



## SANDY SPRINGS

GEORGIA

To: John McDonough, City Manager

From: Michelle Alexander, Director of Community Development

Date: February 22, 2017 for Submission onto the March 7, 2017 City Council Meeting

Subject: Approve 2017 Draft CDBG Annual Action Plan for 30-day Comment Period & permission to submit attached minor Amendment to Consolidated Plan to identify intent to pursue Section 108 Loan.

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### ***Department of Community Development Recommendation***

Advertise draft 2017 CDBG Annual Action Plan for 30-day public comment period.  
Permission to submit minor Amendment to Consolidated Plan.

### ***Background***

The 30-day public comment period affords residents an opportunity to comment on proposed projects and activities for 2017.

### ***Discussion***

The 2017 Annual Action Plan public hearing was held on February 7, 2017. The draft Action Plan and the Amendment to the Consolidated Plan is attached for comment, with updates identified in yellow highlight. A final draft will be submitted to Council for approval on May 2, 2017. Staff recommends committing 2017 CDBG funds to the South Roswell Road Multiyear Sidewalk construction project, which will target the areas along Northridge Drive between Roswell Road and GA-400 to complete pedestrian lighting and between I-285 and Long Island Drive to complete streetscape improvements. Additionally, Staff recommends amendment on 2017 Annual Action Plan and Consolidated Plan to include intent to apply for the Section 108 loan.

### ***Financial Impact***

The City has not yet been notified of the 2017 CDBG funds award, but expects to receive the award letter by mid-March 2017.

### ***Attachment(s)***

PowerPoint slide  
2017 Draft CDBG Annual Action Plan  
2013-2017 Draft Amendment to Consolidated Plan  
IDIS Online Access Request

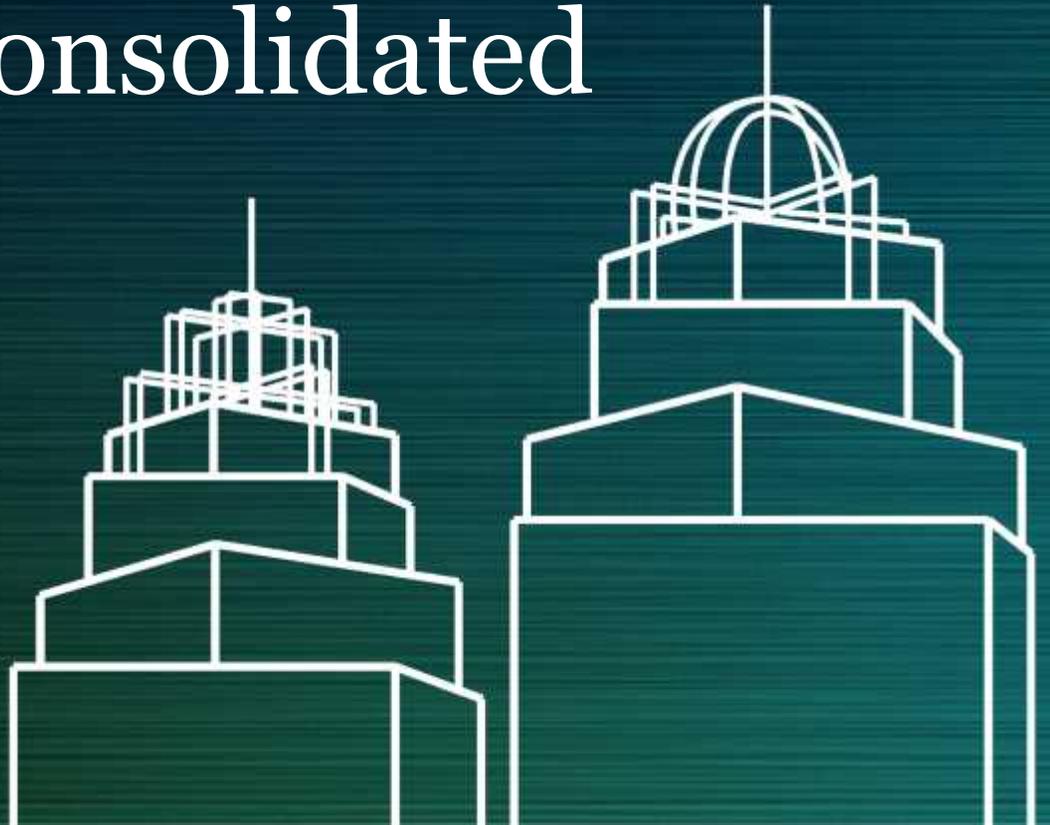
# Draft Action Plan for 30-day Public Comment & Permission to Submit Minor Amendment to Consolidated Plan

City Council Regular Meeting

March 7, 2017



SANDY SPRINGS  
GEORGIA



## CDBG Annual Action Plan – Proposed Projects

- **Phase 3 of the South Roswell Road Multiyear Sidewalk Project includes:**
  - Sub-phase 1 – (Roswell Road From Long Island Drive to Prado)
  - Sub-phase 2 (Roswell Road from Lake Placid Drive to Northwood Drive)

This project focus will be to improved connectivity in CDBG target areas along the Roswell Road transportation corridor.

## CDBG Annual Action Plan – Proposed Projects

- **February 7, 2017** – Public Hearing
- **March 7, 2017** – Public Meeting
  - City Council consent to advertise draft for 30-days
  - City Council consent to submit minor amendment to Consolidated Plan to include Section 108 loan
- **March 10, 2017** – Draft plan available for review until April 10<sup>th</sup>
- **May 2, 2017** – Council Action on Plan
- On or before **May 15, 2017** – Submit plan to HUD

## Amendment to Consolidated Plan

- The City seeks to amend the Consolidated Plan to include the pursuance of Section 108 loan in order to obtain alternative financing to complete the Phase 3 of the South Roswell Road Multiyear Project more efficiently and as a single effort.

**DRAFT**  
**2017 Annual Action Plan**  
**Sandy Springs, GA**



**Submitted (TBD)**

**U.S. Department of Housing and Urban Development  
Atlanta Regional Office  
Five Points Plaza Building  
40 Marietta Street  
Atlanta, GA 30303**



Annual Action Plan  
2017

# Executive Summary

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

### 1. Introduction

The Annual Action Plan provides a concise summary of the actions, activities, and the specific federal and non-federal resources that will be used each year to address the priority needs and specific goals identified by the Consolidated Plan. The Consolidated Plan is a 5-year plan which describes the City's community development priorities and multiyear goals based on an assessment of housing and community development needs, an analysis of housing and economic market conditions, and available resources.

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

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.

