

# 2020 ANNUAL MTW PLAN



Public Comment Period – February 4, 2019 through March 5, 2019

## **HUD Submissions**

Initial Submission: April 10, 2019

# **ANNUAL MTW PLAN SUBMITTED BY:**

**The Housing Authority of Columbus, Georgia**

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Ms. Lisa Walters, Chief Operating Officer  
Ms. Sheila Crisp, Chief Financial Officer  
Ms. Sabrina Richards, Chief of Property Management  
Mr. John Casteel, Chief Assisted Housing Officer  
Ms. Susan McGuire, Chief HR and Risk Management Officer  
Ms. Verona Campbell, Chief Real Estate Officer

## Glossary of Abbreviations and Acronyms

ACC	Annual Contributions Contract
ACOP	Admission and Continued Occupancy Plan (Public Housing)
Admin Plan	Administrative Plan (Housing Choice Vouchers)
AFFH	Affirmatively Furthering Fair Housing
AFH	Assessment of Fair Housing
CAPS	Childcare and Parent Services (program under GA Department of Early Care and Learning or DECAL)
CCG	Columbus Consolidated Government ( <i>City of Columbus AND Muscogee County</i> )
CHAP	Commitment to enter into Housing Assistance Payment ( <i>subsidy fund change</i> )
CoC	Continuum of Care ( <i>City of Columbus, Muscogee and Russell Counties</i> )
Comp Plan	Comprehensive Plan ( <i>prepared by CCG for long-term planning</i> )
Con Plan	Consolidated Plan ( <i>prepared by CCG for CDBG and HOME funds</i> )
CoP	Contract of Participation ( <i>element of the FSS Program</i> )
CSU	Columbus State University
DBHDD	GA Department of Behavioral Health and Developmental Disabilities
DCA	GA Department of Community Affairs
DFCS	Division of Family and Children Services ( <i>under GA Department of Human Services or DHS</i> )
EOGY	End-of-Grant Year
EOY	End-of-Year
FMR	Fair Market Rent ( <i>set by HUD annually</i> )
FO	Field Office ( <i>HACG falls under the Atlanta FO</i> )
FSS	Family Self-Sufficiency Program
FTE	Fulltime Equivalent
FYE	Fiscal Year End
HACG	Housing Authority of Columbus, Georgia

## Glossary of Abbreviations and Acronyms - continued

HAP(P)	Housing Assistance Payment (Program)
HCV	Housing Choice Voucher
HFA	Housing Finance Agency ( <i>DCA is the HFA for Columbus</i> )
HfG	Home for Good
HQS	Housing Quality Standards
HUD	US Department of Housing and Urban Development
IRS	Internal Revenue Service ( <i>US Department of Treasury</i> )
ITSP	Individual Training and Service Plan ( <i>element under the FSS Program</i> )
LAMP	Local Asset Management Plan
LIHTC	Low-Income Housing Tax Credit ( <i>disbursed by GA DCA</i> )
LURA	Land Use Restrictive Agreement
LURC	Land Use Restrictive Covenants
MOA/U	Memorandum of Agreement/Understanding
MTW	Moving-to-Work Demonstration Program ( <i>allows fungibility and flexibility</i> )
NNC	Neighborhood Network Center ( <i>computer lab or learning lab</i> )
NSV	Next Step Voucher
PBCA	Performance-Based Contract Administrator
PBRA	Project-Based Rental Assistance
PBV	Project-Based Voucher
PCA/PNA	Physical Condition Assessment/Physical Needs Assessment
PH	Public Housing
PHA	Public Housing Agency/Assistance Authority
PIC	Public and Indian Housing Inventory Management System ( <i>formerly known as Public and Indian Housing Information Center</i> )
PIH	Public and Indian Housing
PUC	Per Unit Cost
QAP	Qualified Allocation Plan ( <i>guidelines established by DCA for LIHTC funds</i> )

## Glossary of Abbreviations and Acronyms - continued

RAB	Resident Advisory Board
RAD	Rental Assistance Demonstration Program ( <i>converts PH units to PBRA and PBV</i> )
RAD PBV	RAD Project-Based Voucher ( <i>designation for former PH units/participants</i> )
ROSS	Resident Opportunities and Self-Sufficiency
RRV	Rapid Rehousing Voucher
S8	Section Eight ( <i>Housing Choice Voucher Rental Assistance Program</i> )
SP	Section Nine ( <i>Public Housing Rental Assistance Program</i> )
SEMAP	Section Eight Management Assessment Program
SRTO	Single-Room Occupancy Program ( <i>Moderate Rehabilitation Certificates</i> )
TBV	Tenant-Protection Voucher
TSO	Tenant Selection Office
TTP	Total Tenant Payment
UA	Utility Allowance
URP	Utility Reimbursement Payment
VASH	Veterans Affairs Supportive Housing Voucher Program
VAWA	Violence Against Women Act
VI-SPDAT	Vulnerability Index – Services Prioritization Decision Assistance Tool
VMS	Voucher Management System

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# **I. INTRODUCTION**

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## **A. Overview**

The Housing Authority of Columbus, Georgia (HACG) is a housing industry innovator located in the Chattahoochee Valley in Muscogee County, in western Georgia. HACG was created in 1938. HACG is a public body, both corporate and politic, governed by a seven-member Board of Commissioners appointed to terms by the Mayor of the Columbus Consolidated Government. HACG also provides all maintenance, management, financial, and administrative services for three small housing authorities located within a 50-mile radius of Columbus, Georgia. These small authorities each have fewer than 80 dwelling units.

The city of Columbus sits approximately 90 minutes southwest of Atlanta and ranks as the third largest city in Georgia. Columbus is home to the U.S. Army Fort Benning and The Maneuver Center of Excellence.



HACG's Mission Statement: The mission of the Housing Authority of Columbus, Georgia, is to be the foremost provider of quality, affordable housing in the Columbus region by developing, revitalizing and managing contemporary housing communities.

HACG is proud to be designated as 1 of 39 MTW agencies. The MTW designation has propelled HACG to accomplish its mission by allowing for redevelopment and RAD conversion. HACG actively supports and encourages other PHAs to participate in the MTW Expansion efforts.

Prior to signing its MTW Agreement with HUD, HACG managed a diverse rental portfolio complete with market-rent units, PH units, Project-Based Rental Assistance (PBRA) units, Project-Based Voucher (PBV) units, Single-Room Occupancy (SRO) certificates, Tenant-Based Vouchers (TBVs), and Veteran Affairs Supportive Housing (VASH) vouchers that addressed various low-income family compositions. Since then, HACG has added Low-Income Housing Tax Credit (LIHTC) units and Tenant-Protection Vouchers (TPVs) to its rental portfolio, which increases programming diversity and complexity.

HACG also sponsors and/or supports a Family Self-Sufficiency (FSS) Program, a Section 8 Homeownership Program, multiple Neighborhood Network Centers (NNC), and provides local transportation services for program participants at HACG-owned sites.

MTW is a national demonstration program authorized by Congress which gives HACG the flexibility to waive certain statutes and HUD regulations pertaining to both housing assistance programs (housing choice vouchers and public housing). Under the MTW Program, participating Public Housing Authorities (PHAs) introduce innovative ideas to HUD to address at least one of the three MTW statutory objectives. The objectives are:

1. Reduce cost and achieve greater cost effectiveness in federal expenditures;
2. Give incentives to families with children whose heads of household are either working, seeking work, or are participating in job training educational or other programs to assist in obtaining employment and becoming economically self-sufficient; and
3. Increase housing choices for low-income families.

The MTW activities undertaken by HACG are all designed to promote one or more of the MTW statutory objectives. HACG believes its MTW designation is the result of many years of laying the foundation for innovation at HACG and through the successful management of its housing assistance programs, as well as being an industry innovator.

