

BOC Meeting Date  
10/07/2020**Requesting Agency**

Community Development

**Commission Districts Affected**

All Districts

**Requested Action** *(Identify appropriate Action or Motion, purpose, cost, timeframe, etc.)*

Request approval of a Resolution to amend the 2020-2024 proposed Consolidated Plan and the 2020 Annual Action Plan to seek certain waivers from the U.S. Department of Housing and Urban Development and to secure federal funds supporting projects and services needed by its low- and moderate-income citizens for activities. The 2020 allocations are as follows: Community Development Block Grant (CDBG) is \$1,867,525, Emergency Solution Grants (ESG) is \$166,641, and HOME Investment Partnership Program (HOME) is \$877,448. The ESG and HOME grants require an annual match of 100% and 25%, respectively.

**Requirement for Board Action** *(Cite specific Board policy, statute or code requirement)*

The Code of Georgia 36-10-1 states that all official contracts entered into by the County governing authority with other persons on behalf of the County shall be in writing and entered in its minutes. This is a new allocation that will require a new unit to be established.

**Is this Item related to a Strategic Priority Area?** *(If yes, note strategic priority area below)*

Yes          Health and Human Services

**Is this a purchasing item?**

No

**Summary & Background***(First sentence includes Agency recommendation. Provide an executive summary of the action that gives an overview of the relevant details for the item.)***Scope of Work:**

On April 10, 2020, a memorandum from the United States Department of Housing and Urban Development (HUD) provided guidance on the necessary statutory suspensions and regulatory waivers to enable HOME participating jurisdictions (PJs) affected by the Coronavirus Disease 2019 (COVID-19) pandemic to use HOME funds to address immediate housing needs and to help prevent the spread of the virus. And on August 4, 2020, the Department of Community Development submitted a request to HUD to waive the 2020 mandatory 15% (\$131,617) Community Housing Development Organizations (CHDOs) HOME set-aside that was included in the July 8, 2020, approved 2020-2024 Consolidated Plan and 2020 Action Plan.

**Community Impact:** The HUD waiver will provide the Department with the flexibility to provide additional funds to the Owner Occupied Housing Rehabilitation, Home Ownership, and Tenant-Based Rental Assistance programs.

**Department Recommendation:** Approve the amendment to the 2020-2024 Consolidated Plan

**Agency Director Approval****County Manager's Approval**

Typed Name and Title

Phone

Signature

Date

<p>and the 2020 Action Plan.</p> <p>Project Implications: N/A</p> <p>Community Issues/Concerns: N/A</p> <p>Department Issues/Concerns: The submission and subsequent approval of the updated 2020-2024 Consolidated Plan and 2020 Action Plan will ensure Fulton County’s continued annual allocation of CDBG, ESG, and HOME grants.</p> <p>History of BOC Agenda Item: BOC Agenda Item #20-0478</p>	
<b>Contract &amp; Compliance Information</b>	<i>(Provide Contractor and Subcontractor details.)</i>

Agency Director Approval		County Manager's Approval
Typed Name and Title	Phone	
Signature	Date	

Revised 03/12/09 (Previous versions are obsolete)

# 20-0671

<b>Solicitation Information</b>	<b>NON-MFBE</b>	<b>MBE</b>	<b>FBE</b>	<b>TOTAL</b>
No. Bid Notices Sent:				
No. Bids Received:				
<b>Total Contract Value</b>	.			
<b>Total M/FBE Values</b>	.			
<b>Total Prime Value</b>	.			
<b>Fiscal Impact / Funding Source</b>		<i>(Include projected cost, approved budget amount and account number, source of funds, and any future funding requirements.)</i>		
.ESG annual grant match requirement				
<b>Exhibits Attached</b>		<i>(Provide copies of originals, number exhibits consecutively, and label all exhibits in the upper right corner.)</i>		
Amended 2020-2024 Consolidated Plan and 2020 Action Plan BOC Resolution				
<b>Source of Additional Information</b>		<i>(Type Name, Title, Agency and Phone)</i>		
Dawn Butler, Division Manager, Department of Community Development, and 404-808-4150				

<b>Agency Director Approval</b>		<b>County Manager's Approval</b>
<b>Typed Name and Title</b>	<b>Phone</b>	
<b>Signature</b>	<b>Date</b>	

Revised 03/12/09 (Previous versions are obsolete)

Continued

**Procurement**

<b>Contract Attached:</b> .	<b>Previous Contracts:</b> .		
<b>Solicitation Number:</b> .	<b>Submitting Agency:</b> .	<b>Staff Contact:</b> .	<b>Contact Phone:</b> .

**Description:.****FINANCIAL SUMMARY**

<b>Total Contract Value:</b>	<b>MBE/FBE Participation:</b>
Original Approved Amount: .	Amount: . %: .
Previous Adjustments: .	Amount: . %: .
This Request: .	Amount: . %: .
TOTAL: .	Amount: . %: .

**Grant Information Summary:**

Amount Requested: .	<input type="checkbox"/>	Cash
Match Required: .	<input type="checkbox"/>	In-Kind
Start Date: .	<input type="checkbox"/>	Approval to Award
End Date: .	<input type="checkbox"/>	Apply & Accept
Match Account \$: .		

<b>Funding Line 1:</b> .	<b>Funding Line 2:</b> .	<b>Funding Line 3:</b> .	<b>Funding Line 4:</b> .
-----------------------------	-----------------------------	-----------------------------	-----------------------------

**KEY CONTRACT TERMS**

<b>Start Date:</b> .	<b>End Date:</b> .
<b>Cost Adjustment:</b> .	<b>Renewal/Extension Terms:</b> .

**ROUTING & APPROVALS**

(Do not edit below this line)

X	Originating Department:	Butler, Dawn	Date: 9/29/2020
X	County Attorney:	Stewart, Denva	Date: 9/29/2020
.	Purchasing/Contract Compliance:	.	Date: .
.	Finance/Budget Analyst/Grants Admin:	.	Date: .
.	Grants Management:	.	Date: .
X	County Manager:	Gillespie, Alana	Date: 9/29/2020



# 2020-2024 Consolidated Plan and 2020 Annual Action Plan

**DRAFT**  
**August 2020**

*This page intentionally left blank.*

# FIVE-YEAR CONSOLIDATED PLAN

---

For Program Years 2020 to 2024

# ANNUAL ACTION PLAN

---

For Program Year 2020

# FULTON COUNTY, GEORGIA

---

Department of Community Development

DRAFT – August 2020

Prepared for Fulton County by  
Mosaic Community Planning, LLC





*This page intentionally left blank.*

# TABLE OF CONTENTS

## 2020-2024 Five-Year Consolidated Plan Sections

<b>Executive Summary.....</b>	<b>7</b>
ES-05 Executive Summary – 24 CFR 91.200(c), 91.220(b) .....	7
<b>The Process.....</b>	<b>10</b>
PR-05 Lead & Responsible Agencies 24 CFR 91.200(b) .....	10
PR-10 Consultation – 91.100, 91.200(b), 91.215(l) .....	11
PR-15 Citizen Participation.....	22
<b>Needs Assessment .....</b>	<b>32</b>
NA-05 Overview .....	32
NA-10 Housing Needs Assessment – 24 CFR 91.205 (a, b, c) .....	32
NA-15 Disproportionately Greater Need: Housing Problems – 91.205 (b)(2) .....	43
NA-20 Disproportionately Greater Need: Severe Housing Problems – 91.205 (b)(2) .....	46
NA-25 Disproportionately Greater Need: Housing Cost Burdens – 91.205 (b)(2) .....	50
NA-30 Disproportionately Greater Need: Discussion – 91.205(b)(2) .....	51
NA-35 Public Housing – 91.205(b).....	52
NA-40 Homeless Needs Assessment – 91.205(c) .....	58
NA-45 Non-Homeless Special Needs Assessment – 91.205 (b,d) .....	62
NA-50 Non-Housing Community Development Needs – 91.215 (f) .....	66
<b>Housing Market Analysis.....</b>	<b>74</b>
MA-05 Overview .....	74
MA-10 Number of Housing Units – 91.210(a)&(b)(2) .....	74
MA-15 Housing Market Analysis: Cost of Housing – 91.210(a) .....	78
MA-20 Housing Market Analysis: Condition of Housing – 91.210(a).....	81
MA-25 Public and Assisted Housing – 91.210(b).....	84
MA-30 Homeless Facilities and Services – 91.210(c).....	87
MA-35 Special Needs Facilities and Services – 91.210(d).....	91
MA-40 Barriers to Affordable Housing – 91.210(e) .....	93
MA-45 Non-Housing Community Development Assets – 91.215 (f) .....	93
MA-50 Needs and Market Analysis Discussion .....	102
MA-60 Broadband Needs of Housing occupied by Low- and Moderate-Income Households - 91.210(a)(4), 91.310(a)(2) .....	108
MA-65 Hazard Mitigation - 91.210(a)(5), 91.310(a)(3) .....	112

<b>Strategic Plan.....</b>	<b>114</b>
SP-05 Overview .....	114
SP-10 Geographic Priorities – 91.215 (a)(1) .....	114
SP-25 Priority Needs – 91.215(a)(2) .....	115
SP-30 Influence of Market Conditions – 91.215 (b) .....	121
SP-35 Anticipated Resources – 91.215(a)(4), 91.220(c) (1,2) .....	122
SP-40 Institutional Delivery Structure – 91.215(k) .....	124
SP-45 Goals Summary – 91.215(a)(4) .....	130
SP-50 Public Housing Accessibility and Involvement – 91.215(c) .....	132
SP-55 Barriers to affordable housing – 91.215(h) .....	133
SP-60 Homelessness Strategy – 91.215(d) .....	134
SP-65 Lead based paint Hazards – 91.215(i) .....	135
SP-70 Anti-Poverty Strategy – 91.215(j) .....	136
SP-80 Monitoring – 91.230 .....	138

## 2020 Annual Action Plan Sections

<b>Expected Resources .....</b>	<b>141</b>
AP-15 Expected Resources – 91.220(c) (1,2) .....	141
<b>Annual Goals and Objectives .....</b>	<b>144</b>
AP-20 Annual Goals and Objectives .....	144
<b>Projects .....</b>	<b>146</b>
AP-35 Projects – 91.220(d) .....	146
AP-38 Project Summary .....	147
AP-50 Geographic Distribution – 91.220(f) .....	153
<b>Affordable Housing .....</b>	<b>154</b>
AP-55 Affordable Housing – 91.220(g) .....	154
AP-60 Public Housing – 91.220(h) .....	154
AP-65 Homeless and Other Special Needs Activities – 91.220(i) .....	155
AP-75 Barriers to affordable housing – 91.220(j) .....	157
AP-85 Other Actions – 91.220(k) .....	157
<b>Program Specific Requirements .....</b>	<b>160</b>
AP-90 Program Specific Requirements – 91.220(l) (1,2,4) .....	160

# 2019-2023 Five-Year Consolidated Plan

**DRAFT**  
**August 2020**

*This page intentionally left blank.*

# EXECUTIVE SUMMARY

## ES-05 EXECUTIVE SUMMARY – 24 CFR 91.200(C), 91.220(B)

### 1. Introduction

Fulton County's 2020-2024 Five-Year Consolidated Plan is a comprehensive planning document outlining a coordinated approach to housing, community development, and homeless needs using U.S Department of Housing and Urban Development (HUD) grant funds. It provides guidance on the investment of HUD dollars and outlines priorities for using the County's Community Development Block Grant (CDBG), Home Investment Partnerships (HOME), and Emergency Solutions Grant (ESG) funds over the next five years. It covers the Fulton County entitlement jurisdiction, which includes unincorporated Fulton County and the cities of Alpharetta, Chattahoochee Hills, College Park, East Point, Fairburn, Hapeville, Milton, Mountain Park, Palmetto, and Union City.

Every year, the County will produce an Annual Action Plan to detail specific activities to carry out the Five-Year Consolidated Plan's priorities and goals. Fulton County's 2020 Annual Action Plan is included with this Consolidated Plan.

### 2. Summary of Objectives and Outcomes Identified in the Plan Needs Assessment Overview

Priority needs were developed based on community participation, stakeholder consultation, Census Bureau and other data, and an analysis of top housing, homeless, special needs, and non-housing community development needs in the Fulton County entitlement jurisdiction. They include:

#### *Develop and Preserve Affordable Rental Housing*

- Support the development of rental housing affordable to low- and moderate-income households, including projects located near employment, transportation, and other community resources.
- As economically feasible, consider possible opportunities to extend the useful life of existing affordable rental housing by funding acquisition and/or rehabilitation activities.
- Support the development of affordable rental housing for seniors, veterans, people with disabilities, or other special needs households, such as people who are formerly homeless or at risk of homelessness.

#### *Affordable Homeownership Opportunities*

- Support development of for-sale housing units affordable to low- and moderate-income households, including homes located near employment, transportation, or other community resources.
- Increase the number of first-time homebuyers through down payment and closing cost assistance.
- Encourage agencies to develop affordable for-sale housing that is accessible to people with disabilities.

## *Housing Rehabilitation Assistance for Homeowners*

- Preserve the existing affordable housing stock by assisting income-eligible homeowners with housing rehabilitation and repairs, with an emphasis on housing problems affecting health and safety.

## *Rental Assistance, Homelessness Prevention, and Rapid Rehousing*

- Assist income-eligible renter households with tenant-based rental assistance.
- Collaborate with agencies in the Continuum of Care (CoC) and others to assist households at-risk of homelessness with short-term rental payments, utility assistance, rapid rehousing, or other assistance.
- Collaborate with agencies in the CoC and others to assist people who are homeless through provision of and access to emergency, transitional, and permanent housing to enable them to move to appropriate housing and achieve greater stability.

## *Public Services*

- Fund eligible public services to serve low- and moderate-income residents, youth, seniors, people with disabilities, and other special needs populations.

## *Supportive Services for Homeless Individuals and Families*

- Collaborate with agencies in the CoC and others to provide coordinated supportive services and case management to people experiencing homelessness to support moves to appropriate housing and greater stability.

## *Fair Housing Education and Enforcement*

- Provide assistance to eligible households which might include but is not limited to:
  - Fair housing education services to help residents, community organizations, and housing providers understand fair housing rights and responsibilities.
  - Provide fair housing complaint investigation services.
  - Consumer education and awareness around predatory lending fraudulent mortgages, and other housing scams.

## *Community Improvements*

- Work with other County departments, cooperating cities within Fulton County, and non-profit agencies.
- Fund infrastructure improvements and public facilities such as sidewalks, street lighting, pedestrian facilities, ADA improvements, and community centers in income-eligible areas.
- Assist community service organizations in improving or expanding physical structures to serve homeless residents, low- and moderate-income households, and other special needs populations.
- Demolish dilapidated structures to stop the spread of blight in low- and moderate-income areas as needed.

### *Program Administration*

- Program administration related to the planning and execution of community development, housing, and homelessness activities assisted with funds provided under the CDBG, HOME, and ESG programs.

### **3. Evaluation of Past Performance**

Each year, Fulton County reports its progress in meeting its five-year and annual goals by preparing a Consolidated Annual Performance Evaluation Report (CAPER). The CAPER is submitted to HUD within 90 days of the start of the new program year. Copies of recent CAPERs are available for review at Fulton County's Community Development Department or online at [www.fultoncountyga.gov/services/human-services/housing-and-urban-development-funded-programs](http://www.fultoncountyga.gov/services/human-services/housing-and-urban-development-funded-programs).

### **4. Summary of Citizen Participation Process and Consultation Process**

Fulton County conducted significant consultation with residents, County staff, government agencies, nonprofit agencies, housing and homeless service providers, and others to develop this Five-Year Consolidated Plan. The County held public meetings and focus groups, interviewed key stakeholders, and surveyed the public about local housing and community development needs. Together more than 275 people provided input for the Plan. This input is summarized in the Citizen Participation and Needs Assessment sections of this document. Community input was also used to determine needs and priorities.

Fulton County held two virtual meetings to present key findings and receive stakeholder input on the draft plans. Sixty-one (61) people participated in these virtual public meetings on the draft plans. Public comments on the draft Consolidated Plan and Annual Action Plan were received throughout a 30-day public comment period, which ran from May 15 to June 15, 2020. Six (6) comments were received during the public comment period.

### **5. Summary of Public Comments**

Comments received through the public meetings, focus groups, community survey, and one-on-one interviews are summarized in the Citizen Participation section of this Plan and incorporated in individual sections as relevant.

### **6. Summary of Comments or Views Not Accepted and Reasons for Not Accepting Them**

The County took all comments into consideration in preparing this Consolidated Plan and Annual Action Plan. The County reviewed all comments for common and recurring themes to help establish goals and priorities. No comments or views were not accepted.

### **7. Summary**

This five-year plan identifies the community's affordable housing, homeless, and community development needs, as well as outlines a comprehensive and coordinated strategy for implementation of programs. The County will use CDBG, HOME, and ESG funding to leverage other public and private investment in order to address its goals and priorities.



# THE PROCESS

## PR-05 LEAD & RESPONSIBLE AGENCIES 24 CFR 91.200(B)

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

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

TABLE 1 – RESPONSIBLE AGENCIES

Agency Role	Name	Department/Agency
Lead Agency	Fulton County	Department of Community Development
CDBG Administrator	Fulton County	Department of Community Development
HOME Administrator	Fulton County	Department of Community Development
ESG Administrator	Fulton County	Department of Community Development

### Narrative

The Fulton County Department of Community Development provides oversight, management, and administration of projects, programs, and initiatives in conjunction with the 2020-2024 Consolidated Plan and related Annual Action Plans. The Department of Community Development is responsible for all documentation, administrative, and compliance requirements of the HUD-funded programs that the County administers, including the Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), and Emergency Solutions Grants (ESG) programs.

The County works actively to establish and support relationships with other County departments, federal and state agencies, local governments, nonprofit organizations, and private sector partners to identify affordable housing, community development, and supportive service needs in Fulton County and develop strategies to meet these needs with combined resources. Multiple Fulton County departments, nonprofit organizations, and municipalities in Fulton County (Alpharetta, Chattahoochee Hills, College Park, East Point, Fairburn, Hapeville, Milton, Mountain Park, Palmetto, and Union City, as of current cooperative agreements) are primarily responsible for implementing programs and services covered by the Consolidated Plan under supervision of the Department of Community Development.

### Consolidated Plan Public Contact Information

Dawn Butler, Division Manager, Health & Human Services, Fulton County Department of Community Development, 137 Peachtree Street SW, Atlanta, Georgia 30303, 404-808-4150.

---

**PR-10 CONSULTATION – 91.100, 91.200(B), 91.215(L)**
**1. Introduction**

Fulton County conducted a variety of public outreach to gather input from County and City staff, government agencies, nonprofit agencies, affordable housing developers, local service providers, and county residents in preparing this plan. The County held two community meeting open to the general public; conducted three focus groups with nonprofit staff and Continuum of Care members, Health and Human Services Department staff, and Community Development Department staff; interviewed key stakeholders; and queried cooperating cities regarding anticipated capital projects. Additionally, local residents and other stakeholders completed surveys regarding community development and housing priorities. A total of about 57 people attended a community meeting or focus group, 513 people completed the survey (including 220 living in Fulton County outside of Atlanta), and 19 people were interviewed. Outreach results are summarized in the Community Participation section of this Plan.

**Provide a concise summary of the jurisdiction’s activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(I)).**

Fulton County works closely with public and private sector providers to ensure delivery of services to residents and to promote interagency communication and planning. The County has representatives on many non-profit agency boards and/or advisory committees. The County works with various housing, health, mental health, and service agencies to gather data and identify gaps in services.

In developing this Consolidated Plan, the County strives to include input from housing providers and health, mental health, and other service agencies. A variety of assisted housing providers and health, mental health, and service agency stakeholders were invited to participate in an interview, attend a public meeting, and/or take the Housing and Community Needs Survey. These stakeholders included city elected officials and staff, housing authority staff, housing developers, nonprofit organizations, homeless housing and service providers, mental health service providers, agencies serving people with disabilities, senior services, workforce development organizations, and others. The public meetings and focus groups included group discussions of the connections between housing and other community needs. This Consolidated Plan is designed to promote enhanced coordination amongst local housing and service organizations over the next five years.

**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.**

Fulton County falls within the Fulton County Georgia-502 Homeless Continuum of Care (CoC), which was formed to provide a more focused approach to issues of homelessness within the County. The CoC was formed in 2014 to carry out the planning responsibilities for homeless people within the political boundaries of Fulton County. It coordinates housing, services, and funding streams; promotes community-

wide commitment to goals of ending homelessness; analyzes homeless needs in the county; and coordinates the housing and services systems to align resources & functions.

For this Consolidated Plan, the County reached out directly to several organizations that serve residents who are homeless or at-risk residents to better understand the needs of the clients they serve. The County and the consulting team conducted stakeholder interviews and/or focus groups with representatives from the CoC, the Housing Authority of Fulton County, Fulton County Schools, North Fulton Community Charities, HOPE Atlanta, and Atlanta Legal Aid Society.

From a regional perspective, the County collaborates with the State of Georgia, City of Atlanta, and DeKalb County to facilitate service coordination, client referrals and the collection of data through a shared Homeless Management Information System (HMIS).

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

The Emergency Solutions Grant Program is designed to identify sheltered and unsheltered homeless persons, as well as those at risk of homelessness, and provide the services necessary to help those persons to quickly regain stability in permanent housing after experiencing a housing crisis and/or homelessness. The program's focuses on assisting people to regain stability and move to permanent housing.

To assist in determining how to allocate ESG funds, Fulton County held two community meeting, several stakeholder interviews, and three focus groups of County department heads and nonprofit staff to identify priority needs and barriers related to homelessness and potential strategies to address those needs. About 76 people participated through one of these avenues and participants included county residents; agencies including emergency, transitional, and supportive housing providers; service providers and community organizations; and local government agencies. One of the three focus groups specifically included Continuum of Care members and was attended by about 15 participants who provided input on needs related to housing, homelessness, and support services.

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

Representative agencies, groups, and organization that participated in the planning process for Fulton County's 2020-2024 Five-Year Consolidated Plan and 2020 Annual Action Plan are shown in the table on the following pages. In addition to the agencies listed, others may have participated in the online survey, which was anonymous.

## **Identify any agency types not consulted and provide rationale for not consulting.**

Efforts were made to consult as broad a group of community stakeholders as possible. Email notifications and invitations regarding the community meetings, focus groups, and survey were distributed to stakeholders by Fulton County. No agency types were excluded from participation.

**TABLE 2 – AGENCIES, GROUPS, ORGANIZATIONS WHO PARTICIPATED**

Agency/Group/Organization Name		Type	Section of Plan Addressed	Consultation Method
1	Antioch Urban Ministries	<ul style="list-style-type: none"> <li>• Services – homeless, HIV/AIDS</li> <li>• Housing</li> </ul>	<ul style="list-style-type: none"> <li>• Housing need assessment</li> <li>• Homeless needs</li> <li>• Non-housing community development strategy</li> </ul>	<ul style="list-style-type: none"> <li>• Focus group</li> </ul>
2	Atlanta Legal Aid	<ul style="list-style-type: none"> <li>• Services – fair housing</li> <li>• Other – legal services</li> </ul>	<ul style="list-style-type: none"> <li>• Housing need assessment</li> <li>• Market analysis</li> <li>• Non-housing community development strategy</li> </ul>	<ul style="list-style-type: none"> <li>• Stakeholder interview</li> </ul>
3	Caring Works, Inc.	<ul style="list-style-type: none"> <li>• Housing</li> <li>• Services – homeless</li> </ul>	<ul style="list-style-type: none"> <li>• Housing need assessment</li> <li>• Homeless needs</li> <li>• Homelessness strategy</li> <li>• Non-housing community development strategy</li> </ul>	<ul style="list-style-type: none"> <li>• Focus group</li> </ul>
4	Center for Pan Asian Community Services (CPACS)	<ul style="list-style-type: none"> <li>• Services – children, elderly, health</li> <li>• Other – services for immigrants and refugees</li> <li>• Other – advocacy organization</li> </ul>	<ul style="list-style-type: none"> <li>• Housing need assessment</li> <li>• Non-homeless special needs</li> <li>• Non-housing community development strategy</li> <li>• Anti-poverty strategy</li> </ul>	<ul style="list-style-type: none"> <li>• Stakeholder interview</li> </ul>
5	City of Alpharetta	<ul style="list-style-type: none"> <li>• Other government – local</li> </ul>	<ul style="list-style-type: none"> <li>• Market analysis</li> <li>• Non-housing community development strategy</li> </ul>	<ul style="list-style-type: none"> <li>• Capital project survey</li> </ul>
6	City of Chattahoochee Hills	<ul style="list-style-type: none"> <li>• Other government – local</li> </ul>	<ul style="list-style-type: none"> <li>• Market analysis</li> <li>• Non-housing community development strategy</li> </ul>	<ul style="list-style-type: none"> <li>• Capital project survey</li> </ul>
7	City of College Park	<ul style="list-style-type: none"> <li>• Other government – local</li> </ul>	<ul style="list-style-type: none"> <li>• Market analysis</li> <li>• Non-housing community development strategy</li> </ul>	<ul style="list-style-type: none"> <li>• Capital project survey</li> </ul>
8	City of East Point	<ul style="list-style-type: none"> <li>• Other government – local</li> </ul>	<ul style="list-style-type: none"> <li>• Housing need assessment</li> <li>• Market analysis</li> <li>• Non-housing community development strategy</li> </ul>	<ul style="list-style-type: none"> <li>• Stakeholder interview</li> <li>• Capital project survey</li> </ul>
9	City of Fairburn	<ul style="list-style-type: none"> <li>• Other government – local</li> </ul>	<ul style="list-style-type: none"> <li>• Market analysis</li> <li>• Non-housing community development strategy</li> </ul>	<ul style="list-style-type: none"> <li>• Capital project survey</li> </ul>
10	City of Hapeville	<ul style="list-style-type: none"> <li>• Other government – local</li> </ul>	<ul style="list-style-type: none"> <li>• Market analysis</li> <li>• Non-housing community development strategy</li> </ul>	<ul style="list-style-type: none"> <li>• Capital project survey</li> </ul>

TABLE 2 – AGENCIES, GROUPS, ORGANIZATIONS WHO PARTICIPATED (CONTINUED)

Agency/Group/Organization Name		Type	Section of Plan Addressed	Consultation Method
11	City of Milton	<ul style="list-style-type: none"> <li>• Other government – local</li> <li>•</li> </ul>	<ul style="list-style-type: none"> <li>• Market analysis</li> <li>• Non-housing community development strategy</li> </ul>	<ul style="list-style-type: none"> <li>• Capital project survey</li> </ul>
12	City of Mountain Park	<ul style="list-style-type: none"> <li>• Other government – local</li> <li>•</li> </ul>	<ul style="list-style-type: none"> <li>• Market analysis</li> <li>• Non-housing community development strategy</li> </ul>	<ul style="list-style-type: none"> <li>• Capital project survey</li> </ul>
13	City of Palmetto	<ul style="list-style-type: none"> <li>• Other government – local</li> <li>•</li> </ul>	<ul style="list-style-type: none"> <li>• Market analysis</li> <li>• Non-housing community development strategy</li> </ul>	<ul style="list-style-type: none"> <li>• Capital project survey</li> </ul>
14	City of Roswell	<ul style="list-style-type: none"> <li>• Other government – local</li> <li>•</li> </ul>	<ul style="list-style-type: none"> <li>• Housing need assessment</li> <li>• Market analysis</li> <li>• Non-housing community development strategy</li> </ul>	<ul style="list-style-type: none"> <li>• Stakeholder interview</li> </ul>
15	City of South Fulton	<ul style="list-style-type: none"> <li>• Other government – local</li> <li>•</li> </ul>	<ul style="list-style-type: none"> <li>• Housing need assessment</li> <li>• Market analysis</li> <li>• Non-housing community development strategy</li> </ul>	<ul style="list-style-type: none"> <li>• Stakeholder interview</li> </ul>
16	City of Union City	<ul style="list-style-type: none"> <li>• Other government – local</li> <li>•</li> </ul>	<ul style="list-style-type: none"> <li>• Housing need assessment</li> <li>• Market analysis</li> <li>• Non-housing community development strategy</li> </ul>	<ul style="list-style-type: none"> <li>• Stakeholder interview</li> <li>• Capital project survey</li> </ul>
17	Community Advanced Practice Nurses	<ul style="list-style-type: none"> <li>• Services – health</li> </ul>	<ul style="list-style-type: none"> <li>• Non-homeless special needs</li> <li>• Non-housing community development strategy</li> </ul>	<ul style="list-style-type: none"> <li>• Focus group</li> </ul>
18	Covenant House Georgia	<ul style="list-style-type: none"> <li>• Housing</li> <li>• Services – homeless, youth</li> </ul>	<ul style="list-style-type: none"> <li>• Housing need assessment</li> <li>• Homeless needs</li> <li>• Non-housing community development strategy</li> </ul>	<ul style="list-style-type: none"> <li>• Focus group</li> </ul>
19	Development Authority of Fulton County	<ul style="list-style-type: none"> <li>• Other government – county</li> </ul>	<ul style="list-style-type: none"> <li>• Housing need assessment</li> <li>• Market analysis</li> <li>• Non-housing community development strategy</li> </ul>	<ul style="list-style-type: none"> <li>• Stakeholder interview</li> </ul>
20	Eagles Economic CDC	<ul style="list-style-type: none"> <li>• Services – employment</li> </ul>	<ul style="list-style-type: none"> <li>• Non-housing community development strategy</li> <li>• Anti-poverty strategy</li> </ul>	<ul style="list-style-type: none"> <li>• Focus group</li> </ul>

**TABLE 2 – AGENCIES, GROUPS, ORGANIZATIONS WHO PARTICIPATED (CONTINUED)**

Agency/Group/Organization Name	Type	Section of Plan Addressed	Consultation Method
21 East Point and Fairburn Housing Authorities	<ul style="list-style-type: none"> <li>• Other government – local</li> <li>• Housing</li> </ul>	<ul style="list-style-type: none"> <li>• Housing need assessment</li> <li>• Public housing needs</li> <li>• Market analysis</li> <li>• Non-housing community development strategy</li> </ul>	<ul style="list-style-type: none"> <li>• Stakeholder interview</li> </ul>
22 Fulton County Board of Commissioners – Districts 3 and 4	<ul style="list-style-type: none"> <li>• Other government – county</li> </ul>	<ul style="list-style-type: none"> <li>• Housing need assessment</li> <li>• Homeless needs</li> <li>• Homelessness strategy</li> <li>• Non-housing community development strategy</li> <li>• Anti-poverty strategy</li> </ul>	<ul style="list-style-type: none"> <li>• Stakeholder interviews</li> </ul>
23 Fulton County Continuum of Care	<ul style="list-style-type: none"> <li>• Other government – county</li> <li>• Services – homelessness</li> </ul>	<ul style="list-style-type: none"> <li>• Homeless needs</li> <li>• Homelessness strategy</li> <li>• Housing need assessment</li> <li>• Non-housing community development strategy</li> </ul>	<ul style="list-style-type: none"> <li>• Stakeholder interview</li> <li>• Focus group</li> </ul>
24 Fulton County Department of Arts and Culture	<ul style="list-style-type: none"> <li>• Other government – county</li> </ul>	<ul style="list-style-type: none"> <li>• Housing need assessment</li> <li>• Non-housing community development strategy</li> </ul>	<ul style="list-style-type: none"> <li>• Focus group</li> </ul>
25 Fulton County Department of Behavioral Health and Developmental Disabilities	<ul style="list-style-type: none"> <li>• Other government – county</li> </ul>	<ul style="list-style-type: none"> <li>• Housing need assessment</li> <li>• Non-homeless special needs</li> <li>• Non-housing community development strategy</li> <li>• Anti-poverty strategy</li> </ul>	<ul style="list-style-type: none"> <li>• Focus group</li> </ul>
26 Fulton County Department of Community Development	<ul style="list-style-type: none"> <li>• Other government- county</li> <li>• Grantee department</li> </ul>	<ul style="list-style-type: none"> <li>• Housing need assessment</li> <li>• Market analysis</li> <li>• Non-housing community development strategy</li> </ul>	<ul style="list-style-type: none"> <li>• Focus group</li> </ul>
27 Fulton County Department of Community Development, Youth and Community Services Division	<ul style="list-style-type: none"> <li>• Other government – county</li> <li>• Grantee department</li> </ul>	<ul style="list-style-type: none"> <li>• Non-homeless special needs</li> <li>• Non-housing community development strategy</li> </ul>	<ul style="list-style-type: none"> <li>• Stakeholder interview</li> <li>• Focus group</li> </ul>
28 Fulton County Department of HIV Elimination	<ul style="list-style-type: none"> <li>• Other government – county</li> </ul>	<ul style="list-style-type: none"> <li>• Housing need assessment</li> <li>• Homeless needs</li> <li>• Homelessness strategy</li> <li>• Non-homeless special needs</li> </ul>	<ul style="list-style-type: none"> <li>• Focus group</li> </ul>

TABLE 2 – AGENCIES, GROUPS, ORGANIZATIONS WHO PARTICIPATED (CONTINUED)

Agency/Group/Organization Name	Type	Section of Plan Addressed	Consultation Method
29 Fulton County Department of Strategy and Performance Management	• Other government – county	<ul style="list-style-type: none"> <li>• Housing need assessment</li> <li>• Homeless needs</li> <li>• Homelessness strategy</li> <li>• Market analysis</li> <li>• Non-housing community development strategy</li> </ul>	• Focus group
30 Fulton County Finance Department	• Other government – county	<ul style="list-style-type: none"> <li>• Housing need assessment</li> <li>• Market analysis</li> <li>• Non-housing community development strategy</li> </ul>	• Focus group
31 Fulton County Housing Authority	<ul style="list-style-type: none"> <li>• Other government – county</li> <li>• Housing</li> </ul>	<ul style="list-style-type: none"> <li>• Housing need assessment</li> <li>• Public housing needs</li> <li>• Market analysis</li> <li>• Non-housing community development strategy</li> </ul>	• Stakeholder interview
32 Fulton County Human Services Department	• Other government- county	<ul style="list-style-type: none"> <li>• Housing need assessment</li> <li>• Homeless needs</li> <li>• Non-homeless special needs</li> <li>• Non-housing community development strategy</li> </ul>	• Focus group
33 Fulton County Office of Diversity and Civil Rights Compliance	• Other government – county	<ul style="list-style-type: none"> <li>• Housing need assessment</li> <li>• Homeless needs</li> <li>• Non-housing community development strategy</li> <li>• Other – fair housing</li> </ul>	• Focus group
34 Fulton County Schools	• Services – education	<ul style="list-style-type: none"> <li>• Housing need assessment</li> <li>• Non-housing community development strategy</li> </ul>	• Stakeholder interview
35 Fulton County Senior Services	<ul style="list-style-type: none"> <li>• Other government – county</li> <li>• Services – elderly persons</li> </ul>	<ul style="list-style-type: none"> <li>• Housing need assessment</li> <li>• Non-homeless special needs</li> <li>• Non-housing community development strategy</li> <li>• Anti-poverty strategy</li> </ul>	• Focus group
36 Georgia Advocacy Office	• Services – people with disabilities	<ul style="list-style-type: none"> <li>• Housing need assessment</li> <li>• Non-homeless special needs</li> <li>• Non-housing community development strategy</li> </ul>	• Stakeholder interview

**TABLE 2 – AGENCIES, GROUPS, ORGANIZATIONS WHO PARTICIPATED (CONTINUED)**

Agency/Group/Organization Name	Type	Section of Plan Addressed	Consultation Method
37 HOPE Atlanta	<ul style="list-style-type: none"> <li>• Housing</li> <li>• Services – homeless</li> </ul>	<ul style="list-style-type: none"> <li>• Housing need assessment</li> <li>• Homeless needs</li> <li>• Non-housing community development strategy</li> </ul>	<ul style="list-style-type: none"> <li>• Stakeholder interview</li> </ul>
38 Latin American Association	<ul style="list-style-type: none"> <li>• Services – education, employment</li> <li>• Other – services for immigrants</li> <li>• Other – advocacy organization</li> </ul>	<ul style="list-style-type: none"> <li>• Non-homeless special needs</li> <li>• Non-housing community development strategy</li> <li>• Anti-poverty strategy</li> </ul>	<ul style="list-style-type: none"> <li>• Stakeholder interview</li> </ul>
39 Mary Hall Freedom House	<ul style="list-style-type: none"> <li>• Services – homeless</li> </ul>	<ul style="list-style-type: none"> <li>• Housing need assessment</li> <li>• Homeless needs</li> <li>• Non-housing community development strategy</li> </ul>	<ul style="list-style-type: none"> <li>• Focus group</li> </ul>
40 Metro Fair Housing Services	<ul style="list-style-type: none"> <li>• Services – fair housing</li> <li>• Other – legal services</li> </ul>	<ul style="list-style-type: none"> <li>• Housing need assessment</li> <li>• Market analysis</li> <li>• Non-housing community development strategy</li> </ul>	<ul style="list-style-type: none"> <li>• Stakeholder interview</li> </ul>
41 New American Pathways	<ul style="list-style-type: none"> <li>• Services – children, education, employment</li> <li>• Other – services for immigrants and refugees</li> <li>• Other – advocacy organization</li> </ul>	<ul style="list-style-type: none"> <li>• Housing need assessment</li> <li>• Non-homeless special needs</li> <li>• Non-housing community development strategy</li> <li>• Anti-poverty strategy</li> </ul>	<ul style="list-style-type: none"> <li>• Stakeholder interview</li> </ul>
42 Nicholas House	<ul style="list-style-type: none"> <li>• Housing</li> <li>• Services – homeless</li> </ul>	<ul style="list-style-type: none"> <li>• Housing need assessment</li> <li>• Homeless needs</li> <li>• Non-housing community development strategy</li> </ul>	<ul style="list-style-type: none"> <li>• Focus group</li> </ul>
43 North Fulton Community Charities	<ul style="list-style-type: none"> <li>• Services – homeless, education, employment</li> </ul>	<ul style="list-style-type: none"> <li>• Housing need assessment</li> <li>• Homeless needs</li> <li>• Non-housing community development strategy</li> </ul>	<ul style="list-style-type: none"> <li>• Stakeholder interview</li> </ul>



## Other Local/Regional/State/Federal Planning Efforts Considered when Preparing the Plan

TABLE 3 – OTHER LOCAL / REGIONAL / FEDERAL PLANNING EFFORTS

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Fulton County	Continuum of Care members assist with emergency shelter, transitional housing, homelessness prevention, and outreach and supportive services, which align with goals and priorities identified in the Strategic Plan.
Fulton County Strategic Plan (2016-2019)	Fulton County Office of Strategy and Performance Management	Goals identified in the Comprehensive Plan which align with those of the Strategic Plan include: <ul style="list-style-type: none"> <li>• Improve the quality, quantity, and accessibility of housing stock across the County.</li> <li>• Develop a sense of community and independence among seniors and intellectually and developmentally disabled (IDD) persons by providing an affordable, safe space to receive care.</li> <li>• Ensure that the county-wide workforce has the skills needed to meet business demand and opportunities to overcome hiring barriers.</li> <li>• Expand the County's economic development impact by pursuing opportunities that link to regional economic development efforts, target areas with the greatest need, and increase return on investment.</li> <li>• Deliver high quality cultural and recreation services through County facilities.</li> <li>• Increase access to arts and culture services across the county by funding organizations key to the county's cultural ecosystem.</li> <li>• Ensure that Fulton County residents live in the healthiest environment possible.</li> </ul>
Fulton County Comprehensive Plan (2016-2035)	Fulton County Department of Planning and Community Services	Goals identified in the Comprehensive Plan which align with those of the Strategic Plan include: <ul style="list-style-type: none"> <li>• Senior housing options should expand as the population continues to grow.</li> </ul>

**TABLE 3 – OTHER LOCAL / REGIONAL / FEDERAL PLANNING EFFORTS (CONTINUED)**

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
		<ul style="list-style-type: none"> <li>• Make “Aging in Place” a more achievable reality by aligning with the goals and policies of the Atlanta Regional Commission’s Aging-in-Place initiative.</li> <li>• Encourage a wide variety of housing types to accommodate a range of income levels for current and future residents.</li> <li>• Promote appropriate infill housing and development through planning, infrastructure placement, and regulations.</li> <li>• Encourage development that promotes open space, walking paths and bicycle lanes as a means to connectivity and neighborhood cohesiveness.</li> <li>• Review current land use development patterns that may cause difficulties in the creation of walkable/bikeable communities and MARTA transit opportunities by encouraging wider sidewalks and pedestrian amenities.</li> <li>• Seek transportation enhancements (highway, transit, bicycle, and pedestrian) to compliment and align with land use efforts.</li> <li>• Plan and design multi-use trails and/or sidewalks during the development or renovation of any Fulton County facility.</li> <li>• Encourage cooperative efforts between the city, county and school district to provide adequate facilities for community activities and needs (i.e. senior and youth centers).</li> </ul>
Cradle to Golden Years Five-Year Strategic Plan (2016-2020)	Fulton County Aging and Youth Services Department	<p>Goals identified in the Comprehensive Plan which align with those of the Strategic Plan include:</p> <ul style="list-style-type: none"> <li>• To secure commitment from partners to develop and invest in intergenerational housing that meets the housing and social needs of citizens.</li> <li>• To advocate for government and private partnerships to support affordable and accessible housing so that citizens are not displaced from the county.</li> <li>• To enhance long-term services and supports for seniors that enable them to remain at home and age in place.</li> </ul>

TABLE 3 – OTHER LOCAL / REGIONAL / FEDERAL PLANNING EFFORTS (CONTINUED)

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
		<ul style="list-style-type: none"> <li>• To improve access to screenings and immunizations that result in better health outcomes.</li> <li>• To ensure children are receiving developmental screenings and the necessary support to prepare them for kindergarten and beyond.</li> <li>• To create intergenerational programs and services to enhance social skills and academic outcomes for children and youth.</li> <li>• To facilitate engagement and mentoring opportunities that decrease social isolation among the senior population.</li> <li>• To elevate the level of communication and understanding between seniors, children, and youth.</li> <li>• To provide caregiver and relative-care education and support that improve the quality of life and relationships between the caregiver and care recipient.</li> <li>• To advocate for government and private partnerships to eliminate food deserts as a means to address nutrition-related health problems including obesity, diabetes, and heart disease.</li> <li>• To partner with organizations in educating the public about the advantages of shared housing in addressing financial needs and social isolation.</li> <li>• To leverage county dollars with partners to implement programs that enhance the quality of life of existing customers while attracting new ones who could benefit from the services.</li> <li>• To develop partnerships that will increase transportation options and increase rider capacity.</li> <li>• To develop web-based courses that increase access to health and wellness programming.</li> <li>• To facilitate the co-location of services (via on-site or app-based) for seniors, children, and youth in the four multipurpose facilities that increase access to public and private services.</li> <li>• To invest in evidence-based health and wellness services that lower hospital readmissions and prevent premature institutionalization.</li> </ul>

TABLE 3 – OTHER LOCAL / REGIONAL / FEDERAL PLANNING EFFORTS (CONTINUED)

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
		<ul style="list-style-type: none"> <li>• To promote instructional programs that improve public safety.</li> <li>• To enhance case management services that promote self-sufficiency.</li> <li>• To promote and enhance resources that assist individuals with financial management to improve economic status.</li> <li>• To connect citizens to publicly and privately funded emergency assistance programs that provide temporary financial relief.</li> <li>• To connect citizens with workforce development resources that increase their access to economic opportunities.</li> <li>• To identify partners that mitigate generational trends of unhealthy/criminal behavior and improve family dynamics.</li> </ul>
Fulton County Homeless Plan Strategy (2019 Draft)	Fulton County Homeless Programs Division	<p>Goals identified in the Draft Homeless Plan Strategy which align with those of the Strategic Plan include:</p> <ul style="list-style-type: none"> <li>• Expand Housing Resources: <ul style="list-style-type: none"> <li>○ Expand the inventory of low-income housing in both non-profit and for-profit sectors and grow the sources of available funding.</li> <li>○ Develop goals in partnership with the Fulton County's Departments and programs that provide services to the homeless population to include sub-goals for each homeless sub-population, including single adults, families with children, and units for youth.</li> </ul> </li> <li>• Standardize Best Practices: Establishment of system-wide basic standards for all county funded service providers to increase housing placement and reduce reentry to homelessness.</li> <li>• County Homeless Housing Policy: Build a cohesive, county policy framework via zoning, development and related policy areas to create a unified and effective approach to include: Increased Housing Densities; Review of County Housing Development Standards; Integration of local municipality planning processes; and, Exploration of local municipality resources.</li> </ul>

## **Describe cooperation and coordination with other public entities, including the state and any adjacent units of general local government, in the implementation of the Consolidated Plan (91.215(l)).**

As Fulton County implements the 5-Year Consolidated Plan, they will continue to work with other local public and private entities, regional organizations, and the state of Georgia. Several public entities provided input during the development of this Plan, including Fulton County Department of Community Development, Fulton County Continuum of Care, the Housing Authority of Fulton County, Fulton County Schools, the Fulton County Development Authority, the City of East Point, the City of Roswell, the City of Union City, and East Point and Fairburn Housing Authorities.

