



THE HOUSING AUTHORITY OF COLUMBUS, GEORGIA

MOVING TO WORK DEMONSTRATION

YEAR ONE PLAN

**FY2014 Annual Plan
JULY 1, 2013 – JUNE 30, 2014**

Originally submitted: June 27, 2012

Resubmitted: April 12, 2013

Revised: July 23, 2013

Approved: July 31, 2013



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, D.C. 20410-5000

JUL 31 2013

PUBLIC AND INDIAN HOUSING

Mr. J. Len Williams
Chief Executive Officer
Housing Authority of Columbus, Georgia
1000 Wynnton Road
P.O. Box 630
Columbus, GA 91902

Subject: Approval of FY 2014 Annual Moving to Work Plan

Dear Mr. Williams:

The U.S Department of Housing and Urban Development (HUD) has completed its review of the Housing Authority of Columbus Georgia's (HACG) Annual Moving to Work (MTW) Plan, which was submitted as part of HACG's MTW Application on June 27, 2012, with revisions provided on April 12, 2013, and July 25, 2013. I am pleased to inform you that the revised Plan is approved. The effective dates of the Plan are August 1, 2013, through June 30, 2014.

During HUD's review of the initial Plan submission, HUD and HACG discussed the applicability of certain MTW authorizations for each proposed activity. As HACG moves forward with implementing the activities set forth in this Plan, HACG is reminded that it only has flexibility to use the cited authorizations from Attachments C and D of the MTW Agreement to the extent described in the approved MTW Plan. Thus, if HACG makes changes to its implementation plans, it should discuss these changes with HUD to ensure the correct authorizations are cited and that the uses of these authorizations are described at an adequate level of detail in the MTW Plan.

Please note that while HUD is supportive of HACG's efforts, this approval does not necessarily constitute an endorsement of any particular policies described in the Plan. In providing assistance to families under programs covered by this Plan, HACG must comply with the rules, standards and policies established in the Plan. Also, the approved Plan and all required attachments and documents should be available for review and inspection at HACG's principal office during normal business hours.

If you have any questions, please contact Laurel Davis, your MTW Coordinator, at (202) 402-5759.

Sincerely,

Ivan Pour
Moving to Work Program Director
Office of Public Housing Investments

cc: Clamentine Melvin, Atlanta Field Office

TABLE of CONTENTS

SECTION	TITLE	PAGE
I.	Introduction	3
II.	General Housing Authority Operating Information	8
III.	Non-MTW Related Housing Authority Information	13
IV.	Long-Term MTW Plan	14
V.	Proposed MTW Activities: HUD Approval Requested	17
	• Activity One – Community Choice	17
	• Activity Two – Innovations to Reduce Homelessness	22
	• Activity Three – Administrative Reforms	26
	• Activity Four – Administrative Efficiencies	29
	• Activity Five – Streamlined HQS Inspections	33
	• Activity Six – Rent Reform	36
VI.	Ongoing MTW Activities – Not Applicable	42
VII.	Sources and Uses of Funding	43
VIII.	Administrative	46
IX.	In Plan Appendix: Planned Sources and Uses by AMP	50
X.	Appendix	51
	A. Status Report of Strategic Plan	52
	B. Self-Certification Form – Assets	60
	C. Self-Certification Form – Inspections	61
	D. Incentive Policies	
	1. Childcare	62
	2. Employment Stipend	64
	3. Transportation	66
XI.	Attachments: Public Hearings	68
	1. Public Notice	69
	2. Sign-in Sheets	75
	3. Board Resolution	88

SECTION I. INTRODUCTION

OVERVIEW OF THE MTW GOALS AND OBJECTIVES

This Plan is the culmination of many years of laying the foundation for innovation at the Housing Authority of Columbus, Ga. (HACG). We have reached a point where it is time to transform the successful management of our public housing and voucher programs by testing and evaluating some truly creative, but replicable, pilot initiatives.

We want to provide more choices and incentives for our ‘traditional’ customers in Columbus, but also to address the needs of other populations such as the homeless and military residents and veterans. Given our proximity to Fort Benning and other installations that are grappling with the continuing mental, emotional, and physical problems of those returning from wars in Iraq and Afghanistan, plus other engagements involving terrorism; we are proposing a special program in line with the ideas of HUD, the VA, the White House, the national homelessness agencies, and foundations who are addressing this issue. It would also involve other MTW agencies with similar installations. HACG believes that HUD’s Moving to Work program will harness the full energies of the Greater Columbus community in a way that we have not seen before. With the addition of the waivers allowed under MTW, we can move our innovations a giant leap further. It will be an exciting moment for us and hopefully, for the rest of the country, to observe and replicate as appropriate.



HACG is known as a high performer and an innovator in the industry. We are willing to operate at the leading edge of change, to experiment with new tools and to innovate where others see only obstacles. We have been leaders in thinking with the industry about reform of public housing and have a distinguished list of “among the first” accomplishments that have helped our industry grow.

This Plan achieves a balance between local and national partners and between rigorous testing and knowing when to take stock and acknowledge known outcomes. It is also a balance between early implementation of initiatives and doing the necessary planning and partnering to achieve sustainable outcomes over time. We also intend to look at what others have done and build on their efforts, while designing and implementing innovations based on our own thinking and local conditions.

HACG's MTW proposal builds on many organizational strengths, as well as challenges.

STRENGTHS:

- HACG has a long history of successful collaboration and partner-based housing. It has worked with such entities as:

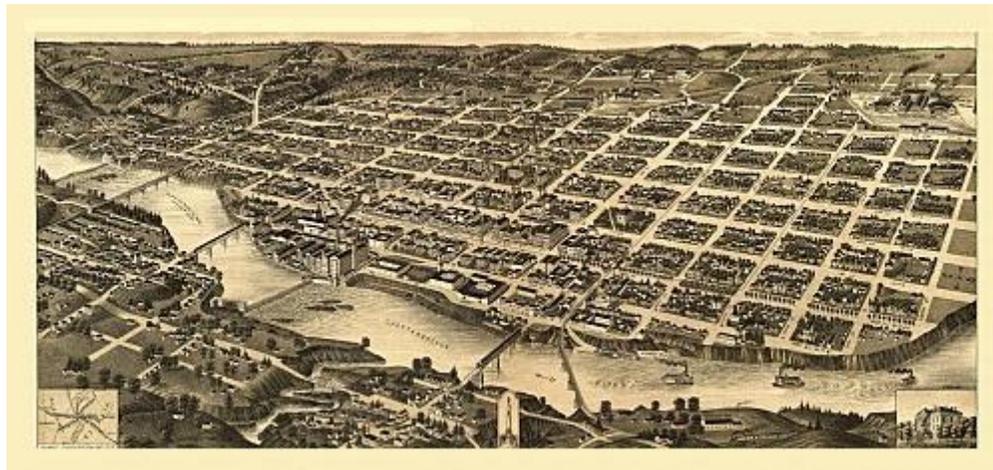
Adult Protective Services	Alcoholics Anonymous
Area Agency on Aging	Babies Can't Wait (Health Dept.)
Big Brothers/Big Sisters	Boy Scouts
Boys and Girls Club	Bradley Library
Bridge Program	C.V. Episcopal Ministry
Children, Youth & Family Connection	Child Support Recovery
Children's Tree House	Columbus Bank & Trust Co.
Columbus Chamber of Commerce	Columbus Consolidated Government
Columbus Crime Prevention	Columbus Health Department
Columbus Community Reinvestment	Columbus Parks & Recreation
Columbus Marshall's Office	Columbus Regional Healthcare
Columbus Sheriff's Department.	Columbus State University
Columbus Technical College	Consumer Credit Counseling
CONTACT (211)	Damascus Way (Valley Rescue)
Dept. of Juvenile Justice	Dept. of Family & Children Services
Energy Assistance Program (ESP)	Enrichment Services
Experience Works	Family, Youth & Children Coalition
Feeding the Valley Food Bank	FNMA
GA Dept. of Human Resources	GA Dept. of Labor
GA Extension Services	GA Legal Services
Girl Scouts	Girls, Inc.
Goodwill Industries	Habitat for Humanity
Head Start (ESP)	Homeless Resource Network
Hope Harbor	Innovative Work Solutions
Literacy Alliance	Agency on Aging
Committee for Persons w/Disabilities	METRA Transit
Mission Columbus	Muscogee County School District
NAACP	Narcotics Anonymous
NeighborWorks Columbus	New Horizons
Open Door Community House	Pastoral Institute
Project Rebound	Safe Kids
SaMarc Foundation	Salvation Army
SOURCE Care Mgmt.	Social Security Administration
St. Francis Hospital	Three Rivers Health Education
UGA Cooperative Extension Service	United Way
Urban League	Valley Health Care
Valley Rescue Mission	Voc-Rehab Services
WIC Program	Workforce Investment Program
YMCA	

- HACG has also sought out high-quality partners for its development teams and these have included Integral Properties, Columbus Housing Initiatives Inc., Boulevard Group, Wallace Roberts & Todd; Columbia Residential; JHP Architects; Wallace + Perdomo; Duvernay + Brooks.
- We have already identified a number of other partners for the purposes of this application including: the National Alliance to End Homelessness; Home Depot Foundation; Columbus Community Foundation; the National Academy of Housing and Sustainable Communities; Veterans' Administration; and Fort Benning.
- Columbus Consolidated Government, through its FY2012 - FY2016 Consolidated Plan and the Department of Community Reinvestment, has as its highest priority "to improve the condition, availability and accessibility of affordable housing," in line with the goals of HACG and MTW. The City established a community goal of having 10% of its housing inventory permanently affordable, and it supports that goal with funding from HOME funds through a Deferred Loan program. It will also continue funding its Community Housing Development Organization (CHDO), NeighborWorks.
- The City also rates the reduction of homelessness as a high priority and will continue funding its Homeless Task Force Coordinator to create the Continuum of Care Application and assist in coordinating homeless resources.
- Enhancing the physical condition of Columbus neighborhoods is another high priority for the Columbus Consolidated Government. Through the use of CDBG funds, the City will conduct inspections and rehabilitate owner-occupied homes.
- There are no MTW agencies in HUD Region IV addressing the military population, especially the homeless, according to the national organization formed to address that problem. We can provide a national replicable model.
- HACG was awarded a 2002 HOPE VI grant for \$20 million to revitalize George Peabody Apartments, its most distressed community. Consisting of 510 units, built in 1940, it had become severely distressed. Today, it has been replaced by 39 off-site homes, a new mixed-income community on-site with 40% public housing assisted residential units of the total 367 units.
- Newton Baker Village was another dilapidated housing development of 590 units, originally constructed as military housing in 1940. HACG demolished these and replaced them with a new mixed-income community of 416 units.
- HACG also works through its non-profit entity, CSG Properties Inc., owners/operator of market rate affordable housing and subsidized housing communities.
- HACG's CEO has been very active in both industry and community decision-making circles. At home, he is a member of the Rotary service club and attends many civic functions and meetings to make HACG's presence felt. He has served on the boards of United Way, Columbus South, House of Mercy, Muscogee Educational Excellence Foundation, Goodwill Industries of the Southern Rivers, and serves as Ex Officio at Midtown, the Historic Columbus Foundation, and the Greater Columbus Chamber of Commerce. It will also be helpful when it comes to reaching out to community business and civic leaders for their support of this application. Nationally, he serves as Chairman of the Housing Authority Insurance Group and is a Trustee of the Public Housing Authorities Directors Association (PHADA).

