The State of Georgia Draft Consolidated Plan

Federal Fiscal Years (FFY) 2018-2022

Including FFY 2018 Annual Action Plan

& Citizen Participation Plan

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Executive Summary

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1. Introduction

The Georgia Housing & Finance Authority (GHFA) was statutorily created to provide financing and financial assistance for the provision and preservation of safe, decent, energy efficient, and affordable housing, and an adequate system of finance for housing and housing related concerns within Georgia. GHFA's various programs are administered by the Georgia Department of Community Affairs (DCA). The Georgia Department of Community Affairs (DCA) is the lead agency overseeing the implementation of the State of Georgia's Consolidated Plan. Throughout this report, the Georgia Department of Community Affairs (DCA) will herein be referenced as DCA, the State, or the State of Georgia.

The Plan focuses on the use of funds from HUD's five consolidated formula programs – Community Development Block Grant (CDBG), HOME Investment Partnership (HOME), National Housing Trust Fund (NHTF), Emergency Solutions Grant (ESG), and Housing Opportunities for Persons with AIDS (HOPWA). DCA is responsible for the administrative oversight of the five programs covered by this Plan. If HUD funding is consistent, the State of Georgia will receive about $63.6 million annually for each of the years covered by this Plan. This figure includes the approximately $3.5 million that has been allocated to the state through NHTF. This Consolidated Plan covers federal fiscal year (FFY) 2018 beginning July 1, 2018 through FFY2022, which ends June 30, 2022. The Action Plan is for the receipt of FFY2018 funds beginning July 1, 2018 and ending June 30, 2019.

HUD offers a broad range of activities for CDBG, HOME, ESG, HOPWA, and NHTF. CDBG provides resources for community development, which may include acquisition of real property, relocations and demolition; rehabilitation of residential and nonresidential structures; construction of public facilities and improvements; public services, activities relating to energy conservation and renewable energy resources; and provision of assistance to local governments to help locate new or expand existing business and industry and job creation/retention activity. HOME is used for single-family and multifamily housing activities, which may include providing home purchase or rehabilitation financing assistance to eligible homeowners and new homebuyers; building or rehabilitating housing for rent or ownership for eligible households; and tenant-based rental assistance to subsidize rent for low-income persons. ESG funds projects which may include supportive services to homeless individuals and households, emergency shelter, homelessness prevention assistance, and permanent housing for the homeless population. HOPWA is dedicated to the housing and supportive service needs of people living with HIV/AIDS and their families, which may include acquisition, rehabilitation, or new construction of housing units, facility operations; rental assistance; short-term payments to prevent homelessness; case management, substance abuse treatment; mental health treatment; nutritional services; job training and placement assistance; and assistance with daily living. NHTC provides resources for activities housing extremely low-income households, including construction for rental or ownership. A portion of the funds may be used to provide operating support for rental housing.

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This Plan identifies which of HUD's eligible activities have been prioritized as best able to serve the needs of Georgia in each of the five programs. It includes information about the overall goals and objectives for the coming year with a description of available resources and proposed actions to address the identified needs. In addition, the Plan includes information about the specific activities and allocation of available resources for the federally funded programs covered in the Action Plan.

The plan format is dictated by the federal online HUD Integrated Disbursement and Information System (IDIS). Georgia is required to use IDIS to create its Consolidated Plan, Annual Action Plans, and Consolidated Annual Performance and Evaluation Reports (CAPERs). The questions and many of the tables are automatically created by IDIS. The data collected from IDIS on each performance measure is reported annually in the CAPER and submitted to HUD by September 30. DCA's previously submitted CAPERs are available on the DCA website.

2. Summary of the objectives and outcomes identified in the Plan Needs Assessment Overview

Housing Cost Burden Relief: The most common housing problem was moderate to severe cost burden, especially for households with incomes below 30% of the area median income. More than one-third of Georgia residents are cost burdened. The Needs Assessment also finds that persons with disabilities and/or special needs have specific barriers to housing including lower income and the need for accessible housing. Seniors are also impacted by the lack of affordable housing. Additionally, African-American and Hispanic households are disproportionately or severely cost-burdened. The percentage of African-American and Hispanic households experiencing disproportionate or severe housing cost burden is more than 10% higher than the percentage of households in the state as a whole. The Plan identifies priority needs for affordable housing including production of new units, acquisition of existing units, rehabilitation of housing and rental assistance to alleviate the housing cost burden for Georgia residents.

Homelessness: Homelessness affects an array of communities in Georgia, both urban and rural. Persons living with HIV/AIDS are more vulnerable to becoming homeless. The Plan identifies priority needs to serve persons with HIV/AIDS such as rental assistance, supportive services for persons with HIV/AIDS, rapid rehousing, and homelessness prevention.

Non-Homeless Supportive Services: Georgia needs increased services for persons with HIV/AIDS and non-homeless supportive services.

Aging Infrastructure, Local Disinvestment: The assessment finds a large demand for community infrastructure, including water and wastewater systems as well as public facilities and services. The State is committed to engaging in increased efforts to provide for the viability of communities by creating and sustaining quality infrastructure and improving livability, health and safety, and economic development.

3. Evaluation of past performance

The State's success in achieving its goals and objectives using the funds available is analyzed in detail in the State's CAPER. The CAPER Performance Table in the Appendix shows performance statistics by

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objective for FY2015 and FY2016 as reported on the State's FY2016 CAPER. Because NHTF is a new program for 2016, past performance information for this program is not available.

Below are highlights of performance and accomplishments for 2016:

- DCA expected 510 rental units to be constructed or rehabilitated using HOME and NHTF dollars during the program year. The number of actual units constructed or rehabilitated totaled 869.
- The number of Georgia residents assisted through either homelessness prevention assistance or non-homeless special needs programs using ESG and HOPWA funds totaled 1,016 individuals. This is up dramatically from the goal of 620 individuals.
- CDBG funds were expertly leveraged as infrastructure projects expected to impact 9,000 individuals have been able to assist 12,240 Georgia residents.

4. Summary of citizen participation and consultation process

In preparation of the 2018-2022 Consolidated Plan, DCA conducted a three-pronged, holistic outreach process that resulted in consultation with stakeholder organizations and entities, residents, and a public hearing. Prior to publishing the draft Consolidated Plan, DCA coordinated 21 focus group discussions at stakeholders' meetings, 5 DCA-organized discussions with stakeholders, 4 stakeholder surveys, 16 resident discussions, 2 resident surveys and 1 public hearing.

Stakeholder Outreach

Stakeholder outreach involved meetings with the following service coalitions and task forces: Brunswick Homeless Coalition, Liberty County Homeless Coalition, Harris County Homeless Coalition, Okefenokee Alliance for the Homeless, Macon Re-Entry Coalition, Hartwell/Hart County Housing Task Force, Liberty County Family Connection, Tri-County Family Connection Collaborative, and the Homeless Resource Network. Recurring themes of needs for affordable housing, increased services for individuals with mental health challenges, and increased support for families and individuals with children were identified during these meetings with service providers and task forces.

Georgia Initiative for Community Housing (GICH) teams also provided input during this outreach process. Consulted GICH communities include: Millen, Warrenton, Gray-Jones County, Liberty County, Perry, Dublin, Sylvester, Warner Robbins, and Albany. The increased need for affordable housing identified by the service coalitions was echoed by the GICH team leaders and meeting attendees. Additionally, these communities are encountering issues with veterans and the Veterans Administration (VA), maintenance and renovation needs for single-family homes, and issues with DCA administrative policies and protocols.

Local government planning groups consulted include: Macon, Georgia; Macon County, Georgia; Southern Georgia Regional Commission, Agency on Aging; and the Southwest Georgia Regional Commission, Regional Partners Network. These stakeholders identified affordable housing, homelessness, heir property issues, and the need for the tailoring of assistance and technical programs to fit the unique needs of rural places as major themes framing the issues affecting the communities they service.

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In addition to coordinating meetings with the organizations previously discussed, DCA held two Regional Consolidated Plan Discussions and an ESG/HOPWA Roundtable. The Regional Consolidated Plan Discussions were held in Valdosta and Dublin, Georgia. The Valdosta meeting exposed a need for increased assistance with homeless and veteran populations while the focus of the Dublin meeting centered on affordable housing program implementation and administrative barriers. The ESG/HOWA Roundtable was held in Atlanta, Georgia. At this roundtable transportation, housing (specifically housing for the children of clients), and expansion of supportive services were established as funding priorities. The Qualified Allocation Plan Application Workshop responses highlighted difficulties developers have with coordinating and funding.

The last piece of the stakeholder outreach component involved surveys. Participants in two DCA hosted webinars (one general and one CDBG-specific) and attendees of the stakeholder partner, GICH, and local government planning group discussions were invited to complete surveys and submit questions and comments to DCA. Additionally, relevant stakeholders were invited to complete surveys inquiring about the state of broadband access, broadband literacy, hazard mitigation, and resiliency efforts in the state.

Resident Outreach

Resident outreach was the second arm of DCA's three-part outreach triangle and consisted of LIHTC, PHA, and ESL focus groups, LIHTC resident surveys, and ESG/HOPWA surveys.

The LIHTC focus group participants included residents of DCA funded Shoal Creek Manor (Henry County), Hope House (Richmond County), Grace Crossing (Bulloch County), Ashley Woods Apartments (Henry County), Royal Oaks (Liberty County), Antigua Place Phase 1 (Colquitt County), Paradise Estates (Worth County), Brentwood Place (Monroe County), Courtes de Emerald (Decatur County), and Savannah Gardens (Chatham County). Feedback was also garnered from a CBDG Pre Application Public Hearing at which the main focus was property adjacent to a PHA and other housing issues. PHA focus groups included the Atlanta Housing Authority and Calhoun Housing Authority. These focus groups identified increasing affordable rental housing for low-income families, increasing senior housing with support services, and supportive housing for women and children as the primary housing needs of their communities. Transportation and housing development near community services were also flagged as important themes.

The International Rescue Committee (IRC) of Atlanta assisted DCA in Limited English Proficient (LEP) and refugee outreach efforts. A meeting of refugees led by an IRC representative identified quality multi-family rental options and supportive housing for individuals experiencing homelessness as the predominant themes of the discussion. Mentioned barriers to needs being meet included: high rents, large rental deposits, inefficient utility systems, and language/communication barriers with landlords.

Resident outreach also consisted of two surveys. A Resident survey garnered one hundred and thirty responses. An ESG/HOPWA Recipient Survey was distributed amongst seventy organizations and entities.

Public Hearing

A public hearing made up the third leg of DCA's outreach stool. At the January 25, 2018 public hearing, DCA presented initial needs assessments analysis, received stakeholder and resident feedback and proposed strategies and actions for affirmatively furthering fair housing. Discussion topics at the public hearing included: jurisdictional inclusion in specific programs, budget allocations, congressional appropriations, increased support for supportive housing and housing for extremely low-income individuals, support for DCA's home access program, support for disabled foster youth aging out of foster care, recommendations to increase low-income homeowner opportunities, and recommendations to strengthen fair housing and equal opportunity in housing in Georgia. Invoices from the Georgia Newspaper Service, Inc. in the Appendix demonstrate that the State ran Spanish and English Public Notices for the January 25, 2018 Public Hearing.

5. Summary of public comments

Public comments emphasized the need for increased investment in affordable housing production, homeless service provision, non-homeless special needs service provision, and community development. Comments can be found in their entirety in the Consolidated Plan Outreach Report which is both attached to and incorporated into this plan.

6. Summary of comments or views not accepted and the reasons for not accepting them

Comments that were not related to the purposes of this plan and specifically mentioned one or more specific individuals by name were not accepted. As an example, one response to one question of the Resident Survey negatively targeted a local elected official.

7. Summary

The 2018-2022 Consolidated Plan covers the receipt of funds by the State of Georgia for five HUD programs. The three objectives of the programs relate to the provision of decent, affordable housing; the provision of a suitable living environment; and the expansion of economic opportunities. The development of activities and programs outlined in the Plan are a result of the analysis of market conditions and an assessment of needs along with feedback received from the public and other stakeholders as to unmet needs in the state in these areas. An extensive effort was conducted to gather feedback from these individuals and groups along with reviewing past performance prior to determining the activities to be undertaken and the allocation of funding to these activities.

The Process

PR-05 Lead & Responsible Agencies 24 CFR 91.300(b)

1. Describe agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Table 1 – Responsible Agencies

Agency Role	Name	Department/Agency
CDBG Administrator	GEORGIA	Georgia Department of Community Affairs
HOPWA Administrator	GEORGIA	Georgia Housing & Finance Authority
HOME Administrator	GEORGIA	Georgia Department of Community Affairs
NHTF Administrator	GEORGIA	Georgia Housing & Finance Authority
ESG Administrator	GEORGIA	Georgia Housing & Finance Authority

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- **ESG & HOPWA**: David Whisnant, Director, Office of Homeless & Special Needs
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PR-10 Consultation - 91.110, 91.300(b); 91.315(l)

1. Introduction

DCA recognizes that leveraging of its CPD resources is required to successfully address the housing and service needs of Georgia's citizens. As a result, DCA works closely with a number of different organizations and advocacy groups throughout the state, to identify gaps in services and housing needs and to formulate solutions to fill those gaps. Ongoing communication and consultation with these groups is critical to improving program delivery to Georgia residents.

As discussed in ES-05, the State utilized a variety of methods to engage with its stakeholders. Engaging with 342 stakeholder participants, DCA led group discussions at 22 stakeholders' meetings across Georgia and hosted five regional and online events. DCA also created online stakeholder surveys to allow all interested stakeholders to provide input and feedback regarding the consolidated formula programs generally as well as efforts specifically targeting HOME, NHTF, the digital divide, hazard mitigation, and resiliency. Information about the surveys was sent out via e-mail to developers, local governments, grant administrators, nonprofit organizations, advocacy groups, and providers of housing/services to the homeless. DCA received and reviewed 424 responses to the stakeholder surveys as a part of the development of this Plan.

Provide a concise summary of the state's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(l))

The State encourages participation among housing professionals, nonprofit agencies, local government entities, and service agencies in the development of its Consolidated Plan and subsidiary documents to ensure coordination between housing providers and health and service agencies. The State solicits feedback during the comment phase of each plan by posting information on the DCA website. Information is also shared through different listservs and contact data bases. The State holds regular meetings with State agencies servicing populations with special needs including the Georgia Department of Behavioral Health and Developmental Disabilities, the Department of Community Health, the Department of Human Services, and the Division of Aging Services. The State also solicits feedback from public housing authorities through outreach to the Georgia Association of Housing and Redevelopment Authorities (GAHRA) and the Council of Large Public Housing Authorities (CLPHA).

DCA prioritizes positive health outcomes through its housing strategies.

In collaboration with other state agencies, DCA has initiated several efforts to promote the goal of community integration for persons with disabilities. DCA engaged the services of the Technical Assistance Collaborative, Inc. during 2011 to assist DCA in formulating a Strategic Housing Plan for Individuals with Disabilities that focused solely on improving integrated housing options for persons with severe and persistent mental illness covered by the Settlement Agreement and persons that are covered under the Georgia Department of Community Health, Money Follows the Person Demonstration Grant.

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Through this strategic planning effort and working with the Georgia Department of Behavioral Health and Developmental Disabilities, the Department of Community Health, the Department of Human Services, and the Division of Aging Services, DCA anticipates the creation of community integrated housing opportunities for a substantial number of households included in these targeted populations. This effort also established a regular Steering Committee for state agency leaders to collaborate on plan implementation, remove impediments, and conduct discussions regarding new partnerships to contribute to this initiative.

DCA has established a Tenant Selection Preference with its Housing Choice Voucher Program that will help to provide a remedial measure to meet the requirements delineated in the Settlement Agreement. This preference will create immediate access to housing choice vouchers (HCVs) for persons with severe and persistent mental illness. Many of these persons are currently institutionalized or may be at risk of institutionalization. This groundbreaking policy approved by HUD is the first of its kind in the nation and will allow DCA to provide integrated housing options for eligible individuals.

DCA prioritizes the integration of health services in HOME-supported developments through the Qualified Allocation Plan (QAP). Required services and amenities include health provisions, while the competitive scoring criteria encourages developers to incorporate additional healthy housing measures in LIHTC and HOME developments.

DCA has also partnered with the Kresge Foundation to fund an innovative health program with Public Housing Authorities participating in HUD's Rental Assistance Demonstration Program. Partners in both public health and green building will lead several PHAs across the state through an interactive peer-learning academy and provide pre- and post- rehabilitation data tracking to show the benefits for tenants of healthy green building and enhanced health services. DCA is the HOME lender, the Housing Tax Credit provider, and the organizing entity of this effort.

Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness

The State of Georgia is the non-entitlement ESG recipient, hereafter referred to as the State. Overall, the State and Continuum of Care's (CoC) primary intervention to end all forms of homelessness is to maximize the use of the Rapid Re-Housing intervention. DCA continues to prioritize funds available for Rapid Re-Housing every year after consultation with the Balance of State CoC and the other eight CoCs throughout the state. CoC funded programs are encouraged to address the needs of the vulnerable groups listed above as well as other homeless groups.

The State and CoC will work together to complement this intervention with Rental Assistance and Permanent Supportive Housing throughout the CoC.

Additionally, DCA has implemented a harm reduction and support services program to complement its Shelter Plus Care permanent supportive housing program to ensure those who receive housing are able to obtain services necessary to remain stable in that housing

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Describe consultation with the Continuum(s) of Care that serves the state in determining how to allocate ESG funds, develop performance standards and evaluate outcomes, and develop funding, policies and procedures for the administration of HMIS

The State of Georgia staff hosts annual discussions with the other Georgia Continuua of Care (CoCs) concerning the needs of each Continuum. Stakeholders such as the CoC lead, and local government officials and nonprofit organizations serving the homeless give input into how the State sets priorities for annual funding allocations. The State awards points for ESG applications according to each Continuum's ranking of eligible project types as a "high", "medium" or "low priority."

In addition, the State of Georgia staff meets with CoC and ESG Entitlement leads from across Georgia, to discuss ESG implementation and to review interventions that serve the homeless. Prior to the development of this Consolidated Plan the State coordinated a meeting specifically for the Continuum leads within the Balance of State to review performance measures that were being implemented, including a review of benchmarks to be established. State ESG staff noted and reviewed all input received and revised the performance measurements accordingly.

The State continues its consultation with both CoC leads and stakeholders through a series of meetings, technical assistance, and webinars to review plans from the eight ESG entitlement areas, particularly around the increased implementation of Rapid Re-Housing.

The Georgia Homeless Management Information System (HMIS) Project is a statewide collaborative effort to implement HMIS across eight of the nine Georgia Continuums of Care. The Department of Community Affairs is the Lead Agency for the Georgia HMIS Implementation. The HMIS Steering Committee is made up of representatives from each of the eight participating Continuums of Care, the DCA HMIS Project Manager, and Eccovia (DCA's system administrator) staff. The role of the Steering Committee is to oversee the HMIS implementation and assist in setting direction and implementing policy.

As lead agency, DCA is responsible for soliciting feedback from agencies and stakeholders and communicating that feedback to the Steering Committee. Within this, DCA addresses funding priorities, operating policies and procedures and operational issues. DCA, as the lead agency, also runs monthly meetings for all CoC leads, as well as an HMIS user conference in which both State ESG staff and Continuum staff are present and lead discussions.

2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdictions consultations with housing, social service agencies and other entities

When preparing the Consolidated Plan, DCA actively consults with nonprofits; local, regional, and state government agencies; public housing authorities; and community leaders concerned with providing housing, health and social services to Georgia residents. Consultation occurs through regional and interest forums, interviews with organizations, on-line events, comments received at conferences, and incorporation of data and reports produced by consulting organizations.

1	**Agency/Group/Organization**	Georgia Continua of Care
	Agency/Group/Organization Type	Continuum of Care
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Homeless Needs Non-Homeless Special Needs
	How the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	All Continuums in the State were contacted via meeting and forum invitations and surveys. DCA maintains continuous contact with all State CoCs
2	**Agency/Group/Organization**	CDBG Recipients
	Agency/Group/Organization Type	County Government Local Government
	What section of the Plan was addressed by Consultation?	Housing Needs Assessment Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy
	How the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	CDBG recipients were contacted via meeting and forum invitations and surveys. DCA maintains continuous contact with CDBG recipients.
3	**Agency/Group/Organization**	Community HOME Investment Program (CHIP) Grantees
	Agency/Group/Organization Type	Housing County Government Local Government
	What section of the Plan was addressed by Consultation?	Housing Needs Assessment
	How the Agency /Group /Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	CHIP grantees were contacted via meeting and forum invitations and surveys. DCA maintains continuous contact with CHIP grantees.
4	**Agency/Group/Organization**	ESG Entitlement Jurisdictions
	Agency/Group/Organization Type	County Government Local Government
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Homeless Needs -Chronically Homeless -Families w/ Children - Veteran - Unaccompanied Youth HOPWA Strategy

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	How the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	ESG entitlement jurisdictions were contacted via meeting and forum invitations and surveys. DCA maintains continuous contact with ESG entitlement jurisdictions.
5	**Agency/Group/Organization**	Private Nonprofit Organizations
	Agency/Group/Organization Type	Housing Services -Children -Elderly Persons -Persons w/ Disabilities -Victims of Domestic Violence -Homeless -Persons w/ HIV/AIDS -Health -Education -Employment -Fair Housing
	What section of the Plan was addressed by Consultation?	Housing Needs Assessment Homelessness Strategy Homeless Needs -Chronically Homeless -Families w/ Children -Veterans -Unaccompanied Youth Non-Homeless Special Needs HOPWA Strategy Market Analysis Anti-Poverty Strategy
	How the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Private nonprofit organizations were contacted via meeting and forum invitations and surveys. DCA maintains continuous contact with private nonprofit organizations.
6	**Agency/Group/Organization**	Private Developers
	Agency/Group/Organization Type	Housing
	What section of the Plan was addressed by Consultation?	Housing Needs Assessment Market Analysis Services
	How the Agency /Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Private developers were contacted via meeting and forum invitations and surveys. DCA maintains continuous contact with private developers.

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7	**Agency/Group/Organization**	State Government Agencies
	Agency/Group/Organization Type	State Government
	What section of the Plan was addressed by Consultation?	Services Economic Development
	How the Agency /Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	State government agencies were contacted via surveys. DCA maintains continuous contact with State government entities

Table 1 – Agencies, groups, organizations who participated

Identify any Agency Types not consulted and provide rationale for not consulting

DCA made a concerted effort to consult with all stakeholders and resident populations as required by HUD.

Other local/regional/state/federal planning efforts considered when preparing the Plan

Table 2 – Other local/regional/federal planning efforts

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Balance of State Continuum of Care	Department of Community Affairs	Establishing ESG priorities and funding allocations.
ESG Entitlements	Varies by location	Establishing ESG funding priorities.
Georgia Planning and Advocacy Council	Department of Public Health	Establishing HOPWA priorities.
Capital Needs of Georgia's Cities, 2018-2022	Georgia Municipal Association	Establishing CDBG priorities

Describe cooperation and coordination among the State and any units of general local government, in the implementation of the Consolidated Plan (91.315(l))

Each year the State collaborates with ESG Entitlement jurisdictions and other CoCs to set goals and priorities to reduce the number of persons experiencing homelessness. The State anticipates increased collaboration with local consolidated planning jurisdictions in working towards reducing homelessness throughout Georgia. Through the Point in Time Count, the Balance of State CoC will be able to further clarify populations of homelessness within each jurisdiction, which will assist in local homelessness strategies.

The State also works with local governments through the Community HOME Investment Program (CHIP) and CDBG Annual Competition, which allows local governments to be subrecipients of funds to carry out housing, public facility, infrastructure, and economic development initiatives.

DCA has partnered with the University of Georgia and the Georgia Municipal Association to create the Georgia Initiative for Community Housing ("Initiative" or "GICH") which offers communities a three-year

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program of collaboration and technical assistance related to housing and community development. The objective of the initiative is to help communities create and launch a locally based plan to meet their housing needs.

Narrative (optional):

In addition to coordinating with public agencies, DCA collaborates and consults with a number of affordable housing industry groups and service providers. Staff participates in the activities the Georgia State Trade Association of Nonprofit Developers (G-STAND), the Housing Assistance Council, and the Georgia Affordable Housing Coalition (GAHC). G-STAND and the Housing Assistance Council advocate for more low-income housing assistance and increased assistance to CHDOs and other nonprofit developers. GAHC is a group of for-profit developers, funders, attorneys, engineers, architects, and others involved in affordable housing development. Other groups that DCA collaborates with include local governments, public housing authorities throughout the state, the Center for Financial Independence and Innovation, the Brain and Spinal Injury Trust Fund Commission, Concrete Change, disABILITY Link, the Disability Resource Center, the Georgia Department of Labor/Vocational Rehabilitation, the Georgia Advocacy Office, Atlanta Legal Aid, the Atlanta Neighborhood Development Partnership, the Georgia Mental Health Consumer Network, Habitat for Humanity affiliates across the state, the Georgia Division of Family and Children Services, the Statewide Independent Living Council, the Mental Health Planning Advisory Council, Metro Fair Housing Services, the Georgia Supportive Housing Association, and the Supportive Housing Committee of the Atlanta Regional Commission, as well as a number of other housing and community development nonprofit organizations.

PR-15 Citizen Participation - 91.115, 91.300(c)

1. Summary of citizen participation process/Efforts made to broaden citizen participation Summarize citizen participation process and how it impacted goal-setting

Resident outreach was an integral arm of DCA's three-part outreach triangle and consisted of LIHTC, PHA, and Limited English Proficiency (LEP) focus groups and resident and client surveys. DCA staff also led a discussion at a local public hearing for the proposed use of CDBG funds.

The LIHTC focus group participants included residents of DCA-funded Shoal Creek Manor (Henry County), Ashley Woods Apartments (Henry County), Grace Crossing (Bulloch County), Hope House (Richmond County), Royal Oaks (Liberty County), Antigua Place Phase 1 (Colquitt County), Paradise Estates (Worth County), Brentwood Place (Monroe County), Courtes de Emerald (Decatur County), and Savannah Gardens (Chatham County). PHA focus groups included the Atlanta Housing Authority and Calhoun Housing Authority. These focus groups identified increasing affordable rental housing for low-income families, increasing senior housing with support services, and supportive housing for women and children as the primary housing needs of their communities. Transportation and housing development near community services were also flagged as important themes.

The International Rescue Committee (IRC) of Atlanta assisted DCA in LEP refugee outreach efforts. A meeting of refugees led by an IRC representative identified quality multi-family rental options and supportive housing for individuals experiencing homelessness as the predominant themes of the discussion. Mentioned barriers to needs being meet included: high rent, large rental deposits, inefficient utility systems, and language/communication barriers with landlords.

Resident outreach also consisted of two surveys. A Resident survey garnered one hundred and thirty responses. An ESG/HOPWA Recipient Survey was distributed amongst seventy organizations and entities and gathered 47 responses.

A public hearing made up the third leg of DCA's citizen outreach stool. At this meeting DCA presented initial needs assessments, received stakeholder and resident feedback and proposed strategies and actions for affirmatively furthering fair housing. Discussion topics at the public hearing included: jurisdictional inclusion in specific programs, budget allocations, congressional appropriations, increased support for supportive housing and housing for extremely low-income individuals, support for DCA's home access program, support for disabled foster youth aging out of foster care, recommendations to increase low-income homeowner opportunities, and recommendations to strengthen fair housing and equal opportunity in housing in Georgia.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL
1	DCA Presentations at Partner Meetings	Stakeholders	272 attendees at 22 stakeholders' meetings	Comments are summarized in sections ES-05, PR-10, and Appendix.	N/A	N/A
2	DCA-held Consolidated Plan discussions	Stakeholders	66 participants in 5 DCA-held events	Comments are summarized in sections ES-05, PR-10, and Appendix.	N/A	N/A
3	Stakeholder Survey	Stakeholders	416 responses, received via SurveyMonkey from 10/18/17-1/31/18	Comments are summarized in sections ES-05, PR-10, and Appendix.	N/A	N/A
4	Specialized Stakeholder Survey	Targeted group of Stakeholders, including those seeking to address the digital divide, climate change	8 responses, received via SurveyMonkey and in-person half-sheets, from 2/21-3/5/18	Comments are summarized in sections ES-05, PR-10, and Appendix.	N/A	N/A
5	Resident Focus Groups	LIHTC Resident and Recipients of Rental Assistance	124 residents at 10 LIHTC/HOME developments	Comments are summarized in sections ES-05, PR-15, and Appendix.	N/A	N/A
6	Resident Focus Groups	PHA Residents	30 residents at 2 PHAs	Comments are summarized in sections ES-05, PR-15, and Appendix.	N/A	N/A
7	Resident Focus Groups	LEP & Refugee Populations	41 refugees at 3 ESL classes	Comments are summarized in sections ES-05, PR-15, and Appendix.	N/A	N/A
8	Resident Focus Groups	Residents of Area to be Served by CDBG Funds	1 resident at 1 hearing	Comments are summarized in sections ES-05, PR-15, and Appendix.	N/A	N/A
9	Resident Survey	Residents	130 responses, received via SurveyMonkey from 10/18/17-1/31/18	Comments are summarized in sections ES-05, PR-15, and Appendix.	One comment negatively targeted local elected official.	N/A
10	ESG/HOWPA Client Survey	HOPWA/ESG Clients	47 responses, received from 1/18/18-2/1/18	Comments are summarized in sections ES-05, PR-15, and Appendix.	N/A	N/A
11	Public Hearing	Non-targeted/ broad community	12 attendees on 1/25/18	Comments are summarized in sections ES-05 and Appendix.	N/A	N/A

Table 3 – Citizen Participation Outreach

Needs Assessment

NA-05 Overview

Needs Assessment Overview

Data from the 2010-2014 Comprehensive Housing Affordability Strategy (CHAS) Data Query Tool shown in Table 6 indicates that there are a total of 1,446,160 Georgia households with total incomes not greater than 80% of the Housing Area Median Family Income (HAMFI), which represents 41% of all Georgia households. Of these households, 11.7% have at least one household member age 62 or older.

Tables 7 through 11b show the housing problems experienced by households at or below 80% of HAMFI for homeowners and renters. Substandard housing afflicts 22,915 households at or below 80 % of HAMFI, although this number represents a small percentage of state households overall. Overcrowding is an issue for 50,040 renter and owner households below 80% of HAMFI but this has increased to 3.4% of all households in the state with total incomes not greater than 80% of the HAMFI.

The overwhelming problem faced by low- and moderate-income households throughout Georgia is cost burden, where renters and homeowners are paying more than 30% of their income toward housing costs. A total of 265,358 renter households pay more than 30% of their income toward housing-related expenses. Out of those 265,358 households, 92% pay in excess of 50% of their income for housing-related expenses. The number of homeowners paying more than 30% of their income towards housing-related expenses is 330,445. Of this total, 86% pay in excess of 50% of their income for housing-related expenses. Elderly homeowners face significant cost burden pressures, leaving them less likely to have the funds needed to maintain their homes properly as their limited income goes towards mortgages, property taxes, insurance, and utilities.

Housing problems fall into one of four categories: lacks kitchen or complete plumbing, severe overcrowding, severe cost burden, or more than one person per room. The number of households experiencing one or more housing problems is far greater for those at the lowest income levels, particularly those below 50% of area median incomes. At 51% of area median incomes, over half of renter households have at least one or more of the four housing problems. Moderate or severe housing problems related to overcrowding, cost burdens, or having complete facilities appears to be more prevalent for Asian, Pacific Islander, and Hispanic households.

Considering the housing cost burden factor, Table 20 outlines the income factors, races and ethnicities predominately affected. Approximately 66.3% of the households in Georgia are not cost burdened. African-American and Hispanic households are disproportionately cost burdened or severely cost burdened. The percentage of African-American and Hispanic households experiencing disproportionate or severe house burdened problems is more than 10% higher than the percentage of households in the state as a whole.

No data is included in this section on public housing as the State of Georgia does not own or manage any public housing units.

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NA-10 Housing Needs Assessment - 24 CFR 91.305 (a,b,c)

Summary of Housing Needs

Table 5 - Housing Needs Assessment Demographics

Demographics	Base Year: 2010	Most Recent Year: 2014	% Change
Population	9,687,653	9,907,756	2.27%
Households	3,585,584	4,114,496	14.75%
Median Income	N/A	$49,620	N/A

Data Source: 2010 Census (Base Year), 2010-2014 ACS (Most Recent Year)

As defined by HUD, HAMFI stands for "HUD Area Median Family Income". It is the median family income calculated in each jurisdiction to determine Fair Market Rents. This assists in the administration of Local and Federal housing programs based on income limits.

Table 6 - Total Households Table

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households *	459,780	408,625	577,755	347,570	1,746,955
Small Family Households *	166,715	149,420	235,220	153,700	943,680
Large Family Households *	41,840	36,485	56,000	32,290	148,825
Household contains at least one person 62-74 years of age	70,640	39,645	121,860	68,360	344,345
Household contains at least one person age 75 or older	44,060	85,540	66,585	32,815	106,810
Households with one or more children 6 years old or younger *	101,095	59,485	105,935	60,145	270,720
* the highest income category for these family types is >80% HAMFI					

Data Source: 2010- 2014 CHAS

Housing Needs Summary Tables

HUD defines housing problems as having one or more of the following: 1) housing unit lacks complete kitchen facilities; 2) housing unit lacks complete plumbing facilities; 3) household is overcrowded; or 4) household is cost-burdened.

1. Housing Problems (Households with one of the listed needs)

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	Renter						Owner					
	0-30% HAMFI	>30-50% HAMFI	>50%-80% HAMFI	>80-100% HAMFI	>100% HAMFI	Total	0-30% HAMFI	>30-50% HAMFI	>50%-80% HAMFI	>80-100% HAMFI	>100% HAMFI	Total
Number of Households												
Substandard Housing – Lacking complete plumbing or kitchen facilities	6,450	3,995	3,650	1,850	3,525	19,470	2,115	1,745	1,900	1,210	4,850	11,820
Severely Overcrowded – With >1.51 people per room (and complete kitchen and plumbing)	4,475	3,785	2,930	1,355	2,265	14,810	675	780	1,240	605	2,230	5,530
Overcrowded – with 1.01-1.5 people per room (and none of the above problems)	12,970	10,200	9,495	3,540	5,980	42,185	2,615	3,365	5,230	2,625	8,135	21,970
Housing costs burden greater than 50% of income (and none of the above problems)	89,060	69,475	54,570	14,110	17,500	244,715	181,400	80,950	19,495	1,685	1,170	284,700
Housing costs burden greater than 30% of income (and none of the above problems)	21,615	85,220	117,425	27,310	13,815	265,385	19,750	44,275	93,260	58,585	114,575	330,445
Zero/negative Income (and none of the above problems)	44,560	0	0	0	0	44,560	24,330	0	0	0	0	24,330

Table 7 – Housing Problems Table

Data Source: 2010 – 2014 CHAS

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Table 8 – Housing Problems

	Renter						Owner					
	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100 HAMFI	**Total**	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100 HAMFI	Total
Number of Households												
Having 1 or more of four housing problems	226,905	184,145	152,990	35,740	26,750	**626,530**	114,220	119,640	156,200	77,135	147,290	**614,485**
Having none of the four housing problems	33,815	37,385	107,260	95,005	324,135	**597,600**	15,950	67,455	161,305	139,695	1,248,780	**1,633,185**
Household has negative income, but none of the other housing problems	24,330	0	0	0	0	**24,330**	44,560	0	0	0	0	**44,560**

Data Source: 2010 2014 CHAS

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Table 9 – Cost Burden > 30%
Data Source: 2010 – 2014 CHAS

	Renter						Owner					
	0-30% HAMFI	30-50% HAMFI	50-80% HAMFI	80-100% HAMFI	>100 HAMFI	**Total**	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100 HAMFI	Total
Number of Households												
Small Related	92,060	79,760	62,450	12,940	5,420	**252,630**	36,985	15,245	66,350	34,690	66,690	**219,960**
Large Related	25,920	18,500	10,800	1,580	795	**57,595**	8,680	11,675	27,085	5,950	9,870	**63,260**
Elderly	30,265	26,815	17,830	3,465	3,575	**81,950**	41,835	44,700	42,210	16,810	29,720	**175,275**
Other	73,375	54,725	51,130	11,950	5,925	**197,105**	24,885	20,275	26,850	15,905	26,290	**114,205**
Total need by Income	**221,620**	**179,800**	**142,210**	**29,935**	**15,715**	**589,280**	**112,385**	**91,895**	**162,495**	**73,355**	**132,570**	**572,700**

Table 10 – Cost Burden > 50%
Data Source: 2010 – 2014 CHAS

	Renter						Owner					
	0-30% HAMFI	30-50% HAMFI	50-80% HAMFI	80-100% HAMFI	>100 HAMFI	**Total**	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100 HAMFI	Total
Number of Households												
Small Related	83,400	34,760	7,705	590	235	**126,690**	31,955	26,950	22,680	5,970	8,425	**95,980**
Large Related	14,885	5,385	815	50	15	**21,150**	7,095	6,335	3,385	995	1,005	**18,815**
Elderly	4,120	3,225	1,190	185	195	**8,915**	9,990	8,345	8,525	2,315	3,485	**32,660**
Other	67,355	30,075	7,460	470	195	**105,555**	21,895	14,810	12,180	3,070	3,275	**55,230**
Total need by Income	**169,760**	**73,445**	**17,170**	**1,295**	**640**	**262,310**	**70,935**	**56,440**	**46,770**	**12,350**	**16,190**	**202,685**

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Table 11a – Crowding Information – 1 of 2
Data Source: 2010-2014 CHAS

	Renter						Owner					
	0-30% HAMFI	30-50% HAMFI	50-80% HAMFI	80-100% HAMFI	>100 HAMFI	**Total**	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100 HAMFI	Total
Number of Households												
Single-family households	15,210	12,030	9,340	3,795	5,855	**46,230**	2,075	960	3,520	1,660	4,540	**12,755**
Multiple, unrelated family households	2,060	1,820	2,745	1,075	1,975	**9,675**	570	960	1,750	960	3,580	**7,820**
Other, non-family households	440	460	395	275	560	**2,130**	0	40	35	10	35	**120**
Total need by income	**17,710**	**14,310**	**12,480**	**5,145**	**8,390**	**58,035**	**2,645**	**1,960**	**5,305**	**2,630**	**8,155**	**20,695**

Table 11b – Crowding Information – 2 of 2
Note: data was unavailable for this table.

	Renter				**Owner**			
	0-30% AMI	**>30-50% AMI**	**>50-80% AMI**	**Total**	**0-30% AMI**	**>30-50% AMI**	**>50-80% AMI**	**Total**
Households with Children Present	-	-	-	-	-	-	-	-

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Describe the number and type of single person households in need of housing assistance.

According to the 2010 Census Households and Families table, there are approximately 909,474 single-person households in Georgia, representing 25.4% of total households. According to the 2017 HUD Income Limits Summary, the 50% Very Low-income Limit (VLIL) for a single person household is $21,250, the Extremely Low-Income Limit (ELIL) for a single person household is $12,750, and the 80% Low-Income Limit (LIL) is $34,000. Data on the housing needs for this subgroup was not readily available from the 2014 CHAS dataset.

Estimate the number and type of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault and stalking.

According to 2014 CHAS data, 673,070 households across the state have at least one of the four housing needs (lacks complete kitchen facilities, lacks complete plumbing facilities, more than one person per room, cost burden greater than 30%) and at least one member with some form of disability. Parsing this further, 146,655 of those households have at least one member with a hearing/vision impairment, 214,910 households have at least one member with an ambulatory limitation, 149,780 households have at least one member with a cognitive limitation, and 161,655 households have at least one member with a self-care limitation.

What are the most common housing problems?

Housing problems of low-income households include: lacking complete kitchen facilities (substandard), lacking complete plumbing facilities (substandard), having more than one person per room (overcrowded), and paying more than 30% of gross income towards housing costs (cost burdened). The most common housing problem affecting Georgians, both renters and homeowners, relates to cost burden. Of the 4,114,496 households in Georgia, 1,446,160 have incomes at or below 80% of the area median family income. This represents 35% of all Georgia households.

Of these 1,446,160 households below the 80% threshold, a total of 876,495 (61%) are in some ways cost burdened although this varied by degree of severity. 381,545 (44%) of these households are paying between 30%-50% of their income towards housing costs, while 494,950 households (50.8%) are severely cost burdened, paying in excess of 50% of their household income towards housing costs.

Issues of substandard accommodations and overcrowding are also found in Georgia, however, these housing problems represent a significantly less pressing issue than the problem of cost burdens due to the small number of households that have these issues. The number of households with overcrowding, severe overcrowding, or substandard housing is 77,615 households or 5% of total households in the state.

Are any populations/household types more affected than others by these problems?

The cost burdened renter to owner ratio is 1.14 to 1, however, the difference in proportion of total households that are renters (36%) and owners (63%) means cost burden is actually disproportionately impacting renter households.

The other population that seems to be affected by cost burden is elderly homeowners. There are a total of 448,170 households in Georgia containing at least one person aged 62 or older. Of these households, 203,655 (45%) are cost burdened in excess of 30%, which represents a 5.9% increase in the last five years.

Describe the characteristics and needs of Low-income individuals and families with children (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered 91.205(c)/91.305(c)). Also discuss the needs of formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance

A variety of populations in Georgia are threatened with homelessness. For the purposes of Georgia's Consolidated Plan, the number of households with incomes at or below 30% of the median family income and who spend more than 50% of their income on housing is used as a proxy for the number of households threatened with homelessness. This proxy matches the statistics indicating that most households, immediately prior to becoming homeless, spend as much as 70% of their income on housing. Georgia's population of renters threatened with homelessness includes 240,695 households, or just over 52% of the state's households earning 0-30% AMI.

Extremely low-income households threatened with homelessness require a variety of supportive services to meet their respective needs, including rental/mortgage assistance; security deposit and utility assistance; financial management counseling; landlord-tenant counseling; day care; job counseling; substance abuse counseling; and medical services. Similarly, formerly homeless families and individuals who are receiving rapid rehousing assistance and are nearing the termination of assistance many need additional services to secure long-term stability. In addition to the services mentioned in this paragraph, these persons may require employment assistance and connection to mainstream benefits.

If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates:

The at-risk population was calculated using Table 10 (Housing Problems #4: Cost Burden >50%) and Table 6 (Total Households Table). This was used to obtain the total number of households at 0-30% AMI that are cost burdened at 50%. From there, a percentage of total households was calculated. This methodology is in line with statistical studies that show that immediately prior to becoming homeless, households spend as much as 70% of their income on housing.

Specify particular housing characteristics that have been linked with instability and an increased risk of homelessness

Typically, overcrowding, frequent moves, and low-income levels have been found to contribute to housing instability and increased risk of homelessness. While the rate of overcrowding in Georgia is low, cost burdens may force families to move more frequently and thus contribute to housing instability.

NA-15 Disproportionately Greater Need: Housing Problems - 91.305 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

For purposes of determining whether a disproportionately greater need exists for a particular racial or ethnic group, a determination of whether a group experiences housing problems at a greater rate (10% or more) than the income level as a whole is made. As an example, Table 12 shows a Jurisdictional total of 368,350 households earning 0-30% AMI by adding Column A and Column B. Of this total, 319,100 (86.63%) have one or more housing problems. Any racial or ethnic groups with 96.63% or more of their households with one or more housing problems would indicate a disproportionately greater need for that group. In the tables below, those racial/ethnic groups that face a disproportionately greater need are underlined in Column D. Housing problems include: 1. Lacks complete kitchen facilities; 2. Lacks complete plumbing facilities; 3. More than one person per room; 4. Cost Burden greater than 30%.

Table 12 - Disproportionally Greater Need: 0 - 30% AMI

Here, a group has disproportionate need if Column D is greater than or equal to 96.63%.

Housing Problems	Has one or more of four housing problems (Column A)	Has none of the four housing problems (Column B)	Household has no/negative income, but none of the other housing problems	Disproportionate need calculation (Column D)
Jurisdiction as a whole	319,100	49,250	46,115	86.63%
White	134,150	24,555	32,250	84.53%
Black/African-American	162,070	21,515	7,070	88.28%
Asian	7,615	810	2,660	90.39%
American Indian, Alaska Native	850	195	125	81.34%
Pacific Islander	135	0	45	100.00%
Hispanic	14,280	2,175	3,965	86.78%

Data Source: 2010 – 2014 CHAS

Table 13 - Disproportionally Greater Need: 30 - 50% AMI

Here, a group has disproportionate need if Column D is greater than or equal to 84.22%.

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems	Disproportionate need calculation (Column D)
Jurisdiction as a whole	299,740	104,100	0	74.22%
White	130,025	65,920	0	66.36%
Black/African-American	124,700	30,635	0	80.28%
Asian	8,760	1,525	0	85.17%
American Indian, Alaska Native	970	280	0	77.60%
Pacific Islander	170	10	0	94.44%
Hispanic	35,115	5,730	0	85.97%

Data Source: 2010 – 2014 CHAS

Table 14 - Disproportionally Greater Need: 50 - 80% AMI

Here, a group has disproportionate need if Column D is greater than or equal to 63.45%.

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems	Disproportionate need calculation (Column D)
Jurisdiction as a whole	304,885	265,570	0	53.45%
White	147,750	158,335	0	48.27%
Black/African-American	119,065	80,695	0	59.60%
Asian	9,595	5,130	0	65.16%
American Indian, Alaska Native	735	520	0	58.57%
Pacific Islander	35	200	0	14.89%
Hispanic	27,705	20,690	0	57.25%

Data Source: 2010 – 2014 CHAS

Table 15 - Disproportionally Greater Need: 80 - 100% AMI

Here, a group has disproportionate need if Column D is greater than or equal to 42.44%.

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems	Disproportionate need calculation (Column D)
Jurisdiction as a whole	111,225	111,225	0	32.44%
White	61,910	61,910	0	31.02%
Black/African-American	36,465	36,465	0	33.39%
Asian	4,565	4,565	0	49.40%
American Indian, Alaska Native	260	260	0	40.94%
Pacific Islander	55	55	0	40.74%
Hispanic	7,970	7,970	0	33.11%

Data Source: 2010 – 2014 CHAS

Table 16 - Disproportionally Greater Need: Greater than 100% AMI

Here, a group has disproportionate need if Column D is greater than or equal to 19.94%.

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems	Disproportionate need calculation
Jurisdiction as a whole	171,934	1,556,965	0	9.94%
White	113,300	1,118,835	0	9.20%
Black/African-American	40,620	329,045	0	10.99%
Asian	7,800	48,380	0	13.88%
American Indian, Alaska Native	325	2,760	0	10.53%
Pacific Islander	29	425	0	6.39%
Hispanic	9,860	57,520	0	14.63%

Data Source: 2010 – 2014 CHAS

Discussion

It should be noted that Pacific Islanders only make up 0.1% of Georgia's population according to 2010 Census data, so the data could be skewed by such a small sample of individuals. Asians comprise 3.4% of Georgia's population and 9.1% of all residents are Hispanic, so data for those two groups should be more accurate.

- For households at 0-30% of Area Median Income (AMI) (Table 12), only Pacific Islander households experience disproportionately greater need (90.39%).
- For households at 30-50% AMI (Table 13), statistics indicate that Asian (85.17%), Pacific Islander (94.44%), and Hispanic (85.97%) households indicate disproportionate need.
- For households at 50-80% AMI (Table 14), only Asian households (65.16%) exhibit a disproportionate need, showing a 2.15% increase since the last Consolidated Plan.
- For those at 80-100% AMI, only Asian households exhibit a disproportionate need (49.40%).
- Calculations indicate that no racial/ethnic groups at above 100% AMI experience a disproportionately greater need.

NA-20 Disproportionately Greater Need: Severe Housing Problems – 91.305(b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

For purposes of determining whether a disproportionately greater need exists for a racial or ethnic group, this occurs when the members of such a group experience housing problems at a greater rate (10% or more) than the income level as a whole. As an example, Table 17 shows a Jurisdictional total of 385,595 households earning 0-30% AMI by adding Column A and Column B. Of this total, 295,350 (76.60%) have severe housing problems. For any of the racial or ethnic groups that have 86.60% or more of their households with severe housing problems, that would indicate a disproportionately greater need for that group. Severe housing problems include: 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4.Cost Burden over 50%.

