



ANNUAL MTW REPORT

(FYE 2017: July 1, 2016 – June 30, 2017)

HUD Submission: **September 27, 2017**

HUD Re-Submission: **September 6, 2018**

HUD Acceptance: **September 25, 2018**



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

OFFICE OF 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

SEP 25 2018

Subject: Acceptance of HACG's FY2017 Annual Moving to Work Report

Dear Mr. Williams:

The Department of Housing and Urban Development has completed its review of the Housing Authority of Columbus, Georgia's (HACG) FY2017 Annual MTW Report, which was initially submitted on September 27, 2017, and resubmitted, per HUD's comments, on September 8, 2018. I am writing to inform you that HACG's FY2017 Annual MTW Report, as submitted on September 8, 2018, is accepted.

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

Please contact Alison Christensen, MTW Coordinator, at (202) 402-6231 if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "John Concannon".

Marianne Nazzaro
Moving to Work Program Director
Office of Public Housing Investments

cc: Ada Holloway, Atlanta Field Office

ANNUAL MOVING-TO-WORK (MTW) REPORT

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SECTION I – Introduction

B. OVERVIEW

The Housing Authority of Columbus, Georgia (**HACG**) is a self-regulating Agency, created in 1938, directed by a 7-member Board of Commissioners (**BoC**). The Agency entered into a Moving-to-Work (**MTW**) Agreement with the United States Department of Housing and Urban Development (**HUD**), effective July 3, 2013. HACG is one of 39 MTW Public Housing Agencies (**PHAs**) nationwide.

Annually, HACG submits Plans and Reports to HUD for HUD’s approval and acceptance respectively. This document reports on various accomplishments, progress, and updates of HACG’s ongoing short and long-term goals and objectives, MTW Activities, strategic planning and projects, and other activities from July 1, 2016 through June 30, 2017.

HACG’s senior leadership team prioritized the conversion of Public Housing (**PH**) to Project-Based Voucher (**PBV**) assistance under the Rental Assistance Demonstration (**RAD**) Program. Consequently, HACG spent a massive amount of energy, time, and resources on RAD activities during this reporting period, while delivering housing services.

HACG secured Low-Income Housing Tax Credit (**LIHTC**) funding to meet conversion requirements. With LIHTC funding, and other resources, HACG continued its RAD I Projects¹ modernization process. Meanwhile, with the renovations and construction projects happening simultaneously, HACG rhythmically moved families between transfer and temporary units while exchanging units with the General Contractor (**GC**).

About mid-way through the reporting period, HACG began offering residents, with the right of first refusal, units at completed sites. In line with that accomplishment, HACG leased-up 100% (goal was 95%) of the units for newly completed Patriot Pointe, a mixed-finance, “near”-elderly community.

On the heels of this lease-up achievement is the near completion of Columbus Commons², another mixed-finance community, but for families. Both developments were born of HACG’s site redevelopment efforts of Alvah Chapman and Booker T. Washington Homes.

HACG’s conversion and development experience prompted an internal, localized, best practices, lessons learned consortium to assemble as it prepares for its RAD II Projects³. In addition, the experience increased HACG’s conversion and development capacity, its workforce by 23%, and discussions on acquisition, development, redevelopment, and/or rehabilitation/renovation projects.

Collectively, this period’s activities provide a small sampling of the results of HACG aggressively positioning itself to pursue administrative and financial vehicles to transform

¹ RAD I Projects include 582 units at Farley, EJ Knight, Nicholson, and Wilson sites.

² Projected completion is 2nd quarter of FYE2018

³ Activities included preliminary planning and pre-construction strategies for units at Canty, Chase, and Williams sites.

itself into a recognized industry leader while maintaining a first-choice, housing solution reputation in the Columbus region.

AGENCY SHORT-TERM GOALS AND OBJECTIVES

MTW

- ✓ HACG exercised its single-fund flexibility and monitored MTW Activities for this reporting period. HACG’s MTW Activities and their status are listed below:

Activity Number	Approval Year	Activity Description	Activity Status – June 30
2014.01	2015	Community Choice	Active, data being collected and reported
2014.02	2014	Innovations to Reduce Homelessness	Active, data being collected and reported
2014.03	2014	Administrative Reform	Active, data being collected and reported
2014.04	2014	Administrative Efficiencies	Active, data being collected and reported
2014.05	2014	Streamline Housing Quality Standards (HQS) Inspection	Deactivation proposed, final data collected and reported
2014.06	2014	Rent Reform (Farley)	Active, data being collected and reported
2015.01	2015	Eliminate Child Support Income from Calculation	Deactivation proposed, final data collected and reported
2015.02	2015	Portability Restrictions	Active, data being collected and reported
2015.03	2015	Simplified Utility Allowance Calculations	Active, data being collected and reported
2015.04	2015	Cap Childcare Dependent Deductions	Active, data being collected and reported
2016.01	2016	Next Step Vouchers	Pending referral from local foster care agency
2016.02	2016	Non-Competitive Project-Basing Process	Pending redevelopment construction completion
2016.03	2016	Project-Basing Flexibilities	Pending redevelopment construction completion
2018.01	2018	Eliminate/Reduce Interim Certification Examinations	Pending HUD approval
2018.02	2018	Over-House 1-Bedroom Families in 2-Bedroom Units	Pending HUD approval

- ✓ As part of its MTW goals and objectives, HACG continued to strengthen its relationship with its evaluation partner, Columbus State University (**CSU**). The two entities entered into an agreement, where CSU agreed to evaluate the following activities:
 - 2014.01 – Community Choice: Activity seeks to learn whether the issuance of a higher Tenant-Based Voucher (**TBV**) amount influences and/or impacts where families decide to live. 40 TBVs are restricted to low-poverty areas.
 - 2014.02 – Innovations to Reduce Homelessness: Activity evaluates the influences and/or impacts of MTW Rapid Rehousing Vouchers (**RRVs**) issued to chronically homeless families/individuals
 - 2014.06 – Rent Reform (Farley): Activity measures whether increased minimum rent, a lower calculated rent percentage, and the provision of work incentives influences unemployed families to return to the workforce
 - 2016.01 – Next Step Vouchers (NSVs): Activity seeks to learn the impact of a limited TBV on Foster Youth aging out of Foster Care. TBV limitations include term/time limit, 20-hour self-sufficiency requirement, and light to intense case management
- ✓ Consistent with its business model and portfolio re-shaping, HACG applied or considered applying HUD-Approved MTW Authorizations to current and future projects as applicable:
 - HACG investigated the application of MTW Authorization D.7.a, project-base assistance, at recently completed Patriot Pointe, to nearly completed Columbus Commons, and to future construction projects such as Louis Chase Homes
 - HACG continued to apply MTW Authorizations D.1.c to Housing Choice Voucher (**HCV**) clients holding traditional PBVs and TBVs. The authorization allows HACG to recertify elderly, disabled, and elderly/disabled clients on an every 3-year basis
 - HACG plans to adopt Public and Indian Housing (**PIH**) Notice 2016-05, Streamlining Administrative Regulations for Programs Administered by Public Housing Agencies, Attachment K and L to continue conducting Housing Quality Standards (**HQS**) Inspection every 2-years and assessing re-inspection fees to landlords that fail HQS (2nd re-inspection, 3rd visit)
 - HACG continued to apply all other MTW Authorizations in a manner consistent with the MTW Activity and/or HUD-direction as related to RAD conversions. Detail of MTW Activities and related MTW Authorizations is in Section IV
 - During the reporting period, HACG continued expressions of **interest in becoming a Regional MTW Agency** should such an opportunity become available

Non-MTW

- ✓ HACG received HUD-approval to convert its portfolio of conventional PH units to long-term Section 8 PBV assisted units under RAD. The portfolio conversion includes 1717 units in traditional, centralized communities, as well as mixed-finance communities. The portfolio award motivated HACG to make business model changes as HACG continues to re-position and re-shape its portfolio of rental units in-line with the local demand of affordable housing units.

The final vision for HACG's communities and its overall portfolio stock motivated HACG to secure Low-Income Housing Tax Credit (LIHTC) funding, which is administered through the Georgia Department of Community Affairs (**GA DCA**). The portfolio conversion from PH units to RAD PBV units enabled HACG to access this funding stream to leverage assets for needed renovation work to meet threshold criteria and remain competitive in the affordable housing market.

The use of LIHTC funds, HACG's PH inventory size, and other mentioned factors moved HACG to pursue a phased conversion process of its units and communities. Phase I of the conversion process occurred April 2016. Renovation work to modernize units in accordance with LIHTC threshold criteria and HACG's vision began shortly afterwards, continued throughout FYE2017, and is projected to be completed in FYE2018.

The table below identifies RAD I Projects and their June 30 construction status:

Site	PH Unit Count	Construction Status*
Arbor Pointe I	18	Complete
Arbor Pointe II	18	Complete
The Cottages @ Arbor Pointe	19	Complete
Ashley Station I	73	Complete
Ashley Station II	73	Complete
Brown Nicolson Terrace	100	Complete
E.E. Farley	102	40% Complete
E.J. Knight	92	74% Complete
Luther Wilson	289	40% Complete
RAD I Projects	784	67% Complete

**Source: HACG Real Estate Department*

- ✓ Renovation work occurred throughout FYE2017 and much of the work required empty units. No displacements among families were experienced because of HACG relocating and transferring families to off-site and on-site units.
- ✓ During FYE2017, HACG initiated the offer process to fill renovated units, where existing families were given right of first refusal and then LIHTC eligible, new admission families.

- ✓ Phase II of HACG’s conversion process was initiated during the reporting period. HACG started the application process to secure LIHTC funding for RAD II Projects*. Also initiated during FYE2017 was the planning and pre-construction activities for RAD II Projects that includes the following sites/units:

Site	PH Unit Count
Elizabeth Canty	249
Louis Chase [^]	108
Columbus Commons ^{*^}	31
Patriot Pointe ^{*^}	24
Warren Williams/Rivers	160
RAD II Projects	572

**Source: HACG Real Estate Department*

[^]HACG is also considering a redevelopment effort of this site

^{^}Administrative conversion planned once construction is complete*

- ✓ In accordance with GA DCA’s Qualified Allocation Plan (**QAP**) HACG is required to provide supportive services at family/senior properties. Since renovation work is still in progress, HACG will implement supportive services at family/senior properties during FYE2018 or once work is completed.

GA DCA’s QAP (2016) requires the following supportive services:

Family Property (at least two (2) services from at least two (2) categories)

Senior Property (at least four (4) services from two (2) categories)

1. Social and recreational programs planned and overseen by the project manager (e.g. semi-monthly birthday parties/holiday dinners or parties/potluck dinners, movie nights, bingo)
2. On-site enrichment classes (e.g. arts and crafts, computer tutoring, gardening, safety classes such as CPR and household safety)
3. On-site health classes (e.g. nutrition, healthy cooking, asthma management classes and smoking cessation classes, exercise classes such as yoga, Pilates, strength training, group-led aerobic classes, and/or personal fitness)
4. Other services as approved by DCA (e.g. alternate services for USDA Rural properties with limited community space)

- ✓ HACG offered the Family Self-Sufficiency (**FSS**) and the Resident Opportunities and Self-Sufficiency (**ROSS**) Programs for its conventional PH and RAD PBV residents and its HCV clients respectively.
- ✓ HACG’s ROSS Services Program ended September 2016 as scheduled. Since HACG has or is converting its PH units to Section 8 assisted PBV units, HACG is ineligible for ROSS Program funding because ROSS funds are earmarked for PH units only.

- ✓ HACG provided qualified, active ROSS participants, as of September 2016, an opportunity to “transfer” to HACG’s FSS Program.
- ✓ HACG administered, managed, and/or monitored a variety of rental assistance programs during FYE2017. These programs are designed to help make housing affordable.

The programs are listed below:

Program	Unit Count* as of June 30
HOME	Included in Contract Management
Homeownership Program – Section 8	Included in TBV Program
Low-Income Housing Tax Credits	Included in RAD PBV Program
Project-Based Rental Assistance	88
Project-Based Vouchers	350
Public Housing Assistance	572
RAD Project-Based Vouchers (formerly PH)	784
Section 811 Vouchers	Included in Contract Management
Single-Room Occupancy	60
Tenant-Based Vouchers	1983
Tenant-Protection Vouchers	340
Veteran Affairs Supportive Housing Vouchers	40
Total Unit Count	4,217

**Source: HACG’s Departments; HE Ops, PH Ops, TSO*

- ✓ HACG continued to implement the flat rent mandate in accordance with Public and Indian Housing (PIH) Notice 2014-12 (HA), which requires PHAs to increase the flat rent to 80% of the Fair Market Rent (FMR) throughout its portfolio as applicable.

Category	Bedroom Size					
	0	1	2	3	4	5
2017 FMR* – Columbus, GA-AL MSA	\$605	\$648	\$777	\$1,082	\$1,369	\$1,574
80% of FMR Mandate	\$484	\$518	\$622	\$866	\$1,095	\$1,259

**Effective October 1, 2016; Source: www.huduser.gov*

- ✓ HACG continued to meet affordable housing demand in Columbus, GA through the evolution of its business model, method of operation, and portfolio of rental housing that included
 - the continuance of annual background checks on HCV clients and low-income, mixed-finance community residents
 - the continuance to actively monitor and aggressively pursue affordable housing grants, program, and other mediums that assist HACG in providing safe, affordable housing opportunities to the multiple, diverse communities within its holding portfolio
 - the creation and monitoring of a RAD PBV Wait List in response to HACG’s Choice Mobility obligations under RAD PIH Notice 2012-32 (HA) REV 2. HACG adopted the Alternative Mobility Policy, which requires
 - HACG to reserve 75% of its turnover TBVs for RAD PBV families and issue the remaining 25% for new admissions (off the TBV Wait List)

The Wait Lists managed by HACG during FYE2017 are listed below:

Wait List Name (Program)	Sites (Type)	Applicant Count* as of June 30
Public Housing	Canty (Family), Chase (Family), Warren Williams (Family)	3047
RAD PBV Housing	Farley (Family), EJ Knight (Family), EJ Knight Senior (Elderly), Nicholson (Elderly/Disabled), Wilson (Family)	2605
Mixed-Finance	Arbor Pointe I & II (Family), Cottages @ Arbor Pointe (Elderly/Disabled), Ashley I (Family), Ashley II (Elderly/Disabled), Patriot Pointe (“near” Elderly/Disabled)	3333
Business Activities	Columbus Villas (Family), Gentian Oaks (Family), Willow Glen (Disabled, PSH)	95
Contract Management	Buena Vista (Family), Ellaville (Family), Harris County (Family), Legacy Terrace (Elderly), West Point (Family)	420
Housing Choice Voucher	Tenant-Based Vouchers, including Community Choice, Next Step, and Rapid Rehousing Vouchers	757
All HACG Wait List Programs		10,257

**Source: Yardi Waiting List Generation*

✓ HACG oversaw unit utilization meet or exceed internal goals at managed or owned sites.

The table below reflects HACG’s unit utilization performance:

Program	Goal*	Average as of June 30	3-Year Average as of June 30
Conventional PH and RAD PBV Housing (former PH units)	99%	95%	99%
Business Activities	95%	95%	92%
Mixed-Finance	95%	97%	96%
Housing Choice Vouchers	90%	87%	87%

*HACG’s Strategic Plan and/ or MTW Agreement with HUD
 ^HACG’s Performance Report

As a note of interest, **Patriot Pointe**, a 100-unit “near” elderly community, **was 100% leased-up as of June 30**. This is noteworthy because the community is designed for residents 55 years old and older⁴ and includes 19 2-bedroom units and 5 market-rate units (rental programs map out as 71 HCV units and 24 PH units).

HACG retains high hopes for similar success at its newest development, Columbus Commons, which is a 106-unit family site. Columbus Commons replaces the north end of Booker T. Washington Homes (rental programs map out as 60 HCV units, 31 PH units, and 15 market-rate units).

Construction of the site is nearly completed to the point so that HACG began accepting applications for tenancy on April 17, 2017. HACG is encouraged by the initial interest. Preliminary analysis is tabled below:

Days	Applications per Day	Applications per Unit
74	13	9

*Source: HACG’s Housing Enterprise Operations Department

Further, Columbus Commons includes a priority preference for “targeted individuals”. “Targeted individuals” are the result of the Olmstead Settlement Agreement reached by the State of Georgia and the US Department of Justice (**DOJ**). HACG will reserve up to 15 units for beneficiaries of the Olmstead Settlement Agreement. The State of Georgia will refer these individuals at no additional operating costs to the Columbus Commons development.

⁴ GA DCA Land Use Restrictive Covenant (**LURC**)

While construction of Columbus Commons will complete in FYE2018, HACG continued to strengthen its relationship with New Horizons, a local supportive services provider. HACG has an active Memorandum of Agreement/Understanding (MOA/U) with New Horizons to provide the needed supportive services to “targeted individuals” at Columbus Commons at no cost to the site owner/limited partnership.

- ✓ Once construction is completed at Columbus Commons, HACG will apply MTW Authorization D.7.e that allows HACG to waive the requirement to mandate supportive services at excepted units (units above the cap) at Columbus Commons in FYE2018

Note: HACG will provide supportive services at Columbus Commons; however, offered supportive services will be strongly encouraged in its marketing, not mandated or required.

Because Columbus Commons was born of HACG’s redevelopment of Booker T. Washington Homes, HACG was issued 340 Tenant-Protection Vouchers (**TPVs**) to assist HACG in the relocation of displaced Booker T. Washington Homes residents. After 12-months, a TPV becomes a part of HACG’s voucher pool.

- ✓ Since TPVs were issued at various times, HACG converted TPVs to its voucher pool as applicable during FYE2017

AGENCY LONG-TERM GOALS AND OBJECTIVES

MTW

HACG's long-term goals and objectives continue to include maximizing outcomes of its MTW Activities that will help the Agency to continue to deliver housing services at a high-level, as well as conduct research to address local nuances in the delivery of housing services.

HACG anticipates the continuance of the approved MTW Activities beyond the next year:

Activity Number	Approval Year	Activity Description
2014.01	2015	Community Choice
2014.02	2014	Innovations to Reduce Homelessness
2014.03	2014	Administrative Reform
2014.04	2014	Administrative Efficiencies
2014.06	2014	Rent Reform (Farley)
2015.02	2015	Portability Restrictions
2015.03	2015	Simplified Utility Allowance Calculations
2015.04	2015	Cap Childcare Dependent Deductions
2016.01	2016	Next Step Vouchers
2016.02	2016	Non-Competitive Project-Basing
2016.03	2016	Project-Basing Flexibilities
2018.01	2018	Eliminate/Reduce Interim Certification Examinations
2018.02	2018	Over-House 1-Bedroom Families in 2-Bedroom Units

Additionally, HACG anticipates using MTW Authorizations to provide necessary flexibilities to retain Farley as its MTW test site and Chase as its MTW comparison/control site. As such, HACG planned expanding discussions for Farley activities introduced in prior plans: Education, Employment, and Health. HACG's focus on its RAD conversions, modernization projects, and similar activities commanded HACG's focus during FYE2017.