A critical component of this re-engineering has been HACG's readiness to identify, in a timely manner, strategic partners who could ensure that its most distressed communities are repositioned into a sustainable mixed-use, mixed income Columbus neighborhood (see next section for more details).



Columbus is a city in and the county seat of Muscogee County, Georgia, with which it is consolidated. As of the 2010 census, the city had a population of 189,885, with the metropolitan area having, in 2009, an estimated population of 292,795. It joins with the Auburn, Alabama, metropolitan area to form the Columbus-Georgia-Auburn, Alabama Combined Statistical Area (SMSA), which, in 2009, had an estimated population of 450,467. It is the third largest city and fourth largest metropolitan area in the State, and also the 123rd largest city in the United States.



Columbus lies 100 miles south of Atlanta. Fort Benning, a major employer, is located south of the city in Chattahoochee County. The city was ranked number 4 on the 100 Best U.S. Cities to Raise a Family by *Best Life Magazine*. Columbus is divided into five geographic areas, and they are as follows:

- **Downtown** (also called "Uptown") is the city's central business district, and home to many historic districts, homes, and churches such as the Columbus Historic Riverfront Industrial District, the Mott House, and the Church of the Holy Family. It is considered by some to be the area bounded on the north by Talbotton Road; on the South by 30th Avenue; on the West by Front Avenue and the Chattahoochee River; and on the East by Brown Avenue.
- **East Columbus** is the largest of the five Columbus areas. It is home to Bull Creek Golf Course, the largest of seven golf courses in the city. The area is roughly bounded by Macon Road to the North, Buena Vista Road to the South, Schatulga Road and Fort Benning to the East, and I-185 to the West.
- **Mid-Town** is a residential and commercial area. It is home to two major shopping areas: Peachtree Mall, an indoor shopping mall opened in 1975; The Landings, an outdoor strip mall that opened in 2005. Mid-Town is also home to the majority of bars and nightclubs in the Columbus area. It is bounded roughly by I-185 to the East, J. R. Allen Parkway to the North, River Road to the West and Wynnton Road to the South.
- **North Columbus** is a diverse suburban area of the city that is home to established neighborhoods and newly built subdivisions. It is home to very upscale areas such as Green Island Hills. It is also home to Columbus Park Crossing, a major outdoor strip mall. It is bounded roughly by Moore Road to the North, Manchester Expressway to the South, Moon Road to the East, and J.R Allen Parkway to the West.
- **South Columbus** is situated just below Mid-Town. It is home to the National Infantry Museum, a museum that honors the history of infantry forces in the U.S. Army. The South Columbus area has a noticeably higher military population than other areas, most likely because it is located just above the United States Army post Fort Benning.

Columbus is Georgia's first consolidated government (1971), and serves as a model for other local governments across the nation, with a very high level of citizen services at a very low per capita cost.

CHALLENGES:

- The reduction of funding at the local, State, and Federal levels will significantly limit the resources available to meet the needs of low and moderate income residents. With diminished resources, HACG, the City, and non-profit organizations will have great difficulty serving all persons who are in need of services. Regulatory flexibility is essential to our effort to make scarce funds go farther.
- As the population of Columbus continues to grow and public transportation strains, limitations on affordable housing will become a major barrier to the local economy. An increased rate of foreclosures in the City has also increased the need to provide affordable rental housing.
- Columbus has a large military population. The lessons we learn about working with this unique population towards affordable homeownership or rental housing and self-sufficiency will be very helpful to the national dialogue.

SECTION II. GENERAL HOUSING AUTHORITY OPERATING INFORMATION

A).Housing Stock Information:

1. Number of Public Housing Units at the Beginning of the Year

AMP No. / Project No.	Property Name / Address	No. of Units	Studio	1 - BR	2 - BR	3 - BR	4 - BR	5 - BR	Special Use Units
HACG PUBLIC HOUSING SITES									
AMP 1 GA004000402	Booker T. Washington 500 5th Avenue	392	-	155	142	94	-	-	1
AMP 2 GA004000405	Warren Williams / Rivers 1200 W. Williams Road / 1050 Adair Avenue	184	-	40	102	39	-	-	3
AMP 3 GA004000406	Luther C. Wilson 3400 8th Avenue	289	-	51	145	68	20	4	1
AMP 4 GA004000407	Louis T. Chase 120 20th Street	108	-	14	47	35	12	-	-
AMP 5 GA004000408	Elizabeth E. Canty 100 20th Avenue	249	-	41	125	70	10	2	1
AMP 6 GA004000410	Farley Homes 1901 Nina Street	102	-	-	22	66	14	-	-
AMP 7 GA004000412	Nicholson Terrace 1313 14th Street	100	28	71	1	-	-	-	-
AMP 8 GA004000416	E. J. Knights 3610 Youman Street 3811 Baker Plaza Drive	92	-	40	52	-	-	-	-
AMP 9 GA004000418	Ashley Station I & II (Mixed)	146	-	81	54	11	-	-	-
AMP 10 GA004000420	Arbor Pointe I (Mixed)	18	-	4	10	4	-	-	-
AMP 11 GA004000421	Arbor Pointe II (Mixed)	18	-	4	10	4	-	-	-
AMP 12 GA004000422	Arbor Pointe III (Mixed)	19	-	19	-	-	-	-	-
TOTAL HACG PUBLIC HOUSING		1,717	28	520	710	391	56	6	6
HACG OTHER ASSISTED SITES									
Project 600	Columbus Villas (Project Based Multi-family)	88	-	12	64	12	-	-	-
Project 630	Willow Glen (Project Based Vouchers)	28	-	28	-	-	-	-	-
Project 420	Arbor Pointe I (Project Based Vouchers)	75	-	15	45	15	-	-	-
Project 421	Arbor Pointe II (Project Based Vouchers)	75	-	15	45	15	-	-	-
Project 422	Arbor Pointe III (Project Based Vouchers)	101	-	101	-	-	-	-	-
TOTAL HACG OTHER ASSISTED HOUSING		367	-	171	154	42	-	-	-
GRAND TOTAL HACG HOUSING		2,084	28	691	864	433	56	6	6

2. General Description of any planned significant Capital Expenditures by development (>30% of the Agency’s Total Budgeted Capital Expenditures for the Fiscal Year)

Farley Homes facade renovations (expected to be completed in early FY2014)

- a. HUD Approved Operating Reserves - \$339,190
- b. CFP 2010 - \$398,020
- c. CFP 2011 - \$1,064,806

2012 CFP grant expenditures for FY2014 include BTW Development Activities: Playground equipment (Wilson, Canty, and Chase); Sewer line replacement (Canty and Warren Williams); Interior site office upgrade (Warren Williams); Sidewalks (Wilson); Fencing (Farley); Interior paint and furniture replacement (Nicholson Terrace); and Signage (various sites). The majority of the 2013 and 2014 CFP grant funds are allocated to BTW development activities.

3. Description of any New Public Housing units to be added during the year by development (specifying bedroom size, type, accessible features, if applicable):

HACG does not plan to add any New Public Housing units during FY2014.

4. Number of Public Housing units to be removed from the inventory during the year by development specifying the justification for the removal:

HACG does not plan to remove any public housing units from the inventory.

5. Number of MTW Housing Choice Vouchers (HCV) units authorized:

HACG has 2,333 MTW Housing Choice Vouchers (HCV) units authorized.

6. Number of non-MTW HCV units authorized:

HACG does not have any non-MTW HCV units authorized.

7. Number of HCV units to be Project-based during the Plan Year, including description of each separate project:

HACG proposes a mobility study (Activity One – Community Choice) in which it plans to publish a Request for Proposals (RFP) for approximately 20 project based units. These units will be located in a low poverty area and the vouchers will be part of HACG’s existing voucher program (no new vouchers are requested). If no acceptable proposals are received, HACG will purchase or develop a property for this purpose.

B) Leasing information, Planned – this information is estimated and may be subject to change during the Plan Year.

1. Anticipated total number of MTW Public Housing units leased in the Plan year:

1,683 assuming a 2% vacancy rate

2. Anticipated total number of non-MTW Public Housing units leased in the Plan year:

None

3. Anticipated total number of MTW HCV units leased in the Plan year:

2,286 assuming a 2% vacancy rate

4. Anticipated number of Non-MTW HCV units leased in the Plan year:

None

5. Description of anticipated issues relating to any potential difficulties in leasing units:

HACG does not anticipate any difficulties in leasing units.

6. Optional in Plan: Number of Project-based Vouchers in-use at the start of the Plan:

279 project-based vouchers

C) Waiting List Information

1. HACG will have a separate waiting list for the Community Choice mobility demonstration.
2. Arbor Pointe III (a designated senior development) will have a separate waiting list.
3. The Housing Choice Voucher waiting list has been closed since May 2009. HACG anticipates opening the waiting list in FY2014, HACG will convert from a waiting list to the lottery process. An electronic random lottery system will be implemented to determine the order in which applicant's eligibility will be verified and newly-applying families added to the existing waiting list.
4. The public housing and project based waiting list for Arbor Pointe I, Arbor Pointe II, and Arbor Pointe III are open.
5. The project based voucher waiting list for Willow Glen is open.

