

Atlanta Office
171 17th Street NW, Suite 2100
Atlanta, GA 30363-1031
Direct phone: 404.873.8124
Direct fax: 404.873.8125

April 26, 2021

Via Hand Delivery

Ms. Tonya Grier
Clerk to the Commission
Fulton County Board of Commissioners
141 Pryor Street, S.W.
Atlanta, Georgia 30303

Re: Development Authority of Fulton County – AMC Campus Project I, LLC Project

Dear Ms. Grier:

As attorney for the Development Authority of Fulton County (the “Issuer”), I am enclosing herewith for the signature of Chairman Pitts four copies of the TEFRA certificate, with attached standard supporting documentation, pertaining to the proposed issuance of its Development Authority of Fulton County Refunding Revenue Bonds (AMC Campus Project I, LLC Project) Series 2021, in an amount not to exceed \$9,500,000 (the “Bonds”). The Bonds will be issued for the benefit of AMC Campus Project I, LLC, a Georgia limited liability company (the “Company”), the sole member of which is Atlanta Metropolitan College Foundation, Inc., a Georgia nonprofit Corporation, for the purposes of (a) refunding all of the outstanding Development Authority of Fulton County Revenue Bonds (AMC Campus I, LLC Project), Series 2011 in the original principal amount of \$11,745,000, the proceeds of which were used to finance the cost of acquiring, constructing and equipping of a student activity center and related amenities, all located on the campus of Atlanta Metropolitan State College and within the corporate limits of Fulton County, Georgia and (b) paying the costs of issuing the Bonds. The Company’s facilities financed and refinanced by the Bonds will be owned and operated by the Company and the facilities are located at 1630 Metropolitan Parkway, S.W. in Fulton County, Georgia.

Please note that the Company commits to comply with the Issuer’s Minority and Female Business Enterprises Policy which was revised April 22, 2008, in accordance with the Fulton County Board of Commissioners Resolution adopted April 2, 2008, however, since this is a refinancing of existing debt, no new construction is anticipated for the project.

If you or Chairman Pitts have any questions, please call me. Otherwise, please ask Chairman Pitts to execute the enclosed certificates at his earliest opportunity, and please then return at least three executed certificates with supporting documentation to me at your earliest opportunity for further processing.

April 26, 2021

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Thank you for your cooperation in this matter.

Sincerely,


Sandra Z. Zayac

SZZ

Enclosures

cc: Mr. Richard Anderson (w/o encl.)
County Manager
cc: Ms. Kaye Burwell
Interim County Attorney

**CERTIFICATE OF CHAIRMAN OF FULTON COUNTY BOARD OF
COMMISSIONERS REGARDING PUBLIC APPROVAL FOR
DEVELOPMENT AUTHORITY OF FULTON COUNTY
REFUNDING REVENUE BOND FINANCING FOR
AMC CAMPUS PROJECT I, LLC**

The undersigned is the Chairman of the Fulton County Board of Commissioners, and as such is the designated chief elected executive official of Fulton County. AMC Campus Project I, LLC, a Georgia limited liability company (the "Company"), the sole member of which is Atlanta Metropolitan College Foundation, Inc., a Georgia nonprofit corporation, proposes to (a) refund all of the outstanding Development Authority of Fulton County Revenue Bonds (AMC Campus I, LLC Project), Series 2011 in the original principal amount of \$11,745,000, the proceeds of which were used to finance the cost of acquiring, constructing and equipping of a student activity center and related amenities, all located on the campus of Atlanta Metropolitan State College and within the corporate limits of Fulton County, Georgia and (b) pay the costs of issuing the Bonds (collectively, the "Project").

The Project is to be refinanced from the proceeds of the Bonds. The initial owner, operator or manager of the facilities refinanced by the Bonds will be the Company. The facilities refinanced by the Bonds are located in Fulton County.

On April 12, 2021, notice of the public hearing (the "Notice") was published on the website of the Development Authority of Fulton County. The Notice was designed to apprise residents of Fulton County of the proposed issuance of the Bonds by the Issuer and was published not less than 7 days before the scheduled date of the public hearing referred to in the Notice. A copy of the Publisher's Affidavit including a copy of the Notice is attached as Exhibit "A" to the Certification of Hearing Officer (the "Certification") dated April 26, 2021, which is attached hereto.

