

Housing Authority of Baltimore City
A Moving To Work Agency

The MTW Annual Plan for F Y 2018

30-Day Notice & Comment Periods:

February 28th, 2017 through March 30th, 2017

October 13, 2017 through November 12, 2017

February 26, 2018 through March 28, 2018

Public Meeting:

March 22nd, 2017 and

October 31st, 2017

March 22nd, 2018

201 N. Aisquith Street

Baltimore, MD. 21202

6:00pm - 8:00 pm

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Table of Contents

I. INTRODUCTION AND OVERVIEW	5
<i>A. Short-Term Goals and Objectives</i>	<i>6</i>
<i>B. Long-Term Goals and Objectives</i>	<i>13</i>
II. GENERAL HOUSING AUTHORITY OPERATING INFORMATION	15
<i>A. Public Housing Inventory.....</i>	<i>15</i>
<i>B. Section 8/Housing Choice Voucher Inventory</i>	<i>17</i>
<i>C. Waiting List Information</i>	<i>22</i>
<i>D. Housing Stock Information.....</i>	<i>25</i>
<i>E. Neighborhood Development Activities and Expenditures.....</i>	<i>31</i>
<i>F. Leasing Information – Planned.....</i>	<i>35</i>
III. PROPOSED MTW ACTIVITIES	38
IV. ONGOING MTW ACTIVITIES.....	40
<i>A. Implemented Activities</i>	<i>40</i>
<i>B. Not Yet Implemented</i>	<i>48</i>
<i>C. Activities on Hold.....</i>	<i>49</i>
<i>D. Closed Out Activities.....</i>	<i>50</i>
V. MTW SOURCES AND USES OF FUNDING.....	55
<i>A. Planned Sources and Uses of MTW Funds</i>	<i>55</i>
<i>B. Single Fund Flexibility.....</i>	<i>60</i>
<i>C. The Rental Assistance Demonstration Program</i>	<i>62</i>
VI. ADMINISTRATIVE	65
Appendix A: Board Resolution and Certification of Compliance	
Appendix B: Asset Management Table	
Appendix C: FY 2016 Proposed Cost Allocation Methodology & Local Asset Management Plan	
Appendix D: Certifications: HUD-50071 – Certification of Payments to Influence Federal Transactions	
<ul style="list-style-type: none">• SF-424 – Application for Federal Assistance• HUD-52723 – Operating Fund Calculation of Operating Subsidy• SF-LLL – Disclosure of Lobbying Activities	
Appendix E: Summary of Proposed Changes to the Thompson Special Admin Plan	
Appendix F: Summary of Proposed Changes to the HCV Administrative Plan	
Appendix G: Matrix of ACOP, Lease and Grievance Changes	
Appendix H: The Annual Statement/Performance and Evaluation Report	
Appendix I: Private Management Portfolio	
Appendix J: General Housing Information and MTW Sources & Uses	
Appendix K: Office of Resident Services	
Appendix L: Information Technology	
Appendix M: Non-MTW Information	
Appendix N: Amendments to the Annual Plan	
Appendix O: Review of Comments Received and Subsequent Changes	

Appendix P: The Public Process
Appendix Q: Gilmor Units for Demolition
Appendix R: LTA Criteria
Appendix S: Phase II RAD Information

I. Introduction and Overview

Pursuant to Section 239 of title II, Division L of the 2016 Consolidated Appropriations Act (P.L. 114-113) the Housing Authority of Baltimore City (“HABC”) Moving to Work (“MTW”) Agreement with the US Department of Housing and Urban Development (“HUD”) was modified and extended through June 30, 2028. HABC has been a full participant in the MTW program since 2005 and entered into its first ten-year MTW Agreement effective December 24, 2008.

MTW is a national demonstration program authorized by Congress which gives HABC the flexibility to waive certain statutes and HUD regulations pertaining to the Public Housing and Housing Choice Voucher (“HCV”) programs. The MTW statutory objectives include the following:

- 1) Reduce cost and achieve greater cost effectiveness in Federal expenditures;
- 2) Give incentives to families with children whose heads of household are either working, seeking work, or are participating in job training, educational or other programs that assist in obtaining employment and becoming economically self-sufficient; and,
- 3) Increase housing choices for low-income families.

The MTW activities undertaken and/or planned by HABC are all designed to promote one or more of the statutory objectives.

This document is the MTW Annual Plan for Fiscal Year 2018, which is the period from July 1, 2017 to June 30, 2018. HABC is required to prepare this Annual Plan in conformance with the specifications of HUD Form 50900 “Elements for the Annual MTW Plan and Annual MTW Report”. For purposes of this document and the required submission to HUD, an “MTW activity” is defined as any activity that requires MTW flexibility to waive statutory or regulatory requirements.

In order to provide the public and HUD with a more detailed view of HABC’s overall plans and strategies, this Annual Plan includes discussions of both MTW activities and other activities which do not specifically require MTW authority to implement. It also references and details proposed changes to both the HCV Administrative Plan and the Public Housing Admissions & Continued Occupancy Policies (“ACOP”).