Table 17 – Severe Housing Problems: 0 - 30% AMI

Here, a group has disproportionate need if Column D is greater than or equal to 86.60%.

Severe Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems	Disproportionate need calculation (Column D)
Jurisdiction as a whole	295,350	90,245	67,860	76.60%
White	116,015	42,695	32,250	73.10%
Black/African-American	143,305	40,280	28,815	78.06%
Asian	6,940	1,485	2,660	82.37%
American Indian, Alaska Native	695	350	125	66.51%
Pacific Islander	135	0	45	100.00%
Hispanic	28,260	5,435	3,965	83.87%

Data Source: 2010 – 2014 CHAS

Table 18 – Severe Housing Problems 30 - 50% AMI

Here, a group has disproportionate need if Column D is greater than or equal to 52.54%.

Severe Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems	Disproportionate need calculation
Jurisdiction as a whole	171,790	232,045	0	42.54%
White	74,740	121,205	0	38.14%
Black/African-American	70,570	84,760	0	45.43%
Asian	5,865	4,420	0	57.02%
American Indian, Alaska Native	410	840	0	32.80%
Pacific Islander	65	115	0	36.11%
Hispanic	20,140	20,705	0	49.31%

Data Source: 2009 – 2013 CHAS

Table 19 – Severe Housing Problems: 50 - 80% AMI

Here, a group has disproportionate need if Column D is greater than or equal to 30.54%.

Severe Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems	Disproportionate need calculation (Column D)
Jurisdiction as a whole	97,205	473,245	0	20.54%
White	49,230	256,845	0	19.17%
Black/African-American	33,500	166,265	0	20.15%
Asian	3,920	10,805	0	36.28%
American Indian, Alaska Native	90	1,165	0	7.73%
Pacific Islander	20	215	0	9.30%
Hispanic	10,445	37,950	0	27.52%

Data Source: 2009 – 2013 CHAS

Table 20 – Severe Housing Problems: 80 - 100% AMI

Here, a group has disproportionate need if Column D is greater than or equal to 17.79%.

Severe Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems	Disproportionate need calculation (Column D)
Jurisdiction as a whole	26,709	316,175	0	7.79%
White	14,550	185,035	0	7.29%
Black/African-American	7,415	101,805	0	6.79%
Asian	1,440	7,795	0	15.59%
American Indian, Alaska Native	24	610	0	3.79%
Pacific Islander	15	120	0	11.11%
Hispanic	3,265	20,810	0	13.56%

Data Source: 2010 – 2014 CHAS

Table 21 – Severe Housing Problems: Greater than 100% AMI

Here, a group has disproportionate need if Column D is greater than or equal to 13.49%.

Severe Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems	Disproportionate need calculation (Column D)
Jurisdiction as a whole	45,109	316,175	0	12.49%
White	26,695	185,035	0	12.61%
Black/African-American	10,430	101,805	0	9.29%
Asian	2,720	7,795	0	25.87%
American Indian, Alaska Native	155	610	0	20.26%
Pacific Islander	29	120	0	19.46%
Hispanic	5,080	20,810	0	19.62%

Data Source: 2010 – 2014 CHAS

Discussion

Again, it should be noted that Pacific Islanders only make up 0.1% of Georgia's population according to 2010 Census data so the data could be skewed by such a small sample of individuals. Asians comprise 3.4% of Georgia's population and 9.1% of all residents are Hispanic, so data for those two groups should be more accurate.

- For households at 0-30% of Area Median Income (AMI) (Table 17), only Pacific Islander (100%) households experience a disproportionately greater need.
- For households at 30-50% AMI (Table 18), only Asian (57.02%) households demonstrate disproportionately greater need.
- For households at 50-80% AMI (Table 19), again only Asian (36.28%) households demonstrate disproportionate need.
- No single group displayed a disproportionate need at 80-100% AMI (Table 20).
- At greater than 100% AMI (Table 21), Asian (25.87%), Native American/Alaskan Native (20.26%), Pacific Islander (19.46%), and Hispanic (19.62%) households displayed disproportionate need.

NA-25 Disproportionately Greater Need: Housing Cost Burdens – 91.305 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

For purposes of determining whether a disproportionately greater need exists for a racial or ethnic group, this occurs when the members of such a group experience housing problems at a greater rate (10% or more) than the population as a whole.

Table 22 – Greater Need: Housing Cost Burdens by Race/Ethnicity

	≤30% of Income on Housing (Not Cost Burdened)	30-50% of Income on Housing (Cost Burdened)	>50% of Income on Housing (Severely Cost Burdened)	No / negative income (Not computed)	Percent spending ≤30% of Income on Housing (Cost Burdened)	Percent spending ≤50% of Income on Housing (Severely Cost Burdened)
	Column A	Column B	Column C	Column D	Column E	Column F
Jurisdiction as a whole	***2,268,895***	***605,765***	***546,715***	***72,140***	***33.68%***	***15.98%***
White	1,529,890	313,265	248,010	33,540	26.84%	11.86%
Black / African-American	553,545	226,030	236,280	30,525	45.51%	23.26%
Asian	63,770	11,760	16,360	2,860	30.60%	17.80%
American Indian, Alaska Native	4,305	1,800	1,175	85	40.87%	16.14%
Pacific Islander	725	180	235	3,190	36.40%	20.61%
Hispanic	116,660	52,730	44,655	1,940	45.50%	20.86%

Data Source: 2010 – 2014 CHAS

Discussion

Table 22 shows the level of housing cost burden for Georgia as a whole and for specific races and ethnicities.

Column E of this table indicates that 33.68% of Georgia's households are cost burdened: they spend 30% or more of their income on housing.

- Data indicates that any racial or ethnic group in which 43.68% or more spend 30% or more of their income on housing costs experience a disproportionately greater need.
- Two populations meet this criteria: African-American (45.51%) and Hispanic (45.50%) households. Though significant shares of Asian (30.60%), American Indian/Alaskan Native (40.87%), and Pacific Islander (36.40%) households spend 30% or more of their income on housing costs, these statistics did not meet the necessary disproportionate greater need threshold.

Column F of this table indicates that 15.98% of Georgia's households are severely cost burdened: they spend 50% or more of their income on housing. African-American (23.26%), Asian (17.80%), Pacific Islander (20.61%), and Hispanic (20.86%) households demonstrate disproportionate need.

In both Column E and Column F, only White households exhibit a lower rate of cost-burden (26.84%) and severe cost-burden (11.86%) than Georgia residents as a whole (33.68% and 15.98%, respectively).

NA-30 Disproportionately Greater Need: Discussion – 91.305 (b)(2)

Are there any Income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category as a whole?

The preceding tables show the breakdown of each of the three categories of housing issues and a summary of which racial or ethnic groups are disproportionately affected by income grouping compared to the effect on all members of the group. For all categories underlined, those groups have at least a 10% or higher percentage that are affected by the problem than the group as a whole. African-American, Asian, Pacific Island, and Hispanic households demonstrate disproportionate need.

If they have needs not identified above, what are those needs?

The tables above indicate that there is a disproportionately greater need for Hispanics, Asians, and Pacific Islanders as these groups present disproportionate need regarding at least 1 of the 4 housing problems. This is particularly evident when looking at regular to severe cost burdens from the 0-30% and 30-50% AMI range. However, these patterns can be seen even in those making 50-80% AMI. It should be pointed out that the overall number of Pacific Islanders in Georgia are 0.1% of the total population according to 2010 Census data and that the numbers of households experiencing housing problems could be affected by the small number of households in that state for this population.

The last table showing Housing Cost Burden identifies the aforementioned groups while observing that African-Americans are also facing disproportionate impacts from housing cost burdens as well. Native American/Alaskan native households also show high incidence of cost burden, although it did not reach the 10% threshold. These patterns are evident in at both regular and sever cost burden levels. This indicates that there should be efforts to increase affordable housing for Hispanics, Asians, Pacific Islanders, and African-Americans through significant programs at the 0-50%AMI level as well as the 50-80% AMI level.

Are any of those racial or ethnic groups located in specific areas or neighborhoods in your community?

According to the Affirmatively Furthering Fair Housing (AFFH) mapping tool, African-American communities can be found predominantly to the east and southwest of the state. Specifically, these communities are clustered in the counties surrounding Glascock County (Washington County, Burke County, Warren County, Taliaferro County, Hancock County and Jefferson County). Additionally, they are clustered in the area around Calhoun County (Dougherty County, Early County, Randolph County, and Terrell County)

Hispanic communities can be found in Hall County, Whitfield County, Gwinnett County, Stewart County, Atkinson County, and Echols County.

Asian/Pacific Islander communities in the state include and cluster around Fulton County. Particularly, Gwinnett County but it also includes DeKalb County, Clayton County, Cobb County, Forsyth County, Barrow County, and Fayette County.

NA-35 Public Housing – (Optional)

Introduction

This section describes the use of vouchers by resident characteristics.

Table 23 - Public Housing by Program Type

Program Type									
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project -based	Tenant -based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers in use	0	0	0	16,228	125	15,701	282	0	58

Data Source: PIC (PIH Information Center)

*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Table 24 – Characteristics of Public Housing Residents by Program Type

Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers				
				Total	Project - based	Tenant - based	Special Purpose Voucher	
							Veterans Affairs Supportive Housing	Family Unification Program
# Homeless at admission	0	0	0	0	0	0	0	0
# of Elderly Program Participants (>62)	0	0	0	2,478	5	2,424	26	0
# of Disabled Families	0	0	0	3,004	36	2,869	49	0
# of Families requesting accessibility features	0	0	0	16,228	125	15,701	282	0
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0
# of DV victims	0	0	0	0	0	0	0	0

Data Source: PIC (PIH Information Center

OMB Control No: 2506-0117 (exp. 06/30/2018)

Table 25 – Race of Public Housing Residents by Program Type

Program Type									
Race	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project -based	Tenant -based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	0	0	0	2,280	64	2,158	38	0	14
Black/African-American	0	0	0	13,893	58	13,494	243	0	43
Asian	0	0	0	22	2	18	0	0	1
American Indian/Alaska Native	0	0	0	23	0	22	1	0	0
Pacific Islander	0	0	0	10	1	9	0	0	0
Other	0	0	0	0	0	0	0	0	0
***includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition**									

Data Source: PIC (PIH Information Center)

Table 26 – Ethnicity of Public Housing Residents by Program Type

Program Type									
Ethnicity	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project -based	Tenant -based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic	0	0	0	260	10	241	6	0	0
Not Hispanic	0	0	0	15,968	115	15,460	276	0	58
***includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition**									

Data Source: PIC (PIH Information Center)

Section 504 Needs Assessment: Describe the needs of public housing tenants and applicants on the waiting list for accessible units:

HCV staff in DCA work to recruit and educate both applicants on the waitlist and landlords about reasonable accommodations including accessible units. This education includes the rights and responsibilities of the landlord as well as the applicant including providing exception payment standards up to 110 percent of the published fair market rent.

What are the number and type of families on the waiting lists for public housing and Housing Choice Voucher tenant-based rental assistance? Based on the information above, and any other information available to the jurisdiction, what are the most immediate needs of residents of public housing and Housing Choice voucher holders?

DCA opened its Housing Choice Voucher waitlist in February 2016. Based on the lottery selection, 22,000 applicants were placed on the list. DCA is currently pulling eligible applicants from the waitlist and issuing vouchers. Due to the high demand of the rental market, applicants are competing with market rate tenants as well.

How do these needs compare to the housing needs of the population at large?

Based on the high rental market, the competition is high for market rate searchers competing with voucher holders for affordable housing.

NA-40 Homeless Needs Assessment – 91.305(c)

Introduction:

This section discusses homeless needs in the Balance of State CoC.

If data is not available for the categories "number of persons becoming and exiting homelessness each year," and "number of days that persons experience homelessness," describe these categories for each homeless population type (including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth):

Data for sheltered persons entering and exiting homelessness each year in Georgia's Balance of State were measured directly from 2017 HMIS data. 4,192 people exited homelessness in 2014 in the Balance of State CoC with only 17% returning to homelessness within two years of exit. In 2016, 5,269 people entered homelessness. The average number of days persons experience homelessness in the Georgia Balance of State CoC is 146 days with a median length of time as homeless of 25 days. Data on length of time regarding homelessness specific to each homeless population types including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth are not currently available.

Table 27 – Nature and Extent of Homelessness

Race:	**Sheltered:**	**Unsheltered (optional)**
White	563	957
Black or African-American	1,164	819
Asian	12	2
American Indian or Alaska Native	4	25
Pacific Islander	1	5
Ethnicity:	**Sheltered:**	**Unsheltered (optional)**
Hispanic	169	67
Not Hispanic	1,674	1806

Data Source - 2017 Point in Time Homeless Count

Estimate the number and type of families in need of housing assistance for families with children and the families of veterans.

Based upon the Homeless Count conducted on January 23, 2017, it is estimated that there are 169 unsheltered families with children who are in need of housing assistance. Of that number, it is estimated that the 3 households identified a veteran as the head of household. The estimated number of unsheltered persons on the night of January 23, 2017 is derived from a combination of service-based survey methods developed by DCA and regression modeling.

Describe the Nature and Extent of Homelessness by Racial and Ethnic Group.

Of the 1,843 persons who were residing in a shelter or transitional housing on the night of the January 23, 2017 Point in Time Homeless Count, 63% were Black or African-American and 9% were Hispanic. Of the 1,873 persons who were residing in a place not meant for human habitation on the night of the January 23, 2017 Point in Time Homeless Count, 44% were Black or African-American and 4% were Hispanic.

Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.

Several factors influence the prevalence of homelessness in different areas, including job markets and the availability of affordable housing. Although it is often assumed that homelessness is an urban problem, it actually occurs in both urban and rural areas. Urban areas typically offer more housing and supportive service programs to homeless individuals, therefore service usage data is often swayed in the direction of urban versus rural.

Please note, the homeless count data reported throughout this document reflects data from the 2017 Balance of State Unsheltered Homeless Count and/or the 2017 Sheltered Homeless Count. Beginning with the 2013 Homeless Count, as per the requirements, the count data for consolidated planning jurisdictions within the Balance of State CoC will be available for the separate consolidated planning jurisdictions. Homeless count data for the Balance of State CoC can be found at:

http://www.dca.ga.gov/housing/specialneeds/programs/homeless_count.asp.

NA-45 Non-Homeless Special Needs Assessment – 91.305 (b,d)

Introduction

This section discusses the needs of the non-homeless special needs served by the State's HOPWA program.

Table 28 – HOPWA Data

HIV Surveillance Data (2015)	
Total number of Persons living with HIV/AIDS (PLWHA)	54,754
Number of PLWHA with AIDS diagnose only	28,998
New HIV diagnoses during 2015	2741
Rate per 100,000 population	27
New AIDS diagnoses during 2015	1296
Rate per 100,000	13
Deaths related to HIV in 2015	699

Data Source: CDC HIV Surveillance

Table 29 – HIV Housing Need

Type of HOPWA Assistance	Estimates of Unmet Need
Estimated Number of households that have Unmet housing subsidy assistance need	371
Tenant-based rental assistance	187
Facility Based Housing (Permanent, short-term or transitional)	184

Data Source: HOPWA CAPER and HOPWA Beneficiary Verification Worksheet

Describe the characteristics of special needs populations in your community:

Human immunodeficiency virus (HIV) damages specific cells of the immune system called CD4 cells. Untreated, HIV eventually overwhelms the immune system, resulting in a chronic life-threatening condition called Acquired immune deficiency syndrome (AIDS). In Table 28 – HOPWA Data, the term HIV infection refers to HIV diagnosis regardless of stage of disease, that is, HIV infection includes HIV (not AIDS) and AIDS. Based on the CD4 count (cells/ml), HIV infection is defined as Stage 1 (CD4 – 500 cells/ml), Stage 2 (CD4 200-499 cells/ml) and Stage 3 (AIDS) (<200 cells/ml). There is no cure for HIV infection, but with antiretroviral therapy (ART), HIV infection can be controlled. Advances in HIV treatment with ART have led to improved quality of life and prolonged lifespan for people living with HIV. Further, achieving viral suppression with effective ART use reduces HIV transmission due to decreased levels of circulating virus.

HIV infection remains an important public health problem in the state of Georgia. In 2015, Georgia was ranked the fifth-highest in the nation for the total number of new diagnoses of HIV infection among adults and adolescents after Florida, California, Texas and New York. There were 2,741 new diagnoses of HIV infection during 2015 in Georgia. The majority of these new diagnoses were among males (80%). The highest percentage of new HIV diagnoses and Stage 3 (AIDS) diagnoses was seen among those aged 30 to 39 years of age, 22% and 26%, respectively. Among all race/ethnicities, Black/non-Hispanics accounted for the majority of diagnoses (72% of new HIV infections and 73% of Stage 3 AIDS). Eighty-three percent (1,849) of new HIV infections among Georgia males during 2015 were attributed to male to male sexual contact or Men who have sex with men (MSM).

As of December 31, 2015, there were 54,754 persons living with diagnosed HIV infection in Georgia. Similar to the new diagnoses of HIV infection, the majority of prevalent cases are among Black/Non-Hispanic persons (67%) and males (75%). Seventy-eight percent (32,429) of prevalent HIV cases among males were attributed to MSM sexual contact and 82% (10,873) of cases among females were attributed to heterosexual contact.

Monitoring the HIV/AIDS epidemic and understanding the burden of HIV infection in Georgia are essential for meeting the goals stated in the 2020 National HIV/AIDS Strategy to: 1) reduce HIV infections; 2) increase access to care and optimize health outcomes for persons living with HIV; 3) reduce HIV-related health disparities; and 4) achieve a more coordinated national response to the HIV epidemic. See HIV Surveillance Summary, Georgia 2015, HIV/AIDS Epidemiology Section, Georgia Department of Public Health.

What are the housing and supportive service needs of these populations and how are these needs determined?

DCA's HOPWA Program tries to meet the housing needs of PLWHA in the 126 counties it implements. With the help of HOPWA Project Sponsors, services are offered in 114 Georgia counties. There are 12 Georgia counties outside the service range of the present HOPWA program sponsors, including Upson, Taliaferro, Warren, Glascock, Jefferson, Wilkes, Lincoln, Emanuel, Jenkins, Screven, Effingham and Bryan. There are other Continuum of Care (CoC) and Emergency Solutions Grants (ESG) programs offered by DCA in these counties for the homeless that could also benefit PLWHA in homeless situations.

Persons served have a high need for permanent affordable housing and other supportive services to accompany this housing. Supportive services include, but are not limited to, health, mental health, assessment, permanent housing placement, drug and alcohol abuse treatment and counseling, day care, personal assistance, nutritional services, intensive care when required, and assistance in gaining access to local, State, and Federal government benefits and services, except that health services may only be provided to individuals with acquired immunodeficiency syndrome or related diseases and not to family members of these individuals. Housing needs include short-term rent, mortgage, utility payments to prevent the homelessness of the tenant, and project or tenant-based rental assistance.

Efforts are now being made to cover the gaps in HOPWA services. The HOPWA Program has established a partnership with the Department of Public Health (DPH), HIV Division, and Ryan White Part B Program. HOPWA Program Sponsors will be working together with the Ryan White Part B Program to provide HOPWA services to all the Balance of State counties.

In order to quantify the amount of housing needed for PLWHA, we refer to the Georgia Balance of State CoC Point in Time Homeless Count Report. According to the 2015 Georgia Balance of State CoC Point in Time Homeless Count Report, a total of 5,797 homeless persons were identified, of which 3,518 were Unsheltered Homeless. A link to the report can be found below:

http://www.dca.state.ga.us/housing/specialneeds/programs/homeless_count.asp

Over the years, with continued efforts to end homelessness in the community, these Point in Time Homeless Count Reports are showing a decrease in homeless numbers. According to the 2017 Georgia Balance of State CoC Point in Time Homeless Count Report, a total of 3,716 homeless persons were reported, of which 1,843 were Unsheltered Homeless. While the Point in Time Homeless Count Reports show a decrease, these numbers are just the tip of iceberg regarding the state of homeless persons in Georgia. There is always hidden homelessness, people living in compromising situations, who never get reported.

Similar to homeless count numbers, HIV numbers are likely under-reported in rural areas. This is largely a result of the high social stigma attached to HIV/AIDS and the lack of, or very limited, services and resources. Recent statistics report an increase in AIDS diagnosed cases in Georgia, especially in the Balance of State CoC rural areas. The increase shows that people are either reluctant to come forward for HIV testing and counseling or not encouraged to do so because of very limited resources, lack of transportation, and lack of funds. Because of aforementioned issues among many others, individuals do not get diagnosed until they become sick with AIDS.

The National Coalition for the Homeless in its paper on HIV/AIDS and Homelessness, NCH Fact Sheet #9, 2007, reported that the prevalence of HIV among homeless people is between 3% - 20% with some subgroups having much higher burdens of disease. Because there are no specific need assessment studies to capture the housing needs of PLWHA, we can estimate that 10%, in the middle of the HIV/AIDS and Homeless range of 3% - 20%, to be PLWHA. Therefore, 10% of the 3,716 homeless persons recorded in the 2017 Point in Time Homeless Count, or 371 persons are estimated to be PLWHA (Table 23).

The type of HOPWA services that would most benefit homeless persons is determined based on the type of homelessness. Unsheltered homeless persons might need more structured wrap-around services and would benefit from Facility-Based Housing whereas Tenant-Based Rental Assistance (TBRA) could benefit other homeless persons. Among the homeless persons recorded in the 2017 Point in Time Homeless Count, 1,843 are unsheltered homeless. Again calculating 10% as the percentage of homeless persons infected with HIV, the number of HIV infected persons with Unsheltered Housing is estimated at 184 and would benefit from Facility-Based Housing. The remaining 187 homeless persons infected with HIV (out of the total 371 persons) would benefit from TBRA.

These estimates only count the homeless numbers and do not count persons housed in unaffordable housing that could benefit from short-term rent, mortgage and utility (STRMU) assistance. Many people do not have affordable housing, so the actual need for subsidized housing is very high. The numbers reported here could be just the 10% of the total due to imperfect survey opportunities and controls. The attached CAPER report also depicts that program participants are benefitting more from TBRA and Facility-based Housing Programs. Even those assisted with Permanent Housing Placement (PHP) services and STRMU are in need of long-term housing subsidies. Because of limited HOPWA funding, PLWHA are not able to access long-term housing assistance through HOPWA. Those who are currently in the program will be removed in 2-3 years but will still most likely need housing subsidies. While DCA is engaged in efforts to fill the gaps in services, assistance ensuring these individuals' long-term success is needed.

Discuss the size and characteristics of the population with HIV/AIDS and their families within the Eligible Metropolitan Statistical Area:

According to the Georgia Department of Public Health's HIV Surveillance Fact Sheet in 2015, Georgia was ranked fifth highest in the nation for total number of adults and adolescents living with HIV infection. As of December 31, 2015, the total number of persons living with HIV infection in Georgia was 54,754. Of these, 53% (28,998) had Stage 3 (AIDS). Out of the 2,741 new HIV diagnoses during 2015, 1,296 were diagnosed with AIDS. Eight-one percent (2,208) of those diagnosed with HIV infection were male and 19% (525) were female. Six transgender persons were diagnosed with HIV. Seventy-two percent (1,980) of new diagnoses of HIV infection were among Black persons. The highest number of new diagnoses occurred among males 20-29 years of age. Among males, 83% of new diagnoses were attributed to male to male (MSM) sexual contact. Among females, 90% of new diagnoses were attributed to heterosexual contact.

Among the 18 Public Health Districts in Georgia, Fulton and DeKalb had the highest numbers and rates of persons living with HIV infection. Nearly two-thirds (64%) of persons living with HIV infection in 2015 resided in the Atlanta, Metropolitan Statistical Area (MSA). These were followed by East Metro Lawrenceville, Cobb-Douglas, Clayton, Coastal Savannah, East Central Augusta, North Central Macon, LaGrange, Southwest Albany, West Central Columbus, South Valdosta and Southeast Waycross.

NA-50 Non-Housing Community Development Needs - 91.315 (f)

Describe the jurisdiction's need for Public Facilities:

There is a need for public facility improvements throughout the state. Funds are awarded to local governments competitively through the Annual Competition for these projects. It is difficult to predict exactly what the need is as it changes over time and is a product of the number and scope of funding requests that DCA receives. For the most recent program year, $37.5 million dollars in funding was provided for 59 Georgia communities through 61 grant awards. 51 of these awards focus directly on physical improvement to communities through infrastructure, neighborhood revitalization, or community center project development. 33 of the awards were for drainage, street, sewer, or multi-infrastructure improvements to communities. 7 funded projects were for facility centers, including 2 youth centers, 3 senior centers, and 2 health centers.

How were these needs determined?

The needs were based on CDBG Program Year 2017 funded projects. Awards, which are made based on the applications received from our local government partners, are representative of the needs in each community.

Describe the jurisdiction's need for Public Improvements:

Of the Public Facility/Improvements funded in Program Year 2017, 33 were for public improvements, including: 11 for streets and drainage, 4 for water, 10 for sewers, 3 for multi-infrastructure, and 7 for water and sewer projects.

How were these needs determined?

These were from CDBG Program Year 2017 grant awards.

Describe the jurisdiction's need for Public Services:

DCA generally does not provide direct funding for public services. Local governments that apply for public facilities often use funding for public services provided by other agencies, e.g., Area Agencies on Aging, and combine these funds with CDBG dollars to meet both facilities needs and public service needs. Therefore, demand for senior centers and health centers are an indication of public service needs. Again, funding all requests for these needs is not possible given the limited availability of CDBG dollars.

How were these needs determined?

These needs were determined by looking through program documentation, highlighting where agency initiatives resulted in support of housing needs through community development.

Housing Market Analysis

MA-05 Overview

Housing Market Analysis Overview:

According to the HUD Market-at-a-Glance report, vacancy rates for purchased homes markets has steadily declined since the 2010 census. Rates fell from 3.4% (2010) to 1.9% (2016). Rental vacancy rates follow this trend as well, falling from 12.4% (2010) to 6.2% (2016). At the same time, annual building activity for single and multifamily housing trends are up over the last 6 years. Annual building permits for single-family housing has increased from 14,777 in 2010 to 36,334 in 2016. Multifamily building permits has increased from 2,486 units per year to 15,194 units per year over that same period. According to RealtyTrac, Georgia no longer ranks in the top 5 highest foreclosure rate national list, as it has in recent years. Additionally, this rate has declined since last year and is at 1 in every 3354 housing units, below the national average. The housing market has seen strong growth but a recent issue has been the preservation of constructed affordable housing units.

According to CoreLogic housing data, 4.61% of Georgia mortgages are in negative equity share status or are, in other words, underwater. The state has an equity percentage of rate of 40.69% with over 80,784 negative equity loans. Of these mortgages, 11.11 are non-owner-occupied purchases, 8.98% are non-owner-occupied refinances, and the overall non-owner-occupied rate is 10.24% of the 3,644,593 Residential Housing Stock.

As the state moves to increase the affordability of housing, a reduction of cost burden through the preservation of affordable housing is a particularly acute concern.

MA-10 Number of Housing Units – 91.310(a)

Introduction

This section discusses housing units available to Georgia residents.

Table 30 – Residential Properties by Unit Number

Property Type	Number	%
1-unit, detached	2,742,156	66.30%
1-unit, attached	153,418	3.70%
2 units	91,607	2.20%
3 to 4 units	124,540	3.00%
5 to 9 units	210,166	5.10%
10 to 19 units	194,905	4.70%
20 or more units	230,534	5.60%
Mobile Home, boat, RV, van, etc.	382,992	9.30%
Boat, RV, van, etc.	2,747	0.10%
Total	4,133,065	100%

Data Source: 2011 – 2015 ACS

Table 31 – Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	6,123	0%	36,160	3%
1 bedroom	26,881	1%	221,703	17%
2 bedrooms	261,627	12%	499,353	38%
3 bedrooms	1,159,319	51%	424,848	32%
4 bedrooms	587,756	26%	104,845	8%
5 or more bedrooms	221,991	10%	23,756	2%
Total	2,263,697	100%	1,310,665	100%

Data Source: 2011 – 2015 ACS

Describe the number and targeting (income level/type of family served) of units assisted with federal, state, and local programs.

Most of DCA's housing programs are competitive and all types of applications are received for homeowner housing as well as rental. For that reason, there are not specific targets as applicants design their own projects. For all HUD-funded programs, the focus is on those households at or below 80% of area median income. In many of these programs, an emphasis is placed on the development of housing through scoring for occupancy by persons below 50% of median income. In addition, two groups for which there is a special emphasis is the elderly and those with physical and/or mental disabilities.

Provide an assessment of units expected to be lost from the affordable housing inventory for any reason, such as expiration of Housing Choice Voucher contracts.

The State of Georgia is currently allocated a total of 17,128 Housing Choice Vouchers. The allocation of these vouchers by HUD is not expected to decrease in the near future. However, a variety of factors can contribute to the loss of affordable housing inventory including:

- Lease Violations
- Non-compliance with Program Requirements
- Failure of Tenant to Pay Rent
- Eviction for Damages
- Portability Outside of Service Area
- Failure to Complete Annual Review

Does the availability of housing units meet the needs of the population?

There appears to be an adequate raw number of housing units when not accounting for the effects that cost burdens can have on their availability to Georgia residents. American Community Survey data from 2012-2016 shows that there are 544,812 vacant housing units in the state which is a decrease from the prior 5 years. This represents 13.1% of the total housing units in Georgia. The rental vacancy rate for the State is 7.8% and the same rate for homeowner units is 2.4%.

Describe the need for specific types of housing:

Two categories of housing that Georgia needs more of are affordable rental housing for elderly and for those who are disabled. As both of these groups are often living on fixed incomes, it is difficult for them to find quality rental housing they can afford. More rental housing affordable to those at or below 30% of median income is needed for these groups.

Another group that needs housing of this type are those that are coming out of institutions and moving to community-based housing as part of the settlement agreement with the Department of Justice. These individuals also are typically below 30% of area median income. An added challenge in housing these populations in the community is the need for services to assist them in living independently. Linkages with Community Service Boards, Boards of Health, and other service providers are needed to allow them to successfully make this transition out of institutional settings.

MA-15 Cost of Housing – 91.310(a)

Introduction

Georgia's median home values modestly increased from 2010 to 2016 but the median contract rents changed significantly (+28%). Around 11% of households pay less than $500 dollars per month while 49% pay between $500 and $999 for rent. This can cause difficulties for homeowners and renters below 50% of area median income and particularly for those below 30% AMI.

Table 32 – Cost of Housing

	2006	2010	2016	Change from 2006-2016	Change from 2010-2016
Median Home Value	$156,800	$160,100	$166,800	+6.37%	+4.18%
Median Contract Rent	$586	$622	$754	+28%	+21.22%

Data Source: ACS 2006, 2010, 2016

Table 33 - Rent Paid

Rent Paid	Number	%
Less than $100	2,919	0%
$100 to $149	4,360	0%
$150 to $199	10,582	1%
$200 to $249	17,043	1%
$250 to $299	15,048	1%
$300 to $349	16,644	1%
$350 to $399	18,721	1%
$400 to $449	23,345	2%
$450 to $499	31,082	2%
$500 to $549	40,250	3%
$550 to $599	47,375	4%
$600 to $649	58,422	4%
$650 to $699	63,357	5%
$700 to $749	70,589	5%
$750 to $799	73,699	6%
$800 to $899	154,702	12%
$900 to $999	139,807	11%
$1,000 to $1,249	232,019	18%
$1,250 to $1,499	114,209	9%
$1,500 to $1,999	71,980	5%
$2,000 to $2,499	16,040	1%
$2,500 to $2,999	4,751	0%
$3,000 to $3,499	2,166	0%
$3,500 or more	2,333	0%
No cash rent	79,222	6%
Total	1,310,665	100.0%

Data Source: 2011 – 2015 ACS

Table 34 – Housing Affordability

Number of Units affordable to Households earning	Renter	Owner	Total
Household income <= 30% HAMFI	154,500	305,280	459,780
Household income < 30% to <=50% HAMFI	187,095	221,530	408,625
Household income < 50% to <=80% HAMFI	317,505	260,250	577,755
Household income < 80% to <=100% HAMFI	216,830	130,740	347,570
Household income >100% HAMFI	1,396,070	350,885	1,746,955
Total	2,272,000	1,268,690	3,540,690

Data Source: 2010 – 2014 CHAS

Table 35 – Monthly Rent

Average Monthly Rent	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	$572	$619	$751	$1,019	$1,202
High HOME Rent	$559	$587	$719	$924	$1,024
Low HOME Rent	$478	$511	$616	$712	$795

Data Source: HUD FMR and HOME Rents

Is there sufficient housing for households at all income levels?

There is not sufficient housing at all income levels for the citizens of Georgia as there is a great need for more housing for those at the lowest income levels. As noted in section NA-10, a significant proportion (over 60%) of Georgia households below 80% of AMI are cost burdened to some degree. This reflects a lack of choice in housing that would be affordable and conveniently located for households across the state.

How is affordability of housing likely to change considering changes to home values and/or rents?

According to the ACS, median home values increased from $160,100 in 2010 to $166,800 in 2016 representing an increase of 4.18%. These rising values represent increases in wealth for households, however, it also makes it harder for low-income individuals to achieve home ownership.

Georgia's rents have seen a significant increase from 2010 to 2016. The ACS identified the median contract rent as $640 in 2010, which increased to $754 by 2016. This represents a 21.22% increase in only 6 years. This trend is concerning due to the previously identified affordability problems for rental households in the state. ACS data shows there to be 1,310,665 occupied units where rent is being paid and 787,060 of these have household incomes at or below 80% AMI.

Looking at the trends in median home value, median contract rent, current renter income levels, known cost burdens, and stagnant wage growth at the national level, it can reasonably be expected that the affordability of housing is likely to decrease sharply in coming years.

How do HOME rents / Fair Market Rent compare to Area Median Rent? How might this impact your strategy to produce or preserve affordable housing?

As of the 2018 release of the HOME rent limits, every county in Georgia, with the exception of four (Dougherty, Liberty, Talbot, and Taliaferro), have the same high HOME rent limit as the Fair Market Rent (FMR) in the county. Two of the "exception" counties are urban counties and the other two are rural. Where they do deviate, high HOME rents are lower than the Fair Market Rents.

The 2018 Qualified Allocation Plan (QAP), the document that guides the allocation of State and Federal Low-Income Housing Tax Credits and HOME multi-family funds, states that all units with High HOME rent must be underwritten at the maximum HOME rent. This means that all HOME rents will be at or less than FMR.

MA-20 Condition of Housing – 91.310(a)

Introduction:

According to ACS estimates, there are a total of 3,574,362 housing units in Georgia, representing a 12% decrease from 2011. Of these, 85.09% are occupied and 14.91% are vacant. This total number of units represents just a 0.97% increase from the total number of units in 2009. For comparison, the vacancy rate for all housing units in the 2000 Census was just 8.39%. Demand for housing throughout Georgia has been strong during the previous consolidated plan cycle and is expected to steadily increase during the next cycle.

Generally, Georgia's housing stock is relatively new. According to ACS data, on average 63.58% of owner or renter occupied units in the state were constructed in 1980 or later. On average, only 4% of current renter or owner-occupied units were constructed prior to 1950. While a number of Georgia's household are experiencing housing problems, most are related to overcrowding or cost burden and not the condition of the homes.

Definitions

"Substandard condition" is defined as housing that fails to meet all state and local codes. Units that are "substandard but suitable for rehabilitation" would be ones that fail to meet state and local codes but are structurally and financially feasible to rehabilitate.

Table 36 - Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	525,820	23.20%	605398	45.00%
With two selected Conditions	9,672	0.43%	36793	2.73%
With three selected Conditions	666	0.03%	1331	0.10%
With four selected Conditions	26	0.00%	77	0.01%
No selected Conditions	1730227	76.34%	701696	52.16%
Total	2,266,411	100%	1,345,295	100%

Data Source: 2010 – 2014 ACS

Table 37 – Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Built 2014 or later	3,312	0%	1,063	0%
Built 2010 to 2013	35,596	2%	24,331	2%
Built 2000 to 2009	572,819	25%	262,414	20%
Built 1990 to 1999	519,998	23%	260,449	20%
Built 1980 to 1989	380,477	17%	243,085	19%
Built 1970 to 1979	290,545	13%	205,898	16%
Built 1960 to 1969	188,537	8%	125,294	10%
Built 1950 to 1959	129,924	6%	85,786	7%
Built 1940 to 1949	55,211	2%	42,199	3%
Built 1939 or earlier	87,278	4%	60,146	5%
Total	2,263,697	100%	1,310,665	100%

Data Source: 2010 – 2014 CHAS

Table 38 – Risk of Lead-Based Paint

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	763,220	22%	510,335	40%
Housing Units build before 1980 with children present	79,025	2%	106,825	8%

Data Source: 2010 – 2014 CHAS (Units with Children present)

Table 39 - Vacant Units

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant Units			
Abandoned Vacant Units			
REO Properties			
Abandoned REO Properties			

Note: Data for this table unavailable

Table 40 – Vacancy Status

Vacancy Status	*Total*
For rent	94,326
Rented, not occupied	21,431
For sale only	43,064
Sold, not occupied	18,843
For seasonal, recreational, or occasional use	98,211
For migrant workers	977
Other vacant	256,116
Total:	532,968

Data Source: 2016 ACS 1-Year Estimates

Need for Owner and Rental Rehabilitation

Table 36 shows that there are a total of 1,131,218 housing units in the state that have at least one of the following conditions: lacking complete kitchen or plumbing facilities, severe overcrowding, or cost burden. Of this total, 53.51% of these are renter-occupied units and the remainder are owner-occupied homes. Making HUD funds available for rehabilitation of these properties would allow many of these units to remain in the housing stock and also target assistance to those who need it the most. Table 7 of NA-10 Housing Needs Assessment breaks down those who have one or more housing problems by income and housing tenure. About 90% of renters at or below 80% experience one or more housing problems, compared to 63.47% of homeowners at or below 80% AMI. This shows the disproportionate impact that cost burdens have had on the renter population of the state.

Estimated Number of Housing Units Occupied by Low or Moderate Income Families with LBP Hazards

According to Table 38, a total of 763,220 owner-occupied housing units in Georgia were built before 1980. A total of 79,025 of these owner-occupied units are occupied by families with children. There are 510,335 rental units in the state built before 1980, 106,825 of which are occupied by households with children. These numbers represent an increase from the last Consolidated Plan. Typically, units built prior to 1950 are the most likely to have lead-based paint present somewhere in the home. According to the latest ACS data, 6% of Georgia's owner-occupied housing units and 8% of Georgia's renter-occupied units were built prior to 1950. Using this measure, over 244,834 homes in Georgia potentially have the presence of lead.

MA-25 Public and Assisted Housing – (Optional)

Introduction:

This section is optional for States to complete and DCA opts not to do so.

Table 41 – Total Number of Units by Program Type

Program Type									
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project -based	Tenant -based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers available									
# of accessible units									
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

Data Source: PIC (PIH Information Center)

Describe the supply of public housing developments:

N/A

Describe the number and physical condition of public housing units in the jurisdiction, including those that are participating in an approved Public Housing Agency Plan:

N/A

Describe the Restoration and Revitalization Needs of public housing units in the jurisdiction:

N/A

Describe the public housing agency's strategy for improving the living environment of low- and moderate-income families residing in public housing:

N/A

MA-30 Homeless Facilities – 91.310(b)

Introduction

This section discusses homeless facilities, including emergency shelter beds, transitional housing beds, and permanent supportive housing beds, available to homeless persons in Georgia. This section also discusses mainstream services complementing the provision of these homeless facilities.

Table 42 - Facilities Targeted to Homeless Persons

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds	Current & New	Current & New	Under Development
Households with Adult(s) and Child(ren)	843	98	639	875	0
Households with Only Adults	722	0	216	1575	10
Chronically Homeless Households	0	0	0	473	10
Veterans	0	0	24	425	0
Unaccompanied Youth	2	0	9	0	0

Data Source: 2017 Housing Inventory Count for the Balance of State Continuum of Care

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Describe mainstream services, such as health, mental health, and employment services to the extent those services are used to complement services targeted to homeless persons

Most of the mainstream provider agencies that complement services to homeless persons are community service boards (CSB). Routinely, these provider organizations are the community mental health providers and provide a comprehensive array of services to those with behavioral health and addictive disease needs. Many of the CSBs are ESG and CoC funded Shelter Plus Care or PSH provider agencies that coordinate housing opportunities and assist in engagement of services with the individual. Furthermore, these CSBs are the providers of supported employment, an evidence based practice for getting persons engaged in meaningful working opportunities. Recently, the Department of Behavioral Health and Developmental Disabilities have promoted this service as an evidenced-based practice based on fidelity.

List and describe services and facilities that meet the needs of homeless persons, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. If the services and facilities are listed on screen SP-40 Institutional Delivery Structure or screen MA-35 Special Needs Facilities and Services, describe how these facilities and services specifically address the needs of these populations.

As of January 2017, Georgia's Balance of State Continuum of Care contained 1,567 emergency shelter beds (Georgia Balance of State Continuum of Care). 49% (767) of the emergency shelter beds within the Balance of State Continuum of Care are reserved specifically for victims of Domestic Violence.

As of January 2017, Georgia Balance of State Continuum of Care contained 855 transitional housing beds. Approximately 38% (329) of the transitional housing beds within the Balance of State Continuum of Care are reserved specifically for victims of Domestic Violence.

Within the Balance of State CoC bed inventory, in January 2017, approximately 53% of all shelter beds and 75% of all transitional beds were reserved for households with children. Many shelter and transitional programs have the ability to serve various household types based on need.

Within the Balance of State CoC, there were 2,450 Permanent Supportive Housing Beds as of January 2017 and another ten under development. Approximately 20% of these beds are reserved for individuals and families experiencing chronic homelessness. Approximately 17% of these beds are reserved for Veterans and Veteran families. These units are funded with Shelter Plus Care and the supportive services are funded through various state and federal programs administered by State agencies and local nonprofits.

While the HOPWA program does not target homeless populations, many of those assisted with those funds are homeless or at risk of becoming homeless. HOPWA has several eligible funding categories related to housing that assist homeless persons living with HIV/AIDS. Tenant-Based Rental Assistance (TBRA) allows homeless persons to enter into leases in their own names while receiving temporary financial assistance based on their incomes. TBRA typically lasts between one to three years, depending on the needs and progress of each individual household. Rental assistance is coupled with supportive services to help those households increase income, access mainstream benefits, and improve their life

skills. As reported in the most recent HOPWA CAPER (September 2017), 175 individuals were assisted with TBRA during a one-year period.

TBRA is often coupled with another type of HOPWA housing assistance, Permanent Housing Placement (PHP). PHP is a form of extremely short-term, one-time assistance that provides funds for initial placement in a rental property. PHP can include first month's rent, along with any necessary utility or rental deposits. This assistance can help homeless individuals living with HIV/AIDS get into a property, with TBRA starting after they are established in their apartments. As reported in the most recent CAPER, 65 individuals received PHP assistance during a one-year time span.

The HOPWA program also funds facility-based housing that is available to homeless persons living with HIV/AIDS. Facility-based housing can be both short-term and long-term. Facility-based housing is operated and maintained by the Project Sponsors that DCA funds through HOPWA. During the last one-year period covered by the most recent CAPER, 35 individuals resided in long-term permanent housing that was facility-based, and 20 were placed in short-term or transitional facilities before more permanent housing solutions could be established. The Ryan White Part B program, through the Department of Public Health, also funds short-term housing that many HOPWA clients avail themselves of prior to entering permanent housing programs.

DCA also coordinates its housing efforts with the nine other ESG entitlement areas throughout the state, as well as the eight CoCs not within the Balance of State. These entitlement areas and CoCs also fund homeless programs that augment the efforts of the State. These services include emergency shelter, rapid re-housing, homeless prevention, and street outreach. Each entitlement area and CoC sets their own local priorities. Local ESG entitlement priorities help inform DCA's funding distribution in those areas.

MA-35 Special Needs Facilities and Services – 91.310(c)

Introduction

This section discusses the type of special needs facilities and services designated or available for people with HIV/AIDS and their families.

Table 43 – HOPWA Assistance Baseline

Type of HOPWA Assistance	Number of Units Designated or Available for People with HIV/AIDS and their families
TBRA	175
PH in facilities	35
STRMU	60
ST or TH facilities	20
PH placement	65

Data Source: HOPWA CAPER and HOPWA Beneficiary Verification Worksheet

To the extent information is available, describe the facilities and services that assist persons who are not homeless but who require supportive housing, and programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing

The following services and facilities are available in Georgia's 126-county HOPWA jurisdiction to assist people living with HIV/AIDS, including those returning from an institutional setting. Other direct service providers that are not listed (such as medical establishments and other nonprofits) also deliver services to individuals with HIV/AIDS that are funded by various federal, state, local, and private funds.

- Action Ministries, Inc. offers facility based housing, tenant-based rent assistance, permanent housing placement, short-term rent, mortgage and utility assistance and supportive services including case management, food, life skills, employment assistance and referrals to persons living with HIV/AIDS in Northeast Georgia.
- AIDS Athens, Inc. offers facility based housing including short-term emergency housing assistance and transitional housing, tenant-based rent assistance, short-term rent, mortgage, utility assistance and supportive services including case management, food, substance abuse treatment, support groups, life skills, employment assistance, transportation assistance, ID to persons living with HIV/AIDS in Athens.
- Comprehensive AIDS Resource Encounter, Inc. provides short-term rent, mortgage and utility assistance, permanent housing placement assistance and supportive services including case management and transportation assistance to persons living with HIV/AIDS in Jesup.
- Homeless Resource Network, Inc. provides tenant-based rental assistance, permanent housing placement assistance, short-term rent, mortgage and utility assistance and supportive services including case management to persons living with HIV/AIDS in metropolitan Columbus.
- Living Room, Inc. provides tenant-based rental assistance, permanent housing placement assistance, short-term rent, mortgage and utility assistance and supportive services including case management and housing persons living with HIV/AIDS in Northwest Georgia. They also provide services in Metropolitan Atlanta area.

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- Lowndes County Board of Health (d/b/a South Health District) provides tenant-based rental assistance, permanent housing placement assistance, short-term rent, mortgage and utility assistance, short-term emergency housing assistance and Supportive Services including case management, financial management and budgeting to persons living with HIV/AIDS in Valdosta.
- Union Mission, Inc. provides Facility based housing, tenant-based rental assistance, permanent housing placement assistance, short-term rent, mortgage and utility assistance and supportive services including case management, mental health and substance abuse treatment to persons living with HIV/AIDS in Savannah.
- The HOPE Center provides tenant-based rental assistance and supportive services including case management and transportation assistance to persons living with HIV/AIDS in Macon.
- Laurens County Board of Health provides tenant-based rental assistance, permanent housing placement assistance and supportive services including case management and transportation assistance to persons living with HIV/AIDS in Dublin and Middle Georgia.

Two initiatives formally move persons from institutional care to the community-based integrated settings. The Georgia Department of Behavioral Health and Developmental Disabilities has received state funding for additional housing and community based supported services for persons who are leaving institutional settings including state psychiatric hospitals, psychiatric residential treatment facilities, and nursing home placements. The Georgia Department of Community Health has a grant to transition persons in nursing homes to community based settings using various waiver programs. This Money Follows the Person Demonstration Grant allows transitional assistance for a full year, providing the individual startup funds to cover costs for community integrated housing options, including security deposits, first month's rent, environmental modifications, and other related technology and services to assist the person in being re-integrated to the community. The persons served by the MFP grant include those with physical disabilities, developmental disabilities, traumatic brain injury and seniors.

Describe programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing

The Department of Behavioral Health and Developmental Disabilities and Department of Community Health efforts discussed above are two initiatives to formally move persons from institutional care into community-based integrated settings.

Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. 91.315(e)

- DCA will continue to administer the HOPWA Program in order to serve low-income persons living with HIV/AIDS.
- DCA committed to set aside Housing Choice Vouchers in FY 2012 through the HCV Program for the Department of Behavioral Health and Developmental Disabilities individuals who are currently on the state-funded Georgia Housing Voucher Program (GHVP). DCA will transfer households from the GHVP to DCA's HCV Program to free up state-funded GHVP vouchers so new DBHDD individuals can receive state-funded rental assistance accompanied by transitional and bridge funding for costs associated with moving to the community from institutional placement. The GHVP is designed to assist the hardest to house Settlement Agreement consumers in a Housing First Model.
- The State of Georgia was awarded two HUD Section 811 Project Rental Assistance Demonstration Grants in 2012 and 2013. The HUD Section 811 Project Rental Assistance Demonstration Program (HUD 811) will enable the state to expand its efforts to transition individuals from institutional to integrated, community-based settings. HUD 811 is a cooperative effort between Housing and Urban Development and Health and Human Services at the federal level and the Department of Community Affairs, Department of Community Health and Department of Behavioral Health and Development Disabilities at the state level. The program will involve private sector and nonprofit developers and organizations in the provision of 485 units of subsidized housing for the most vulnerable within the population -- extremely low-income persons with disabilities. This program is expected to be at full capacity by September 2021.

For entitlement/consortia grantees: Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. (91.220(2))

N/A

MA-40 Barriers to Affordable Housing – 91.310(d)

Negative Effects of Public Policies on Affordable Housing and Residential Investment

Public policy related to the cost of housing and the incentives to develop, maintain, or improve affordable housing vary widely through the State and are typically affected by local policies over which the State has little control.

Consultation with stakeholders and residents revealed some key barriers to affordable housing in Georgia:

Local laws and zoning:

- Georgia's status as a "home rule" state means that a patchwork of local laws govern land use. Some communities' zoning prevents developments of a certain density—including multifamily development—or type of housing unit, such as a group home.
- In contrast, a lack of legal clarity—unclear titles on heir properties, or unenforced code enforcement—prevent other development. Empty or abandoned heir properties cannot be demolished, while inhabited heir properties without adequate documentation may not be able to participate in homeowner rehabilitation programs.

Local and regional economic forces:

- Some private housing providers' requirements, like background checks and an unwillingness to accept tenants using rental assistance, prevent potential residents from accessing their units.
- Wages in the service and industrial sectors may not support market-rate units.
- A shortage of contractors and building supplies drive up the price of constructing additional units.

MA-45 Non-Housing Community Development Assets -91.315(f)

Introduction

This section presents the State of Georgia's non-housing community development assets and needs, as well as State efforts to encourage economic growth.

Table 44 – Economic Development Market Analysis/Business Activity by Sector

Business by Sector	Number of Workers	Number of Establishments	Share of Total Workers
00-Total for all Sectors	3,692,490	224,593	
11 Agriculture, forestry, fishing, and hunting	7,530	952	0.20%
21 Mining, quarrying, and oil and gas excavation	5,435	199	0.15%
22 Utilities	24,886	602	0.67%
23 Construction	164,767	16,958	4.46%
31-33 Manufacturing	365,088	7,432	9.89%
42 Wholesale trade	204,669	12,928	5.54%
44-45 Retail trade	468,517	34,041	12.69%
48-49Transportation and warehousing	176,600	6,597	4.78%
51 Information	118,864	4,089	3.22%
52 Finance and insurance	173,080	14,777	4.69%
53 Real estate and rental leasing	59,555	11,259	1.61%
54 Professional, scientific, and technical services	252,351	29,216	6.83%
55 Management of companies and enterprises	124,169	1,733	3.36%
56 Administrative and support and waste management and remediation services	377,195	12,324	10.22%
61 Educational Services	83,713	3,041	2.27%
62 Health care and social assistance	478,276	24,207	12.95%
71 Arts, Entertainment and recreation	46,741	3,058	1.27%
72 Accommodation and food service	403,873	19,704	10.94%
81 Other Services(except public administration)	156,605	20,994	4.24%
99 Industries not classified	482	576	0.01%

Data Source: 2010 – 2014 ACS (Workers), 2014 Longitudinal Employer-Household Dynamics (Jobs)

Table 45 – Labor Force

Total	**8,085,411**
In labor force	5,085,287
Civilian Employed Population 16 years and over	5,036,476
Unemployed	300,529
Unemployment Rate	6.0%
Unemployment Rate for Ages 16-24	14.9%
Unemployment Rate for Ages 25-65	4.9%
Armed Forces	48,811
Not in labor force	3,000,124

Data Source: 2016 ACS 1-Year Estimate

Table 46 – Occupations by Sector

Occupations by Sector	**Number of People**
Management, business and financial	1,725,960
Farming, fisheries and forestry occupations	29,009
Service	790,251
Sales and office	1,142,562
Construction, extraction, maintenance and repair	247,956
Production, transportation and material moving	631,064

Data Source: 2010 – 2014 ACS

Table 47 – Travel Time

Travel Time	**Number**	**Percentage**
Less than 10 minutes	443,647	10%
< 30 Minutes	2,097,970	47%
30-59 Minutes	1,391,727	32%
60 or More Minutes	484,323	11%
Total	4,417,667	100%

Data Source: 2010 – 2014 ACS

Table 48 – Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	**Total**	**In Labor Force**		
		Civilian Employed (%)	**Unemployed (%)**	**Not in Labor Force (% Change)**
Population 25 to 64 years old	5,309,738	76%	8%	-16%
Less than high school graduate	687,010	58%	14%	-28%
High school graduate (includes equivalency)	1,450,805	70%	10%	-20%
Some college or Associate's degree	1,566,956	78%	8%	-14%
Bachelor's degree or higher	1,604,967	86%	4%	-10%

Data Source: 2011 – 2015 ACS 5- Year

Table 49 –Educational Attainment by Age

	Age				
	18–24 yrs	**25–34 yrs**	**35–44 yrs**	**45–65 yrs**	**65+ yrs**
Less than 9th grade	20,536	50,226	69,020	107,565	107,796
9th to 12th grade, no diploma	144,033	120,192	112,386	210,047	145,394
High school graduate, GED, or alternative	331,738	347,357	335,392	761,695	439,636
Some college, no degree	385,200	334,431	278,127	529,788	251,859
Associate's degree	39,186	109,023	118,983	213,853	76,349
Bachelor's degree	86,222	306,689	277,185	498,306	188,095
Graduate or professional degree	7,451	135,824	194,354	315,818	150,005

Data Source: 2011 – 2015 ACS 5-Year

Table 50 – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months		
	Total	**Male**	**Female**
Less than high school graduate	$36,223	$41,697	$30,865
High school graduate (includes equivalency)	$21,274	$24,725	$15,310
Some college or Associate's degree	$27,706	$31,977	$22,480
Bachelor's degree	$32,448	$41,242	$27,091
Graduate or professional degree	$50,962	$62,471	$41,582

Data Source: 2011 – 2015 ACS 5-Year

Based on the Business Activity table above, what are the major employment sectors within the state?

The top six employment sectors are Manufacturing (9.89%), Retail Trade (12.69%), Professional, scientific, and Technical services (6.83%), Administrative/Support/Waste Management and Remediation services (10.22%), Health Care and Social Assistance (12.95%), and Accommodation/Food Service (10.94%). Cumulatively, these account for approximately 63.52% of Georgia's workforce.

Describe the workforce and infrastructure needs of business in the state.

According to the 2014 High Demand Career Initiative (HDCI) report, workforce needs center primarily in the area of education. Approximately 59.73% of Georgia's workforce has some level of advanced education while 40% has a high school degree or less. The educational needs of businesses in the state vary greatly from a workforce that has received at least a GED to a highly trained workforce in some of the newer business sectors to the state, such as bio-science. This disparate gap leads to a demand for basic educational skills, increased soft skills, and advanced skills. Another concern of businesses in the state is the aging workforce. As demonstrated in Table 45, Georgia's workforce is made up of older individuals. As these trends continue there will be an increasing need in worker replacement as workers retire.

Infrastructure needs are primarily in the areas of advanced manufacturing, industrial construction, telecommunication, transportation, and energy. Transportation needs include improvements to Georgia's ports, and improvements to the state's major transportation network of roads, rail and air.

Describe any major changes that may have an economic impact, such as planned public or private sector investments or initiatives that have affected or may affect job and business growth opportunities during the planning period. Describe any needs for workforce development, business support or infrastructure these changes may create.

Major changes have been seen in the development of concentrated workforce development programs, including: The Strategic Industries Workforce Development Grant, changes to state education policies allowing for increased impact of computer programming courses, veteran employment through the Military Academy Training Center (MATC), a skilled trade program for youth known as Go Build Georgia, and increased integration of the state college system through the Complete College Georgia program. These changes are expected to shift jobs towards more skills based.

How do the skills and education of the current workforce correspond to employment opportunities in the state?

There are currently gaps between the demand for jobs from growing industries, such as film, and the skills that are available in the state's workforce. For example, the UGA Center for Agribusiness and Economic Development identified that University System of Georgia Institutions were only producing 55% of the needed graduates for agricultural fields in 2014. However, the State has been making concerted efforts in partnership with organizations across the state. The state has begun to see the fruits of these efforts in recent years. Specifically, this has been pursued through the governor's office High Demand Career Initiative. This initiative connects schools in the states college system with industry partners. In doing so, specific needs were identified that were used to make changes to how colleges plan and offer courses and new programs.

Describe current workforce training initiatives supported by the state. Describe how these efforts will support the state's Consolidated Plan.

The State is committed to supporting employment opportunities by using an economic development set-aside under the CDBG Method of Distribution that supports efforts for job creation and retention. Other State efforts include the State Small Business Credit Initiative, an initiative of the U.S. Department of Treasury that is intended to increase access to capital for small businesses. The State has employed the use of 11 primary tax credits to encourage the creation and retention of businesses and job growth: job tax credit; quality jobs tax credit; port tax credit bonus; work opportunity tax credit; mega project tax credit; investment tax credit; research and development tax credit; retraining tax credit; film television and digital entertainment tax credit; musical tax credit.

Describe any other state efforts to support economic growth.

See efforts described above.

Discussion

Georgia's economy is projected to continue the strong growth of recent years. In 2017, the state's GDP was estimated to grow by 302 percent which is faster than the national average. In addition, the state's personal income level will rise by as much as 5.0 percent in 2017. The last five years have seen numerous large-scale projects moving to the state, siting in both urban and rural counties. Multiple job clusters have begun to spring up across the state leading to a diversified portfolio of economic development which will be a great asset as we bring more affordable housing options to our residents.

MA-50 Needs and Market Analysis Discussion

Are there areas where households with multiple housing problems are concentrated? (Include a definition of "concentration")

Georgia has a total of 159 counties, many of which have an aging housing stock and multiple households below 80% of median income. Areas that are concentrated would be those that have high percentages of one or more of the following housing problems as a share of their total households: lacking complete kitchen facilities, lacking complete plumbing facilities, overcrowded, and housing cost burdened. Additionally, the counties marked "*", "**", or "***" are contiguous, another means of determining geographic concentration.

Using the HUD Affirmatively Furthering Fair Housing online tool, the counties with the highest "concentration" of these issues, in no particular order, are: Fulton County* (38.93%), Clayton County* (44.64%), DeKalb County* (41.36%), Gwinnett County* (38.37), Clarke County (40.98%), Newton County (38.87%), Troup County (38.50%), Wilkes County (42.11%), Bibb County (39.80%), Jenkins County (38.45%), Chatham County (39.01%), Ben Hill County** (39.03%), Turner County** (39.43%), Dougherty County*** (42.13%), Baker County*** (40.73%), and Brooks County (40.26%).

Are there any areas in the jurisdiction where racial or ethnic minorities or low-income families are concentrated? (Include a definition of "concentration")

ACS data from 2016 shows that Georgia is 59.8% white with 40.2% being minorities. Any county where the population is greater than 50% minority would be considered an area of minority concentration. A total of 30 of Georgia's 159 counties have minority populations greater than 50%.

Using the HUD Affirmatively Furthering Fair Housing online tool, counties that represent a concentration are those that meet the 50% criteria, are contiguous, and cluster around the state, these include: The Randolph Cluster (Composed of Randolph County, Clay County, Calhoun County, and Dougherty County), The Warren Cluster (Composed of Warren County, Taliaferro County, Hancock County, Washington County, Jefferson County, and Richmond County), The Macon Cluster (Composed of Macon County, Sumter County, Dooly County, and Peach County), and The DeKalb Cluster (Composed of DeKalb County, Fulton County, Clayton County, and Gwinnett County)

What are the characteristics of the market in these areas/neighborhoods?

Many of these neighborhoods have a high concentration of minorities and/or low-income individual, populations with a demonstrated need for relief of housing problems, particularly those related to cost burdens. As shifts in demographics continue in the state (older and more diverse), we can expect cost burdened populations to continue to increase in number. At the same time, these areas can often have a fair stock of unutilized, blighted residential properties or underutilized properties of formerly different use.

Are there any community assets in these areas/neighborhoods?

There are a number of qualified and concerned community-based organizations that operate in these areas. Many are faith-based and take a holistic approach to community improvement while others focus on areas such as crime, housing, health care, schools, child care, and employment.

Are there other strategic opportunities in any of these areas?

The number of vacant units in many of these neighborhoods that are currently contributing to blight and crime could also be viewed as opportunities. Acquiring funds for the acquisition and rehabilitation of blighted residential properties or the adaptive reuse of other structures can be a notable way to increase the housing stock. In this way, we reduce pressures on cost burdened residents.

Strategic Plan

SP-05 Overview

Strategic Plan Overview

Geographic Priorities

The State strives to balance its resources across all regions of Georgia. While the State does not allocate specific funds based upon geographic priority, geographic balance is a priority for most programs. Most of the funding awarded under the CDBG, HOME, NHTF, ESG, and HOPWA programs is based upon competitive application processes. Eligibility for these processes are limited to applicants not directly receiving HUD funds for the same program.

Priority Needs

Georgia has a high need for the State's services in addressing challenges in housing, homelessness, non-homeless special needs, and community development. The State has prioritized most of these needs as "high."

Housing

- Georgia has a *high* need for affordable rental housing. The State will meet this need by constructing and rehabilitating affordable rental housing with HOME and NHTF funds.
- Georgia's need for utilizing HUD funds to address homeownership housing preservation and development is relatively *low*. Homeowners across the State can utilize non-federal sources of funds, such as GeorgiaDream and HomeSafe Georgia, to meet their needs.

Homelessness and non-homeless special needs

- Across Georgia, communities participating in Consolidated Plan goal development identified homelessness as a key concern. The needs for homelessness outreach, emergency shelter, and rapid-rehousing are *high*. The State will dedicate funds to identifying potentially homeless individuals and placing them in permanent housing as quickly as possible. It may or may not be necessary to enter a shelter prior to placement. Housing assistance to individuals with HIV/AIDS is also a *high* concern.
- Homelessness prevention—dedicating funds to keeping individuals in their homes—is a relatively *low* priority. The State recognizes the existence of other, non-federal sources of funds for this purpose.

Community development

- Georgia exhibits a *high* need for investment in public facilities, including public buildings, infrastructure, and addressing immediate threat and danger concerns.
- Georgia's needs for job creation, through economic development and redevelopment investment, are also *high*.

Influence of Market Conditions

Almost half (41%) of all Georgia households have total income not greater than 80% of the area median income for their communities. Rising housing costs, and decreasing vacancy rates, will increasingly burden these households. Homeless and non-homeless special needs individuals are even more vulnerable to these trends. These pressures necessitate investment in the construction and rehabilitation of affordable rental units, as well as housing assistance and outreach to the homeless and non-homeless special needs population of Georgia.

Anticipated Resources

The State leverages all available resources to maximize impact of HUD's investment in Georgia. The State utilizes a number of matching funds and additional resources to address Georgia's priority needs. These funds are available, in addition to the funds provided by HOME, ESG, HOPWA, NHTF, and CDBG Programs:

- Rental construction and rehabilitation
    - State and Federal Low-Income Housing Tax Credits
- Rental assistance
    - Housing Choice Vouchers
    - Section 811 Project Rental Assistance
- Homeownership
    - HomeSafe Georgia – home loan assistance and mortgage modification
    - GeorgiaDream Homeownership Program – affordable mortgage financing
- Homelessness and non-homeless special needs
    - Continuum of Care Program Permanent Supportive Housing
    - State Housing Trust Fund

Additionally, the State of Georgia seeks support for policy development from the nonprofit sector. DCA has partnered with the Kresge Foundation to fund an innovative health program with Public Housing Authorities participating in HUD's Rental Assistance Demonstration Program. Partners in both public health and green building will lead several PHAs across the state through an interactive peer-learning academy and provide pre- and post-rehabilitation data tracking to show the benefits for tenants of healthy green building and enhanced health services. DCA is the HOME lender, the Housing Tax Credit provider, and the organizing entity of this effort.

Institutional Delivery Structure

A complex web of partners work with the State to implement activities funded by CDBG, HOME, NHTF, ESG, and HOPWA programs. ESG, HOPWA, Supportive Services for Veteran Families and Shelter Plus Care programs work together to support vulnerable populations through regional Continua of Care. HOME and NHTF rely on for-profit and nonprofit developers and public housing authorities to construct and rehabilitate affordable rental units. CDBG awards funds to local governments to construct vital local infrastructure and housing development activities.

Barriers to Affordable Housing

Local governments across Georgia control their own development and zoning policies, which may result in the creation of barriers to affordable housing. The State seeks to educate local governments on these challenges through the Georgia Initiative for Community Housing (GICH). The State also provides training and technical assistance with local planning efforts.

Homelessness Strategy

The State is dedicated to reaching out to homeless persons (especially unsheltered persons) and assessing their individual emergency and transitional housing needs. DCA will utilize ESG and HOPWA funds to facilitate homeless individuals' transition to permanent housing and independent living.

Lead-based Paint Hazards

The state has fully incorporated HUD lead-based paint requirements into all of its federally-funded housing programs for units constructed prior to 1978.

Anti-Poverty Strategy

The State of Georgia offers a number of workforce development initiatives. DCA has aligned its affordable housing strategies, as implemented by HOME, NHTF, and CDBG, to maximize the impact of these anti-poverty strategies.

Monitoring

DCA carries out extensive monitoring activities to ensure that all federal requirements are met through the compliance period and that the recipients are serving individuals and families at the level they stated they would. These activities include desk reviews, unit inspections, and on-site reviews. Staff works with those recipients not meeting these requirements by providing technical and other assistance to improve their performance.

SP-10 Geographic Priorities – 91.315(a)(1)

Table 51 - Geographic Priority Areas

1	Area Name:	Non-entitlement Areas within the State
	Area Type:	Jurisdictions that do not receive HUD entitlement funds
	Other Target Area Description:	Jurisdictions that do not receive HUD entitlement funds
	HUD Approval Date:	
	% of Low/ Mod:	
	Revitalization Type:	
	Other Revitalization Description:	
	Identify the neighborhood boundaries for this target area.	
	Include specific housing and commercial characteristics of this target area.	
	How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	
	Identify the needs in this target area.	
	What are the opportunities for improvement in this target area?	
	Are there barriers to improvement in this target area?	
2	Area Name:	Entitlement and Non-entitlement Areas within the State
	Area Type:	Includes all areas within the State regardless of entitlement status
	Other Target Area Description:	Includes all areas within the State regardless of entitlement status
	HUD Approval Date:	
	% of Low/ Mod:	
	Revitalization Type:	
	Other Revitalization Description:	
	Identify the neighborhood boundaries for this target area.	
	Include specific housing and commercial characteristics of this target area.	
	How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	
	Identify the needs in this target area.	
	What are the opportunities for improvement in this target area?	
	Are there barriers to improvement in this target area?	

General Allocation Priorities

Allocations for the CDBG, HOME, ESG, NHTF, and HOPWA Programs are mostly made on a competitive basis through annual application processes. In the CDBG Program, applicants must be HUD non-entitlement communities. For ESG, NHTF, and HOME, applicants may apply for funds for any area of the State. Additional program-specific information is included below.

NHTF

The distribution of the NHTF will be used to increase the supply of affordable rental housing units for extremely low-income (ELI) households with incomes at or below 30% of Area Median Income (AMI). As with the current allocations for CDBG, HOME, ESG, and HOPWA Programs, the NHTF will be made on a competitive process through an annual application process, which will be distributed directly to owner/developers of affordable housing through Notices of Funding Availability (NOFA). These notices will be made available through DCA's website and additional communication channels. Those interested in joining DCA's Housing Finance and Development distribution list can sign-up through DCA's Housing Finance and Development website. The State does not use allocation priorities on a geographic system, nor does the state dedicate specific percentages or amounts of funding to particular targeted areas for the programs listed above. The geographic distribution priorities are consistent with the State's current consolidated plan of record. The criteria for the NHTF are outlined in the allocation plan through DCAs website

ESG & HOPWA

The State does not anticipate any funding set-asides for specific geographic areas of Georgia for the ESG or HOPWA programs. The State prioritizes the Georgia Non-entitlement area and the Balance of State CoC geographic areas for the distribution of ESG funds. The State will allocate a minimum of 65% of ESG funds in the annual competition to the Georgia Non-entitlement geographic area.

By formula, HOPWA funds are allocated to eligible states and Eligible Metropolitan Statistical Areas (EMSAs) based on the numbers of people living with HIV or AIDS in those areas. States and metropolitan areas coordinate use of HOPWA funds with their respective Consolidated Plans, a collaborative process, which establishes a unified vision for community development actions. In Georgia, HUD provides HOPWA formula funds to two (2) other government entities in addition to the State of Georgia. States and metropolitan areas coordinate use of HOPWA funds with their respective Consolidated Plans, a collaborative process, which establishes a unified vision for community development actions. HOPWA eligible metropolitan areas receive their HOPWA allocations directly from the Department of Housing and Urban Development and have specific guidelines and separate processes not included within the State's program.

The HOPWA Program provides resources and incentives to devise long-term comprehensive strategies for meeting the housing needs of low-income Persons living with HIV/AIDS (PLWHA). HOPWA funding is sub-awarded to Project Sponsors including nonprofit agencies, health departments directly working with Persons living with HIV/AIDS (PLWHA) within the communities and or government housing agency. To the extent determined under State law by DCA, private, secular or faith-based nonprofit organizations are also eligible to apply for funds. These agencies are responsible for designing their own rules for programs. Their program policies and design must be within the scope of HOPWA regulations and guidance from HUD.

"HOTMA" is the Housing Opportunity through Modernization Act, or the short title of the bill and subsequent Public Law 114-201. HOTMA included modernization of the HOPWA formula, which was incorporated into the law with other provisions related to HUD. HOTMA was signed into law July 29, 2016.

The law provides that HOPWA modernization, based on "living with HIV" data, will be effective for the 2017 allocation year. Previously, HOPWA funds were allocated to eligible states and Eligible Metropolitan Statistical Areas (EMSAs) that meet the minimum number of cumulative AIDS Cases. The HOPWA Modernization Act has shifted the focus to the changing scenario where with HIV treatment and care more and more people are living with HIV and not developing AIDS. States and metropolitan areas coordinate use of HOPWA funds with their respective Consolidated Plans, a collaborative process, which establishes a unified vision for community development actions. In Georgia, HUD provides HOPWA formula funds to 3 jurisdictions, DCA for 126 counties, City of Atlanta for the Atlanta Eligible Metropolitan Statistical Area (EMSA) including 29 counties and Augusta-Richmond County government for 4 Augusta MSA counties and 2 South Carolina counties.

SP-25 Priority Needs – 91.315(a)(2)

Table 52 – Priority Needs Summary

	Priority Need Name	Priority Level	Associated Goals
1	**Affordable Rental Housing**	**High**	**Construction/Rehabilitation of Rental Units**
	Population:	Extremely Low, Low, Moderate Income; Large families, Families with children, Elderly, Frail Elderly; Persons with Mental Disabilities, Persons with Physical Disabilities, Persons with Developmental Disabilities; Persons with Alcohol or Other Addictions; Persons with HIV/AIDS and their Families; Victims of Domestic Violence	
	Geographic Areas Affected	Includes all areas within the State regardless of entitlement status	
	Description	This activity includes the new construction or rehabilitation of affordable rental housing and tenant-based rental assistance.	
	Basis for Relative Priority	Georgia has many cost-burdened renter families that need quality affordable housing. Additionally, 54.28% of Stakeholder Survey respondents identified "housing for low-income households" as one of the "greatest unmet housing needs" in their area (see Appendix).	
2	**Public Facilities**	**High**	**Buildings;** **Infrastructure; and** **Immediate Threat and Danger Program**
	Population:	Extremely Low, Low, Moderate Income; Large families, Families with children, Elderly; Public Housing Residents; Non-housing Community development	
	Geographic Areas Affected	Jurisdictions that do not receive HUD entitlement funds	
	Description	Local governments throughout the state need financial assistance to allow them to construct buildings where public services are offered as well as infrastructure projects.	
	Basis for Relative Priority	Local governments were hit hard by the housing crisis and the resulting declines in property values impacted their tax bases while the demand for services remains high. Furthermore, the Resident Survey indicates a high need for infrastructural improvements (see Appendix).	
3	**Job Creation**	**High**	**Economic Development; and** **Redevelopment**
	Population:	Extremely Low, Low, Moderate; Large Families, Families with Children, Elderly; Rural; Chronic Homelessness; Individuals; Chronic Substance Abuse; Veterans; Persons with HIV/AIDS; Victims of Domestic Violence; Persons with Mental Disabilities; Persons with Physical Disabilities; Persons with Developmental Disabilities; Persons with Alcohol or Other Addictions; Persons with HIV/AIDS or other Addictions	
	Geographic Areas Affected	Jurisdictions that do not receive HUD entitlement funds	
	Description	Assistance provided to local governments and businesses that result in the creation of jobs for low and moderate-income persons.	
	Basis for Relative Priority	Georgia continues to have unemployment percentages that exceed desirable levels and incentives are often needed to encourage job creation.	

	Priority Need Name	Priority Level	Associated Goals
4	**Rapid Re-Housing**	**High**	**Rapid Re-housing Assistance**
	Population:	Extremely Low, Low, Moderate; Large Families; Families with Children; Elderly, Frail Elderly; Rural; Chronic Homelessness; Individuals; Mentally Ill; Chronic Substance Abuse; Veterans; Persons with HIV/AIDS and their Families; Victims of Domestic Violence; Persons with Mental Disabilities; Persons with Physical Disabilities; Persons with Developmental Disabilities; Persons with Alcohol or Other Addictions;	
	Geographic Areas Affected	Includes all areas within the State regardless of entitlement status	
	Description	Rapid re-housing is designed to get homeless individuals back into permanent housing as quickly as possible. The Stakeholder Survey indicated a high degree of support for rapid re-housing measures. The highest percentage of Stakeholder Survey respondents (57.23%) chose “Emergency shelter for homeless/homeless shelter” as “the greatest unmet housing need” in their area.	
	Basis for Relative Priority	DCA has prioritized rapid re-housing as its principal interventions as it has proven to be effective throughout the nation and many areas of the state do not have any emergency shelters or transitional housing. Survey and engagement efforts reflect support of prioritization of this activity.	
5	**Homeless Outreach**	**High**	**Homeless Outreach Assistance**
	Population:	Extremely Low, Low, Moderate; Families with Children; Rural; Chronic Homelessness; Individuals; Mentally Ill; Chronic Substance Abuse; Veterans; Persons with HIV/AIDS and their Families; Victims of Domestic Violence; Persons with Mental, Physical, and/or Developmental Disabilities; Persons with Alcohol or Other Addictions	
	Geographic Areas Affected	Includes all areas within the State regardless of entitlement status (ESG)	
	Description	Outreach involves identifying persons on the street and bringing them into the system for assessments and referrals so they can be assisted	
	Basis for Relative Priority	Community outreach for the development of the Consolidated Plan also indicated that communities across the State had realized that homelessness was an increasing problem in their areas. Though this includes all areas of the State, DCA recognizes that this is an especially high need in rural areas. There, partners have difficulty in ensuring an accurate Point in Time count of homelessness.	
6	**Homelessness Prevention**	**Low**	**Homeless Prevention Assistance; and HOPWA Short-term Rental Utility Mortgage Assistance**
	Population:	Extremely Low, Low, Moderate; Large Families, Families with Children, Elderly; Rural; Chronic Homelessness; Individuals; Mentally Ill; Chronic Substance Abuse; Veterans; Persons with HIV/AIDS; Victims of Domestic Violence; Persons with Mental Disabilities; Persons with Physical Disabilities; Persons with Developmental Disabilities; Persons with Alcohol or Other Addictions;	
	Geographic Areas Affected	Includes all areas within the State regardless of entitlement status (ESG)	
	Description	Homeless prevention works to keep at-risk individuals and families in their homes rather than have them lose them and become homeless.	
	Basis for Relative Priority	Homeless prevention is a lower priority as DCA prefers the rapid re-housing model but this can be effective for the state's most vulnerable populations. Additionally, studies have shown that this is not an effective intervention. Potential subrecipients can find helpful sources outside of ESG.	

	Priority Need Name	Priority Level	Associated Goals
7	**Homeownership Housing Preservation & Development**	**Low**	**Homeownership Assistance**
	Population:	Extremely Low; Low; Moderate; Large Families; Families with Children; Elderly; Public Housing Residents	
	Geographic Areas Affected	Includes all areas within the State regardless of entitlement status	
	Description	Assistance for homeownership housing including homeowner rehab, new construction, and down payment financial assistance	
	Basis for Relative Priority	State funds (GeorgiaDream) are available to assist with homeownership housing preservation and development. This is reflected in AP-25 Allocation Priorities, where 80% of HOME funds will be allocated to the construction and rehabilitation of rental units, while only 20% will be allocated to homeowner assistance. Furthermore, only 27.73% of Stakeholder Survey respondents noted that "homeownership opportunities" was one of "the greatest unmet housing needs" in their area.	
8	**Emergency Shelter**	**High**	**Emergency Shelter**
	Population:	Extremely Low; Low; Moderate; Large Families; Families with Children; Elderly; Frail Elderly; Rural; Chronic Homelessness; Individuals; Mentally Ill; Chronic Substance Abuse; Veterans; Persons with HIV/AIDS and their Families; Victims of Domestic Violence; Persons with Mental Disabilities; Persons with Physical Disabilities; Persons with Developmental Disabilities; Persons with Alcohol or Other Addictions;	
	Geographic Areas Affected	Includes all areas within the State regardless of entitlement status	
	Description	Emergency shelter typically involves providing the homeless overnight accommodations and transitional housing usually can last up to two years to allow households to learn to live independently.	
	Basis for Relative Priority	Community outreach for the development of the Consolidated Plan indicated that communities were in need of emergency shelter options. Furthermore, the largest share of Stakeholder Survey respondents prioritized "emergency shelter for homeless/homeless shelter" as one of "the great unmet housing needs' in their area.	
9	**HOPWA Housing Assistance**	**High**	**HOPWA TBRA;** **HOPWA Permanent Housing Placement;** **HOPWA Facility-Based Housing; and** **HOPWA Supportive Services**
	Population:	Extremely Low, Low, Moderate; Large Families, Families with Children, Elderly; Rural; Chronic Homelessness; Individuals; Mentally Ill; Chronic Substance Abuse; Veterans; Persons with HIV/AIDS and their Families; Victims of Domestic Violence; Persons with Mental Disabilities; Persons with Physical Disabilities; Persons with Developmental Disabilities; Persons with Alcohol or Other Addictions;	
	Geographic Areas Affected	DCA operates this program within our entitlement area only	
	Description	HOPWA provides housing assistance and opportunities to those with HIV/ AIDS	
	Basis for Relative Priority	The rate of HIV infection is on the rise in Georgia amongst low-income, homeless populations. The rise is especially prevalent in rural areas of the state.	

SP-30 Influence of Market Conditions – 91.315(b)

Table 53 – Influence of Market Conditions

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Tenant-based Rental Assistance (TBRA)	Data from the 2010-2014 CHAS Data Query Tool shown in Table 6 shows that there are a total of 1,446,160 Georgia households with total incomes not greater than 80% of the area median income for those communities. This represents 41% of all Georgia households. Of these households at this income level, 11.7% have at least one household member age 62 or older. The overwhelming problem faced by low- and moderate-income households throughout Georgia is cost burden where they are paying more than 30% of their income toward housing costs. There are a total of 265,358 renter households that meet this criteria and 92% of them are actually paying in excess of 50% of their income for housing costs. The number of homeowners paying more than 30% of their income towards housing is 330,445. Of this total, 86% are paying greater than 50% of their income for housing-related expenses. Elderly homeowners face a significant portion of cost burden pressures, leaving them less likely to have the funds needed to maintain their homes properly as their limited income goes towards mortgages, property taxes, insurance, and utilities.
TBRA for Non-Homeless Special Needs	Finding community housing for those being de-institutionalized is a high priority for the State as is providing housing for the disabled. Both groups tend to be at the lowest income levels (0-30% AMI). Georgia has a vacancy rate of 7.8%, which is down from the 2012 9.9% vacancy rate. The declining vacancy rate, coupled with decreasing affordability of housing units makes providing TRBA in Georgia challenging.
New Unit Production	According to the HUD Market-at-a Glance report, vacancy rates for purchased homes markets has steadily declined since the 2010 census falling from 3.4% (2010) to 1.9% (2016). Rental vacancy rates follow this trend as well, falling from 12.4% (2010) to 6.2% (2016). At the same time, annual building activity for single and multifamily housing trends up over the last 6 years. Annual building permits for single-family housing has increased from 14,777 in 2010 to 36,334 in 2016. Multifamily building permits has increased from 2,486 units per year to 15,194 units per year over that same period. According to RealtyTrac, Georgia no longer ranks in the top 5 highest foreclosure rate national list, as it has in recent years. Additionally, this rate has declined since last year and is at 1 in every 3354 housing units, below the national average. The housing market has seen strong growth but a recent issue has been the preservation of constructed affordable housing units.
Rehabilitation	Rehabilitation of both rental and homeownership units is a high priority. The 2016 vacancy rate in Georgia for rental units is 7.8%, which is down from the 2012 9.9% vacancy rate. The declining vacancy rate, coupled with decreasing housing affordability illustrates the importance of the rehabilitation of homeowner and rental housing units.
Acquisition, including preservation	Acquisition and preservation will be a low priority with the exception of addressing situations where housing is either blighted or unfinished. The acquisition, completion, and sale or rental of these properties will be a high priority throughout the State.

SP-35 Anticipated Resources - 91.315(a)(4), 91.320(c)(1,2)

Introduction

This section summarizes the expected amount of anticipated resources available in Year 1 of the Consolidated Plan (FY18), compared to the expected amount available for Years 2-5 (FY18-FY22).

Table 54 - Anticipated Resources

Program	Source of Funds	Use of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of Con Plan	Narrative Description
			Annual Allocation	Program Income	Prior Year Resources	Total		
CDBG	Public-federal	Acquisition	37,000,000	750,000	7,000,000	44,750,000	179,000,000	Required match plus additional leverage will be used with federal funds
		Admin and Planning						
		Economic Development						
		Housing						
		Public Improvements						
		Public Services						
HOME	Public-federal	Acquisition	15,237,392	6,000,000	9,092,163	30,329,555	84,949,568	Funds will be used in conjunction with other non-federal funds for leverage and to ensure that minimal HOME funds are invested in each project.
		Homebuyer Assistance						
		Homeowner rehab						
		Multifamily rental new construction						
		Multifamily rental rehab						
		New construction for ownership						
		TBRA						
NHTF	Public-federal	Rehabilitation for rental	$4,427,950	0	$3,313,674	$7,741,624	$17,711,800	Funds will be used in conjunction with other non-federal funds for leverage and to ensure that minimal NHTF funds are invested in each project.
		New construction for rental						

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HOPWA	Public-federal	Permanent housing in facilities	2,627,118	0	0	2,627,118	12,296,500	Funds will be leveraged as much as possible with other sources and subrecipients will be required to show sources of matching funds.
		Permanent housing placement						
		Short-term or transitional housing facilities						
		STRMU						
		Supportive Services						
		TBRA						
ESG	Public-federal	Financial assistance	4,246,371	0	0	4,246,371	16,985,484	Required match plus additional leverage will be used with federal funds.
		Overnight shelter						
		Rapid re-housing (rental assistance)						
		Rental assistance services						
		Transitional housing						

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Allocation Amount Contingency Provision

Please note that all funding levels shown are estimated amounts. Pursuant to U.S. Department of Housing and Urban Development (U.S. HUD) Notice: CPD-18-01: Guidance on Submitting Consolidated Plans and Annual Action Plans for FY 2018, the Georgia Department of Community Affairs (DCA) notes that all proposed activities' budgets (including CDBG, HOME, NHTF, HOPWA, and ESG) will be proportionally increased or decreased from the estimated funding levels stated above to match actual allocation amounts. Final allocation amounts will be available after U.S. HUD plan approval and submission of form SF-424.

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

ESG

The ESG program requires a 100% match, and may be either cash or in-kind. The vast majority of these resources come from local Project Sponsors. Project Sponsors are sub-recipients of ESG funds and may include nonprofits, faith-based agencies, Community Action Agencies, Community Service Boards, and local municipalities. The State Housing Trust Fund (HTF) leverages the ESG program by providing funding to supplement HUD eligible activities. HTF funds are used to fund supportive services, hotel motel vouchers, training for sub-recipients, HMIS, and Coordinated Entry.

HOPWA

The HOPWA program does not have a match requirement, but Project Sponsors are expected to leverage other resources to support their programs. Project Sponsors are sub-recipients of HOPWA funds that include nonprofit agencies and local Boards of Health. Most HOPWA agencies leverage resources from their local Ryan White Part B clinics for medical care and treatment, case management, transportation to and from medical appointments, and short-term emergency lodging. Several HOPWA programs link their services to the Shelter Plus Care program, which subsidizes permanent supportive housing. HOPWA agencies also use private donations and funding to support their programs, and several access foundation grants for that purpose.

NHTF

Given the 30% AMI income targeting requirements for the NHTF program, viable developments using these funds will need additional sources of funding. Applicants that are able to provide non-federal sources of funding will have a competitive advantage as set forth in the NHTF Allocation Plan.

CDBG

CDBG awards over $300,000 have a Cash Match requirement. The Cash Match requirement is 5% of CDBG funds from $300,001 to $750,000, and 10% of CDBG funds from $750,001 to $1,000,000. Grants receive points in the competitive process for Leverage, which is additional resources provided to the project above and beyond the Cash Match requirement. Leverage resources may be cash, equipment, land or in-kind services. Up to 25 points can be awarded based on per capita leverage amounts.

HOME

The HOME funded single-family development program provides up to 10 points out of a total of 100 points in the competitive application to applicants who provide matched funds. HOME is used as gap financing in the construction of affordable rental units, in partnership with State and Federal Low-Income Housing Tax Credits.

If appropriate, describe publicly owned land or property located within the state that may be used to address the needs identified in the plan

No publicly owned land or property located within the state is used to address the needs of the ESG and HOPWA programs identified in this plan. It is possible that locally owned property may be used for projects seeking funding through the competitive application processes for CDBG, HOME, and/or NHTF. That is not a requirement, however, and that would be a local determination that DCA would have no way of knowing if that was the case at this time.

SP-40 Institutional Delivery Structure – 91.315(k)

Explain the institutional structure through which the jurisdiction will carry out its consolidated plan including private industry, nonprofit organizations, and public institutions.

Table 55 - Institutional Delivery Structure

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
GA Dept. of Behavioral Health & Dev. Disabilities	Government	Homelessness Planning Special Needs Rental	State
GA Dept. of Community Health	Government	Homelessness Planning Special Needs	State
GA Dept. of Public Health	Government	Homelessness Planning Special Needs	State
State Housing Trust Fund for the Homeless	Government	Homelessness Planning	State
GA Dept. of Community Supervision	Government	Homelessness Planning Special Needs	State
Council of Accountability Court Judges	Government	Homelessness Planning Special Needs	State
Brain and Spinal Injury Trust Fund Commission	Government	Special Needs Planning	State
US Dept. of Veteran Affairs	Government	Homelessness Planning	National
CDBG Grantees	Government	Local Government Services Ownership Rental	Jurisdiction
Community HOME Investment Program (CHIP) Grantees	Government	Ownership	Jurisdiction
Local Authorities	Quasi-Government	Economic Development	Jurisdiction
Private Developers	Developer	Ownership Rental Job Creation	State
Nonprofit Developers	CHDO	Ownership Rental	State
Community Service Boards	Government	Homelessness Planning Rental	Jurisdiction
Community Action Agencies	Nonprofit organizations	Homelessness Planning Special Needs	Region
Statewide Independent Living Council	Nonprofit organizations	Special Needs Planning	State
ESG Entitlement Jurisdictions	Government	Homelessness	Jurisdiction
Private Nonprofit Organizations	Nonprofit organizations	Homelessness Ownership Rental Planning Limited Clientele Services	Region
Faith-based Organizations	Nonprofit organizations	Homelessness Planning Special Needs	Region
Local Governments and Municipalities	Government	Homelessness Planning	Jurisdiction
ESG Entitlement Jurisdictions	Government	Homelessness Planning	Jurisdiction

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Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
City of Atlanta Continuum of Care	Government	Homelessness Planning	Jurisdiction
Tri-Jurisdictional Continuum of Care	Government	Homelessness Planning	Region
Athens-Clarke County Continuum of Care	Government	Homelessness Planning	Jurisdiction
Augusta-Richmond Continuum of Care	Government	Homelessness Planning	Jurisdiction
Columbus-Muscogee Continuum of Care	Government	Homelessness Planning	Jurisdiction
Cobb County Continuum of Care	Government	Homelessness Planning	Jurisdiction
DeKalb County Continuum of Care	Government	Homelessness Planning	Jurisdiction
Fulton County Continuum of Care	Government	Homelessness Planning	Jurisdiction
Savannah-Chatham Continuum of Care	Government	Homelessness Planning	Jurisdiction
Balance of State CoC	Government	Homeless Planning	Jurisdiction

Assess of Strengths and Gaps in the Institutional Delivery System

CDBG

The State of Georgia CDBG program addresses needs in the non-entitlement areas of the state by making grants to local governments. Local governments in these areas range in population from a few hundred people to the maximum population size for non-entitlement areas. This size range means that DCA's government partners have significant differences in capacity—from sophisticated with adequate staffing to part-time staff and limited office hours. Health and safety issues addressed by CDBG, however, are located in all types and sizes of communities, meaning that the State CDBG program must ensure that communities with various capacities have access to much-needed funding. Grant administrators from either Regional Commissions or the private sector fill local capacity voids. However, staff turn-over at Regional Commissions, the local government level, and private consulting firms requires ongoing training and retraining. As Congressional allocations decrease, the State CDBG program has fewer funds for technical assistance and administration, making keeping up with the demands for both educating grantees and providing oversight a continuing challenge.

HOME & NHTF

HOME and NHTF depend on qualified developers and contractors to rehabilitate and construct homes and rental units. HOME and NHTF, through a joint NOFA, enabled a number of qualified CHDOs to enter into the competitive process. The joint NOFA offered additional HOME CHDO funds to qualified CHDOs applying under NHTF. The institutional delivery system refers to more than just the provision of units, however. There are also a number of organizations that have participated in the development of permanent supportive housing units. DCA continues to work with service partners to ensure that HOME- and NHTF-funded developments provide the necessary services to foster residents' independence and success.

ESG & HOPWA

Beginning in January 2018, HUD has mandated that all Continua of Care must implement and have fully functional Coordinated Entry systems and processes in place. Coordinated Entry helps ensure that the homeless individuals and families with the greatest needs and most significant barriers to achieving stable housing are prioritized for services. These Coordinated Entry systems are tailored to meet the local needs of each Continuum of Care and should help reduce duplication of services. Agencies that receive funding from DCA through the Emergency Solutions Grant (ESG) program and the Housing Opportunity for Persons with AIDS (HOPWA) program are required to actively participate in the Coordinated Entry process. By receiving referrals through these systems both ESG and HOPWA programs will assist and house those with the greatest needs in their communities.

In addition, DCA has designated a portion of its ESG funding to support Coordinated Entry efforts in the Balance of State, in particular by providing resources for the Homeless Management Information System (HMIS) implementation in designated point-of-entry sites. HMIS is an integral part of managing housing and bed availability in order to generate accurate and timely referrals within the Coordinated Entry system. HMIS also assists with the prioritization process to create a needs-based system that helps ensure those with the greatest needs and most barriers to housing stability are served first.

The greatest gap in the Coordinated Entry system is that there are simply not enough beds available to meet the entire homeless need in most, if not all, communities. This makes "diversion" a particularly valuable component of any viable Coordinated Entry System and is an area that will be developed more fully over the next five years.

A somewhat parallel service delivery system, called Unified Referral, was put into place in October 2017 through a collaboration between the Department of Behavioral Health and Developmental Disabilities (DBHDD) and DCA. Other partners also provided input during the development of the system including the Department of Veteran Affairs (VA), nonprofit representatives, the Department of Community Supervision (DCS), the Balance of State and City of Atlanta Continua of Care, and Community Service Boards.

Unified Referral is a web-based system whereby DBHDD providers can make direct referrals to DCA for its various housing programs. This referral system is designed specifically to refer those persons that are classified as having Severe and Persistent Mental Illness (SPMI) and who fall under the Department of Justice Settlement Agreement with DBHDD. Providers begin in the system with a *Need for Supportive Housing Survey* which determines if the DBHDD participant is Settlement eligible. If a DBHDD participant is determined to be Settlement eligible, access to the Unified Referral system becomes available and the participant states their housing situation and preferences. This includes their current and past housing situations, the county in which they wish to reside, and additional information such as homeless status, if they are a Veteran, would like information on HIV/AIDS housing, and/or if they have a criminal background. This information helps DCA determine viable housing recommendations through the Office of Homeless and Special Needs Housing.

Once DCA receives a referral through the Unified Referral system, all federally funded housing options are explored first. This includes ESG, HOPWA, Supportive Services for Veteran Families (SSVF), Shelter Plus

Care, and Continuum of Care housing programs. If none of those options are appropriate or viable, a referral is made to the Housing Choice Voucher (HCV) program. DCA has created a preference voucher for Settlement eligible individuals and there is a special, expedited process whereby a HCV can be issued. If for some reason a person referred through the system cannot obtain a HCV, they are referred to the state-funded Georgia Housing Voucher Program (GHVP). The Settlement Agreement stipulates that the GHVP should be the last housing resort for persons who are unable take advantage of any federally funded housing programs.

With regards to the HOPWA program, there is a strong relationship with the Department of Public Health (DPH), in particular with Ryan White clinics and local Boards of Health. DCA actually funds several local Boards of Health, which are also Ryan White clinics, through the HOPWA program. All of DCA's HOPWA projects collaborate closely with their local Ryan White clinics to access case management, health care, and short-term emergency housing. In turn, DPH providers and Ryan White clinics make referrals to the HOPWA program for medium and long-term housing assistance. One gap in the service delivery system is that DCA's HOPWA program currently only funds projects that cover 114 of the 126 counties that fall under the Balance of State HOPWA jurisdiction. It is a goal over the next five years to have full coverage in the state and to more closely align HOPWA service regions with the DPH health districts.

Availability of services targeted to homeless persons and persons with HIV and mainstream services

Table 56- Homeless Services Summary

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
Homelessness Prevention Services			
Counseling/Advocacy	X	X	X
Legal Assistance	X	X	X
Mortgage Assistance	X		X
Rental Assistance	X	X	X
Utilities Assistance	X	X	X
Street Outreach Services			
Law Enforcement	X		
Mobile Clinics	X	X	X
Other Street Outreach Services	X	X	X
Supportive Services			
Alcohol & Drug Abuse	X	X	X
Child Care	X	X	X
Education	X	X	X
Employment and Employment Training	X	X	X
Healthcare	X	X	X
HIV/AIDS	X	X	X
Life Skills	X	X	X
Mental Health Counseling	X	X	X
Transportation	X	X	X

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Describe the extent to which services targeted to homeless person and persons with HIV and mainstream services, such as health, mental health and employment services are made available to and used by homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families and unaccompanied youth) and persons with HIV within the jurisdiction

DCA administers all programs funded through the State Housing Trust Fund for the Homeless (HTF) Commission. Through Georgia's HOPWA Program, the state's nine HOPWA funded project sponsors are able to provide supportive services to persons living with HIV/AIDS from 114 of the State's 126-county HOPWA entitlement area. This represents an increase of six additional counties over the last five years. HOPWA project sponsors provide, or link clients to, services in the areas of alcohol and drug abuse, child care, education (for HIV/AIDS prevention), employment and training, health care, mental health services, legal aid, life skills, and transportation.