On April 26, 2021, a public hearing (the "Hearing") with regard to the issuance of the Bonds was held at 10:30 a.m. via teleconference in accordance with Revenue Procedure 2020-49 due to the COVID-19 pandemic. The Hearing was accessible to the residents of the approving governmental unit by calling a toll-free telephone number. The public was invited to join by dialing 1-888-897-5640 (Passcode: 405675#). The Hearing was conducted in a manner that provided a reasonable opportunity for persons with differing views on both the issuance of the Bonds and the location and nature of the Project to be heard, as evidenced by the Certification, which is attached hereto.

The proceedings have been reviewed and determination made that the issuance of the Bonds is legally proper and a placement/investment letter and a Minority and Female Business Enterprise Policy ("MFBE") Utilization Report has been received, as evidenced by the Exhibits "C", "D" and "E", respectively, to the Certification, which is attached hereto.

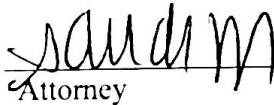
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Based on the foregoing, the undersigned duly approves the issuance of the Bonds as contemplated by the Notice for the purpose of refinancing the Project for the Company. This approval is solely intended to comply with the provisions of Section 147(f) of the Internal Revenue Code of 1986, as amended, and shall not result in or impose any pecuniary liability upon or constitute a lien upon the property or a claim against the Fulton County, the State of Georgia, or a political subdivision thereof.

This ____ day of _____, 2021.

Robert L. Pitts
Chairman, Board of Commissioners of
Fulton County, Georgia

Approved as to form:



Attorney

**CERTIFICATION
RELATIVE TO THE ISSUANCE OF
DEVELOPMENT AUTHORITY OF FULTON COUNTY
REFUNDING REVENUE BOND FINANCING
(AMC CAMPUS PROJECT I, LLC)**

WHEREAS, the DEVELOPMENT AUTHORITY OF FULTON COUNTY (the "Issuer") is considering adoption of or has adopted a Resolution (the "Resolution") providing for the issuance of Development Authority of Fulton County Refunding Revenue Bonds (AMC Campus Project I, Project), Series 2021, in an amount not to exceed \$9,500,000 (the "Bonds"); and

WHEREAS, prior to the adoption of the Resolution, notice of public hearing (the "Notice") was published on April 12, 2021 on the website of the Issuer, as evidenced by the copy of Publisher's Affidavit including a copy of the Notice attached hereto as Exhibit "A". The Notice was designed to apprise residents of Fulton County of the proposed issuance of the Bonds by the Issuer and was published not less than 7 days before the scheduled date of the public hearing referred to in the Notice; and

WHEREAS, on April 26, 2021, a public hearing (the "Hearing") with regard to the issuance of the Bonds was held at 10:30 a.m. via teleconference in accordance with Revenue Procedure 2020-49 due to the COVID-19 pandemic. The Hearing was accessible to the residents of the approving governmental unit by calling a toll-free telephone number. The public was invited to join by dialing 1-888-897-5640 (Passcode: 405675#). The Hearing was conducted by the undersigned as authorized hearing officer for the Issuer in a manner that provided a reasonable opportunity to be heard for persons with differing views on both the issuance of the Bonds and the location and nature of the Project; and

WHEREAS, the names and addresses of all parties attending the Hearing, together with a summary of matters discussed at the Hearing, are set forth on the Hearing Report attached hereto as Exhibit "B"; and

WHEREAS, the documents involved in the proposed issuance of the Bonds have been approved by the attorney for the Issuer, as evidenced by an opinion letter attached hereto as Exhibit "C"; and

WHEREAS, a placement/investment letter relating to the contemplated placement or underwriting and sale of the Bonds, a copy of which is attached hereto as Exhibit "D", has been furnished to the Issuer, as required by procedures adopted by the Board of Commissioners of Fulton County;

WHEREAS, a Minority and Female Business Enterprise Policy ("MFBE") Utilization Report, a copy of which is attached hereto as Exhibit "E", has been furnished to the Issuer, as required by procedures adopted by the Board of Commissioners of Fulton County;

WHEREAS, a copy of the Issuer's Minority and Female Business Enterprise Policy is attached hereto as Exhibit "F", as required by procedures adopted by the Board of Commissioners of Fulton County;

NOW, THEREFORE, the undersigned does hereby certify the above facts are true and correct and does request the Board of Commissioners of Fulton County approve the issuance of the Development Authority of Fulton County Refunding Revenue Bonds (AMC Campus Project I, LLC Project), Series 2021, for the purpose of complying with Section 147(f) of the Internal Revenue Code of 1986.

