlanta	GA	30318
14-0081-0004-107-2	0 Curran St NW	Atlanta	GA	30318
14-0041-0002-057-0	0 Dalton St SE	Atlanta	GA	30315
14-0041-0002-053-9	374 Dalton St SE	Atlanta	GA	30315
14-0041-0002-060-4	375 Dalton St SE	Atlanta	GA	30315
14-0041-0002-054-7	380 Dalton St SE	Atlanta	GA	30315
14-0041-0002-059-6	381 Dalton St SE	Atlanta	GA	30315
14-0041-0002-055-4	386 Dalton St SE	Atlanta	GA	30315
14-0041-0002-058-8	387 Dalton St SE	Atlanta	GA	30315
14-0041-0002-056-2	394 Dalton St SE	Atlanta	GA	30315
14-0045-0006-037-4	380 Decatur St SE	Atlanta	GA	30312
14-0075-0008-075-5	0 Doane St	Atlanta	GA	30312
17-0227-LL-003-6	590 Dobbs Circle	Atlanta	GA	30318
17-0227-LL-075-4	0 Drew Pl	Atlanta	GA	30318
15-180-03-023	380 East Lake Blvd SE	Atlanta	GA	30317
15-180-02-016	421 East Lake Blvd SE	Atlanta	GA	30317
15-180-03-025	457 East Lake Blvd SE	Atlanta	GA	30317
15-180-03-020	460 East Lake Blvd SE	Atlanta	GA	30317
14-0109-0005-061-8	170 Elm St SW *	Atlanta	GA	30314
14-0109-0005-076-6	178 Elm St SW	Atlanta	GA	30314
14-0109-0005-075-8	180 Elm St SW	Atlanta	GA	30314
14-0109-0005-074-1	Corner of Elm & Fair *	Atlanta	GA	30314
14-0041-LL-011-0	0 Englewood Ave SE	Atlanta	GA	30315
14-0041-LL-013-6	0 Englewood Ave SE	Atlanta	GA	30315
14-0041-LL-010-2	505 Englewood Ave SE	Atlanta	GA	30315
14-0041-LL-012-8	505 Englewood Ave SE	Atlanta	GA	30315
14-0109-0005-083-2	0 Fair St SW	Atlanta	GA	30314
14-0084-0005-041-9	605-607 Fair St SW	Atlanta	GA	30314
14-0084-0005-043-5	615 Fair St SW	Atlanta	GA	30314
14-0109-0005-062-6	653 Fair St SW	Atlanta	GA	30314
14-0109-0005-073-3	655 Fair St SW	Atlanta	GA	30314
14-0109-LL-013-5	668 Fair St SW	Atlanta	GA	30314
14-0055-0004-166-0	0 Fern Ave	Atlanta	GA	30315
14-0081-0004-104-9	0 Fifth St	Atlanta	GA	30305
14-0081-0004-105-6	0 Fifth St	Atlanta	GA	30305
14-0075-0001-078-6	0 Formwalt St SW	Atlanta	GA	30312
14-0075-0001-156-0	629 Formwalt St SW	Atlanta	GA	30312
14-0116-0010-082-8	0 Frank St	Atlanta	GA	30314
14-0116-0010-083-6	0 Frank St	Atlanta	GA	30314
14-0116-0010-084-4	928 Frank St	Atlanta	GA	30314
14-0116-0010-058-8	931 Frank St	Atlanta	GA	30314
14-0116-0010-059-6	937 Frank St	Atlanta	GA	30314
14-0116-0010-081-0	940 Frank St	Atlanta	GA	30314
14-0116-0010-060-4	941 Frank St	Atlanta	GA	30314
14-0116-0010-080-2	944 Frank St	Atlanta	GA	30314
14-0116-0010-061-2	945 Frank St	Atlanta	GA	30314
14-0116-0010-079-4	948 Frank St	Atlanta	GA	30314
14-0116-0010-078-6	952 Frank St	Atlanta	GA	30314
14-0116-0010-077-8	954 Frank St	Atlanta	GA	30314
14-0116-0010-076-0	960 Frank St	Atlanta	GA	30314
14-0116-0010-075-2	964 Frank St	Atlanta	GA	30314
14-0116-0010-074-5	968 Frank St	Atlanta	GA	30314
14-0116-0010-109-9	980 Frank St	Atlanta	GA	30314

**Attachment, Certification for a Drug-Free Workplace (HUD-50070)
AHA-Owned Facilities and Land (as of February 10, 2014)**

Parcel ID	Address	City	State	Zip Code
14-0085-LL-019-0	0 Fulton St	Atlanta	GA	30312
14-0085-LL-020-8	0 Fulton St	Atlanta	GA	30312
14-0085-LL-021-6	0 Fulton St	Atlanta	GA	30312
14-0045-0002-090-7	0 Gartrell St SE	Atlanta	GA	30312
14-0054-0003-075-5	0 Georgia Ave	Atlanta	GA	30312
14-0054-0002-082-2	142 Georgia Ave	Atlanta	GA	30312
14-0054-0002-083-0	174 Georgia Ave	Atlanta	GA	30312
14-0085-0013-101-0	0 Glenn St SW	Atlanta	GA	30312
14-0075-0001-159-4	254 Glenn St SW	Atlanta	GA	30312
14-0085-0013-102-8	1186 Glenn St SW	Atlanta	GA	30312
15-180-03-019	0 Glenwood Ave	Atlanta	GA	30317
14-0026-0001-073-7	0 Grange Dr	Atlanta	GA	30315
14-0026-0001-067-9	863 Grange Court	Atlanta	GA	30315
14-0054-0009-089-0	865 Grant Terrace	Atlanta	GA	30315
14-0082-0006-002-2	467 Gray St NW	Atlanta	GA	30318
14-0108-LL-025-0	565 Greensferry Road	Atlanta	GA	30314
14-0108-LL-023-5	600 Greensferry Road	Atlanta	GA	30314
14-0085-0009-083-6	19 Gregg St SW	Atlanta	GA	30312
17-0225-LL-015-2	0 Grove Park Pl NW	Atlanta	GA	30318
17-0225-LL-034-6	0 Grove Park Pl NW	Atlanta	GA	30318
17-0226-LL-019-3	0 Habershal Dr NW	Atlanta	GA	30318
14-0007-0013-019-9	1150 Henry Thomas Dr	Atlanta	GA	30315
14-0055-0006-065-2	0 Hill St SE	Atlanta	GA	30312
14-0045-LL-480-3	0 Hilliard St SE	Atlanta	GA	30312
14-0045-LL-481-1	0 Hilliard St SE	Atlanta	GA	30312
14-0045-LL-482-9	0 Hilliard St SE	Atlanta	GA	30312
14-0046-0010-204-3	15 Hilliard St SE	Atlanta	GA	30312
14-0045-0001-058-5	20 Hilliard St SE	Atlanta	GA	30312
14-0045-0001-059-3	20 Hilliard St SE	Atlanta	GA	30312
14-0045-LL-474-6	109 Hilliard St SE	Atlanta	GA	30312
14-0045-0001-057-7	110 Hilliard St SE	Atlanta	GA	30312
14-0045-LL-475-3	115 Hilliard St SE	Atlanta	GA	30312
14-0045-0006-036-6	126 Hilliard St SE	Atlanta	GA	30312
17-0251-LL-007-6	1580 Hollywood Rd NW	Atlanta	GA	30318
14-0085-LL-007-5	0 Humphries St	Atlanta	GA	30312
14-0085-LL-013-3	568 Humphries St	Atlanta	GA	30312
14-0079-0006-018-3	0 Hunnicutt St NW	Atlanta	GA	30313
14-0079-0006-019-1	0 Hunnicutt St NW	Atlanta	GA	30313
14-0079-0006-020-9	0 Hunnicutt St NW	Atlanta	GA	30313
14-0079-0006-021-7	0 Hunnicutt St NW	Atlanta	GA	30313
14-0079-0006-022-5	0 Hunnicutt St NW	Atlanta	GA	30313
14-0079-0006-023-3	0 Hunnicutt St NW	Atlanta	GA	30313
14-0085-0013-095-4	0 Ira St SW	Atlanta	GA	30312
14-0085-0013-096-2	0 Ira St SW	Atlanta	GA	30312
14-0085-0013-100-2	0 Ira St SW	Atlanta	GA	30312
14-0085-0013-092-1	579 Ira St SW	Atlanta	GA	30312
14-0085-0013-094-7	587 Ira St SW	Atlanta	GA	30312
14-0085-0013-097-0	595 Ira St SW	Atlanta	GA	30312
14-0085-0013-098-8	599 Ira St SW	Atlanta	GA	30312
14-0085-0013-099-6	603 Ira St SW	Atlanta	GA	30312
17-0259-LL-163-9	0 James Jackson Pkwy NW	Atlanta	GA	30318
14-0110-0009-021-5	81 James P. Brawley Dr NW	Atlanta	GA	30314
14-0110-0009-022-3	87 James P. Brawley Dr NW	Atlanta	GA	30314
14-0110-0009-023-1	91 James P. Brawley Dr NW	Atlanta	GA	30314
14-0110-0009-025-6	99 James P. Brawley Dr NW	Atlanta	GA	30314
14-0110-0009-024-9	93 - 95 James P. Brawley Dr NW	Atlanta	GA	30314
14-0110-0009-158-5	103-111 James P. Brawley Dr NW	Atlanta	GA	30314
14-0082-0006-008-9	0 John St	Atlanta	GA	30314
14-0082-0006-009-7	0 John St	Atlanta	GA	30314

**Attachment, Certification for a Drug-Free Workplace (HUD-50070)
AHA-Owned Facilities and Land (as of February 10, 2014)**

Parcel ID	Address	City	State	Zip Code
14-0082-0006-011-3	0 John St	Atlanta	GA	30314
14-0051-0009-151-1	230 John Wesley Dobbs Ave	Atlanta	GA	30303
17-0225-LL-038-4	0 Johnson Rd NW	Atlanta	GA	30318
17-0225-LL-039-2	0 Johnson Rd NW	Atlanta	GA	30318
17-0225-LL-040-0	0 Johnson Rd NW	Atlanta	GA	30318
17-0225-LL-025-1	1125 Johnson Rd NW	Atlanta	GA	30318
14-0027-LL-134-8	2291 Jonesboro Rd	Atlanta	GA	30315
14-0028-LL-061-2	2471 Jonesboro Rd	Atlanta	GA	30315
14-0116-0010-085-1	0 Joseph E. Lowery Blvd SW	Atlanta	GA	30310
14-0117-0003-013-1	0 Joseph E. Lowery Blvd SW	Atlanta	GA	30310
14-0110-0007-015-9	135 Joseph E. Lowery Blvd SW	Atlanta	GA	30310
14-0116-0010-086-9	285 Joseph E. Lowery Blvd SW	Atlanta	GA	30310
14-0116-0010-119-8	295 Joseph E. Lowery Blvd SW	Atlanta	GA	30310
14-0117-0003-054-5	325 Joseph E. Lowery Blvd SW	Atlanta	GA	30310
14-0117-0003-057-8	435 Joseph E. Lowery Blvd SW	Atlanta	GA	30310
14F-0029-LL-039-1	0 Kimberly Rd	Atlanta	GA	30331
14F-0029-LL-040-9	0 Kimberly Rd	Atlanta	GA	30331
14F-0029-LL-038-3	1371 Kimberly Rd	Atlanta	GA	30331
14F-0029-LL-041-7	1371 Kimberly Rd	Atlanta	GA	30331
14F-0029-LL-029-2	1381 Kimberly Rd	Atlanta	GA	30331
15-180-01-006	0 Lakeside Village Dr	Atlanta	GA	30317
14-0117-LL-001-0	406 Lawton St	Atlanta	GA	30310
14-0108-0007-049-2	0 Lee St SW	Atlanta	GA	30310
14-0005-0002-066-5	2413 Leila Lane	Atlanta	GA	30315
14-0047-0004-099-4	0 Linden Ave	Atlanta	GA	30308
14-0006-LL-065-9	2405 Locust Lane SE	Atlanta	GA	30315
17-0190-LL-040-1	0 Lois St NW	Atlanta	GA	30318
14-0117-0006-094-8	0 Lucile Ave	Atlanta	GA	30310
14-0117-0006-103-7	0 Lucile Ave	Atlanta	GA	30310
14-0079-0006-017-5	0 Luckie St NW	Atlanta	GA	30313
14-0079-0001-021-2	523 Luckie St NW	Atlanta	GA	30313
14-0110-0007-058-9	0 Magnolia St NW	Atlanta	GA	30314
14-0110-0009-003-3	760 Magnolia St	Atlanta	GA	30314
14-0110-0009-002-5	768 Magnolia St	Atlanta	GA	30314
14-0110-0007-056-3	892 Magnolia St	Atlanta	GA	30314
17-0048-LL-035-5	760 Marian Rd	Atlanta	GA	30324
17-0244-0001-029-8	2295 Marietta Rd NW	Atlanta	GA	30318
14-0053-0002-003-9	0 Martin St	Atlanta	GA	30312
14-0053-0002-067-4	0 Martin St	Atlanta	GA	30312
14-0053-0001-101-2	371 Martin St	Atlanta	GA	30312
14-0205-0001-076-3	2610 Martin Luther King Jr Dr SW	Atlanta	GA	30311
14-0085-LL-006-7	0 McDaniel St	Atlanta	GA	30312
14-0085-LL-028-1	0 McDaniel St	Atlanta	GA	30310
14-0085-LL-029-9	0 McDaniel St	Atlanta	GA	30310
14-0108-LL-002-9	365 McDaniel St	Atlanta	GA	30313
14-0086-0002-081-6	749 McDaniel St	Atlanta	GA	30310
14-0008-LL-016-0	0 McDonough Blvd	Atlanta	GA	30315
14-0008-LL-022-8	0 McDonough Blvd	Atlanta	GA	30315
14-0072-LL-043-5	0 Meldon Ave	Atlanta	GA	30315
15-180-02-018	0 Memorial Dr SE	Atlanta	GA	30317
14-0044-0001-109-7	0 Memorial Dr SE	Atlanta	GA	30312
14-0052-0008-040-6	0 Memorial Dr SE	Atlanta	GA	30312
14-0053-0002-066-6	0 Memorial Dr SE	Atlanta	GA	30312
14-0052-0008-034-9	22 Memorial Dr SE	Atlanta	GA	30312
14-0053-0002-001-3	175 Memorial Dr SE	Atlanta	GA	30312
14-0044-0001-016-4	341 Memorial Dr SE	Atlanta	GA	30312
14-0044-0001-108-9	359 Memorial Dr SE	Atlanta	GA	30312
14-0044-0001-101-4	361 Memorial Dr SE	Atlanta	GA	30312
14-0044-0001-099-0	363 Memorial Dr SE	Atlanta	GA	30312

**Attachment, Certification for a Drug-Free Workplace (HUD-50070)
AHA-Owned Facilities and Land (as of February 10, 2014)**

Parcel ID	Address	City	State	Zip Code
14-0044-0001-022-2	381 Memorial Dr SE	Atlanta	GA	30312
15-180-01-005	2143 Memorial Dr SE	Atlanta	GA	30317
14-0079-0002-024-5	0 Merritts Ave	Atlanta	GA	30313
14-0008-LL-015-2	1773 Moreland Ave	Atlanta	GA	30315
14-0072-LL-044-3	0 Moury Ave SE	Atlanta	GA	30315
14-0072-LL-045-0	0 Moury Ave SE	Atlanta	GA	30315
14-0072-LL-046-8	0 Moury Ave SE	Atlanta	GA	30315
14-0072-LL-047-6	0 Moury Ave SE	Atlanta	GA	30315
14-0072-LL-048-4	0 Moury Ave SE	Atlanta	GA	30315
14-0072-LL-049-2	0 Moury Ave SE	Atlanta	GA	30315
14-0072-LL-050-0	0 Moury Ave SE	Atlanta	GA	30315
14-0072-LL-051-8	0 Moury Ave SE	Atlanta	GA	30315
14-0072-LL-023-7	174 Moury St	Atlanta	GA	30315
14-0072-0006-089-1	0 New South Pryor Rd	Atlanta	GA	30315
14-0072-0006-095-8	1765 New South Pryor Rd	Atlanta	GA	30315
14-0047-0001-001-3	301 North Ave NE	Atlanta	GA	30354
14-0047-LL-001-5	361 North Ave NE	Atlanta	GA	30308
14-0081-0001-112-5	0 Northside Dr	Atlanta	GA	30318
17-0149-0008-125-3	0 Northside Dr	Atlanta	GA	30318
14-0044-0001-024-8	0 Oakland Ave SE	Atlanta	GA	30312
14-0044-0001-023-0	303 Oakland Ave SE	Atlanta	GA	30312
14-0108-0003-050-4	899 Park St SW	Atlanta	GA	30310
14-0110-LL-001-7	60 Paschal Blvd	Atlanta	GA	30314
14-0110-LL-003-3	60 Paschal Blvd	Atlanta	GA	30314
17-0111-0005-066-6	2240 Peachtree Rd NW	Atlanta	GA	30309
17-0227-LL-073-9	0 Perry Blvd NW	Atlanta	GA	30318
17-0227-LL-077-0	0 Perry Blvd NW	Atlanta	GA	30318
17-0227-LL-011-9	1800 Perry Blvd NW	Atlanta	GA	30318
17-0227-LL-026-7	1810 Perry Blvd NW	Atlanta	GA	30318
17-0228-LL-022-5	2000 Perry Blvd NW	Atlanta	GA	30318
17-0055-0002-018-8	1422 Piedmont Ave NE	Atlanta	GA	30309
17-0098-LL-062-8	3603 Piedmont Rd NE	Atlanta	GA	30305
14-0079-0002-010-4	0 Pine St NW	Atlanta	GA	30313
14-0079-0002-011-2	0 Pine St NW	Atlanta	GA	30313
14-0079-0002-012-0	0 Pine St NW	Atlanta	GA	30313
14-0079-0002-013-8	0 Pine St NW	Atlanta	GA	30313
14-0079-0002-014-6	0 Pine St NW	Atlanta	GA	30313
14-0072-0002-031-7	0 Pryor Rd SW	Atlanta	GA	30315
14-0072-LL-057-8	0 Pryor Rd SW	Atlanta	GA	30315
14-0072-LL-033-6	0 Pryor St SE	Atlanta	GA	30315
14-0072-LL-034-4	0 Pryor St SE	Atlanta	GA	30315
14-0072-LL-035-1	0 Pryor St SE	Atlanta	GA	30315
14-0072-LL-036-9	0 Pryor St SE	Atlanta	GA	30315
14-0072-LL-038-5	0 Pryor St SE	Atlanta	GA	30315
14-0072-LL-040-1	0 Pryor St SE	Atlanta	GA	30315
14-0072-LL-041-9	0 Pryor St SE	Atlanta	GA	30315
14-0072-LL-042-7	0 Pryor St SE	Atlanta	GA	30315
14-0072-LL-058-3	0 Pryor St SE	Atlanta	GA	30315
14-0072-0002-023-4	1531 Pryor Rd SW	Atlanta	GA	30315
14-0072-0002-007-7	1569 Pryor Rd SW	Atlanta	GA	30315
14-0072-0002-008-5	1599 Pryor Rd SW	Atlanta	GA	30315
14-0072-0002-012-7	1623 Pryor Rd SW	Atlanta	GA	30315
14-0075-0001-160-2	0 Ralph D. Abernathy Blvd SW	Atlanta	GA	30312
14-0053-0001-107-9	0 Rawson St	Atlanta	GA	30312
14-0053-LL-006-5	101 Rawson St	Atlanta	GA	30312
14-0085-0013-083-0	0 Ray Alley SW	Atlanta	GA	30312
14-0085-0013-113-5	0 Ray Alley SW	Atlanta	GA	30312
14-0076-0007-118-3	250 Richardson St	Atlanta	GA	30312
17-0190-LL-035-1	0 Rockdale St NW	Atlanta	GA	30318

Attachment, Certification for a Drug-Free Workplace (HUD-50070)
AHA-Owned Facilities and Land (as of February 10, 2014)

Parcel ID	Address	City	State	Zip Code
14-0033-0001-054-8	3698 Ruby H Harper Blvd	Atlanta	GA	30354
14-0073-LL-008-7	1463 S Pryor Rd	Atlanta	GA	30315
14-0072-0002-010-1	1543-1549 S Pryor Rd	Atlanta	GA	30315
14-0072-0002-033-3	1543-1549 S Pryor Rd	Atlanta	GA	30315
14-0117-0003-019-8	0 Sells Ave SW	Atlanta	GA	30310
14-0110-0005-089-6	791 Spencer St NW	Atlanta	GA	30314
14-0110-0005-021-9	797 Spencer St NW	Atlanta	GA	30314
14-0110-0005-022-7	801 Spencer St NW	Atlanta	GA	30314
14-0110-0004-059-0	835 Spencer St NW	Atlanta	GA	30314
14-0110-0004-060-8	843 Spencer St NW	Atlanta	GA	30314
14-0110-0004-048-3	847 Spencer St NW	Atlanta	GA	30314
14-0110-0004-056-6	855 Spencer St NW	Atlanta	GA	30314
14-0110-0004-057-4	859 Spencer St NW	Atlanta	GA	30314
14-0110-0004-015-2	883 Spencer St NW	Atlanta	GA	30314
14-0110-0004-016-0	887 Spencer St NW	Atlanta	GA	30314
14-0110-0004-018-6	895 Spencer St NW	Atlanta	GA	30314
14-0079-0003-075-6	0 Techwood Dr	Atlanta	GA	30313
17-0106-0009-118-8	150 Tenth St NE	Atlanta	GA	30309
14-0026-0005-026-1	0 Thomasville Blvd	Atlanta	GA	30315
14-0026-0005-027-9	0 Thomasville Blvd	Atlanta	GA	30315
14-0026-LL-051-5	0 Thomasville Blvd	Atlanta	GA	30315
14-0110-0005-006-0	804 Thurmond St NW	Atlanta	GA	30314
14-0110-0004-053-3	834 Thurmond St NW	Atlanta	GA	30314
14-0110-0004-054-1	838 Thurmond St NW	Atlanta	GA	30314
14-0110-0004-064-0	842 Thurmond St NW	Atlanta	GA	30314
14-0110-0004-061-6	846 Thurmond St NW	Atlanta	GA	30314
14-0110-0004-062-4	850 Thurmond St NW	Atlanta	GA	30314
14-0007-0005-025-6	0 Velma St	Atlanta	GA	30315
14-0084-0005-090-6	136 Vine St	Atlanta	GA	30314
14-0084-0005-091-4	138 Vine St	Atlanta	GA	30314
14-0084-0005-051-8	140 Vine St	Atlanta	GA	30314
14-0084-0005-050-0	146 Vine St	Atlanta	GA	30314
14-0084-0005-049-2	152 Vine St	Atlanta	GA	30314
14-0084-0005-048-4	158 Vine St	Atlanta	GA	30314
14-0084-0005-095-5	162 Vine St	Atlanta	GA	30314
14-0084-0005-096-3	162 Vine St	Atlanta	GA	30314
14-0084-0005-046-8	168 Vine St	Atlanta	GA	30314
14-0084-0005-044-3	172 Vine St	Atlanta	GA	30314
14-0084-0005-034-4	175 Walnut St	Atlanta	GA	30314
14-0117-0005-061-8	0 West End Pl SW	Atlanta	GA	30310
14-0116-0010-027-3	0 Westview Dr SW	Atlanta	GA	30310
14-0116-0010-093-5	0 Westview Dr SW	Atlanta	GA	30310
14-0116-0010-096-8	0 Westview Dr SW	Atlanta	GA	30310
14-0116-0010-099-2	0 Westview Dr SW	Atlanta	GA	30310
14-0116-0010-114-9	0 Westview Dr SW	Atlanta	GA	30310
14-0117-0002-003-3	0 Westview Dr SW	Atlanta	GA	30310
14-0117-0002-007-4	0 Westview Dr SW	Atlanta	GA	30310
14-0117-0002-008-2	0 Westview Dr SW	Atlanta	GA	30310
14-0117-0002-014-0	0 Westview Dr SW	Atlanta	GA	30310
14-0117-0003-008-1	0 Westview Dr SW	Atlanta	GA	30310
14-0117-0003-010-7	926 Westview Dr SW	Atlanta	GA	30310
14-0117-0003-009-9	930 Westview Dr SW	Atlanta	GA	30310
14-0116-0010-089-3	931 Westview Dr SW	Atlanta	GA	30310
14-0116-0010-090-1	935 Westview Dr SW	Atlanta	GA	30310
14-0117-0003-007-3	938 Westview Dr SW	Atlanta	GA	30310
14-0116-0010-091-9	939 Westview Dr SW	Atlanta	GA	30310
14-0117-0003-064-4	940 Westview Dr SW	Atlanta	GA	30310
14-0116-0010-092-7	943 Westview Dr SW	Atlanta	GA	30310
14-0117-0003-004-0	944 Westview Dr SW	Atlanta	GA	30310

**Attachment, Certification for a Drug-Free Workplace (HUD-50070)
AHA-Owned Facilities and Land (as of February 10, 2014)**

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

* AHA provides grounds maintenance but does not own these parcels.

7. Public Review and Plan Changes

Public Review

Atlanta Housing Authority's (AHA) Fiscal Year 2015 Moving to Work (MTW) Annual Implementation Plan is the product of an inclusive annual planning process involving consultation with AHA's Board of Commissioners, executive leadership and employees, as well as AHA-assisted families. AHA further collaborates with strategic partners and service providers, state and local agencies, elected and public officials, as well as local community and housing advocacy organizations.

The Notice of the FY 2015 MTW Annual Plan Availability and Public Hearing was communicated externally via letters, newsletters and notices to stakeholders and AHA-assisted families, and through advertisements placed in the following mass media publications on dates as specified below:

The Atlanta Journal-Constitution

February 16, 2014
March 2, 2014

Atlanta Daily World

February 20, 2014

The Atlanta Voice

February 21, 2014

Fulton County Daily Report

February 18, 2014
February 25, 2014
March 4, 2014

Mundo Hispanico

February 20, 2014

The Champion Newspaper

February 20, 2014
February 27, 2014

Additionally, to address the diversity of AHA residents in the AHA-Owned Residential Communities, the public hearing notice was distributed in English, Chinese, Korean, Russian and Spanish.

On Wednesday, March 5, 2014, AHA held a Public Hearing of the FY 2015 MTW Annual Plan to present its proposed Plan and policy changes. The public hearing was held at AHA's corporate office (230 John Wesley Dobbs Avenue, Atlanta, Georgia), where 84 people attended. For elderly and disabled residents living in the AHA-Owned Residential Communities who were unable to attend the public hearing, AHA broadcast a video of the event on AHA's local community channel until the public comment period closed. The broadcast video incorporated sign-language interpretation.

The comment and review period for the draft FY 2015 MTW Annual Plan was February 12, 2014 through March 13, 2014. The Plan was made available in printed form at AHA's corporate office and AHA-Owned Residential Communities and electronically via AHA's website. Additionally, printed and electronic copies were provided to organizations that participated in briefing sessions, as listed below. Comments could be submitted in-person at the hearing or briefing, by letter (in person at AHA's corporate office, U.S. Post Office or fax), via the website, email, or voicemail.

During the public review period ended March 13, 2014, comments and suggestions were received by AHA and were considered in the final version of the Plan as presented for approval by the AHA Board of Commissioners.

Plan Changes

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

BRIEFING SESSIONS FOR FY 2015 MTW ANNUAL PLAN	
February 18, 2014	<p>HUD Atlanta Field Office</p> <p>Local Elected and Public Officials</p> <ul style="list-style-type: none"> • Atlanta City Council • Atlanta Board of Education • Atlanta Police Department • MARTA <p>AHA Property Management and Development Partners (PMDs)</p>
February 20, 2014	<p>Atlanta Legal Aid Society</p> <p>Georgia Law Center for the Homeless</p>
February 21, 2014	<p>Jurisdiction-wide Resident Council</p>
February 27, 2014	<p>City of Atlanta Department of Planning & Community Development</p> <p>Enterprise Community Partners, Inc.</p> <p>Invest Atlanta</p>
March 5, 2014	<p>Public Hearing</p>

Appendix C: Ongoing Activities Directory (FY 2005 - FY 2014)

The Atlanta Housing Authority's (AHA) Ongoing Activities Directory addresses the HUD Form 50900 requirement by listing activities, initiatives and policies identified in AHA's MTW Annual Implementation Plans ("MTW Annual Plans") since FY 2005. Per AHA's MTW Agreement with HUD on September 23, 2003, the initial period of which was effective from July 1, 2003 through June 30, 2010, and the executed Amended and Restated MTW Agreement, effective as of November 13, 2008, and further amended by that certain Second Amendment to the Moving to Work Agreement, effective as of January 16, 2009, once HUD approves AHA's MTW Annual Plan, the approval is deemed to be cumulative and remains in effect for the duration of the Amended and Restated MTW Agreement period, as it may be extended from time to time. This directory summarizes activities/initiatives/policies that AHA has operationalized and incorporated in its business model.

Status Key:

(Year in parentheses indicates fiscal year the related status was achieved.)

O	Operationalized	Activity is ongoing and continues to be implemented as part of AHA's normal business operations.
P	Postponed	Activity was not completed during the planning period or was postponed from full implementation.
C	Completed	Projects have been completed based on established beginning and end dates. Relevant learning has been operationalized where applicable.
D	Discontinued	Activity was discontinued from further implementation; may be renewed if conditions warrant.

NO.	Supporting Activity / Project / Initiative	MTW Plan Year	Current Status
1	\$125 Minimum Rent NOTE: During FY 2005-2007, this activity was referred to as "Minimum Rent."	2005	O
2	30% of Adjusted Income	2008	O
3	4 to 1 Elderly Admissions Policy at AHA's High-Rise Communities NOTE: In FY 2005, this activity was referred to as the "Elderly Admissions Preference Policy at AHA's Senior High-Rises."	2005	O
4	Accessibility and 504 / ADA NOTE: See Enhanced Accessibility Initiative	2005	O
5	Acquisitions NOTE: During FY 2005 to FY 2009, this activity was captured under Real Estate Development and Acquisitions.	2005	O
6	Administration of HCVP Waiting List NOTE: From FY 2007-FY2010, this activity was referred to as "Intake / Waitlist Re-engineering (Housing Choice Supporting Projects - Participant Services)."	2007	O
7	Affordable Assisted Living Demonstration NOTE: During FY 2005, FY 2006, FY 2007 & FY 2010, this activity was referenced in several ways: "Affordable Assisted Living Demonstration Program", "Developing Supportive Housing" and "Alternative and Supportive Housing" (includes Affordable Assisted Living and Service-Enriched Housing.	2005	O
8	Affordable Fixed Rent	2003	O
9	Affordable Flat Rent Demonstration	2005	P (2009)
10	Aging Well Program	2011	O
11	AHA Annual Budget and Previous Year's Expenditures	2005	O
12	AHA Submarket Payment Standards NOTE: In FY 2006, this activity was referred to as "Housing Choice Fair Market Rent Standards."	2006	O
13	AHA4You Customer and Community Relations NOTE: See Customer Community Relations Center	2008	O
14	Annual Contributions Contract Waiver	2004	O
15	Annual Recertification Re-engineering (Housing Choice Supporting Projects - Participant Services)	2008	O
16	ARRA Funds	2010	C (2012)
17	Asset Management Systems	2006	O
18	Asset Management Under the New Operating Subsidy Rule	2008	O
19	Atlanta Community Scholars Awards (ACSA)	2006	O
20	Automated Collections Process (Re-engineering Housing Choice Operations)	2008	P (2008)

NO.	Supporting Activity / Project / Initiative	MTW Plan Year	Current Status
21	Automated Hearing Database (Housing Choice Supporting Projects - Participant Services)	2008	0
22	Automated Outbound Portability Billing (Housing Choice Supporting Projects - Participant Services) NOTE: See Port Administration Re-engineering	2009	0
23	Business Transformation	2010	0
24	CATALYST Resource Guide	2006	0
25	Choice Neighborhoods Implementation Grant	2013	0
26	Clean and Safe Environment Requirement	2005	0
27	Client Education Seminars	2007	0
28	Client Services NOTE: See Human Development Services	2005	0
29	Comcast Cable Partnership	2006	0
30	Communications Plan NOTE: See Media Management	2006	0
31	Comprehensive Graduation Program	2012	0
32	Comprehensive Homeownership Program	2007	0
33	Consulting Services	2013	0
34	Contract Administration NOTE: See Fee-Based Contract Administration	2006	0
35	Corporate Culture Project NOTE: In FY 2006, this activity was referred to as the "Corporate Culture Plan."	2006	0
36	Customer Community Relations Center NOTE: From FY2008-FY2011, this initiative was referred to as "AHA4You Customer Community Relations."	2008	0
37	Deconcentration Strategy NOTE: In FY 2005, this initiative was discussed under "Using the Housing Choice Vouchers to Provide Income-Eligible Families with Access to Communities of Opportunity."	2005	0
38	Developing Alternative & Supportive Housing Resources NOTE: In FY 2010, this category included: "John O. Chiles Annex Supportive Housing Pilot", "Permanent Designated Housing", and "Affordable Assisted Living Demonstration." In FY 2006, this activity was listed as two separate activities: 1. "Developing Alternative Housing Resources" & 2. "Developing Supportive Housing."	2005	0
39	Document Management Automation NOTE: In FY 2011, this activity was referred to as "File Purge and E-Copy." In FY 2010, was listed under "Housing Choice Supporting Projects - Program Support."	2007	0
40	Early Childhood Learning Initiative	2012	0
41	Elderly Designated Housing NOTE: From FY 2008-2012, this activity was referred to as "Designation of Elderly and Disabled Public Housing Units."	2008	0
42	Elderly Income Disregard	2005	0
43	Endowment Fund for Human Development Services	2013	0
44	Energy Management Initiative NOTE: In FY 2008 and FY 2009, this activity was referred to as "Energy Performance Contracting."	2008	0
45	Enhanced Accessibility Initiative NOTE: In FY 2007-2011, this activity was also known as the "Voluntary Compliance Agreement (VCA)."	2007	0
46	Enhanced Business Systems (Lease / Family Obligation Document Enforcement, Enhanced Criminal Screening and Health and Safety Standards)	2006	0
47	Enhanced Housing Marketing NOTE: See Housing Marketing	2008	0
48	Enhanced Inspection Standards NOTE: In FY 2010, was referred to as Inspections (Housing Choice Supporting Projects - Housing Assistance Payments Contracting). From FY 2005-2009, this activity was referred to as "Enhanced Real Estate Inspection Systems."	2005	0
49	Enhanced Relocation Procedures and Database Enhancements NOTE: In FY 2006-2008, this activity was referred to as "Enhanced Relocation Process and Database Enhancements."	2006	0
50	Enterprise Resource Planning (ERP) Solution NOTE: In FY 2011-2012, this activity was referred to as "Integrated Enterprise Resource Planning (ERP) Solution"; In FY 2010-2011, was described as the "Comprehensive Integrated and Relational Agency-wide Database."	2010	0
51	Expand Supportive Housing Initiatives	2014	0
52	Fee-Based Contract Administration NOTE: In FY 2006, this activity was referred to as "Contract Administration."	2006	0
53	Fee-For-Service Methodology	2006	0
54	Financial Management NOTE: In FY 2010, this activity was listed under "Housing Choice Supporting Projects - Financial and Business Operations."	2010	0
55	Financial Operations	2005	0
56	Gap Financing	2011	0

NO.	Supporting Activity / Project / Initiative	MTW Plan Year	Current Status
57	Good Neighbor Program II NOTE: During FY 2006, this activity was referenced under "Program Participation Requirement."	2005	O
58	Homeownership Standards NOTE: See Comprehensive Homeownership Program	2006	O
59	Housing Assistance Payments (HAP) Contract Update NOTE: Also called AHA's Housing Choice Rental Assistance (HCRA) Agreement	2013	O
60	Housing Choice Budget Utilization Benchmark	2005	O
61	Housing Choice Community Advisory Group (Financial and Business Operations)	2010	O
62	Housing Choice Fair Market Rent Standards NOTE: See AHA Submarket Payment Standards	2006	O
63	Housing Choice Family Self-Sufficiency (FSS) Program Re-engineering	2007	C (2008)
64	Housing Choice Fixed Subsidy Initiative	2007	O
65	Housing Choice Inspection Fees	2006	P (2008)
66	Housing Choice Landlord Certification and Training	2006	P (2008)
67	Housing Choice Operating System (Housing Choice Supporting Projects - Financial and Business Operations)	2010	O
68	Housing Choice Voucher Program HAP Abatement Policy	2011	O
69	Housing Choice Voucher Related MTW Income	2005	O
70	Housing Marketing NOTE: In FY 2008, this activity was referred to as "Enhanced Housing Marketing."	2008	O
71	Human Development Life-cycle Strategies	2013	O
72	Human Development Services NOTE: From FY 2005-2011, was referenced in several ways: "Client Services", "Human Services Management", and "Human Development & Support Services."	2005	O
73	Human Resources Development NOTE: During FY 2008-2009, this activity was referred to as "Organizational Initiatives."	2006	O
74	Human Services Management NOTE: See Human Development Services	2006	O
75	Identity of Interest (IOI) Implementation Protocol	2008	O
76	Individual Development Accounts (IDAs)	2005	P (2009)
77	Innovative Subsidy Strategies for AHA's Affordable Communities providing Housing for Seniors and Residents with Disabilities	2008	O
78	John O. Chiles Annex Supportive Housing Pilot NOTE: In FY 2008 and 2009, this initiative was discussed under "Project Based Rental Assistance as a Development Tool: Developing Alternative and Supportive Housing Resources."	2008	O
79	Landlord Eligibility and Performance Standards	2012	O
80	Landlord Relationship Management (Housing Choice Supporting Projects - Landlord Services)	2010	O
81	Leasing Incentive Fee (LIF)	2008	O
82	Local Asset Management Program (LAMP)	2010	O
83	Long-term Strategic Planning	2013	O
84	Low Income Operating Subsidy and Related Income	2007	O
85	Mark-to-Market Program	2006	O
86	Master Database of Real Estate Owned Portfolio	2012	O
87	Media Management NOTE: In FY 2006-2008, this activity was referred to as "Communications Plan."	2006	O
88	Mixed Income Communities "Working Laboratory Initiative" NOTE: See Private Sector Innovation	2006	O
89	MTW Benchmarking Study	2005	O
90	MTW Mixed-Finance Closing Procedures Protocol	2005	O
91	Next Generation Solutions Project NOTE: In FY 2010 Plan, this activity was referred to as "Housing Choice Operating System (Housing Choice Supporting Projects- Financial and Business Operations)."	2006	O
92	Non-Elderly Disabled Income Disregard	2011	O
93	Operational Enhancements (Housing Choice Supporting Projects - Housing Assistance Payments Contracting)	2010	O
94	Organizational Capabilities including AHA University NOTE: See Human Resources Development	2013	O
95	Organizational Initiatives	2006	O