---

### **PR-15 CITIZEN PARTICIPATION**

#### **1. Summary of Citizen Participation and Efforts to Broaden Citizen Participation**

##### **Summarize citizen participation process and how it impacted goal-setting.**

Fulton County residents were invited to provide input for this Consolidated Plan by attending a public meeting or focus group and participating in a community-wide survey. Public meetings were held in North and South Fulton on September 17 and September 25, 2019, respectively. Residents and other stakeholders were also invited to attend a focus group on September 19, 2019; two other focus groups were held for County staff. A total of 57 people participated in a public meeting or focus group.

A Housing and Community Needs Survey was available to residents in both English and Spanish via a weblink and in hard copy. Paper copies of the survey were available at the public meetings and focus groups. The survey was available from August 21 through November 8, 2019, and a total of 513 responses were received as of the date of this draft; 220 of these responses were from residents living in Fulton County outside of Atlanta.

Advertisement for the public meetings and survey targeted the general public, as well as nonprofits, service providers, housing providers, and others working with low- and moderate-income households and special needs populations. The County sent a press release to local media outlets and the meeting dates and survey link were advertised in the Atlanta Journal-Constitution. The *AJC*, *Saporta Report*, *FGTV*, *Reporter Newspaper*, and *What's Next ATL* ran stories about the Consolidated Plan public meetings and provided a link to the online survey. WABE, Atlanta's local NPR station, also featured a story on the planning processes in an on-air segment of "Closer Look." The County advertised the meetings on its Facebook page, Twitter feed, and through NextDoor, and asked partner agencies to post about the project on their social media as well. Flyers were emailed to more than 40 local housing and service providers, community development practitioners, and county and municipal staff, both as outreach to these stakeholders and for distribution to their clients/residents. County staff also attended a meeting of the Atlanta Downtown Neighborhood Association on September 10, 2019 to advertise opportunities to participate in the Consolidated Plan to the 40+ meeting attendees. Meeting advertisements noted that accommodations (including translation, interpretation, or accessibility needs) were available if needed; no requests for accommodations were received.

In addition to public meetings, staff focus groups and the survey, personal interviews were also conducted with several key stakeholders and groups representing a variety of viewpoints relevant to the development of the Consolidated Plan and Analysis of Impediments to Fair Housing Choice. Invitations were extended to more than 40 representatives, and 19 participated in interviews.

Dates, times, and locations for the public meetings and focus groups are shown below:

**Public Meeting #1**

**North Fulton Community Meeting**

Tuesday, September 17, 2019

6 PM

North Fulton Annex

7741 Roswell Road NE

Atlanta, GA 30350

**Public Meeting #2**

**South Fulton Community Meeting**

Wednesday, September 25, 2019

6 PM

South Fulton Annex

5600 Stonewall Tell Road

Atlanta, GA 30349

**Focus Group #1**

**Health and Human Services Department Staff**

Tuesday, September 17, 2019

1 PM

1st Floor, 137 Peachtree Street SW

Atlanta, GA 30303

**Focus Group #3**

**Department of Housing and Community Development Staff**

Friday, September 27, 2019

2 PM

1st Floor, 137 Peachtree Street SW

Atlanta, GA 30303

**Focus Group #2**

**Continuum of Care, Nonprofit Staff, General Public**

Thursday, September 19, 2019

1 PM

South Fulton Annex

5600 Stonewall Tell Road

Atlanta, GA 30349

Fulton County held a 30-day public comment period to receive comments on the draft 2020-2024 Consolidated Plan and 2019-2020 Annual Action Plan from May 15 to June 15, 2020. During this time, copies of the draft reports were available for public inspection, and residents and stakeholders provided written comments to the Community and Economic Development Department. Six (6) comments were received during the public comment period. Fulton County also held two virtual meetings to present key findings and receive stakeholder input on the draft plans. Sixty-one (61) people participated in meetings on the draft plans.

A summary of community outreach efforts and responses is shown below, with complete survey results and evidence of outreach materials available as an appendix.

## Citizen Participation Outreach

TABLE 4 – CITIZEN PARTICIPATION OUTREACH

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received	Comments not accepted
1	Health and Human Services Departments Staff Focus Group	Health and Human Services departments staff	11 focus group attendees	<p>Needs identified by meeting participants include:</p> <p><u>Housing and Homelessness</u></p> <ul style="list-style-type: none"> <li>• Affordable housing</li> <li>• Affordable housing for seniors</li> <li>• An active land trust</li> <li>• Sustainable funding source for affordable housing</li> <li>• Affordable Housing Fund</li> <li>• Decent housing for people with HIV/AIDS</li> <li>• Small housing authorities should work more closely</li> <li>• Housing with supportive services for people with behavioral health issues and homeless youth</li> <li>• Bridge/ transitional housing</li> <li>• Housing for artists</li> <li>• Housing for adults and young adults with disabilities</li> <li>• Education for cities opposed to affordable housing development</li> </ul> <p><u>Public Services</u></p> <ul style="list-style-type: none"> <li>• Childcare services outside of traditional hours</li> <li>• Services for re-entry population</li> <li>• Supportive services in transitional housing</li> <li>• Workforce development programs, including for seniors looking to reenter the workforce</li> <li>• Connecting people receiving public services, such as the program for mothers, to housing options</li> <li>• Improved connections between departments so people know what's available</li> </ul>	None

TABLE 4 – CITIZEN PARTICIPATION OUTREACH (CONTINUED)

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received	Comments not accepted
2	Continuum of Care, Nonprofit, and General Public Focus Group	Nonprofit service providers and Continuum of Care members  General public / Fulton County residents	14 focus group attendees	<p><u>Public Facilities</u></p> <ul style="list-style-type: none"> <li>• Facility to help people transitioning into permanent housing from homelessness</li> <li>• Could collaborate with funding among agencies</li> </ul> <p>Needs identified by focus group participants include:</p> <p><u>Housing and Homelessness</u></p> <ul style="list-style-type: none"> <li>• Affordable housing</li> <li>• Housing subsidies</li> <li>• Need a more aggressive solution rather than piecemeal</li> <li>• Technical assistance for smaller organizations</li> <li>• Programs to encourage landlords to rent accept Section 8</li> <li>• Marketing around affordable housing in areas opposed to it</li> <li>• People locked out of housing because of no tolerance policy</li> <li>• Updated directory of available services for homelessness</li> <li>• Permanent supportive housing</li> </ul> <p><u>Public Services</u></p> <ul style="list-style-type: none"> <li>• Childcare services outside of traditional hours</li> <li>• Get information about population that is doubling up to provide services</li> <li>• Expand mental health services</li> <li>• Food and workforce development services in housing</li> <li>• Training on financial literacy</li> <li>• Employment navigation and training so that people can grow their incomes</li> <li>• Education, healthy living, financial training for youth</li> <li>• Access to healthcare</li> </ul>	None



TABLE 4 – CITIZEN PARTICIPATION OUTREACH (CONTINUED)

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received	Comments not accepted
				<u>Public Facilities</u> <ul style="list-style-type: none"> <li>• South Fulton would benefit from a one-stop shop type facility, similar to City of Refuge in Atlanta</li> <li>• Shelters for male children age 13+ and large families</li> <li>• Need to look at how to leverage federal funds with funds in the community</li> </ul>	
3	Department of Housing and Community Development Focus Group	Department of Housing and Community Development staff	18 focus group participants	<p>Needs identified by focus group participants include:</p> <u>Housing and Homelessness</u> <ul style="list-style-type: none"> <li>• Lack of homeless shelters in south Fulton County</li> <li>• Lack of affordable housing</li> <li>• Need to rehab, reuse blighted, dormant houses</li> <li>• Vacant houses have been bought up by investors, LLCs, some of which are owned internationally</li> <li>• Code enforcement needs to hold people with blighted properties accountable</li> <li>• People on fixed incomes cannot make repairs, and this is where rehab issues come in</li> <li>• Gentrification is pushing people out further, especially if they have to take MARTA or take car</li> <li>• Need land trusts to make sure housing stays affordable</li> <li>• In established neighborhoods, NIMBYism toward multi-family housing</li> <li>• More landlords who accept vouchers; City of Atlanta has rapid rehousing vouchers that are just sitting</li> <li>• More resources for homeless prevention; it's easier to keep someone housed than to rapidly rehouse them</li> <li>• Fulton County is working with Atlanta CoC on 550 units of housing for people who are homeless, with Fulton providing wrap around services</li> </ul>	None

TABLE 4 – CITIZEN PARTICIPATION OUTREACH (CONTINUED)

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received	Comments not accepted
				<p><u>Public Services</u></p> <ul style="list-style-type: none"> <li>• Food deserts, lack of grocery stores</li> <li>• Kindergarten readiness</li> <li>• Lack of career development, college, vocational training, entrepreneurship</li> <li>• Drugs and opioid use</li> <li>• In North Fulton, people with developmental disabilities and high functioning autism need services</li> <li>• Workforce opportunities of adults; WorkSource agencies are strategically located but don't have enough resources; Computers are a need; WorkSource is working on mobile units that can go into the community, but is a need for more resources</li> <li>• Rec centers summer programs stop at 5th or 6th grade, but there is a need for programming for early teens</li> <li>• Transportation to get people to programming (youth or seniors)</li> </ul> <p><u>Public Facilities/ Infrastructure</u></p> <ul style="list-style-type: none"> <li>• Mental health centers, or places where people can have mental health needs addressed; A lot of the homeless individuals that are encountered have mental health needs</li> <li>• South Fulton needs sidewalks and crosswalks; They have been building up Camp Creek, but sidewalks, street lights, street signs, bike lanes, etc. are lacking</li> </ul>	

TABLE 4 – CITIZEN PARTICIPATION OUTREACH (CONTINUED)

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received	Comments not accepted and reasons
4	Public meetings	<p>Fulton County residents, including minority residents, people with limited English proficiency, people with disabilities, and public/ assisted housing residents</p> <p>Housing and service providers</p> <p>Community development practitioners</p>	14 meeting attendees	<p>Needs identified by meeting participants include:</p> <p><u>Housing and Homelessness</u></p> <ul style="list-style-type: none"> <li>• Senior housing, including a variety of housing options for seniors looking to downsize</li> <li>• Housing available for seniors with incomes of \$30,000-40,000</li> <li>• Homeless shelters and emergency shelters in south Fulton County; All facilities are in downtown and midtown Atlanta</li> <li>• Cold weather shelters / warming stations</li> <li>• Fair market rent is high in the area; There is a need for more affordable housing</li> <li>• Rehab of senior homes - 300 people are on the interest list</li> <li>• Programs for people transitioning from renting to owning</li> <li>• Need for a sustainable affordable housing strategy for long-term affordability</li> </ul> <p><u>Public Services</u></p> <ul style="list-style-type: none"> <li>• Senior services available to people of moderate incomes</li> <li>• Food access</li> <li>• Improved communications with residents regarding existing services</li> <li>• Childcare</li> </ul> <p><u>Public Facilities</u></p> <ul style="list-style-type: none"> <li>• Space/ facilities for community gardens/ food access (potential to partner with FoodWell Alliance)</li> </ul>	None

TABLE 4 – CITIZEN PARTICIPATION OUTREACH (CONTINUED)

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received	Comments not accepted and reasons
5	Housing and Community Needs Survey	<p>Fulton County residents, including minority residents, people with limited English proficiency, people with disabilities, and public/ assisted housing residents</p> <p>Housing and service providers</p> <p>Community development practitioners</p>	220 survey participants in Fulton County outside Atlanta	<p>Top needs identified by survey participants include:</p> <p><u>Public Facilities and Infrastructure</u></p> <ul style="list-style-type: none"> <li>• Street, road, or sidewalk improvements</li> <li>• Community parks, gyms, and recreational fields</li> <li>• Healthcare facilities</li> <li>• Community centers (i.e., youth centers, senior centers, cultural centers)</li> <li>• Bike or walking trails</li> </ul> <p><u>Economic/ Community Development</u></p> <ul style="list-style-type: none"> <li>• Redevelopment or demolition of abandoned properties</li> <li>• Incentives for creating jobs</li> <li>• Financial assistance for community organizations</li> </ul> <p><u>Public Services</u></p> <ul style="list-style-type: none"> <li>• Drug abuse/ crime prevention</li> <li>• Youth services</li> <li>• Employment training</li> <li>• Senior services</li> <li>• Job search assistance</li> <li>• Medical and dental services</li> <li>• Domestic abuse services</li> <li>• Child abuse prevention</li> <li>• Neighborhood cleanups</li> <li>• Housing counseling</li> <li>• Transportation assistance</li> <li>• Food banks/community meals</li> <li>• Legal services</li> <li>• Childcare</li> </ul> <p><u>Homelessness</u></p> <ul style="list-style-type: none"> <li>• Homelessness prevention</li> <li>• Transitional/ supportive housing programs</li> </ul>	None

TABLE 4 – CITIZEN PARTICIPATION OUTREACH (CONTINUED)

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received	Comments not accepted and reasons
				<ul style="list-style-type: none"> <li>• Permanent housing</li> <li>• Outreach to homeless persons</li> <li>• Access to shelters</li> </ul> <u>Housing</u> <ul style="list-style-type: none"> <li>• Elderly or senior housing</li> <li>• Energy efficiency improvements to housing</li> <li>• Housing for people with disabilities</li> <li>• Grants to improve affordable rental housing/apartments</li> <li>• Help for homeowners to make housing improvements</li> <li>• Help buying a home / down payment assistance</li> <li>• Family housing</li> <li>• Construction of new affordable rental units</li> </ul>	
6	Public comment period	<p>Fulton County residents, including minority residents, people with limited English proficiency, people with disabilities, and public/ assisted housing residents</p> <p>Housing and service providers</p> <p>Community development practitioners</p>	6 comments received	<p>Written comments received during the public comment period are appended to this plan. These comments discussed:</p> <ul style="list-style-type: none"> <li>• Potential spending on single-family home rehab projects.</li> <li>• Need for senior home repair and renovation.</li> <li>• Need for inclusion of youth-focused statistical data.</li> <li>• Permanent supportive housing for unaccompanied youth, including housing that is under development.</li> <li>• Need for outreach services to people who are homeless in north Fulton County, such as showering and laundry services.</li> <li>• Need to plan for expiring LIHTC units, including replacement affordable housing units and/or vouchers.</li> </ul>	None

**TABLE 4 – CITIZEN PARTICIPATION OUTREACH (CONTINUED)**

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received	Comments not accepted and reasons
7	Public hearings on draft plan	<p>Fulton County residents, including minority residents, people with limited English proficiency, people with disabilities, and public/ assisted housing residents</p> <p>Housing and service providers</p> <p>Community development practitioners</p>	61 participants	<ul style="list-style-type: none"> <li>• Discussion of housing availability at housing authority properties.</li> <li>• Discussion of potential opportunities for coordination and collaboration between housing authorities and Fulton County to better serve people experiencing homelessness.</li> <li>• Discussion of expiring Low Income Housing Tax Credit properties.</li> </ul>	None

# NEEDS ASSESSMENT

---

## NA-05 OVERVIEW

### Needs Assessment Overview

To inform development of priorities and goals over the next five years, this section of the Consolidated Plan discusses housing, community development, and economic development needs in Fulton County. It relies on data from the U.S. Census, the 2011-2015 American Community Survey (ACS), and a special tabulation of ACS data known as Comprehensive Housing Affordability Strategy (CHAS) data that estimates the number of households with a housing problem. Local data regarding homelessness and assisted housing is included. Finally, public input gathered through interviews, focus groups, meetings, and the community survey are coupled with data analysis to identify priority needs related to affordable housing, homelessness, assisted housing, public services, community development and economic development in Fulton County and its participating municipalities.

Please note that most data in this section for Fulton County refers to the entitlement jurisdiction, which includes unincorporated Fulton County and the cities of Alpharetta, Chattahoochee Hills, College Park, East Point, Fairburn, Hapeville, Milton, Mountain Park, Palmetto, South Fulton, and Union City. Figures do not include Atlanta, Johns Creek, Sandy Springs, or Roswell as they are independent entitlement jurisdictions which prepare their own Consolidated Plans. Instances where figures are for all of Fulton County (including the Atlanta, Sandy Springs, and Roswell) are noted.

---

## NA-10 HOUSING NEEDS ASSESSMENT – 24 CFR 91.205 (A, B, C)

### Summary of Housing Needs

According to the 2011-2015 5-Year American Community Survey, Fulton County (including all of its cities) is most populous county in the state of Georgia with a population of 983,903 residents and 379,957 households. Fulton County's population grew by 21% since 2000. This rate lagged the growth rate seen in some other counties in the Atlanta metro area, including Henry (77%), Cherokee (59%), Douglas (48%) and Gwinnett Counties (46%). However, Fulton County's growth outpaced that of neighboring Cobb (18%) and DeKalb Counties (8%).

HUD provides estimates for the Fulton County entitlement jurisdiction (i.e., Fulton County outside of Atlanta, Sandy Springs, and Roswell). As of the 2011-2015 ACS, there are about 290,000 residents living in 103,000 households in this area. Median household income is about \$57,200, roughly unchanged from the median recorded by the 2005-2009 ACS.

Table 6 segments households by income and household type, including small families (2-4 members), large families (5 or more members), households with seniors, and households with young children. As shown, there are 42,250 households in Fulton County with low or moderate incomes (under 80% of HUD

Adjusted Median Family income (HAMFI)), and together they constitute about 40% of the county's households. Of the county's low- and moderate-income households, 53% are single-person or multi-person, unrelated households; 38% are small families, and 9% are large families. More than one-quarter (27%) have at least one senior member and one-fifth (20%) have at least one child age 6 or younger.

For many low- and moderate-income households in Fulton County, finding and maintaining suitable housing at an affordable cost is a challenge. Tables 7 through 12 identify housing needs by tenure based on Comprehensive Housing Affordability Strategy (CHAS) data. CHAS data is a special tabulation of the U.S. Census' American Community Survey (ACS) that is largely not available through standard Census products. This dataset provides counts of the number of households that fit certain combinations of HUD-specified housing needs, HUD-defined income limits (primarily 30, 50, and 80% of HAMFI), and household types of particular interest to planners and policy makers.

To assess affordability and other types of housing needs, HUD defines four housing problems:

1. Cost burden: A household has a cost burden if its monthly housing costs (including mortgage payments, property taxes, insurance, and utilities for owners and rent and utilities for renters) exceed 30% of monthly income.
2. Overcrowding: A household is overcrowded if there is more than 1 person per room, not including kitchens and bathrooms.
3. Lack of complete kitchen facilities: A household lacks complete kitchen facilities if it lacks one or more of the following: cooking facilities, refrigerator, or a sink with piped water.
4. Lack of complete plumbing facilities: A household lacks complete plumbing facilities if it lacks one or more of the following: hot and cold piped water, a flush toilet, or a bathtub or shower.

HUD also defines four severe housing problems, including a severe cost burden (more than 50% of monthly household income is spent on housing costs), severe overcrowding (more than 1.5 people per room, not including kitchens or bathrooms), lack of complete kitchen facilities (described above), and lack of complete plumbing facilities (described above).

Table 7 shows a total of 34,179 households, approximately 33% of all households in Fulton County, experience one of the listed housing problems. About 17% of households in Fulton County (18,035) have one or more severe housing problems (Table 8).

The remainder of this section characterizes local housing needs in more detail. The Market Analysis component of the Consolidated Plan identifies resources available to respond to these needs (public housing, tax credit and other subsidized properties, housing and services for people who are homeless, and others).



TABLE 5 - HOUSING NEEDS ASSESSMENT DEMOGRAPHICS

Demographics	Most Recent Year: 2015
Population	289,930
Households	103,149
Median Income	\$57,207

Data Source: 2011-2015 ACS (Most Recent Year)

### Number of Households Table

TABLE 6 - TOTAL HOUSEHOLDS TABLE

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	14,640	11,570	16,040	11,164	49,690
Small Family Households	5,270	3,925	7,019	4,894	28,480
Large Family Households	1,615	1,015	1,094	865	4,322
Household contains at least one person 62-74 years of age	2,560	2,256	2,863	1,945	7,659
Household contains at least one person age 75 or older	1,312	1,417	998	1,105	2,094
Households with one or more children 6 years old or younger	3,255	2,107	2,941	1,762	8,054

Data Source: 2011-2015 CHAS

## Housing Needs Summary Tables

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

**TABLE 7 – HOUSING PROBLEMS TABLE**

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
<b>NUMBER OF HOUSEHOLDS</b>										
Substandard Housing - Lacking complete plumbing or kitchen facilities	100	110	115	70	395	20	15	30	19	84
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	185	140	15	35	375	0	0	29	4	33
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	624	240	50	100	1,014	105	50	35	59	249
Housing cost burden greater than 50% of income (and none of the above problems)	6,718	2,393	494	0	9,605	2,568	2,009	1,313	372	6,262
Housing cost burden greater than 30% of income (and none of the above problems)	725	3,524	4,120	454	8,823	438	1,179	2,828	1,579	6,024
Zero/negative Income (and none of the above problems)	990	0	0	0	990	343	0	0	0	343

Data Source: 2011-2015 CHAS

2. Housing Problems 2 (households with one or more severe housing problems: lacks kitchen or complete plumbing, severe overcrowding, severe cost burden)

TABLE 8 – HOUSING PROBLEMS 2

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Having 1 or more of four severe housing problems	7,624	2,888	670	205	11,387	2,693	2,074	1,413	468	6,648
Having none of four severe housing problems	2,030	4,159	7,840	4,854	18,883	958	2,430	6,129	5,654	15,171
Household has negative income, but none of the other severe housing problems	990	0	0	0	990	343	0	0	0	343

Data Source: 2011-2015 CHAS

## 3. Cost Burden &gt; 30%

TABLE 9 – COST BURDEN &gt; 30%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
<b>NUMBER OF HOUSEHOLDS</b>								
Small Related	3,327	2,470	2,450	8,247	952	1,081	1,876	3,909
Large Related	1,125	563	205	1,893	215	232	284	731
Elderly	1,633	856	423	2,912	1,152	1,303	1,016	3,471
Other	2,090	2,454	1,605	6,149	784	617	1,013	2,414
Total need by income	8,175	6,343	4,683	19,201	3,103	3,233	4,189	10,525

Data Source: 2011-2015 CHAS

## 4. Cost Burden &gt; 50%

TABLE 10 – COST BURDEN &gt; 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
<b>NUMBER OF HOUSEHOLDS</b>								
Small Related	3,189	980	105	4,274	859	654	479	1,992
Large Related	1,085	64	0	1,149	120	140	0	260
Elderly	1,214	404	114	1,732	953	825	349	2,127
Other	1,910	1,044	315	3,269	659	404	489	1,552
Total need by income	7,398	2,492	534	10,424	2,591	2,023	1,317	5,931

Data Source: 2011-2015 CHAS

## 5. Crowding (more than one person per room)

TABLE 11 – CROWDING INFORMATION – 1/2

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
<b>NUMBER OF HOUSEHOLDS</b>										
Single family households	749	335	65	165	1,314	70	50	29	0	149
Multiple, unrelated family households	55	45	10	15	125	35	0	33	63	131
Other, non-family households	0	0	0	0	0	0	0	0	0	0
Total need by income	804	380	75	180	1,439	105	50	62	63	280

Data Source: 2011-2015 CHAS

TABLE 12 – CROWDING INFORMATION – 2/2

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

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

American Community Survey estimates indicate that about 30% of households in Fulton County outside of the city of Atlanta are single-person households. Estimates of the number of non-elderly single-person households in need of housing assistance are included in the “other” category of Tables 9 and 10. This category also includes multi-person households whose members are unrelated (e.g., roommates, unmarried partners, etc.). There are an estimated 8,563 single-person or multi-person unrelated households with low or moderate incomes who spend more than 30% of their income on housing. The majority are renters (72%) and the remaining 28% are owners. This “other” category comprises 29% of all low- and moderate-income household with cost burdens.

More than half (4,821 households) of single-person or multi-person unrelated households with cost burdens have housing costs that exceed 50% of their income. Again, these households are more likely to be renters (68%) than owners (34%) and most (53%) have very low incomes (under 30% AMI).

Table 11 provides data for single-person and non-family households that indicates that overcrowding is not a common housing need for this group.

Fulton County's 2019 point-in-time homeless count reported 376 people in households without children (59% of all homeless persons counted). This figure includes single adults and multi-adult households with no children.

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

According to HUD's Affirmatively Furthering Fair Housing data, there are approximately 28,577 people in Fulton County with a disability, or about 8% of the county's total population.<sup>1</sup> CHAS data provides estimates of the number of low- and moderate-income households in Fulton County with housing needs where one or more members have a disability:

- Hearing or vision impairment: There are approximately 2,900 low- or moderate-income households with a housing need where a household member has a hearing or vision impairment. Most are renters (about 60%).
- Ambulatory limitation: There are approximately 5,400 low- or moderate-income households with a housing need where a household member has an ambulatory limitation. Most are renters (about 68%).
- Cognitive limitation: An estimated 3,700 low- or moderate-income households with have a housing need and a household member with a cognitive limitation. About three-fourths are renters.
- Self-care or independent living limitation: An estimated 3,700 low- or moderate-income households with a member who has a self-care or independent living limitation have a housing problem. Again, about three-fourths are renters.

Of the four disability types, households with an ambulatory-limited member and a housing need are most common in Fulton County. Housing needs for people with an ambulatory difficulty may include accessibility improvements such as ramps, widened hallways and doorways, lower counters, and grab bars, along with access to transit or paratransit and other community services. Stakeholder input indicated that sidewalk improvements were also needed to improve neighborhood accessibility.

Homelessness also impacts people with disabilities in Fulton County. HUD defines a chronically homeless individual as someone with a disability who has been living in a place not meant for human habitation, a safe haven, or an emergency shelter for a year (or on at least four separate occasions over the last three years that together total a year). As of Fulton County's 2019 point-in-time count, there were 77 chronically homeless people counted.

While there are no comprehensive estimates of the number and type of families experiencing domestic violence, dating violence, sexual assault, and stalking in Fulton County, input from local service providers indicate continuing need. The CDC estimates that approximately 37% of women and 30% of men in Georgia have experienced sexual violence, physical violence, or stalking by an intimate partner and an

---

<sup>1</sup> HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, AFFHT0004, Released November 2017, <https://egis.hud.gov/affht/>

estimated 46% of women and 50% of men in Georgia have experience physiological aggression by an intimate partner. Section NA-45 (Non-Homeless Special Needs Assessment) further discusses needs related to domestic violence, dating violence, and stalking.

## What are the most common housing problems?

Overwhelmingly, the most common housing problem for low- and moderate-income households in Fulton County is affordability. An estimated 16,355 low- and moderate-income households in Fulton County spend more than one-half of their income on housing. Another 13,371 low- and moderate-income households spend between 30% and 50% of their income on housing. Together, 70% of low- and moderate-income households in Fulton County have a cost burden.

Community input echoes CHAS data findings. Most focus group and interview participants identified affordable housing as a priority need in Fulton County. Stakeholders also noted that housing and services for people who are homeless is also a priority, including transitional housing, bridge housing, housing with supportive services, and homelessness prevention / rapid rehousing.

Housing condition was another common housing problem mentioned by stakeholders. Housing rehabilitation for rental and owned units, especially for vacant or blighted properties, and code enforcement efforts were identified as needs by the community (see Table 4, Citizen Participation Outreach).

When asked to identify the county's greatest housing needs, survey participants selected senior housing (identified as a high need by 98 survey respondents or 58% of people answering that question), energy efficiency improvements (identified as a high need by 94 respondents or 56%), housing for people with disabilities (identified as a high need by 87 respondents or 51%), rental and owned housing improvements (identified as a high need by 98 and 87 respondents, or 58% and 51%, respectively), down payment assistance (identified as a high need by 93 respondents or 55%), and construction of new affordable rental units (identified as a high need by 95 respondents or 56%) as most important.

HUD's CHAS data also looks at overcrowding and housing that lacks complete kitchens or plumbing. Neither problem is particularly prevalent in Fulton County. There are 1,719 household with incomes under 100% AMI who are overcrowded, or about 3% of households in that income range. One percent (1% or 479 households) have a home that lacks a complete kitchen or plumbing. While a very low share of all Fulton County households, an incomplete kitchen or bath represents a considerably severe housing problem.

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

Renters are more often affected by housing problems than owners. Additionally, lower income households are more likely to experience a housing need.

Tables 9 and 10 look at affordability as a housing need by income and tenure. The number of low- and moderate-income renters with a cost burden (19,201 households) is almost twice the number of owners who do so (10,525 households). Severely cost burdened households are 1.75 times likely to be renters than owners.

Affordability issues are most severe for lowest income households. About two-thirds (68%) of households with incomes under 30% AMI spend more than 50% of their income on housing. For low-income households (30 to 50% AMI), 39% have a severe cost burden, and for moderate-income households (50 to 80% AMI), 12% have a severe cost burden.

Substandard housing and overcrowding are also more likely to impact renters. There are 395 renter households lacking complete kitchen or baths compared to 84 owners (Table 7). Additionally, 1,439 renters are overcrowded compared to 280 owners (Table 11). While most overcrowded households are single-family households, about 9% of overcrowded renters and 47% of overcrowded owners are multiple, unrelated households living together.

Populations and household types most impacted by homelessness – another priority housing issue in Fulton County – are described in NA-40, Homeless Needs Assessment.

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

Individuals and families with an imminent risk of residing in shelters or becoming unsheltered typically have a combination of financial factors present in their lives including extremely low incomes, rents that are more than 30 to 50% of their incomes, and unaffordable childcare, medical, or transportation costs. Scarcity of housing affordable to individuals and families with very low incomes place vulnerable households at an even greater risk of eviction or homelessness. Unemployment, past evictions, poor credit, criminal histories, and chronic physical or mental disabilities are additional potential barriers to securing housing. In addition to economic factors, substance abuse and family problems (domestic violence and abuse, divorce, and death of a family member) are contributing factors to homelessness.

For formerly homeless families and individuals nearing the end of rapid re-housing assistance, affordable permanent housing is a critical need to prevent a return to homelessness. Other needs include increased, sustainable income (earned and unearned); access to Social Security disability and other mainstream benefits; linkages to health, mental health, and legal services; access to affordable transportation and childcare; and budget counseling, life skills, and other case management and supportive services.

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

The Fulton County Continuum of Care does not prepare estimates of the number of households at-risk of homelessness. The County allocates Emergency Shelter Grant (ESG) funds for homelessness prevention and rapid rehousing and will continue to serve at-risk households over the next five years. According to ESG standards, households eligible for homelessness prevention assistance include those with incomes under 30% of the area median income who lack sufficient resources and support networks necessary to



retain housing without assistance and participate in an initial consultation to determine eligibility and assess needs.

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

The most common reasons for homelessness are economic – lack of sufficient income coupled with unaffordable rents or homeowner costs. Renters with incomes under 30% AMI and housing cost burdens over 50% are at elevated risk of homelessness. Destabilizing events such as a job loss, reduction in work hours, medical emergency / condition, or loss of Supplemental Security Income (SSI) or Social Security Disability (SSDI) benefits are among the factors that can trigger homelessness.

### **Housing Needs Related to COVID-19 Impacts:**

On March 2, 2020, the Georgia Department of Public Health (DPH) confirmed the first cases of COVID-19 in Georgia. By mid May, DPH reported over 34,000 COVID-19 infections in the state, over 6,100 hospitalizations, and 1,461 deaths as a result of the virus.<sup>2</sup> Georgia DPH tracks cases by county and not city, however, Fulton (including all cities) had the highest number of COVID-19 in the state with 3,530 confirmed cases between them resulting in 147 deaths. On top of these health effects, the pandemic has precipitated historically unprecedented levels of unemployment. Initial claims for unemployment insurance in Fulton County for the month of March 2020 numbered 44,097 compared with a figure of 1,815 for March of 2019, a 2,330% increase.<sup>3</sup> The sharp increase in unemployment claims and the rapid rise in COVID-19 cases are early indicators of a crisis widely expected to continue growing as the effects ripple into housing, education, and other facets of daily life.

Needs faced by Fulton County residents related to COVID-19 have been extensive and varied. Residents with the virus face healthcare challenges and those with weakened immune systems, such as people living with HIV/AIDS, are particularly susceptible to infection. Small business owners and employees of closed businesses face economic hardship, leaving many unable to provide groceries and food for their families and unable to make rent or mortgage payments. Suspension of eviction filings do not apply to private sector landlords and even those offering temporary forbearance could require large balloon payments in the future to bring accounts current. Essential workers who continue to work during the shutdown face childcare challenges due to schools being closed and transportation needs because of significant cuts and reorganization of public transportation service. The COVID-19 pandemic will exacerbate affordability issues and other housing needs discussed in this section as job losses, healthcare challenges, and related anxiety, stress, and mental health needs impact Fulton County residents.

---

<sup>2</sup> Georgia Department of Public Health Daily Status Report, 5/1/2020. <https://dph.georgia.gov/covid-19-daily-status-report>.

<sup>3</sup> Georgia Department of Labor, Statewide Unemployment Insurance Initial Claims Report, March 2020. <https://dol.georgia.gov/current-labor-force-data-and-graphs>.

## NA-15 DISPROPORTIONATELY GREATER NEED: HOUSING PROBLEMS – 91.205 (B)(2)

### Introduction

This section assesses the housing needs of racial and ethnic groups at various income levels in comparison to needs at that income level as a whole to identify any disproportionately greater needs. According to HUD, a disproportionately greater need exists when members of a racial or ethnic group at a given income level experience housing problems at a greater rate (10 percentage points or more) than the income level as a whole. Tables 13 through 16 identify the number of households experiencing one or more of the four housing problems by householder race, ethnicity, and income level. The four housing problems include: (1) cost burdens (paying more than 30% of income for housing costs); (2) overcrowding (more than 1 person per room); (3) lack of complete kitchen facilities; and (4) lack of complete plumbing facilities.

Income classifications include:

- Very low income – up to 30% of area median income (AMI) or \$26,200 for a family of four;
- Low income – 30 to 50% AMI or \$26,201 to \$41,350 for a family of four;
- Moderate income – 50 to 80% AMI or \$41,351 to \$66,150 for a family of four; and
- Middle income – 80 to 100% AMI or \$66,151 to \$82,700 for a family of four.

### 0% to 30% of Area Median Income

Out of 14,624 very low-income households in Fulton County, 11,487 (79%) have one or more housing problems. Black or African American households are most likely to have a housing need (8,713 households or 85%) while white households are the least likely to have a housing need (1,802 households or 59%). Latino households, the third largest racial or ethnic group in Fulton County, have a housing need rate of 75% at very low incomes (698 households with needs). No group has a disproportionate housing need according to HUD's definition.

**TABLE 13 - DISPROPORTIONALLY GREATER NEED 0 TO 30% AMI**

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	11,487	1,804	1,333
White	1,802	999	264
Black / African American	8,713	629	858
Asian	118	40	60
American Indian, Alaska Native	10	0	20
Pacific Islander	0	0	0
Hispanic	698	114	120

**Note:** The four housing problems are: (1) Lacks complete kitchen facilities; (2) Lacks complete plumbing facilities; (3) More than one person per room; and (4) Cost burden greater than 30%.

**Data Source:** 2011-2015 CHAS

### 30% to 50% of Area Median Income

Eighty-four percent (84%) of households with low incomes (between 30 and 50% AMI) have one or more housing needs (9,679 households). While no group has a disproportionate housing need according to HUD's definition, there is a substantial difference in rates of need between white households and other racial and ethnic groups. Sixty-five percent (65%) of low-income white households have a housing need (1,658 households) compared to 90% of African Americans (7,105 households), 88% of Asians (105 households), and 81% of Latinos (673 households).

**TABLE 14 - DISPROPORTIONALLY GREATER NEED 30 TO 50% AMI**

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	9,679	1,879	0
White	1,658	894	0
Black / African American	7,105	798	0
Asian	105	15	0
American Indian, Alaska Native	30	10	0
Pacific Islander	0	0	0
Hispanic	673	158	0

**Note:** The four housing problems are: (1) Lacks complete kitchen facilities; (2) Lacks complete plumbing facilities; (3) More than one person per room; and (4) Cost burden greater than 30%.

**Data Source:** 2011-2015 CHAS

### 50% to 80% of Area Median Income

Housing needs are less common for moderate income households than for very low- and low-income households. In the 50 to 80% AMI income band, 56% of households have a housing problem (9,020 households). These rates range from 39% for Asian households (170 with needs) to 59% for Black households (6,734 with needs). No group has a disproportionate housing need according to HUD's definition.

**TABLE 15 - DISPROPORTIONALLY GREATER NEED 50 TO 80% AMI**

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	9,020	7,010	0
White	1,538	1,584	0
Black / African American	6,734	4,643	0
Asian	170	265	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	15	0
Hispanic	518	388	0

**Note:** The four housing problems are: (1) Lacks complete kitchen facilities; (2) Lacks complete plumbing facilities; (3) More than one person per room; and (4) Cost burden greater than 30%.

**Data Source:** 2011-2015 CHAS

### 80% to 100% of Area Median Income

About one-quarter (24%) of middle-income households (incomes between 80 and 100% AMI) have a housing problem (2,704 households). Rates range from 8% for Hispanic households (38 with a housing need) to 30% for white households (938 with a need), but no group has a disproportionate need according to HUD's definition.

TABLE 16 - DISPROPORTIONALLY GREATER NEED 80 TO 100% AMI

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	2,704	8,474	0
White	938	2,240	0
Black / African American	1,669	5,404	0
Asian	15	240	0
American Indian, Alaska Native	0	25	0
Pacific Islander	0	0	0
Hispanic	38	424	0

**Note:** The four housing problems are: (1) Lacks complete kitchen facilities; (2) Lacks complete plumbing facilities; (3) More than one person per room; and (4) Cost burden greater than 30%.