Overview of FY 2018 Objectives and Activities

As of the Annual Plan’s submission to HUD,(April 14, 2017), HUD has not announced final calendar year 2018 funding for critical programs administered by HABC including the Public Housing Operating Fund and Housing Choice Voucher Program. Thus, the programs and initiatives described herein may need to be modified based on final funding decisions.

A. Short-Term Goals and Objectives

HABC's goals for the current and future years of the MTW Demonstration include supporting neighborhood revitalization, reducing administrative costs and promoting resident economic self-sufficiency. During Fiscal Year 2018, HABC will continue to work towards these overarching goals through a broad range of housing, capital improvement, resident services and development activities as described in this Plan. Major non-MTW initiatives for the year ahead include:

- Public Housing Occupancy – HABC projects that it will achieve a 97% adjusted occupancy rate in its public housing developments.
- Leased Housing Lease Ups – By the end of FY2018, HABC projects it will have a total of 17,455 units under lease including Thompson and all other programs.
- Project Based Vouchers – An estimated 342 additional housing units will be leased under HABC's PBV program.
- HABC received a letter from HUD dated November 19, 2013 approving the inclusion of project-based vouchers and other affordable housing development options for HABC's development methods. We have obligated the Replacement Housing Factor Funds for grant years 2010 through 2014 for approximately \$17.7 million. Our projects include the new construction of scattered site handicap accessible units, the redevelopment of O'Donnell Heights; Phase I-B, Planning Fees for Perkins Homes and the Rental Assistance Demonstration Program (RAD) and RAD related construction work at McCulloh Homes. HABC anticipates spending approximately \$2.6 million in FY2018-on-these-projects.

Additionally, HABC has received authority to accumulate the 2015, 2016 and 2017 Replacement Housing Factor (RHF) Funds for approximately \$4.9 million. These funds will be used in accordance with redevelopment methods that comply with the new Capital Fund rules involving the development of new affordable housing and the RAD Program. Projects currently being considered include replacement housing for Hollander Ridge and gap financing for the RAD conversions of J. Van Story Branch and Somerset Court Extension.

- Portfolio Planning – HABC will continue refining its portfolio assessment including assessing capital needs, developing a capital spending plan and strategy, (see page 25) and identifying a framework for future development activity. As a result of our findings in HABC's portfolio wide asset review, we have updated the Asset Management table (Appendix B) to identify sites where redevelopment, conversion, homeownership, management improvements and other activities may take place in the future; however, it is subject to periodic change based on priorities and available resources. Both traditional and non-traditional sources of funding will be assessed including identifying ways in which MTW flexibility can be used to leverage and support reinvestment in HABC developments.
- In July 2013, HUD revised requirements for RAD, which made the program more beneficial for public housing authorities. RAD provides for the conversion of public housing units by replacing public housing subsidy with Section 8 or Project Based Rental

Assistance (“PBRA”) subsidy. The HABC RAD conversions have been combined with other resources such as Low Income Housing Tax Credits (“LIHTC”) to raise needed capital for the renovation of the converted public housing units. As such, during a 4 year period, the RAD program will bring over \$320 million of new investment, thereby preserving thousands of affordable housing units. The majority of the renovation work under RAD will involve HABC’s mixed population buildings throughout the city that serve the elderly and the non-elderly persons with disabilities (“NEDs”).

On December 24, 2013, HUD approved HABC's request for a portfolio award under RAD to cover 22 public housing developments (the "**RAD Projects**"), allowing for rehabilitation of the developments and the continued operation as affordable housing. HABC plans to convert 4,134 mixed-population, family and elderly preference units to RAD. Fifty-nine (59) mixed-population units will remain in HABC’s inventory.

In order to maximize the capital for rehabilitation of the RAD Projects, tax exempt bonds and LIHTC funds will be a portion of the construction financing. To utilize LIHTC, each of the RAD Projects must be conveyed to owner entities comprised of the selected developers and subsidiaries of HABC as the general partners and the LIHTC investor limited partners.

On May 28, 2014, HABC created the Baltimore Affordable Housing Development, (“BAHD”) as a subsidiary to facilitate development activities, including the development projects approved by HUD for RAD and other affordable housing development activities in Baltimore City. BAHD applied for and was awarded tax-exempt status under 501(c)(3) of the Internal Revenue Code.

As part of the transactions, HABC intends for BAHD to be the entity that conveys to the above-described owner entities a leasehold interest in the land through a long-term ground lease and a fee simple interest in the improvements on the land. In addition to the long term ground lease with BAHD, the RAD Projects will be subject to a recorded RAD Use Agreement which will ensure the long term affordability of the RAD Projects.

In addition, HABC will be party to certain agreements governing the administration of the centralized waiting list to ensure that the RAD Projects are operated in accordance with the requirements of RAD and HABC.

There will be 6,550 public housing units remaining after the RAD conversions are completed. Of the 6,550 remaining public housing units:

- 343 UFAS compliant units (270 in the conventional family developments, 31 scattered site units and 42 new construction units) have been certified;
- An additional 23 near-UFAS compliant units (created pursuant to the Bailey Consent Decree) have been certified;
- Pursuant to the Bailey Consent Decree, HABC has created 53 long term affordable (“LTA”) new construction UFAS units; and
- An additional 43 new construction UFAS units are either under construction or in the pipeline (2 of these 43 units will be public housing units and the remaining 41 units will be LTA units).

