

Georgia Department of Community Affairs

HUD Pathways to Removing Obstacles to Affordable Housing

Draft Proposal for Public Comment, 10/4/2023

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NEED (35 points)

1. Describe your efforts so far to identify, address, mitigate, or remove barriers to affordable housing production and preservation. (12 points)

The Georgia Department of Community Affairs (DCA) is the state agency responsible for housing and community development. DCA administers more than 70 programs and resources with the goal of building strong, vibrant communities (see full list of DCA’s programs in [DCA’s Guide to Services](#)). While each of DCA’s programs interacts with local housing needs, many DCA programs specifically provide support and incentives to local communities for housing issues. DCA has a unique strength and opportunity because the agency houses functionally all state-wide housing programs, allowing a level of coordination and local support that could make Georgia a leader in the Southeast and the nation when it comes to maximizing the combined benefit of HUD programs. Operating as a Housing Finance Agency (HFA), a Public Housing Authority (PHA), bond administrator, HUD block grant program administrator, and the Balance of State Continuum of Care administrator, DCA offers:

- Emergency rental, utility and mortgage assistance;
- A homeownership pathway and down payment assistance for those who qualify;
- Homeless and special needs housing funding opportunities through the Emergency Solutions Grant, Permanent Supportive Housing programs, the Balance of State Continuum of Care, the Home Access program, Housing Opportunities for Persons with Aids, HUD 811 Project Rental Assistance, Reentry Partnership Housing, Youth Homelessness Development Program, and the State Housing Trust Fund for the Homeless;
- Management of Georgia’s Homeless Management Information System to facilitate the Point in Time counts for the homeless population and provide communities with real time information on their population experiencing homelessness and housing instability;
- State administration of HUD’s Community Development Block Grant funding to help communities build infrastructure that can support housing projects;
- Local government planning support and regional commission funding for local housing planning;

- Housing development programs like the Community HOME Investment Program (CHIP) for single family housing rehab and development, the HOME American Rescue Plan funding to assist vulnerable individuals at risk or experiencing housing through funding supportive services and non-congregate shelters; the National Housing Trust Fund;
- State funded Rural Workforce Housing Initiative that equips communities with substantial economic opportunity, including funding for housing infrastructure and construction lending, to address housing shortages for their growing workforce; and
- State and federal tax credit programs, like the Low Income Housing Tax Credit Program and the Historic Rehabilitation Tax Credit Program.

Most of these resources are awarded to local governments, agencies, and developers, including federal resources allotted through DCA's HUD-approved Consolidated Plan and Method of Distribution. As experts in their communities, local community leaders are best equipped to research, devise and execute plans to address their local housing needs, while DCA's role as the state's housing agency is to boost communities' capacity to address their unique housing challenges for all members of their community, provide and ensure good stewardship of resources, and provide education, pathways for collaboration, and facilitate implementation of best practices.

One specific DCA partnership program that best enables the state to support and facilitate these local community efforts is the Georgia Initiative for Community Housing (GICH), which is a key effort in DCA's Consolidated Plan to overcome existing housing barriers (see [DCA's 2023-2027 Consolidated Plan](#), page 114). This proposal builds upon the success of GICH in removing local barriers to affordable housing by awarding targeted, flexible resources and technical assistance to a select qualified group of GICH communities.

Georgia Initiative for Community Housing Summary

The Georgia Initiative for Community Housing (GICH) was developed 20 years ago to provide communities the resources necessary to improve local quality of life and economic vitality through focused planning for housing. The program is a collaborative partnership between the Georgia Department of Community Affairs, the University of Georgia's (UGA) Center for Housing and Community Research (formerly the Housing and Demographic Research Center), UGA's College of Family and Consumer Sciences, and the Georgia Municipal Association, who each assist with program planning, fostering connections to local communities, and providing technical expertise and community facilitation (see section below for details on each party's responsibility in the partnership program and partner MOU available upon request). This public-private partnership also includes support and engagement from the University of Georgia's Office of Public Service and Outreach, Georgia Power, and Wells Fargo Foundation. In its 20 years, the Georgia Initiative for Community Housing program has provided over 90 communities with the tools and resources necessary to improve local quality of life and economic vitality by addressing pressing affordable housing concerns. The infrastructure of GICH positions the program as Georgia's most compelling strategy to combat local barriers to affordable housing.

One of GICH's key advantages is its use of a collaborative model to support communities in the development of locally-driven housing and revitalization strategies that address deteriorating neighborhoods, identify affordable housing options, and provide financial and home buyer education to residents in Georgia communities. Participating communities learn from university experts, state administrative staff and long-time practitioners, and successful peer cities and towns about tools available to improve and develop local housing and neighborhood conditions.

Prior to starting the program, participating counties, cities, or towns form a housing team comprised of representatives from local businesses, city and county government, faith-based organizations, housing authorities, non-profit organizations, real estate professionals, lenders, school district leaders, and residents. These public-private partnership housing teams are then paired with a trained facilitator to build community consensus while designing a locally-based housing plan. The trained facilitators provide regular, engaged support for three program years (titled "Freshman, Sophomore, and Junior Years"), and the selected local teams work year-round to implement their housing plans. Twice a year, approximately 200 housing team members from the 15 communities who are currently participating in the program and active alumni communities come together during a three-day retreat to develop new ideas, learn about approaches and available resources from expert guest speakers and resource representatives, and network with program partners, other team leaders, and community development experts.

In addition to education and technical assistance, GICH contributes funding to participating communities. GICH communities receive the following support from DCA:

- The opportunity to provide a letter of support for a LIHTC development in their community, allowing the project to improve its competitive LIHTC score
- The opportunity to apply to DCA's Non-Entitlement CDBG Annual Competition CDBG Annual Competition when the application contains a housing component, whereas non-GICH communities can only apply every other year
- Additional points in the competitive scoring for DCA's administration of the Community HOME Investment Program (CHIP), which is a HUD HOME single family housing rehab and development program

Since the program's inception in 2005, Georgia Initiative for Community Housing communities have secured millions in housing and community development grant funds from federal and state governments and private organizations, and developers of multi-family housing units working in these communities have been awarded millions in housing tax credits. These awards have translated into transformative change in the construction of new homes and the rehabilitation of substandard homes or removal of vacant dilapidated homes. Through the collaborative efforts of the more than 90 communities that have taken part in the Georgia Initiative for Community Housing, families across the state are living in new homes and experiencing better neighborhood conditions.

While the initial GICH program term is a three-year period, participating communities can remain active participants in GICH by maintaining their housing teams, contributing best practices and lessons learned at the twice annual retreats, and pursuing Certified Alumni status.

For the first two years after graduation and upon application every two years thereafter, GICH communities can receive the status of "Certified Alumni" by demonstrating that their local housing team is active. They are required to prove attendance at GICH retreats, attendance at outside continuing education, yearly team meetings, updated team rosters, and updated local housing plans. Should they demonstrate these five criteria, their DCA program benefits will be extended for two more years, and they are able to reapply for the same benefits every two years. Even Certified Alumni, however, often still face additional barriers to affordable housing production and preservation in their communities. This proposal describes a new program called GICH Senior Year that builds upon the GICH model and aims to tackle those remaining challenges.

GICH Senior Year – Targeted Funding and TA for Priority Communities

One of [DCA's Strategic Goals](#) is to strengthen rural Georgia through local partnerships, measuring success by aligning DCA grant award administration to address the needs outlined in community-driven plans. This November, Georgia will expand GICH with a new opportunity entitled "GICH Senior Year," in which qualifying selected communities who have already completed the initial three years of the program will be selected into a small cohort that receives extensive technical assistance and guaranteed access to funding to implement their local housing plans. This program expansion will allow communities to expand the model from one-off funding applications dotted around their community to an intentional placed-based investment that targets a neighborhood need and braids together DCA and HUD funding to maximize impact. In working closely with the local facilitators, GICH Senior Year communities are eligible to receive over \$50 million in housing funds across the following programs:

- A Community HOME Investment Program (CHIP) grant,¹
- A Community Development Block Grant,²
- A federal and 100% matching state 9% Low Income Housing Tax Credit allocation for a selected development,³
- A federal and 100% matching state 4% Low Income Housing Tax Credit allocation for a selected development,⁴ and
- Additional development financing resources, such as HOME, National Housing Trust Fund, and others as needed and as available.

GICH Senior Year communities will be selected from the existing pool of GICH Certified Alumni and based on quality applications that highlight:

¹DCA has awarded over \$60 million in CHIP Awards since 2010. In 2022, the average DCA CHIP award was around \$400,000.

²In 2022, DCA awarded more than \$34 million in CDBG grants to local communities.

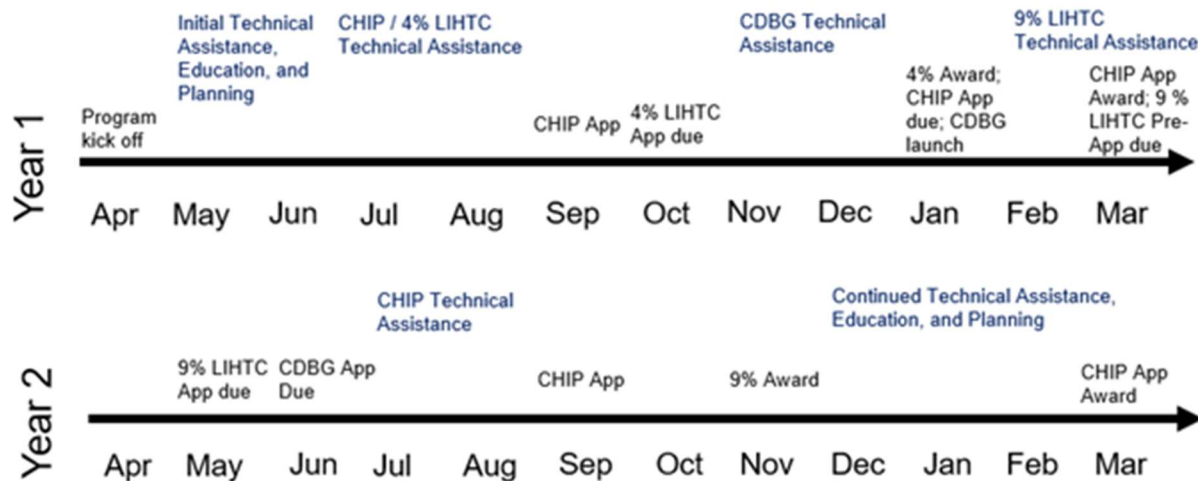
³In Georgia, 9% LIHTC awards have an average total tax credit equity value of \$11,839,099, including federal tax credit equity value of \$7,541,651 and state matching tax credit equity value of \$4,294,448. Since 2017, DCA has awarded more than \$30 million in 9% tax credit awards.