**Data Source:** 2011-2015 CHAS

## Discussion

Overall, while housing problems are most common at lower incomes, they are relatively prevalent among all income groups. Housing need rates range from 84% for low-income households to 24% for middle-income households. Black or African American households make up the majority of households in all income groups in Fulton County, as well as the majority of households with one or more housing problem.

No racial or ethnic group has a disproportionate housing need in any income band according to HUD's definition. In income groups under 80% AMI, white households are less likely to have a housing need than African American and Hispanic households.

## NA-20 DISPROPORTIONATELY GREATER NEED: SEVERE HOUSING PROBLEMS – 91.205 (B)(2)

### Introduction

This section assesses the severe housing needs of racial and ethnic groups at various income levels in comparison to severe needs at that income level as a whole to identify any disproportionately greater needs. Like the preceding analysis, this section uses HUD's definition of disproportionately greater need, which occurs when one racial or ethnic group at a given income level experiences housing problems at a rate that is at least 10 percentage points greater than the income level as a whole.

Tables 17 through 20 identify the number of households with one or more severe housing needs by householder race and ethnicity. The four severe housing problems include: (1) severe cost burden (paying more than 50% of income for housing and utilities); (2) severe crowding (more than 1.5 people per room); (3) lack of complete kitchen facilities; and (4) lack of complete plumbing facilities.

Income classifications include:

- Very low income – up to 30% of area median income (AMI) or \$26,200 for a family of four;
- Low income – 30 to 50% AMI or \$26,201 to \$41,350 for a family of four;
- Moderate income – 50 to 80% AMI or \$41,351 to \$66,150 for a family of four; and
- Middle income – 80 to 100% AMI or \$66,151 to \$82,700 for a family of four.

### 0% to 30% of Area Median Income

Seventy percent (70%) of very low-income households (0 to 30% AMI) have a severe housing problem. While no racial or ethnic group has a disproportionate need according to HUD's definition, there is a considerable difference in need rates between white, Black, and Latino households. Forty-eight percent (48%) of white households (1,467 households) have a severe need compared to 71% of Hispanic households (653 households) and 78% of African American households (7,973 households).

**TABLE 17 – SEVERE HOUSING PROBLEMS 0 TO 30% AMI**

Severe Housing Problems	Has one or more of four severe housing problems	Has none of the four severe housing problems	Household has no/negative income, but none of the other severe housing problems
Jurisdiction as a whole	10,317	2,988	1,333
White	1,467	1,344	264
Black / African American	7,973	1,379	858
Asian	110	48	60
American Indian, Alaska Native	10	0	20
Pacific Islander	0	0	0
Hispanic	653	153	120

**Note:** The four severe housing problems are: (1) Lacks complete kitchen facilities; (2) Lacks complete plumbing facilities; (3) More than 1.5 persons per room; and (4) Cost burden greater than 50%.

**Data Source:** 2011-2015 CHAS

### 30% to 50% of Area Median Income

At low incomes, 43% of households have a severe housing need. For most racial and ethnic groups, rates of severe problems range from 39% (for white households) to 50% (for Asian households). However, one group – American Indians and Alaska Natives – has a disproportionately high rate of severe housing needs, with 30 out of 40 households experiencing a severe need (75%). It should be noted, however, that the small number of observations within this group makes it more susceptible to sampling error.

TABLE 18 – SEVERE HOUSING PROBLEMS 30 TO 50% AMI

Severe Housing Problems	Has one or more of four severe housing problems	Has none of the four severe housing problems	Household has no/negative income, but none of the other severe housing problems
Jurisdiction as a whole	4,962	6,589	0
White	1,007	1,559	0
Black / African American	3,390	4,520	0
Asian	60	60	0
American Indian, Alaska Native	30	10	0
Pacific Islander	0	0	0
Hispanic	392	446	0

**Note:** The four severe housing problems are: (1) Lacks complete kitchen facilities; (2) Lacks complete plumbing facilities; (3) More than 1.5 persons per room; and (4) Cost burden greater than 50%.

**Data Source:** 2011-2015 CHAS

### 50% to 80% of Area Median Income

At moderate incomes, 13% of households have a severe housing problem. There is little variation in these rates, which range from 10% for Asians (45 households with severe needs) to 16% for Hispanics (142 households with severe needs). No group has a disproportionate need according to HUD's definition.

TABLE 19 – SEVERE HOUSING PROBLEMS 50 TO 80% AMI

Severe Housing Problems	Has one or more of four severe housing problems	Has none of the four severe housing problems	Household has no/negative income, but none of the other severe housing problems
Jurisdiction as a whole	2,083	13,969	0
White	439	2,694	0
Black / African American	1,389	10,000	0
Asian	45	385	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	15	0
Hispanic	142	748	0

**Note:** The four severe housing problems are: (1) Lacks complete kitchen facilities; (2) Lacks complete plumbing facilities; (3) More than 1.5 persons per room; and (4) Cost burden greater than 50%.

**Data Source:** 2011-2015 CHAS

### 80% to 100% of Area Median Income

Only a small share of middle-income households in Fulton County (6% or 673 households) have a severe housing need. Rates range from 0% for American Indian and Alaska Native households to 10% for white households. No group has a disproportionate housing need according to HUD's definition.

**TABLE 20 – SEVERE HOUSING PROBLEMS 80 TO 100% AMI**

Severe Housing Problems	Has one or more of four severe housing problems	Has none of the four severe housing problems	Household has no/negative income, but none of the other severe housing problems
Jurisdiction as a whole	673	10,508	0
White	315	2,879	0
Black / African American	284	6,794	0
Asian	15	240	0
American Indian, Alaska Native	0	25	0
Pacific Islander	0	0	0
Hispanic	38	424	0

**Note:** The four severe housing problems are: (1) Lacks complete kitchen facilities; (2) Lacks complete plumbing facilities; (3) More than 1.5 persons per room; and (4) Cost burden greater than 50%.

**Data Source:** 2011-2015 CHAS

### Discussion

Like all housing problems, severe housing problems are most common at lower incomes. Seventy percent (70%) of very low-income households have a severe housing problem compared to only 13% of moderate-income and 6% of middle-income households. At very low incomes, Black and Hispanic households are considerably more likely to have severe housing problems than white households (78% and 71%, respectively, versus 48%). At low, moderate, and middle incomes there is less variation in severe housing need rates by race and ethnicity. Among all income levels and racial and ethnic groups considered here, only one met HUD's definition of a disproportionate need: low income American Indians and Alaska Natives, 75% of whom had a severe housing need compared to 43% for that income group overall. However, that rate was based on a relatively low number of observations: 40 American Indian or Alaska Native households.



## NA-25 DISPROPORTIONATELY GREATER NEED: HOUSING COST BURDENS – 91.205 (B)(2)

### Introduction

This section assesses the need of any racial or ethnic group that has a disproportionately greater need in comparison the needs of that category of need as a whole. While the preceding sections assessed all housing and severe housing problems, Table 21 focuses only on what share of their income households spend on housing. Data is broken down into groups spending less than 30% of income on housing costs, those paying between 30 and 50% (i.e., with a cost burden), and those paying over 50% (i.e., with a severe cost burden). The final column, “no/negative income,” identifies households without an income, for whom housing as a share of income was not calculated.

### Housing Cost Burden

**TABLE 21 – HOUSING COST BURDENS BY RACE AND ETHNICITY**

Housing Cost Burden	Less than 30%	30-50%	More than 50%	No / negative income (not computed)
Jurisdiction as a whole	64,967	19,470	17,285	1,374
White	25,615	4,789	3,184	274
Black / African American	31,685	13,150	12,639	898
Asian	3,795	343	235	60
American Indian, Alaska Native	59	19	25	20
Pacific Islander	25	0	0	0
Hispanic	3,017	1,092	926	120
<b>Share of Total Households by Race and Ethnicity</b>				
Jurisdiction as a whole	63%	19%	17%	1%
White	76%	14%	9%	1%
Black / African American	54%	23%	22%	2%
Asian	86%	8%	5%	1%
American Indian, Alaska Native	48%	15%	20%	16%
Pacific Islander	100%	0%	0%	0%
Hispanic	59%	21%	18%	2%

Data Source: 2011-2015 CHAS

### Discussion

Table 21 shows that approximately 36% of all households in Fulton County are considered housing cost burdened (spending more than 30% of income on housing). Black/African American households make up

the majority of cost burdened households in Fulton County (70% or 25,789 Black households out of 36,755 total cost burdened households).

Asian and White households have lower rates of cost burdens (13% and 23%, respectively) compared to Hispanic and Black households (39% and 45%, respectively). However, no group has a disproportionate rate of cost burdens per HUD's definition.

Households spending more than 50% of income on housing are considered severely cost burdened. Seventeen percent (17%) of all households in Fulton County have a severe cost burden. Again, Black households comprise the majority (12,639 households, or 73%). Several groups have relatively low levels of severe cost burdens: Pacific Islanders (0%), Asians (5%), and white households (9%). Rates for Hispanic, American Indian, and Black households are higher (from 18 to 22%). However, no group has a disproportionate rate of cost burdens per HUD's definition.

---

## **NA-30 DISPROPORTIONATELY GREATER NEED: DISCUSSION – 91.205(B)(2)**

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

CHAS data indicates that one racial or ethnic group has disproportionately greater severe housing problems than the income category as a whole. Seventy-five percent (75%) of low-income American Indians and Alaska Natives have a severe housing need compared to 43% of all low-income households. However, that rate was based on a relatively low number of observations: 40 American Indian or Alaska Native households, of whom 30 have a severe housing problem.

While Black and Latino households do not exhibit disproportionate housing needs, at very low-, low-, and moderate-income bands (i.e., all income groups under 80% AMI) they are considerably more likely to face a housing need than white households. At very low incomes, 59% of white households have a housing need compared to 85% of African Americans and 75% of Hispanics. At low incomes, 65% of white households have a need compared to 90% of African Americans and 81% of Hispanics. Finally, at moderate incomes, 49% of white households have a need compared to 57% of African Americans and 57% of Hispanics.

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

Although not reflected in HUD's Comprehensive Housing Affordability Strategy (CHAS) data, point-in-time counts of the homeless population in Fulton County indicate that African American and Hispanic residents are more likely to be homeless than other racial and ethnic groups. Black residents make up 76% of the Fulton County Continuum of Care's homeless count compared to 46% of the overall population in the CoC area. Hispanic residents make up 12% of the latest homeless count compared to 7% of the overall population. Section NA-40 discusses homeless needs, including needs by race and ethnicity, in more detail.

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

Native American and Alaska Native residents, the only group showing a disproportionate housing need, are not clustered in any specific area or neighborhood within Fulton County.

Although not showing a disproportionate housing need by HUD's definition, African American and Hispanic residents had elevated shares of housing problems compared to white residents. Hispanic residents are not clustered in specific areas or neighborhoods within Fulton County, but African American residents are disproportionately likely to live in south Fulton County. Excluding the cities of Hapeville and Chattahoochee Hills, nearly all census tracts in south Fulton County are predominantly African American (i.e. greater than 50%), with several census tracts identifying rates of Black residency greater than 90%. Section MA-50 maps Fulton County's population by race and ethnicity and locations with highest rates of housing need, showing that many tracts with high housing cost burdens are in south Fulton County.

---

## NA-35 PUBLIC HOUSING – 91.205(B)

### Introduction

Residents in Fulton County's entitlement jurisdiction (i.e., Fulton County outside of the cities of Atlanta, Roswell, and Sandy Springs) are served by several housing authorities: the Housing Authority of Fulton County, the Housing Authority of the City of East Point, the Housing Authority of the City of College Park, the Housing Authority of the City of Fairburn, the Housing Authority of the City of Union City, and the Housing Authority of the City of Palmetto.

The Housing Authority of Fulton County (HAFC) serves the most residents in Fulton County, primarily through the administration of Housing Choice Vouchers, project-based vouchers/RAD, and LIHTC development. The Housing Authorities of East Point and College Park also administer Housing Choice Vouchers, as well as own about 400 public housing units combined. The Housing Authorities of Fairburn, Palmetto, and Union City are considerably smaller, together serving about 60 households with public housing. Public housing in Fairburn is managed by the East Point Housing Authority; the Housing Authorities of East Point and Palmetto are also co-managed.

Totals in Use

TABLE 22 - PUBLIC HOUSING BY PROGRAM TYPE

Program Type									
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project -based	Tenant -based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled*
# of units vouchers in use	1	0	686	3,765	10	3,695	18	0	0

\*Note: Includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-Year, and Nursing Home Transition

Data Source: PIC (PIH Information Center)

## Characteristics of Residents

**TABLE 23 – CHARACTERISTICS OF PUBLIC HOUSING RESIDENTS BY PROGRAM TYPE**

	Program Type							
	Certificate	Mod-Rehab	Public Housing	Vouchers				
				Total	Project - based	Tenant - based	Special Purpose Voucher	
							Veterans Affairs Supportive Housing	Family Unification Program
Average annual income								
Average length of stay								
Average household size								
# homeless at admission	0	0	14	0	0	0	0	0
# of elderly program participants (>62)	0	0	171	318	4	310	2	0
# of disabled families	0	0	117	611	3	590	12	0
# of families requesting accessibility features	1	0	686	3,765	10	3,695	18	0
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0
# of domestic violence victims	0	0	0	0	0	0	0	0

**Data Source:** PIC (PIH Information Center)

## Race of Residents

**TABLE 24 – RACE OF PUBLIC HOUSING RESIDENTS BY PROGRAM TYPE**

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project -based	Tenant -based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled*
White	0	0	78	114	1	111	1	0	0
Black/African American	1	0	600	3,648	9	3,581	17	0	0
Asian	0	0	5	0	0	0	0	0	0
American Indian/Alaska Native	0	0	1	3	0	3	0	0	0
Pacific Islander	0	0	2	0	0	0	0	0	0
Other	0	0	0	0	0	0	0	0	0

**\*Note:** Includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-Year, and Nursing Home Transition

**Data Source:** PIC (PIH Information Center)

## Ethnicity of Residents

**TABLE 25 – ETHNICITY OF PUBLIC HOUSING RESIDENTS BY PROGRAM TYPE**

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled*
Hispanic	0	0	12	32	1	31	0	0	0
Not Hispanic	1	0	674	3,733	9	3,664	18	0	0

**\*Note:** Includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-Year, and Nursing Home Transition

**Data Source:** PIC (PIH Information Center)

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

Data from HUD's Picture of Subsidized Households shows that there are about 64 households with one or more members with a disability living in public housing in Fulton County, making up about 9% of all Fulton County public housing units. There are an estimated 450 households with one or more disabled members using Housing Choice Vouchers, which represents about 12% of available vouchers in Fulton County. Stakeholder input indicates that many voucher holders have difficulty finding units that both accept HCVs and are affordable with a voucher. For people with disabilities that require physically accessible units, this search is often even more difficult.

For applicants on public housing or Housing Choice Voucher wait lists, the wait for an affordable and accessible unit can be long. HUD's Picture of Subsidized Households data shows that the average household holding an HCV administered by HAFC waited about 2.5 years before receiving it. Similar wait times are typical for public housing units.

Stakeholder input suggests a general need for more affordable housing options for people with disabilities. As many people with disabilities live on limited incomes, often only \$750 per month from Supplemental Security Income (SSI), there are effectively no decent, accessible, affordable housing options other than public housing or a voucher. Availability of additional units with accessibility features is the greatest need of this population.

### **Describe the most immediate needs of residents of public housing and housing choice voucher holders.**

HAFC identifies self-sufficiency, job training, adult education, transportation, childcare, after school programs, child educational enrichment, and health-related assistance as major needs among the households they serve. HAFC and other HCV programs are designed to allow mobility, so that voucher holders can move to neighborhoods of their choice. HAFC assists families in identifying units located in all areas of unincorporated Fulton County, including low poverty neighborhoods.

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

Needs of public housing residents and voucher holders are different from those of Fulton County's overall low- and moderate-income population only in that housing authority residents are housed in stable and decent housing. With this need met, residents are able to work toward meeting other needs that families typically face in addition to housing insecurity, such as childcare, healthcare, employment, transportation, and food. The HAFC works to strengthen families in Fulton County through essential self-sufficiency skills and employment assistance.



---

**NA-40 HOMELESS NEEDS ASSESSMENT – 91.205(C)****Introduction**

This section provides an assessment of Fulton County's homeless population and its needs. Fulton County conducts an annual homeless "Point-in-time Count" during the last 2 weeks of January. The 2019 point-in-time count for Fulton County was held on January 24, 2019. It counted 632 homeless persons in total, including persons in households with children (232), persons in households with only children (24), and persons in households without children (376).

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

Of the 632 homeless persons counted in the point-in-time count, 77 people were counted as chronically homeless (12%). Of the 77 chronically homeless persons, 51 were sheltered in emergency shelter (66%), and 26 were unsheltered (34%).

In addition to chronically homeless households, the 2019 point-in-time count counted 46 veteran households with a total of 54 people; 57 unaccompanied youth households with a total of 63 people; and two parenting youth households with a total of four people. Of the 54 homeless veterans, seven were chronically homeless; of the 63 homeless unaccompanied youth, three were chronically homeless; and of the four people in parenting youth households, none were chronically homeless.

Georgia State University's Atlanta Youth Count! Homeless Youth Count and Needs Assessment (2016) estimated that in a typical summer month, there are approximately 3,374 homeless and runaway youth living on the streets, in shelters, or in other precarious housing situations in the Atlanta metro area. The study noted that the vast majority of homeless youth surveyed were Black or African-American (71.0%), 16% were multi- or bi-racial, 5.3% were white, 3.9% were Hispanic, and less than 1% were Native American. The majority were cisgender men (60.5%) and approximately 6.5% were transgender or gender nonconforming individuals. The average age of homeless youth was 21.5%. The majority were between the ages of 20-25 (70.9%), but almost 5% were minors (age 14 to 17 years old).<sup>4</sup>

Note that these figures do not represent the entire homeless population in the county, but rather the number of homeless that were sheltered and unsheltered during a point-in-time count. As the inventory of homeless facilities in the area shows, a considerably higher number of homeless persons are assisted within Fulton County than the point-in-time count of chronically homeless reflects.

---

<sup>4</sup> Georgia State University. (2016). Atlanta Youth Count! Homeless Youth Count and Needs Assessment. Retrieved from: [https://atlantayouthcount.weebly.com/uploads/7/9/0/5/79053356/aycna\\_final\\_report\\_may\\_2016\\_final.pdf](https://atlantayouthcount.weebly.com/uploads/7/9/0/5/79053356/aycna_final_report_may_2016_final.pdf)

**TABLE 26 – TOTAL SHELTERED AND UNSHELTERED HOUSEHOLDS AND PERSONS**

	Sheltered		Unsheltered	Total
	Emergency	Transitional		
Total number of households	292	87	72	451
Number of persons	440	116	76	632

Data Source: Fulton County Continuum of Care 2019 Point-In-Time Count

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

The 2019 point-in-time count identified 66 households with at least one adult and one child, which included a total of 232 people, 135 of which were under the age of 18. Of the 232 persons in households with at least one adult and one child, 226 (97%) were sheltered in emergency or transitional housing.

Of the 46 veteran households counted during the point-in-time count, six veteran households had at least one adult and one child. These six households included a total of 13 people, 6 of which were veterans. All of these veteran households with children were sheltered in either emergency or transitional housing.

**TABLE 27 – PERSONS IN HOUSEHOLDS WITH AT LEAST ONE ADULT AND ONE CHILD**

	Sheltered		Unsheltered	Total
	Emergency	Transitional		
Total number of households	48	16	2	66
Number of persons	181	45	6	232

Data Source: Fulton County Continuum of Care 2019 Point-In-Time Count

**TABLE 28 – VETERAN HOUSEHOLDS WITH AT LEAST ONE ADULT AND ONE CHILD**

	Sheltered		Unsheltered	Total
	Emergency	Transitional		
Total number of households	1	5	0	6
Number of persons	3	10	0	13

Data Source: Fulton County Continuum of Care 2019 Point-In-Time Count

### Describe the nature and extent of homelessness by racial and ethnic group.

The point-in-time count looked at the number of sheltered and unsheltered homeless individuals in Fulton County by race and ethnicity. The count found that 76% of all sheltered and unsheltered individuals were Black, 19% were white, and 4% were multiple races. Asian, American Indian and Pacific Islander homeless

individuals each comprised less than 1% of sheltered and unsheltered individuals. Regarding ethnicity, the count found that 12% of the total sheltered and unsheltered homeless population in Fulton County were Hispanic/Latino, and 88% were non-Hispanic/Latino.

The proportion of sheltered individuals varied by race and ethnicity. Of the total Black population experiencing homelessness, 414 were sheltered (86%), and 65 were unsheltered (14%). Of the total white population experiencing homelessness, 113 were sheltered (92%), and 9 were unsheltered (8%). Of the total Hispanic/Latino population experiencing homelessness, 75 were sheltered (97%), and 2 were unsheltered (3%).

While all racial and ethnic groups were more likely to be sheltered in emergency shelters than transitional housing or safe havens, the proportion of population utilizing these facilities varied by race and ethnicity. Seventy-five percent (75%) of the sheltered Black population were in an emergency shelter, while 25% were in transitional housing. The sheltered white and Hispanic/Latino populations were less likely to utilize transitional housing than the Black population. Specifically, 92% of the sheltered white population were in an emergency shelter, and 8% were in transitional housing. Ninety-three percent (93%) of the sheltered Hispanic/Latino population was in an emergency shelter, and 7% was in transitional housing.

**TABLE 29 – RACE OF SHELTERED AND UNSHELTERED HOMELESS PERSONS**

	Sheltered			Unsheltered	Total
	Emergency	Transitional	Safe Haven		
White	103	10	0	9	122
Black or African American	311	103	0	65	479
Asian	3	0	0	1	4
American Indian or Alaska Native	0	0	0	0	0
Native Hawaiian or Other Pacific Islander	1	0	0	0	1

Data Source: Fulton County Continuum of Care 2019 Point-In-Time Count

**TABLE 30 – RACE OF SHELTERED AND UNSHELTERED HOMELESS PERSONS**

	Sheltered		Unsheltered	Total
	Emergency	Transitional		
Non-Hispanic / Non-Latino	370	111	74	555
Hispanic / Latino	70	5	2	77

Data Source: Fulton County Continuum of Care 2019 Point-In-Time Count

**Describe the nature and extent of unsheltered and sheltered homelessness.**

The 2019 point-in-time count counted a total of 632 homeless persons, including 76 unsheltered and 556 sheltered persons. Of the 556 people with shelter, 440 (79%) were in emergency shelters, and 116 (21%) were in transitional housing.

## **Discussion**

Data from both the point-in-time count and stakeholder input indicate a high level of need for homelessness services in North and South Fulton County. All homeless needs were ranked by more than 60% of survey respondents as high needs, including homelessness prevention, transitional/ supportive housing programs, access to homeless shelters, permanent housing, and outreach to homeless persons.

Public meeting and focus group participants noted that homelessness in North and South Fulton is often less visible than that in the City of Atlanta, as people are living with relatives, in vehicles, or in abandoned buildings. Stakeholders emphasized that homeless individuals often have many needs, including mental health, counseling, and housing, among others, and getting assistance for these needs is generally a cumbersome process. Participants in interviews and focus groups noted a particular need for:

- Housing that provides access to services and needs such as food, mental health services, and workforce development.
- Emergency shelter facilities. Residents noted a particular lack of shelter facilities and services in South Fulton. In North Fulton, there is some emergency housing for women with children that is always full, but there is nothing in the community for unaccompanied adults.
- Supportive services for people returning from prison to reintegrate them with society and prevent them from becoming homeless.
- Expanded mental health services.  
Outreach services such as showering services and laundry services.
- A one-stop shop for people to access clothing, food, childcare, workforce development, and other needs.
- Training on financial literacy, personal finance, and credit scores.
- Permanent supportive housing. With the cutting of HOPWA funds, the need for permanent supportive housing is even greater across the region.
- A database of beds available. There is a potential to partner with United Way to strengthen their existing information. Directories need to be updated frequently.
- Housing available for use in rapid rehousing programs. Rapid rehousing money is available, but housing is hard to find because the individual has to qualify for the lease, etc. Organizations have used rapid rehousing money for prevention because they were unable to spend it for rapid rehousing.
- Street outreach to people who are homeless. People may prefer not to go to shelters because of rules. There is a need to work with street outreach teams to educate people about services that are available, including mental health and substance abuse services, and to bring services to individuals.

## NA-45 NON-HOMELESS SPECIAL NEEDS ASSESSMENT – 91.205 (B,D)

### Introduction

This section discusses the characteristics and needs of persons in various subpopulations of Fulton County who are not homeless but may require supportive services, including the elderly, persons with disabilities (mental, physical, developmental), persons with HIV/AIDS and their families, persons with alcohol or drug addiction, victims of domestic violence, and persons with a criminal record and their families. Note that within this section, Fulton County figures include the cities of Atlanta, Roswell, and Sandy Springs.

### Describe the characteristics of special needs populations in your community.

#### *Elderly and Frail Elderly*

According to the 2013-2017 ACS 5-year estimates, 15% of Fulton County's population is elderly – aged 65 and over. Four percent (4.2%) of the population is considered frail elderly, aged 75 and over. About one third (33.7%) of elderly individuals aged 65 and over in the county have a disability.

#### *Persons with Disabilities*

Within the county, 10% of all residents had one or more disabilities, including:

- Hearing difficulty – 2.0%
- Vision difficulty – 2.1%
- Cognitive difficulty – 4.3%
- Ambulatory difficulty – 6.0%
- Self-care difficulty- 2.3%
- Independent living difficulty – 4.9%

#### *Persons with HIV/AIDS and their Families*

As of 2016, there were approximately 13,544 persons living with HIV/AIDS in Fulton County.<sup>5</sup> The rate of people living with HIV in the county was 1,578 cases per 100,000 people in 2016.<sup>6</sup> 83.8% of people living with HIV are male, and 16.2% are female. The majority of people living with HIV in Fulton County are Black (71.7%), while smaller proportions are White (17.5%) and Hispanic or Latino (5.6%).

#### *Persons with Alcohol or Drug Addiction*

The region that includes Fulton County and its surrounding counties (Clayton, Fulton, Gwinnett, Newton, and Rockdale) had an estimated 5.2% rate of alcohol use disorder in the past year by individuals aged 12 and older, according to 2014-2016 data from the US Substance Abuse & Mental Health Data Archive (SAMHDA). During this same time period, cocaine use for the region was estimated at 2.7% of the

---

<sup>5</sup> AIDSVu, Emory University's Rollins School of Public Health in partnership with Gilead Sciences, Inc. and the Center for AIDS Research at Emory University (CFAR)

<sup>6</sup> Ibid.

population, and heroin use was estimated at 0.11%.<sup>7</sup> There were an estimated 472 drug overdose deaths in Fulton County from 2015 to 2017, a rate of 15 persons per 100,000 population.<sup>8</sup>

### *Victims of Domestic Violence*

The Centers for Disease Control estimates that 37.4% of women and 30.4% of men in Georgia have experienced any contact sexual violence, physical violence, or stalking by an intimate partner in their lifetimes.<sup>9</sup> This equates to an estimated 194,713 women and 148,898 men living in Fulton County, based on the county's 2017 total population of 1,010,420.<sup>10</sup> An estimated 45.5% of women and 49.9% of men in Georgia have experienced any psychological aggression by an intimate partner,<sup>11</sup> which equates to an estimated 236,883 women and 244,408 men living in Fulton County.

### *Re-entry Populations*

In the state of Georgia, an estimated 404,000 residents are on probation, and 21,000 are on parole.<sup>12</sup> While local data is not readily available, the large numbers of state residents under criminal justice supervision indicates a continuing need to address the housing and supportive service needs of this population in Fulton County.

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

The primary housing and supportive needs of these subpopulations (the elderly, frail elderly, persons with disabilities, persons with HIV/AIDS and their families, persons with alcohol or drug addiction, victims of domestic violence, and reentry populations) were determined by input from both service providers and the public through the survey, public meetings, and stakeholder interviews.

### *Safe and Affordable Housing*

For all vulnerable populations, the cost of housing is an issue. A high percentage of residents within these population subgroups live at or below the federal poverty level. Low incomes force many people with special needs to live in congregate care, have roommates or live with family. HUD's fair market rent documentation for FY 2020 estimates fair market rent for a two-bedroom unit in Fulton County zip codes as ranging from \$960 to \$1750 per month.<sup>13</sup> Almost all zip codes have fair market rents above \$1,000 for a 2-bedroom unit, and most fall in the range of \$1200 to \$1500. Stakeholders also noted that affordable

<sup>7</sup> Substance Abuse & Mental Health Data Archive. "Interactive National Survey on Drug Use and Health Substate Estimates." <https://pdas.samhsa.gov/saes/substate>

<sup>8</sup> County Health Rankings & Roadmaps. "Drug Overdose Deaths." <https://www.countyhealthrankings.org/app/georgia/2019/measure/factors/138/data?sort=sc-0>

<sup>9</sup> The National Intimate Partner and Sexual Violence Survey (NISVS) | 2010-2012 State Report. <https://www.cdc.gov/violenceprevention/pdf/NISVS-StateReportBook.pdf>

<sup>10</sup> 2013-2017 American Community Survey 5-Year Estimates for Total Population in Fulton County, Table DP05

<sup>11</sup> The National Intimate Partner and Sexual Violence Survey (NISVS) | 2010-2012 State Report. <https://www.cdc.gov/violenceprevention/pdf/NISVS-StateReportBook.pdf>

<sup>12</sup> Prison Policy Initiative. (n.d.) Georgia Profile. <https://www.prisonpolicy.org/profiles/GA.html>

<sup>13</sup> HUD User. "Atlanta-Sandy Springs-Roswell, GA HUD Metro FMR Area Small Area FY 2020 Fair Market Rents." [https://www.huduser.gov/portal/datasets/fmr/fmrs/FY2020\\_code/2020summary.odn](https://www.huduser.gov/portal/datasets/fmr/fmrs/FY2020_code/2020summary.odn)

housing can often be in unsafe areas, which may negatively affect all the vulnerable populations listed above.

### *Accessible Housing*

Housing may be inaccessible to vulnerable populations for a variety of reasons. Persons with criminal histories have a difficult time obtaining housing, which affects the economic stability of their families. Inability to obtain housing may also lead to recidivism amongst this population. Persons with disabilities may find that their housing options are not ADA compliant or are outside the service range for public transportation.

### *Physical and Mental Health and Treatment Services*

Access to healthcare is a need for vulnerable populations. Stakeholders and focus group participants noted a need for the County to work closely with providers of mental health services and to fund government agencies providing access to physical and mental health services. Stakeholders also emphasized a need for a wider range of drug and alcohol outpatient services.

### *Specialized Housing*

Specialized housing is often needed to target needs of specific vulnerable populations. For example, people with developmental disabilities and people with alcohol or drug addiction have specific housing needs that may be addressed through housing with wraparound services.

### *Workforce Development and Employment Services*

Workforce development and employment services are another need for vulnerable populations. These programs may include employment navigation, job training, education, transportation services, and case management focused on employment, among others. These services should be accessible through housing and schools as well as have a strong connection to the Department of Family and Children Services.

### *Programming Focused on Persons with Developmental Disabilities*

Programming are needed for persons with developmental disabilities to support the development of behavioral and emotional skills, to maintain social contact, and to develop employment skills.

### *Education/Combating Perceptions*

For adults with criminal histories, it may be especially difficult to find adequate housing. Several stakeholders noted that landlords often perceive persons with criminal histories as high-risk applicants. For this reason, stakeholders note that persons without criminal histories get priority over persons with criminal histories. Furthermore, failure to report criminal histories, particularly criminal records that are obtained while a person or their relatives are stably housed, can lead to eviction.



### Outreach

Outreach to vulnerable populations to ensure they are aware of available services is another need. This includes development of relationships and trust so that people feel comfortable seeking out needed services. There is also a need to provide clarity in marketing and in public buildings about what services are available.

### Discuss the size and characteristics of the population with HIV/AIDS and their families within the eligible Metropolitan Statistical Area.

The Atlanta-Sandy-Springs-Roswell region ranks fourth among Metropolitan Statistical Areas (MSAs) in the rate of diagnoses of HIV infection, as of 2016.<sup>14</sup> The Centers for Disease Control reports that in 2016, the Atlanta-Sandy Springs-Roswell region had 1,523 new HIV diagnoses,<sup>15</sup> a rate of new diagnoses of 32 per 100,000 population. Of these new diagnoses, 1,262 were adult and adolescent men and 261 were adult and adolescent women. By the end of 2015, there were a total of 31,163 persons living with a positive HIV diagnosis in the region, or 666.5 cases per 100,000 population. Of the total persons living with HIV in the region, 24,558 are adult and adolescent men and 6,605 are adult and adolescent women. The CDC reports that 1,115 of the 1,262 newly-diagnosed men contracted HIV from male-to-male sexual contact. 241 of the 261 newly-diagnosed women contracted HIV from heterosexual contact.

Men aged 25-34 had the highest number of new cases (506), followed by teens and young men aged 13-24 (344 cases). Although younger men tended to be diagnosed more frequently, more than half of adult men living with the disease are over age 45 (12,551), and about one in five are aged 55 and over (5,027). New diagnoses for women occurred across all age groups, with 44 women aged 55+, 60 women aged 45-54, 46 women aged 35-44, 76 women aged 25-34 and 35 aged 13-24 diagnosed with HIV in 2016. Similar to men living with HIV, more than half of women living with HIV are over 45 (56%), and almost one fourth (24%) are aged 55 and over.

By race and ethnicity, the largest number of new diagnoses occurred amongst Black and white adult and adolescent males. There were 922 new diagnoses for Black males, 179 for white males, 107 for Hispanic/Latino males, 13 for Asian males and 2 for American Indian/Alaskan native males. Black males also experienced the highest rate of infection at 129.4 cases per 100,000 persons, compared to 15.4 for white males and 46.7 for Hispanic males. There were 15,935 Black male adults or adolescents living with the disease, the highest number of any population group in the region. Black women had the highest number of new diagnoses amongst women, with 211 of the 261 new cases among women in 2016. Black women also experienced the highest rate of new diagnoses among women at 24.3 per 100,000 compared to 5.2 for Hispanic women and 1.8 for White women. Black women had the highest numbers for women living with HIV in the region, making up 5,298 of the 6,605 women in the region living with HIV.

<sup>14</sup> CDC. "Diagnoses of HIV Infection among Adults and Adolescents in Metropolitan Statistical Areas – United States and Puerto Rico, 2016." <https://www.cdc.gov/hiv/pdf/library/reports/surveillance/cdc-hiv-surveillance-supplemental-report-vol-23-2.pdf>

<sup>15</sup> Ibid.



NA-50 NON-HOUSING COMMUNITY DEVELOPMENT NEEDS – 91.215 (F)

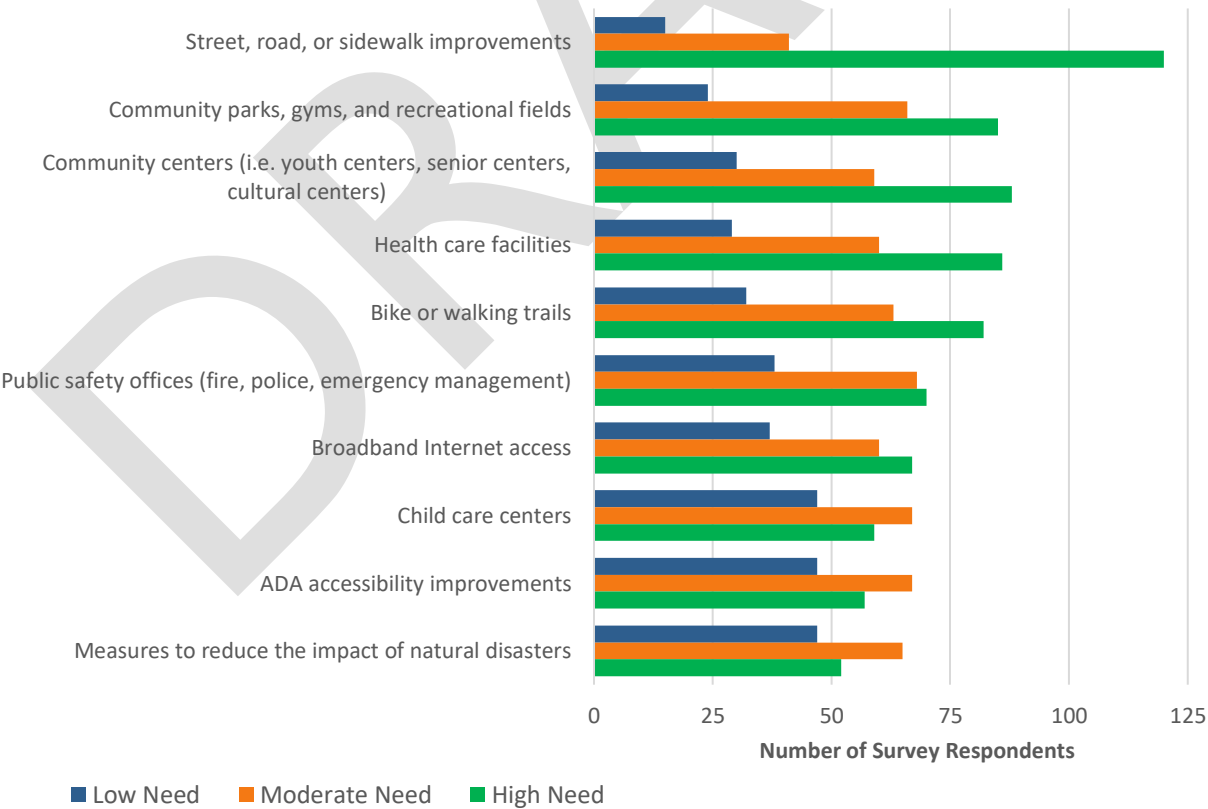
Describe the jurisdiction’s need for public facilities.

Buildings and infrastructure open to the general public, whether owned by the government or by nonprofits, may be considered public facilities under the Community Development Block Grant (CDBG) program. Fulton County’s needs in this area commonly identified through community input include:

- Community parks, gyms, and recreational fields, including recreational activities for youth and access to wellness facilities
- Health care facilities
- Community centers and facilities (i.e, youth centers, senior centers)
- Homelessness facilities, including emergency shelters, warming centers, mental health centers, service centers that provide access to a variety of resources, transitional housing for homeless youth, and permanent supportive housing

The chart below shows the public facility and infrastructure needs as ranked by survey respondents in the county.

FIGURE 1 – FULTON COUNTY PUBLIC FACILITY AND INFRASTRUCTURE NEEDS FROM THE COMMUNITY SURVEY



Public facility goals identified in the Fulton County Strategic Plan and other local plans include:

- Prioritize recreational facility investments and programs based on activities that 1) Fulton County residents indicate are high priority, 2) have been documented to produce healthy outcome for participants, 3) can leverage external funding and resources.
- Prioritize cultural facility investments and programs based on activities that 1) Fulton County residents indicate are high priority, 2) reach under-served populations within the county, 3) can leverage external funding and resources.
- Encourage cooperative efforts between the city, county and school district to provide adequate facilities for community activities and needs (i.e. senior and youth centers).

Public facility needs identified by Fulton County's cooperating cities via a survey about capital improvement projects include:

#### City of Alpharetta

- Park development on recently-acquired properties in an effort to have a park within walking distance of every residence. Stormwater water park proposed in the North Point area. Gateway park proposed to connect the Big Creek Greenway to the North Point area.
- Continued trail system expansion.

#### City of Chattahoochee Hills

- Park improvement needs include parking and parking kiosks, maintenance and operating equipment, boat ramp, restroom facilities, WiFi capabilities, playground equipment, site improvements, pavilions and seating areas.
- ADA improvements to restrooms and parking lots at city parks.
- City hall improvement or replacement. Public works building for equipment storage.

#### City of College Park

- Charles E. Phillips Park improvement, including a splash pad, walking path upgrade, and playground equipment.
- General park system upgrades to address deferred court replacements, stormwater management issues, and outdated public restroom and playground facilities.

#### City of East Point

- Increased parking capacity in downtown.
- Park needs include ADA accessibility improvements, additional and improved lighting, additional seating around playground equipment, modern playgrounds, and outdoor fitness stations and equipment.

#### City of Fairburn

- Variety of park improvements at Cora Robinson Park and Duncan Park (lighting, trails, picnic areas, WiFi, exercise equipment, community center with space for variety of indoor activities, and others).
- Additional parks and trails needed, including downtown and on south side of city.
- Preserve and increase greenspace.

## City of Hapeville

- New playground equipment and facilities. New track, fields, and equipment.

## City of Milton

- Improvements to active (Providence Park, Thomas Byrd house, and former Milton Country Club) and passive parks (Birmingham Park trails, former Milton Country Club, recently-acquired greenspace).

## City of Mountain Park

- Picnic table replacement and lake dredging to allow boating again.

## City of Palmetto

- Routine maintenance only; no renovation planned.

## City of Union City

- Trail improvements, including connections to residential areas and seating along park trails.
- Ball field and playground equipment improvement for ADA accessibility.
- Community garden designed for seniors.
- Improvements to mini amphitheater, including bathrooms, concession area, and additional parking.
- Near park space along South Fulton Parkway and neighborhood parks in west part of city.
- Satellite parks and recreation office.