HOUSING NEEDS of FAMILIES on the WAITING LIST		
Public Housing		
Waiting List Total	# of Families	% of total Families
	2,458	
Income		
Extremely Low Income (<=30% AMI)	1,887	77%
Very Low Income (>30% but <=50% AMI)	460	19%
Low Income (>50% but <80% AMI)	111	5%
Family Composition		
Families with children	1,063	43%
Elderly Families	114	5%
Families with Disabilities	392	16%
Other	1,063	43%
Race / Ethnicity (Hispanic indicated in bold)		
White	248	10%
Black	2,210	90%
American Indian / Alaskan	0	0%
Asian / Pacific Islander	0	0%
Characteristics by Bedroom Size		
0 Bedroom	35	1%
1 Bedroom	1,218	50%
2 Bedroom	832	34%
3 Bedroom	301	12%
4 Bedroom	69	3%
5 Bedroom	3	0%

HOUSING NEEDS of FAMILIES on the WAITING LIST		
Housing Choice Voucher (Section 8)		
	# of Families	% of total Families
Waiting List Total	198	
Income		
Extremely Low Income ($\leq 30\%$ AMI)	165	83%
Very Low Income ($>30\%$ but $\leq 50\%$ AMI)	28	14%
Low Income ($>50\%$ but $<80\%$ AMI)	5	3%
Family Composition		
Families with children	84	42%
Elderly Families	5	3%
Families with Disabilities	19	10%
Other	90	45%
Race/Ethnicity (Hispanic indicated in bold)		
White	3	2%
Black	195	98%
American Indian/Alaskan	0	0%
Asian/Pacific Islander	0	0%
Characteristics by Bedroom Size		
0 Bedroom	0	0%
1 Bedroom	101	51%
2 Bedroom	50	25%
3 Bedroom	38	19%
4 Bedroom	6	3%
5 Bedroom	3	2%

SECTION III. NON-MTW RELATED HOUSING AUTHORITY INFORMATION

A) List Planned Sources and Uses of Other HUD or Other Federal Funds

Sources and Uses are based on a full 12 month period	
SOURCES	
Multi-Family Project Based Rental Assistance - Columbus Villas	\$ 500,348
Permanent Supportive Housing - Willow Glen	\$ 135,733
Section 8 Mod Rehab Project - SRO	\$ 249,120
Title III Nutrition Program for Elderly	\$ 54,200
ROSS	\$ 158,920
FSS - Public Housing	\$ 46,350
FSS - Section 8	\$ 45,904
TOTAL SOURCES	\$ 1,190,575
USES	
Tenant Assistant Payments - Columbus Villas	\$ 500,348
Tenant Assistant Payments - Willow Glen	\$ 135,733
Housing Assistant Payments - SRO	\$ 207,216
Administrative Funding - SRO	\$ 41,904
Nutrition program meals and leisure activities	\$ 54,200
ROSS program expenses	\$ 158,920
FSS - Public Housing Coordinator Salary and Fringes	\$ 46,350
FSS - Section 8 Coordinator Salary and Fringes	\$ 45,904
TOTAL USES	\$ 1,190,575

B) Description of Non-MTW Activities Proposed by the Agency

HACG receives a variety of funds from HUD for non-MTW related activities such as Multi-Family Project Based Rental Assistance, Single Room Occupancy (SRO), Resident Opportunity and Supportive Services (ROSS), Family Self-Sufficiency for public housing and Section 8. HACG also receives funds from the USDA to operate the Title III Nutrition Program for the Elderly residents.

SECTION IV. LONG TERM MTW PLAN

The proposed MTW plan should be viewed in the larger context of HACG's Strategic Plan and Asset Management Plan. The Board of Commissioners and staff developed a Strategic Plan for HACG in 2003. The plan established a mission statement and delineated eight goals for HACG. Staff then established objectives for implementing each goal (a copy of the latest status report of the Strategic Plan included in Appendix A, page 52). The goals of the plan were reaffirmed in 2008 for inclusion in the Strategic Plan for 2008-2013. The plan can be summarized succinctly: HACG desires to provide excellent housing for our residents, excellent customer service for residents, applicants and landlords and good stewardship of public funds.

A corollary to the Strategic Plan was the development of an Asset Management Plan for HACG. The plan was originally developed in 2003 and updated in 2010. The Asset Management Plan placed each of HACG's communities in one of three categories.

Category One – Maintain: these are communities that are in good condition and will continue as public housing with future modernization as needed.

Category Two – Redevelop: these are communities that are experiencing functional or economic obsolescence. These communities will be replaced as soon as HACG can assemble the required financial resources.

Category Three – Modernize: these are communities that are located in areas that are not conducive to redevelopment. These communities will receive considerable modernization and will be held as public housing until the real estate market is conducive to redevelopment.

Category one properties received considerable attention directed at improving resident living environments, energy efficiency, curb appeal, central air conditioning, lighting, landscaping, dumpster enclosures and other improvements. Capital Funds and ARRA funds were used in these communities.

Category two properties were dealt with in order of top priority. HACG has taken a "worst first" approach to redevelopment.

The badly deteriorated Peabody Homes was redeveloped with a Hope VI Grant into the award winning Ashley Station community. Baker Village, a 590 unit mixed income, locally owned community (only 110 were public housing units) was demolished and through innovative financing was redeveloped into the award winning Arbor Pointe community.

Category three includes two of our largest communities. Both communities received substantial modernization.

In addition to the use of capital funds, each of these communities was improved with funds generated through the Capital Fund Financing Program (CFFP). HACG committed approximately 15% of its annual capital fund budget to provide extensive façade improvements, lighting, fencing and recreation at these sites. Improvements have been well received by our residents and the

community. Additionally, these communities received security grant funding in 2010 and security cameras have been installed.

HACG provides excellent housing. Customer service ratings are 90% or higher. REAC scores generally range from 93% - 95% and we have been a high performer in both public housing and Section 8 for many years.

HACG is at a point where continued improvements to quality and availability of housing require regulatory and funding flexibility currently unavailable to housing authorities unless they are Moving-to-Work demonstration agencies.

Our long term plan is to improve availability and housing accessibility to residents and concentrate on additional housing needs in the community; combating homelessness (particularly for veterans) and providing additional housing choices.

In addition to providing excellent housing, HACG wants to provide additional services to improve residents' lives and enable them to become self-sufficient. Our long term goals include redevelopment of two additional communities into three mixed income communities that will provide additional housing choices, reduce the concentration of poverty and assist in reducing chronic homelessness (working with the Columbus, Georgia plan to end homelessness - Home for Good). HACG proposes to make available immediately 30 vouchers to house chronic homeless families. HACG plans to address this activity through its existing voucher program. By 2019, using MTW flexibility of, but not limited to, Sections B.1 - single fund budget with full flexibility; D.1.c – define, adopt and implement differing reexamination program; D.1.e. – determine the percentage of project based HCV assistance; D.2.a. adopt reasonable payment standards, rents or subsidy levels; 4. - alternate waiting list and tenant selection procedures; and D.5 ability to certify HQS, HACG plans to provide 120 additional units of permanent supportive housing. To the extent that MTW flexibility is needed, future years' items will be proposed for review and approved by HUD in subsequent MTW Plans and/or MTW Plan Amendment submissions. A schedule of planned activities is listed below:

Year	Description	Notes by 2018	No. of Housing Units
2014	Phase One: Rapid Re-housing Voucher	During the construction of the housing developments, 30 vouchers will be available immediately to house chronic homeless families and individuals.	30
2015	Phase Two: Willow Glen II	Modeled after Willow Glen development, a stand alone complex with 30 units of housing for chronic homeless.	30
2016	Phase Three: Booker T. Washington	20 Units of permanent supportive housing will be provided in a mixed-income community.	20
2017	Phase Four: Willow Glen III	Modeled after Willow Glen development, a stand-alone complex with 30 units of housing for chronic homeless.	30
2018	Phase Five: Booker T. Washington Redevelopment II	20 Units of permanent supportive housing will be provided in a mixed-income community.	20
2019	Phase Six: Chase Redevelopment	20 Units of permanent supportive housing will be provided in a mixed-income community.	20

Our long term plan also includes expanding housing choices for voucher holders (initial efforts in this area are included in our proposed Moving-to-Work activities). In addition, we hope to assist public housing residents in becoming self-sufficient and have identified an initial test site in our proposed Moving-to-Work activities.

We have begun to identify administrative reforms which will result in a financial savings that can be used to provide additional services to residents. This is an outstanding opportunity to strengthen programs by judicious use of the ability to block grant public housing and voucher funding.

HACG believes that the flexibility provided by the Moving-to-Work Program will allow us to continue our excellent work of providing the finest, affordable housing in the Columbus, Georgia area and provide services to allow residents to become more self-sufficient.

SECTION V. PROPOSED MTW ACTIVITIES: HUD APPROVAL REQUESTED

Activity One: Community Choice - Examine Whether or Not Introducing Voucher Holder Families into Communities of Higher Income Improves Outcomes for Voucher Families; Determine Whether or Not Voucher Families will take Advantage of Community Choice Options

A) MTW Initiative Description

A major premise of HOPE VI and other mixed income housing programs is that introducing low income families into other higher income communities will lead to improved economic, education, health and social outcomes. While much research has been conducted regarding the public housing program, *HACG proposes to examine this premise in the Housing Choice Voucher program.*

HACG proposes to examine whether or not introducing voucher holder families into communities of higher income improves outcomes for those voucher families. In addition, HACG proposes to determine whether or not voucher families will take advantage of enhanced mobility options – and why or why not.

Specifically, HACG proposes in two phases, to utilize up to eighty housing vouchers for this initiative with up to forty vouchers being issued in FY2014 and up to forty vouchers being issued in FY2015. In FY2014, HACG will adjust its payment standards so that up to twenty vouchers will be issued with authorization to rent housing at rents up to 120% of local fair market rents. This will allow families to move to areas of low poverty and will help achieve one of HUD’s priorities of de-concentration of poverty. Up to twenty additional vouchers will be project based in a market rate property in a very *low poverty* area of Columbus. These vouchers will also allow reasonable rents of up to 120% of fair market rents. 20 similar HCV holders not currently living in a low-poverty area will be randomly selected as the control group.

To implement this MTW demonstration activity, HACG proposes to set the payment standard for these vouchers at 120% of the Fair Market Rent (FMR). HACG’s strategy is to advertise for the project basing of vouchers and will set specific rating criteria including, but not limited to, owner/management experience, age and condition of property, location (low poverty area), site amenities (parking, play areas, community or common area rooms); unit amenities (porches, square footage), quality of life (proximity to schools, retail and other essential services) etc.

Treatment and control group participants will be selected on a volunteer basis. Treatment group participants will be selected from the current and future wait lists (wait lists will be separate, which enables families to be on multiple wait lists). HACG will seek families agreeing to activity parameters, including time period. Control group participants will be selected by Columbus State University’s Social Research Center, which will conduct the evaluation for this activity.

Should HACG encounter difficulties in locating an appropriate private market property or properties for this initiative, HACG plans to develop or purchase a property in a low poverty area designed to meet or exceed its advertised criteria as a contingency plan.

In the instance that HACG needs to purchase a property for this initiative and in the abundance of caution, HACG requests MTW flexibility to exceed the 25% building cap on the number of project-based vouchers per building at a property; waive the requirement to assign project-based assistance through a non-competitive process (property will be owned by HACG or an affiliate entity), and HACG requests to perform HQS inspections on properties that it owns.

If HACG is unable to partner with private market properties and is unable to purchase properties for this initiative, then HACG will need to develop property in a low-poverty area to meet this initiative. In this instance, HACG requests MTW flexibility to exceed the 20% cap on the number of project-based vouchers; exceed the 25% building cap on the number of project-based vouchers per building at a property; waive the requirement to assign project-based assistance through a non-competitive process (property will be owned by HACG or an affiliate entity), and HACG requests to perform HQS inspections on properties it owns.

HACG submits that city building and inspection codes are stringent and conducting HQS inspections would present a duplicative burden on HACG. Therefore, HACG requests that property inspected by the city and receiving a Certificate of Occupancy be certified as meeting HQS, which will allow the property to fall into the normal inspection rotation in subsequent years. HACG will continue to perform spot inspections to ensure HQS is being met.

In lieu of a third party inspector and to ensure that unit quality does not suffer, HACG plans to conduct quality control inspections, continue to empower and encourage maintenance staffs to report irregularities, and have site personnel “inspect” units during periodic pest control service. HACG plans to randomly select a portion of units for inspection based on the monthly quantity.

Currently, it is unclear to HACG what a partnership will look like, whether it will be a true financial and management partnership, a hybrid partnership, or some other available contractual partnership with a for-profit or non-profit organization. HACG, however, does note that a partner could have some ownership role.