HACG was designated as a MTW agency in December 2012 and entered into a 5-year MTW Agreement with the United States Department of Housing and Urban Development (HUD) (effective July 3, 2013). The agreement was extended to 2028 on April 14, 2016. The agreement allows HACG to waive certain US statutes and HUD regulations governing Section 8 (Housing Choice Vouchers) and Section 9 (Public Housing) Rental Assistance Programs. These waivers provide HACG the flexibility to introduce ideas and test theories to learn if the introduced idea provides a positive or negative impact to the agency and/or to the residents.

HACG provides this document for public inspection/review for all interested parties to share their thoughts and comments. The annual document was available for review and comment from February 4, 2019 through March 5, 2019 at the following locations:

- The Columbus Public Library, 3000 Macon Road (2<sup>nd</sup> floor reference desk);
- HACG's Central Office, 1000 Wynnton Road (front desk);
- HACG's Rental Offices, various addresses city-wide;
- HACG's Tenant Selection Office, 1180 Martin Luther King, Jr. Boulevard (front desk);
- HACG Website: <http://www.columbushousing.org/page.asp?urh=MovingToWork>

In addition to the above means to comment on this document, HACG also held Public Hearings/meetings to receive comments on the 2020 Annual MTW Plan on the following dates and locations:

- February 12, 2019, at 1006 Wynnton Road, two times 11:00 a.m. and 4:00 p.m.

All comments received prior to March 6, 2019, will be incorporated into the 2020 Adopted Annual MTW Plan. During fiscal year 2020 (July 1, 2019 through June 30, 2020), HACG seeks to implement actionable techniques and appropriate strategies to meet stated management goals and objectives listed in its plan.



## **2020 MTW SHORT-TERM GOALS AND OBJECTIVES**

- Maximize use of MTW block-grant with full flexibility
  - Combine all PH operating subsidies, Section 8 HAP funds and capital funds
  - Use combined funds to meet HACG's Strategic Plan goals and MTW Statutory Objectives
  
- Implement MTW Activity 2020.01 – Sponsor-Based Emergency Voucher Program
  - Set aside 24 TBVs for emergency housing due to fire, severe flooding, natural disasters and local government action
  - Prevent families from becoming homeless due to the above circumstances
  - Limit Emergency Voucher to a 6-month period at a flat rate of \$600 per month
  
- Collect and analyze data on Approved MTW Activities for external and internal purposes
  - Monitor and track MTW data to complete plans, reports and surveys
  - Strengthen MTW Activity reviews and recommendations for non-compliant issues
  - Cross reference HUD-approved MTW Activities with published guidance documents to ensure approved MTW Authorizations are relevant and necessary
  
- Collect and analyze data on HACG-closed MTW Activities for external and internal purposes
  - Cross reference HACG-closed MTW Activities with published guidance documents to acknowledge obsolescence of HUD-approved MTW Authorizations:

**APPROVED MTW ACTIVITES**

Activity Number	Name	Description	MTW Authorization
2014.02	Innovations to Reduce Homelessness	150 TBVs for chronically homeless families	D.2.a, D.2.b, D.4
2014.03	Administrative Reforms	Sets asset threshold at \$50k and Sets income cap at 50%	D.3.a, D.3.b
2014.04	Administrative Efficiency	Places eligible families on triennial re-certification cycle	D.1.c
2015.02	Portability Restrictions	Limits ports in and out of HACG to employment related reasons	D.1.g
2015.03	Simplify Utility Allowance Calculation	Creates 3 UA schedules based on rental assistance program	D.2.a
2015.04	Cap Childcare Deductions	Denies childcare deductions that exceed GA CAPS maximum	C.11, D.2.a
2016.01	Next Step Vouchers	10 TBVs for youth aging out of Foster Care	D.2.d, D.3.a, D.3.b, D.4
2016.02	Non-Competitive Project-Basing Process	Allows HACG to project-base assistance without competition	D.7.a
2016.03	Project-Basing Flexibilities	Exceed project-base caps, determine rent reasonableness, certify HQS on HACG units	D.1.e
2018.01	Eliminate/Reduce Interim Certification Examinations	No interims for Contribution Income only families, 1 interim for all other families	C.4, D.1.c
2018.02	Over-House 1 BR Eligible Families in 2 BR Units	Allows HACG to over-house smaller families in larger units at Patriot Pointe, Allows HACG to provide gap payment assistance, up to the FMR, to the landlord on behalf of the over-housed family	D.1.b, D.2.b

**APPROVED MTW ACTIVITES (continued)**

Activity Number	Name	Description	MTW Authorization
2019.01	Eliminate/Reduce Utility Reimbursement Payments (URPs)	Increases the minimum rent to \$150 over 2 years, Eliminates processing URPs over 2 year period	C.11
2019.02	Site-Based Housing Flexibility	Allows HACG to over-house smaller families in larger units at converted PH sites, Allows HACG to provide gap payment assistance, up to the FMR, to the landlord on behalf of the over-housed family, Extends occupancy time from 12 months to 24 months for PBV families	D.1.b, D.2.b
2019.03	HACG's Section 8 Project-Based Program Flexibility	Allows HACG to determine eligibility requirements of newly constructed or rehabilitated PBV assisted housing, Allows HACG to develop local process in lieu of current Site Selection Standards	D.6, D.7.c

**PROPOSED 2020 ACTIVITIES**

Activity Number	Name	Description	MTW Authorization
2020.01	Sponsor-Based Emergency Voucher Program	24 TBVs for emergency housing for flooding, fire, natural disasters and condemned housing	B.1.c, B.2, D.2.a, D.2.d, D.3.a, D.3.b, D.4

**HACG CLOSED OUT ACTIVITIES**

Activity Number	Name	MTW Authorization	Plan Year Approved	Plan Year Implemented	Close-Out Year
2014.05	Streamline HQS Inspections	D.5 (moved to 2016.03)	2014	2015	2017
2014.06	Rent Reform (Farley)	C.4, C.11	2014	2014	2018
2015.01	Eliminate Child Support Income from Rent Calculation	C.11	2015	2015	2017

**2020 NON-MTW SHORT-TERM GOALS AND OBJECTIVES**

HACG will continue our RAD conversion of Warren Williams (GA004000405) and Canty Homes (GA004000408). This conversion will include demolition of some units located in the floodway. The conversion will be a straight conversion and/or disposition with only critical repairs completed.

HACG will be completing a demolition application to SAC for our final public housing community known as Chase Homes (GA004000407). This demolition is based on environmental issues related to a large power station and railroad running through the site.

We are in the planning stages of a new development north of Chase Homes in an area known as the Mill District. HACG is working with The Mill District Board in the overall objectives and visions of the Mill District and the City of Columbus for this area of the City. A new development in that area will be the catalyst for additional development commercial and residential.

HACG has two mixed-financed properties with public housing units remaining. These properties were not included in the RAD Portfolio Award because they were constructed following the date of

the RAD Portfolio Award. HACG will submit RAD applications for Patriot Pointe (31 units) and Columbus Commons (24 units).