⁴In Georgia, 4% LIHTC awards have an average total tax credit equity value of \$19,976,517, including federal tax credit equity value is \$12,030,637 and state matching tax credit equity value is \$7,945,880. Since 2017, DCA has awarded more than \$54 million in 4% tax credit awards.

1. the previous success and effectiveness of their housing team
2. existing personnel and team infrastructure to successfully tackle an outstanding action plan
3. demonstrated understanding of the socioeconomic and demographic composition of their communities and commitment to serving the whole community through targeting those most in need, and
4. remaining barriers to implement their communities housing plans including remaining financing needs.

Over the course of the program, communities will be expected to meet at least monthly and will receive initial technical assistance to identify what barriers have prevented them from implementing their community’s housing plans and to build consensus around how to overcome those specific barriers. GICH Senior Year communities will receive guidance and direction from DCA, UGA, and GMA stakeholders, as well as other leading Georgia place-based investment programs and nonprofit technical assistance providers. As part of developing their action plan, GICH Senior Year communities will determine how DCA’s financing tools would be used in addressing their community’s housing problems. In implementing their action plans, GICH Senior Year communities will then receive targeted technical assistance from DCA program staff on successful financing projects before the annual competitive application period opens; see Figure A and yearly overview below for the program overview of what this includes.

Figure A: GICH Senior Year Program Overview



Year One:

- Spring: Action Plan Development, including overview of available resources from public and private partners, to include community development and housing specific programs, such as:
 - Homeownership programs and resources from DCA and other community partners
 - AmeriCorps VISTA

- Housing Authorities and Housing Choice Vouchers
- Regional economic development
- Permanent Supportive Housing educators and providers
- Using community data and AFFH planning
- Summer: CHIP and 4% LIHTC Targeted Technical Assistance from DCA Programs
- Fall: CDBG Targeted Technical Assistance from DCA Programs
- Winter: 9% LIHTC Targeted Technical Assistance from DCA Program

Year Two:

- Spring: Re-evaluate Action Plan and assess remaining resources/steps required for implementation
- Summer: CHIP Targeted Technical Assistance from DCA Programs
- Fall-Winter: Continued Technical Assistance for Plan Execution

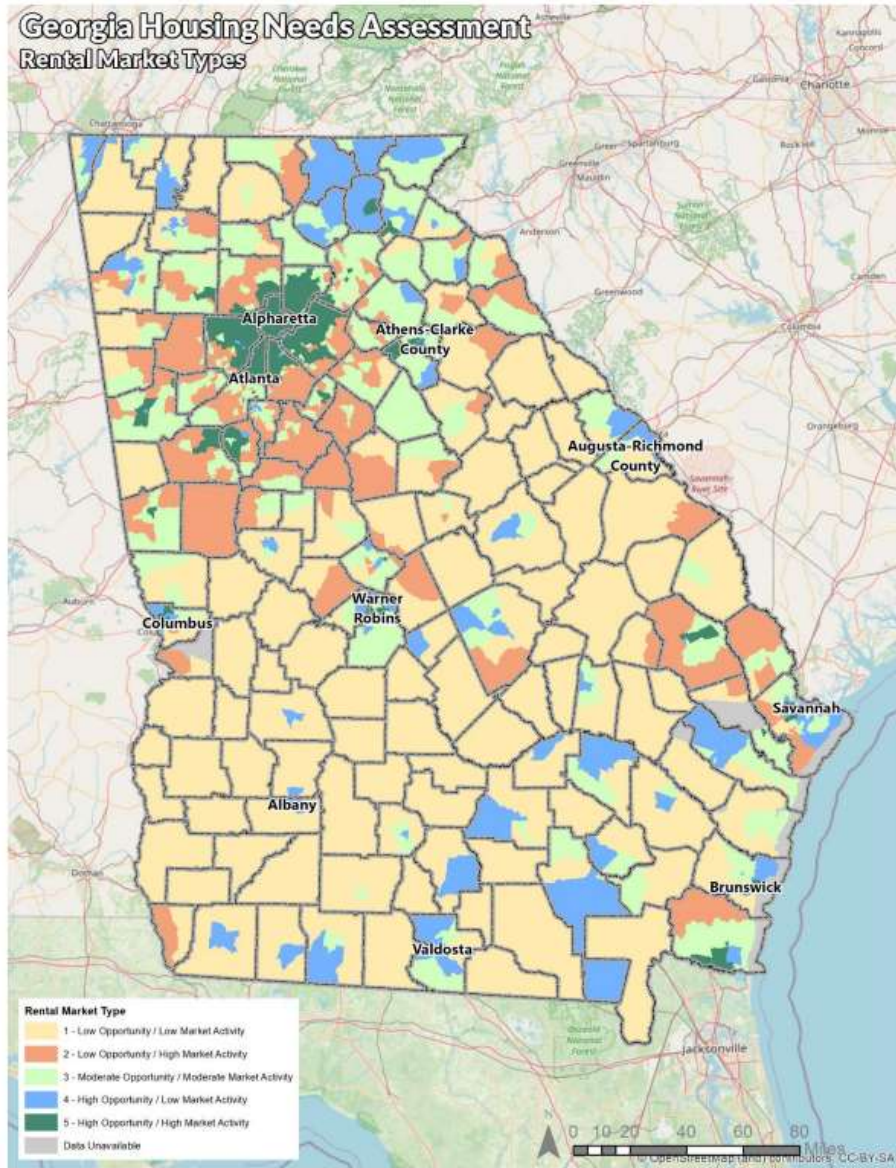
2. Do you have acute demand for affordable housing? What are your remaining affordable housing needs and how do you know? (13 points)

Statewide Housing Demand

A variety of data show that Georgia faces a significant affordable housing shortage. According to a 2023 [Harvard Joint Center for Housing Studies report](#), between 2011 and 2021 Georgia lost more than 317,000 units renting at or below \$1000. From 2020-2023, Georgia DCA conducted a housing needs assessment to further detail its housing needs across the state. According to the summary from that report, “Household growth has outpaced housing growth since 2013. With more households being created than units produced, the housing inventory can’t expand at an adequate rate to meet demand.” This study identified a substantial 395,000 unit gap in available housing units across all income tiers, explaining that the missing supply increases cost of all units which places the largest strain on the lowest income bracket who have the fewest resources. The lack of affordable homes has resulted in significant levels of cost burdened households across the state, including more than half of renters in many areas. According to the National Low Income Housing Coalition, for every 100 Georgia renters earning 50% of the area median income, there are just 53 homes affordable and available to them. With Georgia’s sustained and projected population increase, the state expects this deficit to increase unless action is taken to increase housing supply at all income levels, including that for renters and owners who make up to 80% of the area median income (AMI).

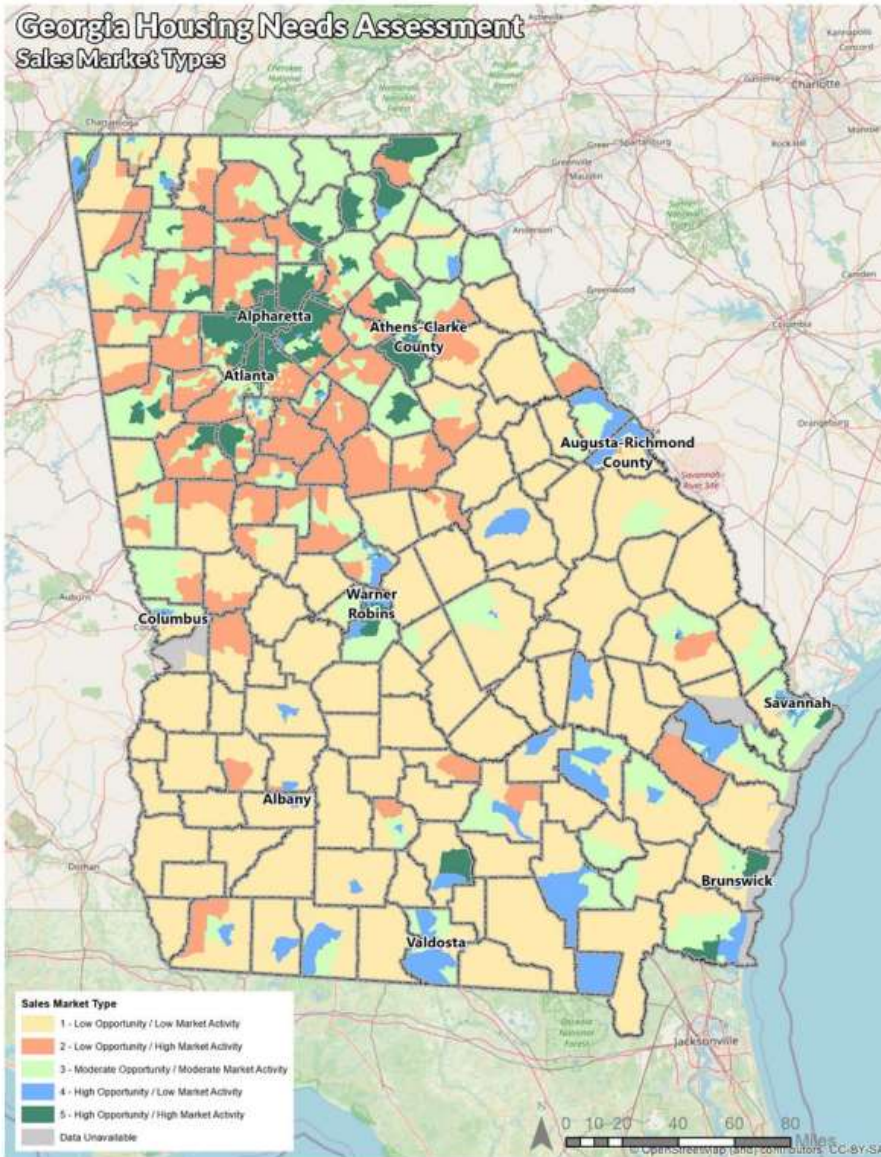
Communities across the state face different affordability challenges based on the level of activity and opportunity in their region. Georgia’s recent Housing Needs Assessment classified the various challenges based on the market typology by rental market and by sales market (See Figures below).

Figure B: Map of Georgia Rental Market Types



Source: Georgia Housing Needs Assessment

Figure C: Map of Georgia Sales Market Types



Source: Georgia Housing Needs Assessment

In partnership with DCA, local housing leaders devise distinct strategies based on the market typology of their community. For example, communities in the greater Albany metro area might devise a strategy that uses housing to incentivize economic activity, including one that considers combining subsidies to address the needs of low wage residents. But communities in the greater metro Atlanta area or the Athens-Clarke metro might have a plan to address affordability challenges that includes embedding affordability incentives or requirements into existing development projects, given the high market activity in those locations. Because DCA serves communities across the state in each market typology, the agency considers local community leaders best equipped to devise and execute plans to address these local housing needs, and the state's role is to lead communities to address their unique housing challenges for all members of their community, partner with communities to provide and ensure good stewardship of resources,

and empower communities through education, pathways for collaboration, and facilitation on implementing best practices.

