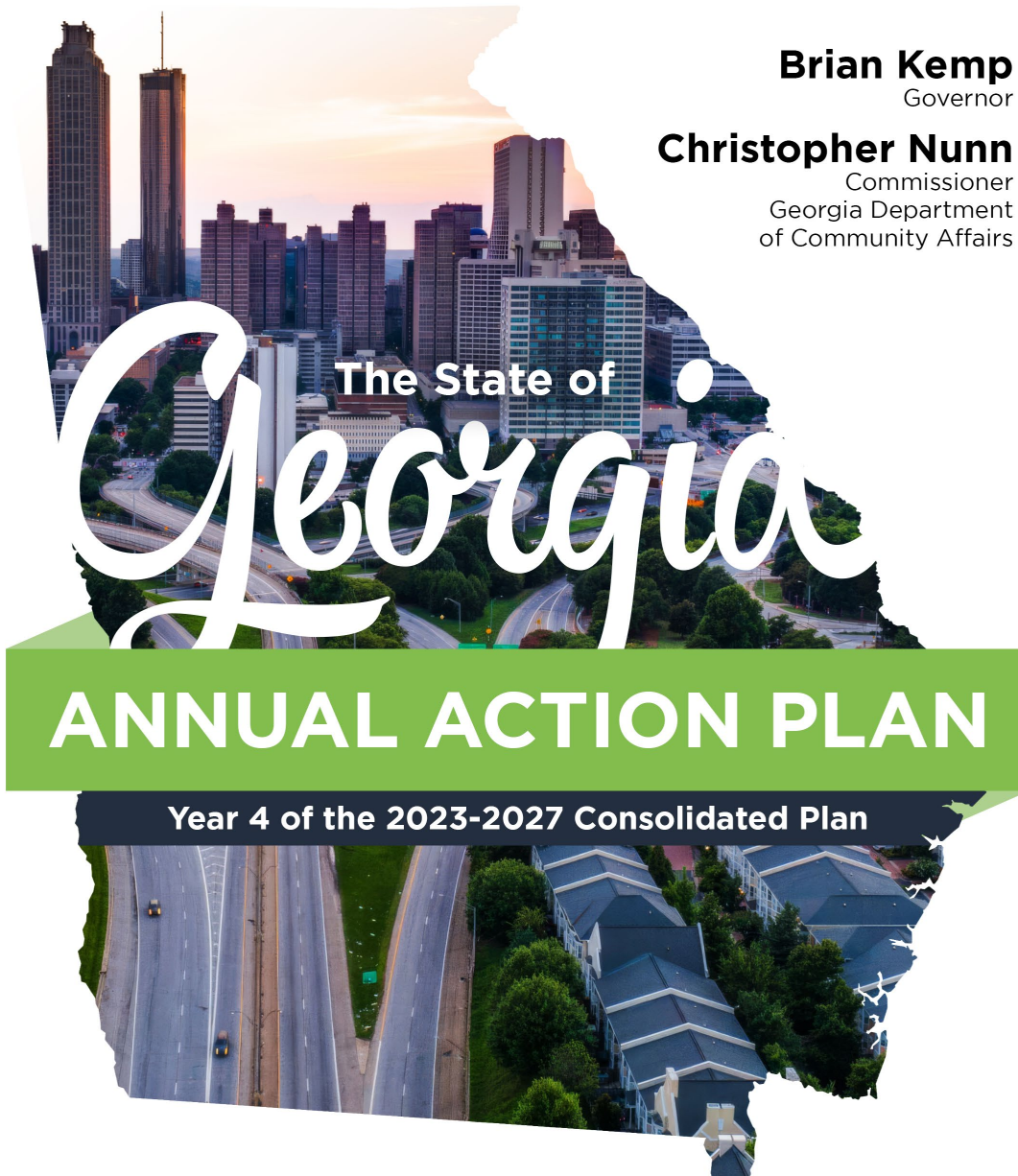




GEORGIA DEPARTMENT  
of COMMUNITY AFFAIRS

**Brian Kemp**  
Governor

**Christopher Nunn**  
Commissioner  
Georgia Department  
of Community Affairs



The State of  
**Georgia**

**ANNUAL ACTION PLAN**

**Year 4 of the 2023-2027 Consolidated Plan**

Federal Fiscal Year 2026 (July 1, 2026 - June 30, 2027)

# Executive Summary

## AP-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)

### Introduction

The Georgia Department of Community Affairs (DCA) is the lead agency overseeing the implementation of the State of Georgia's Consolidated Plan and programs funded by the U.S Department of Housing and Urban Development (HUD).

This (FFY2026/SFY2027) Annual Action Plan is the fourth year of the five-year 2023-2027 Consolidated Planning period. The Annual Action Plan outlines the activities that will be undertaken in the program year (July 1, 2026 to June 30, 2027). In accordance with HUD's 2023-2027 Strategic Framework, the State affirms that it will make every reasonable effort to expend these resources in communities of Georgia with the greatest need. Therefore, the projects identified in this plan will be primarily used to benefit households and individuals within the category of extremely low to moderate-income, along with non-profits and businesses serving these demographic groups.

The six federally funded HUD programs covered by the Action Plan are Community Development Block Grant (CDBG), Community Development Block Grant – Disaster Recovery (CDBG-DR), HOME InvestmentPartnership (HOME), Emergency Solutions Grants (ESG), Housing Opportunities for Persons with AIDS (HOPWA), and the National Housing Trust Fund (NHTF).

The National Housing Trust Fund (NHTF) is the HUD Housing Trust Fund (HTF) program. The State of Georgia uses the designation "National Housing Trust Fund" to differentiate this program from the State of Georgia's State Housing Trust Fund for the Homeless which supports organizations providing housing and services for the homeless individuals and families using State of Georgia resources.

This FFY2026 report will incorporate the Community Development Block Grant – Disaster Recovery program plans (CDBG-DR). The CDBG-DR program is designed in compliance with the National Program objectives and will ensure that assistance is prioritized toward the most disadvantaged populations. DCA will ensure that at minimum, seventy percent of the aggregate of CDBG-DR program funds be used to support long-term recovery activities benefitting low- and moderate-income persons. HUD has allocated \$265,726,000 in CDBG-DR funds to the State of Georgia in response to the 2023-2024 Hurricanes (DR-4738; DR-4821; DR-4830) through the publication of the Federal Register, Vol. 90 No. 10, Thursday, January 16, 2025. This allocation was made available through Public Law 118-158. A separate Disaster Recovery Action Plan with program design has been developed for review and approval by HUD.

### Summarize the objectives and outcomes identified in the Plan

The HUD's 2023-2027 strategic framework focuses on creating communities that are strong, sustainable, affordable, and inclusive for all citizens. Specifically, the State is committed to align its goals with HUD's goals, which consist of the following actions:

- Strengthen the housing market to bolster the economy and protect consumers
- Meet the need for quality and affordable rental homes
- Use housing as a platform to improve quality of life
- Build strong, resilient, and inclusive communities

Based on these goals, the State’s community development and housing strategy consists of expanding economic growth opportunities in local communities with assistance from private sector businesses and providing housing program assistance for underserved populations throughout the State. The State intends to accomplish this strategy through the following actions:

- Increase the number of jobs created and retained through DCA’s community development, economic development, and housing development programs,
- Demonstrate small business expansion in local communities through the State’s Small Business, Credit Initiative and Downtown Development Revolving Loan Fund,
- Continue to provide decent and affordable housing and housing-related services through the HOME, CDBG, ESG, HOPWA, and NHTF programs,
- Increase the access to thriving communities through outreach and development in areas of opportunity,
- Partner with local governments, developers, and nonprofits across Georgia to grow and achieve local visions for strong communities,
- Foster inclusive communities free of barriers to individuals underserved by existing housing programs.

### Evaluation of past performance

The evaluation of past performances through the federally funded programs has enabled the State to set realistic benchmarks and establish significant impacts of the goals stated above. In addition, the State continues to analyze and address regional and local fair housing issues; the contributing factors that affect fair housing choice and set goals that work towards increasing opportunities to affirmatively furthering fair housing (AFFH).

