FULTON COUNTY

Department of Housing & Community Development

141 Pryor Street S.W., Suite 5001
Atlanta, GA 30303

Neighborhood Stabilization Program 2 (NSP2)

APPLICATION NUMBER: 328045434

Contact: Melvin Richardson, Interim Director
404-612-8060

Melvin.Richardson@fultoncountyga.gov

Due By: July 17, 2009

U.S. Dept of Housing & Urban Development
Robert C. Weaver Federal Building
NSP2 Applications - Room 7286
Office of Block Grant Assistance
451 7th Street, SW
Washington, DC 20410

OMB Number: 4040-0004
Expiration Date: 01/31/2009

Application for Federal Assistance SF-424 Version 02

*1. Type of Submission:	*2. Type of Application	* If Revision, select appropriate letter(s)
☐ Preapplication	☒ New	
☒ Application	☐ Continuation	*Other (Specify)
☐ Changed/Corrected Application	☐ Revision	

3. Date Received:	4. Applicant Identifier:

5a. Federal Entity Identifier:	*5b. Federal Award Identifier:
328045434	

State Use Only:

6. Date Received by State:	7. State Application Identifier:

8. APPLICANT INFORMATION:

*a. Legal Name: Fulton County, Georgia

*b. Employer/Taxpayer Identification Number (EIN/TIN):	*c. Organizational DUNS:
58-6001729	133894167

d. Address:

*Street 1: 141 Pryor Street S.W.
Street 2:
*City: Atlanta
County: Fulton
*State: Georgia
Province:
*Country: U.S.A.
*Zip / Postal Code 30303

e. Organizational Unit:

Department Name:	Division Name:
Housing and Community Development	

f. Name and contact information of person to be contacted on matters involving this application:

Prefix: Mr. *First Name: Melvin
Middle Name:
*Last Name: Richardson
Suffix:

Title: Interim Director

Organizational Affiliation:

*Telephone Number: 404-612-8060 Fax Number:

*Email: melvin.richardson@fultoncountyga.gov

OMB Number: 4040-0004
Expiration Date: 01/31/2009

Application for Federal Assistance SF-424 Version 02

***9. Type of Applicant 1: Select Applicant Type:**

B.County Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

*Other (Specify)

***10 Name of Federal Agency:**

Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

14.256

CFDA Title:

NSP2

***12 Funding Opportunity Number:**

FR-5321-C-01

*Title:

NSP2

13. Competition Identification Number:

328045434

Title:

NSP2

14. Areas Affected by Project (Cities, Counties, States, etc.):

Fulton County, Georgia, census tracts: 103.01, 103.04, 105.07, 105.08, 105.09, 105.10, 105.11, 105.12, 105.13, 105.14, 106.04, 113.04

***15. Descriptive Title of Applicant's Project:**

Fulton County, NSP2

OMB Number: 4040-0004
Expiration Date: 01/31/2009

Application for Federal Assistance SF-424 Version 02

16. Congressional Districts Of:

*a. Applicant: GA-005, GA-006, GA-013 *b. Program/Project: GA-005, GA-013

17. Proposed Project:

*a. Start Date: January 1, 2010 *b. End Date: December 31,2012

18. Estimated Funding ($):

*a. Federal	$15,489,375
*b. Applicant	
*c. State	
*d. Local	
*e. Other	
*f. Program Income	
*g. TOTAL	$15,489,375

***19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

☒ a. This application was made available to the State under the Executive Order 12372 Process for review on July 15, 2009

☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.

☐ c. Program is not covered by E. O. 12372

***20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes", provide explanation.)**

☐ Yes ☒ No

21. *By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U. S. Code, Title 218, Section 1001)

☒ ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions

Authorized Representative:

Prefix: Mr. *First Name: Zachary

Middle Name:

*Last Name: Williams

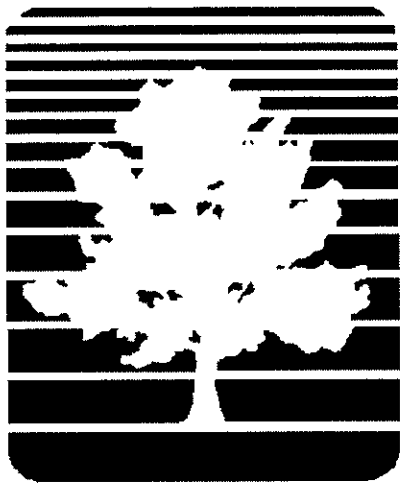
Suffix:

*Title: County Manager

*Telephone Number: 404-612-8335 Fax Number:

* Email: zachary.williams@fultoncountyga.gov

*Signature of Authorized Representative: *Date Signed: July 15, 2009



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PROGRAM SUMMARY

Strong families and neighborhoods have always been the staple of cities, towns, and counties. As times change and the economy moves in a downward spiral, more and more families are suffering. Economic and housing development is diminishing. Communities and neighborhoods have an increasing number of vacant houses and they begin to look barren. It is hard and becoming increasingly difficult for families to survive.

Fulton County, established in 1853, is the largest county in Georgia, with more than 535 square miles of land and a population of 1,014,932 (U.S. Census Bureau, 2008). As a preferred county for economic development and relocation, Fulton is currently experiencing the greatest housing crisis in its 156 year history; the magnitude of which stands to threaten the very viability of the County as a whole.

Fulton County Department of Housing and Urban Development has identified twelve (12) census tracts within the unincorporated region of South Fulton County that have suffered disproportionately from the destabilizing effects of foreclosures. The need for stabilization is now; the enormity of this economic emergency, coupled with mounting foreclosures and vacancies, has resulted in a continued destabilizing threat to Fulton County neighborhoods.

In consulting with other agencies, reviewing of the extent of the County's foreclosure crisis, and considering the overall size of the County, Fulton has elected to address and stabilize this trend utilizing a holistic strategic approach. The County has therefore reconciled to submit an application which allows for the continuation and advancement of a specialized, comprehensive, and targeted program aimed towards neighborhood stabilization.

Stabilizing Fulton's neighborhoods involves more than acquiring properties, rehabilitating them, and putting them back on the market. A successful neighborhood stabilization program recognizes that housing, health, economic development, and social networks all work in tandem to produce healthy, affordable, long term, quality of life, thriving communities. Fulton County recognizing this fact will address this crisis utilizing an innovative comprehensive program model.

In 2008, the Georgia Division of Community Health conducted a county-by-county assessment to look at the major socio-economic factors that influence differences in health status and their relationship to racial and ethnic characteristics. The results reported in *Health Disparities Report 2008: A County-Level Look at Health Outcomes for minorities in Georgia* concluded that Fulton County is one of 16 counties in the state with the greatest health and socio-economic challenges for minorities. In August 2008, Fulton County began the framework for neighborhood stabilization by developing a program which maximized County resources, addressed health disparities and attended to destabilizing influences within its neighborhoods. The Fulton County Board of Commissioners passed a resolution in support of the development of a Fulton County Health Initiative to reduce health and social disparities in Fulton County. The initiative known as "Common Ground," a collaboration of the Departments of Health and Wellness, Mental Health, Developmental Disabilities and Addictive Diseases, Human Services, and Housing and Community Development was tasked with developing a proposal which would address both social inequities and destabilizing influences within our communities. The Common Ground

Initiative seeks to address the factors known to be social determinants of health including: social networks, social/environmental stressors, social support, social capital, transportation, neighborhood characteristics, housing, violence, education, and access to services. Fulton County has established the Common Ground initiative to address the complex issues of health and social disparities by employing strategies aimed at influencing these social determinants of health. The complexity and magnitude of this initiative required a major paradigm shift from the usual business of county government. It also required unprecedented collaboration on the part of the Fulton County, community agencies, local municipalities, regional agencies, and the State of Georgia.

Governmental agencies that are involved include:

- Elected Officials/ Policy Makers
- Department of Economic Development
- Department of Family and Children Services
- Fulton County Department of General Services
- Department of Public Works
- Fulton County Arts Council
- Fulton County Library
- Fulton County Police Department
- Department of Housing and Community Development
- Code Enforcement
- Fulton County Parks and Recreation
- Cooperative Extension

Through conversations with the State of Georgia's Department of Community Affairs, the Atlanta Regional Commission, affordable housing practitioners, realtors, planners, non-profit housing organizations, those in the mortgage industry, and internal departments, the County has determined the Common Ground approach to be the best model for the County's application. The planning, integration, and collaborative elements of the Common Ground Initiative coupled with NSP2s programmatic eligible activities of acquisition, rehabilitation, and down payment assistance will produce ground-breaking results, arrest rapid decline, and revitalize target neighborhoods while ensuring longevity and continued affordability.

In budgeting for this program, Fulton County is requesting $15,489,375. The $15.5 million represents the purchase and rehabilitation of 120 homes at a cost per unit of approximately $120,000, $15,000 for rehabilitation, $7,500 for down payment assistance, and $250.00 for mandatory housing counseling. In accordance with 24 CFR 570.206, up to ten percent of funds will be utilized for administrative cost.

Functionally, NSP1 & 2 will be administered through the NSP Section of Housing and Community Development, with dedicated NSP staff performing programmatic activities. The Common Ground approach links Research & Planning, Geographic Information System (GIS), Grant Development, Epidemiology, Administrative Finance, Professional Standards, Policy, and Housing to integrate planning, policy analysis, and program development/continuous improvement, to produce stabilization solutions, with the end goal of creating "optimal neighborhoods."

Fulton County defines an optimal neighborhood as one having an array of socio-economic opportunities, strong business industry, affordable housing, shopping centers with restaurants, cultural activities, theatres, playgrounds, good transportation, parks, walking trails, enhanced street lighting, access to quality health care, and public safety.

It is the intent of the County to implement neighborhood stabilizing activities and to aggressively leverage partnerships which lend to the overall revitalization and economic re-connectivity. This will be accomplished through targeting funds from other programs (HOME, CDBG, etc.) as well as leveraging funds, services, and compatible programs from community partners and sources.

Eligibility of Applicant

This application for Neighborhood Stabilization Program 2 (NSP2) funding is being submitted by Fulton County, Georgia as the sole applicant. Fulton County meets all threshold requirements to submit this application as noted below.

Amount

The amount requested is $15,489,375. This is projected to allow for 120 abandoned or foreclosed homes to return to productive use and eliminate the negative effects they have created in the communities in which they are located.

Eligible Fund Use

Funds will only be used for eligible activities as outlined in the Housing and Economic Recovery Act of 2008 and amended in the American Reinvestment and Recovery Act of 2009. Please see the included budget for a detailed summary of the activities to be undertaken with this grant.

Income Targeting/Benefit

All funding received under this application shall be used to benefit only those households at or below 120% of the area median income as determined by HUD for metro Atlanta. In addition, a minimum of 25% of the funding received by Fulton County for NSP2 will be used for the purchase and redevelopment of abandoned or foreclosed homes or residential properties that will be used to house individuals or families whose incomes do not exceed 50% of the area median income for metro Atlanta as determined by HUD.

Fulton County FY 2009 Income Limits for 50% of HUD Area Median Income							
1 person household	2 person household	3 person household	4 person household	5 person household	6 person household	7 person household	8 person household
$25,100.00	$28,700.00	$32,250.00	$35,850.00	$38,700.00	$41,600.00	$44,450.00	$47,300.00
Fulton County **FY 2009 Income Limits for 120% of HUD Area Median Income**							
1 person household	2 person household	3 person household	4 person household	5 person household	6 person household	7 person household	8 person household
$60,225.00	$68,850.00	$77,400.00	$86,025.00	$92,925.00	$99,825.00	$106,650.00	$113,550

Citizen Participation

Citizen participation has been solicited and the project description, along with the budget and proposed geographic areas to be served, were advertised in the **Fulton County Daily Report**, the legal organ of the County, on June 19, 2009 and June 22, 2009. The comment period ran from June 22 through July 3, 2009. Plans were also posted on Fulton County's website at http://www.fultoncountyga.gov/index.php/government-news/neighborhood-stabilization-program-2-nsp2.html in accordance with HUD guidelines. No public comments were received.

Definitions

Definitions of "blighted structures" and "affordable rents" appear in Appendix I along with a description of the housing rehabilitation standards to be used for all properties acquired with NSP2 funds.

Demonstrated Organizational Capacity

Fulton County has a long history of housing redevelopment and partnering with both for-profit and non-profit entities. Fulton County completed rehabilitation on 139 units of housing with the use of CDBG and HOME funding during the period of May 4, 2007 through May 3, 2009. These were completed as part of a community development program where grants and deferred payment loans were provided to income-eligible owner-occupants to address code violations at their homes.

Geographic Need

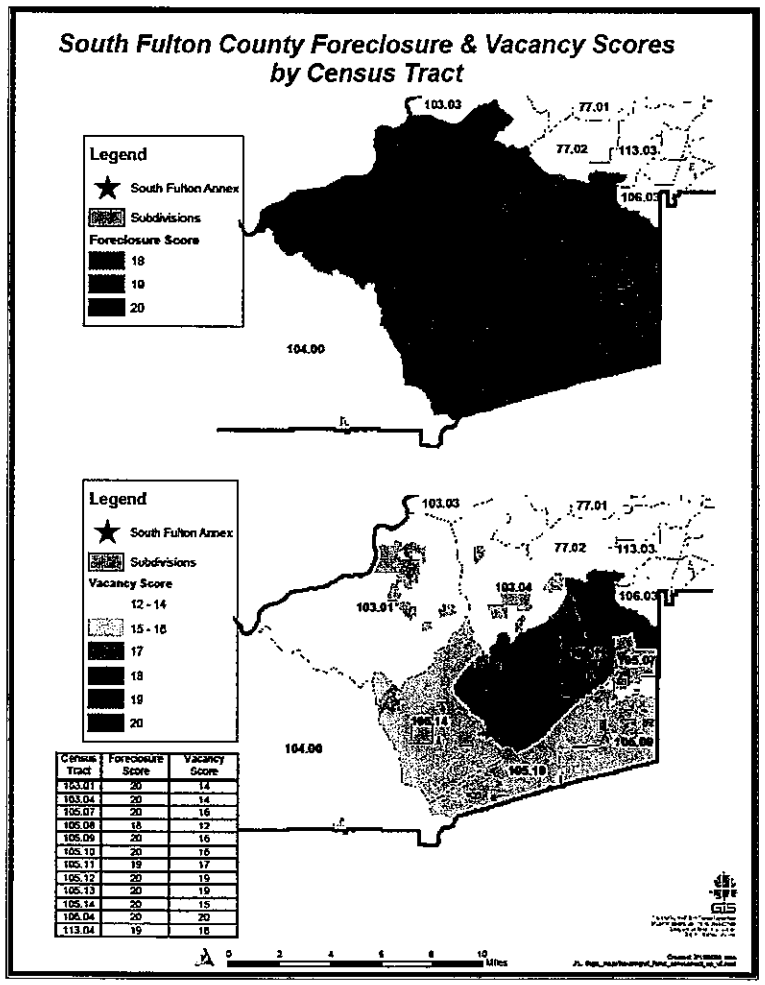
Twelve census tracts have been targeted within Fulton County. These areas qualify for inclusion in the target geography based upon foreclosures, vacancy risk index scores, and income eligibility. A listing of these census tracts is included in Appendix II with further discussion about the County's priorities in determining where to concentrate its NSP2 efforts.

FACTOR 1:
NEED/EXTENT OF THE PROBLEM

A. Target Geography

Fulton County is targeting 12 census tracts located within South Fulton County which qualify for inclusion in the target geography based upon their foreclosure needs and vacancy risk index scores. A complete listing of the specific geography by census tracts with both neighborhood stabilization index scores can be found in the Appendix 7. The average foreclosure risk score of all 12 census tracts in the County is 19.5, which exceeds the minimum requirement needed for NSP2 eligibility.

By utilizing the average foreclosure needs index score for Fulton County census tracts, the County will focus on foreclosures and vacancy scores of 18 or higher within the target area. Beginning efforts will be directed towards those areas within a five mile radius of the South Fulton Service Center. It is anticipated by targeting these neighborhoods and leveraging the support services available in these neighborhoods, greater impact towards stabilization will result.



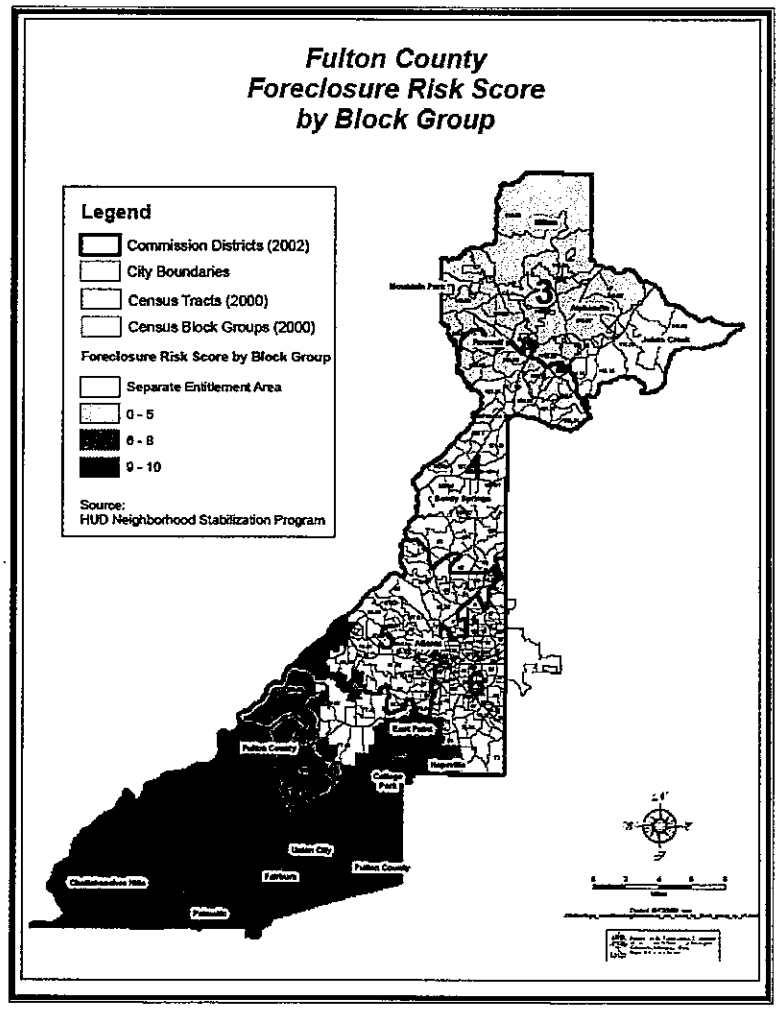
These areas were chosen for reasons beyond the foreclosure and other census data, but because this chosen geographic area represents some of the most blighted of urban areas in the Southeast.