### **MTW LONG-TERM GOALS & OBJECTIVES**

- Position HACG to become designated as a Regional MTW Agency
  - Continue to monitor guidance documents from HUD, Federal Register, PIH Notices etc.
- Support HUD's efforts in the MTW Expansion
  - Consult/Advise other PHAs of the advantages of the MTW program
- Introduce new MTW initiatives that meet MTW Statutory Objectives
  - Propose MTW Activities that meet local housing needs
    - Workforce Housing – HACG may construct or acquire a development for this purpose
  - Evaluate the need for initiatives for targeted populations
    - Establish a minimum earned income
    - Create a different rent calculation for elderly, employed and similar families
    - Develop incentive initiatives related to education and employment
    - Create incentive and/or preference program for non-traditional “custodial parents”
    - Develop a program to “graduate” families off assistance to homeownership, affordable market units or workforce housing
    - Design a re-entry program, in partnership for ex-offenders
    - Establish an incentive for two parent households
    - Require Section 8 Landlords to receive direct deposit
    - Nonpayment of rent cure from 14 days to 7 days

### **NON-MTW LONG-TERM GOALS & OBJECTIVES**

Upon completion of the RAD conversion of Warren Williams (GA004000405) and Canty Homes (GA004000408) and Chase redevelopment (GA004000407), HACG will submit a 4% tax credit application to DCA for the rehabilitation and construction of these units.

After receiving approval from SAC on the demolition of Chase Homes (GA004000407), HACG will begin relocating the residents with Tenant Protection Vouchers.

**(II) GENERAL OPERATING INFORMATION**

**ANNUAL MTW PLAN**

**A. HOUSING STOCK INFORMATION**

**i. Planned New Public Housing Units**

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

ASSET MANAGEMENT PROJECT (AMP) NAME AND NUMBER	BEDROOM SIZE						TOTAL UNITS	POPULATION TYPE*	# of Uniform Federal Accessibility Standards (UFAS) Units	
	0/1	2	3	4	5	6+			Fully Accessible	Adaptable
	0	0	0	0	0	0	0	N/A		
	0	0	0	0	0	0	0	N/A		
	0	0	0	0	0	0	0	N/A		

**Total Public Housing Units to be Added in the Plan Year**

0

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

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

N/A

**ii. Planned Public Housing Units to be Removed**

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

AMP NAME AND NUMBER	NUMBER OF UNITS TO BE REMOVED	EXPLANATION FOR REMOVAL
GA004000405 Warren Williams	184	Public Housing (PH) units planned for removal from PH stock are planned to be converted to long-term Section 8 assisted Project-Based Voucher (PBV) units under the Rental Assistance Demonstration (RAD) Program.
GA004000408 Elizabeth Canty	249	Public Housing (PH) units planned for removal from PH stock are planned to be converted to long-term Section 8 assisted Project-Based Voucher (PBV) units under the Rental Assistance Demonstration (RAD) Program.
GA004000407 Chase Homes	108	Upcoming Demolition Application to SAC

541

**Total Public Housing Units to be Removed in the Plan Year**

**iii. Planned New Project Based Vouchers**

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

PROPERTY NAME	NUMBER OF VOUCHERS TO BE PROJECT-BASED	RAD?	DESCRIPTION OF PROJECT
Canty Homes	249	Yes	RAD conversion
Warren Williams	184	Yes	RAD conversion
Patriot Pointe	24	Yes	RAD conversion
Columbus Commons	31	Yes	RAD conversion

488

**Planned Total Vouchers to be Newly Project-Based**

**iv. Planned Existing Project Based Vouchers**

Tenant-based vouchers that the MTW PHA is currently project-basing in the Plan Year. These include only those in which at least an AHAP is already in place at the beginning of the Plan Year. Indicate whether the unit is included in RAD.

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	PLANNED STATUS AT END OF PLAN YEAR*	RAD?	DESCRIPTION OF PROJECT
N/A	0	0		
N/A	0	0		

0

**Planned Total Existing Project-Based Vouchers**

Select "Planned Status at the End of Plan Year" from: Committed, Leased/Issued

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

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

PLANNED OTHER CHANGES TO MTW HOUSING STOCK ANTICIPATED IN THE PLAN YEAR
HACG is in the planning stages of a new development north of Chase Homes in an area known as the Mill District. HACG is working with the Mill District Board in the overall objectives and visions of the Mill District and the City of Columbus for this area of the City. A new development in that area will be a catalyst for additional development – commercial and residential.
When the Chase Homes demolition application is approved by SAC, HACG will receive tenant protection vouchers to relocate those residents. When the new development is completed, the Chase residents will have a preference to move to the new development.

HACG anticipates the possibility of acquiring property or building a workforce housing community focused on providing subsidized housing for “working poor” families.

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

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

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

HACG’s Capital Fund (CFP) totals about \$1.5M, where the balance of the CFP total will be committed/obligated to RAD Projects II and III. Expenditures may include costs associated with the modernization of Williams and Canty necessary to rehabilitate the sites to meet RAD requirements. Expenditure plans include S8 landlord payments and other expenditures related to converting PH units under RAD and/or specialty consulting services, such as environmental testing, survey and legal work, code research, and other activities necessary to complete the RAD portfolio conversion. Finally, CFP planned expenditures may include physical improvements, management improvements, Agency-wide non-dwelling structures and equipment, administrative and operation fees and costs, as well as preventative and routine maintenance to dwelling structures Agency-wide, minor pre & post construction costs for preliminary and completed project plans.

**B. LEASING INFORMATION**

**i. Planned Number of Households Served**

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

PLANNED NUMBER OF HOUSEHOLDS SERVED THROUGH:	PLANNED NUMBER OF UNIT MONTHS OCCUPIED/LEASED*	PLANNED NUMBER OF HOUSEHOLDS TO BE SERVED**
MTW Public Housing Units Leased	0	0
MTW Housing Choice Vouchers (HCV) Utilized	44,208	3,684
Local, Non-Traditional: Tenant-Based^	0	0
Local, Non-Traditional: Property-Based^	0	0
Local, Non-Traditional: Homeownership^	0	0
	44,208	3,684

**Planned Total Households Served**

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

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

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



LOCAL, NON-TRADITIONAL CATEGORY	MTW ACTIVITY NAME/NUMBER	PLANNED NUMBER OF UNIT MONTHS OCCUPIED/LEASED*	PLANNED NUMBER OF HOUSEHOLDS TO BE SERVED*
Tenant-Based	N/A	0	0
Property-Based	N/A	0	0
Homeownership	N/A	0	0

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

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

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

HOUSING PROGRAM	DESCRIPTION OF ANTICIPATED LEASING ISSUES AND POSSIBLE SOLUTIONS
MTW Public Housing	As a result of RAD conversion, there will be a number of units that will be on and off-line attributed to rhythmic exchange of units between HACG and General Contractors. This unit exchange may require residents to be relocated to complete the modernization work. The relocation efforts may cause extended periods of vacancy that should resolve itself as residents move into the completed units. Solutions include implementing successful RAD II strategies and processing new program admissions to reduce anxieties associated with extended vacancies.
MTW Housing Choice Voucher	Anticipate leasing issues include families not returning to converted units, managing Choice Mobility requests, and locating short term options for families impacted by the rehabilitation work. Solutions include implementing successful RAD II strategies, processing new program admissions, and recruiting new landlord partners.
Local, Non-Traditional	N/A

**C. WAITING LIST INFORMATION**

**i. Waiting List Information Anticipated**

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

WAITING LIST NAME	DESCRIPTION	NUMBER OF HOUSEHOLDS ON WAITING LIST	WAITING LIST OPEN, PARTIALLY OPEN OR CLOSED	PLANS TO OPEN THE WAITING LIST DURING THE PLAN YEAR
Federal MTW Housing Choice Vouchers	Community-wide	294	Closed	No
MTW Rapid Rehousing Vouchers; MTW Next Step Vouchers	Program Specific	70	Partially Open	Yes
Federal MTW Public Housing Units; Converted PH Units to RAD Project-Based Vouchers	Merged	5049	Open	Yes

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

N/A

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

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

WAITING LIST NAME	DESCRIPTION OF PLANNED CHANGES TO WAITING LIST
N/A	Description
N/A	Description

### **III. PROPOSED MTW ACTIVITIES: HUD APPROVAL REQUESTED**

#### **2020.01 – SPONSOR-BASED EMERGENCY VOUCHER PROGRAM (EVP)**

##### **A. Activity Description:**

###### **i. Describe the Proposed Activity**

Over the last several years, Columbus, Georgia and the entire country has been affected by natural disasters, such as tornados, hurricanes, fires and flooding. Since Columbus is located four hours north of the Gulf of Mexico and five hours west of the Atlantic Ocean, we have faced several circumstances where families needed emergency housing. Due to current regulations, HACG’s “hands are tied” to be able to assist these families in a timely fashion with critically needed housing.