Housing Demand in GICH Alumni Communities

While housing demand is acute throughout Georgia, Georgia communities who have participated in GICH have developed data-informed, evidence-based plans and are actively working to address the problem. As described above, DCA proposes to use HUD PRO funds to implement a new program called GICH Senior Year. GICH Senior Year is designed to build off the successful momentum of the GICH alumni base and is only available to certified alumni communities who have done significant research and planning through GICH but still face local barriers to housing. Participation in GICH Senior Year comes with an award of up to \$1 million – subject to DCA being awarded HUD PRO funds – to be used to remove local barriers to housing. Incorporating funding from HUD PRO into the program will be critical to ensure motivated, high-need communities have resources to pair with the technical assistance and GICH education.

Because GICH cohorts are selected based on many of the same factors that are used by HUD in the PRO grant application, particularly demonstration of need, there is very strong alignment between HUD’s priority geographies and the communities participating in GICH Senior. 10 of the 48 certified GICH alumni communities are priority communities identified by HUD, while others overlap heavily with Difficult to Develop Areas (DDA) or Qualified Census Tracts (QCT). Additionally, 6 of the 14 current active GICH communities are in priority geographies.

As part of the GICH Senior Year application process, DCA will accept just two alumni communities per 2-year cycle in a competitive application process, for a total of eight communities during the grant period. While DCA does not plan to restrict the pool of eligible applicants to only include HUD priority geographies, DCA will incentivize HUD priority geographies by awarding additional competitive points to those communities. Currently, 10 of the 48 GICH Certified Alumni communities are classified as priority geographies and thus have demonstrated significant need based on one of three HUD need calculations. For the rest of the communities not included in HUD’s priority geography list, they will already have already met GICH selection criteria based on need. For example, below is a sample GICH application question requiring information on affordable housing need:

Q32. Describe the primary housing issues facing the community. In evaluating the adequacy and suitability of existing housing stock to serve current and future community needs, you may consider the following factors: housing types and mix, condition and occupancy, local cost of housing, cost-burdened households in the community, jobs-housing balance, housing needs of special populations, and availability of housing options across the life cycle.

Table 1 below shows the full list of GICH Certified Alumni to date and whether each is listed as a priority geography by HUD. Through GICH Senior Year, eight of these communities will be selected to receive two years of technical assistance and flexible funding to reduce barriers to affordable housing. Table 2 shows the current GICH communities which will be graduating in coming years and certifying as alumni. 6 of the 14 are priority geographies.

Table 1: GICH Certified Alumni List, as of October 3, 2023

GICH Certified Alumni (48)	Priority Geography (10)
Adel	No
Albany	No
Athens-Clarke County	No
Auburn	Yes
Bartow County	No
Blakely	No
Calhoun	No
Centerville	Yes
Cochran	Yes
Conyers	No
Cordele	No
Covington	No
Douglas	No
Douglasville	Yes
Dublin	No
East Point	No
Eatonton	No
Gainesville	No
Garden City	No
Greensboro	No
Griffin	No
Hartwell	No
Jonesboro	No
LaFayette	No
Liberty County	Yes
Madison	Yes
McRae-Helena	No
Millen	No
Nashville	No
Newnan	No
Ocilla	No
Pembroke	No
Perry	No
Rockmart	Yes
Rome	No
Smyrna	Yes
Social Circle	No
Statesboro	Yes
Sumter County	No

Sylvester	No
Thomasville	No
Tifton	Yes
Union City	No
Valdosta	No
Warner Robins	No
Waynesboro	No
Whitfield County	No
Winder	No

Table 2: GICH Communities, as of October 3, 2023

Current GICH Communities (14)	Priority Geography (6)
Augusta-Richmond County	No
Baldwin County	Yes
Canton	Yes
Catoosa County	No
Chamblee	Yes
Chattooga County	No
Cornelia	Yes
Gilmer County	No
Gwinnett County	No
Montezuma	No
St. Marys	No
Thomaston	No
Towns County	Yes
Villa Rica	Yes

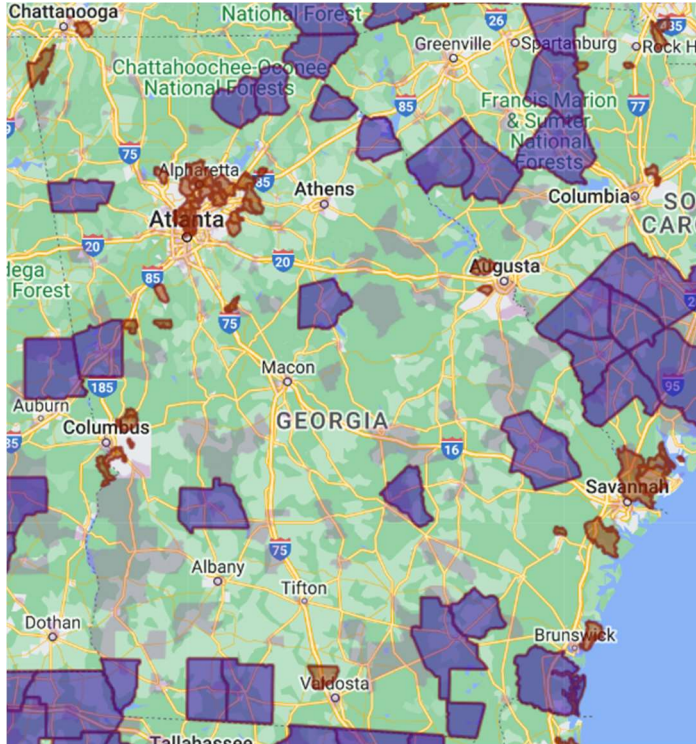
GICH Senior Year Communities with DDAs and QCTs

During the grant period, 16 different HUD priority geography communities will be eligible to apply for participation in GICH Senior Year and to receive Georgia PRO funds. While not initially deemed priority geographies, many of the remaining 46 eligible communities also have significant need locally.

Difficult to Develop Areas (DDA), as seen below on the 2024 [HUD map](#), indicate further affordable housing challenges related to high land, construction and utility costs relative to the area median income. Several communities eligible for GICH Senior Year that are not listed as HUD priority geographies overlap with DDAs, including Sumter County, Roswell, McRae-Helena, St. Marys, and Thomasville. In addition, HUD’s recently released 2024 list of Qualified Census Tracts shows overlap within a number of GICH certified alumni communities, including Athens-Clarke County, Montezuma, Blakely, Valdosta, Waynesboro, Conyers, and several more. More detailed analysis is needed to determine the full extent of overlap between GICH

communities and DDAs and QCTs. DCA may consider prioritizing GICH Senior Year applicants who intend to develop new housing in a DDA or QCT. Below is a map highlighting metro (brown) and non-metro (purple) DDAs, as well as QCTs (faint red), in Georgia.

Figure D: Map of Georgia QCTs and DDAs



Source: HUD Office of Policy Development and Research

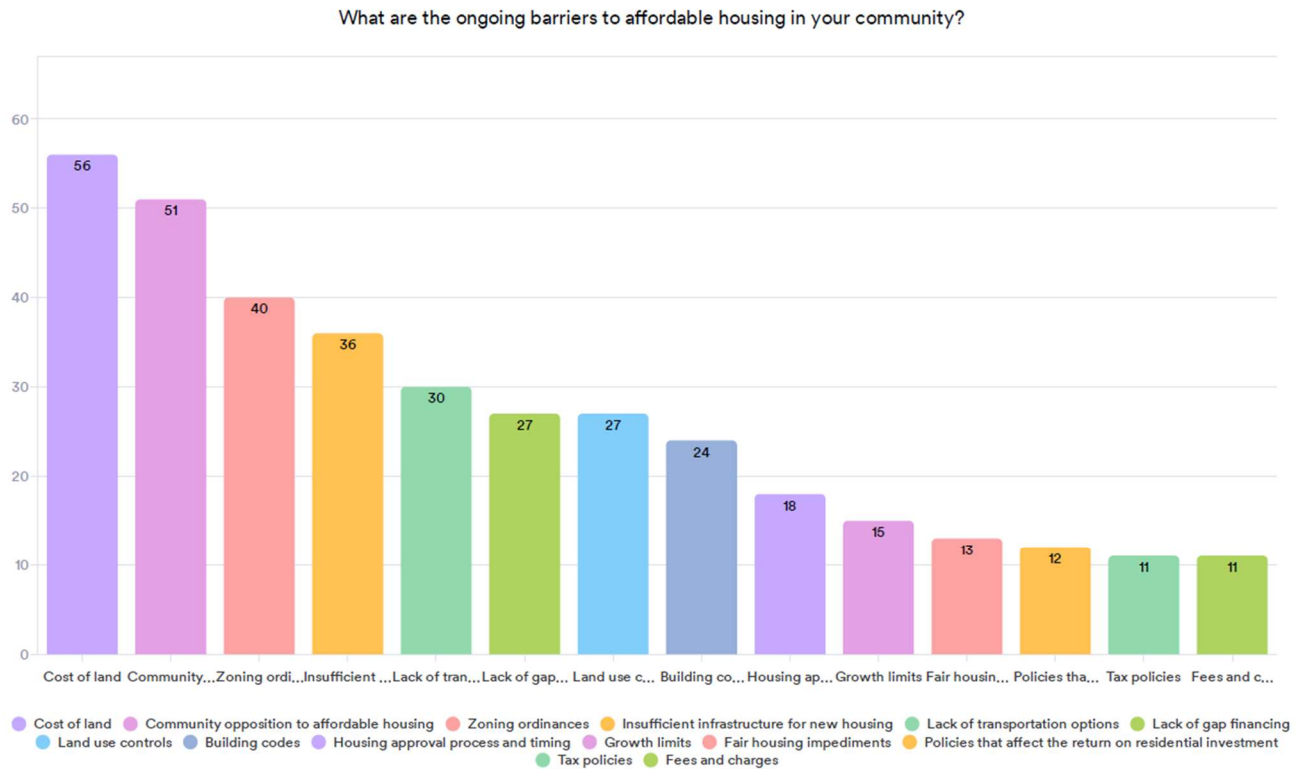
3. What key barriers still exist and need to be addressed to produce and preserve more affordable housing? (10 points)

As mentioned above, GICH is a successful, locally-oriented program, but there remains an outstanding need for affordable housing across the state, especially with Georgia’s recent and continuing population growth. The GICH program allows each community to identify and execute a coordinated plan to address their unique barriers to building affordable housing. DCA has learned from these communities that the agency can have a larger impact and provide more positive outcomes through coordinating our opportunities to trigger additional market investments. For example, one GICH community Statesboro took the information they learned from GICH and worked with their local government to establish and enforce new policies for affordable housing, including a land bank, ordinances allowing the construction of townhomes, and code enforcement to address blight, which prompted additional private investment in their community. Another GICH participant - the City of Washington – learned how to utilize their CHIP and CDBG awards collectively to remove blighted properties and build new, affordable homes in an underinvested neighborhood; on what was a largely abandoned street now sits a beautiful set of homes. Likewise, the City of Pembroke is another successful example among many GICH communities; Pembroke used their GICH experience to plan for and coordinate receipt of LIHTC, CDBG, and CHIP projects, using these investments to target the area

surrounding the new city hall in which they invested to catalyze a generational extension of their downtown business and residential districts.