Housing Market Issues:

According to the HUD data sets, there are 3,511 foreclosure petitions or seriously delinquent mortgages in the 12 census tracts identified and targeted for NSP2 funds, comprising the highest portion of foreclosures in the County. It is assumed that this number continues to grow based on the socio-economic conditions in this area. According to the April 2009 data found in the Absorption Report of the Multiple Listing Service for Georgia, the average number of days on the market for new (detached) homes in the target geographic area was 124 days. For the same period the average number of days on the market for a resale (also detached) was 84 days,

indicating a better response for the resale market as opposed to new homes; however, economic conditions continue to worsen especially in the target geographic area.

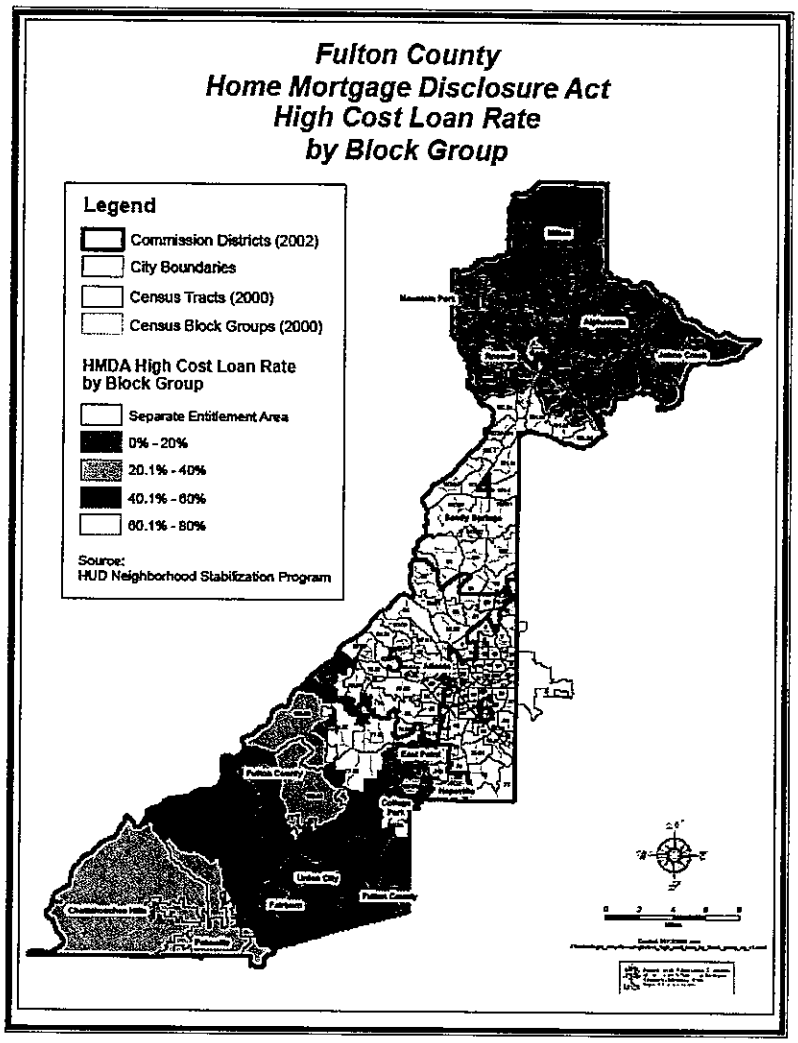
Disturbingly, home values have plummeted because of the number of high foreclosed and vacant residential properties within the target area. Individuals not delinquent on their mortgage payments who seek to sell their homes have found it extremely difficult to do so. These socio-economic conditions and others will lead to further decline if not halted by mitigating the conditions which promote decline. As can be seen in the following map, many of the census tracts in the target geography have HUD risk scores of 9 or 10 and foreclosure/vacancy rates of 18 or greater; all of which meet this classification.



Credit Issues:

High cost and predatory loans also lead to decline when families are unable to pay their mortgages and lose their homes to foreclosure. High cost loans are found in the areas where this project is proposed, further indicating both decline and possible further decline as families face credit problems into the future. The rate of high cost loans with high leveraging varies, running from 13.3% to as high as 20.7% in the identified census tracts. High cost loans with low leveraging runs even higher, up to 25.9 % (HUD Data Sets; see following map). Fulton County

seeks to address this trend for those seeking to qualify for the NSP2 program through education and credit repair services facilitated by Metro Fair Housing. A dedicated staff person will be assigned to a one-stop-housing shop in the target area.

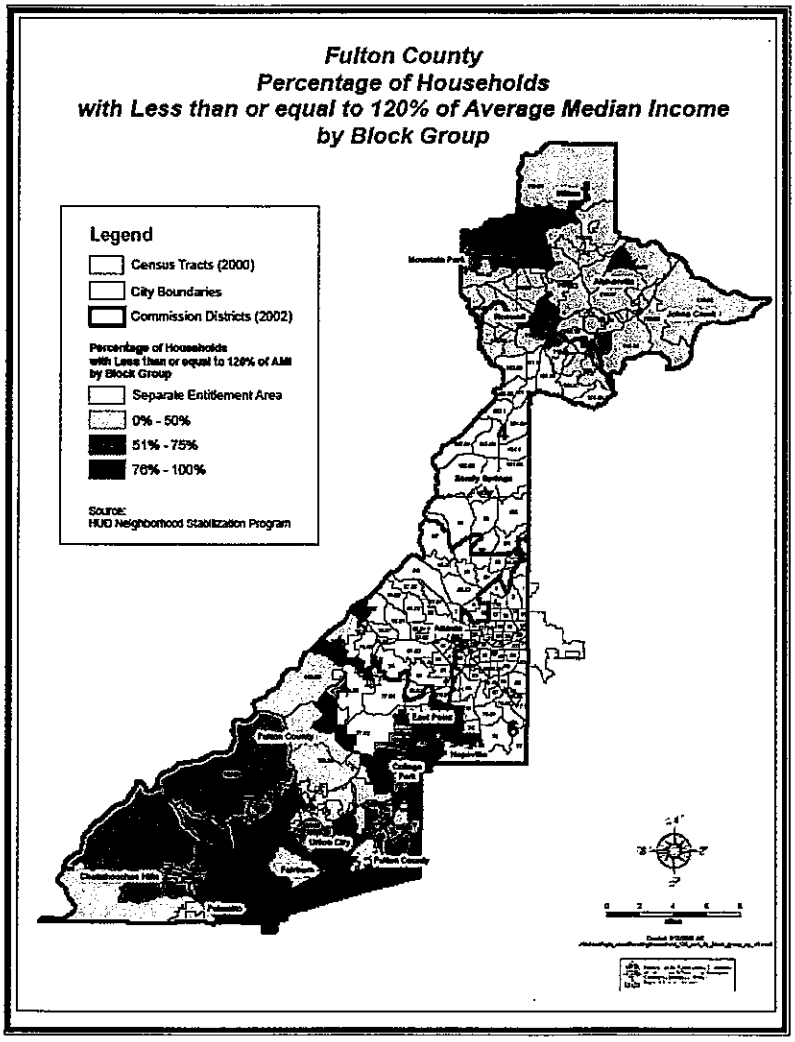


Employment and other Socio-economic Issues:

The 12 census tracts in this proposal have been greatly affected by the economic downturn and are targeted for assistance through NSP2. Many residents are coping with life below the poverty level. Female headed households are hit hardest, with 28.8% of those with children under 5 living below the federal poverty level in some areas of the targeted census tracts. In these areas, 14.8% of individuals live below the poverty level (American Community Survey, 2007). Forty-six percent (46 %) of the homebuyers in zip codes 30213, 30291, 30296, 30337, 30349 spend 30% or more of their household income on housing (U.S. Bureau, 2000). Title I schools are another indicator of poverty and community deterioration. There are four Title I elementary schools in one small area of the targeted geographic area, demonstrating the need for stabilization. Unemployment is also on the rise in the targeted geographic area, with 6.4%

unemployment, up 1.6% from the previous year (HUD Data Sets). However, recent economic news has been even bleaker, showing Georgia's Unemployment rate now at more than 10%, the highest since the great depression. Given the socio-economic conditions in the targeted geographic area, unemployment is now far more than recent records indicate. According to the MacAuthur Foundation, studies consistently show that in bad economic times, families suffer higher degrees of family violence, divorce, unpaid child support, health deterioration and more (MacAuthur Foundation). Financial distress for this geographic area is further exemplified by the increase in people seeking assistance from workforce development. In May of 2008, only 99 people sought assistance, as opposed to 161 people from these zip codes who sought assistance in September of 2008, the beginning of the economic decline. Fulton County Workforce Development staff report growing numbers in 2009, exceeding previous years.

All of the indicators, foreclosures, credit issues, poverty rates, Title I schools, and unemployment rates combine to create a decline in neighborhood stabilization. The weakening economy has further exacerbated the challenges, forcing attention on what was once an area slated for increased development but has now become peppered with blight (see following map).



b. Market Conditions and Demand Factors

(1) Projection of the extent to which market is likely to absorb abandoned and foreclosed properties through increased demand

According to the Multiple Listing Service's April 2009 report, the average number of days on the market for a new, detached home in the affected areas of Fulton County was 120 days. The number of days for resold homes was less, at 84 days. Similar numbers are found throughout the region; however, market and employment conditions worsened in the weeks that followed and the expectation for absorption of foreclosed homes is considered to be far less than that of new homes or normal re-sales. One of the reasons for this lowered expectation is the loss of population and reduced employment.

In reviewing data on the absorption of foreclosures, it was noted that these properties are far more difficult for the community to absorb. Of the more than 3,000 foreclosures listed on the HUD Data Set, only 49 properties were sold in April, 2009 (Data Intelligence Corporation). This trend demonstrates an extremely low potential for the market to absorb these abandoned and/or foreclosed properties.

While robust job growth was in previous forecasts, economic conditions have changed rapidly and those predictions may no longer be as solid as they were. According to the Georgia Department of Labor, Fulton County, including the City of Atlanta, employment growth was predicted to be 0.74% at the end of 2008. Since that prediction, the Georgia Department of Labor suggests that this prediction is now too high. It is also important to note that the economy for Fulton County is not growing as fast as Georgia's overall. It is growing at essentially the same rate as the nation's economy. Area job growth is expected to be 1.2 percent per year, while the state of Georgia's job growth is expected to be 1.7 percent per year (Georgia Department of Labor, Georgia Workforce Trends).

South Fulton County, the geographic location of the targeted census tracts, suffers from higher job layoffs, partially as a result of the closing of the Ford manufacturing plant in 2007. Economic fallout from that loss is intensified by the current overall economic climate, making it more difficult for neighborhood stabilization. While workforce trends may have been projected to rise by 2014, current and immediate economic conditions have worsened since those projections.

In February of 2009, the Atlanta Regional Commission published a Regional Snapshot of employment estimates entitled *The Brewing Storm*, signaling tough economic times ahead and reporting anemic job growth. Employment estimates for Fulton County from 2000 – 2008 were down 4%. The 20 County Region added only 12,000 jobs between the first quarter of 2006 and the first quarter of 2008, compared to the 1990's when the region added approximately 55,000 jobs per year. Compared to one year ago, metro Atlanta's employment declined 3.3 percent in December 2008, more than the two percent decline nationally and the 0.9 percent average decline seen in the 13 other similar sized metro areas analyzed.

Making matters worse, the slow job growth was found primarily in low paying jobs, not sustainable or growth areas. In 2008, fewer than 24 percent of all jobs in the 20-county region were in the top five highest-paying sectors. Between 2006 and 2008, however, the region lost about 1,700 of these jobs. In contrast, the region added nearly 24,000 jobs in the five lowest-paying sectors. (Atlanta Regional Commission)

Further complicating the hope for market absorption of property is slower population growth and outward migration from Fulton County. Most in and out migration occurs among 20 counties in the metro region. Of the regional migration, Fulton County lost 69,610 people from 2000 – 2006, one of only four of the 20 counties to lose population to other counties. The Atlanta Regional Commission also noted that a ten county metro region posted the lowest annual population gain between April 2007 and April 2008 since 2003. Population growth was down 16 percent from this decade's annual average (Atlanta Regional Commission).

Current conditions certainly do not warrant market absorption. However, with the focused social, neighborhood, public safety, and other services provided by Fulton County, along with increased funding from NSP2, these conditions will be reversed and housing absorption will increase in the market. The focused services are a new part of Fulton County Government, using a comprehensive approach to neighborhood stabilization through public policy will increase the value of any cash investment. The economic viability and health status of a community are intertwined. Research shows that communities with a low threshold of home ownership also have low health status. Environmental attributes such as walking trails, parks and recreation are essential elements that have a major impact on resident's health problems such as obesity, hypertension, diabetes, cardio-vascular disease and others. These issues and more will be addressed through Fulton County's comprehensive approach to these neighborhoods.

(2) The extent to which over-building of housing units, over-valuation of housing, or loss of employment is critical factor causing abandonment and foreclosure

Given the current economic conditions and worsening housing market, it is unlikely that normal market absorption will make a marked difference in removing neighborhood blight through the purchase of foreclosed homes. The critical factors that created the conditions in the neighborhoods of the targeted geographic areas of Fulton County are a confluence of all the issues discussed above, coupled with over-zealous housing development, over-valuation of properties and the weakened economy. The loss of employment and reduced incomes, coupled with over extended mortgages, (noting that this area contains higher percentages of high cost loans) created the blight that is prevalent today. There are a number of completed or partially completed subdivisions of single-family homes throughout all areas of Fulton County that have been foreclosed upon or are in the process of foreclosure. These properties not only threaten the investment of those who purchased their homes in these subdivisions prior to the downturn, but also existing property owners whose values have plummeted because of the glut of available properties at low prices and the blight that has resulted from their neglect.

(3) Income characteristics

There are five zip codes (30213, 30349, 30296, 30291, 30337) represented in the twelve census tracts chosen for this project. The mean household income (based on median household incomes for each zip code) is $40,995, compared to a median household income for Fulton County at $71,700. The percentage of families living below poverty is listed below for each of the five zip codes. The national average for families living below poverty is 9.2% (Brainy Zip).

Zip Code	Percent of Families Below Poverty Level
30349	9.9%
30213	5.3%
30296	4.8%
30291	9.2%
30337	19.1%

In Fulton County, approximately 11% of households with incomes at or less than 50% of the median household income pay more than 30% of their income toward housing costs. Roughly 8% of households with incomes between 50% and 80% of the median household income pay more than 30% of their income toward housing costs. More than 18% of households with incomes between 80% and 120% of median income pay more than 30% of their income toward housing (U.S. Census Bureau). These numbers are far more concerning for the targeted geographic area, as noted below.

4.) Relevant social, governmental, educational, or economic factors contributing to local market conditions and neighborhood decline

A strong indicator of the poor social, educational and economic factors contributing to the high foreclosures in the target geographic area can be seen by the high numbers of individuals going to Consumer Credit Counseling (a nonprofit agency) for counseling about foreclosures. From January through May of 2009, Consumer Credit Counseling assisted 568 new individuals from unincorporated South Fulton County with foreclosure problems as their main issue compared to only 393 for the entire year of 2007 (Graham Haer, Grants Coordinator, Consumer Credit Counseling).

According to Fulton County Workforce Development, 1,380 individuals from South Fulton County sought assistance from October 2008 through May 2009. These individuals were displaced workers seeking assistance finding new work, however only 57 of them were successful in doing so. Companies such as Leviton Manufacturing Company, Aramark, Wilen Industries, Owens Corning and Air Springs all experienced layoffs and affected approximately 802 people from January through May, 2009 in the target area.

The targeted geographic area has very low incomes, with 23% living below poverty level and 12.4% living on less than 50% of the federal poverty level. The average salary for the area is $26,693 (City Data) and conditions continue to worsen. There is a high proportion of disabled

residents in the area, with nearly 24% of those between the ages of 21 and 64 reporting some disability, as opposed to only 19% for the nation overall (Brainy Zip). A concentration of poverty has collected in the area, complete with crime and homelessness making the entire area one in need of the focused attention proposed in this application.

The factors discussed above, especially declining employment and low incomes are detrimental to these communities. The loss of the Ford manufacturing plant is a major contributor to unemployment in the area. The growing number of foreclosures are a result of many factors coming together to create the perfect storm.

(5) Activities most likely to stabilize the area

Based on previous experience, projected absorption rate, and signs of economic recovery, the best chance of neighborhood stabilization will be to create homeownership opportunities for new homeowners who qualify with incomes 120% or less of median income. By taking the first steps in acquiring and rehabilitating foreclosed housing, it will become attractive to new home buyers and give neighborhoods the best chance at becoming stable by replacing empty, abandoned housing with owner-occupied housing.

Fulton County recognizes that homeownership is not feasible for all families or suitable for all properties. Therefore, as an additional homeownership component to this application, long-term rental of NSP2-assisted properties is also planned. Utilization of acquisition and rehabilitation for long term rental will also help to stabilize the area and the availability of quality affordable rental housing. Through collaborative efforts with faith-based, non-profit, community housing development organizations and other affordable housing entities citizens will have a support mechanism to assist them in becoming self-sufficient and economically viable thus further contributing to the stabilization of targeted neighborhoods.

Recognizing the severity of the housing crisis, rate of foreclosures, and the need to stabilize the negative effects in Fulton County, the County has proactively responded by establishing a one stop housing office at the South Fulton Service Center. This office is located within the targeted southern region of the County where both foreclosure and vacancy rates are high. This office is designed to provide immediate access to housing counseling with the ultimate goal of adding an additional stabilizing element. This office will include a HUD certified housing counselor to assist with all housing counseling issues. The office will further serve to assist with housing rehabilitation, down payment assistance, and information on credit repair and foreclosure prevention. Fulton County in cooperation with Metro Fair Housing (HUD certified housing counseling agency) has enlisted a permanent employee to be housed at the one stop shop to deliver these services. Atlanta Legal Aid has also agreed to have a staff person present one day per week. This concept is being closely monitored and discussions regarding the opening of another office in target areas located in the northern portion of the County are currently being discussed.

RATING FACTOR 2: DEMONSTRATED CAPACITY OF THE APPLICANT AND RELEVANT ORGANIZATIONAL STAFF

a. Past Experience of the applicant

Fulton County, through the Department of Housing and Community Development has a strong history of providing owner-occupied housing rehabilitation and deferred payment loans utilizing Community Development Block Grant (CDBG) and the Home Investment Partnerships Act (HOME) Program funds. The work defined for this project is acquisition, rehabilitation and return to market of foreclosed and abandoned properties. Fulton County has many years of experience doing this work in various capacities, both as a funder of local nonprofit housing developers and as the "developer" itself. For example, from May 4, 2007 through the end of that year, Fulton County provided 83 households with emergency assistance grants with CDBG funds to address housing code violations. In that same year, three homes were fully brought into Code compliance with HOME funds for their owner-occupants. In 2008, Fulton County completed the rehabilitation of 58 single-family owner-occupied homes with CDBG and HOME funding and also provided HOME funds to two CHDOs for acquisition of a total of eight single-family housing units to be leased or resold to income-eligible households for long-term affordable housing. The operation of this activity requires program skill sets identical to what is needed in NSP2-funded projects.

Staff overseeing these projects are thoroughly knowledgeable of developing work write-ups, budgeting construction cost, monitoring for code compliance, implementation of a construction bid process, public notice requirements, income eligibility determination, title search, housing counseling, program marketing and management of waiting list.