NO.	Supporting Activity / Project / Initiative	MTW Plan Year	Current Status
96	Oversight of Turnkey III Assets NOTE: <i>During FY 2006, this activity was referred to as "Close-out of the Turnkey of Homebuyers Program."</i>	2006	C (2009)
97	Participant Relationship Management (Housing Choice Supporting Projects - Participant Services)	2010	O
98	Performance-based Inspections for Multi-family Properties NOTE: <i>See Enhanced Inspection Standards</i>	2012	O
99	Permanent Designated Housing NOTE: <i>In FY 2005, this activity was referred to as "Designated Housing."</i>	2005	O
100	Place-Based and People-Based De-concentration Plan / Strategy NOTE: <i>See Deconcentration Strategy</i>	2005	O
101	Place-Based Supportive Services Strategy Pilot	2006	O
102	Policy Changes (Housing Choice Supporting Projects - Participant Services)	2010	O
103	Port Administration Re-engineering NOTE: <i>During FY 2006-FY 2008, this activity was referred to as "AHA Standards and Incoming / Outgoing Ports." in FY 2009, was referred to as "Automated Outbound Portability Billing." In FY 2010, was referred to as "Port Administration (Housing Choice Supporting Projects - Financial and Business Operations)."</i>	2006	O
104	Pre-Qualification of Units (Re-engineering Housing Choice Operations)	2008	P (2009)
105	Pre-Relocation Client Education	2008	C (2010)
106	Private Sector Innovation NOTE: <i>In FY 2006-2007, this activity was referred to as Mixed-Income Communities "Working Laboratory Initiative."</i>	2006	O
107	Process for Project Based Rental Assistance Developer Selection	2008	O
108	Procurement Enhancements	2008	O
109	Program Flexibility for Special Purpose Vouchers Protocol	2008	O
110	Program Moves (Housing Choice Supporting Projects - Participant Services) NOTE: <i>In FY 2006, this activity was referred to as "Voucher Administration Reform: Residential Moves."</i>	2006	O
111	Program Performance Indicators (Housing Choice Supporting Projects - Program Support)	2009	O
112	Project Based Accounting and Financial Systems	2006	O
113	Project Based Rental Assistance as a Strategic Tool NOTE: <i>During FY 2008-2012, this activity was referred to as "Project Based Rental Assistance as a Development Tool"; FY 2005-2007, was referred to as "Project Based Voucher as a Development Tool."</i>	2005	O
114	Project Based Rental Assistance for Supportive Housing NOTE: <i>In FY 2012, this activity was referred to as "Project Based Rental Assistance Homeless, Mental Health and Special Needs Demonstration." During FY 2006-2011, this activity was captured under "Developing Alternative and Supportive Housing Resources."</i>	2006	O
115	Project Based Rental Assistance Inside of Mixed Income Communities NOTE: <i>During FY 2006, this activity was referred to as "Project Based Voucher as a Development Tool."</i>	2006	O
116	Project Based Rental Assistance Mental Health Demonstration NOTE: <i>See Project Based Rental Assistance for Supportive Housing</i>	2006	O
117	Project Based Rental Assistance Regional Expansion Program	2008	O
118	Project Based Rental Assistance Site Based Administration NOTE: <i>In FY 2007, this activity was referred to as "Project Based Voucher On-Site Administration." In FY 2006, activity was referred to as "Voucher Administration Reform: On-Site Administration."</i>	2008	O
119	Project Based Rental Assistance Site & Neighborhood Standards	2008	O
120	Project Based Rental Assistance Special Needs Demonstration Program NOTE: <i>See Project Based Rental Assistance for Supportive Housing</i>	2006	O
121	Project Based Voucher as a Development Tool NOTE: <i>See Project Based Rental Assistance as a Strategic Tool</i>	2005	O
122	Project Based Voucher On-Site Administration (Housing Choice Voucher Administration Reform) NOTE: <i>See Project Based Rental Assistance Site Based Administration</i>	2007	O
123	Proposed Land Transactions and Sale of Assets NOTE: <i>In FY 2010-2012, this activity was referred to as "Proposed Land Swaps." FY 2006-2009, activity was captured in Real Estate Development and Acquisitions acquisition strategy for communities undergoing revitalization.</i>	2006	O
124	Quality of Life (QLI) Initiative	2007	C (2010)
125	Rapid Response Team NOTE: <i>In FY 2008, this initiative was referred to as the "Rapid Response Assistance Team."</i>	2008	O
126	Re-engineering Property Owner / Vendor Process (Re-engineering Housing Choice Operations)	2008	O
127	Re-engineering the Housing Choice Voucher Program NOTE: <i>From FY 2007-2010, was referred to as "Re-engineering Housing Choice Operations."</i>	2007	O

NO.	Supporting Activity / Project / Initiative	MTW Plan Year	Current Status
128	Reformulating the Subsidy Arrangement in AHA-Sponsored Mixed-Income, Mixed-Finance Communities including Centennial Place NOTE: From FY 2006-2010, this initiative was referred to as "Sustaining Mixed Income Investments." In FY 2005, was referred to as "Sustaining Investments in Mixed-Income, Mixed-Finance Communities."	2005	O
129	Relocation Policies (Re-engineering Housing Choice Operations)	2007	O
130	Rent Reasonableness NOTE: During FY 2007, this activity was referred to as the "Automated Rent Reasonableness System."	2007	O
131	Rent Simplification / AHA Standard Deductions	2008	O
132	Re-Occupancy Process	2008	O
133	Replacement Housing Factor Funds	2008	O
134	Reposition and Expand Property Management Strategy for AHA-Owned Residential Communities	2013	O
135	Resident Survey	2004	O
136	Resource Development to Support Family Success	2011	O
137	Responsible Relocation NOTE: In FY 2006, was referred to as "Enhanced Relocation Process."	2006	O
138	Revitalization Program NOTE: Starting in FY 2008, this program was referred to as "Revitalization Program." In FY 2005, was referred to as "Repositioning Portfolio" and "Real Estate Development and Acquisitions."	2005	O
139	School Attendance Requirement	2006	O
140	Service Provider Network	2006	O
141	Setting Market Rents Under Housing Choice; Fixed Subsidy NOTE: See AHA Submarket Payment Standards and Rent Reasonableness	2005	O
142	Single Family Home Rental Demonstration NOTE: In FY 2012, this activity was referred to as "Neighborhood Stabilization Demonstration Program."	2012	O
143	Single Family Unit Residency / Homeownership Standards NOTE: See Standards for Residency in Single Family Homes	2006	O
144	Staff Capacity (Housing Choice Supporting Projects - Participant Services)	2010	O
145	Stakeholder Education and Engagement Initiative NOTE: See Communications Plan	2013	O
146	Standards for Residency in Single Family Homes NOTE: In FY 2006, this activity was referred to as "Single Family Unit Residency/Homeownership Standards."	2006	P (2008)
147	Statement of Corporate Policies (SCP) Governing the Leasing and Residency of Assisted Apartments (Statement of Corporate Policies)	2005	O
148	Statement of Policies for Supportive Housing	2012	O
149	Statement of Policies Governing the Housing Choice Tenant-Based Program (Statement of Housing Choice Policies) NOTE: During FY 2007-2008, this policy was referred to as the "Administrative Plan."	2005	O
150	Streamlining Property-Level Operations NOTE: In FY 2005, this activity was discussed under "Sustaining Investments in Mixed-Income, Mixed-Finance Communities."	2005	O
151	Subsidy Conversion NOTE: In FY 2005, this activity was discussed under "Real Estate Development and Acquisitions" Also see Innovative Subsidy Strategies for AHA's Affordable Communities providing Housing for Seniors and Residents with Disabilities	2005	O
152	Subsidy Layering Review and Approval	2010	O
153	Supportive Services for Persons with Mental Disabilities NOTE: In FY 2012, this activity was referred to as "Proposal for Supportive Services."	2012	O
154	Tax Credit Compliance Model NOTE: See Streamlining Property-Level Operations	2005	O
155	Technology Solutions (Housing Choice Supporting Projects - Housing Assistance Payments Contracting & Landlord Services)	2010	O
156	Technology Solutions (Housing Choice Supporting Projects - Participant Services) NOTE: See Housing Choice Operating System (Housing Choice Supporting Projects - Financial and Business Operations)	2007	O
157	Thriving Family Index	2012	O
158	Transforming All Conventional Public Housing Assisted Communities to Market Rate, Mixed-Income Communities NOTE: See Revitalization Program	2005	O
159	Utility Assistance Payment (UAP) Bankcards (Housing Choice Supporting Projects - Program Support)	2008	O

NO.	Supporting Activity / Project / Initiative	MTW Plan Year	Current Status
160	Use of MTW Funds	2009	O
161	Utility Allowance Waiver	2007	D (2010)
162	Veterans Supportive Housing	2013	O
163	Video Call Down System	2005	D (2011)
164	Violence Against Women Act (VAWA)	2007	O
165	Work/Program Requirement <i>NOTE: Starting FY 2012, the program was referred to as "Work/Program Requirement." During FY 2005-2011, this program was referenced in several ways: "Program Participation Requirement," "Work/Program Participation Requirement," and "Work Requirement."</i>	2005	O

1. Households Served Projections

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

Community & Program Type	Type of Assistance ⁽⁵⁾	Household Totals	
		Projected End of FY 2014	Projected End of FY 2015
AHA-Owned Residential Communities	PH	1,942	1,942
AHA-Sponsored Mixed-Income Communities	PH ⁽⁶⁾	2,221	2,221
	PBRA ⁽⁶⁾	1,710	1,770
	LIHTC-only ⁽⁶⁾	1,151	1,151
PBRA Developments	PBRA ⁽⁶⁾	3,089	3,139
	LIHTC-only ⁽⁶⁾	1,644	1,644
Housing Choice Tenant-Based ⁽²⁾	HCV	7,536	7,612
Housing Choice Ports ⁽³⁾	HCV	2,205	2,145
Housing Choice Homeownership	HCV	59	59
Homeownership - Other ⁽⁴⁾	Down payment	300	310
TOTAL ⁽¹⁾		21,857	21,993

NOTES:

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

* Sources: FY 2013 MTW Annual Report, FY 2014 MTW Annual Implementation Plan.

⁽¹⁾ Supportive Housing Programs are counted in all categories.

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

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

⁽⁴⁾ Homeownership - Other category includes down payment assistance through AHA's Builders/Owners Initiative or through AHA's Revitalization Program.

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

⁽⁶⁾ Changes in PH, PBRA and LIHTC-only are due to added units and shifts between types of assistance on a unit within a community (includes reformulation initiative at Centennial Place).

2. Household Characteristics (actuals as of June 30, 2013)

Community & Program Type	Number of Households								
	by Unit/Family Size					by Income Group (percent of Area Median Income (AMI))			
	0/1	2	3	4	>4	<30%	30-50%	50-80%	>80%
AHA-Owned Residential Communities	1,838	46	20	29	0	1,629	267	30	7
AHA-Sponsored Mixed-Income Communities ⁽²⁾⁽³⁾	1,621	1,421	551	57	0	1,586	1,462	574	28
PBRA Developments ⁽²⁾	1,580	999	167	5	0	1,243	1,088	420	0
Housing Choice Tenant-Based	1,410	2,340	2,382	753	158	4,969	1,631	423	20
Housing Choice Ports	281	745	949	245	45	1,751	430	77	7

NOTES:

⁽¹⁾ *Elderly Household = head-of-household, spouse, or sole adult member is age 62 years or older. Disabled Household = head-of-household, spouse, or sole adult member is age 18-61 years and has a verified disability. Other = all other households.*

⁽²⁾ *AHA does not capture household characteristics for LIHTC-only units within AHA-Sponsored Mixed-Income Communities and PBRA Developments. Totals also do not include Supportive Housing units in PBRA developments.*

⁽³⁾ *Numbers shown do not include data for Veranda at Scholars Landing as this development had not reached stabilized occupancy as of June 30, 2013.*

3. Waiting List Characteristics (actuals as of June 30, 2013)

Community & Program Type	# Waiting List Households by Percent Area Median Income (AMI)				# Waiting List Households by Bedroom Size Requested					# Waiting List Households by Family Size (# of Members)					
	<30%	30-50%	51-80%	>80%	Studio	1 BR	2 BR	3 BR	4+ BR	1	2	3	4	5+	TOTAL
AHA-Owned Residential Communities	2,279	251	21	4	449	1,770	228	65	43						2,555
AHA-Sponsored Mixed-Income Communities ⁽¹⁾	12,297	8,536	1,653	74	0	6,216	9,756	5,804	784						22,561
PBRA Developments ⁽²⁾	1,909	3,566	898	0	0	2,066	2,887	1,414	6						6,373
Housing Choice ⁽³⁾ Tenant-Based	642	223	18	0						161	201	247	142	132	883
TOTAL	17,128	12,576	2,590	78	449	10,052	12,871	7,284	833	161	201	247	142	132	32,372

NOTES:

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

⁽¹⁾ Numbers shown do not include data for Veranda at Scholars Landing as this development had not reached stabilized occupancy as of June 30, 2013.

⁽²⁾ Numbers shown do not include data for Supportive Housing communities that are leased through referrals from a contracted service provider that provides supportive services to the target population.

⁽³⁾ AHA does not capture waiting list data on the Mainstream waiting list and does not maintain FUP or VASH waiting lists, because these special purpose vouchers are issued through referrals from the public child welfare agency (PCWA) under agreement with AHA or the Veterans Administration, respectively.

4. PH and PBRA Units to be Added or Removed (during FY 2015)

		Units by Bedroom Size					
Community	Type of Assistance	Studio	1 BR	2 BR	3 BR	4+ BR	TOTAL Units
Oasis at Scholars Landing	PBRA		60				60
TBD (new Supportive Housing)	PBRA						50
TOTAL		0	60	0	0	0	110

*NOTE:
No PH or PBRA units are projected to be removed during FY 2015.*

5. Leasing and Waiting List Information

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

Community & Program Type	Potential Issues Leasing Units	Potential Changes in Waiting Lists
AHA-Owned Residential Communities	AHA does not expect to experience any issues when leasing units.	<p>AHA engages in recurring dialog with its Property Manager-Developer (PMD) partners to ensure that they maintain adequate and appropriate waiting lists to optimize community occupancy at AHA-Owned Residential Communities. Operating procedures relative to waiting lists are working well and will continue in FY 2015.</p> <p>AHA does not anticipate any significant changes to the number of families on the waiting list.</p>
AHA-Sponsored Mixed-Income Communities, PBRA Developments, & Supportive Housing	The Owners and Management Agents are responsible for all aspects of leasing and occupancy of the assisted units. While it is difficult to project any potential leasing issues, AHA's Asset Management group, through its Portfolio Management function, will continue to monitor the performance benchmarks for the entire portfolio and work with the Owners and Management Agents to address any adverse trends.	<p>The waiting list at these communities are administered at the sites by the respective Owners and Management Agents. Each is responsible for the opening, closing, ongoing maintenance and purging the site-based waiting list pursuant to their business needs and as defined in their management procedures.</p> <p>AHA is not able to assess the potential change in the number of families on the waiting list since the Owners and Management Agents may, at any time, decide to open or purge the site-based waiting list.</p>
Housing Choice Tenant-Based	AHA does not anticipate any issues for Housing Choice participants in leasing quality rental units in the Atlanta Metropolitan market and will continue to monitor market conditions.	AHA pulled from its Housing Choice waiting lists during FY 2014 and expects to continue this process through FY 2015. If the waiting list is exhausted, AHA may explore opening the Housing Choice waiting list, subject to funding availability.

6. AHA-Owned, Managed, and Sponsored Communities and Properties (as of February 10, 2014)

Definitions:

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

AHA-Owned Residential Communities

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

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

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

⁽¹⁾ Each community is located in Fulton County, except East Lake Highrise which is located in DeKalb County.

6. AHA-Owned, Managed, and Sponsored Communities and Properties (as of February 10, 2014)

AHA Sponsored Mixed-Income, Mixed-Finance Communities

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

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

**6. AHA-Owned, Managed, and Sponsored Communities and Properties
(as of February 10, 2014)**

AHA Sponsored Mixed-Income, Mixed-Finance Communities

#	Community	Former Public Housing Community	Type of Assistance	
			PH	PBRA
25	Columbia Senior Residences at MLK	Capitol Homes		X
26	Columbia Tower at MLK Village	Capitol Homes		X
27	Columbia Village ⁽¹⁾	East Lake	X	
28	Gardens at CollegeTown	Harris Homes	X	
29	Magnolia Park I	John Eagan Homes	X	
30	Magnolia Park II	John Eagan Homes	X	
31	Mechanicsville Crossing	McDaniel Glenn	X	X
32	Mechanicsville Station	McDaniel Glenn	X	X
33	Oasis at Scholars Landing ⁽²⁾	University Homes		X
34	Parkside at Mechanicsville	McDaniel Glenn	X	X
35	Veranda at Auburn Pointe	Grady Homes	X	X
36	Veranda at Auburn Pointe II	Grady Homes		X
37	Veranda at Auburn Pointe III	Grady Homes		X
38	Veranda at Carver	Carver Homes		X
39	Veranda at CollegeTown	Harris Homes		X
40	Veranda at Scholars Landing	University Homes		X
41	Village at Castleberry Hill I	John Hope Homes	X	
42	Village at Castleberry Hill II	John Hope Homes	X	
43	Villages at Carver I	Carver Homes	X	
44	Villages at Carver II	Carver Homes	X	
45	Villages at Carver III	Carver Homes	X	
46	Villages at Carver V	Carver Homes	X	
47	Villages of East Lake I ⁽¹⁾	East Lake	X	
48	Villages of East Lake II ⁽¹⁾	East Lake	X	

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

⁽²⁾ Oasis at Scholars Landing is still under development.

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

6. AHA-Owned, Managed, and Sponsored Communities and Properties (as of February 10, 2014)

PBRA Developments and Supportive Housing

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

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

**6. AHA-Owned, Managed, and Sponsored Communities and Properties
(as of February 10, 2014)**

PBRA Developments and Supportive Housing

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

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

6. AHA-Owned, Managed, and Sponsored Communities and Properties (as of February 10, 2014)

Former Public Housing Communities

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

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

6. AHA-Owned, Managed, and Sponsored Communities and Properties (as of February 10, 2014)

Facilities and Land Owned or Acquired by AHA

Parcel ID	Address	City	State	Zip Code
<i>These properties are all candidates for demolition and/or disposition or will be used to expand AHA's real estate portfolio, provide affordable and/or mixed-income, mixed-use housing opportunities, and support local revitalization initiatives to stabilize local neighborhoods.</i>				
14-0117-0003-055-2	0 Abbott St	Atlanta	GA	30310
14-0117-0002-103-1	305 Abbott St	Atlanta	GA	30310
14-0117-0003-017-2	320 Abbott St	Atlanta	GA	30310
15-180-02-025	0 Alston Dr SE	Atlanta	GA	30317
14-0072-0006-094-1	257 Amal Dr	Atlanta	GA	30315
14-0072-0002-032-5	0 Arthur J. Langford Rd	Atlanta	GA	30315
14-0116-0003-078-5	0 Ashby St	Atlanta	GA	30314
14-0046-0010-140-9	0 Auburn Ave NE	Atlanta	GA	30303
14-0046-0010-141-7	333 Auburn Ave NE	Atlanta	GA	30303
14-0046-0010-197-9	333 Auburn Ave NE	Atlanta	GA	30303
14-0117-0002-037-1	0 Baldwin St SW	Atlanta	GA	30310
14-0117-0002-038-9	0 Baldwin St SW	Atlanta	GA	30310
14-0117-0002-039-7	0 Baldwin St SW	Atlanta	GA	30310
14-0117-0002-102-3	1015 Baldwin St SW	Atlanta	GA	30310
14-0117-0002-040-5	1047 Baldwin St SW	Atlanta	GA	30310
14-0117-0002-095-9	1059 Baldwin St SW	Atlanta	GA	30310
17-0267-LL-075-5	3475 Bankhead Hwy NW	Atlanta	GA	30331
17-0267-LL-083-9	3476 Bankhead Hwy NW	Atlanta	GA	30331
14-0252-LL-064-3	2440 Barge Rd SW	Atlanta	GA	30331
14-0047-0001-093-0	0 Bedford Pl NE	Atlanta	GA	30303
14-0110-0004-034-3	875 Booker Washington Dr	Atlanta	GA	30314
14-0110-0007-007-6	880 Booker Washington Dr	Atlanta	GA	30314
14-0110-0004-036-8	883 Booker Washington Dr	Atlanta	GA	30314
14-0110-0007-006-8	886 Booker Washington Dr	Atlanta	GA	30314
14-0110-0007-004-3	890 Booker Washington Dr	Atlanta	GA	30314
14-0042-0004-080-9	951 Boulevard SE	Atlanta	GA	30312
14-0051-0009-159-4	0 Butler St	Atlanta	GA	30303
14-0051-0009-160-2	0 Butler St	Atlanta	GA	30303
14-0110-0009-017-3	757 Carter St	Atlanta	GA	30314
14-0110-0009-019-9	765 Carter St	Atlanta	GA	30314
14-0110-0009-018-1	767 Carter St	Atlanta	GA	30314
14-0079-0006-003-5	0 Centennial Olympic Park Dr NW	Atlanta	GA	30313
14-0079-0011-059-0	0 Centennial Olympic Park Dr NW	Atlanta	GA	30313
17-0005-LL-085-1	0 Cheshire Bridge Rd	Atlanta	GA	30324
17-0005-LL-086-9	2170 Cheshire Bridge Rd	Atlanta	GA	30324
17-0227-LL-018-4	0 Clarissa Dr NW	Atlanta	GA	30318
14-0041-0002-035-6	0 Climax St SE	Atlanta	GA	30315
14-0041-0002-052-1	373 Climax St SE	Atlanta	GA	30315
14-0041-0002-029-9	374 Climax St SE	Atlanta	GA	30315

6. AHA-Owned, Managed, and Sponsored Communities and Properties (as of February 10, 2014)

Facilities and Land Owned or Acquired by AHA

Parcel ID	Address	City	State	Zip Code
14-0041-0002-051-3	379 Climax St SE	Atlanta	GA	30315
14-0041-0002-030-7	380 Climax St SE	Atlanta	GA	30315
14-0041-0002-050-5	385 Climax St SE	Atlanta	GA	30315
14-0041-0002-031-5	388 Climax St SE	Atlanta	GA	30315
14-0041-0002-049-7	393 Climax St SE	Atlanta	GA	30315
14-0041-0002-032-3	394 Climax St SE	Atlanta	GA	30315
14-0041-0002-033-1	400 Climax St SE	Atlanta	GA	30315
14-0041-0002-034-9	406 Climax St SE	Atlanta	GA	30315
14-0041-0002-048-9	407 Climax St SE	Atlanta	GA	30315
14-0041-0002-047-1	411 Climax St SE	Atlanta	GA	30315
14-0041-0002-036-4	412 Climax St SE	Atlanta	GA	30315
14-0041-0002-046-3	417 Climax St SE	Atlanta	GA	30315
14-0041-0002-037-2	418 Climax St SE	Atlanta	GA	30315
14-0041-0002-038-0	424 Climax St SE	Atlanta	GA	30315
14-0041-0002-045-5	425 Climax St SE	Atlanta	GA	30315
14-0041-0002-039-8	430 Climax St SE	Atlanta	GA	30315
14-0041-0002-044-8	431 Climax St SE	Atlanta	GA	30315
14-0041-0002-040-6	436 Climax St SE	Atlanta	GA	30315
14-0041-0002-043-0	437 Climax St SE	Atlanta	GA	30315
14-0041-0002-041-4	442 Climax St SE	Atlanta	GA	30315
14-0041-0002-042-2	443 Climax St SE	Atlanta	GA	30315
17-0225-LL-052-5	1532 Craftsman Rd NW	Atlanta	GA	30318
14-0085-0013-115-0	330 Crumley St SW	Atlanta	GA	30312
14-0085-0013-088-9	376 Crumley St SW	Atlanta	GA	30312
14-0085-0013-085-5	390 Crumley St SW	Atlanta	GA	30312
14-0085-0013-084-8	394 Crumley St SW	Atlanta	GA	30312
14-0117-0003-061-0	950 Cunningham Pl	Atlanta	GA	30310
14-0081-0001-110-9	0 Curran St NW	Atlanta	GA	30318
14-0081-0004-107-2	0 Curran St NW	Atlanta	GA	30318
14-0041-0002-057-0	0 Dalton St SE	Atlanta	GA	30315
14-0041-0002-053-9	374 Dalton St SE	Atlanta	GA	30315
14-0041-0002-060-4	375 Dalton St SE	Atlanta	GA	30315
14-0041-0002-054-7	380 Dalton St SE	Atlanta	GA	30315
14-0041-0002-059-6	381 Dalton St SE	Atlanta	GA	30315
14-0041-0002-055-4	386 Dalton St SE	Atlanta	GA	30315
14-0041-0002-058-8	387 Dalton St SE	Atlanta	GA	30315
14-0041-0002-056-2	394 Dalton St SE	Atlanta	GA	30315
14-0045-0006-037-4	380 Decatur St SE	Atlanta	GA	30312
14-0075-0008-075-5	0 Doane St	Atlanta	GA	30312
17-0227-LL-003-6	590 Dobbs Circle	Atlanta	GA	30318
17-0227-LL-075-4	0 Drew Pl	Atlanta	GA	30318
15-180-03-023	380 East Lake Blvd SE	Atlanta	GA	30317

6. AHA-Owned, Managed, and Sponsored Communities and Properties (as of February 10, 2014)

Facilities and Land Owned or Acquired by AHA

Parcel ID	Address	City	State	Zip Code
15-180-02-016	421 East Lake Blvd SE	Atlanta	GA	30317
15-180-03-025	457 East Lake Blvd SE	Atlanta	GA	30317
15-180-03-020	460 East Lake Blvd SE	Atlanta	GA	30317
14-0109-0005-076-6	178 Elm St SW	Atlanta	GA	30314
14-0109-0005-075-8	180 Elm St SW	Atlanta	GA	30314
14-0041-LL-011-0	0 Englewood Ave SE	Atlanta	GA	30315
14-0041-LL-013-6	0 Englewood Ave SE	Atlanta	GA	30315
14-0041-LL-010-2	505 Englewood Ave SE	Atlanta	GA	30315
14-0041-LL-012-8	505 Englewood Ave SE	Atlanta	GA	30315
14-0109-0005-083-2	0 Fair St SW	Atlanta	GA	30314
14-0084-0005-041-9	605-607 Fair St SW	Atlanta	GA	30314
14-0084-0005-043-5	615 Fair St SW	Atlanta	GA	30314
14-0109-0005-062-6	653 Fair St SW	Atlanta	GA	30314
14-0109-0005-073-3	655 Fair St SW	Atlanta	GA	30314
14-0109-LL-013-5	668 Fair St SW	Atlanta	GA	30314
14-0055-0004-166-0	0 Fern Ave	Atlanta	GA	30315
14-0081-0004-104-9	0 Fifth St	Atlanta	GA	30305
14-0081-0004-105-6	0 Fifth St	Atlanta	GA	30305
14-0075-0001-078-6	0 Formwalt St SW	Atlanta	GA	30312
14-0075-0001-156-0	629 Formwalt St SW	Atlanta	GA	30312
14-0116-0010-082-8	0 Frank St	Atlanta	GA	30314
14-0116-0010-083-6	0 Frank St	Atlanta	GA	30314
14-0116-0010-084-4	928 Frank St	Atlanta	GA	30314
14-0116-0010-058-8	931 Frank St	Atlanta	GA	30314
14-0116-0010-059-6	937 Frank St	Atlanta	GA	30314
14-0116-0010-081-0	940 Frank St	Atlanta	GA	30314
14-0116-0010-060-4	941 Frank St	Atlanta	GA	30314
14-0116-0010-080-2	944 Frank St	Atlanta	GA	30314
14-0116-0010-061-2	945 Frank St	Atlanta	GA	30314
14-0116-0010-079-4	948 Frank St	Atlanta	GA	30314
14-0116-0010-078-6	952 Frank St	Atlanta	GA	30314
14-0116-0010-077-8	954 Frank St	Atlanta	GA	30314
14-0116-0010-076-0	960 Frank St	Atlanta	GA	30314
14-0116-0010-075-2	964 Frank St	Atlanta	GA	30314
14-0116-0010-074-5	968 Frank St	Atlanta	GA	30314
14-0116-0010-109-9	980 Frank St	Atlanta	GA	30314
14-0085-LL-019-0	0 Fulton St	Atlanta	GA	30312
14-0085-LL-020-8	0 Fulton St	Atlanta	GA	30312
14-0085-LL-021-6	0 Fulton St	Atlanta	GA	30312
14-0045-0002-090-7	0 Gartrell St SE	Atlanta	GA	30312
14-0054-0003-075-5	0 Georgia Ave	Atlanta	GA	30312
14-0054-0002-082-2	142 Georgia Ave	Atlanta	GA	30312

6. AHA-Owned, Managed, and Sponsored Communities and Properties (as of February 10, 2014)

Facilities and Land Owned or Acquired by AHA

Parcel ID	Address	City	State	Zip Code
14-0054-0002-083-0	174 Georgia Ave	Atlanta	GA	30312
14-0085-0013-101-0	0 Glenn St SW	Atlanta	GA	30312
14-0075-0001-159-4	254 Glenn St SW	Atlanta	GA	30312
14-0085-0013-102-8	1186 Glenn St SW	Atlanta	GA	30312
15-180-03-019	0 Glenwood Ave	Atlanta	GA	30317
14-0026-0001-073-7	0 Grange Dr	Atlanta	GA	30315
14-0026-0001-067-9	863 Grange Court	Atlanta	GA	30315
14-0054-0009-089-0	865 Grant Terrace	Atlanta	GA	30315
14-0082-0006-002-2	467 Gray St NW	Atlanta	GA	30318
14-0108-LL-025-0	565 Greensferry Road	Atlanta	GA	30314
14-0108-LL-023-5	600 Greensferry Road	Atlanta	GA	30314
14-0085-0009-083-6	19 Gregg St SW	Atlanta	GA	30312
17-0225-LL-015-2	0 Grove Park PI NW	Atlanta	GA	30318
17-0225-LL-034-6	0 Grove Park PI NW	Atlanta	GA	30318
17-0226-LL-019-3	0 Habershal Dr NW	Atlanta	GA	30318
14-0007-0013-019-9	1150 Henry Thomas Dr	Atlanta	GA	30315
14-0055-0006-065-2	0 Hill St SE	Atlanta	GA	30312
14-0045-LL-480-3	0 Hilliard St SE	Atlanta	GA	30312
14-0045-LL-481-1	0 Hilliard St SE	Atlanta	GA	30312
14-0045-LL-482-9	0 Hilliard St SE	Atlanta	GA	30312
14-0046-0010-204-3	15 Hilliard St SE	Atlanta	GA	30312
14-0045-0001-058-5	20 Hilliard St SE	Atlanta	GA	30312
14-0045-0001-059-3	20 Hilliard St SE	Atlanta	GA	30312
14-0045-LL-474-6	109 Hilliard St SE	Atlanta	GA	30312
14-0045-0001-057-7	110 Hilliard St SE	Atlanta	GA	30312
14-0045-LL-475-3	115 Hilliard St SE	Atlanta	GA	30312
14-0045-0006-036-6	126 Hilliard St SE	Atlanta	GA	30312
17-0251-LL-007-6	1580 Hollywood Rd NW	Atlanta	GA	30318
14-0085-LL-007-5	0 Humphries St	Atlanta	GA	30312
14-0085-LL-013-3	568 Humphries St	Atlanta	GA	30312
14-0079-0006-018-3	0 Hunnicutt St NW	Atlanta	GA	30313
14-0079-0006-019-1	0 Hunnicutt St NW	Atlanta	GA	30313
14-0079-0006-020-9	0 Hunnicutt St NW	Atlanta	GA	30313
14-0079-0006-021-7	0 Hunnicutt St NW	Atlanta	GA	30313
14-0079-0006-022-5	0 Hunnicutt St NW	Atlanta	GA	30313
14-0079-0006-023-3	0 Hunnicutt St NW	Atlanta	GA	30313
14-0085-0013-095-4	0 Ira St SW	Atlanta	GA	30312
14-0085-0013-096-2	0 Ira St SW	Atlanta	GA	30312
14-0085-0013-100-2	0 Ira St SW	Atlanta	GA	30312
14-0085-0013-092-1	579 Ira St SW	Atlanta	GA	30312
14-0085-0013-094-7	587 Ira St SW	Atlanta	GA	30312
14-0085-0013-097-0	595 Ira St SW	Atlanta	GA	30312

6. AHA-Owned, Managed, and Sponsored Communities and Properties (as of February 10, 2014)

Facilities and Land Owned or Acquired by AHA

Parcel ID	Address	City	State	Zip Code
14-0085-0013-098-8	599 Ira St SW	Atlanta	GA	30312
14-0085-0013-099-6	603 Ira St SW	Atlanta	GA	30312
17-0259-LL-163-9	0 James Jackson Pkwy NW	Atlanta	GA	30318
14-0110-0009-021-5	81 James P. Brawley Dr NW	Atlanta	GA	30314
14-0110-0009-022-3	87 James P. Brawley Dr NW	Atlanta	GA	30314
14-0110-0009-023-1	91 James P. Brawley Dr NW	Atlanta	GA	30314
14-0110-0009-025-6	99 James P. Brawley Dr NW	Atlanta	GA	30314
14-0110-0009-024-9	93 - 95 James P. Brawley Dr NW	Atlanta	GA	30314
14-0110-0009-158-5	103-111 James P. Brawley Dr NW	Atlanta	GA	30314
14-0082-0006-008-9	0 John St	Atlanta	GA	30314
14-0082-0006-009-7	0 John St	Atlanta	GA	30314
14-0082-0006-011-3	0 John St	Atlanta	GA	30314
14-0051-0009-151-1	230 John Wesley Dobbs Ave	Atlanta	GA	30303
17-0225-LL-038-4	0 Johnson Rd NW	Atlanta	GA	30318
17-0225-LL-039-2	0 Johnson Rd NW	Atlanta	GA	30318
17-0225-LL-040-0	0 Johnson Rd NW	Atlanta	GA	30318
17-0225-LL-025-1	1125 Johnson Rd NW	Atlanta	GA	30318
14-0027-LL-134-8	2291 Jonesboro Rd	Atlanta	GA	30315
14-0028-LL-061-2	2471 Jonesboro Rd	Atlanta	GA	30315
14-0116-0010-085-1	0 Joseph E. Lowery Blvd SW	Atlanta	GA	30310
14-0117-0003-013-1	0 Joseph E. Lowery Blvd SW	Atlanta	GA	30310
14-0110-0007-015-9	135 Joseph E. Lowery Blvd SW	Atlanta	GA	30310
14-0116-0010-086-9	285 Joseph E. Lowery Blvd SW	Atlanta	GA	30310
14-0116-0010-119-8	295 Joseph E. Lowery Blvd SW	Atlanta	GA	30310
14-0117-0003-054-5	325 Joseph E. Lowery Blvd SW	Atlanta	GA	30310
14-0117-0003-057-8	435 Joseph E. Lowery Blvd SW	Atlanta	GA	30310
14F-0029-LL-039-1	0 Kimberly Rd	Atlanta	GA	30331
14F-0029-LL-040-9	0 Kimberly Rd	Atlanta	GA	30331
14F-0029-LL-038-3	1371 Kimberly Rd	Atlanta	GA	30331
14F-0029-LL-041-7	1371 Kimberly Rd	Atlanta	GA	30331
14F-0029-LL-029-2	1381 Kimberly Rd	Atlanta	GA	30331
15-180-01-006	0 Lakeside Village Dr	Atlanta	GA	30317
14-0117-LL-001-0	406 Lawton St	Atlanta	GA	30310
14-0108-0007-049-2	0 Lee St SW	Atlanta	GA	30310
14-0005-0002-066-5	2413 Leila Lane	Atlanta	GA	30315
14-0047-0004-099-4	0 Linden Ave	Atlanta	GA	30308
14-0006-LL-065-9	2405 Locust Lane SE	Atlanta	GA	30315
17-0190-LL-040-1	0 Lois St NW	Atlanta	GA	30318
14-0117-0006-094-8	0 Lucile Ave	Atlanta	GA	30310
14-0117-0006-103-7	0 Lucile Ave	Atlanta	GA	30310
14-0079-0006-017-5	0 Luckie St NW	Atlanta	GA	30313
14-0079-0001-021-2	523 Luckie St NW	Atlanta	GA	30313