Pursuant to the Bailey Consent Decree, the LTA units “are the equivalent of public housing ...if the households residing in them receive any and all rights, privileges, and benefits that are provided to HABC’s public housing residents or applicants.” The parties negotiated the LTA Criteria for the LTA units to provide households living in the LTA units the same rights, privileges and benefits that are equivalent to those available to public housing residents. The LTA units must be occupied from HABC’s reasonable accommodation transfer waiting list, which consists of HABC residents who have been approved for a reasonable accommodation transfer, and by applicants on HABC’s applicant waiting list.

Thus, HABC will have a total of 439 UFAS units and 23 near-UFAS units for a total of 462 units, which is 7% of the remaining public housing units.

The following Phase II properties are expected to convert under RAD during FY 2018:

1. Monument East
2. Somerset Court Extension
3. Rosemont Tower
4. J. Van Story Branch (West Twenty)
5. Hillside
6. Heritage Crossing
7. Thompson 58
8. Townes at the Terraces
9. Arbor Oaks

To maximize the RAD Program, HABC will sell the properties to qualified affordable housing developers. By statute, the new owners are required to maintain the units for the same population and all current residents will have the choice to return to the same property upon completion of significant renovations, or remain in HABC’s conventional public housing program. All future residents will come from the HABC reasonable accommodation transfer waiting list and the HABC public housing waiting list.

- Resident Services – HABC plans to serve its public housing residents through a wide array of self-sufficiency, personal development and supportive service program offerings including a Targeted Unemployment Initiative which assists unemployed residents to obtain jobs through a comprehensive program of supportive services.
- Capital Planning – HABC will continue its program of capital improvements and development activities. Major highlights include window and roof replacements; domestic hot water replacements and upgrades, sump pump repairs and installations; feasibility studies involving the upgrades to electrical distribution systems and replacement, heating upgrades, repair and replacement of playgrounds and athletic courts, vacancy renovations, painting, and kitchen and bathroom upgrades at HABC family and scattered sites. HABC will also implement an Environmental Performance Contract (“EPC”) Program designed to provide energy savings throughout HABC’s communities.

- Development activities also involve the acquisition/or development of 110 affordable housing units and the development of O'Donnell Heights Phase 1-B where the new construction of 68 affordable rental units is underway. HABC is providing 34 project-based vouchers for returning residents, non-elderly persons with disabilities and households needing the features of UFAS compliant units. The remaining 34 units will be affordable to households earning less than 60% of the area median. The project is now under construction. Pursuant to HABC's MTW Agreement, as amended, HABC's RHF Funds will also provide a source of funding to the project in the form of a loan to the owner entity to support the developments costs, including a portion of which will be used as collateral for the tax-exempt bond debt.

HABC projects MTW and Non-MTW capital expenditures of approximately \$48.8 million in the coming year. HABC has combined all current and prior year Capital funds, including RHF funds, into the MTW Block Grant.

Major MTW initiatives for the year ahead include:

- **Landlord Communications and Payment Methods** - Currently, HABC communicates with landlords in a variety of formats, including email, fax, US mail and phone. HAP payments are delivered via direct deposit or sent in a check via US mail. The time and cost to prepare print, and mail landlord/owner notices, payments, inspection results and other communications is administratively and financially burdensome. In FY2018, HABC will require that all HCV landlord/owners receive all communications from HABC electronically. Further, HABC will require landlord/owners to receive HAP payments via direct deposit only. Approximately 41 of the 3,300 landlords still receive paper checks.

In the event that a landlord/owner opts out of the electronic delivery/direct deposit requirement, using its MTW authority, HABC will charge the owner an administrative fee. The administrative fee structure will be two tiered, one fee for paper delivery of letters, notices, reports, etc. and another fee for paper checks. Implementation of this communications initiative is in accordance with the Paperwork Reduction Act of 1995. HABC will amend the HAP contract to reflect this requirement. HABC will apply this policy to all paper statements, letters, inspection reports, and Housing Assistance payments.

In FY 2018, HABC will continue to work closely with the Mayor's Office and other stakeholders to implement the Journey Home, Baltimore's Ten Year Plan to End Homelessness. HABC will continue to play a major role in the planning and implementation of this comprehensive, multi-disciplinary long-term initiative. Though most of the initiatives implemented do not require HABC to use its MTW Authority, virtually all of HABC's program activities help to support the goals of preventing and reducing homelessness in the City by providing quality, affordable housing to extremely low income families who would be at risk of homelessness without HABC's resources. HABC's commitment to the Mayor's initiative includes the following targeted initiatives:

- **Housing First Homeless Initiative** – This initiative does not require MTW Authority as HABC provides up to 850 Housing Choice Vouchers to eligible chronically homeless households referred by the Mayor's Office of Human Services (MOHS) Homeless Services

Program. Participants use their vouchers to find affordable permanent housing, while receiving supportive services from MOHS and other agencies. Two-hundred (200) of these vouchers have been set-aside for a rolling RFP for project-based units dedicated to the homeless population.