Also, HACG intends to offer voluntary mobility and FSS counseling to the target groups. HACG believes that by providing mobility and FSS counseling opportunities, households will have increased awareness concerning the relative costs of living; amenities; employment opportunities; school rankings, etc. in certain areas. This will allow a greater and more informed housing choice.

HACG will evaluate three (3) voucher groups based on the metrics and benchmarks. The two target groups and control group are as follows:

- 1st group will be the 20 vouchers with community choice and the
- 2nd group will be the 20 project based vouchers in the low poverty area;
- The 3rd group will be the control group from similar HCV voucher holders.

HACG will compare the results from Target Group 1 and Target Group 2 against the Control group. Group 1 – Community Choice will be provided with a voucher and receive mobility counseling. Group 2 – Project based will be provided with a project based voucher with the understanding that the family must reside within the same community for a minimum of 3-years.

After the 3-year period, families may move, but movement will be limited to census tracts of low-poverty. This analysis will show if the Target Groups utilized the community choice option. Also, HACG will compare Target Group 1 to Target Group 2. This comparison will show if Target Group 1 utilized full choice mobility versus Target Group 2 whose Community Choice was tied to a project based voucher.

As part of this Activity, HACG intends to offer mobility and FSS counseling to target groups 1 and 2. All families may elect to enroll in the HCV FSS program. Families not enrolled in the HCV FSS program and not employed will be offered the opportunity to participate in “light” FSS counseling opportunities. “Light” FSS counseling consists of the opportunity to receive referrals to self-sufficiency activities, such as job referrals, job skills workshops, but families will not have a specific signed self-sufficiency plan. Families in which all household members age 18 and over and have been employed for 6 months or more or are currently considered a full-time student may opt out of any self-sufficiency related services.

HACG will compare the Target Groups to determine if location options had an effect on family self-sufficiency (education, income and household satisfaction (see metrics and benchmarks). All results will be evaluated for the desired impacts and outcomes.

The current payment standard for HACG is 100% of Fair Market Rents (FMR). The current FMR and proposed 120% payment standard by bedroom are shown below:

Bedroom Size	2013 FMR	120% of FMR
1 BR	\$ 621	\$ 745
2 BR	\$ 736	\$ 883
3 BR	\$ 1,014	\$ 1,217
4 BR	\$ 1,304	\$ 1,565

FMR = Fair Market Rent

The current average HAP is \$513 per unit. If all 40 residents take advantage of the 120% payment standard the average HAP will increase \$2 to \$515 per unit. All rents will be subject to a rent reasonableness determination.

Number of Vouchers	Per Unit Cost (avg)	Total HAP per Month
2,293	\$ 513	\$ 1,176,309
40	\$ 616	\$ 24,640
2,333	\$ 515	\$ 1,200,949

The 40 community choice vouchers per unit cost will increase \$103. This equates to an increase of \$49,440 per year in HAP assistance payments.

Number of Choice Mobility	PUC Increase	Total HAP per Year
40	\$ 103	\$ 49,440

B) MTW Statutory Objectives

This activity will significantly increase housing choice for families who wish to trade off their present spatial geography and economic conditions and provide greater choices for their children in an area of lower poverty. Living in an area of lower poverty is anticipated to provide motivation to become employed, if only through greater home stability, community role models and influence, and networking. Further, these families will be encouraged to become part of HACG's HCV FSS program which will provide additional encouragement and increased opportunities for self-sufficiency.

C) Anticipated Impacts

- More flexibility in choosing areas of housing;
- Introduce low income families into higher income communities and areas of low minority concentration;
- Improve economic, education, health and social outcomes for residents;
- Increased employment possibilities are anticipated through the motivation and encouragement provided by FSS light case management along with referrals to soft skill classes, job training opportunities and employment referrals.

Potential negative consequences:

- Residents do not take advantage of the opportunity to move to an area of low poverty;
- Some families may encounter difficulties adjusting to the new neighborhoods;
- Transportation may be a problem in some family situations;
- HAP assistance will increase approximately \$49,440 per year if all 40 residents take advantage of the 120% of FMR payment standard.

D) Baseline and Benchmarks:

Metric	Baseline	Benchmark	Implementation Schedule
Annual Income of Target Groups and Control Group	TBD – annual income level at implementation	TBD – annual income increase of 3% in year 1	Effective July 1, 2013. Results to be measured at end of each year.
Avg. Per Unit Cost for all vouchers	Current PUC is \$513	Increase of PUC to \$515	Effective July 1, 2013. Results to be measured at end of each MTW year.
Number of Community choice Households that choose to reside in an low-poverty area	Baseline of Zero	15 families are expected to move to a low-poverty area.	Effective July 1, 2013. Results to be measured at the end of each MTW year.
Number of Households with increased earned income	TBD at implementation – average household income	TBD – increase of 3%	Effective July 1, 2013. Results to be measured at the end of each MTW year.
Resident Satisfaction (home, health, social, economic, etc.)	TBD by resident survey at time of implementation	TBD by resident survey at end of MTW years 3 & 5.	Effective July 1, 2013. Results to be measured at end of MTW years 3 and 5.

E) Data Collection process and the proposed metrics the Agency will use to measure how this activity will achieve one or more of the MTW statutory objectives:

- The annual income of the 2 target groups and control group will be tracked with the HACG housing computer software in order to determine the desired results;
- The Average Per Unit cost for vouchers will be monitored monthly with internal management reporting and required reporting to VMS;
- The education levels will be evaluated at implementation compared to survey results at year 3 and year 5;
- Inspection outcomes of the target and control groups will be compared at implementation and every year that follows in order to evaluate the desired results;
- Resident satisfaction will be evaluated based on surveys completed in years 1 (baseline), 3 and 5.

F) Authorizations cited:

Authorizations requested for consideration reflect HACG’s primary and contingency* plans.

Attachment C Statement of Authorizations - Section B and D:

B.1. (single fund budget with full flexibility);

B.2. (...may partner with for-profit and non-profit entities...);

D.1.e (authorization to determine the percentage of project based housing assistance);

D.2.a. (authorization...to establish payment standards...that differ from current...program);

D.7.b. (authorization to establish a...competitive process or utilize an existing...process...);

*Contingency authorizations should HACG exercise the plan to purchase units. . .

- B.1. (single fund budget with full flexibility);
- B.2. (...may partner with for-profit and non-profit entities...);
- D.1.e (authorization to determine the percentage of project based housing assistance);
- D.4. (authorization to determine waiting list procedures, tenant selection procedures...that differ...);
- D.6. (authorization to adopt a...process for determining whether units meet...eligibility requirements...);

*Contingency authorizations should HACG exercise the plan to develop units. . .

- B.1. (single fund budget with full flexibility);
- B.2. (...may partner with for-profit and non-profit entities...);
- D.1.e (authorization to determine the percentage of project based housing assistance);
- D.4. (authorization to determine waiting list procedures, tenant selection procedures...that differ...);
- D.6. (authorization to adopt a...process for determining whether units meet...eligibility requirements...);
- D.7. (authorization to develop and adopt a...policy and process for project-basing Section 8 tenant-based leased housing assistance...);

G) Provide the following information for any rent reform initiatives:

Not applicable; this is not a rent reform initiative.

Activity Two: Innovations to Reduce Homelessness - Accelerate the Local Goal to End Homelessness in 10 Years, Prioritizing Housing for Returning Veterans and their Families as needed, through Permanent Supportive Housing Initiatives, with an Early Implementation of Rapid Re-housing Vouchers. This activity only applies to new participants, thus there are no current participants transitioning to an alternate rent structure.

A) MTW Initiative Description:

HACG is in the vanguard of housing authorities providing innovative programs for reducing homelessness. HACG developed and manages the very successful twenty-eight unit Willow Glen permanent supportive housing community that is considered by the State of Georgia Department of Community Affairs as a prototype of excellent permanent supportive housing. HACG is also very involved in the local efforts of “Home for Good: the Alliance to End Homelessness.”

HACG has partnered with the Home for Good and the United Way to create a program that links permanent housing to supportive services for homeless families. HACG in conjunction with “Home for Good” proposes to use 150 housing choice vouchers to reduce chronic homelessness in Columbus with a special emphasis toward military veterans. **Homeless veterans will be given a preference for these vouchers.** HACG is electing to pursue a referral-based program with New Horizons Community Service Board (CSB) and/or other service providers as appropriate to select families of any size for rapid re-housing vouchers. Families referred from New Horizons CSB or similar service provider will be considered for a voucher. A priority preference will be given to homeless veterans. In addition to priority preference, HACG will maintain a separate wait list for referrals from New Horizons CSB or similar service providers in order to ensure this target group is serviced as soon as possible.

The homeless veteran often has difficulty in paying a minimum rent when beginning in the program due to limited/zero income. Most clients gain an income source through VA case management during the first year of entering the program. To facilitate the transition, minimum rents would be set at zero for the first twelve months of program participation. After the first 12 months, minimum rent would be set at \$50.

Authorization D.2.b request is needed to maintain the ability to move to a sponsor-based program, should the proposed referral-based program not gain sufficient traction, as HACG believes this authorization provides the flexibility to provide housing to homeless families, especially veterans, in a sponsor-based program.

In order to insure that homeless veterans benefit from gainful employment, HACG proposes to change the percentage of adjusted income for calculating rent for newly employed residents qualifying as a homeless veteran. The rent calculation percentage will be returned to 30% over five years as follows:

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

This approach will allow the newly employed residents to benefit financially from employment rather than feel that they are penalized for becoming employed.

***Please note that the preference, elimination of minimum rent and the rent calculation for newly employed residents only applies to homeless veterans.**

HACG's initiative to reduce homelessness is comprised of 2 separate and distinct components. HACG proposes to make available up to 30 of its existing vouchers, immediately upon HUD approval, as rapid re-housing vouchers for homeless families. These vouchers will be made available as needed for general issue, project-based, or sponsor-based use and will provide immediate support for homeless families.

Future long-term components of HACG's initiative to reduce homelessness consist of HACG's proposal to develop two stand-alone thirty unit permanent supportive housing communities similar to Willow Glen. In addition, sixty additional permanent supportive housing apartments will be developed as part of three planned HACG mixed-finance communities. New Horizons Community Service Board has agreed to provide supportive services for this housing. HACG realizes that it will take seven to eight years to provide 120 units of permanent supportive housing. Nevertheless, housing is obviously a pressing need for the homeless.

B) Statutory Objectives:

- Increase housing choice for low income families
- Reduce costs of providing services to the homeless
- Give incentive for homeless veterans to work

C) Anticipated Impacts:

- Provide much needed housing for homeless families
- Assist families through counseling
- Increase HACG's leadership, collaboration and civic engagement
- Increase access to stable and affordable housing
- Increase economic security
- Improve health and stability
- Increase accountability by the community through improved data collection

D) Baseline and Benchmarks

Metric	Baseline	Benchmark	Implementation Schedule
Number of chronic homeless families that become HACG residents	Baseline of zero	30	Effective July 1, 2013 Results at end of 1 st year
Number of chronic homeless families that become HACG residents and seek employment	Baseline of zero	5	Effective July 1, 2013 Results at end of 1 st year
Number of chronic homeless families that become HACG residents and attain employment	Baseline of zero	1	Effective July 1, 2013 Results at end of 1 st year

E) Data collection process and the proposed metrics the Agency will use to measure how this activity will achieve one or more of the MTW Statutory Objectives:

In collaboration with Home for Good, all metrics will be monitored and reported yearly.