Many supportive service programs exist for persons who are homeless, however stand-alone service programs specifically targeted to persons who are homeless are principally based in the more urban areas of Georgia. There are employment training programs for persons who are homeless are in Athens, Atlanta, Decatur, Savannah, Marietta, Macon, and the seven rural counties surrounding Macon. Day centers are located in Athens, Atlanta, Columbus, Macon, Tifton, and Valdosta, and programs offering case management, ID assistance, mainstream resources assistance, healthcare, employment referrals, assessment, and transportation are located in Atlanta, Augusta, Marietta, Columbus, Macon, and Savannah.

Support services, outside of mainstream services, are provided for persons who are homeless through DCA's ESG funded emergency shelter, rapid re-housing, homeless prevention and street outreach programs. Funds are awarded through a competition with priority given to projects located in the State's consolidated planning area, the Georgia non-entitlement ESG area, and the Balance of State CoC.

The Georgia Department of Behavioral Health and Developmental Disabilities (DBHHD) is the state agency responsible for service provision, program oversight, and policy development of all behavioral health, substance abuse, and developmental/intellectual disability services. DBHDD coordinates its services through six regional offices, and through Community Service Boards (CSB). DBHDD provides community based public disability services for disabilities related to mental health, developmental disabilities, and addictive diseases. DCA has an extensive partnership with the CSBs and other DBHDD providers throughout Georgia, and provides funding to many of them through ESG, Shelter Plus Care, and Continuum of Care. As of January 2018, DCA is administering 73 permanent supportive housing project grants that are managed by 35 organizations, including CSBs and other nonprofits. These projects have 1,852 units in production as of January 2018.

Community based street outreach programs include DBHDD's PATH Teams that specifically target persons who are chronically homeless and have a mental illness in Atlanta, Columbus, Augusta, and Savannah. DBHDD also sponsors a toll-free Georgia Crisis and Access Line (1-800-715-4225) as well as Mobile Crisis Services that can also be reached through the toll-free number.

In an effort to end homelessness for veterans, DCA's Rental Assistance Division works with HUD and the U.S. Department of Veterans Affairs (VA) to administer VASH vouchers in Georgia. The HUD-Veterans Affairs Supportive Housing (HUD-VASH) program is a combination of Housing Choice Voucher (HCV) rental assistance for homeless veterans with case management and clinical services provided by the VA.

Homeless prevention programs and services outside of DCA's ESG funded programs that are located throughout Georgia are as follows: Georgia Legal Services, with 11 regional offices, offers legal assistance and advocacy in cases of eviction and foreclosure; temporary mortgage assistance for eligible households is provided through the HomeSafe Georgia program; Housing Choice Vouchers; Georgia Housing Vouchers; Section 811 Project Rental Assistance; CoC Permanent Supportive Housing; Supportive Services for Veteran Families; State Housing Trust Fund; Rehousing Partnership Housing Community Action Agencies administer utility assistance programs throughout the state; and there are many housing counseling agencies.

Describe the strengths and gaps of the service delivery system for special needs population and persons experiencing homelessness, including, but not limited to, the services listed above

The service delivery system for special needs populations and persons experiencing homelessness, including, but not limited to, the services listed above, is both diverse and strong in Georgia. The General Assembly affirmed its commitment to addressing the problem of homelessness in Georgia through the creation of the State Housing Trust Fund for the Homeless. The consolidation of the majority of the state's housing programs under one agency, DCA, has enabled the state to better coordinate the implementation of programs targeted to persons with special needs and/or persons experiencing homelessness, and has enhanced the resources available to address these needs. DCA has formed strong partnerships with other State agencies, local governments, and various nonprofit organizations to assist in not only addressing the issue of homelessness in Georgia, but in working to reduce the number of persons who are experiencing homelessness, prioritizing persons who are chronically homeless and veterans.

DBHDD contracts with CSBs, Boards of Health, nonprofit agencies, and state-operated regional hospitals to provide treatment and supportive services to persons with mental illnesses and addictive diseases, and support to people with developmental disabilities. Services at CSBs are available for all Georgians with low-income, however many CSBs target persons who are homeless with disabilities related to addictive diseases or mental illness through the administration of Shelter Plus Care programs. DBHDD also partners with DCA on the aforementioned Unified Referral system to rapidly house individuals diagnosed with SPMI, many of whom are homeless. For a list of DBHDD's Regional Offices, please go to: http://dbhdd.georgia.gov/regions.

The HIV Unit within the Georgia Department of Public Health works to provide programs targeted to persons living with HIV/AIDS that include the HIV Prevention Program, in all 18 health districts, and the HIV Care Program (Ryan White Part B) in 16 health districts. In addition to prevention services, testing, and reporting, these programs both provide essential medical and supportive services for persons with HIV diseases or AIDS and manage the Georgia AIDS Drug Assistance Program (ADAP) and Health Insurance

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Continuation Program (HICP). For a list of the Department of Public Health's statewide HIV care and service providers, please go to: http://www.health.state.ga.us/programs/stdhiv/providers.asp.

While many strengths exist in Georgia's system for delivering services to special needs populations and persons experiencing homelessness, gaps in this structure exist which hinders fully addressing this need. These gaps are summarized as: Local governments and nonprofit organizations often lack the capacity to administer housing programs, and many homeless service providers are hesitant to both serve clients with higher needs and move program strategies to a housing first model; Many of the more rural areas of Georgia lack nonprofit providers needed to ensure adequate coverage of the state; Program providers frequently have different funding cycles and/or program timelines that increase the difficulty in accessing the resources of various programs simultaneously; and Local governments may be unwilling or unfamiliar with the need to address affordable housing, homelessness, and special needs issues.

Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs

- In tandem with the Balance of State Continuum of Care, DCA is currently incorporating elements of the Federal Strategic Plan through the use of state funds to support projects that implement programs serving persons who are chronically homeless. The Coordinated Entry system is the mechanism whereby this implementation will take effect.
- DCA is currently expanding its Harm Reduction program for statewide implementation, and emphasizing a Housing First philosophy, to ensure persons who are chronically homeless have the widest range of interventions available to them.
- DCA continues to work with providers to build on the successful implementation of their rapid re-housing and homeless prevention projects for households with children throughout the state. DCA continues to prioritize homeless prevention and rapid re-housing projects through the ESG program and funds them at a significant level. In addition, all DCA funded agencies are required to set goals targeted toward ending homelessness as quickly as possible and connecting families with mainstream services. DCA will continue to provide focused training and technical assistance to shelter and housing providers on the Housing First model.
- Acting as the collaborative applicant for the Balance of State Continuum of Care, DCA works to enhance the institutional structure and engage more stakeholders in order to end homelessness for families, unaccompanied youth, veterans, and chronically homeless throughout Georgia.
- DCA will continue to strengthen connections with regional providers, such as Community Action Agencies, with the goal of all counties within the Balance of State CoC having access to homeless services through Coordinated Entry.
- Through the implementation of a Coordinated Entry System, DCA will be able to assess all persons who are homeless upon entry into the homeless response system. This data will be used to identify systemic barriers that can be addressed through the strategic system planning.

- DCA will also further data analysis begun in tracking the length of stay and in reoccurrence studies in order to assess systematic and programmatic barriers to families moving out of homelessness and link performance to funding and the rating of projects (where appropriate). The HUD mandated tracking of System Performance Measures will provide a guide for this analysis.
- DCA uses all available data to target specific ESG services to areas with demonstrated need for those services. To date, this has included the targeting of street outreach services to rural counties showing higher levels of unsheltered homelessness in the Point in Time count. Future targeted efforts could to include rapid re-housing and prevention. To the extent possible, these efforts may be incentivized by a reduced match requirement for sub-grantee agencies performing the services.

SP-45 Goals Summary – 91.315(a)(4)

Table 57 – Goals Summary

Objective	Category	Program	Funding	Goal Outcome Indicator	Predicted Outcome
Construction and rehabilitation of rental units	Affordable housing	HOME	79,600,000	Rental units constructed/rehabilitated	HOME: 1990; NHTF: 150
		NHTF	22,139,750		
Homeownership assistance	Affordable housing	HOME	6,250,000	Homeowner Housing Added	63
		HOME	18,750,000	Homeowner Housing Rehabilitated	375
		CDBG	9,500,000		100
Tenant-Based Rental Assistance	Affordable housing	HOME	0	Tenant-based rental assistance/rapid rehousing	0
Emergency shelter & transitional housing	Homeless	ESG	8,945,500	Homeless Person Overnight Shelter	35,200
Rapid re-housing assistance	Homeless	ESG	8,857,000	Tenant-based rental assistance/rapid rehousing	12,500
Homeless outreach assistance	Homeless	ESG	2,753,500	Other	2,150
Homeless prevention assistance	Non-Homeless Special Needs	ESG	2,810,250	Homelessness Prevention	4,200
HOPWA Tenant-Based Rental Assistance	Non-Homeless Special Needs	HOPWA	4,687,000	Tenant-based rental assistance/rapid rehousing	1,000
HOPWA Housing Assistance	Non-Homeless Special Needs	HOPWA	9,217,165	HIV/AIDS Housing Operations	1,000
Buildings	Non-housing Community Development	CDBG	20,000,000	Public facility or infrastructure activities other than low/moderate income housing benefit	10,000
Infrastructure	Non-housing Community Development	CDBG	109,250,000	Public facility or infrastructure activities other than low/moderate income housing benefit	40,000
Economic Incentive Program	Non-housing Community Development	CDBG	40,000,000	Jobs created/retained	2,000
Immediate Threat & Danger Program	Non-housing Community Development	CDBG	2,500,000	Jobs created/retained	5,000
Redevelopment	Non-housing Community Development	CDBG	7,500,000	Jobs created/retained	75

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Table 58 – Goal Descriptions

1	**Goal Name**	Construction/Rehabilitation of Rental Units
	Goal Description	This activity involves the new construction or rehabilitation of units for rent to income-eligible households. The allocation figure noted for this activity is an amount not to be exceeded.
2	**Goal Name**	Homeownership Assistance
	Goal Description	This activity includes the construction of new homeownership units, rehabilitation of owner-occupied units, and down payment assistance to income-eligible homebuyers. The funding allocation for HOME is a maximum amount that is not to be exceeded. The CDBG funding amount and persons to be assisted are based upon past performance as allocations for this activity will be based upon an annual competition for which there is no way to determine the amount of funds to be requested.
3	**Goal Name**	CHDO Pre-development Loans
	Goal Description	These funds will be used to provide loans to CHDOs with potential housing projects to determine if the project is viable.
4	**Goal Name**	CHDO Operating Assistance
	Goal Description	These funds will be provided to qualified CHDOs to assist them in building capacity.
5	**Goal Name**	Tenant-based Rental Assistance
	Goal Description	Funds will be used to provide assistance with rent, security deposits, and utilities for households with disabled individuals that qualify for the program. The funding allocation noted for this program is a maximum amount not to be exceeded.
6	**Goal Name**	Buildings
	Goal Description	Funds will be used by non-entitlement local governments to construct public facilities through an annual competitive application process. Because there is no way to predict how many applications for this activity will be received or funded, the amount and goal outcome indicator listed below is an estimate based upon percentages in years past.
7	**Goal Name**	Infrastructure
	Goal Description	Funds will be provided to non-entitlement local governments through an annual competition to carry out infrastructure projects including but not limited to water and sewer lines, drainage, sidewalks, and road improvements. The funding and number of persons assisted are estimates based upon past performance as there is no way to determine how many projects will be submitted or awarded as part of this annual competition.

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8	**Goal Name**	Immediate Threat and Danger Program
	Goal Description	These funds are made available to local governments that have an urgent need that may adversely affect the health or welfare of their citizens for which other financial resources are unavailable. The funding and number of persons assisted are estimates based upon past performance as there is no way to determine how many projects will be submitted or awarded.
9	**Goal Name**	Economic Development
	Goal Description	Funds are provided to local governments, nonprofits, and for-profit organizations to carry out activities that result in job creation or retention primarily for low and moderate-income persons. The funding and number of persons assisted are estimates based upon past performance as there is no way to determine how many projects will be submitted or awarded.
10	**Goal Name**	Redevelopment
	Goal Description	Funds are made available to local governments to assist with the implementation of economic and community development projects that result in job creation or retention or the elimination of slums and blight. The funding and number of persons assisted are estimates based upon past performance as there is no way to determine how many projects will be submitted or awarded.
11	**Goal Name**	Emergency Shelter & Transitional Housing
	Goal Description	Provision of essential services to homeless families and individuals in emergency shelters/transitional housing programs, operating emergency shelters and issuing hotel/motel vouchers, and operating transitional housing programs. (Under emergency shelter Hotel/Motel Vouchers are to be used in the absence of adequate or appropriate shelter based upon documented needs in areas where rapid re-housing or outreach programs exist.) Eligible costs noted in application guidelines for each type of housing assistance.
12	**Goal Name**	Rapid Re-housing Assistance
	Goal Description	Provision of short-term or medium-term payments for rents or utilities. Assistance may be tenant or project-based. Beneficiaries may include homeless individuals or families (rapid re-housing), or individuals or families at risk of homelessness (homelessness prevention). Regional implementations are preferred for this activity.
13	**Goal Name**	Homeless Prevention Assistance
	Goal Description	Provision of services associated with rental assistance, to include housing search, mediation or outreach to landlords, legal services, credit repair, providing security or utility deposits, utility payments, rental assistance for a final month at a location, assistance with moving costs, or other activities (including hotel/motel vouchers) that are effective at: (a) stabilizing individuals and families in their current housing (homelessness prevention); or (b) (quickly moving such individuals and families to other permanent housing (rapid re-housing).

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14	**Goal Name**	Homeless Outreach Assistance
	Goal Description	Provision of essential services necessary to reach out to unsheltered homeless people; connect them with emergency shelter, housing, or critical services; and provide urgent, non-facility-based care to unsheltered homeless people who are unwilling or unable to access emergency shelter, housing, or an appropriate health facility. For the purposes of this section, the term ''unsheltered homeless people'' means individuals and families who qualify as homeless under paragraph (1)(i) of the ''homeless'' definition under § 576.2. The eligible costs and requirements for essential services consist of: Engagement; Case management; Emergency health services; Emergency mental health services; and Transportation.
15	**Goal Name**	HOPWA Tenant-based Rental Assistance
	Goal Description	Provision of time-limited assistance designed to prevent homelessness and to help low-income people with HIV and AIDS to live independently.
16	**Goal Name**	HOPWA Housing Assistance
	Goal Description	Provision of eligible housing activities as named in current HUD regulations (24 CFR 574.300) that include but are not limited to the following: Facility-based Housing, Short-term Supportive Housing/Temporary Shelter, Permanent Housing Placement, Rental Assistance (including Shared Housing), Homelessness Prevention.

Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2)

Extremely Low-income Households Expected to be assisted with Housing: TOTAL - 856
(CDBG: 12, HOME: 694, NHTF: 150)
Low-income Households Expected to be assisted with Housing: TOTAL – 1,912
(CDBG: 33, HOME-1,879)
Moderate-income Households Expected to be assisted with Housing: TOTAL - 2,383
(CDBG: 18, HOME-2,365)

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SP-50 Public Housing Accessibility and Involvement – 91.315(c)

Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary Compliance Agreement)

The State of Georgia does not own, manage, or operate any public housing units.

Activities to Increase Resident Involvements

N/A

Is the public housing agency designated as troubled under 24 CFR part 902?

N/A

Plan to remove the 'troubled' designation

N/A

SP-55 Barriers to affordable housing – 91.315(h)

Barriers to Affordable Housing

Due to an increase in the number of renters in recent years, the demand for rental units has elevated and subsequently rents have risen, lowering the number of affordable rental units for low-income households. Additionally, home prices have risen significantly making homeownership unaffordable for many Georgians, further increasing the demand for rental housing.

Public policy related to the cost of housing and the incentives to develop, maintain, or improve affordable housing varies widely through Georgia and is shaped by a complex intersection of local, regional, and national pressures, as explored in MA-40 Barriers to Affordable Housing.

Strategy to Remove or Ameliorate the Barriers to Affordable Housing

Effective in 2014, the State amended its Minimum Standards and Procedures for Local Comprehensive Planning. The Minimum Standards and Procedures provide a framework for the development, management and implementation of local comprehensive plans, encouraging local governments throughout the State to examine all of their policies, including those related to housing, to see if they result in any negative effects.

Each CDBG Entitlement Community is required to include within its local Comprehensive Plan a Housing Element, while all other local governments are encouraged to include such an element. Updates to the Housing Element in subsequent updates of the local comprehensive plan are completed at local discretion to address shifting priorities or evolving conditions. Factors are identified to evaluate the adequacy and suitability of existing housing stock to serve current and future community needs: housing types and mix, condition and occupancy, local cost of housing, cost-burdened households in the community, jobs-housing balance, housing needs of special populations, and availability of housing options across the life cycle. All local governments must also implement a five-year Community Work Program: a series of specific, actionable projects and activities addressing any needs or opportunities identified in other elements of the local comprehensive plan.

For those communities throughout the State that want additional housing information and technical assistance to mitigate any existing barriers or identify affordable housing incentives, the Georgia Initiative for Community Housing (GICH) was created. Since its start in 2004, 62 communities have participated in or are currently in the GICH program. GICH offers communities a three-year program of collaboration and technical assistance. The objective of the Initiative is to help communities create and launch a locally based plan to meet their housing and neighborhood revitalization needs, as well as to allow them to look at potential barriers to affordable housing that may exist in their communities.

During the three-year program of technical assistance and cross-community sharing, GICH teams:

- Attend two retreats a year with other participating communities
- Identify issues and needs, available resources, and potential obstacles

- Develop new ideas about meeting local housing needs and enhancing community development
- Learn about best practices and available resources for housing and community development
- Produce and begin implementation of a community housing plan with objectives and goals

The program represents a collaboration of partners: the Georgia Department of Community Affairs (DCA), the Georgia Municipal Association (GMA), the University of Georgia (UGA) Housing and Demographics Research Center, and the UGA Office of the Vice President for Public Service and Outreach. The Georgia Power Company is GICH's Founding Sponsor. Additional in-kind support is provided by Georgia EMC, the UGA Archway Partnership, and the UGA Carl Vinson Institute of Government.

DCA also continues to leverage the Federal and State Low-Income Housing Tax Credit with HOME funds and NHTF funds to increase the stock of affordable rental housing and incentivize 4% bond transactions.

SP-60 Homelessness Strategy – 91.315(d)

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

- Expand DCA's harm reduction program for statewide implementation to ensure persons who are chronically homeless have the widest range of interventions available to them;
- Continue to provide technical assistance for street outreach programs to establish policy and procedure as outreach programs begin work.

Addressing the emergency and transitional housing needs of homeless persons

- Provide housing necessary for Georgia's homeless to break the cycle of homelessness to provide housing to an estimated 41,550 homeless individuals over five years through implementation of Georgia's ESG Program including emergency shelter, homeless prevention and street outreach;
- Provide decent affordable housing to an estimated 12,500 persons over five years who would otherwise be living on the street or in shelters/transitional housing programs through implementation of the Rapid Re-Housing Program funded through Georgia's ESG Program;
- Continue to work with providers to increase the accessibility to the Rapid Re-Housing program throughout the State.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again.

- Continue to educate DCA sub-grantees in the Housing First model and encourage them to prioritize Rapid Re-Housing funds towards ending homelessness;
- Provide technical assistance in the implementation of Outreach and Rapid Re-Housing grants towards increasing the number of homeless households served;
- Target Prevention dollars to communities that are able to demonstrate most need;
- Through the use of HMIS data, continue to monitor the length of time households are homeless, and then establish targets for agencies to assist households into permanent housing;
- Promote research into recidivism, and promote further research to assist agencies at a program level towards reducing the level of recidivism;
- Continue DCA's long-term commitment to Permanent Supportive housing.

Help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving

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assistance from public and private agencies that address housing, health, social services, employment, education or youth needs

Currently all grantees of State ESG funds are required to follow the HUD eligibility guidelines regarding individuals and families being discharged from institutions to receive homeless services.

SP-65 Lead-Based Paint Hazards – 91.315(i)

Actions to address LBP hazards and increase access to housing without LBP hazards

Any homes built prior to 1978 are evaluated for the presence of lead-based paint and lead-based paint hazards. The State is committed to ensure that recipients of HOME, CDBG, and ESG funds administer programs that adequately limit the risks associated with lead-based paint. If funded, applicants receive additional information on dealing with lead-based paint hazards and ongoing technical assistance throughout the project to reduce or eliminate the risk associated with lead-based paint hazards. Both the CDBG and HOME programs allow funds to be used to assist with the cost of lead-based paint evaluation and hazard mitigation activities, depending upon the type of activity being funded, in accordance with 24CFR Part 35.

The State requires testing for the presence of lead-based paint in all housing proposed for rehabilitation that is built prior to 1978. Contractors working on these homes must be lead-certified and follow safe work practices in working on any of the affected areas to protect their workers. The State Department of Natural Resources provides education, training, and certification to contractors in the treatment of lead-based paint. The State provides to the owners and occupants a lead pamphlet, Protect Your Family from Lead in Your Home, before starting renovation work and maintains documentation that it was received by the residents. For work in common areas of multi-family housing, the State distributes renovation notices to tenants. The State retains all the records for three years after renovation is completed.

How are the actions listed above integrated into housing policies and procedures?

All Program Policies and procedures are required to incorporate provisions for the evaluation of Lead-based Paint hazards for housing units built before 1978 in accordance with 24 CFR Part 35 Subpart J. If Lead-based paint hazards are found, risk assessments will be completed and all lead-related work will be performed by contractors certified to perform interim control and/or abatement work. Clearance tests will be completed to ensure that the hazard has been mitigated. All those affected by these programs will receive information to educate them about the dangers of lead paint in accordance with information disclosures required under 24 CFR Part 35.

The Department of Human Services administers other lead poisoning prevention programs, including a statewide lead poisoning surveillance system that incorporates electronic reporting of all blood lead levels, and health education awareness programs.

SP-70 Anti-Poverty Strategy – 91.315(j)

Jurisdiction Goals, Programs and Policies for reducing the number of Poverty-Level Families

According to U.S. Census data, Georgia had a total of 1,694,988 residents living below the poverty line in 2016. This constituted 17.1% of the state's population. This number decreased to 1,603,013 in 2017. This figure represented 16.0% of all Georgia residents. Based upon the 2017 Census statistics, Georgia is ranked 41st of all 50 states in the percentage of its citizens living in poverty.

In 2016, Georgia's unemployment rate was 5.4% and only 9 states had a higher rate. While this was still high, the numbers are trending downward. The rate for Georgia in 2015 was 5.9%. The unemployment rate in January 2010 was 10.4% which represents an all-time high for the state. Job creation and retention combined with job training opportunities are considered to be the best way to fight poverty and to provide Georgians throughout the state the ability to live self-sufficiently. Following are several initiatives the State is undertaking in this area:

- The Technical College System of Georgia (formerly Georgia Department of Technical and Adult Education - DTAE) offers easy access to a number of programs including technical education, customized business and industry training, and adult education classes.
- The University of Georgia's Fanning Institute and Georgia Municipal Association host the annual Professional Development Day program that gives certification-training credits for participating in career-related training after passing a written examination.
- The Georgia Appalachian Center for Higher Education (GACHE) Advisory Board awards competitive grants to high schools located in Georgia's Appalachian Regional Commission-designated counties. The grants will provide schools with resources to enable them to continue to increase their graduation and college-going rates.
- The Small Business Jobs Act of 2010 created the State Small Business Credit Initiative, funded with $1.5 billion nationwide to strengthen state lending programs that support small businesses and manufacturers. Of that total amount allocated, Georgia was allocated $48,024,748 in 2011. Though this was a one-time allocation, these funds still are used to provide low-cost capital to small businesses for expansion and improvements.
- The High Demand Career Initiative (HDCI) was created in response to the need for a consistent, trained and reliable workforce. This program allows state partners involved in training Georgia's future workforce-primarily the University System of Georgia and the Technical College System of Georgia- to hear directly from the private sector about what specific needs they have from a workforce perspective (i.e., degrees/majors, certificates, courses, skillsets, etc.). With decision makers from each of these entities at one table, a clear picture is painted of what Georgia businesses need from a workforce and pair tem with existing assets and/or collectively tackle any gaps, one by one.
- There are 20 Workforce Investment Act service areas in Georgia, and each workforce area has at least one comprehensive/full-service One-Stop Workforce Center where a wide range of workforce services are available to job seekers and employers. There are currently 46 full-service Career Centers in Georgia.

How are the Jurisdiction poverty reducing goals, programs, and policies coordinated with this affordable housing plan?

Georgia recognizes that affordable housing is a key component in poverty-reduction strategies. The Qualified Allocation Plan (QAP) is the document that the State develops to govern the allocation of Low-Income Housing Tax Credits (LIHTC), which can be combined with HOME Program funds. The QAP prioritizes developments that are sited in stable communities—areas of lower poverty and access to place-based opportunity like transportation, education, and high workforce housing need—and those that are in revitalizing communities—areas that have higher poverty rates but are paired with a concerted community revitalization plan.

In addition to the HOME Rental Housing Loan Program, incentives are also included in scoring for the Community HOME Investment Program (CHIP) to serve lower income households. This competitive program allows local governments, nonprofit organizations, and public housing authorities to apply for funds through the provision of owner-occupied housing rehabilitation and the construction or reconstruction of single-family homes for sale to eligible homebuyers. Points are provided to applicants based upon the percentage of persons below the poverty line in the proposed area of service with higher numbers getting higher points.

The National Housing Trust Fund program is intended to increase and preserve affordable housing for extremely low- income (ELI) households, including homeless families. The NHTF allocation will be used to create housing affordable to the extremely low-income (ELI) households with incomes at or below 30% of Area Median Income (AMI). This competitive process allows for for-profit entities, eligible nonprofit entities 501(C) (3) and 501(C) (4), and public entities (such as Public Housing Authorities) that will undertake the eligible activities on behalf of the ELI households. Funds will be awarded to qualified Applicants who have met all Threshold Requirements and receives the highest scores for the submitted Application. Applications that do not meet the requirements of the distribution of funds will not be scored under the Threshold Requirements.

For CDBG, the Method of Distribution for the Annual Competition and the set-asides use demographic scores to increase the chances of funding for those jurisdictions in the state that suffer from higher levels of poverty. The factors used include the number and percent of poverty as well as per capita income. Each competition compares communities on their relative level of poverty compared to other applicants using the most recent data available. Although other competitive factors on a combined basis carry more weight (e.g., target area benefit, health and safety needs, project feasibility), these points assist communities with public infrastructure, buildings and preservation of the affordable housing stock when, other factors being equal, their level of poverty is greater than others.

SP-80 Monitoring – 91.330

Describe the standards and procedures that the state will use to monitor activities carried out in furtherance of the plan and will use to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements

HOME & NHTF

DCA has established standards and procedures for monitoring federally funded housing and community development activities. These standards and procedures ensure long-term compliance with the applicable regulations and statutes. These include compliance reviews of applications, monitoring during project implementation and formal procedures for closing projects. DCA reserves the right to conduct a compliance review at any time during the term of the grant.

DCA conducts homeownership and home buyer monitoring prior to the loan closing, during construction/rehabilitation, and throughout the period of affordability for all the State programs. During the planning stage and construction phase, DCA reviews the projects to ensure the applicant meets all the applicable accessibility requirements. During the pre-construction conference, the owner will receive a complete package of HOME compliance materials and information on training opportunities.

Rental Housing Monitoring

All HOME and NHTF rental developments receive on-site management review and physical inspection on an ongoing basis. Written reports are compiled and distributed that summarized the four major areas of the monitoring visit: quality of housing and service, financial statements, recordkeeping and files, adherence to program policies and procedures as detailed in 24 CFR Part 92.

To facilitate this monitoring process for the state's HOME-financed rental housing programs, the State sponsors a compliance training seminar for HOME program participants, including such topics as: tenant applications, income limits, rent limits/utility allowance, income verifications, annual income and assets, income certifications/re-certifications, leases, occupancy status reports, annual reports, and the responsibilities of property owners.

The property owners are required to complete the Georgia HOME Annual Owner Certification each year validating the subject property meets compliance with all appropriate federal and state regulations. The owner submits a copy of the certificate to DCA prior to the beginning of lease-up or placing the first building in service. This certification process continues throughout the life of the period of affordability, compliance period or the term of the loan, whichever is longest. All NHTF-assisted units are subject to a 30-year affordability period, which begins at project completion. Rent and income requirements must be maintained during the entire period of affordability.

In the past, DCA has conducted site visits annually for multifamily properties with 26 or more units and biannually for multifamily properties with 25 or fewer units. Under HUD's proposed HOME rule, the required standard is going to change. On-site inspections must be carried out within 12 months after completion and at least once every three years thereafter. In addition, the proposed HOME rule would require DCA to review the financial condition of each HOME rental project at least annually to determine

the continued financial viability of the project and take corrective actions if needed. DCA will evaluate each property and determine, based upon their past performance and current financial reviews, the appropriate schedule for on-site visits. HUD's minimum requirements under the proposed rule will be met for all properties but, for those determined to be higher risks, more frequent on-site reviews will take place. For conformance, the State will begin inspecting the properties using HUD's minimum Uniform Physical Condition Standards (UPCS) as required in the proposed rule instead of the Housing Quality Standards that were used previously. DCA will continue to monitor each property for compliance with its executed land use restriction agreement. For all projects where funds are committed after the effective date of the final HOME rule, DCA will begin charging a reasonable monitoring fee to the owners of those projects during the period of affordability.

DCA will perform an onsite inspection of each NHTF assisted project at project completion to determine that the housing meets the property standards of 92.741 through 92.744. In the past, DCA has conducted site visits annually for multifamily properties with 26 or more units and biannually for multifamily properties with 25 or fewer units. Under HUD's proposed rule, the required standard is going to change. On-site inspections must be carried out within 12 months after completion and at least once every three years thereafter. In addition, the proposed HOME rule would require DCA to review the financial condition of each HOME rental project at least annually to determine the continued financial viability of the project and take corrective actions if needed. DCA will evaluate each property and determine, based upon their past performance and current financial reviews, the appropriate schedule for on-site visits. HUD's minimum requirements under the proposed rule will be met for all properties but, for those determined to be higher risks, more frequent on-site reviews will take place. For conformance, the State will begin inspecting the properties using HUD's minimum Uniform Physical Condition Standards (UPCS) as required in the proposed rule instead of the Housing Quality Standards that were used previously. DCA will continue to monitor each property for compliance with its executed land use restriction agreement. For all projects where funds are committed after the effective date of the final HOME rule, DCA will begin charging a reasonable monitoring fee to the owners of those projects during the period of affordability.

a) Subsidy Layering – DCA conducts a subsidy layering review prior to the time of commitment for projects receiving tax credits from the state's low-income housing tax credit allocation to determine the amount of assistance needed for the project. This review will include an examination of the proposed sources and uses for each project to determine whether the costs appear to be reasonable, an assessment of the market conditions in the community, the housing development experience and financial capacity of the applicant, and all firm financial commitments for the project. This review will also determine if the project is in accordance with DCA's guidelines for a reasonable level of profit or return based upon the owner's investment in the project.
b) Environmental Review – DCA requires a site-specific Phase I environmental assessment for all development proposals being considered for funding with HOME funds to address, asbestos, mold, lead-based paint, lead in drinking water, radon, PCBs, floodplains and wetlands. The Applicant, as outlined in the HOME/HUD Environmental Questionnaire, must complete additional requirements for HOME/HUD funded projects at the time of Application Submission, including, but not limited to, the Eight-Step process and HUD publication procedures.

c) Site and Neighborhood Standards – Each property proposed for new construction must meet the requirements of site and neighborhood standards during the threshold review of information submitted (project location, racial composition of project area, visual review of area surrounding the site) and a physical site visit to determine any conditions present, which may be seriously detrimental to family life.
d) Labor Standards - projects involving the construction of affordable housing consisting of 12 or more HOME units requires that the labor standards regulations be followed: Davis-Bacon, Contract Work Hours and Safety Standards, Copeland Anti-Kickback, and all other applicable regulations identified in the HUD Handbook #1344.1. This information is discussed during the pre-construction conference.
e) Section 3 – Section 3 of the Housing and Urban Development Act of 1968 requires that economic opportunities generated by HUD-funded programs including CDBG and HOME shall, to the greatest extent feasible, be given to low and very low-income persons and to businesses that provide economic opportunities for those persons. This information is discussed with contractors and subcontractors at pre-construction conferences if applicable and they are required to submit a plan showing how they propose to meet these requirements. Once approved, they are required to report all outreach actions they took to hire Section 3 residents and provided related data about those residents.
f) Affirmative Marketing – For developments with 5 or more units, the owners must adopt and conduct affirmative marketing procedures and requirements, provide information and otherwise attract eligible persons.
g) Uniform Relocation Act – Relocation requirements compliance is monitored during the construction and lease up phase of the project. Relocation plans and budgets are reviewed during the site visits. Voluntary acquisitions are also subject to the requirements outlined at 49 CFR 24.101, as outlined in HUD's implementing instructions found in Chapter 5 of Handbook 1378.
h) Fair Housing, Equal Opportunity and Accessibility Laws – All federal, state and local laws relating to fair housing and equal opportunity, including but not limited to those listed below must be followed
    a. Minority Business Enterprise
    b. Section 504 of the Rehabilitation
    c. Americans with Disabilities Act
i) Rent and Income – DCA assists owners/property staff with understanding the federal requirements and the correct procedures to handle essential requirements: rent restrictions, income limits, and physical requirements. On-site visits are conducted during the leasing phase and files are reviewed during the visit. HOME properties are visited annually during the period of affordability. All NHTF assisted units must be affordable to extremely low-income (ELI) renter households. For tenants who are ELI, their rent plus an allowance for tenant-paid utilities must not exceed the greater of 30 percent of the federal poverty line or 30 percent of the income of a family whose annual income equals 30 percent of AMI for the area, as determined by HUD, with adjustments for the number of bedrooms in the unit. If a NHTF-assisted unit receives Federal or State project based rental assistance, and the tenant pays a contribution toward rent not more

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than 30 percent of the tenants' adjusted income, the maximum rent is the rent allowable under the Federal and State project based rental subsidy.

Monitoring of Grants to Fund Construction and Rehabilitation of Owner-Occupied Homes

DCA awards HOME funds to rehabilitate owner-occupied homes and build and renovate affordable single-family homes to eligible homebuyers through the Community HOME Investment Program (CHIP). State Recipients and sub-recipients must constantly monitor their own performance to insure timeframes are being met and to control the quality of the product being delivered. Any problems, delays, or adverse conditions that will affect the state recipient's ability to meet its stated goals should be reported to DCA immediately.

The majority of information required by DCA for its annual reporting requirements to HUD will be submitted at the activity level as projects are completed. However, the state recipient or sub-recipient must provide additional program reports or information to DCA on an "as needed basis."

Because of its program set up and draw requirements, DCA will continually monitor each State Recipient and Sub-recipient's progress in carrying out their program activities. DCA will issue a notice to any State Recipient or Sub-recipient that is significantly behind on the program's implementation schedule described in the program description.

As a part of DCA's pre-set up process, recipients must submit verification of income, property ownership, owner occupancy, property type and value, property standards, loan and grant documentation, construction documentation, and source documentation for all invoices and other financial management review.

In addition, DCA monitors the following federal requirements:

a) Subsidy Layering – DCA conducts a subsidy layering review at the time of project set-up. Prior to approving the setup of a project, proposed source of funding is examined and cost reasonableness is determined.
b) Environmental Review – DCA requires each State Recipient and Sub-recipient to submit a site specific environmental assessment for all proposed project sites prior to approving a set up. The level of review required is predicated upon the type of activity proposed. The pre-set up process allows DCA to monitor the clearance of environmental concerns prior to the commitment of HOME funds for that activity.
c) Lead-Based Paint – all homes constructed prior to 1978 must be tested for lead paint. Qualified contractors working on these homes must be Lead-Based Paint certified.
d) Uniform Relocation Act – Compliance with acquisition and relocation requirements is monitored during the pre-set up phase of the project. Owner-occupied rehabilitation is not eligible for relocation assistance under CHIP; however, if the level of work requires the family to temporarily vacate their residence, the state recipient or sub-recipient is responsible to cover relocation expenses. DCA monitors the recipient's process for relocating the affected families.
e) Other Federal Requirements – DCA requires state Recipients and sub-recipients to submit policies and procedures that document the recipient's process for compliance. Recipients are required to provide complete details of their contracting requirements, rehabilitation standards, Minority

Business Enterprise and Women Business Enterprise Outreach Plans, Affirmative Fair Housing Marketing Plans, Language Access Plans, and Section 3 Plans. These requirements must be cleared prior to DCA entering into an agreement to commit funds to the recipient.

After all project funds have been drawn, DCA conducts on-site Close-Out Review to monitor program and project records for compliance with HOME regulations including reconciliation of draw down records, outstanding monitoring issues, unused funds return, administrative draws, case file reviews, and record retention.

DCA staff will provide technical assistance during the program year at the request of state recipients and sub-recipients and/or their contracted administrators.

Periodically, DCA issues CHIP policy memoranda to all active state recipients and sub-recipients and administrators providing clarification of CHIP programmatic issues and/or to provide updates.

Minority and Women Business Outreach

DCA makes every effort to encourage recipients to solicit the participation of minority-and women owned businesses (MBE/WBEs) in contracting under the HOME program. Recipients should include qualified MBE/WBEs on solicitation lists and solicit their participation whenever they are potential sources.

Through project monitoring and reporting, DCA staff review each recipient's documentation of efforts and results in securing contracts with MBE/WBEs. DCA staff also provides recipients with information during the various state sponsored workshops.

ESG

In accordance with program regulations all of the State's ESG sub-grantees will have an on-site review of their homeless housing and/or service program. Program monitoring is an ongoing process of reviewing a grantee's performance in meeting goals, identifying program deficiencies, and enhancing management capacity through technical assistance or other corrective actions.

The Department of Community Affairs (DCA)/Housing Trust Fund (HTF) and/or its assigns, will review the performance of each ESG recipient in carrying out its responsibilities whenever determined necessary, but at least annually. Current DCA policy requires an initial on-site visit to each new grantee. In conducting performance reviews, DCA staff will obtain financial and programmatic information from the grantee's records and reports and, when appropriate, its sub-recipients, as well as information from onsite monitoring and electronic data sources. Where applicable, the DCA may also consider relevant information pertaining to the recipient's performance gained from other sources, including application for funding, reimbursement requests, audits and annual reports. Reviews to determine compliance with specific requirements of the ESG program will be conducted as necessary, with prior notice to the grantee.

If it is determined that the recipient, or one of its sub-recipients, has not complied with an ESG program requirement, DCA will give the ESG recipient grantee notice of this determination and an opportunity to demonstrate, within the time prescribed by the DCA and on the basis of substantial facts and data, that the grantee has complied with ESG requirements.

Remedial actions and sanctions for a failure to meet an ESG program requirement will be designed to prevent a continuation of the deficiency; mitigate, to the extent possible, its adverse effects or consequences; and prevent its recurrence. If the recipient fails to demonstrate to the DCA's satisfaction that the activities were carried out in compliance with ESG program requirements, the DCA will take one or more of the remedial actions or sanctions.

DCA has established the primary goal of reducing the number of unsheltered homeless individuals and families in the State ESG non-entitlement. The information contained below outlines goals, strategies and performance measures to be utilized for all ESG sub-recipients.

Overall Goals

1. Reduce the number of unsheltered individuals and families, as established in the Homeless Point in Time Count, within the BoS ESG non-entitlement by 1% each year. This goal will be achieved by placing emphasis on high utilization of emergency shelters and transitional housing beds. This will be measured in HMIS.
    a. Reduce length of stay for clients in emergency shelters and transitional housing programs in order to provide services to additional households. Length of stay should generally be no longer than 90 days for shelters and 1 year for Transitional Housing. This will be measured in HMIS.
    b. Increase placements into permanent housing for homeless individuals and families from Emergency Shelter and Transitional housing by 5% each year. This will be measured in HMIS.
2. Prevent individuals and families from becoming homeless – either unsheltered or sheltered, by 3% each year. Follow-up contacts will be made at 3 months and 6 months post discharge. This will be measured in HMIS.
3. Increase the percentage of individuals and families remaining in permanent housing for 3 months by 2% each year. This goal will be achieved by increasing income or access to mainstream benefits for program participants while in the ESG program. This will be measured in HMIS.

Performance Measurements

ESG programs with different eligible activities will require different assessment standards. A baseline for certain criteria, such as increase in cash and non- cash incomes over program enrollment, must first be established to measure performance. For categories with established baselines, standards are enumerated. DCA will review all available data annually to evaluate performance and adjust standards as appropriate.

*For each Emergency Shelter program, performance will be measured based on the following standards:

1. An overall bed utilization rate of 80%.
2. The average length of stay of the households served should be no longer than 60 days for those exiting to permanent destinations.
3. An increase in the percentage of discharged households that secure permanent housing at exit by 5% each year.

4. An increase in the percentage of households that increase cash and non-cash income during program enrollment.

For each Transitional Housing program, performance will be measured based on the following standards:

1. An overall bed utilization rate of 80%.
2. The average length of stay for households served should generally be no longer than nine months for those exiting to permanent housing.
3. An increase in the percentage of discharged households that secured permanent housing at exit by 5% each year.
4. An increase in the percentage of households that increase cash and non-cash income during program enrollment.

For each Rapid Re-Housing program, performance will be measured based on the following standards:

1. An increase in the percentage of discharged households that secured permanent housing at program exit by 2% each year.
2. An increase in the percentage of discharged households permanently housed three months after exit.
3. An increase in the percentage of households that increase cash and non-cash income during program enrollment.

For each Homeless Prevention program, performance will be measured based on the following standards:

1. An increase in the percentage of discharged households that maintained permanent housing at program exit by 3% each year.
2. An increase in the percentage of discharged households permanently housed three months after exit.
3. An increase in the percentage of households that increase cash and non-cash income during program enrollment.

For each Street Outreach program, performance will be measured based on the following standards:

1. An increase in the number of contacts with unduplicated individuals made during outreach.
2. An increase in the percentage of households that access emergency shelter or transitional housing.
3. An increase in the percentage of discharged households that access permanent housing.
4. An increase in the percentage of households that increase cash and non-cash income during program enrollment.

*Shelters serving the chronically homeless, or chemically dependent clients, or shelters with minimal barriers to entry may be held to different standards than other emergency shelters.

HOPWA

DCA monitors the Grantee's participation in the Program to ensure compliance with program regulations promulgated by HUD at 24 CFR, Part 574 for HOPWA programs designed to benefit persons with HIV related needs. Effective oversight and monitoring recipients is an important function of DCA.

Efforts connected with HOPWA continue to be strengthening existing programs through, in part, diversification of housing programs within sponsor agencies, and renewed and targeted monitoring efforts. Grantees receiving HOPWA funding, will receive an on-site monitoring visit each contract year. After each monitoring visit is complete, DCA will send each HOPWA Grantee correspondence documenting findings and/or concerns, project accomplishments, areas of deficiencies and technical assistance needs, which are highlighted in the report and serves to confirm issues discussed during the on-site monitoring review process and to give grantees notice of deficient areas requiring attention.

DCA relies upon thorough application review and reimbursement of funds expended in lieu of advancing funds. Desk audits are often performed at DCA to test compliance. On-site monitoring, therefore, is largely limited to eligibility of beneficiaries and a comparison of program records with the programmatic claims of the applicant.

Section 3 applies to HOPWA projects for which the aggregate amount of covered funding exceeds $200,000 and is used for activities involving housing construction, demolition, rehabilitation, or other public construction. In the event DCA provides funding to a subrecipient for one of these activities that qualifies, the recipient will be required to submit a Section 3 Plan showing how it plans to comply with the requirements and DCA staff will monitor their compliance with the Plan they submit as well as other requirements related to this issue

CDBG

To ensure that each recipient of CDBG funds operates in compliance with applicable federal laws and regulations, DCA conducts frequent on-site monitoring of every grant award. DCA follows a monitoring strategy that closely reviews government activities and provides extensive technical assistance to prevent compliance problems. All required compliance requirements are described in the CDBG Recipients' Manual.

Pre-funding site visits are made to each potential grant recipient. Once grants are awarded, DCA conducts an initial "start-up" visit to assess the capacity and needs of each recipient. In addition, all recipients attend a workshop for extensive training and are provided a program manual to use for implementing their projects and following federal compliance requirements. Recipients must constantly monitor performance to ensure that time schedules are being met, projected milestones are being accomplished, and other performance goals are being achieved in accordance with the approved application.

Each grant recipient is monitored several times each year by trained DCA staff. A monitoring report is completed for the following compliance areas:

- Environmental
- Eligibility
- Fair Housing

- Civil Rights and Equal Opportunity
- Financial and Audit
- Federal Labor Standards
- Acquisition and Relocation, Section 104(d)
- Interim and Final Audit
- Final Benefit Count
- Housing Rehabilitation Standards and Policies
- Lead-based Paint Regulations (24CFR Part 35)
- Citizen Participation
- Section 3

In the event that DCA staff identifies compliance problems, the Chief Elected Official is notified and a deadline is set for a response and possible corrective actions. DCA maintains a monitoring status system to insure timely resolution of findings. Prior to formal close-out of each grant, a final check is made to be sure all monitoring has been completed and any finding is resolved satisfactorily.

ANNUAL ACTION PLAN
Federal FY 2013 – State FY 2014
July 1, 2013 – June 30, 2014

Expected Resources

AP-15 Expected Resources – 91.320(c)(1,2)

Introduction

Georgia will have a number of federal, state, local, and private resources available to address the priority needs and objectives identified in this Strategic Plan. Included in these are the following:

- CDBG
- HOME
- ESG
- HOPWA
- NHTF
- Housing Choice Vouchers
- State and Federal Low-Income Housing Tax Credits
- Competitive HUD Homeless funds
- Shelter Plus Care
- State Housing Trust Fund for the Homeless
- HomeSafe Georgia
- Section 811 Project Rental Assistance
- HUD Housing Counseling
- National Foreclosure Mitigation Counseling (NFMC)

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Anticipated Resources

Table 59 - Expected Resources – Priority Table

Program	Source of Funds	Use of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of Con Plan	Narrative Description
			Annual Allocation	Program Income	Prior Year Resources	Total		
CDBG	Public-federal	Acquisition Administration and planning Economic development Housing Public improvements Public services	37,000,000	750,000	7,000,000	44,750,000	179,000,000	Required match plus additional leverage will be used with federal funds
HOME	Public-federal	Acquisition Homebuyer assistance Homeowner rehabilitations Multifamily rental new construction Multifamily rental rehabilitations New construction for ownership Tenant-based rental assistance	15,237,392	6,000,000	9,092,163	30,329,555	84,949,568	Funds will be used in conjunction with other non-federal funds for leverage and to ensure that minimal HOME funds are invested in each project.
NHTF	Public-federal	Rehabilitation for rental New construction for rental	4,427,950	0	3,313,674	7,741,624	17,711,800	Funds will be used in conjunction with other non-federal funds for leverage and to ensure that minimal NHTF funds are invested in each project.
HOPWA	Public-federal	Permanent housing in facilities Permanent housing placement Short-term or transitional housing facilities Short-term rent, mortgage, and utility assistance Supportive services Tenant-based rental assistance	2,627,118	0	0	2,627,118	12,296,500	Funds will be leveraged as much as possible with other sources and subrecipients will be required to show sources of matching funds.
ESG	Public-federal	Conversion and rehabilitation for transitional housing	4,246,371	0	0	4,246,371	16,985,484	Required match plus additional leverage will

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		Financial assistance						be used with federal funds.
		Overnight shelter						
		Rapid re-housing (rental assistance)						
		Rental assistance services						
		Transitional housing						

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Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

CDBG

CDBG awards over $300,000 have a Cash Match requirement. The Cash Match requirement is 5% of CDBG funds from $300,001 to $750,000, and 10% of CDBG funds from $750,001 to $1,000,000.
Grants receive points in the competitive process for Leverage, which is additional resources provided to the project above and beyond the Cash Match requirement. Leverage resources may be cash, equipment, land or in-kind services. Up to 25 points can be awarded based on per capita leverage amounts.