- Re-Entry Program – This program links permanent housing with supportive services to assist up to 250 homeless individuals and families with an ex-offender household member. Referrals are made to HABC by the Mayor’s Office of Human Services (MOHS) Re-Entry Program Coordinator. MTW Authority is not required for this initiative.
- Eviction Prevention – In Failure to Pay (“FTP”) court cases HABC has implemented an eviction prevention program prior to the family’s right to redeem the property is foreclosed upon. This program assists existing HABC residents with meeting their lease responsibilities and avoiding eviction action. Families are referred to Guidewell Financial Solutions, an agency that provides budgeting, credit repair, homeownership counseling, workshops and one-on-one counseling for public housing residents.

In addition, HABC selected Global Express a rent payment processing service that offers residents several options to pay their rent without having to purchase a money order. Tenants are able to go to several participating local vendor agents that are in the Global payment network. The agent network is the cornerstone that allows in-person payments to be made efficiently and timely. Residents may pay in cash, whereupon a receipt is provided and their rent credited as of the date paid. Global also offers Mobile Payments: the ability to pay anywhere and at any time including online.

This initiative continues to have a significant impact in preventing homelessness by reducing the number of HABC families evicted for lease violations or non-payment. As State law provides for the Right to Foreclose Redemption of HABC property, no MTW Authority is needed.

- Memorandum of Understanding (“MOU”) – In Breach of Lease (“BOL”) court actions HABC may enter into an MOU with the family found to be in non-compliance with the HABC Dwelling Lease. The MOU will set forth the conditions under which the family will cure the non-compliance and remain in the unit. No MTW Authority is required for this activity.

HABC was a party to two (2) consent decrees as described below. In order to meet its obligations as stipulated under each decree (one of which is actually a Settlement Agreement), HABC will undertake the following initiatives:

The Thompson Settlement Agreement

In 1995 a class action entitled *Thompson v. HUD*, No. MJG 95-309, was filed in U.S. District Court for the District of Maryland against the HABC, the City of Baltimore and HUD. The plaintiffs alleged that African-American residents of and applicants for public housing and Section 8 vouchers had been discriminated against based upon their race. Certain parts of the case were settled by the parties through a Partial Consent Decree (the “Thompson PCD”) approved by the District Court in

June 1996.

In November 2012, the District Court approved a final Settlement Agreement. The Thompson Settlement Agreement makes available up to 2,600 additional Housing Choice Vouchers from 2012 through 2018 (“Thompson Remedial Vouchers”), in addition to the 1,788 Housing Choice Vouchers already utilized under the Thompson PCD (“Thompson PCD-Leased Vouchers”). The Settlement Agreement also provides for the continuation of the *Thompson* Homeownership Voucher Program. The Baltimore Regional Housing Program (“BRHP”) administers the Thompson Remedial and Partial Consent Decree Vouchers. As such, the use of MTW Authority is often used to promote the three (3) statutory objectives.

All Thompson Remedial, and PCD-Leased, and Homeownership Vouchers must be used in Communities of Opportunity throughout the Baltimore metropolitan housing market as identified in the *Thompson* Settlement Agreement.

Hollander Ridge HOPE VI Project – The Thompson Settlement Agreement also provides that HABC will acquire and rehabilitate approximately 100 units in scattered sites locations in Baltimore City identified in the Thompson Settlement Agreement. Once acquired, they will be public housing rental units until such time as HUD approves the conversion of the Hollander Ridge units under RAD. Upon HUD’s approval of HABC’s FY 2017 Annual Plan as amended, HABC will exercise its MTW authority to certify and acquire the units without prior HUD approval.

Approximately \$18.85 million of HOPE VI funds that were originally designated for the redevelopment of the Hollander Ridge site are to be used to acquire and rehabilitate properties that will be replacement housing for both former Hollander Ridge residents and former or current O’Donnell Heights residents.

Pursuant to the Thompson Settlement Agreement, HABC will also make available the equivalent of \$7,140,000 (“Replacement Funds”). The Replacement Funds may be used in conjunction with FY 1996 HOPE VI Funds originally awarded to HABC for Hollander Ridge (“HOPE VI Funds”) to develop one or more scattered site projects. The Replacement Funds may be from any available source including, but not limited to, low income housing tax credits, the State Partnership Rental Housing Program, other State housing funds, low income housing bond funds, private debt or equity, public housing funds or MTW funds. However, the Replacement Funds may not be taken from the HOPE VI Funds.

Pursuant to Section 504 of the Rehabilitation Act of 1983 and HUD’s implementing regulations, at least five-percent (5%) of the units acquired under the Hollander Ridge Revitalization Plan will meet federal accessibility requirements for wheelchair users and HABC will require the developer to make 2% of the Hollander Ridge units hearing/vision compliant. Once the units have been acquired and an assessment completed, HABC will determine which units will be wheelchair accessible.