The Needs Assessment identified Public Improvements and Infrastructure and Public Service as the priority needs for the City. The City has determined that completion of the Roswell Road Multiyear Sidewalk Project, begun under the previous Consolidated Plan, will be the initial project for the 2013-2017

Consolidated Plan. The CDBG Program for this project will fulfill the Suitable Living Environment objective and Availability/Accessibility outcome of the CPD Performance Measurement Framework. Any future Public Service projects will also be required to fulfill one of the three objectives [(1) Decent, Affordable Housing, (2) Suitable Living Environment, and (3) Economic Opportunities] and the three outcomes [(1) Availability/Accessibility, (2) Affordability, and (3) Sustainability].

### 3. Evaluation of past performance

This is an evaluation of past performance that helped lead the grantee to choose its goals or projects.

The City of Sandy Springs began its participation in HUD's CDBG Program in 2008 and the City's 2008-12 plan identified a single priority for the first five years of its program: infrastructure improvements. Consequently, a multiyear sidewalk program was developed for the Roswell Road corridor between Dalrymple Road and the Chattahoochee River. The Roswell Road Multiyear Sidewalk Project was completed in May 2015.

In, March 2016 the City completed Phases 1 and 2 of the construction of sidewalks in the southern part of the City along Roswell Road within the eligibility area. For 2017, the City will continue with Phase 3 of

the South Roswell Road Multiyear Project, specifically the area south of Interstate 285, which will include right-of-way appraisals, and acquisition, installation of pedestrian lighting, handicapped ramps and brick pavers from I-285 down to Long Island Drive. Additionally, the City seeks to pursue the Section 108 loan to obtain alternative financing to complete the aforementioned projects more efficiently and as a single effort.

#### **4. Summary of Citizen Participation Process and consultation process**

Summary from citizen participation section of plan.

The City of Sandy Springs adopted its Citizen Participation Plan in 2006. The plan serves as the City's official policy for involving the community in the development of all planning documents related to the CDBG program, and the evaluation of the program's annual performance.

In conformance with the Citizen Participation Plan, the City anticipates holding the required public hearings and meetings to solicit comments on community needs as part of the development of the Annual Action Plan. Those meetings are as follows:

1. Public Hearing and Program Update on Tuesday, February 7, 2017, at 6:00 p.m. (Sandy Springs City Hall)
2. Draft Review and Public Comment Period Announcement on Tuesday, March 7, 2017, at 6:00 p.m. (Sandy Springs City Hall)
3. Public Hearing and Annual Action Plan Adoption on Tuesday, May 2, 2017, at 6:00 p.m. (Sandy Springs City Hall)

In addition to receiving public comments and consulting with these agencies, the City of Sandy Springs has maintained a webpage dedicated to the CDBG Program and the planning and reporting documents in an effort to broaden public participation in the City's process, . The City also has a dedicated email address (cdbgprogram@sandyspringsga.gov) to allow for questions or comments to be sent to the City on any aspect of the CDBG program to give the community easy access to CDBG Program information

#### **5. Summary of public comments**

#### **6. Summary of comments or views not accepted and the reasons for not accepting them**

#### **7. Summary**

## PR-05 Lead & Responsible Agencies – 91.200(b)

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

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

Agency Role	Name	Department/Agency
Lead Agency	SANDY SPRINGS	
CDBG Administrator	SANDY SPRINGS	Department of Community Development
HOPWA Administrator		
HOME Administrator		
HOPWA-C Administrator		

Table 1 – Responsible Agencies

### Narrative (optional)

The City of Sandy Springs', Community Development Department, is the lead agency responsible for planning, implementation and performance reporting for the Community Development Block Grant (CDBG) Program that is covered by this Annual Action Plan. The City will be the administrator of all projects, programs and other activities funded with annual CDBG entitlement funds.

#### City of Sandy Springs Department of Community Development

7840 Roswell Road, Building 500  
Sandy Springs, GA 30350  
770-730-5600  
[www.sandyspringsga.gov](http://www.sandyspringsga.gov)

Michelle Alexander, *Director of Community Development*  
Ginger Sottile, *Manager of Planning & Zoning*

### Consolidated Plan Public Contact Information

E-mail: [cdbgprogram@sandyspringsga.gov](mailto:cdbgprogram@sandyspringsga.gov) or call 770-730-5600

Website: [www.sandyspringsga.gov/city-services/urban-development/planning-and-zoning/cdbg](http://www.sandyspringsga.gov/city-services/urban-development/planning-and-zoning/cdbg)

## **AP-10 Consultation – 91.100, 91.200(b), 91.215(I)**

### **1. Introduction**

The City's Citizen Participation Plan, adopted in 2006, served as the first step in the qualification process for the CDBG program. The plan serves as the City's official policy for involving the community in the development of all planning documents related to the CDBG program and the evaluation of the program's annual performance. As required by the Citizen Participation Plan, the City consulted with a broad spectrum of service providers, nonprofit agencies and residents in the identification of community needs that may be eligible for consideration as five-year goals for the Consolidated Plan and the CDBG program. For the Annual Action Plan, the City contacted local public service agencies & advertised the required public hearing as outlined in the Citizen Participation Plan.

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

In conformance with the Citizen Participation Plan, the City anticipates holding the required public hearings and meetings to solicit comments on community needs as part of the development of the Annual Action Plan. Those meetings are as follows:

1. Public Hearing and Program Update on Tuesday, **February 7, 2017, at 6:00 p.m.** (Sandy Springs City Hall)
2. Draft Review and Public Comment Period Announcement **on Tuesday, March 7, 2017,** at 6:00 p.m. (Sandy Springs City Hall)
3. Public Hearing and Annual Action Plan Adoption on Tuesday, **May 2, 2017, at 6:00 p.m.** (Sandy Springs City Hall)

The City of Sandy Springs has maintained a webpage dedicated to the CDBG Program and its planning and reporting documents in an effort to broaden public participation in the City's process. The City also has a dedicated email address ([cdbgprogram@sandyspringsga.gov](mailto:cdbgprogram@sandyspringsga.gov)) to allow for questions or comments to be sent to the City on any aspect of the CDBG program to give the community easy access to CDBG Program information.

**Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness.**

The Metro Atlanta Tri-Jurisdictional Collaborative Continuum of Care was dissolved in 2013, this led to the creation of Fulton County Homeless Continuum of Care (CoC) in 2014. Since the creation of the CoC, board have been created and members were appointed in 2015. The City of Sandy Springs will continue to support the efforts of Fulton County CoC.