These skill sets have been beneficial in Fulton County's efforts to focus heavily on the most "unstable" areas of the County. One method of addressing this was by providing specific attention to geographic and human needs through the formation of Common Ground, a new initiative within Fulton County which brings departments together to solve community problems. Common Ground uses a multi-disciplinary approach to the County's most serious problems, often stemming from inequities in incomes, health, and educational status. Projects that affect these disparities such as neighborhood stabilization activities, as proposed in this application, are considered high priorities.

This application seeks to mitigate negative factors influencing the target geography by renovating and returning to market foreclosed and abandoned properties. Fulton County is fully capable of this work through its decades of experience in acquiring and rehabilitating single family homes. Other experience in regional planning comes from a full history of working closely with other Metropolitan Atlanta cities and county governments to address regional issues including transportation, environmental resource management, workforce development, aging, and housing and homeless issues. Fulton County also works cooperatively with other organizations, including local nonprofits and community leaders. For decades, Fulton County

led the way in Georgia and the Southeast, providing a model for competitive human service grants. (DeKalb County recently created a similar program, modeled after Fulton County's) Managing a competitive proposal process of more than $4,000,000, Fulton County has been recognized internationally for this work. Strong relationships have been forged with the nonprofit human service providers involved in the grant competition, further demonstrating Fulton County's ability to work well with other organizations.

Other evidence of Fulton County's experience with city and regional planning include new developments of neighborhood service centers. One of the projects recently completed by Fulton County is the Neighborhood Union Health and Community Center. The Neighborhood Union Health Center was created in response to the results of a study conducted in 2008 by the Georgia Division of Community Health which looked at the major factors that influence differences in health status and their relationship to racial and ethnic characteristics. Alarmingly, the results reported in *Health Disparities Report 2008: A County-Level Look at Health Outcomes for Minorities in Georgia* indicated that minority health significantly lagged behind the general population in the area of illness events, birth outcomes, health care access, mental health care access, dental health care access, and health insurance coverage. These results underscored the need to create one-stop shop comprehensive health care centers for this population. The location of the Center is in a high-crime and high risk drug area with a population that includes a large number of homeless individuals as well as those who are mentally ill. The Center provides comprehensive services including primary care, mental health care, and substance abuse treatment to those in the Vine City Community (a bit north of the census tracts that we are focusing on for this grant) as well as workforce development. It allows individuals in the community to go to one centralized location to receive a variety of health services. Fulton County used many partners to create the Neighborhood Union Health Center, further demonstrating the ability to work with diverse organizations. In light of the success of this initiative a feasibility study was completed for a similar center in the North Fulton area, and in the Adamsville Community in the City of Atlanta.

b. Management Structure

1) Description of management structure

The methodology for achieving neighborhood stabilization will involve the Common Ground approach which consists of a team of planners, analyst, researchers, GIS personnel, housing evaluators, and policy analyst. The actual management structure (program implementation and administration) will include four full time dedicated NSP-focused positions (Please see organizational chart on page 21). Note that the internal audit position is one of the key positions that reports to the NSP manager.

To ensure compliance with all HUD requirements the Director of Housing and Community Development will be responsible for the oversight of all aspects of the Neighborhood Stabilization Program and its administration. This includes financial management, procurement, reporting, and meeting all commitment and expenditure deadlines.

Daily operations will be performed by five staff members from the Department of Housing and Community Development.

Community Development Manager

- Provide daily oversight of all NSP activities
- Oversee the development and finalization of legal documents
- Monitor project implementation schedules
- Oversee the development and implementation of a complete Marketing Plan
- Monitor financial transactions and reports
- Resolve potential impediments to project completion

Community Development Specialists (3)

- Conduct work with development partners on site identification and acquisition
- Provide portfolio management activities
- Conduct Monitoring and Compliance
- Develop contracts and legal agreements
- Oversee development and program marketing
- Oversee project development, construction monitoring, and property disposition.
- Process payments to vendors, receipt of program income, day to day fiscal management, and financial reporting to include use of the Disaster Recovery Grant Reporting system

Senior Housing Inspector

- Identify potential sites
- Assist in the development of the scope of work
- Monitor site progress
- Coordinate inspections

Inspectors from Code Enforcement, Department of Environment and Community Development

County Code Enforcement from the Department of Environment and Community Development will perform inspections of potential Neighborhood Stabilization project sites. In addition to a Senior Housing Inspector currently employed within the Department of Housing and Community Development, the program will have the assistance and expertise of eight certified building and trade inspectors allocated from the Department of Environment and Community Development. Current certifications held by the inspectors include Certified Lead-Based Paint Lead Inspector and Risk Assessor, Mold Assessment and Remediation, Residential Housing Rehabilitation and Preservation Inspection, Design and Specification, Rehabilitation Management, and Cost Estimation.

County inspectors will work closely with development partners to complete scopes of work for single and multi-family properties that have been acquired. The inspectors will conduct lead-based paint testing and develop risk assessments as required.

Attorneys from the Office of the County Attorney

Staff Attorneys in the County Attorney's Office will provide legal assistance for the County's NSP Program. The County has already begun the process of developing legal documents for properties previously acquired or to be assisted with HUD funds in the future. These documents will be used throughout the period of affordability as determined by the project subsidy. The County Attorney's office is also developing agreements with development partners. These agreements will include HOME compliant language and will be consistent with all HOME Program requirements. The documents will further secure the County's investment and be drafted with specific timeframes and deliverables for each property.

Appraisers from the Tax Assessors Office

Appraisers from the County Tax Assessor's Office who have extensive property appraisal experience have been assigned to work with the County's NSP Program. The appraisers will conduct property valuations and area assessments prior to any expenditure of funds for acquisition of a foreclosed or abandoned property. Due to the volume of properties to be acquired, in may be deemed necessary to secure the services of private appraisers. The County is prepared to procure additional appraisal services to expedite acquisition transactions if needed to meet program commitment and expenditure deadlines.

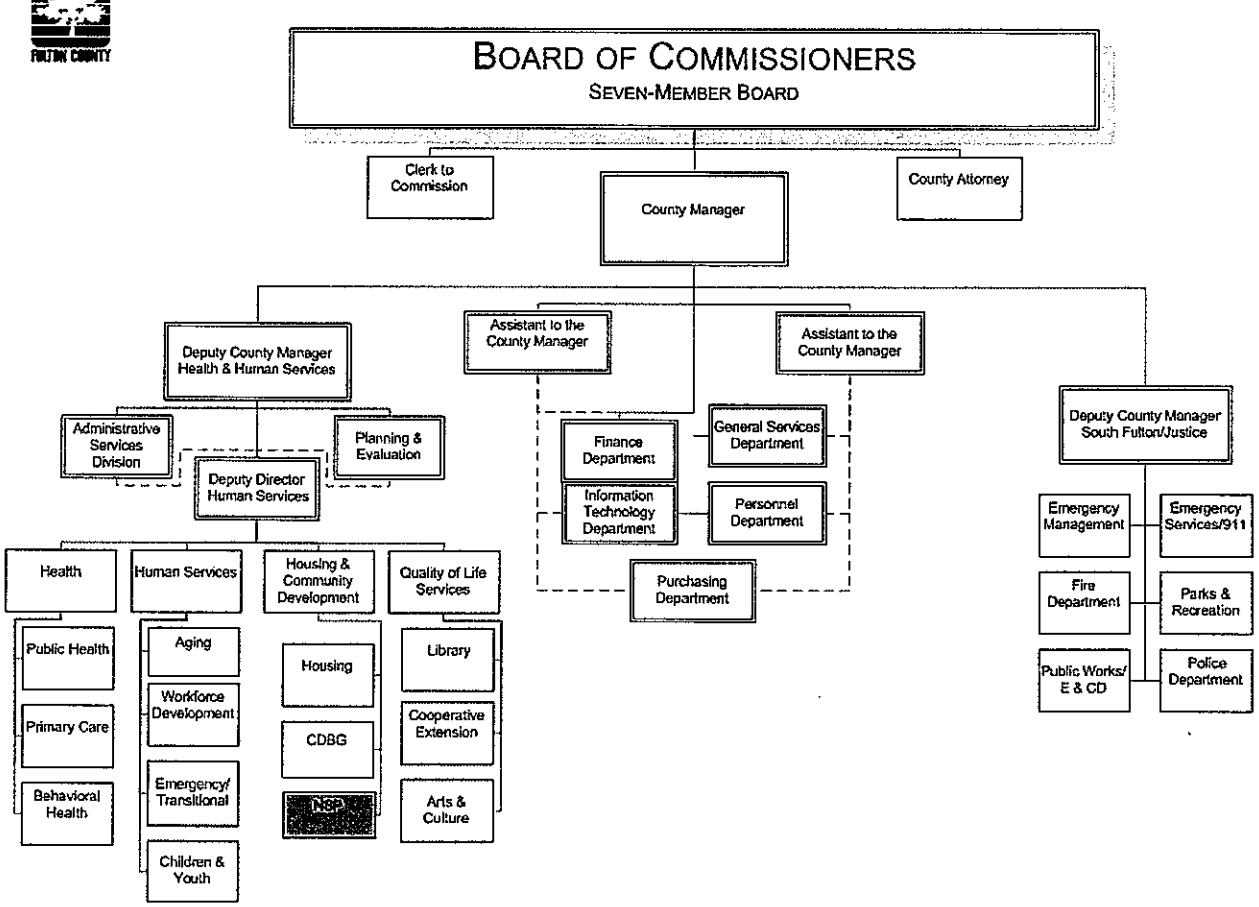
Financial Analysts from the Finance Department

Financial management and oversight of the Neighborhood Stabilization Program and its expenditures, revenue and reporting is primarily the responsibility of the Community Development Manager and the Community Development Specialist for NSP Financial Reporting. Housing staff will also coordinate with financial staff located within the larger umbrella of the Fulton County Health and Human Services Agency, of which the Department of Housing and Community Development is a member. In addition to this added layer of financial compliance and oversight, the County Finance Department's Grants Management Section will also track commitments, expenditures and all draws-down of NSP funds. Finance Department staff members who have been assigned to assist with the NSP will review all entries into the Disaster Recovery Grant Reporting (DRGR) information system for accuracy and reconcile all NSP accounts on a monthly basis with the Neighborhood Stabilization and Financial Reporting Sections.

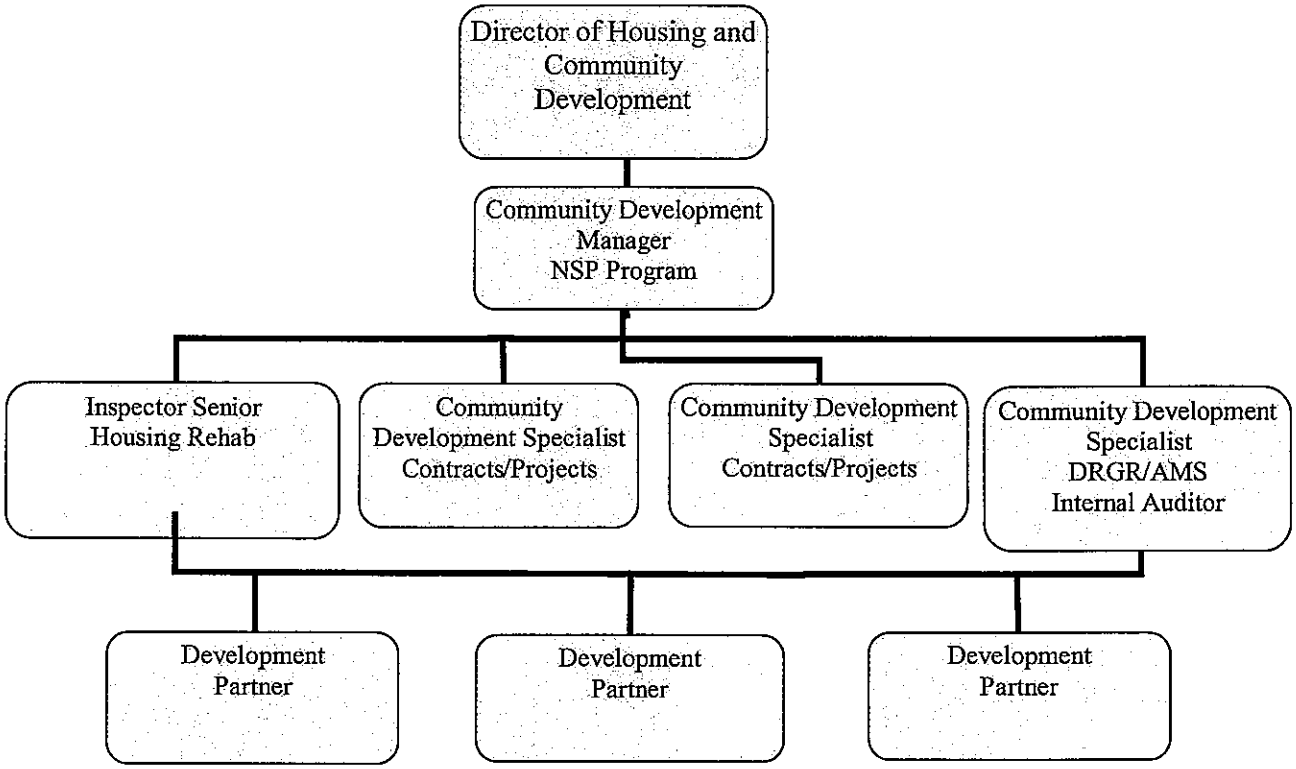
Auditors from the Internal Auditors Office

Staff from the County Office of Internal Audit will provide oversight and review of all reporting requirements specific to program compliance. Auditors will ensure compliance with local, state and federal regulations and ensure that proper documentation and supporting data of efforts is in place and retrievable. Staff form the Auditor's Office will review, no less than quarterly, all project records and program management procedures to ensure compliance with established program policies and HUD requirements.

FULTON COUNTY GOVERNMENT ORGANIZATIONAL STRUCTURE



ORGANIZATIONAL CHART FOR
NSP 2 PROGRAMMATIC FUNCTIONS
COMMUNITY DEVELOPMENT DEPARTMENT



(2) References

The following two references are contractors recently used in similar programs.

Walter Reid
WCR Enterprises
3662 Salem Drive
Lithonia, GA 30038
wcrent@hotmail.com

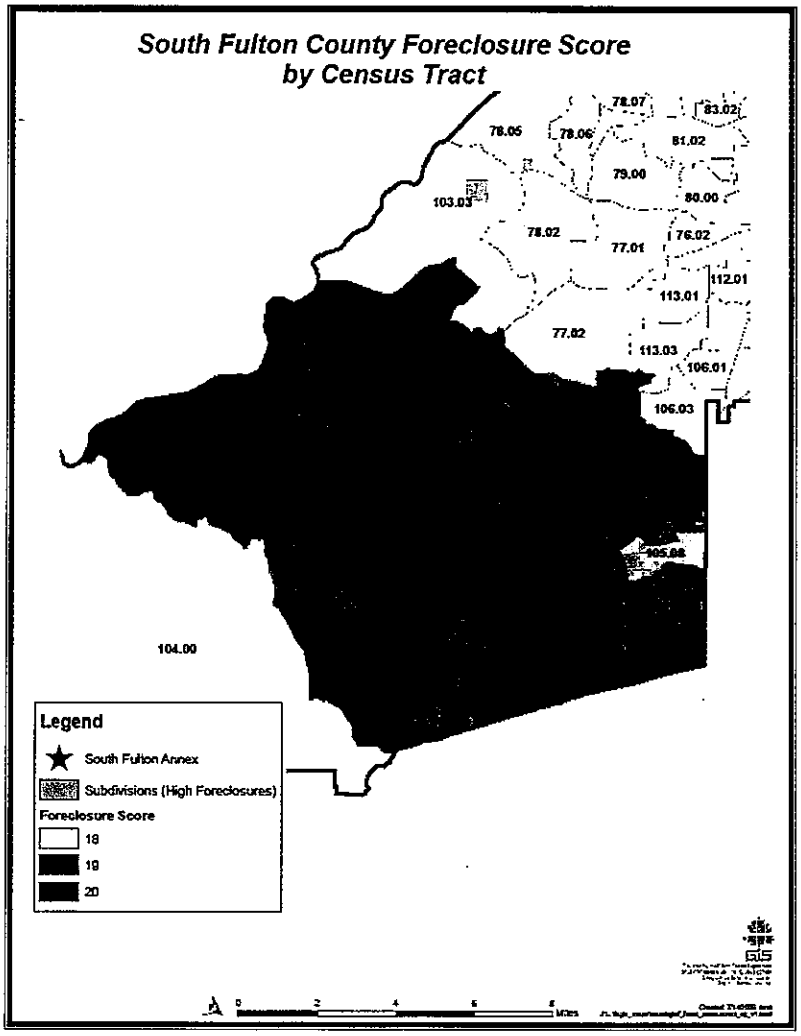
Brunetta Nelson
D'BABS Construction, Inc.
2692 Harris Street
East Point, GA 30344
brnelson@bellsouth.net

RATING FACTOR 3: SOUNDNESS OF APPROACH

a. Proposed Activities

(1) Overall neighborhood stabilization program including coordinated components not funded with NSP

Fulton County has leveraged its resources to implement a simplified streamlined process to the implementation of its Neighborhood Stabilization program. Utilizing a one-stop-shop approach, Fulton County's Neighborhood Stabilization Program (NSP2) will build and expand upon the current NSP1 program implemented through HERA as well as support services currently being offered by the County through its Human Services and Housing Departments. In an effort to maximize resources, strategic neighborhoods (areas of focus) have been targeted as shown in the following map. The South Fulton Service Center will serve as the hub for Neighborhood Stabilization allowing citizens access to assistance. The radius of affect properties is no greater than ten miles from the South Fulton Service Center. An example of such a neighborhood is Wexford which has a foreclosure and vacancy rating of 20. This neighborhood is located within one mile of the Service Center.



In addition to the acquisition and redevelopment of Real Estate Owned properties (REOs) in all high-foreclosure areas, Fulton County has a targeted strategy for Foreclosure Intervention which brings together through the Common Ground approach Health and Human Services, Police, Public Works, Transportation, Inspectional Services, Parks, Economic Development and Housing and Community Development to deliver a coordinated reinvestment strategy to revitalize highly targeted areas where REO properties are most concentrated. Public improvements to streets, sidewalks, and open spaces, along with targeted law enforcement to prevent crime from taking root in vacant properties, combined with strategic code enforcement and receiverships against privately-owned distressed properties creates a comprehensive revitalization effect.

The profusion of foreclosed properties in South Fulton County underscores the need for acquisition, rehabilitation, and sale of foreclosed and abandoned properties. These activities are at the heart of the efforts to stabilize this neighborhood; however, foreclosures are only part of the problem. Fulton County analysts note that foreclosed and abandoned homes are symptomatic of other issues that plague South Fulton. For example, unemployment, poverty, criminal activity are high.