The State made considerable progress during the federal fiscal year (FFY) 2024, as indicated in the State’s Consolidated Annual Performance and Evaluation Report (CAPER) published in September 2025. The FFY 2025 projects are currently underway. The evaluation will be made available in the upcoming CAPER to be published on September 30, 2026. The evaluation of past performance directly influences the State’s goal development and project selection as it aligns the benchmarks with the goals.

Performance in the most recent reporting year covering the July 1, 2024 – June 30, 2025, program year

Goal	Category	Source & Amount	Indicator	Unit of Measure	Expected Strategic Plan	Actual Strategic Plan	Percent Completed	Expected Program Year	Actual Program Year	Percent Completed
<b>Buildings</b>	Non-Housing Community Development	CDBG: \$2,757,450	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	15,000	367,580	2450.5%	3,000	CDBG: 1,017 CDBGCV: 366,175	12240%
<b>Construction/ Rehabilitation of Rental Units</b>	Affordable Housing	HOME: \$20,987,402  HTF: \$4,454,124.92	Rental Units Constructed	Household Housing Unit	HOME:309 NHTF:11 CDBG-DR:75 Total:501	HOME: 427 NHTF: 110  Total: 537	107%	HOME:62 NHTF:23  Total:85	HOME: 70 NHTF: 79  Total: 149	175%
<b>Construction/ Rehabilitation of Rental Units</b>	Affordable Housing	HOME: \$0  HTF: \$11,325,502	Rental Units Rehabilitated	Household Housing Unit	HOME:309 NHTF:116 CDBG-DR:75  Total:500	HOME: 0 NHTF: 189  Total: 189	38%	HOME: 62 NHTF: 23 Total: 85	HOME: 0 NHTF: 102 Total: 102	120%
<b>Economic Development</b>	Non-Housing Community Development	CDBG: \$664,389	Jobs Created/ Retained	Jobs	1,500	154	10.26%	300	57	19%
<b>Emergency Shelter &amp; Transitional Housing</b>	Homeless	ESG:\$1,967,304	Homeless Person Overnight Shelter	Persons Assisted	35,200	14,063	40%	7,040	6,652	95%

<b>Homeless Outreach Assistance</b>	Homeless	ESG: \$393,461	Other	Other	2,150	1,981	92%	430	874	203%
<b>Homeless Prevention Assistance</b>	Non-Homeless Special Needs	ESG: \$442,643	Homelessness Prevention	Persons Assisted	4,200	1,120	27%	840	503	60%
<b>Homeownership Assistance</b>	Affordable Housing	HOME: \$2,514,330	Homeowner Housing Added	Household Housing Unit	97	30	30%	19	21	110%

<b>Homeownership Assistance</b>	Affordable Housing	CDBG: \$2,371,761  HOME: \$4,710,547.23	Homeowner Housing Rehabilitated	Household Housing Unit	HOME: 316 CDBG: 200 CDBGDR17: 63 CDBG-DR18: 100  Total:679	CDBG: 118  HOME: 121  Total:239	35%	CDBG:40  HOME:63  Total:103	CDBG: 49  HOME: 72  Total: 121	117%
<b>HOPWA Housing Assistance</b>	Non-Homeless Special Needs	\$3,999,112	HIV/AIDS Housing Operations	Household Housing Unit	1000	659	66%	200	338	169%
<b>HOPWA Tenant-based Rental Assistance</b>	Non-Homeless Special Needs	\$2,666,075	Tenant-Based Rental Assistance & Rapid Rehousing	Households Assisted	1000	645	64.5%	200	358	179%

<b>Immediate Threat and Danger Program</b>	Non-Housing Community Development	CDBG: \$0	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	2,500	0	0%	500	0	0%
<b>Infrastructure</b>	Non-Housing Community Development	CDBG: \$26,405,548	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	50,000	21,594	43%	10,000	12,572	126%
<b>RapidRe-housing Assistance</b>	Homeless	ESG: \$2,114,852	Tenant-based rental assistance / Rapid Rehousing	Households Assisted	12,500	2,652	21%	2,500	1,123	45%
<b>Redevelopment</b>	Non-Housing Community Development	CDBG: \$640,899	Jobs created/ retained Includes elimination of slum and blight	Jobs	50	0	0%	10	0	0%

## Narrative on performance 2024 – 2025

The State of Georgia achieved the following outcomes for the planned goals for the CDBG, ESG, HOPWA, HOME, and NHTF programs in the fiscal year under review:

This year, the CDBG program assisted over 13,731, persons which is below the expected annual outcome of the FY2024 targets. The number of people benefiting has decreased, in part, due to rising construction costs especially after Covid. Additionally, we have seen fewer applicant governments with the influx of infrastructure dollars in recent years. However, 460,193 persons benefited from the CDBG-CV funds this year. These beneficiaries were assisted through the State's support of Food Banks and Rural Health Centers with CV funds. Additionally, \$6,9387,365.71 was expended during the 2024 program year in CV funds.

CDBG rehabilitated 49 homes, and the CHIP funds used HOME funds to rehabilitate 72 homes, bringing the total to 121 homes, exceeding the goal of rehabilitating 103 homes. CDBG-DR accomplishments will be reported at the end of the five-year consolidated planning reporting period.

The CDBG Immediate Threat and Danger Program requires a state or federal disaster declaration as a catalyst for the deployment of these program dollars, which was implemented in 2020. Given this limited focus, the program has not received any requests for funding which resulted in lower than projected outcomes.

The State of Georgia has exceeded its goal of building new rental housing units by 147%. These funds were invested in Low Income Housing Tax Credit rental housing developments. Each year, the State of Georgia adds or preserves over 7,000 units of affordable rental housing.

Economic Development and Redevelopment activities under the CDBG programs are demonstrating renewed progress following the slowdown experienced during the pandemic. Job creation has been achieved primarily through EIP activities, with limited results reported under the Redevelopment program to date. However, interest in these programs, and thereby job creation activities, appear to be in an upswing, indicating marked improvement in job creation accomplishments in following program years.

The ESG Program provided overnight shelter to 6,652 persons during the reporting period. Outreach efforts exceeded expectations, reaching 874 persons (103% over the annual goal). Homelessness prevention assistance was provided to 503 persons, achieving approximately 60% of the targeted goal of 840. Many households did not qualify due to income levels exceeding Area Median Income (AMI) thresholds or Fair Market Rent (FMR) limits. Additionally, Hurricane Helene significantly impacted southern counties, where numerous rental homes and apartment complexes failed habitability inspections due to limited property access, pending insurance assessments, and contractor shortages.

Rapid Re-Housing services assisted 1,123 persons, approximately 45% of the targeted goal of 2,500. Contributing factors included landlord requirements for applicants to earn three times the monthly rent, rising rental costs, and the continued effects of Hurricane Helene, which further limited available housing stock. Recovery efforts in many southern Georgia counties remain ongoing, influencing overall program outcomes.

HOPWA program provided housing stability to 696 households, including 358 households with Tenant Based Rental Assistance and 338 with other HOPWA housing services including Facility Based Housing, Short-term Housing, and Short-Term Rent, Mortgage and Utility assistance. In addition, 142 households were assisted with Permanent Housing Placement, 320 households were assisted with Housing Information and Referral Services and 886 households received Supportive Services. 878 households received more than one type of HOPWA service with a total of 1139 households receiving HOPWA services.

