

Improving Housing Options for Individuals with Disabilities
Under the State's Settlement Agreement
and
Money Follows the Person Initiative

Strategic Recommendations
for the Georgia Department of Community Affairs

Prepared by the Technical Assistance Collaborative

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Strategy Paper

The Georgia Department of Community Affairs (DCA) has a strong track record of creating and supporting housing opportunities for people with disabilities through an array of programs including its Permanent Supportive Housing Program, Shelter Plus Care initiatives, and Housing Choice Voucher (HCV) program. Since 2000, DCA has financed the construction of 508 units of supportive housing, provided 1,511 units of Shelter Plus Care assistance, and provided 373 units of tenant and project-based HCV rental assistance targeted to households that include an individual with a disability. Since 2005, DCA has financed the construction of 415 units of supportive through the Low Income Housing Tax Credit (Tax Credit) program, with an additional 296 units currently under construction. The Tax Credit Program has also financed the development of 750 additional units that are equipped for the mobility impaired and participating owners have agreed to set aside up to 5% of their units, approximately 500 units, for special needs tenants with a rental assistance voucher. DCA has also implemented policies within its Tax Credit Program designed to foster the marketing of units to providers serving individuals with a disability or who are homeless. To help market all of these units as well as those created solely in the private sector, DCA has established GeorgiaHousingSearch.org to facilitate the identification of affordable rental units by individuals with special needs.

DCA has expanded this commitment by developing housing strategies provided in this document to help meet the terms and conditions outlined in the *Settlement Agreement* (2010) between the State of Georgia and the U.S. Department of Justice (DOJ). The *Settlement Agreement* requires the State to assist two disability sub-populations:

- 9,000 people with mental illness who have co-existing medical, behavioral health, and/or co-occurring substance use disorders who are currently served in the state's hospitals, frequently admitted to state hospitals, frequently seen in hospital emergency rooms, chronically homeless, and/or being released from jails and prisons.
- People with developmental disabilities transitioning from institutions or who are at risk of institutionalization.

In addition to the *Settlement Agreement*, Georgia through the Department of Community Health (DCH) participates in the federal Centers for Medicare and Medicaid Services (CMS) Money Follows the Person (MFP) Demonstration program “designed to help individuals who are institutionalized in nursing facilities and intermediate care facilities (ICF) for people with developmental disabilities return to their homes and communities.”¹

DCA recognizes that it has a significant role to play in creating housing opportunities to not only meet the terms of the *Settlement Agreement*, but also to meet the specific needs of the individuals covered by the MFP Initiative. Furthermore, DCA acknowledges that there are important interagency partnerships and communication protocols that must be in place, and that a joint partnership with the Georgia Department of Behavioral Health and Developmental Disabilities (DBHDD) and DCH is beneficial

¹ Georgia DCH Website: http://dch.georgia.gov/00/article/0,2086,31446711_131673936_158019816,00.html

to the successful long-term achievement of community integration as outlined in Georgia's *Settlement Agreement* and in the MFP Demonstration program.

In addition to embracing its role in creating housing opportunities, DCA seeks to support the broader goals of community integration expressed in the original Olmstead Decision. The 1999 US Supreme Court decision in *Olmstead v L.C.* held that people with disabilities have the right to live in the least restrictive, most integrated settings, and created a mandate for states to develop comprehensive plans to end unnecessary institutionalization of people with disabilities. Several states have been sued by the Department of Justice or other advocates asserting an overreliance on segregated, institutional settings and have entered into Settlement Agreements that implement various strategies to develop normalized, integrated community living options.

Other efforts at the federal level further support DCA's direction. The Frank Melville Supportive Housing Investment Act of 2010 (discussed in greater detail in Strategy 3) restricts new Section 811-financed multi-family projects, including condominiums or cooperative housing, to have an occupancy preference of no more than 25% of the units for people with disabilities. CMS is also attempting to define integration as part of its eligibility criteria for Home and Community Based Services (HCBS).

Given the changes in federal housing law, proposed Medicaid financing criteria, and overall changes in State practices to implement the Olmstead decision, DCA recognizes that it must be deliberate in developing new housing options for people with disabilities in non-segregated, integrated settings. As such, DCA will prioritize development resources to focus on (1) the construction of new supportive housing options that limit occupancy set-asides for people with disabilities to no more than 20% in a single apartment building and (2) the preservation of existing supportive housing opportunities. Development proposals of new supportive housing options that exceed the 20% set-aside limitation will remain eligible to participate in housing programs administered by DCA, but will not be eligible for targeted DCA funds or special incentives. Annually, DCA will review these integrated development and preservation priorities as the Settlement Agreement is implemented to ensure that the evolving needs of special populations are considered in all DCA housing programs.

A. Steering Committee

DCA proposes to establish a standing Steering Committee composed of representatives from DCA, the Governor's Office of Planning and Budget (OPB), DBHDD, and DCH. The purpose of the Steering Committee would be to align Agency policy objectives, establish budget requests for joint initiatives, and address common agency issues. The Steering Committee would meet quarterly beginning in March 2012. Assistant Commissioner level representation from all agencies is critical in order for this Steering Committee to be empowered to make immediate decisions regarding resources, priorities and multiagency linkages and agreements. It also signifies each agencies commitment to community integration of people with disabilities. Specific subcommittees could be established as needed to address housing/services issues or other tasks as directed by the Steering Committee.

The initial focus of the Steering Committee would be to support the State's efforts related to the *Settlement Agreement* and MFP initiative. Membership in the future could be expanded to include other relevant state agencies, such as the Department of Corrections and the State Board of Pardons and Paroles.

B. Unified Communications Strategy

As Georgia's state housing agency, DCA proposes to work with its sister state agencies to establish a process of outreach, education, and on-going communication with Public Housing Agencies (PHAs), housing developers, private landlords, and other community stakeholders on housing issues related to the *Settlement Agreement* and MFP. Absent this coordinated unified communication strategy, disparate state agencies communicating with these stakeholders often results in confusing, sometimes conflicting, messages coming from the State regarding housing needs and preferred models. A strong, centralized communication approach facilitated by DCA, in partnership with DBHDD and DCH, is more likely to result in PHAs, housing developers and other stakeholders being willing to help meet the State's goals under the *Settlement Agreement* and the MFP Initiative.

C. Establish and Define Referral Processes to Fill Newly Available Housing Units.

In order to secure broad support for the housing strategies described below, PHAs, landlords, developers and property managers will need assurances that referrals will be made in a timely and efficient manner.

Housing Search

The GeorgiaHousingSearch.org website is sponsored by DCA and is an effective tool for people seeking affordable housing. DBHDD, DCH and direct service providers report that the site is helpful in locating potential housing units for persons with disabilities. Housing information is available by geographic region, apartment size, rent levels, accessibility features, proximity to public transportation, language spoken by property managers, and telephone and email contact information.

GeorgiaHousingSearch.org currently includes 175,000 units with approximately eight percent available for rent at any point in time. GeorgiaHousingSearch.org should be the primary tool for the listing of all affordable housing properties in the state, including Low Income Housing Tax Credit, USDA financed, or HUD financed properties. To accomplish this objective, DCA will develop strategies to increase the number of publicly and privately financed units listed in GeorgiaHousingSearch.org.

While the site currently provides invaluable information, DCA proposes to convene a focus group with the assistance of DBHDD and DCH that will be tasked with developing recommendations for improving the website, and establishing a process for training or assisting consumers, providers, and other agencies in obtaining up-to-date information about housing vacancies. With the assistance of DBHDD and DCH and as resources allow, DCA will implement strategies to address issues raised by this focus group.

Referral Strategy

In addition to the housing search assistance that can be provided through GeorgiaHousingSearch.org, DCA proposes that an overarching referral and housing search strategy be designed to facilitate the effective linkage of thousands of people within these target populations who are currently living in various settings (including people in institutions, people in the community but who are at risk of institutionalization, and those who are homeless) to the housing resources proposed to be provided/facilitated by DCA and potentially by other housing providers (e.g. Public Housing Authorities). DCA will continue to look to DBHDD and DCH to better refine the specific housing search and referral process that aligns the individual participant with the housing option that best meets their need. This overall Housing Search and Referral Process should be coordinated between DBHDD and DCH while responsibility for GeorgiaHousingSearch.org will remain with DCA.