A complex problem requires a complex solution. Therefore, Fulton County plans to leverage existing County resources to revitalize the blighted areas of South Fulton County through integration of NSP 1&2 with the County's Common Ground Initiative. The integration of these two initiatives frames the Neighborhood Stabilization approach which will encompass six focus elements:

- Home acquisition, rehabilitation, and down payment assistance (NSP2 activities)
- Economic Growth
- Physical Environment
- Safety
- Health
- Quality of Life

Neighborhoods that have an array of socio-economic opportunities, strong business and industry, affordable housing, shopping centers with restaurants, cultural activities, theatres, playgrounds, good transportation, parks, walking trails, enhanced street lighting, and public safety foster long-term sustainability. Planners, analysts, housing, and grant personnel have triaged the area using smart growth principles to identify strengths, weaknesses, opportunities, and threats. From this information a plan and implementation strategy for continued improvement will emerge.

In addressing the destabilization of neighborhoods and families in our community, Fulton County is well postured to bring the full force and effect of its governmental powers to bear. Fulton County has adopted a framework for addressing the heath and well being of its residents through: "Common Ground: Creating Equity through Public Policy and Community Engagement.

Utilizing the NSP2 eligible activities of acquisition, rehabilitation, and down payment assistance, properties will be prepared for resale to qualified buyers. Parallel to the activity of acquisition,

rehab, and resale, Fulton County's Common Ground approach will prescribe and implement strategic quality of life elements which would further lend to the stability of South Fulton County.

Acquisition, Rehabilitation, and Sale of Foreclosed and Abandoned Properties

Activities proposed in this application include stabilizing neighborhoods through the acquisition of 120 foreclosed and/or abandoned properties, renovating them, and reoccupying them with owners or renters. The County will focus its efforts in those neighborhoods with the greatest need and highest concentration of foreclosed properties in order to maximize the impact of the program. Emphasis will be placed on specific neighborhoods and not scattered sites.

The use of NSP2 funds will complement the County's NSP1 activities by providing funding to acquire and rehabilitate additional units. Because of the enormity of the problem in the target geography, the County anticipates that projects completed with NSP2 funds will greatly help to stabilize the housing market in those areas. This will be achieved through a decrease in the number of vacant properties and increased property values for existing residents as progress begins to occur. In combination with other public and private recovery efforts, it is expected that these efforts should lead to enhanced stabilization within six months after the completion of successful projects has begun.

Additional activity includes providing qualified homebuyers with down payment assistance at $7,500 per purchase. This allowed expense assists with stabilization efforts and provides further assurance that new owners will remain in good standing with respect to their mortgages and be fully capable of managing the loan and the property. Housing counseling/credit repair for the target area which will be located in the center of the five mile radius (South Fulton Service Center) will also be provided for home buyers furthering the stability and outcome for long term homeownership.

Economic Growth

One of the other characteristics of a community is its economic well-being. This is related to the growth and decline of industries that provide job opportunities for the residents. Communities with strong industry yield vibrant and self-sustaining neighborhoods. Communities that lack industry support have decaying infrastructure and usually have transient residents who do not offer stability for a community. The economic health and viability of a community are intertwined. The very essence of community and neighborhood survival relies on strong industries that employ residents.

Policies relevant to economic development must address partnerships with the business community and Fulton County government to employ residents. A major factor as to why a corporation relocates is based on the availability of a skilled workforce. A strong partnership between local planners, economic developers and workforce development must exist to ensure that a trained labor force is ready for the new industry. People who have good paying, stable jobs and own their homes have a better chance of losing their homes to foreclosure.

Economic Empowerment for Residents: Fulton County has made investments in the target area of South Fulton which will support economic development within the designated boundaries. These investments include a local housing office which has been set up in the center of the five mile radius target area to assist people with housing counseling and credit counseling. The Office of Workforce Development also has established two service delivery hubs in the area to arrest the issue of rising unemployment. The Youth Employment Center coordinates a year-round comprehensive youth training and employment program which expands workforce opportunities for youth. This program encourages leadership and independent thinking, and assists youth with assessing and accomplishing their educational and career goals as well as fulfilling their personal potential. The South Fulton Career Center provides career counseling and job search services to both youth and adults.

Commercial Economic Development: Fulton County supports restoring the vitality of South Fulton through support of commercial and small business development. The Fulton County Development Authority will continue to provide financing and other services which promote the establishment and growth of businesses and institutions. The Development Authority has a program of innovative and competitive incentives to attract businesses to the target area thus continuing stabilizing efforts.

Physical Environment

To maintain and encourage environmentally sound industrial, residential, and commercial uses, the Common Ground Initiative will work with the Department of Public Works to identify potential Brownfield opportunities and to create clean-up measures and code compliance which supports a healthy physical environment. The County is prepared to enact policy which supports the desired outcome. We will strive to build walking trails and improve other recreational opportunities. Code enforcement will be utilized to maximize the effects of the investment so that properties will not lose value and neighborhoods will be more attractive.

Safety

The Fulton County Sheriff and Police Departments will enhance public safety through coordinated enforcement. The Sheriff and Police Departments will conduct enforcement sweeps within target neighborhoods to reduce the occurrence of criminal activity. As an added measure to create community engagement and long term stabilization, technical assistance will be provided for neighborhoods wishing to form "Neighborhood Watch" programs.

Health

There is a distinct relationship between social and environmental conditions with which an individual lives and his or her health status. These Social Determinants of Health (SDH) are essential factors and resources that contribute to or detract from the health of individuals and communities. This phenomenon has long been accepted by scientists, practitioners and policy makers. Examples include, education levels, income levels, access to essential services, built environmental conditions such as proportion of abandoned homes and crime levels. Furthermore, there exists an inequitable distribution of the SDH in question which has a significant influence on persistent health disparities in our most underserved communities, which include the target geographic area.

It is the goal of the Common Ground Initiative to address health disparities within the targeted neighborhoods. Through systematic analysis utilizing the Common Ground Approach, recommendations will be made to the Fulton County Department of Health and Wellness so that strategic targeting for improved health outcomes can be formulated. Discussions are currently underway concerning the development of a public health facility near the South Fulton Service Center. In addition to establishing a Housing Assistance Office at the South Fulton Service Center which is staffed by experts prepared to assist residents with housing related issues, a Housing Crisis Hotline has been developed in conjunction with the Fulton County Department of Mental Health/Developmental Disabilities/Addictive Diseases. Mental Health professionals are on call to help individuals who are affected by the stressors of losing one's home or facing the possibility of foreclosure.

Quality of Life

Fulton County is home to a diverse population. Citizens within the target group of 120% below Area Median Income experience systemic barriers to participation and access to services based on gender, sexual orientation, ethnicity, race, language, culture, age, and economic status. Addressing social inclusion requires building community partnerships and working collaboratively with the community sector to tap into the expertise and services required to strengthen the voice and power of marginalized groups. Promoting social inclusion builds healthy and safe communities increasing the quality of life for both staff and tenants. Social inclusion contributes to community cohesion (Guetzkow, 2002).

Investment in the Arts: Arts-integrated school curricula have been reported as improving academic performance and student discipline. The arts revitalize neighborhoods and promote economic prosperity. Participation in the arts improves physical and psychological well-being. The arts provide a catalyst for the creation of social capital and the attainment of important community goals. As documented the Arts are an important element in fostering community development and quality of life. The Fulton County Arts Council (FCAC) is partnering with South Fulton neighborhoods, to bring a number of arts programs to communities in South Fulton County to harness the power of the arts and focus and create new arts programs. FCAC will oversee the development and implementation of publicly assisted programs that address the diverse cultural needs of Fulton County's citizenry. Fulton County will further encourage artistic inclusion and home acquisition by qualifying members of the art community.

Investment in Human Services: The Fulton County Health and Human Services Agency has committed $521,000 in human service funding to 18 nonprofit human service providers within the target neighborhoods. Those funds make a greater difference in reducing the immediate social service needs of the residents of this neighborhood. Fulton County has established reciprocal agreements with these community-based nonprofits agencies whereby as a condition of receiving funding from the County, the agencies must provide services to South Fulton residents. A few samples of some of the human service agencies funded to serve the South Fulton area include:

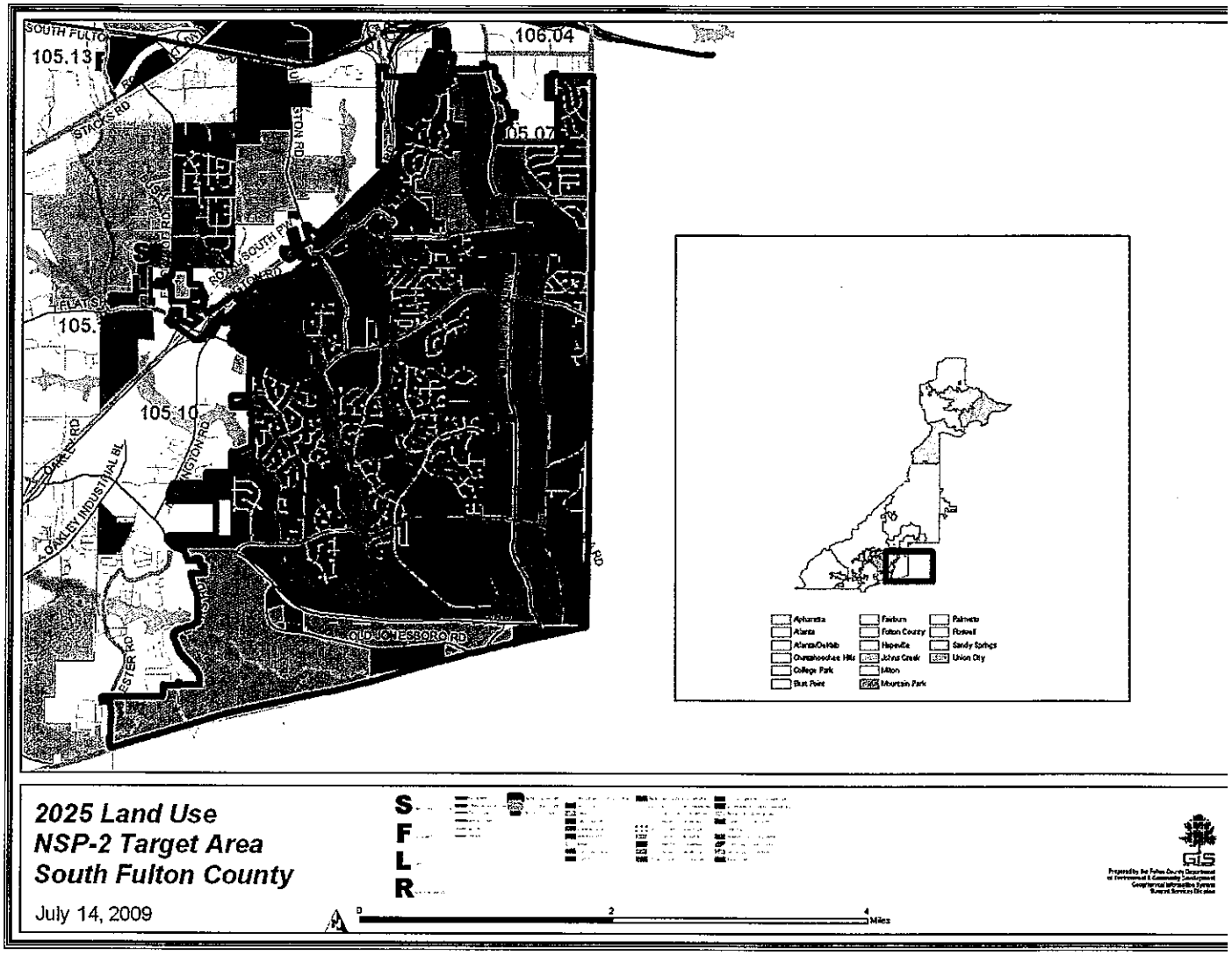
- Upward Connection Inc. teaches residents to grow their own urban vegetable gardens in an effort to foster healthy eating and overall good nutrition.

- Spectrum Technical Institute shapes and provides training; image, interpersonal and career development and entrepreneurial pursuits to positively impacts the lives of "at-risk" youth, young adults and others in the South Fulton area.
- Quality Living Services seeks to empower and serve the senior population of South Fulton using a self-help program of seniors helping seniors to remain independent and productive community members.

Intergenerational Communities

As another innovative approach to neighborhood stabilization Fulton County will establish its first Intergenerational Community. Many grandparents raising grandkids cannot afford the cost of housing in the current market. Through neighborhood stabilization, income eligible grandparents will be encouraged to acquire properties located within the target neighborhoods where supportive services/infrastructures exist. The target area for this pilot venture will be census tract 105.09 which is strategically positioned in proximity to the Old National Highway commercial and transportation corridor (see purple area in the following map for location of the Old National Highway Corridor).

Essential to any livable community is that it has the resources necessary to support residents like grandparents raising grandchildren (GRG) and other families. Best practice programs and services have been developed across the nation that are directed at supporting GRP's in a one stop community center environment. This community resource is an intergenerational resource center. These centers will help to enhance the neighborhood and create livable communities for grandparents and other residents. The centers will include all of the social determinants services that help families to achieve a better socio-economic status and improve health outcomes.



With the increased activity in returning foreclosed and abandoned homes to market, coupled with the increased human service activities, and a full focus from all aspects of Fulton County Government, the geographic area will become stable.

(2) Uses of funds and responsible entity

(a) Table showing use of funds

Activities	Estimated Amount	Responsible Entity
Purchase of residential properties which have been abandoned or foreclosed upon, in order to sell or rent (Assumption: Costs are expected to range from $80,000 to $120,000 with a projected average of $100,000 per home for 120 units)	$12,000,000	Fulton County
Rehabilitation of residential properties which have been abandoned or foreclosed upon, in order to sell or rent (Assumption: Costs will vary based upon acquisition costs but an average of $12,500 per home for 120 units was used to derive this amount)	$ 1,500,000	Fulton County
Establish financing mechanisms for purchase (Assumption: Down payment assistance for 75 borrowers at $7,500 each)	$ 562,500	Fulton County
Provide housing counseling for 75 home buyers (Assumption: $250 per buyer)	$ 18,750	Fulton County
Activity Total	$14,081,250	
Administrative costs in accordance with 24CFR 570.206	$ 1,408,125	Fulton County
Total	$15,489,375	

The assumptions used in developing the budget are based upon available current data. Because home prices and fair market values are fluctuating due to the instability of residential markets, these values are likely to change. Assessments will be prepared for each home to be purchased to ensure that they will be affordable to households at or below 120% of median income as required by the program. Development partners have been selected to provide assistance for those requiring lease purchase and or rental assistance.

The average list price in the budget was derived based upon information on available foreclosed properties in the targeted areas received from the National Community Stabilization Trust. This inventory included almost 300 available properties through their bulk sale program with home values ranging from a low of $8,600 to a high of $332,900. The County felt that it was a good representative sampling of the current sales prices to use in developing the project budget.

Marketability and affordability will be the key factors that the County will use in its property acquisition strategy. The County will work closely with its development partners to determine after-rehab marketability for all properties designated for sale. If a property is appraised particularly low, factors such as quality of construction, home design, accessibility, transportation, schools, and other amenities will be considered to ensure that the home will be attractive to buyers who can qualify for the bulk of the financing needed for the purchase. For homes on the upper end, the same factors will be considered in deciding whether the home

would be attractive to purchasers. The County's foremost goal is to be sure that all properties designated for sale can be sold expeditiously to buyers and that program income will be maximized in order to allow for more units to be completed in the future. It is also the County's goal to minimize the holding time of each property and re-occupy them as quickly as possible after acquisition takes place.

In its ongoing Home Ownership Assistance Program, the County assisted a total of 43 homebuyers with HOME down payment assistance in 2008. The average purchase price of these homes was $125,913. This program was limited to those at or below 80% of area median income as it was HOME-funded. With NSP allowing assistance to buyers up to 120% of area median income, the County is anticipating that some higher priced homes will be purchased over the $120,000 figure. These will likely be balanced by purchases of homes below the $80,000 figure for use as either rental properties or for sale to households below 80% of area median income. As program implementation continues, the County will use the acquisition strategy which best appears to meet the needs of all interested program participants. For planning purposes, however, $100,000 was determined to be the appropriate average for all properties purchased.

Census Housing Data

CENSUS TRACT	ZIP CODE	FORECLOSURE SCORE	VACANCY SCORE	TOTAL UNITS	RENTAL UNITS	% RENTAL	% BELOW POVERTY	MEDIAN INCOME
103.01	30213	20	14	1250	232	20.42	2.26	$67,885
103.04	30349	20	14	1517	91	6.60	7.68	$77,580
105.07	30349	20	16	2718	1320	53.42	12.14	$47,077
105.08	30349	18	12	950	139	16.09	6.94	$58,965
105.09	30296	20	16	3212	671	22.98	6.95	$64,619
105.10	30213	20	16	2646	857	35.63	5.87	$61,117
105.11	30349	19	17	1643	517	34.61	11.14	$55,021
105.12	30291	19	19	2555	1570	67.59	10.83	$43,139
105.13	30291	20	19	2797	1048	41.22	13.08	$51,381
105.14	30213	20	15	1751	407	25.57	7.07	$53,962
106.04	30337	19	20	2214	1606	79.79	14.11	$42,482
113.04	30349	17	18	3818	2859	82.37	22.47	$33,195

The amount requested in the budget will be sufficient to acquire, rehab, resale, and provide downpayment assistance for a minimum of 120 units, although it is projected that this figure will be exceeded. The County will be aggressive in bringing back as much program income as feasible as projects are completed in order to do additional homes under the program. With the funds requested and the resulting program income, Fulton County expects to complete a minimum of 120 units under NSP2.

(b) Proposed activities including duration of assistance, tenure of beneficiaries, location

The County will enter into agreements with development entities to undertake projects with NSP2 funds. The County will work closely with its partners to identify eligible properties with the partner acquiring them at the required discount from fair market value as appraised no earlier than 60 days prior to the date of the sales contract. The initial focus will be to look at the availability of HUD FHA foreclosures as well as inventory available through the National Community Stabilization Trust and private lenders. With regard to HUD properties, it is anticipated that other development and financing tools can be used in this program including discounts available for properties in HUD's Revitalization Areas and through the Good Neighbor Next Door Program. No specific addresses have been identified yet.

Properties purchased and rehabilitated under the program will be used for both rental and homeownership. A minimum of 25% of the County's approved NSP2 grant will be used to house those at or below 50% of area median as required with the primary focus for this population to be rental units. The County will track the expenditure of these funds separately as projects are undertaken to ensure that this requirement is met. All rental properties will have affordability standards that conform with the requirements of the HOME Program that are secured through legal documents and the County will carry out ongoing monitoring to ensure these are met through the required period of affordability. For homeownership units, a policy will be developed that will outline how equity will be accrued by the buyer throughout the period of affordability in the event they cease to occupy the property as their primary residence and funds need to be recaptured. This will be incorporated into all liens that will be placed on these properties to secure the County's interest throughout the period of affordability. Deferred payment loans will be used to secure the NSP2 investment throughout the periods of affordability for each property. These will be 0% loans and forgiven on a pro-rated basis as outlined in the loan documents.