Despite local progress, funding remains a persistent challenge that many communities face to implementing their housing plans. There are many private and public resources in housing development, and yet there remain key gaps in many communities’ ability to fully finance their affordable housing plans. In a recent survey, GICH communities identified outstanding barriers to implementing their affordable housing strategies (see Figure E below), and most identified barriers that could be overcome if the communities had access to additional financial resources to fund efforts to address those issues, such as land acquisition, comprehensive zoning/land use/building code reviews and modification, additional transportation options, new housing site infrastructure, gap financing, and others.

Figure E: Chart of Ongoing Affordable Housing Barriers in GICH Communities



SOUNDNESS OF APPROACH (35 Points)

1. What is your vision? (15 points)

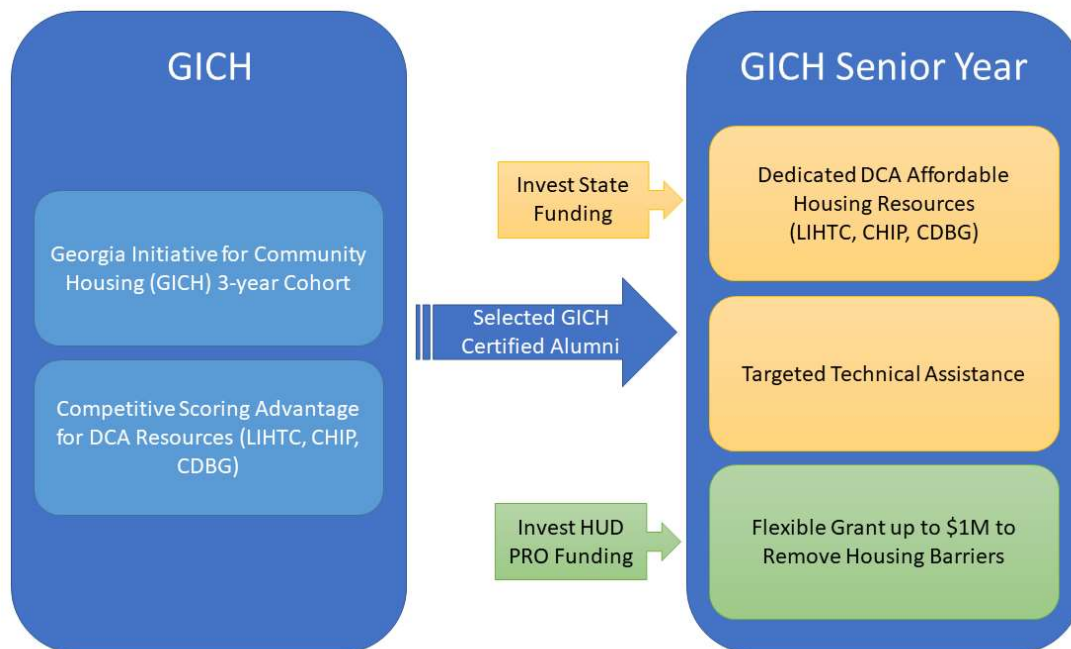
The Georgia Department of Community Affairs (DCA) requests \$8.24 million through the HUD Pathways to Removing Obstacles to Housing grant to create a state-administered flexible grant for qualifying communities to implement their local housing plans and remove local barriers; DCA would call this grant offering the Georgia Pathways to Removing Obstacles (PRO) Housing grant.

Based on the success of HUD’s Choice Neighborhoods program, DCA wants to facilitate a similarly flexible financing tool to help coordinate public and private resources specifically for community housing projects that achieve the CDBG national objective to benefit low and moderate income persons and households. DCA anticipates communities to use the Georgia PRO Housing grant fund for a wide range of housing activities; some communities might use the funds to evaluate or update their existing local zoning codes and permitting process, while other communities will use the funds to acquire land for the city to own and use as part of an affordable housing development and others might use the funds for owner occupied rehab. Grant recipients will be able to determine how these funds are spent based on their own localized action plan and the gaps they identify in financing the implementation of their plan.

Much like other federal grant administration such as CDBG, CHIP, etc., this flexible grant structure would enable DCA to pass through the flexible grant funds directly to the Georgia communities who are best equipped to use them for building and preserving affordable housing; DCA would use the GICH Senior Year framework as described above and below to select the local communities eligible for the funding after they have received extensive education, technical assistance, and support from DCA, UGA, and other GICH support. This structure would enable Georgia communities who might otherwise be unfamiliar with federal grants processes to still have access to these federal resources through a funding mechanism with which they are familiar and through which they are actively participating in targeted technical assistance: the Georgia DCA. DCA is Georgia’s one-stop resource for all housing and community development resources; DCA provides planning support, Geographic Information Systems support, learning and development, and more, in addition to the financial resources and technical assistance communities need to make community improvements.

To receive the grant, communities must be selected as “GICH Senior Year” participants, meaning that at minimum they have completed three GICH programmatic years and have an active local housing team and local housing plan (see more information on GICH in the NEED section). DCA will determine additional competitive criteria for selection into the program. For the proposed Georgia PRO flexible grant, the maximum award amount per community would be \$1 million, and each community would have up to two years to expend the funds. As DCA has heard continuously from our existing GICH communities (see Figure E above), awards of this size will be critical to fund planning and coordination infrastructure in communities across Georgia.

Figure F: GICH Senior Year Model



GICH Senior Year communities would be able to use these funds to further develop their housing strategies or to cover the gaps in financing for their affordable housing plans, to the extent those activities are allowable under HUD’s grant guidance. Through the GICH Senior Year program, DCA is coordinating targeted resources to demonstrate how communities can achieve increased value through coordinating multiple financing tools within a single plan and timeframe, but DCA learned that there are many other costs that are not typically covered by other funding sources that prevent communities from being able to successfully coordinate the existing plans and resources. For example:

- In a recent survey of GICH participants, one community suggested, “For our community, affordable housing means a stronger happier workforce. Sacrifices need to be made in zoning and planning requirements, so builders can afford to build the homes that blue collar wages can be used to buy or rent.” A flexible funding source like DCA’s proposal for the Georgia PRO Housing grant would allow this community to fund a comprehensive review and change management plan of those zoning and planning requirements. This same community also suggested that another hurdle their community faced was funding for projects that could serve households between 80-120% AMI. While they have layered existing resources that serve those below 80% AMI to acquire and construct some homes, they remain unable to find financing for housing projects that could serve households between 80-100% AMI, which could be partially address by the flexibility of the Georgia PRO Housing opportunity.
- In the same survey, another community identified a barrier: “Lack of affordable housing due to landlords purchasing affordable homes with the intention of rental. The majority of our residents rent vs own. Many of these landlords also do not appropriately maintain their property and charge high rental rates.” With access to a flexible funding source, this

community could consider working with their housing authority, local land trust, or other partners to acquire the existing rental housing, maintain its quality, and offer it as affordable rental or provide another affordable ownership opportunity.

- Another community explained, “There are residents currently in public housing who are able to transition to low to moderate housing; however, there isn't enough housing stock available to them. We also have a large number of citizens that are unhoused. They don't live on the street, rather they move from place to place every 30-60 days.” However, this same community has not had a housing needs assessment or housing survey completed to quantify this issue for their community, which could be an effective first step in executing a plan to address this challenge and could be funded through the proposed Georgia PRO flexible grant.

DCA’s requirements for these funds will mirror the eligible activities as listed in the notice of funding (See Appendix A for proposed eligible/ineligible activities of this flexible fund). GICH Senior Year communities would have to demonstrate how their prospective use of the funds would identify and seek to remove one or more barriers to affordable housing production and preservation by showing that the activity would 1) further develop, evaluate, and implement housing policy plans, 2) improve existing or update their housing strategy, or 3) facilitate affordable housing production and preservation. To receive the funds, these communities would be required to:

- 1) Work with DCA and GICH Senior Year university, non-profit, and real estate partners through participating in planning, education, and technical assistance provided;
- 2) Provide advanced notice of what eligible activities they plan to finance and how this activity identifies or seeks to remove one or more barriers to affordable housing production and preservation;
- 3) Demonstrated how the proposed eligible activity aligns with their community’s housing plan and strategy;
- 4) Demonstrate how the proposed eligible activity would help achieve the national objective to benefit low and moderate income persons or households; and
- 5) Provide verification the funds were spent as planned and verification of compliance with all Federal and State laws, regulations, and executive orders.

DCA reserves the right to restrict Georgia PRO Flexible Grant funding based on whether GICH Senior Year communities have adequately planned and prepared for the activity and expense.

2. What is your geographic scope? (5 points)

DCA’s proposal will address local barriers to affordable housing in eight communities across the State of Georgia that are well-positioned to take action and possess local buy-in but need additional financial and technical assistance support to remove housing barriers and fully implement their plan. These eight communities will be chosen from a competitive pool of more than 62 GICH certified alumni communities, 16 of which are priority geographies (See the above Need section for more details). This statewide approach is strategic in its ability to serve a

variety of community sizes, geographies, and demographics, while creating a high potential for peer learning through action.

Between 2005 and 2023, there have been 96 communities selected for GICH, including 48 certified alumni, 34 non-certified alumni, and 14 current GICH communities. While the GICH program is open to any local municipality throughout the State of Georgia, GICH communities are selected through an annual competitive application process. GICH communities include a mix of rural areas, smaller metro areas, and communities within the larger Atlanta metro area. Each selected community must have demonstrated a well-articulated and significant need for affordable housing, local buy-in from decision-makers, a vision and a willingness to tackle that vision. The additional barriers to affordable housing each community faces upon graduating from GICH will be unique to that community and will require tailored assistance and flexible funding.

The maps below highlight participating GICH communities up to this date. All cities and counties in Georgia are eligible to apply for GICH. Figure H shows a map of all Certified GICH Alumni communities; these communities will be eligible to apply for GICH Senior Year and eight awardees will receive Georgia PRO funds. See section above for more information how the GICH and GICH Certified Alumni communities meet HUD’s Priority Geography criteria.