ESG

The ESG program requires a 100% match, and may be either cash or in-kind. The vast majority of these resources come from local Project Sponsors. Project Sponsors are sub-recipients of ESG funds and may include nonprofits, faith-based agencies, Community Action Agencies, Community Service Boards, and local municipalities. The State Housing Trust Fund (HTF) leverages the ESG program by providing funding to supplement HUD eligible activities. HTF funds are used to fund supportive services, hotel motel vouchers, training for sub-recipients, HMIS, and Coordinated Entry.

HOPWA

The HOPWA program does not have a match requirement, but Project Sponsors are expected to leverage other resources to support their programs. Project Sponsors are sub-recipients of HOPWA funds, including nonprofit agencies and local boards of health. Most HOPWA agencies leverage resources from their local Ryan White Part B clinics for medical care and treatment, case management, transportation to and from medical appointments, and short-term emergency lodging. Several HOPWA programs link their services to the Shelter Plus Care program, which subsidizes permanent supportive housing. HOPWA agencies also use private donations and funding to support their programs, and several access foundation grants for that purpose.

NHTF

Given the 30% AMI income targeting requirements for the NHTF program, viable developments using these funds will need additional sources of funding. Applicants that are able to provide non-federal sources of funding will have a competitive advantage as set forth in the NHTF Allocation Plan.

HOME

The HOME funded single-family development program provides up to 10 points out of a total of 100 points in the competitive application to applicants who provide matched funds. HOME is used as gap financing in the construction of affordable rental units, in partnership with State and Federal Low-Income Housing Tax Credits.

If appropriate, describe publicly owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

No publicly owned land or property located within the state is used to address the needs of the ESG and HOPWA programs identified in this plan. It is possible that locally owned property may be used for projects seeking funding through the competitive application processes for CDBG, HOME, and/or NHTF. That is not a requirement, however, and that would be a local determination that DCA would have no way of knowing if that was the case at this time.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives – 91.320(c)(3)&(e)

Goals Summary Information

Table 60 – Goals Summary

Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Program	Funding	Goal Outcome Indicator	Predicted Outcome
Construction/Rehabilitation of rental units	2018	2019	Affordable housing	Entitlement and Non-Entitlement Areas within the State	Affordable Rental Housing	HOME	25,000,000	Rental units constructed	
						NHTF	4,427,950	Rental units rehabilitated	HOME: 625; NHTF: 30
Homeownership assistance	2018	2019	Affordable housing	Entitlement and Non-Entitlement Areas within the State	Homeownership Housing Preservation & Development	HOME	5,000,000	Homeowner Housing Added	87
						CDBG	1,900,000	Homeowner Housing Rehabilitated	20
Tenant-Based Rental Assistance	2018	2019	Affordable housing	Entitlement and Non-Entitlement Areas within the State	Affordable Rental Housing	HOME	0	Tenant-based rental assistance/rapid rehousing	0
Emergency shelter & transitional housing	2018	2019	Homeless	Entitlement and Non-Entitlement Areas within the State	Emergency Shelter & Transitional Housing	ESG	1,789,100	Homeless Person Overnight Shelter: Persons Assisted	7,040
Rapid re-housing assistance	2018	2019	Homeless	Entitlement and Non-Entitlement Areas within the State	Rapid Re-housing	ESG	1,771,400	Tenant-based rental assistance/rapid rehousing: Households Assisted	2,410
Homeless outreach assistance	2018	2019	Homeless	Entitlement and Non-Entitlement Areas within the State	Homeless Outreach	ESG	548,700	Other	430
Homeless prevention assistance	2018	2019	Non-Homeless Special Needs	Entitlement and Non-Entitlement Areas within the State	Homelessness Prevention	ESG	562,050	Homelessness Prevention: Persons Assisted	840
HOPWA Tenant-Based Rental Assistance	2018	2019	Non-Homeless Special Needs	Entitlement and Non-Entitlement Areas within the State	Rapid Re-housing Homelessness Prevention Emergency Shelter & Transitional Housing	HOPWA	937,400	Tenant-based rental assistance/rapid rehousing (Persons Assisted)	175
HOPWA Housing Assistance	2018	2019	Non-Homeless Special Needs	Entitlement and Non-Entitlement Areas within the State	Rapid Re-housing Homelessness Prevention	HOPWA	1,843,433	HIV/AIDS Housing Operations (Persons Assisted)	180

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					Emergency Shelter & Transitional Housing				
Buildings	2018	2019	Non-housing Community Development	Entitlement and Non-Entitlement Areas within the State	Public Facilities	CDBG	4,000,000	Public facility or infrastructure activities other than low/moderate income housing benefit (Persons assisted)	2,000
Infrastructure	2018	2019	Non-housing Community Development	Entitlement and Non-Entitlement Areas within the State	Public Facilities	CDBG	21,850,000	Public facility or infrastructure activities other than low/moderate income housing benefit (Persons assisted)	8,000
Employment Incentive Program	2018	2019	Non-housing Community Development	Entitlement and Non-Entitlement Areas within the State	Job Creation	CDBG	8,000,000	Jobs created/retained	400
Immediate Threat & Danger Program	2018	2019	Non-housing Community Development	Entitlement and Non-Entitlement Areas within the State	Public Facilities	CDBG	500,000	Jobs created/retained	1,000
Redevelopment	2018	2019	Non-housing Community Development	Entitlement and Non-Entitlement Areas within the State	Public Facilities Job Creation	CDBG	1,500,000	Jobs created/retained	15

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Table 61 – Goal Descriptions

1	**Goal Name**	Construction/Rehabilitation of Rental Units
	Goal Description	This activity involves the new construction and rehabilitation of rental units. The funding amount represents the maximum amount for the activity not to be exceeded.
2	**Goal Name**	Homeownership Assistance
	Goal Description	This activity includes the construction of new homeownership units, the rehabilitation of owner-occupied units, and the provision of down payment assistance to income-eligible home buyers. The allocation for HOME is a maximum amount not to be exceeded. The CDBG funding for this activity is an estimate based upon past requests as total funding will be determined through an annual competition.
3	**Goal Name**	CHDO Pre-development Loans
	Goal Description	Funds will be used to provide loans to qualified CHDOs with potential housing projects to determine if they are viable.
4	**Goal Name**	CHDO Operating Assistance
	Goal Description	These funds will be provided to qualified CHDOs to assist them in building capacity.
5	**Goal Name**	Tenant-based Rental Assistance
	Goal Description	Funds will be used to provide assistance with rent, utilities, and security and utility deposits for households with disabled individuals. The funding allocation for this program is an amount not to be exceeded.
6	**Goal Name**	Buildings
	Goal Description	Funds will be provided to non-entitlement local governments to construct public facilities through an annual competitive application process. Because there is no way to predict the number of applications for this activity and what will be awarded, the allocation and projected goal outcome is based upon past performance.
7	**Goal Name**	Infrastructure
	Goal Description	Funds will be provided to non-entitlement local governments through an annual competition to carry out infrastructure projects including, but not limited to, water and sewer line installation, drainage projects, sidewalk construction, and road improvements. The allocation and goal outcome indicators are based upon past performance as there is no way to determine how many applications for this activity will be received and approved for funding.
8	**Goal Name**	Immediate Threat and Danger Program
	Goal Description	Funds will be provided to non-entitlement local governments to construct public facilities through an annual competitive application process. Because there is no way to predict the number of applications for this activity and what will be awarded, the allocation and projected goal outcome is based upon past performance.
9	**Goal Name**	Economic Development
	Goal Description	Funds are provided to local governments, nonprofits, and for-profit organizations to carry out activities that result in job creation or retention primarily for low to moderate-income persons. The allocation and goal outcome indicators are based upon past performance as there is no way to determine how many applications for this activity will be received and approved for funding.

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10	**Goal Name**	Redevelopment
	Goal Description	Funds are made available to local governments to assist with the implementation of economic and community development projects that result in job creation or retention or the elimination of slums and blight. The allocation and goal outcome indicators are based upon past performance as there is no way to determine how many applications for this activity will be received and approved for funding.
11	**Goal Name**	Emergency Shelter & Transitional Housing
	Goal Description	Essential services are provided to homeless families and individuals in emergency shelters/transitional housing programs by entities operating emergency shelters and transitional housing programs, issuing hotel/motel vouchers, in the absence of adequate or appropriate shelter based upon documented needs in areas where rapid re-housing or outreach programs exist. Eligible costs are noted in the application guidelines for each type of housing assistance.
12	**Goal Name**	Rapid Re-housing Assistance
	Goal Description	Funds are made available to short-term and medium-term payments for rents or utilities. Where funds are provided, assistance may be tenant or project-based for homeless individuals or families (rapid re-housing), or individuals or families at risk of homelessness (homelessness prevention). For this goal, regional implementations are encouraged.
13	**Goal Name**	Homeless Prevention Assistance
	Goal Description	Funds are provided for rental assistance activities including: housing search, mediation or outreach to landlords, legal services, credit repair, providing security or utility deposits, utility payments, rental assistance for a final month at a location, assistance with moving costs and other activities (including hotel/motel vouchers) that are effective at (a) stabilizing individuals and families in their current housing (homelessness prevention); or (b) (quickly moving such individuals and families to other permanent housing (rapid re-housing).
14	**Goal Name**	Homeless Outreach Assistance
	Goal Description	Funds are distributed to sustain provision of essential services necessary to reach out to unsheltered homeless people; connect them with emergency shelter, housing, or critical services; and provide urgent, non-facility-based care to unsheltered homeless people who are unwilling or unable to access emergency shelter, housing, or an appropriate health facility. For the purposes of this section, the term ''unsheltered homeless people'' means individuals and families who qualify as homeless under paragraph (1)(i) of the ''homeless'' definition under § 576.2. The eligible costs and requirements for essential services consist of: Engagement; Case management; Emergency health services; Emergency mental health services; and Transportation.
15	**Goal Name**	HOPWA Tenant-based Rental Assistance
	Goal Description	Funds are allocated to provide time-limited assistance that is designed to prevent homelessness and to help low-income people with HIV and AIDS to live independently.
16	**Goal Name**	HOPWA Housing Assistance
	Goal Description	Funds are provided for eligible housing activities as named in current HUD regulations (24 CFR 574.300) that include but are not limited to the following: Facility-based Housing, Short-term Supportive Housing/Temporary Shelter, Permanent Housing Placement, Rental Assistance (including Shared Housing), and Homelessness Prevention.

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AP-25 Allocation Priorities – 91.320(d)

Introduction:

This section introduces the State of Georgia's allocation priorities for each of the five Consolidated Plan programs. Percentages for all programs are calculated after the administrative set-aside has been taken. Percentages are rounded up as applicable as the table does not allow for anything but whole numbers.

Table 62 – Funding Allocation Priorities

	Goals															
	Construction and/or Rehab Rental Units (%)	Homeowner Assistance (%)	CHDO Loans (%)	CHDO Operating (%)	TBRA (%)	Buildings (%)	Infrastructure (%)	Immediate Threat & Danger Program (%)	Economic Development (%)	Redevelopment (%)	Emergency Shelter & Transitional Housing (%)	Rapid Re-Housing Assistance (%)	Homeless Outreach Assistance (%)	Homeless Prevention Assistance (%)	HOPWA TBRA (%)	HOPWA (%)
CDBG	0	5	0	0	0	11	58	1	21	4	0	0	0	0	0	0
HOME	80	20	0	0	0	0	0	0	0	0	0	0	0	0	0	0
NHTF	100	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
HOPWA	0	0	0	0	0	0	0	0	0	0	0	0	0	0	34	66
ESG	0	0	0	0	0	0	0	0	0	0	38	38	12	12	0	0

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Reason for Allocation Priorities

HOME

The percentages for HOME reflect the totals of anticipated FFY18 funding and estimated program income receipts. HOME priorities are based upon the needs identified through the analysis of available data on affordable rental and homeownership housing for all populations as well as through input received from the public during the citizen participation process.

NHTF

The percentages for NHTF reflect the totals of anticipated FFY18 funding and estimated program income receipts. The NHTF funds are only available for the construction and rehabilitation of rental units at 30% of the AMI. The Georgia NHTF Allocation Plan describes how the State of Georgia intends to use its NHTF funds to address priority housing needs and how the State will distribute the NHTF allocation. Moreover, the NHTF Allocation Plan describes the activities that may be undertaken, including how Applicants and projects will be selected. NHTF priorities will also receive input from the public during the citizen participation process.

CDBG

Allocation priorities as represented by the percentages in the table above are based upon the demand-driven nature of the State CDBG Program. Because needs vary throughout the state and units of local government are closer to the community and economic development needs of their geographies, DCA provides technical assistance and coordination services to local interests for the development of locally driven initiatives, partnering with public and private initiatives to strengthen rural communities.

CDBG has a unique method of distribution from the other Consolidated Plan funds as most CDBG funds are allocated through the Annual Competition. This allows local governments to establish local priorities; however, because the funding for the Annual Competition is competitive, applicants that describe and document significant needs receive a high priority for funding. Also, applications for funds allocated to the set-asides (Economic Development, Redevelopment, and Immediate Threat and Danger) are reviewed based on threshold criteria that require a review of described and documented needs. Note that the ultimate geographic distribution of assistance cannot be predicted.

See the State of Georgia Method of Distribution for its State CDBG Program for further details. The percentages in the table are based on the dollar amounts planned for each set-aside (Immediate Threat, Economic Development, and Redevelopment) with remaining funds for the CDBG Annual Competition (Buildings, Infrastructure and Housing). The allocation priorities provided for Buildings, Infrastructure, and Housing are based on historical information only and do not reflect State allocation priorities. Allocation priorities under the Annual Competition are determined by local governments. Allocation priorities (and percentages) may change based on the needs and decisions of local governments as they assess their own needs and priorities. Therefore, the allocation priorities are provided as estimates only and are not meant to limit the State CDBG program or otherwise change the State's Method of Distribution.

HOPWA & ESG

HOPWA priorities are determined by the local needs identified by DCA's regional Project Sponsors in their funding applications. HOPWA priorities are also informed by input gathered from consumers, service providers, state agencies, local governmental entities, and other stakeholders at regular meetings such as the Ryan White Part A Housing Committee and the statewide Georgia Planning and Advocacy Council (GPAAC). Funding priorities, and how those funds will be allocated are contained in the annual Method of Distribution.

ESG prioritizes rapid re-housing and emergency shelter. In determining funding allocations, DCA's ESG program seeks input from the Balance of State Continuum of Care; and the eight local CoCs throughout the state, to rank the needs of those planning bodies and communities. Prevention assistance and street outreach tend to be lower ranked project types based on the input received from the CoCs. ESG priorities are presented annually to the State Housing Trust Fund Board, which votes to approve the final funding distribution guidelines.

How will the proposed distribution of funds address the priority needs and specific objectives described in the Consolidated Plan?

Funds will be allocated to programs and activities that have been developed to meet the needs identified in the Annual Goals and Objectives section in AP-20. The percentage of funding allocated for each goal is based upon the level of need determined through these sources as well as the amount of carryover funds available for each and the anticipated demand for funds from developers, subrecipients, and other potential beneficiaries of these activities. The allocation figures were developed to address the unmet needs in the areas of affordable housing, homelessness, non-housing community development, and special needs households throughout the state of Georgia. As projects are funded and completed in all areas, it is anticipated that these needs will decrease as a result of the additional resources that are created to meet these needs.

ESG & HOPWA

For ESG and HOPWA, the funds are distributed based on the priorities identified by the Project Sponsors and other local planning bodies. For both the ESG and HOPWA programs, the primary goal of all project types is to provide stable, permanent housing or to provide temporary housing interventions and supportive services that lead to that ultimate goal. During the last Consolidated Plan period, it was identified that consumers who were primarily facing financial crises, but who had the ability to become self-sufficient within a relatively short period of time, do better with independent housing. Hence, the demand increased for rapid re-housing under ESG, and TBRA in the HOPWA program. Also, because the Balance of State contains many rural areas that are widely spread geographically and that also have very high instances of stigma related to HIV/AIDS, the TBRA program has been found to be the most effective housing solution. DCA's funding distribution takes this into account and dedicates over one-third of its ESG and HOPWA funds to these programs (rapid re-housing and TBRA). Supportive services, especially case management, are essential in helping consumers attain self-sufficiency. Funds are distributed appropriately to support the housing in both the programs. Although the need is very high considering

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the poverty levels in the Balance of State area, the allocated funds will be able to assist those with the highest needs with very low-income and multiple barriers, including but not limited to, mental health, substance abuse, criminal backgrounds, poor or no credit, and stigma related to sexual identity.

NHTF

The Georgia NHTF Allocation Plan describes how the State of Georgia intends to use its NHTF funds to address priority housing needs and how the State will distribute the NHTF allocation. Moreover, the NHTF Allocation Plan describes the activities that may be undertaken, including how Applicants and projects will be selected.

AP-30 Methods of Distribution – 91.320(d)&(k)

Introduction:

This section discusses the Methods of Distribution for the CDBG Annual Competition, Employment Incentive Program, Redevelopment Fund Program, and Immediate Threat and Danger Program.

Distribution Methods

State Program Name: CDBG Annual Competition

Describe the state program addressed by the Method of Distribution

Funds are made available to local governments through an annual competitive process. The State has designed its CDBG program to address community priorities, ensure fairness in the treatment of all applications, and support activities that principally benefit low- and moderate-income persons. In the Annual Competition, eligible local governments may apply for either a Single-Activity or Multi-Activity Program. A Single-Activity Application must be structured to address problems within one of the following three areas: (a) housing, (b) public facilities, or (c) economic development. A Multi-Activity Application must involve two or more activities that address community development needs in a comprehensive manner within more than one of the areas listed above. Both the Single Activity and Multi-activity grant applications may qualify for Revitalization Area Strategy bonus points.

Describe all of the criteria that will be used to select applications and the relative importance of these criteria.

Single- or Multi-Activity applications will be rated separately to assign points for feasibility, impact and strategy. Demographic scores will be calculated jointly for cities and counties.

Similar type applications will be rated and scored against each of the following factors: demographic need, feasibility, strategy, and impact. These factors including any additional and/or supplemental information or data, analyses, documentation, commitments, assurances, etc. may be required or requested by DCA for purposes of evaluating, rating, and selecting applicants under this program. The maximum score is 525 points.

Factor 1: Demographic Need

Demographic Need points are based on three factors:

- Absolute number of people in poverty
- Percent of people in poverty
- Per capita income

The number and percentage of persons in poverty will be based on the U.S. Bureau of the Census's most recent data that is consistent as of the same point of time for all applicants. Per capita income will be based on the most recent available data that is consistent as of the same point of time for all applicants.

Factor 2: Feasibility

Feasibility points will be based on an analysis of how each application addresses the following factors:

- Verification and reasonableness of cost
- Documentation of all project financing sources
- Completeness of any needed engineering, architectural and or site plans and specifications
- Verification of control of any required property
- Evidence of administrative capacity to undertake an approved activity
- Compliance with applicable state and federal laws
- Reasonable project timetables

Factor 3: Strategy

Strategy points will be based on an analysis of how each application addresses the following factors:

- Alternative solutions
- Steps taken to adopt policies or ordinances to prevent the reoccurrence of the identified problem
- Financial efforts made to address the identified problems
- Extent of benefit to persons of low- and moderate-income
- For multi-activity applications, support of comprehensive community or neighborhood conservation, stabilization and revitalization

Factor 4: Impact

Impact points will be based on an analysis of how each application addresses the following factors:

- Number of persons benefiting
- Cost per person benefiting
- Project's impact on the benefiting population's quality of life, living environment or opportunities for economic advancement
- Documented severity of need
- Impact of the project on the identified need or problem

Leverage of Additional Resources:

Leverage includes additional resources committed to and directly related to the project, including cash above the required minimum cash match amount, the purchase of equipment and furnishings with non-CDBG funds, and additional grants and loans from other sources. Only items that would not otherwise have been provided will be counted. A "reasonable" value must be assigned to donated and "in-kind" items.

Bonus Points for Revitalization Area Activities:

Points will be awarded for the utilization of existing state redevelopment programs, initiatives, and incentives in eligible areas.

Bonus Points for Readiness to Proceed

Points may be earned through the demonstration of a project's readiness to proceed. Points may be earned through documentation of the following factors:

- Procurement processes for professional services have been completed
- Environmental reviews are in process or have been completed
- Engineering and architectural design plans are finalized and have been submitted to appropriate local, state or federal authorities
- All real-estate (including easements and right of ways) needed for the project have been acquired
- Plans and specifications are finalized and have been approved by appropriate local, state or federal authorities

Other equivalent documentation may be provided for housing applications that demonstrate readiness to proceed upon project award.

Bonus Points for closing Employment Incentive Program (EIP)/Redevelopment Fund (RDF) Local Revolving Loan Fund and Returning Funds

Points may be earned through the closing and returning of all funds in the community's EIP/RDF Local Revolving Loan Fund.

If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)

Application manuals and other state publications regarding the CDBG Program can be found at:

http://(will need new web address)

A complete copy of the Method of Distribution can be found at:
http://www.dca.ga.gov/communities/CDBG/index.asp

Describe how resources will be allocated among funding categories.

The Annual Allocation minus the amounts for administration, planning and set-aside programs will be allocated to this activity. Funding for this activity may be increased depending upon the demand for the CDBG set-aside programs.

Describe threshold factors and grant size limits.

Annual Competition Restrictions:

A) Only one single- or multi-activity application per general purpose local government, whether individually or jointly submitted, shall be eligible for competition.
B) Only one single- or multi-activity award may be received by any general purpose local government.
C) No recipient of a single- or multi-activity award shall be eligible to apply for or receive another single- or multi-activity award from the next fiscal year's except for recipients applying for activities within a DCA-approved Revitalization Area who may apply annually. In addition, communities designated by DCA as a "Water First Community," designated by DCA as a "PlanFirst"

community, or designated by DCA as a Georgia Initiative for Community Housing ("GICH") community may apply annually as described in the Application Manual.

Local governments that receive designations for annual eligibility under item C above must show substantial progress in implementing and spending prior grants in order to receive subsequent awards. Criteria to be considered in measuring "substantial progress" include, but shall not be limited to, percentage of funds obligated and/or expended from prior grants.

Recipients of prior CDBG funding must resolve all outstanding audits, monitoring findings or other program exceptions that involve a violation of federal, state or local law or regulation prior to award of or submission of any application to the State. In addition, recipients who fail to substantially meet their proposed accomplishments in their current CDBG project or have missed significant deadlines imposed by the State or other applicable agencies may be penalized in the subsequent year's Annual Competition.

The maximum grant amount for a single activity is $750,000 and $1,000,000 for a multi-activity request.

What are the outcome measures expected as a result of the method of distribution?

- Number of People Assisted
- Number of Jobs Created/Retained
- Number of Housing Units Assisted
- Number of Units Demolished

State Program Name: Employment Incentive Program

Describe the state program addressed by the Method of Distribution.

The Employment Incentive Program (EIP) must provide for the creation and/or retention of jobs, or job training, principally for persons who are low- and moderate-income. Typically, this includes loans to private for-profit entities or the provision of infrastructure improvements.

Describe all of the criteria that will be used to select applications and the relative importance of these criteria.

Factor 1: Demographic Need

Demographic Need points are based on three factors:

- Absolute number of people in poverty
- Percent of people in poverty
- Per capita income

Factor 2: Program Feasibility

The following factors will be considered:

- Organizational status of the business
- Past credit history of the business
- Business' historical sales and financial performance
- Viability of the business model

- Management capacity
- Reasonableness of the business' financial and market projections and assumptions
- Business management and development team's ability to carry out the project as proposed
- Project's compliance with the federal appropriateness requirements including underwriting and public benefit (For direct loans this requires the complete disclosure of sub-recipients' financial situation)
- Verification of project costs
- Verification of project financing sources
- Adequacy and reasonableness of the job commitment
- Completeness of any needed engineering plans and specifications

Factor 3: Program Impact

The following factors will be considered:

- Number of jobs created and/or retained
- EIP cost per job
- Availability of jobs to low- and moderate-income persons
- Quality of jobs and employee benefits
- Project's impact on local unemployment rates

Factor 4: Program Strategy

The following factors will be considered:

- Ratio of private funds to EIP funds
- Public benefits to be achieved are reasonable and, to the extent practicable, EIP funds will not substitute for other available funds;
- Adequacy of financing strategy
- Relationship between the subrecipient’s infrastructure needs and the size and capacity of any infrastructure to be provided
- Validity of subrecipient’s commitment to fulfill hiring and investment commitments
- Local government’s financial condition
- Project's conformance to local planning and development strategy and compliance with the Georgia Planning Act
- Project's conformance to federal, state, and local laws and regulations
- Relationship to overall objectives of the EIP and CDBG Program, including the extent of benefit to persons of low- and moderate-income

If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)

Additional details including application manuals and other state publications can be found at:

http://(will need new web address)

Describe how resources will be allocated among funding categories.

Up to eight million ($8,000,000) dollars from the annual allocation to the State for the CDBG Program will be set-aside for this program.

Funds remaining in the set-aside at the end of the fiscal year may be returned to an "active status" and may be used to fund EIP applications under a subsequent fiscal year or transferred to any of the other funding categories or for State Administration, subject to the limitations of the Housing and Community Development Act. In addition, the Commissioner of DCA may adjust the EIP program set-aside periodically during the Program Year based on demand for the set-aside.

Describe threshold factors and grant size limits.

The maximum Employment Incentive Program grant is $750,000. See the program description and selection criteria for details.

What are the outcome measures expected as a result of the method of distribution?

Number of jobs created/retained

State Program Name: Redevelopment Fund Program

Describe the state program addressed by the Method of Distribution.

The Redevelopment Fund (RDF) provides flexible financial assistance to locally initiated public/private partnerships helping local governments implement projects that wouldn't proceed otherwise. The Redevelopment Fund is used to leverage investments in commercial, downtown and industrial redevelopment and revitalization projects. The Redevelopment Fund primarily focuses on the HUD national objective of "eliminating slums or blight". As a result, many smaller scale projects (in downtown areas, blighted industrial areas, etc.) will be more competitive for Redevelopment Fund financing. The Redevelopment Fund may be combined with other DCA CDBG programs to reduce the economic challenges of redevelopment projects and increase their investment potential.

Describe all of the criteria that will be used to select applications and the relative importance of these criteria.

Redevelopment Fund applications will be rated and scored against each of the following factors:

Factor 1: Demographic Need

Demographic Need points are based on three factors:

- Absolute number of people in poverty
- Percent of people in poverty

- Per capita income

The number and percentage of persons in poverty will be based on the U.S. Bureau of the Census' most recent data that is consistent as of the same point of time for all applicants. Per capita income will be based on the most recent available data that is consistent as of the same point of time for all applicants.

Factor 2: Feasibility

Feasibility points will be based on an analysis of how each application addresses the following factors:

- Eligibility of proposed activity
- Reasonableness of cost
- Compliance with applicable state and federal laws
- Project timetables
- Confirmation of all required resources
- Completeness of proposed plans and specifications
- Reasonableness of any sub-recipient's proposed business plan(s) and financial projections
- Reasonableness of any site clean-up proposal and plan
- Conformance with applicable underwriting and review requirements contained in 24 CFR Part 570

Factor 3: Strategy

Strategy points will be based on the following factors:

- An analysis of the severity of need
- Documentation that a project's public benefits will exceed project costs
- Documentation that the proposed strategy meets the eligibility criteria and the national objectives of the CDBG program
- Documentation that the project complies with all local ordinances, state law and state Regulation

Factor 4: Leverage

Leverage points are awarded based on a firm commitment of additional resources directly related to the project, including capital costs and new funds for operation of any proposed program(s). A minimum leverage ratio of 1 to 1 must be documented in order to receive points under this criterion. A "reasonable" value must be assigned to donated and "in-kind" items. The leverage score will be calculated based on the total value of leverage for each applicant. Applications with no leverage will receive no points.

If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)

Additional details including application manuals and other state publications can be found at:

http://(will need new web address)

Describe how resources will be allocated among funding categories.

Up to one and a half million ($1,500,000) dollars from the annual allocation to the State for the CDBG Program will be set-aside for this program.

Funds remaining in the set-aside at the end of the fiscal year may be returned to an “active status” and may be used to fund RDF applications under a subsequent fiscal year or transferred to any of the other

funding categories or for State Administration, subject to the limitations of the Housing and Community Development Act. In addition, the Commissioner of DCA may adjust the RDF program set-aside periodically during the Program Year based on demand for the set-aside.

Describe threshold factors and grant size limits.

The maximum Redevelopment Fund grant is $750,000. See program description and selection criteria for details.

What are the outcome measures expected as a result of the method of distribution?

Decrease in slum or blight and/or benefit to low- and moderate-income persons

State Program Name: Immediate Threat and Danger Program

Describe the state program addressed by the Method of Distribution.

Funds distributed through the Immediate Threat and Danger Program must be used to address an event or situation that has a particular urgency and uniqueness that adversely affects a community and its citizens and where other financial resources are not available to meet such needs. The State certifies that the activity meets the immediate needs of the community because the existing condition poses a threat to the health or welfare of the community and other financial resources are unavailable.

Describe all of the criteria that will be used to select applications and the relative importance of these criteria.

Up to $500,000 from each federal fiscal year's allocation to DCA for CDBG will be set-aside for this program. The Immediate Threat and Danger Program is intended to respond to events or situations which have a particular urgency and uniqueness which adversely affect or impact the health or welfare of the community and its citizens and where other financial resources are not available to meet such need. To be considered, the event or situation must have a sense of urgency and be of recent origin or have recently become urgent. Recent origin is defined as a condition that has developed or become critical generally within 18 months of application. Ample description of the cause of the threat and probable ramifications must be provided. Grant amounts under this program generally cannot exceed $50,000.

Generally, a grant awarded under this program cannot be more than 50% of the project cost. The applicant (local government) must provide at least 10% of the project cost. These requirements may be waived in extraordinary circumstances. In case of a "major disaster," the Commissioner will determine the extent of DCA involvement. The Commissioner may waive the maximum grant amount and other requirements in case of a "major disaster."

Applications can be submitted at any time and funds will be awarded to eligible applicants who meet the threshold described above, as long as funds remain in the set-aside amount. Applications must include a certification that other financial resources are not available to meet the identified needs; the situation poses a serious and immediate threat, and identifies the other sources of project funding.

Upon receipt of a request for assistance, DCA staff will review the application for completeness and degree of urgency. Staff may visit the locality to inspect the problem cited by the applicant and may consult with

other appropriate state, federal or local agencies to determine the extent of the threat prior to funding decisions. After staff recommendations, the Commissioner, using the same criteria and based on staff recommendations, will approve or deny the request and transmit the decision to the local government.

If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)

Application manuals and other state publications with program details can be found at the web link below:

http://(will need new web address)

Describe how resources will be allocated among funding categories.

Up to $500,000 from each federal fiscal year's allocation to DCA for CDBG will be set-aside for this program. In case of a "major disaster," the Commissioner will determine the extent of DCA involvement. The Commissioner may waive the maximum grant amount and other requirements in case of a "major disaster." In addition, the Commissioner of DCA may adjust the ITAD program set-aside periodically during the Program Year based on demand for the set-aside.

Describe threshold factors and grant size limits.

The maximum grant request for the Immediate Threat and Danger Program is $50,000. Note that the maximum grant amount for the Immediate Threat and Danger Program may be increased.

What are the outcome measures expected as a result of the method of distribution?

- Number of people assisted
- Number of housing units assisted
- Number of units demolished

AP-40 Section 108 Loan Guarantee – 91.320(k)(1)(ii)

Will the state help non-entitlement units of general local government apply for Section 108 loan funds?

Yes.

Available Grant Amounts

DCA may set-aside a multi-year, cumulative total of up to twenty percent (20%) of its most recent CDBG allocations plus any CDBG program income for Pledge of Grants that will be used as security for notes and other obligations issued by units of non-entitlement local government to Section 108 of the Housing and Community Development Act of 1974, as amended.

For projects that would provide extraordinary public benefit, job creation, and private investment, the DCA Board of Directors may approve allocation and loan amounts that exceed the twenty percent (20%) set-aside and/or maximum loan guarantee amounts. However, in no event may the amounts pledged exceed the limits contained in 24 CFR Section 570.705(a) or up to five (5) times the amount of its last CDBG grant less the amounts of any unpaid balances previously guaranteed.

Local governments interested in obtaining Section 108 financing must cover their own application preparation and administration costs in order to be competitive. Certain underwriting and issuance costs required by HUD in order to participate in the program are allowable and will not affect an application's competitiveness; however, all "soft costs" not necessary to cover HUD-required underwriting and issuance costs are not eligible for inclusion under Section 108 financing and must be paid from non-Section 108 sources. A one-time, upfront financing fee is paid by the borrower to HUD to offset the credit subsidy costs of the guaranteed loan as required in 24 CFR Section 570.712.

The Maximum Loan Guarantee Amount for the Section 108 program is $5,000,000. In the interest of limiting exposure and promoting a diversified portfolio, the Department reserves the right to limit the amounts "pledged" to any one unit of local government or business interest.

Acceptance process of applications

Upon receipt of a pre-application under this program, staff will review the pre-application for completeness and for evaluation against the various rating and selection factors. Applications that contain insufficient information or documentation to be evaluated may be returned to the locality without further review.

The staff may conduct site visits and hold discussions with applicants and proposed sub-recipients for the purposes of confirming and evaluating information contained in the pre-application or application. The staff may consult with other appropriate government and private entities in the course of reviewing and evaluating information contained in pre-applications and applications. The scores obtained for the various selection factors will be totaled and only those applicants with scores of at least 325 points will be considered for a Pledge of Grants.

Section 108 Applications will be rated and scored against each of the following factors:

Review Factors	Maximum Points Available
Demographic Need	90 points
Program Feasibility	120 points
Program Impact	120 points
Program Strategy	120 points
Bonus (for Credit Enhancement)	25 points
Total Available Points	475 points

Table 63 – Distribution Methods by State Program

AP-45 Community Revitalization Strategies – 91.320(k)(1)(ii)

Will the state allow units of general local government to carry out community revitalization strategies?

Yes.

State's Process and Criteria for approving local government revitalization strategies

While the State does not approve local government revitalization strategies, its programs do set out program-specific requirements for revitalization strategies.

HOME

For the construction of affordable rental units, developments utilizing HOME Rental Housing Loan funds may be eligible to receive points under the Qualified Allocation Plan (QAP), the document that governs the allocation of Low-Income Housing Tax Credits and HOME funds, if the development contributes to a concerted community revitalization plan. Additional points are awarded if the development is also located in a Qualified Census Tract. DCA defines the requirements for a concerted community revitalization plan in the QAP.

Revitalization plans are also considered in the rehabilitation or construction of single-family homes. In the grant application, applicants are instructed to include a community redevelopment plan that addresses affordable housing. Points are awarded in the scoring process if the local government has adopted the plan within the past four years, public input occurred during the development of the plan, and the application target area is included in the plan.

CDBG

Five points apiece can be awarded for projects meeting the criteria for Revitalization Area threshold requirement, local redevelopment tools, investment partnerships, and collaboration.

AP-50 Geographic Distribution – 91.320(f)

Description of the geographic areas of the state (including areas of low-income and minority concentration) where assistance will be directed

Geographic Distribution

The State does not have any geographic set-asides for any of the five HUD programs covered under this plan.

Rationale for the priorities for allocating investments geographically

The State does not assign funding allocation priorities for any of the five consolidated programs based on a geographic method or dedicate a specific percentages or amounts of funding to particular targeted areas. However, the State will distribute development resources in proportion to development needs in the State to satisfy the community need, effort, and preventive action to create and maintain decent affordable housing.

CDBG

For the CDBG program, the State does not anticipate any funding set-asides for specific geographic areas of Georgia. The CDBG Annual Competition does give bonus points to applicants proposing activities in an approved Revitalization Area Strategy (RAS) area. Depending on the competition, funding may not be allocated to these applicants but only to the extent the bonus points affect the CDBG geographic distribution of funded projects. Funding is limited to jurisdictions that do not receive direct CDBG entitlement funds from HUD.

HOME

Under the HOME Program, there are also no geographic set-asides for specific geographic areas of Georgia.

NHTF

The NHTF funds will be available for distribution throughout the State and awarded on a competitive process to applicants that address the criteria outlined in the current NHTF allocation plan and through the subsequent NOFA.

ESG & HOPWA

For the ESG and HOPWA programs, the State does not anticipate any funding set-asides for specific geographic areas of Georgia. The State prioritizes the Georgia non-entitlement area and the Balance of State CoC geographic areas for the distribution of ESG funds. The State will allocate a minimum of 65% of ESG funds in the annual competition to the Georgia non-entitlement geographic area. By formula, HOPWA funds are allocated to eligible states and Eligible Metropolitan Statistical Areas (EMSAs) based on the numbers of people living with HIV or AIDS in those areas. States and metropolitan areas coordinate use of HOPWA funds with their respective Consolidated Plans, a collaborative process, which establishes a unified vision for community development actions. In Georgia, HUD provides HOPWA formula funds to two (2) other government entities in addition to DCA. States and metropolitan areas coordinate use of

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HOPWA funds with their respective Consolidated Plans, a collaborative process, which establishes a unified vision for community development actions. HOPWA eligible metropolitan areas receive their HOPWA allocations directly from the Department of Housing and Urban Development and have specific guidelines and separate processes not included within the State's program.

The HOPWA Program provides resources and incentives to devise long-term comprehensive strategies for meeting the housing needs of low-income Persons living with HIV/AIDS (PLWHA). HOPWA funding is sub-awarded to Project Sponsors including nonprofit agencies, health departments directly working with Persons living with HIV/AIDS (PLWHA) within the communities and or government housing agency. To the extent determined under State law by DCA, private, secular or faith-based nonprofit organizations are also eligible to apply for funds. These agencies are responsible for designing their own rules for programs, their program policies and design must be within the scope of HOPWA regulations and guidance from HUD.

"HOTMA" is the Housing Opportunity through Modernization Act, or the short title of the bill and subsequent Public Law 114-201. HOTMA included modernization of the HOPWA formula, which was rolled into the law with other provisions related to HUD. HOTMA was signed into law July 29, 2016. The law provides that HOPWA modernization, based on "living with HIV" data, will be effective for the 2017 allocation year. Previously, HOPWA funds were allocated to eligible states and Eligible Metropolitan Statistical Areas (EMSAs) that meet the minimum number of cumulative AIDS Cases. The HOPWA Modernization Act has shifted the focus to the changing scenario where with HIV treatment and care more and more people are living with HIV and not developing AIDS. States and metropolitan areas coordinate use of HOPWA funds with their respective Consolidated Plans, a collaborative process, which establishes a unified vision for community development actions. In Georgia, HUD provides HOPWA formula funds to 3 jurisdictions, DCA for 126 counties, City of Atlanta for the Atlanta Eligible Metropolitan Statistical Area (EMSA) including 29 counties and Augusta-Richmond County government for 4 Augusta MSA counties and 2 South Carolina counties.

Affordable Housing

AP-55 Affordable Housing – 24 CFR 91.320(g)

Introduction:

Assistance in FFY2018 for will come primarily from HOME and NHTF, however CDBG, ESG, and HOPWA will also be included. The numbers below are based upon the anticipated completion numbers for projects in each of the categories.

Table 64 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households to be Supported	
Homeless	8,000
Non-Homeless	840
Special-Needs	320
Total	9,160

Table 65 - One Year Goals for Affordable Housing by Support Type

One Year Goals for the Number of Households Supported Through	
Rental Assistance	0
The Production of New Units	655
Rehab of Existing Units	87
Acquisition of Existing Units	0
Total	742

AP-60 Public Housing - 24 CFR 91.320(j)

Introduction:

The State of Georgia does not operate any public housing units directly nor receive any funding to do so. The State does review the Annual and Five-Year Plans of public housing authorities throughout the state to determine consistency with Georgia's Consolidated Plan and issues certifications to these authorities upon request documenting this fact.

Actions planned during the next year to address the needs to public housing

No actions are planned by the State to specifically address the needs of public housing residents to the exclusion of other classes. These residents are eligible to participate in any of the ongoing programs of the State based upon their eligibility as determined by program regulations.

Actions to encourage public housing residents to become more involved in management and participate in homeownership

Public housing residents are eligible to participate in the home buyer programs offered through DCA and its subrecipients as long as they meet all eligibility criteria. The State plans no actions on its part to involve these residents in management but encourages the various public housing authorities within the state to do this.

If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance

The State agency monitors the performance of existing PHAs and provides technical assistance to troubled PHAs throughout the state.

AP-65 Homeless and Other Special Needs Activities – 91.320(h)

Introduction

The Georgia Department of Community Affairs (DCA) has established the primary goal of reducing the number of unsheltered homeless individuals and families. The information contained below outlines goals, strategies and performance measures to be utilized for all ESG sub-recipients.

Overall Goals

- Reduce the number of unsheltered individuals and families, as established in the Homeless Point in Time Count, within the BoS ESG non-entitlement by 1% each year by placing emphasis on high utilization of emergency shelters and transitional housing beds.
- Reduce length of stay for clients in emergency shelter programs in order to provide services to additional households. One's length of stay should generally be no longer than 90 days for shelters.
- Increase placements into permanent housing for homeless individuals and families from Emergency Shelter by 5% each year.
- Prevent individuals and families from becoming homeless – either unsheltered or sheltered, by 3% each year. Follow-up checks will be made at 3 months and 6 months post discharge.
- Increase the percentage of individuals and families remaining housed for 3 months by 2% each year.

Describe the jurisdiction's one-year goals and actions for reducing and ending homelessness including

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

For each Street Outreach program, performance will be measured based on the following standards:

1. An increase in the number of contacts with unduplicated individuals made during outreach.
2. An increase in the percentage of households that access emergency shelter or transitional housing.
3. An increase in the percentage of discharged households that access permanent housing.
4. An increase in the percentage of households that increase cash and non-cash income during program enrollment.

In addition, DCA will pursue the following overarching goals:

- Expand DCA's harm reduction program for statewide implementation to ensure persons who are chronically homeless have the widest range of interventions available to them;
- Continue to provide technical assistance in assisting street outreach programs establish policy and procedure as outreach programs begin work. DCA acts as a facilitator when street outreach teams, including PATH teams find impediments to getting homeless people the services or resources they need such as Permanent Supportive Housing;

- Targeted Street Outreach to be strongly focused on street based Engagement and Case Management that should lead to one goal, supporting homeless households in achieving some form of permanent, sustainable housing. To this end, DCA will prioritize funding towards Street Outreach teams that collaborate with Rapid Re-Housing programs to provide one seamless service.

Addressing the emergency shelter and transitional housing needs of homeless persons

*For each Emergency Shelter program, performance will be measured based on the following standards:

1. An overall bed utilization rate of 80%.
2. The average length of stay of the households served should be no longer than 60 days.
3. An increase in the percentage of discharged households that secure permanent housing at exit by 5% each year.
4. An increase in the percentage of households that increase cash and non-cash income during program enrollment.

For each Transitional Housing program, performance will be measured based on the following standards:

1. An overall bed utilization rate of 80%.
2. The average length of stay for households served should generally be no longer than nine months. An increase in the percentage of discharged households that secured permanent housing at exit by 5% each year.
3. An increase in the percentage of households that increase cash and non-cash income during program enrollment.

*Programs serving the chronically homeless, or chemically dependent clients, or shelters with minimal barriers to entry may be held to different standards than programs providing other levels of assistance.

In addition, DCA will pursue the following overarching goals:

1. Provide housing necessary for Georgia's homeless to break the cycle of homelessness to provide shelter/emergency housing to an estimated 7000 homeless individuals (transitional and shelter) through implementation of Georgia's ESG Program;
2. Provide decent affordable housing to an estimated 2,410 persons who would otherwise be living on the street or in shelters/transitional housing programs through implementation of the Rapid Re-Housing Program funded through Georgia's ESG Program;
3. Continue to work with providers to increase the accessibility to the Rapid Re-Housing program for households with children throughout the State; and Through the administration of the Balance of State (152 County) Continuum of Care Plan, DCA will continue to monitor the housing stability of CoC funded transitional housing providers and provide technical assistance to agencies that fall below 70% housing stability (clients leaving transitional housing that move to a permanent destination).

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

- Continue to educate DCA Grantees in the housing first model and encourage them to prioritize Rapid Re-Housing funds towards ending homelessness;
- Provide technical assistance in the implementation of Outreach and Rapid Re-Housing grants towards increasing the number of homeless households served;
- Target Prevention dollars to communities that are able to demonstrate most need;
- Through the use of HMIS data, continue to monitor the length of time households are homeless, and then establish targets for agencies to assist households into permanent housing;
- Continue DCA's research into recidivism, and establish further research to assist agencies at a program level towards reducing the level of recidivism;
- Continue DCA's long-term commitment to Permanent Supportive Housing.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs

DCA continues to evaluate policies across the State in order to help low-income individuals and families to avoid becoming homeless, especially extremely low-income individuals and families who are being discharged from publicly funded institutions and systems of care, such as healthcare facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions. Currently all ESG subrecipients are required to follow HUD eligibility guidelines regarding individuals and families being discharged from institutions to receive homeless services. DCA collaborates with both the Department of Corrections and the Department of Behavioral Health and Developmental Disabilities on two projects designed to transition individuals into the community from institutions. Planned actions for the next year are as follows:

- DCA will work with health agencies this year to develop formal policy that will promote appropriate discharge planning efforts to prevent being discharged from health care facilities to the shelters or street.
- DCA will continue to provide permanent supportive housing options for placement in community based placement options. Shelter Plus Care is a resource only for individuals who meet HUD eligibility criteria for admission into the program.

- The State of Georgia was awarded two HUD Section 811 Project Rental Assistance Demonstration Grants in 2012 and 2013. The HUD Section 811 Project Rental Assistance Demonstration Program will enable the state to expand its efforts to transition individuals from institutional to integrated, community-based settings. It is a cooperative effort at the federal level: Housing and Urban Development and Health and Human Services; and at the Georgia State Level: Departments of Community Affairs, Department of Community Health and Department of Behavioral Health and Developmental Disabilities. The program will involve private sector and nonprofit developers and organizations in the provision of 485 units of subsidized housing for the most vulnerable within the population, extremely low-income persons with disabilities. This program is expected to be at full capacity by September 2021.
- DCA will work to assist DBHDD in the planning and development of formal policy that will promote appropriate discharge planning efforts to prevent persons in mental health facilities from being discharged to the shelters or street.
- DCA will continue to partner with the Department of Community Supervision, the Department of Corrections, and the Council of Accountability Court Judges in the joint implementation of the "Re-Entry Housing Partnership" (RHP) program.

AP-70 HOPWA Goals – 91.320(k)(4)

The Housing Opportunities for Persons with AIDS (HOPWA) program, managed by HUD's Office of HIV/AIDS Housing, was established to provide housing assistance and related supportive services for low-income persons living with HIV/AIDS and their families. The eligibility criteria for beneficiaries seeking HOPWA-funded assistance include Low-income persons (at or below 80 percent of area median income) that are medically diagnosed with HIV/AIDS and their families.

One-year goals for the number of households to be provided housing through the use of HOPWA for:

Table 66 – HOPWA One-Year Goals

Short-term rent, mortgage, and utility assistance to prevent homelessness of the individual or family	60
Tenant-based rental assistance	175
Units provided in permanent housing facilities developed, leased, or operated with HOPWA funds	35
Units provided in transitional short-term housing facilities developed, leased, or operated with HOPWA funds	20
Permanent Housing Placement	65
Total	355

AP-75 Barriers to affordable housing – 91.320(i)

Introduction:

This section discusses the State of Georgia's multi-pronged approach to addressing public policy barriers to affordable housing.

Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment

Georgia has a strong commitment to making decent affordable housing available to all residents. There are many programs established to meet a significant portion of the housing needs throughout the state.

To eliminate the affordable housing barriers, the State will continue to move in the directions to meet the needs of families in need for the federal programs offered to make their lives more enjoyable. Those steps include, but are not limited to the list below:

- Collaborate with the Georgia Council on Developmental Disabilities, an advocacy group for individuals with physical disabilities and other nonprofit organizations to eliminate the barriers to purchasing a home and to improve access to affordable rental housing across the State
- Promote homeownership awareness to Georgians interested in purchasing their homes and collaborate with a number of housing counseling agencies that work with specific non-English speaking populations to ensure their clients have access to this information as well
- Collaborate with nonprofit agencies, lenders, and mortgage insurance companies who offer borrowers an opportunity to reduce cost and become successful homeowners
- Continue to fund homebuyer education and foreclosure mitigation counseling
- Implement the Continuum of Care Plan to provide a strong delivery system to meet the affordable housing and service needs of the state's homeless population
- Continue to provide housing educational opportunities to communities throughout the state through the Georgia Municipal Association. Also continue the Georgia Initiative for Community Housing (GICH) which offers participating jurisdictions technical assistance to develop local housing plans designed to enhance affordability and to address barriers to affordable housing
- Market to builders and developers DCA's initiative on creating well-built homes and how to reduce cost to make them affordable to qualified home buyers

AP-85 Other Actions – 91.320(j)

Introduction:

This section discusses other actions that the State of Georgia plans to take in FY18 to address obstacles to meeting underserved needs, foster and maintain affordable housing, reduce lead-based paint hazards, reduce the number of poverty-level families, develop institutional structure, and enhance coordination between public and private housing and social service agencies.

Actions planned to address obstacles to meeting underserved needs

Across the state, one obstacle to meeting the needs of Georgia's citizens is matching those needing housing to available rental units. DCA has sponsored the Georgia Housing Search website for a number of years to address this problem. The site provides information on units, addresses, number of bedrooms, security deposits required, proposed rents, and eligibility criteria. DCA staff will continue to do outreach to landlords about the website with the purpose of encouraging property management to list and update units on the system as units become vacant or are leased.

At the local level HOME—awarded through DCA's Community HOME Investment Program (CHIP)—and CDBG programs have become a primary source of affordable housing assistance. Because these are annual competitive programs, it is critical that local governments, nonprofit organizations, and public housing authorities are aware of the programs and what they need to provide in order to apply. DCA staff will continue to spread awareness about the program and continue to encourage participation at the local level to address these needs.

Actions planned to foster and maintain affordable housing

Preserving affordable housing units that may be lost from the publicly assisted housing inventory will be a high priority for DCA. With regard to homes owned by low- and moderate-income individuals, the preservation and rehabilitation of affordable housing through the NHTF program, and rehabilitation through the HOME and CDBG programs will continue to be a priority.

Preservation of rental housing will also be a high priority. In the NHTF program, one of the key goals is to preserve the affordable housing stock for those at or below 30% AMI. This program, through a competitive process allows developers to compete for funds that will directly benefit this population of individuals and families. In the HOME Rental Housing Loan Program, developments that received previous HOME and tax credit assistance are eligible to apply again once their period of affordability has been satisfied.

Actions planned to reduce lead-based paint hazards

All proposed rehabilitation projects for housing units built before 1978 will be evaluated for the presence of lead-based paint in accordance with 24 CFR Part 35, Subpart J. If lead-based paint hazards are found, risk assessments will be completed and all lead-related work will be performed by contractors certified to perform interim control and/or abatement work. Clearance tests will be completed to ensure that the hazard has been mitigated. All those affected by these programs will receive information to educate them on the dangers of lead paint in accordance with information disclosures required by 24 CFR Part 35, Subpart J.

Actions planned to reduce the number of poverty-level families

During the upcoming reporting period, Georgia will undertake a number of activities to reduce the number of poverty-level families. Job creation efforts as outlined in SP-70 will continue as will programs such as the Communities of Opportunity and Work Ready initiative. Students in Georgia's technical schools will have enhanced opportunities to receive tuition assistance through Georgia's HOPE scholarship program through lower grade requirements. Georgia's Career Service Centers will continue to work to provide job training opportunities to residents throughout the state. In addition, HOME awards supporting the construction and rehabilitation of homeowner housing units and rental units will continue to emphasize those applications that propose to serve more people at the lowest income levels.

The Community Development Block Grant Program includes set-aside programs directed at economic development – the Employment Incentive Program (EIP) and the Redevelopment Fund (RDF). The Method of Distribution calls for up to $8,000,000 to be set aside for EIP awards and up to $1,500,000 for RDF awards.

Employment Incentive Program

The Employment Incentive Program (EIP) is a financing program that may be used in conjunction with traditional private financing to carry out economic development projects which will result in employment of low and moderate income persons.

Many types of projects can be financed with EIP funding. However, projects creating opportunities for low and moderate income persons to advance themselves by obtaining employment, greater job security, better working conditions, job training, enhancement of workplace skills and advancement opportunities receive the greatest consideration.

Redevelopment Fund

Redevelopment projects can be the most challenging economic and community development projects a local government undertakes. The Redevelopment Fund provides flexible financial assistance to locally initiated public/private partnerships helping local governments implement projects that wouldn't proceed otherwise. The Redevelopment Fund is used to leverage investments in commercial, downtown and industrial redevelopment and revitalization projects. The Redevelopment Fund primarily focuses on the HUD national objective of "eliminating slums or blight". As a result, many smaller scale projects (in downtown areas, blighted industrial areas, etc.) will be more competitive for Redevelopment Fund financing. The Redevelopment Fund may be combined with other DCA CDBG programs to reduce the economic challenges of redevelopment projects and increase their investment potential. Some of these awards typically result in the creation of jobs when businesses relocate to revitalized buildings and areas.

Actions planned to develop institutional structure

A major gap exists with CHDO and nonprofit capacity in developing affordable housing. DCA recognizes this and will continue to encourage partnerships among agencies designed to increase their experience and knowledge. DCA will also continue to seek out opportunities for training and make these agencies aware of these as they come up.

Following are some activities to be undertaken during the upcoming program year to address gaps in housing and services for the homeless:

- In tandem with the Balance of State Continuum of Care, DCA is currently incorporating elements of the Federal Strategic Plan through the use of state funds to support projects that implement programs serving persons who are chronically homeless. The Coordinated Entry system is the mechanism whereby this implementation will take effect.
- DCA's Harm Reduction program emphasizes a Housing First philosophy, to ensure persons who are chronically homeless have the widest range of interventions available to them.
- DCA continues to work with providers to build on the successful implementation of their rapid re-housing and homeless prevention projects for households with children throughout the state. DCA continues to prioritize homeless prevention and rapid re-housing projects through the ESG program and funds them at a significant level. In addition, all DCA funded agencies are required to set goals targeted toward ending homelessness as quickly as possible and connecting families with mainstream services. DCA will continue to provide focused training and technical assistance to shelter and housing providers on the Housing First model.
- Through the implementation of a Coordinated Entry System, DCA will be able to assess all persons who are homeless upon entry into the homeless response system. This data will be used to identify systemic barriers that can be addressed through the strategic system planning.
- DCA will also further data analysis begun in tracking the length of stay and in reoccurrence studies in order to assess systematic and programmatic barriers to families moving out of homelessness and link performance to funding and the rating of projects (where appropriate). The HUD mandated tracking of System Performance Measures will provide a guide for this analysis.

Actions planned to enhance coordination between public and private housing and social service agencies

The State will continue to work closely with program partners in a wide array of areas to promote efficiency and coordination among different areas. Proposed actions in various areas are outlined below.

Public and Private Housing

- DCA will participate in various forums and networks from across the state addressing affordable housing, homelessness or special needs housing.
- DCA will support training sessions and workshops sponsored through the University of Georgia for local elected officials that are member of the Association County Commissioners of Georgia (ACCG) to ensure that counties have the essential leadership tools to meet the health, safety and welfare needs of their residents.
- DCA will join forces with the Georgia Municipal Association and the University of Georgia's Housing and Demographics Research Center to offer communities a three-year program of assistance to create a local housing strategy.
- DCA will continue to grow the HUD 811 PRA program that provides facility based housing on LIHTC properties for persons that meet DOJ Settlement Agreement eligibility requirements, and for persons exiting nursing homes under the Department of Community Health's Money Follows the Person program.

Social Service Agencies

- DCA will collaborate with the DBHDD through the Georgia Mental Health Planning Council to continue to provide resources and services to the chronically homelessness.
- DCA will participate in local and regional housing forums facilitated by the Atlanta Regional Commission and participates in the meetings sponsored by the Georgia State Trade Association of Not-For-Profit Developers (GSTAND), Supportive Housing Subcommittee of the Atlanta Regional Commission on Homelessness, and the Governor's Council on Developmental Disabilities.
- DCA will collaborate with the Regional Commission on Homelessness and the United Way of Metropolitan Atlanta to plan opportunities to end chronic homelessness and to identify best practices to replicate on the local level.

Community & Economic Development

- DCA will attend the Office of Downtown Development workshops offered to local communities to provide an overview of the program requirements for the Business Improvement Districts (BID), Community Improvement Districts (CIDs), and Tax Allocation Districts (TAD).
- DCA will collaborate with Conserve Georgia, a statewide multi-agency, focusing on marketing and educating the public on the conservation efforts throughout the state to preserve natural

resources: energy, land, and water.

- DCA will serve as a member on the OneGeorgia Authority to enhance regional competitiveness by offering grants and loans to create jobs and stimulate new private investment.
- DCA will continue the operation of State Small Business Credit Initiative to support the state's small businesses and manufacturers. These funds are used to provide low-cost capital to small businesses for expansion and improvements

Collaboration with Continuum of Care

- The State will collaborate with the nine Continua of Care and ESG Entitlement communities statewide to establish priorities and facilitate coordinated strategic planning to address homelessness.
- Acting as the collaborative applicant for the Balance of State Continuum of Care, DCA will work to enhance the institutional structure and engage more stakeholders in order to end homelessness for families, unaccompanied youth, veterans, and chronically homeless throughout Georgia.
- DCA will continue to strengthen connections with regional providers, such as Community Action Agencies, with the goal of all counties within the Balance of State CoC having access to homeless services through Coordinated Entry.
- Through the implementation of a Coordinated Assessment System, DCA will be able to assess all persons who are homeless upon entry into the homeless response system. This data will be used to identify systemic barriers that can be addressed through strategic system planning.

Program Specific Requirements

AP-90 Program Specific Requirements – 91.320(k)(1,2,3)

Introduction:

This section provides program-specific requirements for FY18 for HOME, CDBG, ESG, HOPWA, and NHTF.

HOME Investment Partnership Program (HOME)

1. ***A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:***

No forms of investments other than those found in 92.205 will apply to the use of DCA's HOME funds.

2. ***A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:***

DCA will use recapture for home buyer activities where the buyer does not occupy the home for the minimum period of affordability. This is derived from the HOME Program regulations at 92.254(a)(5)(ii)(A) and section 215(b)(3)(B) of the National Affordable Housing Act. DCA follows the option outlined in the regulations to recapture the entire amount of its investment prior to the homebuyer receiving anything.

If the net proceeds of the sale are not sufficient for DCA to recapture the full amount of the Community HOME Investment Program direct subsidy investment, the recapture amount will be limited to the net proceeds. In the event the net proceeds exceed the amount necessary to repay the HOME subsidy, the excess proceeds will go to the homeowner. The DCA recapture policy for these programs is the same for voluntary and involuntary sales.

3. ***A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:***

The HOME-assisted housing must meet the affordability requirements for not less than the applicable period specified in the following table.

Homeownership assistance HOME amount per-unit	Minimum period of affordability in years
Under $15,000	5
$15,000 to $40,000	10
Over $40,000	15

Table 67 – HOME Affordability Requirements

4. ***Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:***

DCA does not intend to use its HOME funds to refinance existing debt secured by multifamily housing rehabilitated with HOME funds.

Community Development Block Grant (CDBG)

The Community Development Block Grant Program (CDBG) provides funding to assist a wide range of eligible activities, including housing improvement projects, public facilities such as water and sewer lines, buildings such as local health centers or head start centers, and economic development projects. All projects must substantially benefit low and moderate income persons or meet another National Objective.

The total funding level is approximately $37 million with approximately $26 million available for the Annual Competition. The maximum amount available per applicant is $750,000 for Single-Activity projects during the annual competition and $1,000,000 for Multi-Activity projects during the annual competition.

Eligible applicants are units of general local government, excluding metropolitan cities, urban counties, and units of government eligible to participate in the urban counties or metropolitan cities programs of the U.S. Department of Housing and Urban Development. Eligible applicants selected for funding will be those having the greatest need as evidenced by poverty and per capita income and whose applications most adequately address the needs of low- and moderate-income persons and have the greatest impact on the needs described.

Categories of planned projects during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	$750,000
The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
The amount of surplus funds from urban renewal settlements	0
The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
The amount of income from float-funded activities	0
Total Program Income	$750,000

Table 68 – CDBG Planned Projects

Other CDBG Requirements

1. The amount of urgent need activities: **$500,000**
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income: **90%**

   Overall Benefit – A consecutive period of one, two, or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. **3 Years**

Emergency Solutions Grant (ESG)

1. Include written standards for providing ESG assistance (may include as attachment)

STREET OUTREACH programs must have standards for targeting and providing essential services related to street outreach.

EMERGENCY SHELTER programs must have: 1) Policies and procedures for admission, diversion, referral, and discharge by emergency shelters, including standards regarding length of stay, if any, and safeguards to meet the safety and shelter needs of special populations, [e.g., victims of domestic violence, dating violence, sexual assault, and stalking; and individuals and families who have the highest barriers to housing and are likely to be homeless the longest]; and 2) policies and procedures for assessing, prioritizing, and reassessing needs for essential services related to emergency shelter

PREVENTION and RAPID RE-HOUSING programs must have policies and procedures for determining and prioritizing homelessness prevention and rapid re-housing assistance; standards for determining what percentage or amount of rent and utility costs, if any, each program participant must pay for assistance; standards for determining how long a particular program participant will be provided with rental assistance and whether and how the amount of that assistance will be adjusted over time, if at all; and standards for determining the type, amount, and duration of housing stabilization and/or relocation services to provide, including the limits, if any, on the homelessness prevention or rapid re-housing assistance that each program participant may receive, such as the maximum amount of assistance, maximum number of months in the program; or the maximum number of times the program participant may receive assistance.

TERMINATION, COMPLAINTS, APPEALS AND CONFIDENTIALITY POLICIES

If a program participant violates program requirements, the grantee may terminate the assistance in accordance with a formal process established by the grantee, and approved by the recipient, that recognizes the rights of individuals affected. The grantee must exercise judgment and examine all extenuating circumstances in determining when violations warrant termination so that a program participant's assistance is terminated only in the most severe cases.

To terminate rental assistance or housing relocation and stabilization services to a program participant, the required formal process, at a minimum, must consist of written notice to the program participant, a review of the decision, in which the program participant is given the opportunity to present their case; and prompt written notice of the final decision to the program participant.

2. If the Continuum of Care has established centralized or coordinated assessment system that meets HUD requirements, describe that centralized or coordinated assessment system.

Current System

There are four Coordinated Entry (CE) implementation sites within the BoS CoC: Bartow, Bibb, Colquitt and Liberty counties. Lead agencies in each community will serve as CES access points for those seeking assistance. Lead agencies will assess and match households to available and appropriate resources in their communities. Resources will be prioritized based on vulnerability (assessment score) and prioritization standards set by the CoC.

Implementation sites will utilize HMIS to assess, prioritize, match and refer. CoC coordinated entry staff will monitor CES success through HMIS.

Areas outside Implementation Communities

DCA funded agencies that are not currently in a community with a CES implementation site are required to assess individuals and families experiencing literal homelessness and prioritize federally funded homeless resources on an agency level. Training dates for assessment and CES in the BoS CoC have been scheduled for February.

The BoS will have a toll-free hotline that anyone in any part of the state can call to be quickly assessed, using the prevention and diversion screening tool, and connected to funded agencies in their area for emergency shelter or housing assistance. CoC staff will be tracking the referrals made by the hotline and ensure that agencies follow up with the individuals or families.

CoC CES staff will be involved in the case conferencing associated with the Unified Referral System and the veteran by-name list currently required for agencies receiving funding from the VA. Case conferencing takes place when service providers meet to evaluate client needs against available resources.

3. Identify the process for making sub-awards and describe how the ESG allocation available to private nonprofit organizations (including community and faith-based organizations).

As noted in AP-30, both HUD and HTF ESG funds are available to nonprofit organizations (including community and faith-based organizations) and local government entities. Local units of government are eligible to apply. To the extent determined under State law by HTF and DCA, private, secular or faith-based nonprofit organizations are also eligible to apply for funds. Nonprofit organizations must demonstrate collaboration with local mainstream service providers and local homeless provider groups. Applicants are expected to participate in continuum of care planning appropriate to the jurisdiction where their activities are located to the satisfaction of those jurisdiction(s).

Criteria for the Written Standards and Policies and Procedures can be found within the 2017 ESG Guidebook, which is available on the DCA website.

While all programs must be provided in a manner that is free from religious influences, it should be noted that the Georgia Constitution allows the State Housing Trust Fund for the Homeless to expend funds "... for programs of purely public charity for the homeless, including programs involving the participation of churches and religious institutions ...".

Under State law, DCA must collect and evaluate organizational and financial information from nonprofit organizations in order to establish the capacity of the nonprofit organization prior to making an award,

and to report funding amounts to the Georgia Department of Audits and Accounts. Current or past DCA grantees must also be in compliance with all DCA programs and grant agreements to apply for and receive funds under this program.

DCA will solicit information about application submission and application development workshops by email from every person on its HTF "contacts" mailing list. Notices will also be emailed to local government representatives, regional commissions, DCA regional representatives, and other groups with local and regional interests. Notice will be published on the DCA website, and all persons receiving notice will be asked to share the notice with others within the state, their region or their community with an interest. Application development workshops will be held in at least four (4) locations around the state.

4. ***If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.***

The homeless participation requirement is not applicable to States.

5. ***Describe performance standards for evaluating ESG.***

ESG programs with different eligible activities will require different assessment standards. DCA's goal is to require sub-recipients to enter additional data elements into HMIS and DCA is diligently working with sub-recipients to ensure a level of data completeness by which an accurate evaluation of program performance can be measured.

*Emergency Shelter program standards:

1. An overall bed utilization rate of 80%
2. The average length of stay of the households served should be no longer than 60 days.
3. An increase in the percentage of discharged households that secure permanent housing at exit by 5% each year.
4. An increase in the percentage of households that increase cash and non-cash income during program enrollment.

Rapid Re-Housing program standards:

1. An increase in the percentage of discharged households that secured permanent housing at program exit by 2% each year.
2. An increase in the percentage of discharged households permanently housed three months after exit.
3. An increase in the percentage of households that increase cash and non-cash income during program enrollment.

Homeless Prevention program standards:

1. An increase in the percentage of discharged households that maintained permanent housing at program exit by 3% each year.
2. An increase in the percentage of discharged households permanently housed three months after exit.
3. An increase in the percentage of households that increase cash and non-cash income during program enrollment.

Street Outreach program standards:

1. An increase in the number of contacts with unduplicated individuals made during outreach.
2. An increase in the percentage of households that access emergency shelter or transitional housing.
3. An increase in the percentage of discharged households that access permanent housing.
4. An increase in the percentage of households that increase cash and non-cash income during program enrollment.

*Programs serving the chronically homeless, or chemically dependent clients, or shelters with minimal barriers to entry may be held to different standards than programs providing other levels of assistance.

Housing Trust Fund (HTF)

1. How will the grantee distribute its HTF funds? Select all that apply:

Georgia was allocated $4,427,950 in the 2017 funding cycle. As permitted by the Interim Rule, up to $442,795 will be used to offset administrative costs. All programmatic funds will be distributed through the following existing DCA program structures:

- DCA Multifamily Grant/Loan Program (includes HOME, NHTF and TCAP funds). Funds are distributed through a request for proposal and are not used in conjunction with the DCA Georgia Housing Tax Credit Program (includes the Federal LIHTC and Georgia State Credit).
- The NHTF allocation will be available for distribution throughout the State. All NHTF funds that Georgia receives will be used to create rental housing affordable for extremely low-income (ELI) households with incomes at or below 30% of Area Median Income (AMI). The NHTF allocation will be distributed directly to owner/developers of affordable housing through Notices of Funding Availability (NOFA), which will also be available through DCA's website (http://www.dca.ga.gov/housing/HousingDevelopment/programs/NationalhousingTrustFund.asp) and additional communication channels. The NHTF funds will be awarded on a competitive basis to eligible Applicants that address the criteria outlined in this allocation plan, the relevant NOFA, and the priority housing needs (Appendix I) as identified in the State's Consolidated Plan and Annual Action Plan. The NHTF will be limited to one award per developer and one award per county in the 2017 funding cycle, unless no feasible alternative exists.

2. If distributing HTF funds through grants to subgrantees, describe the method for distributing HTF funds through grants to subgrantees and how those funds will be made available to state agencies and/or units of general local government. If not distributing funds through grants to subgrantees, enter "N/A".

N/A

3. ***If distributing HTF funds by selecting applications submitted by eligible recipients,***

a. Describe the eligibility requirements for recipients of HTF funds (as defined in 24 CFR § 93.2). If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

Eligible Applicants include for-profit entities, eligible nonprofit entities 501(C) (3) and 501(C) (4), and public entities (such as Public Housing Authorities) that will undertake the eligible activities on behalf of the ELI households. In accordance with the definition at 24 CFR 93.2, eligible Applicants must also:

- Make acceptable assurances to the Grantee (GHFA), that applicant will comply with the requirements of the NHTF program during the entire period that begins upon selection of the applicant to receive NHTF funds and ends upon the conclusion of all NHTF funded activities
- Demonstrate sufficient experience and capacity to develop, own and operate the property for the Period of Affordability.
- Demonstrate it meets experience and capacity requirements required for other federal, state, or local housing programs that may be used in conjunction with NHTF funds to ensure compliance with all applicable requirements and regulations of such programs.

b. Describe the grantee's application requirements for eligible recipients to apply for HTF funds. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

To apply for awards, eligible applicants may submit an Application to DCA at any time after publication of this NOFA. Eligible applicants may not submit more than one Application.

c. Describe the selection criteria that the grantee will use to select applications submitted by eligible recipients. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

To be considered for an allocation of DCA resources, applications must meet each of the Threshold requirements as set forth in the NHTF Allocation Plan. Funds will be awarded to qualified recipients who have met all Threshold Requirements and receive the highest score for the submitted Application based on the priority for funding criteria.

Generally, applications with the highest DCA score and favorable market studies will be allocated resources. Funds will be awarded to qualified recipient who have met the Application Evaluation Requirements that identifies Threshold and Priority for Funding Requirements. This method allows DCA to award funds in rural and urban communities who are committed to creating and preserving affordable housing that target ELI households.

In the event of a tiebreaker DCA will implement the following:

1. Developments in which applicant and/or developer are community-based organizations that shows the ability to demonstrate a local commitment to developing collaborative, holistic solutions in the community in which the proposed development is located.
2. Developments in which applicant and/or developer are a part of a transformational community plan such as Choice Neighborhood or Purpose Built Community.

d. Describe the grantee's required priority for funding based on geographic diversity (as defined by the grantee in the consolidated plan). If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

The Geographic Diversity section of the HTF incentivizes investment in affordable units located near jobs, services, and amenities. The following language is directly from the NOFA:

Geographic Diversity (15 points)

NHTF funds will be available on a statewide basis. Achieving this end requires that the State invest in both improving neighborhoods that already serve low-income residents and providing new housing options in historically less affordable communities that provide residents access to a broad array of jobs, services, and amenities. Resulting from the relatively small amount of NHTF funds available the first year, the State will limit one NHTF award per county in the 2018 funding cycle, unless no feasible alternative exists.

a. Properties that do not fall within a food desert, defined as a low-income census tract where a significant number or share of residents is more than 1 mile (USDA urban) or 10 miles (USDA rural) from the nearest supermarket. ***4 points***
b. Properties near a traditional town square which include an operational anchor institution (e.g. county courthouse, city hall) and which serve as a hub for both commercial activity and community events. ***2 points***
c. Properties near grocery stores with meat, dairy, and produce (high end specialty stores and convenience stores not eligible). ***4 points***
d. Properties near a community or Recreational Center (e.g. YMCA, Boys & Girls Club, Public Pool, Senior Community or Multipurpose Facility). ***2 points***
e. Properties zoned for high performing elementary, middle, or high schools with CCRPI scores of with an average of 72 or above. ***3 points***

Minimum Documentation:

- Site map(s) indicating the specific locations of each activity/characteristic. The map(s) must contain a key stating the type of activities/characteristics identified and their addresses and must include the following:
    - Location of site including an indication of major access roads and site entrance(s)
    - Indication of distances in 1/4 mile increments
    - School District map showing that property is in attendance zone of school.
    - CCRPI report for each school year (2014, 2015, and 2016): http://ccrpi.gadoe.org/2014/ccrpi2014.aspx; http://ccrpi.gadoe.org/2015/ccrpi2015.aspx; http://ccrpi.gadoe.org/2016/ccrpi2016.aspx
    - USDA Food Desert Map https://www.ers.usda.gov/data-products/food-access-research-atlas/go-to-the-atlas.aspx

e. Describe the grantee's required priority for funding based on the applicant's ability to obligate HTF funds and undertake eligible activities in a timely manner. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

HTF Applicants are required to demonstrate their ability to utilize their funds in a timely manner. Please see the following sections of the HTF NOFA:

Obligate funds and undertake eligible activities in a timely manner (20 points)

Applicants must show the ability to obligate NHTF dollars and undertake funded activities in a timely manner through the development team's capacity; project readiness; projected implementation schedule; record of accomplishment for developing projects within a reasonable timeframe; experience with federal affordable housing programs; and history of managing the project (in good standing) throughout the affordability period.

(a) Project team capacity (*10 points*):
- Project team has developed **two (2)** affordable housing developments using federal, state, or local funds. ***2 points***

  OR
- Project team has developed **four (4)** affordable housing developments using federal, state, or local funds. ***4 points***
- Applicant has demonstrated a history of serving tenants that are extremely low-income. ***5 points***
- Applicant has developed at least one development using HOME funds. ***1 point***

(b) Project Readiness (*5 points*):
- Applicant has the ability to show that land being used to develop has been acquired (closed on the acquisition of land). ***5 points***

(c) Compliance History (*5 points*):
- Ability to show that there is no history of outstanding non-compliance for a federally funded development. ***5 points***

Minimum Documents:
- Organizational Chart
- Proposed Project Narrative Form
- Resumes of all principals and key staff involved in the development
- Each project team member must complete a DCA Compliance History Summary (CHS)
- Performance Workbook

f. Describe the grantee's required priority for funding based on the extent to which the rental project has Federal, State, or local project-based rental assistance so that rents are affordable to extremely low-income families. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

DCA prioritizes project-based rental assistance for ELI families. Please see the following language from the NHTF NOFA:

Project-Based Rental Assistance (15 points)

Applicants will be scored based on ability to secure federal, state or local project-based rental assistance so rents are affordable to extremely low-income families at or below 30% AMI for NHTF-assisted units. The type of project-based rental assistance and the length of commitment for the assistance will also be considered. Other mechanisms that ensure affordability for extremely low-income households, such as cross-subsidization or operating assistance reserves, will be considered. The applicant will receive points based on their ability to:

- Documentation must be provided to show that the project-based subsidies will be in place for the term of five (5) years with renewal provision. ***9 points***
- Documentation must be provided to show that the project-based subsidies will be in place for the term of five (10) years with renewal provision. ***12 points***
- Documentation must be provided to show that the project-based subsidies will be in place for the term of five (15) years with renewal provision. ***15 points***

Minimum Documents:

- Applicant must show letter committing PBRA

g. Describe the grantee's required priority for funding based on the financial feasibility of the project beyond the required 30-year period. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

Please see the following language from the NHTF NOFA that describes how DCA prioritizes applicants who are committed to the period of affordability:

Period of Affordability (15 points)

Developments supported by NHTF funds will be required to enter into a restrictive covenant agreement pledging to maintain the units in the program for a 30-year period. Applications that best present operating sustainability for the entire 30-year period will receive points as follows:

- Budget demonstrates positive or breakeven cash flow through year 20. ***5 points***
- Budget demonstrates positive or breakeven cash flow through year 25. ***10 points***
- Budget demonstrates positive or breakeven cash flow through year 30. ***15 points***

Minimum Documentation:

- Applicant must provide a budget demonstrating positive or breakeven cash flow

h. Describe the grantee's required priority for funding based on the merits of the application in meeting the priority housing needs of the grantee (such as housing that is accessible to transit or employment centers, housing that includes green building and sustainable development features, or housing that serves special needs populations). If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

Please see the following section of the NHTF NOFA that demonstrates how DCA incentivizes applicants to address priority housing needs:

Priority Housing Needs (15 points)

Georgia has many cost-burdened renter families that need quality affordable housing. The NHTF is primarily a funding source meant to add NHTF-assisted units to the supply of affordable housing for extremely low-income households. DCA's Consolidated Plan highlights the priority housing need as increasing more affordable housing options across the state by fostering inclusive communities free of barriers to individuals underserved by existing housing programs. As indicated in SP-25, the priority housing needs for extremely low-income renters include:

- Families with children
- Frail Elderly
- Chronic Homelessness
- Severe and Persistent Mental Illness
- Persons with Physical Disabilities
- Persons with Developmental Disabilities
- Persons with Alcohol or Other Addictions
- Veterans
- Persons with HIV/AIDs
- Victims of Domestic Violence

Applicants that identify the group of persons based on the list above that the development will serve and can provide a short explanation as to how this group will be served and what services will be provided will receive full ***15 points*** in this section. Applicants that are not able to show services will only receive a maximum of ***10 points*** in this section. Applicants that are not able to provide a short explanation of the group of persons this development will serve will only receive a maximum of ***5 points***.

In addition, DCA's Supportive Housing Policy reflects HUD's and the DOJ's intent that public entities administer services, programs, and activities in the most integrated setting appropriate to the needs of qualified individuals with disabilities. DCA will not find the new constructions of congregate housing for persons with a disability. To that end, DCA will focus on the creation of affordable, supportive housing options in Integrated Settings. New construction projects must provide housing for persons with a disability in an Integrated Setting. DCA will periodically assess this policy to ensure that the current strategy is consistent with Federal and State policy.

Minimum Documentation:

- Narrative stating how the ELI population will be served
- Applicants must provide a commitment of services

i. Describe the grantee's required priority for funding based on the extent to which the application makes use of non-federal funding sources. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

Please see the following language from the NHTF NOFA that incentivizes applicants to utilize non-federal funding sources in addition to HTF:

Leveraging (20 points):
Given the 30% AMI income targeting requirements, viable developments will likely require additional sources of funding. Funding or assistance provided must be binding and unconditional except as set forth in this section.

Applicants that are able to provide non-federal sources of funding will have a competitive advantage as set forth in the table below. New loans and/or new grants will qualify for points according to the following point scales.

- Amount at least 10% of Total Development Cost (TDC) of ELI units: 20 points
- Amount at least 5% but less than 10% of Total Development Cost (TDC) of ELI units: 15 points
- Amount at least 2% but less than 5% of Total Development Cost (TDC) of ELI units: 10 points

Qualifying Sources: New loans or new grants from the following sources that will provide new capital funding will qualify for points under this category:

a) Community Development Block Grant (CDBG) program funds
b) Federal Home Loan Bank Affordable Housing Program (AHP)
c) HOME/TCAP funds
d) Beltline Grant/Loan
e) Foundation grants that meet the following legal and financial requirements:
   The foundation must be a private foundation as defined in the US Tax Code 26USCA 509 or a community foundation that is accredited by the National Standards for U.S. Community Foundations. Points will only be counted in this section if the foundation is not related to any entity or person in the General Partner or Developer teams and has a history of supplying grants to affordable housing developments.
f) Government grant funds or loans with interest rates below AFR
g) Other non-federal sources approved by DCA

Minimum Documentation:

- Commitment letter for such new loan and/or grant

Does the grantee's application require the applicant to include a description of the eligible activities to be conducted with HTF funds? If not distributing funds by selecting applications submitted by eligible recipients, select "N/A".

N/A

Does the grantee's application require that each eligible recipient certify that housing units assisted with HTF funds will comply with HTF requirements? If not distributing funds by selecting applications submitted by eligible recipients, select "N/A".

The State's HTF application requires that each applicant receiving NHTF fund certify that housing units assisted with NHTF funds comply with NHTF requirements.

Certification of Applicant: The state requires each eligible applicant to certify that housing units assisted with NHTF funds will comply with all NHTF requirements. The certification must include:

- The number of units in a NHTF-assisted project by income group: extremely low-income, very low-income, moderate income and above moderate income.
- A statement declaring that all tenants of a NHTF-assisted development will meet the income limits as required by relevant program guidelines. HUD has released the FY 2017 National Housing Trust Fund (NHTF) Rent Limits and Income Limits (Appendix F & Appendix G), effective July 1, 2017. They are available through the HUD Exchange website (https://www.hudexchange.info/resource/reportmanagement/published/HTF_IncomeLmts_State_GA_2017.pdf and https://www.hudexchange.info

6. Performance Goals and Benchmarks. The grantee has met the requirement to provide for performance goals and benchmarks against which the grantee will measure its progress, consistent with the grantee's goals established under 24 CFR 91.315(b)(2), by including HTF in its housing goals in the housing table on the SP-45 Goals and AP-20 Annual Goals and Objectives screens.

7. Maximum Per-unit Development Subsidy Amount for Housing Assisted with HTF Funds. Enter or attach the grantee's maximum per-unit development subsidy limits for housing assisted with HTF funds.

The limits must be adjusted for the number of bedrooms and the geographic location of the project. The limits must also be reasonable and based on actual costs of developing non-luxury housing in the area.

If the grantee will use existing limits developed for other federal programs such as the Low-income Housing Tax Credit (LIHTC) per unit cost limits, HOME's maximum per-unit subsidy amounts, and/or Public Housing Development Cost Limits (TDCs), it must include a description of how the HTF maximum per-unit development subsidy limits were established or a description of how existing limits developed for another program and being adopted for HTF meet the HTF requirements specified above.

8. Rehabilitation Standards. The grantee must establish rehabilitation standards for all HTF-assisted housing rehabilitation activities that set forth the requirements that the housing must meet upon project completion. The grantee's description of its standards must be in sufficient detail to determine the required rehabilitation work including methods and materials. The standards may refer to applicable codes or they may establish requirements that exceed the minimum requirements of the codes. The grantee must attach its rehabilitation standards below.

In addition, the rehabilitation standards must address each of the following: Health and Safety; Major Systems; Lead-based Paint; Accessibility; Disaster Mitigation (where relevant); State and Local codes,

Ordinances, and Zoning Requirements; Uniform Physical Condition Standards; and Capital Needs Assessments (if applicable).

2017 Georgia National Housing Trust Fund rehabilitation standards address: Georgia State Minimum Standard Codes (with Georgia Amendments), International Building Code, International Energy Conservation Code, International Fire Code, International Fuel Gas Code, International Mechanical Code, International Plumbing Code, International Residential Code, National Electrical Code, HUD Housing Quality Standards (HQS), HUD Minimum Property Standards (MPS), and HUD Uniform Physical Condition Standards (UPCS).The previously mentioned codes address Health and Safety; Major Systems; Lead-based Paint; Accessibility; State and Local codes, Ordinances, and Zoning Requirements; and Uniform Physical Condition Standards. Please see attachment in appendix.

9. Resale or Recapture Guidelines. Below, the grantee must enter (or attach) a description of the guidelines that will be used for resale or recapture of HTF funds when used to assist first-time homebuyers. If the grantee will not use HTF funds to assist first-time homebuyers, enter "N/A".

N/A

10. HTF Affordable Homeownership Limits. If the grantee intends to use HTF funds for homebuyer assistance and does not use the HTF affordable homeownership limits for the area provided by HUD, it must determine 95 percent of the median area purchase price and set forth the information in accordance with §93.305. If the grantee will not use HTF funds to assist first-time homebuyers, enter "N/A".

The grantee has determined its own affordable homeownership limits using the methodology described in § 93.305(a)(2) and the limits are attached.

11. Grantee Limited Beneficiaries or Preferences. Describe how the grantee will limit the beneficiaries or give preferences to a particular segment of the extremely low- or very low-income population to serve unmet needs identified in its consolidated plan or annual action plan. If the grantee will not limit the beneficiaries or give preferences to a particular segment of the extremely low- or very low-income population, enter "N/A."

Any limitation or preference must not violate nondiscrimination requirements in § 93.350, and the grantee must not limit or give preferences to students. The grantee may permit rental housing owners to limit tenants or give a preference in accordance with § 93.303(d)(3) only if such limitation or preference is described in the action plan.

12. Refinancing of Existing Debt. Enter or attach the grantee's refinancing guidelines below. The guidelines describe the conditions under which the grantee will refinance existing debt. The grantee's refinancing guidelines must, at minimum, demonstrate that rehabilitation is the primary eligible activity and ensure that this requirement is met by establishing a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing. If the grantee will not refinance existing debt, enter "N/A."

N/A

Georgia Department of Community Affairs Citizen Participation Plan

This plan may be obtained in alternative languages, upon request. *Se puede obtener este plan en lenguajes diferentes, a pedido.*

Background

The Georgia Citizen Participation Plan (CPP), developed by the Georgia Department of Community Affairs (DCA), contains policies and procedures for public involvement in the Department of Housing and Urban Development's (HUD) Consolidated Plan process in accordance with 24 CFR 91. The following grant programs of the U.S. Department of Housing and Urban Development (HUD) are consolidated into a single planning and application process:

- Community Development Block Grant (CDBG)
- National Housing Trust Fund (NHTF)
- HOME (Affordable Rental and Homeowner Housing Rehabilitation and Development)
- Emergency Solutions Grant (ESG)
- Housing Opportunities for People with AIDS (HOPWA)
- Continuum of Care Program
- Shelter Plus Care (S+C) Program
- HUD Housing Counseling Program
- Neighborhood Stabilization Program (NSP)

This document contains the following information:

- Citizen participation;
- Public information and assistance;
- Public notices, hearings and comment periods;
- Access to information and records;
- Annual Performance Report and Citizen Participation Evaluation;
- Complaint procedures; and
- Amendment procedures.

The Consolidated Plan

The Consolidated Plan is a planning document that addresses identified needs in the areas of housing, homelessness, and community and economic development. The plan specifies programs and resources to be used to provide access to affordable quality housing, a suitable living environment, and expanded economic opportunities.

DCA ensures that the Consolidated Planning process conforms to federal and state regulations regarding citizen participation. DCA encourages public participation in the development and revision of all the included documents (24 CFR § 91.115(a)(2)(i)).

The CPP applies to the following documents that are part of the Consolidated Plan process:

- Consolidated Plan, required every five years;
- Assessment of Fair Housing (AFH), required every five years;
- AFH Revisions, as needed;
- Substantial Amendment to Consolidated Plan, as needed;
- Annual Action Plan, required every year; and
- Consolidated Annual Performance Evaluation Report, required every year.

Public participation is encouraged in the development and revisions of the AFH, Consolidated Plan, Annual Action Plans, and Performance Reports (24 CFR § 91.115(a)(2)(i)).

The Consolidated Plan includes:

- Planning and application information
- Descriptions of the current conditions for housing, living environments, and economic opportunity in the state for low- and moderate-income people;
- Development needs and how grant funds received will address those needs;
- The amount of assistance the state expects to receive from each program;
- Planning and application information;
- The range of activities that may be done;
- Prioritization of the activities to be undertaken;
- Benefits to those who are low to moderate income;
- Plans and assistance to those who might be displaced as a result of any activity funded by these programs; and
- Family income limits determining eligibility, established by HUD on an annual basis and posted at https://www.huduser.gov/portal/datasets/il.html.

Consultation

When preparing the Consolidated Plan or its subsidiary documents, DCA will actively consult with public and private entities that provide housing, health, and social services in order to ensure that the interests and needs of all groups are being adequately addressed. This consultation may occur through regional and interest forums, interviews conducted with such organizations (especially those that provide services to special needs populations and those at risk of homelessness), on-line events, comments received at conferences, and incorporation of data and reports produced by such organizations into the Consolidated Plan and its subsidiary documents.

DCA will actively consult with:

- Public and private agencies that provide assisted housing, including the Georgia Housing Finance Authority administering public housing, the Georgia Balance of State Continuum of Care, and Georgia's Local Continua of Care
    - Any housing agency administering public housing or the Housing Choice Voucher program on a Statewide basis
    - All PHAs that certify consistency with Georgia's Consolidated Plan

- Public and private agencies providing health services
- Public and private agencies providing social services, both general and specialized services for children, elderly persons, persons with disabilities, persons with HIV/AIDS and their families, and homeless persons;
- Local, regional, and/or state-based organizations that represent protected class members
- Local, regional and/or state-based nonprofit, philanthropic, and faith-based organizations serving vulnerable populations, including those at risk of homelessness and members of protected class populations
- Organizations that enforce fair housing laws and are working to affirmatively further fair housing;
    - State fair housing enforcement agencies, including participants in the Fair Housing Assistance Program (FHAP)
    - Fair Housing organizations and nonprofit organizations that receive funding under the Fair Housing Initiative Program (FHIP), and
    - Other public and private fair housing service agencies operating in Georgia.
- Industry, business, and civic organizations and leaders, including housing developers; and
- State, regional, county, and local governmental authorities, departments and leadership;
- Organizations that provide broadband internet service, engage in narrowing the digital divide and promoting digital literacy
- Agencies whose primary responsibilities include the management of flood prone areas, public lands, water resources and emergency management

DCA will maintain and develop distribution lists of those groups and will provide, an opportunity for members of the public and agencies to add contact information (24 CFR § 91.110 (a)).

Citizen Participation

The State of Georgia's Citizen Participation Plan (CPP) outlines the requirements and incentives for public involvement in the process of identifying needs, priorities, and the allocation of HUD funds in Georgia. The objectives of the CPP are to ensure the timely and accessible involvement of the citizens of Georgia, units of local government, public agencies, and other interested parties in the drafting, implementation, and assessment of the Assessment of Fair Housing (AFH), the Five-Year Consolidated Plan (Consolidated Plan) and the Annual Action Plan, any substantial amendments to the Plan, and the Consolidated Annual Performance Evaluation Report (CAPER).

All citizens are encouraged to participate, particularly:

- Persons with disabilities
- Persons living in public housing or utilizing housing vouchers
- Communities of color
- Persons with limited English proficiency (LEP) and non-English-speaking residents
- Persons of low- to moderate-income, particularly those living in slum or blighted areas and areas where CDBG funds are proposed to be used

- Residents of public and assisted housing developments
- Recipients of tenant-based assistance
- All households in areas of slum and blight and/or in areas where CDBG funds are proposed to be used

DCA shall employ communications means designed to reach the broadest audience possible. DCA shall also make a concerted effort to reach those least likely to be served. Meaningful citizen participation is critical to DCA as it creates and implements federally funded programs. These resources represent federal revenue generated by the taxpayers of Georgia. It is through this process that citizens, particularly persons of low- and moderate-income, those living in areas with blight or other disadvantaged conditions, units of local government, and other interested parties express themselves and the needs of their communities to DCA, which administers the funds.

For the purposes of the rule, "community participation" means a solicitation of views and recommendations from members of the community and other interested parties, a consideration of the views and recommendations received, and a process for incorporating such views and recommendations into decisions and outcomes (24 C.F.R. § 5.152).

Reasonable Accommodation

Public hearings will be held in fully-accessible locations in compliance with the Georgia Access Law at (O.C.G.A. §30-3 et seq.) and the Universal Federal Accessibility Standards (UFSA) at accessible hours of the day convenient to the actual and potential beneficiaries of the program.

DCA will make reasonable and consistent efforts to publicize local events, and will provide reasonable accommodation in response to requests received prior to each event. Requests for reasonable accommodation under Section 504 of the Americans with Disabilities Act should be submitted to DCA's 504 Coordinator via email to fairhousing@dca.ga.gov or via mail to:
Georgia Department of Community Affairs
Attn: Section 504 Coordinator
60 Executive Park Drive South, NE,
Atlanta, GA 30329

All public hearings will be held at a time and location convenient to potential and actual beneficiaries in a building that is accessible to persons with physical disabilities in compliance with the Georgia Access Law at (O.C.G.A. §30-3 et seq.) and the Universal Federal Accessibility Standards (UFSA). Accommodations for non-English speaking persons and persons with other disabilities will be provided as necessary with a minimum notification of five working days to ensure a proper response to those needs. If the State is notified that a significant number of non-English speaking persons plan to attend a public hearing, the State will make every effort to have an interpreter available at the hearing.

Language Access Plan

DCA's efforts to engage with the LEP or non-English-speaking residents of Georgia will be governed by its Language Access Plan (LAP) (2016-2021).

In accordance with DCA's LAP, updated January 2017, DCA will include a statement in all meeting notices indicating that 1) DCA is prepared to provide appropriate language services for LEP individuals and 2) requesting that the respondent identify any language services needed within a specified period of time, including which language(s) such services are required.

Notices of public hearings will be translated into Spanish and made available in the other three focus languages (Chinese, Korean, and Vietnamese) upon request or when otherwise required by DCA's LAP. Notices of public hearings will also indicate that interpreters in any one of the four focus languages (Chinese, Korean, Spanish, and Vietnamese) can be made available upon request to attend the public hearings to provide interpretation services to attendees.

DCA will provide interpretation services in a meeting in the following manner:

- If the meeting is small (less than 10 people), telephone interpreter services will be provided.
- If the meeting is medium (11-20 people) or large (21 or more people), an in-person interpreter will be provided upon request.

Groups serving low- and moderate-income people, LEP or non-English-speaking people, or people with disabilities are asked to post or distribute information for their clientele.

Public Comment Process

Prior to the adoption of the Consolidated Plan or any subsidiary document, DCA will make available the draft plan for public review and comment. Availability of the draft documents and the public comment period will be announced via the methods stated in the Notice of the Process section. The Notice will also state the address, e-mail, and phone number to which comments can be submitted.

During the public meeting or hearing, the relevant plan or document will be presented by DCA staff and the public will be encouraged to comment. Supplementary information may also be presented. Comments collected from public meetings and hearings will be included in an appendix of the plan or document and DCA will openly consider all comments. DCA will provide a response to all comments submitted.

During the public comment period, the public is encouraged to examine the available document and submit their comments regarding their concerns, disagreements, preferences, or suggestions. DCA will openly consider any comments from individuals or groups received during the public comment period. A summary of the written and oral comments will be included in the final document, along with the state's response to the comments.

Table 1. Citizen Participation Timelines

Activity/Product	Frequency	Due Date	Citizen Participation Period	Public Hearings (minimum)
Consolidated Plan	Every 5 years	May 15	30 days	2: one prior to publishing draft plan, one during public comment period
Assessment of Fair Housing (AFH)/Analysis of Impediments (AI)	Every 5 years	-	30 days	1
Annual Action Plan	Every year	May 15	30 days	1
Amendments to Consolidated or Annual Action Plan	As needed	--	30 days	1
Consolidated Annual Performance Evaluation Report (CAPER)	Every year	September 30	15 days	--
Amendment to AFH/AI	As needed	--	30 days	--

Consolidated Plan

A public comment period of at least 30 days will be provided prior to the adoption of the Consolidated Plan or implementation of any substantial amendments. DCA staff will prepare a summary of all comments received in writing, and in cases where citizens' views are not accepted, provide reasons for the decision.

Consolidated Annual Performance and Evaluation Reports

Before DCA submits a Consolidated Annual Performance and Evaluation Report (CAPER) to HUD, the proposed CAPER will be made available to those interested for a comment period of no less than 15 days. Citizens will be notified of the CAPER's availability through a notice appearing in at least one newspaper circulated throughout the State.