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

N/A

**2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdiction's consultations with housing, social service agencies and other entities**

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

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Fulton County Homeless Continuum of Care	The common goal is to find more specific homeless data for Sandy Springs. There is no new data because Fulton County CoC was just established 2014 and board members were just appointed in 2015.

**Table 2 – Other local / regional / federal planning efforts**

## **AP-12 Participation – 91.105, 91.200(c)**

### **1. Summary of citizen participation process/Efforts made to broaden citizen participation Summarize citizen participation process and how it impacted goal-setting**

The City of Sandy Springs adopted its Citizen Participation Plan in 2006. The plan serves as the City's official policy for involving the community in the development of all planning documents related to the CDBG program, and the evaluation of the program's annual performance.

In conformance with the Citizen Participation Plan, the City anticipates holding the required public hearings and meetings to solicit comments on community needs as part of the development of the Annual Action Plan. Those meetings were as follows:

3. Public Hearing and Program Update on February 7, 2017 at 6:00 p.m. (Sandy Springs City Hall)

4. Draft Review and Public Comment Period Announcement on March 7, 2017 at 6:00 p.m. (Sandy Springs City Hall)

5. Annual Action Plan Adoption on May 2, 2017 at 6:00 p.m. (Sandy Springs City Hall)

A summary of the public hearing **minutes will be provided in** the Appendix once received.

The City of Sandy Springs has maintained a webpage dedicated to the CDBG Program and the planning and reporting documents in an effort to broaden public participation in the City's process. The City also has a dedicated email address ([cdbgprogram@sandyspringsga.gov](mailto:cdbgprogram@sandyspringsga.gov)) to allow for questions or comments to be sent to the City on any aspect of the CDBG program and to give the community easy access to CDBG Program information

## Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Internet Outreach	<p>Minorities</p> <p>Non-English Speaking - Specify other language: Spanish</p> <p>Persons with disabilities</p> <p>Non-targeted/broad community</p> <p>Residents of Public and Assisted Housing</p>		None		
2	Newspaper Ad	Non-targeted/broad community		None		
3	Newspaper Ad	Non-English Speaking - Specify other language: Spanish		None		

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
4	Public Hearing	<p>Minorities</p> <p>Non-English Speaking - Specify other language: Spanish</p> <p>Persons with disabilities</p> <p>Non-targeted/broad community</p> <p>Residents of Public and Assisted Housing</p>		<p>None received from the 02/07/2017</p> <p>Public Hearing</p>		

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
5	Public Hearing	Minorities Non-English Speaking - Specify other language: Spanish Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing		<b>03/07/2017 Meeting</b>		

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
6	Public Hearing	Minorities Non-English Speaking - Specify other language: Spanish Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing		<b>05/02/2017</b> <b>Public</b> <b>Hearing</b>		

**Table 3 – Citizen Participation Outreach**

## Expected Resources

### AP-15 Expected Resources – 91.220(c) (1, 2)

#### Introduction

The City anticipates that the funds available in 2017 for the selected Capital Improvement Project (CIP) project will come from the Community Development Block Grant (CDBG) funds. The city also anticipates pursuing the Section 108 loan in order to obtain alternative financing resources to complete the Roswell Road Multiyear Sidewalk Project more efficiently and as a single effort. These funds will be used for the continued design and construction of pedestrian lighting and streetscapes as part of the South Roswell Road Multiyear Sidewalk Project in the City’s CDBG target areas that are designated Low and Moderate Income (LMI) Census Tracts as shown on the attached map (Exhibit C) [see section AP-35, Projects for detailed description]. The Section 108 funds will be used to complete Phase 3, which includes the Right-of-way appraisals and acquisition, installation of street lighting, handicapped ramps, and brick pavers along Roswell Road from I-285 down to Long Island Drive.

#### Priority Table

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	TBD	0	592,429	592,429	820,103	Priority to be given to infrastructure projects in LMI target areas.

Table 4 - Expected Resources – Priority Table

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

N/A

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

During Phase 2 of City's South Roswell Road Multiyear Sidewalk Improvements project the City didn't anticipate the need for land acquisition because all improvements were to take place in the public right-of-way. As the City has begun work on Phase 3 of this project, Northridge Pedestrian Lighting and Roswell Road Streetscape, right-of-way acquisition will be required which commenced in the third and fourth quarters of 2016 and IT is anticipated to continue in 2017.

## Annual Goals and Objectives

### AP-20 Annual Goals and Objectives - 91.420, 91.220(c)(3)&(e)

#### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Public Improvements & Infrastructure	2013	2017	Non-Housing Community Development	40.7% LMI Census Tracts	Public Improvements & Infrastructure		Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 4311 Persons Assisted

Table 5 – Goals Summary

#### Goal Descriptions

1	<b>Goal Name</b>	Public Improvements & Infrastructure
	<b>Goal Description</b>	South Roswell Road Multi-year Sidewalk Project: Phase 3 - Northridge Pedestrian Lighting and Roswell Road Streetscape

Table 6 – Goal Descriptions

**Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.215(b):**

None.

## AP-35 Projects – 91.220(d)

### Introduction

The City of Sandy Springs began its participation in HUD’s CDBG Program in 2008 and the City’s 2008-12 plan identified a single priority for the first five years of its program: infrastructure improvements. Consequently, a multiyear sidewalk program was developed for the Roswell Road corridor between Dalrymple Road and the Chattahoochee River. The Roswell Road Multiyear Sidewalk Project was completed in May 2015.

In, March 2016 the City completed Phases 1 and 2 of the construction of sidewalks in the southern part of the City along Roswell Road within the eligibility area. For the remainder of 2016, the City commenced with the design of pedestrian lighting and streetscape in the southern part of the City along Roswell Road within the eligibility area, and will continue with its construction in 2017. This is consistent with the Strategic Plan section of the 2013-2017 Consolidated Plan.

#	Project Name
1	South Roswell Road Multi-year Sidewalk Project: Phase 3 - Northridge Pedestrian Lighting and Roswell Road Streetscape

Table 7 – Project Information

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

Funding priorities are consistent with those outlined in the Strategic Plan as it pertains to the proposed use of the CDBG funds for pedestrian improvements; the main obstacle is related to funding. Although the area had adequate right-of-way to accommodate the sidewalk plan in Phases 1 and 2, the City with limited financial resources anticipates the need for additional funds to complete Phase 3 of this project which includes pedestrian lighting, street scape, and the need for some right-of-way acquisition. Traditionally, sidewalk projects in the Sandy Springs area have been completed in conjunction with development or redevelopment projects. Because the target area is built-out with less likelihood of redevelopment than other areas of the City, relying upon development to meet the mobility needs of the area is not an option.