Figure G: Map of all GICH communities

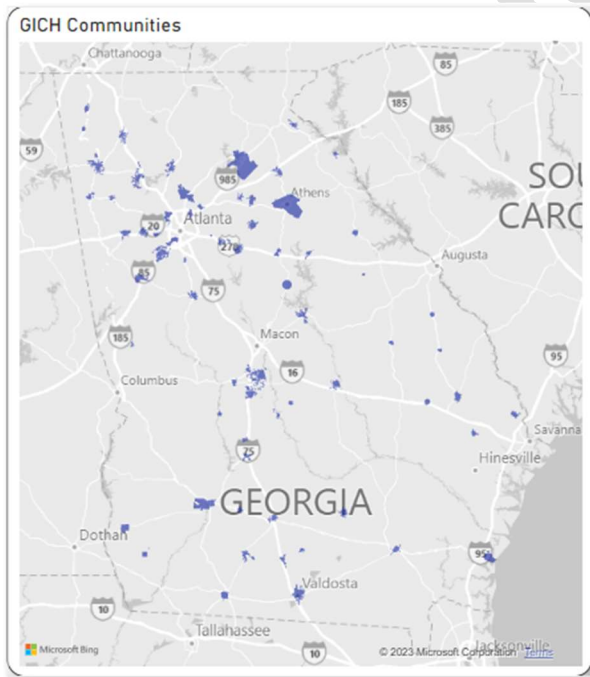
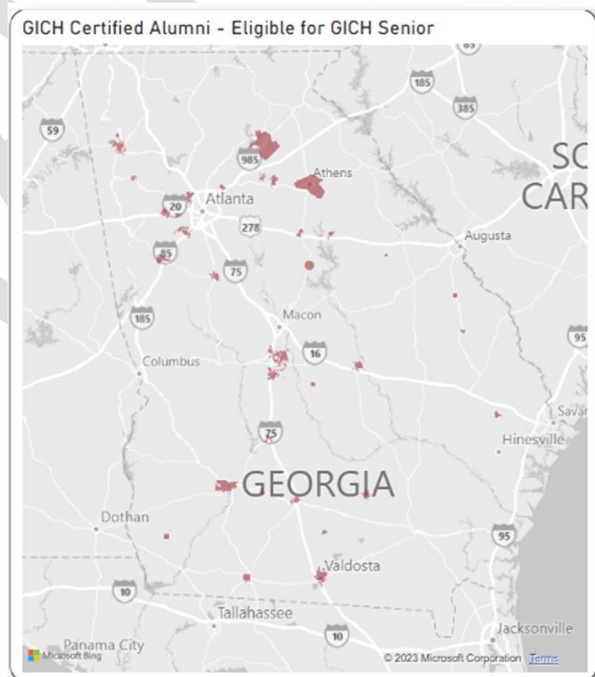


Figure H: Map of Certified GICH Alumni



3. Who are your key stakeholders? How are you engaging them? (5 points)

Outreach for Proposal

DCA staff have been planning the creation of GICH Senior Year since before the release of HUD PRO funding; thus, the timing of this release allowed our team to leverage previous conversations and to gather new stakeholder input to strengthen our proposal.

Recent Internal and External Stakeholder Input

- **Internal Stakeholders:** Since the release of the PRO NOFO, DCA has conducted internal outreach among program leads of all three housing divisions – Housing Finance and Development (Office of Community Housing – HOME, CHIP, NHTF, Rural Housing work, and others, and Office of Tax Credits), Housing Choice Voucher, and Homeless and Special Needs Housing. Our policy staff solicited input by email from division directors and facilitated a policy roundtable discussion with roughly 15 policy staff to seek input on the most urgent needs across housing divisions that could be met by this funding source. This group generated feedback that aligned strongly with existing efforts to create GICH Senior Year and supported the concept to provide a flexible funding resource for GICH communities. The policy team also met directly with directors within the Community Finance Division, which administers CDBG funds for the State of Georgia, as well as the leadership of DCA’s Office of Regional Community Services, which provides DCA support and representation directly to the twelve state regions who are responsible for providing support and resources to each of Georgia’s regional commissions, which assist local governments on a regional basis to develop promote, an coordinate implementation of effective comprehensive plans across the state. All of the above have expressed support for this proposal and contributed to the proposal’s concept for a flexible grant structure and to the larger GICH Senior Year framework.
- **GICH Administrators:** DCA staff met with UGA professors Jermaine Durham and Kim Skobba to discuss the GICH Senior proposal and seek input. These professors, with support from a graduate assistant, lead the programming for GICH, specifically application review and community selection, the coordination of team facilitation, technical assistance, and the semi-annual retreats. The GICH program team has expressed support for this proposal.
- **Georgia Municipal Association:** DCA discussed this effort with leadership at the Georgia Municipal Association, which plays an important sponsorship role in supporting GICH. GMA supports this proposal.
- **GICH teams:** All 92 GICH teams were surveyed by program administrators to identify existing barriers to affordable housing that they face; these teams represent the diversity of each community and include city leaders and elected officials, housing authority representatives, school system leaders, local developers, local community organizations, local business owners, and other residents. Responses to this survey are still being collected and will continue to inform the final list of eligible activities for GICH Senior funding awards. Thus far, more than 86 responses have been received and have informed the specific barriers that many GICH communities face.
- **Other HUD PRO Applicants:** DCA met individually with the City of Atlanta and the Atlanta Regional Commission to discuss each of our PRO funding proposals. The purpose was to discuss how to coordinate efforts, prevent overlap in our requests for

resources, and ensure Georgia communities benefit strongly from each application submitted to HUD.

Public Comment Period

The public comment period (October 4-19) for this proposal will generate additional feedback, culminating in a public hearing on October 20. The needs of Limited English Proficient persons will be considered by publishing a notice of DCA's intent to apply in Spanish. In addition to general public outreach sought through the website posting and social media, DCA will proactively reach out to the following groups for more specific feedback:

- **GICH teams:** The Fall GICH retreat occurs during our public comment period for the PRO grant. There will be dozens of GICH teams in attendance, including local elected officials, housing developers, community and economic development professionals, residents of affordable housing, service providers, and more. At this retreat, DCA staff will facilitate time to encourage participation in the public input survey and receive verbal feedback.
- **Affordable Housing Developers:** DCA plans to utilize an existing email list of affordable housing developers and property management companies to seek input on the proposal.
- **DCA Regional Representatives:** DCA will do direct outreach to the Regional Representatives through the DCA Office of Regional Community Services to spread the public input form around in communities they represent.
- **Georgia Municipal Association:** DCA will reach out directly to GMA leadership to seek input from their members on the proposal.
- **HOME-ARP stakeholders:** DCA publishes a monthly HOME-ARP newsletter to service providers, developers, and other stakeholders seeking HOME-ARP funds. The proposal will be included in this newsletter for feedback.
- **Balance of State Continuum of Care stakeholders:** DCA will reach out to service providers and existing organizations participating in the DCA-administered Continuum of Care to solicit their feedback on this proposal.
- **Housing Focused Community Organizations:** DCA will share the proposal with community-based groups, including Habitat for Humanity, Georgia Advancing Communities Together, Georgia Supportive Housing Association, Georgia Appleseed, and others to circulate amongst their membership for feedback.

Continued Outreach during Performance Period

DCA plans to seek continued input on the use of HUD PRO funds during the period of performance to ensure that funds are meeting community needs, are being distributed equitably, and are strengthening the overall effectiveness of the GICH Senior Year program. Input opportunities will include the following, at minimum:

- Semi-annual GICH retreat presentations from GICH Senior participants
- Regular communication with GICH program staff at UGA

- Regular communication between subgrantees (GICH Senior Year communities) and DCA program staff
- Monitoring and annual review of GICH Senior Year outcomes
- Annual surveys of GICH communities to continue to identify and track obstacles to creating and preserving affordable housing, as well as successful policy strategies to remove obstacles
- DCA will work closely with Georgia Regional Commissions to strengthen their role in providing technical assistance to GICH Senior communities within their jurisdictions. DCA’s primary GICH lead will be meeting individually with each of the Regional Commissions in January 2024, and GICH Senior Year communities will be required to include Regional Commissions in their housing teams or housing plan execution.

4. How does your proposal align with requirements to affirmatively further fair housing? (5 points)

In 2016, DCA published an [Analysis of Impediments to Fair Housing \(AI\)](#). The objective of the AI was to “research, analyze, and identify prospective impediments to fair housing choice throughout non-entitlement areas of the State. To ensure an accurate evaluation of current fair housing conditions, the AI includes a review of demographic and housing market data, relevant legislation, policies and practices affecting fair housing, public education and outreach efforts and direct community involvement through surveys, public forums, webinars and focus groups.”

Eleven statewide impediments were identified through the process, five of which had “Public Sector Implications, Suggested Actions, and Measurable Objectives.” Since GICH is a program based in the public sector and works primarily with local governments, GICH’s focus centers on the five impediments below.

Table 4: Georgia Public Sector Implications, Suggested Actions, and Measurable Objectives

Impediment	HUD PRO Proposal Benefit
Impediment 1: Limited presence of fair housing enforcement entities in rural Georgia.	GICH Senior Year flexible funding award eligible for use on fair housing planning
Impediment 2: Need for additional outreach and education.	GICH Senior Year fair housing module will educate local leaders on creating housing with fair housing framework
Impediment 3: NIMBYism and public policies used to limit access to affordable housing.	GICH education, capacity building, and HUD PRO financing for policy and planning activities combats NIMBYism and leads to local policy change promoting affordable housing
Impediment 4: Individuals with Housing Choice Vouchers (HCVs) predominately reside in high minority concentrated areas.	GICH Senior Year participants are expected to use data to understand their community’s demographic and socioeconomic composition and activate plans accordingly. GICH Senior Year flexible funding may be used for planning around policy changes that remove

	source of income barriers, as is identified as a priority for each GICH Senior Year community. This flexible funding source could also be used for development activities that would create more units that accept Housing Choice Vouchers in additional areas.
Impediment 5: Limited knowledge of fair housing law in rural areas of the state.	Most GICH communities eligible for GICH Senior Year awards are in rural geographies and will benefit from the fair housing technical assistance DCA will provide as part of the program.

As local experts, each GICH Senior community will address the unique impediments to affirmatively furthering fair housing that are identified locally. However, the 2016 AI revealed that there are significant obstacles to fair housing affecting all Georgia communities; thus, leveraging its wide geographic scope, GICH Senior Year should play an influential role in every community with which it partners. To proactively address the above five impediments, GICH Senior Year will establish competitive selection criteria based on the community’s demonstrated understanding of the socioeconomic and demographic composition of their communities and commitment to serving the whole community through targeting those most in need. For selected communities, GICH Senior Year will incorporate fair housing programming and funding flexibility to allow for local jurisdictions to go even further in tackling local impediments. Additionally, GICH programming already includes modules that educate local leaders on building community support for affordable housing. Below are proposed benefits that GICH Senior Year will provide to address impediments to fair housing.

Impediment 1: Limited presence of fair housing enforcement entities in rural Georgia.