HACG conducted a “Mini”-Staff Retreat⁵ in FYE2017. These “Mini”-Staff Retreats have produced MTW Activities for future consideration:

- ✓ Eliminate/Reduce Utility Reimbursement Payments (URPs) – increase the minimum rent, implement a work requirement, and setting a threshold check amount were potential solutions researched during FYE2017
- ✓ Homeownership Program for PH (including RAD PBV sites) residents
- ✓ Housing expansion opportunities for under-served segment of the population – custodial male parents, ex-offenders, family reunification, and similar “specialty”-typed housing
- ✓ Time limited housing – introduced for Foster Youth in FYE2016; discussed to include victims of minor disasters or provision of a partial subsidy
- ✓ Workforce Housing community – location, new construction versus existing structure and rehabilitation/renovation, and other factors have been discussed

Non-MTW

HACG’s Strategic Plan lists an assortment of long-term goals and objectives, which are highlighted below to provide a sense of HACG’s vision:

- ✓ Measure customer satisfaction among HACG voucher families, site residents, and landlord partners
- ✓ Measure employee satisfaction among HACG regular, durational, and contracted employee partners
- ✓ Conduct feasibility studies into the acquisition and/or development of affordable housing, including repositioning existing properties to project-based assistance, mixed-finance opportunities, Choice Neighborhood Initiatives, or major redevelopment projects
- ✓ Increase information sessions with residents regarding modernization/renovation and rehabilitation construction activities when relocation is necessary to mitigate impact and confusion among resident population
- ✓ Expand and strengthen community partnerships to enhance the quality of life for HACG residents
 - Coordinate/increase homeownership opportunities for eligible HACG residents
 - Coordinate/increase educational trainings and employment opportunities for HACG families
 - Coordinate/increase social services for elderly and/or disabled HACG residents
 - Improve self-sufficiency/supportive services programming at conventional, converted, and mixed-finance sites for low to moderate-income families
 - Work closer with law enforcement agencies, residents and community partners in developing strategies for addressing crime issues on and near HACG communities

⁵ “Mini”-Staff Retreats held annually since HACG’s MTW inception (FYE2014)

- ✓ Provide excellent asset management services for privately managed affordable housing programs
 - Provide prompt, accurate, and courteous inspection services for residents and landlords in the HCV Program
 - Ensure HCV Program maintains voucher utilization of 90%⁶ or greater
- ✓ Maintain and grow current sources of non-federal revenues
- ✓ Develop new sources of non-federal revenues
- ✓ Develop and retain a professional, highly motivated, diverse workforce
- ✓ Provide superior management and consulting services to HACG clients and PHA peers

HACG will pursue designation as a Regional MTW Agency, should such an opportunity present itself. This designation, should it present itself, would allow HACG to strategically expand its management consulting and property management capacity.

Having the ability to convert its entire PH portfolio from PH units to PBV units under the RAD Program allowed HACG to strategically expand and/or reposition its existing portfolio of rental housing within the context of the local real estate market to meet the demand for affordable housing in Columbus. As such, HACG leveraged private and public debt and equity to make capital improvements to its buildings. These improvements will allow HACG to extend the same basic rights to low-income families as they possessed in the PH Program, allow HACG to offer affordable units to low-income families as they offered in the PH Program, and allow HACG to remain competitive and relevant in the affordable housing market throughout the MTW Agreement period as they had prior to conversion.

Consistent with its initial conversion phase, HACG continues plans to take advantage of LIHTC funding to assist it in meeting capital investing needs for its remaining PH units.

HACG’s remaining PH units are listed below:

Project Number	Project Name	Unit Count*	Property Type
GA 004000405	Warren Williams	157	Family
	George Rivers	24	Elderly/Disabled
GA 004000407	Louis Chase	108	Family
GA 004000408	Elizabeth Canty	248	Family
GA 004000423	Patriot Pointe	24	“Near” Elderly
GA 004000424	Columbus Commons [^]	31	Family
Totals		592	All Types

**Source: HACG’s HE Ops, PH Ops, and Real Estate Departments
[^]~83% complete as of June 30, 2017 per HACG’s Real Estate Department*

⁶ Pursuant to MTW Extension Agreement

HACG continues to maintain management contracts with neighboring PHAs (tabled below) and continually seeks to establish collaborative opportunities with area PHAs for management and consulting services.

PHA Partner	# of Sites/Buildings	Unit Count	Approximate 1-way Distance
Housing Authority of the City of Buena Vista, GA	5	79	34 miles
Housing Authority of the City of Ellaville, GA	4	40	50
Housing Authority of the City of West Point, GA	5	223	38
Housing Authority of the County of Harris, GA	6	43	28
Totals	20	385	150 miles

HACG continues to seek a replacement program since it dissolved its ROSS Program because HACG is approved to convert its entire PH portfolio from PH units to PBV units. The ROSS Program had to be dissolved because program statute limits ROSS funding to PH units and conversion activity removes PH units from HACG's rental portfolio.

SECTION II – General Housing Authority Operating Information

A. MTW Report: Housing Stock Information			
New Housing Choice Vouchers that were Project-Based During the Fiscal Year			
Property Name	Anticipated Number of New Vouchers to be Project-Based *	Actual Number of New Vouchers that were Project-Based	Description of Project
Patriot Pointe	71	0	Redevelopment project of Booker T. Washington Homes. Mixed-finance project includes PH units and market units as well
Columbus Commons	60	0	Redevelopment project of Booker T. Washington Homes. Mixed-finance project includes PH units and market units as well
	0	0	N/A
	0	0	N/A

Anticipated Total Number of New Vouchers to be Project-Based *	Actual Total Number of New Vouchers that were Project-Based	Anticipated Total Number of Project-Based Vouchers Committed at the End of the Fiscal Year *	Anticipated Total Number of Project-Based Vouchers Leased Up or Issued to a Potential Tenant at the End of the Fiscal Year *
131	0	1063	1063
		Actual Total Number of Project-Based Vouchers Committed at the End of the Fiscal Year	Actual Total Number of Project-Based Vouchers Leased Up or Issued to a Potential Tenant at the End of the Fiscal Year
		1134	982

* From the Plan

Other Changes to the Housing Stock that Occurred During the Fiscal Year
During FYE2017, HACG initiated plans to implement the second phase of its conversion process.
Columbus Commons, the redevelopment offspring of Booker T. Washington Homes, was not completed by June 30, 2017. It is projected to be completed during the second quarter of FYE2018.
Consistent with its method of operation in FYE2016, HACG intentionally delayed the leasing and issuing of units and vouchers respectively in anticipation of relocating residents impacted by renovation construction and/or the RAD conversion process (creation of RAD PBV Wait List)

Examples of the types of other changes can include but are not limited to units that are held off-line due to the relocation of residents, units that are off-line due to substantial rehabilitation and potential plans for acquiring units.

General Description of Actual Capital Fund Expenditures During the Plan Year

During the course of FY2017, HACG expended \$3,333,476 in Capital Funds. Expenditures were made in concert with ongoing modernization and redevelopment projects at converted PH sites (to RAD PBV) and HACG's Booker T. Washington site. Examples of expenditures included property condition assessments, environmental reviews, consultants for developing tax credit applications, site improvement activities such as erosion controlling retaining walls, hazardous material abatement, and similar activities in preparation to continue and/or complete renovations and construction at converted and redeveloped sites.

Overview of Other Housing Owned and/or Managed by the PHA at Fiscal Year End

Housing Program *	Total Units	Overview of the Program
Tax Credit	48	HACG directly/indirectly owns and manages mixed-finance sites converted, constructed, and/or renovated with tax credit funding
Locally Funded, Market Rate	293	HACG directly/indirectly owns and manages market rate units throughout the city and is contracted to manage units for the city
Non-MTW HUD Funded	88	HACG directly owns and manages Columbus Villas, a multi-family Project-Based Rental Assistance (PBRA) site
Managing Developments for other non-MTW PHAs	385	HACG is contracted to manage all aspects of 4 neighboring non-MTW Public Housing Authorities (PHAs)
Total Other Housing Owned and/or Managed	814	

* Select Housing Program from: Tax-Credit, State Funded, Locally Funded, Market-Rate, Non-MTW HUD Funded, Managing Developments for other non-MTW Public Housing Authorities, or Other.

If Other, please describe:

N/A

B. MTW Report: Leasing Information

Actual Number of Households Served at the End of the Fiscal Year

Housing Program:	Number of Households Served*	
	Planned	Actual
Number of Units that were Occupied/Leased through Local Non-Traditional MTW Funded Property-Based Assistance Programs **	0	0
Number of Units that were Occupied/Leased through Local Non-Traditional MTW Funded Tenant-Based Assistance Programs **	0	0
Port-In Vouchers (not absorbed)	N/A	0
Total Projected and Actual Households Served	0	0

* Calculated by dividing the planned/actual number of unit months occupied/leased by 12.

** In instances when a Local, Non-Traditional program provides a certain subsidy level but does not specify a number of units/Households Served, the PHA should estimate the number of Households served.

Housing Program:	Unit Months Occupied/Leased****	
	Planned	Actual
Number of Units that were Occupied/Leased through Local Non-Traditional MTW Funded Property-Based Assistance Programs ***	0	0
Number of Units that were Occupied/Leased through Local Non-Traditional MTW Funded Tenant-Based Assistance Programs ***	0	0
Port-In Vouchers (not absorbed)	N/A	0
Total Projected and Annual Unit Months Occupied/Leased	0	0

N/A

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

**** Unit Months Occupied/Leased is the total number of months the housing PHA has occupied/leased units, according to unit category during the year.

	Average Number of Households Served Per Month	Total Number of Households Served During the Year
Households Served through Local Non-Traditional Services Only	N/A	N/A

Because HUD will verify compliance with the statutory objective of “assuring that at least 75 percent of the families assisted by the Agency are very low-income families”, and HACG does not provide any local, non-traditional families with housing assistance not reported in PIC or its successor system, HACG omits the **Reporting Compliance with Statutory MTW Requirements: 75% of Families Assisted are Very Low-Income Table**.

The remaining charts and visual graphics required by Form 50900 continue below.

Reporting Compliance with Statutory MTW Requirements: Maintain Comparable Mix					
In order to demonstrate that the statutory objective of “maintaining a comparable mix of families (by family size) are served, as would have been provided had the amounts not been used under the demonstration” is being achieved, the PHA will provide information in the following formats:					
Baseline for the Mix of Family Sizes Served					
Family Size:	Occupied Number of Public Housing units by Household Size when PHA Entered MTW	Utilized Number of Section 8 Vouchers by Household Size when PHA Entered MTW	Non-MTW Adjustments to the Distribution of Household Sizes *	Baseline Number of Household Sizes to be Maintained	Baseline Percentages of Family Sizes to be Maintained
1 Person	714	690	0	1404	34.9%
2 Person	356	416	0	772	19.2%
3 Person	280	542	0	822	20.4%
4 Person	196	374	0	570	14.2%
5 Person	102	197	0	299	7.4%
6+ Person	40	114	0	154	3.8%
Totals	1688	2333	0	4021	100%
Explanation for Baseline Adjustments to the Distribution of Household Sizes Utilized	N/A				

Mix of Family Sizes Served

	1 Person	2 Person	3 Person	4 Person	5 Person	6+ Person	Totals
Baseline Percentages of Household Sizes to be Maintained **	34.9%	19.2%	20.4%	14.2%	7.4%	3.8%	100%
Number of Households Served by Family Size this Fiscal Year ***	1252	605	677	471	222	164	3391
Percentages of Households Served by Household Size this Fiscal Year ****	36.9%	17.8%	20.0%	13.9%	6.5%	4.8%	100%
Percentage Change	-2.0%	1.4%	0.5%	0.3%	0.9%	-1.0%	0%

Justification and Explanation for Family Size Variations of Over 5% from the Baseline Percentages

N/A

* "Non-MTW adjustments to the distribution of family sizes" are defined as factors that are outside the control of the PHA. Acceptable "non-MTW adjustments" include, but are not limited to, demographic changes in the community's population. If the PHA includes non-MTW adjustments, HUD expects the explanations of the factors to be thorough and to include information substantiating the numbers used.

** The numbers in this row will be the same numbers in the chart above listed under the column "Baseline percentages of family sizes to be maintained."

*** The methodology used to obtain these figures will be the same methodology used to determine the "Occupied number of Public Housing units by family size when PHA entered MTW" and "Utilized number of Section 8 Vouchers by family size when PHA entered MTW" in the table immediately above.

**** The "Percentages of families served by family size this fiscal year" will reflect adjustments to the mix of families served that are directly due to decisions the PHA has made. HUD expects that in the course of the demonstration, PHAs will make decisions that may alter the number of families served.

Description of any Issues Related to Leasing of Public Housing, Housing Choice Vouchers or Local, Non-Traditional Units and Solutions at Fiscal Year End		
Housing Program	Description of Leasing Issues and Solutions	
Housing Choice Vouchers - Tenant-Based Vouchers	Although HACG did not experience any leasing issues, HACG did delay issuing TBVs to ensure existing PH residents impacted by HACG's conversion and redevelopment efforts were housed. HACG adopted the Alternative Mobility Policy, which reserves 25% of turnover TBVs for new TBV admissions	
Housing Choice Vouchers - RAD PBV (formerly PH)	HACG did not experience any leasing issues under this program, which is born of HACG's conversion activities under the RAD Program and its adoption of the Alternative Mobility Policy, which reserves 75% of turnover TBVs for RAD PBV families	
Public Housing - Conventional	The primary leasing issues within this program centers on HACG's conversion activities and ensuring eligible families are in "correct" units (e.g., HUD subsidized, market, Tax Credit, etc.)	
Number of Households Transitioned To Self-Sufficiency by Fiscal Year End		
Activity Name/#	Number of Households Transitioned *	Agency Definition of Self Sufficiency
Community Choice/2014.01	11	120% HOHs increase EI by 3% annually
Innovations to Reduce Homelessness/2014.4	17	12 mos of stability; 24 mos of case
Rent Reform (Farley)/2014.06	3	Employed for 24 consecutive months
Next Step Vouchers/2016.01	0	Complete Case Management (36 mos)
Households Duplicated Across Activities/Definitions	0	* The number provided here should match the outcome reported where metric SS #8 is used.
ANNUAL TOTAL NUMBER OF HOUSEHOLDS TRANSITIONED TO SELF SUFFICIENCY	31	

C. MTW Report: Wait List Information

Wait List Information at Fiscal Year End				
Housing Program(s) *	Wait List Type **	Number of Households on Wait List	Wait List Open, Partially Open or Closed ***	Was the Wait List Opened During the Fiscal Year
Federal MTW Housing Choice Voucher Program - Tenant-Based Vouchers (TBVs)	Community-Wide	747	Closed	Yes
Federal MTW Public Housing (PH) Program - Conventional PH	Community-Wide	3047	Open	Yes
Federal MTW Housing Choice Voucher Program - Project-Based Vouchers (PBVs)	Program Specific - Rental Assistance Demonstration (RAD PBVs)	2605	Open	Yes
Federal MTW Housing Choice Voucher Program - Specialty PBVs	Program Specific - Permanent Supportive Housing (PSH PBVs)	11	Partially Open	Yes
Federal MTW Housing Choice Voucher Program - Specialty TBVs	Program Specific - Next Step Vouchers (NSVs)	0	Partially Open	Yes
Federal MTW Housing Choice Voucher Program - Specialty TBVs	Program Specific - Rapid Rehousing Vouchers (RRVs)	0	Partially Open	Yes
Federal non-MTW Housing Choice Voucher Program - Mixed-Finance	Site-Based	3333	Open	Yes
Federal non-MTW Housing Choice Voucher Program - Project-Based Rental Assistance (PBRA)	Site-Based	84	Partially Open	Yes

More can be added if needed.

* *Select Housing Program* : Federal MTW Public Housing Units; Federal MTW Housing Choice Voucher Program; Federal non-MTW Housing Choice Voucher Units; Tenant-Based Local, Non-Traditional MTW Housing Assistance Program; Project-Based Local, Non-Traditional MTW Housing Assistance Program; and Combined Tenant-Based and Project-Based Local, Non-Traditional MTW Housing Assistance Program.

** *Select Wait List Types*: Community-Wide, Site-Based, Merged (Combined Public Housing or Voucher Wait List), Program Specific (Limited by HUD or Local PHA Rules to Certain Categories of Households which are Described in the Rules for Program Participation), None (If the Program is a New Wait List, Not an Existing Wait List), or Other (Please Provide a Brief Description of this Wait List Type).

*** For Partially Open Wait Lists, provide a description of the populations for which the waiting list is open.

Although not listed as partially open, HACG uses the Federal MTW HCV Program list to recruit/replace volunteer families in its Community Choice MTW Activity. These families are assigned to the Community-Wide, Location Restricted, or Comparison/Control Evaluation Group.

Program specific Wait Lists are considered Partially Open Wait Lists because they serve specific populations within HACG's jurisdictional service area on a referral basis.

A portion of the site-based Wait List is considered a Partially Open Wait List because the property is accepting applications for 1 and 2-bedroom units only. As the Wait List is purged during FYE2018, the property may accept 3-bedroom applications.

If Local, Non-Traditional Program, please describe:

N/A
N/A
N/A

If Other Wait List Type, please describe:

N/A
N/A
N/A

If there are any changes to the organizational structure of the wait list or policy changes regarding the wait list, provide a narrative detailing these changes.

Overall, HACG did not make any changes to the organization structure of the Wait List or policy changes. However, HACG points out that it adopted the Alternative Mobility Policy in accordance with PIH Notice 2012-32 (HA) REV 2. Under this policy, HACG is authorized to reserve 75% of its turnover TBVs for RAD PBV families (formerly conventional PH families) and reserve the balance for new admissions. Meanwhile, HACG continues to explore Wait List options that promote efficiency and effectiveness for the agency, as well as equity and fairness for Wait List families.

SECTION III – **Proposed MTW Activities**

All proposed activities that are granted approval by HUD are reported on in Section IV as Approved Activities

SECTION IV – Approved MTW Activities

A. Implemented Activities

Activity **2014.01 – Community Choice** was introduced in HACG’s FYE2014 Annual MTW Plan, but needed to be re-proposed due to the significant changes in the activity. This activity was re-proposed and approved in HACG’s FYE2015 Annual MTW Plan and implemented in the same fiscal year.

HACG uses MTW Authorizations D.2.a and D.2.b listed in Attachment C of the MTW Agreement to study the impact and influences of a higher valued voucher through 3 evaluation groups of Tenant-Based Voucher (TBV) holding families. Under the MTW Authorizations, HACG modifies the payment standards above the currently mandated program requirements to 120% for two evaluation groups and modifies the content of the contract rental agreements that differ from the currently mandated program requirements to restrict one evaluation group to low-poverty census tracts. The third evaluation group is left unaltered and serves as the comparison/control group.

The activity seeks to learn if the higher issued voucher (120% of Fair Market Rent (FMR)) and/or the restriction to low-poverty areas of the city significantly impact social factors of the volunteering families and/or influence decisions on areas the families choose. The evaluation groups are outlined below:

Evaluation Group	Flexibility	Comments
Community-Wide	40 TBVs at 120%	No restrictions
Location Restricted	40 TBVs at 120%	Restricted to low-poverty areas identified by HACG
Comparison/Control	None	40 TBVs at normal issuance (90% of FMR)

As of June 30, 2017, the positive impacts of this activity include the promotion of socio-economic diversity in Columbus, where there is not a concentrated effort to do so. Also, the activity allows up to 80 low-income families to access low-poverty areas of the city and the perceived and real amenities associated with living in low-poverty areas of any city in the nation. Additional positive impacts of the activity include overcoming a series of challenges involving finding enough families to volunteer in the study, especially the Location Restricted and Comparison/Control Evaluation Groups. Since the activity’s introduction in FY2014, HACG has successfully overcome these challenges to “field” evaluation groups.

Tabled below are selected agency metrics.

Evaluation Group	Median Age	HOH Size	# Work-Able	# w/Earned Income	Avg. Earned Income	Avg. Mthly Rent	In Low-Poverty
Community-Wide	32	3.3	42	18	\$15,914	\$84	4
Location Restricted	30	3.3	37	23	\$15,576	\$173	36
Comparison / Control	30	3.9	43	16	\$17,376	\$172	6

Lesson learned from the implementation and monitoring of this activity includes the tracking and restricting strategies associated with the Location Restricted Group. Although HACG identified 16 low-poverty, high-opportunity areas, the agency does not possess custom written software, nor has it developed any proprietary software that assist case workers in ensuring census tract compliance for Location Restricted families that relocate at lease end.

Without the right tool for the job, the assurance process can be time consuming, frustrating, and awkward for all parties involved in the process. Nonetheless, HACG's HCV case workers have done an excellent job of illustrating restricted areas to these families.

The table below indicates an agency metric that tracks the number of families in low-poverty areas of opportunity since approval of the activity.

Evaluation Group	CT* Count 2015 (start)	CT Count 2015 (end)	% Change	CT Count 2016	% Change	CT Count 2017	% Change
Community-Wide	4	5	25%	5	0%	4	-20%
Location Restricted [^]	3	18	500%	37	106%	36	-3%
Comparison / Control	2	2	0%	6	200%	6	0%

**CT = Census Tract*

[^]100% are restricted to low-poverty areas identified by HACG

This activity does not meet the definition of rent reform.

