



FY 2024 ANNUAL MTW PLAN



Housing Authority of Columbus, Georgia

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HUD Approval: Pending

ANNUAL MTW PLAN SUBMITTED BY:

The Housing Authority of Columbus, Georgia

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Mr. John Casteel, Chief Assisted Housing Officer
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Ms. Carla Godwin, MTW and Resident Services Administrator

Glossary of Abbreviations and Acronyms

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

Glossary of Abbreviations and Acronyms - continued

HfG	Home for Good
HQS	Housing Quality Standards
HUD	US Department of Housing and Urban Development
IRS	Internal Revenue Service (<i>US Department of Treasury</i>)
ITSP	Individual Training and Service Plan (<i>element under the FSS Program</i>)
LAMP	Local Asset Management Plan
LIHTC	Low-Income Housing Tax Credit (<i>disbursed by GA DCA</i>)
LURA	Land Use Restrictive Agreement
LURC	Land Use Restrictive Covenants
MOA/U	Memorandum of Agreement/Understanding
MTW	Moving-to-Work Demonstration Program (<i>allows fungibility and flexibility</i>)
NNC	Neighborhood Network Center (<i>computer lab or learning lab</i>)
NSV	Next Step Voucher
PBCA	Performance-Based Contract Administrator
PBRA	Project-Based Rental Assistance
PBV	Project-Based Voucher
PCA/PNA	Physical Condition Assessment/Physical Needs Assessment
PH	Public Housing
PHA	Public Housing Agency/Assistance Authority
PIC	Public and Indian Housing Inventory Management System (<i>formerly known as Public and Indian Housing Information Center</i>)
PIH	Public and Indian Housing
PUC	Per Unit Cost
QAP	Qualified Allocation Plan (<i>guidelines established by DCA for LIHTC funds</i>)
RAB	Resident Advisory Board
RAD	Rental Assistance Demonstration Program (<i>converts PH units to PBRA and PBV</i>)
RAD PBV	RAD Project-Based Voucher (<i>designation for former PH units/participants</i>)
ROSS	Resident Opportunities and Self-Sufficiency
RRV	Rapid Rehousing Voucher
SCV	Second Chance Vouchers
S8	Section Eight (<i>Housing Choice Voucher Rental Assistance Program</i>)

Glossary of Abbreviations and Acronyms - continued

SP	Section Nine (<i>Public Housing Rental Assistance Program</i>)
SEMAP	Section Eight Management Assessment Program
SRO	Single-Room Occupancy Program (<i>Moderate Rehabilitation Certificates</i>)
TBV	Tenant-Protection Voucher
TSO	Tenant Selection Office
TTP	Total Tenant Payment
UA	Utility Allowance
UGROW	Urban Garden Resources and Organic Wellness
URP	Utility Reimbursement Payment
UWCV	United Way of the Chattahoochee Valley
VASH	Veterans Affairs Supportive Housing Voucher Program
VAWA	Violence Against Women Act
VI-SPDAT	Vulnerability Index – Services Prioritization Decision Assistance Tool
VMS	Voucher Management System

I. INTRODUCTION

A. Table of Contents

I. Introduction	
a. Table of Content.....	vi
b. Overview.....	7
Short-Term Goals and Objectives.....	9
Long-Term Goals and Objectives.....	12
II. General Housing Authority Operating Information	
a. Housing Stock Information.....	13
b. Leasing Information.....	16
c. Wait List Information.....	17
III. Proposed MTW Activities: HUD Approval Requested	
a. Proposed MTW Activities.....	18
IV. Approved MTW Activities: HUD Approval Previously Granted	
a. Implemented Activities.....	22
b. Not Yet Implemented Activities.....	33
c. Activities on Hold.....	33
d. Closed Out Activities.....	33
V. Sources and Uses of MTW Funds	
a. MTW Plan: Sources and Uses of MTW Funds.....	34
b. MTW Plan: Local Asset Management Plan (LAMP).....	35
c. MTW Plan: Rental Assistance Demonstration Participation.....	35
VI. Administrative	
a. Board Resolution and Certifications of Compliances.....	36
b. Documentation of Public Process.....	36
c. Planned and Ongoing Evaluations.....	37
d. Lobbying Disclosures (SF-LLL) and (HUD-50071)	37
VII. Appendix Section	
a. Attachment A - Resolution Adopting the Annual MTW Plan and Certifications of Compliance.....	39
b. Attachment B – Public Process & Comments.....	42
c. Attachment C – Planned & Ongoing Evaluations.....	43
d. Attachment D – Forms (SF-LLL) and (HUD-50071)	44

B. Overview

The Housing Authority of Columbus, Georgia (HACG) was created in 1938 and is a public body, both corporate and politic, governed by a seven-member Board of Commissioners appointed to terms by the Mayor of the Columbus Consolidated Government. HACG is located on the west-central part of the State of Georgia in Muscogee County, approximately 90 minutes southwest of Atlanta. Columbus is home to the U.S. Army Fort Moore and The Maneuver Center of Excellence, has the longest urban whitewater course in the world (2.5 miles) that runs along a 15-mile Riverwalk, and a zipline across the Chattahoochee River. Columbus, Georgia, founded in 1828, is a great example of a true river city, once a major center for textile manufacturing and now has become the place for culture, commerce, outdoor adventure, and a great place for meetings from 10 to 10,000. The city has transformed the downtown with restaurants, retail, luxury apartments and hotels. Also known for the vibrant arts and entertainment district in walking distance to meeting facilities and accommodations. The historic elements of Columbus remain while it possesses all the aspects of a modern city. The small-town feel is kept intact despite being Georgia's third largest city with a population over 200,000.

HACG's Mission Statement:

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



HACG is proud to be designated as 1 of the initial 39 MTW agencies. There are currently 80 housing authorities in the MTW program. HACG was designated as an MTW agency in December 2012 and entered a 5-year MTW Agreement with the US Department of Housing and Urban Development (HUD), effective July 2, 2013. On April 14, 2016, the agreement was extended to the end of HACG's fiscal year 2028. HACG signed the Third Amendment to the Standard MTW Agreement on March 25, 2020. The MTW designation has propelled HACG to accomplish its mission by allowing for redevelopment and RAD conversion. HACG actively supports and encourages other PHAs to participate in the MTW Expansion efforts.

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

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

administrative services for three small housing authorities located within a 50-mile radius of Columbus, Georgia. These small authorities each have fewer than 80 dwelling units.

MTW is a national demonstration program authorized by Congress which gives HACG the flexibility to waive certain statutes and HUD regulations pertaining to both housing assistance programs (housing choice vouchers and public housing). The MTW Program provides HACG opportunities to utilize the use of Federal dollars more efficiently, help residents find employment and become self-sufficient, and increase housing choices for low-income families by introducing new innovative ideas to HUD that address at least one of the following three **MTW statutory objectives**:

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

HACG MTW activities are all designed to promote one or more of the MTW statutory objectives. HACG believes its MTW designation is the result of many years of laying the foundation for innovation at HACG and through the successful management of its housing assistance programs, as well as being an industry innovator. The MTW activities allow HACG to learn if the introduced idea has a positive or negative impact to the agency and/or to its residents.