D. Strategies to Improve Access to the Supply of Affordable Housing for People with Disabilities

Below are several strategies that DCA is proposing to improve access to affordable housing for people with disabilities covered by the *Settlement Agreement* and the MFP program.

Strategy 1: DCA Housing Choice Voucher Settlement Agreement Set-aside

The U.S. Department of Housing and Urban Development's (HUD) Housing Choice Voucher (HCV) program is the major federal program for assisting very low-income families, the elderly, and people with disabilities to obtain decent, safe, and affordable housing in the community. These vouchers are commonly referred to as "tenant-based rental assistance." HCV voucher holders are able to access privately owned housing units in the community because of these vouchers. As such, the HCV program is a vital tool to ensure community integration by providing the financial means for individuals and families to secure appropriate housing in neighborhoods of their choice. The tenant generally pays 30-40% of their income toward rent and any utilities. HUD pays the balance of the rent provided the unit meets all of HUD's HCV program requirements (e.g. the rent requested by the owner is reasonable, the unit meets HUD Housing Quality Standards, etc.). In Georgia, HUD's HCV program is administered through 22 Public Housing Agencies, including DCA.

DCA administers approximately 15,500 vouchers within its HCV program jurisdictional area and these resources are all currently being utilized by participating households.² The number of vouchers issued by DCA has been reduced over the past few years due to federal budget constraints. Although DCA's current voucher attrition rate averages 123 vouchers per month, DCA's HCV Program is limited by funding availability³. Additionally, the higher rent tiers between sections of the state may further decrease the actual number of vouchers issued. Therefore, DCA cannot always re-issue vouchers on a 1 for 1 basis. Eligibility criteria for DCA vouchers include HUD mandated requirements as well as additional DCA screening criteria permitted under HUD's HCV rules. These criteria are summarized in

² DCA administers the HCV program in 149 counties. It does not administer the HCV program in: Bibb, Chatham, Clayton, Cobb, DeKalb (Decatur), Fulton (Atlanta), Glynn, Muscogee, Richmond and Sumter.

³ The current attrition rate is based on the number of participants who are removed from the program from July 2010 through June 2011. Attrition rates vary and are subject to change on a monthly basis.

Appendix A. Since DCA administers the HCV program in multiple counties, it maintains a separate waiting list for each county. New voucher recipients are selected from the DCA Waiting List based on the Waiting List Selection process outlined in the DCA Administrative Plan on file with HUD. This ranking order of selection is based upon the date and time of application as well as the following criteria: (1) portability families⁴ and those identified for special program eligibility by HUD; (2) local residency preference; (3) income targeted; (4) other eligible households. HUD allows PHAs, such as DCA, to establish these and other waiting list preferences to address local community needs as long as the preferences do not violate federal or state Fair Housing Laws.

DCA's waiting list is maintained on a county by county basis. Currently there are over 1,400 households on its combined waiting list. DCA's goal is to have applicants only stay on the waiting list for approximately two years⁵, which results in an overall smaller waiting lists but one that does not fully capture the overall demand for HCVs.

People covered by the *Settlement Agreement* are a priority for the State of Georgia. DCA recognizes that HCVs are a critical tool in facilitating the movement of people with disabilities out of institutions and into the community. **DCA will allocate 100 vouchers in FY2012 and 700 vouchers each year in FY2013 through FY2015 as resources allow for persons covered by the *Settlement Agreement*.** It should be noted that, consistent with DCA's HCV Administration Plan, these HCVs can only be leased in communities within DCA's HCV program jurisdiction. DCA has been advised to seek HUD Headquarters approval to implement this tenant selection preference and has sent a written request to senior HUD officials.

Strategy 1A: Linking DCA's Settlement Agreement Voucher Set-Aside to DBHDD Rental Assistance Program Participants

Under the *Settlement Agreement*, DBHDD established the Georgia Housing Voucher Program (GHVP), a state-funded, tenant-based rental assistance program, that, when fully phased in, will serve approximately 2,000 individuals covered by the *Settlement Agreement*. Through GHVP, DBHDD covers 100% of the rent for a unit leased to an individual covered by the *Settlement Agreement*, up to the Fair Market Rent. The rent for a specific unit may not exceed the rent for a comparable non-GHVP assisted unit in the same property. Unlike the HCV program, the GHVP can also provide funding for one-time costs associated with move-in expenses such as security and utility deposits, household necessities, and other start up living expenses. Prior to allocating GHVP resources to a prospective tenant, DBHDD encourages providers to seek to enroll the tenant or place the tenant on federal housing support programs (such as HCV, Shelter Plus Care, etc.)

To meet DBHDD's goal to maximize overall movement of individuals covered by the *Settlement Agreement* into federally sponsored housing, DCA proposes to create a structured partnership with

⁴ Families who have a HCV originally designated by one PHA but the family moves out of that PHA's jurisdiction into DCA's jurisdiction. DCA now administers that HCV.

⁵ Unfortunately, DCA cannot always meet this goal as exemplified by Gwinnett County where the waiting list was last opened in December 2006, yet 34 remain on the waiting list for a voucher.

DBHDD that would facilitate the transition of GHVP participants who have leased units into available DCA Settlement Agreement allocated HCV units created through Strategy 1. This approach would expedite a seamless transition of GHVP participants to the HCV program while allowing the participant to benefit from the bridge funding available from DBHDD to settle into the rental unit and remain in the unit they have already leased. This strategy also would allow DBHDD to re-issue the available GHVP rental subsidy to another household. DCA will allocate up to 600 HCVs created in Strategy 1 to be linked to the GHVP program. In order to ensure that this strategy provides a seamless transition for GHVP program participants as well as GHVP landlords, certain GHVP program requirements must be the same as the HCV program. For example:

- GHVP units must meet Housing Quality Standards;
- GHVP units must meet HUD/DCA’s HCV “rent reasonableness” and “payment standard” requirements;
- Tenants assisted with GHVP must agree to accept a HCV when one becomes available and owners must agree to accept HCV payments from DCA;
- GHVP participants transitioning to the HCV program must meet basic HCV eligibility criteria;⁶ and
- GHVP participants must agree to pay rent to the owner of their unit in accordance with all HCV program requirements.

This approach –often referred to as a “bridge subsidy” linked to permanent rental assistance – has worked successfully in other states that have provided temporary rental subsidies to certain sub-populations of people with disabilities. However, the success of this approach would rely on the ability of DBHDD to align and synchronize the GHVP program with the requirements of the HCV program, including the 30 percent of income tenant rent contribution.⁷

Strategy 2: Shelter Plus Care Sponsor-Based Expansion

DCA has been extremely successful in obtaining McKinney-Vento Shelter Plus Care (SPC) subsidies for homeless persons with disabilities. SPC provides rental assistance in a manner similar to the HCV program for persons who meet specific criteria associated with the HUD definition of homeless⁸ and who have a documented disability such as serious mental illness, substance abuse and/or HIV/AIDS. Since FY 1995, DCA has secured SPC funding to create over 1,500 units of permanent supportive housing.

Applicants can request SPC funds from HUD as TBRA, sponsor-based rental assistance or project-based rental assistance (PBRA). With sponsor based rental assistance, a third party sponsor (a non-profit organization, often a service provider) enters into a lease with a landlord and sublets the unit to an

⁶ DCA may need to review its existing eligibility criteria and reasonable accommodation policies.

⁷ There may be some instances when an individual cannot meet HCV eligibility requirements and DBHDD will continue to serve the individual with GHVP.