## Summary of Citizen Participation and Consultation Process

The State encourages participation from:

- Local, and regional institutions
- Continuum of Care partners
- Businesses and developers
- Nonprofit organizations and philanthropic organizations
- Community-based and faith-based organizations
- All Georgia residents

To facilitate participation, a copy of this document is provided in a format accessible to persons with disabilities or translated for non- English-speaking persons. The State is also encouraging participation by residents of public and assisted housing developments, persons of low to moderate income neighborhoods, and areas throughout the State in which funding has been proposed. This document can be accessed on the DCA website at <https://dca.georgia.gov/affordable-housing/housing-development/community-initiatives/hud-planning/hud-planningreporting>

The State will conduct an online public meeting on April 15, 2026, at 10:00 a.m. To register for the online public meeting, attendees are instructed to register at <https://tinyurl.com/yfb7eyay> or email [HUDPlanning@dca.ga.gov](mailto:HUDPlanning@dca.ga.gov) to receive this link by email.

Prior to the online meeting, DCA will promote the Action Plan via social media and in public notices in English and Spanish in all Georgia newspapers. The public comment begins on April 1, 2026, and continues through April 30, 2026. The deadline for public comments on the 2026 Annual Action Plan is April 30, 2026.

## Consultation Process

In FY 2025 - 2026, the State continued efforts to consult with local governments and other state agencies on the preparation of its housing and community development activities. DCA conducts regular interagency meetings to plan and review collaborative efforts related to housing, economic development, and community revitalization.

Additionally, DCA worked closely with the Georgia Council on Developmental Disabilities. This is a federally funded, state agency promoting positive change for individuals and families living with developmental disabilities, as well as groups that advocate for fair housing and disability access, including the SOPOS Coalition.

DCA consults with a number of private housing and service providers, including but not limited to: the Georgia State Trade Association of Nonprofit Developers (G-STAND), the Housing Assistance Council, the Georgia Affordable Housing Coalition (GAHC), 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, the Supportive Housing Committee of the Atlanta Regional Commission.

DCA engages in collaborative initiatives that create opportunities for further consultation. Specifically, the DCA ESG program collaborates with Continuums of Care to gather insights into their local priorities, which in turn inform the annual funding process. The Georgia Homeless Management Information Systems (HMIS) Project is a collaborative effort to implement HMIS across eight of the nine Georgia CoC. DCA also represent in Georgia (HIV) Prevention and Care Council (GPACC) and at Metropolitan Atlanta HIV Health Services Planning Council and receives the input for the housing needs for persons living with HIV/AIDS.

### Summary of public comments

The State will update this section with public comments received related to the 2026 Action Plan. The deadline for public comments is April 30, 2026. Anyone who wishes to comment or ask questions about the Action Plan or any DCA resources should email [HUDPlanning@dca.ga.gov](mailto:HUDPlanning@dca.ga.gov).

## PR-05 Lead & Responsible Agencies - 91.300(b)

### Agency/entity responsible for preparing/administering the Consolidated Plan

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

Agency Role	Name	Department/Agency
CDBG Administrator	GEORGIA	Community Finance Division
ESG Administrator	GEORGIA	Housing Policy & Administrative Division
HOME Administrator	GEORGIA	Homeownership Development & Preservation Division
HOPWA Administrator	GEORGIA	Housing Policy & Administration Division
National Housing Trust Fund Administrator	GEORGIA	Homeownership Development & Preservation Division

**Table 1 – Responsible Agencies**

### Consolidated Plan Public Contact Information

Samanta Carvalho, Division Director

Homeownership Development and Preservation Division

[HUDplanning@dca.ga.gov](mailto:HUDplanning@dca.ga.gov)

(404) 679-056

## AP-10 Consultation - 91.110, 91.300(b); 91.315(l)

### Introduction

Each year the State of Georgia collaborates with various governmental and community partners to plan and administer housing and community development activities.

The State collaborates with ESG Entitlement jurisdictions and local CoCs to set goals and priorities for programs for reducing homelessness. Through the most recent 2024 Homeless Count, the State coordinated with local consolidated planning jurisdictions within counties where the State contracted with a homeless count coordinator to conduct a physical count. Through the assessment of the 2024 Homeless Count data, acting as Collaborative Applicant for the Balance of State CoC, the State identified populations of homelessness within and for each jurisdiction, to assist with local homelessness strategies.

The State also coordinates with local governments with the HOME and CDBG Programs through the implementation of the HOME CHIP Program, the CDBG Annual Competition, and the CDBG set-asides (Employment Incentive Program, Redevelopment Fund, and the Immediate Threat and Danger program) where local governments can be sub-grantees of funds to carry out housing, public facility, infrastructure, and economic development initiatives. Because the State may only award CDBG funds to local governments, the State's city and county governments are the entities that carry out all CDBG activities unless provided for as part of a HUD exemption for special purpose funding such as disaster recovery or neighborhood stabilization. Local governments are critical partners in the CDBG implementation process and provide both local planning and implementation services for the CDBG program, with the State's role supplying an impartial implementation of the Method of Distribution, oversight of local implementation, and management of drawdowns and reporting.

### 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.

As the home state of the landmark case *Olmstead v. L.C.*, the State of Georgia coordinated with several public and private entities to establish the housing and support services required to assist individuals with physical disabilities and behavioral health and developmental disabilities. The settlement agreement mandated the State to serve individuals with developmental disabilities and mental illness in the most integrated setting appropriate to meet the individual's needs. As a result of collaborating with other state agencies, the State agencies formulated a housing plan for individuals with disabilities that focused solely on improving integrated housing. Those agencies included Georgia Department of Behavioral Health and Developmental Disabilities, the Department of Community Health and the Department of Human Services, Division of Aging Services.

DCA has a dedicated field service staff responsible for directly coordinating with private industry, businesses, developers, social service agencies and local governments on potential economic development projects. DCA staff are involved in economic development projects to work with local

governments, private industry, businesses, developers and social service agencies to discuss the economic development funding tools available through DCA and help determine the best option for meeting the needs of potential projects. This coordination often includes site visits to provide a better understanding of all the factors that may need to be addressed by the project. Field staff introduces the federal and state regulations governing each project, the steps for submitting any preliminary documentation (initial project assessment or pre-application), guidance on where to locate the proper application forms and materials, and the appropriate contacts for more specific guidance on what is required.

Field representatives and Central Office staff participate in local, regional, and statewide conferences, providing an opportunity to network with potential partners unfamiliar with the economic development programs offered through DCA. Conferences attended by economic development representatives include the annual CDBG Applicants' and Recipients', Community Development Institute, Downtown Development, Southeast Small Business Lenders, and the Georgia Sustainable Communities Alliance conferences. Through other partners (such as the Technical College System, Regional Planning Commissions, the state university system including special units such as the Small Business Development Centers, Community Development Financial Institutions (CDFIs) and other non-profit groups whose mission is to serve underserved communities and small businesses, the Department of Labor, the state utility partners such as Georgia Power, AGL, MEAG Power, and others), DCA may be brought in during business recruitment in order to provide more direct and focused assistance. DCA Central Office personnel responsible for each economic development program will consult with representatives from private industry, businesses, and developers to provide answers to specific questions and provide further guidance on what is required.

Additional details on organizations consulted can be located on DCA website at <http://www.dca.georgia.gov>

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's primary strategy involves collaborating with Continuums of Care to eradicate all forms of homelessness and maximize the utilization of Rapid Re-Housing to house individuals. In partnership with all CoCs in Georgia, the State manages 1,807 units of Permanent Supportive Housing through the Georgia Housing and Finance Authority to aid the most vulnerable homeless individuals, families, and veterans statewide, including those who are chronically homeless. Following consultations with the CoCs in Georgia and the ESG Entitlements, the State has allocated over \$2 million for Rapid Re-Housing statewide. These Rapid Re-Housing units are filled through the local Continuum of Care's Coordinated Entry system. In an effort to address youth homelessness the Balance of State Continuum of Care has allocated over \$11.7 million in Youth Homelessness Demonstration Program funds to providers to address the unique needs of unaccompanied youth. The state has committed an additional \$3 million to support this work.