Also, in Columbus during the last several years, we had a PBRA property (not related to HACG) with a failing REAC score, a condemned mobile home park and a fire that destroyed 24 units (3 buildings) where low income families resided. HACG could not provide housing assistance to these individuals or families in a timely fashion to make a difference in their situation.

HACG proposes to set-aside 24 TBVs for Emergency Housing for families affected by natural disasters, fire, flooding or notice to condemn property prompted by local government action. The TBV’s will be limited to a 6-month period in order to allow the individual or families to process insurance claims, contact family members and stabilize their finances. This activity is not intended to assist individual single families displaced by natural disasters but rather families residing in multifamily developments where six or more units are affected by natural disasters.

Due to the myriad of services a family may need other than basic housing, HACG proposes that these housing vouchers be sponsor-based. Sponsor-Based Partners have a greater network of support to assist those with emergency housing needs. Rather than provide a tenant-based voucher to a family or attach it to a property, the Sponsor-Based EVP provides voucher subsidies directly to the Sponsor. The Sponsor enrolls participants and operates the 6-month program to obtain adequate housing for families.

HACG proposes a flat-rate subsidy of \$600 per month per family to the Sponsor. When emergency situations occur, the Sponsor will contact HACG to arrange for emergency housing provided with the EVP MTW Activity. To expediate the move-in process, the family will have 30 days to income qualify. The sponsor will provide basic HQS on the selected housing before move-in.

The sponsor-based subsidies will be created with an eye towards entering into partnerships with service providers that work with individuals faced with these unexpected and unplanned circumstances. Often these families are in transition situations that create difficulties for more conventional subsidy approaches. By creating a partnership and providing subsidy dollars to assist otherwise eligible individuals, HACG helps the provider extend the reach of their service dollars thereby supporting the overall success of the family that is housed.

**ii. Describe How Activity Will Achieve One or More of the Statutory Objectives and the Specific Impacts on That Statutory Objective:**

This activity will fill a void for families affected by local natural disasters such as fire, flooding and condemned properties and achieves statutory objective #3) Increase Housing Choices for low-income families.

Natural disasters and fires are unpredictable. When these circumstances occur, HACG needs and wants a mechanism in place to be able to provide immediate assistance for the families affected. This activity increases the housing choices for families affected by natural disasters such as floods, fire or condemned property. HACG wants the opportunity to prevent families from becoming homeless and/or separated into different homes because of delayed assistance. The goal is to keep the family together during these times of uncertainty and allow the family to stay together while being stabilized. The real impact of this activity will be confirmed by the families assisted in the future.

**iii. Anticipated Schedule for Achieving the Stated Objectives:**

HACG will set-aside 24 TBV's for Emergency Housing during fiscal year 2020:

- July – August 2019, receive HUD Plan Approval
- September 2019 train staff on the new MTW Activity
- October issue RFP for a sponsor to assist with the activity
- December notify HACG partners and the City of Columbus of the available Emergency Housing assistance that HACG can provide
- The timing of issuing vouchers to families that need Emergency Housing is unpredictable due to the nature of the activity

**B. Activity Metrics Information:**

**i. Provide the Metrics from the “Standard HUD Metrics”**

HC #1 – Additional Units of Housing Made Available

HC #3 – Decrease in Wait List Time

HC #5 – Increase in Resident Mobility

HC #7 – Households Assisted by Services that Increase Housing Choice

ii. Give the Baseline Performance Level for each Metric Prior to the Implementation of the Proposed Activity

<b>HC #1: Additional Units of Housing Made Available</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of new housing units made available for households at or below 80% AMI as a result of the activity (increase). If units reach a specific type of household, give that type in this box.	Housing units of this type prior to implementation of the activity (number). This number may be zero.	Expected housing units of this type after implementation of the activity (number).	Actual housing units of this type after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
	Zero	12	TBD	TBD
<b>HC #3: Decrease in Wait List Time</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Average applicant time on wait list in months (decrease).	Average applicant time on wait list prior to implementation of the activity (in months).	Expected average applicant time on wait list after implementation of the activity (in months).	Actual average applicant time on wait list after implementation of the activity (in months).	Whether the outcome meets or exceeds the benchmark.
	+ 36 months	1 month or less	TBD	TBD
<b>HC #5: Increase in Resident Mobility</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of households able to move to a better unit and/or neighborhood of opportunity as a result of the activity (increase).	Households able to move to a better unit and/or neighborhood of opportunity prior to implementation of the activity (number). This number may be zero.	Expected households able to move to a better unit and/or neighborhood of opportunity after implementation of the activity (number).	Actual increase in households able to move to a better unit and/or neighborhood of opportunity after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
	Zero	12	TBD	TBD
<b>HC #7: Households Assisted by Services that Increase Housing Choice</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of households receiving services aimed to increase housing choice (increase).	Households receiving this type of service prior to implementation of the activity (number). This number may be zero.	Expected number of households receiving these services after implementation of the activity (number).	Actual number of households receiving these services after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
	Zero	12	TBD	TBD

**iii. Give the Annual Benchmark for Each Metric:**

Annual Benchmark					
Unit Measurement	Baseline	FY2021	FY2022	FY2023	FY2024
Number of new housing units made available for households at or below 80% AMI as a result of the activity (increase).	Zero	TBD	TBD	TBD	TBD
Average applicant time on wait list in months (decrease).	( 36 months)	TBD	TBD	TBD	TBD
Number of households able to move to a better unit and/or neighborhood of opportunity as a result of the activity increase	Zero	TBD	TBD	TBD	TBD
Number of households receiving serices aimed to increase housing choice (increase).	Zero	TBD	TBD	TBD	TBD

**iv. If Applicable, Give the Overall and/or Long-Term Benchmark(s) for Each Metric:**

The overall and/or long-term benchmarks will be determined after the first year of implementation of the activity.

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

HACG will use data collected data collected by our sponsor-based partner at intake and reports produced by the agency database. This information is tracked in our Yardi housing software.

### **C. Cost Implication**

#### **i. State Whether the Proposed Activity Will Result in any Cost Implications (Positive and/or Negative) for the MTW PHA.**

The cost of each voucher of this activity for a one-month period is \$600. If the entire six-month period is utilized the cost will be \$3,600 per voucher.

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

The cost of each voucher of this activity for a one-month period is \$600. If the entire six-month period is utilized the cost will be \$3,600 per voucher. The maximum amount if all 24 vouchers set-aside for this activity are utilized for the entire six-month period, will cost HACG \$90,000 per year. This represents only <1% of the HAP budget authority. HACG does not anticipate using all 24 vouchers each year; but HACG desires to set-aside 24 in case of major emergencies.

### **D. Need/Justification for MTW Flexibility**

#### **i. Cite the Authorization(s) that Gives the MTW PHA Flexibility to Conduct the Proposed Activity:**

Authorization B.1.c - ...activities carried out by agent...partner  
Authorization B.2 - ... partnerships with Profit/Non-profit Entities  
Authorization D.2.a ...adopt and implement...rents or subsidy levels  
Authorization D.2.d - ...implement term limits for HCV units...  
Authorization D.3.a - ...authorized to determine income qualifications for participation  
Authorization D.3.b - ...authorized to...implement...policy for verifying family...  
Authorization D.4 - ...authorized to determine...wait list procedures...