⁸ To meet Shelter Plus Care homeless eligibility a person must come from the street or emergency shelter. Persons may also come from institutional placements of less than 90 days or from transitional housing programs, provided they were on the street or in shelter prior to those placements.

eligible homeless disabled household. In all SPC components, tenants pay approximately 30% of their income toward rent and utilities and the SPC subsidy pays the balance of this monthly cost. The following table highlights the distribution of DCA’s SPC program based on the type of rental assistance:

Shelter Plus Care Component	Total Number of Units
Sponsor based rental assistance	1,385
Project based rental assistance	126 ⁹
Total	1,511

In many instances, HUD’s formula for awarding SPC grants creates grant savings since the actual cumulative costs of rental assistance are lower than the amount HUD uses to calculate the grant. These savings occur for several reasons including:

- SPC participants with a source of income pay a portion of the rent and therefore do not utilize the full amount of rental assistance—based on the Fair Market Rent (FMR) – allocated by HUD;
- In some communities, sponsors are able to lease units at less than the local FMRs;
- The grant award is based on the assumption that all units are leased 100 percent of the time starting on the first day of the grant term; and
- Most SPC projects experience some vacancies.

According to HUD regulations, SPC grant savings may be used for the following:

- To pay administrative costs as described later (up to 8 percent);
- To repair damage to the units (up to one month’s rent);
- To pay security deposits (up to one month’s rent);
- To pay vacancy payments (up to one month’s rent);
- To cover rent increases up to locally determined reasonable rents; and
- To serve a greater number of participants.

To maximize these grant savings, DCA could allocate its SPC resources to serve a greater number of participants. DCA anticipates that by accessing new SPC resources and maximizing use of existing grant awards, 474 more SPC units can be created through FY15. **As part of this strategy, DCA will prioritize utilization of available SPC funds to assist homeless people with disabilities who will receive supportive services through the *Settlement Agreement*.** This strategy will require close coordination with DBHDD to estimate the number of SPC units that could be made available, identify and verify the target population before they are assisted, and ensure the linkage to DBHDD supportive services at the time the SPC assistance is provided. Since the majority of the DCA SPC grants are sponsor-based, expansion must be within the sponsor-based model. In the past, one obstacle to this proposed expansion has been the ability to identify available supportive services to meet the required SPC match requirement, so close coordination with DBHDD is critical to the success of this strategy.

⁹ DCA has a request pending with HUD to change three project based rental assistance SPC grants (76 units) to sponsor based rental assistance.

Through this strategy, DCA will work to identify units in existing rental housing developments that could benefit from the SPC rental assistance. Through this sponsor-based strategy, DCA would provide owners with a guaranteed rental income increase and greater access to affordable housing for homeless people covered by the *Settlement Agreement*.

To implement this SPC strategy successfully:

- DCA must work with its legal counsel to develop SPC sponsor based rental assistance leases and subleases that would meet IRS Part 42 requirements concerning tenants holding leases in LIHTC projects;
- DCA and DBHDD must develop procedures to identify, verify, and refer eligible households to DCA's SPC program and sponsors; and
- DBHDD must identify and commit appropriate supportive services to support SPC tenants.

Strategy 2A: Collaborate with DBHDD to Identify and Report on *Settlement Agreement* Class Members Being Served by the SPC Programs

As stated earlier, the SPC program targets a limited class of homeless individuals with disabilities, including persons with serious mental illness. It is highly likely that many, if not most, of the people who are being referred to vacancies in DCA's existing SPC program are people with serious mental illness who are chronically homeless, or who otherwise may be covered by the *Settlement Agreement*. DCA's current data collection process does not include a fully effective method for identifying and reporting on *Settlement Agreement* eligible participants who are being referred to and/or assisted by DCA's SPC program. DCA is proposing a strategy to work collaboratively with DBHDD to improve current data collection processes so that DCA/DBHDD can identify and accurately report on the number of homeless people with mental illness who may be covered by the *Settlement Agreement* who are being assisted through DCA's SPC program.

To be successful, this strategy would require the following:

- Review and analysis of possible changes needed to current data collection processes including HMIS;
- Collaboration with DBHDD to ensure effective methods of identification and verification of homeless people who may be covered by the *Settlement Agreement*; and
- Training and technical assistance support for DCA SPC sponsors regarding DCA and/or DBHDD data collection and reporting requirements.

Strategy 2B: Improve Data Collection and Reporting on Locally Administered McKinney Vento Permanent Housing Programs

In addition to DCA's implementation of the Balance of State Continuum of Care, there are six other Continuums of Care (CoCs) in Georgia either currently receiving HUD McKinney-Vento resources for permanent supportive housing or who could apply for permanent supportive housing through the HUD Continuum of Care process. Similar to Strategy 2A, it is possible that these local programs are assisting

homeless individuals with mental illness who meet the *Settlement Agreement* definition. DCA will work collaboratively with DHBDD to assist local CoC communities in Georgia to improve their data collection process in a manner consistent with the methods established by DCA and DBHDD in Strategy 2A above. This strategy would allow DBHDD, with DCA support, to accurately report on the number of homeless people who may be covered by the *Settlement Agreement* who are being assisted through local programs and to coordinate and manage the delivery of essential supportive services to formerly homeless people living in HUD McKinney-Vento funded permanent supportive housing.

To be successful, this strategy would require the following:

- Review and analysis of possible changes needed to local CoC HMIS data standards based on the model adopted by DCA/DBHDD in Strategy 2A above;
- Assist DBHDD to establish collaborative relationships with local CoCs to identify, verify, and report on homeless people with mental illness who may be covered by the *Settlement Agreement* who could be provided with permanent supportive housing through locally administered programs; and
- Training and technical assistance support for local SHP providers regarding DBHDD data collection and reporting requirements.

Strategy 3: Section 811 Project Rental Assistance (PRA) Funding

The Section 811 Supportive Housing for Persons with Disabilities program (Section 811) is a symbolic HUD supportive housing program that has been modernized and reinvigorated as a result of the enactment of the Frank Melville Supportive Housing Investment Act of 2010. Section 811 creates permanent housing linked with voluntary supportive services for people with significant and long-term disabilities and has been used for many years to transition people from institutional settings to the community and to prevent unnecessary institutionalization. Section 811 is a project-based – rather than a tenant-based – approach to supportive housing. The project-based approach is intended to create a permanent supply of supportive housing units that is: (1) not dependent of the fluctuations of the rental housing market; and (2) not subject to the willingness of landlords to rent units to supportive housing tenants with rental vouchers.

In 2010, Section 811 was reformed by Congress to facilitate the creation of integrated project-based housing supportive housing.¹⁰ These reforms include a new competitive Section 811 Project Rental Assistance (PRA) option targeted specifically to State Housing Agencies. The PRA funds are used by the Housing Agency to create deeply affordable supportive housing units within affordable housing developments financed by the State Housing Agency through programs such as the LIHTC program, the HOME program, state bond financing, etc.

The Section 811 PRA option is modeled after successful efforts by state Housing Finance Agencies to create integrated supportive housing in LIHTC developments. To ensure the integrated housing

¹⁰ Prior to the 2010 legislation, Section 811 funding was used to develop non-profit owned group homes and independent living complexes that were exclusively reserved for people with disabilities.

approach is maintained, the Section 811 statute provides that no more than 25 percent of the units in any affordable housing property assisted with Section 811 PRA funds can have occupancy restrictions for people with disabilities. Many of these model states established set-aside policies within their LIHTC Qualified Allocation Plan to incentivize or require that 5-10 percent of the units in newly financed affordable housing properties be set-aside as supportive housing.

In FY 2012, HUD will make available approximately \$75 million in new Section 811 PRA funding to State Housing Agencies. These funds are projected to create as many as 2,500 PRA units nationally. A Notice of Funding Availability (NOFA) for PRA funds is expected to be published in February-March. HUD is also expected to publish a Notice of Proposed Rule Making (NPRM) for the reformed Section 811 program during that same time frame. Subject to DCA review of the NOFA and the NPRM, DCA proposes to submit an application to HUD for PRA funding in FY 2012, and during subsequent years when funding is appropriated by Congress for the Section 811 PRA option that will provide rental assistance for up to 150 units of housing at Tax Credit properties annually in Georgia.

In order to submit an application for competitive PRA funds, DCA must enter into a Section 811 formal written agreement with DBHDD and DCH that specifies:

- The target population(s) proposed to be assisted with Section 811 PRA funds;
- Methods of outreach and referral for the target population;
- Commitments of supportive services for the target population.

Based on the information currently available, it is expected that this application will be due at HUD in May or June of 2012.