## Projects

### AP-38 Projects Summary

#### Project Summary Information

<b>#</b>	<b>Project Name</b>	South Roswell Road Multiyear Sidewalk Project
	<b>Target Area</b>	South Roswell Road Multiyear Sidewalk Project
	<b>Goals Supported</b>	Public Improvements & Infrastructure
	<b>Needs Addressed</b>	Public Improvements & Infrastructure
	<b>Funding</b>	CDBG: \$592,429
	<b>Description</b>	Phase 3 of the South Roswell Road Multiyear Project will include the design, construction, and installation of pedestrian lighting between Roswell Road and GA-400 on Northridge Drive. This phase will also include the design, inclusive of environmental work, and right-of-way acquisition for street scape improvements along Roswell Rd South of I-285 to Long Island Drive. See attached map of the selected areas for the pedestrian sidewalk improvements. Construction will include newly acquired right-of-way, some demolition of existing sidewalks, modification to utility vaults, and other minor alterations.
	<b>Target Date</b>	6/30/2017
	<b>Estimate the number and type of families that will benefit from the proposes activities</b>	4,311 LMI
	<b>Location Description</b>	Roswell Road Corridor in Sandy Springs from Roswell Road to GA-400 on Northridge Road & Roswell Road South of I-285 to Long Island Drive
	<b>Planned Activities</b>	The goal of South Roswell Road Sidewalk Project is to complete the sidewalk network in the qualified target areas along the Roswell Road corridor from Interstate 285 to Long Island Drive to improve pedestrian access to commercial and retail services, City parks, public transit, the North Fulton County Service Center and other services. To complete this

		<p>project, damaged walkways will be replaced and areas lacking sidewalks will have new sidewalks installed. All sidewalk improvements will meet the ADA design standards, along with the City's Suburban Overlay District Standards. The overlay district standards require paving accents, street lighting, landscaping and other improvements to complete the sidewalk network.</p>
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**Table 8 – Project Summary**

## **AP-50 Geographic Distribution – 91.220(f)**

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

The South Roswell Road Sidewalk Project will complete the sidewalk streetscape improvements in the qualified target areas along the Roswell Road corridor from Interstate 285 to Long Island Drive, specifically within Census Tract 102.12 and the pedestrian lighting improvements along Northridge Drive between Roswell Rd and GA-400, specifically within Census Tracts 101.18 and 101.19.

### **Geographic Distribution**

<b>Target Area</b>	<b>Percentage of Funds</b>
40.7% LMI Census Tracts	100

**Table 9 - Geographic Distribution**

### **Rationale for the priorities for allocating investments geographically**

The geographic allocation of the City's CDBG funds is being guided by the determination that these funds can have the greatest impact when targeted to specific areas. The CDBG LMI target area map is attached (Exhibit C). As provided for in 24 CFR Part 570.208(a)(1)(ii), the City may elect to use these target areas to meet National Objective requirements for selected projects that specifically meet the Area Benefit category of activities.

Exception Status:

It is important to also note that HUD has granted the City of Sandy Springs exception status based on the upper quartile calculation that permits the City to apply an LMI (low/moderate income) Area Benefit threshold of 40.7% to the project activities in the designated target areas. The attached map (Exhibit C) illustrates the U.S. Bureau of the Census Tracts where at least 40.7% of the resident population in Sandy Springs is LMI.

### **Discussion**

The project will improve pedestrian access to jobs, commercial and retail services, City parks, public transit, and other services for the Target Area.

## Affordable Housing

### AP-55 Affordable Housing – 91.220(g)

#### Introduction

According to the 2010 Decennial Census data, approximately 52.4% of the units in the City are renter-occupied. The market conditions do not indicate a need for new unit production. However, the Needs Assessment section of the 2013-2017 Consolidated Plan indicates the availability of affordable units and cost burden are issues. Although the City is not planning to use the CDBG program to provide any additional housing units, a study of existing housing data from the Census and other sources indicates the highest priorities for unmet needs are associated with small related and elderly households.

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

**Table 10 - One Year Goals for Affordable Housing by Support Requirement**

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

**Table 11 - One Year Goals for Affordable Housing by Support Type**

#### Discussion

The City has updated its Comprehensive Plan, which addresses the needs of affordable housing for its low to moderate-income residents and workforce. The City's priority actions set forth in the new Comprehensive Plan include, but are not limited to, promoting workforce and mixed-income housing; considering adopting local workforce housing policies to improve affordability, rental, or for-sale housing units; adopting inclusionary zoning to require a certain share of units to meet specific affordability and/or workforce requirements; and championing employer-assisted housing programs.

## **AP-60 Public Housing – 91.220(h)**

### **Introduction**

The City does not plan to undertake capital improvements that directly affect public housing.

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

The Housing Authority of Fulton County, Georgia (HAFC) was the housing agency for the unincorporated areas of Fulton County prior to the City's incorporation on December 1, 2005. The HAFC operates two public housing properties within the city limits of Sandy Springs: the Allen Road Midrise, a 100-unit senior and disabled housing development at 144 Allen Road, and the Belle Isle apartments, a nine-unit public housing property located at 151 W. Belle Isle Road.

HAFC has been awarded tax credit funding from the Georgia Department of Community Affairs, as well as Rental Assistance Demonstration ("RAD") from the United States Department of Housing and Urban Development ("HUD"). The combined \$10m funding is being used to redevelop the Allen Road Midrise, with construction projected to be completed in 2016. The redeveloped property is being renamed "Sterling Place".

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

The City does not plan to take any actions to encourage resident participation in public housing management and/or homeownership programs at the facilities managed by the Housing Authority of Fulton County (HAFC).

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

N/A

### **Discussion**

Though the City will not undertake any direct public housing activities during 2017, the sidewalk projects made feasible using CDBG funding will improve mobility and accessibility for residents of these public housing properties.

## **AP-65 Homeless and Other Special Needs Activities – 91.220(i)**

### **Introduction**

The Annual Action Plan must include the jurisdiction's strategy for reducing and ending homelessness through:

- (1) Helping low-income families avoid becoming homeless;
- (2) Reaching out to homeless persons and assessing their individual needs;
- (3) Addressing the emergency shelter and transitional housing needs of homeless persons; and
- (4) Helping homeless persons (especially any persons that are chronically homeless) make the transition to permanent housing and independent living.