(c) Firm Commitments of Other Funds

The Fulton County Health and Human Services Agency has committed $521,000 in human service funding to 18 nonprofit human service providers within the target neighborhoods. The County plans to use HOME funding whenever feasible to provide down payment and closing cost assistance to purchasers of NSP2 properties. This would be provided through the current Home Ownership Assistance Program and would be limited to only those buyers at 80% of median income or less. Funding for this program is included in the County's HOME budget and prior year funds may be reallocated for this activity in the event they are needed based upon the demand.

(d) Demolition

Demolition is not an activity for which funding is requested under for this proposal. Other funds, including NSP1, are available for this if needed. Fulton County chose to focus on the preservation of housing units instead of demolition based upon existing market conditions. The majority of the housing units in the target geography are economically feasible to repair and using NSP2 funds to get them repaired and reoccupied is the County's highest priority.

B. PROJECT COMPLETION SCHEDULE (5 POINTS)

December 2009	Award announcement and grant agreement execution
December 2009	Identification of development partners; Fulton County reviews and sets any additional monitoring process needed to comply with all HUD reporting requirements; begin identifying 100 specific target properties
January 2010	Contractors chosen, detailed contracts between Fulton County and contractors are signed covering all HUD requirements; Provide monthly report; review all HUD required data sets and insure methods of collection and reporting are in place; follow HUD guidance on all reporting activities and continue throughout life of grant, including internal audits and monitoring, continue throughout duration of grant period
February 2010	Provide monthly report; begin draw down; Begin property identification process with development partners; program marketing to potential homebuyers and create process for buyer and rental waiting lists to continue monthly through June 2011 contract period
March 2010	Provide quarterly report by March 10, 2010; Hold at least 1 public information meeting in the target area, post work on website to solicit applicants for housing purchase or rental, prepare flyers, brief commissioners, and make additional public announcements to solicit buyers and renters in appropriate income levels. Initial quarterly audit by County Internal Auditors.
April 2010	Begin purchase and renovation work; Finalize property identification, review monitoring plans and internal audit functions, begin renovation, listing, and sale; provide monthly report; Hold additional public information meeting as noted above.
May 2010	First purchases in process, provide monthly report; continue to identify properties, as needed, provide quarterly report; hold additional public information meeting
June 2010 – December 2010	Continue all activities above, including monitoring, monthly and quarterly reporting, data collection and submission, Internal Audit review, etc.
February 2011	Send quarterly report; continue all activities above

December 2011	Send quarterly report; 50% of funds spent; move to quarterly reporting for duration
June 2011 – December 2012	Continue all activities, quarterly and annual reporting as required, sell all properties; complete all purchase and renovation, complete all down payment assistance and rental placements.

Results

This project will result in housing for 100 families with a minimum of 25% of them earning at or less than 50% of the median income. All of the properties purchased and renovated will have been foreclosed properties. Evidence based evaluations will determine increased stability in target areas, a clear reduction in abandoned properties and more owner-occupied homes.

c. Income targeting for 120%, and 50% of median

Using HUD's Income Limits Chart (available at www.huduser.org/datasets/nsp.html), Fulton County will target only those individuals or households whose income falls within the 120% and 50% LMMI as required by NSP2.

Fulton County FY 2009 Income Limits for 50% of HUD Area Median Income							
1 person household	**2 person household**	**3 person household**	**4 person household**	**5 person household**	**6 person household**	**7 person household**	**8 person household**
$25,100.00	$28,700.00	$32,250.00	$35,850.00	$38,700.00	$41,600.00	$44,450.00	$47,300.00
Fulton County FY 2009 Income Limits for 120% of HUD Area Median Income							
1 person household	**2 person household**	**3 person household**	**4 person household**	**5 person household**	**6 person household**	**7 person household**	**8 person household**
$60,250.00	$68,850.00	$77,450.00	$86,050.00	$92,900.00	$99,800.00	$106,700.00	$113,550

Utilizing current HUD published income limits County staff and development partners will accumulate all information necessary to make income eligibility determination and prepare a preliminary review of clients seeking housing. County staff will review all homeownership applications prior to final approval of the request. For tenants, County staff will work closely with management staff to make sure they understand the income eligibility process and will conduct regular monitoring of their activities throughout the affordability period. County staff will also track the income levels of all beneficiaries for each project upon completion to ensure compliance with the 25% program requirement to house those at or below 50% of median income.

d. Continued Affordability

Fulton County has adopted the affordability period requirements for the HOME Program as their standard for this program as contained in Sections 92.252 and 92.254 of the HOME regulations. Assistance provided through NSP will be secured by legal documents that spell out all these requirements throughout the affordability period. Rental projects will be monitored on a regular basis to ensure that they are meeting all requirements regarding the income of occupants, rents they are charging, and physical condition of the housing units and common property. Homeownership units will have recapture clauses built into the legal documents that will allow the appropriate entity to recapture the NSP investment or a portion thereof in the event the house is sold or the owner ceases to occupy it as his or her primary residence during the period of affordability. These periods of affordability will be determined as follows based upon the level of assistance provided per unit:

- Up to $15,000----------5 Years
- $15,001-$40,000----------10 Years
- Over $40,000----------15 Years
- New Construction of Rental Units----------20 Years

e. Consultation, Outreach, Communications

(1) Consulting with other units of local government

Fulton County has strong and positive relationships with local governments in the targeted area. A Cooperation Agreement is in place with all municipalities to cover other activities under the HOME and CDBG programs for the period 2009-2011. Contact was made with each of these municipalities to inform them of the County's intent to apply for NSP2 and of the target geography to be included in the application. As implementation moves forward, the County will work closely with each municipality in which prospective NSP2 projects are proposed to get their feedback. County staff will also work closely with these local governments to get their assistance with program marketing for potential homebuyers and tenants.

(2) Proposed outreach and affirmative marketing actions to ensure qualified families

In order to comply with federal regulations concerning affirmative marketing and fair housing, Fulton County will inform the public, owners, and prospective tenants about federal fair housing laws as well as its affirmative marketing policies. The developer will include the Equal Housing Opportunity logotype and/or slogan, and a logotype and/or slogan indicating accessibility to the disabled, in all press releases, solicitations, and program information materials.

Fulton County will further incorporate in its media, and require from its development partners, marketing materials which include information on strategies for reaching persons and groups not likely to apply, including, but not limited to, households with a disabled member. The County will further engage in special outreach to persons and groups in the housing market area who, in the absence of such outreach are not likely to apply for the housing. In determining what special outreach is needed, the County will take into account the racial and ethnic makeup of the neighborhood, language barriers, location, or other factors that might make it less likely that

some persons and groups (a) would be aware of the availability of the housing or (b) would be likely to apply for the housing. All families will be screened according to HUD requirements, including appropriately verified incomes.

(3) Continual communication of program design, progress, opportunities, and results; processing complaints in a timely manner and ensuring local citizens and interested parties are informed

Fulton County will use all methods available (publications, news stories, websites, utilization of the County's public access TV, etc.) to continually communicate the progress and design of the program. This will include ongoing updates on the County's website relative to program accomplishments, commitments, expenditures, and the location of all properties assisted with NSP2 funding. Contact information will be included in all public information, including email addresses and phone numbers of key NSP staff so that contact can be made easily by the public. The County will also work closely with local governments and neighborhood associations on program design and project location. All program complaints will be processed within 15 days if feasible.

F. PERFORMANCE MONITORING (10 POINTS)

(1) Describe monitoring plan

Because of the intensive nature of this program and the tight deadlines involved, Fulton County is committed to monitoring all program facets closely. These include adherence to commitment and expenditure deadlines as well as oversight of the projects undertaken by the County's development partners. The County will ensure that all activities are completed properly and timely through the use of internal management systems.

Primary responsibility for monitoring all commitment and expenditure deadlines will rest within the Housing and Community Development Financial Reporting section. The staff person responsible for processing all payments and reporting in Disaster Recovery Grant Reporting (DRGR) will develop a spreadsheet to track all deadlines in these areas. As projects are established and disbursements made, these will be entered into the spreadsheet. The Financial Reporting Section Manager will review the spreadsheet on a monthly basis and will share progress in this area with other senior management staff in the department and with the agency's Financial and Administrative Director.

The Community Development Specialists responsible for project development will closely oversee the activities of the development partners to be sure that all project requirements are met. County staff will review all projects proposed for acquisition to ensure that appraisals have been conducted in a timely fashion and that purchase prices are below the appraised value as required by HUD. Timelines will be developed with each development partner and staff will monitor adherence to those timelines in order that projects progress properly. In the event that a development partner defaults by not adhering to the timeline, the County will take immediate corrective action. The activities of the Community Development Specialists will be overseen by

the Community Development Manager for NSP who will report regularly to senior management staff in the department. Financial activities will have multiple tiers of oversight for guaranteed compliance.

- Level 1: Community Development Finance Specialist
- Level 2: Community Development Manager
- Level 3: Housing and Community Development Director
- Level 4: Health and Human Services Finance Manager
- Level 5: Fulton County Office of Internal Audit

(2) Describe how to meet internal audit requirement

The Neighborhood Stabilization Program and its expenditures, revenue and reporting is primarily the responsibility of the Community Development Manager and the Community Development Specialist for NSP Financial Reporting. Housing staff will also have access to and the support of financial staff located within the larger umbrella of the Health and Human agency in Fulton County, of which the Department of Housing and Economic Development is a member. In addition to these qualified staff resources, the County Finance Department's Grants Management Section will track commitments, expenditures and all draws-down of NSP funds. Finance Department staff members who have been assigned to assist with the NSP will review all entries into the DRGR information system for accuracy and reconcile all NSP accounts on a monthly basis with the Neighborhood Stabilization and Financial Reporting Sections.

As an added level of compliance and oversight the Internal Audit staff within the County Manager's office will carry out internal audit functions required for NSP2. The department currently reviews other HUD programs administered by the County on a quarterly basis. They will review all aspects of NSP2 to look at any potentially risky areas of program operations and management and make recommendations on strengthening the County's administration of the program.

RATING FACTOR 4: LEVERAGING OTHER FUNDS OR REMOVAL OF SUBSTANTIAL NEGATIVE EFFECTS

(a.) Leverage

While it is understood that federal funds (HOME, CDBG, etc.) cannot be used as leverage Fulton County will maximize the NSP investment through the integration of the Common Ground Initiative. Fulton County will further stabilize the impact of the current housing market by removing negative effects or destabilizing influences. With the NSP2 funds, Fulton will remove at least 120 foreclosed and vacant residential properties and occupy each with a qualified individual or family within the 120% LMMH. The County anticipates to join rehabilitation activities undertaken with NSP2 funds with weatherization and energy efficiency improvements made available through the ARRA energy assistance program provided to Southeast Energy Assistance, Inc.

As an additional layer of service Fulton County will modify and re-institute its Predatory Lending Mitigation Program which was previously designed to prevent Fulton County homeowners from becoming victims of predatory lending practices. Such practices include but not limited to, the origination of loans with high interest rates; the frequent resale of loans resulting in changes in the terms and interest rates, which make them almost impossible to repay; and the making of fraudulent loans using forged documents. An NSP designated staff person from Metro Fair Housing, a HUD certified counseling agency will serve in this capacity. Research Analyst facilitating the Common Ground Initiative will monitor loan activity to identify those individuals who may become victims of foreclosure. Additional services such as credit repair and legal assistance through Atlanta Legal Aide will be available.

(b) Value of destabilizing influences

See Appendix 4.

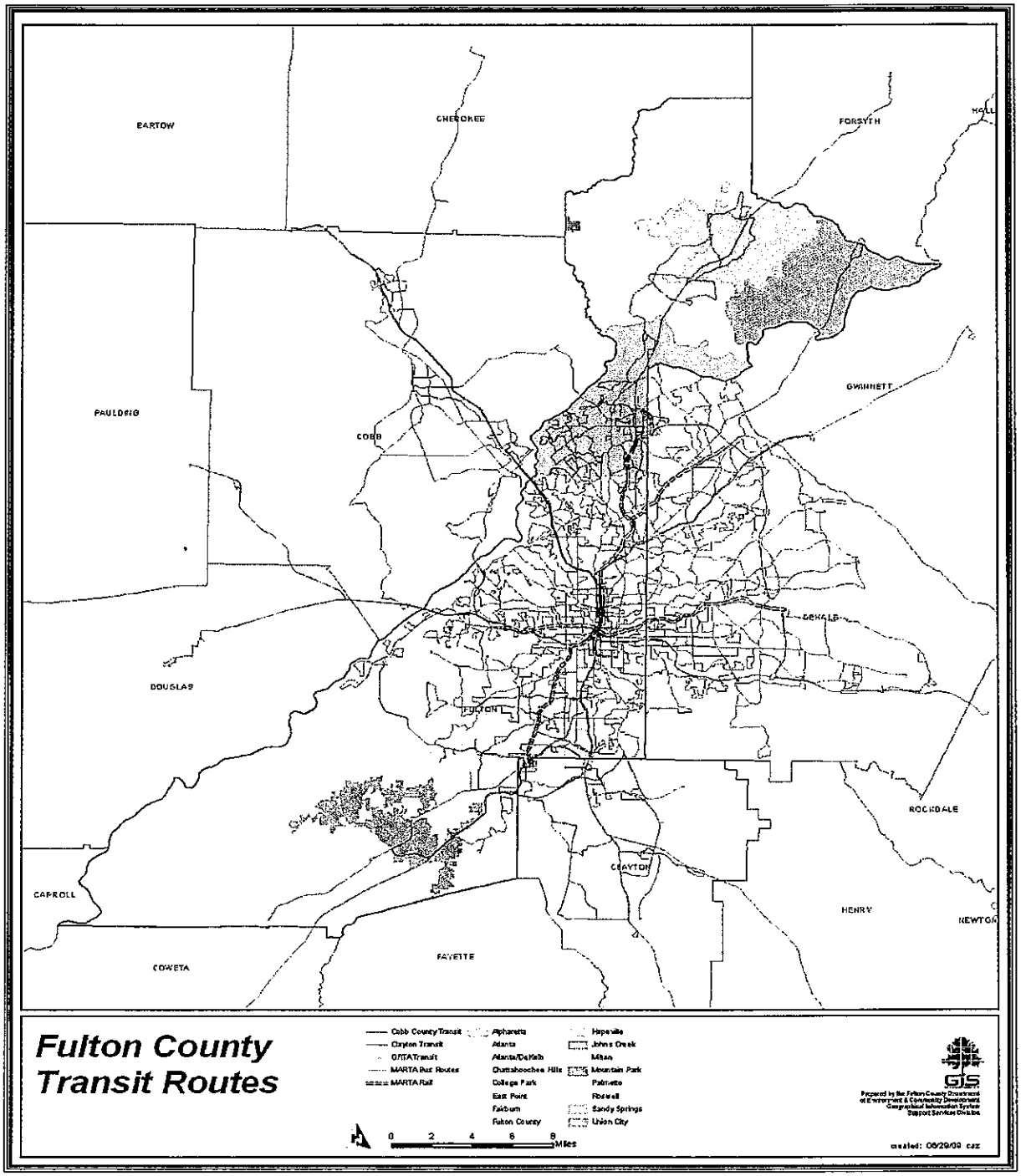
RATING FACTOR 5: ENERGY EFFICIENCY IMPROVEMENT AND SUSTAINABLE DEVELOPMENT FACTORS

a. Transit Accessibility

Fulton County is served by the Metropolitan Atlanta Rapid Transit Authority (MARTA) which is one of the larger transit systems in the country with both heavy rail and an extensive bus feeder system. As the 9th largest transit system in the United States, the MARTA provides more than 500,000 customer boardings each weekday through a combined bus, rail and paratransit service within DeKalb and Fulton Counties. With a mission to *"strengthen communities, advance economic competitiveness, and respect the environment by providing a safe and customer-focused regional transit system,"* MARTA successfully integrates services with the Georgia Regional Transit Authority (GRTA) which serves all of metro Atlanta with feeder buses as well. MARTA provides direct access (local bus service every 20 minutes during rush hour or an express commuter bus) to many of the census areas identified in this NSP2 application and indirect access bus or rail service (census tracts bordering a passenger rail stop or station) to those remaining.

It should be noted that transportation accessibility has been identified as a regional goal for Metropolitan Atlanta. In 2006 a Transit Planning Board (TPB), supported by the partnership of Atlanta Regional Commission (ARC), MARTA, the Georgia Regional Transportation Authority (GRTA), and local, county and state leaders emerged to develop a regional transitvision, The plan immediately calls for investment to optimize the existing core transit network, including a 25% increase in local and community bus service to serve existing needs, improved and expanded amenities such as sidewalks and bicycle facilities, and a focus on transit supportive land use and zoning policies. The plan, called Concept 3, serves as a major accomplishment for the region. The vision calls for a bold, multimodal, regional transit system stretching over 14

counties. The components of the plan include extensions to the MARTA rail system, introduction of other high capacity transit applications such as commuter rail, light rail, streetcar applications, Bus Rapid Transit (BRT) and the addition of arterial rapid bus service. (See Fulton County Transit Routes)



b. Green Building Standards
Fulton County will adhere to 2006 International Residential Code (IRC), the Georgia State Amendments, and International Energy Conservation Code on all projects. Projects will seek to improve energy efficiency of foreclosed and vacant residential properties purchased with NSP2 Grant funds. Fulton County will follow the Energy Star standards for all housing rehabilitation to establish a 15% minimum energy efficiency rating. All rehabilitations will incorporate light retrofitting and also involve one or more of the following energy efficient activities:

1. **Effective Insulation** - Properly installed and inspected insulation in floors, walls, and attics ensures even temperatures throughout the house, reduced energy use, and increased comfort.

2. **High-Performance Windows** - Energy-efficient windows employ advanced technologies, such as protective coatings and improved frames, to help keep heat in during winter and out during summer. These windows also block damaging ultraviolet sunlight that can discolor carpets and furnishings.

3. **Tight Construction and Ducts** - Sealing holes and cracks in the home's "envelope" and in heating and cooling duct systems helps reduce drafts, moisture, dust, pollen, and noise. A tightly sealed home improves comfort and indoor air quality while reducing utility and maintenance.

4. **Efficient Heating and Cooling Equipment** - In addition to using less energy to operate, energy-efficient heating and cooling systems can be quieter, reduce indoor humidity, and improve the overall comfort of the home. When properly installed into a tightly sealed home, this equipment won't have to work so hard to heat and cool the home.

5. **Efficient Products** - ENERGY STAR qualified homes may also be equipped with ENERGY STAR qualified products — lighting fixtures, compact fluorescent bulbs, ventilation fans, and appliances, such as refrigerators, dishwashers, and washing machines.