DCA proposes to work closely with DBHDD and DCH to develop the Section 811 written partnership agreement and to assess/evaluate other important aspects of the Section 811 PRA strategy. For example, DCA will need to analyze opportunities to commit Section 811 PRA funds to new or existing affordable housing properties, based on information provided by DBHDD and DCH regarding the location(s) and unit sizes appropriate for the *Settlement Agreement* and MFP populations. DCA will also assess the feasibility of making commitments of PRA funds to create supportive housing units, based on the following statutory provisions of the Section 811 PRA option:

- The requirement that a 30-year use restriction be obtained for each PRA unit;
- DCA's 15-year renewable PRA contract with HUD; and
- The initial 5-year PRA funding commitment, renewable annually in year 6 and beyond, subject to appropriation.

To be successful, this strategy would require the following:

- Assessment of DCA's ability to commit PRA funds based on Section 811 statutory requirements;
- Further discussions/assessment with DBHDD and DCH regarding geographic and unit size issues;
- Through the Steering Committee proposed above, convene a cross-agency Section 811 PRA workgroup to prepare for the release of the Section 811 PRA NOFA and to develop the Section

811 PRA formal written agreement for submission to HUD. Once the target population(s) and service commitments are identified and confirmed, this workgroup would be responsible for making very specific decisions regarding: (1) the methods of outreach and referral that will be deployed to assure that Section 811 PRA units are occupied in a timely manner; (2) the system that will be utilized to track the availability of Section 811 units, including units that “turnover” after initial occupancy; and

- Prepare and submit a FY 2012 Section 811 PRA application to HUD.

Strategy 4: Marketing of Tax Credit Units to Populations with Disabilities

The Low Income Housing Tax Credit program creates over 2,100 units of affordable rental housing annually in Georgia. As a threshold to receipt of Tax Credit resources, DCA requires that each project selected for funding to prepare a Marketing Plan outlining how the project will market the units created in the project to tenants with special needs, including individuals covered under the Settlement Agreement or part of the MFP Demonstration. The Marketing Plan must incorporate outreach efforts to each service provider, homeless shelter, or local disability advocacy organization in the county in which the project is located. The Georgia Homeless Assistance Directory should be used as the central resource to identify local providers. Management agents must establish and maintain relationships with community service providers. The Marketing Plan must include a referral and screening process that will be used to refer tenants to the development, the screening criteria that will be used, and must make reasonable accommodations to facilitate the admittance of persons with disabilities or the homeless. The Owner must also agree to designate persons with disabilities or the homeless as having a priority for units with project-based rental assistance if allowable under the Owner’s rental assistance agreement for the development.

Strategy 5: HOME Tenant Based Rental Assistance

The HOME program is a formula grant of federal housing funds given to states and localities. DCA’s Federal Fiscal Year (FY) 2011 HOME allocation was \$21.5 million. The Federal FY 2012 budget anticipates a significant reduction of over 30% to \$14.8 million.

One of the uses of HOME funds is to provide tenant-based rental subsidies to eligible households. Congress specifically created the tenant-based rental assistance (TBRA) component of the HOME program so that very low-income households, including people with disabilities, could easily benefit from the program. HOME TBRA operates in much the same way as the HCV program except that HOME TBRA funding must be allocated by DCA in two-year funding increments from a specific one-year HOME allocation. The renewal of HOME TBRA funding after the initial two-year period is dependent on DCA having sufficient funding from future HOME appropriations from Congress. Therefore, in order to ensure housing stability, the use of HOME for MFP and Settlement Agreement populations must have a plan for the replacement of the HOME TBRA by the close of the two-year period. HOME has been a valuable tool for many states to meet certain policy imperatives. For example, in the 1990s, Massachusetts used HOME TBRA to address the significant increased need for housing among people with HIV/AIDS and

Texas used HOME funds for many years to assist people with disabilities to transition from nursing homes and institutions to community living.

DCA has proposed to allocate \$1,000,000 of HOME assistance in FY 2013, in part, to provide up to two-years of TBRA to eligible MFP clients until such time that the assisted individual can receive funding through DCA's HCV program. Additional HOME funds will be allocated yearly. In order to facilitate the long-term housing stability of these tenants and based on the availability of HCV resources, DCA will allocate up to 25 HCVs yearly to assist these individuals transition from HOME-funded rental assistance. DCA will consider making additional HOME TBRA available to MFP Demonstration program participants for assistance to individuals seeking to reside in a county not served by DCA's HCV program. To do so, DCA will seek to partner with DCH to link the HOME TBRA to permanent HCVs managed by local PHAs.

Strategy 6: Outreach to other Public Housing Agencies

Including DCA, there are 188 Public Housing Agencies operating in Georgia. Of these, 3 administer only a Housing Choice Voucher program, 165 administer only public housing units, and 19 administer both a HCV and public housing program. In total, these PHAs administer over 60,000 vouchers and own/manage over 44,000 units of federally funded public housing. Several of these PHAs have been proactive in expanding housing opportunities for persons with disabilities, persons who are homeless or other sub-populations that also meet general HUD HCV guidelines. In doing so, some of these PHAs have aggressively sought additional resources from HUD and other sources to create affordable housing opportunities.

Some of these PHAs may be willing to partner with DBHDD and/or DCH to assist Georgia to address the needs of people covered under the *Settlement Agreement* and/or who are participating in the MFP program. For example, the Decatur Housing Authority was successful in obtaining 35 MFP vouchers from a HUD competition last year. DCA proposes to work collaboratively with DBHDD and DCH to develop an outreach and education initiative targeted specifically to PHAs. The focus of this effort would be to fully explain the state's goals and responsibilities under both the *Settlement Agreement* and the MFP program and to highlight the specific strategies and collaborative efforts of DCA/DBHDD and DCH to expand housing opportunities for these target populations. DCA would also provide support to these PHAs and be a liaison between them and DBHDD and DCH to help make these efforts successful. To maximize this opportunity to engage other PHAs, DCA proposes to work collaboratively with DBHDD and DCH to develop more concrete policies and action steps to implement the DCA Strategies 1-5 outlined above. Once these interagency policies and action steps have been developed, it may be more feasible to work with local PHAs to replicate these efforts.

E. Summary:

Together these strategies provide DCA and the State of Georgia with a multi-pronged approach to expanding housing for individuals eligible under the *Settlement Agreement* and MFP Demonstration program. By dedicating these resources and collaborating with our partners, DCA reinforces its commitment to assisting Georgia to meet the terms of the *Settlement Agreement* and the opportunities presented in the MFP Demonstration program.

Four Year Summary of Strategic Goal Targets

Strategy	FY2012	FY2013	FY2014	FY2015	TOTAL
1. DCA Housing Choice Voucher Settlement Agreement Set-aside	100	700	700	700	2,200
2. Shelter Plus Care Sponsor-Based Expansion	114	150	105	105	474
3. Section 811 Project Rental Assistance (PRA) Funding	0	150	150	150	450
4. Marketing of Tax Credit Units to Populations with Disabilities	TBD	TBD	TBD	TBD	TBD
5. HOME Tenant Based Rental Assistance	0	25	25	25	75
6. Outreach to other Public Housing Agencies	TBD	TBD	TBD	TBD	TBD
Total Annually:	214	1,025	980	980	3,199

Appendix A: DCA HCV Eligibility Criteria

(As excerpted from the 2012 DCA Housing Choice Voucher Administrative Plan, April 2012)

Chapter 3.

ELIGIBILITY FOR ADMISSION

This chapter defines both HUD's and DCA's criteria for admission and denial of admission to the HCV program. It is DCA's policy to strive for objectivity and consistency in applying these criteria to evaluate the eligibility of applicants. DCA staff will carefully review all information provided by the applicant. Applications will be reviewed without regard to factors other than those defined in this Chapter. Applicants will be provided the opportunity to explain their circumstances, to furnish additional information, if needed, and to receive an explanation of the basis for any decision made by DCA pertaining to their eligibility.