### **Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs Addressing the emergency shelter and transitional housing needs of homeless persons**

The City will continue to support agencies in the area that provide services to the homeless and other low to moderate-income individuals such as the Fulton County Homeless Continuum of Care (CoC) and the Community Assistance Center (CAC). While the City has not adopted any specific strategies to address homelessness and the priority needs of homeless persons, the City has provided an annual \$100,000 grant from its general fund to the CAC since 2010. These grant funds have been used by the CAC to further its programs for homeless and low and moderate-income individuals. The City's support of the CAC is also extended through the encouragement of its Neighborhood Associations in providing assistance in securing Emergency Shelter Grant funds from the Georgia Department of Community Affairs, as needed. Additionally, the proposed sidewalk project will provide improved access to these types of agencies and supportive services.

### **Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again**

While there are agencies that provide services and housing options to the homeless in Sandy Springs and North Fulton County, the need "gaps" identified in the Metro Atlanta Tri-Jurisdictional Continuum of Care Homeless Census Report cover the metro area – not just Sandy Springs. Therefore, without data

that clearly documents homeless needs specific to Sandy Springs it is difficult to discuss such needs. It is also important to note that according to the "2013 Metro Atlanta Tri-Jurisdictional Collaborative Homeless Census for the Homeless", 84% of the homeless individuals identified were in the City of Atlanta, 11% in DeKalb County and 6% in Fulton County (outside the City of Atlanta). This would lead to an assumption that in comparison to surrounding jurisdictions, Sandy Springs located in Fulton County could be expected to have very few homeless. As such, the City has not proposed a strategy for rapid-rehousing.

**Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.**

The City has not adopted any specific strategies to address homelessness and the priority needs of homeless persons. This is due largely to the lack of existing data on homeless people in the City. Furthermore, the City does not have a strategy at the present time to help families and individuals at risk of becoming homeless.

Additionally, the 2010 Census reported the City had approximately 5,301 residents with a disability. Of the City's disabled population, the largest groups were related to physical disabilities. Although the City is not proposing to add any special needs housing, the plan to improve pedestrian mobility in the target areas will benefit disabled residents as well.

## **Discussion**

For the period of the 2013-2017 Consolidated Plan, the City's strategy for addressing the homeless needs identified is to better document the specific needs of the homeless in Sandy Springs, separate from those reported for the Tri-Jurisdictional area that includes the City of Atlanta, Fulton and DeKalb Counties combined. This is a necessary strategy to develop a measured and thoughtful approach to addressing these needs. The City has been in touch with Fulton County regarding the creation of the new Fulton County Continuum of and will continue to support and work with the County and other cities

to research the current state of homelessness in the community.

<b>One year goals for the number of households to be provided housing through the use of HOPWA for:</b>
Short-term rent, mortgage, and utility assistance to prevent homelessness of the individual or family
Tenant-based rental assistance
Units provided in housing facilities (transitional or permanent) that are being developed, leased, or operated
Units provided in transitional short-term housing facilities developed, leased, or operated with HOPWA funds
Total

## **AP-75 Barriers to affordable housing – 91.220(j)**

### **Introduction**

The City is currently in the process of completing the new Assessment of Fair Housing (AFH,) which will replace the previous Analysis of Impediments (AI). Through the completion of the AFH the City seeks to identify any barriers to fair housing issues, determine factors that contribute to identified issues, and develop a plan to establish fair housing goals.

The City's previous Analysis of Impediments to Fair Housing (AI) outlines "Lack of Available Land for Development" as one of the key issues impacting the development of affordable housing and residential investment.

In addition to a lack of available land, the 2027 Comprehensive Plan Community Assessment notes that the housing stock in Sandy Springs is predominantly multifamily and aging. While the age of the some of the developments in the City makes them inherently affordable, it also makes these units obsolete. The Sandy Springs City Council has adopted policies and regulations such as the Apartment Inspection Ordinance to ensure that property owners are maintaining their properties in a safe and sanitary state consistent with the International Property Maintenance Code and other regulations.

While the City has taken steps towards limiting barriers to affordable housing, such as adopting Zoning Ordinances that allow for mixed-use and mixed-housing developments, the City in its AI highlighted the following recommendation for future policy development:

7. Future Comprehensive Plan updates should analyze opportunities to directly incentivize the inclusion of mixed-income housing in future redevelopment projects consistent with Sandy Springs' policies.

**Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment**

### **Discussion**

The City has updated its Comprehensive Plan, which addresses the needs to affordable housing for its low to moderate-income residents and workforce. The City's priority actions set forth in the new Comprehensive Plan include, but are not limited to, promoting workforce and mixed-income housing; considering adopting local workforce housing policies to improved affordability, rental, or for-sale housing units; adopting inclusionary zoning to require a certain share of units to meet specific affordability and/or workforce requirements; and championing employer-assisted housing programs. The City is also in the process of conducting the new Assessment of Fair Housing (AFH), which provides a

method to identify barriers to affordable housing and other fair housing issues. Future strategies for addressing such barriers could include analyses of building codes, environmental problems, impact fees, and the creation of incentive programs that encourage the development of affordable housing.

## **AP-85 Other Actions – 91.220(k)**

### **Introduction**

The Annual Action Plan must describe the jurisdiction's planned actions to carry out the following strategies outlined in the Consolidated Plan:

- Foster and maintain affordable housing;
- Evaluate and reduce lead-based paint hazards;
- Reduce the number of poverty-level families;
- Develop institutional structure; and
- Enhance coordination.

### **Actions planned to address obstacles to meeting underserved needs**

As noted in the HAFC 5-year Plan and Annual Plan adopted April 30, 2011, the Allen Road Mid-Rise apartments are typically fully occupied. As of June 1, 2010, there were 115 extremely low-income families on the public housing waiting list and 119 families on the Section 8 tenant-based assistance waiting list. As such, the primary need for tenants and applicants on waiting lists who are predominantly elderly and disabled is the availability of affordable units.

The priority for the Housing Authority of Fulton County (HAFC) outlined in the agency's 5-year Plan is to maximize the number of affordable units available to the agency and increasing the number of affordable units overall.

HAFC plans to meet its 5-year goals by:

- (1) Leveraging affordable housing resources in the community through the creation of mixed - finance housing
- (2) Applying for additional Housing Choice Vouchers should they become available
- (3) Pursuing housing resources other than public housing or HCV tenant-based assistance.

For 2017, the City embarks on conducting the new Assessment of Fair Housing. Aided by public engagement, local data, and local knowledge, the City seeks to identify and address public-affordable

housing needs.

### **Actions planned to foster and maintain affordable housing**

According to the 2010 Decennial Census data, approximately 52.4% of the units in the City are renter-occupied. The market conditions do not indicate a need for acquisition and/or preservation of existing affordable housing units. The City's new Comprehensive Plan has set new priority actions, which include new housing policies and programs to ensure that affordable, workforce housing is encouraged.