F) Authorizations Cited:

Attachment C Statement of Authorizations - Section D:

D.2.a. (authorization to adopt and implement reasonable policy to establish rents);

D.2.b. (authorization to determine contract rents and... content of... agreements that differ...);

D.4. (authorization to determine waiting list...tenant selection...and criteria and preferences...);

G) Provide the following information for any rent reform initiatives:

1. Agency’s Board approval of policy

The HACG Board’s approval of this rent policy is included in the Board’s resolution adopting the MTW application and First-Year Annual Plan.

2. Impact Analysis

The impact of this MTW activity is positive for the residents and the community. This activity only applies to new participants, thus there are no current participants transitioning to an alternate rent structure that could be negatively impacted.

The waiver of the first year minimum rent and the tiered rent structure for homeless veterans will be a minimal loss to HACG and is significantly outweighed by the positive impacts on these veterans. After homeless veterans become residents and seek gainful employment, the tiered rent calculation structure will provide a savings to the resident as well as increase the rental income to HACG.

HACG projects that this activity will impact the agency in the following way. First, HACG estimates that 50% (15) of the rapid re-housing vouchers will be held by homeless veterans, which means that HACG will waive the \$50 minimum rent for the first 12 months. Therefore, HACG projects it's the first year financial impact to reflect a loss of \$9,000 OR:

50% of 30 x -\$50 (minimum rent waived) x 12 months = -\$9,000 loss for the first year

On any given day, there are more than 1,500 people experiencing homelessness in the Columbus community. Even more alarming is the fact that the Muscogee County School District has identified 2,200 students who meet the definition of homelessness. Those considered chronically homeless account for 180 to 450 people. In addition, approximately 48% of our community's homeless have a disability and 21% are families. This MTW activity will have a significant impact on reducing these statistics and providing a safe and productive home life for many people and families.

3. Annual re-evaluation of rent reform initiative

HACG will review this activity yearly to ensure that it is still providing positive outcomes as desired.

4. Hardship case criteria

HACG proposes no hardship policy because no additional burden is placed on the residents.

5. Transition period

Please refer to the implementation schedule in the baselines and benchmarks.

6. Documentation of Public Hearing

Public hearings were held on May 24, 2012, June 7, 2012 and June 14, 2012. Documentation of the public hearings is found in Section VIII. Administrative.

Activity Three: Administrative Reforms - Institute Administrative Reforms to Reduce Staff and Increase Income, with Benefits Going to Residents

A) MTW Initiative Description:

HACG plans to implement the following administrative reforms that will improve operational efficiencies and reduce operating costs.

- Asset limitation: For new admissions and existing residents, income from assets below \$50,000 will be excluded. This activity will reduce unnecessary intrusions into tenant privacy as HACG will not have to send inquiries to asset sources which would reveal to these parties that the household is receiving HACG assistance. This activity is expected to positively impact all of HACG's households.
- Self-certification of assets: Household assets will be verified by third-party verification or documents upon admission to the programs. This will provide the baseline for occupancy specialists to use in future years to determine if households are eligible to self-certify to the amount of assets they hold. All households with assets below \$50,000 will be eligible to self-certify the year following verification. See Appendix B, page 60.
- Eliminate the 40% of income cap in the voucher program. HACG proposes to waive the current 40% cap on the percentage of income spent on rent. HACG's goal is to allow maximum resident choice in the voucher program by allowing participants the option of exceeding the 40% cap, however, in order to eliminate the possibility of "rent burden" in no circumstance will the participant's portion of rent be allowed to exceed 50% of their income. New residents will be transitioned immediately and existing families will be transitioned at their next re-certification.

B) MTW Statutory Objectives:

- Reduce cost and achieve greater cost effectiveness in federal expenditures

C) Anticipated Impacts

- Decrease the amount of time it takes to locate and lease a unit.
- Streamline the recertification process for all households
- Simplify the rent calculation, making it easier for the resident to understand
- Significantly reduce the administrative burden on the managers and occupancy specialists in order to allow them to spend more time with the residents addressing other concerns and needs.
- Reduction in administrative expenses with the reduction of copy paper, envelopes, postage and other office supplies.

D) Baseline and Benchmarks

Metric	Baseline	Benchmark	Implementation Schedule
Number of staff hours and cost of recertification process related to income and asset verification	3,529 staff hours	3,529 Staff Hours	For all households, at annual recertification. Beginning July 1, 2013. Results in year 2.
Reduction in annual tenant revenue to HACG for public housing to exclusion of income from assets	Average tenant rent is \$179	Average tenant rent - \$179	For all households, at annual recertification. Beginning July 1, 2013.
Increase in HAP to landlords based on exclusion of income from assets	Average HAP payment is \$513	Average HAP payment - \$513	For all households, at annual recertification. Beginning July 1, 2013.

E) Data collection process and the proposed metrics the Agency will use to measure how this activity will achieve one or more of the MTW Statutory Objectives:

HACG will use a process improvement approach to documenting time required in performing all of the steps associated with the MTW policy. We will use that information as the baseline for the comparison at annual intervals to access improvements and desired results

F) Authorizations Cited:

Attachment C Statement of Authorizations - Section C and D:

- C.2. (authorization to develop local preferences and ACOP);
- C.4. (authorization to restructure the initial, annual, and interim review process);
- C.11. (authorization to determine family payment, including TTP, the minimum rent, utility reimbursements, and tenant rent);
- D.1.c. (authorization to adopt and implement a re-examination program that differs)
- D.2.a. (authorization to adopt and implement any reasonable policy to establish payment standards, rents, or subsidy levels...that differ from the currently mandated program...);
- D.2.b. (authorization to determine contract rents...to determine the content of the contract...);
- D.3.a. (authorization to determine income qualifications for participation...that differ from...mandated...requirements);
- D.3.b. (authorization to adopt and implement any reasonable policy for verifying...income);

G) Provide the following information for any rent reform initiatives:

1. Agency's Board approval of policy

The HACG Board's approval of this rent policy is included in the Board's resolution adopting the MTW application and First-Year Annual Plan. Please see Section VIII. Administrative for copies of board resolution number 3166.

2. Impact Analysis

The impact of eliminating income for the first \$50,000 of assets will result in a minimal decrease of rental income to HACG from public housing residents. Because asset income under \$50,000 will no longer be verified, HACG will be unable to monitor the impact over time.

Families will be positively impacted by the elimination of income for the first \$50,000 of assets by having a streamlined (quicker) recertification process

HACG expects the elimination of the 40% cap to be advantageous to families by incentivizing families to use their vouchers in areas of low poverty and low minority concentration.

3. Annual reevaluation of rent reform initiative

HACG will review the asset limit yearly with the goal of balancing access and equity.

4. Hardship case criteria

HACG proposes no hardship policy because no additional burden is placed on the residents.

5. Transition period

Please refer to the implementation schedule in the baselines and benchmarks.

6. Documentation of Public Hearing

Public hearings were held on May 24, 2012, June 7, 2012, and June 14, 2012. Documentation of the public hearings is found under Section VIII. Administrative.

Activity Four: Administrative Efficiencies - Improve Efficiency, Reduce Costs, and Alleviate Burdens by Allowing Elderly/Disabled Participants to Complete Re-certification Every Three Years

A) MTW Initiative Description:

HACG proposes doing triennial re-certifications for heads of households defined as elderly / disabled families, where the sole source of income is a fixed income. Income examples include Social Security (SS), Supplemental Security Income (SSI), Social Security Disability (SSD), pensions, and similar fixed incomes. Head of Households meeting the elderly / disabled family definition with earned income will continue to certify on an annual basis as all other residents.

The activity's main objective is to reduce administrative costs and residents' inconvenience for both Public Housing and Housing Choice Vouchers re-certifications for elderly and disabled head of households that have stable income.

HACG spends considerable staff time and material costs to recertify elderly/disabled households with stable income. These re-certifications result in minimal changes in participant rent.

In order to implement this Activity, HACG requests to create local forms needed to streamline processing by addressing current form expiration dates, HACG proposes to review all existing HUD PH and HCV forms, identify and vet proposed changes and implement new forms. Forms to be evaluated for modification include Form 9886 and any other forms with an expiration date of less than 3 years. Local forms will be submitted to HUD for approval and will include language noting that funding for the contract is subject to the availability of appropriations.

HACG proposes to stagger recertification dates over three years to ensure that the numbers of re-certifications are scheduled evenly over the execution period resulting in an even workflow. HACG proposes one-third will be given a one-year re-certification, one-third a two-year re-certification and one-third given a three-year re-certification. HACG proposes to implement this activity first at its elderly / disabled developments (three-year re-certifications). The one and two-year re-certifications will be family developments divided by geographical area. New residents will be transitioned depending on their development's re-certification dates or geographical area.

B) MTW Statutory Objective:

This activity supports MTW statutory purposes by reducing cost and achieving greater cost effectiveness. Transitioning to a triennial re-certification for elderly/disabled households with stable incomes allows HACG to reduce costs as shown below.

C) Anticipated Impacts:

- Streamline the recertification process for the elderly and disabled households;
- Increase in disposable income for these households since the rent payment will remain stable for three years;
- Simplify the rent calculation, making it easier for the resident to understand;

- Reduce the burden on the resident to gather all the documentation for the recertification process;
- Significantly reduce the administrative burden on the managers, occupancy specialists and re-exam specialists in order to allow them to spend more time with the residents addressing other concerns and needs. HACG anticipates a yearly savings for public housing of \$6,266 and a yearly savings for Section 8 of \$7,113.

Current Re-certification Hours

HACG Program	Number of Elderly / Disabled Residents	Recert staff hours	Rate per hour including benefits	Total Salary and Benefits
Public Hsg	704	645	\$ 29.13	\$ 18,798.56
Section 8	904	829	\$ 25.75	\$ 21,338.17

Yearly Administrative Cost				\$ 40,136.73
----------------------------	--	--	--	--------------

MTW Re-certification Savings

HACG Program	Number of Elderly / Disabled Residents	Recert staff hours	Rate per hour including benefits	Total Salary and Benefits
Public Hsg	235	215	\$ 29.13	\$ 6,266.19
Section 8	301	276	\$ 25.75	\$ 7,112.72

Yearly Administrative Savings				\$ 13,378.91
-------------------------------	--	--	--	--------------

HACG will implement this activity one-third over the next three years

Potential negative consequences:

- Minimal loss of rental income to HACG.