HUD Standard Metrics for HACG’s Community Choice MTW Activity:

SS #1: Increase in Household Income				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average earned income of households affected by this policy in dollars (increase).	Average earned income of households affected by this policy prior to implementation of the activity (in dollars).	Expected average earned income of households affected by this policy prior to implementation of the activity (in dollars).	Actual average earned income of households affected by this policy prior to implementation (in dollars).	Whether the outcome meets or exceeds the benchmark.
Community-Wide Group Vouchers are 120% of Fair Market Rent (FMR)	Earned income of households affected by this policy = \$14,392,968 Number of households affected by this policy = 2,322 Average Earned Income of Households Affected by this Policy Prior to Implementation of the Activity \$ 6,199 average earned income	Expected earned income of households affected by this policy = \$391,608 Expected number of households affected by this policy = 40 Expected Average Earned Income of Households Affected by this Policy After Implementation of the Activity \$ 9,790 average earned income	Actual earned income of households affected by this policy = \$286,453 Actual number of households affected by this policy = 40 Actual Average Earned Income of Households Affected by this Policy After Implementation of the Activity \$ 7,161 average earned income	Not Achieved
Location Restricted Group - Vouchers are 120% of FMR & Restricted to Low Poverty Areas	Earned income of households affected by this policy = \$14,392,968 Number of households affected by this policy = 2,322 Average Earned Income of Households Affected by this Policy Prior to Implementation of the Activity \$ 6,199 average earned income	Expected earned income of households affected by this policy = \$391,608 Expected number of households affected by this policy = 40 Expected Average Earned Income of Households Affected by this Policy After Implementation of the Activity \$ 9,790 average earned income	Actual earned income of households affected by this policy = \$358,238 Actual number of households affected by this policy = 39 Actual Average Earned Income of Households Affected by this Policy After Implementation of the Activity \$ 9,186 average earned income	Not Achieved
Control Group - Vouchers are Issued in Accordance with Payment Standards	Earned income of households affected by this policy = \$14,392,968 Number of households affected by this policy = 2,322 Average Earned Income of Households Affected by this Policy Prior to Implementation of the Activity \$ 6,199 average earned income	Expected earned income of households affected by this policy = \$391,608 Expected number of households affected by this policy = 40 Expected Average Earned Income of Households Affected by this Policy After Implementation of the Activity \$ 9,790 average earned income	Actual earned income of households affected by this policy = \$278,022 Actual number of households affected by this policy = 39 Actual Average Earned Income of Households Affected by this Policy After Implementation of the Activity \$ 7,129 average earned income	Not Achieved

SS #3: Increase in Positive Outcomes in Employment Status

Report the Baseline, Benchmark and Outcome data for each type of employment status for those head(s) of households affected by the self-sufficiency activity.

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Report the following information separately for each category:				
(1) Employed Full- Time	Head(s) of households in <<category name>> prior to implementation of the activity (number). This number may be zero.	Expected head(s) of households in <<category name>> after implementation of the activity (number).	Actual head(s) of households in <<category name>> after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
(2) Employed Part- Time				
(3) Enrolled in an Educational Program				
(4) Enrolled in Job Training Program				
(5) Unemployed				
(6) Other				
	Percentage of total work-able households in <<category name>> prior to implementation of activity (percent). This number may be zero.	Expected percentage of total work-able households in <<category name>> after implementation of the activity (percent).	Actual percentage of total work-able households in <<category name>> after implementation of the activity (percent).	Whether the outcome meets or exceeds the benchmark.

SS #3: Increase in Positive Outcomes in Employment Status - Community-Wide

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
(1) Employed Full- Time	<p>Number of work-able (19-61) households in the control group = 946</p> <p>Number of work-able (19-61) households Employed Fulltime in the control group = 224</p> <p>Percentage of Community-Wide Work-Able Households <u>Employed Fulltime</u> Prior to Implementation of the Activity</p> <p align="center">23.7%</p> <p align="center">employed fulltime</p>	<p>Expected number of work-able (19-61) households in the Community-Wide Group = 40</p> <p>Expected number of work-able (19-61) households Employed Fulltime in the Community-Wide Group = 9</p> <p>Expected Percentage of Community-Wide Work-Able Households <u>Employed Fulltime</u> After Implementation of the Activity</p> <p align="center">23.7%</p> <p align="center">employed fulltime</p>	<p>Actual number of work-able (19-61) households in the Community-Wide Group = 42</p> <p>Actual number of work-able (19-61) households Employed Fulltime in the Community-Wide Group = 10</p> <p>Actual Percentage of Community-Wide Work-Able Households <u>Employed Fulltime</u> After Implementation of the Activity</p> <p align="center">23.8%</p> <p align="center">employed fulltime</p>	Exceeds Benchmark
(2) Employed Part- Time	<p>Number of work-able (19-61) households in the restricted group = 946</p> <p>Number of work-able (19-61) households Employed Part Time in the restricted group = 256</p> <p>Percentage of Community-Wide Work-Able Households <u>Employed Part Time</u> Prior to Implementation of the Activity</p> <p align="center">27.1%</p> <p align="center">employed part time</p>	<p>Expected number of work-able (19-61) households in the Community-Wide Group = 40</p> <p>Expected number of work-able (19-61) households Employed Part Time in the Community-Wide Group = 11</p> <p>Expected Percentage of Community-Wide Work-Able Households <u>Employed Part Time</u> After Implementation of the Activity</p> <p align="center">27.1%</p> <p align="center">employed part time</p>	<p>Actual number of work-able (19-61) households in the Community-Wide Group = 42</p> <p>Actual number of work-able (19-61) households Employed Fulltime in the Community-Wide Group = 8</p> <p>Actual Percentage of Community-Wide Work-Able Households <u>Employed Part Time</u> After Implementation of the Activity</p> <p align="center">19.0%</p> <p align="center">employed part time</p>	No
(5) Unemployed	<p>Number of work-able (19-61) households in the restricted group = 946</p> <p>Number of work-able (19-61) households Unemployed in the restricted group = 372</p> <p>Percentage of Community-Wide Work-Able Households <u>Unemployed</u> Prior to Implementation of the Activity</p> <p align="center">39.3%</p> <p align="center">unemployed</p>	<p>Expected number of work-able (19-61) households in the community-wide group = 40</p> <p>Expected number of work-able (19-61) households Unemployed in the community-wide group = 16</p> <p>Expected Percentage of Community-Wide Work-Able Households <u>Unemployed</u> After Implementation of the Activity</p> <p align="center">39.3%</p> <p align="center">unemployed</p>	<p>Actual number of work-able (19-61) households in the Community-Wide Group = 42</p> <p>Actual number of work-able (19-61) households Unemployed in the Community-Wide Group = 18</p> <p>Actual Percentage of Community-Wide Work-Able Households <u>Unemployed</u> After Implementation of the Activity</p> <p align="center">42.9%</p> <p align="center">unemployed</p>	No

SS #3: Increase in Positive Outcomes in Employment Status - Restricted Vouchers

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
(1) Employed Full- Time	<p>Number of work-able (19-61) households in the Restricted Group = 946</p> <p>Number of work-able (19-61) households Employed Fulltime in the Restricted Group = 224</p> <p>Percentage of Location Restricted Work-Able Households <u>Employed Fulltime</u> Prior to Implementation of the Activity</p> <p align="center">23.7%</p> <p align="center">employed fulltime</p>	<p>Expected number of work-able (19-61) households in the Restricted Group = 32</p> <p>Expected number of work-able (19-61) households Employed Fulltime in the Restricted Group = 8</p> <p>Expected Percentage of Location Restricted Work-Able Households <u>Employed Fulltime</u> After Implementation of the Activity</p> <p align="center">23.7%</p> <p align="center">employed fulltime</p>	<p>Actual number of work-able (19-61) households in the Restricted Group = 37</p> <p>Actual number of work-able (19-61) households Employed Fulltime in the Restricted Group = 12</p> <p>Actual Percentage of Location Restricted Work-Able Households <u>Employed Fulltime</u> After Implementation of the Activity</p> <p align="center">32.4%</p> <p align="center">employed fulltime</p>	Exceeds Benchmark
(2) Employed Part- Time	<p>Number of work-able (19-61) households in the Restricted Group = 946</p> <p>Number of work-able (19-61) households Employed Part time in the Restricted Group = 256</p> <p>Percentage of Restricted Work-Able Households <u>Employed Part Time</u> Prior to Implementation of the Activity</p> <p align="center">27.1%</p> <p align="center">employed part time</p>	<p>Expected number of work-able (19-61) households in the Restricted Group = 32</p> <p>Expected number of work-able (19-61) households Employed Part time in the Restricted Group = 9</p> <p>Expected Percentage of Restricted Work-Able Households <u>Employed Part Time</u> After Implementation of the Activity</p> <p align="center">27.1%</p> <p align="center">employed part time</p>	<p>Actual number of work-able (19-61) households in the Restricted Group = 37</p> <p>Actual number of work-able (19-61) households Employed Part time in the Restricted Group = 11</p> <p>Actual Percentage of Restricted Work-Able Households <u>Employed Part Time</u> After Implementation of the Activity</p> <p align="center">29.7%</p> <p align="center">employed part time</p>	Exceeds Benchmark
(5) Unemployed	<p>Number of work-able (19-61) households in the Restricted Group = 946</p> <p>Number of work-able (19-61) households Unemployed in the Restricted Group = 372</p> <p>Percentage of Restricted Work-Able Households <u>Unemployed</u> Prior to Implementation of the Activity</p> <p align="center">39.3%</p> <p align="center">unemployed</p>	<p>Expected number of work-able (19-61) households in the Restricted Group = 32</p> <p>Number of work-able (19-61) households Unemployed in the Restricted Group = 13</p> <p>Expected Percentage of Restricted Work-Able Households <u>Unemployed</u> After Implementation of the Activity</p> <p align="center">39.3%</p> <p align="center">unemployed</p>	<p>Actual number of work-able (19-61) households in the Restricted Group = 37</p> <p>Number of work-able (19-61) households Unemployed in the Restricted Group = 12</p> <p>Actual Percentage of Restricted Work-Able Households <u>Unemployed</u> After Implementation of the Activity</p> <p align="center">32.4%</p> <p align="center">unemployed</p>	Exceeds Benchmark

SS #3: Increase in Positive Outcomes in Employment Status - Control Group

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
(1) Employed Full- Time	<p>Number of work-able (19-61) households in the Control Group = 946</p> <p>Number of work-able (19-61) households Employed Fulltime in the Control Group = 224</p> <p>Percentage of Control Work-Able Households <u>Employed Fulltime</u> Prior to Implementation of the Activity</p> <p align="center">23.7%</p> <p align="center">employed fulltime</p>	<p>Expected number of work-able (19-61) households in the Control Group = 32</p> <p>Expected number of work-able (19-61) households Employed Fulltime in the Control Group = 8</p> <p>Expected Percentage of Control Work-Able Households <u>Employed Fulltime</u> After Implementation of the Activity</p> <p align="center">23.7%</p> <p align="center">employed fulltime</p>	<p>Actual number of work-able (19-61) households in the Control Group = 43</p> <p>Actual number of work-able (19-61) households Employed Fulltime in the Control Group = 9</p> <p>Actual Percentage of Control Work-Able Households <u>Employed Fulltime</u> After Implementation of the Activity</p> <p align="center">20.9%</p> <p align="center">employed fulltime</p>	No
(2) Employed Part- Time	<p>Number of work-able (19-61) households in the Control Group = 946</p> <p>Number of work-able (19-61) households Employed Part Time in the Control Group = 256</p> <p>Percentage of Control Work-Able Households <u>Employed Part Time</u> Prior to Implementation of the Activity</p> <p align="center">27.1%</p> <p align="center">employed part time</p>	<p>Expected number of work-able (19-61) households in the Control Group = 32</p> <p>Expected number of work-able (19-61) households Employed Part Time in the Control Group = 9</p> <p>Expected Percentage of Control Work-Able Households <u>Employed Part Time</u> After Implementation of the Activity</p> <p align="center">27.1%</p> <p align="center">employed part time</p>	<p>Actual number of work-able (19-61) households in the Control Group = 43</p> <p>Actual number of work-able (19-61) households Employed Part Time in the Control Group = 7</p> <p>Actual Percentage of Control Work-Able Households <u>Employed Part Time</u> After Implementation of the Activity</p> <p align="center">16.3%</p> <p align="center">employed part time</p>	No
(5) Unemployed	<p>Number of work-able (19-61) households in the Control Group = 946</p> <p>Number of work-able (19-61) households Unemployed in the Control Group = 372</p> <p>Percentage of Control Work-Able Households <u>Unemployed</u> Prior to Implementation of the Activity</p> <p align="center">39.3%</p> <p align="center">unemployed</p>	<p>Expected number of work-able (19-61) households in the Control Group = 32</p> <p>Expected number of work-able (19-61) households Unemployed in the Control Group = 13</p> <p>Expected Percentage of Control Work-Able Households <u>Unemployed</u> After Implementation of the Activity</p> <p align="center">39.3%</p> <p align="center">unemployed</p>	<p>Actual number of work-able (19-61) households in the Control Group = 43</p> <p>Actual number of work-able (19-61) households Unemployed in the Control Group = 26</p> <p>Actual Percentage of Control Work-Able Households <u>Unemployed</u> After Implementation of the Activity</p> <p align="center">39.5%</p> <p align="center">unemployed</p>	No

SS #4: Households Removed from Temporary Assistance for Needy Families (TANF)

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households receiving TANF assistance (decrease).	Households receiving TANF prior to implementation of the activity (number)	Expected number of households receiving TANF after implementation of the activity (number).	Actual households receiving TANF after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
Number of community-wide households receiving TANF assistance (decrease).	Number of Households in the Community-Wide Group Receiving TANF Prior to Implementation of the Activity 1 community-wide HOHs receiving TANF	Expected Number of Households in the Community-Wide Group Receiving TANF After Implementation of the Activity 2 community-wide HOHs receiving TANF	Actual Number of Households in the Community-Wide Group Receiving TANF After Implementation of the Activity 1 community-wide HOHs receiving TANF	Exceeds Benchmark
Number of restricted households receiving TANF assistance (decrease).	Number of Households in the Restricted Group Receiving TANF Prior to Implementation of the Activity 0 restricted voucher HOHs receiving TANF	Expected Number of Households in the Restricted Group Receiving TANF After Implementation of the Activity 2 restricted voucher HOHs receiving TANF	Actual Number of Households in the Restricted Group Receiving TANF After Implementation of the Activity 0 restricted voucher HOHs receiving TANF	Exceeds Benchmark
Number of control group households receiving TANF assistance (decrease).	Number of Households in the Control Group Receiving TANF Prior to Implementation of the Activity 0 control group HOHs receiving TANF	Expected Number of Households in the Control Group Receiving TANF After Implementation of the Activity 2 control group HOHs receiving TANF	Actual Number of Households in the Control Group Receiving TANF After Implementation of the Activity 0 control group HOHs receiving TANF	Exceeds Benchmark

SS #6: Reducing Per Unit Subsidy Costs for Participating Households

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average amount of Section 8 and/or 9 subsidy per household affected by this policy in dollars (decrease).	Average subsidy per household affected by this policy prior to implementation of the activity (in dollars).	Expected average subsidy per household affected by this policy after implementation of the activity (in dollars).	Actual average subsidy per household affected by this policy after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
Average amount of Section 8 subsidy per community wide household affected by this policy in dollars (decrease).	Housing Choice Voucher subsidy = \$8,762,268 Number of Housing Choice Units = 18,664 Number of Community-Wide vouchers at 120% of the Fair Market Rent = 40 Average Subsidy per Community-Wide Household Prior to Implementation of the Activity \$ 469.47 section 8 subsidy for community-wide group	Expected Housing Choice Voucher subsidy = \$13,143,402 Expected Number of Housing Choice Units = 27,996 Expected Number of Community-Wide vouchers at 120% of the Fair Market Rent = 40 Expected Average Subsidy per Community-Wide Household After Implementation of the Activity \$ 469.47 section 8 subsidy for community-wide group	Actual Housing Choice Voucher subsidy = \$14,613,338 Actual number of Housing Choice Units = 32,424 Actual number of Community-Wide vouchers at 120% of the Fair Market Rent = 40 Actual Average Subsidy per Community-Wide Household After Implementation of the Activity \$ 450.70 section 8 subsidy for community-wide group	Exceeds Benchmark
Average amount of Section 8 subsidy per restricted household affected by this policy in dollars (decrease).	Housing Choice Voucher subsidy = \$8,762,268 Number of Housing Choice Units = 18,664 Number of Restricted vouchers at 120% of the Fair Market Rent = 40 Average Subsidy per Restricted Household Prior to Implementation of the Activity \$ 469.47 section 8 subsidy for restricted voucher group	Expected Housing Choice Voucher subsidy = \$13,143,402 Expected Number of Housing Choice Units = 27,996 Expected Number of Restricted vouchers at 120% of the Fair Market Rent = 40 Expected Average Subsidy per Restricted Household After Implementation of the Activity \$ 469.47 section 8 subsidy for restricted voucher group	Actual Housing Choice Voucher subsidy = \$14,613,338 Actual number of Housing Choice Units = 32,424 Actual number of Restricted vouchers at 120% of the Fair Market Rent = 39 Actual Average Subsidy per Restricted Household After Implementation of the Activity \$ 462.25 section 8 subsidy for restricted voucher group	Exceeds Benchmark

SS #6: Reducing Per Unit Subsidy Costs for Participating Households - continued

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average amount of Section 8 subsidy per control group household affected by this policy in dollars (decrease).	Housing Choice Voucher subsidy = \$8,762,268	Expected Housing Choice Voucher subsidy = \$13,143,402	Actual Housing Choice Voucher subsidy = \$14,613,338	Exceeds Benchmark
	Number of Housing Choice Units = 18,664	Expected Number of Housing Choice Units = 27,996	Actual number of Housing Choice Units = 32,424	
	Number of Control vouchers at 120% of the Fair Market Rent = 40	Expected Number of Control vouchers at 120% of the Fair Market Rent = 40	Actual number of Control vouchers at 120% of the Fair Market Rent = 39	
	Average Subsidy per Control Household Prior to Implementation of the Activity	Expected Average Subsidy per Control Household After Implementation of the Activity	Actual Average Subsidy per Control Household After Implementation of the Activity	
	\$ 469.47	\$ 469.47	\$ 462.25	
	section 8 subsidy for control group	section 8 subsidy for control group	section 8 subsidy for control group	

SS #8: Households Transitioned to Self Sufficiency

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households transitioned to self sufficiency (increase). The PHA may create one or more definitions for "self sufficiency" to use for this metric. Each time the PHA uses this metric, the "Outcome" number should also be provided in Section (II) Operating Information in the space provided.	Households transitioned to self sufficiency (<<PHA definition of self-sufficiency>>) prior to implementation of the activity (number). This number may be zero.	Expected households transitioned to self sufficiency (<<PHA definition of self-sufficiency>>) after implementation of the activity (number).	Actual households transitioned to self sufficiency (<<PHA definition of self-sufficiency>>) after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
Number of community-wide households transitioned to self sufficiency (increase).	Households Transitioned to Self-Sufficiency (<u>Maintain Stable Housing for 12+ Consecutive Months</u>) Prior to Implementation of the Activity	Expected Households Transitioned to Self-Sufficiency (<u>Maintain Stable Housing for 12+ Consecutive Months</u>) After Implementation of the Activity	Actual Households Transitioned to Self-Sufficiency (<u>Maintain Stable Housing for 12+ Consecutive Months</u>) After Implementation of the Activity	Exceeds Benchmark
	0	10	36	
	self-sufficient community-wide households	self-sufficient community-wide households	self-sufficient community-wide households	

<i>SS #8: Households Transitioned to Self Sufficiency - continued</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of restricted households transitioned to self sufficiency (increase).	Households Transitioned to Self-Sufficiency (<u><i>Maintain Stable Housing for 12+ Consecutive Months</i></u>) Prior to Implementation of the Activity 0 self-sufficient restricted households	Expected Households Transitioned to Self-Sufficiency (<u><i>Maintain Stable Housing for 12+ Consecutive Months</i></u>) After Implementation of the Activity 10 self-sufficient restricted households	Actual Households Transitioned to Self-Sufficiency (<u><i>Maintain Stable Housing for 12+ Consecutive Months</i></u>) After Implementation of the Activity 17 self-sufficient restricted households	Exceeds Benchmark
Number of control households transitioned to self sufficiency (increase).	Households Transitioned to Self-Sufficiency (<u><i>Maintain Stable Housing for 12+ Consecutive Months</i></u>) Prior to Implementation of the Activity 0 self-sufficient restricted households	Expected Households Transitioned to Self-Sufficiency (<u><i>Maintain Stable Housing for 12+ Consecutive Months</i></u>) After Implementation of the Activity 10 self-sufficient restricted households	Actual Households Transitioned to Self-Sufficiency (<u><i>Maintain Stable Housing for 12+ Consecutive Months</i></u>) After Implementation of the Activity 4 self-sufficient restricted households	No

The approval year, FYE2015, was used to set “soft” baselines and corresponding benchmarks for the activity since the activity approval took place one-third into the fiscal year. FYE2016 was used to fully implement the activity and set the baselines and realistic, achievable benchmarks for this activity for the remainder of the activity’s demonstration period.