HACG provides this document for public inspection/review for all interested parties to share their thoughts and comments. The annual document was available for review and comment from July 28, 2023 through August 27, 2023, at the following locations:

- ◆ The Columbus Public Library, 3000 Macon Road (2nd floor reference desk);
- ◆ HACG's Administrative Offices
 - Central Office, 1000 Wynnton Road (front desk);
 - Tenant Selection Office, 1146 Martin Luther King Jr. Boulevard (front desk)
 - Site Rental Offices, various addresses citywide (front desk)
- ◆ HACG's Facebook: <https://www.facebook.com/The-Housing-Authority-of-Columbus-Georgia-110059770673833>
- ◆ HACG Website: <http://www.columbushousing.org>

In addition to the above means to comment on this document, HACG also held Public Hearings to receive comments on the FY 2023 Annual MTW Plan on the following dates and locations:

- ◆ August 22, 2023, via Zoom or In-Person, at 11:00 a.m., Dial 1-646-876-9923 or <https://us06web.zoom.us/j/84964708196> Meeting ID: 849 6470 8196 to join the meeting
- ◆ August 22, 2023, via Zoom or In-Person at 2:00 p.m., Dial 1-646-876-9923 or <https://us06web.zoom.us/j/83904701983> Meeting ID: 839 0470 1983 to join the meeting

All comments received prior to August 28, 2023, will be incorporated into the FY 2024 Adopted Annual MTW Plan. During fiscal year 2024 (January through December 31, 2024), HACG seeks to implement actionable techniques and appropriate strategies to meet stated management goals and objectives listed in its plan.

2023 MTW SHORT-TERM GOALS AND OBJECTIVES

- ◆ Maximize use of MTW block-grant with full flexibility
 - Combine all PH operating subsidies, Section 8 HAP funds and capital funds
 - Use combined funds to meet HACG’s Strategic Plan goals and MTW Statutory Objectives

- ◆ Collect and analyze data on Approved MTW Activities for external and internal purposes
 - Monitor and track MTW data to complete plans, reports, and surveys
 - Strengthen MTW Activity reviews and recommendations for non-compliant issues
 - Cross reference HUD-approved MTW Activities with published guidance documents to ensure approved MTW Authorizations are relevant and necessary

APPROVED MTW ACTIVITIES

Activity 2014.02	Innovations to Reduce Homelessness - 150 TBVs for chronically homeless families - MTW Authorization: D.2.a, D.2.b, D.2.c, D.4
Activity 2014.03	Administrative Reforms - Sets asset threshold at \$50k and sets income cap at 50% - MTW Authorization: D.3.a, D.3.b
Activity 2014.04	Administrative Efficiency - Places eligible families on triennial re-certification cycle - MTW Authorizations: D.1.c
Activity 2015.02	Portability Restrictions - Limits ports in and out of HACG to employment related reasons - MTW Authorizations: D.1.g
Activity 2015.03	Simplify Utility Allowance Calculation - Creates 3 UA schedules based on rental assistance program - MTW Authorizations: D.2.a
Activity 2015.04	Cap Childcare Deductions - Denies childcare deductions that exceed GA CAPS maximum - MTW Authorizations: C.11, D.2.a
Activity 2016.01	Next Step Vouchers - 10 TBVs for youth aging out of Foster Care MTW Authorization: D.2.d, D.3.a, D.3.b, D.4

- Activity 2016.02** **Non-Competitive Project-Basing Process** - Allows HACG to project-base assistance without competition - MTW Authorization: D.7.a
- Activity 2016.03** **Project-Basing Flexibilities** - Exceed project-base caps, determine rent reasonableness, certify HQS on HACG units - MTW Authorization: D.1.e, D.2.c, D.5
- Activity 2018.01** **Eliminate/Reduce Interim Certification Examinations** - No interims for Contribution Income only families, 1 interim for all other families - MTW Authorization: C.11
- Activity 2018.02** **Site Based Housing Flexibility** - Allows HACG to over-house smaller families in larger units at all non-Public Housing site-based housing and all future TPV's. Allows HACG to provide gap payment assistance, up to the FMR, to the landlord on behalf of the over-housed family – MTW Authorization: D.1.b, D.2.b
- Activity 2019.01** **Minimum Rent Increase/Utility Reimbursement Payments (URPs) Decrease** - Increases the minimum rent to \$150 over 2 years, Eliminates processing URPs over 2-year period – MTW Authorizations: C.11, D.2.a
- Activity 2020.01** **Sponsor-Based Emergency Voucher Program** - 24 TBVs for emergency housing for flooding, fire, natural disasters, and condemned housing – MTW Authorization: Attachment D of MTW Agreement "Use of MTW Funds"
- Activity 2023.01** **Second Chance Vouchers** – 10 Flat Rate Subsidy Vouchers for housing returning citizens who are actively engaged in services and programs in the community – MTW Authorizations: Attachment D of MTW Agreement “Use of MTW Funds”

HACG CLOSED MTW ACTIVITIES

- Activity 2014.01** **Community Choice** – MTW Authorizations: D.2.a, D.2.b – Approved in 2015, Implemented in 2015, and Closed in 2019
- Activity 2014.05** **Streamline HQS Inspections** – (Moved to 2016.03) - MTW Authorizations: D.5 (moved to 2016.03) – Approved in 2014, Implemented in 2015, and Closed in 2017
- Activity 2014.06** **Rent Reform (Farley)** – MTW Authorizations: C.4, C.11 – Approved in 2014, Implemented in 2014, and Closed in 2018

Activity 2015.01 Eliminate Child Support Income from Rent Calculation – MTW Authorizations:
C.11 – Approved in 2015, Implemented in 2015, and Closed in 2017

2024 NON-MTW SHORT-TERM GOALS AND OBJECTIVES

HACG worked with KB Advisory Group of Atlanta, Georgia as consultants to assist with the modernization of Warren William-Rivers Homes and for the development of the BTW South properties. The team worked with HACG to determine the project goals and objectives, hold stakeholder interviews and public visioning workshops. The team also conducted a site and context analysis, market analysis, preliminary design concepts, evaluate financial sources and uses, and determine financial feasibility. HACG received the final reports and design concepts and is moving forward with these plans.

To complete the RAD/Section 18 Blend conversion of Warren Williams Homes (GA004000405), HACG submitted a 4% tax credit/private activity bonds application to DCA in October 2022, and selected for funding in March 2023, for the rehabilitation of these units. Final documents were submitted to DCA in July 2023 and are under review. HACG will also submit a RAD/ Section 18 Blend application to HUD to complete the conversion process. The total number of units will remain at 182 but it is unclear on the number of RAD units vs Section 18 units at this time. The outcome of the project will be the preservation through rehab and all residents will have the same rights.

HACG received a 9% Low-Income Housing Tax Credit (LIHTC) for the construction of BTW South in February 2023. This is the development of 90 units of elderly housing (62 years and older). The project is currently under design with construction expected to begin in Spring 2024.

HACG still plans to convert E. Canty Homes (GA004000408) to RAD once the Warren Williams project is complete. The conversion will be a straight conversion and/or disposition with only critical repairs completed.

HACG signed an agreement with In-Fill Housing, Inc., an affiliate of Macon Housing Authority as a General Partner in a Joint Venture to construct and manage a 72-unit elderly complex on Warm Springs Road, Columbus, GA. The new development, Warm Springs Senior Village, will consist of the new construction of 72 units of mixed income housing with 64 of those units being rented to low-income families whose incomes are at or below 60% AMI. HACG has awarded 50 regular project-based Section 8 vouchers to the project. The housing will be a mixture of project-based Section 8 voucher units (50 units at or below 50% AMI), Low-Income Housing Tax Credit (LIHTC) units (14 units at or below 60% AMI), and market rate units (8 units). The project will also provide supportive services including no cost preventative health care services to residents through a partnership with Valley Healthcare Systems. Residents will also have access to a Community Garden Program through a partnership with UGROW, Inc. and Columbus Botanical Gardens which will offer nutritional and gardening classes. The construction is expected to be completed in November 2023.

The following are HACG plans for additional use of MTW Single Fund Flexibility:

- Expand HACG’s affordable housing portfolio by acquisition of or development of affordable housing units
- Utilize MTW funds for extraordinary maintenance, enhanced security, and rehabilitation of HACG controlled existing affordable housing
- Strategically reduce debt at HACG controlled affordable housing in order to maintain financial viability
- Wireless Wi-Fi Infrastructure at all HACG developments
- Use MTW funds or charge the properties for Community Resource Coordinator

MTW LONG-TERM GOALS & OBJECTIVES

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

NON-MTW LONG-TERM GOALS & OBJECTIVES

The following are HACG plans for additional use of MTW Single Fund Flexibility:

- Expand HACG’s affordable housing portfolio by developing affordable housing units on HACG owned or acquired properties.