D) Baseline and Benchmarks:

Metric	Baseline	Benchmark	Implementation Schedule
Number of Elderly/Disabled head of households with stable income being recertified once a year – Public Housing	704 re-certifications	Reduction of 235 public housing annual recertifications	Effective July 1, 2013. The Triennial recertification to be implemented immediately on new residents and phased in based on date of annual certification
Number of Elderly/Disabled head of households with stable income being recertified once a year – Section 8	904 re-certifications	Reduction of 301 Section 8 annual recertifications	Effective July 1, 2013. The Triennial recertification to be implemented immediately on new residents and phased in based on date of annual certification
Number of staff hours to process 100% of recertifications for elderly and disabled head of households	Current staff hours required to recertify is 1,474 for the HACG elderly and disabled head of households	Reduction of 491 staff hours	Triennial recertification to begin July 1, 2013. Results at end of each MTW year.
Administrative cost to process 100% of recertifications for elderly and disabled head of households	Current yearly administrative cost required to recertify is \$40,137 for the HACG elderly and disabled head of households	Reduction of \$13,379 yearly for salary and benefits	Triennial recertification to begin July 1, 2013. Results at end of MTW year.
Average rental income and HAP related to triennial recertification	Current Average Tenant Rental Payment \$127. Current average HAP \$513	Average Tenant Rental Payment - \$127. Average HAP - \$513	Triennial recertification to begin July 1, 2013. Results will be monitored at end of each MTW year.

E) Data collection process and the proposed metrics the Agency will use to measure how this activity will achieve one or more of the MTW Statutory Objectives:

- The number of elderly/disabled head of households will be tracked with the HACG housing computer software in order to determine the desired results;
- HACG will track and document the hours and cost of re-certifications for elderly and disabled head of households prior to implementation of MTW and thereafter;
- The Average rental income and HAP for voucher will be monitored monthly with internal management reporting and required reporting to VMS.

F) Authorizations cited:

Attachment C Statement of Authorizations - Section C and D:

C.4. (authorization to restructure the initial, annual, and interim review process);

D.1.c. (authorization to adopt and implement a re-examination program that differs);

G) Provide the following information for any rent reform initiatives:

1. Agency's Board approval of policy

The HACG Board's approval of this rent policy is included in the Board's resolution adopting the MTW application and First-Year Annual Plan. Please see Section VIII. Administrative for copies of board resolution number 3166.

2. Impact Analysis

The impact of this activity is positive. The rent lost by HACG is minimal and is significantly outweighed by the cost savings for the elderly and disabled households.

3. Annual reevaluation of rent reform initiative

HACG will review this activity yearly to ensure that it is still providing positive outcomes as desired.

4. Hardship case criteria

HACG proposes no hardship policy because no additional burden is placed on the residents. This will be extremely positive for all elderly and disabled residents. Residents could request an annual re-examination if they wish to do so.

5. Transition period

Please refer to the implementation schedule in the baselines and benchmarks.

Activity Five: Streamlined HQS Inspections - Allow Landlords and Residents the Ability to Self-certify in lieu of a Physical Housing Quality Standards Inspection

A) MTW Initiative Description:

While HACG intends to uphold HUD’s high standards of housing maintained in good repair for all HCV households, HACG believes it can achieve this outcome more cost effectively through an implementation of a HQS inspection of properties every 2 years. HACG proposes to inspect all properties receiving Section 8 assistance including those properties owned by HACG, owned by an HACG affiliate, or managed by HACG. Properties that pass either the initial inspection or the first re-inspection will be rewarded with an inspection every two years. Landlords and HCV families will certify compliance with HQS standards in the interim year. Although some units may not be inspected every year, every unit must meet HQS at all times while under contract. Properties that do not pass the first re-inspection will be considered “at risk” and will not qualify for the every other year inspection procedure until such time as the property meets the criteria of passing HQS by the first re-inspection. Further, HACG proposes a fee of \$45.00 for the 2nd re-inspection and each re-inspection following. This \$45.00 will be charged to the landlord and not be passed on to the HCV family. Note: This activity does not eliminate the possibility of complaint inspections generated by the HCV family or landlord (these inspections are always at no cost). As a further quality control measure to ensure that quality does not suffer, HACG plans to randomly inspect HACG owned/managed, HCV occupied properties by continuing to encourage maintenance staff to report irregularities and to have site personnel “spot check” units during periodic pest control service.

HACG proposes to initiate a written self-certification process for the correction of minor fail items for landlords with excellent HQS performance. Examples of HQS items which may be classified as minor fail items include: Cracked switch plate/outlet cover; Chipped/cracked/peeling paint when no child under age 6 resides in the unit and the unit was built after 1978; Stove burners that do not work and/or knobs that are missing or broken; Fail items for which the owner provides a receipt verifying the repair item is on-order or has been installed; yard area that is overgrown with weeds; etcetera.

Proposed self-certification forms are shown in Appendix C, page 61.

B) MTW Statutory Objective:

Activity Five supports MTW statutory purposes by reducing cost and achieving greater cost effectiveness.

C) Anticipated Impacts:

- Reduce the burden on voucher holders to be present for HQS yearly inspections;
- HACG anticipates that by implementing inspections to every 2 years will provide significant cost savings to the landlords and residents in time and inconvenience by not being required to schedule time to complete the inspection process. Landlords and residents in attendance at the public meetings commented favorably on this policy;

- Allow for possible reduction in inspector staff which will save HACG \$49,295 per year in salary and benefits. HACG currently has three Section 8 inspectors to cover approximately 5,085 inspections per year. By implementing inspections every two years and allowing HACG to inspect its own and affiliated properties, HACG will be able to reduce the yearly inspections to 3,390 which in turn allow for the elimination of one inspector position.

HACG Current Inspections			
Annual Inspections	Number	Other Inspections	Number
Annuals	1,985	Initials	561
Abated Properties	66	Contracted Inspections	297
Quality Control Inspection	0	Specials	852
Re-inspections (Annual Failed)	1,324		
Total Inspections:	3,375	Total Inspections:	1,710
HACG MTW Inspections			
Self-Certification Inspections	Number	Other Inspections	Number
Annuals	1,033	Initials	561
Abated Properties	35	HACG Affiliated / Owned	297
QC Insp - Self-Certify Annuals	52	Specials	720
Re-inspections (Annual Failed)	692		
Total Inspections:	1,812	Total Inspections:	1,578

<i>HACG Inspections before MTW - Total:</i>		5,085
<i>HACG Inspections as MTW Agency - Total:</i>		3,390
<i>HACG Workload Difference - Total</i>		-1,695
<i>HACG Workload Difference - Percent</i>		-33.3%
<i>HACG Inspector Cost before MTW</i>	\$	147,885.00
<i>HACG Inspector Cost as MTW Agency</i>	\$	98,590.00
<i>MTW Demonstration Cost Savings</i>	\$	49,295.00

Potential negative consequences:

- Landlord does not make the necessary repairs to the property;
Possible overpayment of HAP if the landlord does not notify HACG when a resident vacates.

D) Baseline and Benchmarks:

Metric	Baseline	Benchmark	Implementation Schedule
Average administrative cost related to Section 8 inspections	Current costs for Section 8 inspections – \$147,885	Costs for Section 8 inspections – \$147,885	For all households, at annual recertification. Beginning July 1, 2013. No reduction expected in year 1 – results at end of year 2
Number of staff hours related to Section 8 inspections	Current staff hours required for Section 8 inspections – 6,240	Staff hours required for Section 8 inspections – 6,240	For all households, at annual recertification beginning July 1, 2013. No reduction expected in year 1 – results at end of year 2.
Inspection Results	Last inspection results before implementation	Minimal Change	Will monitor and compare after each annual inspection

E) Data collection process and the proposed metrics the Agency will use to measure how this activity will achieve one or more of the MTW statutory objectives:

To evaluate the Section 8 inspections, HACG will track the number of inspections by type and purpose to evaluate the desired outcome of this MTW activity.

F) Authorizations cited:

Attachment C Statement of Authorizations - Section D:
D.5. (authorization to certify that housing assisted under MTW will meet HQS established...);

G) Provide the following information for any Rent Reform Initiatives:

Not applicable. This is not a rent reform initiative.

Activity Six: Rent Reform - Institute Controlled Study for Family Households

A) MTW Initiative Description:

One HACG public housing community, Farley Homes (the Target Site), will benefit from rent reforms designed to encourage resident self-sufficiency. Minimum rent will be increased from \$50 to \$75 per month in the first year of implementation and further increased to \$100 during the second year. Elderly and disabled residents will be excluded from the requirement and HACG will also consider hardship requests.

In order to encourage residents to increase income from gainful employment HACG proposes to change the percentage of adjusted income utilized for calculating rent for newly employed residents at the Target Site. The rental calculation percentage will initially drop to 26% and then be returned to 30% over five years as follows.

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

This approach will allow the newly employed residents to benefit financially from employment rather than feel that they are penalized by becoming employed. HACG residents at the selected target neighborhood will receive extensive self-sufficiency counseling. HACG proposes to inundate the Farley community with self-sufficiency options and information. Self-sufficiency options include enrolling in PH FSS or ROSS. Families not desiring to fully enroll in a self-sufficiency program will have the option of attending various on-site workshops and programs (financial literacy, parenting skills, basic educational skills, life skills, employment soft skills, etc.). Also, HACG proposes to implement self-sufficiency incentives for the target group. Incentives include limited childcare and transportation assistance as well as reducing out of pocket expenses for reasonable and necessary employment related attire and/or equipment (such as uniforms, licenses, tools, etc.), See Appendix D, page 62 for draft policies. Families living at the Control Site (Chase Apartments) will be offered PH FSS and ROSS enrollment and counseling, but will not be offered the additional incentives (childcare, transportation and employment related reimbursement). The self-sufficiency counseling and incentives will be funded partly through HACG's 2012 ROSS Service Coordinator Grant and partly through MTW fungibility.

HACG has carefully selected a Target (Farley Homes) and Control Site (Chase Apartments) in order to enhance the rigorous evaluation necessary to evaluate this MTW demonstration. HACG plans to notify existing families immediately upon approval of HACG's MTW plan and will transition existing families to this Activity during the annual re-certification process. The two groups are very similar in number of units, demographics, rent burden, and income levels. To further ensure site similarity, HACG plans to synch the Target Site and Control Site annual re-certification dates to coincide with one another.

B) MTW Statutory Objective:

Activity Six is designed to support MTW purposes by giving encouragement to the head of and other members of the household in seeking work or preparing for work by participating in job training, educational programs or programs that assist people to obtain employment and become economically self-sufficient. Incentives are designed to assist the newly employed to overcome the initial economic barriers to employment (childcare, specialized uniforms, transportation, etc.).

C) Anticipated Impacts:

- Encourage residents to increase earned income;
- Increase the number of employed residents;
- The tiered earned income disregard will provide a savings to the resident for 4 years;
- Increase in rental income for HACG if more residents are employed.