Given under my hand and seal of the Issuer, this 26th day of April, 2021.

A handwritten signature in black ink, appearing to read 'LW Daniels', written over a horizontal line.

LAUREN W. DANIELS
Hearing Officer, Development
Authority of Fulton County

EXHIBIT "A"

(PUBLISHER'S AFFIDAVIT)

TEFRA Notices

<https://www.developfultoncounty.com/> > [TEFRA Notices \(https://www.developfultoncounty.com/tefra-notices/\)](https://www.developfultoncounty.com/tefra-notices/)

> Available TEFRA Notices

Below are all available TEFRA notices. Click "Download TEFRA Notice" beside a date to retrieve the file.

WellStar Health System, Inc. (Date Posted: December 27, 2019)

[Download TEFRA Notice](#) 

TUFF CAUB LLC (Date Posted: January 25, 2021)

[Download TEFRA Notice](#) 

The Westminster Schools, Inc. (Date Posted: February 10, 2020)

[Download TEFRA Notice](#) 

Reserve at Hollywood LLC (Date Posted: February 22, 2021)

[Download TEFRA Notice](#) 

Reserve at Hollywood LLC (Date Posted: February 10, 2020)

[Download TEFRA Notice](#) 

Piedmont Healthcare, Inc. (Date Posted: August 14, 2019)

[Download TEFRA Notice](#) 

Holy Innocents' Episcopal School, Inc. (Date Posted: July 13, 2020)

[Download TEFRA Notice](#) 

Georgia Tech Facilities, Inc. (Date Posted: January 25, 2021)

[Download TEFRA Notice](#) 



DEVELOPMENT AUTHORITY
of **FULTON COUNTY**

Development Authority of Fulton County

141 Pryor Street S.W.

Suite 2052

Atlanta, Georgia 30303

Phone:  **404.612.8078** <tel:4046128078>

Fax: 404.612.3895

 Search

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- [TEFRA Notices](#) [https://www.dafc.ga.gov/development/tefra-notices/](#)
- [Monthly Meetings](#) [https://www.dafc.ga.gov/](#)
- [Archived Minutes/Agendas](#) [https://www.dafc.ga.gov/](#)
- [FAQ](#) [https://www.dafc.ga.gov/faq/](#)
- [News | Newsletter](#) [https://www.dafc.ga.gov/news/](#)

NOTICE OF PUBLIC HEARING ON
PROPOSED REVENUE BOND FINANCING BY THE
DEVELOPMENT AUTHORITY OF FULTON COUNTY FOR THE BENEFIT OF
AMC CAMPUS PROJECT I, LLC

YOU ARE HEREBY NOTIFIED that on the 26th day of April, 2021 at 10:30 a.m., the Development Authority of Fulton County (the "Issuer") will hold a public hearing via teleconference with respect to the issuance by the Issuer of up to \$9,500,000 in aggregate principal amount of its revenue bonds (the "Series 2021 Bonds"), the proceeds of which will be used to (a) refund all of the outstanding Development Authority of Fulton County Revenue Bonds (AMC Campus Project 1, LLC Project), Series 2011 in the original principal amount of \$11,745,000 (the "Series 2011 Bonds") and (b) pay the costs of issuing the Series 2021 Bonds. The proceeds of the Series 2011 Bonds were used, among other things, to finance the cost of acquiring, constructing and equipping of a student activity center and related amenities, all located on the campus of Atlanta Metropolitan State College (the "College") and within the corporate limits of Fulton County, Georgia (the "Project"). The Project is located on the campus of the College at 1630 Metropolitan Parkway, S.W., Atlanta, Georgia 30310. Proceeds of the Series 2021 Bonds will be loaned to and used by AMC Campus Project I, LLC, a Georgia limited liability company (the "Company"), the sole member of which is Atlanta Metropolitan College Foundation, Inc., a Georgia nonprofit corporation, to be used for the purposes described above. The Company will continue to own the Project beginning on the date of issuance and delivery of the Series 2021 Bonds, and the Project is and will continue to be operated by the Board of Regents of the University System of Georgia for use by the College.

The Series 2021 Bonds will not constitute an indebtedness or obligation of the State of Georgia or of any county, municipal corporation or political subdivision thereof, but will be payable solely from revenues derived from the Company and pledged to the payment thereof.