The State also established Housing Support Standards (HSS) to ensure that the services provided by all DCA grantees meet a basic standard of care. These standards are not comprehensive nor are they meant to replace standards and guidelines required by licensing agencies. However, the State's objective is to reduce across Georgia the amount of time participants experiences homelessness and to increase housing stability as individuals and households move through the continuum of care. DCA utilizes state funding to continue the implementation of its Continuum of Care Plan that includes the HUD Permanent Supportive Housing program (GHFA PSH) to implement a permanent supportive housing solution to prevent and eliminate homelessness.

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

On an annual basis, the State's ESG Program staff engage with all Continuums of Care (CoCs) across Georgia to solicit input on applications submitted for ESG funding within their respective service areas. CoCs are asked to identify and prioritize eligible activities based on local needs. These locally established priorities are considered as part of DCA's application scoring process and inform subsequent funding recommendations.

CoC leadership provides valuable input by helping to establish funding priorities for ESG eligible activities and by sharing information regarding agency participation in local homeless planning efforts, coordinated entry systems, and the Point-in-Time Count.

The State of Georgia is the lead agency for the HMIS Project, which is a statewide collaborative effort to implement HMIS across eight of the nine Georgia Continuums of Care. The HMIS Steering Committee is made up of two representatives from each of the eight participating Continuums of Care. Participation

in this committee provides a forum through which collaboration takes place and more efficient use of HMIS is achieved on a statewide level.

## Agencies, groups, organizations, and others who participated in the process and consultations

**Table 2 – Agencies, groups, organizations that participated**

1	<b>Agency/Group/Organization</b>	Athens-Clarke Continuum of Care
	<b>Agency/Group/Organization Type</b>	Services-homeless
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs – Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy HOPWA Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Consulted through email and webinar. The anticipated outcomes are better coordination of housing and services for the homeless and awareness of the grant application process.
2	<b>Agency/Group/Organization</b>	Augusta-Richmond Continuum of Care
	<b>Agency/Group/Organization Type</b>	Services-homeless
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy HOPWA Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Consulted through email and webinar. The anticipated outcomes are better coordination of housing and services for the homeless and awareness of the grant application process.

3	<b>Agency/Group/Organization</b>	Cobb County Continuum of Care
	<b>Agency/Group/Organization Type</b>	Services-homeless
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy HOPWA Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Consulted through email and webinar. The anticipated outcomes are better coordination of housing and services for the homeless and awareness of the grant application process.
4	<b>Agency/Group/Organization</b>	Columbus-Muscogee Continuum of Care
	<b>Agency/Group/Organization Type</b>	Services-homeless
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy HOPWA Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Consulted through email and webinar. The anticipated outcomes are better coordination of housing and services for the homeless and awareness of the grant application process.
5	<b>Agency/Group/Organization</b>	Partners for HOME
	<b>Agency/Group/Organization Type</b>	Services-homeless

	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy HOPWA Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Consulted through email and webinar. The anticipated outcomes are better coordination of housing and services for the homeless and awareness of the grant application process.
6	<b>Agency/Group/Organization</b>	Chatham Savannah Authority for the Homeless
	<b>Agency/Group/Organization Type</b>	Services-homeless
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy HOPWA Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Consulted through email and webinar. The anticipated outcomes are better coordination of housing and services for the homeless and awareness of the grant application process.
7	<b>Agency/Group/Organization</b>	CHIP Grantees
	<b>Agency/Group/Organization Type</b>	Other government - County  Other government – Local
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Consulted through email and webinar. The anticipated outcomes better homeownership development planning and better awareness of the grant application process.
8	<b>Agency/Group/Organization</b>	Private Developers
	<b>Agency/Group/Organization Type</b>	Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Market Analysis
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Consulted through email and webinar. The anticipated outcomes are better assessment of affordable housing development needs for families and seniors throughout the state.
9	<b>Agency/Group/Organization</b>	Private Non-profit Organizations
	<b>Agency/Group/Organization Type</b>	Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Market Analysis
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Consulted through email and webinar. The anticipated outcomes are better coordination of housing, community development, and economic development activities and awareness of the grant application process.
10	<b>Agency/Group/Organization</b>	ESG Entitlement Jurisdictions
	<b>Agency/Group/Organization Type</b>	Other government – County Other government – Local

	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Consulted through email and webinar. The anticipated outcomes are better coordination of housing, community development, and economic development activities and awareness of the grant application process.
11	<b>Agency/Group/Organization</b>	CDBG Grantees
	<b>Agency/Group/Organization Type</b>	Other government - County Other government – Local
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Market Analysis Economic Development
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Consulted through email and webinar. The anticipated outcomes are better coordination of housing, community development, and economic development activities and awareness of the grant application process.
12	<b>Agency/Group/Organization</b>	DeKalb County Continuum of Care
	<b>Agency/Group/Organization Type</b>	Services-homeless

	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs – Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy HOPWA Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Consulted through email and webinar. The anticipated outcomes are better coordination of housing, community development, and economic development activities and awareness of the grant application process.
13	<b>Agency/Group/Organization</b>	FULTON COUNTY HEALTH & HUMAN SERVICES DEPARTMENT
	<b>Agency/Group/Organization Type</b>	Services-homeless
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs – Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy HOPWA Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Consulted through email and webinar. The anticipated outcomes are better coordination of housing, community development, and economic development activities and awareness of the grant application process.

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

All known and appropriate agency types are consulted.

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	N/A	N/A

Table 3 - Other local / regional / federal planning efforts

## AP-12 Participation - 91.115, 91.300(c)

### Summary of citizen participation process and efforts made to broaden citizen participation

The State encourages participation from all local and regional institutions, the Continuum of Care and other organizations (including businesses, developers, nonprofit organizations, philanthropic organizations, and community-based and faith-based organizations); all of its citizens, especially minorities and non-English speaking persons, as well as persons with disabilities. To facilitate this, upon request a copy of this document can be provided in a format accessible to persons with disabilities or translated for non-English speaking persons. The State encourages participation by residents of public and assisted housing developments, persons of low to moderate income neighborhoods, and areas throughout the State in which funding has been proposed. This document can also be reviewed on the DCA website at <https://dca.georgia.gov/affordable-housing/housing-development/community-initiatives/hud-planning/hud-planningreporting>

The State will conduct a webinar on housing and community development issues to allow citizens the opportunity to provide input into the FFY2026 Annual Action Plan.

Through newspaper advertisements in English and Spanish, the State will solicit input from citizens to provide feedback on the Method of Distribution for the NHTF, CDBG, HOPWA and ESG Programs. The public comment period will begin on April 1, 2026, and continue through April 30, 2026. The public hearing for the planning process will be held on April 15, 2026, and the last opportunity for written comments on this plan is April 30, 2026.

## 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
1	Virtual Public Meeting	Non-targeted/  broad community	The public hearing will be held online on April 15, 2026.	Comments received will be summarized after the public hearing.	Summary of comments accepted or not accepted will be updated.
2	Newspaper Public Notice	Minorities  Non-English Speaking - Specify other language: Spanish  Non-targeted/ broad community	A public notice was published in each newspaper in Georgia, in English and, where appropriate, in Spanish, to meet the State's language access requirements.	Same as above	Same as above
3	Internet Outreach	Non-targeted/  broad community	The Georgia Department of Community Affairs posted on the DCA Website and Twitter for weeks leading up to the virtual public hearing and posted a public announcement on the DCA website.	Same as above	Same as above

**Table 4 – Citizen Participation Outreach**

## Expected Resources

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

#### Introduction

Georgia provides numerous federal, state, local, and private resources to address the priority needs and objectives identified in this Strategic Plan including:

- CDBG
- HOME
- ESG
- HOPWA
- NHTF
- Housing Choice Vouchers
- State and Federal Low-Income Housing Tax Credits
- Competitive HUD Homeless funds
- CoC funds including Permanent Supportive Housing (PSH)
- State Housing Trust Fund for the Homeless
- Section 811 Project Rental Assistance
- HUD Housing Counseling

This section summarizes the expected amounts of anticipated resources available in year three of the Consolidated Plan (FFY25).