#### **ii. Explain Why the Cited Authorization(s) is/are Needed to Engage in this Activity:**

Requested authorizations are needed in order for HACG to extend vouchers to families requiring emergency housing:

- Establish partnership with a sponsor
- Adopt a flat rate for the voucher;
- Set term limits of the vouchers;
- Verify family income and composition quickly;
- Modify the wait list in order to housing emergency vouchers quickly.

**E. Additional Information for Rent Reform Activities:**

This activity does not meet the rent reform definition.

**IV. APPROVED MTW ACTIVITIES**

A. Implemented MTW Activities

Activity Number	Name	MTW Authorization	Plan Year Approved	Plan Year Implemented
2014.02	Innovations to Reduce Homelessness	D.2.a, D.2.b, D.4	2014	2014
2014.03	Administrative Reforms	D.3.a, D.3.b	2014	2014
2014.04	Administrative Efficiency	D.1.c	2014	2014
2015.02	Portability Restrictions	D.1.g	2015	2016
2015.03	Simplify Utility Allowance Calculation	D.2.a	2015	2015/2016
2015.04	Cap Childcare Deductions	C.11, D.2.a	2015	2015
2016.01	Next Step Vouchers	D.2.d, D.3.a, D.3.b, D.4	2016	2018
2016.02	Non-Competitive Project-Basing Process	D.7.a	2016	2018
2016.03	Project-Basing Flexibilities	D.1.e	2016	2018



## A. Implemented MTW Activities (continued)

Activity Number	Name	MTW Authorization	Plan Year Approved	Plan Year Implemented
2018.01	Eliminate/Reduce Interim Certifications	C.4, D.1.c	2018	2019
2018.02	Over-House 1 BR Eligible Families in 2 BR Units	D.1.b, D.2.b	2018	2019
2019.01	Eliminate/Reduce Utility Reimbursement Payments (URPs)	C.11	2019	2019
2019.02	Site-Based Housing Flexibility	D.1.b, D.2.b	2019	2019
2019.03	HACG's Section 8 Project-Based Flexibility	D.6, D.7.c	2019	2019

### 2014.02 Innovations to Reduce Homelessness

This activity sets aside 150 vouchers TBVs that links permanent supportive housing to supportive services for chronically homeless families. The activity includes a tiered rent schedule, minimum rent waiver and selection preference to the targeted group. Also, HACG is interested to learn if housing stability positively impacts household income, earned income and other socio-economic categories.

In addition, the activity places a special emphasis on military veterans, where veterans are a priority preference and newly employed veterans are eligible for employment incentives.

Employment incentives for veterans include:

- Waiving the minimum rent to assist veterans in focusing on employment (first 12 months)

Employment incentives for “unemployed” veterans that gain employment while in the “program” include:

- Employment – tiered rent calculation (veteran’s only)
  - 26% rent calculation for 12 months – year 1
  - 27% rent calculation for 12 months – year 2
  - 28% rent calculation for 12 months – year 3
  - 29% rent calculation for 12 months – year 4
  - 30% rent calculation for 12 months – year 5

HACG anticipates the following for the Innovations to Reduce Homelessness Activity in FYE 2020:

- No non-significant changes to this activity

- No modifications to the metrics during the period
- No different authorizations are needed to implement this activity than originally proposed
- No significant changes to this activity

### **2014.03 Administrative Reforms (HCV Only)**

This activity is designed to improve operational efficiencies and reduce operational costs by streamlining the rent calculation process and increase housing choices for program participants.

The activity supports the creation of forms necessary to self-certify assets at the local level. Self-certification of assets is permitted after the initial verification. Assets are subject to random verification. Additionally, this activity allows families to use more of their income (up to 50%) towards their rental amount.

HACG initiated procedures to close-out the PH elements in its 2017 Annual MTW Report due to RAD conversions using Low-Income Housing Tax Credit funds.

HACG anticipates the following for the Administrative Reforms Activity in FYE 2020:

- No non-significant changes to this activity
- No modifications to the metrics during the period
- No different authorizations are needed to implement this activity than originally proposed
- No significant changes to this activity

### **2014.04 Administrative Efficiencies (HCV Only)**

This activity is designed to improve operational efficiencies and reduce operational costs by introducing a triennial recertification cycle for elderly/disabled families. The opportunity to place elderly/disabled families on a triennial recertification cycle is determined on the head-of-household's (HOH) designation and the household income source(s).

Activity metrics are being tracked and reported in HACG's Annual MTW Report. Originally, this activity included public housing element, which has become functionally obsolete due to RAD conversion using Low-Income Housing Tax Credit funds.

Currently, HACG continues to conduct "mini-interims" on off-year program participants to reduce "sticker shock" related to rent changes 3-years later. HACG continues to conduct full certification examinations during participants scheduled triennial period.

HACG anticipates the following for the Administrative Efficiencies Activity in FYE 2020:

- No non-significant changes to this activity
- No modifications to the metrics during the period

- No different authorizations are needed to implement this activity than originally proposed
- No significant changes to this activity

### **2015.02 Portability Restrictions**

This activity restricts the movement of vouchers into and out of HACG's service jurisdiction. Voucher portability is limited to verifiable employment related reasons. The combined actions of "porting" to higher cost-of-living jurisdictions and voucher holders' lower earnings, limited HACG's ability to issue more vouchers and assist families in its own jurisdiction.

Verifiable employment may include the following:

- A letter of intent to employ (job offer letter), reassign, transfer, and similar
- Permanent Change of Station (PCS) orders, transfer orders, and similar
- Document on company letterhead, which will assist HACG in deciding the acceptance of ports in or out of Columbus, GA

Families may lose their rental assistance if a loss of employment occurs at the new location within the first six-months or before agency absorption occurs.

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

HACG anticipates the following for the Portability Restrictions Activity in FYE 2020:

- No non-significant changes to this activity
- No modifications to the metrics during the period
- No different authorizations are needed to implement this activity than originally proposed
- No significant changes to this activity

### **2015.03 Simplify Utility Allowance Calculation**

This activity streamlines the rental calculation process with a simplified Utility Allowance Schedule (UA) used throughout all the different rental assistance portfolio of HACG. The activity supports a UA schedule for 3 rental assistance programs in HACG portfolio:

- HCV (PBV and TBV)
- PH and RAD PBV
- Mixed Financed Sites (HUD UA Schedule)

Activity metrics are being tracked and reported in HACG's Annual MTW Report. The agency actively uses the UA Schedules and transitions schedules between programs due to the PH conversion to RAD PBVs.

HACG anticipates the following for the Simplify Utility Allowance Calculation Activity in FYE 2020:

- No non-significant changes to this activity
- No modifications to the metrics during the period
- No different authorizations are needed to implement this activity than originally proposed
- No significant changes to this activity

#### **2015.04 Cap Childcare Deduction**

This activity modifies applicable rules and regulations necessary to limit the amount of childcare deduction able to be taken by program participants. The activity allows HACG to place a cap on childcare deductions in line with the Georgia Childcare and Parent Services (GA CAPS) reimbursement amounts. GA CAPS helps low income families afford safe, and quality childcare by subsidizing childcare costs for children under the age of 13.

Childcare costs that exceed GA CAPS reimbursement amounts are reduced to categorical maximum amounts filtered by age. Hardship requests are addressed on a case-by-case basis in accordance with the Hardship Policy.

Families continue to furnish proof of their out-of-pocket childcare expenses and HACG staff simply verifies that provided costs are in-line with GA CAPS based on the child's age and service provider. HACG's rental assistance departments are charged with maintaining an updated GA CAPS chart.