The hearing will be held via teleconference in accordance with Revenue Procedure 2020-49 due to the COVID-19 pandemic and will be accessible to the residents of the approving governmental unit by dialing 1-888-897-5640 (Passcode: 405 675#). Any person interested in the proposed issuance of the Series 2021 Bonds to finance the costs of the Project and pay the costs described herein may join the meeting as instructed above and appear and be heard.

THE ISSUER WILL NOT CONDUCT A PERFORMANCE AUDIT OR PERFORMANCE REVIEW WITH RESPECT TO THE SERIES 2021 BONDS AS SUCH TERMS ARE DESCRIBED IN SECTION 36-82-100 OF THE OFFICIAL CODE OF GEORGIA ANNOTATED.

DEVELOPMENT AUTHORITY OF FULTON COUNTY

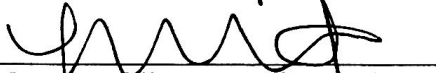
AFFIDAVIT OF PUBLICATION

Personally appeared before the undersigned officer authorized to administer oaths, Sabrina Kirkland, who upon being duly sworn deposes and says as follows:

I am the Executive Assistant/Technology Associate of the *Development Authority of Fulton County*, a public body corporate and politic, duly created by the Development Authorities Law, O.C.G.A. § 36-62-1, *et seq.* and activated by resolution, as amended, of the governing body of Fulton County. Pursuant to Section 147(f) of the Internal Revenue Code of 1986, as amended (26 C.F.R. § 1.147(f)-1 (2018)), public notice has been given by electronic posting on the public website of the *Development Authority of Fulton County*, the on-behalf-of issuer, as an alternative to the public website of the approving governmental unit. Attached hereto is a true and correct copy of the publication of the TEFRA Notice concerning AMC Campus Project I, LLC, which was published on the *Development Authority of Fulton County* website (<https://www.developfultoncounty.com/tefra-notices>) in an area of the website used to inform its residents about events affecting the residents on the following date: April 12, 2021.


Print Name: Sabrina Kirkland

Sworn to and subscribed before me
this 12th day of April, 2021.


Notary Public, State of Georgia

My commission expires: 01/23/2022

[NOTARY SEAL]

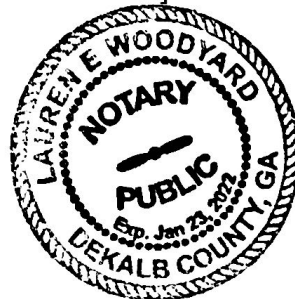


EXHIBIT "B"

(HEARING REPORT)

1. The names and addresses of all parties present for the Hearing are as follows:

No parties were in attendance.

2. The matters discussed at the Hearing are summarized as follows:

Because no parties were present at the Hearing, no matters were discussed.

EXHIBIT "C"

(LETTER OF AUTHORITY ATTORNEY)

April 26, 2021

The Board of Commissioners
of Fulton County
Atlanta, Georgia

Development Authority of
Fulton County
Atlanta, Georgia

Dear Sir or Madam:

We are delivering this opinion in compliance with the requirements of the Chairman of the Fulton County Commission relative to approval of financing.

This opinion is to accompany the approval of the Issuer and Financing described as follows:

Issuer:	Development Authority of Fulton County
Financing:	Refunding Revenue Bonds in the aggregate principal amount not to exceed \$9,500,000 (the "Bonds")
Borrower:	AMC Campus Project I, LLC
Project:	to (a) refund all of the outstanding Development Authority of Fulton County Revenue Bonds (AMC Campus I, LLC Project), Series 2011 in the original principal amount of \$11,745,000, the proceeds of which were used to finance the cost of acquiring, constructing and equipping of a student activity center and related amenities, all located on the campus of Atlanta Metropolitan State College and within the corporate limits of Fulton County, Georgia and (b) paying the costs of issuing the Bonds.

Public hearing was held before the Development Authority of Fulton County on April 26, 2021, pursuant to an advertisement appearing on the website of the Development Authority of Fulton County on April 12, 2021.

April 26, 2021

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In rendering this opinion, with your permission, we have relied conclusively on representations of the representatives of the Issuer, the Borrower, or both as to the correctness of the information set forth above.