The Thompson Settlement Agreement supersedes the Thompson PCD, which included a provision that prohibited HABC from using public housing capital and operating funds to create public housing units in impacted areas in Baltimore City, as defined in the Thompson PCD. The Thompson Settlement Agreement removed this prohibition and, therefore, HABC is no longer prohibited from creating public housing units in these areas.

Required information on the programs under Thompson, ongoing and newly proposed MTW activities is incorporated into the remaining chapters of the Annual Plan.

The Bailey Consent Decree as amended by the Bailey Supplemental Decree (the “Bailey Decree, as amended”)

The plaintiffs in the *Bailey* case are persons with disabilities who are current or former residents of or applicants for HABC’s housing programs. To date, 741 of the required 756 UFAS units required by the Bailey Decree, as amended have been created and certified. These 741 units include 35 UFAS compliant homes for persons with mobility impairments that HABC had newly constructed and which are now in HABC’s scattered sites inventory. These 35 units are located throughout various neighborhoods within Baltimore City.

An additional 15 UFAS units must be created. Two of these 15 UFAS unit will be newly constructed scattered sites units. The remaining 13 UFAS units will be created through Baltimore City LIHTC projects and are under construction or in the pipeline. These 13 units will be those UFAS units that exceed 5% UFAS unit requirement for each LIHTC project.

HABC must also create an additional four three-bedroom units compliant with [the Uniform Federal Accessibility Standards](#) due to [HABC’s plan to partially demolish Gilmore Homes](#). In FY 2018 HABC will submit a disposition application to HUD to demolish 132 of the 548 units in Gilmore Homes. Actual demolition will occur in FY 2019. HABC is doing preliminary planning and through this process will determine where the additional 4 three-bedroom UFAS units will be located. HABC may use Capital funds in order to create the remaining four UFAS units.

As of March 9, 2017, 462 of the 500 project based units for Non-elderly Persons with Disabilities (“NEDs”) had been created and occupied by NEDs pursuant to the Bailey Decree as amended. The remaining 38 units are being constructed or are in the pipeline.

As of March 9, 2017, 73 of the 100 long term affordable NEDs units had been created and occupied by NEDs pursuant to the Bailey Decree as amended. The remaining 27 units will be created in the Hollander Ridge project, O’Donnell Heights 1B redevelopment project and Somerset Ext. RAD project.

Other short-term initiatives include the development of approximately seventeen units that, pursuant to the Bailey Consent Decree, will meet the Uniform Federal Accessibility Standards (“UFAS”) and the 2010 Americans with Disabilities Act (“ADA”) Standards for Accessible Design. Finally, 10 NED units will be created through the acquisition and rehabilitation of units in neighborhoods identified in the Bailey Supplemental Decree.

Information on HABC’s obligations under Bailey is incorporated into the remaining chapters of the Annual Plan.

B. Long-Term Goals and Objectives

In its initial request for MTW designation, HABC expressed the intention to implement a number of initiatives in both the HCV and public housing programs to support neighborhood revitalization, reduce administrative costs and promote resident economic self-sufficiency.

HABC is committed to creating new affordable housing opportunities for City residents at a wide range of incomes. Within its financial constraints, HABC plans to replace lost public housing units through the production of new homes for existing public housing residents and others with incomes that would qualify for public housing. In its redevelopment efforts, HABC will strive to create vibrant, mixed-income neighborhoods that will benefit both local residents and the wider community.

By making funds available to the public housing program utilizing MTW authority and an aggressive strategy for vacancy renovations/modernizations, HABC has been able to preserve approximately 800 public housing units between June 2006 and December 2016. In addition, as HABC nears completion of major renovation efforts to bring long-term vacant and uninhabitable units back on line, resources have been shifted back to the Housing Choice Voucher program which has resulted in serving 4,078 more households during the same period (excludes Substantial Rehab, New Construction, VASH and Thompson PCD and Remedial Vouchers).

Commencing in late 2010, HABC began to conduct a portfolio wide asset review. The results of this process, which is continuing into FY 2018, will provide a roadmap and framework for future investments and development activities. As part of this process, HABC is exploring ways in which MTW flexibility can help to support the agency's ability to leverage both traditional and non-traditional sources of funding.

Other existing long-term MTW initiatives include:

- Reducing the frequency of recertifications as a way to lower administrative costs, promote household savings, and minimize the burden imposed by this process on resident households. As noted in the Plan, HABC has implemented this initiative for Housing Choice Voucher participants and Public Housing residents. Over the term of the MTW Agreement, HABC will also implement other MTW initiatives designed to simplify program administration and reduce costs;
- The continuation of Project Based leasing programs to support City-sponsored targeted neighborhood revitalization. HABC has implemented a Project Based Voucher program that incorporates MTW flexibility and expands housing choice for program participants, as described herein.
- Pursuant to MTW authority, HABC modified its LTA Program to promote the long term affordability of units. Under this initiative, HABC entered into LTA Project Based Voucher contracts with developers/owners for some or all units to be developed on distressed former public housing sites, in rehabilitated or existing units in tax credit developments and through other development methods. LTA contracts are for a minimum forty (40) year term. The LTA units shall be managed and operated primarily in accordance with the HUD regulations

governing public housing units (*e.g.*, 24 CFR Parts 5, 960, 966, and the like) (the “Public Housing Regulations”), even though the LTA units will be subsidized with project based voucher funds.