HACG anticipates the following for the Cap Childcare Dependent Deduction Activity in FYE 2020:

- No non-significant changes to this activity
- No modifications to the metrics during the period
- No different authorizations are needed to implement this activity than originally proposed
- No significant changes to this activity

#### **2016.01 Next Step Vouchers**

This activity modifies applicable rules and regulations necessary to dedicate up to 10 TBVs for clients of the Georgia Department of Health and Human Services (GA DHHS), Division of Family and Children Services (DFCS) office. The activity serves as a homelessness prevention tool for youth aging out of Foster Care.

The following are requirements of the participants:

- Foster youth must begin, continue, and/or maintain appointments and case management visits with social service providers
- Vouchers expire in 36 months or age 23, whichever comes first
- Foster youth must meet 20-hour/week work requirement
- Work an average of 20-hours per week; and/or
- Attend school an average of 20-hours per week; and/or
- Attend job training course an average of 20-hours per week

Foster youth are required to exhaust DFCS resources first before being issued a Next Step Voucher (NSV). The primary intent is to ensure Foster youth are stabilized and ready to receive TBV.

HACG anticipates the following for the Next Step Vouchers (NSV) Activity in FYE 2020:

- No non-significant changes to this activity
- No modifications to the metrics during the period
- No different authorizations are needed to implement this activity than originally proposed
- No significant changes to this activity

## **2016.02 Non-Competitive Project-Basing Process**

This activity modifies applicable rules and regulations as necessary to project-base Section 8 rental Assistance at HACG owned (direct & indirect ownership) properties without competition.

Under this activity, HACG implemented plans to project-base Section 8 rental assistance at properties it redeveloped which are Patriot Pointe and Columbus Commons. HACG will also use this activity for newly constructed housing and substantially rehabilitated properties to receive subsidy.

HACG will apply activity elements to convert the 55 PH units at Patriot Pointe and Columbus Commons after fiscal year 2020.

HACG anticipates the following for the Non-Competitive Project-Basing Process Activity in FYE 2020:

- No non-significant changes to this activity
- No modifications to the metrics during the period
- No different authorizations are needed to implement this activity than originally proposed
- No significant changes to this activity

### **2016.03 Project-Basing Flexibilities**

This activity allows HACG to modify its HCV Program guidelines. HACG can project-base more than 25% (or in the case of the RAD Program, more than 50%) of the building cap. Also, HACG is allowed to determine rent reasonableness at HACG-owned (direct and indirect ownership) and allows HACG to certify housing at HACG-owned units.

When PHAs exceed the 25% per building cap (or 50% cap on RAD buildings) on PBV units with Section 8 rental assistance in an existing building in multi-family communities, there is a supportive services requirement attached to the current PBV regulations for exceeding these caps. Under this activity HACG can project-base up to 100% of a building's units, as well as waive the participation requirement of families in the "excepted" units.

Currently, HACG offers limited Supportive Services at the RAD developments. HACG understands that supportive services must be available, and the families are aware of and strongly encouraged to participate in offered services; however, it is noted that participation by families living in "excepted" units is not mandatory, nor required.

HACG anticipates the following for the Project-Basing Flexibilities Activity in FYE 2020:

- No non-significant changes to this activity
- No modifications to the metrics during the period
- No different authorizations are needed to implement this activity than originally proposed
- No significant changes to this activity

### **2018.01 Eliminate/Reduce Interim Certification Examinations**

This activity allows HACG to modify its Housing Choice Voucher (HCV) and Public Housing (PH) Programs guidelines to increase staff productivity, assist program participants in the preparation for market-rate units, and to eliminate a growing concern of program participants reporting a loss of income shortly after completing and intake and/or annual certification examination.

To accomplish this activity, HACG has implemented the following:

- Eliminated interim certification examinations on Contribution Income
- Program participants that report contribution income cannot report a loss of contribution income for 12 months
- Limited program participants to 1 interim certification examination annually for all other income related adjustments

HACG continues to address hardship requests on a case-by-case basis according to the Hardship Policy.

HACG anticipates the following for the Eliminate/Reduce Interim Certification Examinations Activity in FYE 2020:

- No non-significant changes to this activity
- No modifications to the metrics during the period
- No different authorizations are needed to implement this activity than originally proposed
- No significant changes to this activity

### **2018.02 Over-House 1 BR Eligible Families in 2 BR Units**

This activity allows HACG to over-house eligible, qualified low-income families at Patriot Pointe (near-elderly) development and provide gap payment assistance for over-housed families to the landlord.

Under this activity, HACG significantly improves the use of federal dollars and reducing vacancies. HACG offers unoccupied, large unit to smaller eligible, qualified families with limited housing options and limited resources.

Once an appropriate sized family and right-size unit becomes available that meets the accommodation needs of the incumbent family, HACG will issue a 30-day notice in accordance with the “transfer form” for the incumbent family to move/transfer to the appropriate unit.

HACG anticipates the following for the Over-House 1 BR Eligible Families in 2 BR Units Activity in FYE 2020:

- No non-significant changes to this activity
- No modifications to the metrics during the period
- No different authorizations are needed to implement this activity than originally proposed
- No significant changes to this activity

### **2019.01 Eliminate/Reduce Utility Reimbursement Payments (URPs)**

HACG seeks to improve its cost efficiency and promote self-sufficiency through the implementation of this activity. Elimination of this task achieves Cost Effectiveness of federal dollars.

Under this activity, HACG will increase the minimum rent to \$150 to eliminate URPs (or at the least significantly reduce the number of URPs processed) over the next two years. The increase in

minimum rent across all rental assistance programs significantly reduces negative rent situation that require an URP check.

Further, HACG’s schedule for increasing the minimum rent is as follows:

<b>Year</b>	<b>Monthly Rent</b>	<b>Effective Date</b>
2018	\$50	N/A
2019	\$100	January 1, 2019
2020	\$150	January 1, 2020

HACG provided significant lead time of notification to residents and does not anticipate any undue hardship because of the URP elimination. As needed, HACG will confer with its Hardship Policy on a case-by-case basis.

HACG anticipates the following for the Eliminate/Reduce Utility Reimbursement Payments (URPs) Activity in FYE 2020:

- No non-significant changes to this activity
- No modifications to the metrics during the period
- No different authorizations are needed to implement this activity than originally proposed
- No significant changes to this activity

### **2019.02 Site-Based Housing Flexibility**

This activity allows HACG to over-house eligible, qualified low-income families at the RAD developments and provide gap payment assistance for over-housed families to the landlord.

Under this activity, HACG significantly improves the use of federal dollars and reducing vacancies. HACG offers unoccupied, large unit to smaller eligible, qualified families with limited housing options and limited resources.

Once an appropriate sized family and right-size unit becomes available that meets the accommodation needs of the incumbent family, HACG will issue a 30-day notice in accordance with the “transfer form” for the incumbent family to move/transfer to the appropriate unit.

HACG anticipates the following for the Site Based Housing Flexibility Activity in FYE 2020:

- No non-significant changes to this activity
- No modifications to the metrics during the period
- No different authorizations are needed to implement this activity than originally proposed
- No significant changes to this activity



B. NOT YET IMPLEMENTED ACTIVITIES

**2019.03 HACG’s Section 8 Project Based Program Flexibility**

C. ACTIVITIES ON HOLD

**2014.01 HACG’s Community Choice** will be submitted in the 2019 MTW report for close-out because the evaluation period was complete.