The CAPER will be available on the DCA website during the 15-day public comment period. Hard copies will be provided upon request.

Any comments from individuals or groups received verbally or in writing will be considered. A summary of the comments, and of the responses, will be included in the final CAPER.

Substantial Amendments

A substantial amendment is defined as a proposed change in a planned or actual activity after the official adoption of the Consolidated Plan that affects 15 percent or more of the State's annual allocation of CDBG, HOME, ESG, or HOPWA funds. A substantial amendment may also be required to carry out an activity not previously described in the action plan.

Substantial amendments to the approved Consolidated Plan will be made public by public notices in newspapers and notices on the DCA website.

DCA will receive and consider comments on substantial amendments to the Consolidated Plan for 30 days before implementing those amendments.

Amendment Procedures
The AFH, Consolidated Plan, and Annual Action Plan are to be amended any time there is a significant change. The following are considered significant amendments (24 CFR § 91.115(c)(1)):

- The elimination of a goal or activity originally described in the plan;
- The addition of a goal or activity not originally described in the plan;
- Change in criteria used to rate and rank applications;
- Significant changes in funds allocated to program components;
- Receipt of any additional federal funds; and/or
- Change in purpose, scope, location, or beneficiaries of activities described in the plan.

Significant changes to the AFH include (24 CFR § 5.164 (a)(1)):

- A material change in circumstances affecting the information on which the AFH is based, to the extent that the analysis, the fair housing contributing factors, or the priorities and goals of the AFH no longer reflect actual circumstances.
- Written notice from HUD specifying a material change that requires the revision.

Substantial Amendment Criteria
Occasionally, public comments or circumstances will warrant an amendment to the Consolidated Plan. The criteria for whether an amendment requires citizen participation is referred to by HUD as Substantial Amendment Criteria. The following conditions are considered to be "Substantial Amendment Criteria":

1. Any change in the described method of distributing funds to local governments or nonprofit organizations to carry out activities.

Elements of a "method of distribution" are:

- Application process for local governments or nonprofits;
- Allocation among funding categories;
- Grant size limits; and
- Selection criteria.

2. An administrative decision to reallocate all the funds allocated to an activity in the Action Plan to other activities of equal or lesser priority need level, unless the decision is a result of:

- A federal government rescission of appropriated funds, or appropriations are so much less than anticipated that the state makes an administrative decision not to fund one or more activities; or
- The governor declares a state of emergency and reallocates funds to address the emergency; or
- A unique economic development opportunity arises where the state administration asks that federal grants be used to take advantage of the opportunity.

The public notification process is the same as the Consolidated Plan, and DCA will employ communications means designed to reach the broadest audience with the following exceptions:

- DCA may decide a public meeting or hearing is not necessary or practical. A public hearing will be scheduled upon request of 20 or more individuals;
- If a public meeting or hearing is held, notification is made in the same way as a Consolidated Plan hearing;
- If a public meeting or hearing is not conducted, notification to the public of the draft amendment and opportunity for public comment will be made through:
    - Paid advertisements in the newspaper(s) with the largest statewide circulation;
    - Press releases sent to state-wide media outlets; or
    - Mail (hard copy or electronic) to all persons who previously indicated interest in the planning process or who are affiliated with a business or organization typically involved with programs covered by the Consolidated Plan;
- The affected program, in cases of amendments of a program-specific nature, will be the responsible entity for the public involvement process. However, in every case, amendment information will be posted on the DCA website;
- A 30-day comment period after the draft plan is complete will be observed. An additional 15-day comment period will be held if significant changes are made as a result of the public process; and/or
- A summary of the comments or views received, and a summary of any comments or views not accepted and the reasons why, will be attached to the substantial amendment of the AFH or Consolidated Plan in accordance with 24 CFR § 91.115 (c)(3).

A minor location change is not a substantial amendment, so long as the purpose, scope and intended beneficiaries remain essentially the same. Capital funds applied to a different portion of a project (i.e. rehabilitation in place of acquisition) do not constitute a substantial amendment.

Citizen Participation in the Event of a Substantial Amendment

In the event of a substantial amendment to the Consolidated Plan, the state will conduct at least one additional public hearing. This hearing will follow a comment period of no less than 30 days, where the proposed substantially amended Consolidated Plan will be made available to interested parties. Citizens

will be informed of the public hearing through newspaper notification prior to the hearing, and the notice will appear in at least one newspaper.

Citizens will be notified of the substantially amended Consolidated Plan's availability through newspaper notification prior to the 30-day substantially amended Consolidated Plan comment period. The notification will appear in at least one newspaper that is circulated throughout the state. The substantially amended sections of the Consolidated Plan will be distributed to the statewide-designated depositories and will be available for the full public comment period. A full list of the depositories where we expect the Consolidated Plan to be available is attached. In addition, the substantially amended sections of the Consolidated Plan will be made available on DCA's website, for the full duration of the public comment period.

Consideration of Public Comments on the Substantially Amended Plan
In the event of substantial amendments to the Consolidated Plan, the state will openly consider any comments on the substantially amended Consolidated Plan from individuals or groups.

Comments must be received in writing, including e-mail, and/or verbally at public hearings. A summary of the written and public hearing comments on the substantial amendments will be included in the final Consolidated Plan. Also included in the final Consolidated Plan will be a summary of all comments not accepted and their reasons for dismissal.

Changes in Federal Funding Level
Any changes in federal funding level after the Consolidated Plan's draft comment period has expired and the resulting effect on the distribution of funds will not be considered an amendment or a substantial amendment.

Public Comment Approaches

Notice of the Process and Public Comment Period
Notification of the Citizen Participation processes for the Consolidated Plan and related processes and plans is distributed through a broad variety of print, electronic, and personal media. Notification is sent out prior to the public comment period onset, and at least two weeks prior to the scheduled hearing dates.

Notification shall consist of one or more, but not be limited to, the following approaches:

- Posting dates, times, and locations on the DCA website
- Publishing legal ads in newspapers with state-wide circulation
- Sending emails via DCA's mass email lists
- Postings on social media accounts, such as Facebook or Twitter
- Sending notifications to local governments, public agencies, participating nonprofits, member organizations, and others throughout Georgia

- Asking groups serving low-moderate income people, non-English speaking people, or people with disabilities to post or distribute information to their clientele
- Sending personal invitation emails to public officials and other interested parties in and around the state.
- Requesting that libraries statewide display physical and electronic copies of the notice
- Requesting that assisted and public housing units statewide display physical and electronic copies of the notice.

Means of Engaging Citizens for Public Comment

Citizen participation will be accomplished through one or more of the following means as appropriate:

1. Citizen Survey
   A survey of housing needs and priorities. This may be conducted by disseminating printed surveys, online, and/or via the telephone. The availability of this survey will be communicated through e-mail and/or mail. Partner organizations will be encouraged to notify low-income clients of its availability.
2. Focus Groups
   One or more focus groups with organizations that advocate for or serve Georgia citizens and/or communities. This may take the form of an in-person meeting, a conference call, or a web meeting.
3. Public Hearings/Forums
   Public hearings will be scheduled at times and locations that are convenient to potential and actual beneficiaries and as required by federal guidelines. Hearing sites will accommodate persons with mobility impairments, and special communication accommodations will be arranged if requested prior to the hearing date. DCA may also schedule an online public hearing via webinar.
4. Interactive Mapping/Charrettes
   DCA may also explore alternative public involvement techniques that encourage a shared vision of change for the community and the review of program performance. This may occur in-person or online.
5. Direct solicitation of input in frequently accessed public spaces
   DCA may direct staff to actively solicit comments and feedback at locations frequently accessed by citizens most likely to be served.

To the greatest extent practicable, DCA will employ electronic means of engaging citizens.

Information to be Presented at Public Meetings

For the public meeting on the Consolidated Plan and the Annual Action Plan, DCA will make available to the public, residents, public agencies and other interested parties:

1. The amount of HUD assistance expected to be received by program(s);
2. The range of activities that can be undertaken including the estimated amount that will benefit persons of low and moderate income;

3. Plans to minimize displacement of persons and assist any persons displaced;
4. Opportunity to identify and discuss barriers to affordable housing and impediments to fair housing choice;
5. An anticipated time schedule for receiving public comments and submission of the Consolidated Plan or Annual Action Plan to the Department of Housing and Urban Development; and
6. The State's Citizen Participation Plan.

For the public meeting on the Assessment of Fair Housing (AFH), DCA will make available to the general public and interested parties:

1. Any HUD-provided data and other supplemental information DCA plans to incorporate into the AFH;
2. The proposed strategies and actions for affirmatively furthering fair housing;
3. A summary of the AFH describing the content and purpose and listing of locations where copies of the entire proposed document may be examined; and
4. A reasonable number of free copies of the AFH provided to residents and groups that request a copy.

Consultation with any housing agency administering public housing or the Housing Choice Voucher program on a Statewide basis, as well as all PHAs that certify consistency with the State's consolidated plan, may additionally consider the following topics: public housing needs; planned programs and activities; the AFH; strategies for affirmatively furthering fair housing; and proposed actions to affirmatively further fair housing. The purpose of this consultation will be to:

1) Provide a better basis for the certification by the authorized official that the PHA plan is consistent with:
   a) the Consolidated Plan and Georgia's description of its strategy for affirmatively furthering fair housing;
   b) the manner in which Georgia will address the needs of public housing;
   c) the manner in which Georgia may provide financial or other assistance to a troubled PHA to improve its operations and remove such designation;
2) Obtain PHA input on addressing fair housing issues in public housing and the Housing Choice Voucher programs;
3) Ensure that activities funded by both Georgia Con Plan program and PHA program are coordinated to achieve comprehensive community development goals and affirmatively further fair housing:
   a) Activities with regard to affirmatively furthering fair housing;
   b) Local drug elimination;
   c) Neighborhood improvement programs;
   d) Resident programs and services.

Additionally, if a PHA is under a VCA, Georgia may consult with PHA to identify actions Georgia may take, if any, to assist PHA in implementing required remedies.

At least two public hearings will be held before the publication of the final Consolidated Plan. The purpose of the first public hearing will be to gather citizen input on housing and community development needs and the proposed Consolidated Plan before it is published for comment. The second public hearing will be held during the Consolidated Plan 30 day public comment period. The purpose of this public hearing will be to gather citizen input on the Consolidated Plan draft. Citizens will be notified of the public hearings at least two weeks before they are held.

Access to information and records

The state shall provide adequate information to citizens, public agencies, and interested parties, as well as reasonable access to records on the proposed and actual use of public funds, including, but not limited to:

- The amount of funds expected to be made available for the coming year, including grants and anticipated program income;
- The range of activities that may be undertaken with those funds;
- Information related to the Assessment of Fair Housing (AFH), including HUD-provided data and other supplemental information, summary information, and purpose and content of the AFH;
- The estimated amount of those funds proposed to be used for activities that will benefit low and moderate-income persons;
- Family income limits determining program eligibility;
- The proposed activities likely to result in displacement and the applicants' plans, consistent with the policies developed under 24 CFR 570.606(b) for minimizing displacement of persons as a result of its proposed activities;
- The types and levels of assistance the applicant plans to make available to persons displaced by funded activities, even if the applicant expects no displacement to occur;
- The method(s) by which interested parties can learn more about the plan and its impacts and make comments or complaints prior to its adoption;
- Copies of the five-year Consolidated Plan, Annual Action Plan and Performance Reports.

The website will be updated with the method of distribution, meeting notices, progress reports, draft plans, annual updates, amendments, performance reports, and other information necessary to provide the pubic with an understanding of the plan, its development, opportunities to comment, and the state's performance in implementing the plan. The public will have an opportunity to easily submit comments. The website will include contact information including phone and email (24 CFR § 91.115(b)(2)).

Digital access to any and all materials will be available; printed materials will be provided upon request. All materials will be provided at no cost. Reasonable efforts will be made, upon request to the agency contact at DCA, for special accommodations and alternative material formats for persons with disabilities and those who are non-English-speaking. (24 CFR § 91.115(a)(4) & (b)(ii)).

DCA will provide citizens, public agencies, and other interested parties with reasonable and timely access to information and records relating to the Consolidated Plan and associated documents, and the use of assistance under the covered programs during the preceding five years. All access to records produced by these activities is subject to the federal Freedom of Information Act (FOIA). To access program information contact: Christy Barnes, Director of Legal Services, 404-679-5291, Christy.Barnes@dca.ga.gov.

Citizen Complaints

DCA will provide a substantive written response to all written citizen complaints related to the Consolidated Plan, Annual Action Plan, Substantial Amendments, and the CAPER within 15 working days of receiving the complaint, or, as applicable, request additional information regarding the complaint if clarification is needed.

As a part of the state CPP, DCA shall inform citizens of the complaint procedure and what constitutes a legitimate complaint. A written complaint or grievance is a formal notification of a concern, allegation, or protest to a proper authority. A formal complaint will be considered filed at the time it is delivered to the appropriate authority's office. The complaint should include the following information:

- Identification of project and project location;
- The reason for the complaint (hearsay and innuendo will not be considered valid);
- Sufficient data to substantiate any claims or charges. If possible, supporting documentation should be included; and
- If desired, citizens may propose a solution or resolution to the problem.

Local Activities

A member of the public with a complaint or grievance regarding a local project that utilized HUD funds shall first file a complaint with an appropriate elected official or local government office. Subgrantees (local governments and nonprofits) shall be required to address the complaint and provide DCA with a copy of the complaint and their response. Subgrantees should attempt to respond within fifteen days where applicable.

Should DCA receive a citizen's complaint regarding a HUD funded project, DCA will only take action if the complaint indicates noncompliance with law or regulation. Other complaints regarding the project should be addressed at the local level. Upon receipt of a complaint, DCA shall transmit a copy of the complaint to the Recipient and request a response within fifteen (15) days. If the response indicates the Recipient is in noncompliance with the law or regulation, DCA shall require corrective action and advise the complainant of its decision. DCA shall respond to written complaints only and then only if evidence indicates that relief has previously been sought at the local level.

State Programs

If the complaint is more appropriately directed toward a state program issue, the same procedure will be followed except all communications will be between the state and the complainant.

Citizen Participation Requirements for Local Governments Receiving Funds from the State
Units of general local government must provide for and encourage citizen participation as prescribed in 24 CFR 570.486. All applicants for HUD funds are required to adhere to the requirements in this CPP as applicable. In addition, local governments and agencies/organizations that apply for and utilize specific funding programs must adhere to the stipulations in Table 2 below.

Table 2: Requirements for Local Governments

Program	Public Hearing	Public Notification Minimum	Other
CDBG	3	5 days	N/A
HOME			CHDOS must have and implement Team Participation Plan

Citizen Participation Requirements for Local Governments Participating in the CDBG Program
To ensure applicant and subrecipient compliance with Section 508 of the Housing and Community Development Act of 1974, as amended, the citizen participation requirements for units of general local governments applying for or receiving CDBG funds from the State are as follows:

Each applicant shall provide citizens with adequate opportunity to participate in the planning, implementation, and assessment of the CDBG program. The applicant shall provide adequate information to citizens, hold a minimum of one public hearing at the initial stage of the planning process to obtain views and proposals of citizens, and provide opportunity to comment on the applicant's previous community development performance.

All units of local government that apply for and/or receive CDBG funds must adhere to the DCA Citizen Participation Plan outlined in the Community Development Block Grant Applicant and Recipient Manuals which:

1. Provides for and encourages citizen participation, with particular emphasis on participation by persons of low and moderate income who are residents of slum and blighted areas and of areas in which funds are proposed to be used;
2. Provides citizens with reasonable and timely access to local meetings, information, and records relating to the State's proposed method of distribution, as required by regulations of the Secretary, and relating to the actual use of funds under Title I of the Housing and Community Development Act of 1974, as amended, and the unit of local government's proposed and actual use of CDBG funds;
3. Provides for technical assistance to groups representative of persons of low and moderate income that request such assistance in developing proposals with the level and type of assistance to be determined by the grantee;
4. Provides for public hearings to obtain citizen views and to respond to proposals and questions at all stages of the community development program, including at least the development of needs, the review of proposed activities, and review of program performance, which hearings shall be

held after adequate notice, at times and locations convenient to potential or actual beneficiaries, and with accommodations for the disabled;

5. Provides for a timely written answer to written complaints and grievances, within 15 working days where practicable;
6. Identifies how the needs of non-English speaking residents will be met in the case of public hearings where a significant number of non-English speaking residents can be reasonably expected to participate;

The plan must be made available to the public at the beginning of the planning stage, i.e., the first public hearing. The plan must include procedures that meet the following requirements: Scheduling and Providing Notices of Public Hearings - In order to provide adequate notice of all public hearings, a minimum of five calendar days' notice shall be given. The hearing may be convened on the seventh day excluding the date the notice was published. The applicant must provide citizens with reasonable and timely access to all hearings. The location and time of these hearings must be scheduled in such a manner as to be convenient to potential or actual beneficiaries.

Additionally, all notices for public hearings shall state that accommodations for persons with disabilities will be provided.

A public hearing must be scheduled as early as possible in the planning process to ensure adequate public participation and still have time to develop an application. Citizens, with particular emphasis on persons of low and moderate income, and those who are residents of slum and blighted areas, will be encouraged to submit their views and proposals regarding community development and housing needs.

Citizens must be provided with the following information at the public hearing prior to application submittal to the state, and these items must be included in the **first** public notice as items to be discussed at the hearing:

1. The amount of funds available for proposed community development and housing needs;
2. The range of activities that may be undertaken, including the estimated amount proposed to be used for activities that will benefit persons of low and moderate income;
3. The plans of the applicant for minimizing displacement of persons as a result of activities assisted with such funds and the benefits to be provided to persons actually displaced as a result of such activities;
4. If applicable, the applicant must provide citizens with information regarding the applicant's performance in prior CDBG programs funded by the State.

Written minutes of the hearing and an attendance roster must be kept for review by State officials. Nothing in these requirements shall be construed to restrict the responsibility and authority of the applicant for the development of the application.

If awarded, a **second** public hearing regarding the content of the award must be published. This notice must be published in the same manner as the first public notice, and must inform citizens of the

proposed objectives, approved activities, the location of the approved activities, and the amount of funds to be used for each activity. Citizens must be given the opportunity to submit comments on the awarded project. The notice must provide the location at which, and hours when, the application is available for review.

Applicants must submit a notarized proof or other acceptable proof of publication of each public notice with the application.

Technical Assistance - The applicant must provide technical assistance to facilitate citizen participation where requested, particularly to groups representative of persons of low to moderate income. The level and type of technical assistance shall be determined by the applicant/recipient based upon the specific need of the community's citizens.

Amendments - The recipient must involve citizens in substantial amendments to the Community Development program. This shall be done by means of a public hearing prior to the submittal of the request for a program amendment to the State.

Complaint Procedures - Each applicant/recipient is subject to the State Citizen Participation Plan. All written citizen complaints which identify deficiencies relative to the applicant/recipient's community development program will merit careful and prompt consideration by the applicant/recipient. All good faith attempts will be made to satisfactorily resolve the complaints at the local level. Complaints must be filed with the Chief Elected Official who will investigate and review the complaint. A written response from the Chief Elected Official to the complainant will be made within fifteen working days, where practicable.

Should DCA receive a citizen's complaint regarding a Recipient's CDBG project, DCA will only take action if the complaint indicates noncompliance with law or regulation. Other complaints regarding the project should be addressed at the local level. Upon receipt of complaint, DCA shall transmit a copy of the complaint to the Recipient and request a response within fifteen (15) days. If the response indicates the Recipient is in noncompliance with law or regulation, DCA shall require corrective action and advise the complainant of its decision. DCA shall respond to written complaints only and then only if evidence indicates that relief has previously been sought at the local level.

All citizen complaints relative to Fair Housing/Equal Opportunity violations involving discrimination will be forwarded to the following address for disposition: Christy Barnes, Director of Legal Services, 404-679-5291, Christy.Barnes@dca.ga.gov.

The Plan must also state that persons wishing to object to approval of an CDBG application by the State may make such objection known to DCA in writing. The State will consider objections made only on the following grounds:

1. The applicant's description of needs and objectives is plainly inconsistent with available facts and data;

2. The activities to be undertaken are plainly inappropriate to meeting the needs and objectives identified by the applicant; and
3. The application does not comply with the requirements set forth in the Consolidated Plan or Consolidated Annual Action Plan or other applicable laws.

Such objections should include identification of the requirements not met and, in the case of objections relative to item 1 on the previous page, supporting data.

Performance Hearings - Prior to close-out of the Community Development Block Grant Award, the recipient must hold a public hearing to obtain citizen views and to respond to questions relative to the recipient's performance. This hearing shall be held after notice as described for the first and second public hearing notice, at times and locations convenient to actual beneficiaries, and with accommodations for the disabled and non-English speaking persons provided.

Documentation must be kept at the local level to support compliance with these requirements.

Appendix

Summary of Past Performance from 2016 CAPER
(For ES-05 Executive Summary)

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Buildings	Non-Housing Community Development	CDBG: $	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	25000	81573	326.29%	5000	2640	52.80%
CHDO Operating Assistance	Capacity Building	HOME: $	Other	Other	2	0	0.00%	1	0	0.00%
CHDO Pre-development Loans	Affordable Housing	HOME: $	Other	Other	3	0	0.00%	1	0	0.00%
Construction/Rehabilitation of Rental Units	Affordable Housing	HOME: $ / National Housing Trust Fund: $3318674	Rental units constructed	Household Housing Unit	1800	2455	136.39%	510	869	170.39%
Construction/Rehabilitation of Rental Units	Affordable Housing	HOME: $ / National Housing Trust Fund: $3318674	Rental units rehabilitated	Household Housing Unit	100	0	0.00%	100	90	90.00%
Economic Development	Non-Housing Community Development	CDBG: $	Jobs created/retained	Jobs	4000	2026	50.65%	490	223	45.51%
Emergency Shelter & Transitional Housing	Homeless	ESG: $	Homeless Person Overnight Shelter	Persons Assisted	80000	49213	61.52%	16000	7708	48.18%
Homeless Outreach Assistance	Homeless	ESG: $	Other	Other	3375	2641	78.25%	675	430	63.70%
Homeless Prevention Assistance	Non-Homeless Special Needs	ESG: $	Homelessness Prevention	Persons Assisted	2500	3441	137.64%	500	840	168.00%
Homeownership Assistance	Affordable Housing	CDBG: $ / HOME: $	Homeowner Housing Added	Household Housing Unit	29	16	55.17%	10	0	0.00%

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Homeownership Assistance	Affordable Housing	CDBG: $ / HOME: $	Homeowner Housing Rehabilitated	Household Housing Unit	490	332	67.76%	105	73	69.52%
Homeownership Assistance	Affordable Housing	CDBG: $ / HOME: $	Direct Financial Assistance to Homebuyers	Households Assisted	400	312	78.00%	51	16	31.37%
HOPWA Housing Assistance	Non-Homeless Special Needs	HOPWA: $	Tenant-based rental assistance / Rapid Rehousing	Households Assisted						
HOPWA Housing Assistance	Non-Homeless Special Needs	HOPWA: $	HIV/AIDS Housing Operations	Household Housing Unit	2300	1576	68.52%	460	346	75.22%
HOPWA Tenant-based Rental Assistance	Non-Homeless Special Needs	HOPWA: $	Tenant-based rental assistance / Rapid Rehousing	Households Assisted	600	639	106.50%	120	176	146.67%
Immediate Threat and Danger Program	Non-Housing Community Development	CDBG: $	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	25000	13951	55.80%	5000	2076	41.52%
Infrastructure	Non-Housing Community Development	CDBG: $	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	45000	59584	132.41%	9000	12240	136.00%
Rapid Re-housing Assistance	Homeless	ESG: $	Tenant-based rental assistance / Rapid Rehousing	Households Assisted	4365	3830	87.74%	873	1250	143.18%
Redevelopment	Non-Housing Community Development	CDBG: $	Jobs created/retained	Jobs	450	134	29.78%	128	0	0.00%
Tenant-based Rental Assistance	Affordable Housing	HOME: $	Tenant-based rental assistance / Rapid Rehousing	Households Assisted	7	7	100.00%			

OMB Control No: 2506-0117 (exp. 07/31/2015)

Housing Trust Fund Rehabilitation Standards

(For AP-90)

Georgia's National Housing Trust Fund Allocation Plan

National Housing Trust Fund Rehabilitation Standards

INTRODUCTION

The purpose of this National Housing Trust Fund Rehabilitation Guide is designed to outline the requirements for building rehabilitation for all rental housing developments under the National Housing Trust Fund Program (single-family or multi-family) or other funding sources, which consist of HOME and Low –Income Housing Tax Credit (LIHTC). The goal of this Rehabilitation Guide is to standardize DCA's expectations for the longevity and marketability of completed rehabilitation of existing rental property. This Guide is also intended to provide the owner/applicant with guidance and requirements for the DCA rehabilitation process. The requirement mentioned in this Guide meets the minimum NHTF requirements as outlined in the HUD requirements for NHTF Rehabilitation standards, additional Guides can be found in the Appendix of this document.

In accordance with federal requirements established by 24 CFR 92.25 (HOME), IRS Section 42 (LIHTC), and the 1989 Georgia General Assembly Housing Trust Fund (HTF) for the Homeless and 24 CFR 91 and 93, the National Housing Trust Fund (NHTF), the Georgia Department of Community Affairs (DCA) has established these Architectural Standards. All projects receiving DCA resources for the construction of new and/or rehabilitation of existing rental housing, including HOME, 9% LIHTC, 4% LIHTC/Bonds, and/or National Housing Trust Fund (NHTF), must meet these Architectural Standards. It is the Project Team's responsibility to ensure 100% compliance with this Manual (and approved DCA Architectural Waivers).

The use of National Housing Trust Fund dollars requires that projects funded under this program meet applicable Federal, State, and DCA codes, acts, and regulations. These architectural standards are not meant to replace Federal, State or local codes. These standards shall be in addition to the following that are applicable to all properties funded in the program:

I. Georgia State Minimum Standard Codes (with Georgia Amendments)
II. International Building Code
III. International Energy Conservation Code
IV. International Fire Code
V. International Fuel Gas Code
VI. International Mechanical Code
VII. International Plumbing Code
VIII. International Residential Code
IX. National Electrical Code
X. HUD Housing Quality Standards (HQS)
XI. HUD Minimum Property Standards (MPS)
XII. HUD Uniform Physical Condition Standards (UPCS).

The use of NHTF funds to be funded under this Plan must meet all applicable federal and state accessibility standards as well as all DCA accessibility requirements. For further information on the accessibility laws and requirements that are applicable to projects funded under the Plan, refer to the DCA Accessibility Manual, found in *Appendix A* of this document.

By some measures, DCA architectural and accessibility requirements will exceed the referenced state and federal requirements.

All new and rehabilitation construction work scopes must give consideration to the property marketability and residential quality of life which includes, but is not limited to, upgraded building exteriors and unit interiors, and improved site conditions and amenities

DCA may determine that projects which exceed customary and reasonable construction costs, even if they are within published per unit cost limits, represent a poor utilization of resources and may fail Threshold.

Final determination of compliance with the Architectural Standards rests solely with the mortgage lender, the credit enhancement provider, and the Georgia Department of Community Affairs.

A **Pre-construction Conference** will be scheduled prior to project commencement to review federal compliance requirements and draw request procedures.
An onsite **OAC Meeting** will be scheduled during the last week of each month. The DCA Construction Project Manager will be notified via email of monthly OAC meeting dates and times. DCA staff may not attend all onsite OAC meetings.
The Internal Revenue Code requires that all low-income units in a project receiving Credits remain rent-restricted and income-restricted for the 15-year Compliance Period and for 15 years after the close of the Compliance Period for tax credit projects. The requirements for HOME projects are 20 years. The National Housing Trust requirements are for 30 years. Projects that propose rehabilitation must present a scope of work that will position the property to meet the entire extent of its statutory obligations. The Fannie Mae Expected Useful Life Tables should be used as a guide to determine the components and systems that need to be replaced in order to meet the duration of all tax credit program obligations. It is expected that all work scopes will propose:

- A minimum "dwelling unit" per unit hard cost budget of $25,000, excluding the construction of new community buildings and community building additions. The costs of furniture, fixtures, new community buildings, and common use amenities are not included in the minimum amount.
- A substantial gut rehabilitation (where applicable) where major systems are removed and replaced according to the Fannie Mae Expected Useful Life Table.
- The replacement of existing exterior stairs, breezeways, and handrails that have no roof cover with covered vertical circulation.

Compliance with the Georgia State Minimum Standard Codes and Life Safety Code for new construction regarding stairs, handrails, guardrails, smoke detectors, fire alarms, and unit fire separation (attic draft stops, fire separation, rated party walls and floor/ceiling components, and caulking of all penetrations in the fire assemblies). Life Safety items that do not meet current codes will not be 'grandfathered'.

- Materially the same scope of work in all units
- Compliance with the Architectural Manual upon completion of work
- Compliance with all current building codes upon completion of work
- Compliance with all DCA accessibility requirements upon completion of work
- Compliance with UPCS upon completion of work, subject to inspection

DCA will review the type of construction and associated hard construction costs. Applications for the rehabilitation of a substandard property will not be funded if, in the opinion of DCA, the rehabilitation will not result in improved, safe and decent long-term housing, the proposed rehabilitation does not meet DCA

standards, or if new construction would be more appropriate.

DCA reserves the right, to perform its own Physical Needs Assessment (PNA) or decline any application for rehabilitation if it is determined that the Rehabilitation Work Scope:

- Is inadequate or excessive;
- Does not address the issues of the Physical Needs Assessment;
- Does not address major structural issues, building codes, health, safety, marketing or any other conditions observed on the site;
- Will not result in safe, decent housing;

All provisions in the Architectural Standards, Submittal, Accessibility, and Amenities Manuals apply to rehabilitation properties. However, DCA may consider waivers for some following requirements if it can be documented that compliance will be cost prohibitive. The burden of proof is on the owner/applicant. Waivers may be requested for:

- Architectural Standards:
- Central HVAC in a multi-floor building where it can be demonstrated that the existing central system is most efficient and economical system for conditioning the indoor space
- Flat roofs
- Room and unit size, closet and cabinet/counter requirements, number of bathrooms only if documentation of the marketability of existing conditions is provided
- One bedroom units where the bathroom is accessed through the bedroom

Threshold Section, Required Amenities: Additional Requirements and Amenities for senior projects that requires Fair Housing compliance on all units built BEFORE 1991 only if clear documentation of the burdensome cost to provide accessibility to all units is provided.

Above per unit rehabilitation amount only if there is an overriding public policy or historic preservation need and the physical needs assessment clearly documents that the existing property does not require a comprehensive rehabilitation. A certification from the architect must also be provided documenting that the proposed work scope is sufficient to ensure that the completed project will be viable and meet DCA useful life requirements. The useful life requirements for each major system can be found in the useful life table for Fannie Mae. For multifamily family housing with 26 or more total units, the useful life of systems must be determined through this needs assessment that determines the work to be performed and identifies the needs of the project. If the remaining useful life of one or more major system is less than the applicable period of affordability for any LIHTC or HUD Funded program, the applicant must establish a replacement reserve with adequate monthly payments to either repair or replace the system identified in the assessment. DCA may require as a condition of the waiver, that the financial pro forma clearly provide for the full funding of the Capital Replacement Reserve.

The Capital Replacement Reserve study must clearly schedule all component/system replacements required by the Fannie Mae Expected Useful Life Table and the UPCS as described in 24 CFR 5.703.

DCA reserves the right to deny waivers if the completed rehabilitation will not result in safe and decent housing that is equal to comparable housing in the marketplace. In no case will DCA waive federal, state or local building or accessibility laws or codes, state energy conservation codes or health and safety

requirements.

No waivers will be allowed for the rehabilitation of existing units with room layouts that do not meet architectural standards requirements for bathrooms that open from areas of food preparation, or be used as a sole passageway to a habitable room, hall, basement or to the exterior or for habitable rooms in basement or cellar spaces unless egress is provided according to applicable fire codes.

The application for funding shall include a Physical Needs Assessment and comprehensive Rehabilitation Work Scope outlined below. Rehabilitation projects selected for funding must submit all pre-construction due diligence documentation outlined in the Architectural Submittals Instructions, including a complete set of plans and specifications produced by an architect licensed in the state of Georgia. The DCA Rehabilitation Work Scope form submitted at application may not be changed between application submittal and Final Allocation without DCA's consent. All work proposed must be completed.

PHYSICAL NEEDS ASSESSMENTS

The Physical Needs Assessment (PNA) is required at Application for all rehabilitation, adaptive reuse, and Historic Preservation properties applications presented for potential funding by programs administered through the DCA Office of Affordable Housing. The purpose of the PNA is to provide a property description, document the existing condition of the property, to identify existing building code and program violations, identify immediate physical needs and to estimate capital needs over the long-term. The PNA, including an on-site investigation, narrative report, and Fannie Mae forms must be conducted by a DCA Qualified Consultant. Refer to DCA's 2017 Funding Round website for a list of qualified consultants.

The PNA must be no more than 6 (six) months old at the time the Application is submitted. The report must include a signed statement from the Consultant with the following language inserted in the Consultant's signature block: "The investigation has been completed in accordance with DCA requirements, is accurate, and can be relied upon by DCA as a true evaluation of the existing property conditions." DCA reserves the right to verify all information contained in the report with an on-site inspection of the property conducted during the application process.

The Consultant shall inspect:

- All vacant and down units
- At least 10% of the occupied units
- One units in each building
- One of each type of the accessible units (where they exist);
- One of each unit configuration type; and
- All other community/common areas and maintenance spaces.

The report is not expected to identify regular maintenance items that are part of the property owner's operating responsibility such as occasional window glazing replacement and/or caulking, minor plumbing repairs, annual HVAC and appliance servicing. However, the Consultant must comment on such items if they do not appear to be routinely addressed or in need of immediate repair, as well as report any observed or documented building code violations.

The Physical Needs Assessment must include descriptions of the condition of the following items and identification of the Remaining Useful Life in the Fannie Mae forms format of the following items:

SITE SYSTEMS AND CONDITIONS

- Landscaping
- Irrigation
- Grading/storm water drainage
- Lighting - building mounted
- Lighting - pole mounted
- Parking
- Pedestrian paving (sidewalks)
- Utilities (piping & equipment such as pumps etc.)
    - Water
    - Fire
    - Gas
    - Electrical
    - Sanitary
    - Storm water drainage structures & piping
    - Cable/Phone/Communications
- Mailboxes
- Property sign
- Traffic signage
- Retaining walls
- Fencing
- Exterior stairs
- Exterior railings
- Site amenities

COMMON AREAS/COMMUNITY BUILDING

- Common area amenities
- Common area doors
    - Interior
    - Exterior
- Common area floors
- Common area ceilings
- Common area walls
- Common area kitchens
    - Countertop
    - Cabinets
    - Sink
    - Appliances
- Common area HVAC
    - Ductwork
    - Equipment

- Common area/public bathrooms
    - Bath fans & ventilation
    - Fixtures
    - Hot water heating
    - Water piping
    - Waste/vent piping
    - Bathroom accessories
- Sprinklers
- Electrical
    - Light fixtures
    - Outlets/switches
    - Wiring
    - Equipment (panels/breakers)
- Life safety
    - Smoke alarms
    - Fire alarm system

BUILDING ARCHITECTURE

- Foundations
- Crawl Spaces/Basements
- Framing
    - Wall
    - Floor
    - Ceiling/roof
- Exterior wall sheathing
- Exterior cladding
- Roof sheathing
- Roofing
- Gutters & downspouts
- Soffits
- Windows
- Insulation
    - Wall
    - Floor
    - Attic

DWELLING UNITS

- Cabinets
- Countertops
- Interior doors
- Exterior doors

- Floor underlayment
- Floor finishes
- Interior wall sheathing (gypsum wall board)
- Wall finishes
- Ceilings
- Bathroom vanities
- Bathtubs/showers
- Tub/shower surrounds
- HVAC
    - Ductwork
    - Equipment
    - Bath fans & ventilation
- Plumbing
    - Fixtures (faucets, shower valves, toilets, sinks)
    - Hot water heating
    - Water piping
    - Waste/vent piping
    - Wall
    - Under slab
- Appliances
- Elevators
- Sprinklers
- Electrical
    - Light fixtures
    - Outlets/switches
    - Wiring
    - Equipment (panels/breakers)
- Life safety
    - Smoke alarms
    - Fire alarm system
- Attic draft stop/fire walls

The PNA must also include a discussion of known building code and health/life safety violations. The PNA consultant is not expected to assume liability for compliance with accessibility regulations during design of post-rehabilitation. The consultant is expected to identify potentially costly barriers to required property accessibility, i.e., changes in grade for accessible routes or parking and unit framing changes for required clearances. Through completion of the Accessibility Checklists, the PNA must identify major violations of The Americans with Disabilities Act, The Fair Housing Act, and The Uniform Federal Accessibility Standards where these standards are applicable to the existing property. The Uniform Federal Accessibility Standard is applicable to all properties either as a federal requirement through the use of federal funds or as a DCA program specific state requirement through the use of tax credits.

The Capital Replacement Reserve study shall extend for 20 years with no capital replacements within the first five years (apart from regular maintenance and turnkey operations that are part of the operation and management of the property). The Capital Replacement Reserve shall reflect the condition of the property "As Improved". That is, the Capital Replacement Reserve study must take into consideration the entire Rehabilitation Work Scope proposed by the Owner, not just the needs identified by the Physical Needs consultant. The Capital Replacement Reserve study shall be a true and accurate representation of the needs of the property once the proposed rehabilitation is completed.

Any item that is determined to have an Effective Remaining Life of 15 years or less must be replaced as part of the work scope. Where major systems (such as roofing) have been replaced within the last 5 years, DCA may allow for replacement in the 15 year term if the cost is clearly documented in the Capital Replacement Reserve study and the project underwriting proposes full funding of the Reserve. It is recognized that the Expected Useful Life Tables represents one judgment of the expected life of the various components. The Tables provide a useful and consistent standard for all evaluators to use. The Tables avoid debate on what the appropriate expected life is and permit focus on the evaluator's judgment of the effective remaining life of the actual component.

It is incumbent upon the project team to provide adequate documentation substantiating the differences between the Effective Remaining Life as a calculated difference between Effective Useful Life and Age and the Evaluator's opinion of the remaining useful life.

The report should emphasize all systems/components with no Effective Remaining Life and those with Effective Remaining Life less than DCA requirements, all deferred maintenance, and repairs or replacements involving significant expense or outside contracting. The Consultant must note any suspected environmental hazards seen in the course of the inspection. Confirmation of suspected environment-related hazards, such as mold, lead-based paint, or asbestos containing materials, will be addressed in a separate environmental engineer's report.

THE DCA REHABILITATION WORK SCOPE FORM

Whereas the PNA documents the existing conditions and immediate physical needs, the DCA Rehabilitation Work Scope form must include these considerations as well as future property marketability, durability, and energy efficiency that will add to the residential quality of life. The DCA Rehabilitation Work Scope form must be compiled by the Applicant/Owner, Architect/ Engineer, and Construction Contractor in DCA's required format to include materials, quantities and unit costs. The DCA Rehabilitation Work Scope form shall be based on:

- Requirements for the replacement of components with no Effective Remaining Life at the end of 15 years, building code and health/safety violations, and immediate needs from the Physical Needs Assessment;
- Requirements for the replacement of components in order to comply with DCA's Architectural Standards and Specific Systems Replacement Guidance below;
- All applicable Threshold and Scoring upgrades as indicated in the DCA Application including amenities construction;
- All costs that will be incurred in bringing the property into compliance with federal, state, local,

and DCA accessibility regulations (see the DCA Accessibility Manual *(Appendix B)* for further guidance);

- Remediation of all issues identified in the Phase I and II environmental reports.

DCA must be able to determine that all major issues identified in the PNA and Environmental Reports are addressed in the DCA Rehabilitation Work Scope form.

SPECIFIC SYSTEMS REPLACEMENT GUIDANCE

Site Utilities

The DCA Rehabilitation Work Scope form must contain a budget line item to investigate and repair or replace all main utility lines on the property, regardless of age. If more than 50% of the lines sanitary sewer, storm sewer, water service, fire service, electrical, cable, or gas are identified as failed, the entire line must be replaced. Failure to adequately substantiate the condition of existing utility lines may result in DCA re-capturing credits for failure to confirm the utilities systems operational conditions. If funded, a copy of the sewer investigation must be submitted to DCA with the final inspection documentation.

Site Utilities – Special Considerations: Polybutylene Piping

In all cases where polybutylene piping is identified on the property, an investigation must be conducted to adequately confirm the condition and performance of the plumbing system. The Consultant must document the investigation and provide an opinion on the system and whether or not the piping should be repaired or replaced. Particular note must be made of the condition of the fittings, and in all cases the last 3'-0" of the hot water lines from the water heater must be replaced with copper piping if this is identified as polybutylene piping.

Landscaping/Storm Water Drainage/Erosion

All areas of washout, exposed dirt, dead trees and overgrown landscaping must be corrected. Details must be provided in the DCA Rehabilitation Work Scope form as to how this will be accomplished. If DCA determines erosion conditions are severe, DCA may require, as a condition of funding, that a civil engineer be engaged to address the issue.

Site Improvements

Broken or un-useable amenities equipment, non-compliant site stairs and handrails, failed/deteriorated sidewalks, paving, and retaining walls must be corrected. Sidewalks and paving in particular must meet the minimum standards set forth in UPCS. All deficient paving and sidewalks are expected to be altered for compliance with federal and DCA accessibility requirements.

Foundations

All cracking or settling of concrete foundations and masonry must be addressed. If DCA determines foundation conditions are severely deteriorated, DCA may require, as a condition of funding, that a structural engineer be engaged to address the issue.

Crawlspaces

All crawlspaces must be investigated and assessed for the presence of mold, plumbing leaks, and deteriorating structures. All crawl spaces must meet minimum energy and fire code requirements.

Rough Carpentry

Deteriorated subfloor, wall sheathing, roof sheathing, and structural framing must be addressed and allowances for the quantity of this work must be substantiated.

EIFS & Stucco

EIFS may not be repaired but must be replaced by a DCA-approved material. Hard-coat stucco must be replaced if more than 25% of the existing material has failed. DCA must approve any repair or replacement of hard-coat stucco.

Acoustical Isolation

The DCA Rehabilitation Work Scope form must meet the Architectural Standards for acoustical isolation wherever party and exterior wall structures, ceiling, and floor construction are exposed during the course of construction.

Drywall

The DCA Rehabilitation Work Scope form must indicate the approximate percentage of drywall to be removed and replaced (i.e. Is this a gut removal of all drywall or small scale patching as required to address isolated leaks or penetrations into walls by other trades). Allowances must be substantiated.

HVAC

Heating, ventilating, and air conditioning systems must be replaced if they do not meet the requirements of applicable building codes, do not meet Threshold Section Building Sustainability, or do not have the required Effective Remaining Life. The duct system must be replaced as required to meet applicable codes and DCA required life expectancy. If ductwork is not replaced, it must be cleaned and sealed in accordance with the Georgia State Minimum Standard Energy Code.

Fire and Life Safety

Through strict code compliance, the property design shall provide a safe environment for all tenants. Compliance with the Life Safety Code for new construction is required for the following regardless of local building authority enforcement: stairs, handrails, guardrails, smoke detectors, carbon monoxide detectors, fire alarms, and unit fire separation (attic draft stops, fire/smoke separations, rated party walls and floor/ceiling components, and caulking of all penetrations in the fire assemblies). Life Safety items that do not meet current codes will not be 'grandfathered' in. Adherence to the most recently adopted editions of the *Georgia State Minimum Standard Codes (with Georgia Amendments)* is required. This includes but is not limited to:

- Smoke detectors must be hard-wired and located per code for all construction, either rehabilitation or new. DCA will not waive this requirement for rehabilitation proposals. Carbon Monoxide Detectors shall be in accordance with NFPA 101 Life Safety Code and NFPA 720.
- Fire alarms and sprinklers must meet fire department, state and local code requirements.
- Attics must be constructed or rebuilt to meet all current fire and life safety codes, **regardless of the requirements of the local building authority**. These include draft stop walls, and rated ceiling, floor, and wall assemblies.
- All through-penetrations of smoke walls, draft stops, and rated assemblies must meet current fire codes.

- Projects shall comply with all disaster mitigation-related requirements of the latest editions of the applicable mandatory State Minimum Standards as adopted and amended by the Department of community Affairs, and with all local ordinances regarding disaster mitigation.

HISTORIC REHABILITATION

Rehabilitation

Rehabilitation is defined by the Secretary of the Interior as "the process of returning a property to a state of utility, through repair or alteration, which makes possible an efficient contemporary use while preserving those portions and features of the property which are significant to its historic, architectural, and cultural values." As such, the standards to be applied to specific rehabilitation projects must be done so in a reasonable manner, taking into consideration economic and technical feasibility. The *Secretary of the Interior's Standards for Rehabilitation* (36 CFR Part 68) should be followed to rehabilitate the property's interior and exterior features, including, but not limited to, windows, doors, siding, masonry, ceilings, walls, floors, closets, fireplaces and floor plans. DCA's environmental requirements, including the testing and abatement (encapsulation) of lead, must be completed. These exterior and interior guidelines can be found at http://www.nps.gov/tps/standards/rehabilitation.htm.

Summary

DCA recognizes that certain projects deemed historic in nature might require rehabilitation that varies from the general requirements set forth in the other sections of this Guide. Therefore, if a Preservation Professional, as defined in the Environmental Manual, determines that the proposed project has an adverse effect or is a contributing structure which is either listed in the National Register or is eligible for listing in the National Register (or a lot within such a listed or eligible district) and Georgia State Historic Preservation Office (SHPO) has cleared the proposed activities to proceed, then, depending upon the action approved (rehabilitation, demolition and/or new construction), the general rehabilitation standards set forth in the other sections of this Guide may not apply. However, DCA still requires that the completed rehabilitation results in housing that will meet the duration of all tax credit program obligations.

The Applicant must submit to DCA a detailed scope of work that sets forth the proposed rehabilitation or new construction activity in accordance with recommended practices as set forth in *The Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings.*

Review the Historical Significance of the Property

If the historic building is to be rehabilitated, it is critical that the new use not require substantial alteration of distinctive spaces or removal of character defining architectural features or finishes. The construction materials, the form and style of the property, the principal elevations, the major architectural or landscape features, and the principal public spaces constitute some of the elements that should be preserved. Every effort should be made to minimize damage to the materials and features that convey a property's historical significance. Review of any record documentation on file with the National Register of Historic Places or local preservation commissions and supplemented with a physical investigation to identify which character defining features and spaces must be protected whenever any

changes are anticipated.

Reconstruction (demolition and replacement) of Historic Properties

The Applicant shall ensure that, to the greatest extent feasible, the reconstruction of any historic structure deemed infeasible for rehabilitation shall be carried out in a manner that is compatible with the architecture of the original unit and/or other buildings within the surrounding historic district in terms of set-backs, size, scale, massing, design, color, features, and materials, and is responsive to the recommended approaches for new construction set forth in the Secretary's *Standards for the Treatment of Historic Properties*. Therefore, the Applicant shall consult with the Preservation Professional to develop a set of historically compatible model replacement building plans in advance of any planned reconstruction activities, which shall be shared with the public during the initial public hearings, held. Final construction drawings used in the bidding process, including elevations, shall be submitted to the Preservation Professional for review and comment and forwarded to SHPO for final approval prior to the award of a construction contract and the initiation of construction activities. If the Applicant determines that the proposed plans and specifications for the reconstruction do not meet the *Standards* as interpreted by the Preservation Professional, the Applicant shall notify the Advisory Council on Historic Preservation and initiate consultation as set forth at 36 CFR Section 800.5 (e). The Applicant shall follow the recordation and demolition guidelines as established by the Secretary of the Interior prior to the start of any demolition activities. Questions concerning these requirements should be directed to SHPO and DCA prior to application submission.

Any modifications of the historic rehabilitation work scope must be approved in writing by DCA in advance of the project start-up.