II. General Housing Authority Operating Information

This section of the Annual Plan provides required information on HABC's current inventory, projected leasing activities and waiting lists for both the Public Housing and HCV programs. It includes details on planned changes to the housing stock as a result of new development, and demolition and disposition efforts. Additional data regarding the general operation of HABC's programs can be found in Appendix J. Planned significant capital expenditures are also summarized in this section.

A. Public Housing Inventory

Current Leasing - All HABC public housing units are included in the MTW Block Grant. As of December 31, 2016, 9,251 units are under an Annual Contributions Contract ("ACC") with the HUD, 7,999^[1] of which are available for occupancy. As a total of 7,503 households currently reside in public housing – HABC's adjusted occupancy rate is 94%.^[2] Because of the MTW Agreement requirement to submit the Annual Plan 75 days prior to the end of the fiscal year, the numbers provided as of December 31, 2016 will assist HABC in determining its anticipated inventory at the beginning of the year. In addition, HABC has 150 vacant units under contract that in most cases need capital related work to re-occupy and which will be completed during the 2nd quarter of FY 2018. HABC has restructured its labor force to create efficiencies related to unit preparation.

Projected leasing – HABC's projected adjusted occupancy rate for MTW public housing inventory and leasing as of June 30, 2018 will be 97%. The total number of units under an ACC with HUD will be 7,710 as of June 30, 2017 and 6,550 as of June 30, 2018, 6,325 of which will be available for occupancy. The total number of MTW public housing units to be leased as of June 30, 2018 is 6,135³ (the decrease in leased units is due to the RAD conversion of 1,218 public housing units in FY 2018).

Demolition/Disposition of Public Housing Units

Gilmor Homes - Over the years, HABC has made many physical improvements at Gilmor Homes; however, the age of the buildings and underground systems mean major work is still required at the site. The six walk-up buildings located at Bruce Court, Spray Court and Vincent Court present particular challenges at Gilmor due to the physical condition of the properties and the enclosed exterior stairways and hallways which present concerns for the safety of residents.

For these reasons, HABC intends to submit an application to HUD for the demolition of the six walk-up buildings (132 units) at Gilmor Homes. The removal of these buildings will open up the

^[1] Available for occupancy figures exclude units that are vacant and exempt consistent with 24 CFR 902.22. These exempt units include units: a) undergoing renovation and/or vacated due to consent decree mandated alterations; b) undergoing modernization; c) approved for deprogramming (disposition or demolition); d) approved for non-dwelling purposes; e) lost due to reconfiguration

^[2] Adjusted occupancy rate reflects the percentage of units that are available for occupancy that are actually occupied.

^[3] HABC continues to reconcile the number of ACC units in its inventory with those listed in PIC. The projected number of units to be leased as of June 30, 2017 and June 30, 2018 are based on the number of ACC units in PIC as of December 31, 2016 which was adjusted for lost units under RAD and vacant and exempt units under 24 CFR 901.5. HABC anticipates the reconciliation of ACC units will be complete in FY2018.

site and make it difficult to conceal illegal activity. Planning for this change will mean relocating residents, re-routing utilities, and deciding how the newly created open space will be used. A list of the affected units is attached hereto as Appendix Q.

Somerset Homes - HABC also intends to submit an application for the disposition of 8.64 acres of vacant land at 500 N. Central Avenue. This is the location of the former public housing development known as Somerset Homes which was demolished in 2009. HABC and the City of Baltimore expect to integrate the Oldtown and Somerset Master Plans with the Perkins Transformation Plan to create a single seamless plan; the Perkins-Somerset-Oldtown Transformation Plan.

During Fiscal Year 2018, HABC will continue its asset review of the scattered sites inventory. The results of this process will provide a roadmap and framework for future demolition and/or disposition of obsolete units. HABC anticipates that investments and development activities will result in the demolition and/or disposition of an additional 442 scattered sites units in FY2018.

HABC’s participation in the RAD program will result in the conversion of 4,134 Public Housing units to PBRA. The charts below provide information on anticipated changes to the current inventory in Fiscal Year 2018. The matrix entitled “Planned New Public Housing Units to be Added During the Fiscal Year,” identifies 100 public housing (ACC) units projected to be added to the public housing inventory in FY 2018, which HABC anticipates will be converted to PRBR units under RAD.

HABC projects that a total of 1,218 public housing units will be converted under RAD and 442 non-viable, obsolete units will undergo disposition and/or demolition from the public housing inventory during FY 2018.

Planned New Public Housing Units to be Added During the Fiscal Year

AMP Name and Number	Bedroom Size							Total Units	Population Type*	# of UFAS Units	
	0	1	2	3	4	5	6 +			Fully Accessible	Adaptable
MD002/TBD Hollander Ridge Replacement Units	0	20	30	40	10	0	0	100	General	5	0

Total Public Housing Units to be Added

Other Population Type:

All of the ACC public housing units are to be acquired pursuant to the Thompson Settlement Agreement. To date, HABC has not yet requested a project number for these units.