6. AHA-Owned, Managed, and Sponsored Communities and Properties (as of February 10, 2014)

Facilities and Land Owned or Acquired by AHA

Parcel ID	Address	City	State	Zip Code
14-0110-0007-058-9	0 Magnolia St NW	Atlanta	GA	30314
14-0110-0009-003-3	760 Magnolia St	Atlanta	GA	30314
14-0110-0009-002-5	768 Magnolia St	Atlanta	GA	30314
14-0110-0007-056-3	892 Magnolia St	Atlanta	GA	30314
17-0048-LL-035-5	760 Marian Rd	Atlanta	GA	30324
17-0244-0001-029-8	2295 Marietta Rd NW	Atlanta	GA	30318
14-0053-0002-003-9	0 Martin St	Atlanta	GA	30312
14-0053-0002-067-4	0 Martin St	Atlanta	GA	30312
14-0053-0001-101-2	371 Martin St	Atlanta	GA	30312
14-0205-0001-076-3	2610 Martin Luther King Jr Dr SW	Atlanta	GA	30311
14-0085-LL-006-7	0 McDaniel St	Atlanta	GA	30312
14-0085-LL-028-1	0 McDaniel St	Atlanta	GA	30310
14-0085-LL-029-9	0 McDaniel St	Atlanta	GA	30310
14-0108-LL-002-9	365 McDaniel St	Atlanta	GA	30313
14-0086-0002-081-6	749 McDaniel St	Atlanta	GA	30310
14-0008-LL-016-0	0 McDonough Blvd	Atlanta	GA	30315
14-0008-LL-022-8	0 McDonough Blvd	Atlanta	GA	30315
14-0072-LL-043-5	0 Meldon Ave	Atlanta	GA	30315
15-180-02-018	0 Memorial Dr SE	Atlanta	GA	30317
14-0044-0001-109-7	0 Memorial Dr SE	Atlanta	GA	30312
14-0052-0008-040-6	0 Memorial Dr SE	Atlanta	GA	30312
14-0053-0002-066-6	0 Memorial Dr SE	Atlanta	GA	30312
14-0052-0008-034-9	22 Memorial Dr SE	Atlanta	GA	30312
14-0053-0002-001-3	175 Memorial Dr SE	Atlanta	GA	30312
14-0044-0001-016-4	341 Memorial Dr SE	Atlanta	GA	30312
14-0044-0001-108-9	359 Memorial Dr SE	Atlanta	GA	30312
14-0044-0001-101-4	361 Memorial Dr SE	Atlanta	GA	30312
14-0044-0001-099-0	363 Memorial Dr SE	Atlanta	GA	30312
14-0044-0001-022-2	381 Memorial Dr SE	Atlanta	GA	30312
15-180-01-005	2143 Memorial Dr SE	Atlanta	GA	30317
14-0079-0002-024-5	0 Merritts Ave	Atlanta	GA	30313
14-0008-LL-015-2	1773 Moreland Ave	Atlanta	GA	30315
14-0072-LL-044-3	0 Moury Ave SE	Atlanta	GA	30315
14-0072-LL-045-0	0 Moury Ave SE	Atlanta	GA	30315
14-0072-LL-046-8	0 Moury Ave SE	Atlanta	GA	30315
14-0072-LL-047-6	0 Moury Ave SE	Atlanta	GA	30315
14-0072-LL-048-4	0 Moury Ave SE	Atlanta	GA	30315
14-0072-LL-049-2	0 Moury Ave SE	Atlanta	GA	30315
14-0072-LL-050-0	0 Moury Ave SE	Atlanta	GA	30315
14-0072-LL-051-8	0 Moury Ave SE	Atlanta	GA	30315
14-0072-LL-023-7	174 Moury St	Atlanta	GA	30315
14-0072-0006-089-1	0 New South Pryor Rd	Atlanta	GA	30315

6. AHA-Owned, Managed, and Sponsored Communities and Properties (as of February 10, 2014)

Facilities and Land Owned or Acquired by AHA

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

6. AHA-Owned, Managed, and Sponsored Communities and Properties (as of February 10, 2014)

Facilities and Land Owned or Acquired by AHA

Parcel ID	Address	City	State	Zip Code
14-0085-0013-113-5	0 Ray Alley SW	Atlanta	GA	30312
14-0076-0007-118-3	250 Richardson St	Atlanta	GA	30312
17-0190-LL-035-1	0 Rockdale St NW	Atlanta	GA	30318
14-0033-0001-054-8	3698 Ruby H Harper Blvd	Atlanta	GA	30354
14-0073-LL-008-7	1463 S Pryor Rd	Atlanta	GA	30315
14-0072-0002-010-1	1543-1549 S Pryor Rd	Atlanta	GA	30315
14-0072-0002-033-3	1543-1549 S Pryor Rd	Atlanta	GA	30315
14-0117-0003-019-8	0 Sells Ave SW	Atlanta	GA	30310
14-0110-0005-089-6	791 Spencer St NW	Atlanta	GA	30314
14-0110-0005-021-9	797 Spencer St NW	Atlanta	GA	30314
14-0110-0005-022-7	801 Spencer St NW	Atlanta	GA	30314
14-0110-0004-059-0	835 Spencer St NW	Atlanta	GA	30314
14-0110-0004-060-8	843 Spencer St NW	Atlanta	GA	30314
14-0110-0004-048-3	847 Spencer St NW	Atlanta	GA	30314
14-0110-0004-056-6	855 Spencer St NW	Atlanta	GA	30314
14-0110-0004-057-4	859 Spencer St NW	Atlanta	GA	30314
14-0110-0004-015-2	883 Spencer St NW	Atlanta	GA	30314
14-0110-0004-016-0	887 Spencer St NW	Atlanta	GA	30314
14-0110-0004-018-6	895 Spencer St NW	Atlanta	GA	30314
14-0079-0003-075-6	0 Techwood Dr	Atlanta	GA	30313
17-0106-0009-118-8	150 Tenth St NE	Atlanta	GA	30309
14-0026-0005-026-1	0 Thomasville Blvd	Atlanta	GA	30315
14-0026-0005-027-9	0 Thomasville Blvd	Atlanta	GA	30315
14-0026-LL-051-5	0 Thomasville Blvd	Atlanta	GA	30315
14-0110-0005-006-0	804 Thurmond St NW	Atlanta	GA	30314
14-0110-0004-053-3	834 Thurmond St NW	Atlanta	GA	30314
14-0110-0004-054-1	838 Thurmond St NW	Atlanta	GA	30314
14-0110-0004-064-0	842 Thurmond St NW	Atlanta	GA	30314
14-0110-0004-061-6	846 Thurmond St NW	Atlanta	GA	30314
14-0110-0004-062-4	850 Thurmond St NW	Atlanta	GA	30314
14-0007-0005-025-6	0 Velma St	Atlanta	GA	30315
14-0084-0005-090-6	136 Vine St	Atlanta	GA	30314
14-0084-0005-091-4	138 Vine St	Atlanta	GA	30314
14-0084-0005-051-8	140 Vine St	Atlanta	GA	30314
14-0084-0005-050-0	146 Vine St	Atlanta	GA	30314
14-0084-0005-049-2	152 Vine St	Atlanta	GA	30314
14-0084-0005-048-4	158 Vine St	Atlanta	GA	30314
14-0084-0005-095-5	162 Vine St	Atlanta	GA	30314
14-0084-0005-096-3	162 Vine St	Atlanta	GA	30314
14-0084-0005-046-8	168 Vine St	Atlanta	GA	30314
14-0084-0005-044-3	172 Vine St	Atlanta	GA	30314
14-0084-0005-034-4	175 Walnut St	Atlanta	GA	30314

6. AHA-Owned, Managed, and Sponsored Communities and Properties (as of February 10, 2014)

Facilities and Land Owned or Acquired by AHA

Parcel ID	Address	City	State	Zip Code
14-0117-0005-061-8	0 West End Pl SW	Atlanta	GA	30310
14-0116-0010-027-3	0 Westview Dr SW	Atlanta	GA	30310
14-0116-0010-093-5	0 Westview Dr SW	Atlanta	GA	30310
14-0116-0010-096-8	0 Westview Dr SW	Atlanta	GA	30310
14-0116-0010-099-2	0 Westview Dr SW	Atlanta	GA	30310
14-0116-0010-114-9	0 Westview Dr SW	Atlanta	GA	30310
14-0117-0002-003-3	0 Westview Dr SW	Atlanta	GA	30310
14-0117-0002-007-4	0 Westview Dr SW	Atlanta	GA	30310
14-0117-0002-008-2	0 Westview Dr SW	Atlanta	GA	30310
14-0117-0002-014-0	0 Westview Dr SW	Atlanta	GA	30310
14-0117-0003-008-1	0 Westview Dr SW	Atlanta	GA	30310
14-0117-0003-010-7	926 Westview Dr SW	Atlanta	GA	30310
14-0117-0003-009-9	930 Westview Dr SW	Atlanta	GA	30310
14-0116-0010-089-3	931 Westview Dr SW	Atlanta	GA	30310
14-0116-0010-090-1	935 Westview Dr SW	Atlanta	GA	30310
14-0117-0003-007-3	938 Westview Dr SW	Atlanta	GA	30310
14-0116-0010-091-9	939 Westview Dr SW	Atlanta	GA	30310
14-0117-0003-064-4	940 Westview Dr SW	Atlanta	GA	30310
14-0116-0010-092-7	943 Westview Dr SW	Atlanta	GA	30310
14-0117-0003-004-0	944 Westview Dr SW	Atlanta	GA	30310
14-0117-0003-003-2	948 Westview Dr SW	Atlanta	GA	30310
14-0116-0010-094-3	949 Westview Dr SW	Atlanta	GA	30310
14-0117-0003-002-4	952 Westview Dr SW	Atlanta	GA	30310
14-0116-0010-095-0	953 Westview Dr SW	Atlanta	GA	30310
14-0116-0010-108-1	961 Westview Dr SW	Atlanta	GA	30310
14-0116-0010-100-8	975 Westview Dr SW	Atlanta	GA	30310
14-0116-0010-030-7	981 Westview Dr SW	Atlanta	GA	30310
14-0116-0010-029-9	985 Westview Dr SW	Atlanta	GA	30310
14-0116-0010-028-1	993 Westview Dr SW	Atlanta	GA	30310
14-0117-0002-016-5	1006 Westview Dr SW	Atlanta	GA	30310
14-0117-0002-015-7	1012 Westview Dr SW	Atlanta	GA	30310
14-0117-0002-013-2	1018 Westview Dr SW	Atlanta	GA	30310
14-0117-0002-012-4	1020 Westview Dr SW	Atlanta	GA	30310
14-0117-0002-011-6	1022 Westview Dr SW	Atlanta	GA	30310
14-0117-0002-010-8	1026 Westview Dr SW	Atlanta	GA	30310
14-0117-0002-009-0	1030 Westview Dr SW	Atlanta	GA	30310
14-0117-0002-006-6	1040 Westview Dr SW	Atlanta	GA	30310
14-0117-0002-005-8	1044 Westview Dr SW	Atlanta	GA	30310
14-0117-0002-004-1	1048 Westview Dr SW	Atlanta	GA	30310
14-0117-0002-002-5	1056 Westview Dr SW	Atlanta	GA	30310
14-0117-0002-001-7	1060 Westview Dr SW	Atlanta	GA	30310
14-0085-0013-079-8	0 Whitehall Terrace SW	Atlanta	GA	30312

**6. AHA-Owned, Managed, and Sponsored Communities and Properties
(as of February 10, 2014)**

Facilities and Land Owned or Acquired by AHA

Parcel ID	Address	City	State	Zip Code
14-0085-0013-081-4	0 Whitehall Terrace SW	Atlanta	GA	30312
14-0085-0013-082-2	0 Whitehall Terrace SW	Atlanta	GA	30312
14-0085-0013-105-1	0 Whitehall Terrace SW	Atlanta	GA	30312
14-0085-0013-107-7	0 Whitehall Terrace SW	Atlanta	GA	30312
14-0085-0013-110-1	0 Whitehall Terrace SW	Atlanta	GA	30312
14-0085-0013-108-5	584 Whitehall Terrace SW	Atlanta	GA	30312
14-0085-0013-114-3	592 Whitehall Terrace SW	Atlanta	GA	30312
14-0085-0013-119-2	602 Whitehall Terrace SW	Atlanta	GA	30312
14-0045-0001-029-6	0 Wm Holmes Borders Sr Dr	Atlanta	GA	30312
14-0053-0001-105-3	0 Woodward Ave SE	Atlanta	GA	30312
14-0053-0001-106-1	0 Woodward Ave SE	Atlanta	GA	30312
14-0053-0001-103-8	79 Woodward Ave SE	Atlanta	GA	30312

NOTE: For the listing of Land Swaps, refer to the HUD-approved Revitalization Plan and Section II. 2015 Priorities: Priority 1

Appendix E: Management Information for Owned / Managed Units at AHA-Owned Residential Communities and Assisted Units at Mixed-Income Communities (as of June 30, 2013)

1. Occupancy Rate			
The ratio of occupied public housing units to available units as of the last day of the fiscal year shall be greater than or equal to the target benchmark.			
Program / Community Type	AHA MTW Target (at least)	Actual Occupancy Rate (%)	Difference
AHA-Owned Residential Communities			
Barge Road Highrise	98%	98.4%	0.4%
Cheshire Bridge Road Highrise	98%	100.0%	2.0%
Cosby Spear Highrise	98%	100.0%	2.0%
East Lake Highrise	98%	100.0%	2.0%
Georgia Avenue Highrise	98%	100.0%	2.0%
Hightower Manor Highrise	98%	99.2%	1.2%
Juniper and Tenth Highrise	98%	98.7%	0.7%
Marian Road Highrise	98%	99.6%	1.6%
Marietta Road Highrise	98%	99.2%	1.2%
Martin Street Plaza	98%	100.0%	2.0%
Peachtree Road Highrise	98%	99.0%	1.0%
Piedmont Road Highrise	98%	100.0%	2.0%
Westminster	98%	100.0%	2.0%
AHA-Owned Communities Average	98%	99.5%	1.5%
AHA-Sponsored Mixed-Income Communities			
Ashley Auburn Pointe I	98%	98.1%	0.1%
Ashley CollegeTown	98%	100.0%	2.0%
Ashley CollegeTown II	98%	98.6%	0.6%
Ashley Courts at Cascade I	98%	100.0%	2.0%
Ashley Courts at Cascade II	98%	97.6%	-0.4%
Ashley Courts at Cascade III	98%	100.0%	2.0%
Ashley Terrace at West End	98%	100.0%	2.0%
Atrium at CollegeTown	98%	98.7%	0.7%
Capitol Gateway I	98%	94.4%	-3.6%
Capitol Gateway II	98%	95.8%	-2.2%
Centennial Place I	98%	93.2%	-4.8%
Centennial Place II	98%	98.6%	0.6%
Centennial Place III	98%	98.6%	0.6%
Centennial Place IV	98%	98.8%	0.8%
Columbia Commons	98%	100.0%	2.0%
Columbia Creste	98%	98.4%	0.4%
Columbia Estate	98%	96.0%	-2.0%
Columbia Grove	98%	98.2%	0.2%
Columbia Mechanicsville Apartments	98%	100.0%	2.0%
Columbia Park Citi	98%	95.1%	-2.9%
Columbia Senior Residences at Mechanicsville	98%	96.3%	-1.7%

Program / Community Type	AHA MTW Target (at least)	Actual Occupancy Rate (%)	Difference
AHA-Sponsored Mixed-Income Communities, cont.			
Columbia Village	98%	93.3%	-4.7% *
Gardens at CollegeTown	98%	92.3%	-5.7% *
Magnolia Park I	98%	96.6%	-1.4% †
Magnolia Park II	98%	91.8%	-6.2% †
Mechanicsville Crossing	98%	97.1%	-0.9% *
Mechanicsville Station	98%	95.2%	-2.8% *
Parkside at Mechanicsville	98%	97.9%	-0.1% *
Veranda at Auburn Pointe	98%	100.0%	2.0%
Villages at Carver I	98%	93.6%	-4.4% *
Villages at Carver II	98%	97.0%	-1.0% *
Villages at Carver III	98%	92.7%	-5.3% *
Villages at Carver V	98%	93.6%	-4.4% *
Villages at Castleberry Hill I	98%	87.9%	-10.1% *
Villages at Castleberry Hill II	98%	96.5%	-1.5% *
Villages of East Lake I	98%	92.3%	-5.7% *
Villages of East Lake II	98%	92.2%	-5.8% *
AHA-Sponsored Communities Average	98%	96.0%	-2.0% *
Public Housing-Assisted Average	98%	98%	0%

Meets
Benchmark

A. MANAGEMENT NOTES:

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

This was due to a shortfall in benchmark performance in some of the AHA-Sponsored Mixed-Income Communities (starred items above), this shortfall is generally attributable to factors such as: eligibility, turnover, and timing, which are unrelated to the viability of the communities.

The occupancy rate within communities with a low number of assisted units can often skew downward with just one or two vacancies. Vacant unit turnovers often occurred just before the end of FY 2013. Those units were subsequently leased during the first month of the new fiscal year. Also, when multiple units were vacated around the same time, the communities often fell below their occupancy target.

Perhaps more so than in previous years, property management has noticed the economy's effect on the applicants' ability to meet eligibility criteria – in particular many applicants on the waiting list do not meet credit requirements or AHA's Work/Program Requirement, or they lack the money for a security deposit.

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

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

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

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

2. Percent Rents Uncollected			
Gross tenant rents receivable through the last day of the fiscal year divided by the total amount of tenant rents billed during the FY shall be less than or equal to the target benchmark.			
Program / Community Type	AHA MTW Target (at most)	Actual Rents Uncollected (%)	Difference
AHA-Owned Residential Communities			
Barge Road Highrise	2%	0.3%	-1.7%
Cheshire Bridge Road Highrise	2%	0.0%	-2.0%
Cosby Spear Highrise	2%	0.2%	-1.8%
East Lake Highrise	2%	0.0%	-2.0%
Georgia Avenue Highrise	2%	0.0%	-2.0%
Hightower Manor Highrise	2%	0.3%	-1.7%
Juniper and Tenth Highrise	2%	1.1%	-0.9%
Marian Road Highrise	2%	0.0%	-2.0%
Marietta Road Highrise	2%	0.1%	-1.9%
Martin Street Plaza	2%	0.3%	-1.7%
Peachtree Road Highrise	2%	0.0%	-2.0%
Piedmont Road Highrise	2%	0.0%	-2.0%
Westminster	2%	1.0%	-1.0%
AHA-Owned Communities Average	2%	0.2%	-1.8%
AHA-Sponsored Mixed-Income Communities			
Ashley Auburn Pointe I	2%	0.0%	-2.0%
Ashley CollegeTown	2%	1.2%	-0.8%
Ashley CollegeTown II	2%	0.8%	-1.2%
Ashley Courts at Cascade I	2%	1.9%	-0.1%
Ashley Courts at Cascade II	2%	2.2%	0.2%
Ashley Courts at Cascade III	2%	0.6%	-1.4%
Ashley Terrace at West End	2%	0.7%	-1.3%
Atrium at CollegeTown	2%	0.0%	-2.0%
Capitol Gateway I	2%	1.0%	-1.0%
Capitol Gateway II	2%	0.0%	-2.0%
Centennial Place I	2%	2.3%	0.3%
Centennial Place II	2%	0.9%	-1.1%
Centennial Place III	2%	0.2%	-1.8%
Centennial Place IV	2%	0.2%	-1.8%
Columbia Commons	2%	1.0%	-1.0%
Columbia Creste	2%	1.2%	-0.8%
Columbia Estate	2%	1.8%	-0.2%
Columbia Grove	2%	0.4%	-1.6%
Columbia Mechanicsville Apartments	2%	0.2%	-1.8%
Columbia Park Citi	2%	6.4%	4.4%
Columbia Senior Residences at Mechanicsville	2%	0.5%	-1.5%

Program / Community Type	AHA MTW Target (at most)	Actual Rents Uncollected (%)	Difference
AHA-Sponsored Mixed-Income Communities, cont.			
Columbia Village	2%	0.8%	-1.2%
Gardens at CollegeTown	2%	0.0%	-2.0%
Magnolia Park I	2%	5.1%	3.1%
Magnolia Park II	2%	0.0%	-2.0%
Mechanicsville Crossing	2%	0.0%	-2.0%
Mechanicsville Station	2%	0.0%	-2.0%
Parkside at Mechanicsville	2%	0.3%	-1.7%
Veranda at Auburn Pointe	2%	1.0%	-1.0%
Villages at Carver I	2%	4.0%	2.0%
Villages at Carver II	2%	3.0%	1.0%
Villages at Carver III	2%	1.3%	-0.7%
Villages at Carver V	2%	0.3%	-1.7%
Villages at Castleberry Hill I	2%	3.2%	1.2%
Villages at Castleberry Hill II	2%	0.1%	-1.9%
Villages of East Lake I	2%	0.2%	-1.8%
Villages of East Lake II	2%	0.0%	-2.0%
AHA-Sponsored Communities Average	2%	0.9%	-1.1%
Public Housing-Assisted Totals	2%	0.5%	-1.5%

Exceeds
Benchmark

A. MANAGEMENT NOTES:

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

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

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

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

Program / Community Type	AHA MTW Target (at least)	Actual Emergency Work Orders Completed / Abated in <24 hrs (%)	Difference
AHA-Sponsored Mixed-Income Communities, cont.			
Columbia Village	99%	100%	1.0%
Gardens at CollegeTown	99%	100%	1.0%
Magnolia Park I	99%	100%	1.0%
Magnolia Park II	99%	100%	1.0%
Mechanicsville Crossing	99%	100%	1.0%
Mechanicsville Station	99%	100%	1.0%
Parkside at Mechanicsville	99%	100%	1.0%
Veranda at Auburn Pointe	99%	100%	1.0%
Villages at Carver I	99%	100%	1.0%
Villages at Carver II	99%	100%	1.0%
Villages at Carver III	99%	100%	1.0%
Villages at Carver V	99%	100%	1.0%
Villages at Castleberry Hill I	99%	98%	-1.1%
Villages at Castleberry Hill II	99%	98%	-1.0%
Villages of East Lake I	99%	100%	1.0%
Villages of East Lake II	99%	71%	-28.2%
AHA-Sponsored Communities Average	99%	99.7%	0.7%
Public Housing-Assisted Totals	99%	99.8%	0.8%

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Exceeds
Benchmark

A. MANAGEMENT NOTES:

AHA exceeded this benchmark by completing or abating approximately 99.8% of emergency work orders within 24 hours.

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

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

4. Routine Work Orders Completed in < 7 Days			
The average number of days that all non-emergency work orders will be active during the fiscal year shall be 7 days or less.			
Program / Community Type	AHA MTW Target (at most)	Actual Average Days to Complete Routine Work Orders (# days)	Difference
AHA-Owned Residential Communities			
Barge Road Highrise	7	3	-4.1
Cheshire Bridge Road Highrise	7	1	-6.0
Cosby Spear Highrise	7	1	-5.8
East Lake Highrise	7	1	-6.0
Georgia Avenue Highrise	7	2	-5.3
Hightower Manor Highrise	7	1	-5.9
Juniper and Tenth Highrise	7	2	-4.8
Marian Road Highrise	7	4	-2.7
Marietta Road Highrise	7	4	-2.9
Martin Street Plaza	7	2	-5.4
Peachtree Road Highrise	7	1	-5.8
Piedmont Road Highrise	7	1	-5.9
Westminster	7	3	-4.0
AHA-Owned Communities Average	7	1.9	-5.1
AHA-Sponsored Mixed-Income Communities			
Ashley Auburn Pointe I	7	2	-5.1
Ashley CollegeTown	7	2	-5.0
Ashley CollegeTown II	7	2	-5.0
Ashley Courts at Cascade I	7	2	-5.2
Ashley Courts at Cascade II	7	2	-5.2
Ashley Courts at Cascade III	7	2	-5.1
Ashley Terrace at West End	7	1	-5.9
Atrium at CollegeTown	7	1	-6.0
Capitol Gateway I	7	3	-3.6
Capitol Gateway II	7	2	-5.0
Centennial Place I	7	2	-5.5
Centennial Place II	7	1	-5.8
Centennial Place III	7	2	-5.2
Centennial Place IV	7	2	-5.3
Columbia Commons	7	4	-3.1
Columbia Creste	7	1	-5.7
Columbia Estate	7	2	-4.5
Columbia Grove	7	3	-4.3
Columbia Mechanicsville Apartments	7	2	-5.1
Columbia Park Citi	7	6	-0.8
Columbia Senior Residences at Mechanicsville	7	3	-4.3

Program / Community Type	AHA MTW Target (at most)	Actual Average Days to Complete Routine Work Orders (# days)	Difference
AHA-Sponsored Mixed-Income Communities, cont.			
Columbia Village	7	1	-6.0
Gardens at CollegeTown	7	1	-5.9
Magnolia Park I	7	3	-3.7
Magnolia Park II	7	2	-4.6
Mechanicsville Crossing	7	2	-5.0
Mechanicsville Station	7	3	-4.2
Parkside at Mechanicsville	7	3	-4.3
Veranda at Auburn Pointe	7	1	-5.8
Villages at Carver I	7	3	-4.2
Villages at Carver II	7	3	-4.4
Villages at Carver III	7	2	-4.7
Villages at Carver V	7	3	-4.2
Villages at Castleberry Hill I	7	2	-5.3
Villages at Castleberry Hill II	7	2	-4.8
Villages of East Lake I	7	3	-3.6
Villages of East Lake II	7	3	-3.8
AHA-Sponsored Communities Average	7	2.3	-4.7
Public Housing-Assisted Totals	7	2.1	-4.9

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Exceeds
Benchmark

A. MANAGEMENT NOTES:

AHA exceeded this benchmark by fulfilling routine work orders on average within 2.1 days, which is far less time than the 7-day target.

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

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

5. Percent Planned Inspections Completed

The percentage of all occupied units and common areas that are inspected during the fiscal year shall be greater than or equal to the target benchmark.

Program / Community Type	AHA MTW Target (at least)	Actual Inspections Completed (%)	Difference
AHA-Owned Residential Communities			
Barge Road Highrise	100%	100.0%	0%
Cheshire Bridge Road Highrise	100%	100.0%	0%
Cosby Spear Highrise	100%	100.0%	0%
East Lake Highrise	100%	100.0%	0%
Georgia Avenue Highrise	100%	100.0%	0%
Hightower Manor Highrise	100%	100.0%	0%
Juniper and Tenth Highrise	100%	100.0%	0%
Marian Road Highrise	100%	100.0%	0%
Marietta Road Highrise	100%	100.0%	0%
Martin Street Plaza	100%	100.0%	0%
Peachtree Road Highrise	100%	100.0%	0%
Piedmont Road Highrise	100%	100.0%	0%
Westminster	100%	100.0%	0%
AHA-Owned Communities Average	100%	100%	0%
AHA-Sponsored Mixed-Income Communities			
Ashley Auburn Pointe I	100%	100%	0%
Ashley CollegeTown	100%	100%	0%
Ashley CollegeTown II	100%	100%	0%
Ashley Courts at Cascade I	100%	100%	0%
Ashley Courts at Cascade II	100%	100%	0%
Ashley Courts at Cascade III	100%	100%	0%
Ashley Terrace at West End	100%	100%	0%
Atrium at CollegeTown	100%	100%	0%
Capitol Gateway I	100%	100%	0%
Capitol Gateway II	100%	100%	0%
Centennial Place I	100%	100%	0%
Centennial Place II	100%	100%	0%
Centennial Place III	100%	100%	0%
Centennial Place IV	100%	100%	0%
Columbia Commons	100%	100%	0%
Columbia Creste	100%	100%	0%
Columbia Estate	100%	100%	0%
Columbia Grove	100%	100%	0%
Columbia Mechanicsville Apartments	100%	100%	0%
Columbia Park Citi	100%	100%	0%
Columbia Senior Residences at Mechanicsville	100%	100%	0%

Program / Community Type	AHA MTW Target (at least)	Actual Inspections Completed (%)	Difference
AHA-Sponsored Mixed-Income Communities, cont.			
Columbia Village	100%	100%	0%
Gardens at CollegeTown	100%	100%	0%
Magnolia Park I	100%	77%	-23%
Magnolia Park II	100%	73%	-27%
Mechanicsville Crossing	100%	100%	0%
Mechanicsville Station	100%	100%	0%
Parkside at Mechanicsville	100%	100%	0%
Veranda at Auburn Pointe	100%	100%	0%
Villages at Carver I	100%	100%	0%
Villages at Carver II	100%	100%	0%
Villages at Carver III	100%	100%	0%
Villages at Carver V	100%	78%	-22%
Villages at Castleberry Hill I	100%	100%	0%
Villages at Castleberry Hill II	100%	100%	0%
Villages of East Lake I	100%	100%	0%
Villages of East Lake II	100%	100%	0%
AHA-Sponsored Communities Average	100%	100.0%	0.0%
Public Housing-Assisted Totals	100%	100.0%	0.0%

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Meets
Benchmark

A. MANAGEMENT NOTES:

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

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

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

Inspections Strategy

AHA Reviews of AHA-Sponsored Mixed-Income Communities

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

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

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

AHA Reviews of AHA-Owned Residential Communities

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

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

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

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

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

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

(5) **Finance/Accounting:** This annual internal financial audit is beneficial in identifying areas of concern within the properties' fiscal operations.

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

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

(8) **Resident Services:** In FY 2012, AHA began a review of the operation of resident services programs at the properties. This review focuses on documentation related to resident activities sponsored by the property such as schedules, sign-in sheets, and feedback surveys. Also, the audit includes a review of service provider referrals and follow-up in regards to meeting resident needs.

6. Security

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

- (1) Dedicating over \$1.8 million during FY 2013 at the AHA-Owned Residential Communities to:
 - a) maintain the security presence of concierges/security staff on the properties, and
 - b) provide video surveillance and a community security channel,
- (2) Utilizing visitor management systems at the high-rise AHA-Owned Residential Communities to further monitor access to the buildings,
- (3) Collaborating with the Atlanta Police Department to identify strategies to deter crime and enhance safety and security at AHA-Owned Residential Communities and AHA-Sponsored Mixed-Income Communities,
- (4) Continuing utilization of enhanced criminal screening standards and processes and strict lease enforcement, and
- (5) Completing the necessary preventive maintenance and repairs to ensure security equipment remains operational on a routine basis.



Atlanta Housing Authority

Atlanta Housing Authority

Comprehensive Budget

For the Fiscal Year

Beginning July 1, 2013 and Ending June 30, 2014

**Preparing AHA for the New Normal —
*Completing the Business Transformation Initiative***

Approved by AHA's Board of Commissioners on June 26, 2013

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Sources and Uses of Funds (Consolidated)

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- I ERP Solution
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MISSION STATEMENT

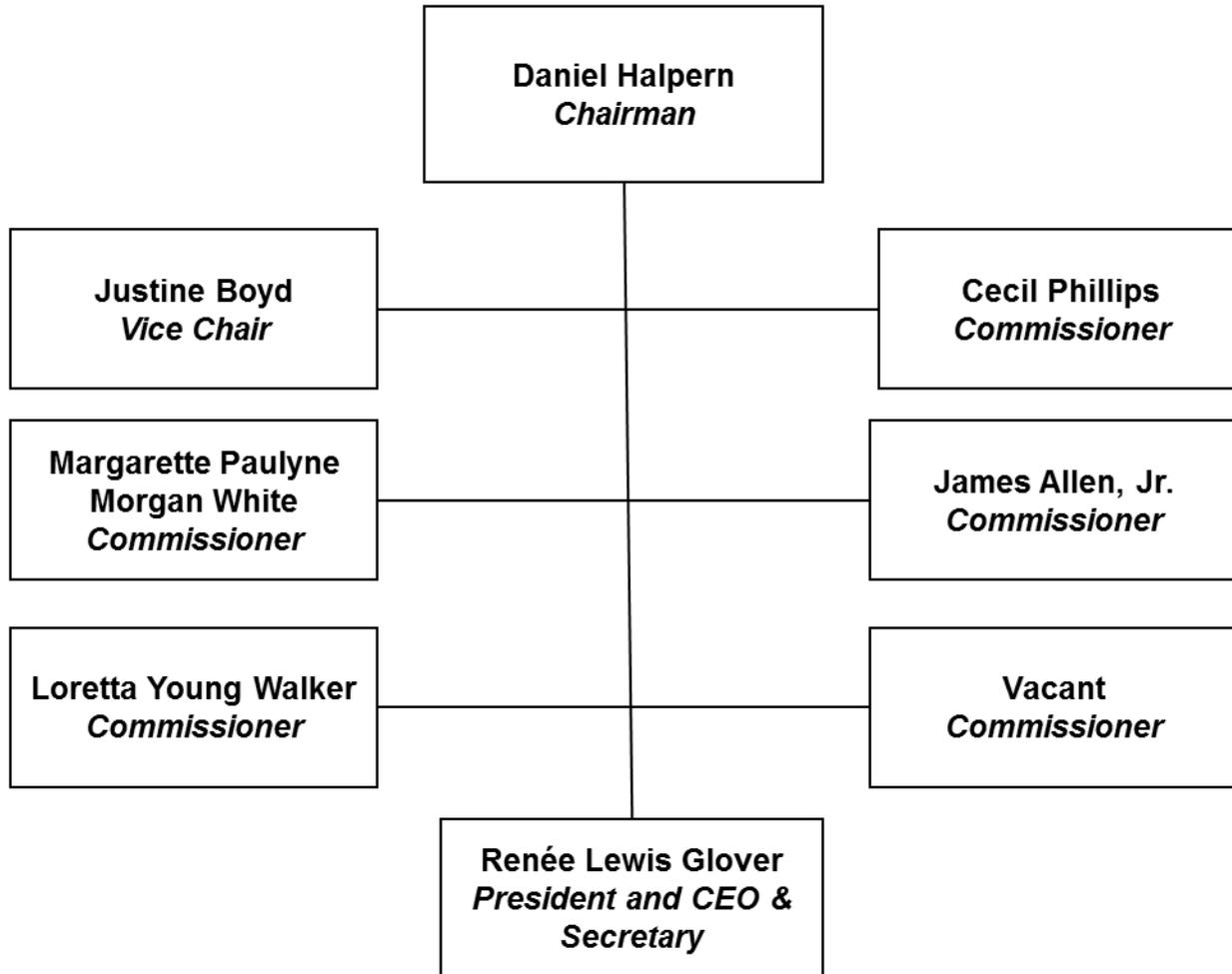
Provide quality affordable housing in amenity-rich, mixed-income communities for the betterment of the community



VISION STATEMENT

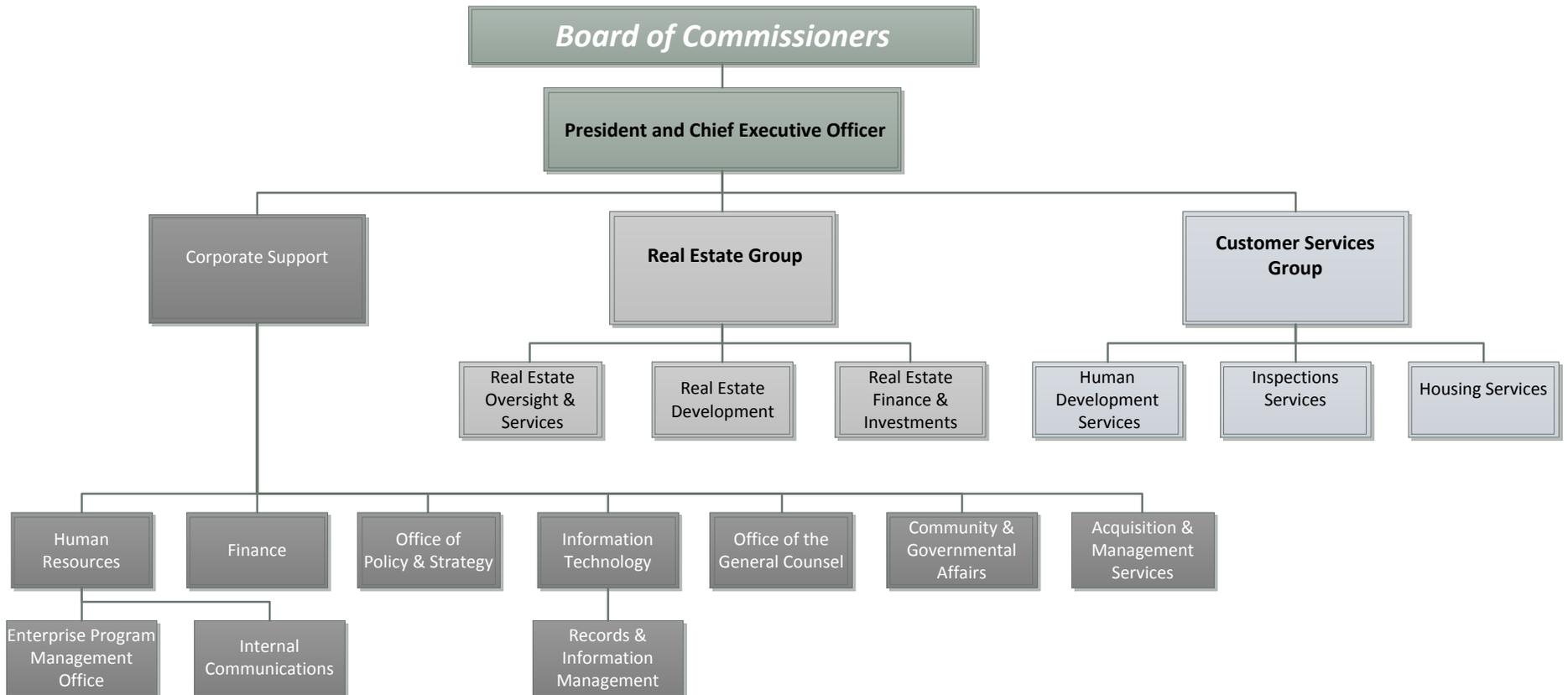
Healthy Mixed-Income Communities; Healthy Self-Sufficient Families

Board of Commissioners



As of May 31, 2013

AHA's Organization



BUDGET OVERVIEW

AHA's FY 2014 Moving to Work (MTW) Implementation Plan

The Atlanta Housing Authority's (AHA) FY 2014 Budget (the "FY 2014 Budget") has been developed in conjunction with and as a part of our FY 2014 MTW Implementation Plan (the "FY 2014 MTW Plan").

The FY 2014 MTW Plan was approved by AHA's Board of Commissioners in March 2013 and was submitted to the U.S. Department of Housing and Urban Development (HUD) in April 2013. The FY 2014 Budget must be approved by the Board and submitted to HUD by June 30, 2013.