6. **Third-Party Verification** - With the help of independent Home Energy Raters, ENERGY STAR builder partners choose the most appropriate energy-saving features for their homes. Additionally, raters conduct onsite testing and inspections to verify the energy efficiency measures, as well as insulation, air tightness, and duct sealing details.

c. Re-Use of Cleared Sites - Fulton County does not intend to conduct any demolition projects. However, if a residential lot is available within the targeted area, Fulton will consider the affordability of acquisition and construction of a new home as it relates to its NSP2 Grant Program guidelines.

d. Deconstruction - Although no demolition is planned with NSP2, Fulton County will salvage and re-use building materials from any limited demolition activities related to rehabilitation whenever materials are usable.

e. Other Sustainable Development Practices - Fulton County will utilize as many NSP2 Recommended Energy Efficient and Environmentally-Friendly Green Elements as available in meeting the Energy Star certifications of any purchased foreclosed or vacant residential property that are economically feasible. Priority will be given to the following (in addition to those mentioned above):

Sustainable Landscaping
Energy Efficient Landscaping
Durable, Heat Absorbing, and Local Source Materials Usage
Green Label Certified and Healthy Flooring
Sealing Joints
Tub and Shower Enclosures for Moisture Prevention
Green Maintenance Guide and Resident Orientation

RATING FACTOR 6: NEIGHBORHOOD TRANSFORMATION AND ECONOMIC OPPORTUNITY

Fulton County's NSP2 Grant application and plan is consistent with its NSP1 program and the County's regionally approved Focus Fulton 2025 Comprehensive Plan http://www.fultonecd.org/focusfulton/index2.htm.

The County's approach to neighborhood transformation combines economic development with community building in order to strengthen stabilization efforts. Strategically Fulton County will meet public challenges through calculated planning and innovative collaborative efforts towards stabilization. Fulton County has historically presented as a strong and stable economic engine within the Atlanta Region.

Both NSP1 and NSP2 will utilize identical activities in acquiring, rehabilitating and selling foreclosed and/or vacant residential properties while providing an 8-hour HUD-approved home buyer education course and down payment assistance programs and "soft seconds" assistance. By focusing primarily on the high areas of Foreclosure Risk Scores, Fulton County will be able to maximize the efficiency for both NSP1 and NSP2 by targeting areas not included in either program and prioritizing the "High Priority" areas located within both programs' targeted areas.

The County has identified properties within a five mile radius of the South Fulton Service Center which will be utilized as a one-stop neighborhood stabilization shop. By focusing on these areas and the neighborhoods therein a more comprehensive, strategic approach can be implemented. Fulton will spur economic revitalization in areas affected by the current economic crisis by providing conveniently located services and support for acquiring affordable housing. Economic development initiatives /incentives, and work force development will also be included.

Economic development efforts seek to attract office space and research facilities. Although retail is a large industry in Fulton County, some areas are underserved. There are efforts underway to stimulate retention and redevelopment of retail along Old National Highway which is located within the target boundaries of Fulton County. Additional efforts are underway to revitalize

Fulton Industrial as an employment center, with an emphasis on bio-science, nano-technology and research parks.

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http://www.cccsatl.org/

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http://www.freerealvaluator.com

Department of Community Affairs, Georgia
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http://www.dataplace.org

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C. Disclosures

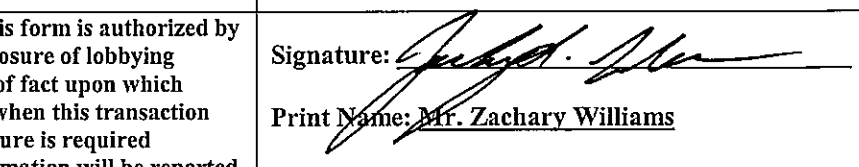
SF-LLL: Disclosure of Lobbying Activities

Approved by OMB
0348-0046

Disclosure of Lobbying Activities

Complete this form to disclose lobbying activities pursuant to 31 U.S.C. 1352
(See reverse for public burden disclosure)

1. **Type of Federal Action:** a. contract X b. grant c. cooperative agreement d. loan e. loan guarantee f. loan insurance	2. **Status of Federal Action:** a. bid/offer/application X b. initial award c. post-award	3. **Report Type:** X a. initial filing b. material change **For material change only:** Year _____ quarter _____ Date of last report_____

4. **Name and Address of Reporting Entity:** X Prime _____ Subawardee Tier_____, if Known: **Fulton County, Georgia** **141 Pryor Street** **Atlanta, Georgia 30303** **Congressional District,** GA-005; GA-006; GA-013	5. **If Reporting Entity in No. 4 is Subawardee,** Enter Name and Address of Prime: **Congressional District,** *if known*:
6. **Federal Department/Agency:** **HUD**	7. **Federal Program Name/Description:** **NSP-2** CFDA Number, *if applicable*: _____
8. **Federal Action Number,** *if known:*	9. **Award Amount,** *if known:* **$**
10. a. **Name and Address of Lobbying Registrant** *(if individual, last name, first name, MI):* **Boggs, Patton LLP** **2550 M. Street NW** **Washington, DC: District of Columbia 20037**	b. **Individuals Performing Services** *(including address if different from No. 10a)* *(last name, first name, MI):* **Gootman, Marek** **2550 M. Street NW** **Washington, DC: District of Columbia 20037**
11. Information requested through this form is authorized by title 31 U.S.C. section 1352. This disclosure of lobbying activities is a material representation of fact upon which reliance was placed by the tier above when this transaction was made or entered into. This disclosure is required pursuant to 31 U.S.C. 1352. This information will be reported to the Congress semi-annually and will be available for public inspection. Any person who fails to file the required disclosure shall be subject to a civil penalty of not less than $10,000 and not more than $100,000 for each such failure.	**Signature:**  **Print Name: Mr. Zachary Williams** **Title: Fulton County Manger** **Telephone No.: 404-612-4500 Date: 07/15/2009**
Federal Use Only	**Authorized for Local Reproduction** **Standard Form - LLL (Rev. 7-97)**

HUD-2880: Applicant/Recipient Disclosure/Update Report ("HUD Applicant Recipient Disclosure Report")

EXHIBIT 2b

Applicant/Recipient Disclosure/Update Report

U.S. Department of Housing and Urban Development

OMB Approval No. 2510-0011 (exp. 8/31/2009)

Instructions. (See Public Reporting Statement and Privacy Act Statement and detailed instructions on page 2.)

Applicant/Recipient Information

Indicate whether this is an Initial Report X ☐ **or an Update Report** ☐

1. Applicant/Recipient Name, Address, and Phone (include area code):	2. Social Security Number or Employer ID Number:
Fulton County Department of Housing and Community Development (404) 612-8335	58-6001729
3. HUD Program Name	**4. Amount of HUD Assistance Requested/Received**
NSP-2	$15,489,375

5. State the name and location (street address, City and State) of the project or activity:
141 Pryor Street, SW Suite 5001 Atlanta, Georgia 30303

Part I Threshold Determinations

1. Are you applying for assistance for a specific project or activity? These terms do not include formula grants, such as public housing operating subsidy or CDBG block grants. (For further information see 24 CFR Sec. 4.3).
X Yes ☐ No

2. Have you received or do you expect to receive assistance within the jurisdiction of the Department (HUD), involving the project or activity in this application, in excess of $200,000 during this fiscal year (Oct. 1 - Sep. 30)? For further information, see 24 CFR Sec. 4.9
X Yes ☐ No.

If you answered "**No**" to either question 1 or 2, **Stop!** You do not need to complete the remainder of this form.
However, you must sign the certification at the end of the report.

Part II Other Government Assistance Provided or Requested / Expected Sources and Use of Funds.

Such assistance includes, but is not limited to, any grant, loan, subsidy, guarantee, insurance, payment, credit, or tax benefit.

Department/State/Local Agency Name and Address	Type of Assistance	Amount Requested/Provided	Expected Uses of the Funds
HUD (Washington, D.C.)	Grant (CDBG)	$2,477,719	Community Development
HUD (Washington, D.C.)	Grant (ESG)	$96,062	Emergency Shelter
HUD (Washington, D.C.)	Grant (NSP1)	$10,333,410	Neighborhood Stabilization

(**Note:** Use Additional pages if necessary.)

Part III Interested Parties. You must disclose:

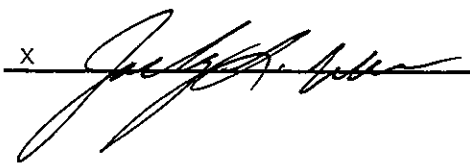
1. All developers, contractors, or consultants involved in the application for the assistance or in the planning, development, or implementation of the project or activity and
2. any other person who has a financial interest in the project or activity for which the assistance is sought that exceeds $50,000 or 10 percent of the assistance (whichever is lower).

Alphabetical list of all persons with a reportable financial interest in the project or activity (For individuals, give the last name first)	Social Security No. or Employee ID No.	Type of Participation in Project/Activity	Financial Interest in Project/Activity ($ and %)
NOT APPLICABLE			

(**Note:** Use Additional pages if necessary.)

Certification

Warning: If you knowingly make a false statement on this form, you may be subject to civil or criminal penalties under Section 1001 of Title 18 of the United States Code. In addition, any person who knowingly and materially violates any required disclosures of information, including intentional non-disclosure, is subject to civil money penalty not to exceed $10,000 for each violation.
I certify that this information is true and complete.

Signature:	Date: (mm/dd/yyyy)
X 	July 15, 2009

D. Appendices

Appendix 1: Code of Conduct

Conflict of Interest Policy

CONFLICT OF INTEREST POLICY

Potential conflicts of interest may arise from many situations. Some of the more common examples are:

- Requests for program assistance from employees and/or families of employees, or board members and/or families of board members of recipients or sub-recipients; and

- Recipients or sub-recipients contracting with or procuring materials from employees and/or families of employees, or board members and/or families of board members of recipients or sub-recipients.

It is the responsibility of the recipient to identify conflicts of interest, whether real or perceived, and to comply with the appropriate regulations.

REQUIREMENTS FOR PJs, STATE RECIPIENTS AND SUBRECIPIENTS

Overview: The HOME regulations require participating jurisdictions (PJs), state recipients and sub-recipients (including CHDOs that are acting as sub-recipients) to comply with two different sets of conflict-of-interest provisions. The first set of provisions comes from 24 CFR Parts 84 and 85, is set forth in the HOME regulations. (Fulton County is a PJ.)

Activities covered by CFR provisions: In the procurement of property and services by PJs, state recipients and subrecipients, the conflict-of-interest provisions at 24 CFR 85.36 and 24 CFR 84.42 apply. These regulations require PJs and sub-recipients to maintain written standards governing the performance of their employees engaged in awarding and administering contracts. At a minimum, these standards must:

1. Require that no employee, officer, agent of the PJ or its sub-recipients shall participate in the selection, award or administration of a contract supported by HOME if a conflict-of-interest, either real or apparent, would be involved;

2. Require that the PJ or sub-recipient employees, officers and agents not accept gratuities, favors or anything of monetary value from contractors, potential contractors or parties to sub-agreements; and

3. Stipulate provisions for penalties, sanctions or other disciplinary actions for violations of standards.

A conflict would arise when any of the following has a financial or other interest in a firm selected for award:

1. An employee, agent or officer of the PJ or sub-recipient;

2. Any member of an employee's, agents or officer's immediate family;

3. An employee's, agent's or officer's partner; or

4. An organization that employs or is about to employ an employee, agent or officer of the PJ or sub-recipients.

ACTIVITIES COVERED BY HOME REGULATIONS

In cases not covered by 24 CFR 85.36 and 24 CFR 84.42, the HOME regulations at 24 CFR 92.356 governing conflict-of-interest apply. These provisions cover employees, agents, consultants, officers and elected or appointed officials of the PJ, state recipient or subrecipient. The HOME regulations state that no covered person who exercises or has exercised any functions or responsibilities with respect to HOME activities or who is in a position to participate in decisions or gain inside information:

1. May obtain a financial interest or benefit from a HOME activity; or

2. Have an interest in any contract, subcontract or agreement for themselves or for persons with business or family ties.

This requirement applies to covered persons during their tenure and for one year after leaving the PJ, state recipient or sub-recipient entity.

Exceptions: Upon written request, exception to both sets of provisions may be granted by the U.S. Department of Housing and Urban Development (HUD) on a case-by-case basis only after the PJ has:

1. Disclosed the full nature of the conflict and submitted proof that the disclosure has been made public, and

2. Provided its legal opinion stating that there would be no violation of state or local law if the exception were granted.

PROVISIONS FOR NONPROFIT AND FOR-PROFIT OWNERS, DEVELOPERS AND SPONSORS

The HOME Regulations state that no owner, developer or sponsor of HOME-assisted housing, including their officers, employees, agents or consultants, may occupy a HOME-assisted unit in a development. The provisions do not apply to:

1. An individual receiving HOME funds to acquire or rehabilitate his/her principal residence, or

2. An individual living in a HOME-assisted rental housing development where he/she is a project manager or a maintenance worker in that development.

Exceptions: Exceptions to this conflict-of-interest provision (for governing owners, developers and sponsors of HOME-assisted housing) may be granted by the PJ on a case-by-case basis based on the following factors as set forth in the regulations:

1. Whether the person receiving the benefit is a member of a group or class of low-income persons intended to be the beneficiaries of assisted housing, and the exception will permit him or her to receive generally the same interest or benefits as are being made available or provided to the group as a whole;

2. Whether the person has withdrawn from his or her functions or responsibilities, or the decision-making process with respect to the specific assisted housing in question;

3. Whether the tenant protection requirements of CFR 92.253 (prohibited lease terms, termination of tenancy and tenant selection) are being observed;

4. Whether the affirmative marketing requirements are being observed and followed; and

5. Any other factor relevant to the PJ's determination, including the timing of the requested exception.

Executing and maintaining conflict-of-interest provisions: While not specifically required in the HOME regulations, PJs should include the conflict-of-interest provision in written agreements and other documents with owners, developers and sponsors. In addition, monitoring of projects should include necessary actions to ensure that this provision is followed.

RELIGIOUS AND FAITH-BASED ORGANIZATIONS

HOME funds ***may*** be provided to primarily religious organizations for any eligible activity, excluding inherently religious activities. This provision, per the September 30, 2003 revision to the Final Rule for 24 CFR Part 92, is intended to eliminate barriers to the HOME program and ensure that the program is open to all qualified organizations, regardless of their religious character.

However, housing rehabilitated, developed, or owned by a religious or faith-based organization must be available to <u>all</u> persons, regardless of religion. In particular, there must be no religious or membership criteria to participate in the project.

CONFLICT OF INTEREST: The HOME Regulations – 24 CFR 92.356.

(a) Applicability. In the procurement of the property and services, the conflict of interest provisions in 24 CFR 94.42 and 24 CFR 85.36 apply respectively.

(b) Conflicts prohibited. No persons, described in paragraph (c) of this section, who exercise or have exercised any functions or responsibilities with respect to activities assisted with HOME funds or who are in a position to participate in a decision-making process or gain inside information with regard to these activities, may obtain a financial interest or benefit from a HOME-assisted activity, or have an interest in any contract, subcontract or agreement with respect thereto, or the proceeds thereunder, either for themselves or those with whom they have family or business ties, during their tenure or for one year thereafter.

(c) Persons covered. The conflict of interest provisions or paragraph (b) of this section apply to any person who is an employee, agent, consultant, officer or elected official or appointed official of the PJ, state recipient or sub-recipient which are receiving HOME funds.

(d) Exceptions. Threshold requirements. Upon the written request of the PJ, HUD may grant an exception to the provision of paragraph (b) of this section on a case-by-case basis, when it determines that the exception will serve to further the purposes of the HOME Investment Partnerships Programs and the effective and efficient administration of the PJ's program or project. An exception may be considered only after the PJ has provided the following:

(1) A disclosure of the nature of the conflict, accompanied by an assurance that there has been public disclosure of the conflict and a description of how the public disclosure was made; and

(2) An opinion of the PJ's or state recipient's attorney that the interest for which the exception is sought would not violate state or local law.

(e) Factors to be considered for exceptions. In determining whether to grant a requested exception after the PJ has satisfactorily met the requirements of paragraph (d) of this section, HUD will consider the cumulative effect of the following factors, where applicable:

(1) Whether the exception would provide a significant cost benefit or an essential degree of expertise to the program or project which would otherwise not be available;

(2) Whether the person affected is a member of a group or class of low-income persons intended to be the beneficiaries of the assisted activity, and the exception will permit such person to receive generally the same interests or benefits as are being made available or provided to the group or class;

(3) Whether the affected person has withdrawn from his or her functions or responsibility, or the decision-making process with respect to the specific assisted activity in question;

(4) Whether the interest or benefit was present before the affected person was in a position as described in paragraph (c) of this section;

(5) Whether undue hardship will result either to the PJ or the person affected when weighed against the public interest served by avoiding the prohibited conflict; and

(6) Any other relevant considerations.

(f) Owners and Developers.

(1) No owner, developer or sponsor of a project assisted with HOME funds (or officer, employee, agent or consultant of the owner, developer or sponsor) whether private, for-profit or nonprofit (including a community housing development organization (CHDO) when acting as an owner, developer or sponsor) may occupy a HOME-assisted affordable housing unit in a project. This provision does not apply to an owner-occupant of single-family housing or to an employee or agent of the owner or developer of a rental housing project who occupies a HOME-assisted unit as the project manager or maintenance worker.

(2) Exceptions. Upon written request of a housing owner or developer, the PJ (or state recipient, if authorized by the state PJ) may grant an exception to the provisions of paragraph (f) (1) of this section on a case-by-case basis when it determines that the exception will serve to further the purposes of the HOME Program and the effective and efficient administration of the owner's or developer's HOME-assisted project. In determining whether to grant a request exception, the PJ shall consider the following factors:

(i) Whether the person receiving the benefit is a member of a group or class of low-income persons intended to be the beneficiaries of the assisted housing, and the exception will permit such person to receive generally the same interests or benefits as are being made available or provided to the group or class;

(ii) Whether the person has withdrawn from his or her functions or responsibilities, or the decision-making process with respect to the specific assisted housing in question;

(iii) Whether the tenant protection requirements of 92.253 are being observed;

(iv) Whether the affirmative marketing requirements of 92.351 are being observed and followed; and

(v) Any other factor relevant to the PJs' determination, including the timing of the requested exception.

Fulton County Code of Ethics

Fulton County Code of Ethics[1] - As Amended Through October 18, 2006

Sec. 2-66. Declaration of policy.

It is essential to the proper government and administration of Fulton County that members of the board of commissioners, as well as all other officers and employees of the county, are in fact and in appearance, independent and impartial in the performance of their official duties; that public service not be used for private gain; and that there be public confidence in the integrity of the county. Because the attainment of one or more of these ends is impaired whenever there exists in fact, or appears to exist, a conflict between the private interests and public responsibilities of county officers and employees, the public interest requires that the county protect against such conflicts of interest by establishing appropriate ethical standards of conduct. It is also essential to the efficient operation of the county that those persons best qualified be encouraged to serve in positions of public trust. Accordingly, the standards hereinafter set forth must be so interpreted and understood as not to unreasonably frustrate or impede the desire or inclination to seek and serve in public office by those persons best qualified to serve. To that end, no officer or employee of the county, except as otherwise provided by law, should be denied the opportunity available to all other citizens to acquire and maintain private, economic and other interests, except where a conflict of interest situation would necessarily result. The policy and purpose of this code of ethics, therefore, is to make clear those standards of ethical conduct that shall be applicable to the persons hereinabove named in the discharge of their official duties; to implement the objective of protecting the integrity of the county's government; and to prescribe only such essential

[1] Re-enacted in its entirety 2/4/04, Agenda Item No. 03-1531.

restrictions against conflicts of interest as will not impose unnecessary barriers against public service.