### **Actions planned to reduce lead-based paint hazards**

The 2010 Census indicates that approximately 30% of the renter-occupied units within the City have the potential to contain lead-based paint. These units would mostly be located in the LMI income areas of the City. However, more detailed information would be required prior to developing a strategy for addressing lead-based paint. At the present time, the City is not planning to undertake any housing activities and will not disturb any housing units that contain lead-based paint. The City will coordinate with the Fulton County Health Department to reduce lead-based paint hazards for children. In addition, the City's Code Enforcement Division will be alerted for lead-based paint hazards.

### **Actions planned to reduce the number of poverty-level families**

The core premise of the anti-poverty strategy is that employment is the vehicle through which those who are impoverished can best achieve the goal of self-sufficiency. The most efficient method for reaching this goal is for the City to strive for an economic climate that leads to the availability of a wide range of possible jobs available for these individuals. In 2012, the City adopted an Economic Development Plan with a city-wide focus and a City Center Master Plan to guide the redevelopment of the City's core area. Both of these plans focus on priorities adopted by the City Council to attract, retain, and strengthen business activities throughout the City and across all employment sectors. In addition to these plans, in 2010 the state of Georgia announced that Sandy Springs had been chosen for the Opportunity Zone Job Tax Credit Program which will help encourage new businesses to locate in the City - or existing businesses to expand. The program is administered by the Georgia Department of Community Affairs and offers the highest tax advantages for companies and is the most user-friendly job tax credit in the State. It allows businesses to apply a tax credit of \$3,500 per net new job created against the company's State income tax liability.

An additional strategy would be to coordinate with the Fulton County Office of Workforce Development to determine if programs or partnerships with service agencies could help the City achieve a reasonable antipoverty strategy.

### **Actions planned to develop institutional structure**

For the period of the 2013-2017 Consolidated Plan, the City's strategy for addressing the special needs

populations is to ensure continued review and evaluation of permit applications for compliance with ADA requirements.

### **Actions planned to enhance coordination between public and private housing and social service agencies**

While the City has not adopted any specific strategies to address homelessness and the priority needs of homeless persons, the City has provided an annual \$100,000 grant from its general fund to the CAC since 2010. These grant funds have been used by the CAC to further its programs for homeless and low and moderate-income individuals. In addition to continuing its support of the CAC, the City's objectives for enhancing coordination will be as follows:

1. Coordinate with the Fulton County Office of Workforce Development to determine if programs or partnerships with service agencies could help the City achieve a reasonable antipoverty strategy

### **Discussion**

The actions outlined above will facilitate the City's ability to overcome obstacles in meeting the underserved needs of the identified populations.

## Program Specific Requirements

### AP-90 Program Specific Requirements – 91.220(I)(1,2,4)

#### Introduction

#### Community Development Block Grant Program (CDBG)

##### Reference 24 CFR 91.220(I)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	0
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
<b>Total Program Income:</b>	<b>0</b>

#### Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	100.00%

## Discussion

The City will use 100% of its 2017 CDBG allocation toward South Roswell Road Multiyear Sidewalk Project and does not plan on having any program income or urgent need activities. The City also anticipates pursuing the Section 108 loan for alternative financing in order to, more efficiently, complete Phase 3 of the South Roswell Road Multiyear Project.

**DRAFT AMENDMENT**  
**2013-2017 Consolidated Plan**  
**2013 Annual Action Plan**  
**Sandy Springs, GA**



**Submitted May 17, 2013**

**U.S. Department of Housing and Urban Development**  
**Atlanta Regional Office**  
**Five Points Plaza Building**  
**40 Marietta Street**  
**Atlanta, GA 30303**



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# Executive Summary

## ES-05 Executive Summary

### 1. Introduction

The Consolidated Plan is a 5-year plan which describes the City's community development priorities and multiyear goals based on an assessment of housing and community development needs, an analysis of housing and economic market conditions, and available resources.

The Consolidated Plan is carried out through action plans, which are adopted annually. Each Annual Action Plan provides a concise summary of the actions, activities, and the specific federal and non-federal resources that will be used each year to address the priority needs and specific goals identified by the Consolidated Plan.

### 2. Summary of the objectives and outcomes identified in the Plan Needs Assessment Overview

The Needs Assessment identifies Public Improvements and Infrastructure and Public Service as the priority needs for the City. The City has determined that completion of the Roswell Road Multiyear Sidewalk Project, begun under the previous Consolidated Plan, will be the initial project for the 2013-17 Consolidated. The CDBG Program for this project will fulfill the Suitable Living Environment objective and Availability/Accessibility outcome of the CPD Performance Measurement Framework. Any future Public Service projects will also be required to fulfill one of the three objectives [(1) Decent, Affordable Housing, (2) Suitable Living Environment, and (3) Economic Opportunities] and the three outcomes [(1) Availability/Accessibility, (2) Affordability, and (3) Sustainability].

#### **Section 108 Loan Guarantee Program – Consolidated Plan Amendment**

CDBG regulations 24 CFR Part 570.700 describe a process whereby Sandy Springs can leverage up to 5 times its most recent CDBG allocation from HUD to increase the impact of its CDBG funds and benefit to LMI residents.

It is the City's intent to apply for an advance on its future CDBG allocations permitted under the Section 108 Loan Program in order to, more efficiently, complete Phase 3 of the South Roswell Road Multiyear Project. Phase 3 will include right-of-way appraisals, and acquisition, installation of pedestrian lighting, handicapped ramps, and brick pavers from I-285 down to Long Island Drive which are identified LMI target areas.

The Section 108 Loan Guarantee Program funds represent the infusion of a considerable amount of funding that will have a direct benefit on the LMI residents of the City.

### 3. Evaluation of past performance

Under the Phase I of the Roswell Road Multiyear Sidewalk project, the City was able to construct 1.5 miles of sidewalks including street lights, ADA ramps, brick pavers, and landscaping from Dalrymple Road to Northridge Road. This portion of the project increased access and improved safety for Low- and Moderate-Income (LMI) residents accessing transit and other services in the corridor such as the North Fulton Service Center.

Based on the significant pedestrian improvements in the corridor, it is the City's desire to continue on with the project and complete Phase II which will afford the same access and safety to LMI residents between Northridge Road and the Chattahoochee River. The project will also include improvements along Hightower Trail to the Community Assistance Center, the City's largest nonprofit public service provider.

#### **4. Summary of citizen participation process and consultation process**

The City of Sandy Springs adopted its Citizen Participation Plan in 2006. The plan serves as the City's official policy for involving the community in the development of all planning documents related to the CDBG program, and the evaluation of the program's annual performance.