A. ELIGIBILITY FACTORS

To be eligible for participation in DCA's HCV program, applicants must meet HUD's criteria as well as any permissible criteria established by DCA. A family's initial eligibility for placement on the waiting list will be made in accordance with the following factors. Final eligibility will not be verified until the family is selected from the waiting list.

The HUD eligibility criteria are:

- An applicant must be a "family"
- An applicant's income must not exceed the applicable Income Limit
- An applicant must furnish a Social Security number on all family who have been issued one.
- An applicant must furnish proof of birth for all family members.
- An applicant must furnish declaration of citizenship or eligible immigration status
- At least one member of the family must be either a U.S. citizen or eligible immigrant

Restrictions on Assistance to Students Enrolled in an Institution of Higher Education

No assistance shall be provided to any individual who:

- Is enrolled as a student at an institution of higher education, as defined under Section 102 of the Higher Education Act of 1965 (20 U.S.C. 1002);
- Is under 24 years of age;
- Is not a veteran of the U.S. military;
- Is unmarried;
- Does not have a dependent child; and
- Is not otherwise individually eligible, or has parents who, individually or jointly, are not income eligible to receive HCV assistance.

Definitions of Family, Disabled Family, Elderly Family or Near Elderly Family

Family includes, but is not limited to, the following, regardless of actual or perceived sexual orientation, gender identity, or marital status:

- (1) A single person, who may be an elderly person, displaced person, disabled person, near-elderly person, or any other single person; or
- (2) A group of persons residing together, and such group includes, but is not limited to:
 - (a) A family with or without children (a child who is temporarily away from the home because of placement in foster care is considered a member of the family);
 - (b) An elderly family;
 - (c) A near-elderly family;
 - (d) A disabled family;
 - (e) A displaced family; and
 - (f) The remaining member of a tenant family.

Disabled family means a family whose head (including co-head), spouse, or sole member is a person with a disability. It may include two or more persons with disabilities living together, or one or more persons with disabilities living with one or more live-in aides.

Elderly family means a family whose head (including co-head), spouse, or sole member is a person who is at least 62 years of age. It may include two or more persons who are at least 62 years of age living together, or one or more persons who are at least 62 years of age living with one or more live-in aides.

Near-elderly family means a family whose head (including co-head), spouse, or sole member is a person who is at least 50 years of age but below the age of 62; or two or more persons, who are at least 50 years of age but below the age of 62, living together; or one or more persons who are at least 50 years of age but below the age of 62, living with one or more live-in aides.

Gender identity means actual or perceived gender-related characteristics.

Sexual orientation means homosexuality, heterosexuality, or bisexuality.

Household Members

The composition of the family may consist of various members; however, one person is designated as the **Head of Household** and is wholly or partly responsible for paying the rent, and has the legal capacity to enter into a lease under state/local law. Minors who by court

order are legally determined emancipated under state law will be recognized as head of household.

Co-Head: is an individual who is equally responsible for the lease with the Head of Household. A family may have a spouse or co-head, but not both; nor may a co-head qualify as a dependent.

Split Households Prior to Voucher Issuance: When a family on the waiting list splits into two otherwise eligible families due to divorce or legal separation, only one family may retain the family's original placement on the waiting list. If both the new families claim the original placement, DCA's Regional Housing Administrator will determine who is entitled to retain the family's placement on the waiting list in the absence of a court determination. In making his/her determination, the Regional Housing Administrator may consider factors including, but not limited to, the following:

1. Which family unit retains the children or any disabled or elderly members;
2. The role of domestic violence in the split; or
3. Recommendations of social service agencies or qualified professionals.

Multiple Families in the Same Household: If a family consists of two families living together (such as a multi-generation family), the household will be treated as one family unit, with one designated head of household, provided that they applied as a family unit.

Custody of Children: Children who are subject to a joint custody agreement but live with the parent listed on the application at least 51% of the time (i.e., at least 183 consecutive or non-consecutive days of the year) will be considered members of the household.

A court order establishing proof of custody or guardianship may be provided for all minors that are not children of the head of household or another household member. DCA will also accept a power-of-attorney from grandparent caregivers or additional third party verification such as documentation from Department of Family and Children Services.

Household Income

To enter the waiting list and receive a voucher the family annual income cannot exceed the limits for the county of application. For admission to the program the family annual income cannot exceed the limits for the county where the family wishes to live:

1. An extremely low-income family: Gross annual income at or below 30% of area median income
2. A very low-income family: Gross annual income at or below 50% of area median income

3. A low-income family that has been continuously assisted under the 1937 Housing Act (an applicant is continuously assisted if the family has received assistance under any 1937 Housing Act program within 120 days of Voucher issuance; programs include public housing, all HCV programs);
4. A low-income non-purchasing family residing in a HOPE 1 (HOPE for Public and Indian Housing Homeownership) or HOPE 2 (HOPE for Homeownership of Multifamily Units) project;
5. A low-income non-purchasing family residing in a project subject to a homeownership program under 24 CFR 248.173; and
6. A low-income family residing in a HUD-owned multifamily rental housing project when HUD sells forecloses or demolishes the project.

The voucher may be used only where the family's income is within that county's extremely low-income or very low-income range. Income limits for the selected county will be used to determine eligibility.

Applicant families who exercise portability rights must be income eligible within the income limits of the receiving HA under 24 CFR 982.353(d)(3).

Applicants whose gross annual income exceeds the applicable income limit will be denied admission and will be offered an opportunity for an informal review.

Social Security Numbers

Families are required to provide Social Security Numbers for all household members prior to admission to a waiting list. Acceptable evidence of a SSN consists of:

1. An original SSN card issued by the Social Security Administration (SSA); or
2. An original SSA-issued document, which contains the name and SSN of the individual; or
3. An original document issued by a federal, state, or local government agency, which contains the name and SSN of the individual.

DCA may reject documentation of the SSN provided by the applicant or participant for the following reasons:

1. The document is not an original document; or
2. The original document has been altered, mutilated, or not legible; or
3. The document appears to be a forged document.

DCA will explain to the applicant or participant, the reason(s) the document is not acceptable and request the individual to obtain acceptable documentation of the SSN and submit it to DCA within a specified time frame.

Individuals exempt from disclosure:

- Individuals who do not contend to have eligible immigration status.
- Existing program participants as of January 31, 2010, who have previously disclosed their SSN and HUD has determined the SSN to be valid.
- Existing program participants as of January 31, 2010, who are 62 years of age or older, and had not previously disclosed a valid SSN.

Addition of a New Household Member

When a participant request to add a new household member, the participant must disclose the assigned SSN and provide DCA with the documentation referenced above, at the time of such request, or at the time of processing the interim or annual reexamination of family income and/or composition. If the family is unable to provide the required documentation of the SSN, DCA may not add the new household member until the family provides such documentation.

Addition of new household members under the age of 6 and no assigned SSN:

- Individual is included as household member and entitled to benefits. (Alt ID is generated)
- Head of Household is to provide documentation of the SSN within 90 calendar days of the child being added to the household.
 - DCA will refer family to SSA for obtainment of SSN card.
- If the family is unable to disclose and provide evidence of the SSN within 90 calendar days, DCA will grant the family an additional 90-day period to comply with the SSN disclosure and documentation requirement, if DCA determines the family was unable to comply with the requirements due to circumstances that could not have reasonably been foreseen and were outside the control of the family. Examples include but are not limited to: delayed processing of SSN application by SSA, natural disaster, fire, death in family, etc.
- Upon expiration of additional 90-day period, if the family has not complied with the SSN disclosure and documentation requirements, DCA will terminate the family's assistance.

Addition of new household members at least 6 years of age or under the age of 6 and has an assigned SSN:

- The participant must disclose the assigned SSN and provide documentation of the SSN to DCA at the time of the request to add household member or at the time of processing the interim or annual reexamination.
- The new household member cannot be added to the family composition until the family has complied with SSN disclosure and verification requirements.

Proof of Birth

Families are required to provide proof of birth for all household members.