HACG currently owns approximately 20 acres of vacant land on Moon Road in Columbus, GA. HACG plans to develop mixed income senior and family housing at this site in 3 phases. We anticipate the first phase to begin in 2026.

BTW South is a 2 or 3 phased development concept which resulted from the research completed by HACG and KB Advisory Group in 2022. Phase 1 is currently under design, with the remaining phase or phases occurring in the future. The future phases will result in additional mixed income housing with a possible small commercial component.

(II.) GENERAL OPERATING INFORMATION

ANNUAL MTW PLAN

A. HOUSING STOCK INFORMATION

i. Planned New Public Housing Units

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

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

Total Public Housing Units to be Added in the Plan Year 0

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

If "Population Type" is "Other" please describe: N/A

ii. Planned Public Housing Units to be Removed

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

AMP NAME AND NUMBER	NUMBER OF UNITS TO BE REMOVED	EXPLANATION FOR REMOVAL
GA004000405 Warren Williams Homes	182	Public Housing (PH) units are planned to be removed from PH stock and converted to long-term Section 8 assisted Project-Based Voucher (PBV) units under the RAD/Section 18 Blend SAC Disposition Approval. It is unclear of number of RAD units & Section 18 units at this time. (There were 184 units; 2 units were approved for De Minimis demolition by HUD)
GA004000408 Elizabeth Canty	243	Public Housing (PH) units are planned to be removed from PH stock and converted to long-term Section 8 assisted Project-Based Voucher (PBV) units under the RAD Program and/or SAC Demolition Approval.

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

iii. Planned New Project Based Vouchers

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

PROPERTY NAME	NUMBER OF VOUCHERS TO BE PROJECT-BASED	RAD?	DESCRIPTION OF PROJECT
Canty Homes	243	Yes	RAD conversion, Demolition
Warren Williams Homes	182	Yes	RAD/Section 18 Blend conversion

425
 Planned Total Vouchers to be Newly Project-Based

iv. Planned Existing Project Based Vouchers

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

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	PLANNED STATUS AT END OF PLAN YEAR*	RAD?	DESCRIPTION OF PROJECT
(GA004000406) Luther Wilson	288	288	YES	RAD PBV Units
(GA004000410) E.E. Farley	102	102	YES	RAD PBV Units
(GA004000412) Brown Nicholson	100	100	YES	RAD PBV Units
(GA004000416) E.J. Knight - Senior	40	40	YES	RAD PBV Units
(GA004000417) E.J. Knight - Family	52	52	YES	RAD PBV Units
(GA004000418) Ashley Station – Phase I	73	73	YES	RAD PBV Units
(GA004000418) Ashley Station – Phase II	73	73	YES	RAD PBV Units
(GA004000420) Arbor Pointe I	93	93	YES/NO	18 RAD PBV Units, 75 HCV PBV Units
(GA004000421) Arbor Pointe II	93	93	YES/NO	18 RAD PBV Units, 75 HCV PBV Units
(GA004000422) Cottages @ Arbor Pointe	120	120	YES/NO	19 RAD PBV Units, 101 HCV PBV Units
(GA004000423) Patriot Pointe	95	95	YES/NO	24 RAD PBV Units, 71 HCV PBV Units
(GA004000424) Columbus Commons	91	60	YES/NO	31 RAD PBV Units, 60 HCV PBV Units
(GA004000630) Willow Glen	28	28	NO	HCV PBV Units
The Banks at Mill Village	76	76	NO	HCV PBV Units
Warm Springs Senior Village	50	50	NO	HCV PBV Units

1374
 Planned Total Existing Project-Based Vouchers

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

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

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

PLANNED OTHER CHANGES TO MTW HOUSING STOCK ANTICIPATED IN THE PLAN YEAR

HACG signed an agreement with In-Fill Housing, Inc., an affiliate of Macon Housing Authority as a General Partner in a Joint Venture to construct and manage a 72-unit elderly complex on Warm Springs Road, Columbus, GA. The new development, Warm Springs Senior Village, will consist of the new construction of 72 units of mixed income housing with 64 of those units being rented to low-income families whose incomes are at or below 60% AMI. HACG has awarded 50 regular project-based Section 8 vouchers to the project. The housing will be a mixture of project-based Section 8 voucher units (50 units at or below 50% AMI), Low-Income Housing Tax Credit (LIHTC) units (14 units at or below 60% AMI), and market rate units (8 units). The construction is expected to be completed in November 2023.

To complete the RAD/Section 18 Blend conversion of Warren Williams Homes (GA004000405), HACG submitted a 4% tax credit/private activity bonds application to DCA in October 2022, and selected for funding in March 2023, for the rehabilitation of these units. Final documents were submitted to DCA in July 2023 and are under review. HACG will also submit a RAD/ Section 18 Blend application to HUD to complete the conversion process. The total number of units will remain at 182 but it is unclear on the number of RAD units vs Section 18 units at this time.

HACG received a 9% Low-Income Housing Tax Credit (LIHTC) for the construction of BTW South in February 2023. This is the development of 90 units of elderly housing (62 years and older). The project is currently under design with construction expected to begin in Spring 2024. HACG has awarded 52 regular project-based Section 8 vouchers to the project.

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

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

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

GENERAL DESCRIPTION OF ALL PLANNED CAPITAL EXPENDITURES DURING THE PLAN YEAR

HACG’s Capital Fund (CFP) totals about \$2.8M, where the balance of the CFP total will be committed/obligated to RAD Projects II and III. Expenditures may include costs associated with the modernization of Williams and Canty necessary to rehabilitate the sites to meet RAD, Section 18 or RAD/Section 18 Blend requirements. Expenditure plans include Section 8 landlord payments, relocation and other expenditures related to converting PH units under RAD, Section 18 or RAD/Section 18 Blend and/or specialty consulting services, such as environmental testing, survey and legal work, code research, and other activities necessary to complete the RAD, Section 18 or RAD/Section 18 Blend portfolio conversion. Also, CFP planned expenditures may include physical improvements, enhanced security, management improvements, Agency-wide non-dwelling structures and equipment, administrative and operation fees, and costs, as well as preventative and routine maintenance to dwelling structures Agency-wide, minor pre- and post-construction costs for preliminary and completed project plans as well as GAP financing for new developments.

B. LEASING INFORMATION

i. Planned Number of Households Served

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

PLANNED NUMBER OF HOUSEHOLDS SERVED THROUGH:	PLANNED NUMBER OF UNIT MONTHS OCCUPIED/LEASED*	PLANNED NUMBER OF HOUSEHOLDS TO BE SERVED**
MTW Public Housing Units Leased	4640	387
MTW Housing Choice Vouchers (HCV) Utilized	41,040	3,420
Local, Non-Traditional: Tenant-Based^	0	0
Local, Non-Traditional: Property-Based^	0	0
Local, Non-Traditional: Homeownership^	0	0
Planned Total Households Served	45,680	3,807

- * “Planned Number of Unit Months Occupied/Leased” is the total number of months the MTW PHA plans to have leased/occupied in each category throughout the full Plan Year.
- ** “Planned Number of Households to be Served” is calculated by dividing the “Planned Number of Unit Months Occupied/Leased” by the number of months in the Plan Year.
- ^ In instances when a local, non-traditional program provides a certain subsidy level but does not specify a number of units/households to be served, the MTW PHA should estimate the number of households to be served.

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

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

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

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

HOUSING PROGRAM	DESCRIPTION OF ANTICIPATED LEASING ISSUES AND POSSIBLE SOLUTIONS
MTW Public Housing	Leasing issues due to staffing, not enough maintenance staff to quickly turn the units. Also, long lead time to receive supplies & services from vendors & contractors. Short-term solution for vacancy turnaround time will be to contract with an outside vendor for the necessary vacancy preparation. Also, HACG stopped leasing units at Warren Williams due to the RAD/Section 18 conversion and renovations as of June 2023 under the guidance of HUD.