Planned Public Housing Units to be Removed During the Fiscal Year

PIC Dev. # / AMP and PIC Dev. Name	Number of Units to be Removed	Explanation for Removal
------------------------------------	-------------------------------	-------------------------

MD002/0200 Scattered Sites -	50	Obsolete and non-viable scattered sites units
MD002/0201 Scattered Sites -	134	Obsolete and non-viable scattered sites units
MD002/0202 Scattered Sites -	93	Obsolete and non-viable scattered sites units
MD002/0203 Scattered Sites -	165	Obsolete and non-viable scattered sites units
MD002/009 O'Donnell Heights	-	These six (6) lots will be sold to a developer to build for-sale housing. Plans to dispose of these lots at O'Donnell Heights were reported in the FY2017 Annual Plan; however, HABC will submit a disposition application to HUD in FY2018.
MD002/006 Gilmor Homes	132	Obsolete and non-viable public housing units
MD002/0010 Somerset Homes	--	8.64 acres of vacant land
MD002/0042 – Somerset Extension	60	RAD Conversion
MD002/0043 - Monument East	170	RAD Conversion
MD002/0070 - Rosemont	203	RAD Conversion
MD002/0041 – J. Van Story	357	RAD Conversion
MD002/0111 - Heritage	75	RAD Conversion
MD002/0105 Hillside Park	30	RAD Conversion
MD002/0101 – Arbor Oaks	62	RAD Conversion
MD002/0106 – Townes at the Terrace	203	RAD Conversion
MD002/ Homes for Arundel	58	RAD Conversion
Total Number of Units to be Removed	1,792	

B. Section 8/Housing Choice Voucher Inventory

As of December 31, 2016, HABC's existing Section 8 Housing Choice Voucher leased housing inventory includes 16,729 MTW units; 13,305 regular program units; 3,424 Thompson units and 1,273 non-MTW units. By the end of the FY2018, these figures are projected to reach 17,474; 13,057 total regular program units; 3,104 Thompson units and 1,313 non-MTW units respectively. Table 1 shows actual leasing levels as of December 31, 2016 and projected leasing levels as of June 30, 2018. For MTW vouchers, from December 2015 to December 2016, including Thompson voucher activity, there was a net increase of 697 HCV leased households (HABC leased 365 more units under the regular program and leased 332 more units under Thompson).

Under its ACC, HABC has been able to provide over 13,000 households with assistance. As of December 2016, HABC has contract authority under its ACC to issue 18,760 MTW vouchers (including VASH / excluding Thompson); however, available HUD funding does not support this level of leasing for MTW vouchers. It is important to note that neither HABC nor any other HCV administering agency is funded based on 100% of the ACC funding levels. The FY2005 Consolidated Appropriations Act changed the method and formula for allocation of HAP funds.

The number of ACC authorized vouchers reflects the maximum number of families which may be assisted if adequate funds are provided by HUD.

**Table 1:
Housing Choice Voucher Program Inventory and FY 2017 Projected Leasing**

	Actual Leased as of 12/31/16	Projected Leased as of 6/30/17
MTW Tenant Based Vouchers (Non Consent Decree)	10,780	10,307
MTW Project Based Vouchers (Non Consent Decree)	1,263	1,450
MTW Tenant Based Vouchers - Bailey	824	*850
MTW Project Based Vouchers – Bailey	438	570
<i>Sub-Total</i>	<i>13,305</i>	<i>13,177</i>
MTW PCD Vouchers – Thompson	1,750	1,762
MTW Remedial Vouchers – Thompson	1,788	2,340
MTW Homeownership Vouchers - Thompson	40	40
<i>Sub-Total</i>	<i>3,552</i>	<i>4,142</i>
TOTAL MTW VOUCHERS	16,857	17,319
Non-MTW Section 8 Moderate Rehab	273	270
Non-MTW Section 8 New Construction/Substantial Rehab	596	596
Non-MTW VASH Vouchers	404	447
<i>Sub-Total</i>	<i>1,273</i>	<i>1,313</i>
TOTAL ALL	18,130	18,632

*The total number of Bailey vouchers for NED households receiving assistance under the tenant-based program as of December 31, 2016 is 824. HABC is obligated to provide assistance in the equivalent of 850 NED vouchers, which is 102,000 unit months leased by NED participants, under the Bailey Consent Decree. Due to a reduction in HCV funding by HUD, HABC has stopped issuing vouchers to applicants on the HCV Program waiting list. Therefore, HABC is currently unable to maintain 850 tenant based vouchers leased to NEDs. However, HABC is fully committed to compliance with this Bailey Consent Decree requirement and will resume issuing vouchers to NEDs when funding permits to achieve the 102,000 unit months leased by NED participants.

HABC has also applied for and received special purpose vouchers in the following amounts: Family Unification Program Vouchers, 100; Non-Elderly Disabled Category II Vouchers, 40; Veterans Affairs Supportive Housing Vouchers, 476.