## Anticipated Resources

**TABLE 5: EXPECTED RESOURCES – PRIORITY TABLE**

Program	Annual Allocation	Program Income	Prior Year Resources	Total	Expected Amount Available for Remainder of Con Plan	Narrative Description
<b>CDBG</b>	40,945,091	2,500,000	28,616,738	72,061,829	112,744,245	Required match plus additional leverage will be used with federal funds. The annual allocation is an estimate. All proposed activities' budgets will be proportionally increased or decreased from the estimated funding levels to match actual allocation amounts.
<b>HOME</b>	21,144,992.40	10,000,000	0	31,144,992.40	62,230,000	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.
<b>HOPWA</b>	6,648,791	0	0	6,648,791	6,648,791	Funds will be leveraged as much as possible with other resources, including Ryan White Program and subrecipients will be required to show sources of matching funds.
<b>ESG</b>	4,568,989	0	0	4,568,989	9,137,978	Required 100% match and additional leverage will be used with federal funds
<b>NHTF</b>	4,805,897.84	0	0	4,805,897.84	13,362,375	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.

## 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, 10% of CDBG funds from \$750,001 to \$1,000,000, and 15% of CDBG funds over \$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 20 points can be awarded based on per capita leverage amounts.

### **ESG**

The ESG program requires a 100% match, which can be met through cash or in-kind contributions. Most of these resources come from local agencies that serve as sub-recipients of ESG funds. These agencies include nonprofits, faith-based organizations, Community Action Agencies, Community Service Boards, and local municipalities. The State Housing Trust Fund (SHTF) enhances the ESG program by providing additional funding to support HUD eligible activities. SHTF funds are used to provide supportive services, hotel and motel vouchers, training for sub-recipients, Homeless Management Information System (HMIS), and Coordinated Entry.

### **HOME**

The HOME-funded single-family development program provides points in the competitive application to applicants that provide locally 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 and the National Housing Trust Fund.

### **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, mental health services, medical case management, transportation to and from medical appointments, and emergency financial assistance. Two HOPWA programs link their HOPWA services to Permanent Supportive Housing (formerly known as Shelter Plus Care program), which subsidizes permanent supportive housing for persons living with HIV/AIDS experiencing homelessness. HOPWA agencies also

use private donations and funding to support their programs, and several access foundation grants for that purpose.

**NHTF**

The National Housing Trust Fund will be leveraged with State and Federal Low-Income Housing Tax Credits and HOME funds to develop affordable rental housing for tenants making up to 30% area median income. Developments must also secure project-based rental vouchers to cover operating expenses.

**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.

# Annual Goals and Objectives

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

### Goals Summary Information

All the following goals are for the federal fiscal year 2025 starting July 1, 2025, through June 30, 2026. All activities are to be carried out in Entitlement (Direct CDBG grant recipient cities, counties, and consortia) and Non-Entitlement areas.

**TABLE 6: GOALS SUMMARY**

Goal Name	Category	Needs Addressed	Program	Funding	Goal Outcome Indicator	Predicted Outcome
<b>Construction of rental units</b>	Affordable Housing	Affordable rental housing	HOME & NHTF	HOME: 14,954,068 NHTF: 2,402,948.92	Rental units constructed	HOME: 62 NHTF: 18
<b>Rehabilitation of rental units</b>	Affordable Housing	Preservation of existing units	HOME & NHTF	HOME: 9,866,667 NHTF 2,402,948.92	Homeowner housing rehabilitated	HOME: 75 NHTF: 33
<b>Homeownership assistance</b>	Affordable Housing	Preservation of existing units	HOME & CDBG	HOME: 3,857,590.40 CDBG: 12,971,129	Homeowner housing rehabilitated	HOME: 70 CDBG: 50
<b>Homeownership assistance</b>	Affordable Housing	New affordable homes for homebuyers	HOME	HOME: 2,466,667	Homeowner housing constructed	HOME: 22
<b>Emergency shelter &amp; transitional housing</b>	Homeless	Emergency shelter and transitional housing	ESG	1,827,596	Persons assisted with overnight shelter	7,040
<b>Rapid rehousing</b>	Homeless	Rapid rehousing	ESG	1,964,665	Persons assisted with tenant-based rental assistance/rapid rehousing	1,529

<b>Homeless outreach assistance</b>	Homeless	Homeless outreach	ESG	365,519	Homeless persons engaged	430
<b>Homeless Prevention Assistance</b>	Homeless	Homeless Prevention	ESG	411,209	Homeless Prevention: Persons Assisted	617
<b>HOPWA tenant-based rental assistance</b>	Non-homeless special needs	Rapid rehousing/ homeless prevention	HOPWA	2,659,516	Households assisted with tenant-based rental assistance/rapid rehousing	240
<b>HOPWA housing assistance</b>	Non-homeless special needs	Emergency shelter/short-term housing/permanent housing placement/ homeless prevention/ facility-based housing	HOPWA	3,989,275	Households assisted with HIV/AIDS housing operations	240
<b>Buildings</b>	Non-housing community development	Public facilities	CDBG	5,044,328	Persons assisted with public facilities or infrastructure activities other than low-moderate income housing benefit	2,000
<b>Infrastructure</b>	Non-housing community development	Public facilities	CDBG	48,046,372	Persons assisted with public facilities or infrastructure activities other than low-moderate income housing benefit	4,000
<b>Employment incentive program</b>	Non-housing community development,	Job creation	CDBG	4,000,000	Jobs created/retained	105
<b>Immediate Threat and Danger Program</b>	Non-housing community development	Public Facilities	CDBG	500,000	Persons assisted with public facilities or infrastructure activities other than low-moderate income housing benefit	20

<b>Redevelopment</b>	Non-housing community development	Public Facilities/ Job Creation	CDBG	1,500,000	Jobs created/retained	10
<b>Public Services</b>	Non-housing community development	Public Services			Job readiness training	

**TABLE 7: GOALS DESCRIPTIONS**

1	<b>Goal Name</b>	Construction/Rehabilitation of Rental Units
	<b>Goal Description</b>	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	<b>Goal Name</b>	Homeownership Assistance
	<b>Goal Description</b>	This activity includes the construction of new homeownership units and the rehabilitation of owner-occupied units. 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	<b>Goal Name</b>	CHDO Pre-development Loans
	<b>Goal Description</b>	Georgia does not provide CHDO Pre-Development Loans
4	<b>Goal Name</b>	CHDO Operating Assistance
	<b>Goal Description</b>	Georgia does not provide CHDO Operating Assistance
5	<b>Goal Name</b>	Tenant-based Rental Assistance
	<b>Goal Description</b>	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	<b>Goal Name</b>	Buildings
	<b>Goal Description</b>	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	<b>Goal Name</b>	Infrastructure

	<b>Goal Description</b>	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	<b>Goal Name</b>	Immediate Threat and Danger Program
	<b>Goal Description</b>	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	<b>Goal Name</b>	Economic Development
	<b>Goal Description</b>	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.

10	<b>Goal Name</b>	Redevelopment
	<b>Goal Description</b>	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	<b>Goal Name</b>	Emergency Shelter
	<b>Goal Description</b>	Essential services are provided to homeless families and individuals in emergency shelters by entities operating emergency shelters, 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	<b>Goal Name</b>	Rapid Re-housing Assistance
	<b>Goal Description</b>	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).
13	<b>Goal Name</b>	Homeless Prevention Assistance
	<b>Goal Description</b>	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).
14	<b>Goal Name</b>	Homeless Outreach Assistance
	<b>Goal Description</b>	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	<b>Goal Name</b>	HOPWA Tenant-based Rental Assistance

	<b>Goal Description</b>	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	<b>Goal Name</b>	HOPWA Housing Assistance
	<b>Goal Description</b>	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, Homelessness Prevention through Short-term Rent, Mortgage and Utility Assistance, Housing Information and Referral Services and Resource Identification.
17	<b>Goal Name</b>	Public Services
	<b>Goal Description</b>	Provision of eligible public service activities including job training, childcare, health services, and education services.

## AP-25 Allocation Priorities – 91.320(d)

### Introduction:

The allocation priorities for each fund source are based on needs assessments and distribution of funds by program area.