Regarding unachieved anticipated metrics, HACG attributes shortfalls in these areas to the local economy and voucher attrition. Columbus’ unemployment rate (5.1%)⁷ was higher during the reporting period than the City of Augusta-Richmond County (4.6%)⁷, a comparable sized city and government set up, than the City of Atlanta (4.1%)⁷, the State Capitol, and the State of Georgia’s unemployment rate (4.4%)⁷. Voucher attrition shortfalls are attributed to HACG’s intentional non-replacement of voluntary families in any evaluation group under this activity. Therefore, some metrics did not meet the established benchmark.

Because this activity is nearing the end of its evaluation period and other variables, HACG does not have any plans to adjust the activity. Meanwhile, the activity is on schedule and the annual benchmarks are listed on the next pages:

⁷Source: GA Department of Labor (GA DOL) Area Unemployment Rate and Labor Force Estimates

Annual Benchmark						
Unit of Measurement	Soft Baseline FYE 2015	Actual Baseline FYE 2016	FYE 2017	FYE 2018	FYE 2019	FYE 2020
Average earned income of community-wide households in dollars (increase).	\$ 9,518	\$ 10,058	\$ 10,560	\$ 11,088	\$ 11,643	\$ 12,225
Average earned income of location restricted households in dollars (increase).	\$ 9,518	\$ 10,058	\$ 10,560	\$ 11,088	\$ 11,643	\$ 12,225
Average earned income of control group households in dollars (increase).	\$ 9,518	\$ 10,058	\$ 10,560	\$ 11,088	\$ 11,643	\$ 12,225
Percentage of total community-wide workable households Employed Fulltime prior to implementation of activity	36.9%	23.7%	23.7%	23.8%	23.8%	24.1%
Percentage of total community-wide workable households Employed Part Time prior to implementation of activity	55.4%	27.1%	27.2%	27.4%	27.6%	27.9%
Percentage of total community-wide workable households Unemployed prior to implementation of activity	7.7%	39.3%	38.3%	40.2%	39.0%	39.0%
Percentage of total location restricted workable households Employed Fulltime prior to implementation of activity	36.9%	23.7%	23.2%	23.3%	23.3%	23.6%
Percentage of total location restricted workable households Employed Part Time prior to implementation of activity	55.4%	27.1%	25.7%	25.8%	26.0%	26.3%
Percentage of total location restricted workable households Unemployed prior to implementation of activity	7.7%	39.3%	41.3%	43.3%	42.0%	42.0%

Annual Benchmark - continued						
Unit of Measurement	Soft Baseline FYE 2015	Actual Baseline FYE 2016	FYE 2017	FYE 2018	FYE 2019	FYE 2020
Percentage of total control group work-able households Employed Fulltime prior to implementation of activity	36.9%	23.7%	23.2%	23.2%	23.7%	23.7%
Percentage of total control group work-able households Employed Part Time prior to implementation of activity	55.4%	27.1%	27.1%	27.3%	27.1%	27.1%
Percentage of total control group work-able households Unemployed prior to implementation of activity	7.7%	39.3%	40.5%	41.1%	41.7%	41.7%
Number of community-wide households receiving TANF assistance (decrease).	1.18	2.00	1.59	1.56	1.51	1.43
Number of location restricted households receiving TANF assistance (decrease).	1.18	2.00	0.79	0.78	0.76	0.72
Number of control group households receiving TANF assistance (decrease).	1.18	2.00	1.59	1.56	1.51	1.43
Average amount of Section 8 subsidy per community wide household affected by this policy in dollars (decrease).	\$ 544	\$ 469	\$ 507	\$ 507	\$ 507	\$ 497
Average amount of Section 8 subsidy per location restricted household affected by this policy in dollars (decrease).	\$ 544	\$ 469	\$ 507	\$ 507	\$ 507	\$ 497
Average amount of Section 8 subsidy per control group household affected by this policy in dollars (decrease).	\$ 544	\$ 469	\$ 507	\$ 507	\$ 507	\$ 497

Annual Benchmark - continued						
Unit of Measurement	Soft Baseline FYE 2015	Actual Baseline FYE 2016	FYE 2017	FYE 2018	FYE 2019	FYE 2020
Number of community-wide households transitioned to self sufficiency (increase).	8	10	22	24	26	29
Number of location restricted households transitioned to self sufficiency (increase).	3	10	31	34	37	41
Number of control group households transitioned to self sufficiency (increase).	8	10	23	25	27	30

HACG moved from Emphasys as its client tracking software to YARDI during FYE2016. HACG staff is still learning the full capabilities of YARDI. HACG staff continues to manually collect data from both systems to provide as accurate a picture as possible for Planning and Reporting purposes.

Activity **2014.02 – Innovations to Reduce Homelessness** was introduced and **approved in HACG’s FYE2014 Annual MTW Plan** and implemented during the same fiscal year as approval.

The activity uses MTW Authorizations D.2.a, D.2.b, and D.4 listed in Attachment C of the MTW Agreement to implement any reasonable policy to calculate the tenant portion of the rent, determine content of contract rental agreements, and determine the wait list procedures, tenant selection procedures, and criteria and preferences that differ from the currently mandated program requirements for up to 150 vouchers to assist properly referred, chronically homeless, eligible families with concerted case management stabilization efforts.

The activity models the *Housing First* approach to quickly connect chronically homeless individuals and families to permanent housing while seeking to learn if the “rapid” housing concept reduces the homeless population in the area and if the voucher issuance assists in the stabilization of homeless individuals and/or families. The activity works cooperatively with Home for Good, the area’s Continuum of Care Committee, service providers, and other homeless prevention organizations as well.

Since the activity’s approval, HACG has earmarked vouchers each fiscal year for this endeavor. The fiscal year breakdown is tabled below:

Fiscal Year	Vouchers Reserved	Rolling Voucher Count
FYE2014	30	30
FYE2015	50	80
FYE2016	40	120
FYE2017	30	150

Based on feedback shared with HACG, the positive impacts of the activity include an overwhelming “open-armed” reception by the homeless prevention community, city officials, individual/family participants, and local and state service providers alike, as well as agency-flattering requests from industry peers and homeless prevention advocates to share details of the activity to potentially incorporate into their model.

HACG is pleased with the feedback and continues to successfully address challenges presented by the activity’s loopholes and the targeted population. HACG continues to strengthen the centralization of referrals process with local conduit Home for Good (HfG). Established under United Way, HfG manages referrals and the Wait List and conducts pre-eligibility screenings to ensure homeless individuals and families have the required documentation and materials to expedite the interview and placement process for housing, as well as assessment process for case management.

The table below chronicles the internal impact of the activity:

Category	Count	% of Activity
Committed Vouchers (Family Housed)	126	91%
Obligated Vouchers (Family Searching)	10	7%
Individual Family (1 person)	64	46%
Families (2+ persons)	74	54%
Veterans	23	17%

This activity does not meet the definition of rent reform.

HUD Standard Metrics for HACG's Community Choice MTW Activity:

SS #1: Increase in Household Income				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average earned income of households affected by this policy in dollars (increase).	Average earned income of households affected by this policy prior to implementation of the activity (in dollars).	Expected average earned income of households affected by this policy prior to implementation of the activity (in dollars).	Actual average earned income of households affected by this policy prior to implementation (in dollars).	Whether the outcome meets or exceeds the benchmark.
Average earned income of households affected by this policy in dollars (increase).	Monthly earned income of households affected by this policy = \$87,236 Number of households affected by this policy = 28 Average Monthly Earned Income of Households Affected by this Policy Prior to Implementation of the Activity \$ 3,115.57 average earned income	Expected monthly earned income of households affected by this policy = \$603,200 Expected number of households affected by this policy = 80 Expected Average Monthly Earned Income of Households Affected by this Policy After Implementation of the Activity \$ 7,540.00 average earned income	Actual monthly earned income of households affected by this policy = \$501,253 Actual number of households affected by this policy = 138 Actual Average Monthly Earned Income of Households Affected by this Policy After Implementation of the Activity \$ 3,632.27 average earned income	No

SS #3: Increase in Positive Outcomes in Employment Status				
<i>Report the Baseline, Benchmark and Outcome data for each type of employment status for those head(s) of households affected by the self-sufficiency activity.</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Report the following information separately for each category:				
(1) Employed Full- Time	Head(s) of households in <<category name>> prior to implementation of the activity (number). This number may be zero.	Expected head(s) of households in <<category name>> after implementation of the activity (number).	Actual head(s) of households in <<category name>> after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
(2) Employed Part- Time				
(3) Enrolled in an Educational Program				
(4) Enrolled in Job Training Program				
(5) Unemployed				
(6) Other				
	Percentage of total work-able households in <<category name>> prior to implementation of activity (percent). This number may be zero.	Expected percentage of total work-able households in <<category name>> after implementation of the activity (percent).	Actual percentage of total work-able households in <<category name>> after implementation of the activity (percent).	Whether the outcome meets or exceeds the benchmark.

SS #3: Increase in Positive Outcomes in Employment Status

Report the Baseline, Benchmark and Outcome data for each type of employment status for those head(s) of households affected by the self-sufficiency activity.

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
(1) Employed Full- Time	Number of work-able (19-61) households = 17 Number of work-able (19-61) households employed fulltime = 1 Percentage of Work-Able (19-61) Households <u>Employed Fulltime</u> Prior to Implementation of the Activity 5.9% employed fulltime	Expected number of work-able (19-61) households = 45 Expected number of work-able (19-61) households employed fulltime = 3 Expected Percentage of Work-Able (19-61) Households <u>Employed Fulltime</u> After Implementation of the Activity 5.9% employed fulltime	Actual number of work-able (19-61) households = 108 Actual number of work-able (19-61) households employed fulltime = 13 Actual Percentage of Work-Able (19-61) Households <u>Employed Fulltime</u> After Implementation of the Activity 12.0% employed fulltime	Exceeds Benchmark
(2) Employed Part- Time	Number of work-able (19-61) households = 17 Number of work-able (19-61) households = 9 Percentage of Work-Able (19-61) Households <u>Employed Part Time</u> Prior to Implementation of the Activity 52.9% employed part time	Expected number of work-able (19-61) households = 45 Expected number of work-able (19-61) households = 24 Expected Percentage of Work-Able (19-61) Households <u>Employed Part Time</u> After Implementation of the Activity 52.9% employed part time	Actual number of work-able (19-61) households = 108 Actual number of work-able (19-61) households = 27 Actual Percentage of Work-Able (19-61) Households <u>Employed Part Time</u> After Implementation of the Activity 25.0% employed part time	No
(3) Unemployed	Number of work-able (19-61) households = 17 Number of work-able (19-61) households = 8 Percentage of Work-Able (19-61) Households <u>Unemployed</u> Prior to Implementation of the Activity 47.1% unemployed	Expected number of work-able (19-61) households = 45 Expected number of work-able (19-61) households = 21 Expected Percentage of Work-Able (19-61) Households <u>Unemployed</u> After Implementation of the Activity 47.1% unemployed	Actual number of work-able (19-61) households = 108 Actual number of work-able (19-61) households = 68 Actual Percentage of Work-Able (19-61) Households <u>Unemployed</u> After Implementation of the Activity 63.0% unemployed	No

SS #4: Households Removed from Temporary Assistance for Needy Families (TANF)

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households receiving TANF assistance (decrease).	Households receiving TANF prior to implementation of the activity (number)	Expected number of households receiving TANF after implementation of the activity (number).	Actual households receiving TANF after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
Number of households receiving TANF assistance (decrease).	<p>Households Receiving TANF Prior to Implementation of the activity</p> <p align="center">0</p> <p align="center">households receiving TANF</p>	<p>Expected Households Receiving TANF After Implementation of the activity</p> <p align="center">8</p> <p align="center">households receiving TANF</p>	<p>Actual Households Receiving TANF After Implementation of the activity</p> <p align="center">4</p> <p align="center">households receiving TANF</p>	Exceeds Benchmark

This activity, approved by HUD on July 31, 2013 and implemented during FYE2014, is on schedule. HACG used the initial implementation year to collect data since HACG did not collect this data prior to approval of this activity. Benchmarks were revised based on collected data to reflect realistic, achievable outcomes of the targeted population for the remainder of the demonstration.

Regarding unachieved anticipated metrics, HACG attributes shortfalls in these areas to the local economy. Columbus' unemployment rate (5.1%)⁸ was higher during the reporting period than the City of Augusta-Richmond County (4.6%)⁸, a comparable sized city and government set up, than the City of Atlanta (4.1%)⁸, the State Capitol, and the State of Georgia's unemployment rate (4.4%)⁸.

HACG plans to adjust the activity during FYE2018 by redefining/reminding activity partners of their commitment to provide case management to rapidly housed families, while actively enforcing penalties against non-compliant voucher-holding families.

The annual benchmarks are listed below:

⁸Source: GA Department of Labor (GA DOL) Area Unemployment Rate and Labor Force Estimates

Annual Benchmark						
Unit of Measurement	Baseline FY 2014	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019
Average earned income of households affected by this policy in dollars (increase)	\$ 3,115.57	\$ 7,540.00	\$ 3,770.00	\$ 7,540.00	\$ 9,425.00	\$ 11,310.00
Percentage of total workable households Employed Fulltime prior to implementation of activity (percent). This number may be zero.	5.9%	5.9%	5.9%	6.5%	7.1%	7.8%
Percentage of total workable households Employed Part Time prior to implementation of activity (percent). This number may be zero.	52.9%	52.9%	52.9%	55.4%	56.7%	57.9%
Percentage of total workable households Unemployed prior to implementation of activity (percent). This number may be zero.	47.1%	47.1%	47.1%	45.4%	43.8%	42.1%
Number of households receiving TANF assistance (decrease).	0	8	12	9	6	3
Number of households transitioned to self-sufficiency.	0	111	114	117	117	117

HACG moved from Emphasys as its client tracking software to YARDI during FYE2016. HACG staff is still learning the full capabilities of YARDI. HACG staff continues to manually collect data from both systems to provide as accurate a picture as possible for Planning and Reporting purposes.

Activity **2014.03 – Administrative Reform** was introduced and **approved in HACG’s FYE2014 Annual MTW Plan** and fully implemented in the same fiscal period as approval.

This activity used MTW Authorizations under both Public Housing (PH) and Housing Choice Voucher (HCV) elements listed in Attachment C of the MTW Agreement to provide administrative reforms to both rental assistance programs administered by HACG.

- PH MTW Authorizations C.2, C.4, and C.11 **were** used to develop and adopt local preferences and admission policies and procedures to restructure the frequency of reviews and the methods and processes used to establish the integrity of income information provided, to determine the family payment and set rents in public housing, including definitions of income and adjusted income that differ from those

- in current statutes and regulations. However, the use of LIHTC funding requires an annual review and HACG elected to discontinue using the PH MTW Authorizations as it continues to convert its units with the use of LIHTC funding.
- HCV MTW Authorizations D.2.b, D.3.a, and D.3.b **are** used to adopt and implement a reexamination program that differs, to adopt and implement any reasonable policy to establish payment standards, rents, or subsidy agreements that differ, to determine income qualifications for participation in the rental assistance program that differ, and to adopt and implement any reasonable policy for verifying family income and composition and for determining resident eligibility that differ from the currently mandated program requirements respectively.

The activity **sets an asset limitation** for existing residents and new admissions for either program, where income derived from assets below \$50,000 are excluded from the income calculation. Conversely, income received from assets equal to and above \$50,000 are included into the income calculation. The implementation year of the program was used to set the baseline that included existing residents and new admissions prior to June 30. Thereafter residents **self-certify** their asset amount **annually**. Assets are **randomly verified** by HCV Occupancy Specialists (case workers).

The activity also eliminates the 40% income cap in the HCV Program. The elimination of this cap allows residents to use up to 50% of their income towards rent, which increases housing choices for residents, while setting a 50% rent burden cap. Under no circumstances will residents be allowed to use more than 50% of their income toward rent. Case workers monitor this cap during initial, annual, and interim examinations.

As of June 30, 2017, positive impacts of the activity include “faster” interviews since most residents in the HCV Program have not accumulated more than \$50,000 in assets. Residents that have accumulated \$50,000 or more in assets have the income derived off such assets included in their income calculation and their rent share.

Overall, HACG is pleased with the feedback provided by staff and residents alike.

This activity does not meet the definition of rent reform.

HUD Standard Metrics for HACG’s Community Choice MTW Activity:

CE #1: Agency Cost Savings - Administrative Reform				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	Cost of task prior to implementation of the activity (in dollars).	Expected cost of task after implementation of the activity (in dollars).	Actual cost of task after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
	Average hourly compensation (salary & benefits) of Housing Managers = \$29.13; of Occupancy Specialists = \$24.50	Expected average hourly compensation (salary & benefits) of Housing Managers = \$30.90; of Occupancy Specialists = \$26.00	Actual average hourly compensation (salary & benefits) of Housing Managers = \$30.00; of Occupancy Specialists = \$25.24	Exceeds Benchmark
	Average time to complete PH annual/interim exam = 1.83 hrs; HCV annual/interim exam = 2.00 hrs	Expected average time to complete PH annual/interim exam = 1.83 hrs; HCV annual/interim exam = 2.00 hrs	Actual average time to complete PH annual/interim exam = 1.42 hrs; HCV annual/interim exam = .70 hrs	
Total cost of task in dollars (decrease).	Number of PH annual exams = 1,688; of HCV annual exams = 2,333	Expected number of PH annual exams = 1,417; of HCV annual exams = 2,974	Actual number of PH annual exams = 1,093; of HCV annual exams = 2,558	
	Cost of to Conduct Annual/Interim Recertification Examinations Prior to Implementation of the Activity	Expected Cost of to Conduct Annual/Interim Recertification Examinations After Implementation of the Activity	Actual Cost of to Conduct Annual/Interim Recertification Examinations After Implementations of the Activity	
	\$ 102,150.37	\$ 102,490.39	\$ 45,878.27	
	agency cost	agency cost	agency cost	

CE #2: Staff Time Savings - Administrative Reform				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	Total amount of staff time dedicated to the task prior to implementation of the activity (in hours).	Expected amount of total staff time dedicated to the task after implementation of the activity (in hours).	Actual amount of total staff time dedicated to the task after implementation of the activity (in hours).	Whether the outcome meets or exceeds the benchmark.
Total time to complete the task in staff hours (decrease).	Amount of staff time dedicated to PH recertifications = 1.83 hrs; to HCV recertifications = 2.00 hrs Number of annual PH recertifications = 1,688; of annual HCV recertifications = 2,333 Total Amount of Staff Hours Dedicated to Recertifications 3,877.5 staff hours	Expected amount of staff time dedicated to PH recertifications = 1.83 hrs; to HCV recertifications = 2.00 hrs Expected number of annual PH recertifications = 1,516; of annual HCV recertifications = 2,534 Expected Total Amount of Staff Hours Dedicated to Recertifications 3,921.1 staff hours	Actual amount of staff time dedicated to PH recertifications = 1.42 hrs; to HCV recertifications = .70 hrs Actual number of annual PH recertifications = 1,093; of annual HCV recertifications = 2,558 Actual Total Amount of Staff Hours Dedicated to Recertifications 1,671.3 staff hours	Exceeds Benchmark

CE #3: Decrease in Error Rate of Task Execution - Administrative Reform				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average error rate in completing a task as a percentage (decrease).	Average error rate of task prior to implementation of the activity (percentage).	Expected average error rate of task after implementation of the activity (percentage).	Actual average error rate of task after implementation of the activity (percentage).	Whether the outcome meets or exceeds the benchmark.
Average error rate in completing a task as a percentage (decrease).	Number of PH Quality Control checks = 35; of HCV QC checks = 38 Number of PH errors noted = 25; of HCV errors noted = 5 Average Error Rate of Quality Control Checks 42.3% average error rate	Expected number of PH Quality Control checks = 34; of HCV QC checks = 47 Expected number of PH errors noted = 20; of HCV errors noted = 7 Expected Average Error Rate of Quality Control Checks 36.9% average error rate	Actual number of PH Quality Control checks = 0; of HCV QC checks = 30 Actual number of PH errors noted = 0; of HCV errors noted = 5 Actual Average Error Rate of Quality Control Checks 16.7% average error rate	Exceeds Benchmark

Note: PH Quality Controls (QCs) reflect zeros in the chart above primarily due to limited resources and time. HACG spent FYE2017 on various conversion challenges with RAD I Projects (583 units) as well as planning and pre-construction challenges with RAD II Projects (592 units). Nonetheless, HACG remains committed to converting its entire PH portfolio, as awarded, to PBV units. However, thinly stretched resources coupled with learning multiple-layered compliance requirements for two new programs, RAD and LIHTC, prevented the performance of QCs for PH units.