The New Normal

AHA recognizes that as the economy and the real estate market recover and in light of large Federal budget deficits, we have entered the age of the "New Normal." What is the New Normal? It is an era of (a) fewer federal resources; (b) more public/private partnerships; (c) new sources of funding; (d) taking on greater market risks, in appropriate circumstances; and (e) greater complexity. The New Normal will require fewer employees with higher skills and deeper core competencies.

Guiding Principles Behind the FY 2014 Budget

As the Senior Leadership of AHA approached the preparation of our FY 2014 Budget, we agreed as an enterprise on the following guiding principles:

1) **AHA's highest priority is serving families in healthy, amenity-rich** (having, at a minimum, access to public

transportation, good schools and quality-of-life amenities) **and economically integrated communities.**

- 2) **AHA's second priority is to serve approximately 21,267 households (based on the number of households served by AHA at the end of FY 2011, per agreement with HUD).**
- 3) **Commencing in FY 2014, a project management approach will be required to be utilized for the implementation of all major projects reporting into the Enterprise Program Management Office (PMO). AHA's PMO was established in FY 2012 to manage all major and complex enterprise-wide projects.** In addition, timely updates must be provided to the PMO regarding progress and outcomes or agreed changes with respect to the goals and objectives in our Board-approved FY 2014 MTW Plan and FY 2014 Budget.
- 4) **During FY 2014, AHA will substantially complete our Business Transformation Initiative, including the implementation of the integrated Enterprise Resource Planning Solution (ERP).** To complete these initiatives, AHA will have to continue to make a number of one-time expenditures. Consistent with this reality and in accordance with AHA's Cash Management Strategy, AHA will spend down a portion of its cash balances during FY 2014, based on detailed project plans, goals and objectives that support AHA's FY 2014 MTW Plan priorities while protecting AHA's financial interest and position.
- 5) **Each project and activity (enterprise and departmental) must support one of AHA's three FY 2014 priorities.** If not, a business case must be made to establish why financial and people resources, as well as time are being expended on

such projects. The three priorities are addressed in the following section of this narrative.

- 6) **Each Department Head must evaluate the number of AHA FTEs, consultants and/or staff augmentation resources, total overhead costs and service levels against the projects that must be delivered during FY 2014.** A blend of employees (within and from other departments), consultants (for specialized expertise) and temporary employees (who should be brought on to help with temporary surges in activity, especially those related to the Business Transformation and Enterprise Resource Planning Solution implementations) should be considered. As the various Business Transformation and Enterprise Resource Planning Solution projects are implemented, we must move toward recognizing the promised efficiencies resulting from Business Transformation and ERP which we have committed to the Board of Commissioners.
- 7) **Each Department Head must commit to AHA’s Cash Management Strategy as part of the development of goals and objectives to be achieved and projects to be delivered during FY 2014.**
- 8) **Given the reality of Federal budget deficits and the sequester, Senior Leadership is committed to identify new sources of funding and revenue opportunities during FY 2014.** If the Executive Team believes that an idea has merit, Policy and Strategy will initiate a team to develop the business case so that such new opportunities can be pursued in a business-oriented manner.

AHA’s FY 2014 Priorities

The FY 2014 Budget encompasses sources and uses of funds that support the following three priorities established in the FY 2014 MTW Plan:

- 1. **Advance the Business Transformation Initiative, including the integrated ERP Solution with the goals of greater effectiveness and efficiency, enhanced capabilities, and an improved customer experience.**

As part of a strategy to strengthen AHA’s business model as a diversified real estate company with a public mission and purpose, AHA initiated a multi-year effort in FY 2011 to align its organizational structure, systems, business processes and operations, strengthen its personnel with the needed expertise and core competencies, and evolve its reporting capability consistent with its transformed delivery systems, public/private partnerships and other business relationships. AHA’s goal is to streamline and automate core operations, as appropriate, thereby enhancing AHA’s opportunities for assisting low-income families.

While AHA’s business constantly evolves in response to family and market needs, during FY 2014, AHA will substantially complete the Business Transformation Initiative, including the implementation of the ERP Solution. Business process improvements in concert with the ERP Solution will significantly increase each employee’s and AHA’s overall business productivity resulting in a monetary return on investment for the enterprise. This investment will support a reduction in staff while facilitating greater productivity of AHA’s employees, resulting in AHA providing better customer service to AHA-assisted families,

as well as to AHA's partners, stakeholders and the community at-large.

FY 2014 activities that support this priority include:

- a. Completion of AHA's Business Transformation Initiative.
- b. Completion of the ERP Solution.
- c. Initiation of a long-term strategic planning process.

2. Advance AHA's Real Estate Initiatives with the goal of facilitating opportunity-rich housing in healthy mixed-income communities.

In FY 2014, AHA, using public/private partnerships, will continue to expand housing opportunities through its various real estate initiatives, and leverage its resources and MTW flexibility to meet its commitment to HUD to serve at least 21,267 households.

AHA and its private-sector development partners will continue to advance the 16 master-planned, mixed-use, mixed-income communities.

Through newly procured private management companies/developers, AHA intends to commence planning to reposition its 11 senior highrises and two family properties to market-quality standards.

AHA will also continue to use its Project Based Rental Assistance (PBRA) program for incenting private-sector developers and owners to reserve an agreed percentage of units for low-income families in existing amenity-rich, market-quality, mixed-income communities, as well as to reserve units in quality supportive housing environments

with wraparound services for homeless persons and other special needs populations.

AHA will also use its Housing Choice tenant-based voucher program to facilitate housing opportunities in economically integrated neighborhoods and to help provide supportive housing opportunities, with wraparound services, for homeless veterans, youth aging out of foster care and other homeless persons. During FY 2014, AHA intends to open its Housing Choice tenant-based waiting list for the first time in more than 11 years.

FY 2014 activities that support this priority include:

- a. Advancement of the master plans for 8 mixed-use, mixed-income communities.
- b. Advancement of other real estate development initiatives.
- c. Expansion of housing opportunities utilizing PBRA and Housing Choice tenant-based programs.
- d. Implementation of the reformulation demonstration program for the AHA-assisted units in the mixed-income, mixed-finance rental phases at Centennial Place, as discussed on page 8.
- e. Support the refinancing of first mortgage debt at various rental phases of AHA-Sponsored mixed-use, mixed-income communities.
- f. Commence planning to reposition AHA-Owned Residential Communities in partnership with new property management companies/real estate development firms to market-quality standards.

During FY 2014, AHA will convert the 301 Section 9 ACC/tax credit units comprising a part of the four rental phases of Centennial Place from Section 9 to Section 8 operating subsidy, using AHA’s form of PBRA Agreement, with the goal of facilitating a debt and equity raise by the managing general partner of the owner of each phase to update and refresh each rental phase to market-competitive standards. The managing general partner of Phase I and II, with AHA’s support as Sponsor, is applying for 9% low-income housing tax credits and arranging private debt for these purposes. During FY 2013, HUD approved the reformulation demonstration proposal for Centennial Place and awarded 160 Housing Choice vouchers to support the demonstration.

3. Advance AHA’s Human Development Initiatives, with the goal of building healthy self-sufficient families through lifelong learning, workforce participation, wealth-building and aging-well initiatives.

Since 1995, as AHA has advanced its Revitalization Program, AHA has successfully relocated more than 18,000 households from obsolete, distressed and socially dysfunctional public housing developments, primarily using Housing Choice vouchers. Based on lessons learned and best practices working with its private-sector business partners, AHA found that, in order to realize successful outcomes for families, quality economically integrated living environments and Human Development services are necessary and essential.

Even though families are making progress, AHA understands that to be successful in mainstream America, long-term, outcome-based Human Development services for

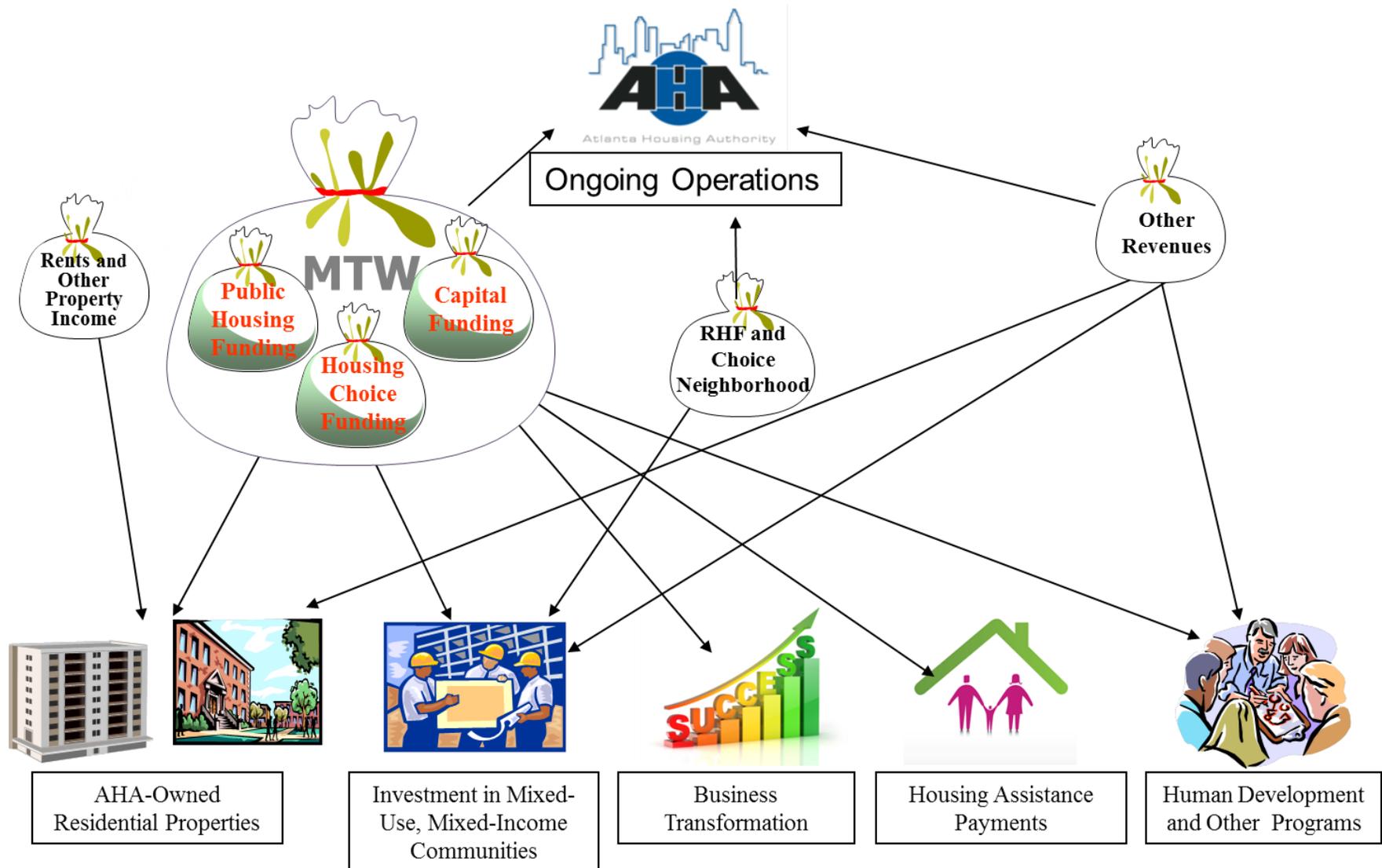
the entire family must be sustained until the desired outcomes are achieved. The goal for AHA’s Human Development strategy is “Healthy, self-reliant individuals and families who are valued contributors in the Atlanta community.”

During FY 2014, AHA, in partnership with its real estate and other business partners, will further advance its comprehensive Human Development initiatives to facilitate opportunities and to support the distinct needs of three populations:

- a. **Working-age Adults:** Implement workforce development strategies and increased literacy to facilitate family self-sufficiency.
- b. **Children and Youth:** Advance pre-K early childhood development strategy, K–12 education partnerships and other youth programs.
- c. **Elderly and Disabled Persons:** Expand activities that advance aging-well and independent living strategies. Explore and advance affordable assisted-living opportunities.

Please refer to the FY 2014 MTW Plan for additional information. The sources of funds to support these priorities (sources) and associated expenditures (uses) are provided in the “Sources of Funds” and “Uses of Funds” sections of this narrative.

Sources and Uses of Funds



GENERAL BUDGET ASSUMPTIONS

The FY 2014 Budget (the “FY 2014 Budget” or “Budget”) is presented in a “Sources of Funds” and “Uses of Funds” format. Depreciation and amortization (non-cash expenses) are not included in this presentation.

SOURCES OF FUNDS ASSUMPTIONS

Moving to Work (MTW) Single Fund

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

Fiscal Years, the Congressional Appropriations Process and HUD Funding

HUD’s HCVP, Operating Subsidy and CFP are funded through the annual federal appropriations process. On March 26, 2013, the President signed the Consolidated and Further Continuing Appropriations Act 2013, Public Law 113-6 (2013 Appropriations Act) which includes the funds that HUD is providing to public housing authorities for calendar year 2013 which is HUD’s Funding Year (HFY) 2013.

AHA’s fiscal year begins on July 1 and ends on June 30. The AHA FY 2014 Budget, therefore, includes six months (July–December 2013) that will be funded based on HFY 2013. Although the 2013 Appropriations Act provides funding to HUD, HUD has not yet provided the HFY 2013 funding levels for AHA’s HCVP, Operating Subsidy and CFP award.

The last six months of AHA’s FY 2014 Budget will be funded based on HFY 2014 funding. Because the Congressional Federal Fiscal Year (FFY) 2014 appropriations process has just begun, AHA cannot be sure of the outcome of the appropriations process and its impact on AHA’s FY 2014 funding levels, especially in light of the Federal deficit, sequestration and competing national priorities.

Calendar Year 2013												Calendar Year 2014											
Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Oct 2012 <- Federal Fiscal Year (FFY) 2013									Federal Fiscal Year (FFY)2014									FFY 2015 ->					
HUD Funding Year (HFY) 2013												HUD Funding Year (HFY) 2014											
<- AHA Fiscal Year (FY) 2013						AHA Fiscal Year (FY) 2014						AHA Fiscal Year (FY) 2015 ->											

HUD Proration Factors, Treatment of Reserves and Allocation Adjustments

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

The 2013 Appropriations Act was based on Congressional appropriation bills that did not intend to fund HUD programs at 100% proration. Funding levels were further reduced by the impact of sequestration. This resulted in estimated prorations of 82% for Public Housing Operating Subsidy and 93% for Housing Choice Voucher Program funding. Capital Fund awards are expected to be reduced by 25%.

HUD has limited ability to modify these Congressionally imposed prorations and, therefore, although HUD has not officially provided the funding levels for HFY 2013, AHA is basing the FY 2014 Budget on the proration levels identified above.

On April 10, 2013, President Obama presented his Administration's proposed FFY 2014 Budget to Congress. If passed as submitted, this Budget would result in an 82% proration for Public Housing Operating Subsidy. Capital Fund awards would be funded at approximately 9% higher than the final FFY 2013 funding levels. The Administration's Proposed FFY 2014 Budget provides an 11% increase in funding for

HCVP over the funding amount contained in the 2013 Appropriations Act, but does not take into account the effect of sequestration and does not establish a proration rate. Instead, the Administration's Proposed FFY 2014 Budget authorizes HUD to make up any shortfall in HCVP by the "recapture" of a PHA's Housing Choice reserves that exceed a level to be established by the Secretary of HUD.

MTW agencies are also subject to this recapture, which in the case of AHA would impact AHA's MTW Single Fund reserves. To mitigate this possible recapture risk and other financial exposure in an ever-changing regulatory environment, AHA implemented its Cash Management Strategy during FY 2013.

A major regulatory and administrative change made by HUD in FY 2013 is how it disburses the tenant-based Housing Choice Voucher Funds to PHAs. HUD now disburses such funds based on a PHA's historical tenant-based voucher housing assistance payment spend rate and projected need, rather than in 12 equal installments of such agency's full annual authorization.

As a Moving to Work (MTW) agency, HUD also allows AHA (and other MTW agencies) to include in the spend rate and needs analysis expenditures of the MTW Single Fund for MTW-eligible activities under its HUD-approved MTW Annual Implementation Plans. AHA (like other PHAs) may request additional disbursements up to its annual authorization but must expend all funds drawn or face future disbursement reductions.

It is uncertain at this time what level of authorized Housing Choice reserves HUD will establish for purposes of any such recapture should the Administration's Proposed FFY 2014 Budget be approved. AHA has already identified uses for its reserves in the FY 2014 MTW Plan and the majority of such

reserves should be under contract with third parties in order to obligate these funds. Projecting the level of funding for the last half of AHA’s FY 2014 Budget is further complicated since both houses of Congress have expressed dissatisfaction with the Administration’s Proposed FFY 2014 Budget and have indicated that each house will introduce its own version of an appropriations bill for FFY 2014 based on their own budget proposals. Finally, it is uncertain how the continued impact of sequestration will impact 2014 funding levels.

Because of the uncertainty of HUD funding during the last half of AHA’s FY 2014 Budget, AHA has made the following proration assumptions based on best available information, which is described further for each funding source.

HUD Program	HFY 2013 (First 6 months of AHA FY 2014) “Proration” Estimate	HFY 2014 (Last 6 months of AHA FY 2014) “Proration” Estimate
Housing Choice Voucher Program	93%	93%
Public Housing Operating Subsidy	82%	82%

Housing Choice Voucher Program (HCVP) Funding (Schedule A)

AHA’s FY 2014 Budget includes \$185.1 million in HCVP funds. This is composed of \$174.6 million in funding for MTW qualified vouchers (MTW HCVP) and approximately \$10.5 million for non-MTW special purpose vouchers.

- Based on HUD’s projected proration of 93%, AHA estimates that HUD will provide AHA with \$87.1 million in MTW HCVP funding based on 18,710 MTW vouchers for the period of July 1 through December 31, 2013.
- Based on an estimated proration of 93%, AHA projects it will receive \$87.5 million from HUD in MTW HCVP funding for the period of January 1 through June 30, 2014 based on 18,870 MTW vouchers.

HUD provides AHA with additional vouchers when property owners involved in other HUD subsidy programs in AHA’s jurisdiction opt out of those programs and HUD authorizes special-purpose tenant assistance vouchers for the benefit of the affected residents. Such vouchers are administered by AHA and are not considered MTW vouchers for the first 12 months. AHA routinely elects to add these vouchers to the MTW voucher count upon the first anniversary of the voucher award.

HUD issued AHA 160 special-purpose vouchers for the reformulation of Centennial Place effective April 2013. Therefore, AHA projects that it will receive approximately \$1.3 million in FY 2014 for these vouchers before their inclusion in MTW funding effective May 2014.

While AHA receives most of its HCVP funds as part of its MTW Single Fund, it receives separate funds for 550 special-

purpose non-MTW vouchers. These special-purpose, non-MTW vouchers are Mainstream, Family Unification Program and Veterans Affairs Supportive Housing (VASH) vouchers. Such vouchers, by virtue of the related appropriations language, will never be eligible to be included in AHA’s MTW Single Fund and are calculated using HUD’s standard formulas. During FY 2014, HUD will provide approximately \$8.8 million in HCVP funds for these non-MTW vouchers, including funds for 110 new VASH vouchers expected to be issued to AHA in early FY 2014. Participants using these vouchers are managed in AHA’s MTW program, but special accommodations apply in accordance with HUD guidance for these special vouchers.

PHAs earn administrative fees from HUD for each non-MTW voucher under contract. AHA estimates that it will earn \$0.4 million in administrative fees during FY 2014 for special purpose vouchers. Funding for the administration of MTW vouchers is included in the calculation of HUD’s MTW Housing Choice funding.

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

Public Housing Operating Subsidy (Operating Subsidy) (Schedule A)

During FY 2014, AHA projects that HUD will provide \$13.7 million in Operating Subsidy based on the following assumptions:

- AHA projects HUD will provide approximately \$6.9 million for the period of July 1 through December 31, 2013.
- AHA projects HUD will provide approximately \$6.8 million for the period of January 1 through June 30, 2014 based on an estimated 82% proration addressed previously.

Capital Fund Program (CFP) Funding (Schedule A)

HUD establishes CFP budgets at the time of annual grant awards based on characteristics of public-housing-assisted units subsidized by AHA under its Annual Contributions Contract with HUD, as amended. While CFP funds are part of the MTW Single Fund, they are provided to AHA on a reimbursable basis. Any unexpended portion of the grant may be used for future year expenditures during the term and subject to the conditions of the grant award. Therefore, AHA's FY 2014 Budget includes \$15.2 million in unexpended CFP grant funds.

Funding Not Included in the MTW Single Fund

Replacement Housing Factor (RHF) Grants (Schedule A)

RHF Grants are used to fund activities under AHA's Revitalization Program. HUD calculates RHF funding based on the characteristics of public-housing-assisted units subsidized by AHA that have been demolished or sold, and their replacement has not otherwise been funded by HUD. Similar to CFP funds,

these are provided to AHA on a reimbursable basis. Any unexpended portion of the grant may be used for future year expenditures during the term and subject to the conditions of the grant award. During FY 2014, AHA has projected the use and drawdown of \$11.6 million in RHF funds related to the revitalization of AHA's master-planned communities.

Tenant Dwelling Revenue (Schedule A)

AHA projects it will receive \$5.6 million in Tenant Dwelling Revenue from the 13 AHA-Owned Residential Communities during FY 2014.

Rent collected by the Owner Entities from AHA-assisted residents in mixed-income communities is not revenue to AHA because AHA does not own or control these properties. AHA provides operating subsidy to the Owner Entities of these communities for the AHA-assisted units to the extent rent collected from the AHA-assisted residents does not cover the operating cost attributable and related to such units, pursuant to the regulatory and operating agreement or PBRA Agreement between the Owner Entity and AHA.

Georgia HAP Administrators, Inc. *dba* National Housing Compliance (Schedule A)

AHA will continue its fee-based business relationship with Georgia HAP Administrators, Inc., *dba* National Housing Compliance (NHC). AHA, as a member of NHC, earns unrestricted fees generated by performance-based contract administration (PBCA) services conducted by NHC on behalf of HUD. No MTW or other AHA restricted funds support NHC operations. During FY 2014, AHA projects it will receive approximately \$0.5 million in distributions as an NHC member.

The projected FY 2014 distributions may vary depending on the duration of NHC's contract extensions and the outcome of HUD's award of pending PBCA contracts.

Development and Transaction Fees (Schedule A)

AHA projects that it will close one mixed-income, mixed-finance rental transaction in FY 2014 and earn approximately \$1.0 million in Development and Transaction Fees related to the transaction.

Other Revenue (Schedule A)

During FY 2014, AHA anticipates it will receive \$0.25 from various sources including interest income net of banking fees, cell tower revenue and other miscellaneous revenue.

Sale of AHA Properties

During the first quarter of FY 2014, AHA anticipates it will consummate the sale, for fair market value, of the Roosevelt House site to Georgia Tech, as well as the sale of a 3.9-acre site, originally planned for retail development as part of the Villages of Carver, to Fulton County for the construction of a regional library. Because negotiations are ongoing, these sales are not included in this Budget.

USES OF FUNDS ASSUMPTIONS

Housing Assistance Payments and Voucher Portability Administrative Fees (Schedule B)

During FY 2014, AHA projects it will provide Housing Assistance Payments (HAP) totaling \$142.9 million to various Owner Entities and Landlords, and pay administrative fees of \$1.1 million as follows:

Tenant-Based Vouchers, Homeownership Vouchers and Voucher Portability Administrative Fees (Schedule B)

The Budget includes \$92.5 million to support AHA’s Housing Choice Tenant-based Voucher Program.

- This Budget supports over 9,000 Housing Choice participant households, including approximately 6,700 households in AHA’s jurisdiction and 2,300 households for whom AHA is responsible, but who reside outside AHA’s jurisdiction and have “ported” their voucher to that jurisdiction under HUD’s voucher portability policy. AHA will pay approximately \$1.1 million in Voucher Portability Administrative Fees to other public housing authorities to administer these ported vouchers.
- As stated earlier in the Budget Overview, AHA has committed to serving 21,267 households at the end of FY 2014. To accomplish this goal, AHA intends to issue 500 vouchers to eligible households drawn from AHA’s Housing Choice waiting list.
- AHA plans to initiate two new programs that will use an additional 75 vouchers in FY 2014. The Tenant Based Supportive Housing program will use 50 vouchers for

persons graduating from Shelter-Plus Supportive Housing and 25 vouchers will be used to support a program for children transitioning from foster care.

- This Budget also supports mortgage assistance payments for 64 voucher holders who have purchased homes (using their tenant-based vouchers) to assist them in making their monthly mortgage payments.

Project Based Rental Assistance (PBRA) (Schedule B)

Under the auspices of AHA’s PBRA Program, an Owner Entity agrees with AHA to set aside an agreed percentage of units in its market rate or supportive housing community in exchange for long-term PBRA assistance for such units, thereby making such units affordable to eligible low-income households. To meet its commitment to serve 21,267 households by June 30, 2014, AHA intends to issue several RFPs during FY 2014 to add 364 additional units of supportive housing in existing communities under its PBRA Program.

The FY 2014 Budget includes \$37.6 million in projected HAP to support 4,837 AHA-assisted households at more than 48 participating mixed-income communities and 15 supportive housing communities.

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

Each AHA-Sponsored mixed-income, mixed-finance rental community is owned by a public/private partnership. As a part of the development agreement, AHA provides operating subsidy for AHA-assisted units. The Budget includes \$13.8 million in HAP in the form of operating subsidy to support 2,221

households at 34 rental phases in AHA-Sponsored mixed-use, mixed-income communities.

AHA's Operations (Schedules C and D)

During FY 2014, AHA will complete a reorganization of its operations into three distinct components: Real Estate Group, Customer Services Group and Corporate Support.

Operating Divisions (Schedule C)

The Budget includes \$15.4 million for AHA's Operating Divisions, which follow:

- The new **Real Estate Group** has been organized to help strengthen core competencies and skills in the real estate area. The group formed clearly defines the structure to operate more effectively as a diversified real estate company with a public purpose and mission. The new organization reflects best practices in the real estate industry and brings all AHA real estate activities under one group. This group includes three main functions: Real Estate Development; Real Estate Oversight & Services; and Real Estate Finance & Investments.
- The **Customer Services Group** manages the various components of AHA's tenant-based voucher program and includes the departments of Housing Services, Inspections Services and Human Development Services. This group is responsible for comprehensive service delivery to all AHA Housing Choice participants. This group is a one-stop shop where clients' needs will be assessed and services effectively delivered through strategic partnership with highly skilled service providers. The overall new system is

designed to provide improved access to services to facilitate self-sufficiency.

Corporate Support (Schedule D)

The Budget provides \$27.2 million for Corporate Support, which includes:

- **Executive Office** provides strategic leadership and guidance to the enterprise.
- **Office of General Counsel** provides legal support for AHA's Operating Divisions and Corporate Support through in-house counsel and external legal services.
- **Finance** provides financial leadership and services including accounting, budget and planning, reporting and business intelligence.
- **Records & Information Management (RIM)** was formed to create an enterprise document management capability to centralize the management of AHA records in order to support various ERP projects and provide shared services to all AHA departments, with the ultimate goal of substantially reducing the use of paper. This group supports the life-cycle management of AHA's physical and electronic documents/records, and also provides printing, copying and other administrative services.
- **Information Technology (IT)** leads the technology strategy for AHA including design, implementation and management of the systems required to support operations. This department also provides day-to-day IT support to the enterprise.
- **Acquisition & Management Services (AMS)** leads AHA's contracting and procurement function. This department is

also responsible for AHA's diversity, labor and other regulatory compliance tracking and reporting (i.e., Minority and Women Business Enterprises statistics, Davis-Bacon, e-Verify).

- **Office of Policy & Strategy** leads the development and oversight of corporate policies and the standardization of procedures; leads strategic planning; and drives strategic goal setting and tracking at the enterprise level in partnership with the Program Management Office. This department is accountable for the acquisition of public and private funding sources that support AHA's strategic priorities, as well as leveraging the Centers of Expertise as revenue-generating tools.
- **Enterprise Program Management Office** provides best practice project management services and tools for the enterprise, and facilitates communication, decision-making and alignment with strategic objectives to ensure projects are completed on time and within budget. This department is organized for scalability with a lean core team which can staff-up as required by the business.
- **Community & Governmental Affairs** manages AHA's relations with local government and community stakeholders.
- **Internal Communications** maintains the enterprise standard for all communications, as well as developing and executing AHA's enterprise-wide communications strategy, supporting both AHA's internal company intranet and its external Internet website.
- **Human Resources Operations** leads the people strategy for the enterprise including the organization design, recruitment, talent management, training and professional development.

This department also manages payroll, employee benefits, the pension plan, risk management and employee communications.

- **Internal Audit** will be established in FY 2014 to lead the enterprise in enhancing the monitoring of the effectiveness of internal controls, program compliance, and adherence to policy and regulatory requirements.

Center of Expertise Strategy

As a part of our FY 2014 planning process, we are implementing a Center of Expertise (COE) strategy. By design, COE is a team that brings deep capability in a focused area and provides leadership, best practices, support and training for a defined discipline. These centers will provide services to internal AHA departments outside of their Group. AHA will also leverage these assets by marketing and selling consulting expertise to external entities to create new revenue streams. The Human Development Services team and the Inspections Services team will provide services across the enterprise and will be among the first COEs to be marketed externally, generating new revenue for AHA.

Pay for Performance Program (Schedules C and D)

AHA initiated an employee management and compensation program in FY 2012. This program more closely ties employee compensation to enterprise and individual performance. The FY 2014 Budget includes \$1.3 million in variable pay funds and related employer costs to support the Pay for Performance component of the program. Beginning in FY 2014, as we further evolve our Pay for Performance model, AHA will measure deliverables on a quarterly basis and provide timely reinforcement for achievement of key milestones. The budget

for the Pay for Performance program is split between the Operating Divisions and Corporate Support based on projected salaries.

It is imperative that we maintain our ability to attract and retain the talent required to execute our business plan. This tool enables us to compete for talent in an increasingly competitive labor market.

Employee Salaries Special Funding Restrictions

The 2012 Appropriations Act restricted, for an established period based on an agency's fiscal year, the use of Public Housing Operating Subsidy and Housing Choice Voucher Program funds appropriated in FFY 2012 for the payment of salaries of employees of local housing authorities who earned in excess of \$155,500 during the period from March 17, 2012 to June 30, 2012. AHA had 15 employees with salaries greater than \$155,500 for this period, resulting in approximately \$600,000 in excess of the Congressional limitation. In accordance with guidance from HUD, AHA paid the excess amount from eligible sources during the restricted period.

There is a similar restriction in the Administration's proposed FFY 2014 Budget. If Congress enacts legislation to support the Administration's proposal, eligible funds will be used to pay any amounts in excess of any restrictions on compensation including the Pay for Performance program.

Human Development Support Services & Community Relations (Schedule E)

AHA projects spending approximately \$2.6 million for programs and activities that facilitate access to Human

Development services for AHA-assisted households. These services are in addition to those provided directly by private management companies at AHA-Owned Residential Communities, which are addressed in Schedule F. FY 2014 Human Development Support includes \$550,000 (including \$50,000 for program support) for AHA's new Temporary Emergency Housing Support, which is designed to provide temporary financial assistance to renters who are not participants in other AHA programs.

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

AHA is projecting to spend \$17.2 million to operate AHA-Owned Residential Communities, including Human Development services. In addition, the budget provides \$3.4 million for property maintenance and security at AHA headquarters and at other AHA-Owned real estate.

Modernization of AHA-Owned Residential Communities and AHA Headquarters Capital Expenditures (Schedule G)

AHA is projecting to spend \$5.4 million in FY 2014 to make critical and necessary capital improvements at the AHA-Owned Residential Communities. An additional \$1.3 million will be used to provide pre-development loans to the developers to facilitate the creation of plans for the repositioning of the properties by AHA's Property Management/Developer partners to market-quality standards.

AHA is also projecting to spend \$1.6 million on capital expenditures during FY 2014, including technology investments and capital improvements to AHA's corporate headquarters.

Development and Revitalization (Schedule H)

AHA projects that it will spend \$39.3 million in FY 2014 on:

- Development and revitalization activities as AHA and its private-sector development partners continue to advance the master plans for seven AHA-sponsored master-planned, mixed-use, mixed-income communities;
- Advancing the Choice Neighborhood transformation plan with its private-sector development partner;
- Applying for a Choice Neighborhood Implementation grant for the continued revitalization of the University Homes site and the surrounding neighborhoods in the study area; and
- Beginning the exploration of opportunities for the development of other AHA properties.

ERP Solution (Schedule I)

As a key component of its Business Transformation Initiative, AHA will complete its implementation of the major components of the ERP Solution, and anticipates spending approximately \$2.4 million during FY 2014, bringing the total projected spend to \$14.3 million.

Non-ERP Hardware and Software Solutions (Schedule J)

In addition to the implementation of ERP, AHA anticipates redesigning its Internet and intranet sites, and implementing a contract management software solution in FY 2014. AHA projects it will spend \$0.5 million on these projects.

Debt Service on Energy Performance Contract (EPC) Bank Loan (Sources and Uses of Funds (Consolidated) Schedule and Schedule A)

In FY 2012, AHA entered into an energy performance contract (EPC) which used a \$9.1 million EPC bank loan along with supplemental MTW funds to further implement energy conservation and efficiency solutions at the AHA-Owned Residential Communities. These improvements are substantially complete. The FY 2014 debt service for the EPC loan is \$0.9 million. HUD's EPC program provides for continued HUD subsidy funding at the utility consumption rates existing prior to the improvements. Utility savings realized from the improvements, therefore, are designed to cover the debt service.

USES OF ACCUMULATED CASH BALANCES

AHA has accumulated cash in prior years which is classified as either “Unrestricted” or “Restricted” based on HUD guidance:

Unrestricted Cash — includes cash that is available for any program purposes including current operations. Because the funds are not tied to a certain program or property, they are classified as unrestricted. They remain subject, however, to varying degrees of HUD restrictions. For example, HUD approval is required, with some limited exceptions, to use or deploy these funds strategically outside of the ordinary course of AHA’s business under the MTW Agreement. In all cases, AHA’s assets are subject to the limitations of AHA’s charter and the Housing Authorities Laws of the State of Georgia.

Restricted Cash — includes cash that is only to be expended for specific purposes based on the source of the money. AHA’s restricted cash generally includes: proceeds from the sale of property acquired with grant or development funds; program income from specific grants; income generated from development activities; partnership operating reserves; and public improvement funds. The majority of these funds are restricted to revitalization activities.

Non-current Year Sources of Funds (Sources and Uses of Funds (Consolidated) Schedule and Schedule A)

- **Drawdown of Reserves Accumulated and Restricted for Revitalization Activities**

AHA, in partnership with its private-sector development partners, will continue to advance its revitalization master plans for sustainable, market-rate quality, mixed-use, mixed-income communities. During FY 2014, AHA anticipates

using approximately \$0.2 million in Restricted Cash that has been accumulated for these purposes. AHA will use RHF grants, MTW reserves and Public Improvement funds from the City of Atlanta and its affiliates to leverage private sources of funds raised by its private-sector development partners to advance the revitalization activities.

- **Drawdown of MTW Reserves for Revitalization Activities**

In accordance with the terms of AHA’s MTW Agreement, HUD has provided AHA funds under the Housing Choice Voucher Program, Public Housing Operating Subsidy and Capital Fund Program each year since 2004, which are combined into AHA’s MTW Single Fund. If annual MTW Single Fund revenue exceeds the MTW expenditure, the balance is transferred to AHA’s MTW reserves to be used for planned MTW activities in future years and to supplement future annual HUD MTW funds when proration reduces funding below levels necessary to meet AHA’s mission and MTW objectives. During FY 2014, AHA anticipates using \$26.3 million in MTW reserves to support AHA’s revitalization activities.

Public Improvement Funds provided by the City of Atlanta and Affiliates

The City of Atlanta and its affiliates have supported AHA’s Revitalization Program activities by providing funds for infrastructure and other public improvements in the public right-of-way. These funds typically have come from the sale of special purpose bonds (e.g., Tax Allocation District (TAD) bonds and Water & Sewer bonds). Depending on the source of funding, the City either provides the funds to AHA in advance of construction or as reimbursement for completed construction.

During FY 2014, AHA anticipates using \$2.1 million in Public Improvement Funds provided by the City of Atlanta and Affiliates. Pursuant to agreements with the City, AHA's private-sector development partners execute the public improvement work in order to better coordinate and integrate the construction-related activities.

RECLASSIFICATIONS WITHIN THE FY 2014 BUDGET

AHA is authorized to reallocate between departments, funding sources and accounts, as necessary, to execute the FY 2014 Annual MTW Plan as long as AHA remains within the FY 2014 Budget authority approved by the Board of Commissioners.

BUDGET TO ACTUAL REPORTING

At least quarterly, AHA will provide reports to the Board of Commissioners of actual revenue and expenditures against the FY 2014 Budget and explain significant variances.