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.

### Funding Allocation Priorities

**Table 8: Funding Allocation Priorities**

Goals																
	Constructi on and/or Rehab Rental Units (%)	Home- owner Assistance (%)	CHDO Loans (%)	CHDO Operating (%)	TBRA (%)	Buildings (%)	Infrastructure (%)	Immediate Threat & Danger Program (%)	Economic Development (%)	Redevelo- ment (%)	Emergency Shelter (%)	Rapid Re- Housing Assistance (%)	Homeless Outreach Assistance (%)	Homeless Prevention Assistance (%)	HOPWA TBRA (%)	HOPWA (%)
<b>CDBG</b>		18				7	66	1	7	1						
<b>HOME</b>	80	20														
<b>NHTF</b>	100															
<b>HOPWA</b>															40	60
<b>ESG</b>											40	43	8	9		

## Reason for Allocation Priorities

### HOME and NHTF

The percentages for HOME reflect the totals of anticipated 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.

### 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 Prevention and Care Council (GPACC). Priority is given to permanent housing services including TBRA, Permanent FBH and STRMU. No Supportive Services Only projects are funded. HIV Surveillance report published by Georgia Department of Public Health (DPH) is also reviewed to determine the HIV prevalence rate around the state to ensure adequate funding distribution. Funding priorities, and how those funds will be allocated are contained in the annual Method of Distribution. DCA HOPWA Program has also initiated a Pilot HOPWA Reentry program through the Inter-State agency collaboration with Georgia Department of Corrections (GDC) and Department of Community Supervision (DCS). GDC refers the HOPWA eligible pre-release referrals to DCA and its assigned HOPWA Sponsor coordinating the HOPWA Reentry Program. The referrals receive HOPWA housing. DCS provides community supervision to those released with parole or probation, GDC also refers the released HOPWA eligible reentry participants seeking housing assistance to DCA. DCA connects them to HOPWA Sponsors based on the area of residence of the referrals.

The ESG program prioritizes rapid re-housing and emergency shelter in its funding strategy. To guide this process, the DCA ESG program gathers input from the Balance of State Continuum of Care (CoC) and the eight local CoCs across Georgia. This feedback is essential for assessing and prioritizing the needs of these planning bodies and communities. Funds are allocated based on the prioritization of eligible project types, as outlined in the annual Method of Distribution. This plan is presented to the State Housing Trust Fund Board each year for review and approval of the final funding distribution guidelines.

### How will the proposed distribution of funds will 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, sub recipients, 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 because of the additional resources that are created to meet these needs.

## ESG & HOPWA

For both the ESG and HOPWA programs, funding allocation is determined based on priorities set by agencies and local planning bodies. The overarching aim of all project types within these programs is to facilitate stable, permanent housing or to offer temporary housing interventions along with supportive services that lead to this objective. During the previous Consolidated Plan period, it was observed that individuals facing financial crises, but with the potential to achieve self-sufficiency in a short time, tend to fare better in independent housing. Consequently, there was a surge in demand for Tenant-Based Rental Assistance (TBRA) within the HOPWA program. Additionally, due to the prevalence of rural areas within the Balance of State, which often face significant stigma associated with HIV/AIDS, TBRA has emerged as the most effective housing solution. DCA's funding distribution reflects these priorities, with 43% of ESG funds allocated to the rapid re-housing program and 40% of HOPWA funds directed to the TBRA program. Supportive services, particularly case management, play a crucial role in assisting individuals in achieving self-sufficiency. In the case of HOPWA, case management also facilitates connections with HIV medical care and referrals to other affordable housing options. Funds are allocated accordingly to support housing within both programs. While the need remains substantial, particularly considering the poverty levels within the Balance of State CoC, the allocated funds are aimed at assisting those with the most pressing needs, including individuals with very low incomes and multiple barriers such as mental health, substance abuse, criminal backgrounds, and poor or no credit history.

## 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.

## 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, Strategy, Need, and Impact. All applicants will be compared to each other to establish demographics scores. Applications will be rated and scored against each of the following factors, using any additional and/or supplemental information, data, analyses, documentation, commitments, assurances, etc. as may be required or requested by DCA for purposes of evaluating, rating, and selecting applicants under this program. The maximum score is 420 points.

#### Factor 1: Strategy

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

- Alternative solutions
- Analysis of community development needs of the jurisdiction and the target area
- Proposed solution is consistent with locally adopted plan
- 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

#### 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: Need

The purpose of the Need score is to assess the living conditions of target area residents. Critical to this assessment is the level of need documented in the application. A high need is defined as significant health and safety issues and a low need is defined as minimal health and safety issues or amenity issues only. Applicants should explain and justify all long term planned phasing of future projects for the chosen area, especially when 100% of the identified need is not met.

### Factor 4: Impact

The purpose of the Impact score is to gauge the positive result that is expected once the project is completed. This criterion is a combination of objective factors and qualitative factors in order to compare similar projects against each other. Impact points will be based on the following factors:

- Number of persons benefiting
- Cost per person benefiting
- Absolute number of people in poverty for the applicant jurisdiction
- Percent of people in poverty for the applicant jurisdiction
- Median household income of the applicant jurisdiction

Items 3 through 5 are calculated by DCA and utilizes the most recent Census data available.

### 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 in the application that the NEPA review is complete, and funds have been released. Additional readiness points may also be earned through the demonstration of the applicant's capacity to administer CDBG funds through their attendance and completion of application development sessions offered at the Applicants/Recipients Workshop (known as the CDBG Summit).

### Bonus Points Based on Project Type

Points may be earned for projects in the categories of Housing / Neighborhood Stabilization and Water and/or Sewer. Multi-activity and multi-infrastructure projects will be analyzed and the budget prorated to determine if the majority of the project (greater than 50%) qualifies for the bonus points. Additionally, certified Georgia Initiative for Community Housing (GICH) Senior Year communities submitting applications with a housing component are eligible to receive bonus points.

### Bonus Points for Regional Cooperation and Regional Impact

Points may be earned for projects displaying regional cooperation with regional impact. The proposed project must evidence a regional initiative through a revenue and cost sharing agreement or other intergovernmental agreement by multiple jurisdictions or two of more counties that results in regional impacts, benefits, or service delivery.

### Bonus Points for Robust Citizen Participation Process

The goal of these bonus points is to incentivize communities who undertake a robust citizens participation process which provides citizens -- especially low- and moderate-income citizens of the community where CDBG-funded activities will take place -- an opportunity to participate in an advisory role in the planning, implementation, and assessment of the programs and projects. Bonus points will be awarded for demonstrated extra efforts providing an opportunity for citizens, especially LMI citizens, to participate in an advisory role in the planning, implementation, and assessment of the programs and projects funded through CDBG activities.

### 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: <https://dca.georgia.gov/financing-tools/infrastructure/community-development-block-grants-cdbg/annual-cdbg-competition/cdbg#toc-annual-cdbg-competition-manuals>

A complete copy of the Method of Distribution can be found at:

<https://www.dca.georgia.gov/community-economic-development/funding-programs/community-development-block-grants-cdbg/consolidated>

### 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:

- Only one single- or multi-activity application per general purpose local government, whether individually or jointly submitted, shall be eligible for competition.
- Only one single- or multi-activity award may be received by any general-purpose local government.
- 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, 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 “Plan First” 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 \$1,000,000 and \$1,250,000 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.

The scores obtained for the various selection factors will be totaled and applicants with scores of at least 300 points will be awarded grants. In cases where fundable applications exceed available funds, the applicant with the highest number of jobs benefiting low- and moderate-income persons will be given priority.

### 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: <https://www.dca.georgia.gov/community-economic-development/funding-programs/community-development-block-grants-cdbg/employment>

Describe how resources will be allocated among funding categories.