CE #5: Increase in Tenant Rent Share - Administrative Reform				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Tenant rental revenue in dollars (increase).	Tenant rental revenue prior to implementation of the activity (in dollars).	Expected tenant rental revenue after implementation of the activity (in dollars).	Actual tenant rental revenue after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
Tenant rental revenue in dollars (increase).	Tenant rental revenue for Public Housing = \$2,207,333; Housing Choice Voucher = \$314,834 Number of Public Housing units = 17,939; Housing Choice Voucher units = 2,099 Tenant Rental Revenue Prior to Activity Implementation \$ 136.52 average tenant rent (PH and S8)	Expected tenant rental revenue for Public Housing = \$2,207,333; Housing Choice Voucher = \$314,834 Expected number of Public Housing units = 17,939; Housing Choice Voucher units = 2,099 Expected Tenant Rental Revenue After Activity Implementation \$ 136.52 average tenant rent (PH and S8)	Tenant rental revenue for Public Housing = \$1,524,831; Housing Choice Voucher = \$312,031 Number of Public Housing units = 10,820; Housing Choice Voucher units = 2,553 Actual Tenant Rental Revenue After Activity Implementation \$ 131.57 average tenant rent (PH and S8)	Benchmark Not Achieved

HC #5: Increase in Resident Mobility - Administrative Reform				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
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.
Number of households able to move to a better unit and/or neighborhood of opportunity as a result of the activity (increase).	Number of Section 8 vouchers = 2,333 Percentage of Section 8 families exceeding the 40% Income Cap = 0.0% Number of Households Able to Move to a Better Unit and/or Neighborhood of Opportunity Prior to Activity Implementation 0 families able to move with fewer limitations	Expected number of Section 8 vouchers = 2,333 Expected percentage of Section 8 families exceeding the 40% Income Cap = 15% Expected Number of Households Able to Move to a Better Unit and/or Neighborhood of Opportunity After Activity Implementation 350 families able to move with fewer limitations	Actual number of Section 8 vouchers = 2,553 Actual percentage of Section 8 families exceeding the 40% Income Cap = 11.4% Actual Number of Households Able to Move to a Better Unit and/or Neighborhood of Opportunity After Activity Implementation 291 families able to move with fewer limitations	Benchmark Not Achieved

The approval year, FYE2014, was used to set the baseline and corresponding benchmarks for the activity. FYE2015 was used to fully implement the activity and adjust the baselines to reflect realistic, achievable benchmarks for this activity for the remainder of the demonstration period.

Regarding unachieved anticipated metrics, HACG attributes shortfalls in these areas to resident choice. Overall, people are creatures of habit, which include living, working, and playing in areas of familiarity. In some instances, these places include lower rent, higher poverty, and less opportunity by some definitions. Because resident choice contributes significantly to unachieved anticipated metrics, HACG does not plan to adjust the activity. Meanwhile, the activity is on schedule and the annual benchmarks are listed below:

Annual Benchmark						
Unit of Measurement	Baseline FY 2014	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019
Total cost of task in dollars (decrease).	\$ 102,150.37	\$ 102,490.39	\$ 105,565.10	\$ 108,732.05	\$ 111,994.01	\$ 115,353.83
Total time to complete the task in staff hours (decrease).	3877.5	3921.1	4038.8	4159.9	4284.7	4413.3
Average error rate in completing a task as a percentage (decrease).	42.3%	36.9%	38.0%	39.1%	40.3%	41.5%
Tenant rental revenue in dollars (increase).	\$ 136.52	\$ 136.52	\$ 140.62	\$ 144.83	\$ 149.18	\$ 153.65
Number of households able to move to a better unit and/or neighborhood of opportunity as a result of the activity (increase).	0	350	360	371	382	394

HACG moved from Emphasys as its client tracking software to YARDI during FYE2016. HACG staff is still learning the full capabilities of YARDI. HACG staff continues to manually collect data from both systems to provide as accurate a picture as possible for Planning and Reporting purposes.

Activity **2014.04 – Administrative Efficiencies** was introduced and **approved in HACG’s FY2014 Annual MTW Plan** and implemented during the same fiscal year as approval.

The activity uses MTW Authorization D.1.c listed in Attachment C of the MTW Agreement to perform recertification examinations on HACG’s HCV elderly and/or disabled residents on a triennial basis by restructuring the initial, annual, and interim review process in the public housing program in order to affect the frequency of the reviews and adopt a local system of income verification in lieu of the current HUD system and by defining, adopting, and implementing a HCV reexamination program that differs from the reexamination program currently mandated in the 1937 Act and its implementing regulations.

The activity is designed to promote efficiency within the reexamination process by placing qualified households on an every 3-year reexamination, review cycle.

Households must meet the following parameters of the activity:

A: ELIGIBILITY

Household Party	Definition	Comments
Head-of-Household (HoH)	Elderly	<i>Must</i> be 62 or older <i>prior to</i> annual certification review
HoH	Disabled	Must <i>meet</i> disability <i>definition</i> and <i>receive compensation</i> for such
HoH	Elderly and Disabled	<i>Must</i> be 62 or older AND <i>meet</i> disability <i>definition</i> AND <i>receive compensation</i> for such

Elderly and/or Disabled = Elderly/Disabled

B: INCOME

Category	Comments
Income	<i>Must</i> be from <i>fixed, stable</i> income sources
Income Source(s)	Income Examples include: <ul style="list-style-type: none"> ✓ Pension ✓ Social Security (SS) ✓ SS Disability Insurance (SSDI) ✓ Veteran Affairs (VA) Benefits

Note: Social Security Insurance (SSI) is available to non-workers or workers with limited work credit, e.g., minors, therefore, HACG cautions its Housing Managers and Occupancy Specialists to verify SSI recipient before adding household to the 3-year review schedule.

Since fixed, stable sources of income are generally stagnant and increases (usually less than 5%) associated to these income types influence the annual income amount very little, HACG viewed annual reviews of residents meeting these parameters as inefficient and time-consuming to both residents and staff.

Households that include a fluctuating income source are returned to and remain on an annual recertification schedule regardless if the family HoH meets the activity's definition.

Scenario examples that nullify 3-year review schedule are listed below:

Category	Income Source	Comments
Elderly HoH	Eligible income AND/OR ✓ Child Support ✓ Employment ○ (FT, PT, etc.) ✓ Military Pay ○ (Active or Reserve) ✓ PHA Stipend ✓ Unemployment ✓ And/Or similar sources	Ineligible for Triennial Review Schedule
Disabled HoH	Eligible income AND/OR ✓ Child Support ✓ Employment ○ (FT, PT, etc.) ✓ Military Pay ○ (Active or Reserve) ✓ PHA Stipend ✓ Unemployment ✓ And/Or similar sources	Ineligible for Triennial Review Schedule
Elderly/Disabled HoH	Eligible income AND/OR ✓ Child Support ✓ Employment ○ (FT, PT, etc.) ✓ Military Pay ○ (Active or Reserve) ✓ PHA Stipend ✓ Unemployment ✓ And/Or similar sources	Ineligible for Triennial Review Schedule

Overall, HACG has received positive comments on this activity from both the residents and staff. Program participants that meet the definition have conveyed appreciative feedback primarily focusing on limited intrusion into their personal holdings and reduced visits with HACG, especially from those with mobility issues. Staff feedback seems to indicate that the activity frees up time to focus on complicated recertification examinations.

Impact of the activity includes a growing desire of other program participants expressing an interest in being placed on the every 3-year review schedule because their child receives SSI. However, these households include a HoH that is work-able and/or does not meet the age requirement.

This activity does not meet the definition of rent reform.

HUD Standard Metrics for HACG’s Administrative Efficiencies MTW Activity:

CE #1: Agency Cost Savings - Administrative Efficiency				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	Cost of task prior to implementation of the activity (in dollars).	Expected cost of task after implementation of the activity (in dollars).	Actual cost of task after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
	Average hourly compensation (salary & benefits) of Housing Managers = \$29.13; of Occupancy Specialists = \$25.75	Expected average hourly compensation (salary & benefits) of Housing Managers = \$29.13; of Occupancy Specialists = \$25.75	Actual average hourly compensation (salary & benefits) of Housing Managers = \$30.00; of Occupancy Specialists = \$26.52	
	Average time to complete PH annual/interim exam = .92 hrs; HCV annual/interim exam = .92 hrs	Expected time to complete PH annual/interim exam = .92 hrs; HCV annual/interim exam = .92 hrs	Actual time to complete PH annual/interim exam = .92 hrs; HCV annual/interim exam = .92 hrs	
Total cost of task in dollars (decrease).	Number of PH annual exams = 704; of HCV annual exams = 904	Expected number of PH annual exams = 235; of HCV annual exams = 301	Actual number of PH annual exams = 188; of HCV annual exams = 1107	Benchmark Not Achieved
	Total Cost of Recertification for Elderly/Disabled Families Prior to Implementation of the Activity	Expected Cost of Recertification for Elderly/Disabled Families After Implementation of the Activity	Actual Cost of Recertification for Elderly/Disabled Families After Implementation of the Activity	
	\$ 40,136.73	\$ 13,378.80	\$ 32,197.83	
	agency cost	agency cost	agency cost	

CE #2: Staff Time Savings - Administrative Efficiency				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	Total amount of staff time dedicated to the task prior to implementation of the activity (in hours).	Expected amount of total staff time dedicated to the task after implementation of the activity (in hours).	Actual amount of total staff time dedicated to the task after implementation of the activity (in hours).	Whether the outcome meets or exceeds the benchmark.
Total time to complete the task in staff hours (decrease).	Amount of staff time dedicated to PH recertifications = .92 hrs; to HCV recertifications = .92 hrs Number of annual PH recertifications = 704; of annual HCV recertifications = 904 Total Amount of Staff Hours Dedicated to Elderly/Disabled Family Recertifications Prior to Implementation of the Activity 739.7 average annual staff hours	Expected amount of staff time dedicated to PH recertifications = .92 hrs; to HCV recertifications = .92 hrs Expected number of annual PH recertifications = 235; of annual HCV recertifications = 301 Expected Amount of Staff Hours Dedicated to Elderly/Disabled Family Recertifications After Implementation of the Activity 246.6 average annual staff hours	Actual amount of staff time dedicated to PH recertifications = .92 hrs; to HCV recertifications = .92 hrs Actual number of annual PH recertifications = 188; of annual HCV recertifications = 1107 Actual Amount of Staff Hours Dedicated to Elderly/Disabled Family Recertifications After Implementation of the Activity 595.7 average annual staff hours	Benchmark Not Achieved

CE #5: Increase in Tenant Rent Share - Administrative Efficiency				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Tenant rental revenue in dollars (increase).	Tenant rental revenue prior to implementation of the activity (in dollars).	Expected tenant rental revenue after implementation of the activity (in dollars).	Actual tenant rental revenue after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
Tenant rental revenue in dollars (increase).	Tenant rental revenue for Public Housing = \$2,207,333; Housing Choice Voucher = \$314,834 Number of Public Housing units = 17,939; Housing Choice Voucher = 2,099 Tenant Rental Revenue Prior to Activity Implementation \$ 136.52 average tenant rent (PH and S8)	Expected tenant rental revenue for Public Housing = \$2,207,333; Housing Choice Voucher = \$314,834 Number of Public Housing units = 17,939; Housing Choice Voucher = 2,099 Expected Tenant Rental Revenue After Activity Implementation \$ 136.52 average tenant rent (PH and S8)	Tenant rental revenue for Public Housing = \$1,524,831; Housing Choice Voucher = \$370,856 Number of Public Housing units = 10,820; Housing Choice Voucher = 2,553 Actual Tenant Rental Revenue After Activity Implementation \$ 143.09 average tenant rent (PH and S8)	Exceeds Benchmark

The approval year, FYE2014, was used to set the baseline and corresponding benchmarks for the activity. FYE2015 was used to fully implement the activity and adjust benchmarks to realistic, achievable levels for the remainder of the demonstration period.

Since implementation, the activity includes modifications that exclude HACG’s PH units because HACG is approved for a full portfolio conversion of its PH units to PBV units under the RAD Program. HACG also elected to use LIHTC funds to meet certain RAD requirements and this decision, to use LIHTC funds, requires HACG to review LIHTC units annually. Therefore, the annual review requirement, in addition to others, negates the effective use of this activity for PH units. Consequently, HACG discontinues the use of MTW Authorization C.4 to review eligible households every 3-years.

Annual Benchmark						
Unit of Measurement	Baseline FY 2014	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019
Total cost of task in dollars (decrease).	\$ 40,136.73	\$ 13,378.80	\$ 13,780.16	\$ 14,193.57	\$ 14,619.37	\$ 15,057.95
Total time to complete the task in staff hours (decrease).	739.7	246.6	254.0	261.6	269.4	277.5
Tenant rental revenue in dollars (increase).	\$ 136.52	\$ 136.52	\$ 140.62	\$ 144.83	\$ 149.18	\$ 153.65

HACG moved from Emphasys as its client tracking software to YARDI during FYE2016. HACG staff is still learning the full capabilities of YARDI. HACG staff continues to manually collect data from both systems to provide as accurate a picture as possible for Planning and Reporting purposes.

Activity **2014.06 – Rent Reform (Farley)** was introduced and **approved in HACG’s FY2014 Annual MTW Plan** and implemented during the same fiscal year as approval.

The activity utilizes MTW Authorizations B.1.a, B.1.b, B.1.b.iii, C.4, C.11, and E listed in Attachment C of the MTW Agreement to provide a lower rent calculation percentage, to set a minimum rent different than the minimum rent at other subsidized properties in HACG’s portfolio, to offer incentives to residents that become employed and/or enrolled in an education program, including job training, as well as to continue operating its existing self-sufficiency programs at the site by combining funding awards into a single, authority-wide funding source, by using MTW funds for any eligible activity, by providing housing or employment related services, by restructuring the review process, by adopting and implementing any reasonable policies for setting rents, and by operating existing self-sufficiency and training programs that differ from the currently mandated program requirements in the 1937 Act.

The activity changes the effective date so that both properties are effective on January 1 and increases the minimum rent from \$50 per month to \$100 per month for the test site only. The activity provides a tiered rent schedule and financial incentives for qualified residents to learn if any or all influences reduce unemployed households.

The activity compares two demographically similar-sized properties in HACG’s portfolio. The demographics* of the two properties, before the activity, are contrasted below:

Category	E.E. Farley (Test Site)	Louis Chase (Comparison/Control Site)
Number of Units	102	108
Employed Residents	40	36
Average Annual Income – Employed	\$12,530	\$13,697
Average Rent – Employed	\$186	\$191
Number of Unemployed (Head-of-Household)	44	45

**Statistics, as of March 2013*

The tiered rent schedule applies to new admissions to and long-term unemployed families⁹ at Farley that return to the workforce during their tenancy. The tiered rent schedule is:

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

Tiered rent is a one-time opportunity. Should a family involuntarily or voluntarily terminate employment, their rent calculation returns to 30% once they return to work no matter where they were on the Tiered Rent Schedule.

Also, the activity offers, on a limited basis and as funding permits, financial incentives to long-term, unemployed residents originally identified prior to the implementation of this activity. Financial incentives, such as childcare, transportation, and work-related assistance, are limited by dollar amount and descend as time progresses and the family stabilizes.

Finally, the activity includes an increased presence of HACG’s Family Self-Sufficiency (FSS) Program at Farley and a “normal” presence at Chase. The increased presence of the FSS Program includes presenting workshops onsite that prepare residents for their return to the workforce.

All residents, Chase and Farley, are required to complete Columbus State University (CSU) surveys to measure results of the activity’s influences over the demonstration period.

Overall, HACG has not realized the fruits of the activity as originally hoped. However, as of June 30, 2017, HACG has not received any hardship requests related to the minimum rent

⁹ Qualified families identified were unemployed for 6-months or longer before the start of the activity

increase and unemployed residents have reported earned income at annual recertification examinations. The tiered rent schedule is not being implemented as originally planned due to the new software, from Emphasys to YARDI and the financial incentives appear to be rarely promoted based on discussions and reports. As of this report, no discussions nor reports have been revealed that suggests a lack of funding for these incentives.

This activity does meet the definition of rent reform.