In conformance with the Citizen Participation Plan, the City held the required public hearing and meetings to solicit comments on community needs prior to creation of a draft 5-year Consolidated Plan. Those meetings were as follows:

1. Public Hearing on Tuesday, December 4, 2012 at 6:00 p.m. (Sandy Springs City Hall)
2. Open House on Wednesday, December 19, 2012 at 6:00 p.m. (Sandy Springs City Hall)
3. Needs Assessment Wednesday, January 23, 2013 at 6:00 p.m. (Sandy Springs City Hall)

In addition to receiving public comments and consulting with these agencies, the City of Sandy Springs maintains a webpage dedicated to the CDBG Program and the development of the Consolidated Plan in an effort to broaden public participation in the City's process. The City also has a dedicated email address ([cdbgprogram@sandyspringsga.gov](mailto:cdbgprogram@sandyspringsga.gov)) to allow questions or comments to be sent to the City on any aspect of the CDBG program to give the community easy access to CDBG Program information.

#### **5. Summary of public comments**

Over the course of the Citizen Participation process discussed above, the Community Development Department staff received comments from and/or consulted with the following agencies:

- Child Development Association

- The Drake House

- Families First
- The Solidarity School
- U-Hope CDC, Inc.

These agencies have indicated a desire for the City to provide funding for Public Service projects through its CDBG funding allocations. A summary of the public hearing minutes is provided in the Appendix.

### **Citizen Participation-Section 108 Loan Guarantee Program Amendment**

No comments have been received on the Section 108 amendment in response to advertising the amendment or during the public hearing held on June 16, 2009.

#### **6. Summary of comments or views not accepted and the reasons for not accepting them**

All comments and views were accepted by the City during the Citizen Participation process.

#### **7. Summary**

Based on the Needs Assessment and Market Analysis, the City determined that the most appropriate use of its CDBG allocation during the 2013-17 Consolidated Planning period is for Public Improvements and Infrastructure and Public Service projects. Due to the previous project undertaken with CDBG funds, the initial focus of the plan will be to complete the Roswell Road Multiyear Sidewalk Project as outlined in the 2013 Annual Action Plan. For 2017, the City seeks to pursue the Section 108 loan to obtain alternative financing to complete the Phase 3 of the South Roswell Multiyear Project in order to complete it more efficiently and in a single effort.

# IDIS OnLine Access Request

U.S. Department of Housing and Urban Development  
Office of Community Planning and Development

**Privacy Act Statement:** Public Law 97-255, Financial Integrity Act, 31 U.S.C. 3512, authorizes the Department of Housing and Urban Development (HUD) to collect all the information which will be used by HUD to protect disbursement data from fraudulent actions. The purpose of the data is to safeguard the Integrated Disbursement and Information System (IDIS) from unauthorized access. The data are used to ensure that individuals who no longer require access to IDIS have their access capability promptly deleted. This information will not be otherwise disclosed or released outside of HUD, except as permitted or required by law. Failure to provide the information requested on the form may delay the processing of your approval for access to IDIS.

**Public Reporting** burden for this information collection is estimated to average 30 minutes including time for collecting, reviewing, and reporting data. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

## GRANTEE & REQUESTOR INFORMATION

REQUEST TYPE	Role to be Performed by Headquarters	Role to be Performed by Field or Local IDIS Administrator
	New Request <input type="checkbox"/>	Drop from IDIS <input type="checkbox"/>
	Renew Lapsed ID <input type="checkbox"/>	Change Function or Program Area <input type="checkbox"/>
	Change Name <input type="checkbox"/>	
	Add Access for Another Grantee <input type="checkbox"/>	

Please create a five digit pin that will be used for password resets. [ ][ ][ ][ ][ ]

Requestor's Name (Last, First, MI): \_\_\_\_\_ Office E-mail Address: \_\_\_\_\_

Office Address: \_\_\_\_\_ Office Phone: \_\_\_\_\_ ext.: \_\_\_\_\_

Grantee Name in IDIS: \_\_\_\_\_ **GRANTEE TYPE**  
 City  County  State  Non-Profit  Sub Grantee\*

**Please Mark All Necessary Functions & Programs**

<b>Authorized Functions</b>	Set Up Activity <input type="checkbox"/>	Request Drawdown <input type="checkbox"/>
	Approve Drawdown <input type="checkbox"/>	Local IDIS Administrator <input type="checkbox"/>

**Program Areas** CDBG  HOME  ESG  HOPWA   
 HESG  HOPWA-C  Other \_\_\_\_\_  
If other, please specify name of program

\*Approval of State Sub Grantee Request – CPD State Coordinator or State Official name, signature and date:  
 Name: \_\_\_\_\_ Signature: \_\_\_\_\_ Date: \_\_\_\_\_

<b>Modules</b>	<b>Con Plan:</b>	Create/Edit/Submit <input type="checkbox"/>	Edit <input type="checkbox"/>	View <input type="checkbox"/>
	<b>Caper:</b>	Create/Edit/Submit <input type="checkbox"/>	Edit <input type="checkbox"/>	View <input type="checkbox"/>

### IDIS Online Rules of Behavior September 14, 2015

#### Introduction

This Rules of Behavior (RoB) procedure was developed as a guide to ensure that all users of IDIS Online are made aware of their security responsibilities before accessing IDIS Online. The RoB defines responsibilities and procedures for secure use of IDIS Online. By reading and acknowledging these rules, users accept the responsibility to protect IDIS Online and data. Users are accountable for their actions and the requirements to protect IDIS Online data and equipment from both malicious and accidental loss and damage. These rules clearly delineate the responsibilities of and expectations for all individuals with access to IDIS Online. Non-compliance with these rules will be enforced through sanctions commensurate with the level of infraction.

#### Responsibilities

All authorized users who have access to IDIS Online are required to read, acknowledge understanding, and sign the RoB before accessing IDIS Online and associated data. This acknowledgement must be completed annually thereafter.

By agreeing to and signing these rules, the user signifies:

1. Understanding that access is given only to IDIS Online to which the user requires access in the performance of their official duties and the user will not attempt to access systems they are not authorized to access.

2. Understanding of the IDIS Online Rules of Behavior (IDIS RoB) security requirements.
3. Acknowledgement that disciplinary action may be taken based on violation of the IDIS RoB.

The IDIS Online System Security Administrator (SSA) verifies that the users who require access to IDIS Online have read and accepted (via signature on the acceptance form) this IDIS RoB.