Potential negative consequences:

- Increasing minimum rents may be viewed as a burden for non-working families;
- Potential for unemployment after the rent burden returns to the 30% rental calculation in year five.
- Potential for unemployment after termination of monetary incentives

D) Baseline and Benchmarks

Metric	Baseline	Benchmark	Implementation Schedule
Target Group – increase in average earned income per working family	Farley Homes current average earned income per household is \$12,530	Earned income increase of 6% to \$13,282 per household	Effective July 1, 2013. Results to be measured at the end of each MTW year.
Target Group - increase in the number of households with earned income	Farley Homes currently has 40 households with earned income	Households with earned income to increase by 10% to 44 households with earned income	Effective July 1, 2013. Results to be measured at the end of each MTW year.
Target Group – number of unemployed head of households	Farley Homes currently has 44 head of households that are unemployed	Unemployed head of households to decrease by 6% to 41 HOH that are unemployed	Effective July 1, 2013. Results to be measured at the end of each MTW year.
Control Group – increase in average earned income per working family	Chase Homes current average earned income per household is \$13,697	Chase Homes average earned income per household - \$13,697	Effective July 1, 2013. Results to be measured at the end of each MTW year.
Control Group - increase in the number of households with earned income	Chase Homes currently has 36 households with earned income	Chase Homes will have 36 households with earned income	Effective July 1, 2013. Results to be measured at the end of each MTW year.
Control Group – number of unemployed head of households	Chase Homes currently has 45 head of households that are unemployed	Chase Homes - 45 head of households that are unemployed	Effective July 1, 2013. Results to be measured at the end of each MTW year.

E) Data collection process and the proposed metrics the Agency will use to measure how this activity will achieve one or more of the MTW Statutory Objectives:

The target and control group metric information will be monitored and tracked monthly with HACG housing computer software and internal management reporting.

Columbus State University’s Social Research Center will provide analysis of what statistically significant factors aid or inhibit a household’s transition to self-sufficiency. Data from this evaluation will be presented to HACG staff in order to maintain or improve its self-sufficiency programming.

F) Authorizations Cited:

Attachment C Statement of Authorizations - Section B, C, and E:

B.1.a. (combine funding...pursuant to Section 8(o), 9(d), and 9(e)...into a single, authority-wide funding source...);

B.1.b. (may use MTW Funds...to reduce cost and achieve greater cost effectiveness...to give incentives to families...where HOH is working, seeking work, or is preparing for work...);

B.1.b.iii. (provision of housing or employment related services or other case management activities...);

C.4. (authorization to restructure the initial, annual, and interim review process...)

C.11. (authorization to determine family payment, including the TTP, the minimum rent, utility reimbursements, and tenant rent);

E. (authorization to operate...existing self-sufficiency and training programs, including its FSS Programs and any successor programs...).

G) Provide the Following Information for any Rent Reform Initiatives:

1. Agency’s Board Approval of Policy

The HACG Board’s approval of this rent policy is included in the Board’s Resolution adopting the MTW application and First-Year Annual Plan. A copy of said resolution is found in Section VIII titled Administrative.

2. Impact Analysis

The impact of the increase in minimum rents and the tiered rent calculation will be analyzed at two properties. Farley Homes will be the test group with Chase Apartments as the control group. These two properties are very similar in number of units, demographics, rents and income levels. The current statistics are listed below:

Category	Farley	Chase
Units	102	108
Number of employed residents	40	36
Average Income per person employed	\$ 12,530	\$ 13,697
Average Rent of employed households	\$ 186	\$ 191
Number of unemployed head of household	44	45

Statistics as of March 2013

HACG proposes to increase the minimum rent at the target site (Farley Apartment Homes) from \$50.00 to \$100.00 over a two-year period. The first year, HACG will increase the rent from \$50.00 to \$75.00. Based on current statistics, 41 households are paying the minimum rent (\$50) or less. Forty of the households have a negative rent roll. A \$25.00 increase in rent will decrease their negative rent roll and another increase in rent in the second year will move the household to the positive side of the ledger.

Category	Number	Current Rent	Rent Increase	Impact
Households Paying Less than \$50	40	(2,054.00)	1,000.00	(1,054.00)
Households Paying the Min. Rent	1	50.00	25.00	75.00
Households Paying Min. Rent or Less	41	\$ (2,004.00)	\$ 1,025.00	\$ (979.00)
Based on March 2013 Statistics				

Further, HACG anticipates minimal financial impacts to its residents, as HACG envisions many residents affected by the rent increase will take part in the self-sufficiency programs being offered on an as needed basis, as well as apply for hardship waivers, which remain an option.

By assuming that 3 unemployed residents per year will take advantage of the tiered rent calculation, HACG should expect an increase in rental income of \$154,119 over a 5 year period.

HACG Rental Income Increase per MTW Year						
Annual Rental Increase per year						
Number of employed residents	Tiered Monthly Rent	Year 1	Year 2	Year 3	Year 4	Year 5
3	\$ 271.48	\$ 9,773.40	\$ 10,149.30	\$ 10,525.20	\$ 10,901.10	\$ 11,277.00
6	\$ 281.93		\$ 9,773.40	\$ 10,149.30	\$ 10,525.20	\$ 10,901.10
9	\$ 292.37			\$ 9,773.40	\$ 10,149.30	\$ 10,525.20
12	\$ 302.81				\$ 9,773.40	\$ 10,149.30
15	\$ 313.25					\$ 9,773.40
	Total	\$ 9,773.40	\$ 19,922.70	\$ 30,447.90	\$ 41,349.00	\$ 52,626.00
Five Year Total Rental Income Increase						\$ 154,119

For a tenant that obtains employment that mirrors the existing population, the savings per year for that tenant are estimated as follows:

Estimated Resident Savings - Tiered Rent					
Farley Homes					
Income % Charged for Rent	Tiered Monthly Rent	Rent at 30%	% Rent Decrease	Monthly Incentive	Annual Incentive
26%	\$ 271	\$ 313	13%	\$ 42	\$ 501
27%	\$ 282	\$ 313	10%	\$ 31	\$ 376
28%	\$ 292	\$ 313	7%	\$ 21	\$ 251
29%	\$ 303	\$ 313	3%	\$ 10	\$ 125
30%	\$ 313	\$ 313	0%	\$ -	\$ -

Cumulative Savings for HACG Residents						
Number of employed residents	Annual Incentive	Year 1	Year 2	Year 3	Year 4	Year 5
3	\$ 501.20	\$ 1,503.60	\$ 1,127.70	\$ 751.80	\$ 375.90	\$ -
6	375.90	-	1,440.00	1,080.00	720.00	360.00
9	250.60	-	-	1,440.00	1,080.00	720.00
12	125.30	-	-	-	1,440.00	1,080.00
15	-	-	-	-	-	1,440.00
	Total	\$ 1,504	\$ 2,568	\$ 3,272	\$ 3,616	\$ 3,600

Five Year Total Savings for Residents	\$ 14,559
----------------------------------------------	------------------

3. Annual reevaluation of rent reform initiative

HACG will review and test results annually to determine if the desired impact is accomplished.

4. Hardship case criteria

HACG will use the following procedures for families requesting a hardship waiver of the minimum rent criteria:

Within 10 working days of notification of the prospective increase in minimum rent, the resident must submit a request for review under the hardship procedure and the resident must submit documentation of the hardship. This documentation should include relevant proof of medical expenses, child care expenses, educational expenses, etc. The occupancy specialist will consider the documents and issue a determination within 5 working days of the receipt of request. If the request is denied, the resident may submit an appeal within 5 working days to the Chief Assisted Housing Officer. The Chief Assisted Housing Officer will issue a determination within 5 working days. If the Chief Assisted Housing Officer denies the appeal, the resident may make an additional appeal. The appeal must be issued within 5 working days.

This appeal should be sent to the Chief Assisted Housing Officer for review by a 3-person appeal committee appointed by the Chief Executive Officer. The appeal committee will review the relevant facts and may or may not hold a formal hearing and will issue a report within 10 working days. The determination of the appeal panel will be deemed final and binding on both parties. During the consideration of the appeal, the increase in minimum rent will be kept in abeyance until final resolution of the appeal.

5. Transition period

Please refer to the implementation schedule in the baselines and benchmarks.

SECTION VI. ONGOING MTW ACTIVITIES

NOT APPLICABLE

SECTION VII. SOURCES AND USES OF FUNDING

A. List Planned Sources (Operating, Capital, HCV) and Uses of MTW funds:

Sources and Uses are based on a full 12 month period	
SOURCES	
Tenant Revenue	\$ 2,184,003
Other Revenue*	\$ 168,564
Operating Subsidy	\$ 5,274,896
Capital Fund Program	\$ 3,923,720
Housing Choice Vouchers:	
HAP funding	\$ 14,074,709
Admin funding	\$ 1,232,166
Other Revenue**	\$ 23,638
TOTAL SOURCES	\$ 26,881,696
USES	
Public Housing Operating Expenses	\$ 5,507,115
COCC Frontline and Mgmt Fees	\$ 1,621,082
Capital Improvements	\$ 3,923,270
Housing Choice Vouchers:	
HAP payments	\$ 14,074,709
Admin Expenses	\$ 1,162,520
COCC Acctg and Mgmt Fees	\$ 593,000
TOTAL USES	\$ 26,881,696
*Interest, insurance dividends, late charges, laundry and vending, and other misc. sources	
**Administrative fee from incoming ports, interest, and other miscellaneous sources	

B. List Planned Sources and Uses of State or local funds:

At this time, HACG does not receive State or Local funds to operate our programs.

C. If Applicable, list Planned Sources and Uses of the COCC:

Sources and Uses are based on a full 12 month period	
SOURCES	
Property Mgmt Fee Revenue	\$ 1,324,152
Asset Mgmt Fee Revenue	\$ 181,920
Bookkeeping Fees	\$ 195,912
Frontline Service Fees	\$ 373,440
Central Maintenance Fee	\$ 899,924
Resident Transportation Fee	\$ 59,913
Capital Fund Mgmt Fees	\$ 208,708
Other Fees	\$ 19,403
Interest and Other Income	\$ 64,995
TOTAL SOURCES	\$ 3,328,367
USES	
Salaries and Benefits	\$ 2,009,512
Administrative Other	\$ 369,170
Utilities	\$ 37,494
Central Maintenance Expenses	\$ 416,229
Insurance	\$ 128,987
Other General Expense	\$ 17,432
Extraordinary Maintenance	\$ 13,200
Capitalized Equipment	\$ 30,000
Provision for Reserves	\$ 306,343
TOTAL USES	\$ 3,328,367

D. If using a Cost Allocation or Fee-for-Service Approach that Differs from the 1937 Act Requirements, describe the Deviations and the Reasons Therefore

HACG is not using a cost allocation system or fee-for-service that deviates from the 1937 Act Requirements.

E. List or Describe Use of Single-Fund Flexibility, if applicable, Describe Uses Across Traditional Program Lines or Special Circumstances in Support of an MTW Activity

In each MTW year, HACG plans to fund a MTW Coordinator position with the increased revenues from the public housing program and from the Section 8 administrative savings from the MTW initiatives. Any expenses for monitoring and evaluating the MTW initiatives will be paid from fungible use of capital funds. In the second MTW year, HACG will initiate full single-fund flexibility to accomplish the MTW goals and outcomes projected.

HACG plans to use full flexibility of funding as allowed under the MTW Demonstration Program single-fund budget to further the initiatives and goals as set forth in the plan, including, but not limited to, resident incentives as specified in the plan. All MTW initiatives and goals have the full support of the Board of Commissioners of the Housing Authority of Columbus, Georgia.