The Housing Authority of the City of Atlanta, Georgia

FY 2014 Budget

(Excludes Non-cash Items)

Schedule

Sources & Uses of Funds (Consolidated)

Sources of Funds

Housing Choice Voucher Program (HCVP)	\$185,139,920
Public Housing Operating Subsidy	13,650,684
Capital Fund Program (CFP)	15,202,406
Total MTW Single Fund	\$213,993,010
Replacement Housing Factor (RHF) Grants	\$11,616,438
Tenant Dwelling Revenue	5,566,578
Georgia HAP Administrators, Inc., <i>dba</i> National Housing Compliance (NHC)	500,000
Development and Transaction Fees	1,028,400
Other Revenue	250,400

A	Total Sources of Funds	\$232,954,826
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This schedule is continued on the following page

The Housing Authority of the City of Atlanta, Georgia

FY 2014 Budget

(Excludes Non-cash Items)

Schedule

Sources & Uses of Funds (Consolidated)

Schedule continued from previous page

Uses of Funds

B	Housing Assistance Payments (HAP) and Administrative Fees:	\$143,972,261
C	Operating Divisions	15,444,131
D	Corporate Support	27,194,041
E	Human Development Support Services and Community Relations	2,555,629
F	Operating Expense for AHA-Owned Residential Communities / Other AHA Properties	20,622,298
G	Modernization of AHA-Owned Residential Communities / AHA Headquarters Capital Expenditures	8,260,334
H	Development and Revitalization	39,259,944
I	ERP Solution	2,410,945
J	Non-ERP Hardware and Software Solutions	525,000
	Debt Service on Energy Performance Contract (EPC) Bank Loan	984,749

Total Uses of Funds **\$261,229,332**

Uses in Excess of Sources of Funds **(\$28,274,506)**

Non-current Year Sources of Funds

Reserves Accumulated in Prior Periods

Drawdown of Reserves Accumulated and Restricted for Revitalization Activities	\$207,451
Drawdown of MTW Reserves for Revitalization Activities	26,323,055

Public Improvement Funds Provided by the City of Atlanta and Affiliates 2,114,000

Total Non-current Year Sources of Funds **\$28,644,506**

Funds Not Used for Current Year's Activities **\$370,000**

The Housing Authority of the City of Atlanta, Georgia

FY 2014 Budget

Sources & Uses of Funds by Major Activities and Programs Schedule A

Schedule		MTW Single Fund	Georgia HAP <i>dba</i> NHC	Revitalization Activities	Total
	Sources of Funds				
	Housing Choice Voucher Program (HCVP)	\$185,139,920	\$0	\$0	\$185,139,920
	Public Housing Operating Subsidy	13,650,684			13,650,684
	Capital Fund Program (CFP)	15,202,406			15,202,406
	Replacement Housing Factor (RHF) Grants			11,616,438	11,616,438
	Tenant Dwelling Revenue	5,566,578			5,566,578
	Georgia HAP Administrators, Inc., <i>dba</i> National Housing Compliance (NHC)		500,000		500,000
	Development and Transaction Fees *	1,028,400			1,028,400
	Other Revenue	250,400			250,400
A	Total Sources of Funds	\$220,838,388	\$500,000	\$11,616,438	\$232,954,826
	Uses of Funds and Accumulated Cash Balances				
B	Housing Assistance Payments (HAP) and Administrative Fees:	\$143,972,261	\$0	\$0	\$143,972,261
C	Operating Divisions	14,443,131	0	1,001,000	15,444,131
D	Corporate Support	27,064,041	130,000	0	27,194,041
E	Human Development Support Services and Community Relations	2,555,629	0	0	2,555,629
F	Operating Expense for AHA-Owned Residential Communities / Other AHA Properties	20,622,298	0	0	20,622,298
G	Modernization of AHA-Owned Residential Communities / AHA Headquarters Capital Expenditures	8,260,334	0	0	8,260,334
H	Development and Revitalization	0	0	39,259,944	39,259,944
I	ERP Solution	2,410,945	0	0	2,410,945
J	Non-ERP Hardware and Software Solutions	525,000	0	0	525,000
	Debt Service on Energy Performance Contract (EPC) Bank Loan	984,749	0	0	984,749
	Total Uses of Funds	\$220,838,388	\$130,000	\$40,260,944	\$261,229,332
	Uses in Excess of Sources of Funds	\$0	\$370,000	(\$28,644,506)	(\$28,274,506)
	Non-current Year Sources of Fund				
	Reserves Accumulated in Prior Periods				
	Drawdown of Reserves Accumulated and Restricted for Revitalization Activities	\$0	\$0	\$207,451	\$207,451
	Drawdown of MTW Reserves for Revitalization Activities	0	0	26,323,055	26,323,055
	Public Improvement Funds Provided by the City of Atlanta and Affiliates	0	0	2,114,000	2,114,000
	Total Non-current Year Sources of Funds	\$0	\$0	\$28,644,506	\$28,644,506
	Funds Not Used for Current Year's Activities **	\$0	\$370,000	\$0	\$370,000

* Development and Transaction Fees are included under the MTW Single Fund for simplicity of presentation. Such fees frequently have limitations on their use and, therefore, although they are reflected as a source of funds for FY 2014, when received AHA will include these funds in its reserves.

** Net income generated from participation in Georgia HAP Administrators, Inc. *dba* National Housing Compliance, is AHA's least restricted funding source and is only used for selected activities.

The Housing Authority of the City of Atlanta, Georgia
FY 2014 Budget

Housing Assistance Payments (HAP) and Administrative Fees
Schedule B

Tenant-Based & Homeownership Vouchers and Voucher Portability Administrative Fees	\$92,514,025
Project Based Rental Assistance (PBRA)	37,613,870
Mixed-Income Communities Operating Subsidy for AHA-Assisted Units	13,844,366
Total Housing Assistance Payments (HAP) and Administrative Fees	\$143,972,261

The Housing Authority of the City of Atlanta, Georgia

FY 2014 Budget

Operating Divisions Schedule C

Operating Divisions	Salaries, Benefits & Taxes	Professional Services	Outsourced Real Estate Services	Other Staff Augmentation	Other	Total
Customer Services Group	\$6,320,379	\$443,560	\$91,550	\$363,085	\$197,713	\$7,416,287
Real Estate Group	4,291,075	517,141	2,594,888	0	70,047	7,473,151
Pay for Performance Program	554,693	0	0	0	0	554,693
Total	\$11,166,147	\$960,701	\$2,686,438	\$363,085	\$267,760	\$15,444,131

The Housing Authority of the City of Atlanta, Georgia

FY 2014 Budget

Corporate Support Schedule D

	Salaries, Benefits & Taxes	Professional Services	Outsourced Real Estate Services	Other Staff Augmentation	Software Maint., Licenses & Non- Capitalized Hardware/ Software	Other	Total
Corporate Support							
Executive Office	\$530,797	\$84,000	\$0	\$0	\$0	\$187,917	\$802,714
General Counsel including External Legal Services	2,036,937	530,000	0	0	0	74,375	2,641,312
Finance	1,841,267	501,500	0	28,600	0	16,050	2,387,417
Internal Audit	123,155	150,000	0	0	0	5,000	278,155
Records & Information Management	1,343,002	0	0	0	0	780,929	2,123,931
Information Technology	4,019,670	695,000	14,300	487,036	1,351,333	439,380	7,006,719
Acquisition & Management Services	998,609	0	0	0	0	54,320	1,052,929
Office of Policy & Strategy	1,058,190	1,050,000	0	0	0	51,427	2,159,617
Enterprise Program Management Office	495,963	0	103,840	840,027	0	14,500	1,454,330
Community & Governmental Affairs	335,385	0	0	0	0	6,830	342,215
Internal Communications	296,524	15,000	0	0	0	15,908	327,432
Human Resources Operations	1,132,570	208,530	0	0	0	182,493	1,523,593
Activities Managed by Human Resources Department:							
Professional Development & Training	45,000	0	0	0	0	523,000	568,000
Business Transformation & Change Management	0	590,000	0	0	0	36,700	626,700
HR Technology Solutions	0	76,470	0	0	0	0	76,470
Recruitment Fees	0	200,000	0	0	0	0	200,000
Risk Management	159,000	2,200	0	0	0	571,000	732,200
Severance & Related Expense	0	50,000	0	0	0	300,000	350,000
Pension Contribution	0	0	0	0	0	1,500,000	1,500,000
Pension Consulting Services	0	150,000	0	0	0	0	150,000
Agency-wide Temporary Services	0	0	0	145,000	0	0	145,000
Pay for Performance Program	745,307	0	0	0	0	0	745,307
Total	\$15,161,376	\$4,302,700	\$118,140	\$1,500,663	\$1,351,333	\$4,759,829	\$27,194,041

The Housing Authority of the City of Atlanta, Georgia

FY 2014 Budget

Human Development Support Services and Community Relations Schedule E

Community Relations*	\$20,000
Human Development Support**	1,985,629
Temporary Emergency Housing Support***	550,000
Total Human Development Support Services and Community Relations	\$2,555,629

* Community Relations includes support for a variety of civic activities.

** Human Development Support includes activities such as the provision of intensive case management for families with complex needs, the Good Neighbor training program, Aging Well programs for seniors, supportive services, and activities for youth.

*** Temporary emergency Housing Support provides temporary rental assistance to households not participating in other AHA programs.

The Housing Authority of the City of Atlanta, Georgia

FY 2014 Budget

Operating Expense for AHA-Owned Residential Communities / Other AHA Properties Schedule F

	Administrative Expense	Utilities	Maintenance & Operations	Protective Services	Other	Human Development Services	Total
AHA-Owned Residential Communities							
Barge Road Highrise	\$239,916	\$182,712	\$353,344	\$175,381	\$48,840	\$139,454	\$1,139,646
Cheshire Bridge Road Highrise	355,555	271,246	575,305	137,221	44,026	179,017	1,562,370
Cosby Spear Highrise	500,833	504,531	866,459	322,140	71,264	180,115	2,445,342
East Lake Highrise	291,515	214,361	427,528	135,508	42,207	127,677	1,238,796
Georgia Avenue Highrise	194,845	154,523	347,462	126,760	20,794	102,201	946,586
Hightower Manor Highrise	239,546	181,767	372,114	175,381	50,005	134,807	1,153,620
Juniper and Tenth Highrise	310,742	265,233	436,667	205,750	50,121	145,838	1,414,351
Marian Road Highrise	365,188	396,831	495,954	188,612	80,021	210,130	1,736,736
Marietta Road Highrise	231,938	190,762	343,183	173,629	45,583	140,669	1,125,765
Martin Street Plaza	146,857	207,607	261,528	141,848	12,706	79,243	849,789
Peachtree Road Highrise	388,088	335,508	534,517	141,471	56,919	179,478	1,635,980
Piedmont Road Highrise	390,402	352,721	542,573	142,881	45,706	143,324	1,617,607
Westminster	77,002	93,395	115,142	20,340	12,269	13,200	331,348
Total AHA-Owned Residential Communities	\$3,732,427	\$3,351,196	\$5,671,777	\$2,086,923	\$580,460	\$1,775,153	\$17,197,935
Other AHA Properties							
AHA Headquarters Building	\$321,701	\$259,397	\$934,272	\$662,367	\$24,516	\$0	\$2,202,252
Zell Miller Center	19,392	36,770	78,856	0	0	0	135,018
PILOT and Other AHA Land	0	184,655	648,934	0	253,504	0	1,087,093
Total Other AHA Properties	\$341,093	\$480,822	\$1,662,062	\$662,367	\$278,020	\$0	\$3,424,363
Total	\$4,073,520	\$3,832,018	\$7,333,838	\$2,749,289	\$858,480	\$1,775,153	\$20,622,298

The Housing Authority of the City of Atlanta, Georgia

FY 2014 Budget

Modernization of AHA-Owned Residential Communities / AHA Headquarters Capital Expenditures Schedule G

	Pre-development Activities	Renovations	Total
Modernization of AHA-Owned Residential Communities			
Barge Road Highrise	\$91,667	\$371,916	\$463,583
Cheshire Bridge Road Highrise	100,000	\$771,690	871,690
Cosby Spear Highrise	183,333	\$670,165	853,498
East Lake Highrise	100,000	\$204,151	304,151
Georgia Avenue Highrise	50,000	\$367,406	417,406
Hightower Manor Highrise	91,667	\$612,966	704,633
Juniper and Tenth Highrise	100,000	\$352,835	452,835
Marian Road Highrise	166,667	\$327,431	494,098
Marietta Road Highrise	91,667	\$297,334	389,001
Martin Street Plaza	50,000	\$180,203	230,203
Peachtree Road Highrise	116,667	\$616,460	733,127
Piedmont Road Highrise	133,333	\$520,530	653,863
Westminster	33,333	\$98,913	132,246
Total AHA-Owned Residential Communities	\$1,308,334	\$5,392,000	\$6,700,334
			Capital Expenditures
AHA Headquarters Capital Expenditures			
Technology Investments			\$651,000
Capital Improvements to AHA Corporate Headquarters			882,000
Equipment			27,000
Total AHA Headquarters Capital Expenditures			\$1,560,000
Total			\$8,260,334

The Housing Authority of the City of Atlanta, Georgia

FY 2014 Budget

ERP Solution Schedule I

	Original Projections <u>Before</u> Discovery, Design and Planning (DDP) - Approved by Board in January 2011	Revised Projections <u>After</u> Discovery, Design and Planning (DDP) - Approved by the Board in June 2012	Total Projected Costs - Line Items <u>Realigned</u> Based on Revised Estimates	Projected Spend by Period		
				Projected Costs thru June 30, 2013	Budgeted Costs for FY 2014	Projected Costs for FY 2015
One-time Investment						
YARDI Professional Services excluding Orion						
Discovery, Design and Planning (DDP)	\$598,200	\$598,200	\$598,200	\$598,200	\$0	\$0
Implementation Services	1,940,473	2,584,480	2,990,199	2,114,222	875,977	0
Customizations	400,000	875,600	645,576	570,576	75,000	0
Total YARDI Professional Services excluding Orion	\$2,938,673	\$4,058,280	\$4,233,975	\$3,282,998	\$950,977	\$0
Bolt-ons, Extensions, Integrations and Related Services plus ECM Software and Related Services	\$3,216,182	\$3,166,375	\$3,387,219	\$2,995,671	\$391,548	\$0
Hardware	422,216	325,000	238,824	238,824	0	0
Transformation Strategy, Planning & DDP Support	4,280,000	4,280,000	4,280,000	4,178,130	101,870	0
Total One-Time Investment	\$10,857,071	\$11,829,655	\$12,140,018	\$10,695,623	\$1,444,395	\$0
Software Licensing Costs	\$1,886,375	\$2,010,625	\$1,700,262	\$752,163	\$466,550	\$481,550
Total Projected Investment Excluding Contingency	\$12,743,446	\$13,840,280	\$13,840,280	\$11,447,786	\$1,910,945	\$481,550
Contingency	\$0	\$500,000	\$500,000	\$0	\$500,000	\$0
Total Projected Investment*	\$12,743,446	\$14,340,280	\$14,340,280	\$11,447,786	\$2,410,945	\$481,550

* As a component of the Enterprise-wide Business Transformation Initiative, the ERP Solution is supported by AHA's Operating Divisions and Corporate Support. See Schedules C and D.

The Housing Authority of the City of Atlanta, Georgia
FY 2014 Budget

Non-ERP Hardware and Software Solutions
Schedule J

Non-ERP Hardware and Software Solutions

Intranet and Internet Redesign	\$475,000
e-Procurement Solution	50,000

Total Non-ERP Hardware and Software Solutions **\$525,000**

2. Capital Planning – FY 2015

Major Capital Needs and Projects, Estimated Costs and Proposed Timetables

This section describes AHA's capital plans using MTW funds. In FY 2015, AHA projects it will continue to dedicate funds toward capital improvement projects and related construction management and design fees at the 13 AHA-Owned Residential Communities.

AHA established three priorities for FY 2015 capital improvements at the AHA-Owned Residential Communities:

1. Health and safety of residents
2. Property viability
3. Energy conservation

The expected sites for the work include all the AHA-Owned Residential Communities: Barge Road Highrise, Cheshire Bridge Road Highrise, Cosby Spear Highrise, East Lake Highrise, Georgia Avenue Highrise, Hightower Manor Highrise, Juniper and Tenth Highrise, Marian Road Highrise, Marietta Road Highrise, Martin Street Plaza, Peachtree Road Highrise, Piedmont Road Highrise, and Westminster.

3. Combined Statements of Revenue, Expense and Changes in Net Position

For the Year Ended June 30, 2013

	<u>FY 2013</u>
Operating revenue:	
MTW Single Fund used for operations	193,894,971
ARRA grant used for operations	-
Tenant dwelling revenue	5,595,112
Development grants used for operations	1,848,148
Fees earned from National Housing Compliance	820,022
Other operating revenue	<u>2,983,292</u>
Total operating revenue	205,141,545
Operating expense:	
Housing assistance payments	136,984,767
Administrative including direct operating division expense	48,844,339
Utilities, maintenance and protective services	13,095,127
Resident and participant services	3,614,930
General expense	1,497,723
Expense related to National Housing Compliance	176,669
Depreciation and amortization	<u>11,252,920</u>
Total operating expense	<u>215,466,475</u>
Net operating income	(10,324,930)
Non-operating revenue:	
MTW Single Fund used for Modernization of AHA-Owned Properties	12,186,023
Capital grant revenue — revitalization related	6,026,678
Interest and investment income	537,228
Gain (loss) on sale of assets	<u>(22,645)</u>
Total non-operating revenue	18,727,284
Non-operating expense:	
Demolition and remediation expense	235,445
Other revitalization expense	769,591
Relocation-related expense	-
Valuation allowance	367,413
Interest expense	<u>232,730</u>
Total non-operating expense	<u>1,605,179</u>
Change in net assets	6,797,175
Net assets — beginning of year	<u>433,239,993</u>
Net assets — end of year	<u>440,037,168</u>

SOURCE: AHA Comprehensive Annual Financial Report and Independent Auditors' Report For the fiscal years ended June 30, 2013 and 2012



Amended and Restated Statement of Corporate Policies

Adopted by the Board of Commissioners

April 3, 2014

The Housing Authority of the City of Atlanta, Georgia
Amended and Restated Statement of Corporate Policies

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The Housing Authority of the City of Atlanta, Georgia

Amended and Restated Statement of Corporate Policies

PREAMBLE

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

The Statement of Corporate Policies is comprised of three sections:

- A. Statement of Policies Governing the Leasing and Residency of Assisted Apartments**
- B. Statement of Policies Governing the Housing Choice Tenant-Based Program**
- C. Statement of Policies for Supportive Housing**

The operating departments and management agents, as appropriate, (“Operations”) are responsible for developing operating procedures in accordance with the policies set forth in the Statement of Corporate Policies.

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

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Section A.

*Statement of Policies
Governing the Leasing and Residency of Assisted Apartments*

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The Housing Authority of the City of Atlanta, Georgia

Statement of Policies Governing the Leasing and Residency of Assisted Apartments

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The Housing Authority of the City of Atlanta, Georgia
Statement of Policies
Governing the Leasing and Residency of Assisted Apartments

PREAMBLE

This *Statement of Policies Governing the Leasing and Residency of Assisted Apartments* (“Statement of Policies”) is the policy document that governs the leasing and residency of public housing-assisted apartments owned, affiliated, or sponsored by The Housing Authority of the City of Atlanta, Georgia (“Atlanta Housing Authority”).

For purposes of the Statement of Policies, any apartment that receives public housing operating subsidy, regardless of the ownership structure of the community in which the apartment is located, is referred to as an “Assisted Apartment.” Atlanta Housing Authority-owned public housing developments with Assisted Apartments are referred to as “Affordable Communities.” Privately-owned market rate, mixed income communities with a percentage of Assisted Apartments are referred to as “Signature Communities” or “Mixed-Income, Mixed-Finance Communities.” These communities are owned by a limited partnership or similar ownership structure (“Owner Entity”); are sponsored and/or developed, in part, by Atlanta Housing Authority, who may or may not have a ground lease on the real estate; and are independently operated by the Owner Entity’s managing general partner and professional management company.

Atlanta Housing Authority and the U.S. Department of Housing and Urban Development (HUD) entered into the Amended and Restated Moving to Work Agreement, effective as of November 13, 2008, as further amended by that certain Second Amendment to the Moving to Work Agreement, effective as of January 16, 2009, as may be amended or extended from time to time (“MTW Agreement”). As a result of the statutory and regulatory relief provided to Atlanta Housing Authority under the MTW Agreement, the Statement of Policies outlines policies that support the creative design and implementation of initiatives to enhance the quality of life of residents, promote resident economic and lifestyle independence and foster the development of excellent, mixed-income communities.

The Statement of Policies, formerly the Statement of Corporate Policies Governing the Leasing and Residency of Assisted Apartments (“Former Statement of Corporate Policies”), was first adopted by Atlanta Housing Authority’s Board of Commissioners on June 16, 2004. This Statement of Policies represents the amendment and restatement of those policies and therefore supersedes all prior amended and restated versions of the Former Statement of Corporate Policies, and is hereby incorporated into this amended and restated Statement of Corporate Policies as Section A.

Administrative procedures, processes, protocols, and management practices for any policy, initiative, or approach shall be developed following the intent of the Statement of Policies and, subject to prior review and approval, may be amended from time to time at the discretion of Atlanta Housing Authority.

PART I - INTRODUCTION

ARTICLE ONE. OBJECTIVE

The Statement of Policies is Atlanta Housing Authority's policy document for the leasing and occupancy of Assisted Apartments in support of Atlanta Housing Authority's Vision of Healthy Mixed-Income Communities; Healthy Self-Sufficient Families.

ARTICLE TWO. MANAGEMENT AND ADMINISTRATION

1. Atlanta Housing Authority and, as designated by Atlanta Housing Authority, the professional private-sector management companies it engages to manage Affordable Communities are responsible for developing and implementing written operating procedures for the Affordable Communities that are consistent with the Statement of Policies.
2. Owner Entities and the professional private-sector management companies they engage are responsible for developing and implementing written operating procedures for the Signature Communities that are consistent with the Statement of Policies and to the requirements of other funding sources to the extent that Signature Communities may be subject to stricter requirements. Such operating procedures are subject to review by Atlanta Housing Authority with respect to the intent of any related policies and requirements.
3. For the purposes of the Statement of Policies the operating procedures under Sections 1 and 2 above are referred to as Management Operating Procedures.
4. For the purposes of the Statement of Policies, Atlanta Housing Authority's and Owner Entity's private management companies, collectively or individually, as appropriate, will be referred to as "Management Agent."

ARTICLE THREE. MOVING TO WORK ANNUAL PLAN

1. As a Moving to Work agency, Atlanta Housing Authority will establish, implement and evaluate innovative cost-effective affordable housing strategies for Assisted Apartments that are designed to improve operational efficiencies and help low income families achieve greater economic independence.
2. While recognizing that implementation of various policy initiatives may be immediate, progressive, or refined through various activities and demonstration programs, the implementation of those strategic initiatives, not expressly enumerated in Atlanta Housing Authority's Moving to Work (MTW) Annual Plan, may be advanced, provided such strategic initiatives are consistent with the Statement of Policies and the spirit and intent of the authorizations under the MTW Agreement.

ARTICLE FOUR. APPLICABILITY OF POLICIES TO APPLICANTS AND RESIDENTS

The Statement of Policies applies to all Applicants, Residents, and members of Applicant and Resident households. The singular use of the terms “Resident” and “Applicant” shall be deemed to include all household members for the purposes of this Statement of Policies.

ARTICLE FIVE. SITE-BASED WAITING LIST POLICY

The Site-Based Waiting List Policy established the equitable and consistent administration of independent site-based waiting lists at each AHA-owned Affordable Community and each Signature Community. This policy provides for the fair and equitable selection of eligible and qualified Applicants from a community waiting list rather than from a centralized pool. Although an Applicant can lease only one Assisted Apartment, Applicants have the freedom to submit applications to the site-based waiting list of the community or communities of their choice, provided the site-based waiting list is open and receiving applications.

The implementing protocols for the administration of site-based waiting lists are memorialized as separate policy documents approved by HUD and are hereby included, by reference, in this Statement of Policies. In addition, AHA’s MTW Agreement states that AHA will continue to operate site-based waiting lists in accordance with the existing HUD-approved policies and provides further that AHA, at its option, has the authority to develop and administer other site-based waiting lists to address various situations.

ARTICLE SIX. FAIR HOUSING AND EQUAL OPPORTUNITY

1. Atlanta Housing Authority supports all applicable Federal and State nondiscrimination and fair housing laws and applicable HUD regulations in all housing and program activities. Atlanta Housing Authority monitors fair housing and equal opportunity compliance at all of the communities governed by this Statement of Policies.
2. Atlanta Housing Authority supports the protections afforded victims under the *Violence Against Women Act*, and has included administrative measures to address those protections in its Management Operating Procedures, as applicable.
3. Atlanta Housing Authority acknowledges the importance of serving persons with Limited English Proficiency (LEP). Atlanta Housing Authority has developed a LEP plan to identify and offer assistance to Applicants and Residents having LEP. Persons with LEP are individuals who, because of their national origin, do not speak English as their primary language and who have a limited ability to speak, read, write or understand English. In accordance with Federal guidelines, Atlanta Housing Authority will make reasonable efforts to provide or arrange language assistance for Applicants and Residents with LEP if they require such assistance in order to access Atlanta Housing Authority’s programs and client activities.

ARTICLE SEVEN. REASONABLE ACCOMMODATION

1. Atlanta Housing Authority is committed to assisting persons with disabilities. Atlanta Housing Authority, Owner Entities and their respective Management Agents they engage will make reasonable accommodations in policies, procedures, rules and services when such accommodations are necessary to afford persons with disabilities an equal opportunity to participate in or benefit from its programs. Requests for accommodations must be reasonable, meaning Atlanta Housing Authority and Owner Entities through their respective Management Agents are not required to provide accommodations which would cause either undue financial and administrative burden or a fundamental alteration in the nature of Atlanta Housing Authority's programs. Requests for Reasonable Accommodations will be considered on a case-by-case basis so that Atlanta Housing Authority, Owner Entities and Management Agents, as applicable, can consider, among other factors, the cost of the requested accommodation, the benefits that the accommodation would provide to the requester and the availability of alternative accommodations that would effectively meet the requester's disability-related needs. These reasonable accommodations shall extend to Atlanta Housing Authority's applications procedures, program participation and facilities enhancement activities.
2. For reasonable accommodations purposes, HUD defines a "person with disabilities" or "disabled person" as a person who has a physical or mental impairment that substantially limits one or more major life activities; has a record of such impairment; or is regarded as having such an impairment. Atlanta Housing Authority, the Owner Entities and their respective Management Agents apply this definition to reasonable accommodations requests. (The definition of a "person with disabilities" or "disabled person" for the purpose of determining program eligibility, including (a) admission to Affordable Communities where the Resident Population is comprised of Elderly, Almost-Elderly and/or Non-Elderly Disabled Residents and (b) exemption from Atlanta Housing Authority's work requirement, is set forth at Part II, Article Four, Section 1.)
3. Atlanta Housing Authority and Owner Entities through their respective Management Agents have (i) set forth the process for Applicants and Residents who participate in programs in Affordable Communities and/or Signature Communities to request reasonable accommodations; (ii) provided forms for individuals to request reasonable accommodation(s); (iii) set forth specific procedures regarding the acceptance, processing and disposition of reasonable accommodation request(s), including target timeframes; and (iv) provided formal appeal/grievance procedures for individuals who have been denied reasonable accommodation(s). Persons with disabilities who require a Reasonable Accommodation because of a disability, or persons making a request on behalf of a person with disabilities should submit a request to the Management Agent, preferably using the request forms the Management Agent provides in order to simplify processing; however, use of specific forms is not required. The requester may be asked to provide verification of the need for the accommodation from a doctor or other professional who has direct knowledge of the subject disability if the need for the request is not obvious to the Management Agent. The verifier will be asked to provide reliable verification

that the person seeking the accommodation is a person with disabilities and the person needs the accommodation to afford an equal opportunity to participate in or benefit from the subject Atlanta Housing Authority program.

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

ARTICLE EIGHT. DECONCENTRATION OF POVERTY

1. In order to realize its corporate vision of Healthy Mixed-Income Communities/Healthy Self-Sufficient Families, Atlanta Housing Authority is pledged to outcomes that lead to the deconcentration of poverty in the management of its Affordable Communities and the creation of market rate, mixed income communities.
2. Atlanta Housing Authority's fair and equitable Site-Based Waiting List Policy for Assisted Apartments at each Affordable and Signature Community strengthens the concepts of community building and housing choice. Based on available housing opportunities, Applicants choose communities according to location, amenities, job opportunities, schools, and neighborhoods. The result is a policy approach that supports the deconcentration of poverty.
3. Under Moving to Work, Atlanta Housing Authority has the authority to pursue locally driven policies, procedures and programs with the aim of developing better, more efficient and effective ways of providing quality, mixed-income housing to low income families
4. Atlanta Housing Authority will also continue to reposition its portfolio of distressed and obsolete public housing developments through a variety of strategies, foremost of which is the transformation of its conventional public

housing developments into market-rate, mixed-income communities, each with a seamless affordable component and households having a range of incomes and diverse backgrounds.

ARTICLE NINE. FRAUD AND MISREPRESENTATION

1. Applicants and Residents are required to provide truthful, complete information to Atlanta Housing Authority, Owner Entities and their respective Management Agents, including but not limited to information relating to participation in other housing subsidy programs, income from all sources, employment status of all household members, household composition, and all household background information to qualify for initial eligibility and continued residency in an Assisted Apartment.
2. Applicants and Residents who engage in acts of fraud and misrepresentation are subject to prosecution under State and Federal laws, and where appropriate, will be referred for such prosecution by Atlanta Housing Authority, Owner Entities and their respective Management Agents.
3. Any Applicant or Resident who has made any intentional misrepresentation, or who has omitted or misrepresented material information, at the time of admission, during any subsequent Lease Renewal Review, or at any other time shall be denied admission or be subject to termination or non-renewal of tenancy, as applicable. Such Applicants and Residents will be afforded the right to an informal review pursuant to this Statement of Policies.

ARTICLE TEN. PRIVATE SECTOR INNOVATION

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

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

PART II – APPLICANT AND RESIDENT SUITABILITY

ARTICLE ONE. DEFINITIONS OF FAMILY

1. A Family is defined as one or more persons who may or may not be related that are residing together in the same household.
2. An Elderly Family is defined as a Family in which the head-of-household, co-head, spouse, or sole adult member of the household is age 62 or older.
3. A Disabled Family is defined as a Family in which the head-of-household, co-head, spouse, or sole adult member of the household is a person with a verified qualifying disability. The definition of a “person with disabilities” in this context is consistent with HUD’s definition of a “person with disabilities” for program eligibility purposes, and is set forth at Part II, Article Four, Section 1, Paragraph F.
4. Any member of a Resident household who is under the age of 18, a person (other than the head, co-head or spouse) with a verified qualifying disability and a full-time student (subject to documented verification) up to the age of 24 will be considered a dependent of the Resident household. The definition of a “person with disabilities” in this context is consistent with HUD’s definition of a “person with disabilities” for program eligibility purposes, and is set forth at Part II, Article Four, Section 1, Paragraph F.

ARTICLE TWO. DETERMINING CRITERIA

1. An Applicant desiring to lease an Assisted Apartment must first demonstrate all of the following:
 - A. Applicant meets one of the definitions of Family and is an eligible low income household based on total annual household income pursuant to and verified according to U. S. Department of Housing and Urban Development (HUD) rules and regulations and as provided in Atlanta Housing Authority’s MTW Annual Plan;
 - B. Applicant satisfies HUD’s statutory and regulatory requirements for citizenship/eligible immigrant status;
 - C. Each school-age member of the Applicant’s household who is under 18 years of age and who has not completed her/his secondary education may be required to enroll and attend an accredited public or private secondary academic or technical school;
 - D. Applicant would be a suitable Resident based on past satisfactory behavior including, but not limited to, housekeeping performance, acceptable payment records for rent and/or utilities (as applicable), acceptable credit history, acceptable criminal background record, and a commitment to abide by the Dwelling Lease offered to eligible Applicants (the “Lease”); and

E. Compliance with Atlanta Housing Authority's Work Requirement. The Work Requirement is as follows:

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

AND

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

- a. Full-time work:

Legally employed or self-employed on a full-time basis at least 30 hours per week;

- b. Full-time school:

Enrolled in and attending an AHA-recognized school or institution as a full-time student; or

- c. Part-time work and part-time school/training for a combined minimum of 30 hours per week of employment and education/training:

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

- (ii) And one of the following:

- (a) Enrolled in and attending an AHA-recognized school or institution on a part-time basis, or

- (b) Participating in an AHA-recognized training program.

F. Exemptions from Atlanta Housing Authority's Work Requirement

- i. Elderly persons age 62 and older are exempt from AHA's Work Requirement.
- ii. Persons with Disabilities are also exempt from AHA's Work Requirement. . The definition of a "person with disabilities" in this context is consistent with HUD's definition of a "person with disabilities" for program eligibility purposes, and is set forth at Part II, Article Four, Section 1, Paragraph F.

2. Applicant would be a suitable Resident based on past satisfactory behavior including, but not limited to, housekeeping performance, acceptable payment records for rent and/or utilities (as applicable), acceptable credit history, acceptable criminal background record, and a commitment to abide by the Dwelling Lease offered to eligible Applicants (the "Lease").
3. A Resident of an Assisted Apartment must continue to demonstrate compliance with all eligibility and suitability requirements for admission and continued program participation, all Lease requirements, apartment rules and other program requirements throughout the Resident's tenancy.
4. All Applicants and Residents must certify at application, and Residents must certify at recertification, that they have the ability to comply with all requirements of the Lease., including, but not limited to, those which require the ability to exit the building in the event of an emergency and such other related certifications as deemed appropriate by Atlanta Housing Authority, without Atlanta Housing Authority having to provide services beyond those stated in the Lease. This responsibility applies to all Applicants and Residents, including those Applicants and Residents who may have physical or mental impairments that otherwise cannot be addressed by reasonable accommodations.

ARTICLE THREE. INITIAL LEASING CONSIDERATIONS

1. An Applicant desiring to lease an Assisted Apartment must apply at the community or communities of the Applicant's choice according to the Management Operating Procedures.
2. An Applicant who applies will be placed on the applicable site-based waiting list for the community or communities in accordance with the Applicant Selection Policies.
3. Certain communities with Assisted Apartments may require Applicants to pay an appropriate non-refundable leasing fee, which may be applied to the Applicant's security deposit, provided the Applicant is offered and accepts the offer of an Assisted Apartment.
4. Applicants must provide all information on all household members requested in the application for admission on the form in use by the Management Agent.
5. The application for admission will give persons with disabilities the opportunity to (i) specify whether they need a unit with accessible features and describe the necessary accessibility features they require; (ii) specify if they require reasonable accommodation(s) in their housing and/or during the application process; and (iii) request a copy of Atlanta Housing Authority's Reasonable Accommodation Policy.
6. Application information available to Applicants will include the name and contact information of the Management Agent for each community, and the name and contact information of Atlanta Housing Authority's Section 504/ADA

Coordinator, including the TDD/TTY number or Georgia Relay Service telephone number.

ARTICLE FOUR. APPLICANT SELECTION POLICIES

Applicants for Assisted Apartments, whether located in Affordable Communities or Signature Communities, will be placed on the applicable site-based waiting list in accordance with the requirements as set forth in this Article Four.

1. Order of Applicant Selection for Communities where the Resident Population is comprised of Elderly, Almost-Elderly and/or Non-Elderly Disabled Residents:

A. To be considered for a Community for Elderly, Almost-Elderly and/or Non-Elderly Disabled Residents, an Applicant must be a household whose head or spouse (if married) or sole member is:

iii. Elderly (62 years of age or older);

iv. Almost Elderly (55-61 years of age); or

v. Non-Elderly Disabled (persons less than 62 years of age with a disability, and for the purpose of admission policy under the following subsection B., persons less than 55 years of age).

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

B. Atlanta Housing Authority pursuant to its MTW Annual Plan will strive to achieve an optimal balance of Elderly, Almost Elderly, and Non-Elderly Disabled Residents in senior communities that do not have a designation pursuant to paragraph C of this Section. The Management Agents of such communities shall be permitted to admit applicants from the waiting list at a ratio of four (4) Elderly and Almost Elderly Applicants to one (1) Non-Elderly Disabled Applicant in order to achieve the optimal balance.

C. Atlanta Housing Authority in accordance with its Moving to Work Annual Plan may designate up to 100% of the Assisted Apartments in a community for Elderly, Almost Elderly, or Non-Elderly Disabled Residents, as applicable and appropriate.

D. In the event there is an insufficient number of Elderly and Almost Elderly Applicants to admit to Assisted Apartments pursuant to paragraphs B and C above, Atlanta Housing Authority may, in its sole discretion, exercise its authority to permit Elderly and/or Almost Elderly Applicants on the Housing Choice Program waiting list to be selected for screening and admission, if approved, to a senior community with Assisted Apartments.

E. To the extent that either a current Resident or eligible Applicant requires the accessibility features of an available Uniform Federal Accessibility Standards Unit ("UFAS-Accessible Unit"), the requirements in Article Five of this Part II will take precedence in the order of selection.

F. Disability Definitions for Program Eligibility Determinations

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

- A. A disabled person is one with an inability to engage in any substantial gainful activity because of any medically determinable physical or mental impairment that is expected to result in death or has lasted or can be expected to last continuously for at least 12 months; or for a blind person at least 55 years old, inability because of blindness to engage in any substantial gainful activities comparable to those in which the person was previously engaged with some regularity and over a substantial period.
- B. A developmentally disabled person is one with a severe chronic disability that:
 - a. is attributed to a mental and/or physical impairment;
 - b. has manifested before age 22;
 - c. is likely to continue indefinitely;
 - d. results in substantial functional limitations in three or more of the following areas: capacity for independent living, self-care, receptive and expressive language; learning, mobility, self-direction, and economic self-sufficiency AND
 - e. requires special interdisciplinary or generic care treatment, or other services which are of extended or lifelong duration and are individually planned or coordinated.
- C. A disabled person is also one who has a physical, emotional or mental impairment that:
 - a. is expected to be of long-continued or indefinite duration;
 - b. substantially impedes the person’s ability to live independently;
 - c. is such that the person’s ability to live independently could be improved by more suitable housing conditions.
- iv. A person whose disability is based solely on any drug or alcohol dependence is not to be considered a person with disabilities for program eligibility purposes.
- v. Atlanta Housing Authority and its Management Agents apply these definitions when determining who qualifies as “Disabled” for admission to Communities where the Resident Population is comprised of Elderly, Almost-Elderly and/or Non-Elderly Disabled Residents, as described in this Article Four, Section 1.
- G. Applicant households must satisfy the Determining Criteria of Article Two above, including but not limited to the Work Requirement. Elderly persons age 62 and older are exempt from the Work Requirement. Persons with disabilities are also exempt from the Work Requirement if they satisfy the applicable definition of a “person with disabilities”. The definition of a

“person with disabilities” in this context is consistent with HUD’s definition of a “person with disabilities” for program eligibility purposes, and is set forth at Part II, Article Four, Section 1, Paragraph F.