MTW Housing Choice Voucher	The rental market has a shortage of housing stock related to the pandemic. Increased rents are making it more difficult to find affordable housing. Landlords' unwillingness to rent vacant units after the fallout of the pandemic. Repairs to units are taking longer due to shortage of material and supplies. Also, some landlords are selling property and no longer leasing. Short Term solution consist of: HACG has raised its payment standards to 110% and is granting extensions, as necessary. Hired two additional personnel to assist with decreasing the timeframe for the issuance and leasing of vouchers. Waitlist opened in February 2023. Long term solution consists of: Advertising for new landlords as well as offering landlord incentives.
Local, Non-Traditional	N/A

C. WAITING LIST INFORMATION

i. Waiting List Information Anticipated

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

WAITING LIST NAME	DESCRIPTION	NUMBER OF HOUSEHOLDS ON WAITING LIST	WAITING LIST OPEN, PARTIALLY OPEN OR CLOSED	PLANS TO OPEN THE WAITING LIST DURING THE PLAN YEAR
Federal MTW Housing Choice Vouchers	Community-wide	1500	Closed	No
MTW Rapid Rehousing Vouchers; MTW Next Step Vouchers	Program Specific	0	Partially Open	Yes
Federal MTW Public Housing Units; Converted PH Units to RAD Project-Based Vouchers	Merged	6370	Open	Yes

Please describe any duplication of applicants across waiting lists:

Applications for Public Housing may also be included on the RAD Community wide PBV Waitlist.

ii. Planned Changes to Waiting List in the Plan Year

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

WAITING LIST NAME	DESCRIPTION OF PLANNED CHANGES TO WAITING LIST
MTW HCV Wait List	MTW HCV Wait List may open temporarily in fiscal year (2024)
N/A	N/A

III. PROPOSED MTW ACTIVITIES: HUD APPROVAL REQUESTED

2016.03 Project-Basing Flexibilities (Re-Proposed)

A. Activity Description

i. Describe the Proposed Activity

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

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

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

HACG re-proposes this activity to also include Project Based Vouchers (PBV) units to "float" or change within a particular project when, for example, a new tenant needs a different size unit or when a current tenant no longer requires the subsidy but wants to remain in-place. Current regulations governing the program require an amendment to the Housing Assistance Payments (HAP) contract when changing specific units with a project. The ability to float the PBV subsidy to a vacant unit for the next program participant allows a quick turnover without the added cost and complexity of a contract amendment at every changeover.

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

This activity will continue to support the MTW statutory objective to increase housing choice for low-income individuals/families by exceeding the project-base cap and by allowing PBV units to "float" or change within a particular project. HACG will also continue to achieve cost efficiency through the ability to determine rent reasonableness and certifying HQS at HACG-owned properties. The anticipated impact of this activity are as follows:

- Eliminates the need for third-party contractors to determine rent reasonableness at HACG owned properties.
- Eliminates the need for third party contractors to certify HQS on HACG-owned units.
- Preserves affordable housing options for low-income families.
- Allows households to remain in place after their time limit rather than be displaced.

iii. Provide the Anticipated Schedule for Implementing the Proposed Activity

HACG anticipates the implementation of allowing PBV units to “float” beginning January 1, 2024.

B. Activity Metrics Information:

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

- CE #1: Agency Cost Savings
- CE #2: Staff Time Savings
- HC #4: Displacement Prevention

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

The overall and/or long-term benchmarks are as follow as of last MTW Annual Report in FY 2022:

<i>CE #1: Agency Cost Savings - Project Basing Flexibilities</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 (HCV/S8 HQS Inspections) in dollars	Number of HQS Inspections = 5032 Average time per HQS Inspection = 1.24 Average hourly compensation (salary + benefits) of HCV/S8 HQS Inspectors = \$23.70 Cost of Task <i>Prior to Implementation of the Activity:</i> \$ 147,885	Expected number of HQS Inspections = 3660 Expected average time per HQS Inspection = 1.80 Expected average hourly compensation (salary + benefits) of HCV/S8 HQS Inspectors = \$32.07 Expected Cost of Task <i>After Implementation of the Activity:</i> \$ 211,277	Actual number of HQS Inspections = 2802 Actual average time per HQS Inspection = 1.25 Actual average hourly compensation (salary + benefits) of HCV/S8 HQS Inspectors = \$29.90 Actual Cost of Task <i>After Implementation of the Activity:</i> \$ 104,725	Exceeds Benchmark

CE #2: Staff Time Savings - Project-Basing Flexibilities

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 task (HCV/S8 HQS inspections) in staff hours	Number of HQS Inspections = 5032 Average time per HQS Inspection = 1.24 Total Staff Hours Dedicated to the Task Prior to Implementation of the Activity: 6239.7	Expected number of HQS Inspections = 3660 Expected average time per HQS Inspection = 1.80 Expected Total Staff Hours Dedicated to the Task After Implementation of the Activity: 6588.0	Actual number of HQS Inspections = 2802 Actual average time per HQS Inspection = 1.25 Actual Total Staff Hours Dedicated to the Task After Implementation of the Activity: 3502.5	Exceeds Benchmark

HC #4: Displacement Prevention - Project-Based Flexibilities

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households at or below 80% AMI that would lose assistance or need to move (decrease). If units reach a specific type of household, give that type in this box.	Households losing assistance/moving prior to implementation of the activity (number).	Expected households losing assistance/moving after implementation of the activity (number).	Actual households losing assistance/moving after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
	2260	926	1178	Exceeds Benchmark

PROJECT-BASING FLEXIBILITIES ANNUAL BENCHMARK

Unit of Measurement	Baseline	2019	2020	2021	2022	2023
Total cost of task (HCV/S8 HQS Inspections) in dollars	\$ 147,885	\$ 188,456	\$ 203,372	\$ 196,278	\$ 211,277	\$ 166,828
Total time to complete task (HCV/S8 HQS inspections) in staff hours	6239.7	6219.7	6588.0	6239.0	6588.0	5050.8
Number of households at or below 80% AMI that would lose assistance or need to move (decrease).	2260	1808	1446	1157	926	741

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

HACG will use data collected from Yardi housing software.

C. Cost Implication

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

HACG does not anticipate any cost implications for this activity.

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

HACG does not anticipate any cost implications for this activity.

D. Need/Justification for MTW Flexibility

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

MTW Authorizations D.1.e, D.2.c, D.2.d, D.4, D.5, and D.7

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

MTW Authorizations D.1.e allows HACG to exceed the project-based cap at existing multi-family sites and it eliminates, for families living in the excepted units (above the cap).

HACG needs MTW Authorization D.2.c and D.5 to continue its ability to modify 24 CFR 982.507 and 24 CFR 982 Subpart I to be able to continue to determine rent reasonableness and conduct HQS certifications and eliminate the need for third-party contractors, program-wide, at and on HACG-owned (direct and indirect) properties and units.

With the re-proposed activity, HACG intends to use MTW Authorizations D.2.d, D.4 and D.7 to waive provisions under 24 CFR 983.203(c), “Information needed to identify the specific contract units in each building. The information must include the number of contract units in the building, the location of each contract unit, the area of each contract unit, and the number of bedrooms and bathrooms in each contract unit”.

E. Additional Information for Rent Reform Activities:

This activity does not meet the rent reform definition.