## **How were these needs determined?**

The public facility needs listed above are based on input from multiple stakeholders consulted through interviews, focus groups, public meetings, and surveys targeted to residents and municipalities. These stakeholders included County and City staff and elected officials, Fulton County Housing Authority staff, nonprofit organizations, homeless housing and service providers, organizations serving people with disabilities, housing developers, civic organizations, and Fulton County residents.

Needs were also determined based on a review of previous local and regional plans, such as the Fulton County Strategic Plan (2016-2019), Fulton County Comprehensive Plan (2016-2035), and the Cradle to Golden Years Plan (2016-2020).

## **Describe the jurisdiction's need for public improvements.**

During the community engagement process, public improvements were frequently mentioned not only as a stand-alone need but also as a crucial component to the development of additional affordable housing. The public improvement needs most commonly identified by local stakeholders include:

- Street, road, and sidewalk improvements
- Biking or walking trails
- Broadband internet access

Public improvement needs identified in the Fulton County Comprehensive Plan and other local plans include:

- Encourage development that promotes open space, walking paths and bicycle lanes as a means to connectivity and neighborhood cohesiveness.
- Implement the work program of the Fulton County CTP to development efforts as a means to address necessary road improvements.
- Plan and design multi-use trails and/or sidewalks during the development or renovation of any Fulton County facility.
- Partner with the Atlanta Regional Commission for plan implementation assistance and corridor enhancements.

Public infrastructure needs identified by Fulton County's cooperating cities via a survey about capital improvement projects include:

#### City of Alpharetta

- Road improvements (capacity, operational, bicycle, pedestrian), especially along east-west roadways.
- Complete street improvements for North Point Pkwy between Haynes Bridge and Mansell Roads. Street network proposed for the North Point area.
- Continued improvements to sidewalk network and pedestrian and bicycle amenities.
- Regional Stormwater park at North Point.
- Tunnel or bridge crossing at Haynes Bridge and Georgia 400 on ramp.
- Place making throughout the North Point and Downtown areas.
- Expand public art and historic preservation.

#### City of Chattahoochee Hills

- Roadway maintenance and paving, personnel and equipment for roads and right of way maintenance, and signage.
- Improvements to stormwater, bridge, and roadway infrastructure.

#### City of College Park

- Sidewalks along Lakeshore Drive between Herschel Road and Janice Drive to improve walkability to senior center at Camp Truitt.
- Routine shelter planning with Fulton County and people with disabilities to ensure accessibility requirements are met.
- Improvements to bike paths, sidewalks, streets, and water mains.
- Fire engines.

#### City of East Point

- Improved connectivity to recreation facilities, including sidewalks to every rec facility, additional paths and trails, and new sidewalks in high use areas.
- Maintenance and improvements for sidewalks, ramps, pedestrian signals, and crosswalks.
- Resurfacing and street maintenance.
- Water plant renovations, reservoir improvements, improvements to address degraded water, and sewer and storm water pipes throughout the city.

## City of Fairburn

- Pedestrian and roadway improvements, including sidewalks, other pedestrian-friendly trails, and bike routes linking neighborhood communities and major destinations.
- Installation of crosswalks at controlled intersections, mid-block crossings, and pedestrian bridges spanning SR14/US 29 and SR74.
- Rehabilitation/replacement of aging infrastructure, including extending the service life of water, sewer, stormwater, and transportation facilities.
- Upgrading of public infrastructure, including transportation, electric, water, sewer, sidewalks, lighting, streetscapes, public recreational space, and parking.
- Realignment and improvement of skewed intersections and dead-end roads.

## City of Hapeville

- New sidewalks and paving, handicap ramps, and bike paths and paving.

## City of Milton

- Sidewalk construction and maintenance, including ADA accessibility improvements.
- Streetscape improvements.
- Pavement management and gravel road maintenance.
- Intersection improvements at Birmingham-Crabapple and Freemanville-Providence.
- Trail connection to big creek greenway.
- Bridge replacement program.

## City of Mountain Park

- Sidewalks and dam improvements.

## City of Palmetto

- Routine street rehab, particularly in areas with failed culvert pipes.
- Water and wastewater conveyance.

## City of Union City

- Resurfacing improvements, specifically for high truck traffic corridors and additional sidewalk repairs or installation to provide a complete sidewalk network.
- Sidewalk improvements to provide a complete sidewalk network that includes ADA accessible ramps.
- Improvements to aging utility infrastructure, including water, sewer, and drainage structures.

## **How were these needs determined?**

The public improvements needs listed are based on input from multiple stakeholders consulted through interviews, focus groups, public meetings, and surveys targeted to residents and municipalities. These stakeholders included County and City staff and elected officials, Fulton County Housing Authority staff, nonprofit organizations, homeless housing and service providers, organizations serving people with disabilities, housing developers, civic organizations, and Fulton County residents.

Needs were also determined based on a review of previous local and regional plans, such as the Fulton County Strategic Plan (2016-2019), Fulton County Comprehensive Plan (2016-2035), and the Cradle to Golden Years Plan (2016-2020).

### **Describe the jurisdiction's need for public services.**

Public services, such as case management, childcare, transportation assistance, job training, and programming for youth and senior centers, are important of a community development strategy; however, CDBG funds that can be allocated to such activities are limited to a cap of 15% of a grantee's annual award. The public service needs most commonly identified by local stakeholders include:

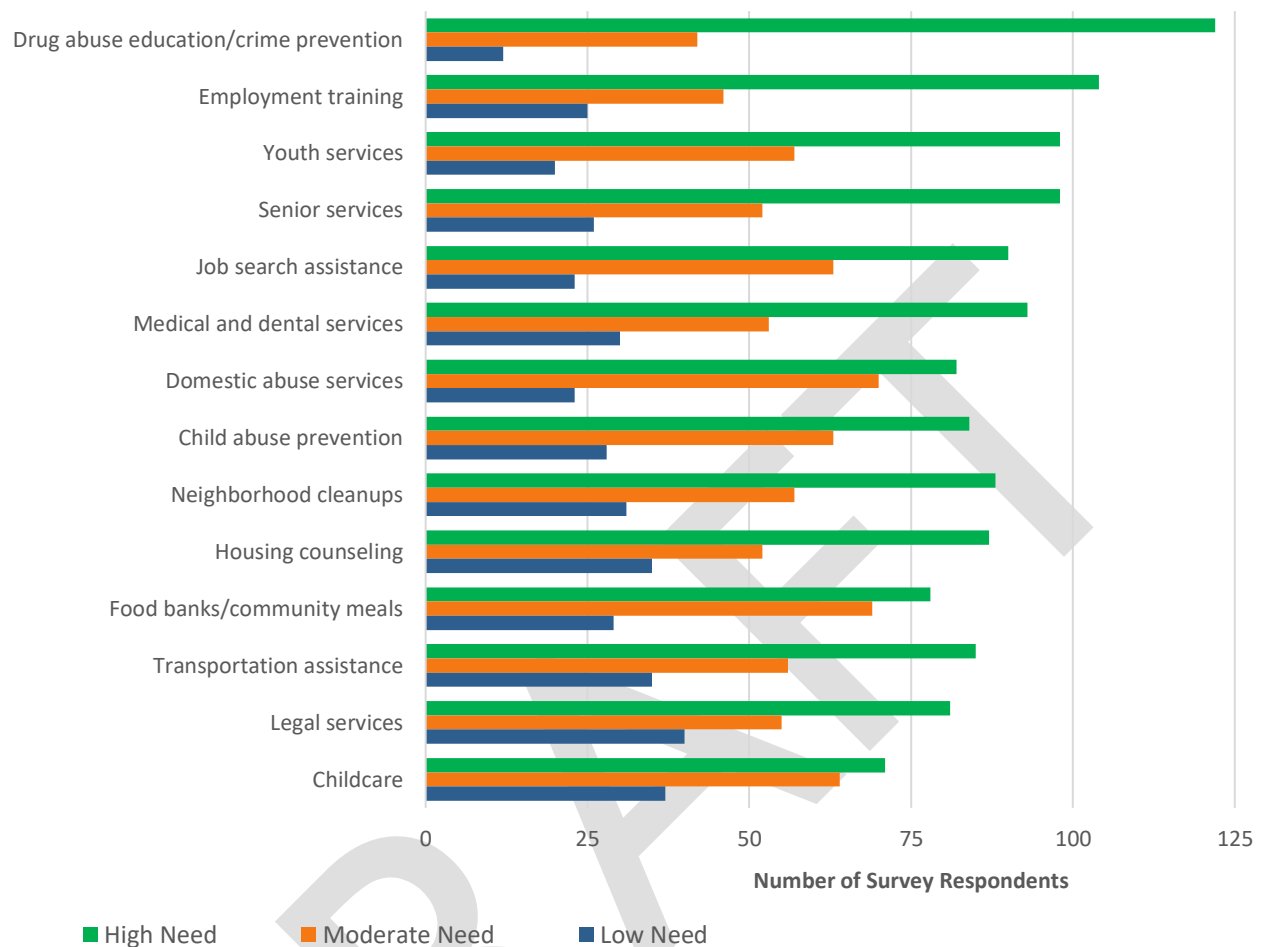
- Drug abuse education/ crime prevention
- Youth services, including after school and summer programs for youth up to age 18
- Employment training
- Senior services
- Job search assistance

Additional public service needs identified by stakeholders include:

- Medical and dental services
- Transportation assistance
- Childcare, including outside of traditional hours
- Mental health services
- Food access services
- Career development and vocational training
- Supportive services in housing for people transitioning from homelessness, youth transitioning from foster care, and people with disabilities
- Therapeutic recreation
- Non- traditional physical activities and youth sports
- Performance art programs
- Education on wellness through a virtual platform
- Healthy living programs for seniors including food preparation, physical fitness, and mental health
- Programs for persons with developmental disabilities to develop interpersonal and emotional skills
- Emergency assistance for homelessness prevention, including assistance with rent and utilities

The chart that follows shows the public service needs as ranked by survey respondents in the county.

FIGURE 2 – PUBLIC SERVICE NEEDS FROM THE 2019-2023 CONSOLIDATED PLAN CITIZEN INPUT SURVEY RESULTS



Public service needs identified in the Fulton County Strategic Plan and other local plans include:

- Mental health services and safety net.
- After school and summer programs for youth.
- Anti-truancy programs to redirect youth to education, employment, and services and supports, while also addressing family disfunction.
- Evidence-based health and wellness services that lower hospital readmissions and prevent premature institutionalization, including access to screenings and immunizations that result in better health outcomes.
- Publicly and privately funded emergency assistance programs that provide temporary financial relief
- Resources that assist individuals with financial management to improve economic status.
- Long-term services and supports for seniors that enable them to remain at home and age in place.
- Intergenerational programs and services to enhance social skills and academic outcomes for children and youth and decrease social isolation among the senior population.
- Developmental screenings for children and the necessary support to prepare them for kindergarten and beyond.

- Programs to reduce student mobility.
- Programs to address skills gaps and common hiring issues.
- Neighborhood crime prevention programs.
- Education for youth regarding gangs and criminal behavior.
- Instructional programs that improve public safety.
- Volunteer programs to extend the capacity of first responders.
- Environmental education.
- Supporting access to healthy food options for people living in food deserts.
- Facilitate the co-location of services.

Stakeholders interviewed as part of this planning process emphasized the need for affordable childcare, transportation assistance, and community meals. Interviewees also emphasized the need for greater coordination of services between the County and cities.

### **How were these needs determined?**

The public services needs listed above were generated based on input from multiple stakeholders consulted through interviews, focus groups, public meetings, and a survey. These stakeholders included County staff and elected officials, Fulton County Housing Authority staff, nonprofit organizations, homeless housing and service providers, organizations serving people with disabilities, housing developers, civic organizations, and Fulton County residents.

Needs were also determined based on a review of previous local and regional plans, such as the Fulton County Strategic Plan (2016-2019), Fulton County Comprehensive Plan (2016-2035), and the Cradle to Golden Years Plan (2016-2020).



# HOUSING MARKET ANALYSIS

---

## MA-05 OVERVIEW

### Housing Market Analysis Overview

While housing choices can be fundamentally limited by household income and purchasing power, the lack of affordable housing can be a significant hardship for low- and moderate-income households, preventing them from meeting other basic needs. Stakeholders and residents reported that affordable housing for families and individuals is a significant issue in Fulton County, and according to the 2011-2015 ACS, housing costs have increased substantially for renters over the last six years.

In addition to reviewing the current housing market conditions, this section analyzes the availability of assisted and public housing and facilities to serve homeless individuals and families. It also analyzes local economic conditions, and summarizes existing economic development resources and programs that may be used to address community and economic development needs identified in the Needs Assessment.

---

## MA-10 NUMBER OF HOUSING UNITS – 91.210(A)&(B)(2)

### Introduction

The 2011-2015 Five-Year American Community Survey estimates that there are 119,751 housing units in Fulton County, with an occupancy rate of about 86%, which is roughly equivalent to DeKalb County's occupancy rate of 87% and above Atlanta's occupancy rate of 81%. The largest share of units are single-family – 63% are single-family detached and 6% are attached single units (townhomes). Multifamily units comprise about one-third of Fulton County's housing. Most of these are in small multifamily properties with 5 to 19 units, which make up 19% of all units in Fulton County. Large complexes (20+ units per structure) account for 7% of Fulton County homes, while small buildings – duplexes, triplexes, and fourplexes – account for only 5%.

As Table 32 shows, about 58% of Fulton County households own their homes and 42% rent. This homeownership rate is somewhat lower than the statewide rate of 63% but above that of DeKalb County (55%) and city of Atlanta (44%). Nearly all owned housing in Fulton County has three or more bedrooms (91%). Unit size varies a bit more for renters – 22% have one bedroom, 40% have two bedrooms, and 35% have three or more bedrooms.

## Residential Properties by Number of Units

**TABLE 31 – RESIDENTIAL PROPERTIES BY UNIT NUMBER**

Property Type	Number	Percent
1-unit detached structure	74,894	63%
1-unit, attached structure	7,394	6%
2-4 units	6,125	5%
5-19 units	22,825	19%
20 or more units	7,940	7%
Mobile Home, boat, RV, van, etc.	573	0%
<b>Total</b>	<b>119,751</b>	<b>100%</b>

Data Source: 2011-2015 ACS

## Unit Size by Tenure

**TABLE 32 – UNIT SIZE BY TENURE**

Unit Size	Owners		Renters	
	Number	Percent	Number	Percent
No bedroom	38	0%	1,315	3%
1 bedroom	394	1%	9,505	22%
2 bedrooms	5,229	9%	17,245	40%
3 or more bedrooms	54,213	91%	15,185	35%
<b>Total</b>	<b>59,874</b>	<b>101%</b>	<b>43,250</b>	<b>100%</b>

Data Source: 2011-2015 ACS

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

Fulton County residents are served through a variety of assisted housing programs – including public housing, housing choice vouchers, project-based Section 8 units, Section 202 units, Low Income Housing Tax Credit (LIHTC) properties, and Fulton County’s home repair programs and homeownership assistance programs. Number of units and income and family type targeting are summarized below:

- Public housing – HUD reports about 680 public housing units in Fulton County, including seven apartment communities and about 60 scattered site units, targeted to residents with incomes at or

below 50% AMI. Three communities with a total of 56 public housing units – Legacy at Walton Lakes, Woodbridge at Parkway Village, and Providence at Parkway Village – are targeted to seniors.

- Housing choice vouchers – HUD estimates that there are 3,695 tenant-based HVCs in use in Fulton County, targeted toward senior and family renters with incomes at or below 50% AMI. Eighteen (18) Veterans Affairs Supportive Housing vouchers are also in use. In addition to HUD vouchers, Fulton County provides tenant-based rental assistance (TBRA) using HOME grant funds. Under the last Consolidated Plan, the County provided TBRA to about 100 households.
- Project-based Section 8 – There are six properties with 533 units targeted to households with incomes at or below 50% AMI with project-based Section 8 rental assistance in Fulton County. Most of these units (371) are targeted to seniors and the remaining units (162) are family properties.
- Other multifamily housing – Fulton County has three properties with about 122 units with Section 202 (Supportive Housing for the Elderly). These are targeted to seniors with incomes at or below 50% AMI.
- Low Income Housing Tax Credits (LIHTC) – According to HUD’s Affirmatively Furthering Fair Housing data and LIHTC database, there are about 28 LIHTC properties in Fulton County with about 4,000 units targeted to residents with incomes at or below 50% or 60% AMI. About 3,300 units were in family properties and 700 in senior properties.
- Fulton County Home Repair Services – The County offers home repair assistance through a Homeowner Rehabilitation Program funded with CDBG funds and a Minor Home Repair Program run by the Department of Senior Services. About 28 homeowners with incomes at or below 80% AMI participated in the Homeowner Rehabilitation Program under the last Consolidated Plan.
- Fulton County Home Owner Program – The County assists eligible households with incomes at or below 80% AMI with down payment and closing cost assistance of up to 6% of the home’s sale price up to \$10,000. The County assisted about 85 households under the last Consolidated Plan.

**Provide an assessment of units expected to be lost from the affordable housing inventory for any reason, such as expiration of Section 8 contracts.**

Federal law requires any LIHTC properties awarded credits after 1989 to maintain affordability for 30 years, although after the first 15 years, owners can leave the program through a relief process. After 30 years (or 15 years if owner are granted regulatory relief), properties can be converted to market-rate units. During the 2020-2024 Five-Year Consolidated Plan, six LIHTC properties in Fulton County will age out of the 30-year affordability period. These are all family properties and together have about 800 units of income-restricted units.

Another 16 LIHTC developments with about 2,800 income-restricted units – including a mix of family and senior properties – will enter or be in their 15-year extended use period, during which they may potentially be eligible to request regulatory relief to convert to market-rate.

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

While Fulton County supports affordable housing using a variety of federal, state, and local resources, the Needs Assessment shows that housing needs outpace available assistance. There are an estimated 7,398 renter households with incomes under 30% AMI who spend more than one-half of their income on housing, and an additional 2,492 households with incomes between 30 and 50% AMI who do so. Low- and moderate-income homeowners also face affordability challenges: 4,614 owners with incomes under 50% AMI spend more than one-half of their income on housing costs. Community input also shows a strong need for additional affordable housing.

The Joint Analysis of Impediments to Fair Housing Choice for the City of Atlanta and Fulton County completed in conjunction with this Consolidated Plan shows that most affordable housing developments (LIHTC, public housing, project-based Section 8 housing, and other assisted multifamily developments) are in south Fulton County. Housing choice vouchers are also more likely to be used in south Fulton County.

### Describe the need for specific types of housing.

Fulton County's most acute housing need is for affordable rental housing units, particularly for households with incomes at or below 50% of the area median income and people who are homeless. Stakeholders who participated in development of the Consolidated Plan also emphasized the need for:

- Housing rehabilitation and repair
- Reuse or redevelopment of vacant houses
- Housing that accepts Housing Choice Vouchers
- First time homeowner assistance
- Bridge and transitional housing
- Housing for homeless youth
- Emergency housing shelters in south Fulton County
- Affordable housing for seniors
- Permanent supportive housing, including for people with behavioral health needs
- Housing for people with HIV/AIDS

When asked to identify the county's greatest housing needs, survey participants selected senior housing, energy efficiency improvements, housing for people with disabilities, rental and owned housing improvements, down payment assistance, and construction of new affordable rental units as most important. Survey participants also ranked homeless resources as a high need in Fulton County, including homelessness prevention, transitional/supportive housing programs, and permanent housing.

MA-15 HOUSING MARKET ANALYSIS: COST OF HOUSING – 91.210(A)

Introduction

This section reviews housing costs and affordability in Fulton County. As Table 33 shows, median home value in Fulton County is estimated at \$241,300 according to 2011-2015 ACS data. This value represents a small decline (4%) from the 2005-2009 median of \$250,800 but is a likely result of the Great Recession and subsequent recovery occurring during this time period. It is well above the state median home value of \$151,300.

Median contract rent is about \$821 according to the 2011-2015 ACS, up 9% from \$756 in 2005-2009. Nearly two-thirds of Fulton County’s rental units (62%) rent for between \$500 and \$999. One-fifth of units have rental rates from \$1,000 to \$1,499 (see Table 34).

American Community Survey data shows considerable variation in housing costs across Fulton County, with much higher housing costs in the northern part than in the south. Median contract rent in north Fulton County cities ranges from \$1,028 in Mountain Park to \$1,157 in Johns Creek. In comparison, south Fulton County cities have median contract rents from \$594 in College Park to \$788 in Chattahoochee Hills. Median home values show a similar pattern. In the north, they range from \$209,000 in Mountain Park to \$459,500 in Milton. In the south, they range from \$85,900 in Palmetto to \$171,400 in Chattahoochee Hills.

Cost of Housing

TABLE 33 – COST OF HOUSING

Cost of Housing	Base Year: 2009	Most Recent Year: 2015	% Change
Median Home Value	\$250,800	\$241,300	(4%)
Median Contract Rent	\$756	\$821	9%

Data Source: 2005-2009 ACS (Base Year), 2011-2015 ACS (Most Recent Year)

TABLE 34 – RENT PAID

Rent Paid	Number	Percent
Less than \$500	5,908	14%
\$500-999	26,615	62%
\$1,000-1,499	8,784	20%
\$1,500-1,999	1,348	3%
\$2,000 or more	590	1%
Total	43,245	100%

Data Source: 2011-2015 ACS

## Housing Affordability

**TABLE 35 – HOUSING AFFORDABILITY**

Units Affordable to Households Earning	Renter	Owner
30% HAMFI	2,700	No Data
50% HAMFI	10,343	5,054
80% HAMFI	27,511	13,644
100% HAMFI	No Data	19,563
<b>Total</b>	<b>40,554</b>	<b>38,261</b>

Data Source: 2011-2015 CHAS

## Monthly Rent

**TABLE 36 –HOME AND FAIR MARKET RENTS FOR FULTON COUNTY**

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	\$942	\$966	\$1,106	\$1,427	\$1,752
High HOME Rent	\$888	\$952	\$1,106	\$1,313	\$1,445
Low HOME Rent	\$697	\$747	\$897	\$1,036	\$1,156

Data Source: HUD FMR and HOME Rents

## Is there sufficient housing for households at all income levels?

Housing cost data and public input shows that there is not sufficient housing for households at all income levels and that affordability is the biggest challenge facing low- and moderate-income households in Fulton County. Overall, about 33% of Fulton County households have one or more housing problems and 70% of low- and moderate-income households have a cost burden.

Table 35 estimates the number of units in Fulton County affordable to renters and owners at a variety of income levels, which can be compared to the number of households at each income level, as provided in Table 8 of the Needs Assessment.

According to CHAS estimates, there are 10,644 renters with incomes under 30% HAMFI, but only 2,700 rental units affordable at that income level reported in Table 35. Thus, there is insufficient rental housing for households with very low incomes. At other income levels, there appears to be enough affordable renter units. However, these figures do not take into account unit condition or size, nor do they reflect the possibility that a unit that would be affordable to a low- or moderate-income household may be unavailable to them because it is occupied by a higher income household.

Turning to owners, there are an estimated 8,498 owner households with incomes at or below 50% HAMFI in Fulton County, but Table 35 reports only 5,054 owner households affordable at that income level, suggesting a deficit of affordable owner-occupied units. At the next income level, there appear to be adequate affordable units. As with rental housing, these figures do not take into account housing size or condition, or the possibility that higher income households will choose to occupy lower cost units.

The National Low Income Housing Coalition's *Out of Reach* data examines rental housing rates relative to income levels for counties and metro areas throughout the U.S using HUD Fair Market Rents (FMR). Fair Market Rent (FMR) is a standard set by HUD at the county or regional level for use in administering its Section 8 rental voucher program. FMRs are typically the 40<sup>th</sup> percentile gross rent (i.e., rent plus utility costs) for typical, non-substandard rental units in the local housing market. To afford a two-bedroom rental unit at Fulton County's 2019 FMR of \$1,106 without being cost burdened would require an annual wage of \$44,240. This amount translates to a 40-hour work week at an hourly wage of \$21.27, a 117-hour work week at minimum wage, or a 35-hour work week at the county's average renter wage of \$24.66. To afford a three-bedroom unit at the FMR of \$1,427 would require an annual wage of \$57,080.

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

Table 33 shows that median home value decreased by 4% from the 2005-2009 ACS to the 2011-2015 ACS, and median rent increased by 9%. While home values may have fallen within that period, which stretched from before to after the Great Recession, affordability is now decreasing. More recent 2013-2017 ACS data indicates a median home value of \$268,900, surpassing the median of the mid- to late-2000s.

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

Table 36 above shows HUD Fair Market Rents and HOME rents for Fulton County. The median contract rent of \$821 is below the FMR and high HOME rents for all unit sizes. About 76% of units in Fulton County rented for under \$1,000 as of the 2011-2015 ACS data, which falls under the FMR and HOME rents for two-, three-, and four-bedroom units. These figures suggest that housing choice voucher holders would be able to access a variety of units, given the share of housing renting for less than FMRs. However, median rents by jurisdiction show that voucher holders' ability to access housing would vary across the county. Stakeholder input indicates that landlords' refusal to accept vouchers, poor credit histories, past evictions, criminal histories, and rising housing costs can also be barriers.

Additionally, this data does not reflect housing conditions, which is an important consideration for renters. While rent may be affordable, substandard housing conditions may make a unit unsafe or lead to exceptionally high utility costs, negating savings in rent as compared to a more expensive but energy efficient unit.

---

## MA-20 HOUSING MARKET ANALYSIS: CONDITION OF HOUSING – 91.210(A)

### Introduction

This section examines the condition of housing in Fulton County, including the presence of selected housing conditions: (1) lack of complete plumbing facilities, (2) lack of complete kitchen facilities, (3) more than one person per room, and (4) cost burden greater than 30%. This section also examines the age of housing stock, vacancy rate and suitability of vacant housing for rehabilitation, and the risk of lead-based paint hazards.

According to the 2011-2015 ACS estimates, about 48% of rental housing and 28% of owner housing have one of the selected housing conditions. CHAS data discussed in the Needs Assessment indicates that cost burdens are by far the most common housing condition. Only 1% of owner units have two selected conditions (330 units), and none have three or more conditions. For renters, 3% of units have two or more conditions (1,454 units). These figures indicate that rental units are more likely to be physically substandard (i.e., lacking a complete kitchen or plumbing).

Age of housing in Fulton County reflects continued suburban development over the last several decades. For rental housing, roughly one-third of units were built between 1950 to 1979, one-third were built from 1980 to 1999, and a final third were built since 2000. Owner housing is slightly newer: 21% of units were built between 1950 and 1979, 34% were built between 1980 and 1999, and the largest share (40%) were built since 2000. For both owners and renters, few housing units were constructed prior to 1950 (5,416 units or 5%).

### Describe the jurisdiction's definition for "substandard condition" and "standard condition but suitable for rehabilitation."

For the purpose of this Consolidated Plan, Fulton County defines a property to be in "substandard condition" when one or more property conditions exist that do not conform to local building code or housing code.

A property is considered to be "substandard but suitable for rehabilitation" when one or more property conditions exist that do not conform to local building or housing code but economic and environmental factors render the property suitable for rehabilitation.



## Condition of Units

**TABLE 37 - CONDITION OF UNITS**

Condition	Owners		Renters	
	Number	Percent	Number	Percent
With one selected condition	16,730	28%	19,475	45%
With two selected conditions	330	1%	1,424	3%
With three selected conditions	0	0%	30	0%
With four selected conditions	0	0%	0	0%
No selected conditions	42,824	72%	22,345	52%
<b>Total</b>	<b>59,884</b>	<b>101%</b>	<b>43,274</b>	<b>100%</b>

Data Source: 2011-2015 CHAS

## Year Unit Built

**TABLE 38 – YEAR UNIT BUILT**

Year Unit Built	Owners		Renters	
	Number	Percent	Number	Percent
2000 or later	23,833	40%	13,940	32%
1980-1999	20,569	34%	13,853	32%
1950-1979	12,430	21%	13,122	30%
Before 1950	3,038	5%	2,378	6%
<b>Total</b>	<b>59,870</b>	<b>100%</b>	<b>43,293</b>	<b>100%</b>

Data Source: 2011-2015 CHAS

## Risk of Lead-Based Paint Hazard

**TABLE 39 – RISK OF LEAD-BASED PAINT**

Risk of Lead-Based Paint Hazard	Owners		Renters	
	Number	Percent	Number	Percent
Total units built before 1980	15,468	26%	15,500	36%
Housing units built before 1980 with children present	14,017	23%	7,860	18%

Data Source: 2011-2015 CHAS (Total Units), 2011-2015 CHAS (Units with Children Present)

## Vacant Units

**TABLE 40 - VACANT UNITS**

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

Data Source:

### Describe the need for owner and rental rehabilitation based on the condition of the jurisdictions' housing.

Data regarding housing conditions indicates that 1,454 rental units in Fulton County have at least two housing conditions, which are likely to include cost burdens and one other condition (overcrowding, lack of complete kitchen, or lack of complete plumbing). CHAS data from the Needs Assessment indicates that there are 395 renter household with incomes below the area median who lack complete kitchens or plumbing. Additionally, a substantial portion of rental housing (36%) was built before 1980, and as this housing ages, maintenance needs will continue to grow.

Community input indicated both single-family and multi-family rehabilitation as fairly high priorities. Data indicates that owners are less likely to lack complete kitchens and plumbing, and therefore are less likely to live in substandard housing. However, housing age suggests that some owner-occupied units are at risk of deferred maintenance and may currently or in the near future be in need of some rehabilitation, given that 26% of units were built prior to 1980. Additionally, seniors living on Social Security or retirement income may have paid off their mortgages but are now unable to afford necessary repairs and maintenance as their homes age. To address these needs, Fulton County offers a minor home repair program for seniors and a CDBG-funded homeowner rehabilitation program.

### Estimate the number of housing units within the jurisdiction that are occupied by low or moderate income families that contain lead-based paint hazards.

Exposure to lead-based paint represents one of the most significant environmental threats from a housing perspective. Housing conditions can significantly affect public health, and exposure to lead may cause a range of health problems for adults and children. The major source of lead exposure comes from lead-contaminated dust found in deteriorating buildings, including residential properties built before 1978 that contain lead-based paint.

Unfortunately, identifying the number of housing units with lead-based paint hazards is difficult. Risk factors for exposure to lead include housing old enough to have been initially painted with lead-based paint (i.e., pre-1978), households with young children, and households in poverty. Table 38 identifies the

total number of renter and owner housing units built before 1980 with children present. As shown, there are an estimated 7,860 renter-occupied and 14,017 owner-occupied units with at least two risk factors for exposure to lead-based paint.

---

## MA-25 PUBLIC AND ASSISTED HOUSING – 91.210(B)

### Introduction

Publicly-supported housing in Fulton County is managed by the Housing Authority of Fulton County (HAFC). This quasi-governmental authority is governed by a nine-member board of commissioners appointed by the Fulton County Board of Commissioners. Several additional housing authorities exist in municipalities within Fulton County's entitlement area, including the Housing Authorities of College Park, East Point, Union City, Fairburn, and Palmetto. The Housing Authorities of Union City, Fairburn and Palmetto are considered Qualified PHAs, and are therefore exempt from submitting annual plans.

The needs of public housing residents and voucher holders are different from those of the county's overall low- and moderate-income population primarily in that these residents are housed in stable and decent housing. With this need met, residents can work on other needs that families typically face in addition to housing insecurity. These other needs frequently include childcare, healthcare, employment, transportation, and food.

## Totals Number of Units

**TABLE 41 – TOTAL NUMBER OF UNITS BY PROGRAM TYPE**

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project -based	Tenant -based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled*
# of units vouchers available	1	0	1,038	1,639	0	455	68	0	0
# of accessible units			0						

**\*Note:** Includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-Year, and Nursing Home Transition

**Data Source:** PIC (PIH Information Center)

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

### *The Housing Authority of Fulton County*

The Housing Authority of Fulton County (HAFC) no longer owns or operates any public housing, having converted its public housing through the RAD program to project-based vouchers. As of 2019, the HAFC operates 2,272 total units, of which 947 utilize housing choice vouchers, 132 are LIHTC units, 190 are project-based vouchers/RAD and 1,003 are port vouchers.<sup>16</sup>

<sup>16</sup> Housing Authority of Fulton County. "FY 2019 Annual Plan." <https://www.hafc.org/FY2019%20Annual%20Plan.pdf>. p. 1.

*The Housing Authority of the City of East Point*

The Housing Authority of the City of East Point (EPHA) currently has 280 units of traditional public housing, as well as 555 housing choice voucher units. The EPHA has two public housing sites. The Martel Apartments are a 150-unit site built in 1963. The Martel Apartments underwent modernization in 2012. The OJ Hurd Apartments contain 35 units which were built in 1971. The Hurd Apartments completed modernization in 2010.<sup>17</sup>

**Public Housing Condition****TABLE 42 - PUBLIC HOUSING CONDITION**

Public Housing Development	Average Inspection Score
Housing Authority of Fulton County, Providence at Parkway Village, 5095 Southwood Rd	98
Housing Authority of Fulton County, Allen Road Midrise, 151 W Belle Isle Rd	47
Housing Authority of Fulton County, Woodbridge at Parkway Village, 5151 Thompson Rd	98
Housing Authority of Fulton County, Legacy at Walton Lakes, 4725 Walton Xing SW	89
Housing Authority of Fulton County, Arcadia at Parkway Village, 5150 Thompson Rd	85
Housing Authority of the City of East Point, OJ Hurd, 1344 Holcomb Ave	92
Housing Authority of the City of East Point, Martel Homes, 1022 Calhoun Ave	70
Housing Authority of the City of Palmetto, Palmetto Housing Authority, 201 Beckman St	67
Housing Authority of the City of Union City, Union City Housing Authority, 4859 Jonesboro Rd	82
Housing Authority of the City of College Park, College View Hills, 1984 Princeton Ave	43

**Data Source:** HUD Physical Inspection Scores

**Describe the restoration and revitalization needs of public housing units in the jurisdiction.**

The HAFC has converted its public housing units to other housing types, such as Housing Choice Vouchers, Low-Income Housing Tax Credit developments and Project-Based voucher/RAD units. The HAFC dispossessed its last nine public housing units at 151 W Belle Isle Road and will remediate the loss of these units through the reservation of new units at the “Anthem at Riverside” site, a new LIHTC development in south Fulton County.

In its 2019 Annual Plan, the EPHA identified that its public housing stock is in “fairly good condition,” but is aging. The authority plans to address the physical condition of its most distressed public housing units mainly through RAD conversion and other mixed financing tools.<sup>18</sup>

<sup>17</sup> Housing Authority of the City of East Point. “Properties and Amenities.” Accessed December 12, 2019.

<https://www.eastpointha.org/public-housing-program/properties-and-amenities/>

<sup>18</sup> Housing Authority of the City of East Point. “Annual Plan for Fiscal Year 2019/5-Year Action Plan for Years 2019-2023.”

<https://www.eastpointha.org/agency-plans/>, p. 6.

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

The HAFC has converted its former public housing units to other forms of publicly-supported housing. In July 2018, the EPHA implemented the HUD Smoke-free policy at all of its public housing locations. The Smoke-Free policy serves to improve the health of residents and staff and keep the housing units in better physical condition.

---

**MA-30 HOMELESS FACILITIES AND SERVICES – 91.210(C)**

**Introduction**

This section highlights organizations providing for the needs of homeless or potentially homeless persons in Fulton County and summarizes the facilities available there. There are approximately 1,422 total beds offered for people who are homeless by multiple agencies in Fulton County. This includes, emergency shelter, transitional rapid re-housing and permanent supportive housing beds. Supportive services for homeless persons include

The table below summarizes the number of beds and units that are available for people experiencing homelessness within Fulton County.

## Facilities and Housing Targeted to Homeless Households

**TABLE 43 - FACILITIES AND HOUSING TARGETED TO HOMELESS HOUSEHOLDS**

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds	Current & New	Current & New	Under Development
Households with adult(s) and child(ren)	159	0	79	187	360
Households with only adults	308	0	14	95	137
Chronically homeless households					
Veterans	0		20	59	0
Unaccompanied youth	4	0	4	0	4

**Data Source:** Mosaic Community Planning research of Fulton County homeless housing providers

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

There are limited health and mental health services targeted specifically to homeless persons in the entitlement areas of Fulton County. Community Advanced Practice Nurses, Inc. operates 8 clinics, largely in shelters serving women, children and families around the metropolitan Atlanta region. In Fulton County, two of the shelters served include the Mary Hall Freedom House and Nicholas House. Clinics operated by Community Advanced Practice Nurses, Inc. provide a range of health services to homeless and low-income individuals, including physical exams, women's health services, STI & HIV testing, and mental health counseling. Services are provided at no cost and allow for walk-in appointments. These services provide an alternative to emergency room care for homeless families. Fulton County also offers health services on a sliding scale at two county health centers: The College Park (Willie J. Freeman) Regional Health Center and The North Fulton Regional Health Center. Services at both locations focus on women's health and children's dental health services.

Employment services are offered through several different organizations including the Atlanta Fulton Public Library System, which offers free classes in Word, Excel and Powerpoint and in computer programming/coding. Local non-profits such as Caring Works, Inc., North Fulton Community Charities and the Mary Hall Freedom House also provide services such as vocational and GED programs, computer literacy, and work readiness classes.

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

**Gilgal, Inc.**

Located in the City of Atlanta, Gilgal, Inc. operates a transitional housing facility for homeless women suffering from drug and alcohol addiction. The services provided include case management, counseling, health services during their tenure in transitional housing. The organization also provides supportive services following graduation from the program.

**Nicholas House, Inc.**

Nicholas House, Inc. provides emergency shelter for homeless families at its Boulevard location. The organization offers permanent supportive housing for chronically homeless families. Nicholas House also offers rapid-rehousing and homeless prevention services in the form of both subsidized housing and financial assistance, such as rent deposits, first month's rent, apartment application fees, and moving costs.

**Caring Works, Inc.**

Caring Works offers emergency shelter for men through its 70-bed Hope House facility. Hope House also provides services for the deaf and hard of hearing. Caring Works offers short-term and long-term supportive housing for adults, women with children, and adults over 18 with disabilities. Caring Works



also provides supportive services to its clients, including childcare, employment assistance, legal assistance and mental health services.

### **Drake House**

The Drake House provides 90- to 180-day emergency shelter to homeless women and children in north Fulton County. The Drake House operates also operates the Drake Closet, the Drake Village Apartments for single mothers with children, and the Drake Activity Center which provides afterschool care.

### **Family Promise of North Fulton/Dekalb**

Family Promise of North Fulton/Dekalb is a collective of host churches and synagogues that provide emergency shelter for homeless families. Families rotate weekly amongst the member churches and synagogues in the organization. Family Promise also offers meals and case management services.

### **Georgia Center for Youth Excellence**

Georgia Center for Youth Excellence operates a transitional housing facility for homeless male youth age 16-22 and permanent supportive housing for youth age 18-24. The services provided include case management, counseling, health services during their tenure in transitional housing and while they are in permanent supportive housing.

### **HomeStretch**

This organization provides 23 supportive housing units to families in north Metro Atlanta. Participants in the program must have a householder who is employed fulltime and the family must be homeless or eminently homeless.

### **Traveler's Aid of Metropolitan Atlanta, Inc./HOPE Atlanta**

HOPE Atlanta provides permanent supportive and transitional housing with case management to variety of groups, including domestic violence victims, individuals living with HIV/AIDS, chronically homeless, veterans, grandparents raising grandchildren, and persons with disabilities. HOPE Atlanta also provides street outreach for chronically homeless individuals. The organization offers a Veteran's Workforce Development Program to assist veterans with employment services including job training and transportation assistance.

### **Mary Hall Freedom House, Inc.**

The Mary Hall Freedom House provides a range of services to homeless women and children, including daycare, after-school programming, parenting classes, and counseling for children; day treatment programs and other mental health services; a 24-hour assessment center for emergency housing services, transitional housing, permanent housing and housing for veterans.

### **North Fulton Community Charities**

The North Fulton Community Charities provides supportive services to families, including rental and utility assistance. The organization also provides a range of social services, such as food assistance, clothing assistance, and connection to educational, employment and government resources.

**Partnership Against Domestic Violence**

The Partnership Against Domestic Violence offers services for adults experiencing domestic violence, to include a 24-hour crisis line, 96 emergency shelter beds at two locations, supportive housing, legal advocacy and educational services.

**Zion Hill Community Development Corporation**

The Zion Hill CDC offers rent and utility assistance in eight South Fulton county cities. The Zion Hill CDC also provides permanent supportive housing to disabled women over 55 and disabled young adults aged 18-24. The organization provides transitional housing, a clothing closet, educational workshops and serves as a United Way 211 resource satellite center.

---

## **MA-35 SPECIAL NEEDS FACILITIES AND SERVICES – 91.210(D)**

**Introduction**

This section describes the housing and social service needs of Fulton County's special populations, including the elderly, frail elderly, domestic violence victims, residents with a diagnosis of HIV/AIDS, and residents with substance abuse addiction, mental health diagnosis or a disability.

**Including the elderly, frail elderly, persons with disabilities (mental, physical, developmental), persons with alcohol or other drug addictions, persons with HIV/AIDS and their families, public housing residents and any other categories the jurisdiction may specify, describe their supportive housing needs.**

Housing and supportive needs of these subpopulations (the elderly, frail elderly, persons with disabilities, persons with HIV/AIDS and their families, persons with alcohol or drug addiction, victims of domestic violence, and persons with a criminal record and their families) were determined by input from both service providers and the public through the survey, public meetings and stakeholder interviews.