**Other Policies and Procedures**

This IDIS RoB is intended to enhance and further define the specific rules each user must follow while accessing IDIS Online. The rules are consistent with the policy and procedures described in the following directives:

Revision of OMB Circular No. A-130, Transmittal No. 3, Appendix III, "Security of Federal Automated Information Resources."	<a href="https://www.whitehouse.gov/omb/circulars_a130_a130pre">https://www.whitehouse.gov/omb/circulars_a130_a130pre</a>
Privacy Act of 1974, as amended, 5 U.S.C. § 552a	<a href="http://www.justice.gov/opcl/privacy-act-1974">http://www.justice.gov/opcl/privacy-act-1974</a>
18 USC 1030(a)4, "Accessing to Defraud and Obtain Value"	<a href="http://www.gpo.gov/fdsys/granule/USCODE-2010-title18/USCODE-2010-title18-partI-chap47-sec1030/content-detail.html">http://www.gpo.gov/fdsys/granule/USCODE-2010-title18/USCODE-2010-title18-partI-chap47-sec1030/content-detail.html</a>
NIST Special Publication 800-18 - Revision 1, Guide for Developing Security Plans for Information Technology Systems, February 2006	<a href="http://csrc.nist.gov/publications/nistpubs/800-18-Rev1/sp800-18-Rev1-final.pdf">http://csrc.nist.gov/publications/nistpubs/800-18-Rev1/sp800-18-Rev1-final.pdf</a>
HUD Information Technology Security Policy Handbook	<a href="http://portal.hud.gov/hudportal/HUD?src=/program_offices/administration/hudclips/handbooks/cio/2400.25">http://portal.hud.gov/hudportal/HUD?src=/program_offices/administration/hudclips/handbooks/cio/2400.25</a>

**Application Rules**

Because written guidance cannot cover every contingency, you are asked to go beyond the stated rules, using your best judgment and highest ethical standards to guide your actions. These rules are based on Federal laws and regulations and HUD policies. As such there are consequences for non-compliance. The following IDIS RoB is the minimum rules for users who are requesting an IDIS Online user account:

1. You are aware of the existence of and penalty for violating 18 USC 1030 and abide by:
  - a. The elements of 18 USC 1030(a)4, "Accessing to Defraud and Obtain Value" are:
    - i. Knowingly accessing a protected computer without or in excess of authorization;
    - ii. With intent to defraud;
    - iii. Access furthered the intended fraud; and
    - iv. Obtain anything of value
  - b. The penalty for violating this statute includes a fine and imprisonment of not more than ten years, or both.
2. You must adhere to HUD's policy requiring a separation of duties between the requestor and approver for financial transactions:
  - a. Effective December 14, 2001, the same person can no longer both request and approve a given draw down in IDIS Online.
  - b. While individual persons may have the power to both request and approve draws, this rule prevents an individual from approving a draw that he or she created. IDIS Online requires two people to be involved in every draw down of funds.
3. Currently, the IDIS Online Local Administrator initially defines what a person can do in IDIS Online, carrying out the wishes of each grantee's authorizing official — mayor, grant holder, CEO, CFO, etc. Some users have full rights, while others have limited rights of various kinds. You understand that you are given access only to IDIS Online to which you require access in the performance of your official duties and that you will not attempt to access systems that you are not authorized to access.
4. You are prohibited from misusing IDIS Online, i.e., exceeding your authority. Your level of access to IDIS Online is limited to ensure your access is not more than necessary to perform your legitimate tasks or assigned duties. If you believe you are being granted access that you should not have, you must immediately notify the IDIS Online SSA via email at [IdisUseridRequests@hud.gov](mailto:IdisUseridRequests@hud.gov).
5. You must immediately notify your Supervisor, CPD Field Office Administrator, and/or your Local Grantee Administrator if your access/privilege are no longer required, termination, promotion, and transferred.
6. You must maintain the confidentiality of your authentication credentials such as your password. Do not reveal your authentication credentials to anyone and do not record passwords on paper or in electronic form.
7. You must report all security incidents or suspected incidents (e.g., lost passwords, improper or suspicious acts) related to IDIS Online to the HUD Computer Incident Response Team at [CIRT@hud.gov](mailto:CIRT@hud.gov).
8. Your IDIS Online password expires every 90 days, so ensure you access IDIS at least once a month. Users who do not use IDIS within a 90 day period will find their accounts are de-activated.

9. You must follow proper logon/logoff procedures. You must manually logon to your session; do not store your password locally on your system or utilize any automated logon capabilities. You must promptly logoff when session access is no longer needed. If a logoff function is unavailable, you must close your browser. Never leave your computer unattended while logged into IDIS Online.
10. You must not establish any unauthorized interfaces between IDIS Online and other non-HUD systems.
11. Your access to IDIS Online constitutes your consent to the retrieval and disclosure of the information within the scope of your authorized access, subject to the Privacy Act, and applicable Federal laws.
12. You must safeguard IDIS Online resources against waste, loss, abuse, unauthorized use of disclosure, and misappropriation.
13. You must not process classified national security information on IDIS Online.
14. You must not browse, search or reveal IDIS Online data except in accordance with that which is required to perform your legitimate tasks or assigned duties. You must not retrieve data, or in any other way disclose data, for someone who does not have authority to access that information.
15. By your signature or electronic acceptance (such as by clicking an acceptance button on the screen), you must agree to these rules

**User Acknowledgement and Certification— I acknowledge and certify that:**

1. I understand the IDIS RoB and Federal Government policies as set forth above regarding security awareness and practices when accessing and utilizing IDIS Online.
2. I have read and understand the IDIS RoB governing my use of IDIS Online and agree to abide by them.
3. I understand my responsibilities and the penalties for NOT ADHERING to the IDIS RoB.
4. I understand that failure to comply will result in disciplinary action against me which may include, but are not limited to, a verbal or written warning, removal of system access, reassignment to other duties, demotion, suspension, reassignment, termination, and possible criminal and/or civil prosecution.

<b>Requestor Name:</b> _____	<b>Signature:</b> _____	<b>Date:</b> _____
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**GRANTEE APPROVING OFFICIAL**

Approving Official's Name:  
\_\_\_\_\_

Title:  
\_\_\_\_\_

Office Phone: \_\_\_\_\_ ext.: \_\_\_\_\_

Office Address: (Street, City, State, Zip)  
\_\_\_\_\_  
\_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

I authorize the person above to have access to IDIS functions checked.

**NOTARY**

**The Approving Official's signature must be notarized to verify the identity of the individual who signed this document using the appropriate notary certificate of the state, territory or insular area. Once completed, attach the notarized certificate to this form and send to your local HUD CPD Field Office.**

**HUD FIELD OFFICES**

Field Office Approval (CPD Director or Designee) Name: _____	Signature: _____	Date: _____
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