Sec. 2-67. Definitions.

(1) *Business* means any corporation, partnership, proprietorship, organization, self-employed individual and any other entity operated for economic gain, whether professional, industrial, or commercial, and other entities, which for purposes of federal income taxation are operated as non-profit organizations.

(2) *Confidential information* means information which has been obtained in the course of performing official duties as an officer or employee.

(3) *Contract* means any written or otherwise established agreement, lease, claim, account, or demand against any person, to which the county is an actual or otherwise interested party.

(4) *Gifts and favors* means anything of value given by or received from a prohibited source. *Prohibited source* means any person, business, or entity that the involved officer or employee knows or should know:

(a) is seeking official action from the county; or

(b) is seeking to do or is doing business with the county, or

(c) represents a person who is seeking official action from the county or who is seeking to do or is doing business with the county; or

(d) has interests that may be affected by the performance or non-performance of official duties by the officer or employee; or

(e) is a registered lobbyist in accordance with state law.

(5) *Immediate family* means an officer or employee and the spouse of or an individual in a certified committed relationship or legally recognized domestic partnership with an officer or employee, as well as the parents, children, brothers, and sisters of an officer or employee.

(6) *Intent* means the state of mind in which a person seeks to accomplish a given result through a deliberate course of action. Intent is the design, resolve, or determination with which a person acts, and which can seldom be proved by direct evidence, but must usually be proved by circumstances from which intent may be inferred.

(7) *Intent to influence* means to deliberately and willfully act in a manner chosen and designed to exert power over others, or to modify or affect the actions of others, even if in a gentle, subtle, or gradual fashion.

(8) *Interest* means any financial interest or personal interest or any other direct or indirect pecuniary or material benefit held by or accruing to an officer or employee as a result of a contract or transaction which is or may be the subject of an official act or action by or with the county. Unless otherwise provided, the term "interest" does not include any remote interest. For purposes of this code of ethics, the term *financial interest* means any interest which shall, directly or indirectly, yield a monetary or other material benefit to the officer or employee, or to any person employing or retaining the services of the officer or employee, or to the immediate family of the officer or employee; and, the term *personal interest* means any interest arising from relationships between the officer or employee and members of his or her immediate family or from associations with any business, whether or not a financial interest is involved. For the

purposes of this code of ethics, and without being limited thereto, an officer or employee shall be deemed to have an interest in matters and transactions involving:

(a) any person in his or her immediate family;

(b) any person with whom a contractual relationship (either written or implied) exists, whereby he or she may receive any payment or other benefit, including any agreement for employment; and

(c) any business in which he or she is a director, officer, employee, prospective employee, or substantial shareholder.

(9) *Lobbyist* means (i) any natural person who, for compensation, either individually or as an employee of another person, undertakes to promote or oppose the passage, approval, or defeat of an ordinance or resolution by the board of commissioners; and (ii) any natural person who makes a total expenditure of more than $250.00 in a calendar year to promote or oppose the passage, approval, or defeat of an ordinance or resolution by the board of commissioners, but not including the person's own travel, food and lodging expenses, or expenses for informational materials.

(10) *Matter or transaction* means the subject of any official act or action by an officer or employee or any governing body of the county or any county agency.

(11) *Officer or employee* means any elected officer of the county, any person appointed to a county board, commission, or agency by the board of commissioners, any person employed by the county, including contractual employees, and any person retained by the county or any agency of the county in a consulting capacity, who is exclusively obligated to the county for a period of 90 or more days. This definition does not include members of advisory boards having no decision-making authority; provided,

however, that county employees serving on the Advisory Committee of the Atlanta/Fulton County Water Resources Commission continue to be included within this definition while serving on that Advisory Committee. This definition includes retired former employees and other former employees of the county during any period in which they are later employed or retained by the county or any county agency. *(Amended 8/17/05, item no. 05-0975)*

(12) *Official act or action* means any executive, legislative, administrative, appointive, ministerial, or discretionary act taken by the board of commissioners or the county manager, as well as any such act taken by any other officer or employee in the performance of his or her official duties.

(13) *Paid* means the receipt of, or right to receive, a salary or a commission, percentage, brokerage, or contingent fee for services.

(14) *Participate* means to take part in any official act, actions, or proceedings personally, and to take part in such acts, actions, or proceedings as an officer or employee for the purpose of performing a duty, granting or denying approvals, rendering decisions, or failing to so act or perform such a duty.

(15) *Participation in contracting* means, with respect to current officers and employees as well as former officers and employees during the time periods set forth in Section 2-77(b), to take part in any official act, actions, or proceedings personally, which acts, actions, or proceedings involve county contracts, and to take part in such acts, actions, or proceedings as an officer or employee for the purpose of performing a duty, or otherwise to grant or deny approvals, make recommendations, prepare any part of purchasing specifications or solicitations for bids or proposals, to influence the content of

such documents, to render advice regarding such documents or contracts or the interpretation or meaning of county regulations and policies relevant to such documents or contracts, to investigate, audit, review, or make any ruling or determination regarding any proceedings or applications relating to such documents or contracts or related sub-contracts, or to attempt to or actually influence the official acts, actions, proceedings, or decisions of others. (*Amended 10/18/06, item no. 06-1102*)

(16) *Person* means any individual, business, representative, fiduciary, trust, or association.

(17) *Reprimand* means an action taken by the board of ethics, which constitutes and transmits a public disapproval of the conduct of an officer or employee.

Sec. 2-68. Conflicts of interest generally / Impartiality.

(a) Officers and employees shall avoid even the appearance of a conflict of interest. An appearance of a conflict of interest exists when a reasonable person would conclude from the surrounding circumstances that the ability of the officer or employee to protect the public interest or impartially perform a public duty is compromised by financial or personal interests in the matter or transaction. The appearance of a conflict of interest can exist even in the absence of an actual conflict of interest, which exists whenever the officer or employee knows or should know that he or she has an interest that may be affected by his or her official acts or actions.

(b) No officer or employee shall by his or her conduct give reasonable basis for the impression that any person can improperly influence him or her, or unduly enjoy his or her favor, in the performance of any official acts or actions.

(c) No officer or employee shall, by virtue of his or her position with the county, except as necessary in the performance of his or her official duties, directly or indirectly influence or attempt to influence the decision of any other officer or employee who must act to further any county procurement, policy, contract, matter, or transaction.

Sec. 2-69. Gifts and favors / Honoraria.

(a) No officer or employee shall directly or indirectly solicit, request, exact, receive, or agree to receive a gift, loan, favor, promise, or thing of value, in any form whatsoever, for himself or herself or another person, from any prohibited source, including, without limitation, any person or business which the officer or employee knows or should know is doing business with the county or attempting to do business with the county, or the agent or representative of such a person or business.

(b) No officer or employee shall directly or indirectly solicit, request, exact, receive or agree to receive an honorarium, which, for purposes of this section, means a payment of money or anything of value for any service, including, but not limited to, appearances, speeches, or articles, if the subject matter of the appearance, speech, or article relates to the official duties of the officer or employee and such payment or other thing of value is given to the officer or employee because of his or her status with the county.

(c) This section shall not apply in the case of:

(1) any nonpecuniary gift, ticket, or other thing of value, the value of which is $100.00 or less;

(2) an award publicly presented in recognition of public service;

(3) a commercially reasonable loan made in the ordinary course of business by an institution authorized by law to engage in the making of such a loan;

(4) a ticket or pass of admission or other evidence of a right of free entry, or for an amount less than the amount printed on the ticket, given to an officer or employee by a member of his or her immediate family, or given by a business, other than a public agency, in which the officer or employee or a member of his or her immediate family serves as an officer, director, stockholder, creditor, trustee, partner, or employee; and

(5) any ticket or other pass of admission to any recreational, musical, theatrical, or sporting event for less than the face value of such ticket or pass of admission, for an entertainment or athletic event at which the officer or employee is performing an *official duty*, which means, for purposes of this subsection, any appearance, meeting, discussion, greeting, or introduction, the substantial purpose of which is related to the performance of an official act or action.

(d) Under no circumstances shall any ticket or other pass of admission to any recreational, musical, theatrical, or sporting event for less than the face value of such ticket or pass of admission, which has been received by an officer or employee pursuant to paragraphs (c)(1) or (c)(5) of this section, be transferred by such officer or employee to another for money or consideration of any kind.

Sec. 2-70. Campaign contributions.

This code of ethics shall not apply to campaign contributions made pursuant to the laws of the State of Georgia.

Sec. 2-71. Confidential information.

No officer or employee shall disclose, except as required by law, or otherwise use confidential information acquired by virtue of his or her position with the county for his, her, or another person's private gain, or in order to advance his or her financial or personal interests or the financial or personal interests of any person or business, where such use would conflict with the best interests of the county.

Sec. 2-72. Representation.

(a) No officer or employee shall appear on his or her own behalf, or represent, or appear on behalf of any person, whether paid or unpaid, before any court or before any individual, legislative, administrative, or quasijudicial board, body, agency, commission, or committee appointed by the county manager, board of commissioners, or other county official, concerning any contract, matter or transaction which is or may be the subject of an official act or action of the county, except in the regular discharge of their official duties, or otherwise use or attempt to use his or her official position to secure unwarranted privileges or exemptions for himself, herself, or other persons; provided, however, that this subsection shall not prohibit an officer or employee from appearing on his or her own behalf, concerning any contract, matter or transaction, unless such officer or employee knows or reasonably should know that the contract, matter or transaction is under his or her official responsibility as such officer or employee.

(b) No officer or employee shall represent any person or business, whose interests are in conflict with the interests of the county, in any proceeding or litigation in which the county or any agency of the county is a party, or in any action, proceeding, or litigation in which the complainant is the county or any agency of the county.

Sec. 2-73. Incompatible employment / Nepotism.

(a) No officer or employee shall solicit, request, or accept employment with, or render services to, any person, business, or professional association when doing so is adverse to and incompatible with the proper discharge of his or her official duties.

(b) No officer or employee shall advocate for or cause, directly or indirectly, the hiring, advancement, promotion, or transfer of a member of his or her family to any office or position with the county or a county agency.

(c) No officer or employee having authority to appoint or recommend for appointment members of any county board, commission, or authority shall appoint or recommend for appointment a member of his or her family.

Sec. 2-74. Abstention and disclosure of interest.

An officer or employee who has an interest in a contract, matter, or transaction that he or she has reason to believe will be affected by his or her official acts or actions, or by the official acts or actions of the county, shall abstain from participating in such official acts or actions and shall not vote for or against, discuss, decide, or otherwise participate in the county's consideration of the contract, matter, or transaction, or otherwise attempt to or actually influence the vote, discussion, or decision of the county regarding the contract, matter, or transaction. In addition, the officer or employee shall disclose publicly the nature of such interest prior to any determination of the contract, matter, or transaction.

Sec. 2-75. Incompatible interests.

(a) No officer or employee shall invest or hold any investment, directly or indirectly, in any financial, business, commercial, or other private contract, matter, or transaction,

which creates a conflict with and adversely affects the performance of official duties by the officer or employee to the detriment of the county.

(b) No officer or employee shall solicit, request, or accept employment by, or agree to otherwise provide services to, any person or business when such employment or the providing of such services is adverse to and incompatible with the proper discharge of official duties by the officer or employee.

(c) No officer or employee shall own stock in any business doing business with the county. This section is not intended to apply where the officer or employee owns less than ten percent (10%) of any company or publicly traded stock.

(d) An employee may serve as a director of any not-for-profit or charitable business or organization that receives or solicits any grant funding from the county or a county agency, as long as that employee is not involved in the grant selection process. (*Added 3/16/04, item no. 05-0294*)

Sec. 2-76. Contracts involving officers and employees.

(a) The county shall not enter into any contract involving services or property with an officer or employee, or with a person or business in which an officer or employee has an interest. This section shall not apply in the case of:

(1) contracts for goods or services with an officer or employee, or member of the immediate family of an officer or employee, or a business that employs an officer or employee, or member of the immediate family of an officer or employee, where (i) the contract is competitively procured and (ii) the officer or employee does not participate in any aspect of the

procurement or performance of the contract; *(Amended 8/4/04, item no. 04-0796)*

(2) the designation of a bank or trust company as a depository for county funds;

(3) the borrowing of funds from any bank or lending institution which offers the lowest available rate of interest for such loan;

(4) contracts for services entered into with a business which is the only available source for such goods or services; and

(5) contracts entered into under circumstances which constitute an emergency situation, provided that a record explaining the emergency is prepared by the county manager and submitted to the board of ethics at its next regular meeting.

(b) No officer or employee shall participate in any contract involving the county if he or she knows or should have known that an interest in the contract is possessed by such officer or employee, one or more members of his or her immediate family, or any business, other than a public agency, in which he or she or a member of his or her immediate family serves as an officer, director, stockholder, creditor, trustee, partner, or employee.

Sec. 2-77. Unemployed officers and employees.

(a) No officer or employee shall, after the termination of his or her employment with the county, participate in any contract with the county, in a managerial, entrepreneurial, or consulting capacity. For the purposes of this section, "consulting" shall include, but not be limited to, advising any person doing business with the county or seeking to do

business with the county (whether as a prime contractor or subcontractor) regarding the meaning and application of county rules and regulations, the administration of which were a part of the official responsibility of the officer or employee before termination of his or her employment. In addition, no officer or employee shall, after termination of his or her employment with the county, knowingly make, with the intent to influence, any communication to or appearance before any department, board, or other authority of the county in connection with a particular matter:

(1) in which the county has a direct and substantial interest; and

(2) in which such person knows or reasonably should know was under his or her official responsibility as such officer or employee before the termination of his or her employment with the county. (*Amended 10/18/06, item no. 06-1102*)

(b) The restrictions set forth in this section shall be in effect for a period of one year after the termination of the officer's or employee's employment with the county; provided, however, with respect to former members of the board of commissioners, the restrictions shall be in effect for a period of two years after leaving office; provided, further, that in the case of any former member of the board of commissioners who is convicted of a felony criminal offense in connection with the solicitation or award of a county contract, the restrictions shall be in effect for a period of seven years, beginning at the time of the conviction, except that in cases where a period of imprisonment is ordered, the seven years shall begin at the completion of the period of imprisonment.

Sec. 2-78. Compliance with applicable laws.

No officer or employee shall engage in any activity or transaction that is prohibited by any law, now existing or hereafter enacted, which is applicable to him or her by virtue of his or her office. When any provision of this code of ethics shall conflict with the laws of Georgia or the United States, such laws shall apply. If any section of this code of ethics shall be declared by any court to be invalid, the remaining sections shall remain applicable.

Sec. 2-79. Disclosure of income and financial interests. *(Amended 8/4/04, item no. 04-0796)*

(a) On or before April 15 of each calendar year, each of the following individuals shall file an income and financial disclosure report with the clerk to the commission, which report shall cover the preceding calendar year:

(1) all elected officials of Fulton County, as well as judges of the juvenile and magistrate courts;

(2) county manager;

(3) deputy county managers;

(4) all department heads, including the county attorney and the clerk to the commission, as well as all division heads reporting to the county manager, and the deputy director of zoning;

(5) members of the board of tax assessors and all property appraisers;

(6) members of the community zoning board;

(7) members of the board of zoning appeals; and

(8) members of the board of ethics.

(b) Each such report shall identify the source of each of the following, received or accrued during the preceding calendar year, by each person required to file such report and such person's spouse, if any:

(1) any income for services rendered of $1,000.00 or more;

(2) any honorarium from a single source in the aggregate amount of $500.00 or more, except as otherwise reported under applicable state law;

(3) any gift or favor from a single prohibited source in the aggregate amount of $100.00 or more; and

(4) any dividend income of $1,000.00 or more.

(c) Each such report shall also contain:

(1) the name, address and general description of any professional organization in which the person reporting is an officer, director, partner, proprietor, or employee, or serves in any advisory capacity, from which income of $1,000.00 or more was received;

(2) the name and address of every business in which the person reporting owns 10% or more of such business's then outstanding stock;

(3) the address and tax parcel ID number of all real property in which the person reporting has an ownership interest valued at 5% or more of the property's then assessed value; and

(4) the source, date and amount of any reimbursement of expenses to the person reporting in the amount of $1,000.00 or more.

Sec. 2-80. Board of ethics / Creation / Duties.

(a) *Creation.* There is hereby created a body to be known as the Fulton County board of ethics.

(b) *Membership.* The board of ethics shall consist of the following seven (7) members, who shall have been residents of Fulton County for not less than three years preceding their selection:

(1) One member to be selected by the president of the Atlanta Bar Association from among the Association's membership;

(2) One member to be selected by the president of the Gate City Bar Association from among the Association's membership;

(3) One member to be selected by the president of the North Fulton Chamber of Commerce from among the Chamber's membership;

(4) One member to be selected by the president of the Atlanta Business League from the membership of the Atlanta Business League;

(5) One member to be selected by the president of the Atlanta Airport Chamber of Commerce from among the Chamber's membership;

(6) One member to be selected by the personnel board of the county from its membership; and

(7) One member to be appointed by the board of commissioners.

(c) *Chair.* At the first meeting of the board of ethics in each calendar year, the board shall select, from among its members, a chair who shall serve as chair for the remainder of the calendar year and until a successor is chosen pursuant to this subsection.

(d) *Compensation, organization, and meetings.* Members of the board of ethics shall be paid a per diem in the amount of $150.00. The board of ethics shall meet no less than is required to conduct the business of the board, which in no event shall be less than once each calendar quarter. All meetings of the board of ethics shall be held at the Fulton County Government Center.

(e) *Term of office.* The members first selected pursuant to subsections (b)(1) and (2), above, shall serve an initial term of one year from the date of their selection. The terms of office of the members first selected pursuant to subsections (b)(3) and (4), above, shall expire one year after the expiration of the terms of office of the persons selected pursuant to subsections (b)(1) and (b)(2), above. The terms of office of the members first selected pursuant to subsections (b)(5), (b)(6) and (b)(7), above, shall expire two years after the expiration of the terms of office of the persons selected pursuant to subsections (b)(1) and (b)(2), above. Each member selected after the initial terms of office have expired shall serve a term of three years or until the termination of his or her membership in the organization from which he or she was selected, whichever shall occur first.

(f) *Background Checks.* Members shall be subject to investigation sufficient to confirm their educational and employment histories and any history of criminal convictions.

(g) *Vacancies.* Any vacancy on the board of ethics occurring before the end of the term of the departing member shall be filled in the same manner as the original selection for the remainder of the regular term.

(h) *Political Activities.* Members of the board of ethics, during their term of office, are prohibited from making contributions to the political campaigns of any candidate for a county office.