F. List Reserve Balances at Beginning of the Plan Year

PUBLIC HOUSING	
Operating Cash	\$ 3,991,121
FSS Escrow	\$ 30,217
Public Housing Total:	\$ 4,021,338
HCV (SECTION 8)	
Net Restricted Assets	\$ 1,182,564
Net Unrestricted Assets	\$ 3,000
FSS Escrow	\$ 70,030
Housing Choice Voucher Total:	\$ 1,255,594
COCC	
Other Restricted Cash	\$ 50,000
Operating Cash	\$ 685,848
COCC Total:	\$ 735,848
Total Projected Cash and Reserve Balances:	\$ 6,012,780

G. In Plan Appendix, Provide Planned Sources and Uses by AMP

Please see page 50.

SECTION VIII. ADMINISTRATIVE

A. Board Resolution signed by the Board of Commissioners adopting the Annual MTW Plan Certifications of Compliance.

Please see Attachment 3, page 88

B. Evaluation Methodologies – Description of any planned or on-going Agency-directed evaluations of the demonstration, if applicable.

- **Moving-to-Work Initiative**
- **Social Research Center**

Overview

The Social Research Center is an interdisciplinary research office created to support the needs of students and faculty at Columbus State University and stakeholders in Columbus, Georgia. The Center's Director, Dr. Kyle Christensen, works closely with the University's faculty to find appropriate research solutions to a wide range of social and policy specific problems. The Center provides a unique resource that is able to draw upon the talents of over 300 full-time faculty members at Columbus State University to address relevant research tasks.

The Social Research Center will provide the evaluation for the *Moving to Work Initiative* proposed by the Housing Authority of Columbus, Georgia (HACG). The evaluation methodologies employed in this evaluation strategy are informed by relevant faculty experts and existing *Moving-to-Work* programs such as the "Atlanta Model" developed by the Atlanta Housing Authority. This combination of existing expertise and existing programmatic experience will provide an ideal context for evaluating the HACG moving to work program.

Evaluation Structure

The *Moving-to-Work* Initiatives (MTW) proposed by the Housing Authority of Columbus (HACG) consists of five core programmatic elements. Each of these elements has a series of evaluation components designed to examine effectiveness and to improve programming for stakeholders. Elements of these program evaluations include both summative and formative components.

The first year of program evaluations will serve as the baseline for all subsequent programming. All reporting in this grant will take place in annual reports presented to the HACG. Quarterly meetings will also take place between HACG staff and the Director of the Social Research Center in order to provide updates on the status program implementation and reporting. All results will also be compiled into an annual report for the HACG. All evaluation processes and materials will be approved by the Columbus State University Institutional Review Board for the Protection of Human Subjects in Research to ensure all research is in compliance with ethical standards.

Initiative #1: Community Choice for Housing Choice Voucher Holders

The evaluation of project based voucher participants, the control group, and participants utilizing vouchers at 120% of fair market value, the treatment group, will consist of several key elements. First, geographic information systems will be used to analyze the spatial distribution of the participants. This analysis will explore the concentration of participants living in high poverty areas in Columbus, Georgia. This analysis will also focus on exploring which lower poverty areas are best suited for transitioning voucher holders based on access to social services, transportation, health, and educational opportunities.

The second phase of this study will explore quality of life concerns for participants in both target programs and control group. This evaluation of participants will also consist of a pre-test and post-test survey instrument that explores stakeholder self-assessments of their social, economic, education, and health conditions at the start of an evaluation year and their subsequent outcomes at the end of the initial year of service. After the initial year of programming, existing participants will be monitored over time to examine the effects of extended participation in the programming. These monitoring checks will occur twice a year.

All of these data will be analyzed to determine if there are statistically significant differences between voucher and project based participants. This evaluation will utilize a logistic regression model to explore differences between participants' self-reported quality of life measures and a range of control variables. These data will then be used to inform subsequent iterations of programming.

Initiative #2: Innovations to Reduce Homelessness

The evaluation component for the HACG consists of reducing homelessness by transitioning individuals from transitional housing to permanent supportive housing. The Social Research Center's evaluation of programming will consist of two distinct elements. First, program implementation will be verified by confirming the number of participating homeless individuals in a calendar year. Next, a series of surveys will be administered to participants upon entering the program. Follow up instruments will be administered on a six month basis to maintain time series data. These instruments will explore stakeholder satisfaction with housing and related programming involved in supporting these individuals as they seek to transition from being homeless. Data from these stakeholders would be used for several purposes. First, results from the participants would be utilized to coordinate and improve services between HACG and the New Horizons Community Service Board. Second, this feedback would be utilized to identify any gaps in service or planning to improve programming in subsequent years.

Innovation #3: Administrative Reforms to Reduce Staff and Increase Income

The evaluation plan for administrative program reforms consists of implementation of a programmatic shifts regarding recertification. HACG will provide evidence of implementation for the recertification evaluation methodology to Social Research Center staff. In addition, the HACG will record personnel expenditures related to processing to determine if the revised methodology increases productivity while significantly reducing cost.

Innovation #4: Administrative Efficiencies to Alleviate Burdens to Elderly/Disabled Families

Elderly and disabled participants have little or no change to income status annually. The evaluation plan for measuring efficiency and reducing costs will begin with a baseline of current cost per resident required for recertification of elderly and disabled residents. Annually HACG will provide the cost per resident figures associated with the implementation of the recertification on this target group. In addition, a baseline of the rent level of this group at implementation and the rent level after 3 years will be evaluated to determine if there is a significant difference in rent. As a part of the evaluation, elderly and disabled residents will be surveyed to determine resident satisfaction with this change.

Innovation #5: Streamlined HQS Inspections to Allow Self-Certification on Inspections

The evaluation plan for measuring cost savings and landlord/resident satisfaction will be twofold. A baseline will be determined upon implementation of man hours. Annually man hours will be reviewed to determine if there is a reduction. Also, landlords and residents will be surveyed following the first year to determine customer satisfaction with the new inspection schedule.

Initiative #6: Rent Reform for Public Housing Comparison Study

The Public Housing Rent Reform evaluation will consist of a pre-test and post-test design between residents of the control group and the post-test group. All residents will receive a pre-test survey instrument to measure their capacity for being self-sufficient. Individuals participating in the treatment group will also be asked to assess completeness and quality of the counseling. The post-test analysis will examine rates of employment and self-sufficiency between the control group in the Chase Homes structure and the Farley Homes structure. Participants in the study will be tracked longitudinally with continued implementation of relevant questionnaires to examine satisfaction and to identify any obstacles to success of programming. Analysis of these results will examine what statistically significant factors aid or inhibit a resident's transition to self-sufficiency. Data from this evaluation will be presented to HACG staff in order to maintain or improve programming as appropriate.

C. Evidence of Community Support and Involvement

1. Evidence (in the form of sign-in sheets, comments received, notices, etc.) that the PHA has provided community and PHA resident participation in developing its MTW application, including a public hearing.

For several years, HACG had been reviewing the possibilities of becoming an MTW Agency. When Notice PIH-2012-16 was issued in late February of this year, HACG decided to move forward and apply. HACG held a number of brainstorming sessions with its residents, community partners, national interest groups and consultants to determine the chances and strategies for competing. Staff meetings have discussed on a weekly basis the details of addressing the requirements of the Plan and the Application. Based on the mixed finance experience of collaborating with the best resources available nationally, HACG contracted with Reno & Cavanaugh LLC; Kent Watkins, CEO of Housing Innovations, Inc.; and Joe Schiff, Principal of the Schiff Group. Since then, HACG has held numerous conversations and meetings with national groups connected to several of the chief programmatic objectives: the homeless and the military, given Ft. Benning's significant presence in the Columbus area and the current situation involving returning veterans from the various wars and conflicts, needing housing and collateral services.

Public Hearings

HACG held three major public hearings to discuss the MTW Demonstration Program. A number of outreach mechanisms were implemented to encourage attendance including a Public Notice, separate letters to the Public Housing residents and the Section 8 residents and another letter to community partners and officials. The public notice was also included on the HACG website. The first two public hearings were held on May 24, 2012 and June 7, 2012 at 2:00pm and last hearing was held on June 14, 2012 at 5:30pm to accommodate any working residents.

At each hearing, a power point presentation was given and the HACG CEO, Len Williams, addressed the attendees and answered any questions through interactive discussion. Approximately 70 residents attended each of the first two public hearings. This turnout was 50% higher than other public hearings. The residents and community supporters gave positive feedback and presented other suggestions for MTW activities.

(See attachments below: the public notice, letters, and public hearing sign-in sheets)

SECTION IX. IN PLAN APPENDIX

Planned Sources and Uses by AMP

	402 BTW	405 WARREN WILLIAMS / RIVERS	406 WILSON	407 CHASE	408 CANTY	410 FARLEY	412 N. TERRACE	416 EJ KNIGHT	TOTAL ALL AMPS
SOURCES									
Net Rental Revenue	\$ 592,611	\$ 311,568	\$ 308,588	\$ 118,707	\$ 321,936	\$ 104,418	\$ 266,577	\$ 159,598	\$ 2,184,003
HUD Operating Subsidy	1,321,203	593,710	1,077,975	434,182	928,430	445,876	210,653	262,867	5,274,896
Other Revenue	24,360	6,957	18,086	5,789	95,047	3,932	8,400	5,993	168,564
Operating Reserves		8,846	-	301	25,859	-	-	15,174	50,180
TOTAL SOURCES	\$ 1,938,174	\$ 921,081	\$ 1,404,649	\$ 558,979	\$ 1,371,272	\$ 554,226	\$ 485,630	\$ 443,632	\$ 7,677,643
USES									
Administrative	\$ 588,141	\$ 280,532	\$ 425,322	\$ 193,413	\$ 417,999	\$ 183,882	\$ 160,557	\$ 159,008	\$ 2,408,854
Resident Services	38,943	26,654	37,544	9,015	31,676	9,557	8,247	7,622	169,258
Utilities	126,624	103,745	108,972	55,199	110,765	43,460	114,971	35,253	698,989
Maintenance & Operations	460,568	347,427	523,130	199,988	440,319	212,642	103,460	156,903	2,444,437
General Expenses	290,244	162,723	208,601	101,364	261,986	92,172	54,884	84,846	1,256,820
Extraordinary Maintenance	-	-	41,312	-	108,527	-	-	-	149,839
Provision for Reserves	433,654	-	59,768	-	-	12,513	43,511	-	549,446
TOTAL USES	\$ 1,938,174	\$ 921,081	\$ 1,404,649	\$ 558,979	\$ 1,371,272	\$ 554,226	\$ 485,630	\$ 443,632	\$ 7,677,643

SECTION X. APPENDIX

Appendix A – Status Report of Strategic Plan	52
Appendix B – Self-Certification Form – Assets	60
Appendix C – Self-Certification Form – Inspections	61
Appendix D – Incentive Policies	62
1 – Childcare Incentive	
2 – Employment Stipend Incentive	
3 – Transportation Incentive	

SECTION XI. ATTACHMENTS – PUBLIC HEARINGS

Attachment 1 – Public Notice	68
Attachment 2 – Attendance Sign-in Sheets	75
Attachment 3 – Board Resolution – MTW Application	88