The award each GICH Senior Year community will receive is designed with flexibility in mind. While the funding may not be used to create or fund fair housing enforcement agencies, GICH Senior communities may use the funding to conduct their own planning for affordable housing, in conjunction with a local assessment of fair housing, analysis of impediments, or an AFFH equity plan pursuant to the recent [HUD AFFH rule](#). Since HUD provides explicit technical assistance for AFFH planning, HUD PRO funds should not be the primary funding source for AFFH planning but should incorporate data and lessons from such planning.

Impediment 2: Need for additional outreach and education.

To address the need for additional education at the local level on fair housing, GICH Senior Year curriculum will include a module specifically focused on planning for affirmatively furthering fair housing and assessing local impediments to fair housing. This module will include education on existing fair housing enforcement agencies in Georgia and lead to better access of state resources. Through the DCA legal team, DCA has existing expertise and sufficient partnerships to provide quality technical assistance around this subject.

Impediment 3: NIMBYism and public policies used to limit access to affordable housing.

One of the strengths of the GICH program as it currently operates is the capacity building and learning opportunities on how to respond to and overcome local community opposition to affordable housing. For example, educational modules have included “Housing 101 and Overcoming Resistance” (2022), “Community Mobilization: Garnering Public Support” (2020), “A Case in Winning Public Support: City of Monroe” (2018), and others. GICH functions as a community of practice in that during each semi-annual retreat, alumni and current communities present on their successes and challenges and learn best practices from peer communities.

Impediment 4: Individuals with Housing Choice Vouchers (HCVs) predominately reside in high minority concentrated areas.

GICH Senior Year communities will be provided training on utilizing the AFFH mapping tool to identify areas of high concentration of HCVs and other public housing subsidies, as well as high minority concentration areas. Awardees will be encouraged to utilize this data to inform their funding request. Possible uses of the GICH Senior Year funding that would address high concentration of HCVs include: Developing proposals for policies that incentivize mixed-income development, such as the inclusion of affordable units in market rate properties; Expanding existing affordable housing incentive programs to wider geographies, including high-opportunity neighborhoods; Developing or updating housing plans that include strategies to address barriers for voucher holders; or others.

Impediment 5: Limited knowledge of fair housing law in rural areas of the state.

Because GICH has certified dozens of rural communities and emphasizes lower resourced, heavily impacted communities, GICH is natural structure to build local capacity and education in rural areas. GICH Senior will also ensure that four of the eight awarded GICH Senior Year communities are in rural areas. Thus, these rural areas will benefit from fair housing curriculum, planning and technical support, and the opportunity reduce impediments to fair housing using GICH Senior Year funds.

Utilizing AFFH Data

GICH Senior Year will encourage communities to incorporate the use of [AFFH data](#) in their local housing plans and in their implementation. Statewide AFFH data show, for example, that housing problems by race differ depending on the community. For example, in north Georgia mountain communities, which are predominantly white, black households experience high rates of housing problems. GICH communities will be encouraged to build takeaways from this data into their planning frameworks as they identify top barriers to housing affordability and take specific actions toward them. The GICH Senior Year application and selection process may also require demonstration of local AFFH trends.

CAPACITY (10 points)

1. What capacity do you and your Partner(s) have? What is your staffing plan? (10 points)

As discussed previously, the GICH program, including GICH Senior Year, is a partnership between the Georgia DCA, the University of Georgia, and the Georgia Municipal Association,

among other private partners. DCA is the state of Georgia's entity responsible for administering funds from the Department of Housing and Urban Development throughout the state, including the Community Development Block Grant and HOME and as such, DCA would lead the administration of this flexible grant source by utilizing the Department's existing infrastructure through the Community Finance Division.

The Community Finance Division (CFD) maintains accounting and grants management systems to support a multi-functional grants management program. The requisite financial controls in place to account for and properly manage the Housing PRO funds. These systems provide accurate, current, and complete disclosure of the financial status and meet all Federal and State requirements.

Additionally, DCA has existing policies and procedures to meet financial management requirements including, but not limited to, applicable regulations and requirements, financial accountability and records, authorized signatures for payments, requests for payment, bank accounts, escrow accounts, administrative costs, and audit requirements. The organizational structure includes risk management measures that establish clear lines of authority and approval, segregation of duties, and secure access to financial resources.

As administrators of Georgia's State CDBG program, the current staff members have experience with monitoring the expenditure rate of the State CDBG program. With DCA's State CDBG Program, DCA's Community Finance Division maintains detailed reports monitoring the expenditure of funds and project schedules. Additionally, a two-layer monitoring process is utilized. The first layer is in the field with the Field Service Representatives. The second layer is the program personnel in the DCA central office. The monitoring process begins with the original award of the grant to the sub-recipients. An on-site start up review is done by field service representatives prior to the release of any funds, as well as periodic on-site reviews during the life of the grant award and a final close-out review for an average of 5-6 site visits. In accordance with 24 CFR 570.489 (g), DCA has chosen to follow its own procurement policies and procedures for procurement of goods and services procured directly by DCA that is paid for in whole or in part with CDBG funds.

The GICH programmatic framework enables local communities to solve their own funding resources; in nesting this new resource within the GICH framework, DCA enables local jurisdictions and their leaders to effectively implement and finance reforms based on the individual community's unique leadership capacity and legal authority. Additionally, placing this new flexible grant within the existing DCA CDBG administrative function ensures that the flexible grant program will be successful. Both GICH and DCA CDBG are existing programs with proven track records of identifying partners with capacity and managing these relationships effectively through proper monitoring and internal controls. Moreover, DCA will follow the same practice as our existing CDBG program and require recipient entities to procure a private consultant or contract with a Regional Commission for grant writing administration services and housing advisor role prior to the submission of a funding application for the Georgia PRO Housing Grant; DCA considers this a threshold requirement to be eligible for the funds.

As research professors, University of Georgia GICH administrator Jermaine Durham and lead contributor Kim Skobba both conduct research that analyzing economic and racial housing and community disparities (see [Jermaine Durham CV](#) and [Kim Skobba CV](#)). As part of the GICH Senior Year application criteria, communities are required to demonstrate a willingness to use data to understand the socioeconomic and demographic composition of their communities and a commitment to serving all citizens, including those most in need. Utilizing Dr. Durham and Dr. Skobba's expertise and the expertise partners and DCA program experts, GICH Senior Year's initial programming will include technical assistance on implementing fair housing requirements (see more details above).

Below includes a summary of each entity's responsibilities in the GICH Senior Year program and the proposed would be responsibilities in the Georgia PRO Housing grant administration:

- Georgia Department of Community Affairs
 - Deputy Commissioner for Housing Assistance and Development's Policy Team: Austin Chancy (GICH Primary Liaison, GICH Senior Year Program Facilitator), John Stovall (GICH support and data analyst, HUD PRO application writer), Laura Ann Holland (GICH support, HUD PRO application writer)
 - Community Finance Division: Kimberly Carter (subject matter expert for GICH communities, lead Community Development Block Grant administrator)
 - Kathleen Vaughan and Glenn Misner (CDBG Administrators and Field Service Director; subject matter experts for GICH communities)
 - Pam Truitt and Malisa Thompson (CDBG Field Services and Compliance Manager and subject matter expert for GICH communities)
 - Housing Finance and Development Division: Tommy Lowmon (subject matter expert for GICH communities; division leader for housing finance programs)
 - Office of Community Housing: Samanta Carvalho (subject matter expert for GICH communities; office leader for CHIP program) and staff, including Shon Walker (subject matter expert on federal compliance for GICH communities)
 - Office of Housing Tax Credits: Mitch Kelly (subject matter expert for GICH communities; office leader for tax credit program), Meagan Cutler (subject matter expert for GICH communities; allocation manager for tax credit program)
 - Other DCA programs/staff to be leveraged for expertise and based on community need: DCA Deputy General Council Joseph Collins, Housing Choice Voucher Division Director Waquele Holley and staff, Housing Assistance Division Director Daphne Walker and staff, DCA Regional Representatives, DCA Geographic Information Systems staff, etc.
- University of Georgia (UGA)
 - Center for Housing and Community Research (formerly the Housing and Demographic Research Center): Dr. Jermaine Dupri (GICH Program Manager and UGA Professor), Elijah Humphries (GICH Graduate Program Assistant)

- College of Family and Consumer Sciences: Dr. Kim Skobba (GICH Professor In Kind support, Research)
- Georgia Municipal Association: Karen Van Duren (GICH Conference and Event planning support)

LEVERAGE (10 points)

1. Are you leveraging other funding or non-financial contributions? (10 points)

As a partnership, GICH programming, including GICH Senior Year programming, leverages non-financial contributions from all three program partners and other facilitators in the education and technical assistance offered. This includes staff time and support from each of the individuals listed in the section above and others.

For the new GICH Senior Year cohort members, DCA will coordinate access to existing financing tools, include several that DCA administers on behalf of HUD and some that the state provides. In addition to targeted education and technical assistance, GICH Senior Year cohort communities will receive the following financial resources for affordable housing development from DCA during their two-year term:

- Community HOME Investment Program (CHIP) Award: Either \$500,000 rehab or \$1,500,000 new construction
- Community Development Block Grant (CDBG) Award: Up to \$1 Million
- 9% Low Income Housing Tax Credit (LIHTC) Award: one set-aside tax credit award and 100% state match of that credit, whose average per development value is \$861,129⁵
- 4% LIHTC Award: one set-aside tax credit award and 100% state match of that credit, whose average per development value is \$1,197,302⁶
- Gap financing (NHTF, HOME, etc.), as needed and as available: ~\$4 million
- (if application is approved) Georgia PRO Flexible Grant: Up to \$1 million

In total, DCA will invest more than \$8 million in affordable housing resources into each GICH Senior Year community, including more than \$12 million in state tax credit equity for each community. Over the course of the HUD PRO grant term, the state's tax credit contribution to GICH Senior Year communities would total equity valued at more than \$96 million.

The Georgia PRO grant would enable DCA to further support the successful and timely execution of coordinating these federal and state financial resources.

LONG TERM EFFECT (10 points)

Expected Achievements During Performance Period

To date, GICH has graduated 92 cities and counties from the three-year cohort program and connected them with tens of millions of dollars in LIHTC, CDBG, and HOME (CHIP) funds,

⁵In Georgia, 9% LIHTC awards have an average total tax credit equity value of \$11,839,099, including federal tax credit equity value of \$7,541,651 and state matching tax credit equity value of \$4,294,448.