2. Order of Applicant Selection for a Community.

- A. The order of selection of an Applicant from a site-based waiting list in a community with Assisted Apartments will be according to the ranking of the Applicant’s application by either date-and-time of application or lottery, as applicable. To the extent that either a current Resident or eligible Applicant requires the accessibility features of an available Uniform Federal Accessibility Standards Unit (“UFAS-Accessible Unit”), the requirements in Article Five of this Part II will take precedence in the order of selection.
- B. Applicant households must satisfy the Determining Criteria of Article Two above, including but not limited to the Work Requirement. Elderly persons age 62 and older are exempt from the Work Requirement. Disabled persons (or persons with disabilities) are also exempt from the Work Requirement if they satisfy the applicable definition of a “person with disabilities.” The definition of a “person with disabilities” in this context is consistent with HUD’s definition of a “person with disabilities” for program eligibility purposes, and is set forth at Part II, Article Four, Section 1, Paragraph F.

3. General Considerations for Applicant Selection from a Site-Based Waiting List.

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

- v. Fair Housing Logo or statement; and
 - vi. Accessibility Logo or statement.
- D. If the public notice does not include the closing date of the site-base waiting list then a separate public notice must be published to announce the closing date of the site-based waiting list.
- E. The Management Agent will ensure that the opening and/or closing of a site-based waiting list will be published in selected newspapers of general public circulation, including minority and foreign language newspapers (for persons with LEP) that may be available to potential Applicants in order to ensure fair and equitable marketing efforts. The selection of such newspapers will be in accordance with the Management Operating Procedures and/or Affirmative Fair Housing Marketing Plan, as applicable.
- F. The method used in ranking Applicants on the site-based waiting list for an Assisted Apartment determines the organization of applicants on the site-based waiting list. Applicants ranked by date-and-time of application will be organized according to bedroom size eligibility whereby the application with the earliest date-and-time will be first. Applicants ranked by lottery will be organized according to bedroom size eligibility in sequential numerical order, first to last, of the random selection. In the case of the reoccupancy of a revitalized community, eligible returning residents of the former public housing project will be placed on the applicable site-based waiting list and given first consideration as Applicants for an Assisted Apartment prior to any consideration given to other Applicants who were placed on the applicable site-based waiting list according to a public notice.
- G. The maintenance of a site-based waiting list with respect to updating applications, notice letters, and purges will be detailed in the Management Operating Procedures.
4. General Consideration for Mixed-Income, Mixed-Finance Communities
- A. At least five percent (5%) of all Assisted Apartments in Mixed-Income, Mixed-Finance Communities will be available to eligible and qualified Applicants and Residents with disabilities who require the accessibility features of UFAS-Accessible Units, provided the Assisted Apartment unit count remains within the limits established by the governing legal and financial agreements should the percentage exceed five (5%).
- B. While still subject to the requirements of the Low Income Housing Tax Credit program under Section 42 of the federal Internal Revenue Code, and in consideration of the expected income levels of residents of apartments other than Assisted Apartments being contemplated by Owner Entities of Mixed-Income, Mixed-Finance communities with Assisted Apartments, such Owner Entities are hereby permitted to manage admissions to an appropriate goal of a broad range of incomes

whereby fifty percent (50%) of Assisted Apartments would be occupied by Resident families with incomes less than thirty percent (30%) of area Median Income for the Atlanta, Georgia MSA (adjusted for family size) and fifty percent (50%) by Resident families with incomes equal to or greater than thirty percent (30%) Median Income for the Atlanta, Georgia MSA (adjusted for family size).

ARTICLE FIVE.

ORDER OF SELECTION FOR UFAS-ACCESSIBLE UNITS

1. Atlanta Housing Authority identifies and prioritizes the needs of eligible Residents and Applicants who require the accessibility features of a UFAS-Accessible Unit in a centralized database according to the date and time of a Resident's transfer request, or the date and time or ranking by lottery, as applicable, of an Applicant's application. This database ("UFAS-Accessible Unit Database") maintains data on such Residents and Applicants for both the Affordable Communities and Signature Communities.
2. Each Affordable Community and each Signature Community will maintain a separate, site-based UFAS-Accessible Unit Waiting List ("UFAS Waiting List") for eligible Applicants and Residents with disabilities that require UFAS-Accessible Units.
3. The UFAS-Accessible Unit Database is established to provide:
 - A. Direct assistance to Residents and Applicants with disabilities, upon request, in the application for an available UFAS-Accessible Unit in any Affordable Community or Signature Community;
 - B. A process for notifying and referring residents from the database to the Affordable Communities and Signature Communities with openings on the respective site-based UFAS Waiting Lists;
 - C. A process for notifying and referring Applicants from the database to the Affordable Communities and Signature Communities with openings on the respective site-based UFAS Waiting Lists; and
 - D. A method for monitoring the maximization of occupancy of Assisted Apartments that are UFAS-Accessible Units, in Affordable Communities and Signature Communities, by Residents who require the accessibility features of those units.
4. When a UFAS-Accessible Unit becomes available in the appropriate bedroom size in an Affordable Community, the Management Agent shall offer the UFAS-Accessible Unit as follows:
 - A. First, to a current Resident with disabilities in an Affordable Community who is being relocated due to Atlanta Housing Authority revitalization activities and who requires the accessibility features of the available UFAS-Accessible Unit;

- B. Second, to a current Resident with disabilities in the same Affordable Community who requires the accessibility features of the available UFAS-Accessible Unit and is occupying a unit without those features;
 - C. Third, if there is no current Resident in the same Affordable Community who requires the accessibility features of the available UFAS-Accessible Unit and wishes to reside in that unit, then it will be offered to an eligible, qualified current Resident with disabilities, according to date and time of transfer request, residing in another Affordable Community, who requires the accessibility features of the available, UFAS-Accessible Unit and is occupying a unit without these features;
 - D. Fourth, if there is no current Resident in any Affordable Community who requires the accessibility features of the vacant, UFAS-Accessible Unit and wishes to reside in that unit, then it will be offered to an eligible, qualified current Applicant with disabilities, according to date and time of application on the site-based waiting list of the same Affordable Community who requires the accessibility features of the available UFAS-Accessible Unit;
 - E. Fifth, if there is no qualified Applicant on the site-based waiting list of the same Affordable Community who requires the accessibility features of the vacant, UFAS-Accessible Unit, then it will be offered to an eligible, qualified Applicant with disabilities, according to date and time of application, on the site-based waiting list of another Affordable Community who requires the accessibility features of the available, UFAS-Accessible Unit; and
 - F. Sixth, if there is not an eligible, qualified Resident or Applicant with disabilities in the Affordable Communities who wishes to reside in the available, UFAS-Accessible Unit, then the unit may be offered to the next Applicant or Resident, according to the date and time of the transfer request or application, in the Affordable Community who does not need the accessibility features of the unit. The occupying Resident will sign a lease or lease addendum that requires the Resident of any UFAS-Accessible Unit in an Affordable Community who does not need the accessibility features of that unit to relocate, at no expense to the Resident, to a vacant, non-accessible unit within thirty (30) days of notice by the Affordable Community when there is an eligible, qualified current Applicant or Resident with disabilities who requires the accessibility features of the unit.
5. When an Assisted Apartment that is a UFAS-Accessible Unit becomes available in the appropriate bedroom size in a Signature Community, the Management Agent shall offer the UFAS-Accessible Unit to Residents and/or Applicants, as follows:
- A. First, to a current Resident with disabilities in the same Signature Community who requires the accessibility features of the available, UFAS-Accessible unit and is occupying a unit without those features;

- B. Second, if there is no current Resident in the same Signature Community who requires the accessibility features of the vacant, UFAS-Accessible Unit and wishes to reside in that unit, then it will be offered to an eligible, qualified current Applicant for an Assisted Apartment, according to date and time of application, on the site-based waiting list of the same Signature Community who requires the accessibility features of the available, UFAS-Accessible Unit;
- C. Third, if there is no qualified Applicant for an Assisted Apartment on the site-based waiting list of the same Signature Community who requires the accessibility features of the vacant UFAS-Accessible Unit, then the Signature Community will coordinate with Atlanta Housing Authority's Section 504/ADA Coordinator for referrals from the Affordable and Signature UFAS-Accessible Unit Database. If Atlanta Housing Authority identifies a current Resident or Applicant on the Affordable and Signature UFAS-Accessible Unit Database, Atlanta Housing Authority shall refer the Resident or Applicant, according to date and time of transfer request or application, to the Signature Community; and
- D. Fourth, if there is no eligible, qualified Resident or Applicant with disabilities in the Signature Community or referred by Atlanta Housing Authority pursuant to a review of the Affordable and Signature UFAS-Accessible Unit Database, who wishes to reside in the available, UFAS-Accessible Unit, then the unit may be offered to the next Applicant or Resident, according to date and time of transfer request or application, in the Signature Community who does not need the accessibility features of the unit. The occupying Resident will sign a lease or lease addendum that requires the Resident of any UFAS-Accessible Unit in a Signature Community who does not need the accessibility features of that unit to relocate, at no expense to the Resident, to a vacant, non-accessible unit within thirty (30) days of notice by the Signature Community when there is an eligible, qualified current Applicant or Resident with disabilities who requires the accessibility features of the unit.

ARTICLE SIX.

SCREENING OF APPLICANTS AND RESIDENTS

- 1. Applicants and Residents, at least 16 years of age or older, are subject to initial and ongoing screening to ensure that they can demonstrate their current and continued suitability as a Resident of a community with Assisted Apartments. The Management Agent shall be responsible for: (1) screening household members 16 years old and over; and (2) ensuring that all background information, including deductions and allowances, are properly verified.
- 2. Applicants shall undergo and complete the screening process prior to the offer of an Assisted Apartment. Residents shall undergo and complete the screening process annually, on an interim basis, or over some longer interval of time in accordance with the MTW Annual Plan.
- 3. Screening practices that are common and customary for the purpose of leasing apartments in the State of Georgia shall be utilized including, but not limited to examination of landlord and dispossession records; review of past and current

apartment management records; review of housekeeping performance based on a home visit; and requesting credit reports, utility records, and criminal background histories.

4. Applicants and Residents are required to execute authorization forms allowing Atlanta Housing Authority, Owner Entities and/or their respective Management Agents to conduct any background check, examination, or verification required for appropriate determinations under the initial or periodic reexamination process. The period of the authorization will be established in the Management Operating Procedures.
5. Applicants and Residents are required to cooperate with the Management Agent during the screening process by providing truthful, complete information relating to all income, household composition, criminal history background, and all other household background information.
6. An Applicant with an unsatisfactory screening report will be denied and sent a suitability denial notice. A Resident household with an unsatisfactory screening report will be subject to termination or nonrenewal of the Resident household's Lease.
7. Applicants and Residents with unsatisfactory screening reports will be presented with notice of denial, termination or non-renewal, as applicable, which will include a copy of any adverse report(s) or reason(s), and the opportunity to dispute the accuracy and relevance of the adverse report(s) or reason(s). Applicants and Residents desiring to dispute such determinations, including those with adverse criminal history reports, may do so as set forth in the Statement of Policies, as applicable, based on the circumstances.
8. Atlanta Housing Authority, Owner Entities and Management Agents may share information with one another on the denial of admission of Applicants and the termination of Residents in order to avoid any duplication of effort and ensure the integrity of the screening process.

ARTICLE SEVEN. CRIMINAL HISTORY SCREENING

Atlanta Housing Authority, Owner Entities, and/or Management Agents may deny admission to Applicants or terminate or not renew the leases of Residents if any of their household members are or have been engaged in criminal activity that could reasonably be expected to indicate a threat to the health, safety or welfare of other residents, Atlanta Housing Authority, Owner Entity, and/or Management Agent staff.

1. OFFENSES SPECIFICALLY IDENTIFIED BY HUD
 - A. Pursuant to 24 CFR § 960.204, Applicants may be denied admission if any member of their households:
 - i. Has been evicted from federally assisted housing for drug-related criminal activity within the three year period preceding application;

- ii. Is currently engaging in the illegal use of drugs;
 - iii. Has ever been convicted of drug-related criminal activity for manufacture or production of methamphetamine on the premises of federally assisted housing;
 - iv. Is subject to a lifetime registration requirement under a State sex offender registration program; or
 - v. Is abusing or demonstrates a pattern of abuse of alcohol that may threaten the health, safety, or right to peaceful enjoyment of the premises by other residents.
- B. Residents will also be subject to termination or non-renewal of tenancy if, subsequent to admission, Atlanta Housing Authority determines that any of the statements included in Paragraph A above were applicable to Resident households at the time of admission.

2. VIOLENT OR DRUG-RELATED OFFENSES

Applicants may be denied admission and Residents may be subject to termination or non-renewal of tenancy if any member of their households have been convicted of, arrested or under an outstanding warrant for, or reasonably believed to be engaged in any Violent or Drug-Related Offenses. Examples of Violent or Drug-Related Offenses include, but are not limited to, the following:

- A. Homicide, Murder, Voluntary Manslaughter;
- B. Rape, Sexual Battery, other Aggravated Sex-Related Crimes;
- C. Child Molestation, Child Sexual Exploitation;
- D. Drug Charges;
- E. Kidnapping, False Imprisonment;
- F. Terrorism;
- G. Arson;
- H. Possessing, Transporting or Receiving Explosives or Destructive Devices with the Intent to Kill, Injure, Intimidate or Destroy;
- I. Assault and Battery (Simple and Aggravated);
- J. Trafficking, Distribution, Manufacture, Sale, Use, or Possession of Illegal Firearms;
- K. "Carjacking;"
- L. Robbery;

- M. Hate Crimes;
- N. Criminal Damage to Property Endangering Life, Health and Safety;
- O. Aiding and Abetting in the Commission of a Crime Involving Violence; and
- P. Other Violent or Drug-Related Offenses that may Pose a Threat to Public Health and Safety.

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

Applicants may be denied admission if any member of their households have, within the five year period preceding application, been convicted of, arrested or under an outstanding warrant for, or reasonably believed to be engaged in any other criminal offenses that do not involve violence or drugs. Residents may be subject to termination or non-renewal of tenancy if any member of their households is convicted of, arrested or under an outstanding warrant for, or reasonably believed to be engaged in any other criminal offenses that do not involve violence or drugs. Examples of Other Criminal Offenses (not violent or drug-related) include, but are not limited to the following:

- A. Child Neglect;
- B. Disorderly Conduct;
- C. Abuse or Pattern of Abuse of Alcohol (to the extent such abuse poses a threat to the health, safety, or peaceful enjoyment of the premises by other residents);
- D. Motor Vehicle Theft;
- E. Burglary, Larceny, Receiving Stolen Goods;
- F. Prostitution and Solicitation of Prostitution;
- G. Vandalism; and
- H. Other Offenses that may Pose a Threat to Public Health and Safety but do not involve Violence or Drugs.

4. ADVERSE CRIMINAL HISTORY DECISIONS

- A. NOTICE: Denied Applicants and Residents for whom termination is proposed will receive a written notice outlining:
 - i. The specific reasons for the denial or proposed termination;
 - ii. The dispute process; and
 - iii. The opportunity for requesting reasonable accommodation in the dispute process for persons with disabilities.

B. Dispute Process Available to *Applicants Denied for Criminal History*

- i. **INFORMAL REVIEW:** Denied Applicants have the right to request an informal review by an impartial person designated by the Management Agent who did not have any prior role in processing the Applicant's application and who is not the subordinate of the person who made the initial decision. Informal reviews must be requested in writing within ten (10) days from the date of receipt of the denial notice. If the Applicant requires assistance with making a written request, the Applicant may come into the management office before the end of the ten (10) day period to request assistance with the written request. If the Applicant does not submit a written request for an informal review within this time period, the decision will be considered final.
- ii. **DOCUMENT REVIEW:** Prior to the informal review, a denied Applicant may request an opportunity to examine the application file and to copy any relevant documents at the Applicant's cost.
- iii. **WITNESSES AND REPRESENTATIVES:** The Applicant may bring witnesses, representatives (including attorneys) or letters of support to the informal review. In the event the Management Agent presents any witnesses, the Applicant will have a right to cross-examine them.
- iv. **DISPOSITIONS:** Denied Applicants are encouraged to bring to the informal review a copy of the disposition of the criminal offenses which form the basis of the denial. If, however, a denied Applicant admits that he or she committed a crime, was convicted of a crime or that he or she entered a guilty plea for the criminal offense in question, the Applicant will not be required to provide additional information regarding a criminal conviction or a guilty plea. This does not mean, however, that an Applicant who admits to committing a crime, was convicted of a crime or entered a guilty plea will not be allowed to discuss the circumstances or any of the review considerations set forth below if he or she wants the Management Agent to consider such additional information.
- v. **REVIEW CONSIDERATIONS:** At the informal review, a denied Applicant may present, and Management Agent will consider, evidence (including verbal and written statements) of the following:
 - a. **Circumstances:** Circumstances of the criminal case(s) and mitigating or aggravating circumstances;
 - b. **Conduct:** The time, nature and extent of the Applicant's conduct (including the severity of the conduct and the seriousness of the offense);
 - c. **Future Danger:** Whether the conduct indicates that the Applicant would pose a danger to the health, safety or welfare of other residents; whether the Applicant has been rehabilitated so as not to pose such a danger; and other facts which would prevent the Applicant from posing a danger.

- vi. REVIEW DECISIONS: A written review decision should be provided to the denied Applicant within ten (10) days following the informal review or, if the reviewer requested additional information from the Applicant, within ten (10) days following the date the information was submitted, or was due if not submitted, whichever comes first. If the reviewer's decision is to deny the application, the decision shall set forth the reasons for the denial in detail.
- C. Residents subject to Lease termination who desire to dispute the accuracy and relevance of the criminal history information may do so as set forth in Part III, Article Seven: "Disputing Decisions of Manager."
- D. Applicants who desire to dispute decisions to deny their applications *for reasons other than criminal history* may do so as set forth in Part III, Article Seven: "Disputing Decisions of Manager."

PART III - RESIDENT BENEFITS AND OPPORTUNITIES

ARTICLE ONE. RENT, INDIVIDUAL DEVELOPMENT ACCOUNTS, AND SECURITY DEPOSITS

1. Residents are required to pay rent according to the instructions provided by the Management Agent pursuant to the terms of the Lease.
2. Atlanta Housing Authority may, from time to time, establish various rent structures that will combine the rent charged to Residents with the budgeted federal subsidy in order to balance affordability and operating expenses to ensure that the financial obligations of each community with Assisted Apartments are covered.
3. Rent structures will be evaluated on a property-by-property basis with the goal of using the rent structure that best positions the individual community to remain self-sustaining. The appropriate rent structure for each community with Assisted Apartments may be established by using one or a combination of the following income and non-income based approaches:
 - A. "Income Adjusted Rent" which is a rent structure based on a percentage of the Resident's adjusted household income; and/or
 - B. "Affordable Fixed Rent" which is a rent structure based on several property-related factors, including, but not limited to, the particular community in question, location, unit size, operating costs and other expenses, demand for the community, community demographics, and the amenity package.
4. When the Income Adjusted Rent and the Affordable Fixed Rent are available in the Resident's community, the amount of a Resident's rent will be based on whether a Resident selects either the "Income Adjusted Rent," or an "Affordable Fixed Rent."

5. When the Income Adjusted Rent and the Affordable Fixed Rent are available in the Resident's community, a Resident will be subject to a "Rent Adjustment Fee" if the Resident changes the method of rent payment during the calendar year, unless the Resident can document a hardship reason as to why the change is necessary.
6. Affordable Fixed Rents may be the only rent structure offered in certain communities identified under Atlanta Housing Authority's Annual MTW Plan. Income-adjusted Rents will not be available in those communities. All Residents residing in these communities will have to pay the applicable Affordable Fixed Rent for Assisted Apartments in accordance with the schedule established for their community.
7. Atlanta Housing Authority, in its discretion, may explore innovative rent simplification strategies and methodologies for determining Rent that are beneficial to Residents, while streamlining administrative processes and procedures for Atlanta Housing Authority, Management Agents and Residents ("Rent Simplification"). Prior to the implementation of any proposed Rent Simplification strategy or methodology, AHA will conduct an impact analysis to determine whether the implementation of any change in determining Rent will produce an unreasonable rent burden on Residents ("Rent Burden Impact Analysis"). The Rent Burden Analysis supporting any proposed Rent Simplification strategy or methodology must be submitted to and approved by the Atlanta Housing Authority Board of Commissioners before implementation.
8. Atlanta Housing Authority, in its discretion, may establish fixed-rate or standard deductions and asset determination procedures to be used in calculating Income-Adjusted Rents. Standard income deductions would replace the calculation of income deductions based on actual expenses. Asset determinations would examine the nature and value of the asset in establishing procedures for setting a schedule of assets that would or would not be used in calculating Income-Adjusted Rents. The President and Chief Executive Officer, as approved by the Atlanta Housing Authority Board of Commissioners, is authorized to approve revisions to the schedule of Standard Income Deductions and revisions to the treatment of assets. If it is determined that the implementation of any such revision could impact Tenant Rent, a Rent Burden Impact Analysis and Board of Commissioners approval will be required.
9. Resident, or any Resident household member who becomes unemployed due to her/his resignation, retirement, quitting, termination, firing or other reasons after the execution of the Lease for an Assisted Apartment and during the Resident's ongoing term of tenancy in an Assisted Apartment, shall not receive any rent relief as a result of the loss of employment and shall continue to pay the Income Adjusted Rent or Affordable Fixed Rent based on prior employment and income status, as applicable, for the Resident in the Assisted Apartment. Residents who provide third party verification satisfactory to the Management Agent that loss of employment was due solely to a layoff will receive consideration for a reduction in rent. .
10. Residents paying an Income Adjusted Rent must pay a minimum rent of \$125, or such lesser or greater amount as Atlanta Housing Authority may set from time to time.

11. The minimum rent requirement does not apply to Resident households, in which all adult household members are either elderly and/or disabled, and whose sole source of income is Social Security, SSI, or other fixed annuity pension or retirement plans. Such Resident households will still be required to pay the Income Adjusted Rent or Affordable Fixed Rent, as applicable. The definition of “disabled” in this context is consistent with HUD’s definition of a “person with disabilities” for program eligibility purposes, and is set forth at Part II, Article Four, Section 1, Paragraph F.
12. AHA, in determining annual household income, will disregard the employment income of an Elderly Person or Non-Elderly Disabled Person whose sole source of income is Social Security, SSI, and/or other similar fixed income received from a verified plan (Annual Fixed Income), provided the employment income does not result in the discontinuance of the Elderly Person’s or Non-Elderly Disabled Person’s sole source of Annual Fixed Income. The definition of “disabled” in this context is consistent with HUD’s definition of a “person with disabilities” for program eligibility purposes, and is set forth at Part II, Article Four, Section 1, Paragraph F. This policy is applicable to all AHA housing assistance programs and serves as the replacement for any applicable HUD rules and regulations. AHA, in its discretion, may establish reasonable verification procedures and documentation requirements to ensure program integrity.
13. Such Elderly and Non-Elderly Disabled Residents will still be expected to pay the Income Adjusted Rent based on the Annual Fixed Income and any adjustments to the Annual Fixed Income.
14. Security deposits shall be maintained at such levels as Atlanta Housing Authority, Owner Entities, and/or Management Agents may determine based on the bedroom size and the particular community with Assisted Apartments.
15. Generally, Atlanta Housing Authority does not expect that the establishment of a new minimum rent or other rent structure described in paragraph 3 of this Article will create a hardship since no such rent initiatives will go into effect without providing at least sixty (60) days advance notice. Even so, a household who has previously paid one or more months of rent but is unable to pay the minimum rent, due to extraordinary financial distress, may request hardship consideration.
 - A. A hardship may exist for a Resident household when any one of the following circumstances is present: (i) the household is no longer eligible for (through no fault of the household) or is waiting for an eligibility determination for a Federal, State, or local assistance program; (ii) the income of the household has decreased because of extraordinary changed circumstances, including loss of employment due to layoff; (iii) although the household is diligently seeking to increase the household’s income, the increase is not yet sufficient to fully pay the new rent; or (iv) such other extraordinary circumstances as the Management Agent may determine.
 - B. The Management Agent shall promptly investigate any request for hardship and take appropriate actions based on whether a hardship is established and the Resident household is otherwise complying with its obligations

under an approved economic independence program and the planning documents formulated for the household.

- C. Such actions under paragraph B above may include, but not be limited to:
 - i. Temporary suspension of the minimum rent requirement under such terms as the Management Agent shall direct. Such suspensions shall not last greater than ninety (90) days unless otherwise extended upon the written request of the Resident household based on verifiable circumstances reasonably affecting the Resident household's ability to pay the minimum rent. The period of the temporary suspension may be extended by the Management Agent after supervisory review and documented approval of the request;
 - ii. Accelerated enrollment in one of Atlanta Housing Authority's approved economic independence program components;
 - iii. Referral to third party agencies who assist residents with the payment of rent; and
 - iv. Such other actions as the Management Agent shall direct.
- D. The Resident household will not be required to pay minimum rent arrearages that accumulated during the entire period of an approved temporary suspension of the minimum rent as set forth in paragraph C above.
- 16. Atlanta Housing Authority, in its discretion, may explore strategies that recognize the progression of Residents toward economic self-sufficiency which lead to their graduation from housing assistance. Such strategies may only be incorporated in the Management Operating Procedures upon approval by the President and Chief Executive Officer.

ARTICLE TWO.

BASIC LEASE OBLIGATIONS AND RESPONSIBILITIES

1. Residents are to live in the apartment in such a manner so as to not adversely impact the quiet, peaceful enjoyment of the premises by other residents while meeting all of the obligations set forth in the Lease, including, but not limited to, those obligations relating to the work requirement, housekeeping, other health and safety concerns, criminal activity prohibitions, reporting criminal activity on the premises, and economic independence initiatives.
2. Each Resident household must undergo a "Lease Renewal Review" or recertification process in a manner and at a frequency determined by the Management Agent based on the particular community in which the Resident resides. Lease Renewal Reviews may be conducted annually, on an interim basis, or over some longer interval of time according to the Moving to Work Annual Plan and as established in the Management Operating Procedures.
3. All household members, 16 years of age or older, are required to execute authorization forms allowing the Management Agent to conduct any

background check, examination, or verification required for appropriate determinations under the initial or periodic recertification process in order to ensure Residents meet all criteria for continued occupancy. The period of the authorization will be established in the Management Operating Procedures.

4. Each adult Resident (18 to 61 years of age) is required to comply with Atlanta Housing Authority's work requirement, unless he or she qualifies for exemption. The work requirement and the qualifications for exemption are set forth above at Part Two, Article Two, Section 1.
5. Resident households that are not compliant with the applicable Lease, including the community's apartment rules and Atlanta Housing Authority's work requirement, are subject to Lease termination.
6. The Management Agent shall approve, in its sole discretion subject to verification, any combination of full-time or part-time gainful employment and full-time or part-time attendance at an Atlanta Housing Authority-recognized school, institution, and/or Atlanta Housing Authority-approved training program, provided that, when combined, total a minimum number of 30 hours equivalent to the full-time employment required in accordance with eligibility and qualification requirements of this Statement of Policies
7. Any Resident who loses, quits, leaves, resigns, retires from or is terminated or fired from his or her job or welfare benefit shall continue to pay the Rent based on the Resident's prior employment income or welfare benefit status. Residents who provide third party verification satisfactory to the Management Agent that loss of employment or welfare benefit was due solely to a layoff or other independent action, as applicable, will receive consideration for a reduction in Rent based on a resulting change in income due to the layoff or loss of benefit.
8. Any Resident who is not working full-time shall be required to enroll and satisfactorily participate in an established and Atlanta Housing Authority-approved economic independence program, and if such economic independence program is not a full-time program, Resident shall be required to have part-time employment.
9. Each Resident, regardless of the Resident's work status (full or part-time employment), may be required to participate in an approved economic and life-style initiative that has as one of its components, the completion of an approved planning document, which charts out a path for the Resident towards economic, and life-style independence and devises strategies to address any barriers confronting the Resident.
10. HUD established the Community Service and Self-Sufficiency Requirement (CSSR) which requires most unemployed public housing residents ages 18 - 61, who are not receiving TANF benefits, exempt from work requirements, engaged in work activities or unable to comply because of a disability, to contribute the HUD-specified number of hours each month to community service or an economic self-sufficiency program. Residents in compliance with Atlanta Housing Authority's full-time employment requirement of 30 hours per week, or a combination of training/schooling *and* work hours of 30 hours per week, are considered by Atlanta Housing Authority to be in compliance with CSSR.

11. Each Resident is responsible for ensuring that any school age member of the Resident household who is under 18 years of age attends school on a regular basis in accordance with local school board policies and state law. Upon the request of the Management Agent, Resident must provide the Management Agent with such information, releases and authority to verify compliance and the attendance status of any such school age member of the household on the Lease.
12. If it is determined that any school age member of the Resident household who is under 18 years of age is not attending school on a regular basis or who has not completed her/his secondary education, such school age member will be required to attend school on a regular basis or enroll or reenroll, as applicable in and attend an accredited public or private secondary academic or technical school. The Resident must provide to the Management Agent such information, releases and authority to verify compliance and the attendance status of any such school age member of the household on the Lease.
13. Each Resident Head of Household and Resident household member shall be responsible for the actions and activities of household members, visitors, guests, and invitees while those persons are either a member of the household, visiting the household, or are on the property.
14. Residents who fail to fulfill the obligations and responsibilities under the provisions of this Part III, Article Two, or under the provisions of the Lease shall be subject to the termination of or significant reduction in rental subsidy resulting in an increase in the amount of Rent, or the nonrenewal or termination of their Lease.

ARTICLE THREE. OCCUPANCY, CHARGES AND ALLOWANCES

1. To avoid overcrowding and the conditions that may arise from overcrowding, Residents will be assigned to an apartment so that generally no more than two adults occupy a bedroom. Additional consideration, as determined by the Management Agent, may be given to households with small children or households with other significant circumstances who may be requesting a larger apartment.
2. A Live-in Aide that is essential for the care and support of an Elderly or Disabled Resident, the need for which having been certified by a medical professional, may reside in the Assisted Apartment with the Elderly or Disabled Resident. In that Atlanta Housing Authority, the Owner Entities and their respective Management Agents have the sole authority to approve a Live-in Aide, a Live-in Aide must demonstrate her/his suitability to reside in the apartment prior to occupancy, and continue to demonstrate her/his suitability and status as a Live-in Aide for as long as the Live-in Aide resides in the Assisted Apartment. Live-in Aides must consent to screening requirements of Atlanta Housing Authority, the Owner Entities and their respective Management Agents, as applicable, including, without limitation, criminal background screening and a review of past participation in an Atlanta Housing Authority program or residence in the Assisted Apartment community or

another community owned by Atlanta Housing Authority, the Owner Entity or a community managed by the Management Agent. Live-in Aides must vacate the Assisted Apartment if the Elderly or Disabled person they are assisting ceases to qualify for a Live-in Aide, ceases to qualify for an Assisted Unit, or vacates the premises, which in any case shall result in the Live-in Aide having absolutely no right to continue to reside in the Assisted Unit or to receive rental assistance or to remain on the premises. Further, Atlanta Housing Authority, the Owner Entity or Management Agent reserve the right, in each's respective sole discretion, to require a Live-in Aide, who is not a member of the Resident household and therefore not afforded the protections of the Lease, to vacate the Assisted Apartment if he or she is no longer performing as a Live-in Aide in the Assisted Apartment or exhibits such other behavior that is deemed disruptive to the community and/or its Residents. .

3. Atlanta Housing Authority or the Owner Entity (with the approval of Atlanta Housing Authority) may establish utility allowances by bedroom size for each community based on the reasonable rate of actual utility consumption by energy conservative households; and may, after considering the existing condition of a community, including the age of building infrastructures, amount of insulation, and air circulation, adjust such allowances to account for the actual utility consumption required to maintain a reasonable quality of life environment under such conditions.
4. Atlanta Housing Authority, in its discretion, may charge Residents for excess utility usage that exceeds the utility allowances established for the Affordable Community.
5. The Management Agent may establish and, if approved by Atlanta Housing Authority or the Owner Entity, publish for each community with Assisted Apartments a schedule of reasonable fees and charges, including but not limited to Maintenance Charges, Transfer Fees, Application Fees, Damage Fees, Supplemental Screening Fees, Pet Deposits, Pet Application Fees, and Dispossessory Fees which may be charged to residents in addition to rent and excess utility charges, as applicable.

ARTICLE FOUR. TRANSFERS

1. Residents may request a transfer to another Assisted Apartment within the same community with Assisted Apartments subject to approval by the Management Agent ("Community Transfer"). A request to move to another community is not considered a Community Transfer. Residents cannot initiate a transfer to another community. Residents must submit an application to the other community and, if approved, provide the appropriate notice under the current Lease, except as provided for in Section 6 of this Article Four.
2. Residents who have requested a Community Transfer must be current in all obligations under the Lease including, but not limited to having no outstanding charges for rent or other charges; no chronic rent delinquency (more than one late payment in a four month period); and no insufficient fund charges for the preceding six months.

3. A Resident's request for a Community Transfer shall not be approved if the Resident has resided in the current apartment for less than one year, except in those cases where there are verifiable medical reasons or a verifiable disability requiring special features, which cannot be provided through a reasonable accommodation in the current unit.
4. If the Community Transfer is approved by the Management Agent, the Resident may be required to pay a "Transfer Fee" based on the schedule of fees published for the particular community with Assisted Apartments.
5. Residents will not have to pay the Transfer Fee if the Community Transfer is required or initiated by Atlanta Housing Authority, Owner Entity, or Management Agent, or for such other valid reason, such as a reasonable accommodation as outlined in Section 6, as determined by the Management Agent.
6. The following policies apply to reasonable accommodation transfers:
 - A. All reasonable accommodation transfers have priority over all other transfers, except natural disaster transfers, emergency transfers and relocations;
 - B. Residents of Affordable Communities with disabilities who require a transfer to another Affordable Community as a reasonable accommodation will not be required to make a separate application at the desired Atlanta Housing Authority Affordable Community;
 - C. A Resident's initial security deposit will be transferred to the new unit and no additional security deposit charges will be incurred when the Resident with disabilities transfers to another Affordable Community as a reasonable accommodation; and
 - D. Residents with disabilities who require a transfer as a reasonable accommodation will not incur any termination penalties for early lease termination.
 - E. Management Agents of Affordable Communities and Signature Communities will maintain a Transfer List that prioritizes the transfer of Residents who require a transfer due to an obvious or verified qualifying disability over new admissions of Applicants. The Transfer List will document the following:
 - i. Date and time of each reasonable accommodation transfer request;
 - ii. Name and address of Resident(s) to be transferred;
 - iii. Reason(s) for transfer, including information regarding the Resident's reasonable accommodation request(s) and/or request for a UFAS-Accessible Unit or an Assisted Apartment with accessible features;
 - iv. Current disposition of reasonable accommodation transfer request;

- v. Date of transfer; and
 - vi. Name of Resident transferred out of an Assisted Apartment to accommodate a Resident's disability per the Management Agent's execution of a lease addendum that requires a Resident without a disability to relocate to a vacant, non-accessible unit, at no expense to that Resident.
7. Atlanta Housing Authority may initiate "Relocation Transfers" outside of a community from time to time to facilitate Atlanta Housing Authority's property repositioning strategy, which includes, but is not limited to, the sale of property, revitalization activities, and/or development opportunities related to Atlanta Housing Authority-owned property, or for other valid reasons as determined by Atlanta Housing Authority.
 8. Relocation Transfers are transfers from one Atlanta Housing Authority-owned community to another Atlanta Housing Authority-owned community ("Destination Community"). Relocation Transfers are not considered Community Transfers, as described above in this Article Four, and Residents are not subject to the same requirements as set forth above for Community Transfers. Residents who are subject to Relocation Transfers bypass the waiting list at the Destination Community and receive priority consideration for the first available Assisted Apartment at the Destination Community. Such Residents must meet the eligibility and suitability requirements outlined in Part II of the Statement of Policies in order to be transferred to the Destination Community.
 9. In order to accommodate a Resident household and to avoid overcrowding when a suitably sized apartment is not available, the Resident may request and the Management Agent may approve a Community Transfer from one apartment to two apartments ("Split-Family Transfer"). The Resident's request must be in writing stating the reason for the Split-Family Transfer, unless initiated by the Management Agent. Whether requested by the Resident or initiated by the Management Agent, the Resident must agree in writing to a Split-Family Transfer.
 10. To qualify for a Split-Family Transfer, the Resident household must meet the requirements of this Article Four and the proposed Heads-of-Household of the units to be assigned under the Split-Family Transfer must be: (a) listed on the existing Lease as a member of the household as of the most recent recertification; and (b) legally capable of executing a lease.
 11. Split-Family Transfers may be used by Resident households subject to Relocation Transfers when a suitably sized apartment is not available in a Destination Community. Such Resident households must qualify for the Split-Family Transfer pursuant to this Article Four, as applicable.

ARTICLE FIVE.

INDIVIDUAL DEVELOPMENT ACCOUNT (IDA) PROGRAM

Having eliminated the federal earned income disallowance for Residents paying an Income Adjusted Rent, Atlanta Housing Authority, in its discretion, may implement

an IDA initiative which would promote and encourage personal economic independence among Residents through a monetary incentive program.

1. The IDA initiative would be linked to meaningful capacity-building initiatives offered by a variety of organizations and institutions in Atlanta.
2. A mechanism would be created for eligible Residents which would allow them to accrue a portion of their rental payments, which is in excess of a monetary threshold as determined by Atlanta Housing Authority, in a separate IIDA.
3. To fulfill the eligibility requirements of the program, all Residents would be enrolled in the IDA initiative, and would be required to participate in a personal economic development program approved by Atlanta Housing Authority.
4. The IDA initiative would give Residents the opportunity to accumulate financial resources to assist in their transition off of subsidy assistance.
5. The IDA initiative incentive would require eligible Residents to participate successfully by obtaining employment and achieving other economic independence milestones established under an approved economic independence program.
6. As Residents achieve their individualized milestones, Atlanta Housing Authority would collect and defer a portion of the rents collected beyond the assessed carrying cost of the Assisted Apartment in an IDA fund.
7. Residents that achieve the self-sufficiency and economic independence milestones would be eligible for reimbursement of IDA funds. Those who do not achieve their milestones would not be eligible for the IDA initiative nor would they be eligible to receive a reimbursement of any portion of the funds in the IDA account.