Acceptable forms of documentation include:

- Birth Certificate
- Hospital certificate (affirmation of birth)
- School records
- Records from other agencies
- Passport confirming birth date

For elderly persons who were born before birth certificates were issued:

- Notarized statements from persons outside the household
- Page from family bible

Citizenship or Eligible Immigration Status

In order to receive assistance, a family member must be a U.S. citizen or eligible immigrant. Individuals who are neither may elect not to contend their status. In order to receive assistance, a family member must be a U.S. citizen or eligible immigrant. Each member of the household must execute a signed and sworn affidavit signed under penalty of perjury verifying the applicant's lawful presence in the United States. For each adult, the affidavit must be signed by the adult. For each child, the declaration must be signed by an adult residing in the assisted dwelling unit who is responsible for the child. Household members need only declare his/her citizenship status or verify his/her eligible immigration status once during continuously assisted occupancy. New household members, other than through birth, must submit the declaration at the next interim or annual certification.

Eligible immigrants are persons who are in one of the six immigrant categories as specified by HUD. Those six categories are:

1. A Noncitizen lawfully admitted for permanent residence as an immigrant. This category includes a Noncitizen special agricultural worker who has been granted lawful temporary resident status;
2. A Noncitizen who entered the United States before January 1, 1972 and has continuously maintained residence in the United States since then and who is not

eligible for citizenship, but deemed to be lawfully admitted for permanent residence as a result of an exercise of discretion by the Attorney General;

3. A noncitizen who is lawfully present in the United States who has been granted refugee status or asylum or as a result of being granted conditional entry before April 1, 1980 because of persecution or fear of persecution on account of race, religion or political opinion or because of being uprooted by catastrophic national calamity;
4. A noncitizen that is lawfully present in the United States as a result of an exercise of discretion by the Attorney General for emergency reasons or reasons deemed strictly in the public interest (parole status);
5. A noncitizen who is lawfully present in the United States as a result of the Attorney General's withholding deportation due to a threat to life or freedom; and
6. A noncitizen lawfully admitted for temporary or permanent residence (amnesty).

For the Citizenship/Eligible Immigration requirement, the status of each member of the family is considered individually before the family's status is defined.

Mixed Families:

A family is eligible for assistance as long as at least one member is a citizen or eligible immigrant. Families that include eligible and ineligible individuals are called "mixed families". Such applicant families will be given notice that their assistance will be prorated and that they may request a hearing if they contest this determination.

No Eligible Members:

Applicant families that include no eligible members will be ineligible for assistance. Such families will be denied admission and offered an opportunity for an informal review.

Non-Citizen Students:

Non-citizen students as defined by HUD in the Non-citizen Rule are not eligible for assistance.

Appeals Process:

For this eligibility requirement only, the applicant is entitled to an informal review as provided for participants.

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B. INELIGIBILITY FACTORS

Admission to the Waiting List

Families that fall into the following categories will be permanently barred from entering a waiting list:

1. A family found guilty of program fraud and terminated from a federally assisted housing program;
2. A family member engaged in or threatened abusive behavior toward DCA personnel;
3. A family with individuals convicted of manufacturing or producing methamphetamine (speed);
4. If the preponderance of evidence indicates that a family member has engaged in drug-related criminal activity or violent criminal activity; (If the family member who committed the act is no longer a member of the household, the family may be considered for admission.)
5. A family member is listed as a registered sex offender;
6. A family that provides false information on their application;
7. A family member is listed as a convicted felon for drug-related or violent criminal activity.

Families that fall into the following categories will be barred from entering a waiting list for a period of three years:

1. A family member has been evicted from federally assisted housing for serious lease violations within the previous three years;
2. A family who is terminated from a federally assisted housing program for program abuse.
3. A family member who has a record of arrest for drug-related or violent criminal activity on the premises of a public housing or HCV property within the previous three years.

DCA will make these determinations by implementing the following actions:

- Carry out sex offender registration and conduct criminal background checks in Georgia and in any state (if possible) where the family has resided.
- Be consistent with fair housing and equal opportunity in admission actions.
- Families who are determined to be ineligible will be notified in writing of the reason for denial and offered an opportunity for an informal review.

Admission to the Housing Choice Voucher Program

Families may be admitted to DCA's waiting list, but will not be offered a Housing Choice Voucher if any of the following circumstances or conditions are brought to the attention of DCA staff:

1. If the family fails to submit evidence of citizenship or eligible immigration status.
2. If the family fails to submit verification that they lived/worked in the county which they applied for at the time of application.

Families who are determined to be ineligible will be notified in writing of the reason for denial and offered an opportunity for an informal review (or informal hearing if the denial is due to citizenship or eligible immigration status).

Families will not be admitted to DCA's waiting list if the family owes a debt or has a record of adverse termination from a previous federally assisted housing authority.

The family will have a maximum of thirty (30) days from the date of application to resolve the debt/adverse termination with the previous federally assisted housing authority.

**Appendix B:
Georgia Housing Voucher Program
(GHVP)/Bridge Funding
SFY 2012 Program Description**

Department of Behavioral Health and Developmental Disabilities (DBHDD)

Georgia Housing Voucher Program (GHVP)/Bridge Funding

SFY 2012 Program Description

Purpose

To provide Supported Housing and Bridge Funding to persons with Serious and Persistent Mental Illness in the Settlement Agreement's Target Population. The Supported Housing will assist such individuals in attaining and maintaining safe and affordable housing and support their integration into the community. The program is designed to provide housing supports for approximately 2,000 tenants that are deemed ineligible for any other benefits. Supported Housing includes integrated permanent housing with tenancy rights, linked with flexible community-based services that are available to consumers when they need them, but are not mandated as a condition of tenancy. Bridge Funding is the provision of security and utility deposits, household necessities, living expenses, and other supports during the time needed for a person to become eligible and a recipient of federal disability or other supplemental income.

DBHDD will assign a Georgia Housing Voucher (GHV) to tenants that meet the requirements of the Settlement Agreement. The tenant will authorize DBHDD to pay on their behalf, directly to the property owner, an amount calculated as the lesser between the Fair Market Rent less a regionally calculated Utility Allowance and the rent for a comparable non-GHVP non-assisted unit in the same complex.

The program design ensures that housing is distinct inspected and is from support services. The tenant has the ability to choose potential housing locations.

**DBHDD Administrative
Responsibility**

DBHDD is responsible for administering this rental assistance program for the benefit of tenants with Serious and Persistent Mental Illness and those that are a Covered Tenant in the Settlement Agreement. DBHDD may at any time change, modify, add, or eliminate any policy, procedural step, or administrative process including cancelling the program at DBHDD's sole and absolute discretion.

Policies and Definitions

Accessibility Modifications

Accessibility Modifications made to the housing unit in order to accommodate the physical needs of the tenant is an eligible **Bridge Funding** expense. All accessibility modifications must first receive DBHDD prior approval before entering into a lease or authorizing or commencing any work. In submitting the request, the Current Provider must use GHVP-6; attach a description of the scope of work, Property Owner approval of the work scope, and estimates by a licensed contractor. Every effort should be used by the Current Provider to locate units using www.georgiahousingsearch.org that are already adapted to the tenant's needs.

Bridge Funding Not Linked to GHVP

The DBHDD Regional Offices may accept Bridge funding requests not tied to the GHVP. The residential placement may not be to an independent apartment, but the individual meets all the Tenant Eligibility and Tenant Priority requirements. The Regional Office will receive the request using the GHVP Referral Form and will submit the GHVP-3 v. 2 form for processing in the same manner as those linked to the GHVP. The protocol of the prefix "A" then the region, then sequentially numbered requests will be used.

Bridge Funding Submission & Payment Guidelines

Submissions for reimbursement for Bridge Funding expenses prior to the 15th of the first month will be processed in the second month. Therefore, an eligible Bridge Funding expense would be the initial pro rated rent for month one.

Submissions for reimbursement for Bridge Funding expenses after the 15th of the first month will be processed in the third month. Therefore, an eligible Bridge Funding expense would be the initial pro rated rent for month one and month two rent.

All submissions including third party invoices must be attached to the Bridge Funding Request form (GHVP-3 v.2). Only the initial submission may include the \$500.00 Current Provider Fee. The form must be signed by the Current provider and the tenant.