Based on the foregoing, we are of the opinion that the Issuer is authorized under the laws of the State of Georgia to issue its revenue bonds to finance projects of the type and nature described hereinabove pursuant to Article IX, Section VI, Paragraph III, of the Constitution of Georgia of 1983, as amended, the Development Authorities Law (O.C.G.A. 36-62-1 et seq.) and the Revenue Bond Law (O.C.G.A. 36-82-60 et seq.).

This opinion relates solely to the application relating to the Financing identified above as submitted by or on behalf of the Borrower to the Issuer, and is rendered solely to the parties to whom it is addressed. This opinion is not to be used for any other purpose, quoted in whole or in part, relied upon by or delivered to any other person or party.

Sincerely,



Sandra Z. Zayao

SZZ
Enclosures

EXHIBIT “D”

(Placement/Investment Letter)



April 1, 2021

Development Authority of Fulton County
c/o Sandra Zayac
Arnall Golden Gregory LLP
171 17th Street NW, Suite 2100
Atlanta, Georgia 30363

RE: Development Authority of Fulton County, Georgia – Refunding Revenue Bonds
(AMC Campus Project I, LLC Project), Series 2021 (the “Bonds”)

To Whom It May Concern:

PNC Capital Markets LLC (“PNCCM”) has been engaged as underwriter for the proposed issuance of the Bonds in an amount not to exceed \$9,500,000 and we understand that this Letter of Intent is a required component of the Development Authority of Fulton County (“DAFC”) application process.

I am pleased to advise you that, subject to the terms and conditions set forth herein, PNCCM hereby expresses its intent to serve as underwriter for the proposed bond financing for the benefit of AMC Campus Project I, LLC (“Borrower”) anticipated to be issued by DAFC.

While PNCCM is currently expected to purchase the Bonds, a commitment to purchase the Bonds is subject to review of the appropriate documentation, satisfactory due diligence, delivery of requisite opinions and certifications in a form reasonably acceptable to us, and execution of a bond purchase agreement to be executed by and among DAFC, the Borrower, and PNCCM.

If you should have any questions or require additional information, please don’t hesitate to contact me at (215) 585-1085.

Sincerely,

A handwritten signature in dark ink, appearing to read "JL", written over a horizontal line.

Name: James Lanham
Title: Director

PNC Capital Markets LLC
Member of The PNC Financial Services Group
1990 East Ninth Street, 21st Floor, Cleveland, OH 44114
www.pnc.com

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MUNICIPAL ADVISOR AND G-17 DISCLOSURE

PNC Capital Markets LLC ("PNCCM") is providing the information contained in this document for discussion purposes only in anticipation of serving as an underwriter to the issuer to whom this document is addressed. The information provided herein is not intended to be and should not be construed as "advice" within the meaning of Section 15B of the Securities Exchange Act of 1934, as amended ("Exchange Act"), unless such advice is provided (i) within the scope of an underwriting of an issuance of municipal securities for which PNCCM is acting or seeking to act as underwriter, (ii) to an issuer that is separately advised by an independent registered municipal advisor, pursuant to the requirements of Exchange Act Rule 15Ba1-1(d)(3)(vi), or (iii) in response to a written or oral request for proposals or qualifications. PNCCM is not acting as a municipal advisor, and is not subject to the fiduciary duty established in Section 15B(c)(1) of the Exchange Act, with respect to this communication or any related municipal financial product or issuance of municipal securities.

The following disclosures are required by Municipal Securities Rulemaking Board ("MSRB") Rule G-17, as PNCCM proposes to serve as an underwriter, and not as a financial advisor, municipal advisor or fiduciary to any person or entity, in connection with the issuance and sale of securities for the issuer to whom this is addressed: (i) MSRB Rule G-17 requires an underwriter to deal fairly at all times with both municipal issuers and investors. (ii) An underwriter's primary role is to purchase securities with a view to distribution in an arm's-length commercial transaction with an issuer, and an underwriter has financial and other interests that differ from those of such an issuer. (iii) Unlike a municipal advisor, an underwriter does not have a fiduciary duty to an issuer under the federal securities laws and is, therefore, not required by federal law to act in the best interests of that issuer without regard to its own financial or other interests. (iv) An underwriter has a duty to purchase securities from an issuer at a fair and reasonable price, but must balance that duty with its duty to sell those securities to investors at prices that are fair and reasonable. (v) An underwriter will review the official statement, if any, for those securities in accordance with, and as part of, its responsibilities to investors under the federal securities laws, as applied to the facts and circumstances of the transaction. (vi) The issuer may choose to engage the services of a municipal advisor with a fiduciary obligation to represent the issuer's interests in the transaction.