IV. APPROVED MTW ACTIVITIES

A. Implemented MTW Activities

Activity 2014.02	Innovations to Reduce Homelessness - MTW Authorization: D.2.a, D.2.b, D.2.c, D.4 – Approved: 2014 – Implemented: 2014 – Amended: 2020
Activity 2014.03	Administrative Reforms - MTW Authorization: D.3.a, D.3.b – Approved: 2014 – Implemented: 2014 – Amended: N/A
Activity 2014.04	Administrative Efficiency - MTW Authorizations: D.1.c – Approved: 2014 – Implemented: 2014 – Amended: N/A
Activity 2015.02	Portability Restrictions - MTW Authorizations: D.1.g – Approved: 2015 – Implemented: 2016 – Amended: N/A
Activity 2015.03	Simplify Utility Allowance Calculation - MTW Authorizations: D.2.a – Approved: 2015 – Implemented: 2015/2016 – Amended: N/A
Activity 2015.04	Cap Childcare Deductions - MTW Authorizations: C.11, D.2.a – Approved: 2015 – Implemented: 2015 – Amended: N/A
Activity 2016.01	Next Step Vouchers - MTW Authorization: D.2.d, D.3.a, D.3.b, D.4 – Approved: 2016 – Implemented: 2018 – Amended: N/A
Activity 2016.02	Non-Competitive Project-Basing Process - MTW Authorization: D.7.a – Approved: 2016 – Implemented: 2018 – Amended: N/A
Activity 2016.03	Project-Basing Flexibilities - MTW Authorization: D.1.e, D.2.c, D.5 – Approved: 2016 – Implemented: 2018 – Amended: 2019 – Re-Proposing: 2024
Activity 2018.01	Eliminate/Re-duce Interim Certification Examinations - MTW Authorization: C.11 – Approved: 2018 – Implemented: 2019 – Amended: N/A
Activity 2018.02	Site Based Housing Flexibility - MTW Authorization: D.1.b, D.2.b – Approved: 2018 – Implemented 2019 – Amended: 2019, 2020, and 2021
Activity 2019.01	Minimum Rent Increase/Utility Reimbursement Payments (URPs) Decrease - MTW Authorizations: C.11, D.2.a – Approved: 2019 – Implemented: 2019 – Amended: 2019

Activity 2020.01 **Sponsor-Based Emergency Voucher Program** - MTW Authorization: Attachment D of MTW Agreement "Use of MTW Funds" – Approved: 2020 – Implemented: 2020 – Amended: N/A

2014.02 Innovations to Reduce Homelessness

This activity currently sets aside 150 tenant-based vouchers (TBVs) that link permanent supportive housing to supportive services for chronically homeless families as a top preference. Secondary preference is homeless individuals or individuals who are living in a place not meant for human habitation or in an emergency shelter, in transitional housing, or are exiting an institution where they temporarily resided up to 90 days. The activity includes a tiered rent schedule, minimum rent waiver and selection preference to the targeted group. Also, HACG is interested to learn if housing stability positively impacts household income, earned income and other socio-economic categories.

Order of preference:

1. Chronically homeless veterans
2. Chronically homeless individuals
3. Homeless veterans
4. Homeless individuals

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

Employment incentives for veterans include:

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

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

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

HACG plans to reduce the number of TBVs available from 150 to 100 effective July 1, 2022. Currently there are an average of 75 leased; therefore, the need for this type of voucher has decreased. HACG anticipates the following for the Innovations to Reduce Homelessness Activity in FYE 2024:

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

2014.03 Administrative Reforms (HCV Only)

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

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

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

HACG anticipates the following for the Administrative Reforms Activity in FYE 2024:

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

2014.04 Administrative Efficiencies (HCV Only)

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

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

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

HACG anticipates the following for the Administrative Efficiencies Activity in FYE 2024:

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

2015.02 Portability Restrictions

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

Verifiable employment may include the following:

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

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

Hardship requests are reviewed on a case-by-case basis in accordance with HACG’s Hardship Policy. HACG will grant ports in cases of Violence Against Women Act (VAWA) and to meet reasonable accommodations. HACG anticipates the following for the Portability Restrictions Activity in FYE 2024:

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

2015.03 Simplify Utility Allowance Calculation

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

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

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

HACG anticipates the following for the Simplify Utility Allowance Calculation Activity in FYE 2024:

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

2015.04 Cap Childcare Deduction

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

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

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

HACG anticipates the following for the Cap Childcare Dependent Deduction Activity in FYE 2024:

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

2016.01 Next Step Vouchers

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

The following are requirements of the participants:

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

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

HACG anticipates the following for the Next Step Vouchers (NSV) Activity in FYE 2024:

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

2016.02 Non-Competitive Project-Basing Process

This activity modifies applicable rules and regulations as necessary to project-base Section 8 rental assistance at HACG owned (direct & indirect ownership) properties without competition. HACG will also use this activity for newly constructed housing and substantially rehabilitated properties to receive subsidy.

HACG anticipates the following for the Non-Competitive Project-Basing Process Activity in FYE 2024:

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

2016.03 Project-Basing Flexibilities

This activity includes significant changes and is being re-proposed under Section III. Proposed MTW Activities

2018.01 Eliminate/Reduce Interim Certification Examinations

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

To accomplish this activity, HACG has implemented the following:

- ◆ Eliminated interim certification examinations on Contribution Income
- ◆ Program participants that report contribution income cannot report a loss of contribution income for 12 months
- ◆ Limited program participants to 1 interim certification examination annually for all other income related adjustments (after 90 days or before 90 days of annual re-certification)

In March 2020, Centers for Disease Control and Prevention (CDC) responded to a pandemic of respiratory disease spreading from person-to-person caused by a new coronavirus which they named Coronavirus Disease 2019 (COVID-19) This situation poses a serious public health risk. The federal, state, and local governments encouraged people to stay home and away from large gatherings of 10 or more. Several businesses took precautions and closed for two weeks and possibly longer in order to lessen the spread of the disease, which results in many of our residents without work. As of January 2021, COVID-19 still poses a serious risk to public health and continues to impact the employment.

HACG updated the Hardship Case Criteria to include language regarding any health/economic hardships associated with COVID-19, see item D. below. HACG continues to address hardship requests on a case-by-case basis according to the Hardship Policy.

HARDSHIP CASE CRITERIA

HACG will consider extenuating circumstances on a case-by-case basis in which households reporting Contribution Income may be exempted or temporarily waived from these new rent determination rules that include the following:

- A. HACG will consider temporarily waiving requirements from these new rent determination rules for program participants when program participants citing Contribution Income as their sole source of income produce evidence that the Contribution Income provider is medically incapacitated. The family's contributor's incapacities must be for an extended period (30+ consecutive days) that directly impacts the contributor's ability to maintain agreed upon monthly contribution. The loss of such a contribution must directly impact a family's independent living needs, such as shelter, food, utilities, and/or similar expenses.

HACG reserves the right to analyze the impact of the contribution to social service benefits, subsidy level, and other circumstances in its calculation to determine length of time and/or reduction in family's fair share of rent.

- B. HACG will consider exemption of requirements from these new rent determination rules for program participants when program participants citing Contribution Income as their sole source of income produce evidence that the Contribution Income provider is deceased. The family has 15 days from contributors passing to provide HACG with the proper documents. HACG will consider retroactive changes when proper documentation within the timeframe is provided. When a family provides the documentation after 15 days, the family remains responsible for their fair share of the rent until changes are made. HACG will make rent changes effective within the standard 30-day timeframe.

HACG reserves the right to analyze the impact of the contribution to social service benefits, subsidy level, and other circumstances in its calculation to determine the length of time and/or reduction in the family's fair share of rent.

- C. HACG will not consider hardship cases under this activity when other income sources are included in the rent calculation as a result of the eligibility interview/certification process.
- D. HACG will consider temporarily waiving requirements from the rent determination rules for program participants experiencing a reduction in income or work hours as a result of any health/economic hardships associated with COVID-19.

HACG anticipates the following for the Eliminate/Reduce Interim Certification Examinations Activity in FYE 2024:

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

2018.02 Site-Based Housing Flexibility

This activity allows HACG to over-house eligible, qualified low-income families at all non-Public Housing site-based housing developments as well as Tenant Protection Vouchers (TPV) awarded to HACG for Ralston Towers residents and provide rental payment assistance for over-housed families to the landlord for the difference between assigned unit size and the eligible family's income means and/or voucher amount up to 120% of the Fair Market Rent (FMR) of the assigned bedroom unit at defined sites until an appropriate sized family becomes available to occupy that assisted unit.