Bridge Funding Uses

Bridge funding can be used for rent deposits, utility deposits, moving expenses, modifications to private apartments for minor accessibility modifications, modifications for the hearing or sight impaired, initial food and apartment supplies (up to 3 months), household furnishings, minor tenant caused repairs, first month's pro rated rent, second month's rent if submitted after the 15th of the month, and a one time fee of \$500.00 for the Current

Provider to complete the activities under this Program Description.

Only those expenses that are required to establish the household or represent a barrier to stable housing are allowed (e.g. washers, dryers, television sets are not barriers to housing and are not necessary to establish a household and are therefore ineligible Bridge Funding expenses).

Bridge Funding should not be used if the individual is able to provide for those covered expenses on his or her own. The current provider is responsible for making every effort to limit the expenses paid under the Bridge Funding Program with the individual's own resources and those of the community (e.g. furniture banks, charitable contributions). The Current Provider will receive prior approval to spend up to \$3,000.00 on the Tenant's behalf on eligible Bridge funding Expenses. Payment in excess of \$3,000.00 will need prior DBHDD authorization. It is expected that Bridge Funding will not exceed \$3,000.00 per tenant.

All accessibility Modifications must receive prior documented approval even if it is the initial Bridge Funding Request and the total request is less than \$3,000.00.

No Bridge Funding request will be processed after the third month of the lease without DBHDD prior authorization.

Current Provider

The Current Provider is responsible for transitioning a tenant from their current residential placement (e.g. hospitals, homelessness, correctional institutions, crisis stabilization units, and intensive residential treatment settings) into an independent community rental unit with full tenancy rights where tenancy is not coupled with support service compliance or dependent on a support service provider. Choice, central to the program, mandates that the Current Provider offer multiple potential locations that meet program and rent standard guidelines.

**Georgia Housing
Voucher Program
Submission & Payment
Guidelines**

The initial set up for vouchers paid directly by DBHDD will follow the same submission and payment guidelines for the Bridge Funding Program. Submissions received and meet all program guidelines prior to the 15th of every month will be paid in the next subsequent month. Submissions meeting all program guidelines received after the 15th of the month will be set up and paid in the month following.

Copies of the lease, lease addendum (GHVP-2 v. 2), notice of the lease (GHVP-4), HQS inspection form, and the IRS W-9 form for the Current provider and the property owner represent a complete submission package. Unless DBHDD receives a complete package, DBHDD will withhold the voucher's

initial set up.

Lease Holders

Only those listed on the Notice to Proceed can occupy the unit including family members without DBHDD permission. If approved, calculations to determine the tenant's portion of the rent will include any additional tenants' income.

Maximum Rent

The Maximum Rent available to the Property Owner is calculated by utilizing the Fair Market Rent (FMR) Standard (adjusted by the Utility Allowance for the region) as published by HUD from time to time for each county. The Current Provider, assisting the tenant's transition into the community will have the ability, upon prior approval by DBHDD, to allow up to 110% of the FMR (adjusted by the Utility Allowance for the region); if there are no suitable locations in the market area of choice or to reduce the market area's concentration of special needs tenants.

Notice to Proceed

The Notice to Proceed (GHVP-1) issued to the Current Provider is active for 60 days from the notice's date. After 60 days, the DBHDD regional office will cancel the authorization to proceed. Failure on the part of the Regional Office to issue the cancellation cannot be taken to mean that the authorization is still active. DBHDD's Regional Office may reinstate the Notice to Proceed (using the existing Notice to Proceed tracking number) at its sole and absolute discretion no earlier than 60 days after the initial cancellation.

**Notice to Proceed
Allocation Process**

Each DBHDD region will be able to issue 10 new Notices to Proceed on a monthly basis only when the existing Active notices are 25% or less of Signed Leases and Canceled individuals due to expiration of the notices or abandonment of a lease.

**Placement With a
Relative**

DBHDD will consider issuing a voucher benefit to a family member, at its sole and absolute discretion, to accept a transitioning covered tenant, if it is in the best interest of the tenant, at the tenant's request, and is a clinically sound placement. The amount of the voucher payment will be based on an SRO unit, adjusted for locations, less an all-electric utility allowance for an SRO unit. The payment will be sent directly to the property owner.

Recovery Plan

Each prospective tenant must have a Recovery Plan or it's equivalent (e.g. Transition Plan, Individual Treatment Plan) that documents the tenant's desire to live independently, the individual's support service needs, the Current Provider responsible for placing the individual into the community, and the support service provider responsible for on-going supports matched to their needs.

Rent Payment Standard

The Rent Payment Standard of the GHVP is the lesser of the Maximum Rent or the rent for a comparable non-assisted GHVP unit in the same complex.

Tenant Eligibility

DBHDD will solicit potential candidates for the GHVP and the Bridge Funding Programs from a wide range of providers, institutions, and community organizations. All tenants that meet the definition of the "Target Population" in the Settlement Agreement and meet the income requirements are eligible. Selection will be based on current residential status, eligibility and availability for other housing placements or programs, income, desired location's support service capacity, the need for support services, and history of employment, criminal background, and daily living skill analysis. **Income is required to be less than three times the Federal Benefit Rate to qualify for this program.** All selections are at the sole and absolute discretion of DBHDD.

Tenant Priority

DBHDD will provide a priority for those that meet the standards outlined under Tenant Eligibility and those that are transitioning from a state supported hospital or Crisis Stabilization Unit, transitioning from a DBHDD supported intensive residential treatment facility (only when that slot will be occupied by an individual transitioning from a state supported hospital or Crisis Stabilization Unit) and meet the clinical criteria for Assertive Community Treatment services. DBHDD may from time to time change the Tenant Priority at its sole and absolute discretion.

Tenant Responsibility

The tenant is fully responsible for all damages done to the unit, except for normal wear and tear. DBHDD may at its sole and absolute discretion extend Bridge Funding beyond the initial three months, to make repairs to the unit to maintain relationships with property owners or to maintain housing stability. Submissions for this activity will follow the procedures outlined in the "Accessibility Modifications" policy description.

Unit Reservation for Hospitalization or

A GHVP supported unit will only continue to pay for a vacated unit due to hospitalization or for a minor incarceration for up to 30 days. Payments will

Incarceration

cease should the tenant abandoned the property.

Utility Allowance

The Utility Allowance is determined by an all-electric apartment based on the region and unit size as published from time to time by the Georgia Department of Community Affairs. The FMR less the Utility Allowance will be used to determine the Maximum rent payable to the property owner. The Utility Allowances are indicated below for a Single Room Occupancy and a one-bedroom apartment based on the three DCA regions.

North		Middle		South	
SRO	1 BR	SRO	1 BR	SRO	1 BR
\$ 64	\$ 87	\$ 68	\$ 92	\$ 66	\$ 93

Unit Concentration

The Settlement agreement states:

Supported Housing includes scattered-site housing as well as apartments clustered in a single building. By July 1, 2015, 50% of Supported Housing units shall be provided in scattered-site housing, which requires that no more than 20% of the units in one building, or no more than two units in one building (whichever is greater), may be used to provide Supported Housing under this agreement.

Current Providers will inform DBHDD when individuals placed with a Georgia Housing Voucher in an apartment community meets the greater of 20% in one building or two units in one building threshold. DBHDD will track and maintain a list of the total number of units in scattered site housing and the number of units in clustered housing to ensure compliance with the 50% standard.

Voucher Renewal

Every effort should be made by the Current Provider or any subsequent provider of support services to enroll the tenant or place the tenant on federal housing support programs (Housing Choice Voucher Program-Section 8). Upon renewal of the initial lease term, the tenant, having maintained housing stability and a history of making required utility payments (if applicable), will be required to pay 30% of their income towards rent and the Utility Allowance. DBHDD will renew the GHV at its sole and absolute discretion based in part on fund availability. DBHDD is under no obligation to approve an automatic lease renewal.

Voucher Size

Only a Single Room Occupancy or 1 bedroom unit is authorized under the program. However, approval is automatically granted, should a two bedroom unit meeting all the requirements of the GHVP and is equal to or less than the Maximum Rent. Roommates and larger bedroom units may be possible, but will be decided on a case-by-case basis and must be pre-approved by DBHDD at its sole and absolute discretion.