According to 2013-2017 ACS data, approximately 11% of Fulton County residents are aged 65 years and over. Elderly individuals aged 70-74 are projected to be the largest growing age group in the county between the years 2016-2021.<sup>19</sup> The largest areas of growth for the elderly, outside of Atlanta, are in north Fulton. Stakeholders note that the greatest supportive housing needs for seniors are those services that allow them to live independently at home. Despite being stably housed, seniors may not be able to perform maintenance or pay for maintenance on their homes, which could be offered through supportive services for independent living. Seniors also need services that protect their assets, such as wills and estate planning, or educate them on popular scams in the real estate market.

Seniors and persons with disabilities both find their mobility services limited based on where they live. MARTA Mobility, the paratransit service serving Fulton County, requires that riders live within one mile of a bus line. This restriction can prove difficult for seniors and persons with disabilities living in suburban

---

<sup>19</sup> "Annual Report 2017." Fulton County Government Department of Senior Services.  
[http://www.fultoncountyga.gov/images/stories/Aging\\_Youth/2018/2017\\_Annual\\_Report\\_-\\_Department\\_of\\_Senior\\_Services.pdf](http://www.fultoncountyga.gov/images/stories/Aging_Youth/2018/2017_Annual_Report_-_Department_of_Senior_Services.pdf)

and rural areas of Chattahoochee Hills, South Fulton, Fairburn and Palmetto, and particularly in car-centric areas of Alpharetta, Johns Creek, Roswell and Mountain Park. Furthermore, service providers note that it is difficult to find supportive housing for individuals with behavior health needs and developmental disabilities.

Stakeholders note that persons living with HIV/AIDS have an increased need for permanent supportive housing in the region. Supportive housing services are optional in housing first model, making it difficult to serve clients who opt not to participate in services. Persons living with HIV/AIDS also have a special need for access to private and cool medication storage. Due to the stigma around HIV/AIDS, those without consistent access to medication store may fail to take the medications regularly, or may store medications in private but unrefrigerated locations, reducing the effectiveness of the medications and increasing the likelihood of a worsening disease.

According to the website for the Partnership Against Domestic Violence, a metropolitan Atlanta-serving non-profit, the organization provides several supportive housing services for victims of domestic violence. These services include “rent and additional financial assistance, community resources, emotional support and ongoing skill development.”<sup>20</sup> Supportive services such as these assist victims of domestic violence with maintaining stable housing and improving the overall well-being of victims and their children.

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

Throughout the state of Georgia, persons discharged from mental and physical health facilities may be released to homeless shelters and extended stay motels but typically are not assigned case management services.<sup>21</sup>

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

In 2019, Fulton County used CDBG and HOME funds to support youth services, homeless services, home rehab programs, down payment assistance to homebuyers, and tenant-based rental assistance, among other programs. Although the County did target activities specifically to non-homeless special needs populations, these activities are expected to provide a community-wide benefit, which will support some of the unique needs of people within these subpopulations.

---

<sup>20</sup> Partnership Against Domestic Violence, “Helping Hearts with Housing.” Accessed December 6, 2019. <https://padv.org/helpingheartswithhousing>

<sup>21</sup> “Georgia’s efforts to fix mental health system fall short, monitor says.” Accessed October 24, 2019. <https://www.ajc.com/news/state--regional-govt--politics/georgia-efforts-fix-mental-health-system-fall-short-monitor-says/7wWMNdgm1ZfXp15Yk23cUO/>

---

## MA-40 BARRIERS TO AFFORDABLE HOUSING – 91.210(E)

**Describe any negative effects of public policies on affordable housing and residential investment.**

Through the Fulton County Homeownership Program, the county provides funding for down payment assistance of up to 6% of the purchase price, or \$10,000 maximum. Stakeholders noted, however, that the amount of down payment assistance provides more assistance in the southern part of Fulton County – where home prices are generally lower – than it provides to homebuyers in north Fulton where home prices are higher, or where higher incomes may not meet the program’s criteria.

The Homeownership Program allows down payment assistance to go toward existing home priced no higher than \$201,000. New homes cannot be priced above \$244,000. The program serves several cities, including Alpharetta, Chattahoochee Hills, College Park, East Point, Fairburn, Hapeville, Milton, Mountain Park, Palmetto and Union City. However, HUD Market Data on the Fulton/Dekalb County housing market area (HMA) states that around one-third of new homes built since 2013 have been built in north Fulton County. North Fulton is also projected to have home prices exceeding \$579,999 for large, single-family units. South Fulton County accounts for 21% of all new homes built since 2013, however, projected demand is \$180,000-\$279,999 for smaller single-family units and townhomes. Across the board, home prices in the region are projected to have the greatest demand in the \$280,000 to \$379,999 range, with the second greatest demand in the \$380,000 to \$479,999 range.<sup>22</sup> Those seeking to utilize the County’s Homeownership Program are most likely to assist residents in the southern part of the County where home prices are projected to be lower than north Fulton.

---

## MA-45 NON-HOUSING COMMUNITY DEVELOPMENT ASSETS – 91.215 (F)

### Introduction

This section outlines the employment, labor force, and educational attainment data which informed the development of priorities and goals in this Plan.

---

<sup>22</sup> Ibid. p. 11

## Business Activity

TABLE 44 - BUSINESS ACTIVITY

Business by Sector	Number of Workers	Number of Jobs	Share of Workers	Share of Jobs	Jobs less Workers
Agriculture, Mining, Oil & Gas Extraction	129	109	0	0	0
Arts, Entertainment, Accommodations	13,950	21,657	13	11	-2
Construction	3,133	3,864	3	2	-1
Education and Health Care Services	15,506	13,552	14	7	-7
Finance, Insurance, and Real Estate	8,559	18,968	8	9	2
Information	5,338	15,745	5	8	3
Manufacturing	5,104	9,577	5	5	0
Other Services	3,054	4,950	3	2	0
Professional, Scientific, Management Services	13,756	26,872	13	13	1
Public Administration	0	0	0	0	0
Retail Trade	12,247	17,309	11	9	-3
Transportation, Warehousing, Utilities	8,629	24,260	8	12	4
Wholesale Trade	7,160	18,938	7	9	3
<b>Total</b>	<b>96,565</b>	<b>175,801</b>	<b>--</b>	<b>--</b>	<b>--</b>

Data Source: 2011-2015 ACS (Workers), 2015 Longitudinal Employer-Household Dynamics (Jobs)

## Labor Force

**TABLE 45 - LABOR FORCE**

Total population in the civilian labor force	146,258
Civilian employed population 16 years and over	130,734
Unemployment rate	10.6%
Unemployment rate for ages 16-24	22.8%
Unemployment rate for ages 25-65	7.2%

Data Source: 2011-2015 ACS

**TABLE 46 – OCCUPATIONS BY SECTOR**

Occupations by Sector	Number
Management, business, and financial	38,815
Farming, fisheries, and forestry	6,444
Service	10,509
Sales and office	34,525
Construction, extraction, maintenance, and repair	6,803
Production, transportation, and material moving	6,657

Data Source: 2011-2015 ACS

## Travel Time

**TABLE 47 – TRAVEL TIME**

Travel Time	Number	Percentage
< 30 Minutes	63,715	54%
30-59 Minutes	40,005	34%
60 or More Minutes	14,903	13%
<b>Total</b>	<b>118,623</b>	<b>100%</b>

Data Source: 2011-2015 ACS

## Education

TABLE 48 - EDUCATIONAL ATTAINMENT BY EMPLOYMENT STATUS (POPULATION AGE 25 TO 64)

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	6,505	1,443	5,085
High school graduate (includes equivalency)	19,389	3,069	8,424
Some college or associate degree	32,260	4,109	10,188
Bachelor's degree or higher	56,655	2,962	10,090

Data Source: 2011-2015 ACS

TABLE 49 - EDUCATIONAL ATTAINMENT BY AGE

Educational Attainment	Age				
	18–24 yrs.	25–34 yrs.	35–44 yrs.	45–64 yrs.	65+ yrs.
Less than 9th grade	375	1,594	979	1,830	1,846
9th to 12th grade, no diploma	4,053	3,554	1,918	3,202	2,142
High school graduate, GED, or alternative	7,178	6,937	8,002	15,918	7,570
Some college, no degree	8,245	9,179	9,733	15,487	4,703
Associate degree	710	2,790	3,459	5,938	1,451
Bachelor's degree	2,028	11,549	13,159	20,232	4,058
Graduate or professional degree	244	4,294	8,186	12,344	2,947

Data Source: 2011-2015 ACS

TABLE 50 – MEDIAN EARNINGS IN THE PAST 12 MONTHS BY EDUCATIONAL ATTAINMENT

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	\$18,019
High school graduate (includes equivalency)	\$25,046
Some college or associate degree	\$31,301
Bachelor's degree	\$55,424
Graduate or professional degree	\$74,379

Data Source: 2011-2015 ACS

**Based on the business activity table below, what are the major employment sectors within your jurisdiction?**

Select Fulton, the County's economic development and workforce development initiative, identifies economic drivers in north and south Fulton County, including headquarters for several major companies (UPS, Delta, Chick-Fil-A and others) and Hartsfield-Jackson Atlanta international airport. Major employers include the Southern Company, Home Depot, Delta, SunTrust Bank, Coca Cola, UPS, and NCR. Select Fulton also identifies several focus industries including film and entertainment, logistics / supply chain, life science / health IT, global commerce, and fintech (finance and technology).

As shown in the business activity table, Fulton County's largest employment sectors are professional, scientific, and management services (26,872 jobs or 13%); transportation, warehousing, and utilities (24,260 jobs or 12%); and arts, entertainment, and accommodations (21,657 jobs or 11%).

Looking at employed Fulton County residents (i.e., "number of workers" in Table 44), the largest shares are employed in education and health care services (15,506 workers or 14%); arts, entertainment, and accommodations (13,950 workers or 13%); and professional, scientific, and management services (13,756 workers or 13%).

Fulton County industries that draw the greatest number of employees from outside of the entitlement jurisdiction boundaries include transportation, warehousing, and utilities and professional, scientific, and management services. The education and health care services industry is the only one in which Fulton County residents employed in the industry outnumber Fulton County jobs in the industry, indicating that a number of residents are working in other jurisdictions, including the city of Atlanta.

**Describe the workforce and infrastructure needs of the business community.**

According to the Fulton County Workforce Preparation and Employment System Local Workforce Development Plan (2016), jobs requiring a post-graduate degree are expected to grow most rapidly over the next decade (increasing 1.5% per year). Jobs requiring a bachelor's or associate degree are also expected to have above average growth (increasing 1.3% per year). According to a 2015 analysis of job postings, baseline skills most requested by employers include soft skills, such as communication, problem solving, and teamwork, as well as hard skills, including Microsoft Excel, Microsoft Office, and project management skills. The most requested credentials reflect the county's targeted industries of healthcare, information technology, and transportation and logistics, including certifications such as Registered Nurse, Certified Driver's License, and Cisco Certified Network Associate. The state's aging workforce combined with low local unemployment rates and anticipated business growth means that workforce development and expansion is a key local economic development need. The 2016 Workforce Preparation and Employment System Local Workforce Development Plan focuses on supporting the County's high-growth industries of healthcare, information technology, and transportation and logistics.



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

Demographic changes anticipated over the next several years are likely to impact workforce needs and job growth opportunities in Fulton County and the state of Georgia. The 2017 Metro Atlanta Regional Economic Competitiveness Strategy (CATALYST) projects that the population aged 65 and older will increase by 153% from 2016 to 2040, while other population cohorts are projected to grow by 25% or less over the same time period. As Baby Boomers age and leave the workforce, these openings will augment demand for workers generated by industry growth. The County, its businesses, and its local and regional economic development partners will benefit from a proactive approach to workforce development, including strategies currently employed by the Workforce Development Division and others.

Affordable housing, including housing near job centers, will be an increasingly important component to supporting workforce and business attraction and retention. Stakeholders interviewed as part of this planning process emphasized the need for affordable housing that is close to jobs, resources, and transportation, including a need for a variety of housing types and sizes. This housing is of particular need for seniors, people with disabilities, people transitioning from homelessness, and people living with HIV/AIDS. With increasing demand for housing in areas closer to the Atlanta city center, affordable housing close to jobs, resources, and transportation is becoming more difficult to find in the county, and low-income residents are often unable to access these areas of higher opportunity or are displaced by rising housing costs. Rising housing costs are also a primary contributor to high levels of homelessness in the county. To that end, there is a growing need to devote resources to the development of affordable housing with access to jobs, services, and transportation.

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

The 2017 Metro Atlanta Regional Economic Competitiveness Strategy (CATALYST) identified the following strengths, weaknesses, opportunities, and threats regarding talent and education in the region:

**Strengths:**

- Metro Atlanta is well educated. At both the associate's degree and bachelor's degree levels, educational attainment within the region exceeds the U.S. average.
- Racial and ethnic minorities in the region are more likely to possess a post-secondary education than their counterparts in many other major metropolitan areas.
- Programs such as the Georgia Hope Scholarship and public Pre-K programs provide the state with remarkable infrastructure from which to increase access to quality education.
- The region's many colleges and universities have substantial levels of R&D activity.
- Recent initiatives such as Learn4Life, a regional consortium dedicated to improving public education throughout metro Atlanta, and the MAX Provider Portal, demonstrate the power of regional collaboration.
- The Hope Career Grant provides free tuition to technical school students enrolled in programs

**Weaknesses:**

- According to Learn4Life's indicators for the five-county core region, just 20% of children attend a "high quality" early education center. Only 40% of third graders are proficient in reading, and only 38% of 8<sup>th</sup>-graders are proficient in math.
- CATALYST survey participants characterized access to early childhood/ pre-school education, elementary and middle schools, and high schools as 'below average.'
- Although educational attainment levels of racial and ethnic minorities in metro Atlanta exceed those of other regions, they significantly trail educational attainment levels of our region's White, Non-Hispanic individuals.
- Post-secondary enrollment rates among graduating high school students in many counties within the region are less than the statewide average of 60%.
- There are growing concerns that schools don't do enough to boost students' career readiness or promote lifelong learning.

**Connected Opportunities:**

- Improving educational outcomes throughout metro Atlanta will ultimately contribute to increased entrepreneurship and innovation, improve economic mobility, and heighten the region's global competitiveness.

**Connected Threats:**

- Poor educational outcomes often reflect concentrated poverty within a community. Unless the region can more effectively combat poverty and improve educational outcomes, too many residents will lack the skills necessary to thrive in today's workplace. Without a highly skilled workforce, the region's global business environment will also become less competitive.

**Describe any current workforce training initiatives, including those supported by Workforce Investment Boards, community colleges and other organizations. Describe how these efforts will support the jurisdiction's Consolidated Plan.**

A variety of workforce training initiatives are available in Fulton County, indicating that local partners are responding to needs of the business community and workforce. Generally, workforce training initiatives support Consolidated Plan goals related to economic development but also serve as potential opportunities to reduce poverty by helping unemployed and underemployed residents connect with higher-paying, in-demand jobs. The following are available in Fulton County, either to businesses or residents:

*The Office of Workforce Development/WorkSource Fulton*

- The Office of Workforce Development provides career and training services to adults, dislocated workers, and youth of Fulton County.
- Fulton County offers training for residents who meet the following criteria:
  - Residents laid off by an employer in the County within the last 12 months
  - Underemployed residents who make minimum wage, and need better employment
- Fulton County's Workforce Development services are offered in three locations in North, Central and South Fulton.

- Programs offered include a paid summer youth internship program in which youth aged 16-24 can develop career skills, recruitment fairs with employers, and programs focused on training for veterans.
- WorkSource Fulton can also provide participants with Individual Training Accounts (ITA) for attendance at an education institution approved by the state of Georgia.

### *Higher Education in Fulton County*

- As described in the Fulton County Workforce Preparation and Employment System Local Workforce Development Plan (2016), Fulton County is home to nearly 50 institutions offering academic degrees and credentials. The plan notes that these institutions awarded 22,700 degrees and awards in the county in 2014. Of these academic awards, nearly 50% were for Bachelor's degrees.

**Does your jurisdiction participate in a Comprehensive Economic Development Strategy (CEDS)? If so, what economic development initiatives are you undertaking that may be coordinated with the Consolidated Plan? If not, describe other local/regional plans or initiatives that impact economic growth.**

Fulton County participated in the 2017 Metro Atlanta Regional Economic Competitiveness Strategy (CATALYST), a regional plan prepared by the Atlanta Regional Commission and covering Cherokee, Clayton, Cobb, DeKalb, Douglas, Fayette, Fulton, Gwinnett, Henry and Rockdale counties. The strategy serves as the Comprehensive Economic Development Strategy (CEDS) in accordance with the U.S. Economic Development Administration's requirements, and as a guide for policies, programs, and investments to support economic development in the region.

The 2017 Metro Atlanta Regional Economic Competitiveness Strategy identified four overarching pillars for regional prosperity, including:

- **“Engaged and employed.** The goal of this pillar is that everyone can thrive in a robust global economy. To have a vibrant regional economy requires metro Atlanta's leaders to proactively position the region as a global business destination, collaboratively investing in the infrastructure, workforce, quality of life, and other assets that help businesses thrive. It also entails providing ample avenues for all residents to create their own businesses and re-engage in the workforce if they have disengaged.
- **Prepared and productive.** The goal of this pillar is that everyone is prepared to advance in a productive career and lifelong. The region must continually invest in improving educational outcomes for all residents. Ensuring successful educational outcomes starts with early childhood programs and carries through K-12, training, higher education, and adult learning – equitably in every community, in every school in the region. Offering a seamless ladder of educational opportunities aligned with, and anticipating, the needs of business is one of the most important steps to achieving CATALYST's vision.
- **Healthy and housed.** The goal of this pillar is that everyone has options for a healthy lifestyle and quality, affordable housing. Engaging residents in productive careers begins with ensuring that everyone has attainable opportunities to be healthy and have a home. Only after these immediate

needs are met can residents effectively connect with their communities, pursue training and education, and seek jobs.

- **Connected and resilient.** The goal of this pillar is that everyone can connect to the people, places and information needed to have a resilient, prosperous life. Being connected to the community whether physically via transit or civically through volunteerism, cultural activities, and political processes will improve the ability of residents to personally improve their quality of life.”

The plan’s strategic framework was developed in terms of these broader pillars (see Figure 3).

Economic development continues to be a goal for Fulton County and its Workforce Development Division, and activities the County anticipates undertaking over the next five years will support several of the strategies listed in the CEDS. The County’s Workforce Development Division will continue efforts to provide job training and employment readiness education, as described in the response to the preceding question.

**FIGURE 3: METRO ATLANTA REGIONAL ECONOMIC COMPETITIVENESS STRATEGY COMPLETE STRATEGIC FRAMEWORK**

<b>ENGAGED &amp; EMPLOYED</b>	<ul style="list-style-type: none"> <li>Expand the regional economic development marketing alliance’s activities.</li> <li>Further amplify and activate Aerotropolis Atlanta.</li> <li>Promote and expand resources available for entrepreneurs and small businesses.</li> <li>Establish an entrepreneurial platform dedicated to solving regional problems.</li> <li>Expand programs that connect corporations and MWSBEs.</li> </ul>
<b>PREPARED &amp; PRODUCTIVE</b>	<ul style="list-style-type: none"> <li>Fully support Learn4Life and replicate similar cradle-to-career initiatives throughout metro Atlanta.</li> <li>Raise awareness of viable STEAM career tracks among K-12 students and their parents.</li> <li>Increase early childhood education funding and quality programming.</li> <li>Continue to expand the region’s involvement in HDCI, creating sector partnerships and programming.</li> <li>Support the development of entrepreneurial thinking among the region’s youth.</li> <li>Increase businesses’ engagement in schools across the region.</li> <li>Address gaps in education, workforce development, and social support offerings across the region.</li> <li>Establish a collective impact approach to reengage disconnected workers across the region.</li> <li>Expand expungement programs for nonviolent criminal offenders.</li> </ul>
<b>HEALTHY &amp; HOUSED</b>	<ul style="list-style-type: none"> <li>Facilitate a regional housing strategy.</li> <li>Build the capacity of nonprofits and other organizations dedicated to housing.</li> <li>Provide local governments with a toolkit to address poverty.</li> <li>Expand resources to help communities improve healthy, safe lifestyles for their residents.</li> <li>Update requirements of ARC’s programs to reflect the spirit of the CATLYST Strategy.</li> </ul>
<b>CONNECTED &amp; RESILIENT</b>	<ul style="list-style-type: none"> <li>Study and take action on the inheritance of poverty and its negative impacts.</li> <li>Establish an organization dedicated to advancing diverse leadership across the region.</li> <li>In a comprehensive regional approach, protect and connect future green spaces.</li> <li>Seek funding diversity for the LCI to support broader efforts.</li> <li>Expand ARC’s Regional Public Art Program and similar programs.</li> <li>Increase area counties’ participation in a regional transit network.</li> <li>Host regional forums to ensure the region is prepared for autonomous vehicles and other disruptors.</li> </ul>

---

**MA-50 NEEDS AND MARKET ANALYSIS DISCUSSION****Are there areas where households with multiple housing problems are concentrated? (include a definition of "concentration")**

HUD defines four types of housing problems: (1) cost burden of more than 30%, (2) more than one person per room, (3) lack of complete kitchen facilities, and (4) lack of complete plumbing facilities. The HUD-provided map below shows the share of households within each census tract that have at least one of these housing problems. A concentration of households with housing needs is defined as a census tract where more than 40% of households have at least one housing need.

Using the above definition, there are many census tracts in Fulton County – primarily in south Fulton County – that demonstrate a clustering of households with housing needs. Incorporated cities in south Fulton County as well as the remainder of unincorporated Fulton County all contain census tracts where more than 40% of households have at least one housing problem. Furthermore, several census tracts experience housing problems at an even higher rate than the rest of south Fulton County. Census tracts extending between Camp Creek Parkway and Roosevelt Highway, and those along Old National Highway south to Burdett Road show that more than 50% of their households have at least one housing problem.

Census tracts where households demonstrate one or more housing needs are generally tracts where the population is predominantly African American. Figures 4 through 6 show strong patterns of disproportionate representation of Black households in census tracts where households with housing needs are clustered.

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

Geographic patterns for racial and ethnic minorities in Fulton County are shown in Figure 4 and 6. Concentration is defined as a census tract in which more than 50% of residents are racial and ethnic minorities.

Excluding the cities of Hapeville and Chattahoochee Hills, nearly all census tracts in south Fulton County are predominantly African American (i.e. greater than 50%), with several census tracts identifying rates of Black residency greater than 90%. North Fulton County also has several census tracts whose population is largely racial and ethnic minorities. These areas, primarily in Alpharetta, have greater diversity amongst the racial and ethnic minority groups than in south Fulton County. For example, the population in census tract 116.21 in Alpharetta is 21% Black, 29% Asian and 6.5% Hispanic. Similarly, the population in census tract 116.19 in Alpharetta is 17% Black, 23% Asian and 9% Hispanic.

In its fair housing planning guidance, HUD defines racially or ethnically concentrated areas of poverty (R/ECAP) where more than one-half of the population are people of color and the individual poverty rate is over 40%. There are three R/ECAP census tracts in the study area of Fulton County, as shown in Figure 7. The R/ECAP census tracts are in the cities of East Point and College Park, close to the Hartsfield Jackson International Airport.



Census tract 100, located in East Point, is bound by Sylvan Road to the east, Cleveland Avenue to the north and Central Avenue to the south. Census tract 106.01 in College Park is bound by Main Street to the east, Washington Road to the west and Harvard Avenue to the south. Census tract 106.03 in College Park covers the eastern part of Camp Creek Parkway, with most of the population in this tract living west of Hershel Road.

HUD also identifies CDBG-eligible block groups where there are concentrations of low- and moderate-income families. HUD defines a concentration as a block group where low- and moderate-income households make up more than 51% of total households in the block group. Outside of those block groups in Atlanta, there are 38 block groups in Fulton County with concentrations of low- and moderate-income households.<sup>23</sup> These block groups are located solely in the cities of south Fulton County, to include East Point, College Park, Hapeville, South Fulton, Union City, Fairburn, Palmetto and Chattahoochee Hills. These cities have the highest rates of housing need and the largest African American populations in the county.

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

R/ECAP areas in College Park and East Point predominantly have renter households. In census tract 110, located in East Point, renters compose 65% of all occupied units, compared to 35% of units that are owner occupied. In census tract 106.01 in College Park, 38% of residents are homeowners compared to 62% who are renters. In census tract 106.03, homeownership is at 18% of all occupied units, compared to 82% renters.

### **Are there any community assets in these areas/neighborhoods?**

R/ECAP areas in College Park and East Point contain several community assets. Census tract 106.01 in College Park is largely residential, but is also home to College Park City Hall, College Park Elementary School, Frank McLarin High School, the Woodward Academy Primary School (private), the northern end of the Main Street commercial district, a grocery store, the Metro Atlanta Urban Farm, the College Park library, and the Wayman & Bessie Brady Recreation Center. Census tract 106.03 contains the College Park Regional Health Department, the Main Street commercial district, the city's post office, The Main Street Academy and the Georgia International Convention Center. Census tract 110 is home to the Wellstar Atlanta Medical Center South, Parklane Elementary School, KIPP South Fulton Academy, and the John D. Miller Athletic Complex.

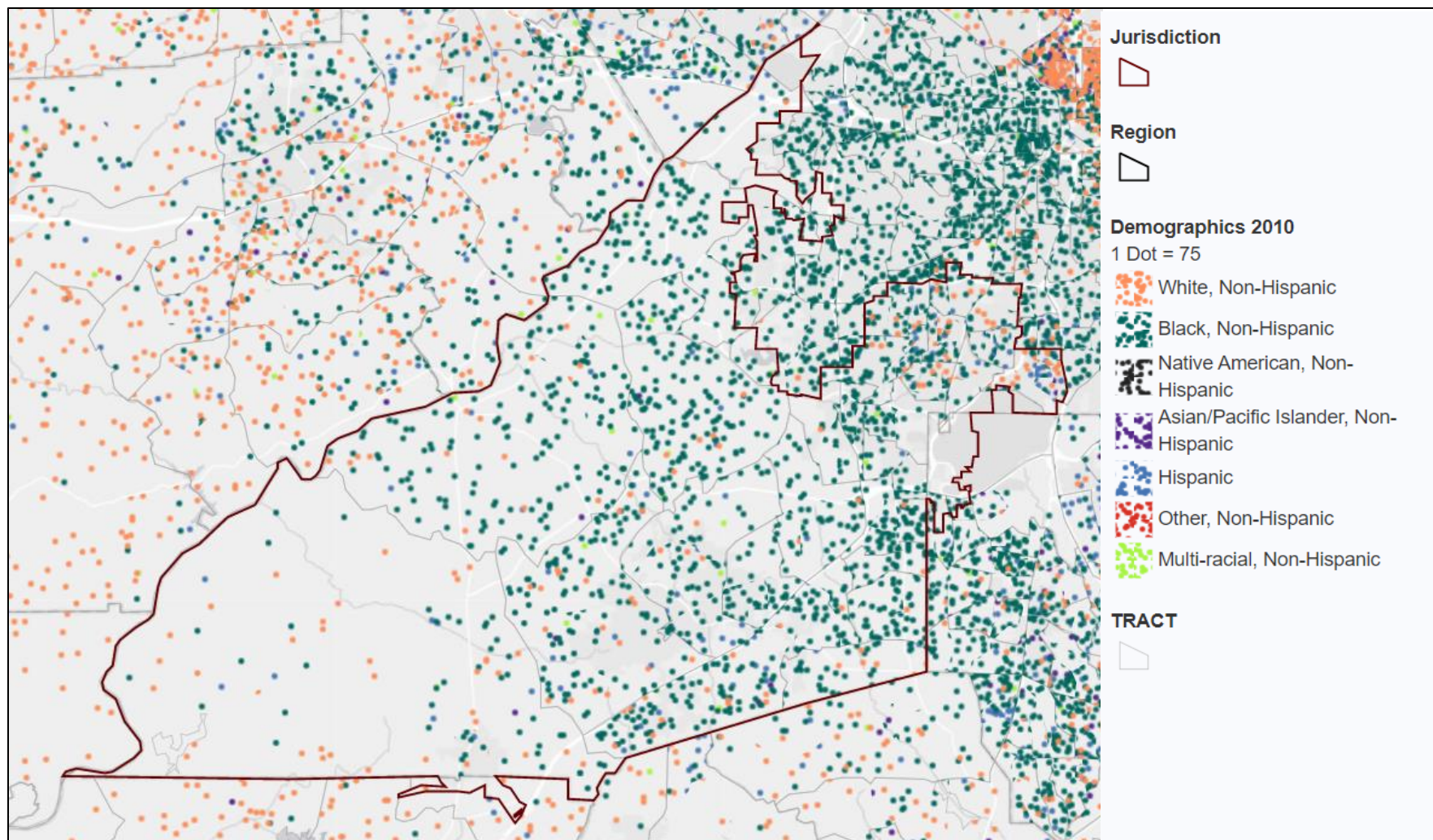
### **Are there other strategic opportunities in any of these areas?**

Two of three RECAP areas in Fulton County abut MARTA rail stations, providing access to public transportation throughout the region. All R/ECAP areas are close to the Hartsfield-Jackson International Airport, which provides employment opportunities for residents in the area.

---

<sup>23</sup> HUD Maps, "Low- and Moderate-Income Area Data, based on 2011-2015 ACS."  
<https://hud.maps.arcgis.com/apps/webappviewer/index.html?id=ffd0597e8af24f88b501b7e7f326bedd>

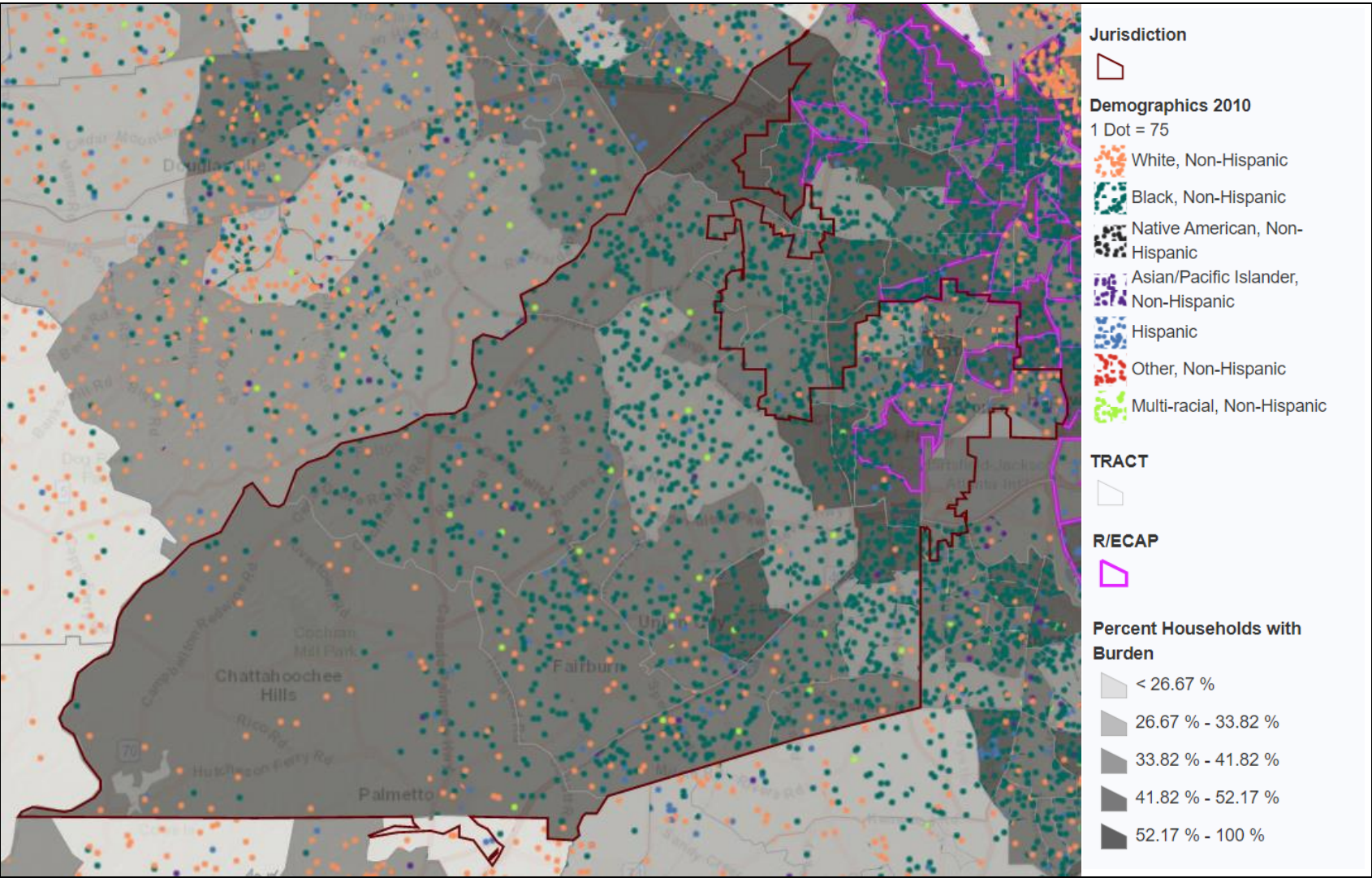
FIGURE 4 – DEMOGRAPHIC DISTRIBUTION BY RACE AND ETHNICITY IN SOUTH FULTON COUNTY



Map Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, <https://egis.hud.gov/affht/>



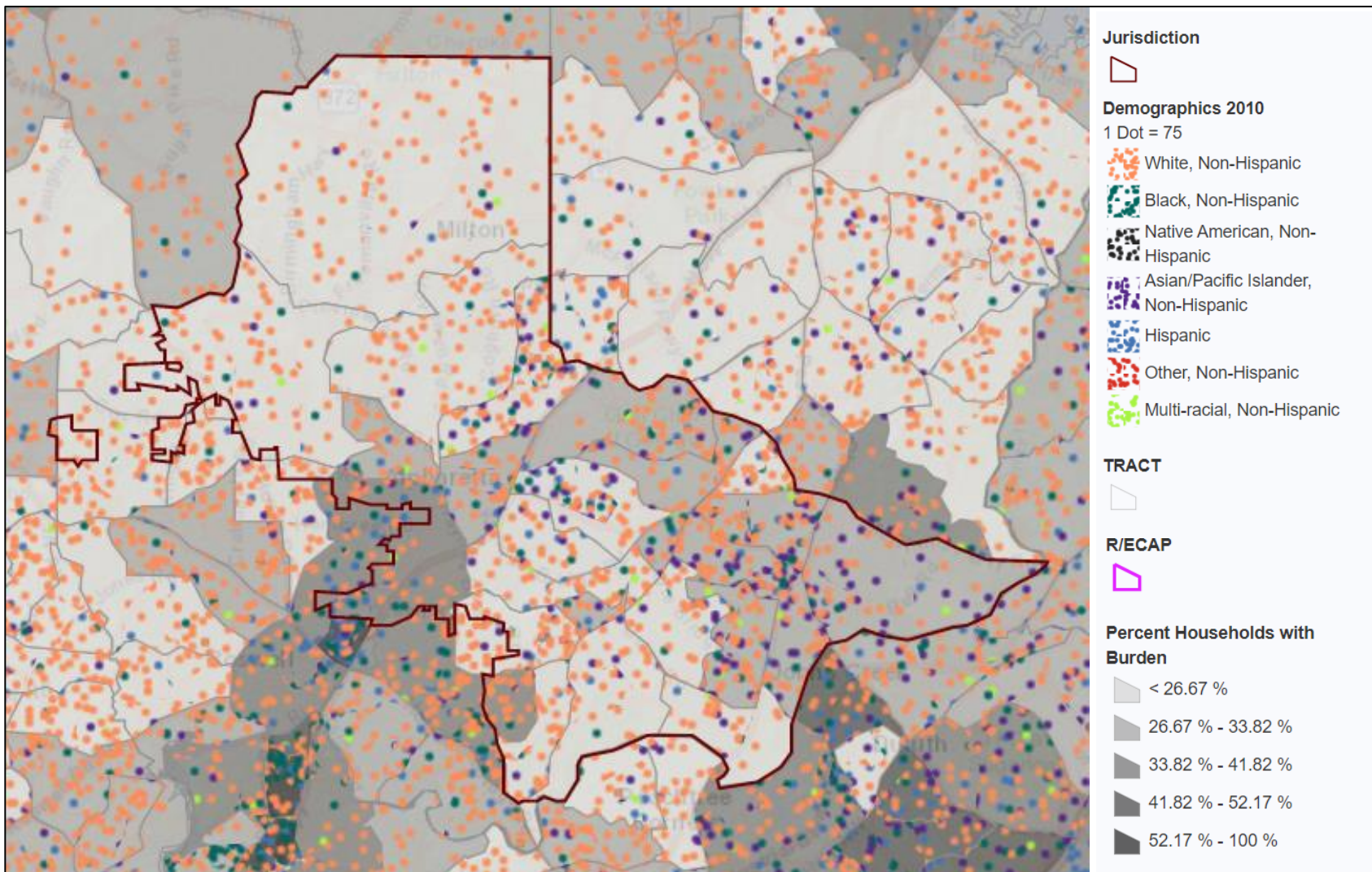
FIGURE 5 – PERCENTAGE OF HOUSEHOLDS WITH HOUSING BURDENS IN SOUTH FULTON COUNTY



Map Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, <https://egis.hud.gov/affht/>

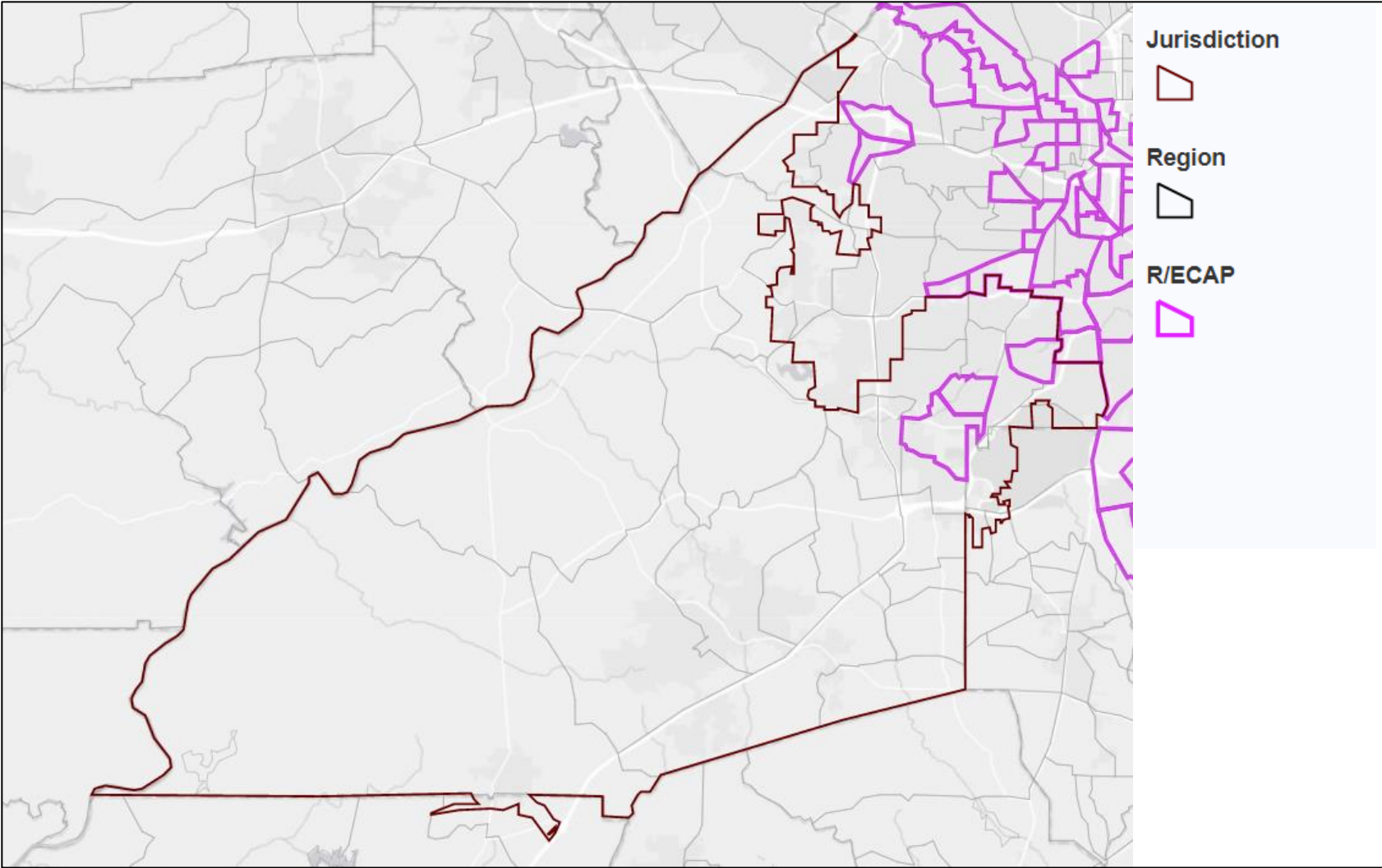


FIGURE 6 – PERCENTAGE OF HOUSEHOLDS WITH HOUSING BURDENS IN NORTH FULTON COUNTY



Map Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, <https://egis.hud.gov/affht/>

FIGURE 7 – R/ECAP AREAS IN SOUTH FULTON COUNTY



Map Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, <https://egis.hud.gov/affht/>

---

**MA-60 BROADBAND NEEDS OF HOUSING OCCUPIED BY LOW- AND MODERATE-INCOME HOUSEHOLDS - 91.210(A)(4), 91.310(A)(2)**

**Describe the need for broadband wiring and connections for households, including low- and moderate-income households and neighborhoods.**

Broadband connectivity is a vital resource which increases citizens' equitable access to employment opportunities, education, and other personal enrichment found on the internet. Low- to moderate-income households often have less broadband access than their wealthier counterparts, creating a digital divide that limits personal and professional opportunities for low-income households. In 2015, the FCC defined broadband as internet access with download speeds of the 25 Megabits per second (Mbps) and upload speeds of 3 Mbps (otherwise notated as 25/3). With broadband access, internet users can partake in file downloading, video streaming, email and other critical features that are necessary for modern communications.