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

For all non-Public Housing site-based housing developments once an appropriately sized family and right-size unit becomes available that meets the accommodation needs of the incumbent family, HACG will issue a 30-day notice in accordance with the “transfer form” for the incumbent family to move/transfer to the appropriate unit. The Ralston Towers TPV holders are permitted to remain in their relocated unit for the duration of their voucher or until they move out of their unit to a new unit.

HACG amended this activity in FY 2021 to include all future TPV’s to be eligible up to one size larger and provide the rental payment assistance for the families to the landlord for the difference between the assigned unit size and the eligible family’s income means and/or voucher amount up to 120% of the Fair Market Rent (FMR) of the assigned bedroom unit.

HACG anticipates the following for the Site-Based Housing Flexibility Activity in FYE 2024:

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

2019.01 Eliminate/Reduce Utility Reimbursement Payments (URPs)

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

Under this activity, HACG will increase the minimum rent to \$150 to eliminate URPs (or at the least significantly reduce the number of URPs processed) over the next two years. The increase in minimum rent across all rental assistance programs significantly reduces negative rent situations that require an URP check.

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

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

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

HACG anticipates the following for the Eliminate/Reduce Utility Reimbursement Payments (URPs) Activity in FYE 2024:

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

2020.01 Sponsor-Based Emergency Voucher Program (EVP)

This activity sets aside 24 TBV's for Emergency Housing for families affected by local natural disasters, fire, flooding or notice to condemn property prompted by local government action in Muscogee County. The TBV's is limited to a 6-month period which allows the individual or families to process insurance claims, contract family members and stabilize their finances. This activity is not intended to assist individual single families housing displaced by natural disasters but rather families residing in multifamily developments where six or more units are affected by natural disasters, fire, flooding, or government condemned properties. HACG offers a top preference for eligible families on our waiting list that experience these types of emergencies. However, all the families receiving these temporary emergency vouchers are currently not in HACG assisted housing.

HACG will issue a flat-rate subsidy of \$600 per month per family to the Sponsor-Based Partner. HACG entered into a partnership agreement with Home for Good (HfG) on January 27, 2020. When emergency occurs, HfG will contact HACG to arrange for emergency housing provided with the EVP MTW Activity. To expediate the move-in-process, the family will have 30 days to income qualify. HfG will provide basic HQS inspections on the selected housing before moving in.

HACG anticipates the following for the Sponsor-Based Emergency Voucher Program (EVP) Activity in FYE 2024:

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

2023.01 – Second Chance Vouchers

This activity allows HACG to set-aside 10 sponsor-based vouchers with funding based on a one-bedroom payment standard for assistance in housing returning citizens who are actively engaged in services and programs in the community aimed at reducing recidivism and increasing economic and social upward mobility. HACG will also follow the terms of PIH Notice 2011-45.

HACG signed an agreement with United Way of the Chattahoochee Valley (UWCV) for the vouchers. UWCV will obtain access and referral through their partnership with the Mayor's Commission on Re-Entry Sub Committee in collaboration with the Continuum of Care Coordinated Entry system.

The Second Chance Vouchers (SCV) are based on low-income limits and have a lease term expiration of two years with the waiver of no re-examination. The voucher will have a flat rate subsidy of up to the current one-bedroom FMR per month to be paid to UWCV. UWCV will in turn apply the funding to participants rent and/or utilities each month. By creating a partnership with UWCV and providing subsidy dollars to assist otherwise eligible individuals, HACG helps the provider extend the reach of their service dollars thereby supporting the overall success of the participant that is housed.

Participants that receive a Second Chance Voucher are required to have active case management for the full 24 months. There is a minimum of 12 visits per year with 80% of the visits in the participant's home. For the participant to continue to receive assistance for the full 24-month term they must meet the following guidelines:

1. Comply with case management requirement for the minimum period established
2. Keep at least 80% of scheduled appointments with case manager
3. Keep all appointments with the medical/mental health doctor, as applicable
4. Keep the rental unit clean and in good condition
5. Report changes in income or family composition to the case manager and the Housing Authority within 10 business days
6. Actively seek and gain monthly income within the first 12-month period.

At the end of the two-year term the voucher will expire. HACG will use data collected from Yardi housing software as well as reports provided by UWCV.

HACG anticipates the following for the Second Chance Voucher (SCV) Activity in FYE 2024:

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

B. NOT YET IMPLEMENTED ACTIVITIES

HACG does not have any activities that are not yet implemented.

C. ACTIVITIES ON HOLD

HACG does not have any activities on hold.

D. CLOSED OUT ACTIVITIES

- Activity 2014.01** **Community Choice** – MTW Authorizations: D.2.a, D.2.b – Approved in 2015, Implemented in 2015, and Closed in 2019 – HACG closed out this activity because the evaluation period was complete.
- Activity 2014.05** **Streamline HQS Inspections** – (Moved to 2016.03) - MTW Authorizations: D.5 (moved to 2016.03) – Approved in 2014, Implemented in 2015, and Closed in 2017 – Authorizations for this activity is granted under Notice PIH 2016-05, therefore HACG closed this activity.
- Activity 2014.06** **Rent Reform (Farley)** – MTW Authorizations: C.4, C.11 – Approved in 2014, Implemented in 2014, and Closed in 2018 – HACG closed out this activity because the evaluation period was complete.
- Activity 2015.01** **Eliminate Child Support Income from Rent Calculation** – MTW Authorizations: C.11 – Approved in 2015, Implemented in 2015, and Closed in 2017 – HACG used LIHTC funds to meet RAD requirements, which made this MTW Activity functionally obsolete.

Also closed out the Public Housing (PH) elements under MTW Activities 2014.03 and 2014.04. HACG used LIHTC funds to meet RAD requirements, which made PH elements functionally obsolete.

(V.) SOURCES AND USES OF MTW FUNDS

ANNUAL MTW PLAN

A. ESTIMATED SOURCES AND USES OF MTW FUNDS

i. Estimated Sources of MTW Funds

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

FDS LINE-ITEM NUMBER	FDS LINE-ITEM NAME	DOLLAR AMOUNT
70500 (70300+70400)	Total Tenant Revenue	\$260,116
70600	HUD PHA Operating Grants	\$26,304,412
70610	Capital Grants	\$334,589
70700 (70710+70720+70730+70740+70750)	Total Fee Revenue	\$665,000
71100+72000	Interest Income	\$524,572
71600	Gain or Loss on Sale of Capital Assets	\$0
71200+71300+71310+71400+71500	Other Income	\$859,165
70000	Total Revenue	\$28,947,854

ii. Estimated Uses of MTW Funds

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

FDS LINE-ITEM NUMBER	FDS LINE-ITEM NAME	DOLLAR AMOUNT
91000 (91100+91200+91400+91500+91600+91700+91800+91900)	Total Operating - Administrative	\$4,219,882
91300+91310+92000	Management Fee Expense	\$57,920
91810	Allocated Overhead	\$0
92500 (92100+92200+92300+92400)	Total Tenant Services	\$460,043
93000 (93100+93600+93200+93300+93400+93800)	Total Utilities	\$207,207
93500+93700	Labor	\$0
94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	\$2,164,098
95000 (95100+95200+95300+95500)	Total Protective Services	\$18,352
96100 (96110+96120+96130+96140)	Total Insurance Premiums	\$330,400
96000 (96200+96210+96300+96400+96500+96600+96800)	Total Other General Expenses	\$2,543,423
96700 (96710+96720+96730)	Total Interest Expense & Amortization Cost	\$0
97100+97200	Total Extraordinary Maintenance	\$0
97300+97350	HAP + HAP Portability-In	\$17,953,955
97400	Depreciation Expense	\$992,574
97500+97600+97700+97800	All Other Expense	\$0
90000	Total Expenses	\$28,947,854

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

N/A

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

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

PLANNED USE OF MTW SINGLE FUND FLEXIBILITY
HACG uses the MTW Single-Fund flexibility to combine its funding sources to form the MTW Block Grant that will be used to administer current and future MTW Activities, rehabilitation associated with RAD or RAD/Section 18 Blend Disposition, construction and/or Gap/Debt Financing of new developments. Additional Use of MTW Single Fund Flexibility is the following: Expand HACG’s affordable housing portfolio by acquisition of or development of affordable housing units; utilize MTW funds for extraordinary maintenance, enhanced security, relocation, and rehabilitation of HACG controlled existing affordable housing; assist with providing Wi-Fi Infrastructure for all HACG properties; and strategically reduce debt at HACG controlled affordable housing to maintain financial viability. The MTW Single-Fund Flexibility will be used to continue operations during any current and future government shutdown.