ARTICLE SIX.

PET POLICY

1. Atlanta Housing Authority will permit Residents of Affordable Communities to keep common household pets or other animals that are widely acknowledged and accepted as household pets, provided the Resident's keeping of a pet is not a threat to the health and safety of other residents and otherwise meets the requirements established by the Management Agent for the community.
2. Residents of communities with Assisted Apartments are not allowed to keep animals that are not widely acknowledged and accepted as household pets; to keep unregistered household pets; to keep household pets temporarily; or train or engage in any business activity related to household pets in the Resident's apartment, or anywhere else within the community.
3. Residents in a Signature Community, who desire to keep a common household pet, may only do so if household pets are generally allowed at the community and then only in strict accordance with the household pet procedures prescribed at the Resident's Signature Community, except as provided for in Section 5 below with respect to Assistance Animals.

4. Certain Signature Communities may exclude common household pets altogether if it is in the best interest of the community to do so, except as provided for in Section 5 below.
5. Management Agents will make reasonable accommodations for an “assistance animal”. Pet policies for Affordable Communities and Signature Communities shall:
 - A. Expressly exclude Assistance Animals;
 - B. Clarify that an “Assistance Animal” is an animal that is needed as a reasonable accommodation for persons with disabilities and is not generally subject to the standard pet policy;
 - C. Define an “Assistance Animal” as an animal that is needed as a reasonable accommodation for persons with disabilities (Assistance Animals are animals that work, provide assistance, or perform tasks for the benefit of a person with a disability; or animals that provide emotional support that alleviate one or more identified symptoms or effects of a person’s disability);
 - D. Remove unreasonable height and weight restrictions for Assistance Animals;
 - E. Remove unreasonable breed restrictions for Assistance Animals, except in accordance with local laws or ordinances;
 - F. Remove pet deposits for Assistance Animals; and

ARTICLE SEVEN. DISPUTING DECISIONS OF MANAGER

The purpose of Article Seven is to provide Applicants and Residents with a dispute process to address eligibility, general admissions, occupancy and leasing issues, and requests for reasonable accommodations in a manner that seeks equitable resolutions to such issues in an expedient and responsive manner. Applicants and Residents with disabilities may request reasonable accommodations in order to participate in the dispute process.

The dispute process outlined in this Article Seven shall not govern the process related to the denial of admission based on the findings of a criminal history report as outlined in Part II, Article Seven, Paragraph 4 (Adverse Criminal History Decision) of the Statement of Policies.

1. DISPUTE PROCESS FOR APPLICANTS

- A. Applicants for Assisted Apartments who are denied admission based on eligibility and general admissions criteria and desire to dispute this action must request a meeting with the Management Agent or the Management Agent’s designee within ten (10) calendar days of the disputed action.

- B. An Applicant's request for a meeting must be in writing.
- C. The Management Agent will schedule the meeting within a reasonable period of time, provided the Applicant's written request for the meeting was received in a timely manner.
- D. An Applicant may bring a representative to this meeting to assist the Applicant.
- E. The Management Agent is under no obligation to meet with the Applicant after the conclusion of the requested meeting.
- F. A written decision should be provided to the Applicant within a reasonable time following the conclusion of the meeting. If the Management Agent's decision is to deny the application, the decision shall set forth the reasons for the denial.

2. DISPUTE PROCESS FOR RESIDENTS

- A. The Management Agent is authorized under the terms of the Lease, Lease Addenda, and Apartment Rules to initiate an adverse action against a Resident with respect to leasing and occupancy violations that may result in a denial, significant reduction or termination of benefits otherwise due a Resident.
- B. Residents may dispute such adverse actions.
- C. Residents must request a meeting with the Management Agent or the Management Agent's designee within ten (10) calendar days of notice of the adverse action or in accordance with the dispute handling procedures in effect at the Resident's community with Assisted Apartments.
- D. The period of time within which the Resident must request a meeting may be shorter if the Resident's Lease is being terminated for criminal activity and the Management Agent has reasonably determined that the Resident poses a threat to the health and safety of the Community.
- E. A Resident's request for a meeting must be in writing.
- F. The dispute process at each community with Assisted Apartments must allow the Resident to meet with an impartial designee of the Management Agent who did not participate in the initial decision affecting the Resident. The impartial designee may not be a subordinate of the person who made the initial decision. Any Resident meetings with the person who made the initial decision and the impartial designee may be combined, at the discretion of the Management Agent. A Resident may bring a representative to this meeting or meetings to assist the Resident.
- G. The impartial designee of the Management Agent is under no obligation to meet with the Resident about the dispute after the conclusion of the final meeting.

- H. A written decision should be provided to the Resident within a reasonable time following the conclusion of the meeting. If the impartial designee's decision is to rule against the Resident, the decision shall set forth the reasons for the denial, significant reduction or termination of benefits.

PART IV - MISCELLANEOUS

ARTICLE ONE. AVAILABILITY OF OFFICIAL LEASING DOCUMENTS

1. Official leasing-related documents will be maintained in the management office of any community with Assisted Apartments.
2. Official leasing-related documents can be reviewed by Applicants, Residents, and other interested parties upon reasonable request and notice during normal office hours.
3. Amendments and/or updates to Fee Schedules, Rent Structures, Utility Allowances, Routine Maintenance and other charges may be approved from time to time. Such amendments and/or updates shall be implemented only after Residents have been given reasonable notice of the effective date.

ARTICLE TWO. SPECIAL PROGRAM, POLICY AND/OR STRATEGIC INITIATIVES

Atlanta Housing Authority may establish special programs, policies and strategies designed to address Resident economic or life-style self-sufficiency programs, *Moving to Work Demonstration Program* initiatives, safe and secure community enhancements and admission policies related to the use of bona fide law enforcement agencies or personnel, and homeownership opportunities.

Written proposals outlining procedures and processes developed for any special program, policy and/or strategy must be approved and/or authorized by the President and Chief Executive Officer for inclusion in the MTW Annual Plan or protocol before the initiative can be implemented.

ARTICLE THREE. RESPONSE TO FEDERALLY DECLARED DISASTERS AND OTHER FEDERALLY DECLARED EMERGENCIES

In order to respond to federally declared disasters and other federally declared emergencies Atlanta Housing Authority may provide disaster or other emergency relief utilizing Atlanta Housing Authority-owned conventional public housing apartments, subject to HUD or another third party providing additional funding or other resources for these purposes.

1. The President and Chief Executive Officer is authorized to develop an agency-wide disaster or other emergency relief plan to address the needs arising from a disaster or other emergency in a strategic, meaningful, and effective manner pursuant to applicable rules, regulations, emergency legislation, and Executive Orders.

2. The President and CEO is further authorized to take any action that the President and CEO may deem necessary and appropriate pursuant to federal disaster relief authorizations applicable to housing programs within the scope of the resources available to Atlanta Housing Authority, and to waive Atlanta Housing Authority's administrative policies governing Atlanta Housing Authority-owned conventional public housing communities related to intake procedures including but not limited to establishing a preference for disaster victims on waiting lists for Atlanta Housing Authority-owned conventional public housing, rent collections, subsidy payments, work program compliance, and other related and relevant administrative policies.
3. The President and CEO will provide the Board of Commissioners with a full report on a disaster or emergency relief plan implemented pursuant to this Article Three.

ARTICLE FOUR. APPROVAL OF MANAGEMENT PRACTICES

Management Operating Procedures, administrative procedures, processes, protocols, and management practices for any policy, initiative, or approach in this Statement of Policies shall be developed following the intent of this Statement of Policies and may be approved, amended, or withdrawn at the discretion of Atlanta Housing Authority.

ARTICLE FIVE. REVISIONS TO THE STATEMENT OF POLICIES

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

[END OF SECTION A]

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Section B.

*Statement of Policies
Governing the Housing Choice Tenant-Based Program*

The Housing Authority of the City of Atlanta, Georgia

Statement of Policies Governing the Housing Choice Tenant-Based Program

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The Housing Authority of the City of Atlanta, Georgia

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The Housing Authority of the City of Atlanta, Georgia
Statement of Policies
Governing the Housing Choice Tenant-Based Program

PREAMBLE

This *Statement of Policies Governing the Housing Choice Tenant-Based Program* (“Statement of Housing Choice Policies”) forms the broad policy basis of and authorizes the establishment of administrative procedures and practices that govern the Housing Choice Tenant-Based Program of The Housing Authority of the City of Atlanta, Georgia (“Atlanta Housing Authority” or “AHA”).

The Statement of Housing Choice Policies is organized around the guiding principles of Atlanta Housing Authority’s continuing success as a provider or sponsor of quality affordable housing in its role as a leader in community building initiatives that create vibrant and safe environments for families, seniors and persons with disabilities.

The Statement of Housing Choice Policies envisions and supports a Housing Choice Tenant-Based Program that is creative in design, effective in the development of procedures and processes, and nimble in the successful implementation of the program and related initiatives that enhance the quality of life of participating families, seniors and persons with disabilities. The Housing Choice Tenant-Based Program is a means for eligible participants to access quality housing in communities of opportunity and promote participant economic and lifestyle self-sufficiency.

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

Housing Choice policies were first adopted by Atlanta Housing Authority’s Board of Commissioners on August 25, 2004. This Statement of Housing Choice Policies, incorporated into this Statement of Corporate Policies as Section B, represents the amendment and restatement of those Housing Choice policies and therefore supersedes all prior versions of Atlanta Housing Authority’s Statement of Housing Choice Policies.

This Statement of Housing Choice Policies may be amended or modified by the President and Chief Executive Officer at any time without a vote of the Board of Commissioners, provided that such amendments and modifications do not materially change the intent of those Policies.

PART I – INTRODUCTION

ARTICLE ONE. OBJECTIVE

This Statement of Housing Choice Policies is Atlanta Housing Authority’s policy document for the Housing Choice Tenant-Based Program (“Program”) in support of Atlanta Housing Authority’s Vision of Healthy Mixed-Income Communities; Healthy Self-Sufficient Families.

ARTICLE TWO. PROGRAM MANAGEMENT AND OPERATING PROCEDURES

1. The operating division designated by Atlanta Housing Authority is responsible for performing all program management functions related to the implementation and administration of the Program (“Operations Division”). The Operations Division is responsible for developing and implementing written Program operating procedures (“Operating Procedures”) that are consistent with the policies outlined in this Statement of Housing Choice Policies.
2. Atlanta Housing Authority may create and apply technology solutions to improve the efficiency and effectiveness of applicable program management functions in order to create, where appropriate and practical, a paperless environment. The Operations Division will include the requirements, procedures and processes for the implementation and administration of technology solutions and concomitant applications in the Operating Procedures.
3. The terms Applicant and Participant are defined to include all household members with respect to their compliance with the policies set forth in the Statement of Housing Choice Policies and implemented through the Operating Procedures.

ARTICLE THREE. MOVING TO WORK DEMONSTRATION PROGRAM

1. As a Moving to Work agency, Atlanta Housing Authority will establish, implement and evaluate innovative affordable housing strategies that are designed to achieve greater success in helping low income families achieve economic independence.
2. While recognizing that implementation of strategic initiatives may be immediate, progressive, or refined through various activities and demonstration programs, the implementation of those strategic initiatives, not expressly enumerated in Atlanta Housing Authority’s Moving to Work (MTW) Annual Plan, may be advanced, provided such strategic initiatives are consistent with the Statement of Housing Choice Policies and the spirit and intent of the authorizations under the MTW Agreement.
3. Administrative procedures, processes and general management practices for new strategic initiatives shall be developed following the intent of this Statement of Housing Choice Policies and, upon review and approval, may be amended from time to time at the discretion of Atlanta Housing Authority.

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

ARTICLE FOUR. FAIR HOUSING AND EQUAL OPPORTUNITY; REASONABLE ACCOMMODATIONS

1. Atlanta Housing Authority supports all applicable Federal and State nondiscrimination and fair housing laws and applicable U.S. Department of Housing and Urban Development (“HUD”) regulations in all housing and program activities. Atlanta Housing Authority monitors fair housing and equal opportunity compliance throughout its portfolio.
2. Atlanta Housing Authority supports the protections afforded victims under the *Violence Against Women Act*, and has included administrative measures to address those protections in the Operating Procedures, as applicable.
3. Atlanta Housing Authority acknowledges the importance of serving persons with Limited English Proficiency (LEP). Atlanta Housing Authority has developed a LEP plan to identify and offer assistance to persons having LEP. Persons with LEP are individuals who, because of their national origin, do not speak English as their primary language and who have a limited ability to speak, read, write or understand English. In accordance with Federal guidelines, Atlanta Housing Authority will make reasonable efforts to provide or arrange language assistance for Applicants and Participants with LEP if they require such assistance in order to access Atlanta Housing Authority’s programs and client activities.
4. Atlanta Housing Authority shall assist Applicants and Participants with disabilities in accordance with such federal laws, rules and regulations that are applicable to the administration of the Program with respect to application procedures, ongoing program participation, and procedures related to the acceptance, processing and disposition of reasonable accommodation requests. Atlanta Housing Authority will make reasonable accommodations in policies, procedures, rules and services when such accommodations are necessary to afford persons with disabilities an equal opportunity to participate in or benefit from its programs. Requests for accommodations must be reasonable, meaning Atlanta Housing Authority is not required to provide accommodations which would cause either undue financial or administrative burden or a fundamental alteration in the nature of Atlanta Housing Authority’s programs. Requests for Reasonable Accommodations will be considered on a case-by-case basis so that Atlanta Housing Authority can consider, among other factors, the cost of the requested accommodation, the benefits that the accommodation would provide to the requester and the availability of alternative accommodations that would effectively meet the requester's disability-related needs.

5. For reasonable accommodations purposes, HUD defines a “person with disabilities” or “disabled person” as a person who has a physical or mental impairment that substantially limits one or more major life activities; has a record of such impairment; or is regarded as having such an impairment. Atlanta Housing Authority, the Owner Entities and their respective Management Agents apply this definition to reasonable accommodations requests. (The definition of a “person with disabilities” or “disabled person” for the purpose of determining program eligibility, including exemption from Atlanta Housing Authority’s work requirement, is set forth at Part II, Article Five, Section 5.)

ARTICLE FIVE.

FRAUD AND MISREPRESENTATION

1. Applicants and Participants are required to provide truthful, complete information to Atlanta Housing Authority relating to participation in other housing subsidy programs, income from all sources, employment status of all household members, household composition, and background information for all members of the household to qualify for initial eligibility and continued participation in the Program.
2. Applicants and Participants who engage in acts of fraud and misrepresentation are subject to loss of Program benefits and prosecution under State and Federal laws, and where appropriate, will be referred by Atlanta Housing Authority for criminal prosecution.
3. An Applicant or Participant who has made any misrepresentation, who has omitted or misrepresented material information, or engaged in acts of fraud at the time of admission, during any subsequent recertification, or at any other time shall be denied admission or be subject to termination, as applicable.

PART II – ADMISSION TO THE PROGRAM

ARTICLE ONE.

WAITING LIST NOTIFICATION

1. Atlanta Housing Authority will comply with all Fair Housing and Equal Opportunity requirements applicable to public notices announcing the opening and closing of the Program waiting list (“Waiting List”) for a Housing Choice Tenant-Based Voucher (“Voucher”).
2. Atlanta Housing Authority will make reasonable efforts to provide adequate notification to potential applicants with respect to applicant eligibility, the period of the opening, reasonable accommodations opportunities and other details related to the acceptance of applications to the Waiting List as set forth in the Operating Procedures.

ARTICLE TWO.

SPECIAL ADMISSIONS

1. Atlanta Housing Authority may accept applications from eligible households who have relocated from a community owned by Atlanta Housing Authority due to demolition, repositioning, disposition or other related Atlanta Housing Authority activities without opening the Waiting List.

2. Atlanta Housing Authority, in its discretion, may authorize the special admission of eligible and qualified applicants to the Program, in order to implement special initiatives; offer homeownership opportunities to eligible households; admit households impacted by an owner opt-out of a housing assistance contract on a HUD-insured multi-family development; address an urgent local need as determined and approved by Atlanta Housing Authority including, but not limited to, foreclosure assistance and natural disasters; or provide relocation and/or transfer assistance to an eligible and qualified person with a verifiable disability who resides in an Atlanta Housing Authority-owned community or whose name is on a transfer/waiting list to be assisted under any Atlanta Housing Authority housing program as a reasonable accommodation.
3. Any household eligible for a special admission under this Article Two will not be denied a Voucher for admission to the Housing Choice Program provided that no member of the household has committed an offense specifically identified by HUD pursuant to 24 CFR 982.353 as described in Part XII, Article Three, Section 2 of this Statement of Housing Choice Policies. Atlanta Housing Authority, in its discretion, may deny special admission to a household if any member of the household has committed a violent or drug-related offense as described in Part XII, Article Three, Section 3 of this Statement of Housing Choice Policies.
4. Procedures, processes and general management practices for special admissions will be outlined in the Operating Procedures.

ARTICLE THREE. APPLICATION

The application process and administrative procedures for placing Applicants on the Waiting List and determining eligibility and qualification for selection and program participation are set forth in the Operating Procedures.

ARTICLE FOUR. ORGANIZATION AND MAINTENANCE OF THE WAITING LIST

1. The equitable methods of ranking Applicants on the Waiting List and the processes for organizing, updating and maintaining Applicant records are set forth in the Operating Procedures. AHA, in its discretion, may establish reasonable procedures related to the Waiting List, including but not limited to procedures for reevaluating the reliability of waiting list information provided by Applicants, exploring alternative lottery strategies for the selection of applicants and setting the requirement that applicants on the Waiting List must notify AHA of their interest within a specified period of time in order to remain on the Waiting List.
2. The maintenance of the Waiting List with respect to updating applications, notice letters, and purges will be detailed in the Operating Procedures.
3. Applicant responsibilities and requirements for updating changes to the information reported during the application process and for responding to requests for information are stated in the Operating Procedures.

ARTICLE FIVE.

SELECTION TO THE PROGRAM (“SELECTION”)

1. Definitions of Family:

- A. A Family is defined as one or more persons who may or may not be related that are residing together in the same household.
- B. An Elderly Family is defined as a Family in which the head-of-household, co-head, spouse, or sole adult member of the household is age 62 or older.
- C. A Disabled Family is defined as a Family in which the head-of-household, spouse, or sole adult member of the household is a person with a verified qualifying disability. The definition of a “person with disabilities” in this context is consistent with HUD’s definition of a “person with disabilities” for program eligibility purposes, and is set forth at Part II, Article Five, Section 5.

2. Any member of a Participant household who is under the age of 18, a person (other than the head, co-head or spouse) with a verifiable disability and a full-time student (subject to documented verification) up to the age of 24 will be considered a dependent of the Participant household. The definition of a “person with disabilities” in this context is consistent with HUD’s definition of a “person with disabilities” for program eligibility purposes, and is set forth at Part II, Article Five, Section 5.

3. Selection Qualifications.

To be selected from the waiting list, applicants must meet all of the eligibility criteria set forth below in Part III and demonstrate compliance with AHA’s Work Requirement, which is as follows:

A. Atlanta Housing Authority’s Work Requirement

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

AND

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

a. Full-time work:

Legally employed or self-employed on a full-time basis at least 30 hours per week; or

b. Full-time school:

Enrolled in and attending an AHA-recognized school or institution as a full-time student; or

c. Part-time work and part-time school/training for a combined minimum of 30 hours per week of employment and education/training:

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

(ii) And one of the following:

(a) Enrolled in and attending an AHA-recognized school or institution on a part-time basis, or

(b) Participating in an AHA-recognized training program.

B. Exemptions from Atlanta Housing Authority's Work Requirement

i. Elderly persons age 62 and older are exempt from AHA's Work Requirement.

ii. Persons with Disabilities, as defined by HUD for program eligibility purposes, are also exempt from AHA's Work Requirement. The definition of a "person with disabilities" in this context is consistent with HUD's definition of a "person with disabilities" for program eligibility purposes, and is set forth at Part II, Article Five, Section 5.

4. General Considerations for Selection

A. Participants, or any member of the Participant's household, who becomes unemployed due to her/his resignation, retirement, quitting, termination, firing or other reasons, shall not receive any rent relief as a result of the loss of employment and shall continue to be responsible for the entire Total Tenant Payment based on prior employment and income status.

B. Participants who provide third party verification satisfactory to AHA that loss of employment was due solely to a layoff will receive consideration for a reduction in Total Tenant Payment.

C. To be eligible for Selection in accordance with this Article, an Applicant's qualifications for Selection as a Participant must be verified through appropriate documentation as set forth in the Operating Procedures.

5. Disability Definitions for Program Eligibility Determinations

To determine whether a person is "disabled" or a "person with disabilities" for the purpose of establishing program eligibility, HUD applies the following definitions:

A. A disabled person is one with an inability to engage in any substantial gainful activity because of any medically determinable physical or mental

impairment that is expected to result in death or has lasted or can be expected to last continuously for at least 12 months; or for a blind person at least 55 years old, inability because of blindness to engage in any substantial gainful activities comparable to those in which the person was previously engaged with some regularity and over a substantial period.

- B. A developmentally disabled person is one with a severe chronic disability that:
 - a. is attributed to a mental and/or physical impairment;
 - b. has manifested before age 22;
 - c. is likely to continue indefinitely;
 - d. results in substantial functional limitations in three or more of the following areas: capacity for independent living, self-care, receptive and expressive language; learning, mobility, self-direction, and economic self-sufficiency AND
 - e. requires special interdisciplinary or generic care treatment, or other services which are of extended or lifelong duration and are individually planned or coordinated.

- C. A disabled person is also one who has a physical, emotional or mental impairment that:
 - d. is expected to be of long-continued or indefinite duration;
 - e. substantially impedes the person's ability to live independently;
 - f. is such that the person's ability to live independently could be improved by more suitable housing conditions.

- D. A person whose disability is based solely on any drug or alcohol dependence is not to be considered a person with disabilities for program eligibility purposes.

PART III – ELIGIBILITY

ARTICLE ONE. DETERMINATION AND VERIFICATION

An Applicant desiring to participate in the Program must complete a full application in accordance with the Operating Procedures and demonstrate that: (a) Applicant meets one of the definitions of Family and is an eligible low income household based on total annual household income pursuant to and verified according to this Statement of Housing Choice Policies and the Operating Procedures for the Program; (b) Applicant fully satisfies applicable statutory and HUD's regulatory requirements for citizenship and/or eligible immigrant status; (c) Applicant is in compliance with the qualifications for selection outlined in Part II, Article Five; (d) Applicant would be a suitable Participant based on past satisfactory behavior including, but not limited to, housekeeping performance, acceptable payment records for rent and/or utilities (as applicable), acceptable credit history, acceptable criminal background record; and (e) Applicant is able to comply with all Program obligations.

ARTICLE TWO.

PARTICIPANT OBLIGATIONS AND RESPONSIBILITIES

1. Participants must occupy their assisted unit as their sole place of residence and conduct themselves in an acceptable and responsible manner that would not adversely impact the quiet and peaceful enjoyment of the premises and neighborhood by other community residents.
2. Participants must meet all obligations set forth in this Statement of Housing Choice Policies as implemented through the Operating Procedures, including, but not limited to those obligations relating to lease violations, housekeeping, criminal activity prohibitions, other health and safety concerns, and economic independence initiatives.

ARTICLE THREE.

SUITABILITY

Atlanta Housing Authority determines Participant eligibility for Atlanta Housing Authority's Program in accordance with the Operating Procedures but does not otherwise screen Participants as to their suitability as tenants. It is the rental property owner's (Owner/Landlord) responsibility, not Atlanta Housing Authority's responsibility, to screen and make its own determination regarding the suitability and acceptability of Participants as prospective tenants using the Owner/Landlord's own screening criteria in compliance with the Fair Housing Act and other applicable requirements. As a general practice, Atlanta Housing Authority does not provide its screening reports to Owners/Landlords and Owner/Landlords may not rely upon such screening reports for any purpose.

ARTICLE FOUR.

INELIGIBILITY DETERMINATION

Atlanta Housing Authority will notify Applicants, in writing, of an ineligibility determination. Such notification will set forth the reasons for the ineligibility determination and provide instructions regarding how the ineligible Applicant may request a review of the determination.

ARTICLE FIVE.

ECONOMIC SELF-SUFFICIENCY

Atlanta Housing Authority, in its discretion, may explore strategies that recognize the progression of Participants toward economic self-sufficiency which lead to their graduation from the Program. Such strategies may only be incorporated in the Operating Procedures upon approval by the President and Chief Executive Officer.

PART IV – RENT

ARTICLE ONE.

HOUSING AFFORDABILITY POLICY

In order to preserve housing affordability for Participants of the Program, each Participant, unless subject to the minimum rent established by Atlanta Housing Authority, will pay no more than 30% of the household's monthly adjusted income for rent and utilities and other services ("Total Tenant Payment").

ARTICLE TWO. TENANT RENT

The rent payable to the Owner/Landlord by the Participant is the Tenant Rent. The Tenant Rent will be equal to the Total Tenant Payment unless the Total Tenant Payment has been reduced by an allowance for any utility or service for which the Participant has full responsibility pursuant to the lease agreement between the Participant and Owner/Landlord. Determinations of the Total Tenant Payment and Tenant Rent will be in accordance with the Operating Procedures.

ARTICLE THREE. UTILITY ALLOWANCE SCHEDULE

The schedule of utilities and other services (“Utility Allowance Schedule”) used in calculating Tenant Rent will be analyzed on a periodic and ongoing basis in order to identify any fluctuations and trends in the cost of utilities and services within Atlanta Housing Authority’s jurisdiction. If such analysis reveals an extraordinary increase in the cost of utilities and services that will have a discernible impact on Participants, Atlanta Housing Authority will revise the Utility Allowance Schedule and implement it within a reasonable time frame in order to preserve housing affordability for Participants. Such ongoing analysis notwithstanding, Atlanta Housing Authority will conduct a comprehensive review of the cost of utilities and services on an annual basis and issue a Utility Allowance Schedule each calendar year in accordance with the Operating Procedures.

ARTICLE FOUR. MINIMUM RENT

1. Participants must pay a minimum rent of \$125, or such other amount approved by Atlanta Housing Authority.
2. The minimum rent requirement does not apply to Participant households, in which all adult household members are either elderly (62 and older) and/or disabled. The definition of a “person with disabilities” in this context is consistent with HUD’s definition of a “person with disabilities” for program eligibility purposes, and is set forth at Part II, Article Five, Section 5.
3. Generally, Atlanta Housing Authority does not expect that the establishment of a new minimum rent will create a hardship since no such rent initiatives will go into effect without providing advance notice. Even so, a Participant who has previously paid one or more months of rent but is unable to pay the minimum rent, due to extraordinary financial distress, may request hardship consideration.
 - A. A hardship may exist when any one of the following circumstances is present: (i) the family has lost eligibility for or is waiting eligibility determination for a Federal, State or local assistance program; (ii) the income of the family has decreased because of extraordinary changed circumstances, including layoff from a job ; or (iii) such other extraordinary circumstances as Atlanta Housing Authority may determine.
 - B. Atlanta Housing Authority shall promptly investigate any request for hardship and take appropriate actions based on whether a hardship is established and the family is otherwise complying with its obligations under an approved economic independence program and the planning

documents formulated for the family. Such actions may include, but not be limited to:

- i. Temporary suspension of the entire minimum rent under such terms as Atlanta Housing Authority shall direct. Such suspensions shall not last greater than ninety (90) days unless otherwise extended upon the written request of the Participant household based on verifiable circumstances reasonably affecting the Participant household's ability to pay the minimum rent. The period of the temporary suspension may be extended by the Atlanta Housing Authority after supervisory review and documented approval of the request;
 - ii. Accelerated enrollment in one of Atlanta Housing Authority's approved economic independence program components;
 - iii. Referral to third party agencies who assist participants with the payment of rent; and
 - iv. Such other actions as Atlanta Housing Authority shall direct.
- C. The Participant household will not be required to pay minimum rent arrearages that accumulated during the entire period of an approved temporary suspension of the minimum rent as set forth in paragraph B above.

ARTICLE FIVE.

ELDERLY/NON-ELDERLY INCOME DISREGARD

1. AHA, in determining annual household income, will disregard the employment income of an Elderly Person (62 and older) or Non-Elderly Disabled Person whose sole source of income is Social Security, SSI, and/or other similar fixed income received from a verified plan (Annual Fixed Income), provided the employment income does not result in the discontinuance of the Elderly Person's or Non-Elderly Disabled Person's sole source of Annual Fixed Income. The definition of a "person with disabilities" in this context is consistent with HUD's definition of a "person with disabilities" for program eligibility purposes, and is set forth at Part II, Article Five, Section 5. This policy is applicable to all AHA housing assistance programs and serves as the replacement for any applicable HUD rules and regulations. AHA, in its discretion, may establish reasonable verification procedures and documentation requirements to ensure program integrity.

ARTICLE SIX.

RENT SIMPLIFICATION

1. Atlanta Housing Authority, in its discretion, may explore innovative rent simplification strategies and methodologies for determining Tenant Rent that are beneficial to Participants, while streamlining administrative processes and procedures for Atlanta Housing Authority, Owners/Landlords and Participants ("Rent Simplification"). Prior to the implementation of any proposed Rent Simplification strategy or methodology, AHA will conduct an impact analysis to determine whether the implementation of any change in determining Tenant Rent will produce an unreasonable rent burden on Participants ("Rent Burden Impact Analysis"). The Rent Burden Analysis supporting any proposed Rent

Simplification strategy or methodology must be submitted to and approved by the Atlanta Housing Authority Board of Commissioners before implementation.

2. Atlanta Housing Authority, in its discretion, may establish fixed-rate, or standard deduction and asset determination procedures to be used in calculating annual income. Standard income deductions would replace the calculation of income deductions based on actual expenses. Asset determinations would examine the nature and value of the asset in establishing procedures for setting a schedule of assets that would or would not be used in calculating annual income. The President and Chief Executive Officer, as approved by the Atlanta Housing Authority Board of Commissioners, is authorized to approve revisions to the schedule of Standard Income Deductions and revisions to the treatment of assets. If it is determined that the implementation of any such revision could impact Tenant Rent, a Rent Burden Impact Analysis and Board of Commissioners approval will be required.

PART V – SUBSIDY STANDARDS

ARTICLE ONE.

VOUCHER SIZE

1. The size of the rental housing unit that a Participant may lease under the Program is based on the number of bedrooms Atlanta Housing Authority has approved for the Participant's Voucher ("Voucher Size").
2. A Participant may not lease a rental housing unit that has more bedrooms than the Voucher Size unless approved by Atlanta Housing Authority. In the event Atlanta Housing Authority approves a Participant's request for a change in the Voucher Size, a new Voucher with the approved Voucher Size will be issued to the Participant.
3. To avoid overcrowding and the conditions that may arise from overcrowding, the Voucher Size of the Voucher issued to each eligible Participant will be determined in accordance with Operating Procedures based on the verifiable needs of the Participant household. A variety of factors, including, but not limited to, the number of people in the household, the age and gender of household members, special needs and reasonable accommodations requests, will be considered in determining Voucher Size.

ARTICLE TWO.

EFFECT OF LIVE-IN AIDE ON VOUCHER SIZE

One additional bedroom may be added to increase the Voucher Size when it is determined that a Live-in Aide that is essential for the care and support of an elderly or disabled Participant or household member will reside in the assisted unit with the elderly or disabled Participant or household member, but only after the need for a Live-In Aide has been certified by a medical professional and approved by Atlanta Housing Authority in accordance with the Operating Procedures.

PART VI – ALIGNMENT OF AHA PAYMENT STANDARDS WITH MARKET RENTS

ARTICLE ONE. MTW AUTHORIZATION

1. The MTW Agreement recognizes the spirit and intent of Atlanta Housing Authority’s overarching goal of being a superior provider of affordable housing that will expand, improve and diversify Atlanta Housing Authority’s influence on the affordable housing market and promote and support Participant self-sufficiency.
2. In establishing Atlanta Housing Authority’s Housing Choice Tenant-Based Program, the provisions of the MTW Agreement authorize Atlanta Housing Authority to determine reasonable contract rents and increases to such rents, rent reasonableness methodologies and adjustments to the payment standards.
3. Atlanta Housing Authority, in its discretion and pursuant to the MTW authorizations as summarized in this Article One, may explore, establish and implement different rent structures to further align the Program with private sector practices as well as to maximize the use of the subsidy resource to promote and support economic independence among Program Participants.

ARTICLE TWO. SETTING MARKET RENTS

1. Methodologies for setting market rents will utilize data derived from a variety of resources including, but not limited to, market rent studies (whether conducted by Atlanta Housing Authority or other public or private entities), HUD Fair Market Rent data from Atlanta and/or other comparable metropolitan markets, private sector databases, academic and other empirical studies, and regional economic forecasts.
2. Atlanta Housing Authority will utilize market practices and other recognized methods for establishing subsidy standards (“AHA Payment Standards”) in order to determine the contract rents that will be paid to Owners/Landlords. These standards will be used in place of the Fair Market Rents published annually in the Federal Register and will be used as the basis for establishing reasonable contract rents.

ARTICLE THREE. AHA PAYMENT STANDARDS

1. AHA Payment Standards will be consistent with the objectives and determinations for setting market rents outlined in this Part VI with respect to aligning the Program with private sector practices and maximizing the use of the subsidy resource in support of strategies that promote the deconcentration of poverty and broader opportunities, enhance opportunities for the development of affordable housing, provide reasonable accommodation for disabled and elderly Participants, and provide for the sustainability of the Program.
2. Atlanta Housing Authority, in its discretion, will establish, implement and publish a Schedule of AHA Payment Standards for each submarket area within

its jurisdiction or a Schedule of Payment Standards applicable to a broader area in support of portability initiatives.

3. Atlanta Housing Authority, in its discretion, may amend the AHA Payment Standards based on changing market conditions.
4. The procedures for implementing the AHA Payment Standards will be outlined in the Operating Procedures.
5. Exceptions to the AHA Payment Standards may be granted on a case-by-case basis with director-level or above approval based on the quality of the housing regardless of submarket, the location of the housing with respect to its proximity to revitalization activities, a reasonable accommodation request, and other reasonable requests related to achieving Atlanta Housing Authority's goals. The procedures for granting exceptions will be included in the Operating Procedures.

ARTICLE FOUR. DECONCENTRATION

1. Atlanta Housing Authority's policies regarding AHA Payment Standards and Setting Market Rents support effective strategies for the deconcentration of poverty by providing Participants with meaningful and broader housing opportunities in accessing quality affordable housing.
2. Atlanta Housing Authority has an established policy that no more than forty percent (40%) of the units in a multifamily community, as defined in the Operating Procedures, will be assisted under Section 8 and/or Section 9 of the United States Housing Act of 1937, as amended unless (i) the multifamily community has been designated as housing for Elderly Families and/or Disabled Families; or (ii) the multifamily community was built or substantially rehabilitated for occupancy by Elderly Families and/or Disabled Families.
3. Atlanta Housing Authority has an established policy that up to 100% of the units may be assisted under Section 8 and/or Section 9 of the United States Housing Act of 1937, as amended, in a multifamily community, as defined in the Operating Procedures, that has been designated as housing for Elderly Families and/or Disabled Families or was built or substantially rehabilitated for occupancy by Elderly Families and/or Disabled Families.
4. Atlanta Housing Authority, in its discretion, may develop a deconcentration strategy that would limit the percentage of Program Participants in designated census tracts in the City of Atlanta with the goal and intent of limiting occupancy in areas with high poverty concentrations.

PART VII – VOUCHER ISSUANCE

ARTICLE ONE. FAMILY BRIEFINGS

Applicants and Participants are required to participate in an information briefing in order to receive a Voucher. The purpose of the briefing is to inform, review and educate Applicants and Participants regarding Program procedures, their family obligations, their compliance with Program requirements and available housing

opportunities. The briefing will be conducted in accordance with the Operating Procedures.

ARTICLE TWO. TERM OF VOUCHER ISSUANCE

Vouchers are issued to Applicants and Participants for a reasonable period of time in accordance with the Operating Procedures. Extensions to the term of the Voucher may be granted on a case-by-case basis, reasonable accommodation requests, and other reasonable requests related to an Atlanta Housing Authority special or strategic initiative. The procedures for granting extensions will be included in the Operating Procedures.

ARTICLE THREE. TRANSFER OF ASSISTANCE

1. An Applicant or Participant cannot transfer her/his Voucher to another person or family. There is no expressed nor implied right that permits or entitles the selective transfer of a Voucher that was issued to an Applicant or Participant for her/his exclusive use as head-of-household on behalf of an assisted household.
2. If the Voucher holder, as the head-of-household of a housing unit assisted under the Program, abandons, leaves, moves out of or is involuntarily removed from the household or dies, Atlanta Housing Authority will determine the disposition of the Voucher in accordance with the Operating Procedures.

PART VIII – INTER-JURISDICTIONAL COOPERATION

ARTICLE ONE. COOPERATIVE AGREEMENTS

Atlanta Housing Authority will seek to establish cooperative agreements and similar arrangements between and among other housing agencies in other jurisdictions administering the Housing Choice Tenant-Based Program with respect to Voucher portability relating to eligibility, inspections, program requirements, fee sharing, billing and other arrangements that would promote and benefit inter-jurisdictional cooperation.

ARTICLE TWO. PORTABILITY

1. Voucher portability procedures, processes and general administrative practices are set forth in the Operating Procedures.
2. Voucher portability will generally follow the applicable HUD rules and regulations unless modified by an inter-jurisdictional cooperative agreement and applicable authorizations under Atlanta Housing Authority's MTW Agreement.
3. Atlanta Housing Authority will require Participants porting to other jurisdictions to comply with Atlanta Housing Authority's policies, including the work requirement, including the training and program participation components. Atlanta Housing Authority may, at its discretion, waive such requirements for Participants where Atlanta Housing Authority determines that it is not feasible to administer program compliance for such Participants.