HUD Standard Metrics for HACG’s Administrative Efficiencies MTW Activity:

<i>CE #5: Increase in Tenant Rent Share - Rent Reform (Farley)</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Tenant rental revenue in dollars (increase).	Tenant rental revenue prior to implementation of the activity (in dollars).	Expected tenant rental revenue after implementation of the activity (in dollars).	Actual tenant rental revenue after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
Farley tenant rental revenue in dollars (increase).	Amount of revenue collected = \$110,184; number of units = 1,212 Farley Rental Revenue Prior to Implementation of the Activity \$ 90.91 average monthly tenant rent at E.E. Farley Apartments	Expected amount of revenue collected = \$110,184; number of units = 1,212 Expected Farley Rental Revenue After Implementation of the Activity \$ 90.91 average monthly tenant rent at E.E. Farley Apartments	Actual amount of revenue collected = \$161,299; number of units = 917 Actual Farley Rental Revenue After Implementation of the Activity \$ 175.90 average monthly tenant rent at E.E. Farley Apartments	Exceeds Benchmark
Chase tenant rental revenue in dollars (increase).	Amount of revenue collected = \$119,471; number of units = 1,282 Chase Rental Revenue Prior to Implementation of the Activity \$ 93.19 average monthly tenant rent at Louis Chase Apartments	Expected amount of revenue collected = \$119,471; number of units = 1,282 Expected Chase Rental Revenue After Implementation of the Activity \$ 93.19 average monthly tenant rent at Louis Chase Apartments	Actual amount of revenue collected = \$140,330; number of units = 1,157 Actual Chase Rental Revenue After Implementation of the Activity \$ 121.29 average monthly tenant rent at Louis Chase Apartments	Exceeds Benchmark

SS #1: Increase in Household Income - Rent Reform (Farley)

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average earned income of households affected by this policy in dollars (increase).	Average earned income of households affected by this policy prior to implementation of the activity (in dollars).	Expected average earned income of households affected by this policy prior to implementation of the activity (in dollars).	Actual average earned income of households affected by this policy prior to implementation (in dollars).	Whether the outcome meets or exceeds the benchmark.
Average earned income of Farley households affected by this policy in dollars (increase).	Total earned income = \$501,200 Number of employed households = 40 Average Earned Income of Households Affected by this Policy Prior to Implementation of the Activity \$ 12,530.00 average earned income of E.E. Farley Households	Expected earned income = \$584,408 Expected number of employed households = 44 Expected Average Earned Income of Households Affected by this Policy After Implementation of the Activity \$ 13,282.00 average earned income of E.E. Farley Households	Actual earned income = \$851,140 Actual number of employed households = 54 Actual Average Earned Income of Households Affected by this Policy After Implementation of the Activity \$ 15,761.85 average earned income of E.E. Farley Households	Exceeds Benchmark
Average earned income of Chase households affected by this policy in dollars (increase).	Total earned income = \$493,092 Number of employed households = 36 Average Earned Income of Households Affected by this Policy Prior to Implementation of the Activity \$ 13,697.00 average earned income of Louis Chase Households	Expected earned income = \$493,092 Expected number of employed households = 36 Expected Average Earned Income of Households Affected by this Policy After Implementation of the Activity \$ 13,697.00 average earned income of Louis Chase Households	Actual earned income = \$798,746 Actual number of employed households = 48 Actual Average Earned Income of Households Affected by this Policy After Implementation of the Activity \$ 16,640.54 average earned income of Louis Chase Households	Exceeds Benchmark

SS #3: Increase in Positive Outcomes in Employment Status - Rent Reform (Farley)

Report the Baseline, Benchmark and Outcome data for each type of employment status for those head(s) of households affected by the self-sufficiency activity.				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Report the following information separately for each category:				
(1) Employed Full- Time	Head(s) of households in <<category name>> prior to implementation of the activity (number). This number may be zero.	Expected head(s) of households in <<category name>> after implementation of the activity (number).	Actual head(s) of households in <<category name>> after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
(2) Employed Part- Time				
(3) Enrolled in an Educational Program				
(4) Enrolled in Job Training Program				
(5) Unemployed				
(6) Other				
	Percentage of total work-able households in <<category name>> prior to implementation of activity (percent). This number may be zero.	Expected percentage of total work-able households in <<category name>> after implementation of the activity (percent).	Actual percentage of total work-able households in <<category name>> after implementation of the activity (percent).	
(1) Employed Full- Time	Number of work-able Farley households (19-61) = 70 Number of Farley households employed fulltime = 17 Percentage of Total Work-Able Farley Households <u>Employed Fulltime</u> Prior to Implementation of the Activity 24.3% Farley households employed fulltime	Expected number of work-able Farley households (19-61) = 70 Expected number of Farley households employed fulltime = 17 Actual Percentage of Total Work-Able Farley Households <u>Employed Fulltime</u> After Implementation of the Activity 24.3% Farley households employed fulltime	Actual number of work-able Farley households (19-61) = 72 Actual number of Farley households employed fulltime = 19 Expected Percentage of Total Work-Able Farley Households <u>Employed Fulltime</u> After Implementation of the Activity 26.4% Farley households employed fulltime	Exceeds Benchmark
(1) Employed Full- Time	Number of work-able Chase households (19-61) = 82 Number of Chase households employed fulltime = 15 Percentage of Total Work-Able Chase Households <u>Employed Fulltime</u> Prior to Implementation of the Activity 18.3% Chase households employed fulltime	Expected number of work-able Chase households (19-61) = 82 Expected number of Chase households employed fulltime = 15 Actual Percentage of Total Work-Able Chase Households <u>Employed Fulltime</u> After Implementation of the Activity 18.3% Chase households employed fulltime	Actual number of work-able Chase households (19-61) = 79 Actual number of Chase households employed fulltime = 11 Expected Percentage of Total Work-Able Chase Households <u>Employed Fulltime</u> After Implementation of the Activity 13.9% Chase households employed fulltime	Benchmark Not Achieved

SS #3: Increase in Positive Outcomes in Employment Status - Rent Reform (Farley) - continued

Report the Baseline, Benchmark and Outcome data for each type of employment status for those head(s) of households affected by the self-sufficiency activity.				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Report the following information separately for each category:				
(1) Employed Full- Time	Head(s) of households in <<category name>> prior to implementation of the activity (number). This number may be zero.	Expected head(s) of households in <<category name>> after implementation of the activity (number).	Actual head(s) of households in <<category name>> after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
(2) Employed Part- Time				
(3) Enrolled in an Educational Program				
(4) Enrolled in Job Training Program				
(5) Unemployed				
(6) Other				
	Percentage of total work-able households in <<category name>> prior to implementation of activity (percent). This number may be zero.	Expected percentage of total work-able households in <<category name>> after implementation of the activity (percent).	Actual percentage of total work-able households in <<category name>> after implementation of the activity (percent).	
(2) Employed Part- Time	Number of work-able Farley households (19-61) = 70 Number of Farley households employed part time = 23 Percentage of Total Work-Able Farley Households <u>Employed Part Time</u> Prior to Implementation of the Activity 32.9% Farley households employed part time	Expected number of work-able Farley households (19-61) = 70 Expected number of Farley households employed part time = 23 Actual Percentage of Total Work-Able Farley Households <u>Employed Part Time</u> After Implementation of the Activity 32.9% Farley households employed part time	Actual number of work-able Farley households (19-61) = 72 Actual number of Farley households employed part time = 24 Expected Percentage of Total Work-Able Farley Households <u>Employed Part Time</u> After Implementation of the Activity 33.3% Farley households employed part time	Exceeds Benchmark
(2) Employed Part- Time	Number of work-able Chase households (19-61) = 82 Number of Chase households employed part time = 21 Percentage of Total Work-Able Chase Households <u>Employed Part Time</u> Prior to Implementation of the Activity 25.6% Chase households employed part time	Expected number of work-able Chase households (19-61) = 82 Expected number of Chase households employed part time = 21 Actual Percentage of Total Work-Able Chase Households <u>Employed Part Time</u> After Implementation of the Activity 25.6% Chase households employed part time	Actual number of work-able Chase households (19-61) = 79 Actual number of Chase households employed part time = 19 Expected Percentage of Total Work-Able Chase Households <u>Employed Part Time</u> After Implementation of the Activity 24.1% Chase households employed part time	Benchmark Not Achieved

SS #3: Increase in Positive Outcomes in Employment Status - Rent Reform (Farley) - continued

Report the Baseline, Benchmark and Outcome data for each type of employment status for those head(s) of households affected by the self-sufficiency activity.				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Report the following information separately for each category:				
(1) Employed Full- Time	Head(s) of households in <<category name>> prior to implementation of the activity (number). This number may be zero.	Expected head(s) of households in <<category name>> after implementation of the activity (number).	Actual head(s) of households in <<category name>> after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
(2) Employed Part- Time				
(3) Enrolled in an Educational Program				
(4) Enrolled in Job Training Program				
(5) Unemployed				
(6) Other				
	Percentage of total work-able households in <<category name>> prior to implementation of activity (percent). This number may be zero.	Expected percentage of total work-able households in <<category name>> after implementation of the activity (percent).	Actual percentage of total work-able households in <<category name>> after implementation of the activity (percent).	
(5) Unemployed	Number of work-able Farley households (19-61) = 70 Number of Farley households unemployed = 44 Percentage of Total Work-Able Farley Households <u>Unemployed</u> Prior to Implementation of the Activity 62.9% Farley households unemployed	Expected number of work-able Farley households (19-61) = 70 Expected number of Farley households unemployed = 44 Expected Percentage of Total Work-Able Farley Households <u>Unemployed</u> After Implementation of the Activity 62.9% Farley households unemployed	Actual number of work-able Farley households (19-61) = 72 Actual number of Farley households unemployed = 28 Actual Percentage of Total Work-Able Farley Households <u>Unemployed</u> After Implementation of the Activity 38.9% Farley households unemployed	Exceeds Benchmark
(5) Unemployed	Number of work-able Chase households (19-61) = 82 Number of Chase households unemployed = 45 Percentage of Total Work-Able Chase Households <u>Unemployed</u> Prior to Implementation of the Activity 54.9% Chase households unemployed	Expected number of work-able Chase households (19-61) = 82 Expected number of Chase households unemployed = 45 Expected Percentage of Total Work-Able Chase Households <u>Unemployed</u> After Implementation of the Activity 54.9% Chase households unemployed	Actual number of work-able Chase households (19-61) = 79 Actual number of Chase households unemployed = 48 Actual Percentage of Total Work-Able Chase Households <u>Unemployed</u> After Implementation of the Activity 60.8% Chase households unemployed	Benchmark Not Achieved

SS #4: Households Removed from TANF - Rent Reform (Farley)

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households receiving TANF assistance (decrease).	Households receiving TANF prior to implementation of the activity (number)	Expected number of households receiving TANF after implementation of the activity (number).	Actual households receiving TANF after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
Farley households receiving TANF assistance (decrease).	<p>Number of Households Receiving TANF Prior to Implementation of the Activity</p> <p align="center">8</p> <p>Farley households receiving TANF</p>	<p>Expected Number of Households Receiving TANF After Implementation of the Activity</p> <p align="center">5</p> <p>Farley households receiving TANF</p>	<p>Actual Number of Households Receiving TANF After Implementation of the Activity</p> <p align="center">3</p> <p>Farley households receiving TANF</p>	Exceeds Benchmark
Chase households receiving TANF assistance (decrease).	<p>Number of Households Receiving TANF Prior to Implementation of the Activity</p> <p align="center">1</p> <p>Chase households receiving TANF</p>	<p>Expected Number of Households Receiving TANF After Implementation of the Activity</p> <p align="center">5</p> <p>Chase households receiving TANF</p>	<p>Actual Number of Households Receiving TANF After Implementation of the Activity</p> <p align="center">7</p> <p>Chase households receiving TANF</p>	Benchmark Not Achieved

SS #6: Reducing Per Unit Subsidy Costs for Participating Households - Rent Reform (Farley)				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average amount of Section 8 and/or 9 subsidy per household affected by this policy in dollars (decrease).	Average subsidy per household affected by this policy prior to implementation of the activity (in dollars).	Expected average subsidy per household affected by this policy after implementation of the activity (in dollars).	Actual average subsidy per household affected by this policy after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
Average amount of Section 9 subsidy per Farley household affected by this policy in dollars (decrease).	Total Section 9 subsidy = \$5,231,171 Total number of Public Housing units = 1,688 Section 9 Subsidy per Household Prior to Activity Implementation \$ 3,099 average Farley subsidy per household	Expected Section 9 subsidy = \$4,751,548 Expected number of Public Housing units = 1,688 Expected Section 9 Subsidy per Household After Activity Implementation \$ 2,815 average Farley subsidy per household	Actual Section 9 subsidy = \$5,057,392 Actual number of Public Housing units = 1,149 Actual Section 9 Subsidy per Household After Activity Implementation \$ 4,402 average Farley subsidy per household	Benchmark Not Achieved
Average amount of Section 9 subsidy per Chase household affected by this policy in dollars (decrease).	Total Section 9 subsidy = \$5,231,171 Total number of Public Housing units = 1,688 Section 9 Subsidy per Household Prior to Activity Implementation \$ 3,099 average Chase subsidy per household	Expected Section 9 subsidy = \$4,751,548 Expected number of Public Housing units = 1,688 Expected Section 9 Subsidy per Household After Activity Implementation \$ 2,815 average Chase subsidy per household	Actual Section 9 subsidy = \$5,057,392 Actual number of Public Housing units = 1,223 Actual Section 9 Subsidy per Household After Activity Implementation \$ 4,135 average Chase subsidy per household	Benchmark Not Achieved

SS #7: Increase in Agency Rental Revenue - Rent Reform (Farley)				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
PHA rental revenue in dollars (increase).	PHA rental revenue prior to implementation of the activity (in dollars).	Expected PHA rental revenue after implementation of the activity (in dollars).	Actual PHA rental revenue after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
PHA rental revenue in dollars (increase).	PHA rental revenue = \$2,249,908 Number of units = 1,497 PHA Rental Revenue Prior to Implementation of the Activity \$ 125.25 average PHA rental revenue per household	Expected PHA rental revenue = \$2,157,782 Expected number of units = 1,436 Expected PHA Rental Revenue After Implementation of the Activity \$ 125.22 average PHA rental revenue per household	Actual PHA rental revenue = \$1,816,077 Actual number of units = 1,085 Actual PHA Rental Revenue After Implementation of the Activity \$ 139.48 average PHA rental revenue per household	Exceeds Benchmark

SS #8: Households Transitioned to Self Sufficiency - Rent Reform (Farley)				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households transitioned to self sufficiency (increase). The PHA may create one or more definitions for "self sufficiency" to use for this metric. Each time the PHA uses this metric, the "Outcome" number should also be provided in Section (II) Operating Information in the space provided.	Households transitioned to self sufficiency (<<PHA definition of self-sufficiency>>) prior to implementation of the activity (number). This number may be zero.	Expected households transitioned to self sufficiency (<<PHA definition of self-sufficiency>>) after implementation of the activity (number).	Actual households transitioned to self sufficiency (<<PHA definition of self-sufficiency>>) after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
Number of households transitioned to self sufficiency (increase).	Number of months households have been employed = 0	Expected number of months households have been employed = 6	Actual number of months households have been employed = 0	Benchmark Not Achieved
	Number of households receiving tiered rent incentive for employment = 0	Expected number of households receiving tiered rent incentive for employment = 1	Actual number of households receiving tiered rent incentive for employment = 0	
	Number of Previously Unemployed Households Employed for 24 consecutive Months or Longer Prior to Activity Implementation	Expected Number of Previously Unemployed Households Employed for 24 consecutive Months or Longer After Activity Implementation	Actual Number of Previously Unemployed Households Employed for 24 consecutive Months or Longer After Activity Implementation	
	0.0	6.0	0.0	
	average number of months employed	average number of months employed	average number of months employed	

Regarding unachieved anticipated metrics, HACG attributes shortfalls in these areas to the local economy, HACG's portfolio conversion, and HACG's planned re-development. Columbus' unemployment rate (5.1%)¹⁰ was higher during the reporting period than the City of Augusta-Richmond County (4.6%)¹⁰, a comparable sized city and government set up, than the City of Atlanta (4.1%)¹⁰, the State Capitol, and the State of Georgia's unemployment rate (4.4%)¹⁰. Additionally, HACG's portfolio conversion activities caused 'unlike' comparisons in subsidies. Further, the conversion activities caused some working families not to return to HACG communities. Many of these families were replaced by lower-income, higher subsidy families. Finally, HACG's planned redevelopment of Chase contributes to unachieved benchmarks. It is plausible that many families are anticipating the receipt of a voucher during FYE2018 and therefore preparing to move. However, HACG is not close to finalizing redevelopment plans for Chase, the Comparable/Control Site in this activity.

¹⁰Source: GA Department of Labor (GA DOL) Area Unemployment Rate and Labor Force Estimates

Because of portfolio conversion activities, planned redevelopment, and other variables, HACG plans to close-out this activity, so adjustments to this activity are not being considered. Meanwhile, the activity is on schedule and the annual benchmarks are listed below:

Annual Benchmark						
Unit of Measurement	Baseline FY 2014	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019
Farley tenant rental revenue in dollars (increase).	\$ 90.91	\$ 90.91	\$ 93.64	\$ 96.45	\$ 99.34	\$ 102.32
Chase tenant rental revenue in dollars (increase).	\$ 93.19	\$ 93.19	\$ 95.99	\$ 98.87	\$ 101.83	\$ 104.89
Average earned income of Farley households affected by this policy in dollars (increase).	\$ 12,530.00	\$ 13,282.00	\$ 13,680.46	\$ 14,090.87	\$ 14,513.60	\$ 14,949.01
Average earned income of Chase households affected by this policy in dollars (increase).	\$ 13,697.00	\$ 13,697.00	\$ 14,107.91	\$ 14,531.15	\$ 14,967.08	\$ 15,416.09
Percentage of Farley work-able households Employed Fulltime prior to implementation of activity (percent). This number may be zero.	24.3%	24.3%	25.0%	25.8%	26.5%	27.3%
Percentage of Chase work-able households Employed Fulltime prior to implementation of activity (percent). This number may be zero.	18.3%	18.3%	18.8%	19.4%	20.0%	20.6%
Percentage of Farley work-able households Employed Part Time prior to implementation of activity (percent). This number may be zero.	32.9%	32.9%	33.8%	34.9%	35.9%	37.0%
Percentage of Chase work-able households Employed Part Time prior to implementation of activity (percent). This number may be zero.	25.6%	25.6%	26.4%	27.2%	28.0%	28.8%

Annual Benchmark						
Unit of Measurement	Baseline FY 2014	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019
Percentage of Farley work-able households Unemployed prior to implementation of activity (percent). This number may be zero.	62.9%	62.9%	61.0%	59.1%	57.4%	55.6%
Percentage of Chase work-able households Unemployed prior to implementation of activity (percent). This number may be zero.	54.9%	54.9%	53.2%	51.6%	50.1%	48.6%
Farley households receiving TANF assistance (decrease)	8	5	5	4	4	3
Chase households receiving TANF assistance (decrease)	1	5	5	4	4	3
Average amount of Section 9 subsidy per Farley household affected by this policy in dollars (decrease).	\$ 3,099.03	\$ 2,814.90	\$ 2,814.90	\$ 2,786.75	\$ 2,758.88	\$ 2,731.29
Average amount of Section 9 subsidy per Chase household affected by this policy in dollars (decrease).	\$ 3,099.03	\$ 2,814.90	\$ 2,814.90	\$ 2,786.75	\$ 2,758.88	\$ 2,731.29
PHA rental revenue in dollars (increase).	\$ 125.25	\$ 125.22	\$ 128.98	\$ 132.85	\$ 136.83	\$ 140.94
Number of households transitioned to self sufficiency (increase).	0.0	6.0	6.1	6.1	6.2	6.2

The approval year, FYE2014, was used to increase the minimum rent, market the financial incentives, set preliminary baselines and benchmarks for the activity while actively promoting the FSS Program. The following year, FYE2015, HACG moved the minimum rent to its full value and to fully implement the activity, while adjusting the baseline and benchmarks to realistic, achievable levels for the remainder of the demonstration period.

Since implementation, the activity includes modifications that exclude HACG's PH units because HACG is approved for a full portfolio conversion of its PH units to PBV units under the RAD Program. HACG also elected to use LIHTC funds to meet certain RAD requirements and this decision, to use LIHTC funds, requires HACG to review LIHTC units annually. Therefore, the annual review requirement, in addition to others, negates the effective use of this activity for PH units. Consequently, HACG discontinues the use of MTW Authorization C.4 to review eligible households every 3-years.

HACG moved from Emphasys as its client tracking software to YARDI during FYE2016. HACG staff is still learning the full capabilities of YARDI. HACG staff continues to manually collect data from both systems to provide as accurate a picture as possible for Planning and Reporting purposes.

Activity **2015.02 – Portability Restrictions** was introduced and **approved in HACG’s FY2015 Annual MTW Plan** and implemented during the same fiscal year as approval.

The activity utilizes MTW Authorization D.1.g listed in Attachment C of the MTW Agreement to limit the number of Housing Choice Vouchers (HCVs) that enter or leave HACG’s jurisdiction by establishing its own portability policies with other MTW and non-MTW housing authorities because port-in and port-out HCVs significantly influence the amount of families that a PHA can assist in its jurisdiction.

The activity limits jurisdictional port-ins and port-outs to verifiable employment reasons. HCV families seeking to port-into HACG’s jurisdiction need to secure a transfer letter on company letterhead or similar document and have at least 6 months of consecutive employment with the company before HACG approves and/or absorbs the incoming port. Similarly, HACG families seeking to port-out of HACG’s jurisdiction need to secure an offer letter or intent to employ statement on letterhead from the prospective employer, a transfer letter/orders from the company, or substantially similar document before relocating to the area and before HACG approves the outgoing port. This activity limits the movement of vouchers to ensure that HACG’s budget authority is robust enough to assist local families, while reducing payments in higher jurisdictions and/or masquerading efforts as a collection agency when trying to get payments from outside jurisdictions. Both activities, higher payments and payment collections, commit a significant portion of resources to activities that limit the amount of help that HACG can provide locally.

Nonetheless, HACG understands that some relocations are required beyond employment reasons, such as medical and Violence Against Women Act (**VAWA**) related reasons. HACG is committed to meeting such requirements on a case-by-case basis through written hardship submitted to the Tenant Selection Office (**TSO**) for properly submitted and properly supported hardships.

Since implementation, the Agency has not received any hardship requests under any genre beyond Veterans Affairs Supportive Housing (**VASH**) voucher related requests. Further, the Agency has not received any remarkable feedback, positive or negative, regarding the limitations placed on its voucher portability.

This activity does not meet the definition of rent reform.