Program Procedures

Initial Set Up

Step 1

Selection

- a. DBHDD Regional Offices will solicit, using the Georgia Housing Voucher Program/Bridge Fund Referral Form (version 2), a list of potential candidates from a broad spectrum of providers.
- b. DBHDD will select tenants deemed most likely to succeed, at its sole and absolute discretion, based in part on the following factors: daily living assessment, ADA target population eligibility criteria, current housing status, income potential, desired location, capacity for support services, employment history, criminal history, fund availability, and tenant priority outlined in the Program Description.
- c. DBHDD will issue a Notice to Proceed (GHVP-1) to the Current Provider or referring agency responsible for transitioning the tenant into the community.
- d. The DBHDD Regional Coordinator will be responsible for issuing the Notice to Proceed. The DBHDD Regional Coordinator will ensure that there is a Recovery Plan in place and that the Current Provider and subsequent provider (if different) are in place with supports matched to the needs of the tenant.
- e. The Current Provider will explain to the tenant the implications and purpose of the Georgia Housing Voucher Program, Rental Payee Agreement (Appendix A), and the increased contribution towards rent at lease renewal if extended by DBHDD.
- f. The Notice to Proceed will include the Name, County of Choice, Voucher Size, Fair Market Rent less Utility Allowance maximum payment to the Property Owner, and an initial authorization for Bridge Funding to the Current Provider of up to \$3,000.00. Reimbursement will be based on submitted invoices and paid on the first of the next month (See Bridge Funding Submission for submission timing and eligible expenses). This Bridge Funding amount can be used to pay for the pro rated first months rent (second month's rent if submitted after the 15th), deposits, and initial household expenses.

Step 2:

Housing Location

- a. The Current Provider will utilize www.georgiahousingsearch.org as the primary source to locate housing. Each Current Provider will register to receive access to unique screens of property owners that have indicated a willingness to rent to special needs populations. The Current Provider will assemble and periodically update a list of all the web site's properties

in the service area (See Appendix B for sample list).

- b. The Current Provider and the tenant will tour potential housing locations and settle on a location that is within the parameters of the county Fair Market Rent less the standard Utility Allowance (See Appendix C for FMR rents by county). The FMR may be exceeded by 110% based on locational needs or to reduce the concentration of special needs tenants.
- c. The Current Provider and the tenant will receive from the property owner an intent to lease (verbally or in writing), an acceptance of the GHVP for the rent paid by DBHDD on behalf of the tenant, and that the lease is conditioned on passing the Housing Quality Standards (HQS) inspection.
- d. A copy of the Lease Addendum (GHVP-2) must be offered to the Property Owner for their review.

Step 3:

HQS Inspection

- a. The Current Provider will perform an HQS inspection using the HUD Inspection Form for the Housing Choice Voucher Program (Appendix D). The provider will also check the location to ensure the unit is not in a flood plain.
- b. DBHDD will require Provider staff training (DBHDD to provide) for those conducting the housing search and completing the HQS inspection form.
- c. An offer of a lease is contingent on passing all elements of the HQS inspection.

Step 4: Lease and Lease Addendum

- a. Using the Maximum Rents provided in the Notice to Proceed (GHVP-1), adjusting for the appropriate Utility Allowance (Property Owner pays all utilities, tenant all utilities), then determining if that rent payment is greater or lesser of the amount paid by other tenants in the same complex, the Current Provider will complete the Lease Addendum (GHVP-2).
- b. The Lease must not conflict with any provisions of the Lease Addendum and the Lease is the normal and customary Lease used by the Property Owner for other non-DBHDD supported units.
- c. The Lease Addendum must be signed at the same time as the Lease with the tenant.
- d. Appendix A must be included as an attachment and incorporated into the Lease Addendum.
- e. The Current Provider will complete all the required information in the Notice of Lease (GHVP-4). The Notice of Lease will be used to set-up the voucher with the Financial Intermediary.

Step 5:

Bridge Funding and Payment to Current Provider

- a. The Current provider will submit GHVP-3 version 2 for reimbursement, including invoices for all allowable Bridge Funding requests as outlined in the GHVP Program Description.
- b. Upon review the DBHDD, DBHDD may disallow any reimbursement, including invoices covered under pre-authorization, if at its sole and absolute discretion the invoice does not meet the Bridge Funding requirements outlined in the GHVP Program Description.
- c. DBHDD will reimburse the Current Provider as outlined in the Bridge Funding Submission policy above.

Step 6: Reporting

- a. The Current Provider will forward directly following executing the lease, a copy of the lease that meets GHVP standards, GHVP Forms 1, 2, 3, invoices for all Bridge Funding expenses, 4, an HQS form showing a passing grade (or that all deficiencies noted will be repaired prior to occupancy), and an **IRS W-9 form for the property owner and Current Provider**. Only a complete package will be processed for funding when sent to the DBHDD Georgia Housing Voucher Program, Program Manager.

Renewal Procedures

- a. Upon renewal of the initial lease term, the tenant will be responsible for completing, with the assistance of ... **To Be Determined**, the GHVP-6 Renewal Income Certification/Rent Determination/Utility Allowance Form. GHVP-6 will determine the amount of rent contribution (less utility allowance) that will be the tenant's responsibility and the amount of the Georgia Housing Voucher Payment on behalf of the tenant. Both parties will sign the form to attest to its accuracy.
- b. The total rent for the unit being paid to the Property Owner must be less than or equal to Part III c of GHVP-2.
- c. The ... **To Be Determined** will also assist in the preparation of a new lease utilizing the same processes as outlined in the Program Procedures including a HQS inspection and the Lease Addendum.
- d. The ... **To Be Determined** will complete and forward with the Lease, Lease Addendum, and HQS inspection a completed HCVP-7, Notice of Change in Payment Standards.

Fiscal Administration

Step A:

Fiscal Intermediary

1. DBHDD will collaborate with a Fiscal Intermediary to provide programmatic support in processing reimbursement for the GHVP and Bridge Funding requests. The Notice of a Lease (GHVP-4) will be used to establish the payments to the Property Owners. The Fiscal Intermediary will pay the property owner on the first of the month.
2. GHVP-3 Bridge Funding Request will be used to establish the reimbursement payments to the Current Provider with attached invoices documenting actual expenses.
3. Process Timeline
 - a. No later than the 15th of every month, the DBHDD GHVP Program Manager will send electronically copies of all current (received by DBHDD from the 16th of the previous month to the 15th of the current month) GHVP-3 and GHVP-4 forms.
 - b. A Monthly Expense Report, signed by the GHVP Program Manager will accompany the new registrations as well as a list of past approved rental assistance commitments.
 - c. The Fiscal Intermediary will review for accuracy based on DBHDD's supplied documentation and then sign and return the Monthly Expense Report within five business days.
 - d. DBHDD Program Manager will process the Monthly Expense Report within 2 business days to the DBHDD accounts payable department.

- e. DBHDD Accounts Payable department will deposit via wire transfer the funds to the Fiscal Intermediary as indicated in the approved Monthly Expense Report.
- f. The Fiscal Intermediary will release the funds as indicated (Property Owners for the GHVP and Current Providers for Bridge Funding) no later than the 1st of every month or 2 days upon receipt of funds from DBHDD.

Step B: Provider Fee

- 1. A fee not to exceed \$500.00 for Bridge Funding will provide compensation for the intended services, payable only upon a signed lease.

Step D:

On-going Administration

- 1. Notice of Lease Cancellation
 - a. The Current Provider and any subsequent provider primarily responsible for support services will be required to notify DBHDD if there is any change to the tenant's residency status.
 - b. Provider will send in GHVP-5, as soon as they become aware that the tenant is no longer occupying the assigned unit.
 - c. DBHDD will notify the Property Owner that the Rental Assistance Payment will end.

Contact Information

DBHDD GHVP Program Manager is Douglas Scott. All program correspondence and required documents can be sent, e-mailed for faxed based on the information below:

Address: GHVP Program Manager
Adult Mental Health Division
2 Peachtree St. NW
Atlanta, GA 30303

Fax: (770) 342-7227

E-Mail: doscott@dhr.state.ga.us