D. CLOSED OUT ACTIVITIES

Activity Number	Name	MTW Authorization	Plan Year Approved	Plan Year Implemented	Close-Out Year
2014.05	Streamline HQS Inspections	D.5 (moved to 2016.03)	2014	2015	2017
2014.06	Rent Reform (Farley)	C.4, C.11	2014	2014	2018
2015.01	Eliminate Child Support Income from Rent Calculation	C.11	2015	2015	2017

- Activities granted under MTW Activity **2014.05** are authorized under Notice PIH 2016-05.
- HACG initiated the close-out process of **2014.06** in the 2018 Annual MTW Report. HACG closed out this activity because the evaluation period was complete.
- HACG used LIHTC funds to meet RAD requirements, which made MTW Activity **2015.01** functionally obsolete.
- HACG used LIHTC funds to meet RAD requirements, which made **PH elements** under MTW Activities **2014.03 and 2014.04** functionally obsolete.

## V. SOURCES AND USES OF FUNDS

<b>(V) SOURCES AND USES OF MTW FUNDS</b>
<b><u>ANNUAL MTW PLAN</u></b>

### A. ESTIMATED SOURCES AND USES OF MTW FUNDS

#### i. Estimated Sources of MTW Funds

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

FDS LINE ITEM NUMBER	FDS LINE ITEM NAME	DOLLAR AMOUNT
70500 (70300+70400)	Total Tenant Revenue	\$1,383,360
70600	HUD PHA Operating Grants	\$19,581,335
70610	Capital Grants	\$3,191,992
70700 (70710+70720+70730+70740+70750)	Total Fee Revenue	\$565,283
71100+72000	Interest Income	\$137,397
71600	Gain or Loss on Sale of Capital Assets	\$7,343
71200+71300+71310+71400+71500	Other Income	\$4,057,325
<b>70000</b>	<b>Total Revenue</b>	<b>\$28,924,035</b>

#### ii. Estimated Uses of MTW Funds

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

FDS LINE ITEM NUMBER	FDS LINE ITEM NAME	DOLLAR AMOUNT
91000 (91100+91200+91400+91500+91600+91700+91800+91900)	Total Operating - Administrative	\$5,963,671
91300+91310+92000	Management Fee Expense	\$0
91810	Allocated Overhead	\$0
92500 (92100+92200+92300+92400)	Total Tenant Services	\$363,343
93000 (93100+93600+93200+93300+93400+93800)	Total Utilities	\$553,350
93500+93700	Labor	\$0
94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	\$2,236,169
95000 (95100+95200+95300+95500)	Total Protective Services	\$33,277

96100 (96110+96120+96130+96140)	Total Insurance Premiums	\$469,484
96000 (96200+96210+96300+96400+96500+96600+96800)	Total Other General Expenses	\$2,161,421
96700 (96710+96720+96730)	Total Interest Expense & Amortization Cost	\$10,183
97100+97200	Total Extraordinary Maintenance	\$19,743
97300+97350	HAP + HAP Portability-In	\$15,909,700
97400	Depreciation Expense	\$1,203,694
97500+97600+97700+97800	All Other Expense	\$0
90000	Total Expenses	\$28,924,035

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

N/A

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

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

**PLANNED USE OF MTW SINGLE FUND FLEXIBILITY**

HACG uses the MTW Single-Fund flexibility to combine its funding sources to form the MTW Block Grant that will be used to administer current and future MTW Activities, rehabilitation associated with RAD and construction of new developments. The MTW Single-Fund Flexibility will be used to continue operations during any current and future government shutdown.

**B. LOCAL ASSET MANGEMENT PLAN**

i. Is the MTW PHA allocating costs within statute?

ii. Is the MTW PHA implementing a local asset management plan (LAMP)?

iii. Has the MTW PHA provide a LAMP in the appendix?

iv. If the MTW PHA has provided a LAMP in the appendix, please describe any proposed changes to the LAMP in the Plan Year or state that the MTW PHA does not plan to make any changes in the Plan Year.

N/A

**C. RENTAL ASSISTANCE DEMONSTRATION (RAD) PARTICIPATION**

i. **Description of RAD Participation**

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

planned/actual submission dates of all RAD Significant Amendments. Dates of any approved RAD Significant Amendments should also be provided.

**RENTAL ASSISTANCE DEMONSTRATION (RAD) PARTICIPATION**

HACG received a Portfolio Award January 7, 2014 to convert 1,321 to Project-Based Vouchers under RAD Component One. As of this Plan date, HACG has converted 783 units to RAD PBV. Chase Homes (GA04000407) consisting of 108 units are removed from the RAD conversion due to an upcoming demolition application to SAC. HACG has received CHAP awards for the remaining 429 units. HACG has two mixed-financed properties with public housing units remaining. These properties were not included in the RAD Portfolio Award because they were constructed following the date of the RAD applications for Patriot Pointe (31 units) and Columbus Commons (24 units). Due to the Federal Government shutdown all milestones were placed on hold.

ii. Has the MTW PHA submitted a RAD Significant Amendment in the appendix? A RAD Significant Amendment should only be included if it is a new or amended version that requires HUD

iii. If the MTW PHA has provided a RAD Significant Amendment in the appendix, please state whether it is the first RAD Significant Amendment submitted or describe any proposed changes from the prior RAD Significant Amendment?

**VI. ADMINISTRATIVE**

**A. RESOLUTION ADOPTING THE ANNUAL MTW PLAN**

The Board resolution adopting the 2020 Annual MTW Plan is located in the Appendix Section.

**B. DOCUMENTATION OF PUBLIC PROCESS**

The Annual MTW Plan was available for public review from February 4, 2019 through March 5, 2019 at the following locations:

- The Columbus Public Library, 3000 Macon Road (2<sup>nd</sup> floor reference desk);
- HACG’s Central Office, 1000 Wynnton Road (front desk);
- HACG’s Rental Offices, various addresses city-wide;
- HACG’s Tenant Selection Office, 1180 Martin Luther King, Jr. Boulevard (front desk);
- HACG Website: <http://www.columbushousing.org/page.asp?urh=MovingToWork>

In addition to the above means to comment on this document, HACG also held Public Hearings/meetings to receive comments on the Annual MTW Plan on the following dates and locations:

- February 12, 2019, at 1006 Wynnton Road, two times 11:00 a.m. and 4:00 p.m.

All comments received prior to March 6, 2019, were incorporated into the Annual MTW Plan. Comments are located in the Appendix Section.

**C. PLANNED AND ONGOING EVALUATIONS**

HACG's contract with Columbus State University's Social Research Center to evaluate HUD approved activities expired June 30, 2018. Columbus State University evaluated the now closed out activities:

2014.01 – Community Choice

2014.02 – Innovations to Reduce Homelessness

2014.06 – Rent Reform (Farley)

HACG will proceed with evaluating all approved and implemented activities internally.

**D. LOBBYING DISCLOSURES**

HUD Forms SF-LLL and HUD-50071 are located in the Appendix Section.

**APPENDIX SECTION**

RESOLUTION NO. \_\_\_\_\_

**A RESOLUTION APPROVING THE MOVING TO WORK (MTW) DEMONSTRATION PROGRAM'S FISCAL YEAR 2020 ANNUAL PLAN AND SUBMISSION OF SAID PLAN AND PLAN'S CERTIFICATIONS OF COMPLIANCE TO THE DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT (HUD)**

**WHEREAS**, the Board of Commissioners of The Housing Authority of Columbus, Georgia (HACG) by Resolution No. 3166 originally approved submission of a Moving-to-Work (MTW) Demonstration Program Application, Annual Plan, and Certification of Compliance to the Department of Housing and Urban Development (HUD); and

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

**WHEREAS**, HACG's Standard MTW Agreement with HUD was extended through 2028 on April 14, 2016; and,

**WHEREAS**, as part of the Standard MTW Agreement between HACG and HUD, a Plan and Certifications of Compliance must be submitted annually to HUD for approval; and,

**WHEREAS**, HACG has prepared such a plan in accordance with HUD's rules, regulations and guidance; and

**WHEREAS**, the proposed FY 2020 Annual MTW Plan was made available for public review and comment from February 1, 2019 to March 2, 2019 and public hearings/meetings were held on the proposed FY 2020 Plan on February \_\_\_\_\_, 2019; and,

**WHEREAS**, HACG considered all comments received regarding said FY 2020 MTW Plan:

**NOW, THEREFORE BE IT RESOLVED** by the Board of Commissioners:

1. The HACG's FY 2020 Annual MTW Plan is approved;
2. The Chairman or Secretary/Chief Executive Officer is authorized to execute the Certifications of Compliance; and,
3. Submission of said Certifications and FY 2020 Annual MTW Plan to HUD is authorized.