(i) *Duties.* The duties of the board of ethics shall be:

(1) to establish procedures, rules, and regulations for its internal organization and the conduct of its affairs, consistent with the provisions of this code of ethics;

(2) to render advisory opinions, not more than 30 days after receiving a request to do so, with respect to the interpretation and application of this code of ethics, to any officer or employee who requests such an advisory opinion as to whether a particular course of conduct would constitute a violation of the standards imposed herein, which requests shall be in writing. In any subsequent complaint concerning the same officer or employee and same conduct which is the subject of an advisory opinion rendered by the board of ethics, the board of ethics shall be bound to follow the advisory opinion, unless it is established that material facts were omitted or misstated in the request for same;

(3) to conduct its proceedings in meetings open to the public;

(4) to prescribe forms necessary to carry out any function prescribed by this code of ethics;

(5) to make available to the public information disclosed pursuant to this code of ethics;

(6) to receive, hear, investigate, and make findings concerning complaints of violations of this code of ethics, and to hold hearings in connection therewith as the board or ethics may deem necessary; and

(7) to recommend to the board of commissioners revisions of this code of ethics.

(j) Neither the board of commissioners nor any officer or employee shall engage in any conduct designed to interfere with or improperly influence the members of the board of ethics in the performance of their duties under this code of ethics.

Sec. 2-81. Hearings and procedures.

(a) Any person may initiate a complaint of a violation of this code of ethics by submitting to the secretary to the board of ethics, a written, sworn complaint under penalty of perjury, upon a form prescribed by the board of ethics.

(b) The board of ethics may also initiate an investigation on its own initiative if it deems such action necessary.

(c) Within five days following the filing of a complaint, the subject of the complaint shall be notified of the existence and nature of the complaint.

(d) The board of ethics shall, within 30 days following the filing of a complaint or initiation of an investigation on it own initiative, conduct a hearing to determine whether probable cause exists to believe there has been a violation of this code of ethics. If the board of ethics determines by majority vote that probable cause does not exist, the complaint shall be dismissed or the investigation terminated and the parties will be so advised in writing. If the board of ethics determines that probable cause does exist, the involved parties shall be so advised in writing.

(e) When probable cause is found to exist, the board of ethics shall schedule a formal hearing to consider the complaint. The board of ethics shall notify all involved parties in writing of the time and place of the hearing, which hearing shall not be held sooner than 10 days following notice of same.

(f) Hearings shall be public, and all parties shall have the opportunity to be heard, to summon witnesses, and to present evidence. Persons alleged to have violated this code of ethics shall have the right to be represented by counsel at their own expense.

(g) The board of ethics shall have the power to compel the attendance of witnesses and the production of records by subpoena, and to take testimony under oath. Fulton County shall bear the costs of issuing subpoenas and, if desired by the board of ethics, the cost of having a court reporter present to record hearings. Any matters related to enforcing or quashing subpoenas may be submitted to the superior court of Fulton County.

(h) At the conclusion of the hearing, the board of ethics shall deliberate upon its findings in public and shall determine its findings by majority vote. Findings that a violation of this code of ethics has occurred must be based upon a preponderance of the evidence. The board of ethics' decision shall be reduced to writing and provided to the parties, which decision shall be final; provided, however, that the decision shall be subject to review by writ of certiorari to the superior court of Fulton County.

Sec. 2-82. Violations.

(a) Any intentional violation of this code of ethics, the furnishing of false or misleading information to the board of ethics, the failure to follow an opinion or decision issued by the board of ethics, or the failure to comply with a subpoena issued by the

board of ethics, as determined by the board of ethics after notice and the right to be heard in accordance with the hearing requirements of this code of ethics, shall subject the violator to:

(1) an administrative sanction not to exceed $1,000.00, which sanction shall be deposited into the general fund of Fulton County; and/or

(2) a public reprimand.

(b) In addition to those sanctions provided for at subsection (a), with regard to a violation of this code of ethics committed by an employee of Fulton County, the board of ethics may recommend to the board of commissioners or the appropriate appointing authority disciplinary action in accordance with the personnel rules and regulations of Fulton County.

(c) In addition to those sanctions provided for at subsection (a), with regard to a violation of this code of ethics committed by any person, business, or other entity, the board of ethics may recommend to the purchasing agent that debarment proceedings be commenced in accordance with applicable ordinances of Fulton County.

Sec. 2-83. Secretary to the board of ethics / Legal counsel

(a) The board of ethics shall select a secretary, whose duties shall include the receiving and filing of complaints and requests for advisory opinions, and the maintaining of all records and minutes of the meetings and proceedings of the board of ethics. Not longer than five (5) business days following each meeting of the board of ethics, the secretary shall provide the clerk to the commission with a copy of all such records and minutes. The secretary shall be under contract with Fulton County to provide such services to the

board of ethics and shall be compensated from funds approved by the board of commissioners.

(b) The board of ethics shall be represented by independent legal counsel, selected by the board of ethics from those attorneys admitted to practice law in the State of Georgia. Said legal counsel shall be under contract with Fulton County to provide such services to the board of ethics and shall be compensated from funds approved by the board of commissioners.

Sec. 2-84. Lobbyist Registration.

(a) Every lobbyist, as defined in section 2-67, and who is required by the laws of the State of Georgia to be registered with the State Ethics Commission, shall also register with Fulton County. Registration with Fulton County shall be complete upon the filing of a copy of such person's registration filed with the State Ethics Commission, including each renewal of and supplement to same, with the Fulton County board of ethics. Each such registration, as well as each renewal of and supplement to such registration filed with the State Ethics Commissions, shall be filed with the board of ethics not more than three (3) business days following the applicable deadline for filing same with the State Ethics Commission.

(b) The registration required by this code section shall not apply to:

(1) Any person who expresses personal views, on that individual's own behalf, to the board of commissioners or any member thereof;

(2) Any officer or employee of Fulton County, or any officer or employee of any other governmental agency or non-profit entity which is funded or partially funded by Fulton County, who appears before or provides

information to the board of commissioners or a member thereof at the request of the board or a member thereof;

(3) Any licensed attorney appearing before the board of commissioners on behalf of a client in any adversarial proceeding before the board, as well as any witness appearing in such a proceeding for the purpose of giving testimony;

(4) Any elected official performing the official duties of their office; and

(5) Any person employed or appointed by a registered lobbyist, but who is not a lobbyist as defined at section 2-67.

Sec. 2-85. Lobbyist Disclosure Reports.

Every lobbyist, as defined in section 2-67, and who is required by the laws of the State of Georgia to file disclosure reports with the State Ethics Commission, shall also file such disclosure reports with Fulton County. This requirement shall be complete upon the filing of a copy of each such disclosure report filed with the State Ethics Commission with the Fulton County board of ethics. Each such disclosure report shall be filed with the board of ethics not more than three (3) business days following the applicable deadline for filing same with the State Ethics Commission.

Sec. 2-86. Denial, suspension, or revocation of registration; reinstatement; administrative sanction. *(Added 7/20/05, item no. 05-0867)*

(a) In addition to other penalties provided in this code of ethics, the board of ethics may by order deny, suspend, or revoke for a period not to exceed one year the registration of a lobbyist if it finds that the lobbyist:

(1) Has filed an application for registration with the board of ethics which was incomplete in a material respect or contained a statement that was, in light

of the circumstances under which it was made, false or misleading with respect to a material fact;

(2) Has willfully violated or willfully failed to comply with section 2-84 and section 2-85;

(3) Has failed to comply with the reporting requirements of section 2-85; or

(4) Has engaged in lobbying practices in violation of section 2-84 and section 2-85.

(b) Application may be made to the board of ethics for reinstatement. Such reinstatement shall be conducted in the same manner as required for an initial registration under section 2-84 and shall be conditioned upon payment of any outstanding penalty or fees.

(c) Any person failing to comply with or violating any of the provisions of section 2-84 and section 2-85 shall be subject to an administrative sanction by the board of ethics not to exceed $1,000.00 per violation.

Appendix 3: Signed Certifications

Certifications

1. **Affirmatively furthering fair housing**. Fulton County certifies that it will affirmatively further fair housing, which means that it will conduct an analysis to identify impediments to fair housing choice within the jurisdiction, take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting the analysis and actions in this regard.

2. **Anti-displacement and relocation plan**. Fulton County certifies that it has in effect and is following a residential anti-displacement and relocation assistance plan.

3. **Anti-lobbying.** Fulton County must submit a certification with regard to compliance with restrictions on lobbying required by 24 CFR part 87, together with disclosure forms, if required by that part.

4. **Authority of applicant.** Fulton County certifies that it possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations and other program requirements.

5. **Acquisition and relocation.** Fulton County certifies that it will comply with the acquisition and 88 relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (42 U.S.C. 4601), and implementing regulations at 49 CFR part 24, except as those provisions are modified by the notice for the NSP2 program published by HUD.

6. **Section 3.** Fulton County certifies that it will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u), and implementing regulations at 24 CFR part 135.

7. **Citizen participation.** Fulton County certifies that it is carrying out citizen participation in accordance with NSP2 requirements.

8. **Use of funds.** The Fulton County certifies that it will comply with Title III of Division B of the Housing and Economic Recovery Act of 2008, as modified by the American Reinvestment and Recovery Act by spending 50 percent of its grant funds within 2 years, and spending 100 percent within 3 years, of receipt of the grant.

9. **Fulton County certifies:**

   a. That all of the NSP2 funds made available to it will be used with respect to individuals and families whose incomes do not exceed 120 percent of area median income; and

   b. Fulton County will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108 loan guaranteed funds, by assessing any amount against properties owned and occupied by persons of low- and moderate-income, including any fee charged

or assessment made as a condition of obtaining access to such public improvements. However, if NSP funds are used to pay the proportion of a fee or assessment attributable to the capital costs of public improvements (assisted in part 40 with NSP funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds. In addition, with respect to 89 properties owned and occupied by moderate-income (but not low-income) families, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than NSP funds if the jurisdiction certifies that it lacks NSP or CDBG funds to cover the assessment.

10. **Excessive force.** Fulton County, if an applicable governmental entity, certifies that it has adopted and is enforcing:

a. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in nonviolent civil rights demonstrations; and

b. A policy of enforcing applicable state and local laws against physically barring entrance to, or exit from, a facility or location that is the subject of such nonviolent civil rights demonstrations within its jurisdiction

11. **Compliance with anti-discrimination laws**. Fulton County certifies that the NSP grant will be conducted and administered in conformity with Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d), the Fair Housing Act (42 U.S.C. 3601-3619), and implementing regulations.

12. **Compliance with lead-based paint procedures**. Fulton County certifies that its activities concerning lead-based paint will comply with the requirements of 24 CFR part 35, subparts A, B, J, K, and R.

13. **Compliance with laws**. Fulton County certifies that it will comply with applicable laws.

Zachary Williams, County Manager

7/16/09

Official Date

Appendix 4: Calculation of Removal of Negative Effects

CALCULATION OF REMOVAL OF NEGATIVE EFFECTS

USING HUD RUBRIC

Department of Housing and Community Development
Fulton County, Georgia

Minimum vacant properties to be rehabilitated = 120

X 1.5

180

Sum total of all vacant properties in area* = 855

FORMULA:

Sum total of vacant properties to be addressed x 1.5 divided by sum total of all vacant residential properties in area

120 x 1.5 = 180 divided by 855 = .21

* Vacancy numbers were calculated by census tracts based on HUD Data sets, using percentage of vacancies related to total mortgages.

Appendix 5: Summary of Citizen Comments

SUMMARY OF CITIZEN COMMENTS

There were no citizen comments.

The URL where the plan was posted was:

http://www.fultoncountyga.gov/content/view/1633/1/

The plan was also printed in the Daily Report, the legal organ for Fulton County in a full page ad that ran June 19, 2009. A copy of that page is included.

PUBLIC NOTICE

Citizen Review and Comment Period
June 22, 2009 – July 1, 2009
Fulton County Neighborhood Stabilization Program (NSP2) Draft Plan
As required by the U.S. Department of Housing and Urban Development (HUD),
Fulton County is conducting a 10 day citizen review and comment period.

NOTICE IS HEREBY GIVEN that Fulton County is requesting public comment on its draft NSP2 Plan. Fulton County is requesting $15,489,375.00 for funding under the Neighborhood Stabilization Program (NSP2). Funding is provided through the US Department of Housing and Urban Development (HUD) Community Development Block Grant (CDBG) program. The federal Neighborhood Stabilization Program is authorized under the American Recovery and Reinvestment Act (the Recovery Act) of 2009, and provides grants to states, local governments, nonprofits and a consortium of nonprofit entities on a competitive basis.

The purpose of NSP2 is to address the impact of abandoned and foreclosed homes in our neighborhoods and communities. All funds must be awarded and administered in compliance with the federal NSP requirements. A total of 1.93 billion in NSP2 funding is available nationally to carry out neighborhood stabilization programs. NSP2 funds will be awarded through competitions whose eligible applicants including states, units of general local government, nonprofits, and consortia of nonprofits. The deadline for applications is July 17, 2009. Eligible activities include the acquisition and renovation of foreclosed properties for resale; the creation or expansion of financial programs such as a soft-seconds, loan loss reserves, and shared equity loans; the establishment of land banks; and the demolition of blighted structures. Not less than 25% of the funding must benefit households with incomes at or below 50% of the area median.

Proposed NSP2 County Funded Activities:

Activities	Estimated Amount	Responsible Entity
Purchase and rehabilitate a minimum of 100 homes and residential properties that have been abandoned or foreclosed upon, in order to sell or rent (Assumption: $120,000 per home)	$12,000,000	Fulton County
Purchase and rehabilitate at least 100 homes or residential properties that have been abandoned or foreclosed upon, in order to rent to those below 50% of area median income (Assumption: $15,000 per home)	$1,500,000	Fulton County
Establish financing mechanisms for purchase (Assumption: Down payment assistance for 75 borrowers at $7,500 each)	$562,500	Fulton County
Provide housing counseling for 75 home buyers (Assumption: $250 per buyer)	$18,750	Fulton County
ACTIVITY TOTAL	$14,081,250	Fulton County
Administrative costs in accordance with 24CFR 570.205 or 206	$1,408,125	Fulton County
PROGRAM TOTAL	$15,489,375.00	Fulton County

Fulton County Government promotes fair housing and equal access by marketing all programs to low and moderate income families regardless of age, race, color, religion, sex, national origin, sexual orientation, marital status, or disability. Information about the Fulton County Neighborhood Stabilization Program and a draft summary of the NSP2 Plan will be available for review on the County website at www.fultoncountyga.gov and at the below locations.

These documents are available in alternate formats upon request by contacting the Department of Housing and Community Development at 404-612-8080. TTY users may Dial 711 and give the Georgia Relay Communications Assistant the preceding number.

CONTACT INFORMATION:

Fulton County
Department of Housing and Community Development
141 Pryor Street, S.W., Suite 5001
Atlanta, GA 30303
Phone: 404.612.8080
Fax: 404.612.8112

A draft summary of the NSP2 Plan is available for review at the following locations:

1. Fulton County Department of Housing and Community Development 141 Pryor St., SW, Suite 5001
2. South Fulton County Service Center
   5600 Stonewall Tell Road
3. North Fulton County Service Center
   7741 Roswell Road
4. Adamsville Collier Heights Library
   3424 Martin Luther King Jr., Drive
5. Southwest Library
   3665 Cascade Road SW Atlanta, GA 30331
6. Fulton County Web site: www.fultoncountyga.us

For Publication on June 19, 2009

Appendix 6: Definitions

DEFINITIONS FOR PURPOSES OF NSP2

a. BLIGHTED STRUCTURE:

Fulton County does not have a formal definition of "blighted structure." The State of Georgia has adopted a definition of "blighted property, blighted, or blight" which the County will apply to NSP2. The State of Georgia's definition applies to any urbanized or developed property which:

(A) Presents two or more of the following conditions:

(i) Uninhabitable, unsafe, or abandoned structures;

(ii) Inadequate provisions for ventilation, light, air, or sanitation;

(iii) An imminent harm to life or other property caused by fire, flood, hurricane, tornado, earthquake, storm or other natural catastrophe respecting which the Governor has declared a state of emergency under state law or has certified the need for disaster assistance under federal law; provided, however, this division shall not apply to property unless the relevant public agency has given notice in writing to the property owner regarding specific harm caused by the property and the owner has failed to take reasonable measures to remedy the harm;

(iv) A site identified by the federal Environmental Protection Agency as a Superfund site pursuant to 42 U.S.C. Section 9601, et seq., or environmental contamination to an extent that requires remedial investigation or a feasibility study;

(v) Repeated illegal activity on the individual property of which the owner knew or should have known: or

(vi) The maintenance of the property is below state, county, or municipal codes for at least one year after notice of the code violation; and

(B) Is conducive to ill health, transmission of disease, infant mortality, or crime in the immediate proximity of the property.

b. AFFORDABLE RENTS:

The County will use the fair market rents for the metropolitan Atlanta area as determined and updated by HUD each year and adjusted for utilities as the standard for rental affordability under the program. The current figures listed below were effective October 1, 2008.

	0	1BR	2BR	3BR	4BR
FMR	$729	$789	$878	$1,068	$1,167

c. HOUSING REHABILITATION STANDARDS:

Fulton County has adopted the 2006 International Residential Code as prepared by the International Code Council as its housing standard for residential properties. All

rehabilitation funded with NSP2 will be completed up to the standards outlined in this Code. Most of the municipalities in Fulton County have also adopted this Code as their standard as has the State of Georgia. In the event an NSP2 project is undertaken in a municipality with a more stringent standard than that of the 2006 International Residential Code, the more stringent standard will be followed. At a minimum, all work completed under NSP2 will be carried out in conformance with the 2006 International Residential Code and will also meet all applicable lead-based paint standards as outlined in 24 CFR Part 35.

All construction will also meet the accessibility standards at 24 CFR part 8, and will be made energy efficient and incorporate cost effective green improvements. All gut rehabilitation of residential buildings up to three stories will be designed to meet the standard of Energy Star Qualified New Homes. All gut rehabilitation of mid or high rise multi family housing will be designed to meet American Society of Heating, Refrigerating, and Air-Conditioning Engineers (ASHRAE Standard 90.1-2004, Appendix G plus 20 percent. Other rehabilitation will meet these standards to the greatest extent applicable to the rehabilitation work undertaken. At a minimum, all older obsolete products and appliances will be replaced including windows, doors, lighting, water heaters, furnaces, boilers, air conditioning units, refrigerators, clothes washers, and dishwashers with Energy Star-labeled products. Toilets, showers, and faucets will be replaced with water-efficient products such as those with the WaterSense label.

Appendix 7: Foreclosure and Vacancy Scores for Target Areas

FORECLOSURE AND VACANCY SCORES FOR TARGET AREAS

Census Tract	Foreclosure Score	Vacancy Score	Max Score
103.01	20	14	20
103.04	20	14	20
105.07	20	16	20
105.08	18	12	18
105.09	20	16	20
105.10	20	16	20
105.11	19	17	19
105.12	19	19	19
105.13	20	19	20
105.14	20	15	20
106.04	19	20	20
113.04	17	18	18
Average			**19.5**