HUD Standard Metrics for HACG's Portability Restriction MTW Activity:

<i>CE #1: Agency Cost Savings</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	Cost of task prior to implementation of the activity (in dollars).	Expected cost of task after implementation of the activity (in dollars).	Actual cost of task after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
Total cost of task in dollars (decrease).	Average compensation (salary & benefits) of Occupancy Specialists, Accounts Payable, and Section 8 Coordinator = \$32.77/hour	Expected average compensation of Occupancy Specialists, Accounts Payable, and Section 8 Coordinator = \$32.77/hour	Actual average compensation (salary & benefits) of Occupancy Specialists, Accounts Payable, and Section 8 Coordinator = \$34.76/hour	Exceeds Benchmark
	Time to manage port clients (63 in; 91 out) = 42 hours per month	Expected time to manage port clients (63 in; 91 out) = 42 hours per month	Actual time to manage port clients (52 in; 0 out) = 28 hours per month	
	Cost of Port Management Prior to Implementation of the Activity	Expected Cost of Port Management After Implementation of the Activity	Actual Cost of Port Management After Implementation of the Activity	
	\$ 211,956.36 cost to manage portability clients	\$ 211,956.36 cost to manage portability clients	\$ 50,610.56 cost to manage portability clients	

<i>CE #2: Staff Time Savings</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	Total amount of staff time dedicated to the task prior to implementation of the activity (in hours).	Expected amount of total staff time dedicated to the task after implementation of the activity (in hours).	Actual amount of total staff time dedicated to the task after implementation of the activity (in hours).	Whether the outcome meets or exceeds the benchmark.
Total time to complete the task in staff hours (decrease).	Estimated staff time of Occupancy Specialists, Accounts Payable, and Section 8 Coordinator = 42 hours per month	Expected staff time of Occupancy Specialists, Accounts Payable, and Section 8 Coordinator = 42 hours per month	Actual staff time of Occupancy Specialists, Accounts Payable, and Section 8 Coordinator = 28 hours per month	Exceeds Benchmark
	Number of port clients = 154 (63 in; 91 out)	Expected number of port clients = 154 (63 in; 91 out)	Actual number of port clients = 52 (52 in; 0 out)	
	Total Amount of Staff Time Dedicated to Port Clients Prior to Implementation of the Activity	Expected Amount of Staff Time Dedicated to Port Clients After Implementation of the Activity	Actual Amount of Staff Time Dedicated to Port Clients Prior to Implementation of the Activity	
	6,468.0 staff hours	6,468.0 staff hours	1,456.0 staff hours	

CE #5: Increase in Tenant Rent Share				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Tenant rental revenue in dollars (increase).	Tenant rental revenue prior to implementation of the activity (in dollars).	Expected tenant rental revenue after implementation of the activity (in dollars).	Actual tenant rental revenue after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
Tenant rental revenue in dollars (increase).	Tenant revenue received = Unk Number of tenants = Unk Number of portability clients = 154 Tenant Rental Revenue Prior to Implementation of the Activity \$ - tenant rental revenue	Expected tenant revenue received = Unk Expected number of tenants = Unk Expected number of portability clients = 154 Expected Tenant Rental Revenue After Implementation of the Activity \$ - tenant rental revenue	Actual tenant revenue received = Unk Actual number of tenants = Unk Actual number of portability clients = 52 Actual Tenant Rental Revenue After Implementation of the Activity \$ - tenant rental revenue	Meets Benchmark

SS #1: Increase in Household Income				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average earned income of households affected by this policy in dollars (increase).	Average earned income of households affected by this policy prior to implementation of the activity (in dollars).	Expected average earned income of households affected by this policy prior to implementation of the activity (in dollars).	Actual average earned income of households affected by this policy prior to implementation (in dollars).	Whether the outcome meets or exceeds the benchmark.
Average earned income of households affected by this policy in dollars (increase).	Earned income of Section 8 households = Unk Number of Section 8 households = Unk Number of portability households = 154 Average Earned Income of Portability Clients Prior to Implementation of the Activity \$ - average earned income	Expected earned income of Section 8 households = Unk Expected number of Section 8 households = Unk Expected number of portability households = 154 Expected Average Earned Income of Portability Clients After Implementation of the Activity \$ - average earned income	Actual earned income of Section 8 households = Unk Actual number of Section 8 households = Unk Actual number of portability households = 52 Actual Average Earned Income of Portability Clients After Implementation of the Activity \$ - average earned income	Meets Benchmark

SS #3: Increase in Positive Outcomes in Employment Status

Report the Baseline, Benchmark and Outcome data for each type of employment status for those head(s) of households affected by the self-sufficiency activity.

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Report the following information separately for each category:				
(1) Employed Full- Time	Head(s) of households in <<category name>> prior to implementation of the activity (number). This number may be zero.	Expected head(s) of households in <<category name>> after implementation of the activity (number).	Actual head(s) of households in <<category name>> after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
(2) Employed Part- Time				
(3) Enrolled in an Educational Program				
(4) Enrolled in Job Training Program				
(5) Unemployed				
(6) Other				
	Percentage of total work-able households in <<category name>> prior to implementation of activity (percent). This number may be zero.	Expected percentage of total work-able households in <<category name>> after implementation of the activity (percent).	Actual percentage of total work-able households in <<category name>> after implementation of the activity (percent).	Whether the outcome meets or exceeds the benchmark.
(1) Employed Full- Time	Number of portability work-able households (19-61) = Unk Number of work-able households Employed Fulltime = Unk Percentage of Work-Able Households Employed Fulltime Prior to Implementation of the Activity 0% employed fulltime	Expected number of portability work-able households (19-61) = Unk Expected number of work-able households Employed Fulltime = Unk Expected Percentage of Work-Able Households Employed Fulltime After Implementation of the Activity 0% employed fulltime	Actual number of portability work-able households (19-61) = Unk Actual number of work-able households Employed Fulltime = Unk Actual Percentage of Work-Able Households Employed Fulltime After Implementation of the Activity 0% employed fulltime	Meets Benchmark
(2) Employed Part- Time	Number of portability work-able households (19-61) = Unk Number of work-able households Employed Part time = Unk Percentage of Work-Able Households Employed Part Time Prior to Implementation of the Activity 0% employed part time	Expected number of portability work-able households (19-61) = Unk Expected number of work-able households Employed Part time = Unk Expected Percentage of Work-Able Households Employed Part Time After Implementation of the Activity 0% employed part time	Actual number of portability work-able households (19-61) = Unk Actual number of work-able households Employed Part time = Unk Actual Percentage of Work-Able Households Employed Part Time After Implementation of the Activity 0% employed part time	Meets Benchmark

SS #3: Increase in Positive Outcomes in Employment Status - continued

Report the Baseline, Benchmark and Outcome data for each type of employment status for those head(s) of households affected by the self-sufficiency activity.

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
(5) Unemployed	Number of portability work-able households (19-61) = Unk	Expected number of portability work-able households (19-61) = Unk	Actual number of portability work-able households (19-61) = Unk	Meets Benchmark
	Number of work-able households Unemployed = Unk	Expected number of work-able households Unemployed = Unk	Actual number of work-able households Unemployed = Unk	
	Percentage of Work-Able Households Unemployed Prior to Implementation of the Activity	Expected Percentage of Work-Able Households Unemployed After Implementation of the Activity	Actual Percentage of Work-Able Households Unemployed After Implementation of the Activity	
	0% unemployed	0% unemployed	0% unemployed	

SS #4: Households Removed from Temporary Assistance for Needy Families (TANF)

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households receiving TANF assistance (decrease).	Households receiving TANF prior to implementation of the activity (number)	Expected number of households receiving TANF after implementation of the activity (number).	Actual households receiving TANF after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
Number of households receiving TANF assistance (decrease).	Households Receiving TANF Prior to Implementation of the Activity 0 households receiving TANF	Expected Households Receiving TANF After Implementation of the Activity 0 households receiving TANF	Actual Households Receiving TANF After Implementation of the Activity 0 households receiving TANF	Meets Benchmark

<i>SS #8: Households Transitioned to Self Sufficiency</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households transitioned to self sufficiency (increase). The PHA may create one or more definitions for "self sufficiency" to use for this metric. Each time the PHA uses this metric, the "Outcome" number should also be provided in Section (II) Operating Information in the space provided.	Households transitioned to self sufficiency (<<PHA definition of self-sufficiency>>) prior to implementation of the activity (number). This number may be zero.	Expected households transitioned to self sufficiency (<<PHA definition of self-sufficiency>>) after implementation of the activity (number).	Actual households transitioned to self sufficiency (<<PHA definition of self-sufficiency>>) after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
Number of households transitioned to self sufficiency (increase).	Households transitioned to self sufficiency (increase in earned income) among port clients (63 in; 91 out) = Unk Portability Households Reporting Earned Income Prior to Implementation of the Activity 0 portability households reporting earned income	Expected households transitioned to self sufficiency (increase in earned income) among port clients (63 in; 91 out) = Unk Expected Portability Households Reporting Earned Income After Implementation of the Activity 0 portability households reporting earned income	Actual households transitioned to self sufficiency (increase in earned income) among port clients (52 in; 0 out) = 52 Actual Portability Households Reporting Earned Income After Implementation of the Activity 0 portability households reporting earned income	Meets Benchmark

The approval year, FYE2015, was used to identify existing port families to extend those families a “grandfathering” clause, thus allowing those identified families to continue port activity before the implementation of this activity. Further, the approval year was used to set the baseline after the identification of families and similar activities. FYE2016 was used to fully implement the activity and set realistic, achievable benchmarks for this activity for the remainder of the demonstration period. The activity is on schedule and the annual benchmarks are listed on the next page:

Annual Benchmark						
Unit of Measurement	Baseline FY 2015	FY 2016	FY 2017	FY 2018	FY 2019	FY 2020
Total cost of task in dollars (decrease)	\$ 211,956.36	\$ 211,956.36	\$ 187,182.24	\$ 187,182.24	\$ 183,053.22	\$ 178,924.20
Total time to complete the task in staff hours (decrease)	6,468.0	6,468.0	5,712.0	5,712.0	5,586.0	5,460.0
Tenant rental revenue in dollars (increase)	0	0	0	0	0	0
Average earned income of households affected by this policy in dollars (increase)	0	0	0	0	0	0
Percentage of total work-able households employed fulltime	0%	0%	0%	0%	0%	0%
Percentage of total work-able households employed part time	0%	0%	0%	0%	0%	0%
Percentage of total work-able households employed unemployed	0%	0%	0%	0%	0%	0%
Number of households receiving TANF assistance (decrease)	0	0	0	0	0	0
Number of households transitioned to self-sufficiency (report an increase in earned income)	0	0	0	0	0	0

HACG moved from Emphasys as its client tracking software to YARDI during FYE2016. HACG staff is still learning the full capabilities of YARDI. HACG staff continues to manually collect data from both systems to provide as accurate a picture as possible for Planning and Reporting purposes.

Activity **2015.03 – Simplify Utility Allowance Calculation** was introduced and **approved in HACG’s FY2015 Annual MTW Plan** and re-proposed and approved in HACG Amended FYE2016 Annual MTW Plan and implemented during the same fiscal year as approval respectively.

The activity uses MTW Authorization D.2.a listed in Attachment C of the MTW Agreement to use multiple utility allowance charts as identified below:

Utility Allowance Chart	Program Application
Simplified Utility Allowance (Tenant/Landlord Based)	Tenant-Based Voucher (TBV)
Public Housing	Public Housing (PH) and RAD PBV (former PH units converted to Section 8 assisted PBV units under RAD)
Energy Studies	Mixed-Finance Units (subsidized units located in mixed-finance communities)

Prior utility allowance charts were confusing and involved multiple variables that frustrated all involved parties. These variables delayed the rental assistance process from moving forward. This activity seeks to simplify utility allowance calculations for case managers, families, and landlords involved with the subsidized housing process that includes RAD conversions and mixed-finance communities as well.

HACG received a full award to convert its entire PH portfolio under RAD. This full portfolio award in addition to received feedback from GA DCA played a significant role in HACG amending its FYE2016 Annual MTW Plan. Through the amendment, HACG clarified its original intent with the creation and separation of Utility Allowance Calculation Charts. These charts simplify the process for HACG clients, landlord partners, and staff, while meeting the compliance challenges raised by DCA regarding the RAD Program.

Although specific feedback has not been solicited from HACG clients, landlord partners, nor staff, the Simplified Utility Allowance Calculation Charts appear to be well-received.

This activity does not meet the definition of rent reform.

HUD Standard Metrics for HACG’s Simplified Utility Allowance Calculation MTW Activity:

<i>CE #1: Agency Cost Savings</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	Cost of task prior to implementation of the activity (in dollars).	Expected cost of task after implementation of the activity (in dollars).	Actual cost of task after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
Total cost of task in dollars (decrease).	Average compensation (salary & benefits) of Occupancy Specialists = \$24.50 per hour	Expected average compensation (salary & benefits) of Occupancy Specialists = \$24.50 per hour	Actual average compensation (salary & benefits) of Occupancy Specialists = \$26.00 per hour	Exceeds Benchmark
	Estimated time to conduct annual/interim recertification examinations = 2.00 hours	Expected estimated time to conduct annual/interim recertification examinations = 2.00 hours	Actual time to conduct annual/interim recertification examinations = 1.42 hours	
	Number of voucher holding clients = 2,333	Expected number of voucher holding clients = 2,286	Actual number of voucher holding clients = 2,558	
	Cost of Annual/Interim Recertification Examinations Prior to Implementation of the Activity	Expected Cost of Annual/Interim Recertification Examinations After Implementation of the Activity	Actual Cost of Annual/Interim Recertification Examinations After Implementation of the Activity	
	\$ 114,317.00	\$ 112,030.66	\$ 92,552.53	
	agency costs	agency costs	agency costs	

CE #2: Staff Time Savings				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	Total amount of staff time dedicated to the task prior to implementation of the activity (in hours).	Expected amount of total staff time dedicated to the task after implementation of the activity (in hours).	Actual amount of total staff time dedicated to the task after implementation of the activity (in hours).	Whether the outcome meets or exceeds the benchmark.
Total time to complete the task in staff hours (decrease).	Estimated staff time dedicated to conduct annual/interim recertification examinations = 2.00 hours Number of voucher holding clients = 2,333 Amount of Staff Time Dedicated to Annual/Interim Examinations Prior to Implementation of the Activity 4,666.0 staff hours	Expected staff time dedicated to conduct annual/interim recertification examinations = 2.00 hours Expected number of voucher holding clients = 2,286 Expected Amount of Staff Time Dedicated to Annual/Interim Examinations After Implementation of the Activity 4,572.0 staff hours	Actual staff time dedicated to conduct annual/interim recertification examinations = 1.42 hours Actual number of voucher holding clients = 2,558 Actual Amount of Staff Time Dedicated to Annual/Interim Examinations After Implementation of the Activity 3,632.4 staff hours	Exceeds Benchmark

CE #3: Decrease in Error Rate of Task Execution				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average error rate in completing a task as a percentage (decrease).	Average error rate of task prior to implementation of the activity (percentage).	Expected average error rate of task after implementation of the activity (percentage).	Actual average error rate of task after implementation of the activity (percentage).	Whether the outcome meets or exceeds the benchmark.
Average error rate in completing a task as a percentage (decrease).	Number of Housing Choice Voucher files reviewed = 38 Number of file errors detected = 5 Average Error Rate of Housing Choice Voucher Files Prior to Implementation of the Activity 13.2% average error rate	Expected number of Housing Choice Voucher files reviewed = 47 Expected number of file errors detected = 4 Expected Average Error Rate of Housing Choice Voucher Files After Implementation of the Activity 8.5% average error rate	Actual number of Housing Choice Voucher files reviewed = Unk Actual number of file errors detected = Unk Actual Average Error Rate of Housing Choice Voucher Files After Implementation of the Activity Unk average error rate	No

CE #5: Increase in Tenant Rent Share				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Tenant rental revenue in dollars (increase).	Tenant rental revenue prior to implementation of the activity (in dollars).	Expected tenant rental revenue after implementation of the activity (in dollars).	Actual tenant rental revenue after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
Tenant rental revenue in dollars (increase).	Tenant rental revenue = \$314,834 Number of tenants = 2,099 Tenant Rental Revenue Prior to Implementation of the Activity \$ 149.99 tenant rental revenue	Expected tenant rental revenue = \$324,279 Expected number of tenants = 2,162 Expected Tenant Rental Revenue After Implementation of the Activity \$ 149.99 tenant rental revenue	Actual tenant rental revenue = \$216,901 Actual number of tenants = 1,470 Actual Tenant Rental Revenue After Implementation of the Activity \$ 147.55 tenant rental revenue	No

The recent approval year, FYE2016, was used to set “soft” baselines and corresponding benchmarks for the activity since the activity approval took place well into the fiscal year. FYE2017 was used to fully implement this activity with all Simplified Utility Allowance Calculation Charts, set the baselines, and realistic, achievable benchmarks for this activity for the remainder of the demonstration period.

Regarding unachieved anticipated metrics, HACG attributes shortfalls in these areas to HACG’s portfolio conversion. HACG’s portfolio conversion activities commanded an inordinate amount of time and caused some tasks to be overlooked. Unfortunately, error rates were not tracked separately as intake, modernization, recertification, relocation, and similar conversion activities ran concurrently.

HACG plans to incorporate lessons learned to ensure all metrics are monitored and tracked through its compliance and resident services divisions. Meanwhile, the activity is on schedule and the annual benchmarks are listed below:

Annual Benchmark						
Unit of Measurement	Baseline FY 2014	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019
Total cost of task in dollars (decrease).	\$ 114,317.00	\$ 112,030.66	\$ 102,508.05	\$ 98,026.83	\$ 93,545.60	\$ 88,504.22
Total time to complete the task in staff hours (decrease).	4,666.0	4,572.0	4,184.0	4,001.1	3,818.2	3,612.4
Average error rate in completing a task as a percentage (decrease).	13.2%	8.5%	8.5%	6.4%	6.4%	6.4%
Tenant rental revenue in dollars (increase).	\$ 149.99	\$ 149.99	\$ 151.55	\$ 153.79	\$ 155.89	\$ 158.23

HACG moved from Emphasys as its client tracking software to YARDI during FYE2016. HACG staff is still learning the full capabilities of YARDI. HACG staff continues to manually collect data from both systems to provide as accurate a picture as possible for Planning and Reporting purposes.

Activity **2015.04 – Cap Childcare Deductions** was introduced and **approved in HACG’s FY2015 Annual MTW Plan** and implemented during the same fiscal year as approval.

The activity utilizes MTW Authorizations C.11 and D.2.a listed in Attachment C of the MTW Agreement to limit the amount of childcare deductions that a family can claim by establishing definitions of income and adjusted income for public housing units and by establishing subsidy levels for tenant-based assistance for Housing Choice Voucher (HCV) units that differ from the currently mandated program requirements in the 1937 Act and its implementing regulations.

The activity seeks to minimize the amount of childcare services and charges being claimed. Generally, families provide the cost of childcare paid at their recertification examination, which can be provided by family members. These projected and actual costs reduce a family’s household income and influence the family’s Total Tenant Payment (**TTP**). HACG experienced an abnormal amount of childcare service provided by family members that charged rates similarly equal to the household income.

Based on the trend, HACG introduced this activity to regulate childcare service providers and/or charges to closely mirror the local Division of Family and Children Services (**DFCS**) Children and Parents Services (**CAPS**) Program reimbursement guidelines and schedule. Overall, families are eligible to use whatever service provider they desire, but HACG will not factor payments above the CAPS Program reimbursement rate.

Based on various sources, discussions about this activity have been less than positive by both staff and residents. Implementation of this activity has not been the same across the board. This makes tracking and reporting the activity a frustrating challenge; however, senior leadership elects to maintain the activity with no planned modifications to change the activity.

Although less than complementary discussions have ensued about this activity, HACG has not received any written hardship requests related to this activity.

This activity does not meet the definition of rent reform.