B. LOCAL ASSET MANGEMENT PLAN

i. Is the MTW PHA allocating costs within statute?

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

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

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

C. RENTAL ASSISTANCE DEMONSTRATION (RAD) PARTICIPATION

i. Description of RAD Participation

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

RENTAL ASSISTANCE DEMONSTRATION (RAD) PARTICIPATION

HACG received a Portfolio Award January 7, 2014, to convert 1,321 to Project-Based Vouchers under RAD Component One. HACG submitted a RAD Significant Amendment on November 10, 2015, with the FY 2016 Annual MTW Plan Second Amendment and it was approved by HUD on February 11, 2016. FY 2023 Annual MTW Plan was amended in July 2023, to include revisions to the RAD Significant Amendment regarding Warren Williams Homes (GA004000405).

As of this Plan date, HACG has converted 838 units to RAD PBV as well as 410 units to HCV PBV. HACG has CHAP awards for the remaining 425 public housing units to convert to RAD.

Chase Homes (GA004000407) consisting of 108 units are removed from the RAD conversion due to SAC Section 18 demolition approval. The CHAP for Chase Homes was returned on May 14, 2020. Elizabeth F. Canty Homes (GA004000408) Building 704 consisting of 6 units are removed from the RAD conversion due to the building being in the floodway and could pose a safety risk to the residents and property. The remaining 243 units at Elizabeth F. Canty Homes will be converted to long-term Section 8 assisted PBV units under the RAD Program and/or SAC Demolition Approval. Warren Williams Homes (GA004000405) Building C301, Units 702G and 702H was removed from the RAD conversion and received De Minimis approval from HUD to demolish. The units were obsolete due to substantial physical deterioration because of foundation issues that could not be corrected. The remaining 182 units at Warren Williams Homes will be converted to RAD/Section 18 Blend in Spring 2024.

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

No

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

N/A

VI. ADMINISTRATIVE

A. RESOLUTION ADOPTING THE ANNUAL MTW PLAN

The Board resolution adopting the FY 2024 Annual MTW Plan and The MTW Plan Certification of Compliance is included in Appendix A. HACG Board of Commissioners adopted Resolution #XXXX at its September 20, 2023, board meeting.

B. DOCUMENTATION OF PUBLIC PROCESS

The Annual MTW Plan was available for public review from July 28, 2023 through August 27, 2023, at the following locations:

- ◆ The Columbus Public Library, 3000 Macon Road (2nd floor reference desk);
- ◆ HACG’s Administrative Offices
 - Central Office, 1000 Wynnton Road (front desk);
 - Tenant Selection Office, 1146 Martin Luther King Jr. Boulevard (front desk)
 - Site Rental Offices, various addresses citywide (front desk)
- ◆ HACG’s Facebook: <https://www.facebook.com/The-Housing-Authority-of-Columbus-Georgia-110059770673833>
- ◆ HACG Website: <http://www.columbushousing.org>
- ◆ HACG advertised all Public Hearings and Public Meetings in accordance with the Annual MTW Plan guidelines.

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

- ◆ August 22, 2023, via Zoom or In-Person, at 11:00 a.m., Dial 1-646-876-9923 or <https://us06web.zoom.us/j/84964708196> Meeting ID: 849 6470 8196 to join the meeting
- ◆ August 22, 2023, via Zoom or In-Person at 2:00 p.m., Dial 1-646-876-9923 or <https://us06web.zoom.us/j/83904701983> Meeting ID: 839 0470 1983 to join the meeting

All comments received prior to August 28, 2023, were incorporated into the Annual MTW Plan. Comments are located in Appendix B.

C. PLANNED AND ONGOING EVALUATIONS

HACG’s does not have any planned and ongoing evaluations.

D. LOBBYING DISCLOSURES

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

APPENDIX SECTION

RESOLUTION NO:

A RESOLUTION APPROVING THE MOVING TO WORK (MTW) DEMONSTRATION PROGRAM'S FISCAL YEAR 2024 ANNUAL PLAN AND SUBMISSION OF SAID PLAN AND PLAN'S CERTIFICATIONS OF COMPLIANCE TO THE DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT (HUD)

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

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

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

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

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

WHEREAS, the proposed FY 2024 Annual MTW Plan was made available for public review and comment from July 28, 2023 to August 27, 2023, and public hearings/meetings were held on the proposed FY 2024 Plan on August 22, 2023; and,

WHEREAS, HACG considered all comments received regarding said FY 2024 MTW Plan:

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

1. The HACG's FY 2024 Annual MTW Plan is approved.
2. The Chairman or Secretary/Chief Executive Officer is authorized to execute the Certifications of Compliance; and,
3. Submission of said Certifications and FY 2024 Annual MTW Plan to HUD is authorized.

R. Larry Cardin
Name of Authorized Official

September 20, 2023
Date

Signature

MTW 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 MTW Supplement to the Annual PHA Plan**

Acting on behalf of the Board of Commissioners of the Moving to Work Public Housing Agency (MTW PHA) listed below, as its Chairperson or other authorized MTW PHA official if there is no Board of Commissioners, I approve the submission of the MTW Supplement to the Annual PHA Plan for the MTW PHA Fiscal Year beginning (01/01/2024), hereinafter referred to as "the MTW Supplement", 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 MTW Supplement and implementation thereof:

- (1) The PHA made the proposed MTW Supplement and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the MTW Supplement and invited public comment.
- (2) The MTW PHA took into consideration public and resident comments (including those of its Resident Advisory Board(s) or tenant associations, as applicable) before approval of the MTW Supplement by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the annual MTW Supplement.
- (3) The MTW PHA certifies that the Board of Directors has reviewed and approved the budget for the Capital Fund Program grants contained in the Capital Fund Program Annual Statement/Performance and Evaluation Report, form HUD-50075.1 (or successor form as required by HUD).
- (4) The MTW PHA will carry out the MTW Supplement in conformity with Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d-2000d-4), the Fair Housing Act (42 U.S.C. 3601-19), section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), and title II of the Americans with Disabilities Act of 1990 (42 U.S.C. 12101 et seq.) all regulations implementing these authorities; and other applicable Federal, State, and local civil rights laws.
- (5) The MTW Supplement 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 MTW Supplement contains a certification by the appropriate state or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice, for the MTW PHA's jurisdiction and a description of the manner in which the MTW Supplement is consistent with the applicable Consolidated Plan.
- (7) The MTW PHA will affirmatively further fair housing, which means that it will: (i) take meaningful actions to further the goals identified by the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR 5.150-5.180 and 903.15; (ii) take no action that is materially inconsistent with its obligation to affirmatively further fair housing; and (iii) address fair housing issues and contributing factors in its programs, in accordance with 24 CFR 903.7(o)(3) and 903.15(d). Note: Until the PHA is required to submit an AFH, and that AFH has been accepted by HUD, the PHA must follow the certification requirements of 24 CFR 903.7(o) in effect prior to August 17, 2015. Under these requirements, the PHA will be considered in compliance with the certification requirements of 24 CFR 903.7(o)(1)-(3) and 903.15(d) if it: (i) examines its programs or proposed programs; (ii) identifies any impediments to fair housing choice within those programs; (iii) addresses those impediments in a reasonable fashion in view of the resources available; (iv) works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and (v) maintains records reflecting these analyses and actions.
- (8) The MTW PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975 and HUD's implementing regulations at 24 C.F.R. Part 146.
- (9) In accordance with 24 CFR 5.105(a)(2), HUD's Equal Access Rule, the MTW PHA will not make a determination of eligibility for housing based on sexual orientation, gender identity, or marital status and will make no inquiries concerning the gender identification or sexual orientation of an applicant for or occupant of HUD-assisted housing.
- (10) The MTW PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
- (11) The MTW PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low- or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
- (12) The MTW PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.
- (13) The MTW PHA will comply with requirements with regard to compliance with restrictions on lobbying required by 24 CFR Part 87, together with disclosure forms if required by this Part, and with restrictions on payments to influence Federal Transactions, in accordance with the Byrd Amendment.
- (14) The MTW PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.