⁶In Georgia, 4% LIHTC awards have an average total tax credit equity value of \$19,976,517, including federal tax credit equity value is \$12,030,637 and state matching tax credit equity value is \$7,945,880.

resulting in thousands of affordable housing units being developed in GICH communities. With the addition of HUD PRO funding as a critical part of the new GICH Senior Year program, DCA will facilitate the following long-term impacts:

- The GICH Senior Year program will be fully established and operational, continuously improving through community feedback, seeking additional resources, and monitoring key grant outcomes. This strategic investment will have created a statewide infrastructure with a well-articulated model to remove local barriers to affordable housing.
- At least eight different communities throughout the state will have identified unique local barriers to creating and preserving affordable housing locally, developed a robust plan to address them, and utilized a total of \$8 million to fill strategic gaps or remove roadblocks to success.
 - Specifically, we anticipate the flexibility of the HUD PRO grant funding to demonstrate whether and how flexible funding opportunities will enhance community's ability to develop and effectively implement housing plans given the requirements and limitations of other state administered funding sources
- These eight communities are the poster children of a vibrant program that showcases the strategic formula of providing targeted, flexible funding along with technical assistance to communities that are motivated by the GICH curriculum.
- Georgia will experience a marked increase in local jurisdictions that include a Housing Element in their Comprehensive Plans.
- GICH and GICH Senior Year will have a snowball effect that exponentially compounds local affordable housing outcomes into regional and eventually statewide outcomes. The snowball effect comes from the cohort-based model which brings together dozens of similar and differing communities all working toward the same cause. Education being a critical public good, the multiplier effect of peer learning and DCA's infrastructure to host spaces, modules, retreats, and more, will continue to foster successful outcomes. The snowball effect compounds over time as well. As GICH Senior Year progresses over the next six years, outcomes from previous cohorts will lead to pathways and models for future cohorts.

Potential Roadblocks

Rather than address one local barrier to housing, this proposal builds up a long-term infrastructure for communities across the state to receive support in removing many local barriers to housing. Possible roadblocks to this might include:

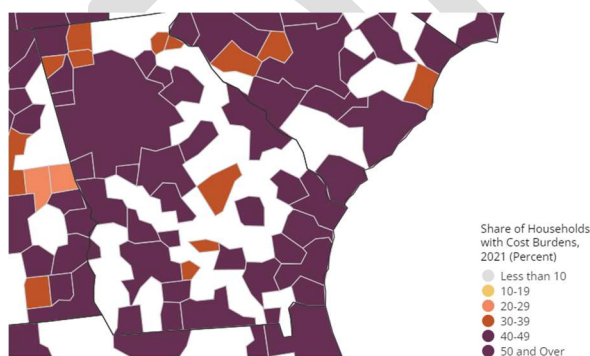
- GICH Senior Year communities will likely run up against state prohibitions on certain local ordinances.
 - Through targeted technical assistance and support in building local community buy-in for affordable housing, GICH Senior Year communities can address the problems they can locally and continue to educate local and state level leaders about the importance necessary state changes.

- Communities not selected for GICH Senior Year may feel frustrated by limited availability of spots. Inevitably, one or more communities may disagree with the selection criteria.
 - The GICH Senior Year program will be dedicated to continuous learning and improvement based on a wide variety of feedback and research to ensure that its selection criteria are fair and justified with key values and priorities.
 - Communities not selected for GICH Senior Year will still be able to apply through the competitive process for each funding opportunity and will be able to apply for future GICH Senior Year cohorts.
- Allowing local jurisdictions to select key barriers to address may result in disagreement in some situations about the prioritization of that barrier over another, including over how to use the HUD PRO flexible funding grant.
 - One of the key goals of the GICH Senior Year program is to facilitate and support local consensus building and action; a significant component of the required GICH Senior Year programming will be supporting communities as they overcome internal and public disagreements around removing affordable housing barriers.

Addressing Housing Cost Burden while Leveraging Community Amenities

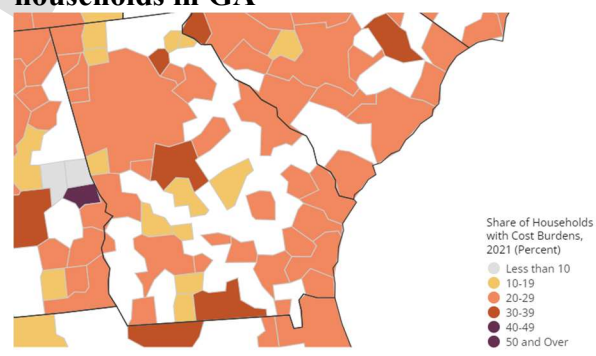
Housing cost burden is a key metric in local housing planning, and reducing it is a critical marker of success in addressing the housing crisis. In more than 13 metropolitan statistical areas in Georgia, more than 30% of residents are cost burdened, according to [Harvard JCHS](#). Renters are particularly burdened by housing costs; in dozens of metro areas across the state, more than half of renters are cost burdened. Further, more than 77% of extremely low income renters in Georgia are severely rent burdened, according to the [National Low Income Housing Coalition](#).

Figure J: Rent burdened households in GA



Source: Harvard JCHS

Figure K: Severely rent burdened households in GA



Source: Harvard JCHS

Local plans should incorporate data on cost burden as well as other key data that point to housing insecurity. As part of their Comprehensive Plan, HUD entitlement communities are required to create a Housing Element, which typically incorporates the Consolidated Plan. The Consolidated Plan identifies the number of cost burdened households within each community, among other key information like barriers to affordable housing. There is no additional Georgia state law requiring non-entitlement communities to include a Housing Element in their planning processes.

Many do not; therefore, GICH has historically played a key role in encouraging local municipalities to go beyond the minimum planning requirements and begin to include housing strategies in their community's planning processes.

One of the primary ways to reduce housing cost burden for renters and owners is to develop housing that is affordable to the residents living there, while planning for future growth. Georgia's main strategy for doing this is through the Georgia Housing Tax Credit. This Housing Tax Credit is a combination of federally allocated LIHTC and 100% state tax credit match. Georgia allocates roughly \$30 million annually for the housing tax credit, leveraging as much in federal LIHTC dollars. Although LIHTC rents are not tied to the incomes of the tenants, they are significantly more affordable to people earning 80% AMI or less. Many of the units leverage additional funding sources like HOME, NHTF, and project-based vouchers or other types of project-based rental assistance, which further restrict the allowable rents and reduce housing cost burden.

Communities that go through the GICH Senior Year program receive tangible resources made available to them that will help reduce cost burden for their residents, including:

- A set-aside 9% Low Income Housing Tax Credits allocation
- A set-aside 4% Low Income Housing Tax Credit allocation
- A Community HOME Investment Program (CHIP) grant
- A Community Development Block Grant, and
- (If this grant application is approved) A Georgia PRO Housing flexible grant.

Each of these dedicated resources will contribute directly to the creation and preservation of the income-restricted housing stock in each of the eight selected communities. In addition, the Qualified Allocation Plan for LIHTC developments provides extra competitive points to projects that can demonstrate:

- Community Transportation Options (up to 6 points)
- Quality Education Areas (up to 3 points)
- Desirable activities (up to 20 points)

This means that LIHTC projects in each GICH community will be expected to meet these standards, while providing affordable housing to low-income households.

Additionally, incorporating a Housing Element into the Comprehensive Plan, as GICH communities are expected to do, ensures that housing is planned for along with the other community amenities like transportation, education, and parks.

Replicating the GICH/GICH Senior Year Model

The GICH program as it exists is a unique and successful model. GICH brings together cohorts of communities across the state to learn about affordable housing strategies and tools, while connecting them to DCA resources like LIHTC, CHIP, and CDBG. This program has existed in Georgia for nearly 20 years and has produced thousands of affordable homes. The compounding

“snowball effect” of GICH has magnified its impact throughout the state. Over time, more and more communities have applied, and selection has become more competitive.

GICH Senior Year will further strengthen this highly successful model by creating three new benefits: a) Targeted technical assistance, b) Dedicated set-aside resources to align the development of affordable housing, and c) A flexible funding source of up to \$1 million to remove locally identified barriers to housing (if this application is approved).

This model can be replicated in any state or region in which there is:

- One primary housing finance agency that administers housing development financing and other housing assistance, or significant collaboration across agencies to the same effect
- A lead educational partner such as a university with faculty to coordinate and implement curriculum, or a nonprofit with significant housing policy expertise
- A variety of experts willing to lead workshops and modules on key housing resources and strategies
- A desire at both the local and the state level to build capacity and a commitment to overcome local housing barriers

The GICH program is designed around peer learning, and the team would support any opportunity to share best practices and expand the model to other areas.

Environmental Risks & Resilience

This proposal will include partnerships with eight unique communities. Depending on the community, different environmental risks present themselves. Coastal Georgia communities, for example, may experience flooding, high winds, storm surge, sea level rise, erosion and power outages from hurricanes and tropical storms. Other parts of Georgia experience severe thunderstorms and tornadoes, which bring heavy rains and winds and power outages. In most parts of the state, severe heat can be deadly for residents, including in residential buildings. Each of these hazards can cause injury, illness and death and displace residents; interrupt public services; and damage buildings and infrastructure. Each new affordable housing project facilitated through this proposal will require a review of potential environmental hazards or challenges. For LIHTC projects, all projects must conduct an environmental site assessment, including investigating the following:

- a) Wetland. b) State waters/streams/buffers & setbacks. c) Flood Plains/Floodways. d) Endangered species. e) Noise. f) Radon gas. g) Asbestos. h) Lead. i) Water leaks/mold/microbial growth j) Vapor intrusion. k) Historic preservation. l) Other hazards and considerations.

Additionally, HOME funded projects, which include CHIP funds, and CDBG funded projects, require a NEPA review.

To address the climate-related risks associated with each specific community, DCA will encourage GICH Senior Year communities to consult the HUD Community Resilience Toolkit for solutions. For example:

- Communities experiencing regular episodes of extreme heat may choose to incorporate into their planning an inventory of buildings and infrastructure that are particularly vulnerable to extreme heat; rehabilitate older multifamily buildings using low-income housing tax credits to include more energy efficient materials and appliances; plan to reduce heat island effects by planning affordable housing projects near green spaces; other strategies.

As part of the regular GICH curriculum, participants attend modules focused on the intersection between housing and climate resilience, including “Building Resiliency – Connected Resilient Communities Program” (2022) and “Energy Efficiency” (2017). Takeaways from the curriculum are intended to be incorporated into local housing plans. These can be coupled with strategies from the HUD Community Resilience Toolkit to promote community resilience.