Up to four million (\$4,000,000) 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 \$1,000,000. 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

##### 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: <https://dca.georgia.gov/financing-tools/infrastructure/community-development-block-grants-cdbg/redevelopment-fund>

### 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 \$1,000,000. 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. These situations should typically occur due to a Governor declared "State of Emergency" or Presidential declared disasters and 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: <https://www.dca.georgia.gov/community-economic-development/funding-programs/community-development-block-grants-cdbg/immediate>

**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:

**TABLE 9: DISTRIBUTION METHODS BY STATE PROGRAM**

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

## 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 recent years, public input occurred during the development of the plan, and the application target area is included in the plan.

### CDBG

Five points apiece, for a total of 20, 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

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

### Geographic Distribution

Target Area	Percentage of Funds
Non-entitlement Areas within the State	100
Entitlement and Non-entitlement Areas within the State	0

**Table 9 - Geographic Distribution**

### 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 percentage 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 and NHTF

There are no geographic set-asides for specific geographic areas of Georgia for the HOME and NHTF.

### ESG & HOPWA

The ESG and HOPWA programs in the State do not have designated funding allocations for specific regions of Georgia. Instead, the State focuses on prioritizing the Georgia non-entitlement area and the Balance of State CoC geographic regions for the distribution of ESG funds. As part of the annual competition, the State commits to allocating at least 75% of ESG funds 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, including City of Atlanta and City of Augusta-Richmond County receive their HOPWA allocations directly from the Department of Housing and Urban Development (HUD) and have specific guidelines and separate processes not included within the State's program.

In Georgia, HUD provides HOPWA formula funds to 3 jurisdictions, DCA for 125 counties, City of Atlanta for the Atlanta Eligible Metropolitan Statistical Area (EMSA) including 29 counties and Augusta-Richmond County government for 5 Augusta MSA counties and 2 South Carolina counties.

The HOPWA Program administered by DCA 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 HOPWA Sponsors including nonprofit agencies and health departments (HIV Divisions) directly working with PLWHA within the communities. They also have Ryan White Clinics to provide HIV medical care services to low-income uninsured or under-insured PLWHA. Housing is Healthcare. That is why HOPWA works closely with Ryan White program to provide comprehensive services to PLWHA. DCA also works closely with the Ryan White Part B program and have mirrored the HOPWA service regions with the Public Health Departments. HOPWA Sponsors are either the health departments or have Ryan White clinics or work in close coordination with the health department. 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.

# Affordable Housing

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

### Introduction

The numbers below are based upon the anticipated completion numbers for projects in each of the categories.

**TABLE 10: ONE YEAR GOALS FOR AFFORDABLE HOUSING BY SUPPORT REQUIREMENT**

<b>One Year Goals for the Number of Households to be Supported</b>	
Homeless	8,649
Non-Homeless	354
Special-Needs	480
Total	10,524

**TABLE 11: ONE YEAR GOALS FOR AFFORDABLE HOUSING BY SUPPORT TYPE**

<b>One Year Goals for the Number of Households Supported Through</b>	
Rental Assistance	1,363
The Production of New Units	119
Rehab of Existing Units	235
Acquisition of Existing Units	0
Total	3,054

Homeless numbers include persons served with ESG funds with overnight shelter, rapid re-housing and outreach. Non-Homeless numbers include households in HOME, NHTF, and CDBG-funded rental and homeownership housing. Special-Needs numbers include households served with HOPWA funds. The Rental Assistance numbers include households served with ESG rapid re-housing and HOPWA tenant-based rental assistance. Production of New Units numbers include HOME, NHTF, and CDBG-funded newly constructed units. Rehab of Existing Units include CDBG, HOME, and NHTF -funded rehabilitated homes.

## 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 sub recipients if 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 45 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 three months and six months post discharge.
- Increase the percentage of individuals and families remaining housed for three 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:

- An increase in the number of contacts with unduplicated individuals made during outreach.
- An increase in the percentage of households that access emergency shelter.
- An increase in the percentage of discharged households that access permanent housing.
- 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:

- Continue to provide technical assistance in assisting street outreach programs to 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 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 45 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.

\*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 by providing shelter/emergency housing to an estimated 7,040 homeless individuals through implementation of Georgia's ESG Program.
2. Provide decent affordable housing to an estimated 1,529 persons who would otherwise be living on the street or in shelter 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.

**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 about the priority housing and encourage them to prioritize Rapid Re-Housing funds towards ending homelessness;
- Provide technical assistance in the implementation of Emergency Shelter, 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;
- Continue DCA's work on understanding youth homelessness, and appropriate interventions related thereto.

- Continue to prioritize funding to agencies utilizing a low barrier approach to housing and services.

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 sub-recipients 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 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. Permanent Supportive Housing (formerly known as 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, and an additional grant in 2023. The HUD Section 811 Project Rental Assistance Demonstration Program will enable the state to house the most vulnerable, extremely low-income persons with disabilities. This program is expected to make available 372 units by end of 2026.
- 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 Reentry Partnership Housing (RPH) 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 with HOPWA for (including duplicates):

**TABLE 12: HOPWA ONE-YEAR GOALS**

Short-term rent, mortgage, and utility assistance to prevent homelessness of the individual or family	200
Tenant-based rental assistance	240
Units provided in permanent housing facilities developed, leased, or operated with HOPWA funds	25
Units provided in transitional short-term housing facilities developed, leased, or operated with HOPWA Funds	40
Permanent Housing Placement	110
Total	615

## 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 and meet the needs of families in need for the federal programs the State will carry out these steps:

- 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 numerous 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 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 which 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.

### 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 jobtraining 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 \$4,000,000 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

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

- DCA continues to work with providers to build on the successful implementation of their rapid re-housing and homelessness prevention projects for households with children throughout the state. 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 Priority housing.
  - 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 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 Georgia Initiative for Community Housing (GICH) which provides training sessions and workshops sponsored by the University of Georgia, Georgia Municipal Association, and Georgia Power to help communities create and implement local housing strategy.
- DCA will continue to grow the HUD 811 PRA program that provides facility-based housing on LIHTC properties.
- DCA will collaborate with the DBHDD through the Georgia Behavioral Health Planning and Advisory Council (GBHPAC) to continue to provide resources and services to the chronically homeless.

- 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.
- DCA will continue to participate with Georgia Department of Public Health (DPH) HIV Division through Georgia Prevention and Care Council (GPACC) through representing HOPWA program serving the housing needs of low-income persons living with HIV/AIDS.
- DCA will continue its partnership with Georgia Department of Corrections (GDC) and Department of Community Supervision (DCS) to assist HOPWA eligible reentry citizens in need of housing assistance with stable HOPWA housing to assist with their successful reentry.

### 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 homelessness services through Coordinated Entry.
- Through the continued 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 FY23 for HOME, CDBG, ESG, HOPWA, and NHTF.

### HOME Investment Partnership Program (HOME)

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.
- 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.
- 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.

**TABLE 13: HOME AFFORDABILITY REQUIREMENTS**

Homeownership assistance HOME amount per-unit	Minimum period of affordability in years
Under \$25,000	5
\$25,000 - \$50,000	10
Over \$50,000	15

- 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 \$40 million with approximately \$29 million available for the Annual Competition. The maximum amount available per applicant is \$1,000,000 for Single-Activity projects during the annual competition and \$1,250,000 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.

**TABLE 14: CDBG PLANNED PROJECTS**

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	\$80,100
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
<b>Total Program Income</b>	<b>\$80,100</b>

### 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.

### Emergency Solutions Grants (ESG)

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.

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 seven Coordinated Entry (CE) implementation sites within the BoS CoC: Bartow, Bibb, Clanton, Burke, Hall, Gwinnett and Coastal Coordinated Entry System involving the following counties – Bryan, Camden, Glynn, Liberty, McIntosh and Wayne. 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. An increasing number of CE sites will be operational each year moving forward across the state.

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.

The BoS will have a toll-free hotline number 1-844-249-8367 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. [HomelessInfo@dcaga.zendesk.com](mailto:HomelessInfo@dcaga.zendesk.com) email is also provided to get connected to the resources in the community. The email box is regularly monitored, and all the email requests received and answered with resources to access.