R. Larry Cardin \_\_\_\_\_  
Name of Authorized Official

\_\_\_\_\_  
Signature

## CERTIFICATIONS OF COMPLIANCE

### ***U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT OFFICE OF PUBLIC AND INDIAN HOUSING***

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

Acting on behalf of the Board of Commissioners of the Moving to Work Public Housing Agency (MTW PHA) listed below, as its Chairman or other authorized MTW PHA official if there is no Board of Commissioners, I approve the submission of the Annual Moving to Work Plan for the MTW PHA Plan Year beginning July 1, 2019, hereinafter referred to as "the Plan", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:

- (1) The MTW PHA published a notice that a hearing would be held, that the Plan and all information relevant to the public hearing was available for public inspection for at least 30 days, that there were no less than 15 days between the public hearing and the approval of the Plan by the Board of Commissioners, and that the MTW PHA conducted a public hearing to discuss the Plan and invited public comment.
- (2) The MTW PHA took into consideration public and resident comments (including those of its Resident Advisory Board or Boards) before approval of the Plan by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the Annual MTW Plan.
- (3) The MTW PHA certifies that the Board of Directors has reviewed and approved the budget for the Capital Fund Program grants contained in the Capital Fund Program Annual Statement/Performance and Evaluation Report, form HUD-50075.1 (or successor form as required by HUD).
- (4) The MTW PHA will carry out the Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990.
- (5) The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.
- (6) The Plan contains a certification by the appropriate state or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice, for the MTW PHA's jurisdiction and a description of the manner in which the Plan is consistent with the applicable Consolidated Plan.
- (7) The MTW PHA will affirmatively further fair housing by fulfilling the requirements at 24 CFR 903.7(o) and 24 CFR 903.15(d), which means that it will take meaningful actions to further the goals identified in the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR 5.150 through 5.180, that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing, and that it will address fair housing issues and contributing factors in its programs, in accordance with 24 CFR 903.7(o)(3). Until such time as the MTW PHA is required to submit an AFH, and that AFH has been accepted by HUD, the MTW PHA will address impediments to fair housing choice identified in the Analysis of Impediments to fair housing choice associated with any applicable Consolidated or Annual Action Plan under 24 CFR Part 91.
- (8) The MTW PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
- (9) In accordance with 24 CFR 5.105(a)(2), HUD's Equal Access Rule, the MTW PHA will not make a determination of eligibility for housing based on sexual orientation, gender identify, or marital status and will make no inquiries concerning the gender identification or sexual orientation of an applicant for or occupant of HUD-assisted housing.
- (10) The MTW PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
- (11) The MTW PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
- (12) The MTW PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.



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

The Housing Authority of Columbus, Georgia  
**MTW PHA NAME**

GA 004  
**MTW PHA NUMBER/HA CODE**

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

R. Larry Cardin  
**NAME OF AUTHORIZED OFFICIAL**

Chairman, HACG Board of Commissioners  
**TITLE**

\_\_\_\_\_  
**SIGNATURE**

\_\_\_\_\_  
**DATE**

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

**FY 2020 ANNUAL MTW PLAN**

**PUBLIC COMMENTS**

LINE	NAME	ORGANIZATION REPRESENTED	COMMENT (INCLUDE PAGE NUMBER IF POSSIBLE)
1			
2			
3			
4			
5			

# DISCLOSURE OF LOBBYING ACTIVITIES

Complete this form to disclose lobbying activities pursuant to 31 U.S.C.1352

Approved by OMB  
4040-0013

<b>1. * Type of Federal Action:</b> <input type="checkbox"/> a. contract <input checked="" type="checkbox"/> b. grant <input type="checkbox"/> c. cooperative agreement <input type="checkbox"/> d. loan <input type="checkbox"/> e. loan guarantee <input type="checkbox"/> f. loan insurance	<b>2. * Status of Federal Action:</b> <input type="checkbox"/> a. bid/offer/application <input checked="" type="checkbox"/> b. initial award <input type="checkbox"/> c. post-award	<b>3. * Report Type:</b> <input checked="" type="checkbox"/> a. initial filing <input type="checkbox"/> b. material change <b>For Material Change Only:</b> year <input type="text"/> quarter <input type="text"/> date of last report <input type="text"/>
<b>4. Name and Address of Reporting Entity:</b> <input checked="" type="checkbox"/> Prime <input type="checkbox"/> SubAwardee    Tier if known: <input type="text"/> * Name <input type="text" value="The Housing Authority of Columbus, Georgia"/> * Street 1 <input type="text" value="P. O. Box 630"/> Street 2 <input type="text" value="1000 Wynnton Road"/> * City <input type="text" value="Columbus"/> State <input type="text" value="GA: Georgia"/> Zip <input type="text" value="31902-0630"/> Congressional District, if known: <input type="text"/>		
<b>6. * Federal Department/Agency:</b> <input type="text" value="Dept. of Housing and Urban Development"/>		<b>7. * Federal Program Name/Description:</b> <input type="text"/> CFDA Number, if applicable: <input type="text"/>
<b>8. Federal Action Number, if known:</b> <input type="text"/>		<b>9. Award Amount, if known:</b> \$ <input type="text"/>
<b>10. a. Name and Address of Lobbying Registrant:</b> Prefix <input type="text"/> * First Name <input type="text"/> Middle Name <input type="text"/> * Last Name <input type="text"/> Suffix <input type="text"/> * Street 1 <input type="text"/> Street 2 <input type="text"/> * City <input type="text"/> State <input type="text"/> Zip <input type="text"/>		
<b>b. Individual Performing Services (including address if different from No. 10a)</b> Prefix <input type="text"/> * First Name <input type="text"/> Middle Name <input type="text"/> * Last Name <input type="text"/> Suffix <input type="text"/> * Street 1 <input type="text"/> Street 2 <input type="text"/> * City <input type="text"/> State <input type="text"/> Zip <input type="text"/>		
<b>11.</b> Information requested through this form is authorized by title 31 U.S.C. section 1352. This disclosure of lobbying activities is a material representation of fact upon which reliance was placed by the tier above when the transaction was made or entered into. This disclosure is required pursuant to 31 U.S.C. 1352. This information will be reported to the Congress semi-annually and will be available for public inspection. Any person who fails to file the required disclosure shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.		
* Signature: <input type="text"/> * Name: Prefix <input type="text"/> * First Name <input type="text"/> Middle Name <input type="text"/> * Last Name <input type="text"/> Suffix <input type="text"/> Title: <input type="text"/> Telephone No.: <input type="text"/> Date: <input type="text"/>		
Federal Use Only		Authorized for Local Reproduction Standard Form - LLL (Rev. 7-97)

## Certification of Payments to Influence Federal Transactions

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

Applicant Name

The Housing Authority of Columbus, Georgia

Program/Activity Receiving Federal Grant Funding

Moving to Work (MTW) Demonstration Program

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

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

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

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

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

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