Fulton County's broadband connectivity is captured in the Phase I Georgia Broadband Map published by the Georgia Department of Community Affairs. The Phase I map is based upon the Federal Communications Commission's collection of self-reported data from broadband service providers on Form 477. Some sources have criticized the Form 477 methodology, noting that any census tract with *at least one residential or business broadband consumer* is counted as being "served." Georgia has begun to produce its own broadband maps, known as the Phase II maps, which are based on addresses instead of census tracts, and require broadband service providers to report each address they serve. Georgia's pilot broadband maps by county utilized a much higher threshold to qualify census tracts as "served" - 81% of addresses in the census tract have broadband access. Three rural Georgia counties studied in the pilot program showed vast differences in actual broadband coverage from what was reported in FCC maps, indicating the possibility for severe inaccuracies when using FCC maps to identify areas served by broadband.

Fulton County's broadband service coverage, as it exists on the current Phase I Georgia Broadband Map, is shown in the figure below. Several areas of the county are shown as "unserved," including nearly 40 census blocks in Chattahoochee Hills Country and lower South Fulton (city), and another 40 census blocks along Fulton Industrial Boulevard along the western boundary. The map also shows scattered unserved census blocks, primarily in the southern Fulton cities of Palmetto, Fairburn, Union City and East Point. Unserved census blocks in north Fulton county tend to be adjacent to SR 400 in Alpharetta. FCC data indicates that most census blocks in the county are served with broadband, although the number of addresses with broadband access are still unknown.

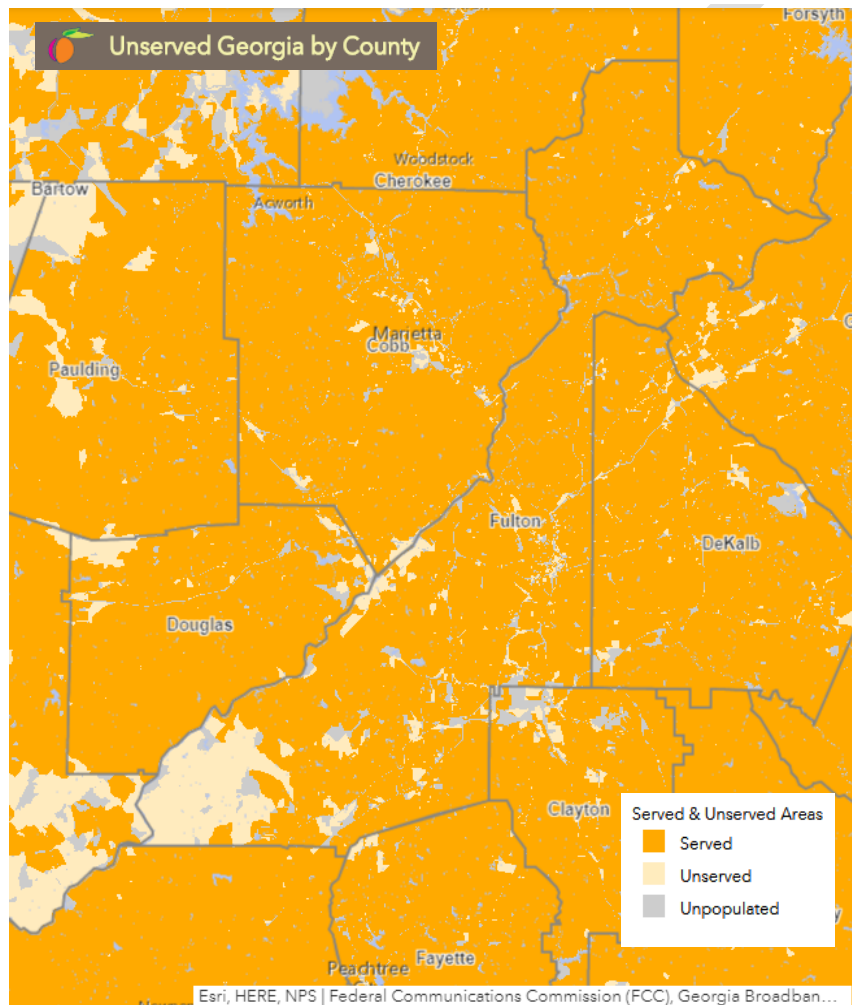
The largest shares of low-income residents in Fulton County live in the southern part of the county. According to the 2011-2015 5-Year ACS, census tracts 110, 113.05, and 106.03 in College Park and East Point have the median incomes less than 50% AMI (less than \$28,604 per year). The Phase I Broadband Map indicates that these census tracts have both "served" and "unserved" areas. The "unserved" census



blocks tend to be adjacent to major roads, such as Central Avenue in East Point and Camp Creek Parkway in both East Point and College Park.

Twelve additional census tracts in southern Fulton County have median incomes between 50% AMI and 80% AMI (or \$45,766). These census tracts are dispersed throughout several cities including South Fulton (3 tracts), East Point (3), College Park (2), Union City (2), Fairburn (1) and Hapeville (1). The Phase I Map shows that these tracts largely have broadband services, except for many scattered unserved census blocks. The largest clusters of these unserved or unpopulated census blocks appear to cover industrial sites, such as the former Shannon Mall site in Union City and the Coca-Cola building on Edison Road in College Park. Unserved areas are also shown along major roadways, such as I-85 in Hapeville. A more accurate assessment of broadband coverage in Fulton County should be captured upon the availability of address level service data.

**FIGURE 8 – PHASE I GEORGIA BROADBAND MAP, FULTON COUNTY**



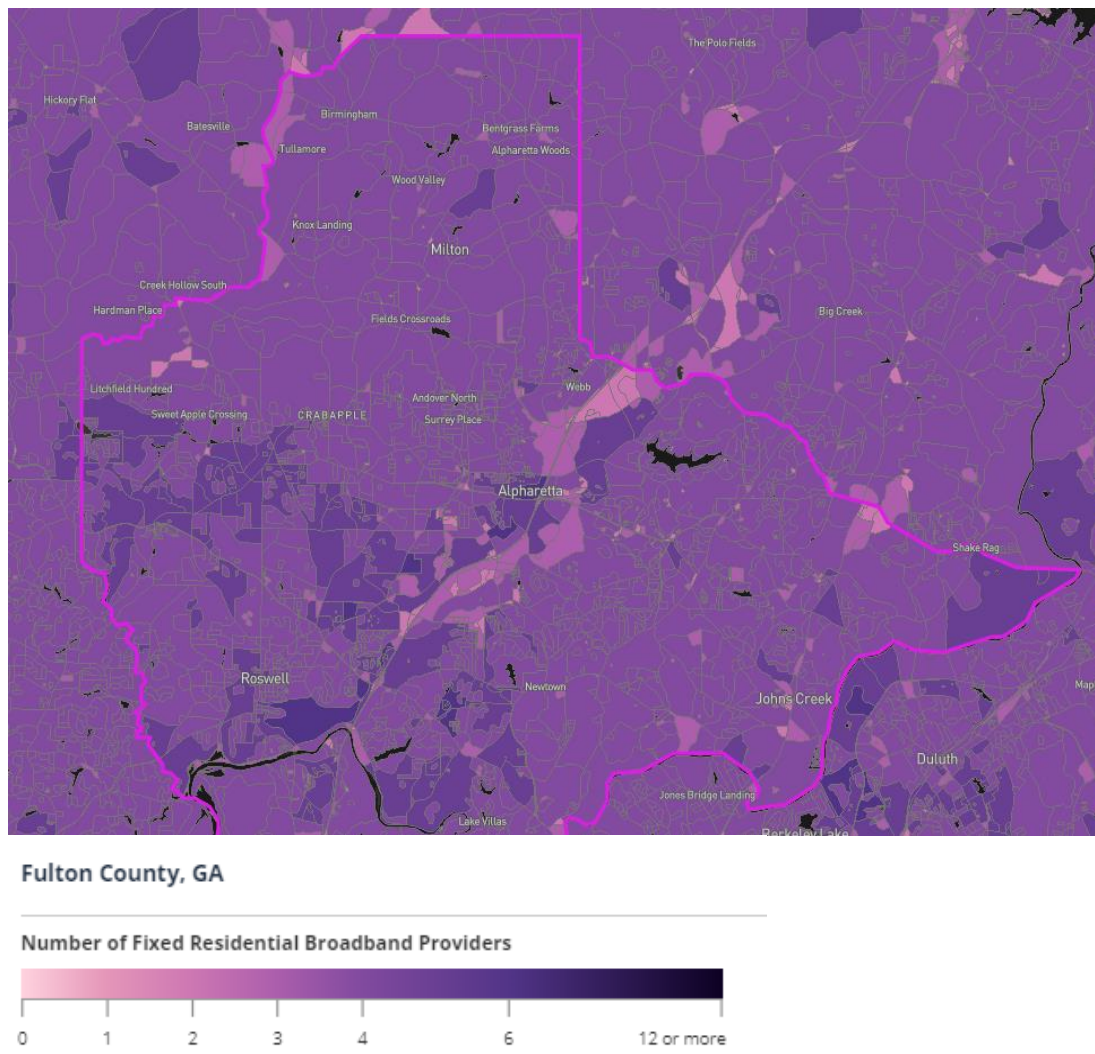
**Data Source:** GA Department of Community Affairs

<https://broadband.georgia.gov/maps/unserved-georgia-county>

**Describe the need for increased competition by having more than one broadband internet service provider serve the jurisdiction.**

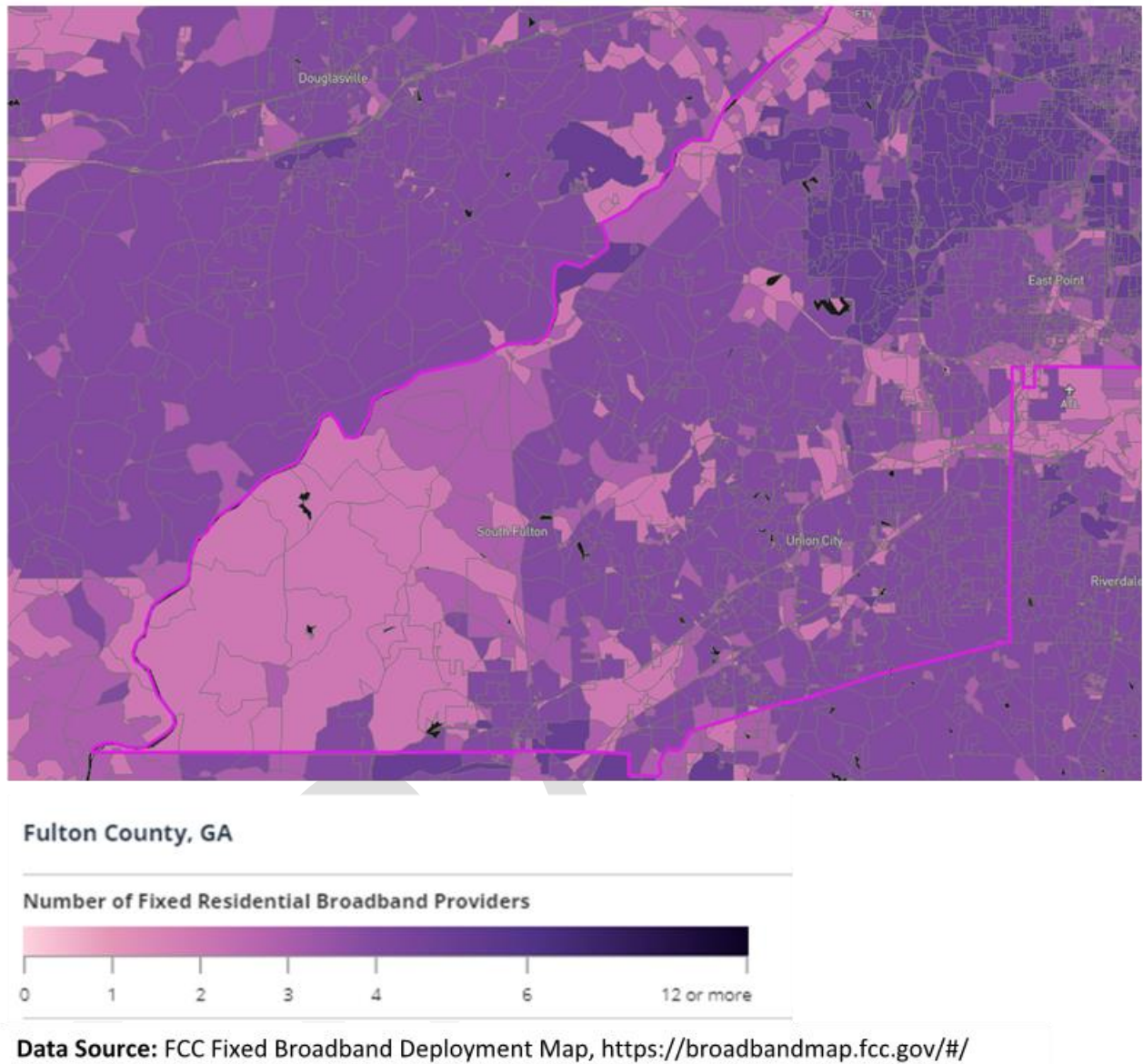
According to the Federal Communications Commission’s Interactive Broadband Map, residential areas in the Fulton County have several cable broadband providers, offering broadband via fiber, cable, ADSL and satellite technologies. Across Fulton County, AT&T is the main provider of broadband via fiber-optic cable, although fiber is also provided by Windstream Holdings and Hotwire Communications in some commercial districts of Alpharetta abutting SR 400, as well as a residential subdivision in Milton. Comcast offers fixed cable broadband throughout most of Fulton County, with minor competition from Charter Communications in scattered sites in north Fulton (e.g. Northview High School in John’s Creek). AT&T also offers ADSL technology in most areas of the county. ViaSat and Hughes Network Systems universally offer satellite internet, which is the only provider for many scattered areas sites throughout the county; however, site receiving satellite service tend to be undeveloped or industrial sites.

**FIGURE 9 – NUMBER OF BROADBAND PROVIDERS BY CENSUS BLOCK, NORTH FULTON COUNTY**



**Data Source:** FCC Fixed Broadband Deployment Map, <https://broadbandmap.fcc.gov/#/>

FIGURE 10 – NUMBER OF BROADBAND PROVIDERS BY CENSUS BLOCK, SOUTH FULTON COUNTY



**MA-65 HAZARD MITIGATION - 91.210(A)(5), 91.310(A)(3)****Describe the jurisdiction's increased natural hazard risks associated with climate change.**

The impact of increasing natural hazard risks driven by with climate change on low- and moderate-income households is an important consideration for regional planners, city staff, and housing and service providers in Fulton County and the region. The Fulton County Multijurisdictional Hazard Mitigation Plan, updated in 2016, identifies hazards most likely to impact the county and its municipalities. The plan notes several likely, possible, and unlikely hazards in Fulton County. Based on average ratings from municipalities in Fulton County, severe weather, tornadoes, and flooding are likely hazards, while winter storms, heat waves, droughts, wildfire, tropical systems, dam failure, and sinkholes are possible hazards (see Figure 11). The plan identifies and analyzes mitigation actions and projects for each participating municipality.

**FIGURE 11 – COUNTYWIDE RISK ASSESSMENT MATRIX**

Countywide Risk Assessment Matrix											
Jurisdiction	Hazards Assessed										
	Severe Weather	Tornadoes	Flood	Winter Storm	Heat Wave	Drought	Wildfire/Urban Interface	Tropical System	Dam Failure	Sinkhole	Earthquake
Alpharetta	L	L	L	L	P	L	P	P	P	U	P
Atlanta	L	L	L	P	P	P	U	P	P	P	U
Chattahoochee Hills	L	L	P	P	P	P	P	U	U	U	U
College Park	L	P	P	P	P	U	P	P	U	P	U
East Point	P	P	L	P	P	L	P	P	U	P	U
Fairburn	H	H	P	P	P	P	P	U	P	P	U
Hapeville	L	L	P	L	L	P	P	P	U	U	P
Johns Creek	U	P	P	P	P	L	U	P	U	P	U
Milton	L	L	L	L	P	P	P	U	P	P	P
Mountain Park	P	P	L	P	P	P	L	U	P	P	U
Palmetto	L	L	U	L	L	P	P	P	P	U	U
Roswell	L	L	L	P	P	P	U	P	P	U	U
Sandy Springs	U	P	P	U	U	U	P	P	P	P	P
Unincorporated S. Fulton	H	H	H	H	H	H	L	H	L	L	P
Union City	L	L	L	L	P	P	P	P	U	U	U
Countywide Ranking by Average Scores	2.73 L	2.73 L	2.53 L	2.40 P	2.20 P	2.20 P	1.93 P	1.86 P	1.67 P	1.67 P	1.33 U

H = Highly Likely (4 points)

L = Likely (3 points)

P = Possible (2 points)

U = Unlikely (1 points)

Source: Fulton County Multi-Jurisdictional Hazard Mitigation Plan (2016)



**Describe the vulnerability to these risks of housing occupied by low- and moderate-income households based on an analysis of data, findings, and methods.**

The degree to which low- and moderate-income households are vulnerable to increased natural hazards associated with climate change is an important consideration for jurisdictions and regions in preparing environmental resiliency and other plans. The Fourth National Climate Assessment (2018) notes that vulnerable populations, including lower-income and other marginalized communities, have reduced capacity to prepare for and cope with extreme weather and climate change-related events. Because these communities are expected to experience greater impacts, it is important that jurisdictions prioritize adaptation actions for the most vulnerable populations.<sup>24</sup> Five-Year 2014-2018 American Community Survey data indicates that:

- An estimated 27,939 of the 200,538 households (13.9%) in the county (outside of the city of Atlanta) have incomes of less than \$25,000 per year; and
- An estimated 9.8% of Fulton County residents (outside of the city of Atlanta) were living below the poverty level in the past 12 months.

For these reasons, a large proportion of the county's residents have reduced capacity to prepare for and cope with extreme weather and other climate change-related events.

---

<sup>24</sup> U.S. Global Change Research Program. (2018). *Fourth National Climate Assessment*. Retrieved from: <https://nca2018.globalchange.gov/>



# STRATEGIC PLAN

---

## SP-05 OVERVIEW

### Strategic Plan Overview

This strategic plan will guide the allocation of CDBG, HOME, and ESG funding during the 2020-2024 planning period to address the County's most critical needs. Goals for the 2020-2024 period focus on high priority needs identified through data analysis, community input, consultation with County staff and other public agencies, and review of relevant recently completed plans and studies. While many topics were discussed by community members in developing this Consolidated Plan, the County will focus on key areas over the next five years: (1) affordable housing for renters and homeowners; (2) homeless housing and services; (3) other public services; (4) neighborhood revitalization; and (5) public infrastructure and facility improvements. The priority and goal sections of this strategic plan further describe anticipated activities within each of these key areas.

The County relies on partnerships to achieve Consolidated Plan goals. The Department of Community Development anticipates working with other County departments, municipalities, local nonprofit and public service agencies, local housing providers, and others to address priority needs.

---

## SP-10 GEOGRAPHIC PRIORITIES – 91.215 (A)(1)

### Geographic Area

The Fulton County entitlement jurisdiction covers unincorporated Fulton County, as well as the cities of Alpharetta, Chattahoochee Hills, College Park, East Point, Fairburn, Hapeville, Milton, Mountain Park, Palmetto, and Union City, who executed a cooperation agreement with Fulton County during urban county requalification process. The cities of Atlanta, Johns Creek, Roswell, and Sandy Springs do not participate with Fulton County and receive their own HUD grant allocations.

Geographically, the Fulton County entitlement jurisdiction is divided into north and south portions by the cities of Atlanta, Roswell, and Sandy Springs, which lie in middle of the county. HUD-funded activities that qualify on an area basis may be located in any income-eligible areas with the entitlement jurisdiction. HUD-funded activities that qualify based on the clients they serve may be provided throughout Fulton County's service area.

### Geographic Distribution

Fulton County does not designate specific areas for allocation of funds as part of its strategic use of HUD grant funds. Instead, the County's programs are designed to serve low- and moderate-income individuals and households and other eligible residents throughout the County's service area.

### Rationale for the Priorities for Allocating Investments Geographically

The County chooses not to designate specific geographic target areas so that it may concentrate on priority need for services and improvements based on eligibility, availability of funds, and readiness to proceed. Emphasis, however, will be placed on increasing the quality of standard housing units in the southern part of the County while increasing the number of affordable workforce and senior housing units in the northern part of the County.

Multiple Fulton County departments, non-profit organizations, and municipalities in Fulton County are responsible for implementing programs and services under this Consolidated Plan. Consequently, local interest and initiative in developing projects and activities will determine geographic distribution of the County's housing and community development assistance. The Department of Community Development will consider the following in making annual funding decisions:

- Income eligibility of beneficiaries;
- Responsiveness to Five-Year Consolidated Plan priorities and goals;
- Affirmatively furthering fair housing;
- Leveraging of other funding;
- Sustainability over time;
- Addressing underserved needs; and
- Maximizing impact and reducing administrative costs.

### SP-25 PRIORITY NEEDS – 91.215(A)(2)

#### Priority Needs

TABLE 51 – PRIORITY NEEDS SUMMARY

1	Priority need	Develop and Preserve Affordable Rental Housing
	Priority level	High
	Population(s) served	Extremely low income Low income Moderate income Large family Families with children Elderly / frail elderly Public housing residents People with disabilities
	Geographic area(s) affected	Not Applicable
	Associated goal(s)	Decent Housing Goal #1 – Affordable Housing Construction and Preservation

	<b>Description</b>	<ul style="list-style-type: none"> <li>• Support the development of rental housing affordable to low- and moderate-income households, including projects located near employment, transportation, and other community resources.</li> <li>• As economically feasible, consider possible opportunities to extend the useful life of existing affordable rental housing by funding acquisition and/or rehabilitation activities.</li> <li>• Support the development of affordable rental housing for seniors, veterans, people with disabilities, or other special needs households, such as people who are formerly homeless or at risk of homelessness.</li> </ul>
	<b>Basis for priority</b>	Affordable rental housing was identified as a priority need by focus group participants, interviewees, and survey takers. Community members noted that transitional/bridge housing is needed to move people out of homelessness. The <i>Fulton County Strategic Plan</i> also called for better access to affordable housing as a component of ensuring that all residents are self-sufficient. CHAS data analyzed for this Plan concurs that housing affordability is the most widespread need for renters in the county.
2	<b>Priority need</b>	<b>Affordable Homeownership Opportunities</b>
	<b>Priority level</b>	High
	<b>Population(s) served</b>	Low income Moderate income Large families Families with children People with disabilities Public housing residents
	<b>Geographic area(s) affected</b>	Not Applicable
	<b>Associated goal(s)</b>	Decent Housing Goal #1 – Affordable Housing Construction and Preservation Decent Housing Goal #2 – Down Payment Assistance
	<b>Description</b>	<ul style="list-style-type: none"> <li>• Support development of for-sale housing units affordable to low- and moderate-income households, including homes located near employment, transportation, or other community resources.</li> <li>• Increase the number of first-time homebuyers through down payment and closing cost assistance.</li> <li>• Encourage agencies to develop affordable for-sale housing that is accessible to people with disabilities.</li> </ul>
	<b>Basis for priority</b>	Affordable housing was identified as a priority need by focus group participants, interviewees, and survey takers. Survey participants frequently selected “help buying a home” as a high need, and better access to affordable housing was an objective identified in the County’s <i>Strategic Plan</i> . Further, homeownership rate data examined in the AI shows significant gaps by race and ethnicity.

3	<b>Priority need</b>	<b>Housing Rehabilitation Assistance for Homeowners</b>
	<b>Priority level</b>	High
	<b>Population(s) served</b>	Extremely low income Low income Moderate income Large families Families with children Elderly People with disabilities
	<b>Geographic area(s) affected</b>	Not Applicable
	<b>Associated goal(s)</b>	Decent Housing Goal #3 – Homeowner Rehabilitation
	<b>Description</b>	<ul style="list-style-type: none"> <li>Preserve the existing affordable housing stock by assisting income-eligible homeowners with housing rehabilitation and repairs, with an emphasis on housing problems affecting health and safety.</li> </ul>
4	<b>Basis for priority</b>	Assistance for homeowners to make housing improvements (including energy efficiency improvements) was a priority need identified survey participants. CHAS data analyzed for this Plan indicates that housing affordability is a widespread issue for low- and moderate-income homeowners, making home repair projects difficult to afford.
	<b>Priority need</b>	<b>Rental Assistance, Homelessness Prevention, and Rapid Rehousing</b>
	<b>Priority level</b>	High
	<b>Population(s) served</b>	Extremely low income Low income Large families Families with children Elderly / frail elderly Homeless individuals, families, and veterans People with disabilities Victims of domestic violence
	<b>Geographic area(s) affected</b>	Not Applicable
	<b>Associated goal(s)</b>	Decent Housing Goal #4 – Rental Assistance Decent Housing Goal #5 – Homelessness Housing and Prevention
	<b>Description</b>	<ul style="list-style-type: none"> <li>Collaborate with housing authorities in Fulton County to assist income-eligible renter households with tenant-based rental assistance.</li> <li>Collaborate with agencies in the CoC and others to assist households at-risk of homelessness with short-term rental payments, utility assistance, rapid rehousing, or other assistance.</li> <li>Collaborate with agencies in the CoC and others to assist people who are homeless through provision of and access to emergency, transitional, and permanent housing to enable them to move to appropriate housing and achieve greater stability.</li> </ul>

	<b>Basis for priority</b>	Homelessness prevention was the number one priority identified by community members who participated in the survey. Transitional housing, permanent housing, and access to shelters were also identified as high needs. Continuum of Care members and other organizations serving homeless populations identified rental assistance and assistance finding housing for households with low and extremely low incomes as priorities for households who are homeless or at-risk of homelessness. Fulton County's <i>Homeless Plan</i> calls for diversion and rapid rehousing as strategies to reducing homelessness. The County's <i>Strategic Plan</i> identifies expanded housing options for homeless populations as a key strategy for ensuring that all people are safe in Fulton County.
5	<b>Priority need</b>	<b>Public Services</b>
	<b>Priority level</b>	High
	<b>Population(s) served</b>	Extremely low income Low income Families with children Elderly People with disabilities Victims of domestic violence
	<b>Geographic area(s) affected</b>	Not Applicable
	<b>Associated goal(s)</b>	Suitable Living Environment #1 – CDBG Public Services
	<b>Description</b>	<ul style="list-style-type: none"> <li>Fund eligible public services to serve low- and moderate-income residents, youth, seniors, people with disabilities, and other special needs populations.</li> </ul>
	<b>Basis for priority</b>	A variety of public services were ranked as priority needs by community members who participated in the survey. Public meeting and focus group attendees also identified a variety of services as needed to support Fulton County residents.
6	<b>Priority need</b>	<b>Supportive Services for Homeless Individuals and Families</b>
	<b>Priority level</b>	High
	<b>Population(s) served</b>	Chronic homelessness Individuals Families with children Mentally ill Chronic substance abuse Veterans Persons with HIV/AIDS Victims of domestic violence Unaccompanied youth
	<b>Geographic area(s) affected</b>	Not Applicable
	<b>Associated goal(s)</b>	Suitable Living Environment #2 – ESG Homeless Supportive Services

	<b>Description</b>	<ul style="list-style-type: none"> <li>Collaborate with agencies in the CoC and others to provide coordinated supportive services and case management to people experiencing homelessness to support moves to appropriate housing and greater stability. To possibly include but not be limited to:               <ul style="list-style-type: none"> <li>Case management</li> <li>Street outreach</li> <li>Transportation</li> <li>Childcare</li> <li>Job training or job search assistance</li> <li>Health and mental health services</li> <li>Services for people with disabilities</li> <li>Services to help households access benefits</li> </ul> </li> </ul>
	<b>Basis for priority</b>	Housing and services for people who are homeless were consistently ranked as priority needs by community members who participated in the survey. Continuum of Care members and others identified wrap-around services as a key component for helping individuals and families obtain housing and gain stability once they are housed. The County's <i>Homeless Plan</i> includes objectives to provide adequate support services for housing stability and strengthening the network of social services for all homeless sub-populations.
7	<b>Priority need</b>	<b>Fair Housing Education and Enforcement</b>
	<b>Priority level</b>	High
	<b>Population(s) served</b>	All
	<b>Geographic area(s) affected</b>	Not Applicable
	<b>Associated goal(s)</b>	Suitable Living Environment Goal #3 – Fair Housing Education and Enforcement
	<b>Description</b>	<ul style="list-style-type: none"> <li>Provide assistance to eligible households which might include but is not limited to:               <ul style="list-style-type: none"> <li>Fair housing education services to help residents, community organizations, and housing providers understand fair housing rights and responsibilities.</li> <li>Provide fair housing complaint investigation services.</li> <li>Consumer education and awareness around predatory lending fraudulent mortgages, and other housing scams.</li> </ul> </li> </ul>
	<b>Basis for priority</b>	Input from community members and agencies dedicated to fair housing indicate a continued need for education, enforcement, counseling, and legal services for low- and moderate-income households, including those most at-risk of housing discrimination. All recommendations call for continued fair housing education and enforcement efforts in Fulton County and Atlanta.

8	<b>Priority need</b>	<b>Community Improvements</b>
	<b>Priority level</b>	High
	<b>Population(s) served</b>	Extremely low income Low income Moderate income People with physical disabilities Non-housing community development
	<b>Geographic area(s) affected</b>	Not Applicable
	<b>Associated goal(s)</b>	Suitable Living Environment Goal #4 – Facility and Infrastructure Improvements
	<b>Description</b>	<ul style="list-style-type: none"> <li>• Work with other County departments, cooperating cities within Fulton County, and non-profit agencies.</li> <li>• Fund infrastructure improvements and public facilities such as sidewalks, street lighting, pedestrian facilities, ADA improvements, and community centers in income-eligible areas.</li> <li>• Assist community service organizations in improving or expanding physical structures to serve homeless residents, low- and moderate-income households, and other special needs populations.</li> <li>• Demolish dilapidated structures to stop the spread of blight in low- and moderate-income areas as needed.</li> </ul>
	<b>Basis for priority</b>	Street and sidewalk improvements were top infrastructure and facility need identified by survey participants, while redevelopment or demolition of abandoned properties was the top economic/community development need. Focus group participants noted the need for more sidewalks and crosswalks, community garden space, mental health centers, homeless shelters, and a one-stop-shop for homeless resources.
9	<b>Priority need</b>	<b>Program Administration</b>
	<b>Priority level</b>	High
	<b>Population(s) served</b>	All
	<b>Geographic area(s) affected</b>	Not Applicable
	<b>Associated goal(s)</b>	Program Administration
	<b>Description</b>	<ul style="list-style-type: none"> <li>• Program administration costs related to the planning and execution of community development, housing, and homelessness activities assisted with funds provided under the CDBG, HOME, and ESG programs.</li> </ul>
	<b>Basis for priority</b>	Program administration costs associated with the coordination and delivery of services to Fulton County residents.

## SP-30 INFLUENCE OF MARKET CONDITIONS – 91.215 (B)

### Influence of Market Conditions

TABLE 52 – INFLUENCE OF MARKET CONDITIONS

Affordable Housing Type	Market Characteristics that Will Influence Use of Funds Available
<b>Tenant Based Rental Assistance (TBRA)</b>	High level of cost burdens among low-income households; waiting lists for assisted housing units; housing costs compared to Fair Market Rents; and need for short-term rental assistance for homeless individuals and families transitioning to permanent housing. Currently, TBRA is provided through HUD's Section 8 Housing Choice Voucher program administered through local housing authorities, with about 3,695 vouchers in use within Fulton County. In the past, Fulton County partnered with HAFC to provide additional TBRA using HOME funds.
<b>TBRA for Non-Homeless Special Needs</b>	High level of cost burdens among low-income households, including non-homeless special needs populations; waiting lists for assisted housing units for seniors and people with disabilities; and housing costs for accessible units compared to Fair Market Rents.
<b>New Unit Production</b>	Age and condition of housing; waiting lists at existing assisted housing developments; high occupancy rates and rental rates; sales prices unaffordable to low/moderate income households. Fulton County intends to use HUD grant funding to support new affordable housing development over the next five years.
<b>Rehabilitation</b>	Age and condition of housing; issues related to substandard housing, especially for low-income renters; need for home repairs for seniors and other homeowners, including lead-based paint remediation. Fulton County intends to use HUD grant funding to support housing rehabilitation for income-eligible homeowners over the next five years.
<b>Acquisition, including preservation</b>	Subsidized housing developments anticipated to age out of their affordability period; age, condition, and availability of multifamily properties suitable for acquisition/rehabilitation; vacant/hazardous buildings identified through code enforcement. Fulton County may use HUD grant funds for acquisition and/or preservation of affordable housing over the next five years.



## SP-35 ANTICIPATED RESOURCES – 91.215(A)(4), 91.220(C) (1,2)

### Introduction

The table below shows the County's grant allocations for the 2020 program year as announced by HUD, along an estimate of anticipated grant funding for the remaining four years covered by this Consolidated Plan. This estimate assumes that funding over those four years will average to be about the same as the 2020 allocations. All grant funds will be used to support the Fulton County Department of Community Development's goals to provide decent affordable housing, a suitable living environment, and expanded economic development.

### Anticipated Resources

TABLE 53 - ANTICIPATED RESOURCES

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	Federal	Acquisition Admin and planning Economic development Housing Public improvements Public services	\$1,867,525	To be determined	\$0	\$1,867,525	\$7,470,100	CDBG funds may be used to carry out activities related to housing rehabilitation, demolition and community revitalization, public improvements, public services, economic development, and planning.

**TABLE 53 - ANTICIPATED RESOURCES (CONTINUED)**

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	Federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	\$877,448	\$0	\$0	\$877,448	\$3,509,792	HOME funds may be used for homebuyer assistance, TBRA, homeowner rehab, affordable housing development, CHDO activities, and program administration.
ESG	Federal	Conversion and rehab for transitional housing Financial assistance Overnight shelter Rapid re-housing Rental assistance services Transitional housing	\$166,641	\$0	\$0	\$166,641	\$666,564	ESG funds may be used for homeless prevention, rapid rehousing, emergency shelter and services, street outreach, HMIS, and program administration.

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

Fulton County will use federal funds to leverage additional private, state, and local funds where applicable. Fulton County funding serves as gap financing for housing development projects, which typically also include a combination of private and other public funds.

The County will comply with all HOME matching fund contribution requirements as outlined in 92.218 of the HOME regulations. These are anticipated to be satisfied through a mix of match carryover from prior years as well as other eligible sources. The County provides matching funds of twenty-five cents from the County’s General Fund for each HOME dollar expended. In the Home Ownership Program, the difference between the appraised value and the sales price is acknowledged to be a donation to affordable housing and counted toward the match requirement. General fund dollars are used to cover the cost of title search examinations for the Single-Family Rehabilitation program.

Emergency Solutions Grant (ESG) match requirements will also be met using County General Funds and in-kind contributions. These funds are matched on a dollar-for-dollar basis.

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

CDBG funding will be used to develop public facilities for public purposes using existing owned properties to include parks, recreational facilities, and community centers in low- and moderate-income areas of the County. Sidewalks, including accessibility improvements for sidewalks and curbs, may be installed in these areas, especially in locations with high pedestrian use such as routes commonly used by school children or people walking to public transportation and shopping.

**SP-40 INSTITUTIONAL DELIVERY STRUCTURE – 91.215(K)**

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

TABLE 54 - INSTITUTIONAL DELIVERY STRUCTURE

Responsible Entity	Responsible Entity Type	Role	Geography Served
Fulton County	Government	<ul style="list-style-type: none"><li>• Economic Development</li><li>• Homelessness</li><li>• Non-homeless Special Needs</li><li>• Ownership</li><li>• Rental</li><li>• Planning</li><li>• Neighborhood Improvements</li><li>• Public Facilities</li><li>• Public Services</li></ul>	Jurisdiction

Responsible Entity	Responsible Entity Type	Role	Geography Served
Housing Authority of Fulton County	PHA	<ul style="list-style-type: none"> <li>Public housing</li> </ul>	Jurisdiction
Housing Authority of the City of East Point	PHA	<ul style="list-style-type: none"> <li>Public housing</li> </ul>	Jurisdiction
Housing Authority of the City of College Park	PHA	<ul style="list-style-type: none"> <li>Public housing</li> </ul>	Jurisdiction
Housing Authority of the City of Fairburn	PHA	<ul style="list-style-type: none"> <li>Public housing</li> </ul>	Jurisdiction
Housing Authority of the City of Union City	PHA	<ul style="list-style-type: none"> <li>Public housing</li> </ul>	Jurisdiction
Housing Authority of the City of Palmetto	PHA	<ul style="list-style-type: none"> <li>Public housing</li> </ul>	Jurisdiction
City of College Park	Government	<ul style="list-style-type: none"> <li>Public facilities</li> <li>Planning</li> </ul>	Jurisdiction
City of Chattahoochee Hills	Government	<ul style="list-style-type: none"> <li>Public facilities</li> <li>Planning</li> </ul>	Jurisdiction
City of East Point	Government	<ul style="list-style-type: none"> <li>Public facilities</li> <li>Planning</li> </ul>	Jurisdiction
City of Fairburn	Government	<ul style="list-style-type: none"> <li>Public facilities</li> <li>Planning</li> </ul>	Jurisdiction
City of Hapeville	Government	<ul style="list-style-type: none"> <li>Public facilities</li> <li>Planning</li> </ul>	Jurisdiction
City of Milton	Government	<ul style="list-style-type: none"> <li>Public facilities</li> <li>Planning</li> </ul>	Jurisdiction
City of Mountain Park	Government	<ul style="list-style-type: none"> <li>Public facilities</li> <li>Planning</li> </ul>	Jurisdiction
City of Palmetto	Government	<ul style="list-style-type: none"> <li>Public facilities</li> <li>Planning</li> </ul>	Jurisdiction
City of South Fulton	Government	<ul style="list-style-type: none"> <li>Public facilities</li> <li>Planning</li> </ul>	Jurisdiction
City of Union City	Government	<ul style="list-style-type: none"> <li>Public facilities</li> <li>Planning</li> </ul>	Jurisdiction
Fulton County Continuum of Care	Continuum of Care	<ul style="list-style-type: none"> <li>Homelessness</li> </ul>	Jurisdiction
Metro Fair Housing Services, Inc.	Nonprofit Organization	<ul style="list-style-type: none"> <li>Public services</li> <li>Fair housing</li> </ul>	Region
Atlanta Legal Aid Society, Inc.	Nonprofit Organization	<ul style="list-style-type: none"> <li>Legal services</li> <li>Fair housing</li> </ul>	Region
WorkSource Fulton	Nonprofit Organization	<ul style="list-style-type: none"> <li>Economic development</li> </ul>	Jurisdiction

Responsible Entity	Responsible Entity Type	Role	Geography Served
Ryan White Program of Fulton County	Regional organization	<ul style="list-style-type: none"><li>• Homelessness</li><li>• Non-homeless special needs</li><li>• Public services</li></ul>	Region

Assess the Strengths and Gaps in the Institutional Delivery System

The Fulton County Department of Community Development works collaboratively with internal and external partners throughout the community, maintaining strong communication in order to coordinate service delivery when necessary. Strengths of the County’s institutional delivery system include:

- Communication and partnerships with local municipalities (Cities of Alpharetta, College Park, Chattahoochee Hills, East Point, Fairburn, Hapeville, Milton, Mountain Park, Palmetto, and Union City)
- Communication and partnership with other County departments and agencies, including but not limited to, the Department of Arts and Culture, Department of Behavioral Health and Developmental Disabilities, Department of HIV Elimination, Department of Human Services, Youth and Community Services Division, Senior Services, Finance Department, Office of Diversity and Civil Rights Compliance, and the Development Authority of Fulton County.
- Partnership with nonprofit agencies and developers operating in Fulton County and the metro Atlanta region.
- Periodic meetings to share ideas, problem solve, and strategize.
- History of funding municipalities, County departments, nonprofit agencies, and housing developers as subrecipients of CDBG, HOME, and ESG funds.