BUILDING EXTERIOR DESIGN STANDARDS

Building exteriors should create a residential image appropriate to the market. DCA encourages the use of materials that provide low maintenance and longevity for the life span of the property. All materials are to be installed using standard construction methods and means, and result in the issuance of manufacturers guarantees.

Roofing:

Anti-fungal dimensional (architectural) shingles with a minimum 30-year warranty are required for all shingle roof applications. Flat roofs are not encouraged, but DCA will allow flexibility in roof design if it is part of an energy conservation green building component or a roof design that mimics existing contextual surroundings. Applicants must obtain DCA pre-approval before using one of these alternatives. All edges of the roof must have an aluminum drip edge that extends a minimum 3" under the shingles, 2" onto the fascia and have a minimum ½" 45 degree kick out at the bottom end of the fascia extension.

Gutters and Downspouts:

Seamless gutters and downspouts are mandatory for all construction and on all buildings.

Exterior Cladding:

Insulated vinyl siding must be impact resistant commercial grade with a minimum thickness of 0.046" and a minimum 30 year warranty to be provided by the manufacturer and must meet or exceed ASTM

07793 standards.
Fiber Cement/Cementitious Siding must be 5/16" nominal thickness with a 30-year warranty to be provided by the manufacturer.
Other materials**:** The use of exterior insulation and finish systems (EIFS), and stucco must be pre-approved by DCA prior to application submission. Wood siding is not permitted.
Natural or manufactured stone.
All exterior trim, including fascia and soffits, window and door trim, gable vents, etc. must also be constructed of no or very low maintenance materials. Vinyl soffit must be commercial grade with a minimum thickness of .046" and a minimum 30-year warranty to be provided by the manufacturer. Wood fascia must be covered completely with prefinished aluminum with a minimum thickness of .024". Where exterior brick does not extend to an eve line, aluminum flashing shall be installed that extends a minimum of 2" under/behind the above exterior wall surface material and over the outer edge of the brick to prevent water penetration.

EXTERIOR DOORS AND WINDOWS:

- Exterior doors must be 1 ¾" high durability, insulated (such as steel or fiberglass) and meet the requirements of the *Georgia State Minimum Standard Codes (with Georgia Amendments)*.
- All primary entries must either be within a breezeway or have a minimum roof covering of 3 feet deep by 5 feet wide, including a corresponding porch or concrete pad.
- Exterior doors for fully accessible units must include spring hinges.
- Wood windows are not permitted.
- Windows must not be located within a shower surround area or over shower units.
- Install a continuous bead of silicone caulk behind all nail fins before installing new windows per manufacturer's specifications.
- Skylights, windows and locations, sizes and operable panels must meet the requirements of the *Georgia State Minimum Standard Codes (with Georgia Amendments)*.

Exterior Stairs:

All exterior stairs are to be covered and protected from the elements in both new and the rehabilitation of existing buildings.

BUILDING INTERIORS DESIGN STANDARDS

Applicants must submit waivers at the pre-application stage only if the request is for a change that deviates more than 10% from DCA standards. Requests for a waiver that deviates 10% or less from DCA's architectural standards should be submitted in the full Application. If a room size, unit size, or cabinets' linear frontage or dimension is at least 90% of DCA requirements, then a waiver may be granted. The Applicant must demonstrate that efforts were taken to meet the minimum design criteria

Room Configuration:
Room configuration should be functional while providing economic use of space:

- The primary bathroom shall be accessible from a common area such as a hall. Exceptions may be considered for the rehabilitation of one-bedroom units.

- The kitchen should be accessible from the entry.
- Bathrooms must not open from areas of food preparation or be used as a sole passageway to a habitable room, hall, basement, or the exterior.
- No habitable rooms are permitted in basement or cellar spaces unless egress is provided according to applicable fire codes.
- All windows in bedroom units must comply with all local and state life safety requirements. No windowless bedrooms will be allowed unless an architectural standards pre-application waiver is submitted with documentation evidencing the approval of such by the local code official and/or State Fire Marshal.

Unit Sizes:

The following criteria are the minimum requirements and submissions that appear to violate the spirit and intent of these minimums may be considered by DCA as a poor use of resources.

Net Rentable (Leasable) Square Footage:

This is the DCA definition for calculating "Residential Unit Square Footage" as it pertains to the Architectural Manual and other documents. It is calculated for each individual dwelling type.

The unit net rentable area is measured from the inside face of each of the unit's perimeter walls.

- Net area included air-conditioned space only.
- Measure from the inside (paint) face of all unit perimeter walls.
- Do not include any patio, balcony, or breezeway areas.
- Do not include any outside storage closets.
- Do not deduct any interior walls.
- Include non-revenue units in total net rentable living area (Total Residential Unit Square Footage)

Closets

- According to market demand, a suitable number of closets should be provided for each dwelling unit.
- All closets designed to contain clothes must be a minimum of 2'-0"deep.
- Closets and defined storage areas must not be included in the room area square footage computations.
- Closets and storage spaces in accessible units must meet applicable reach range requirements.

Ceiling Heights

- Flat ceilings must be a minimum of 8'-0" above finished floor.
- Sloped ceilings must not be less than 5'-0" for the purposes of computing floor areas.
- Ceiling heights must meet minimum requirements established by the *Life Safety Code* and the Georgia State Fire Marshal's Office.

Floor Finishes:

Floor finishes are to be suitable for market conditions and appropriate to the space considered.

- Living Areas and Bedrooms: Carpet or LVT
- Bathrooms, Mechanical Closets, Laundry Areas, Kitchen and other high moisture areas: Sheet Vinyl, VCT, LVT or Ceramic Tile.

DCA will evaluate kitchen and living room flooring materials for appropriate marketability, durability, sound transmission, and tenant comfort.

All materials are to be installed to manufacturer's specifications using standard methods and resulting in the issuance of a manufacturer's guarantee. DCA may approve material upgrades that possess improved maintenance qualities, durability, safety and/or indoor air quality for the tenants. Manufacturer's warranties must be submitted to the Owner.

- Carpet: Unit carpeting may have a level loop, textured loop, level cut pile, or level cut/uncut pile texture. DCA may approve alternate carpeting materials and installation methods in units intended for the elderly or disabled. Carpeting shall comply with HUD's Use of Materials Bulletin No. 44d.
- Carpet pad must be installed under all carpeting for which it is intended and should comply with HUD's *Use of Materials Bulletin No. 72a.*
- Sheet vinyl must be a minimum 0.095 thickness and provide a 20-year residential warranty.
- Ceramic floor tile shall be minimum 12" x 12" and installed over poured concrete slab or cementitious backing material.
- VCT must be at minimum 0.080 thickness.
- Luxury Vinyl Tile (LVT) must have a 12mil wear layer and provide a 15-year residential warranty. LVT installed in kitchens, bathrooms, laundry areas and mechanical closets must be 100% waterproof.

Additional Requirements:

- Bathrooms must have adequate storage. If adequate cabinet space is not available, bathrooms must have medicine cabinets. Medicine cabinets should not be placed in party walls unless fire separation is continuous behind and around the cabinet installation.
- Plastic laminate material must be installed the full length and depth on the bottom shelf of vanity sink cabinets and kitchen sink cabinets and must be sealed/caulked around the full perimeter to all cabinet sides to prevent moisture/water penetration.
- Kitchen countertops must be constructed of 3/4" plywood. No particle board, press board or fiber board will be allowed.
- All open voids above and below upper and lower kitchen cabinets shall be sealed with caulk or cabinet matching material/finish and all cabinets shall be caulked where the cabinet meets a wall surface to prevent pest infestation. No open voids will be allowed. All open voids/holes in cabinet backs must be sealed with caulk or expandable foam and all pipe penetrations must be covered with an escutcheon.
- Kitchen cabinets must be provided above and below countertops. Cabinets shall be constructed with solid wood or plywood stiles, rails, doors and drawer fronts. All cabinets will conform to the performance and fabrication requirements of HUD Severe Use and *ANSI/KCMA A161.1-2000* and bear the KCMA Certification Seal.

- Blinds: All windows should have neutral color horizontal mini-blinds. All glass doors should have either mini-blinds or vertical slat blinds.
- Cable outlets must be provided in the main living area and in all bedrooms.
- All interior finishes, especially interior paint, must be low in Volatile Organic Compounds (VOCs) as defined in the EarthCraft Multifamily program (http://www.earthcraft.org/multifamily).
- In new construction and adaptive re-use projects, all water heater tanks must be placed in an overflow pan piped to the exterior of the building, regardless of location and floor level unless a primed p-trap is installed. The temperature and relief valve must also be piped to the exterior. Water heaters must be placed in closets to allow for their removal and inspection by or through the closet door. Water heaters may not be installed over the clothes washer or dryer space.
- Bathroom shower walls shall be either ceramic tile, solid surface material, one-piece fiberglass tub/shower enclosure or one-piece fiberglass shower enclosure. Ceramic wall tile shall be installed over cementitious backing material.
- All dwelling units shall have washer and dryer hookups.

APPLIANCES:

Appliances must include washers, dryers, microwaves, refrigerators, ranges, and dishwashers. Minimum refrigerator sizes for one and two bedroom units—14 cubic feet; three bedroom units— 16 cubic feet. Other kitchen appliance sizes must be appropriate for the unit and number of tenants. Appropriate appliances listed in US EPA's Energy Star program must be provided. Further information is available at http://www.energystar.gov/.

Washers in units must be equipped with a drain pan or floor drain as required by the *Georgia State Minimum Standard Codes (with Georgia Amendments)*. Owner-furnished washers in dwelling units and community laundries shall be front-loading and Energy Star rated. All refrigerators shall have a built in icemaker.

Plumbing

Plumbing components must be replaced if they do not meet the requirements of applicable building codes, do not meet Threshold Section Building Sustainability, do not have the required Effective Remaining Life, 50% of the plumbing system needs replacement, or if lead in water testing results from the Phase I Environmental Site Assessment exceeds regulated levels

Where existing components of a system are to be reused, they will be examined and determined to be in good condition, code compliant and have a remaining useful life of a minimum of 30 years, or covered by the 20-year capital plan and/or subsequent 5-year updates during the 30-year affordability period. Substandard or critical non-code compliant components shall be replaced.

Kitchen fixtures – When existing kitchen fixtures are not reused in accordance with a. above, new sinks and faucets, and associated plumbing shall be installed in each apartment.

Bath fixtures – When existing bath fixtures are not reused in accordance with a. above, new water saving

toilets, tubs and tub surrounds, lavatory sinks, and faucets shall be installed in each apartment.

Three and four-bedroom apartments are encouraged to be designed to include 1½ baths minimum where adequate space is available.

Provision for laundry rooms or laundry hook-ups may be made per project's program requirements.

Provision for other utility plumbing for janitor sinks, floor drains, outdoor faucets, drains for dehumidification systems, etc., may be made as desired or required.

Electrical

The existing electrical system shall be upgraded to meet all applicable codes. If 50% of the system needs replacement, the entire system must be replaced. This includes all wiring for the electrical system. Electrical distribution system minimum panel size is 100 amps, or per code. Electrical switches, outlets, thermostats, phone and television jacks and other controls are to be installed per Fair Housing Act Design Manual requirements in qualified units and per appropriate accessibility law in accessible units. All penetrations of smoke partitions and rated assemblies must comply with fire codes as administered by the local authorities.

Acoustical Isolation:

Acoustical isolation requires a minimum STC rating of 52. Acoustical isolation surpassing the required minimums will increase unit quality. Noise levels on funded properties must meet DCA and HUD noise limitations:

- exteriors – 65 dB
- interiors – 45 dB

In areas where daytime/nighttime noise levels are above these limitations, documentation of the construction and mitigation methods must accompany the application for funding. The following minimum standards apply:

- Between units: 1 hr. rated UL assembly with one layer 5/8" GWB on each side (minimum or per local fire requirements if greater) w/two sets of staggered 2x4 studs (or metal stud equivalent), sound insulated with blanket material to STC rating of 52. All wall edges must be caulked;
- Within unit: one layer ½" GWB on each side 2x4 studs (or metal stud equivalent);
- Floor to floor: 1 hr. rated UL assembly with a minimum STC rating 52. A minimum of 1" lightweight concrete or ¾" gypcrete topping over wood sub floor (optional floor construction may be considered for the rehabilitation of existing residential units).

Thermal Insulation:

Thermal insulation must meet minimum standards as defined in *Georgia State Minimum Standard Energy Code (International Energy Conservation Code).* To prevent freezing of supply lines, all plumbing in exterior walls must be insulated on the cold side of the wall.

Radon:

All new construction must be built in accordance with current EPA requirements for radon resistant construction techniques, including, but not limited to, ASTM E1465 – 08a Standard Practice for Radon Control Options for the Design and Construction of New Low-Rise Residential Buildings. Both new construction and rehabilitated buildings must be tested prior to tenant occupancy for compliance with EPA's established limits for radon levels.

ELECTRIC RECEOTACLE AND FIXTURE LOCATION REQUIREMENTS FOR ELECTRICAL UPGRADES

INTERIOR LOCATIONS:

Kitchens:

- All kitchen receptacles **should** be on a 3-wire grounded 20 amp circuit and **shall** be GFCI protected unless for a dedicated appliance on a dedicated circuit (see NEC).
- Receptacle outlets **shall** be installed every 48 inches at each kitchen wall counter space 12 inches or wider, and **shall** be installed so that no point along the counter line is more than 24 inches from a receptacle outlet in that space (see NEC).
- The kitchen **shall** have two dedicated 20-amp small appliance branch circuits that serve only the kitchen.
- The kitchen **shall** have a non-GFCI protected receptacle for the refrigerator that **should** be located directly behind the refrigerator.
- A permanently installed overhead lighting fixture controlled by a wall switch **shall** be required in the kitchen.

Bathrooms:

- The bathroom **shall** have at least one dedicated 20-amp receptacle outlet, which **shall** be GFCI protected, marked in the service panel, and **shall** be located at least thirty 30 inches and not more than 48 inches above the floor adjacent to the lavatory and not more than 3 feet of the outside edge of each basin and at least 12 inches from the outer rim of any bathtub or shower opening.
- A permanently mounted switch controlled ceiling or wall lighting fixture **shall** be present. Hanging fixtures or lighting tracks **shall not** be located over the tub unless they are over 8 feet above the tub or labeled for wet locations.
- Exhaust fans **shall** include a closure device that seals the duct when the fan is not operating. Ducts **shall** lead directly to the outside air.
- All bathrooms **shall** have an exhaust fan. Newly installed bathroom exhaust fans **shall** be able to move enough air for 8 air changes per hour. All replacement or new exhaust fans **shall** be a maximum of **2.5** sones. The fan **should** be installed in a manner that will encourage the occupants to use it and to leave it on long enough to be effective, for 20 minutes to an hour after showering.

Habitable Rooms (Bedrooms/Living Room/Dining Room/Family Room/Den/Parlor):
One of the following **shall** occur:

- In each family room, dining room, bedroom, living room, parlor, library, den, sunroom,

recreation room or similar room or area, receptacle outlets **shall** be placed so that at a minimum each wall has no less than one receptacle; or

- The receptacles **shall** be spaced so that no point along the perimeter of the floor is more than 6 feet from a receptacle. Receptacles **should** be spaced equal distances apart.
- All existing non-grounded receptacles **shall** be replaced with new polarized non- grounding receptacles, or GFCI receptacles, or the circuit shall be GFCI protected in a two-wire system, and **shall** meet the requirements of RRS 4.6.2.
- ARC-Fault Circuit Interruption (AFCI) protection may be required in bedrooms depending on local code interpretation. Refer to the NEC, which notes the requirements of installation in bedrooms. Local code **shall** be followed.

Laundry Rooms and Utility Areas:

- Every laundry room/utility area **shall** have a receptacle outlet. The washer **shall** have a dedicated (single outlet) receptacle on a separate dedicated 20-amp circuit labeled in panel box. See the requirements at RRS 4.4.1 and 4.6.5.
- The laundry room/utility area **shall** have a permanent lighting fixture controlled by a wall switch.

Closets and Pantries:

- Closet lights **should** be installed, and unsafe fixtures **shall** be removed.
- Only surface-mounted or recessed fluorescent fixtures or recessed incandescent fixtures with enclosed lamps **shall** be installed in closets in the wall or ceiling no less than 6 inches away from any storage as required by the NEC.

Hallways:

- A receptacle **shall** be installed in hallways 10 feet or longer. A convenience receptacle **should** be installed in each hallway.

Attics and Crawlspaces:

- A permanent electric light fixture and outlet **shall** be installed near all heating equipment located in enclosed rooms, attics and crawl spaces to provide for maintenance needs. The light **shall** be controlled by a switch located at the passageway opening.

Unfinished Basements and Garages:

- Outlets installed in unfinished basements and or crawl spaces **shall** be GFCI protected (see NEC Article 210-8 (a) (4). Exception- a receptacle located in a dedicated space for an appliance, such as a washing machine or sump pump.
- Every basement **shall** have at least one switch controlled light fixture and one general- purpose outlet.
- Every attached garage (and detached garages with power), **shall** have at least one GFCI protected receptacle outlet located at least 48 inches above floor.

Equipment:

- Furnaces and Air Conditioning equipment **should** have their own electrical disconnects which are within sight of and readily accessible from equipment for which it is intended and are of correct amperage and installed in accordance with all relevant NEC provisions.

- A permanent electrical receptacle and lighting fixture **shall** be provided near all heating appliances located in enclosed rooms, attics, basements and crawlspaces.
- Wiring for room air conditioners **shall** conform to the NEC.
- Electrical circuits for well pumps (jet pumps or submersible pumps), sump pumps, and septic aerators **shall** be on dedicated circuits labeled in the panel box in accordance with NEC requirements.
- Equipment, such as washing machines and ranges **shall** be grounded per the requirements of NEC.

EXTERIOR LOCATIONS:

- Exterior outlets **shall** be GFCI weather protected per the NEC. Each dwelling **should** have two weather protected GFCI receptacles installed, one located at the front and one located at the rear of the unit.
- A permanently installed light fixture controlled by a wall switch **shall** be located at each exterior door.

ACCESSIBILITY

DCA requires that all projects which receive funding under the Qualified Allocation Plan be designed and constructed in a manner so that the units, common areas, facilities and services are readily accessible to and usable by disabled persons. All projects that receive allocations or funding under the Plan must comply with all applicable federal and state accessibility laws. When two or more accessibility standards apply, the provider is required to follow and apply both standards so that a maximum accessibility is obtained. All Rehabilitation Work Scopes must meet applicable federal, state, local, and DCA requirements. DCA requires 5% of the units to be fully accessible with an additional 2% equipped for the hearing and sight impaired. DCA maintains the same standard for new construction and rehabilitation regarding accessibility requirements. See the Accessibility Manual located in *Appendix A* of this document for further guidance. The work scope should specifically address the work required to bring the property into full compliance with federal, state, local, and DCA requirements. It is mandatory that the Property be designed to meet all applicable federal, state, and DCA requirements for accessibility by the disabled. The accessibility characteristics are to be incorporated in the layout and design of open spaces, building locations and unit designs. Refer to the DCA Accessibility Manual for additional information. Please note that DCA requirements may be more stringent than federal or state requirements.

For new and rehabilitation construction, DCA requires that:

1.) At least 5% of the total units (but no less than one unit) must be equipped for the mobility disabled, including wheelchair-restricted residents.
2.) Roll-in showers must be incorporated into 40% of the mobility-equipped units (but no less than one unit).

3.) At least an additional 2% of the total units (but no less than one unit) must be equipped for the hearing and sight impaired residents.

<u>The same unit cannot be used to satisfy the 5% and 2% requirement.</u>

Preservation of existing affordable housing that cannot be modified to meet accessibility requirements that are not required by law, may request a DCA waiver.

For Scattered Site Projects, the 5% and 2% requirements are applicable to the project as a whole; however, the distribution of the units must be across the non-contiguous parcels.

Newly constructed and rehabilitated single-family and multi-family housing developments receiving DCA funding are subject to statutory and regulatory accessibility requirements. It is the responsibility of the Owner, Architect, and Contractor, to ensure compliance with all federal, state and local laws. DCA's direct relationship to the Owner pertains only to the awarding of funds. The Owner bears final responsibility for compliance, regardless of fault, though he may seek legal restitution from the source of non-compliance.

Specifically, the Owner, Architect, and Contractor must ensure that the project is designed and built to meet applicable standards. Failure to meet these standards may result in federal and state noncompliance and costly repairs or corrections. Projects receiving DCA funding must meet federal, state and local accessibility laws, including, but not limited to:

- *Title II and III of the Americans with Disabilities Act (ADA) applies to all actions of state and municipal governments as well as all "public entities" (Title II) and public accommodations (Title III). The ADA requires compliance with theADA Accessibility Guidelines (ADAAG);*
- *Section 504 of the Rehabilitation Act of 1973 (Section 504) applies to all entities who receive federal funds. Section 504 requires compliance with the Uniform Federal Accessibility Standards (UFAS);*
- *The Fair Housing Amendments Act of 1988 (FHA) applies to all "covered units" of multifamily development regardless of funding source FHA requires compliance with the Fair Housing Accessibility Guidelines (FHAG);*
- *The Georgia Access Law (O.C.G.A. §30-3 et. seq.) and all applicable compliance standards;*
- *Georgia Fair Housing Law (O.C.G.A. §8-3-200 et. seq.) and all applicable compliance standards;*
- *Georgia Single-family Accessibility (O.C.G.A. §8-3-172 et. Seq.) and all applicable compliance standards;*
- Any other accessibility laws and regulations, including local (building and accessibility) codes, applicable to the project.

<u>Each project selected for allocation is required to retain a DCA qualified consultant to monitor the project for accessibility compliance.</u>

The Consultant cannot be a member of the proposed Project Team nor have an Identify of Interest with any member of the proposed ProjectTeam.

The DCA qualified consultant must perform thefollowing:

1. A pre-construction plan and specification review to determine that the proposed property will meet all required accessibility requirements. The Consultant report must be included with the Step 2 construction documents submitted to DCA. At a minimum, the report will include the initial comments from the consultant; all documents related to resolution of identified accessibility issues and a certification from the consultant that the plans appear to meet all accessibilityrequirements.
2. Provide at least two training sessions to the General Contractor and Subcontractors regarding accessibility requirements. One training must be onsite.
3. An inspection of the construction site after framing is completed to determine that the property is following the approved plans and specifications as to accessibility. DCA must receive a copy of the report issued by the consultant as well as documentation that all issues, if any, have been resolved.
4. A final inspection of the property after completion of construction to determine that the property has been constructed in accordance with all accessibility requirements. DCA must receive a copy of the report issued by the consultant as well as documentation that all issues, if any, have been resolved prior to submission of the project cost certification.

Section 504 of the Rehabilitation Act of 1973

A. Applicability.

Section 504 of the Rehabilitation Act of 1973 (Section 504) prohibits discrimination against persons with disabilities in the operation of programs receiving federal financial assistance. Specifically, Section 504 governs the design and construction of housing to ensure that federal programs are operated to be accessible to persons with disabilities, and to ensure that a portion of housing developed with federal funds is accessible to those with mobility, visual, and hearing impairments. These programs include, but are not limited to HOME, CDBG, and other programs under the jurisdiction of the HUD Office of Multifamily Housing Program. HUD regulations implementing Section 504 contain accessibility requirements for new construction and rehabilitation of housing as well as requirements for ensuring that the programs themselves are operated in a manner that is accessible to and usable by persons with disabilities. Both individual units and the common areas of buildings must be accessible under Section 504. **All projects funded under the NHTF that provides for the new construction or rehabilitation of multifamily housing projects must be designed and built in accordance with the appropriate accessibility requirements of Section 504 if the projects will receive tax credit, HUD/HOME Program or other federal funding.** These specific design and construction standards can be found in the Uniform Federal Accessibility Standards (UFAS).

B. Specific 504 Requirements.

New Construction

A minimum of 5% or at least one unit (whichever is greater) of the total units in the project must be accessible to individuals with mobility impairments. In addition to the 5% of units made accessible to individuals with mobility impairments, a minimum of 2% or at least one unit (whichever is greater) of the total units in the project must be accessible to individuals with sensory impairments (hearing or

vision).

Substantial Rehabilitation

If alterations are undertaken to a project that has 15 or more units and the cost of the alteration is 75% or more of the replacement cost of the completed facility, then the accessibility requirements for the projects are the same as for newly constructed projects.

Other Alterations

When other alterations are undertaken, including but not limited to modernization and rehabilitation which does not meet the Threshold of "substantial" rehab under the Act, such alterations are required to be accessible to the maximum extent feasible up to the point where at least 5% or the units in a project are accessible. If alterations of single elements or spaces of a dwelling unit when considered together amount to an alteration of a dwelling unit, then the entire dwelling unit shall be made accessible.

In some cases, Section 504 requirements may be stricter than requirements under the Fair Housing Act. For instance, in regards to townhome development, Section 504 would be applicable to a new construction project composed of all two story townhomes. HUD Notices CPD 00-09 and PIH 99-52 (HA) states that, "a development consisting entirely of multistory townhouses constructed with federal financial assistance is not a covered multifamily dwelling for purposes of the design and construction requirements at 24 CFR §100.205 (FHAG), but would still have to meet the Section 504 5% + 2% accessibility requirements at 24 CFR §8.22 (Section 504). A townhouse development of five (5) or more single story units would still have to comply with the Fair Housing Act design and construction requirements. Whether or not the rehab of a development of two story townhouses would need to meet the 504 requirements would depend on the extent of the rehabilitation and whether the applicant could present documentation that the modifications would not be feasible.

Disaster Mitigation

To the extent applicable/ relevant, housing must be improved to mitigate the potential impact of potential disasters (e.g. earthquakes, hurricanes, floods, wildfires) in accordance with state or local codes, ordinances, and requirements, or such other requirements that HUD may establish.

Specifically regarding flood hazards, the most relevant potential natural disaster for the State of Georgia: Projects shall meet FEMA federal regulations, and HUDs floodplain management requirements at 24 CFR 55, including the 8-Step Floodplain Management Process (when applicable) at 24 CFR 55.20.

Health & Safety

If the housing is occupied at the time of rehabilitation, any life-threatening deficiencies must be identified and addressed immediately. All critical health and safety items, which pose the possibility of death or more than a remote possibility of a critical health issue from long or short- term exposure by one or more of the occupants, shall be addressed. All items that pose a risk to one or more of the occupants, even though it is minimal, because of likely contact on a several times a week basis shall be addressed. All items that threaten the integrity of the house, because failure to replace will lead to deterioration, collapse, or other failure of a housing component shall be addressed. All items that must be done to ensure that all new work complies with the applicable building codes shall be completed. All items that are necessary for basic sanitation and privacy shall be completed. See *Appendix C* for a list of Inspectable Items and Observable Deficiencies, including the identification of life-threatening

deficiencies for the property site, building exterior, building systems, common areas, and units.

Lead-Based Paint

Lead-based paint (LBP) renovation work is necessary to address an important health and safety issue. Lead-based paint hazards and work pose a real health and safety risk to all occupants and need to be taken seriously in all housing unit (unit) constructed prior to 1978. The safety of children under the age of six, pregnant women and women of childbearing years are the most important people to protect from lead-based paint exposure. The occupants may be an older couple, but have the grandchildren who visit frequently, thus exposing a child under six to lead hazards. To be effective, LBP work must accomplish the following:

- Identify all possible lead hazards
- Identify the household and family characteristics
- Provide qualified contractors to perform work
- Provide adequate monitoring of work and
- Ensure that all identified lead-based paint hazards are eliminated and that the unit is physically clear of lead dust above the allowable amounts.

It is up to the risk assessor to identify the lead hazards and family characteristics, and to develop a scope of work for dealing with the hazards, in conjunction with the rehabilitation specialist, who may be detailing the scope of other work to be done at the unit. A plan must also be put in place for the scheduling of the work, including any necessary relocation.

The program will need to ensure that qualified contractors will complete the work, and that they will be provided with adequate oversight to ensure that the work is done adequately and in a safe manner for both the workers and the occupants. Work not done properly or checked carefully could leave the unit less safe than when the work started.

The clearance examination is probably the most important item on the list, because it ensures that the work was completed correctly. When the unit passes clearance, the identified lead-based paint hazards and dust should no longer be a danger to any occupant in the unit. The following regulations must be adhered to during all rehabilitation of target housing:

Federal Regulations:

HUD Lead Safe Housing Rule (Title 24, Part 35) requires various levels of evaluation and treatment of lead paint hazards when federal money is used for rehabilitation of target housing.

EPA Renovation Repair and Painting Rule (40 CFR Part 745) – Requires contractors conducting renovation, repair or maintenance that disturbs paint in target housing or child-occupied facilities to be licensed by EPA and use lead-safe work practices to complete the work. Developers must ensure contractors are properly trained and licensed. More information is available at: http://www2.epa.gov/lead.

HUD/EPA Disclosure Regulations (Title 24, Part 35, Subpart A) – Requires owners of target housing to disclose all lead paint records and related information to potential buyers and/or tenants.

More information is available at:
http://portal.hud.gov/hudportal/documents/huddoc?id=DOC_12347.pdf.

OSHA Lead in Construction Rule (29 CFR Part 1926.62) - Proscribes personal protection measures to be taken when workers are exposed to any lead during construction projects.

More information is available at:
https://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=106 41. The Fannie Mae Physical Needs Assessment Guidelines

Below is a reproduction of the directions for completing the Fannie Mae forms. Note that DCA may have detailed specific guidance above, which overrides these boilerplate directions. The Fannie Mae Physical Needs Assessment will be used in conjunction with the UPCS.

The inspectable areas and observable deficiencies from HUD's Uniform Physical Condition Standards are available through the HUD Exchange website (https://www.hudexchange.info/onecpd/assets/File/HTF-FAQ-Appendices-UPCS-for-Multifamily- and-Single-Family-Housing-Rehabilitation.pdf) and in the Appendix of this document. For all projects involving rehabilitation, the grantee **shall** use the Property Inspection List found in Appendix of this document. Utilizing the property inspection list will ensure that deficiencies are prioritized in a manner that ensures the most critical health and safety issues are addressed.

The property inspection sheet prompts the grantee to categorize deficiencies as "Level 1", "Level 2" or "Level 3". Deficiencies categorized as "Level 3" are assigned top priority and must be addressed as a part of the rehabilitation. Deficiencies categorized as "Level 2" must be addressed prior to addressing deficiencies categorized as "Level 1". Grantees, based upon project costs and available funds, will have flexibility in addressing deficiencies categorized as "Level 1". Thoroughness of the inspection of each potential rehabilitation project, as well as an understanding of the specific needs of the household is important; as similar deficiencies may be categorized at different levels based upon the lifestyle of the client. For example, an inspection may reveal that a bedroom containing only one wall receptacle has extension cords being utilized to power multiple electronic devices. The overloading of the lone receptacle is a health and safety concern that would be categorized as a "Level 3". Alternatively, a bedroom in another home might have only one receptacle, but because the homeowner does not use that bedroom for anything other than a spare room, and no receptacle overloading is observed, the deficiency is more of an inconvenience instead of a health and safety issue, and might be categorized as a "Level 1". Applicants must be able to demonstrate compliance with these standards.

The standard format forms are to help the Consultant conduct a comprehensive and accurate assessment. However, the forms should not constrain the Consultant from fully addressing other findings and may be supplemented as necessary to create a thorough record of the property's physical needs. The forms may be altered to serve the Consultants' needs if the basic format is maintained and the same information is presented.

SPECIFIC GUIDANCE TO THE PROPERTY EVALUATOR

Purpose

The purpose of the Physical Needs Assessment is to identify and provide cost estimates for the following key items:

Immediate Physical Needs - repairs, replacements and significant maintenance items, which should be done immediately.

Physical Needs Over the Term - repairs, replacements and significant maintenance items that will be needed over the term of the mortgage and two years beyond.

As part of the process, instances of deferred maintenance are also identified. The assessment is based on the evaluator's judgment of the actual condition of the improvements and the expected useful life of those improvements. It is understood that the conclusions presented are based upon the evaluator's professional judgment and that the actual performance of individual components may vary from a reasonably expected standard and will be affected by circumstances which occur after the date of the evaluation.

This package explains how to use the set of forms provided by Fannie Mae. It is important to recognize that the forms are intended to help the evaluator conduct a comprehensive and accurate assessment. They also present the results of that assessment in a relatively standard format that will be useful to the lender in making underwriting decisions. However, the forms should not constrain the evaluator from fully presenting concerns and findings. The forms should be used and supplemented in ways that facilitate the preparation and presentation of information useful to the lender regarding the physical needs of the property.

The Systems and Conditions forms may be altered and/or computerized to serve the evaluators' needs so long as information is provided on the condition and Effective Remaining Life of all components and the Effective Remaining Life is compared to the standard Expected Useful Life (EUL). The Summary forms may also be extended or computerized so long as the basic format is maintained.

Terms of Reference Form

The lender's inspector completes this form for the evaluator, as part of the needs assessment form. It serves as a reference point for the assessment and provides the evaluator with basic information about the property and the term of the loan. Four additional topics are covered:

1. Sampling Expectations - The lender's expectations about the number and/or percentage of dwelling units, buildings and specialized systems to evaluate may be stated. If there is no stated expectation, the evaluator should inspect sufficient units, buildings, and numbers of specialized systems to state with confidence the present and probable future condition of each system at the property. The evaluator should provide a separate statement indicating the sampling systems used to ensure a determination of conditions and costs with acceptable accuracy.

   If a Sampling Expectation is provided by the lender, which is not adequate to achieve the requisite level of confidence, the evaluator should so advise the lender. Considerations in determining an adequate sample size are age and number of buildings (especially if the property was developed in phases), total number of units, and variations in size, type and occupancy of units.

   Effective sampling is based on observing a sufficient number of each significant category. Using

the above criteria, categories could include buildings by age of each building (e.g. inspect buildings in the 8 year old phase and in the 11 year old phase), buildings by type (e.g. row house, L-shaped row house, walkup, elevator) and/or buildings by construction materials (e.g. inspect the garden/flat roof/brick walls section and the garden/pitched roof/clapboard walls section).

Dwelling units are separate categories from buildings. At a minimum, sampling is by unit size (0/1/2/3/4 bedrooms). There may be further categories if units are differently configured or equipped, or have different occupants (especially family or elderly). Generally, we would expect the percentage of units inspected to decrease as the total number of unit's increases. Systems that are not unit specific, such as boilers, compactors, elevators and roofs, will often have a 100% sample.

The overriding objective: SEE ENOUGH OF EACH UNIT TYPE AND SYSTEM TO BE ABLE TO STATE WITH CONFIDENCE THE PRESENT AND PROBABLE FUTURE CONDITON.

2. Market Issues - In certain instances, market conditions may necessitate action on certain systems. Examples are early appliance replacement or re-carpeting, new entry paving, special plantings, and redecorated lobbies. If the owner or lender has identified such an action, the evaluator should include cost estimation for such action and indicate what, if any, other costs would be eliminated by such action.
3. Work In Progress - In some instances, work may be underway (which can be observed) or under contract. When known by the lender, this will be noted. For purposes of the report, such work should be assumed complete, unless observed to be unacceptable in quality or scope.
4. Management-Reported Replacements - In some instances, the property ownership or management will provide the lender with information about prior repairs or replacements that have been completed in recent years. The lender may provide this information to the evaluator to assist in the assessment of these components. The evaluator should include enough units, buildings, or systems in the sample to reasonably verify the reported repairs or replacements.

Systems and Conditions Forms

It is the responsibility of the evaluator to assess the condition of every system that is present at a property. All conditions, except as noted below, requiring action during the life of the loan must be addressed regardless of whether the action anticipated is a capital oroperating expense.

To assist evaluators in reviewing all systems at a property, four Systems and Conditions Forms are provided. Each lists a group of systems typically related by trade and/or location. The four forms are Site, Architectural, Mechanical and Electrical, and Dwelling Units. While the forms have several columns, in which information may be recorded, in many instances only the first three columns will be completed. If the condition of a system is acceptable, the Effective Remaining Life exceeds the term of the mortgage by two years, and no action is required, no other columns need to be completed.

The report is not expected to identify minor, inexpensive repairs or other maintenance items that are clearly part of the property owner's current operating pattern and budget so long as these items appear to be taken care of on a regular basis. Examples of such minor operating items are occasional window glazing replacement and/or caulking, modest plumbing repairs, and annual boiler servicing.

However, the evaluator should comment on such items in the report if they do not appear to be routinely addressed or are in need of immediate repair.

The report is expected to address infrequently occurring "big ticket" maintenance items, such as exterior painting, all deferred maintenance of any kind, and repairs or replacements that normally involve significant expense or outside contracting. While the evaluator should note any environmental hazards seen in the course of the inspection, environment-related actions, such as removal of lead-based paint, will be addressed in a separate report prepared by an environmental consultant.

USING THE SYSTEMS AND CONDITIONS FORMS

Purpose

The forms can be used both to record actual observations at a specific location and for an overall summary. For example, the Architectural form can be used for a specific building (or group or identical buildings) as well as for summarizing all information for buildings at a property. The same is true for the Dwelling Unit form. An unlabeled form is included which can be used as a second page for any of the Systems and Conditions Forms.

In some instances, the evaluator will note components, which, while they may continue to be functional, may reduce marketability of the property. For example, single-door refrigerators or appliances in outmoded colors may have such an impact in some properties. The evaluator should note these items, discuss them with the lender, and provide separate estimates of the cost to replace such items if requested.

Each of the four forms has a number of frequently occurring systems and components listed. This list represents only the most frequently observed and is not meant to be all-inclusive. Every system present at the property must be observed and recorded. Any system not listed on the form may be included in the spaces labeled "Other".

Note that the assessment includes the systems and components in both residential and non- residential structures. Thus, garages, community buildings, management and maintenance offices, cabanas, pools, commercial space, and other nonresidential buildings and areas are included.

Items (EUL)

The Expected Useful Life (EUL) figure that appears in parentheses after the Item is taken from the Expected Useful Life Table provided. This table provides standard useful lives of many components typically found in apartment complexes. Where the parentheses do not contain a number, it is because there are various types of similar components with differing economic lives.

The evaluator should turn to the Expected Useful Life Table and select, and insert, the appropriate Expected Useful Life (EUL) number. If the Expected Useful Life (EUL) will, without question, far exceed the term of the mortgage plus two years, the Expected Useful Life (EUL) number need not be inserted.

Note: It is recognized that the Expected Useful Life Tables represents only one possible judgment of the expected life of the various components. If we receive substantial material to the effect that one or more of the estimates are inappropriate, we will make adjustments. Until such changes are made, the Tables

provide a useful and consistent standard for all evaluators to use. They avoid debate on what the appropriate expected life is and permit focus on the evaluator's judgment of the effective remaining life of the actual component in place, as discussed below.

Age

The evaluator should insert the actual Age of the component or may insert "OR" for original. If the actual age is unknown, an estimate is acceptable. If there is a range in Age (for example, components replaced over time), the evaluator may note the range (i.e., 5-7 years) or may use several lines for the same system, putting a different Age of that system on each line.

Condition

This space is provided to indicate the Condition of the component, generally excellent, good, fair, or poor, or a similar and consistent qualitative evaluation.

Effective Remaining Life

This space is provided for the evaluator to indicate the remaining life of the component as is. For standard components with standard maintenance, the Expected Useful Life Table provided by the Lender could be used to determine Effective Remaining Life by deducting the Age from Expected Useful Life (EUL). However, this should not be done automatically. A component with unusually good original quality or exceptional maintenance could have a longer life.

On the other hand, if the component has been poorly maintained or was below standard original quality, the useful life could be shorter than expected. The evaluator applies professional judgment in making a determination of the Effective Remaining Life. If the Effective Remaining Life is longer than the term of the loan plus two years, no deferred maintenance exists, and no action needs to be taken during the life of the loan, no other columns need to be filled out.

The only exception may be Diff? (Difference), as discussed below. This should be noted when the evaluator's estimate of the Effective Remaining Life varies by more than two years from the standard estimate.

(Difference)

The Age of the component should be deducted from the Expected Useful Life (EUL) in parentheses and the answer compared to the Effective Remaining Life estimated by the evaluator. Where there is a difference of over two years, the evaluator should insert a footnote number in the Diff? (Difference) column and supply in an attached list of footnotes a brief statement of why, in the evaluator's judgment, the Effective Remaining Life of the component varies from the standard estimate. This approach provides consistency among evaluators while making best of the evaluators' professional judgment.

Action

If any Action is required - immediately, over the life of the loan, or within two years thereafter - the Action should be recorded as repair, replace, or maintain. Repair is used when only a part of an item requires

action, such as the hydraulics and/or controls of a compactor. Replace is used when the entire item is replaced. Maintain is used where special, non-routine maintenance is required, such as the sandblasting of a swimming pool. In cases where a repair or maintenance may be needed now, and replacement or further maintenance may be needed later, separate lines may be used to identify the separate actions and timing.

Now?

If the item involves a threat to the immediate health and safety of the residents, clearly affects curb appeal, will result in problems that are more serious if not corrected, or should otherwise be accomplished, as part of an immediate repair, maintenance or replacement program, this space should be checked. Replacements which may be needed in year one, but do not require immediate attention, need not be checked.

DM (Deferred Maintenance)

The DM (Deferred Maintenance) space is marked in any instances where current management practice is clearly inadequate and the owner's attention should be called to the item, even if no major expenditure or significant labor may be required.

Quantity

For items requiring action, the evaluator should note the Quantity of the system, with the applicable unit of measure entered (each, unit, square feet, square yards, linear feet, lump sum, etc.).

Field Notes

This space, as well as attachments may be used to record the type of component (16cf, frost. free, Hotpoint), the problem (valves leaking) or other information (consider replacement for marketing purposes, replace 30% per year, work in progress, etc.) that the evaluator will need to complete the Evaluator's Summary.

Sample Form

The following example from the Dwelling Unit Systems and Conditions form illustrates how this form is properly used. The example presumes an 11 story building containing 1 and 2 bedroom units. There are 100 units. The age of the building is 9 years. The term of the proposed loan is 7 years.

Countertop/sinks are 9 years old. (The entry could also be "OR"). Condition is excellent, with an Effective Remaining Life of 10 years. This is significantly different from the anticipated Effective Remaining Life of 1 (an EUL of 10 years minus an Age of 9 years). Therefore, there is a footnote entry “1” in the Diff? column. The footnote will indicate that this item is made of an exceptionally durable material, along with a top quality stainless steel sink.

The evaluator’s estimate of an Effective Remaining Life of 10 years + is beyond the term of +2. No capital need would be reported.

Refrigerators are also original, reported as Hotpoint 16 cf frost-free. Replacement is expected around the Effective Remaining Life, noted as 20% annually and beginning in the 5th year of the loan when the refrigerators are 14 years old. Disposals range from new to original (Age = 0- 9). 20% per year replacements will be needed starting in year 1. The evaluator notes that disposals appear to be replaced as part of the project's normal operations.

Bath fixtures are original, and in good condition. No replacement is expected to be required during the term +2 years. The note indicates that they are "dated looking," which may prompt a market consideration for replacement.

Ceiling is a special entry. The "04" stack of units has experienced water damage to ceilings from a major plumbing leak. This is noted for repair NOW. As this apparently occurs in all 10 units in this stack, and therefore is likely to have more than a modest cost, this action would be reported on the Immediate Physical Needs summary form.

Evaluator's Summary Forms

Two separate forms are used to summarize the evaluator's conclusions from the Systems and Conditions Forms. One summarizes Immediate Physical Needs and the other summarizes the Physical Needs over the Term +2 years.

Evaluator's Summary: Immediate Physical Needs

All of the items for which Now? Are checked are transferred to this form. This form provides for the listing of Items, Quantity, Unit Cost and Total Cost of each. The Item and Quantity are transferred directly from the Systems and Conditions Form.

Unit Cost - This is the cost per unit (sf, ea, lf, etc.) in current dollars to implement the required action. The source of the cost estimate should be listed in a separate attachment. The sources may include a third-party estimation service (e.g., R.S. Means: Repair and Remodeling Cost Data), actual bid or contract prices for the property, estimates from contractors or vendors, the evaluator's own cost files, or published supplier sources.

Total Cost - This is the result of multiplying the quantity times the unit cost. It is expressed in current year dollars.

DM (Deferred Maintenance) -If the item evidences deferred maintenance, this column is checked.

Comments - the comments column, or an attachment, should clearly provide information on the location and the nature of problem being addressed for each item. The information should be adequate for the owner to begin to implement the action.

Evaluator's Summary: Physical Needs over the Term

Those items not listed on the Immediate Physical Needs form, but for which action is anticipated during the term of the loan plus two years, are listed on the form. The item and Quantity are transferred directly from the Systems and Conditions Form. The Unit Cost is calculated in the same manner as on the

Immediate Physical Needs Form.

An attachment should be provided which gives any necessary information on the location of action items and the problem being addressed for each item. The information should be adequate for the owner to begin to implement the action.

Cost by Year - the result of multiplying the quantity times the unit cost, in current dollars, is inserted in the column for the year in which the action is expected to take place. Generally, the Effective Remaining Life estimate provided by the evaluator on the Systems and Conditions will indicate the action year. For example, if the evaluator has indicated that the Effective Remaining Life of the parking lot paving is 4 years, the cost, in current dollars, is inserted in Year 4.

If the items are likely to be done over a number of years, the costs, in current dollars should be spread over the appropriate period. For example, if the Effective Remaining Life of the Refrigerators is estimated to be 4 years, or 3-5 years, one third of the cost of replacing the refrigerators may appear in each of Years 3, 4, and 5.

Total Un-inflated - After inserting all of the appropriate action items, the evaluator should total the items for each year.

Total Inflated - The evaluator should multiply the Total Un-inflated times the factor provided to produce the Total Inflated.

Total Inflated All Pages - On the last sheet, the evaluator should include the Total Inflated Dollars for that page and all prior pages.

Cumulative Total All Pages - On the last sheet, the evaluator should insert the Total Inflated Dollars of that year and all prior years.

Special Repair and Replacement Requirements

While performing a property inspection, the evaluator must be aware that certain building materials and construction practices may cause properties to experience (or to develop in a short time period) problems that can be corrected only with major repairs or replacements.

The following identifies some specific construction related problems; however, the evaluator must be aware that other construction related problems may be found in any property and should be identified. If any of the following requirements are not met or if the evaluator determines that the following conditions or others are present, the evaluator must contact the lender immediately to discuss the timing as well as the cost of the repairs or replacements. The evaluator should ensure that any of these conditions are thoroughly addressed in the Physical Needs Assessment.

Minimum Electrical Capacity - Each apartment unit must have sufficient electrical capacity (amperage) to handle the number of electrical circuits and their use within an apartment. Therefore, the evaluator must determine, based on referencing the National Electric Code as well as local building codes, what is the minimum electrical service needed. In any event, that service must not be less than **100 amperes**

(This specific requirement is a DCA amendment to this section of the Fannie Mae Guidelines).

Electrical Circuit Overload Protection - All apartment unit circuits, as well as electrical circuits elsewhere in an apartment complex, must have circuit breakers as opposed to fuses as circuit overload protection.

Aluminum Wiring - In all cases, where aluminum wiring runs from the panel to the outlets of a unit, the evaluator's inspection should ascertain that the aluminum wiring connections (outlets, switches, appliances, etc.) are made to receptacles rated to accept aluminum wiring or that corrective repair can be done immediately by the owner.

Fire Retardant Treated Plywood - While performing the roof inspection, the evaluator should investigate whether there is any indication that fire-retardant treated plywood was used in the construction of the roof (primarily roof sheathing). This inspection should focus on sections of the roof that are subjected to the greatest amount of heat (e.g., areas that are not shaded or that are poorly ventilated) and, if possible, to inspect the attic for signs of deteriorating fire-retardant treated plywood or plywood that is stamped with a fire rating.

DCA's concern is that certain types of fire-retardant treated plywood rapidly deteriorate when exposed to excessive heat and humidity or may cause nails or other metal fasteners to corrode. Common signs of this condition include a darkening of the wood and the presence of a powder- like substance, warping of the roof and the curling of the shingles. Fire-retardant treated plywood is most likely to be in townhouse properties or other properties with pitched, shingled roofs that were constructed after 1981 and that are located in states east of the Mississippi River and some southwestern states.