STANDARD DISCLOSURE

PNC Capital Markets LLC ("PNCCM"), member FINRA and SIPC, is a wholly owned subsidiary of The PNC Financial Services Group, Inc. ("PNC") and affiliate of PNC Bank, National Association ("PNC Bank"). PNCCM is not a bank or thrift, but rather, it is a separate and distinct corporate entity from its bank affiliate.

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EXHIBIT “E”

(Minority and Female Business Enterprise Policy Utilization Report of Company)

This report must be submitted at the earlier of the date of TEEFRA approval or final bond resolution, and thereafter, updated reports must be submitted on a quarterly basis, beginning with the first full quarter following the date of final bond resolution, to be received by the tenth day following the last day of the relevant quarter. The report should be mailed/mailed to: Development Authority of Fulton County, 141 Pryor Street, S.W., Suite 2052 (Peachtree Level), Atlanta, Georgia 30303 (sandra.zayac@agc.com). Upon the first submission of this report, please attach a copy of the Borrower's policy on hiring of minorities and females or the Prime Contractor's policy on the utilization of minority and female-owned businesses, as applicable. Please complete the report with "N/A - not applicable for refunding transactions" or mark "Not yet engaged" if contractors or subcontractors have not yet been retained.

REPORTING PERIOD	PROJECT NAME:	Atlanta Metropolitan State College Student Center Refunding Bonds
FROM:	BOND CAPTION:	Development Authority of Fulton County Refunding Revenue Bonds (AMC Campus Project I, LLC Project), Series 2021
TO:	PROJECT ADDRESS:	1630 Metropolitan Parkway, S.W., Atlanta, GA 30310

PRIME CONTRACTOR (Identify if MFBE)		Contract Award Date	Contract Award Amount	Change Order Amount	Contract Period
Name:	N/A - not applicable for refunding transactions				
Address:					
Telephone #:					

AMOUNT OF REQUISITION THIS PERIOD:	\$
TOTAL AMOUNT REQUISITION TO DATE:	\$

Continue on additional page if necessary

Name of Sub-Contractor or Vendor (Identify if MFBE)	Description of Work or Goods Purchased	Contract Amount	Amount Paid To Date	Amount Requisition This Period	Contract Period Starting Date Ending Date
N/A - not applicable for refunding transactions					
TOTALS					

Borrower's Representative: Nick Henry

Address: 1630 Metropolitan Parkway, S.W., Atlanta, GA 30310

Executed By: [Signature] (Print Name)

Phone: (706) 272-4418

Title: Interim Vice President for Fiscal Affairs,

Date: 4/5/2021

Email: nhenry@atlm.edu

Atlanta Metropolitan State College

EXHIBIT "F"

(Copy of Authority's Minority and Female Business Enterprise Policy Revisions Adopted April 22, 2008)

It is the policy of the Development Authority of Fulton County that discrimination against businesses by reason of the race, color, gender or national origin of the ownership of any such business is prohibited. The Company shall utilize contractors, subcontractors, suppliers and vendors that do not discriminate against employees or employment applicants because of race, color, gender or national origin, in connection with the development of the Project. The Company shall also make a good faith effort to utilize, to the extent feasible and reasonable under the circumstances, minority or female owned enterprises in connection with the development of the Project. In furtherance of this effort, the Company shall furnish to the Authority, at or before the earlier of the date of submission of TEFRA approval documentation, if applicable, or of the final bond resolution, a written report (i) projecting its utilization of minority and female owned business enterprises in connection with the construction and/or equipping of the proposed Project, (ii) identifying all significant contractors, subcontractors, suppliers, or vendors engaged or utilized to date in connection with the development of the Project, and (iii) specifically identifying all minority or female owned contractors, subcontractors, suppliers or vendors engaged or utilized to date. The report shall also identify a Company representative who will be responsible for future contact and information regarding minority and female owned business enterprise utilization in connection with Project construction and/or acquisition of personal property in conjunction with the Project. In addition to the aforementioned initial written report, the Company shall file updated reports with the Authority on a quarterly basis, beginning with the first full quarter following the date of final bond resolution and continuing through the date of completion of the Project. The Company shall also consent to on-site monitoring visits by the Authority to evaluate compliance with the Policy.