Gaps in the County’s institutional delivery system identified by stakeholders include:

- Capacity of nonprofit organizations
- Limited affordable housing development in north Fulton County
- Limited number of qualified nonprofit affordable housing developers with shovel-ready projects
- Coordination among housing authorities operating in Fulton County

Availability of Services Targeted to Homeless Persons and Persons with HIV and Mainstream Services

TABLE 55 - HOMELESS PREVENTION SERVICES SUMMARY

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
Homelessness Prevention Services			
Counseling/Advocacy	X	X	X
Legal Assistance	X	X	X

TABLE 55 - HOMELESS PREVENTION SERVICES SUMMARY (CONTINUED)

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

**Describe how the service delivery system, including, but not limited to, the services listed above, meets the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth).**

Prior to 2015, Fulton County served as the coordinating entity for the Atlanta Metropolitan Tri-Jurisdictional Continuum of Care (Tri-J), which included government representatives and services providers in the City of Atlanta and Fulton and DeKalb Counties. Over the last five years, however, the Tri-J dissolved and Atlanta, DeKalb County, and Fulton County each established their own Continuums of Care.

The Fulton County Continuum of Care was established in 2014 and its boundaries include Fulton County outside the City of Atlanta. Members include government representatives and homeless housing and service providers within Fulton County. As collaborative applicant, the Fulton County Department of Community Development releases an annual application for funding through the CoC. Additionally, the Department of Community Development makes ESG subrecipient grants to organizations providing street outreach, emergency shelter, homelessness prevention, and rapid rehousing to homeless persons in Fulton County.

Fulton County agencies that provide emergency shelter, transitional housing, and other services include:

- HOPE Atlanta, which provides rental and security deposit assistance, housing search assistance, one-on-one support, and rapid rehousing, as well as emergency services, crisis intervention, transitional and permanent supportive housing for persons living with HIV/AIDS. HOPE Atlanta's Supportive Services for Veterans and their Families Program funds rapid re-housing and prevention assistance to homeless veteran households.
- Partnership Against Domestic Violence, which provides supportive housing for homeless individuals and families.
- North Fulton Community Charities, which provides emergency financial assistance, thrift shop, food bank, government benefits screening, and rapid rehousing for individuals and families.
- The Community Assistance Center, which provides rental assistance, food, clothing and education resources for homelessness prevention.
- LIFT Community Development Corp., which provides housing and shelter referrals, life and financial skills training, food and clothing giveaways, transportation assistance, education and employment referrals, and mental health and wellness assessments.
- South Fulton Assessment Center, which provides financial assistance for shelter, homeless prevention and rapid rehousing, and referrals to community partners.

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

While limited funding, and thus capacity, is always a gap, Fulton County has a variety of agencies that provide housing and services for people experiencing homelessness and other special needs populations, as shown above. Agencies collaborate through the Fulton County Continuum of Care, which meets regularly and was consulted for this Consolidated Plan. Continuum of Care members identified the need for a more aggressive approach to reducing and ending homelessness, rather than the piecemeal approach that results from several agencies doing work that often overlaps without being coordinated. CoC members also noted the need for an updated directory of available services for people who are homeless, to reduce the legwork clients or service providers must do to find an appropriate agency for assistance. More broadly, focus group participants noted the need for transitional housing, including housing for people re-entry populations, to prevent unsheltered homelessness and better facilitate moves to permanent / stable housing.

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

Fulton County is currently developing a Homeless Plan that seeks to re-align homeless program management with a primary goal to achieve "Functional Zero" for all homeless populations, meaning that at any point in time, the number of people experiencing sheltered or unsheltered homelessness in any group will be no greater than the current monthly housing placement rate for that group. The Homeless Plan will seek to align recent planning efforts within the County to foster a more consistent approach to homelessness and affordable and low-cost housing.

Additionally, Fulton County intends to target its CDBG public service dollars to provide case management and wrap-around, supportive services for people experiencing homelessness. Expanding the pool of funding available for homeless supportive services beyond ESG will allow the County and its partners to make greater progress in helping clients achieve stability and prevent returns to homelessness.

DRAFT



## SP-45 GOALS SUMMARY – 91.215(A)(4)

### Goals Summary Information

TABLE 56 – GOALS SUMMARY

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Areas	Needs Addressed	Funding	Goal Outcome Indicator
1	Decent Housing Goal #1 – Affordable Housing Construction and Preservation	2020	2024	Affordable Housing	Not Applicable	Develop and Preserve Affordable Rental Housing  Affordable Homeownership Opportunities	HOME: \$526,468	Affordable housing units added
2	Decent Housing Goal #2 – Down Payment Assistance	2020	2024	Affordable Housing	Not Applicable	Affordable Homeownership Opportunities	HOME: \$1,604,000	Direct financial assistance to homebuyers: 150 households assisted
3	Decent Housing Goal #3 – Homeowner Rehabilitation	2020	2024	Affordable Housing	Not Applicable	Housing Rehabilitation Assistance for Homeowners	CDBG: \$1,000,000  HOME: \$952,048	Homeowner housing rehabilitated: 15 housing units
4	Decent Housing Goal #4 – Rental Assistance	2020	2024	Affordable Housing	Not Applicable	Rental Assistance, Homelessness Prevention, and Rapid Rehousing	HOME: \$866,000	Tenant based rental assistance / rapid rehousing: 60 households assisted
5	Decent Housing Goal #5 – Homelessness Housing and Prevention	2020	2024	Homeless	Not Applicable	Rental Assistance, Homelessness Prevention, and Rapid Rehousing	ESG: \$323,701	Homeless person overnight shelter: 1,995 persons assisted  Homelessness prevention: 5,080 persons assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Areas	Needs Addressed	Funding	Goal Outcome Indicator
6	Suitable Living Environment Goal #1 – CDBG Public Services	2020	2024	Non-Housing Community Development	Not Applicable	Public Services	CDBG: \$1,400,643	Public service activities for low/moderate income household benefit
7	Suitable Living Environment Goal #2 – ESG Homeless Supportive Services	2020	2024	Homeless	Not Applicable	Supportive Services for Homeless Individuals and Families	ESG: \$77,070	Public service activities for low/moderate income household benefit
8	Suitable Living Environment Goal #3 – Fair Housing Education and Enforcement	2020	2024	Non-Housing Community Development	Not Applicable	Fair Housing Education and Enforcement	CDBG: \$233,340	Fair housing activities for low/moderate income household benefit
9	Suitable Living Environment Goal #4 – Facility and Infrastructure Improvements	2020	2024	Non-Housing Community Development	Not Applicable	Community Improvements	CDBG: \$4,425,160	Public facility, infrastructure, or other improvement activities for low/moderate income household benefit
10	Program Administration	2020	2024	Affordable Housing Homeless Non-Housing Community Development	Not Applicable	Program Administration	CDBG: \$1,867,525  HOME: \$438,724  ESG: \$62,490	Not applicable

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

Fulton County estimates that it will assist approximately 225 families with extremely low, low or moderate incomes using HOME funds over the next five years. The County plans to assist about 15 income-eligible homeowners with housing rehabilitation (about 3 families per year) and 150 income-eligible homebuyers with down payment assistance (about 30 families per year). The County also anticipates providing 60 extremely low- or low-income families with tenant-based rental assistance using HOME funds (about 12 families per year).

---

## **SP-50 PUBLIC HOUSING ACCESSIBILITY AND INVOLVEMENT – 91.215(C)**

### **Need to Increase the Number of Accessible Units (if required by a Section 504 voluntary compliance agreement)**

Not applicable. No housing authorities in Fulton County are currently under a voluntary compliance agreement related to Section 504.

### **Activities to Increase Resident Involvement**

The HAFC maintains a resident advisory board, which reviews and contributes to each HAFC Annual Plan. The EPHA also has a resident advisory board, which meets quarterly. In addition to an advisory board, residents also participate in resident council meetings where EPHA staff are present to address resident concerns. Activities for residents, as listed on the EPHA website, include bingo, youth book club, and a Junior Resident Council for youth.<sup>25</sup>

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

The Housing Authority of Fulton County is designated a “Standard Performer” based on its 2014 score report in the Public Housing Assessment System, with a score of 88 on a 100-point scale. The Housing Authority of the City of East Point is designated as a “High Performer” with a score of 90 out of 100. Similarly, the Housing Authority of the City of College Park is also designated as a “High Performer” with a score of 90 out of 100. The Housing Authority of the City of Union City scored 87 out of 100, and as a qualifying small PHA, is subject to less frequent monitoring under HUD’s Deregulation for Small Public Housing Agencies (PHAs) Final Rule. The Housing Authorities of the City of Fairburn and the City of Palmetto are also small PHAs which scored 70 out of 100 and 90 out of 100 respectively.

---

<sup>25</sup> Housing Authority of the City of East Point. “EPHA’s Resident Council News.” Accessed December 12, 2019. <https://www.eastpointtha.org/resident-council/>

## Plan to Remove the 'Troubled' Designation

Not Applicable - None of the housing authorities in Fulton County are designated as "troubled."

## SP-55 BARRIERS TO AFFORDABLE HOUSING – 91.215(H)

### Barriers to Affordable Housing

Through the Fulton County Homeownership Program, the county provides funding for down payment assistance of up to 6% of the purchase price, or \$10,000 maximum. Stakeholders noted, however, that the amount of down payment assistance provides more assistance in the southern part of Fulton County – where home prices are generally lower – than it provides to homebuyers in north Fulton where home prices are higher, or where higher incomes may not meet the program's criteria.

The Homeownership Program allows down payment assistance to go toward existing home priced no higher than \$201,000. New homes cannot be priced above \$244,000. The program serves several cities, including Alpharetta, Chattahoochee Hills, College Park, East Point, Fairburn, Hapeville, Milton, Mountain Park, Palmetto and Union City. However, HUD Market Data on the Fulton/Dekalb County housing market area (HMA) states that around one-third of new homes built since 2013 have been built in north Fulton County. North Fulton is also projected to have home prices exceeding \$579,999 for large, single-family units. South Fulton County accounts for 21% of all new homes built since 2013, however, projected demand is \$180,000-\$279,999 for smaller single-family units and townhomes. Across the board, home prices in the region are projected to have the greatest demand in the \$280,000 to \$379,999 range, with the second greatest demand in the \$380,000 to \$479,999 range.<sup>26</sup> Those seeking to utilize the County's Homeownership Program are most likely to assist residents in the southern part of the County where home prices are projected to be lower than north Fulton.

### Strategy to Remove or Ameliorate the Barriers to Affordable Housing

In January 2019, the Fulton County Board of Commissioners passed a resolution urging municipalities in Fulton County to implement affordable housing policies. The resolution allows the Development Authority of Fulton County to apply local affordable housing ordinances to any multi-family projects completed through the Development Authority.<sup>27,28</sup> In June 2019, the Board of Commissioners signed a memorandum of understanding with local non-profit Partners for Home to provide permanent supportive housing in the county. The MOU outlines a 30-year agreement, in which Partners For Home will house chronically homeless individuals with mental or physical illnesses.<sup>29</sup>

<sup>26</sup> Ibid. p. 11

<sup>27</sup> Fulton County Board of Commissioners. "Recess Meeting – January 23, 2019"

<https://agendaminutes.fultoncountyga.gov/sirepub/mtgviewer.aspx?meetid=14181&doctype=MINUTES>.

<sup>28</sup> Fulton County Board of Commissioners. "A Resolution Urging the Municipalities Located Within Fulton County, Georgia to Adopt and Implement Policies and Initiatives in Support of Affordable Housing; and for Other Purposes."

<https://agendaminutes.fultoncountyga.gov/sirepub/cache/2/fbu5e4h2pn4phuitpwgjiyol/49528112122019063037839.PDF>

<sup>29</sup> Fulton County Board of Commissioners. "Regular Meeting – June 5, 2019"

<https://agendaminutes.fultoncountyga.gov/sirepub/mtgviewer.aspx?meetid=14196&doctype=MINUTES>

---

**SP-60 HOMELESSNESS STRATEGY – 91.215(D)****Reaching out to homeless persons (especially unsheltered persons) and assessing individual needs.**

Members of the Fulton County Continuum of Care and other homeless housing and service providers in Fulton County reach out to homeless persons, including unsheltered persons, through meal programs, day centers, and hospitals. Outreach teams regularly go under bridges, visit camps, and go to other areas to meet unsheltered homeless persons. In particular, HOPE Atlanta provides street outreach to homeless persons.

Fulton County will continue to provide financial assistance to nonprofit agencies to develop and implement a coordinated assessment system throughout the jurisdiction. The Continuum of Care will also continue providing support for annual point-in-time homeless counts.

**Addressing the emergency and transitional housing needs of homeless persons.**

Fulton County is the designated Collaborative Applicant and an active member of the Fulton County Continuum of Care (CoC). The County funds emergency and transitional housing providers through the Emergency Solutions Grants program, including:

- Travelers Aid dba HOPE Atlanta, which does complete outreach activities and provides emergency assistance and supportive housing.
- North Fulton Community Charities, which provides homeless prevention, shelter, and rapid rehousing.

Additional service providers addressing the emergency and transitional housing needs of homeless persons in Fulton County include Family Promise, HomeStretch, The Drake House/Drake Village, UHope CDC, and Fulton County's Homeless Division South Fulton Assessment Center.

**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.**

Fulton County and the Continuum of Care support a Housing First model that prioritizes permanent housing and offers case management and other support services. Over the next five years, the County will continue to support homeless service providers, funders, and stakeholders who recognize the need to shift focus and resources to long-term, permanent housing in order to end homelessness. The County will fund organizations that provide case management and housing navigation services to assist homeless individuals and families, including those staying in emergency shelter, make the transition to permanent housing and prevent returns to homelessness. For example, the County has funded North Fulton Community Charities, which provides funding for rapid rehousing of persons transitioning to permanent

housing. The County will also work to increase the availability of affordable housing in Fulton County by using HOME funds to support the development of new affordable rental housing.

**Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving assistance from public and private agencies that address housing, health, social services, employment, education or youth needs.**

Housing and service providers in Fulton County work together to prevent homelessness in populations who are vulnerable to or at risk of homelessness. These groups include extremely low-income individuals and families, people discharged from institutions, and those receiving assistance from agencies addressing a variety of needs, such as housing, health, social services, education or youth needs. Resources to prevent homelessness in Fulton County include:

- North Fulton Community Charities provides emergency financial assistance, thrift shop, food bank, government benefits screening, and rapid rehousing.
- The Community Assistance Center provides rental assistance, food, clothing and education resources for homelessness prevention.
- South Fulton Assessment Center provides financial assistance to low- to moderate-income individuals and families.
- LIFT Community Development Corp. provides housing and shelter referrals, life and financial skills training, food and clothing giveaways, transportation assistance, education and employment referrals, and mental health and wellness assessments.
- HOPE Atlanta (Travelers Aid) provides rental and security deposit assistance, housing search assistance, one-on-one support, and rapid rehousing, as well as emergency services, crisis intervention, transitional and permanent supportive housing for persons living with HIV/AIDS. HOPE Atlanta's Supportive Services for Veterans and their Families Program funds rapid re-housing and prevention assistance to homeless veteran households.

---

## **SP-65 LEAD BASED PAINT HAZARDS – 91.215(I)**

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

Fulton County follows HUD's Lead Safe Housing Rule requirements<sup>30</sup> in all of its federally-funded rehab, homeowner, and Housing Choice Voucher Program activities.

**How are the actions listed above related to the extent of lead poisoning and hazards?**

Following the Lead Safe Housing Rule requirements in federally-funded housing activities reduces risk of lead poisoning and hazards. The Lead Safe Housing Rule is designed to reduce hazards relating to lead-

---

<sup>30</sup> U.S. Department of Housing and Urban Development. (n.d.). *Lead Safe Housing Rule Requirements*.  
[https://www.hud.gov/program\\_offices/healthy\\_homes/enforcement/lshr\\_summary](https://www.hud.gov/program_offices/healthy_homes/enforcement/lshr_summary)

based paint in housing, which include irreversible health effects, brain and nervous system damage, reduced intelligence, and learning disabilities.<sup>31</sup> Children, pregnant women, and workers are most at risk of experiencing negative health effects resulting from exposure to lead-based paint hazards. More than 20 million homes built before 1978 contain lead-based paint hazards. For these reasons, it is vital that Fulton County reduce lead-based paint hazards in all federally-funded housing activities.

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

Fulton County integrates Lead Safe Housing Rule requirements into housing policies and procedures through:

- Certification and training requirements for inspectors;
- Lead-based paint inspections in housing rehab (subject to Final Rule for lead-based paint hazards) and Home Ownership Program (HOP) projects (using Housing Quality Standards protocol);
- Actions to eliminate lead-based paint hazards on these properties if present;
- Provision of lead-based paint hazard forms and lead hazard information pamphlets, evaluation results, and disclosure information, depending on the year the home was built, to buyers and owners participating in the Rehabilitation Emergency Assistance Grant and Home Ownership Program, and provision of a seller's certification form to the seller of the property; and
- Lead-based paint inspections of all new units available through the Housing Choice Voucher Program (Section 8) by the Housing Authority of Fulton County, using Housing Quality Standards protocol.

---

## SP-70 ANTI-POVERTY STRATEGY – 91.215(J)

### Jurisdiction Goals, Programs and Policies for Reducing the Number of Poverty-Level Families

According to the 2013-2017 American Community Survey 5-year estimates, Fulton County's poverty rate is estimated at 16.0%, slightly below the statewide poverty rate of 16.9%. The county has seen a small decrease in poverty since the 2008-2012 5-year estimates, which estimated poverty in the county at 16.8%.

The Fulton County Strategic Plan and Fulton County Comprehensive Plan detail goals for reducing poverty in Fulton County, including:

- Improve the quality, quantity, and accessibility of housing stock across the County
- Encourage a wide variety of housing types to accommodate a range of income levels for current and future residents.
- Senior housing options should expand as the population continues to grow
- Make "Aging in Place" a more achievable reality by aligning with the goals and policies of the Atlanta Regional Commission's Aging-in-Place initiative.
- Develop a sense of community and independence among seniors and intellectually and developmentally disabled (IDD) persons by providing an affordable, safe space to receive care.

---

<sup>31</sup> U.S. Department of Housing and Urban Development, Office of Lead Hazard Control. *New HUD Lead-Based Paint Regulations*. [https://www.hud.gov/sites/documents/DOC\\_12805.PDF](https://www.hud.gov/sites/documents/DOC_12805.PDF)

- Ensure that the county-wide workforce has the skills needed to meet business demand and opportunities to overcome hiring barriers.
- Expand the County's economic development impact by pursuing opportunities that link to regional economic development efforts, target areas with the greatest need, and increase return on investment.

### **How are the jurisdiction's poverty reducing goals, programs, and policies coordinated with this affordable housing plan?**

The affordable housing, workforce development, and homelessness programs detailed in this plan aim to support the achievement of the housing and economic development goals in the County's Strategic and Comprehensive plans.

To combat poverty and reduce the number of poverty-level families, the County has devoted resources to increasing access to affordable housing, including owner-occupied rehab, loans for eligible first-time homebuyers, tenant-based rental assistance, housing counseling, fair housing education and assistance, and support of the work of Community Housing Development Organizations.

Fulton County also combats poverty through funding public services programs, including youth and senior services, services to assist low-income residents, emergency assistance and homelessness prevention, case management, supportive housing, emergency shelter, meals, transportation services, and workforce development.

The County has an Office of Workforce Development designed to help in all aspects of employment, including training, job search assistance, employment fairs, youth internships, and other assistance designed to elevate job opportunities for low wage workers and those in poverty. This Plan continues to identify economic development as a goal for the CDBG program. Fulton County will continue to fund workforce development services to assist individuals in obtaining employment.

In addition to economic development programs, many homelessness programs and homeless service providers also address expanded employment opportunities as an avenue for combating poverty. LIFT Community Development Corp., for example, provides employment referrals, among other services. Programs aimed at educating youth and young adults or illiterate adults also combat poverty by developing skills that will allow residents to secure better jobs at higher wages. This plan also calls for continued support for workforce development programs and case management services that connect individuals with employment opportunities while also supporting individuals in meeting other needs, such as housing and supportive services.



---

## SP-80 MONITORING – 91.230

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

Programs and activities proposed in Fulton County's 2020-2024 Consolidated Plan and related Annual Action Plans will be carried out in part by sub-recipients of CDBG, HOME, and ESG funds with the County acting as an administrator and monitor. As in previous years, the County will carry out housing rehabilitation, and some homeownership and homeless assistance programs, directly.

The Department of Community Development has in place a complete system for monitoring its sub-recipients for all programs. In general, monitoring emphasizes evaluations of progress, performance, and compliance with applicable regulations and procedural requirements. Monitoring shall encompass compliance with applicable federal and state laws and regulations, to include but not be limited to: 24 CFR Part 570 (Entitlement Grants Regulations, OMB Circular A-87, OMB Circulars (OMB) Circular A-122, "Cost Principles for Nonprofit Organizations," and with OMB Circular A-110, "Uniform Administrative Requirements for Grants and Agreements With Universities, Hospitals and Other Nonprofit Organizations." Performance will be measured against project timetables and objectives specified in contracts or cooperation agreements executed between the County and each sub-recipient.

Monitoring activities will be carried out by the Department of Community Development (or designee), with a staff member assigned as project manager to each sub-recipient of the County's grant funds. For CDBG sub-recipients, Fulton County completes on-site monitoring of its CDBG projects at least one time per year. HOME monitoring is conducted annually to ensure that HOME funds are used in accordance with all applicable federal requirements.

Fulton County will use the following guidelines for all HOME loans both during and after the affordability period associated with the HOME assistance. For sale, transfer or foreclosure, buy downs, assumption of the first mortgage, or subordination of the HOME loan, the net proceeds will be divided proportionally as set forth herein by mathematical formula:  $A = \frac{\text{HOME recapture amount}}{\text{Direct HOME investment} + \text{homeowner investment}} \times \text{Net proceeds}$ ; Direct HOME investment,  $\frac{\text{Direct HOME investment}}{\text{Direct HOME investment} + \text{homeowner investment}} \times \text{Net proceeds} = A$ ; Homeowner investment,  $\frac{\text{Homeowner investment}}{\text{Direct HOME investment} + \text{homeowner investment}} \times \text{Net proceeds} = B$ . Additional details about the County's HOME resale and recapture provisions are available in AP-90.

For ESG, the Department of Community Development administers ESG funds through its Homeless Assessment Centers and also awards grant funds to sub-recipients to carry out eligible activities in compliance with all applicable federal regulations. HUD monitors the County on its administration of the ESG program.

# 2020 Annual Action Plan

**DRAFT**  
**August 2020**

*This page intentionally left blank.*

# EXPECTED RESOURCES

## AP-15 EXPECTED RESOURCES – 91.220(C) (1,2)

### Introduction

The table below shows the County’s grant allocations for the 2020 program year as announced by HUD, along an estimate of anticipated grant funding for the remaining four years covered by this Consolidated Plan. This estimate assumes that funding over those four years will average to be about the same as the 2020 allocations. All grant funds will be used to support the Fulton County Department of Community Development’s goals to provide decent affordable housing, a suitable living environment, and expanded economic development.

### Anticipated Resources

TABLE 57 - EXPECTED RESOURCES – PRIORITY TABLE

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	Federal	Acquisition Admin and planning Economic development Housing Public improvements Public services	\$1,867,525	To be determined	\$0	\$1,867,525	\$7,470,100	CDBG funds may be used to carry out activities related to housing rehabilitation, demolition and community revitalization, public improvements, public services, economic development, and planning.

TABLE 57 - EXPECTED RESOURCES – PRIORITY TABLE (CONTINUED)

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	Federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	\$877,448	\$0	\$0	\$877,448	\$3,509,792	HOME funds may be used for homebuyer assistance, TBRA, homeowner rehab, affordable housing development, CHDO activities, and program administration.
ESG	Federal	Conversion and rehab for transitional housing Financial assistance Overnight shelter Rapid re-housing Rental assistance services Transitional housing	\$166,641	\$0	\$0	\$166,641	\$666,564	ESG funds may be used for homeless prevention, rapid rehousing, emergency shelter and services, street outreach, HMIS, and program administration.

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

Fulton County will use federal funds to leverage additional private, state, and local funds where applicable. Fulton County funding serves as gap financing for housing development projects, which typically also include a combination of private and other public funds.

The County will comply with all HOME matching fund contribution requirements as outlined in 92.218 of the HOME regulations. These are anticipated to be satisfied through a mix of match carryover from prior years as well as other eligible sources. The County provides matching funds of twenty-five cents from the County's General Fund for each HOME dollar expended. In the Home Ownership Program, the difference between the appraised value and the sales price is acknowledged to be a donation to affordable housing and counted toward the match requirement. General fund dollars are used to cover the cost of title search examinations for the Single-Family Rehabilitation program.

Emergency Solutions Grant (ESG) match requirements will also be met using County General Funds and in-kind contributions. These funds are matched on a dollar-for-dollar basis.

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

Community Development Block Grant (CDBG) funding will be used to respond to the needs of cities within unincorporated Fulton County with low to moderate income that is at least 51% of the area and or meets of the 3 CDBG National Objectives. CDBG helps to develop viable urban communities and create transformative impact. CDBG develops strategies to bring partners and resources together to develop a number activities including but not limited to: increased development of public facilities and improvements for public purposes using existing owned properties to include parks, recreational facilities, and community centers in low- and moderate-income areas of unincorporated Fulton County. Sidewalks improvements including accessibility improvements for sidewalks and curbs, which may be installed in these areas, especially in locations with high pedestrian use such as routes commonly used by school children or people walking to public transportation and shopping, as well as sanitary sewer improvements. CDBG provides resources to fund eligible public service activities for low to moderate income beneficiaries and communities. Such public service activities include and are not limited to child care, health services, substance abuse services, fair housing counseling, education programs, energy conservation, services for senior citizens and homeless persons, welfare services (excluding income payments), and recreational services.

# ANNUAL GOALS AND OBJECTIVES

## AP-20 ANNUAL GOALS AND OBJECTIVES

### Goals Summary Information

TABLE 58 – GOALS SUMMARY

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Areas	Needs Addressed	Funding	Goal Outcome Indicator
1	Decent Housing Goal #2 – Down Payment Assistance	2020	2024	Affordable Housing	Not Applicable	Affordable Homeownership Opportunities	HOME: \$404,000	Direct financial assistance to homebuyers: 30 households assisted
2	Decent Housing Goal #3 – Homeowner Rehabilitation	2020	2024	Affordable Housing	Not Applicable	Housing Rehabilitation Assistance for Homeowners	CDBG: \$200,000 HOME: \$199,704	Homeowner housing rehabilitated: 3 housing units
3	Decent Housing Goal #4 – Rental Assistance	2020	2024	Affordable Housing	Not Applicable	Rental Assistance, Homelessness Prevention, and Rapid Rehousing	HOME: \$186,000	Tenant based rental assistance / rapid rehousing: 12 households assisted
4	Decent Housing Goal #5 – Homelessness Housing and Prevention	2020	2024	Homeless	Not Applicable	Rental Assistance, Homelessness Prevention, and Rapid Rehousing	ESG: \$124,148	Homeless person overnight shelter: 399 persons assisted  Homelessness prevention: 1,016 persons assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Areas	Needs Addressed	Funding	Goal Outcome Indicator
5	Suitable Living Environment Goal #1 – CDBG Public Services	2020	2024	Non-Housing Community Development	Not Applicable	Public Services	CDBG: \$280,128	Public service activities for low/moderate income household benefit
6	Suitable Living Environment Goal #2 – ESG Homeless Supportive Services	2020	2024	Homeless	Not Applicable	Supportive Services for Homeless Individuals and Families	ESG: \$29,995	Public service activities for low/moderate income household benefit
7	Suitable Living Environment Goal #3 – Fair Housing Education and Enforcement	2020	2024	Non-Housing Community Development	Not Applicable	Fair Housing Education and Enforcement	CDBG: \$46,668	Fair housing activities for low/moderate income household benefit
8	Suitable Living Environment Goal #4 – Facility and Infrastructure Improvements	2020	2024	Non-Housing Community Development	Not Applicable	Community Improvements	CDBG: \$885,032	Public facility, infrastructure, or other improvement activities for low/moderate income household benefit
9	Program Administration	2020	2024	Affordable Housing Homeless Non-Housing Community Development	Not Applicable	Program Administration	CDBG: \$373,505  HOME: \$87,744  ESG: \$12,498	Not applicable



# PROJECTS

## AP-35 PROJECTS – 91.220(D)

### Introduction

The projects listed below represent the activities Fulton County plans to undertake during the 2020 program year to address the goals of providing decent affordable housing, promoting a suitable living environment, and encouraging economic opportunity. The allocation of funding for the 2020 projects has been determined based on overall priority needs of county residents and community input received during the planning process.

### Projects

TABLE 59 – PROJECT LIST

#	Project Name
1	2020 Owner Occupied Housing Rehabilitation
2	2020 CDBG Public Service Activities
3	2020 Infrastructure, Public Facility, Park Improvements, and Demolition and Clearance
4	2020 Fair Housing Activities
5	2020 CDBG Program Administration
6	2020 Home Ownership Program
7	2020 Tenant-Based Rental Assistance
8	2020 HOME Program Administration
9	2020 ESG Activities

### Describe the reasons for allocation priorities and any obstacles to addressing underserved needs.

In allocating funding, Fulton County prioritized affordable housing, homelessness, public services, and community revitalization (including facility, park, and infrastructure improvements), which emerged as critical needs during the Consolidated Planning process. Fulton County does not designate specific areas for allocation of funds as part of its strategic use of HUD grant funds. Instead, the County’s programs are designed to serve eligible individuals and households throughout the County’s service area.

Obstacles to meeting underserved needs include limited funding availability, limited affordable housing development opportunities and shovel-ready projects, and increased development costs.

## AP-38 PROJECT SUMMARY

### Project Summary Information

TABLE 60 – PROJECT INFORMATION

1	Project Name	2020 Owner Occupied Housing Rehabilitation
	Target Area	Not Applicable
	Goals Supported	Decent Housing Goal #3 – Homeowner Rehabilitation
	Needs Addressed	Housing Rehabilitation Assistance for Homeowners
	Funding	CDBG: \$200,000 HOME: \$199,704
	Description	A 5-year deferred-payment loan program for eligible homeowners to hire an eligible contractor to address code violations and stabilize and preserve Fulton County’s housing stock.
	Target Date	12/31/2020
	Estimate the number and type of persons that will benefit from the proposed activity	Homeowner housing rehabilitated: 3 single-family units
	Location Description	Specific locations within the Fulton County entitlement jurisdiction to be determined during the program year
	Planned Activities	Housing rehabilitation assistance for income-eligible homeowners.
2	Project Name	2020 CDBG Public Service Activities
	Target Area	Not Applicable
	Goals Supported	Suitable Living Environment Goal #1 – CDBG Public Services
	Needs Addressed	Public Services

	<b>Funding</b>	CDBG: \$280,129
	<b>Description</b>	Services to support youth, childcare, health services, substance abuse, fair housing counseling, education programs, energy conservation, services for seniors and homeless persons, and certain welfare programs.
	<b>Target Date</b>	12/31/2020
	<b>Estimate the number and type of persons that will benefit from the proposed activity</b>	Public service activities to benefit low/moderate income residents
	<b>Location Description</b>	Specific locations within the Fulton County entitlement jurisdiction to be determined during the program year
	<b>Planned Activities</b>	Eligible public service activities.
<b>3</b>	<b>Project Name</b>	2020 Infrastructure, Public Facility, Park Improvements, and Demolition and Clearance
	<b>Target Area</b>	Not Applicable
	<b>Goals Supported</b>	Suitable Living Environment Goal #4 – Facility and Infrastructure Improvements
	<b>Needs Addressed</b>	Community Improvements
	<b>Funding</b>	CDBG: \$885,032
	<b>Description</b>	Public facility activities such as sidewalks, street lighting, pedestrian improvements, ADA improvements, community and recreation centers, and other clearance and demolition activities.
	<b>Target Date</b>	12/31/2020
	<b>Estimate the number and type of persons that will benefit from the proposed activity</b>	Public facility, infrastructure, or other activities to benefit low/moderate income residents
	<b>Location Description</b>	Specific locations within the Fulton County entitlement jurisdiction to be determined during the program year
	<b>Planned Activities</b>	Eligible public facility, infrastructure, park improvements, sanitary sewer, and demolition and clearance activities.

4	<b>Project Name</b>	2020 Fair Housing Activities
	<b>Target Area</b>	Not Applicable
	<b>Goals Supported</b>	Suitable Living Environment Goal #3 – Fair Housing Education and Enforcement
	<b>Needs Addressed</b>	Fair Housing Education and Enforcement
	<b>Funding</b>	CDBG: \$46,668
	<b>Description</b>	Fair housing education services for residents, community organizations, and housing providers. Fair housing complaint investigation services.
	<b>Target Date</b>	12/31/2020
	<b>Estimate the number and type of persons that will benefit from the proposed activity</b>	Fair housing activities to benefit low/moderate income residents
	<b>Location Description</b>	Specific locations within the Fulton County entitlement jurisdiction to be determined during the program year
	<b>Planned Activities</b>	Fair housing education and enforcement activities.
5	<b>Project Name</b>	2020 CDBG Program Administration
	<b>Target Area</b>	Not Applicable
	<b>Goals Supported</b>	Program Administration
	<b>Needs Addressed</b>	Program Administration
	<b>Funding</b>	CDBG: \$373,505
	<b>Description</b>	Program administration costs related to the overall planning and execution of CDBG-assisted community development activities, in accordance with the CDBG administrative cap. Up to 20 percent of each year's CDBG grant plus program income can be obligated for planning and administrative costs.
	<b>Target Date</b>	12/31/2020

	Estimate the number and type of persons that will benefit from the proposed activity	Not Applicable
	Location Description	Fulton County Department of Community Development, 137 Peachtree Street SW, Atlanta, Georgia 30303
	Planned Activities	Costs related to overall planning and execution of CDBG-assisted activities.
6	Project Name	2020 Home Ownership Program
	Target Area	Not Applicable
	Goals Supported	Decent Housing Goal #2 – Down Payment Assistance
	Needs Addressed	Affordable Homeownership Opportunities
	Funding	HOME: \$404,000
	Description	Loans to eligible first time homebuyers to assist with down payment costs related to eligible home purchases in Fulton County.
	Target Date	12/31/2020
	Estimate the number and type of persons that will benefit from the proposed activity	Direct financial assistance to homebuyers: 30 households assisted
	Location Description	Specific locations within the Fulton County entitlement jurisdiction to be determined during the program year
	Planned Activities	Down payment assistance to first time homebuyers.
7	Project Name	2020 Tenant-Based Rental Assistance
	Target Area	Not Applicable
	Goals Supported	Decent Housing Goal #4 – Rental Assistance
	Needs Addressed	Rental Assistance, Homelessness Prevention, and Rapid Rehousing

	<b>Funding</b>	HOME: \$186,000
	<b>Description</b>	Reimbursement to contracted partner(s) to provide tenant-based rental assistance programs for extremely low- and low-income households.
	<b>Target Date</b>	12/31/2020
	<b>Estimate the number and type of persons that will benefit from the proposed activity</b>	Tenant based rental assistance / rapid rehousing: 12 households assisted
	<b>Location Description</b>	Specific locations within the Fulton County entitlement jurisdiction to be determined during the program year
	<b>Planned Activities</b>	Tenant-based rental assistance for extremely low- and low-income households.
8	<b>Project Name</b>	2020 HOME Program Administration
	<b>Target Area</b>	Not Applicable
	<b>Goals Supported</b>	Program Administration
	<b>Needs Addressed</b>	Program Administration
	<b>Funding</b>	HOME: \$87,744
	<b>Description</b>	Program administration costs related to the overall planning and execution of HOME-assisted affordable housing activities, in accordance with the HOME administrative cap. Up to 10 percent of each year's HOME grant plus program income can be obligated for planning and administrative costs.
	<b>Target Date</b>	12/31/2020
	<b>Estimate the number and type of persons that will benefit from the proposed activity</b>	Not Applicable
	<b>Location Description</b>	Fulton County Department of Community Development, 137 Peachtree Street SW, Atlanta, Georgia 30303
	<b>Planned Activities</b>	Costs related to overall planning and execution of HOME-assisted activities.

9	<b>Project Name</b>	2020 ESG Activities
	<b>Target Area</b>	Not Applicable
	<b>Goals Supported</b>	Decent Housing Goal #5 – Homelessness Housing and Prevention Suitable Living Environment Goal #2 – ESG Homeless Supportive Services Program Administration
	<b>Needs Addressed</b>	Rental Assistance, Homelessness Prevention, and Rapid Rehousing Supportive Services for Homeless Individuals and Families Program Administration
	<b>Funding</b>	ESG: \$166,641
	<b>Description</b>	ESG funding will be used to provide emergency shelter operations and services; HMIS support; homelessness prevention / rapid rehousing; street outreach; and program administration.
	<b>Target Date</b>	12/31/2020
	<b>Estimate the number and type of persons that will benefit from the proposed activity</b>	Homeless person overnight shelter: 399 people assisted Homelessness prevention/rapid rehousing: 1,016 people assisted
	<b>Location Description</b>	Specific locations within the Fulton County entitlement jurisdiction to be determined during the program year
	<b>Planned Activities</b>	Eligible ESG activities, including emergency shelter operations and services, homelessness prevention, rapid rehousing, street outreach, HMIS support, and program administration by Fulton County Department of Community Development staff.

## AP-50 GEOGRAPHIC DISTRIBUTION – 91.220(F)

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

The Fulton County entitlement jurisdiction covers unincorporated Fulton County, as well as the cities of Alpharetta, Chattahoochee Hills, College Park, East Point, Fairburn, Hapeville, Milton, Mountain Park, Palmetto, and Union City, who executed a cooperation agreement with Fulton County during urban county requalification process. The cities of Atlanta, Roswell, and Sandy Springs do not participate with Fulton County and receive their own HUD grant allocations.

Geographically, the Fulton County entitlement jurisdiction is divided into disparate north and south portions by the cities of Atlanta, Roswell, and Sandy Springs, which lie in middle of the county. While HUD-funded activities that qualify on an area basis may be located in any income-eligible areas with the entitlement jurisdiction, all of Fulton County's low- and moderate-income census tracts are located in south Fulton County. Thus, CDBG-funded public facility and infrastructure improvements completed over the next five years will be targeted to south Fulton County, unless they serve a population that is specifically eligible for assistance (e.g., seniors, people with disabilities, victims of domestic violence).

### Rationale for the Priorities for Allocating Investments Geographically

Fulton County does not designate specific areas for allocation of funds as part of its strategic use of HUD grant funds. Instead, the County's programs are designed to serve low- and moderate-income individuals and households throughout the County's service area.

The County chooses not to designate specific geographic target areas so that it may concentrate on priority need for services and improvements based on eligibility, availability of funds, and readiness to proceed.



# AFFORDABLE HOUSING

## AP-55 AFFORDABLE HOUSING – 91.220(G)

### Introduction

During the 2020 program year, Fulton County will assist 1,460 households with housing needs. Through ESG, the County will fund emergency shelter and homelessness prevention / rapid rehousing for 1,415 people. Using HOME funds, the County anticipates providing tenant-based rental assistance for 12 households and assisting 30 homebuyers purchase homes. Using HOME and CDBG funds, the County will provide a homeowner rehabilitation program that will assist an estimated 3 single-family home owners.

**TABLE 61 - ONE YEAR GOALS FOR AFFORDABLE HOUSING BY SUPPORT REQUIREMENT**

One Year Goals for the Number of Households to be Supported	
Homeless	1,415
Non-Homeless	45
Special-Needs	0
<b>Total</b>	<b>1,460</b>

**TABLE 62 - ONE YEAR GOALS FOR AFFORDABLE HOUSING BY SUPPORT TYPE**

One Year Goals for the Number of Households Supported Through	
Rental Assistance	12
Production of New Units	0
Rehab of Existing Units	3
Acquisition of Existing Units	30
<b>Total</b>	<b>45</b>

## AP-60 PUBLIC HOUSING – 91.220(H)

### Introduction

Public housing in Fulton County is operated by the Housing Authority of Fulton County (HAFC). As of 2019, the HAFC operates 2,272 total units, of which 947 utilize housing choice vouchers, 132 are LIHTC units, 190 are project-based vouchers/RAD and 1,003 are port vouchers.<sup>32</sup> The Housing Authority of the City of

<sup>32</sup> Housing Authority of Fulton County. "FY 2019 Annual Plan." <https://www.hafc.org/FY2019%20Annual%20Plan.pdf>. p. 1.

East Point (EPHA) currently has 280 units of traditional public housing, as well as 555 housing choice voucher units.

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

The HAFC has converted all public housing units in its portfolio to other forms of publicly-supported housing. The EPHA is anticipated to complete 180 units of senior housing by the summer of 2020. The new EPHA development will be called the Hillcrest Active Adult Community.

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

Housing authority participants in Fulton County have several opportunities to receive assistance with the home buying process. The HAFC is a HUD Certified Housing Counseling Center, which offers Homebuyer Education Workshops to prepare residents to become first-time homebuyers. There are also 24 HAFC housing choice voucher participants in the Neighborhood Assistance Corporation of America (NACA) home buying program. Both the HAFC and EPHA offer the Family Self-Sufficiency Program – a 5-year program which provides tenants with an individual training and services plan to help the family prepare to transition out of publicly-supported housing.

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

Not applicable – None of the housing authorities in Fulton County are designated as “troubled.”

---

**AP-65 HOMELESS AND OTHER SPECIAL NEEDS ACTIVITIES – 91.220(I)**

**Introduction**

Fulton County is covered by the Fulton County Continuum of Care, a network of service providers covering Fulton County (not including the City of Atlanta). The Fulton County Continuum of Care brings together housing and service providers to meet the needs of homeless individuals and families. Fulton County is in the process of developing a Homeless Plan that will seek to align existing planning efforts related to homelessness to foster a more consistent approach to homelessness and affordable / low-cost housing.

**Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including:**

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

Over the next year, the CoC and other homeless housing and service providers in Fulton County will continue reaching out to homeless persons, including unsheltered persons, through emergency shelter, meals, transportation, counseling, and case management. One of the objectives of Fulton County’s draft

Homeless Plan is to prioritize unsheltered and vulnerable households, with strategies that include training and support for service providers and integrated services with behavioral health and healthcare systems.

## **2. Addressing the emergency shelter and transitional housing needs of homeless persons.**

During the 2020 program year, Fulton County will use ESG funds to fund emergency shelter and transitional housing providers, possibly to include:

- Travelers Aid dba HOPE Atlanta, which provides emergency assistance and supportive housing.
- North Fulton Community Charities, which provides rapid rehousing.
- Hope through Soap, which provides outreach.
- South Fulton Assessment Center, which provides financial assistance for shelter, homeless prevention, and rapid rehousing.

## **3. 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.**

During the 2020 program year, Fulton County will fund organizations that provide case management and housing navigation services to assist homeless individuals and families, including those staying in emergency shelter, make the transition to permanent housing and prevent returns to homelessness. Specifically, the County will fund rapid rehousing, case management, legal representation and counseling, emergency financial assistance, and rental assistance. The County will also work to increase the availability of affordable housing in Fulton County by using HOME funds to support the development of new affordable rental housing.

A key objective of the County's draft Homeless Plan is to increase the inventory of diversion, rapid rehousing, and permanent supportive housing, so as to successfully divert or quickly rehouse all eligible households.

## **4. 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.**

Over the next year, housing and service providers in Fulton County will continue to work together to prevent homelessness in populations who are vulnerable to or at risk of homelessness. Organizations and resources to prevent homelessness that will be in place during the 2020 program year in Fulton County include:

- North Fulton Community Charities provides emergency financial assistance, thrift shop, food bank, government benefits screening, and rapid rehousing.
- The Community Assistance Center provides rental assistance, food, clothing and education resources for homelessness prevention.
- LIFT Community Development Corp. provides housing and shelter referrals, life and financial skills training, food and clothing giveaways, transportation assistance, education and employment referrals, and mental health and wellness assessments.
- HOPE Atlanta (Travelers Aid) provides rental and security deposit assistance, housing search assistance, one-on-one support, and rapid rehousing, as well as emergency services, crisis intervention, transitional and permanent supportive housing for persons living with HIV/AIDS. HOPE Atlanta's Supportive Services for Veterans and their Families Program funds rapid re-housing and prevention assistance to homeless veteran households.

---

## **AP-75 BARRIERS TO AFFORDABLE HOUSING – 91.220(J)**

**Actions 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.**

In January 2019, the Fulton County Board of Commissioners passed a resolution urging municipalities in Fulton County to implement affordable housing policies. The resolution allows the Development Authority of Fulton County to apply local affordable housing ordinances to any multi-family projects completed through the Development Authority.<sup>33,34</sup>

---

## **AP-85 OTHER ACTIONS – 91.220(K)**

### **Introduction**

This section details Fulton County's actions planned to ensure safe and affordable housing for its residents, along with plans to meet underserved needs, reduce poverty, develop institutional structure, and enhance coordination between public and private sector housing and community development agencies.

### **Actions Planned to Address Obstacles to Meeting Underserved Needs**

To help remove obstacles to meeting underserved needs and improve service delivery, Fulton County supports the continued development of the Fulton County Continuum of Care, a collaborative to

---

<sup>33</sup> Fulton County Board of Commissioners. "Recess Meeting – January 23, 2019"

<https://agendaminutes.fultoncountyga.gov/sirepub/mtgviewer.aspx?meetid=14181&doctype=MINUTES>.

<sup>34</sup> Fulton County Board of Commissioners. "A Resolution Urging the Municipalities Located Within Fulton County, Georgia to Adopt and Implement Policies and Initiatives in Support of Affordable Housing; and for Other Purposes."

<https://agendaminutes.fultoncountyga.gov/sirepub/cache/2/fbu5e4h2pn4phuitpwwgjiyol/49528112122019063037839.PDF>

coordinate the work of social service organizations, disseminate news and information, eliminate duplication of effort, and spearhead community-wide solutions to local needs. Fulton County will provide funding for the following to address underserved needs:

### *Homelessness Prevention and Services*

- Case management, emergency financial assistance to prevent homelessness, and rapid rehousing

### *Emergency Shelter and Transitional/ Supportive Housing*

- Transitional and emergency shelter
- Case management and supportive housing
- Supportive housing for victims of domestic violence

### *Fair Housing*

- Fair housing education and enforcement
- Legal Representation and counseling to low income households

### **Actions Planned to Foster and Maintain Affordable Housing**

Fulton County will continue to offer their core programs – including home purchase assistance, housing rehabilitation assistance, and tenant-based rental assistance – in order to foster housing affordability. HOME funds will also be used to support the development of new affordable housing, including multifamily rental developments. The County will continue to use HOME funds to support development of affordable housing by a local CHDO.

In addition to specific programs designed to foster and maintain affordable housing, the County will encourage participating jurisdictions to review their zoning ordinances for prospective barriers to affordable housing development, and to make amendments as needed. The County is currently in the process of developing an updated Analysis of Impediments to Fair Housing Choice in cooperation with the City of Atlanta. As a result of this study, Fulton County and the City of Atlanta may undertake additional approaches to foster fair and affordable housing.

### **Actions Planned to Reduce Lead-Based Paint Hazards**

Over the next year, Fulton County will continue to conduct lead-based paint inspections and, if a hazard is found, remediation. These actions will both reduce lead exposure risk and help to maintain the county's older, lower and moderately priced housing. Any housing rehabilitation activities conducted using HOME and CDBG funds will continue to be monitored closely for any potential lead exposure.

### **Actions Planned to Reduce the Number of Poverty-Level Families**

Over the 2020 program year, Fulton County will continue its workforce development programs through WorkSource Fulton to connect individuals with job skills and employment. Homeless service providers will continue to offer job search and resume assistance. A focus on improving the jobs/housing balance in

existing and emerging job centers in Fulton County will aim to help poverty-level families access more employment opportunities, while potentially lowering transportation and housing costs.

### **Actions Planned to Develop Institutional Structure**

Fulton County has developed a robust administrative structure to manage its CDBG, HOME, and ESG funds. The County's Department of Community Development offers technical assistance sessions for potential subrecipients, CHDOs, and contractors to learn how to effectively administer funding from the CDBG and HOME programs. In addition to working with organizations, the County's citizen participation process is designed to keep constituents abreast of funding plans and make engaged and informed citizens another vital part of the institutional structure.

### **Actions Planned to Enhance Coordination between Public and Private Housing and Social Service Agencies**

Fulton County will continue to be an active participant in the Fulton County Continuum of Care. The CoC promotes community-wide commitment to goals of ending homelessness; quickly re-housing homeless individuals and families; effective utilization of mainstream resources; optimizing consumer self-sufficiency. Membership includes emergency, transitional, and permanent housing providers; nonprofit social service organizations, and government agencies.

# PROGRAM SPECIFIC REQUIREMENTS

## AP-90 PROGRAM SPECIFIC REQUIREMENTS – 91.220(L) (1,2,4)

### Introduction

Following is a description of the program-specific requirements under the Community Development Block Grant (CDBG), Home Investment Partnerships (HOME), and Emergency Solutions Grant (ESG) programs.

As a result of both federal mandate and local policy, each of the County’s entitlement programs requires or encourages some level of “match” or “leveraging” – financing from other sources in addition to the requested entitlement funds. Locally-adopted policies for the HOME program require that 25% of project costs be accounted for by matching funds. In addition, the County’s CDBG process awards higher points to project proposals that leverage additional resources. Under the ESG program, federal regulations require that there be a dollar-for-dollar match from other public or private sources.

### Community Development Block Grant Program (CDBG) (Reference 24 CFR 91.220(l)(1))

Projects planned with all CDBG funds expected to be available 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.

1. 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	TBD
2. 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
3. The amount of surplus funds from urban renewal settlements	\$0
4. 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
5. The amount of income from float-funded activities	\$0
<b>Total Program Income</b>	<b>TBD</b>

## Other CDBG Requirements

1. The amount of urgent need activities. Note that Fulton County is exploring options to use CDBG funding to assist with response to the COVID-19 pandemic according to HUD guidelines.	\$0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall benefit – A consecutive period of one, two, or three years may be used to determine that a minimum of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	90%

## HOME Investment Partnership Program (HOME) Reference 24 CFR 91.220(I)(2)

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

Fulton County does not anticipate investing HOME funds in other forms than described in 24 CFR Section 92.205(b) of the HOME Investment Partnerships Final Rule regulations effective October 1, 1996 and as subsequently amended. The County will notify HUD as appropriate if any changes are proposed and follow the applicable substantial amendment process as outlined in the County's Citizen Participation Plan.

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

Fulton County's Home Owner Program (HOP) provides direct assistance to homebuyers towards the purchase price of a home. Currently, this provision is secured and enforced through a mortgage deed and a note. The mortgage deed is filed for recordation with the Fulton County Clerk of Superior Courts, and these requirements place a lien on the property that should trigger any action related to the sale, transfer, assumption or foreclosure of the HOME-assisted property. The mortgage and note clearly define the dollar amounts and the loan terms; contain default provisions and stipulation that the Borrower is responsible for maintaining the home in good repair.

If conditions of the note are met, the principal balance will be reduced by 20% each year beginning after the first year of occupancy, for the duration of the loan. If there is an occurrence of default, the outstanding principal balance becomes due and payable. These funds will be remitted to Fulton County and will be utilized for HOME-eligible activities only. The applicant(s) must occupy the property as his/her primary residence for the period of affordability as set forth by the loan amount. The HOP loan agreement is signed by the homebuyer at the time of financing to ensure that the homebuyer is committed to this obligation. The borrower is also required to sign the acknowledgement of rights form certifying that they understand certain program restrictions.

The policy of Fulton County for the recapture of HOME investments in cases where the borrower does not occupy the house for the full term of the affordability period 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. Fulton County has selected option number three, shared net proceeds, as set forth in paragraph 92.254(a)(5)(ii)(A)(3) of the program regulations. Net proceeds means the sales price minus the first loan repayment, standard real estate commissions, if any, real estate taxes and closing costs. If the net proceeds are not sufficient to recapture the full amount of the investment plus enable the homeowner to recover the amount of the homeowner's down payment and any capital improvement investment made by the homeowner since purchase, the County must share the net proceeds with the homeowner.

Fulton County's policy of proportional return of investment is to encourage the purchaser to participate in the program and provides a fair return to both the purchaser and Fulton County at the time of the sale. Because it is impossible to dictate the sales market condition at the time of the actual sale, Fulton County has elected to set the following policy: The net proceeds will be divided proportionally as set forth herein by mathematical formula:  $A = \frac{\text{HOME Recapture amount}}{\text{Direct HOME investment} + \text{homeowner investment}} \times \text{Net proceeds}$ ;  $B = \frac{\text{Amount to homeowner}}{\text{Direct HOME investment} + \text{homeowner investment}} \times \text{Net proceeds}$ . The Home Investment is the amount of funds that the owners made for improvements to the property over time. If there are no net proceeds, repayment of the note is not required. In the event the net proceeds exceed the amount necessary to repay both the homeowner's investment, the excess proceeds will be paid to the homeowner.

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

Fulton County's HOME program has adopted the use of the recapture provision to achieve the goal of continued affordability and annually certifies that the homeowner maintains the assisted unit as their primary resident. The County annually sends a Homebuyer Certification document to each HOP second mortgage beneficiary (currently in the affordability period) terms of the second mortgage loan to include existing primary residency requirement. Recipients are requested to verify receipt of the certification document by including the respective borrower's signature and date of the document, then return to the signature and date of the document, then return to the County via facsimile or U.S. Post Master. To ensure that the home buyer certification documents are sent and not forwarded to any other address the County uses a stamp stating the following: "Return Service Requested Do Not Forward."

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

Refinancing is not an eligible activity under any federally-funded HOME programs. Therefore, Fulton County does not plan to use HOME funds to refinance existing debt and has not established refinancing policy guidelines for the use of HOME funds.

**Emergency Solutions Grant (ESG) Reference 91.220(I)(4)****1. Include written standards for providing ESG assistance (may include as attachment)**

Fulton County enthusiastically supports and partners with the GA 502 Fulton County CoC approach to addressing the needs of people who are homeless or at risk of becoming homeless. Our shared vision and commitment are focused on rooting out the causes of homelessness and aiding individuals and families in their successful reintegration into the community. Fulton County and the GA 502 Fulton County CoC work collaboratively to identify and serve the chronically homeless, youth, families, and veterans through the GA 502 Coordinated Intake and Assessment System (CIAS). The staff of the Fulton County's Homeless Division provides administrative support to the GA 502 Board of Directors. Utilizing ESG and other jurisdictional allocations coupled with the CoC Supportive Housing Program grant funds, the planning committee formulates the plan to implement strategies to address the 7 performance measures targeting the groups identified above and measures, using HMIS performance data, the impact of the strategies on the intended population. Fulton County's ESG written standards are included as an attachment to this plan.

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

The Coordinated Intake and Assessment System (CIAS) is designed to complete outreach and recruit homeless individuals and families throughout the geographic area of Fulton County, to assess their individual needs and facilitate access to services in response to those identified needs. CIAS utilizes a multi-tiered approach which requires for the operation of an Assessment Center centrally located in both the south and north areas of Fulton County. To satisfy eligibility criteria for participation in the Emergency Solutions Grant program, applicants must be below 30% AMI, according to the current HUD income limits (for homelessness prevention assistance), or homeless or at risk of becoming homeless (for rapid re-housing assistance), and lacking sufficient resources and support networks necessary to retain housing without ESG assistance. All ESG participants receive an initial consultation to determine eligibility and assistance.

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

In accordance with HUD 24 CFR 576.3 (Allocation of Funding), regulations mandate that 7.5% of funds should be spent on administrative activities, a maximum of 60% of Fulton County's ESG funds are to be spent on shelter activities, and the remaining 40% are to be spent on homeless prevention and rapid rehousing activities proposed by organizations. Fulton County makes sub-awards in collaboration and consultation with the GA 502 Continuum of Care. The ESG written standards attached to this plan outline the County's process for allocating ESG funds.

**4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with**

**homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.**

Not applicable. Fulton County successfully meets the homeless participation requirements.

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

ESG performance standards are upheld through review of monthly or quarterly reports determined by the designated ESG Project Manager depending on the project or service to the County. It is imperative that the reports are submitted as scheduled. The County is responsible for reporting program accomplishments to HUD, who in turn submits the information in congressional reports. Each Project Manager responsible for technical support of the subrecipient will provide reporting formats prior to commencement of the ESG-funded project or service. Project Manager(s) will visit the site of each project or service delivery location no less than annually to assess progress. Additional site visits may be required depending on the subrecipient's need for technical support. Each ESG subrecipient must keep records of fund expenditures; a copy of the ESG contract executed with Fulton County; and all other project or service information important to the administration of the project for a minimum of four (4) years. The County will monitor ESG subrecipient files and record keeping procedures at least annually. Each agency receives notification in writing prior to the anticipated monitoring date. The HMIS database is also reviewed to review performance.

1   **A RESOLUTION AUTHORIZING AN AMENDMENT TO THE FULTON COUNTY 2020**  
2   **– 2024 CONSOLIDATED PLAN FOR FEDERAL COMMUNITY DEVELOPMENT**  
3   **BLOCK GRANT (CDBG), HOME INVESTMENT PARTNERSHIP GRANT (HOME),**  
4   **AND EMERGENCY SOLUTIONS GRANT (ESG) PROGRAMS AND ANNUAL**  
5   **ACTION PLAN; AUTHORIZING THE CHAIRMAN TO DISBURSE FUNDS AND**  
6   **EXECUTE AND ADMINISTER ALL DOCUMENTS CONSISTENT WITH THESE**  
7   **FEDERAL PROGRAMS; AND FOR RELATED OTHER PURPOSES.**

8       **WHEREAS**, the provision of services to address the needs of low- and moderate-  
9   income residents of Fulton County, Georgia is a vital activity necessary to the  
10   maintenance of continued growth and development to both Fulton County and the  
11   region; and

12       **WHEREAS**, Fulton County maintains an active partnership with the U.S.  
13   Department of Housing and Urban Development to promote development and provide  
14   services to address the needs of low- and moderate-income citizens through the  
15   Community Development Block Grant (CDBG), HOME Investment Partnerships  
16   (HOME), and the Emergency Solutions Grant (ESG) Programs and their amendments;  
17   and

18       **WHEREAS**, U.S. Department of Housing and Urban Development regulations  
19   require that entitlement jurisdictions, such as Fulton County, establish a Consolidated  
20   Plan every five (5) years to analyze the needs of Fulton County's low- and moderate-  
21   income residents; and

22       **WHEREAS**, U.S. Department of Housing and Urban Development regulations  
23   further require that entitlement jurisdictions submit an Annual Action Plan to document  
24   the projects and services to be provided with CDBG, HOME, and ESG funds throughout  
25   its jurisdiction; and

26       **WHEREAS**, the Fulton County Board of Commissioners approved the Fulton  
27   County 2020-2024 Consolidated Plan and 2020 Action Plan on July 8, 2020 (Item # 20-  
28   0478); and

29       **WHEREAS**, as directed by the April 10, 2020 memo from the U.S. Department of  
30   Housing and Urban Development ("Availability of Waivers and Suspensions of the  
31   HOME Program Requirements in Response to COVID-19 Pandemic"), on August 4,  
32   2020, the Fulton County Department of Community Development submitted a request to  
33   the U.S. Department of Housing and Urban Development to waive the 2020 mandatory  
34   15% (\$131,617) Community Housing Development Organizations (CHDOs) HOME set-  
35   aside that was included in the July 8, 2020, Fulton County Board of Commissioners'  
36   approved 2020-2024 Consolidated Plan and 2020 Action Plan; and

37       **WHEREAS**, the Fulton County Board of Commissioners finds that it is in the best  
38   interest of the citizens of Fulton County, Georgia to amend the proposed 2020-2024

Consolidated Plan, attached hereto and incorporated by reference, and amend the Proposed 2020 Annual Action Plan, attached hereto and incorporated by reference, to include the waiver granted by the U.S. Department of Housing and Urban Development; and

**NOW, THEREFORE, BE IT RESOLVED**, that the Fulton County Board of Commissioners hereby approves and authorizes an amendment to the Fulton County 2020-2024 Consolidated Plan and 2020 Action Plan to include the waiver granted by the U.S. Department of Housing and Urban Development and directs the application of all funds secured by the submittal of activities in the amendment documents to benefit low- and moderate-income residents of Fulton County, as directed by the Board of Commissioners and U.S. Department of Housing and Urban Development.

**BE IT FURTHER RESOLVED**, that the Chairman of the Fulton County Board of Commissioners is hereby authorized to disburse all CDBG, HOME, and ESG funds for the purposes of implementing said projects and to execute on behalf of Fulton County all necessary intergovernmental agreements, contracts, and related documents or papers, as necessary and consistent with these programs, program amendments and this Resolution.

**BE IT FINALLY RESOLVED**, that this Resolution shall become effective upon its adoption, and that all prior actions inconsistent with this Resolution and parts of resolutions in conflict with this Resolution are hereby repealed to the extent of the conflict.

**SO PASSED AND ADOPTED**, this \_\_\_\_\_ day of \_\_\_\_\_, 2020.

**FULTON COUNTY BOARD OF COMMISSIONERS**

\_\_\_\_\_  
Robert L. Pitts, Chairman

**ATTEST:**

\_\_\_\_\_  
Tonya R. Grier  
Interim Clerk to the Commission

**APPROVED AS TO FORM:**

\_\_\_\_\_  
Patrise Perkins-Hooker  
County Attorney

P:\CALegislation\10.7.20Resolution to amend 2020-2024 Consolidated Plan and 2020 Annual Action Plan.doc



**U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT**  
WASHINGTON, DC 20410-7000

OFFICE OF THE ASSISTANT SECRETARY FOR  
COMMUNITY PLANNING AND DEVELOPMENT

April 10, 2020

**MEMORANDUM FOR:** All Community Planning and Development Field Office Directors,  
Deputy Directors, and Program Managers

**FROM:** John Gibbs, Acting Assistant Secretary for Community Planning  
and Development (D)

**SUBJECT:** Availability of Waivers and Suspensions of the HOME Program  
Requirements in Response to COVID -19 Pandemic

This memorandum provides guidance and the necessary statutory suspensions and regulatory waivers to enable HOME participating jurisdictions (PJs) affected by the Coronavirus Disease 2019 (COVID-19) pandemic to use HOME funds to address immediate housing needs and to help prevent spread of the virus. The memorandum is divided into two sections. Section I addresses PJs located in areas covered by a major disaster declaration made under Title IV of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act). Section II describes regulatory waivers available to all HOME PJs, not just those included in a major disaster declaration. Provisions that are not specifically suspended or waived remain in full effect.

CPD Field Offices shall inform PJs of the availability of these suspensions and waivers. A PJ that intends to implement the HOME statutory suspensions and/or regulatory waivers identified below, must send written notification via e-mail to the CPD Division in its local HUD Field Office before it implements the waiver or suspension. This written notification must identify which suspensions and/or waivers the PJ plans to use.

### **Waiver and Suspension Authority**

Section 290 of the Cranston-Gonzalez National Affordable Housing Act of 1990 (NAHA), as amended, authorizes HUD to suspend HOME statutory requirements to assist PJs in addressing the damage in an area for which the President has issued a major disaster declaration under Title IV of the Stafford Act and to assist them in disaster recovery.

Upon determination of good cause, in accordance with 24 CFR 5.110, HUD may waive regulatory provisions subject to statutory limitations. These provisions provide HUD the authority to make waiver determinations for the HOME program.

### **I. Statutory Suspensions and Regulatory Waivers Available Only to Major Disaster Areas**

Pursuant to the authority provided in Section 290 of NAHA and 24 CFR 5.110, I hereby find good cause, as stated in the justifications that follow, to suspend the statutory provisions and waive the related regulatory provisions described below for PJs covered by a major disaster declaration under Title IV of the Stafford Act as a result of the COVID-19 pandemic. These suspensions and waivers are also available to any PJ that receives a major disaster declaration related to the COVID-

19 pandemic after the date of this memorandum. These suspensions and waivers are intended to provide maximum administrative flexibility to PJs and better assist low-and very low-income households as they deal with the effects of the COVID-19 pandemic.

1. 10% Administration and Planning Cap

- Requirement: Limitation on the Use of HOME Funds for Administrative Costs
- Citations: Section 212(c) of NAHA and 24 CFR 92.207
- Explanation: These provisions limit the amount of HOME funds that a PJ may use for administrative and planning costs associated with its HOME award. A PJ may expend up to 10 percent of its annual HOME allocation, plus any program income received, for administrative and planning costs. These provisions are suspended to enable the PJ to expend up to 25 percent of its FY 2019 and FY 2020 allocations and program income received for administrative and planning costs.
- Justification: This suspension is required to provide the PJ adequate funds to pay for the increased cost of administering HOME-related activities to address the effects of COVID-19, including attempts to prevent the spread of the virus. The suspension is also intended to relieve the PJ of the burden of identifying other general funds to pay HOME administrative and planning costs at a time when the State and local tax revenues that provide general operating revenue are decreasing.
- Applicability: This suspension and waiver applies to the FY 2019 and FY 2020 HOME allocations of PJs that are covered by a major disaster declaration.

2. CHDO Set-aside Requirement

- Requirement: Set-aside for Community Housing Development Organizations (CHDOs)
- Citations: Section 231 of NAHA and 24 CFR 92.300(a)(1)
- Explanation: These provisions establish a set-aside for CHDOs. The PJ must use 15 percent of each annual allocation of HOME funds only for housing owned, developed, or sponsored by CHDOs.
- Justification: The suspension and waiver are required to relieve the PJ of requirements that may impede the obligation and use of funds to expeditiously assist families affected by the COVID-19 pandemic. Suspension of the CHDO set-aside will immediately make additional HOME funds available for activities such as tenant-based rental assistance for which CHDO set-aside funds cannot be used.



Applicability: The CHDO set-aside requirement is reduced to zero percent for the fiscal year 2017, 2018, 2019, and 2020 allocations of State and local PJs.

3. Limits and Conditions on CHDO Operating Expense Assistance

Requirement: Operating Assistance for Community Housing Development Organizations (CHDOs)

Citations: Section 212(g) and 234(b) of NAHA; 24 CFR 92.208 and 24 CFR 92.300(e) and (f)

Explanation: Section 212(g) of NAHA and 24 CFR 92.208 limit the amount of CHDO operating assistance that a PJ may provide to 5% of each annual HOME allocation. Section 234(b) of NAHA and 24 CFR 92.300(f) limit the amount of CHDO operating assistance, in combination with certain other forms of assistance, that each CHDO may receive to the greater of 50% of its annual operating budget or \$50,000. 24 CFR 92.300(e) requires a CHDO receiving operating assistance that is not currently receiving CHDO set-aside funding for a specific project to be expected to receive such funding within 24 months.

These statutory provisions are suspended and regulatory provisions are waived to permit a PJ to provide up to 10% of its FY 2019 and FY 2020 HOME allocations as operating assistance to CHDOs and to permit a CHDO to receive funding to fill operating budget shortfalls, even if the amount exceeds the higher of \$50,000 or 50% of its annual operating budget. Furthermore, PJs will not be required to include a provision in the written agreement with the CHDO that the CHDO is expected to receive CHDO set-aside funds within 24 months of receiving the additional operating assistance, as required in 24 CFR 92.300(e).

Justification: The suspension and waiver of these requirements is required to ensure that CHDOs are able to maintain operations and retain staff capacity to own, develop and sponsor housing with CHDO set-aside funds to serve communities impacted by the COVID-19 pandemic.

Applicability: PJs in areas covered by a major disaster declaration may use up to 10% of their FY 2019 and FY 2020 allocations for CHDO operating assistance. A CHDO receiving increased operating assistance must use the assistance to maintain organizational capacity during the COVID-19 pandemic. CHDOs may receive increased operating assistance under these suspensions and waivers through June 30, 2021.

4. Matching Contribution Requirements

Requirement: Reduction of Matching Contributions

Citation: 24 CFR 92.218 and 92.222(b)

Explanation: The provisions of 24 CFR 92.218 and 24 CFR 92.222(b) require all HOME PJs to contribute throughout the fiscal year to housing that qualifies as affordable housing under the HOME program. The contributions must total no less than 25 percent of the HOME funds drawn from the PJ's HOME Investment Trust Fund Treasury account. The COVID-19 pandemic has drastically reduced economic activity, reducing state and local tax revenues and placing financial strain on PJs as they deliver urgently needed public health, emergency housing, education, community and social services. Reducing the matching requirement for PJs in areas covered by a major disaster declaration by 100 percent for FY 2020 and FY 2021 will ease the economic burden on PJs and eliminate the need for them to identify other sources of match for HOME activities.

Justification: Given the urgent housing and economic needs created by COVID-19, and the substantial financial impact the PJ will face in addressing those needs, waiver of these regulations will relieve the PJ from the need to identify and provide matching contributions to HOME projects.

Applicability: This match reduction applies to funds expended by a PJ located in Presidentially declared-disaster area between October 1, 2019 and September 30, 2021.

**II. Regulatory Waivers Available to All Participating Jurisdictions**

The following regulatory waivers are available to all PJs, not just those PJs covered by a major disaster declaration under Title IV of the Stafford Act. Pursuant to the authority provided in 24 CFR 5.110, I hereby waive the HOME regulatory requirements specified below for all HOME PJs.

1. Citizen Participation Reasonable Notice and Opportunity to Comment

Citation: 24 CFR 91.105(c)(2) and (k) (Local governments), 24 CFR 91.115(c)(2) and (i) (States), and, 24 CFR 91.235(e) (Insular areas) 24 CFR 91.401 (Consortia)

Explanation: The regulations at 24 CFR 91.105(c)(2) and (k) (Local governments), 24 CFR 91.115(c)(2) and (i) (States), 24 CFR 91.235(e) (Insular Areas), and 24 CFR 91.401 (Consortia) set forth the citizen participation requirements for PJs. For substantial amendments to the consolidated plan, the regulations require the PJ to follow its citizen participation plan to provide citizens with reasonable notice and opportunity to comment. The citizen participation

plan must state how reasonable notice and opportunity to comment will be given. This waiver will permit PJs amending their plans as a result of the COVID-19 pandemic to reduce the comment period to 5 days.

**Justification:** Given the unprecedented economic disruptions caused by the COVID-19 pandemic, PJs may need to expeditiously reprogram HOME funds to activities that more directly meet their immediate housing needs, including reprogramming funds to cover increased administrative costs or away from other development activities. Requiring these PJs to complete the required public comment period would cause undue delays in the face of urgent and growing need. PJs must have the ability to respond immediately to the unprecedented housing need caused by the COVID-19 pandemic.

**Applicability:** This waiver is in effect for any necessary substantial amendments to FY 2020 and earlier consolidated plans or action plans.

## 2. Income Documentation

**Requirement:** Source Documentation for Income Determinations

**Citations:** 24 CFR 92.203(a)(1) and (2), 24 CFR 92.64(a) (Insular Areas)

**Explanation:** These sections of the HOME regulation require initial income determinations for HOME beneficiaries by examining source documents covering the most recent two months. 24 CFR 92.64(a) applies these requirements to Insular Areas.

**Justification:** This waiver permits the PJ to use self-certification of income, as provided at §92.203(a)(1)(ii), in lieu of source documentation to determine eligibility for HOME assistance of persons requiring emergency assistance related to COVID-19. Many families affected by actions taken to reduce the spread of COVID-19, such as business closures resulting in loss of employment or lay-offs, will not have documentation that accurately reflects current income and will not be able to qualify for HOME assistance if the requirement remains effective.

**Applicability:** The waiver applies to individuals and families that have lost employment or income either permanently or temporarily due to the COVID-19 pandemic and who are applying for admission to a HOME rental unit or a HOME tenant-based rental assistance program. This waiver also applies to homeless individuals and families who are applying for admission to a HOME rental unit or a HOME tenant-based rental assistance program. Timely provision of this assistance will reduce the spread of COVID-19.

If a PJ chooses to use this waiver availability, the PJ must ensure that self-certified income takes into consideration all income, including any

unemployment and emergency benefits the applicant will receive. However, for purposes of an applicant's self-certification, emergency tax relief (commonly referred to as stimulus payments) is not to be included as an emergency benefit. Also, the PJ must arrange to conduct on-site rent and income reviews within 90 days after the waiver period. The PJ must include tenant income certifications in each project file. This waiver remains in effect through December 31, 2020.

3. On-Site Inspections of HOME-assisted Rental Housing

- Requirement: Ongoing Periodic Inspections of HOME-assisted Rental Housing
- Citation: 24 CFR 92.504(d)(1)(ii) and 24 CFR 92.64(a) (Insular Areas)
- Explanation: These provisions require that during the period of affordability PJs perform on-site inspections of HOME-assisted rental housing to determine compliance with the property standards at §92.251 and to verify the information submitted by the owners in accordance with the income and rent requirements of §92.252. On-site inspections must occur at least once every three years during the period of affordability. 24 CFR 92.64(a) applies these requirements to Insular Areas.
- Justification: Waiving the requirement to perform ongoing on-site inspections will help protect PJ staff and limit the spread of COVID-19. To protect PJ staff and reduce the spread of COVID-19, this waiver extends the timeframe for PJs to perform on-going periodic inspections and on-site reviews to determine a HOME rental project's compliance with property standards and rent and income requirements.
- Applicability: The waiver is applicable to ongoing periodic inspections and does not waive the requirement to perform initial inspections of rental properties upon completion of construction or rehabilitation. Within 120 days of the end of this waiver period, PJs must physically inspect units that would have been subject to on-going inspections during the waiver period. The waiver is also applicable to on-site reviews to determine a HOME rental project's compliance with rent and income requirements if the project owner is unable to make documentation available electronically. The waiver is in effect through December 31, 2020

4. Annual Inspection of Units Occupied by Recipients of HOME Tenant-Based Rental Assistance (TBRA)

- Requirement: Annual Inspections of TBRA Units

- Citation: 24 CFR 92.504(d)(1)(iii); 24 CFR 92.209(i) requirement for annual re-inspections and 24 CFR 92.64(a) (Insular Areas)
- Explanation: These provisions require PJs to annually inspect each unit occupied by a recipient of HOME TBRA. 24 CFR 92.64(a) applies these requirements to Insular Areas.
- Justification: Waiving the requirement that these annual inspections be performed according to schedule will protect the health of both inspectors and TBRA tenants by observing physical distancing recommendations to limit the spread of COVID-19.
- Applicability: The waiver is applicable to annual HQS inspections required to occur from the date of this memorandum through December 31, 2020. At the end of this waiver period, PJs must inspect units that would have been subject to HQS inspections during the waiver period within 120 days of the expiration of the waiver. In addition, PJs shall make reasonable efforts to address any tenant-reported health and safety issues during the waiver period.

#### 5. Four-Year Project Completion Requirement

- Requirement: Four-Year Project Completion Deadline
- Citation: 24 CFR 92.205(e)(2) and 24 CFR 92.64(a) (Insular Areas)
- Explanation: The provision requires that projects assisted with HOME funds be completed within 4 years of the date that HOME funds were committed. If the project is not complete, in accordance with the definition of “project completion” at 24 CFR 92.2, by the deadline, the project is involuntarily terminated in HUD’s Integrated Data Information System (IDIS), and the PJ must repay all funds invested in the project. The regulations permit a PJ to request an extension of the deadline for up to one-year. 24 CFR 92.64(a) applies these requirements to Insular Areas.
- Justification: This waiver is necessary to provide additional time to permit completion of HOME-assisted projects that may be delayed as a result of the impact of COVID-19 on project timelines. These delays may occur as a result of worker illnesses or efforts to reduce the spread of COVID-19, such as smaller construction crews or delays in local permitting or inspections due to government office closures.
- Applicability: This waiver applies to projects for which the 4-year project completion deadline will occur on or after the date of this memorandum. The completion deadlines for covered projects are extended to December 31, 2020.

6. Nine-Month Deadline for Sale of Homebuyer Units

- Requirement: Qualification as Affordable Housing: Homeownership
- Citation: 24 CFR 92.254(a)(3) and 24 CFR 92.64(a) (Insular Areas)
- Explanation: This provision requires that a homebuyer housing unit developed with HOME funds have a ratified contract for sale to an eligible homebuyer within 9 months of the date of completion of construction or rehabilitation. If there is no ratified sales contract with an eligible homebuyer within 9 months of completion of construction or rehabilitation, the housing must be rented to an eligible tenant in accordance with §92.252. 24 CFR 92.64(a) applies these requirements to Insular Areas.
- Justification: Many PJs will not be able to meet this deadline due to the effect the COVID-19 pandemic will have on the ability of eligible households to qualify for mortgages as a result of income losses or the inability to schedule inspections, titles searches, or closings during periods of business closures. The waiver is necessary to prevent the loss of homeownership opportunities for HOME-eligible families and temporarily suspend the required corrective action of repayment of HOME funds or conversion of the homebuyer units to rental housing.
- Applicability: The waiver applies to projects for which the 9-month homebuyer sale deadline occurs on or after the date of this memorandum and extends the deadline for those projects to December 31, 2020. This waiver does not apply to the remaining requirements of the regulation, including that a homebuyer must receive housing counseling, and that a PJ must determine eligibility of a family by including the income of all persons living in the housing.

7. Use of HOME Funds for Operating Reserves for Troubled HOME Projects

- Requirement: Troubled HOME Projects
- Citations: 24 CFR 92.210(a) and (b) and 24 CFR 92.64(a) (Insular Areas)
- Explanation: 24 CFR 92.210 establishes provisions to permit HOME rental projects that are not financially viable (i.e., projects for which operating costs significantly exceed operating revenue) to be preserved through the use of HOME funds to recapitalize project reserves. 24 CFR 92.210(a) requires HUD to review market needs, available resources, and the likelihood of long-term viability of the project before approving this use of HOME funds. 24 CFR 92.210(b) requires a written memorandum of agreement between HUD and the PJ as a precondition of this funding and certain

limitations on the amount of funding. 24 CFR 92.64(a) applies these requirements to Insular Areas.

**Justification:** The waiver is necessary to enable PJs to take rapid action to preserve the financial viability of HOME-assisted affordable rental projects currently under a HOME period of affordability. Because existing tenants in HOME units may be unable to meet their rent obligations due to the economic impact of the COVID-19 pandemic, HOME rental projects may experience operating deficits due to the sudden decrease in rental revenue.

**Applicability:** The waiver applies to HOME-assisted rental projects currently within the period of affordability established in the HOME written agreement. PJs will not be required to obtain HUD approval or execute a memorandum of agreement with HUD before providing this assistance. PJs may only exercise this waiver authority when the project owner agrees to forego: 1) any distributions of residual receipts resulting from the project throughout the waiver period and for a period of 6 months thereafter; 2) any right under the existing lease agreement or State or local law to pursue legal action against tenants of HOME-assisted units for non-payment of rent and the collection of any fees associated with late payments without prior approval of the PJ; and 3) any adverse credit reporting against tenants of HOME-assisted units for nonpayment of rent or fees without prior approval of the PJ.

The PJ may provide additional HOME funds to recapitalize operating deficit reserves for HOME-assisted rental projects if the PJ determines that the project is experiencing operating deficits related to the economic effects of the COVID-19 pandemic during the waiver period. The PJ may only provide this assistance to projects experiencing operating deficits that will not be covered by insurance or other sources (e.g., other private, local, state, or federal funds).

The maximum amount of HOME assistance that may be provided is equal to the total of the project's operating expenses, previously scheduled payments to a replacement reserve, and actual debt service (excluding debt service of loans in forbearance) multiplied by the proportionate share of HOME-assisted units to the total number of units in the project for the period beginning on April 1, 2020 and ending on December 31, 2020. Project operating expenses may be demonstrated by one of the following:

- The Owner's most recent year to date financials for the project;
- Certified project-level accounting records covering the most recent 3 months; and
- Copies of project-level bank statements covering the most recent 3 months.

Project operating expenses may also be adjusted due to COVID-19-related expenditures and foregone expenses due to social distancing measures and other COVID-19-related impacts. An owner may demonstrate these expenses with recent receipts, copies of work orders, revised budgets that have been certified by the project owner as true, accurate representations of current expenditures.

In order to take advantage of this waiver, PJs must amend the HOME written agreement with the project owner to include the amount of HOME funds that will be provided to an operating reserve (i.e., the proportion of total costs attributable to HOME units as described in the paragraph above), the costs eligible to be paid with HOME funds in the operating reserve (i.e., operating expenses, scheduled payments to a replacement reserve, and qualifying debt service), and the documentation the PJ is required to maintain to demonstrate the allowable amounts and eligibility of costs paid with the HOME funds in the operating reserve.

The written agreement must specify that the owner must forego: 1) any distributions of residual receipts during the period this waiver is in effect and for a period of 6 months thereafter; 2) any right under the existing lease agreement or State or local law to pursue legal action against tenants of HOME-assisted units for non-payment of rent and the collection of any fees associated with late payments without prior approval of the PJ; and 3) any adverse credit reporting against tenants of HOME-assisted units for nonpayment of rent or fees without prior approval of the PJ.

Within 6 months following the waiver period, the PJ must review the project's records of actual revenue and operating expenses, total amount of HOME funds expended from the operating reserve, and the eligibility of expenses by examining invoices and receipts. The written agreement must require the project owner to repay any expenditures for costs determined to be ineligible and any balance of HOME funds remaining in the reserve after December 31, 2020. Any HOME funds repaid to the PJ must be deposited in the local HOME account and reported as program income in IDIS.

The waiver is effective through December 31, 2020.

8. Timeframe for a Participating Jurisdiction's Response to Findings of Noncompliance

Requirement:	Corrective and Remedial Actions
Citations:	24 CFR 92.551(b)(1) and 24 CFR 92.64(a) (Insular Areas)
Explanation:	24 CFR 92.551(b)(1) requires that if HUD determines preliminarily that a PJ has not met a provision of the HOME regulations, the PJ must be notified and given an opportunity to respond within a time period prescribed by



HUD, not to exceed 30 days. 24 CFR 92.64(a) applies this requirement to Insular Areas.

**Justification:** The waiver is necessary to permit HUD to provide PJs with an extended period to respond to findings of noncompliance in recognition of the unanticipated circumstances created by the COVID-19 pandemic. While HUD must continue its oversight function for the HOME Program, requiring PJs to respond to all findings of noncompliance within 30 days may interfere with a PJ's ability to address the unprecedented housing needs caused by the COVID-19 pandemic.

**Applicability:** The waiver applies to all findings of HOME regulatory noncompliance issued from the date of this memorandum through December 31, 2020. In the notice of findings, HUD will specify a time period for the PJ's response based on the nature of the noncompliance and required corrective action(s). HUD may also, upon request by the PJ, extend time periods imposed before the date of this memorandum.

Questions regarding this waiver should be directed to Virginia Sardone, Director, Office of Affordable Housing Programs (OAHP), or your OAHP desk officer. Participating jurisdictions and other HOME Program participants should contact the CPD Division of their local HUD Field Office.