- (15) The MTW PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
- (16) The MTW PHA will provide HUD or the responsible entity any documentation needed to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58. Regardless of who acts as the responsible entity, the MTW PHA will maintain documentation that verifies compliance with environmental requirements pursuant to 24 Part 58 and 24 CFR Part 50 and will make this documentation available to HUD upon its request.
- (17) With respect to public housing and applicable local, non-traditional development the MTW PHA will comply with Davis-Bacon or HUD determined wage rate requirements under section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
- (18) The MTW PHA will keep records in accordance with 2 CFR 200.333-200.337 and facilitate an effective audit to determine compliance with program requirements.
- (19) The MTW PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.
- (20) The MTW PHA will comply with the policies, guidelines, and requirements of 2 CFR Part 200.
- (21) The MTW PHA must fulfill its responsibilities to comply with and ensure enforcement of housing quality standards as required in PIH Notice 2011-45, or successor notice, for any local, non-traditional program units. The MTW PHA must fulfill its responsibilities to comply with and ensure enforcement of Housing Quality Standards, as defined in 24 CFR Part 982, for any Housing Choice Voucher units under administration.
- (22) The MTW PHA will undertake only activities and programs covered by the Moving to Work Operations Notice in a manner consistent with its MTW Supplement and will utilize covered grant funds only for activities that are approvable under the Moving to Work Operations Notice and included in its MTW Supplement. MTW Waivers activities being implemented by the agency must fall within the safe harbors outlined in Appendix I of the Moving to Work Operations Notice and/or HUD approved Agency-Specific or Safe Harbor Waivers.
- (23) All attachments to the MTW Supplement have been and will continue to be available at all times and all locations that the MTW Supplement is available for public inspection. All required supporting documents have been made available for public inspection along with the MTW Supplement and additional requirements at the primary business office of the PHA and at all other times and locations identified by the MTW PHA in its MTW Supplement and will continue to be made available at least at the primary business office of the MTW PHA.

The Housing Authority of Columbus, Georgia	GA004
<i>MTW PHA NAME</i>	<i>MTW PHA NUMBER/HA CODE</i>
<i>I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802).</i>	
Lisa L. Walters	Chief Executive Officer
<i>NAME OF AUTHORIZED OFFICIAL</i>	<i>TITLE</i>
	September 20, 2023
<i>SIGNATURE</i>	<i>DATE</i>
* <i>Must be signed by either the Chairperson or Secretary of the Board of the MTW PHA's legislative body. This certification cannot be signed by an employee unless authorized by the MTW PHA Board to do so. If this document is not signed by the Chairperson or Secretary, documentation such as the by-laws or authorizing board resolution must accompany this certification.</i>	

**HOUSING AUTHORITY OF COLUMBUS, GEORGIA'S
PUBLIC COMMENT PROCESS**

Date	Action / Event	Attendance Count
Friday, July 28, 2023, and Sunday, July 30, 2023	Public Hearing announcement, dates published in the Ledger-Enquirer (Columbus' local newspaper), HACG's Facebook, and on HACG's website, www.columbushousing.org	Not Applicable
Friday, July 28, 2023	Sent email to HACG staff/affiliates announcing public hearing. Included flyer for recipients to print/post in conspicuous areas for clients, employees, landlords, residents, and visitors to see.	46
Tuesday, August 22, 2023	11 a.m. Public Hearing: HACG staff presented FY 2024 Annual MTW Plan at the Public Meeting via Zoom	4
Tuesday, August 22, 2023	2 p.m. Public Hearing: HACG staff presented FY 2024 Annual MTW Plan at the Public Meeting via Zoom	3

PUBLIC HEARING – TUESDAY, AUGUST 22, 2023, AT 11:00 A.M.

FY 2024 ANNUAL MTW PLAN

PUBLIC COMMENTS AND RESPONSES

Line	Public Comment	HACG's Response
1		
2		
3		

PUBLIC HEARING – TUESDAY, AUGUST 22, 2023, AT 2:00 P.M.

FY 2024 ANNUAL MTW PLAN

PUBLIC COMMENTS AND RESPONSES

Line	Public Comment	HACG's Response
1		

PLANNED AND ONGOING EVALUATIONS

Appendix C

HACG's does not have any planned and ongoing evaluations.

DISCLOSURE OF LOBBYING ACTIVITIES

Complete this form to disclose lobbying activities pursuant to 31 U.S.C. 1352
(See reverse for public burden disclosure.)

Approved by OMB
0348-0046

1. Type of Federal Action: <input type="checkbox"/> a. contract <input type="checkbox"/> b. grant <input type="checkbox"/> c. cooperative agreement <input type="checkbox"/> d. loan <input type="checkbox"/> e. loan guarantee <input type="checkbox"/> f. loan insurance		2. Status of Federal Action: <input type="checkbox"/> a. bid/offer/application <input type="checkbox"/> b. initial award <input type="checkbox"/> c. post-award		3. Report Type: <input type="checkbox"/> a. initial filing <input type="checkbox"/> b. material change For Material Change Only: year _____ quarter _____ date of last report _____	
4. Name and Address of Reporting Entity: <input checked="" type="checkbox"/> Prime <input type="checkbox"/> Subawardee Tier _____, if known: Congressional District, if known: 4c			5. If Reporting Entity in No. 4 is a Subawardee, Enter Name and Address of Prime: The Housing Authority of Columbus, Georgia 1000 Wynnton Road P.O. Box 630 Columbus, Georgia 31902-0630 Congressional District, if known:		
6. Federal Department/Agency:			7. Federal Program Name/Description: CFDA Number, if applicable: _____		
8. Federal Action Number, if known:			9. Award Amount, if known: \$		
10. a. Name and Address of Lobbying Registrant <i>(if individual, last name, first name, MI):</i>			b. Individuals Performing Services <i>(including address if different from No. 10a)</i> <i>(last name, first name, MI):</i>		
11. Information requested through this form is authorized by title 31 U.S.C. section 1352. This disclosure of lobbying activities is a material representation of fact upon which reliance was placed by the tier above when this transaction was made or entered into. This disclosure is required pursuant to 31 U.S.C. 1352. This information will be available for public inspection. Any person who fails to file the required disclosure shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.			Signature: _____ Print Name: <u>Lisa L. Walters</u> Title: <u>Chief Executive Officer</u> Telephone No.: <u>706-571-2800</u> Date: <u>09/20/2023</u>		
Federal Use Only:					Authorized for Local Reproduction Standard Form LLL (Rev. 7-97)

**Certification of Payments
to Influence Federal Transactions**

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

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

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

Applicant Name

The Housing Authority of Columbus, Georgia

Program/Activity Receiving Federal Grant Funding

Moving to Work (MTW) Demonstration Program

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

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

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

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

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

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

Name of Authorized Official

Lisa L. Walters

Title

Chief Executive Officer

Signature

Date (mm/dd/yyyy)

09/20/2023

Previous edition is obsolete

form HUD 50071 (01/14)