### 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 SHTF 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 SHTF 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 2026 ESG Guidebook, which is available on the DCA website at the link below:

[Emergency Solutions Grants - Manuals](#)

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 solicits information about application submission and application development workshops by email blast and post it on the DCA website. Notices will also be emailed to local government representatives, regional commissions, DCA regional representatives, and other groups with local and regional interests. 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.

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.

#### 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 45 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)

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

As permitted by the Interim Rule, up to 10% of the HTF annual award 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 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 annual funding cycle unless no feasible alternative exists.

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

If distributing HTF funds by selecting applications submitted by eligible recipients:

*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 (DCA), 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.

*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.

*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.

*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.

### **Geographic Diversity**

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.

### **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
- USDA Food Desert Map

*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".*

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. 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".

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.

*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".*

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.

*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".*

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.

*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".*

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. Applicants that are able to provide non-federal sources of funding will have a competitive advantage in scoring.

*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".*

N/A

*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".*

Yes

*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.*

Yes

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.*

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.*

The HTF maximum per-unit subsidy limits were established in 2016, at the program's inception. Georgia uses the HOME's maximum per-unit subsidy amounts.

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).*

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.

*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".*

See Appendix B of this document for recapture and Sale guidelines.

*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".*

N/A. The program currently only supports rental housing development

*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."* DCA will give preference to segments of the ELI population based on the State's priority Housing Needs as described in the Consolidated Plan and Annual Action Plan. Preferences and/or limitations will not be given to students.

### **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 Housing & Finance Authority (GHFA) HOME Investment Partnerships (HOME) Program Recapture Policy

## I. Background

Georgia Housing & Finance Authority (GHFA) is a participating jurisdiction and a recipient of HOME Investment Partnerships (HOME) program funds to be used to expand the supply of decent, safe, sanitary, and affordable housing available to low- income and very low-income residents.

GHFA has established these recapture provisions in accordance with the HUD guidance provided in CPD Notice 12-003 and 24 CFR §92.254 (a)(5)(ii). These provisions permit the original home buyer to sell the property to any willing buyer during the period of affordability while GHFA is able to recapture all or a portion (limited to “net proceeds” as defined below) of the HOME-assistance provided to the original home buyer. The key concepts in the recapture requirements are the Direct HOME Subsidy to the home buyer and net proceeds that are used to determine the amount of HOME assistance subject to recapture and the applicable period of affordability on the unit.

“Direct HOME subsidy” is defined as the amount of HOME assistance that enabled the home buyer to buy the unit. The direct subsidy includes down payment assistance, closing costs, interest subsidy, or other HOME assistance provided directly to the home buyer. In addition, direct subsidy includes any assistance that reduced the purchase price from fair market value to an affordable price. If HOME funds are used for the cost of developing a property and the unit is sold below fair market value, the difference between the fair market value and the purchase price is considered to be directly attributable to the HOME subsidy.

“Net Proceeds” are defined as the sales price minus the superior loan repayment (other than HOME funds) and any closing costs. Under no circumstances can GHFA recapture more than is available from the net proceeds of the sale.

## II. Period of Affordability

The period of affordability is determined by a schedule set forth in 24 CFR §92.254(a)(4). During the period of affordability, the home buyer must maintain the home as their principal place of residence.

Direct HOME Subsidy (per unit)	Period of Affordability
Under \$25,000	5 years
\$25,000 - \$50,000	10 years
Over \$50,000	15 years

**III. Recapture Requirements**

Recapture is an affordability enforcement mechanism where GHFA executes a written agreement with the home buyer that includes the amount of direct HOME subsidy that enabled the home buyer to buy the dwelling unit.

GHFA requires that if a property is sold, either voluntarily or involuntarily (e.g., foreclosure) during the affordability period, all or a portion (limited to “net proceeds”) of the HOME investment must be repaid. For instance, when a home buyer receives HOME down payment assistance to purchase a home, the direct HOME subsidy to the home buyer will result in a specified period of affordability, as set forth in Section II. If the home buyer sells the home before the period ends, GHFA will recapture, assuming that there are sufficient net proceeds, the entire direct HOME subsidy. The home buyer will receive the excess net proceeds.

In addition, the full amount of the subsidy shall be recaptured in the event the home buyer fails to occupy the home as their principal place of residence during the period of affordability, but retains ownership.

GHFA will use restrictions in the executed written agreement and security deed to enforce the recapture provision of the HOME program found at 24 CFR §92.254 (a)(5)(ii) determined during the subsidy layering review. In the event the full amount of the direct HOME subsidy is not recaptured the following calculation will be used.

**Calculation of Net Proceeds and Recapture**

Sales Price		\$
Superior Loan Repayment	-	\$
Closing Cost	-	\$
<b>Net Proceeds</b>	=	\$
<b>Direct HOME Subsidy</b>		\$
<b>GHFA Recapture Amount (lesser of Direct HOME Subsidy or Net Proceeds)</b>		\$
<b>Home Buyer Proceeds (Net Proceeds – GHFA Recapture Amount)</b>		\$

**IV. Foreclosure, Transfer in Lieu of Foreclosure**

If the unit is conveyed pursuant to a foreclosure or other involuntary sale, GHFA must attempt to recoup any direct HOME subsidy from net proceeds, as set forth in Section III that may be available through the foreclosure sale.

**V. Enforcement**

GHFA will ensure that the home buyer maintains the property as their principal residence for the duration of the applicable affordability period. If the home buyer fails to maintain the property as their principal place of residence, the recapture provision will be engaged.

All home buyers will be required to execute legal documents that will be recorded to secure the HOME funds (deed restrictions to enforce the affordability period and to

ensure proper notification of any transfer of the property). In addition, all home buyers must execute and date a HOME written agreement that will include the recapture provision prior to or at the closing of the HOME assisted unit. The written agreement will include the requirements under this policy that will be enforced at the time of the property transfer.

#### **VI. Refinance Policy**

GHFA will require the home buyer to repay the HOME subsidy when refinancing the senior debt. In the event of a catastrophic expense related to property repairs, the home buyer may submit a request to GHFA to allow the refinance of the senior debt to take cash out to cover emergency property repair expenses provided there is sufficient equity in the property. In this instance, GHFA will subordinate to the refinance.

State Recipients or Subrecipients administering a home buyer assistance program funded by the Community HOME Investment Program (CHIP) are allowed to submit requests to GHFA for refinancing if specific life events occur that cause a financial burden on the household, such as recessions, layoff, illness, injury or death. The home buyer must qualify for a fixed rate first mortgage loan and meet all the program requirements identified in the CHIP Program Description.

#### **VII. Subordination Policy**

GHFA will agree to subordinate the HOME Subsidy only in conjunction with the servicer/insurer loss mitigation policies. The home buyer must minimally submit the following documentation: a written request for the subordination, copies of the pending/approved modification agreement from the senior lender (loss mitigation); or estimate of emergency property repair costs and proposed loan commitment. Other documentation may be required at GHFA's discretion.

In accordance with the CHIP Program Description, State Recipients or Subrecipients must monitor the HOME program requirements. They are allowed to submit subordination requests to GHFA for consideration based on the requirements identified in the CHIP Program Description and related program manuals to ensure that the home buyer's property remains affordable and sustainable throughout the period of affordability.

#### **VIII. Ongoing Monitoring**

GHFA or its State Recipients or Subrecipients will conduct ongoing monitoring of the principal residency requirement during the period of affordability. More specifically, GHFA or its State Recipients or Subrecipients will conduct annual verification of the home buyer's principal residency through a variety of methods as identified in the program administrative procedures.

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# GEORGIA DEPARTMENT *of* COMMUNITY AFFAIRS

60 Executive Park South NE  
Atlanta, GA 30329-2231  
404-576-7500  
1-800-359-4663 (Outside Metro Atlanta)  
[dca.georgia.gov](http://dca.georgia.gov)



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