PART IX – INSPECTIONS

ARTICLE ONE. QUALITY UNITS

1. Atlanta Housing Authority established and may amend enhanced local standards (“AHA Local Inspection Standards”) periodically to ensure that assisted units offer Participants quality housing in healthy communities. Factors such as levels of concentrated poverty, neighborhood crime, proximity to good neighborhood schools, access to public transportation, and access to retail businesses, among other factors, will be considered. Unit, site, and neighborhood conditions must continue to meet AHA Local Inspection Standards for as long as the assisted unit remains on the Program. It is the goal of the Program to provide opportunities for all Participants to reside in units in neighborhoods that promote and enhance educational and employment goals, good citizenship, and peaceful and cooperative community living.
2. Atlanta Housing Authority policy requires that only Owners/Landlords with quality housing units can participate in the Program. Atlanta Housing Authority, in its discretion, can disapprove the participation of Owners/Landlords with substandard or marginal housing units (including units in areas that do not meet Atlanta Housing Authority site and neighborhood standards) for Program participation.
3. AHA, in its discretion, may develop and implement procedures and practices governing the abatement of housing assistance payments payable to Owners/Landlords in the event a rental unit assisted under the Program fails to comply with the AHA Local Inspection Standards. The procedures and practices established under this policy will be set forth in the Operating Procedures and implemented as a substitute for any applicable HUD rules and regulations.

ARTICLE TWO. PROGRAM MARKETING AND OUTREACH

Atlanta Housing Authority will continue to educate the public about the Program and to foster successful relationships throughout human services organizations, local and state governments, and the business community in order to ensure the availability of quality affordable housing units and family self-sufficiency opportunities for Program participants. This effort includes outreach activities to Owners/Landlords with quality housing units.

ARTICLE THREE. FREQUENCY OF INSPECTIONS

To ensure ongoing compliance with the AHA Local Inspection Standards, Atlanta Housing Authority will inspect all units assisted under the Program prior to occupancy, on a periodic but planned basis and under special circumstances related to health and safety issues and quality assurance measures in accordance with the procedures, processes and general administrative practices set forth in the Operating Procedures.

PART X – BUSINESS RELATIONSHIP BETWEEN ATLANTA HOUSING AUTHORITY AND OWNERS/LANDLORDS

ARTICLE ONE. BUSINESS RELATIONSHIP WITH OWNERS/LANDLORDS

The Housing Choice Rental Assistance Agreement, (“HCRA Agreement”), or any successor or related agreement that Atlanta Housing Authority may develop and implement pursuant to its authorizations under the MTW Agreement, is the controlling agreement that defines the business relationship between Atlanta Housing Authority and Owners/ Landlords.

ARTICLE TWO. LEASE ADDENDUM

The Housing Choice Rental Lease Addendum, (“Lease Addendum”), or any successor or related lease addendum that Atlanta Housing Authority may develop and implement pursuant to its authorizations under the MTW Agreement, is the controlling document that defines business relationship between Participants and Owners/ Landlords with respect to their participation in the Program.

ARTICLE THREE. ENHANCEMENTS TO HCRA AGREEMENT AND LEASE ADDENDUM

Atlanta Housing Authority may develop enhanced versions of the HCRA Agreement and Lease Addendum in order to attract and retain high quality multifamily communities in the Program.

ARTICLE FOUR. BUSINESS RELATIONSHIP PROGRAM PROCEDURES

Atlanta Housing Authority’s Program procedures governing the conduct of the business relationship between Atlanta Housing Authority and Owners/Landlords are set forth in various written communications and guidelines as set forth and directed by the Operating Procedures.

PART XI – REEXAMINATIONS

ARTICLE ONE. REEXAMINATION POLICY

Atlanta Housing Authority will reexamine the income, family composition and program compliance of each Participant on a periodic basis in accordance with the authorizations under the MTW Agreement and as set forth in the Operating Procedures.

ARTICLE TWO. REEXAMINATION PROGRAM PROCEDURES

Atlanta Housing Authority’s Program procedures governing the conduct of reexaminations and Participant obligations and responsibilities are set forth in various written communications and guidelines as set forth and directed by the Operating Procedures.

PART XII - TERMINATIONS

ARTICLE ONE. LEASE TERMINATION

Procedures, processes and general administrative guidelines governing lease terminations by the Owner/Landlord with respect to the Participant and the

resulting termination of the HCRA Agreement are set forth in the Operating Procedures.

ARTICLE TWO. PROGRAM MOVE

A Participant must give written notice to the Owner/Landlord and to Atlanta Housing Authority of intent to move from a unit assisted under the Program pursuant to the terms of the lease between the Participant and the Owner/Landlord and the Participant's obligations under the Program ("Program Move"). The procedures, processes and general administrative guidelines governing Program Moves are set forth in the Operating Procedures. Atlanta Housing Authority may initiate a Program Move due to Owner/Landlord non-compliance with Program requirements; requests for reasonable accommodations; victim protection under the Violence Against Women Act; relocation activities or for other strategic reasons set forth in the Operating Procedures.

ARTICLE THREE. DENIAL AND TERMINATION OF ASSISTANCE

1. Atlanta Housing Authority may deny admission to Applicants or terminate housing assistance benefits of Participants if they or any household member are or have been engaged in criminal activity that could reasonably be expected to indicate a threat to the health, safety or welfare of others.
2. OFFENSES SPECIFICALLY IDENTIFIED BY HUD: Pursuant to 24 CFR §982.553, Applicants may be denied admission if any member of the household:
 - A. Has been evicted from federally assisted housing for drug related criminal activity within the three year period preceding application;
 - B. Is currently engaging in the illegal use of drugs;
 - C. Has ever been convicted of drug-related criminal activity for manufacture or production of methamphetamine on the premises of federally assisted housing;
 - D. Is subject to a lifetime registration requirement under a state sex offender registration program; or
 - E. Is abusing or demonstrates a pattern of abuse of alcohol that may threaten the health, safety, or right to peaceful enjoyment of the premises by other residents.
3. VIOLENT OR DRUG-RELATED OFFENSES

Applicants may be denied admission and Participants may be subject to termination of housing assistance benefits if any member of their households have been convicted of, arrested or under an outstanding warrant for, or reasonably believed to be engaged in any Violent or Drug-Related Offenses. Examples of Violent or Drug-Related Offenses include, but are not limited to the following:

- A. Homicide, Murder, Voluntary manslaughter;

- B. Rape, Sexual Battery, other Aggravated Sex-Related Crimes;
 - C. Child Molestation, Child Sexual Exploitation;
 - D. Drug Charges;
 - E. Kidnapping, False Imprisonment;
 - F. Terrorism;
 - G. Arson;
 - H. Possessing, Transporting or Receiving Explosives or Destructive Devices with the Intent to Kill, Injure, Intimidate, or Destroy;
 - I. Assault and Battery (Simple and Aggravated);
 - J. Trafficking, Distribution, Manufacture, Sale, Use, or Possession of Illegal Firearms;
 - K. Carjacking;
 - L. Robbery;
 - M. Hate Crimes;
 - N. Criminal Damage to Property Endangering Life, Health and Safety;
 - O. Aiding and Abetting in the Commission of a Crime Involving Violence; and
 - P. Other Violent or Drug-Related Offenses that may *Pose a Threat to Public Health and Safety*.
4. OTHER CRIMINAL OFFENSES (Not Violent or Drug-Related)

Applicants may be denied admission if any member of their households have, within the five year period preceding application, been convicted of, arrested or under an outstanding warrant for, or reasonably believed to be engaged in any other criminal offenses that do not involve violence or drugs. Participants may subject to termination of tenancy if any member of their households is convicted of, arrested or under an outstanding warrant for, or reasonably believed to be engaged in any other criminal offenses that do not involve violence or drugs. Examples of Other Criminal Offenses (not violent or drug-related) include, but are not limited to the following:

- A. Child Neglect;
- B. Disorderly Conduct;
- C. Abuse or Pattern of Abuse of Alcohol (to the extent such abuse poses a threat to the health, safety, or peaceful enjoyment of the premises by other residents);
- D. Motor Vehicle Theft;

- E. Burglary, Larceny, Receiving Stolen Goods;
- F. Prostitution and Solicitation of Prostitution;
- G. Vandalism; and
- H. Other Offenses that may Pose a Threat to Public Health and Safety but do not involve Violence or Drugs.

6. OTHER CAUSES FOR DENIAL OF ASSISTANCE OR TERMINATION FROM THE PROGRAM

In addition to the causes outlined in Sections 1-4 of this Article Two, Applicants can be denied assistance and Participants can be terminated from the Program for the following reasons.

- A. An Applicant or Participant who owes rent or other amounts to Atlanta Housing Authority or to another housing agency in connection with Program.
- B. An Applicant or household member, either of whom being a former Program Participant or former public housing resident, who failed to reimburse Atlanta Housing Authority or another housing agency for overpaid assistance or underpaid rent or for any outstanding charges owed to an Owner/Landlord under an assisted lease paid by Atlanta Housing Authority or another housing agency.
- C. An Applicant or Participant who is not in compliance with any of the requirements for selection and continued participation in the Program as set forth in the program application, voucher, program rules, family obligations set forth in the voucher, HCRA Lease Addendum, applicable HUD regulations or this Statement of Housing Choice Policies.

ARTICLE FOUR.

OTHER TERMINATIONS OF HCRA AGREEMENTS AND PARTICIPANT ASSISTANCE

- 1. Atlanta Housing Authority may terminate a HCRA Agreement if the Owner/Landlord is not in compliance with the terms and conditions of the HCRA Agreement and for any other reason set forth in the HCRA Agreement or otherwise allowed by law.
- 2. Atlanta Housing Authority may deny or terminate assistance if Atlanta Housing Authority has reason to believe that a Participant household member has failed to abide by Program rules, regulations, or family obligations. Atlanta Housing Authority shall have the discretion to consider all of the circumstances in each case, including the seriousness of the offense, if the violation is a first offense or a pattern of behavior, the extent of participation by the household member, and the effects that denial or termination would have on the other members of the Participant household not involved in the prescribed activity.

ARTICLE FIVE.

TERMINATION OF ASSISTANCE NOTIFICATION

If Atlanta Housing Authority deems it necessary to terminate assistance, Atlanta Housing Authority will give both the Participant and the Owner/Landlord written termination notices in accordance with the Operating Procedures.

ARTICLE SIX.

INFORMAL REVIEWS AND INFORMAL HEARINGS

1. Applicants may exercise the right to an Informal Review regarding denial of an application for housing assistance or denial of a reasonable accommodation request. Requests for an Informal Review must be made in writing within ten (10) business days from the date of the notice of ineligibility or denial of assistance from the Atlanta Housing Authority. Prior to the Informal Review, a denied Applicant may request an opportunity to examine the application file and to copy any relevant documents at the Applicant's cost. The Informal Review will be conducted by a person appointed by Atlanta Housing Authority who is neither the person who made or approved the decision under review nor the subordinate of such person. Both the Applicant and Atlanta Housing Authority will have the opportunity to present evidence at the Informal Review. The Applicant may bring witnesses, representatives (including attorneys) or letters of support to the Informal Review. In the event Atlanta Housing Authority's representative for the Housing Choice Voucher Program presents any witnesses, the Applicant will have a right to cross-examine them. In the event the Applicant presents any witnesses, the representative from Atlanta Housing Authority will have a right to cross-examine them. Evidence may be considered without regard to admissibility under the rules of evidence applicable to judicial proceedings. An Informal Review decision shall be provided in writing to the Applicant within fifteen (15) business days from the date of the Informal Review. Requests for Informal Reviews, supporting documentation, and a copy of the final decision shall be retained in the applicant's file.
2. Participants may exercise the right to an Informal Hearing to consider whether certain adverse actions that may result in significant reduction or termination of housing subsidy benefits violate the law, HUD regulations (to the extent applicable under MTW) or Atlanta Housing Authority policies. If the termination of assistance is based on criminal activity, Atlanta Housing Authority will provide a copy of the criminal background report at issue and the Participant will be given the opportunity to dispute the accuracy and relevance of the record. Requests for an Informal Hearing must be made in writing within ten (10) business days from the date of the notice of denial or termination of assistance from the Atlanta Housing Authority. Prior to the Informal Hearing, the Participant may request an opportunity to examine the Participant's file and to copy any relevant documents at the Participant's cost. The Informal Hearing will be conducted by a person appointed by Atlanta Housing Authority who is neither the person who made or approved the decision under review, nor the subordinate of such person. Both the Participant and Atlanta Housing Authority will have the opportunity to present evidence at the Informal Hearing. The Participant may bring witnesses, representatives (including attorneys) or letters of support to the Informal Hearing. In the event Atlanta Housing Authority's representative for the Housing Choice Voucher Program presents any witnesses, the Participant will have a right to cross-

examine them. In the event the Participant presents any witnesses, the representative from Atlanta Housing Authority will have a right to cross-examine them. Evidence may be considered without regard to admissibility under the rules of evidence applicable to judicial proceedings. Determinations shall be based on the preponderance of the evidence presented at the Informal Hearing. An Informal Hearing decision shall be provided in writing to the Participant within fifteen (15) business days from the date of the Informal hearing. Requests for Informal Hearings, supporting documentation, and a copy of the final decision shall be retained in the Participant's file.

3. Applicants and Participants with disabilities may request reasonable accommodation in order to participate in the Informal Review/Informal Hearing process, as applicable.

PART XIII – SPECIAL PROGRAMS

ARTICLE ONE. SPECIAL PROGRAMS POLICY

Atlanta Housing Authority, in its discretion, and as a policy matter may develop special programs and initiatives utilizing the regulatory relief and authorizations granted Atlanta Housing Authority under the MTW Agreement that address an identified need and support Atlanta Housing Authority's Vision, Mission and Guiding Principles. Such special programs that Atlanta Housing Authority may pilot utilizing tenant-based assistance solely for the purpose of addressing the local housing needs of at-risk populations shall comply with the applicable provisions of the Statement of Policies for Supportive Housing.

PART XIV - RESPONSE TO FEDERALLY DECLARED DISASTERS

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

ARTICLE ONE. AGENCY-WIDE DISASTER OR OTHER EMERGENCY RELIEF PLANS

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

3. The President and CEO will provide the Board of Commissioners with a full report on a disaster or emergency relief plan implemented pursuant to this Article Seven.

PART XV – PROJECT BASED RENTAL ASSISTANCE

ARTICLE ONE. PROJECT BASED RENTAL ASSISTANCE POLICY

Project Based Rental Assistance, a major business plan priority of Atlanta Housing Authority, was developed pursuant to MTW authorizations for project-basing housing assistance under Section 8 of the 1937 Housing Act, as amended. HUD regulations for the Project-Based Voucher Program at 24 CFR, Part 983 are not applicable to Project Based Rental Assistance.

1. Project Based Rental Assistance, as a business plan component, is administered independent of and separate from the Housing Choice Tenant-Based Voucher Program.
2. Atlanta Housing Authority will not enter into HCRA Agreements for Housing Choice Tenant-Based Vouchers in a property that is under an executed Project Based Rental Assistance Agreement or a written commitment to enter into a Project Based Rental Assistance Agreement, unless authorization is otherwise granted to do so in an executed Project Based Rental Assistance Agreement or a written commitment to enter into a Project Based Rental Assistance Agreement.
3. The implementation and administration of Project Based Rental Assistance, including Fair Housing and Equal Opportunity requirements, site-based administration of all program activities by the owner entity's professional management agent, are set forth in the Atlanta Housing Authority's Administrative Plan Governing Project Based Rental Assistance, as amended, and any successor document adopted by the Atlanta Housing Authority, including any policies and procedures provided to the Owner and/or Owner's Management Agent by the Atlanta Housing Authority for purposes related to the administration of Project Based Rental Assistance. The Owner's management plan and management procedures for operating a property with Project Based Rental Assistance are subject to review and approval by Atlanta Housing Authority pursuant to the Project Based Rental Assistance Agreement for the property.

PART XVI – HOMEOWNERSHIP POLICY

ARTICLE ONE. AUTHORIZATION

The Housing Choice Homeownership Program was first authorized under Section 555 of the Quality Housing and Work Responsibility Act of 1998. Pursuant to the statutory and regulatory relief afforded Atlanta Housing Authority under its MTW Agreement, Section VI.A, paragraph 22 of the Statement of Authorizations authorizes Atlanta Housing Authority to determine the structure, terms and implementation of any homeownership program using Housing Choice Program Vouchers. Accordingly, Atlanta Housing Authority may use Housing Choice Program Vouchers in implementing and administering initiatives to create and promote homeownership opportunities that are consistent with Atlanta Housing Authority's guiding principles and Business Plan priorities.

ARTICLE TWO.

PROGRAM IMPLEMENTATION AND ADMINISTRATION

1. The Housing Choice Homeownership Program will be implemented and administered independent of and separate from the Housing Choice Tenant-Based Voucher Program by a division of the Atlanta Housing Authority designated by the President and Chief Executive Officer.
2. The division designated by the President and Chief Executive Officer is responsible for developing the structure, terms and written procedures for the implementation and ongoing administration of the Housing Choice Homeownership Program in accordance with the authorizations afforded Atlanta Housing Authority under its MTW Agreement.

[END OF SECTION B]

Section C.

Statement of Policies for Supportive Housing

The Housing Authority of the City of Atlanta, Georgia

Statement of Policies for Supportive Housing

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The Housing Authority of the City of Atlanta, Georgia
Statement of Policies for Supportive Housing

PREAMBLE

The Housing Authority of the City of Atlanta, Georgia (“Atlanta Housing Authority” or “AHA”) determined that there was a need to develop housing assistance policies for special needs populations such as the homeless, persons with disabilities, persons with mental health or developmental disabilities, U.S. military veterans, at-risk families and youth and other targeted groups who are enrolled in supportive services programs and who require a stable housing arrangement to ensure the effectiveness of their respective supportive services plans. Based on its past experience and lessons learned through such activities as the Homeless Demonstration Program, Mental Health Demonstration Program and other Supportive Housing initiatives which were implemented as part of the Project Based Rental Assistance program, AHA concluded that typical housing assistance policies and procedures are not always the best fit for supportive service plans and the varying housing needs of the client populations. In order to fill this gap AHA developed the *Statement of Policies for Supportive Housing* (“Supportive Housing Policies”).

PART I - INTRODUCTION

ARTICLE ONE. PURPOSE AND APPLICABILITY

The Supportive Housing Policies set forth certain policies that authorize the establishment of operating procedures for project based rental assistance commitments made by AHA and other rental assistance programs piloted by AHA in connection with and in support of local initiatives developed solely for the purpose of addressing the local housing needs of at-risk populations. The Supportive Housing Policies are not applicable to rental units designated as *special needs* units pursuant to the State of Georgia’s Qualified Allocation Plan under the Low Income Housing Tax Credit program that comprise less than ten percent of the total units in a mixed-income, mixed-finance rental community.

ARTICLE TWO. APPLICABILITY TO AHA’S MOVING TO WORK AGREEMENT

The Supportive Housing Policies are aligned with the Amended and Restated Moving to Work Agreement (“MTW Agreement”), effective as of November 13, 2008, as further amended by the Second Amendment to the Moving to Work Agreement, effective as of January 16, 2009, as may be amended or extended from time to time, by and between the U.S. Department of Housing and Urban Development (“HUD”) and AHA.

1. The MTW Agreement governs and supersedes certain provisions of the United States Housing Act of 1937, as amended, and HUD’s implementing requirements and regulations thereunder, including rules, regulations, contracts, and agreements that have been or will be waived and/or modified by the MTW Agreement. Section VII of Legacy Attachment D of the MTW Agreement authorizes AHA to create its own Housing Choice funded program and develop reasonable policies and processes for providing project based rental assistance.
2. As a Moving to Work agency, AHA will continue to establish, implement and evaluate innovative cost-effective affordable housing strategies that are designed to improve operational efficiencies and help low income families achieve greater economic independence.

3. While recognizing that implementation of various strategic policy initiatives may be immediate, progressive, or refined through various activities and demonstration programs related to special needs populations, the implementation of those policy initiatives, not immediately enumerated in AHA's MTW Annual Plan, may be advanced, provided that such policy initiatives are consistent with the Supportive Housing Policies and the spirit and intent of the authorizations under the MTW Agreement.
4. AHA's President and Chief Executive Officer, as vested by the Board of Commissioners, can authorize revisions, as appropriate, to the Supportive Housing Policies in order to clarify the original intent of any policy enumerated herein without the prior approval of the Board of Commissioners, provided that any such revision does not materially change the original intent of any policy. Any significant material changes must be approved by the Board of Commissioners.

ARTICLE THREE. SUPPORTIVE HOUSING OPERATING PROCEDURES

1. Project Based Rental Assistance ("PBRA") is an initiative designed and implemented by AHA using its flexibility authorized under its MTW Agreement.
2. PBRA policies were formerly included in a subsection of AHA's *Statement of Policies Governing the Housing Choice Tenant-Based Program* ("Housing Choice Policies") until AHA's Board of Commissioners adopted a revision to the Housing Choice Policies on September 3, 2008 to separate PBRA from the Housing Choice program and authorize AHA to develop operating procedures for the implementation and administration of PBRA as a separate program as set forth in the Administrative Plan Governing Project Based Rental Assistance.
3. AHA's Supportive Housing Policies utilize similar operating procedures as those used in AHA's Project Based Rental Assistance program; however, occupancy arrangements, rent determinations, rules regarding continuing assistance and other considerations relating to the special needs of the populations being served will be tailored to various program needs and requirements of the service providers and other professionals operating in the communities to ensure success for participants, service providers, property owners, funders and AHA ("Supportive Housing Operating Procedures").
4. In the event that there is a conflict between PBRA operating procedures and the Supportive Housing Operating Procedures established under the Supportive Housing Policies, then the Supportive Housing Operating Procedures shall govern.
5. A PBRA unit subject to the Supportive Housing Policies and Supportive Housing Operating Procedures is a supportive housing PBRA unit ("Supportive Housing PBRA Unit").

ARTICLE FOUR. SUPPORTIVE HOUSING PARTICIPANT

An eligible family or person who meets the qualifications for admission to and occupancy of an available Supportive Housing PBRA Unit in accordance with the Supportive Housing Policies shall be deemed a participant ("Supportive Housing Participant").

ARTICLE FIVE. SERVICE PROVIDER

A service provider is a qualified organization that has been approved to provide specialized supportive services to Supportive Housing Participants pursuant to Part IV, Article One of the Supportive Housing Policies (“Service Provider”).

ARTICLE SIX. SERVICE COORDINATOR

The service coordinator is an organization responsible for developing local strategies for assisting special needs populations, working with public/private resources to identify and/or providing funds for service delivery activities, approving and coordinating Service Providers engaged in specialized supportive services and determining their status as approved Service Providers based on performance, and promoting community engagement and other related activities (“Service Coordinator”). AHA may enter into an agreement with one or more Service Coordinators in connection with AHA’s support of one or more Supportive Housing programs and initiatives (“Service Coordinator Agreement”) as described herein under Part IV, Article Three. In certain other Supportive Housing programs and initiatives that may be proposed to AHA, AHA, in its discretion, may not require a Service Coordinator and determine that the most effective approach in such cases would be to work directly with service providers, property owners and/or funders.

ARTICLE SEVEN. FAIR HOUSING AND EQUAL OPPORTUNITY

AHA adheres to and supports all applicable Federal and State nondiscrimination and fair housing laws and applicable HUD regulations in all housing and program activities. AHA monitors fair housing and equal opportunity compliance at all of the communities governed by the Supportive Housing Policies.

1. AHA acknowledges the protections afforded victims under the *Violence Against Women Act*, and will require owners to include administrative measures to address those protections in their operating procedures, as applicable.
2. AHA acknowledges the importance of serving persons with Limited English Proficiency (LEP). The extent to which it is determined that a significant number or proportion of the population residing in Supportive Housing PBRA Units is comprised of LEP persons, AHA will require owners to develop and implement a LEP Plan to address the needs of such persons, as appropriate and in consideration of the cost and availability of resources that would be needed to provide translation services to LEP persons.
3. Owners of Supportive Housing PBRA Units shall assist Supportive Housing Participants with disabilities in accordance with such federal laws, rules and regulations that are applicable to PBRA site-based administration in accordance with the Supportive Housing Policies including, but not limited to application procedures, admission, unit transfer and occupancy requirements, and procedures related to the acceptance, processing and disposition of reasonable accommodation requests.
4. When the Owner is a faith-based organization, the lease between the Supportive Housing Participant and the Owner (“Lease”) and/or approved supportive services plan (“Service Plan”), as developed by the Service Provider, cannot require the Supportive Housing Participant’s involvement in religious activities.

ARTICLE EIGHT. DECONCENTRATION

In order to realize its corporate vision of Healthy Mixed-Income Communities/Healthy Self-Sufficient Families, AHA is pledged to outcomes that lead to the deconcentration of poverty.

1. In its discretion, AHA may develop a comprehensive deconcentration strategy that would place limitations on the occupancy of assisted households in high poverty areas within the City of Atlanta with the goal and intent of reducing high poverty concentrations.
2. AHA has the authority under its MTW Agreement to pursue locally driven policies, procedures and programs with the aim of developing better, more efficient and effective ways of providing quality, residential communities to low income families.
3. AHA will ensure that the placement of Supportive Housing PBRA Units in residential communities will be sensitive and thoughtful in addressing community standards while promoting the unique requirements of Supportive Housing Participants.

ARTICLE NINE. FRAUD AND MISREPRESENTATION

1. Supportive Housing Participants are required to provide truthful, complete information relating to program participation, supportive service provider requirements, all sources of income, family composition, and all relevant family background information in order to qualify for initial eligibility and continued participation.
2. Supportive Housing Participants who engage in acts of fraud and misrepresentation are subject to loss of PBRA benefits and prosecution under State and Federal laws, and where appropriate, will be referred for prosecution by AHA.
3. A Supportive Housing Participant who has made any misrepresentation or engaged in acts of fraud at the time of admission, during any subsequent recertification, or at any other time shall be denied admission or be subject to termination by the owner, as applicable.

PART II – PROPOSAL SELECTION AND SITE-BASED ADMINISTRATION

In addressing the housing issues of special needs populations, AHA uses PBRA as a development tool and financial incentive for private developers and owners to expand the availability of new or existing high quality Supportive Housing PBRA Units.

ARTICLE ONE. PROPOSAL SELECTION

AHA will periodically solicit developers/owners (“Owner”) for new construction, rehabilitation and existing properties who are interested in providing Supportive Housing PBRA Units.

1. AHA will comply with its established procurement protocols for Request for Proposals (RFP) to solicit proposals for Supportive Housing PBRA Units from interested Owners (“Owner Proposal”).

2. The details and scope of requirements for the preparation of Owner Proposals will be outlined in the RFP for Supportive Housing PBRA Units.
3. Owner Proposals for Supportive Housing PBRA Units will be selected in accordance with the evaluation criteria set forth in the RFP.
4. Upon approval of a selected Owner Proposal by the AHA Board of Commissioners, AHA will issue a PBRA commitment to the Owner that will expire on a date certain as set forth in the commitment ("PBRA Commitment"). The PBRA Commitment shall acknowledge that AHA will provide Supportive Housing PBRA Units contingent upon the Owner fulfilling the terms and conditions set forth in the PBRA Commitment with respect to the Owner's Proposal. The Owner's failure to meet the terms and conditions before the expiration date of the PBRA Commitment will result in the automatic termination of the PBRA Commitment unless AHA, in its discretion extends the term of the PBRA Commitment.
5. Upon fulfilling the Owner fulfilling the terms and conditions of the PBRA Commitment, as determined by AHA, AHA and the Owner will enter into a PBRA Agreement for Supportive Housing PBRA Units ("Supportive Housing PBRA Agreement").

ARTICLE TWO. SUPPORTIVE HOUSING PBRA AGREEMENT

Because AHA does not own or control the Owner's Supportive Housing PBRA Units, the Owner shall be responsible for leasing, operating and maintaining the Supportive Housing PBRA Units in accordance with the Supportive Housing PBRA Agreement and Supportive Housing Policies.

1. The Owner shall execute AHA's form of Supportive Housing PBRA Agreement.
2. The term of the Supportive Housing PBRA Agreement shall be two years, unless AHA, in its discretion, approved a longer term in its PBRA Commitment to the Owner.
3. The Owner and Service Provider shall enter into a service provider agreement in a form approved by AHA ("Service Provider Agreement"). An executed copy of the Service Provider Agreement shall be an exhibit to the Supportive Housing PBRA Agreement.
4. The provisions controlling the business relationship between AHA and the Owner shall be outlined in the Supportive Housing PBRA Agreement including, but not limited to, the Owner's obligations related to selecting and entering into an agreement with a qualified Service Provider, site-based administration and other management obligations with respect to the operation of the Supportive Housing PBRA Units, the subsidy arrangement between the Owner and AHA and the submission of reports, as required by AHA, including evaluations and resolution of issues with respect to the performance of the Service Provider in discharging its duties pursuant to the Service Provider Agreement.

ARTICLE THREE. OWNER'S OPERATING PROCEDURES

The Owner is responsible for developing and implementing written operating procedures for communities with Supportive Housing PBRA Units ("Owner's Operating Procedures").

1. The Owner's Operating Procedures must be consistent with the Supportive Housing Policies and Supportive Housing Operating Procedures, and to the requirements of other funding sources and Service Provider Agreements. To the extent that the Service Coordinator, funding sources and Service Providers have special requirements regarding the occupancy and conduct of Supportive Housing Participants with respect to their Service Plans, such requirements must be included in the Owner's Operating Procedures.
2. The Owner's Operating Procedures must describe how Supportive Housing Participants are selected and admitted into Supportive Housing PBRA Units in coordination with the Service Provider and as may be further provided for in the Service Provider Agreement. The selection of qualified Supportive Housing Participants shall be made by the Service Provider in consultation with the Owner and in accordance with the provisions of the Service Provider Agreement. Qualified Supportive Housing Participants shall be placed on the Supportive Housing PBRA site-based waiting list that the Owner maintains and administers in an equitable and consistent manner. The Owner must maintain records regarding the selection and admission of Supportive Housing Participants and make such records available to AHA upon AHA's request.
3. The Owner's Operating Procedures are subject to review by AHA in order to ensure consistency with the intent of the Supportive Housing Policies.

ARTICLE FOUR. RENT DETERMINATIONS

AHA will follow the rent determination procedures established for the PBRA program in setting the rents for Supportive Housing PBRA Units. When setting rents for single-room occupancy and congregate housing arrangements, AHA will take into consideration the weighted value of shared facilities and amenities.

ARTICLE FIVE. TRAINING

Owners, Service Providers and property management staff who are responsible for the operation of the Supportive Housing PBRA Units and the delivery of supportive services to Supportive Housing Participants are required to attend AHA-organized and/or AHA-sponsored training sessions regarding Supportive Housing Policies, Supportive Housing Operating Procedures, site-based administration, Owner/Services Provider coordination and other related matters.

PART III - ADMISSION AND RESIDENCY REQUIREMENTS

Supportive Housing Participants must comply with all Supportive Housing Policies related to their admission to and residency of Supportive Housing PBRA Units.

ARTICLE ONE. SUPPORTIVE HOUSING ELIGIBILITY REQUIREMENTS

1. The Service Provider shall determine the initial and ongoing eligibility of a family or person as a qualified Supportive Housing Participant for referral to the Owner's site-based waiting list and placement in a Supportive Housing PBRA Unit pursuant to the Supportive Housing Policies and the Service Provider Agreement between the Owner and Service Provider.

2. Each Supportive Housing Participant must have a written Service Plan prepared by the Service Provider that documents the Supportive Housing Participant's agreement to comply with the terms and conditions of the Service Plan.
3. In lieu of AHA's work/program requirements, Supportive Housing Participants must remain in compliance with their Service Plans. Service Providers will maintain a written record of each Supportive Housing Participant's progress in fulfilling Service Plan goals.
4. Supportive Housing Participants must qualify as very-low income members of one or more special needs populations such as the homeless, persons with disabilities, persons with mental health or developmental disabilities, U.S. military veterans, at-risk families and youth and other targeted groups who are enrolled in a supportive services program with a Service Provider and who require a stable housing arrangement to ensure the effectiveness of their respective Service Plans.
5. AHA shall establish reasonable program integrity and audit procedures to ensure that the selection, admission and occupancy oversight of Supportive Housing Participants in Supportive Housing PBRA Units are being performed in accordance with the Supportive Housing Policies.

ARTICLE TWO. OCCUPANCY ARRANGEMENTS

Due to the varying housing and service delivery needs of special needs populations, the building format and configuration of Supportive Housing PBRA Units may also vary.

1. Supportive Housing Participants may occupy Supportive Housing PBRA Units in shared housing, single-room occupancy and congregate housing arrangements with shared facilities and amenities.
2. Under the supervision of the Service Provider and in accordance with individual Service Plans, two or more unrelated Supportive Housing Participants may share a single unit provided the number of persons occupying the Supportive Housing PBRA Unit is in compliance with AHA's occupancy standards established for the PBRA program.

ARTICLE THREE. DENIAL OF ADMISSION AND TERMINATION OF ASSISTANCE

1. Owners of Supportive Housing PBRA Units may deny admission or terminate PBRA assistance to a Supportive Housing Participant if it is determined that a Supportive Housing Participant has been or is engaged in a violent criminal activity that could reasonably be expected to be an immediate threat to the health, safety or welfare of others.
2. Pursuant to HUD requirements, Owners of Supportive Housing PBRA Units may deny admission or terminate PBRA assistance to a Supportive Housing Participant if it is determined that such Supportive Housing Participant:
 - A. Has been evicted from federally assisted housing for drug related criminal activity within the three year period preceding application;
 - B. Is currently engaging in the illegal use of drugs;
 - C. Has ever been convicted of drug-related criminal activity for manufacture or production of methamphetamine on the premises of federally assisted housing;

- D. Is subject to a lifetime registration requirement under a state sex offender registration program; or
 - E. Is abusing or demonstrates a pattern of abuse of alcohol that may threaten the health, safety, or right to peaceful enjoyment of the premises by other residents.
3. Consistent with the intent of Supportive Housing, the Owner and Service Provider may determine to mitigate factors in a Supportive Housing Participant's history through the provisions set forth in such participant's Service Plan.
 4. Notwithstanding the above, Owner retains all rights to terminate assistance for any Supportive Housing Participant who is in noncompliance with the terms and conditions of the lease agreement between Owner and Supportive Housing Participant.

ARTICLE FOUR. TERM OF RENTAL ASSISTANCE

1. Supportive Housing Participants are eligible for rental assistance for as long as they are a resident of an approved Supportive Housing PBRA Unit and continue to comply with the terms and conditions of the Owner's lease agreement and the provisions of the service plan developed by the participant's designated Service Provider.
2. In the event that a Supportive Housing Participant voluntarily moves from the Supportive Housing PBRA Unit or is evicted by the Owner for cause, the rental assistance for such Supportive Housing Participant shall terminate and shall not be transferable.
3. In the event that a Supportive Housing Participant voluntarily withdraws from the care of the Service Provider or fails to comply with the terms and conditions of the Service Plan which results in the participant's removal from the Service Provider's care, the rental assistance for such Supportive Housing Participant shall terminate and shall not be transferable.
 - A. A determination relating to a former Supportive Housing Participant's continued occupancy as an unassisted resident shall be made in accordance with the terms of the Lease and the Service Plan.
 - B. When the rental assistance is terminated for a Supportive Housing Participant in a shared, single-room occupancy or congregate housing Supportive Housing arrangement, the former Supportive Housing Participant must move from the unit in accordance with the terms and conditions of the Lease and Service Plan for such Supportive Housing arrangements.
4. Upon termination or nonrenewal of a Supportive Housing PBRA Agreement, the rental assistance for all Supportive Housing Participants covered by the agreement shall terminate and shall not be transferable.

PART IV - SERVICE PROVIDER ARRANGEMENTS

The Owner and the Service Provider must enter into a Service Provider Agreement that remains active and is fully funded throughout the term of the Supportive Housing PBRA Agreement.

ARTICLE ONE. APPROVAL OF THE SERVICE PROVIDER

In order to provide supportive services to Supportive Housing Participants in Supportive Housing PBRA Units, a Service Provider must be approved by either the Service Coordinator, AHA when there is no Service Coordinator or a state or local agency authorized to make such approvals. If the Service Provider is approved by an authorized state or local agency, the Service Provider shall be required to provide evidence of such approval to the Service Coordinator or AHA when there is no Service Coordinator. When there is a Service Coordinator, the Service Coordinator will ensure that the Service Provider is qualified to provide specialized supportive services geared to the needs of Supportive Housing Participants. The Service Coordinator shall provide a list of approved Service Providers to AHA on a periodic basis or upon AHA's request.

ARTICLE TWO. SERVICE DELIVERY COORDINATION

The Owner and Service Provider shall coordinate the delivery of services to Supportive Housing Participants in Supportive Housing PBRA Units. When there is a change in the status of a Supportive Housing Participant, the Owner shall notify AHA and the Service Provider shall notify the Service Coordinator and AHA.

ARTICLE THREE. SERVICE COORDINATOR AGREEMENT

1. AHA may enter into a Service Coordinator Agreement with one or more Service Coordinators in connection with AHA's support of one or more Supportive Housing programs and initiatives.
2. The Service Coordinator Agreement shall set forth the obligations of the Service Coordinator to approve, monitor and evaluate the performance of Service Providers and AHA's role as a subsidy provider for Supportive Housing.
3. Pursuant to the Service Coordinator Agreement, the Service Coordinator shall:
 - A. Ensure that Service Providers are qualified to provide specialized supportive services geared to the needs of Supportive Housing Participants.
 - B. Provide a list of such approved Service Providers to AHA on a periodic basis or upon AHA's request.
 - C. Provide periodic progress reports to AHA regarding the performance of Service Providers in serving the needs of Supportive Housing Participants.
4. AHA and the Service Coordinator will mutually agree on the terms and conditions to be set forth in the Service Coordinator Agreement including provisions for the termination of said agreement.

[END OF SECTION C]