Goals and Signs of Success

Rather than tackling one specific barrier to affordable housing, this proposal leverages existing state, federal, and local capacity and resources to bring together housing financing, flexible funding, and targeted technical assistance to remove a number of barriers allowable under the HUD PRO guidelines. Since each of the yet-to-be selected eight communities will identify different barriers to affordable housing, this proposal cannot set specific metrics for each of them. However, this proposal’s strength lies in its collaborative structure and its ability to funnel many resources into a single community. Success will be determined at the program level through the goals below:

Goals: GICH Senior Year Program, including the Georgia PRO Flexible Grant

- Goal 1: Steadily increase the number of communities strategically combining all available state resources for affordable housing
 - Target outcome: 8 communities have applied for, have been awarded, and have used each available state resource by 2029
 - Target outcome: 8 communities have increased the number of affordable homes in their communities
 - Target outcome: 8 communities have been trained on Affirmatively Furthering Fair Housing
- Goal 2: All communities have identified and made significant strides to reduce major local barriers to housing (Georgia PRO Flexible Grant)
 - Target outcome: 8 communities submitted complete request for funding identifying at least one critical barrier locally
 - Target outcome: 8 communities developed a GICH-approved plan to remove at least one housing barrier
 - Target outcome: 8 communities have overcome at least one local barrier to producing or preserving affordable housing
 - Target outcome: 8 communities provide annual updates on progress in implementing the plan to remove housing barriers

- Goal 3: DCA develops and publicly shares a playbook of best practices for local communities to strategically coordinate all available resources and remove local barriers to affordable housing.
 - Target outcome: DCA works with GICH partners to collate information from 8 participating communities.
 - Target outcome: DCA publishes program impact report.
 - Target outcome: 8 participating communities share about their successful experiences with removing local barriers through participating in this program at DCA provided public forums, such as the DCA Annual Conference, the GICH Retreats, and others.

Long-term effect for vulnerable populations

Through this proposal, DCA is committed to supporting local communities in tackling their most pressing housing challenges. GICH Senior Year communities will be selected from the pool of GICH Certified Alumni based on quality applications that highlight 1) the previous success and effectiveness of their housing team, 2) existing personnel and team infrastructure to successfully tackle an outstanding action plan, 3) demonstrated understanding of the socioeconomic and demographic composition of their communities and commitment to serving the whole community through *targeting those most in need*, and 4) remaining barriers to implement their communities housing plans including remaining financing needs.

In selecting communities based on the above criteria, expanding opportunities for people in protected classes and vulnerable populations is a high priority. Once selected, the three principal interventions of GICH Senior Year will lead to key long-term effects that promote housing access for all, particularly those most impacted by housing insecurity.

- Dedicated state resources: GICH Senior Year communities will be eligible to receive LIHTC, CHIP, and CDBG funding set-asides. Because communities with high concentrations of poverty historically experience low investment levels, DCA can use the GICH selection process to ensure that state resources are being equitably invested throughout the state, including in rural and urban areas, as well as areas with high minority populations.
 - Long-term effect: GICH Senior Year communities will have undergone key trainings on building community support, leveraging AFFH data and trainings, and will have developed a local housing plan. The pairing of state funding set-asides will ensure tangible housing units are being developed in the competitively selected communities that demonstrate the highest need.
- Targeted technical assistance: Technical assistance will include support on accessing and utilizing key AFFH data and incorporating that data into local housing plans.
 - Long-term effect: This will set a precedent for housing plans across the state. As more communities integrate AFFH data into their plans, more solutions will come

from a framework of furthering fair housing. With each class, more and more Georgia communities will standardize fair housing planning in their housing plans.

- Flexible funding: GICH provides education modules focused on Zoning, Missing Middle housing, NIMBYism, Tenant Protections, Heirs Property law, and others to educate teams on the legacy of exclusion of people of protected classes in housing. The flexible funding provided through Georgia PRO is intended to facilitate action on plans designed from this information.
 - Long-term effect: Georgia will have funded the removal of eight projects removing local housing barriers, informed by the data and stories of people most impacted by housing insecurity. In ten years, Georgia will essentially have a playbook on removing a variety of local barriers, including undoing exclusionary zoning, building community momentum for housing, and empowering low-resource communities to access all the funds available to them.

Appendix A: Proposed Eligible/Ineligible Activities for Georgia PRO Housing Grant

Eligible Activities	Ineligible Activities
<p>Planning and policy activities supporting affordable housing:</p>	<p>Any activity that does not meet a national objective, as applicable.</p>
<p>Developing or updating housing plans, community development strategies, and zoning and land use policies to simplify, streamline, or change overlays that create a barrier to affordable housing development or preservation, such as architectural review or historic preservation overlays</p>	<p>Any activity that is not eligible under section 105(a) of the Housing and Community Development Act of 1974, applicable implementing regulations, and this NOFO unless a waiver is obtained from HUD</p>
<p>Developing or updating housing plans, community development strategies, and zoning and land use policies such as overlays to encourage multifamily and mixed-use development or access to affordable housing, floating zones (such as redevelopment, workforce housing, or live/work zones in high opportunity areas), incentive zoning, transit-oriented development zones, or ordinances to encourage housing development or preservation</p>	<p>Any activity that is not in compliance with applicable fair housing, nondiscrimination, labor standards, and environmental review requirements.</p>
<p>Developing proposals for new by-right permitting procedures to streamline affordable housing development and reduce discretionary approvals</p>	<p>Any activity carried out on or before the date of the letter announcing the award of the grant, except that you may use grant funds, should you receive an award, to reimburse PRO Housing eligible costs of grant application preparation, including planning and public outreach activities. Note that a CDBG grantee may choose to use annual CDBG funds to assist in applying for other federal grant programs if the grantee certifies that the program would meet local community development objectives, including under this NOFO.</p>
<p>Developing new incentive programs for affordable housing development</p>	<p>Any activity to carry out the regular responsibilities of the unit of general local government or for buildings or portions thereof used for the general conduct of government. Applicants should plan their approaches accordingly to ensure that PRO Housing award funds are not used for such costs. Grantees may and are encouraged to use leverage funding for such unallowable costs</p>
<p>Expanding existing affordable housing incentive programs to wider geographies,</p>	<p>Any activity that results in a net decrease in allowable or actual housing construction.</p>

<p>including high-opportunity neighborhoods</p>	<p>Rezoning efforts and development activities must ensure a net increase in zoned capacity or number of homes, respectively, to be considered for funding. HUD will not consider upzoning efforts which are accompanied by downzoning elsewhere, or managed retreat projects or development activities if they will not result in an increase in affordable housing units. HUD may make an exception to this requirement for a relocation or buyout program that is identified as a strategy for mitigation from an environmental or natural hazard (e.g., flood prevention, remediation from contaminants).</p>
<p>Developing proposals to reduce or eliminate requirements related to parking, building height, lot coverage, setbacks, minimum unit size, minimum lot size, floor area ratio, and other common land use controls</p>	
<p>Establishing incentive programs or flexibilities to enable and promote the adaptive reuse of vacant or underutilized properties for housing or mixed-use development</p>	
<p>Developing proposals to streamline and modernize local permit processing, such as by enabling one-stop or parallel-process permitting</p>	
<p>Developing proposals to streamline or eliminate requirements that unduly delay the permitting process or establish unreasonable thresholds for approvals, such as duplicative and burdensome hearings and documentation for variances, rezonings, or similar planning approvals</p>	
<p>Developing proposals to rezone to allow multifamily or mixed-use development including housing in office, commercial, and light industrial zones</p>	
<p>Developing proposals to expedite approvals for affordable housing development that meets certain criteria</p>	
<p>Developing proposals for higher-density zoning for current single-family and multifamily zones, including rezones to allow duplexes, triplexes, or fourplexes byright in all areas zoned primarily for single-family homes</p>	

and encourage property owners to ensure that any infill development improves or maintains walkability	
Establishing incentive programs, designing pre-approved floorplans, or introducing more flexible zoning to enable and promote accessory dwelling units	
Developing proposals to replace discretionary design review procedures with objective design and development standards	
Developing proposals to eliminate restrictions on lower-cost housing types such as prefabricated or manufactured homes	
Developing proposals to update zoning or incentives to facilitate affordable housing on land owned by faith-based organizations	
Developing proposals to restructure fee schedules to eliminate burdensome costs for affordable housing development	
Creating affordable housing planning resources for member jurisdictions	
Developing regional planning models that enhance location efficiency by focusing on connecting housing, transportation, and economic growth	
Providing affordable housing developers a first look at tax sale properties and other government properties	
Developing proposals to eliminate, subsidize, waive, or otherwise reduce fees or other costs of property subdivision that may discourage the construction of affordable housing	
Developing proposals for policies that incentivize mixed-income development, such as the inclusion of affordable units in market rate properties	
Developing proposals to reform building codes, including through adopting or modifying model codes or consensus standards, to facilitate more affordable housing or otherwise reduce construction costs	
Developing proposals to harmonize land-use policies or building codes among adjoining municipalities and facilitate consistent regional development standards that streamline housing development	

Development activities	
Financing the construction or rehabilitation of affordable housing	
Acquisition or disposition of land or real property for the development of affordable housing	
Facilitating the conversion of commercial or other properties to new housing	
Establishing or assisting a community development financial institution (CDFI) to carry out financing strategies	
Providing large-scale technical assistance to affordable or non-profit developers, community land trusts, or other entities which leads to the development of affordable housing	
Infrastructure activities	
Installing new utilities and/or infrastructure improvements necessary for the development or preservation of affordable housing	
Upgrading existing utilities or improvements to increase an area's overall capacity for new housing	
Establishing tax-increment financing districts to fund infrastructure improvements or affordable housing development, especially those that incentivize affordable housing development	
Increasing community resilience by investing in infrastructure improvements and nature-based solutions to mitigate the impacts of disasters, natural hazards, and extreme weather (such as flood walls, green stormwater management systems, landscaping to reduce heat islands, and elevating existing structures), for the preservation of affordable housing and to make areas suitable for new affordable housing investment.	
Investing in neighborhood amenities that benefit low-and-moderate income residents such as parks, community centers, bike lanes and improvements to the physical environment that increase public safety such as streetlights or sidewalks	
Preservation Activities	
Acquisition or subsidization of at-risk housing	

for the purpose of preserving affordability	
Establishing loan or grant programs with affordability requirements or other mechanisms for rehabilitation of existing affordable housing units	
Creating anti-displacement policies and prevention measures, such as limitations on property tax increases for low-income homeowners near new development, ensuring the affordability of new developments, and relocation assistance	
Creating a right of first refusal and creating associated resources for tenants at risk of displacement	
Incentivizing replacement of affordable units for new construction	
Capacity building for non-profit entities seeking to pool resources, engage landlords regionally, work more cooperatively, undertake joint housing rehabilitation programs, or merge operations	
Establishing an affordable housing preservation seed fund	
Adaptive reuse of historic or commercial properties with minimum affordable housing requirements/set-asides.	
Supporting shared housing through actions such as revising local occupancy regulations, rehabilitating units, establishing resident-matching programs, or similar activities	
Creating an implementation plan to freeze property tax assessments for LMI homeowners (except that the grant may not be used to pay the balance)	
Providing technical assistance to community land trusts or other entities which leads to the preservation of affordable housing	
Providing homebuyer education, assistance, appraisal programs, and other educational programs for LMI residents	
Preserving affordable housing in segregated, high poverty neighborhoods as part of a larger revitalization plan which improves conditions and eliminates disparities in access to opportunity between residents	

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