HUD Standard Metrics for HACG’s Cap Childcare Deductions MTW Activity:

<i>CE #1: Agency Cost Savings</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	Cost of task prior to implementation of the activity (in dollars).	Expected cost of task after implementation of the activity (in dollars).	Actual cost of task after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
Total cost of task in dollars (decrease).	Average compensation (salary & benefits) of Housing Managers = \$29.13; Occupancy Specialists = \$24.50 per hour	Expected average compensation (salary & benefits) of Housing Managers = \$29.13; Occupancy Specialists = \$24.50 per hour	Actual compensation (salary & benefits) of Housing Managers = \$30.90; Occupancy Specialists = \$26.00 per hour	No
	Estimated time to conduct annual/interim recertification examinations for Public Housing = 1.83; Housing Choice Vouchers = 2.00 hours	Expected time to conduct annual/interim recertification examinations for Public Housing = 1.83; Housing Choice Vouchers = 2.00 hours	Actual time to conduct annual/interim recertification examinations for Public Housing = 1.83; Housing Choice Vouchers = 2.00 hours	
	Number of Public Housing units = 1,717; Housing Choice Voucher units = 2,333	Expected number of Public Housing units = 1,683; Housing Choice Voucher units = 2,286	Actual number of Public Housing units = 1,244; Housing Choice Voucher units = 2,713	
	Cost of Annual/Interim Recertification Examinations Prior to Implementation of the Activity	Expected Cost of Annual/Interim Recertification Examinations After Implementation of the Activity	Actual Cost of Annual/Interim Recertification Examinations After Implementation of the Activity	
	\$ 102,923.33 agency cost	\$ 100,865.60 agency cost	\$ 105,710.23 agency cost	

CE #2: Staff Time Savings				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	Total amount of staff time dedicated to the task prior to implementation of the activity (in hours).	Expected amount of total staff time dedicated to the task after implementation of the activity (in hours).	Actual amount of total staff time dedicated to the task after implementation of the activity (in hours).	Whether the outcome meets or exceeds the benchmark.
Total time to complete the task in staff hours (decrease).	<p>Estimated staff time dedicated to conduct Public Housing annual/interim recertification examinations = 1.83; Housing Choice Vouchers = 2.00 hours</p> <p>Number of Public Housing units = 1,717; Housing Choice Voucher units = 2,333</p> <p>Amount of Staff Time Dedicated to Annual/Interim Examinations Prior to Implementation of the Activity</p> <p>3,904.1</p> <p>staff hours</p>	<p>Expected staff time dedicated to conduct Public Housing annual/interim recertification examinations = 1.83; Housing Choice Vouchers = 2.00 hours</p> <p>Expected number of Public Housing units = 1,683; Housing Choice Voucher units = 2,286</p> <p>Expected Amount of Staff Time Dedicated to Annual/Interim Examinations After Implementation of the Activity</p> <p>3,825.9</p> <p>staff hours</p>	<p>Actual staff time dedicated to conduct Public Housing annual/interim recertification examinations = 1.83; Housing Choice Vouchers = 2.00 hours</p> <p>Expected number of Public Housing units = 1,244; Housing Choice Voucher units = 2,713</p> <p>Actual Amount of Staff Time Dedicated to Annual/Interim Examinations After Implementation of the Activity</p> <p>3,851.3</p> <p>staff hours</p>	No

CE #3: Decrease in Error Rate of Task Execution				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average error rate in completing a task as a percentage (decrease).	Average error rate of task prior to implementation of the activity (percentage).	Expected average error rate of task after implementation of the activity (percentage).	Actual average error rate of task after implementation of the activity (percentage).	Whether the outcome meets or exceeds the benchmark.
Average error rate in completing a task as a percentage (decrease).	<p>Number of Public Housing files reviewed = 40; Housing Choice Voucher = 38</p> <p>Number of Public Housing file errors detected = 19; Housing Choice Voucher errors = 5</p> <p>Average Error Rate of Housing Choice Voucher Files Prior to Implementation of the Activity</p> <p>30.3%</p> <p>average error rate</p>	<p>Expected number of Public Housing files reviewed = 76; Housing Choice Voucher = 64</p> <p>Expected number of Public Housing file errors detected = 14; Housing Choice Voucher errors = 9</p> <p>Expected Average Error Rate of Housing Choice Voucher Files After Implementation of the Activity</p> <p>16.3%</p> <p>average error rate</p>	<p>Actual number of Public Housing files reviewed = Unk; Housing Choice Voucher = Unk</p> <p>Actual number of Public Housing file errors detected = Unk; Housing Choice Voucher errors = Unk</p> <p>Actual Average Error Rate of Housing Choice Voucher Files After Implementation of the Activity</p> <p>Unk</p> <p>average error rate</p>	No

CE #5: Increase in Tenant Rent Share

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Tenant rental revenue in dollars (increase).	Tenant rental revenue prior to implementation of the activity (in dollars).	Expected tenant rental revenue after implementation of the activity (in dollars).	Actual tenant rental revenue after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
Tenant rental revenue in dollars (increase).	Tenant rental revenue for Public Housing = \$2,249,908; Housing Choice Voucher = \$314,834 Number of Public Housing units = 17,958; Housing Choice Voucher = 2,099 Tenant Rental Revenue Prior to Implementation of the Activity \$ 137.64 average tenant monthly rent share	Expected tenant rental revenue for Public Housing = \$2,249,908; Housing Choice Voucher = \$324,279 Expected number of Public Housing units = 17,958; Housing Choice Voucher = 2,162 Expected Tenant Rental Revenue After Implementation of the Activity \$ 137.64 average tenant monthly rent share	Actual tenant rental revenue for Public Housing = \$1,816,077; Housing Choice Voucher = \$216,901 Actual number of Public Housing units = 13,017; Housing Choice Voucher = 1,470 Actual Tenant Rental Revenue After Implementation of the Activity \$ 143.53 average tenant monthly rent share	Exceeds Benchmark

The approval year, FYE2015, was used to set “soft” baselines and corresponding benchmarks with full implementation consideration planned for FYE2016. However, because of HACG lost key planners of the activity and amended its FYE2016 Plan relating to its full portfolio conversion award, the activity was not fully implemented between programs.

Consequently, HACG used FYE2017 to implement the activity in its entirety under new leadership and an approved, Amended FYE2016 Annual MTW Plan and finalize baselines and realistic, achievable benchmarks for this activity for the remainder of the activity’s demonstration period.

Regarding unachieved anticipated metrics, HACG attributes shortfalls in these areas to HACG’s portfolio conversion. HACG’s portfolio conversion activities commanded an inordinate amount of time and caused some tasks to be overlooked. Unfortunately, error rates were not tracked separately as intake, modernization, recertification, relocation, and similar conversion activities ran concurrently. Further, the additional examinations because of converting to PBV units and using LIHTC funds actually extended eligibility review time and negated any savings anticipated by the use of MTW waivers.

HACG plans to incorporate lessons learned to ensure all metrics are monitored and tracked through its compliance and resident services divisions. Meanwhile, the activity is on schedule and the annual benchmarks are listed below:

Annual Benchmark						
Unit of Measurement	Baseline FY 2014	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019
Total cost of task in dollars (decrease).	\$ 102,923.33	\$ 100,865.60	\$ 92,182.94	\$ 87,736.50	\$ 83,535.19	\$ 81,014.87
Total time to complete the task in staff hours (decrease).	3,904.1	3,825.9	3,497.0	3,329.8	3,171.1	3,068.2
Average error rate in completing a task as a percentage (decrease).	30.3%	16.3%	14.9%	13.4%	12.0%	10.5%
Tenant rental revenue in dollars (increase).	\$ 137.64	\$ 137.64	\$ 138.57	\$ 140.21	\$ 140.21	\$ 144.42

HACG moved from Emphasys as its client tracking software to YARDI during FYE2016. HACG staff is still learning the full capabilities of YARDI. HACG staff continues to manually collect data from both systems to provide as accurate a picture as possible for Planning and Reporting purposes.

Activity **2016.02 – Non-Competitive Project-Basing Process** was introduced and **approved in HACG’s FY2016 Annual MTW Plan** and implemented during the same fiscal year as approval (based on construction completion).

The activity utilizes MTW Authorizations D.7.a listed in Attachment C of the MTW Agreement to provide the Agency with the ability to project-base Section 8 assistance at properties owned directly/indirectly by the Agency that are not public housing. Project-based assistance for such owned units does not need to undergo the competitive bid process.

This activity improves cost efficiency for the Agency and increases housing choices for low-income families. Since approval of the activity, HACG used flexibilities granted within this activity to project-base Section 8 assistance at its recently constructed Patriot Pointe Community. Further, HACG anticipates applying granted flexibilities of the activity at its Columbus Commons Community sometime during FYE2018¹¹. Additionally, HACG intends to apply granted flexibilities of this activity at future construction, rehabilitation, and/or renovation projects over the demonstration period.

HACG has not received any pushback on this activity and does not anticipate any pushback beyond internal discussion on the application of the flexibility at existing and planned projects.

This activity does not meet the definition of rent reform.

HUD Standard Metrics for HACG’ Non-Competitive Project-Basing Process MTW Activity:

¹¹ Columbus Commons’ completion is projected for the 2nd quarter of FYE2018

CE #1: Agency Cost Savings				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	Cost of task prior to implementation of the activity (in dollars).	Expected cost of task after implementation of the activity (in dollars).	Actual cost of task after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
Total cost of task in dollars (decrease).	TBD	TBD	TBD	TBD

CE #2: Staff Time Savings				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	Total amount of staff time dedicated to the task prior to implementation of the activity (in hours).	Expected amount of total staff time dedicated to the task after implementation of the activity (in hours).	Actual amount of total staff time dedicated to the task after implementation of the activity (in hours).	Whether the outcome meets or exceeds the benchmark.
Total time to complete the task in staff hours (decrease).	TBD	TBD	TBD	TBD

This activity is off schedule since HACG anticipated using the activity’s flexibilities at Columbus Commons, a redevelopment project of the site that held Booker T. Washington Homes. Additionally, HACG continues to devise the appropriate staff for inclusion in this activity’s metrics.

The approval year, FYE2016, was used to set “soft” baselines and corresponding benchmarks for the activity since the activity approval took place during the second quarter of HACG’s fiscal year. Additionally, construction of Columbus Commons met delays during FYE2016 and was not completed by June 30, 2017. Because of a late approval and more importantly, a later construction completion date (now during the second quarter of FYE2018), HACG will use FYE2018 to set baselines and corresponding benchmarks for the remainder of the activity’s demonstration period.

Annual Benchmark						
Unit of Measurement	Baseline FY2016	FY2017	FY2018	FY2019	FY2020	FY2021
Total cost of task in dollars (decrease).	TBD	TBD	TBD	TBD	TBD	TBD
Total time to complete the task in staff hours (decrease).	TBD	TBD	TBD	TBD	TBD	TBD

HACG moved from Emphasys as its client tracking software to YARDI during FYE2016. HACG staff is still learning the full capabilities of YARDI. HACG staff continues to manually collect data from both systems to provide as accurate a picture as possible for Planning and Reporting purposes.

B. Not Yet Implemented Activities

Activity **2016.01 – Next Step Vouchers** was introduced and **approved in HACG’s FY2016 Annual MTW Plan** and not implemented during the same fiscal year as approval.

The implementation of this activity is contingent upon properly received referrals from the Division of Family and Children Services (**DFCS**). Although DFCS and HACG have a current, valid Memorandum of Understanding/Agreement (**MOU/A**) between the Agencies to refer and house, respectively, foster youth that have aged out of foster care, DFCS did not refer any foster youth before June 30, 2017.

It is HACG’s understanding that DFCS will exhaust an existing state program before it refers foster youth to HACG. DFCS anticipates referring aged out foster youth to HACG during the first quarter of HACG’s FYE2018.

Activity **2016.03 – Project-Basing Flexibilities** was introduced and **approved in HACG’s FY2016 Annual MTW Plan** and not implemented during the same fiscal year as approval.

The implementation of this activity is contingent upon completion of Columbus Commons, a redevelopment project on the same site that Booker T. Washington Homes was located. Revised plans project a completion date during the second quarter of FYE2018. Columbus Commons is a 106-unit mixed-finance site with 15 market units and 91 subsidized units.

Once this project is complete, HACG anticipates exercising the flexibilities under this activity to project-base more units than the 25% building cap (50% under RAD) during FYE2018 or later. Additionally, the activity waives the mandatory, supportive services participation requirement for families living in the units above the 25%/50% building cap.

C. Activities on Hold

Activity **2014.05 – Streamline Housing Quality Standards (HQS)** was introduced and **approved in HACG’s FY2014 Annual MTW Plan** and implemented during the same fiscal year as approval. HACG stopped implementation of this activity in FYE2017.

HACG placed this activity on hold because of PIH Notice 2016-05. HACG wants to evaluate the streamlining regulations and compare them to the activity more closely. First blush, HACG anticipates implementing Attachment K and L of PIH Notice 2016-05, but expresses concerns on its ability to continue inspecting its own units as afforded by this activity.

HACG anticipates making a final decision to reactivate or continue the close-out process of this activity during FYE2018.

Activity **2015.01 – Eliminate Child Support from Income Calculation** was introduced and **approved in HACG’s FY2015 Annual MTW Plan** and implemented during the same fiscal year as approval. HACG stopped implementation of this activity in FYE2017.

HACG placed this activity on hold because of its portfolio award to convert its PH units to Section 8 assisted PBV units under the RAD Program and its election to use LIHTC funding to meet Ga DCA and RAD requirements. Because HACG is using LIHTC funding, all household income must be calculated. An elimination of income contradicts the requirements of the LIHTC funding program.

HACG anticipates making a final decision to reactivate or continue the close-out process of this activity during FYE2018.

D. Closed-Out Activities

HAG does not have any closed-out activities.

SECTION V – Sources and Uses of Funds

A. MTW Report: Sources and Uses of MTW Funds
Actual Sources and Uses of MTW Funding for the Fiscal Year
<div style="border: 1px solid black; padding: 5px; margin: 5px 0;"> <p>PHAs shall submit their unaudited and audited information in the prescribed FDS format through the Financial Assessment System - PHA (FASPHA), or its successor system</p> </div>
Describe the Activities that Used Only MTW Single Fund Flexibility
<div style="border: 1px solid black; padding: 10px; background-color: #FFFF00; margin: 5px 0;"> <p>None of HACG's HUD-approved, implemented MTW Activities used only MTW single-fund flexibility during FYE2017 (July 1, 2016 through June 30, 2017)</p> </div>

B. MTW Report: Local Asset Management Plan
<p>Has the PHA allocated costs within statute during the plan year? <input style="width: 40px; height: 20px; text-align: center; color: blue;" type="text" value="Yes"/> <input style="width: 40px; height: 20px;" type="text"/></p> <p>Has the PHA implemented a local asset management plan (LAMP)? <input style="width: 40px; height: 20px;" type="text"/> or <input style="width: 40px; height: 20px; text-align: center; color: blue;" type="text" value="No"/></p> <p>If the PHA is implementing a LAMP, it shall be described in an appendix every year beginning with the year it is proposed and approved. It shall explain the deviations from existing HUD requirements and should be updated if any changes are made to the LAMP.</p> <p>Has the PHA provided a LAMP in the appendix? <input style="width: 40px; height: 20px;" type="text"/> or <input style="width: 40px; height: 20px; text-align: center; color: blue;" type="text" value="No"/></p>
<div style="border: 1px solid black; padding: 10px; background-color: #FFFF00; margin: 5px 0;"> <p>N/A</p> </div>

C. MTW Report: Commitment of Unspent Funds

In the table below, provide planned commitments or obligations of unspent MTW funds at the end of the PHA's fiscal year.

Account	Planned Expenditure	Obligated Funds	Committed Funds
N/A	N/A	\$ -	\$ -
N/A	N/A	-	-
N/A	N/A	-	-
N/A	N/A	-	-
N/A	N/A	-	-
N/A	N/A	-	-
N/A	N/A	-	-
N/A	N/A	-	-
Total Obligated or Committed Funds:		0	0

Section is not applicable to MTW PHAs

Note: Written notice of a definition of MTW reserves will be forthcoming. Until HUD issues a methodology for defining reserves, including a definition of obligations and commitments, MTW agencies are not required to complete this section.

SECTION VI – **Administrative**

A. HUD Reviews, Audits, or Physical Inspection Issues

HACG did have any HUD reviews, audits, nor physical inspection issues that required action by HACG to address the issue.

B. PHA-Directed Evaluations

Columbus State University (**CSU**) is contracted to evaluate the following activities:

- 2014.01 – Community Choice
- 2014.02 – Innovations to Reduce Homelessness
- 2014.06 – Rent Reform (Farley)
- 2016.01 – Next Step Vouchers (activity on hold; no referrals from DFCS)

CSU's report is attached for review, please see Attachment A.

C. Meeting Statutory Requirement Certification

HACG's certifies that it has met the three statutory requirements of:

- 1) assuring that at least 75% of the families assisted by the Agency are very low-income families;
- 2) continuing to assist substantially the same total number of eligible low-income families as would have been served had the amounts not been combined; and
- 3) maintaining a comparable mix of families (by family sized) are served, as would have been provided had the amounts not been used under the demonstration

The certification is attached for review, please see Attachment B.

ATTACHMENTS

Excerpts of . . .

Moving to Work

Year 3

Prepared by:

Columbus State University

Dr. Joy Thomas

Dr. Brad Huff

Dr. Camille Bryant

Mr. Milton Love

Ms. Elijah Justice

(Full report available from CSU, condensed for space)

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Project Description

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Conclusions (Health include, others TBA)

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Executive Summary

The *Moving to Work* Demonstration conducted by the Housing Authority of Columbus, Georgia had three distinct evaluation components. The study examines whether or not voucher families take advantage of moving into areas of lower poverty. A total of three voucher groups are assessed. Participants are randomly assigned to groups. Groups consist of a 120% Fair Market Voucher Community Choice group, a 120% Fair Market Value low poverty group and a standard holding voucher control group. The purpose of, *Moving To Work: Community Choice* is to determine whether or not introducing voucher holder families into communities of higher income will improve outcomes for voucher families.

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Analytical Thoughts

The analysis does not suggest a strong correlation between a selection of amenity, job, and educational spatial variables and relocation decisions. However, not much of value can be said analytically about such a small data set. There could, for example, be correlations that simply do not rise to significance in such a small set of data. There could be variables that are far more important than the ones selected for analysis.

There is one speculative consideration I would like to raise. All of the vouchers under this program are Section 8 vouchers and as such recipients are restricted to using the vouchers in Section 8 approved housing. It may be that the most desirable Section 8 approved housing is in very limited supply and that an open unit drives relocation decisions far more than the proximity of the open unit to amenities, jobs, or school districts. This line of inquiry might be a fruitful avenue for future research.

Conclusions

Limitations: It has been published in various forum that the SF-12v2 should potentially use qualitative methodology to collect the data, especially in populations with low or limited literacy (Larson, 2002). In this sample there was only one male participant. This limits the ability to compare gender.

Discussion: Health status indicators derived from self-report have been shown to be useful in a variety of settings for the purpose of assessing and monitoring the functional health of an individual or population (Larson, 2002). This information can be used by medical practitioners, clinical researchers, and policymakers to identify health needs to improve decision-making, resource utilization, and health status. More research should be considered to analyze comfort in self-report data as it relates to health and ability, especially in populations who may receive disability disbursement or subsidized health care. There may be reluctance to divulge information (Radosevich et al., 1997).



*The Housing
Authority of
Columbus, Georgia*

Attachment B

CERTIFICATION OF STATUTORY COMPLIANCE

On behalf of the Housing Authority of Columbus, Georgia (HACG), I certify that the agency has met the three statutory requirements of the Amended and Restated Moving-to-Work Agreement between the US Department of Housing and Urban Development (HUD) and HACG (effective July 3, 2013).

During FYE 2017, HACG has adhered to the following requirements:

- At least 75% of the families assisted by HACG are very low-income families;
- HACG has continued to assist substantially the same total number of eligible low-income families as would have been served had the amounts not been combined;
- HACG has maintained a comparable mix of families (by family size) served, as would have been provided had the amounts not been used under the demonstration

J. LEN WILLIAMS
Chief Executive Officer

09/20/17
DATE

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West Point, Georgia



Form 50900: Elements for the Annual MTW Plan and Annual MTW Report

Attachment B

Certifications of Compliance

Annual Moving to Work Plan Certifications of Compliance

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

Certifications of Compliance with Regulations:

Board Resolution to Accompany the Annual Moving to Work Plan*

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairman or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the Annual Moving to Work Plan for the PHA fiscal year beginning **July 1, 2017**, hereinafter referred to as "the Plan", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:

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

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

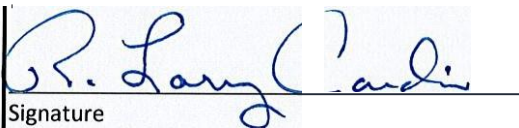
The Housing Authority of Columbus, Georgia
PHA Name

GA004
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

HACG Board of Commissioners Chair
Title


Signature

April 12, 2017
Date

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