If funding becomes available, HABC will work closely with its partners, providers, and property owners/managers to utilize the current wait list and to fill all vacancies in a timely manner.

**New Housing Choice Vouchers to be Project-Based During the Fiscal Year
(These PBV's were awarded during FY2017; however, some of the project closings will be in FY2018).**

Property Name	Anticipated Number of New Vouchers to be Project-Based	Description of Project
Orchard Ridge V	16	16- PBV units (10-1 bedrooms, 5-3bedrooms, and 1-4bedroom) developed by Pennrose Properties, LLC are under construction on the former Claremont Homes and Freedom Village sites.
Episcopal Housing – Argyle	12	12 vouchers for homeless persons (12-1bedroom units) located at 1411 Argyle Street being developed by Episcopal Housing Corporation are in financing.
O'Donnell Heights Phase IB	16	This is new construction at O'Donnell Heights renamed Key's Pointe in southeast Baltimore. For Phase 1B joint venture development partners, Michaels Development and Greater Baltimore AHC will include a total of 68 newly constructed affordable rental units. HABC is providing 34 project-based vouchers for returning residents, NEDs and households needing the features of UFAS compliant units. The remaining 34 units will be affordable to households earning less than 60% of the area median.
Franklin Flats	7	7 LTA NED one bedroom units located at 20 Franklin Street developed by Osprey Property Company, LLC are under construction
Metro at Mondawmin	18	Metro at Mondawmin is a proposed 70-unit affordable rental housing development located in the Liberty Square neighborhood of West Baltimore. It is being developed by Enterprise Housing Corporation (developer/sponsor) and will include a mix of 1-, 2-, and 3-bedroom units for families earning between 30% and 60% of the Area Median Income (AMI), including eleven (11) units for NED residents (15%) and seven (7) units for homeless residents (10%).
New Shiloh	19	This project is a proposed 73-unit affordable low-income housing tax credit development for families. It is being co-developed by sponsor Bon Secour's Unity Properties, Inc., New Shiloh CDC, and development consultant Enterprise Homes, Inc (collectively, the "Developer") and will include a mix of 1-, 2-, and 3-bedroom units for families earning between 30% and 60% of the AMI, including 11 units for NED residents (15%) and 8 units (10%) serving people who would otherwise be homeless.
North Avenue Gateway	16	<p>North Avenue Gateway II project is a 65 unit family project located on the north side of the 3000 block of West North Avenue in Baltimore. Ten (10) one-bedroom units will be reserved for NED households. These units will be affordable to households with incomes at or below 30% of the AMI for a period of 40 years (LTA NEDs). The units will be integrated throughout the project to avoid concentration in any particular building or area.</p> <p>The North Avenue Gateway project will also have 6 one-bedroom units for homeless individuals. The City of Baltimore will reserve Section 8 Project Based Rental Subsidy for these 6 homeless units.</p>
L on Liberty	14	This new construction project is located at 213 -215 Park Avenue and 208 Liberty Street in Baltimore. The project will provide seventy-one (71) units of affordable housing and of those, 14 units will be reserved for tenants with incomes of 30% or less than the AMI. L on Liberty agreed to add 3 more NEDs units for a total of 14 NEDs units. These 3 additional units are in exchange for the reduction of units in J. Van Story Branch to create a third elevator in the building.
Restoration Gardens II	42	This project has forty-two (42) project-based vouchers for the

Property Name	Anticipated Number of New Vouchers to be Project-Based	Description of Project
		property located at 4201 York Road, and 501 ½ East 43 rd Baltimore. These are efficiency-sized units that are in financing and being developed by The French Development Company.
Paca	92	92 units for veterans located at 116-120 North Paca Street developed by Somerset Development Company, LLC is in pre-development
Walbrook	10	10 PBV units located at 2636 Walbrook Avenue developed by Osprey Property Company LLC and Coppin Height Community Development Corporation are in pre-development.
Marian House	6	6 units for homeless persons.
Shannon House	18	18 (14-2bedroom and 4-3bedroom) units for homeless persons located at 4613 Park Heights Avenue are in development by Sherick Project Management.
Project PLASE	56	56 PBV (all one bedroom) units located at 3549-3601 Old Frederick Road and developed by Project PLASE are in pre-development.

Anticipated Total New Vouchers to be Project-Based

342

Anticipated Total Number of Project-Based Vouchers Committed at the End of the Fiscal Year

2,225

Anticipated Total Number of Project-Based Vouchers Leased Up or Issued to a Potential Tenant at the End of the Fiscal Year

2,069

Other Changes to the Housing Stock Anticipated During the Fiscal Year

Vacant units at nine (9) mixed-population, family and mixed-finance developments scheduled for RAD conversion in FY 2018 will be held off-line for the temporary relocation of existing residents. In addition, HABC anticipates that its adjusted occupancy rate will be 97% primarily because of the uncertainty in allocations of funding to the housing operations division, and future appropriations.

General Description of All Planned Capital Fund Expenditures During the Plan Year

Gas Piping Survey and Mapping, Rehab for Training Facility, Domestic Hot Water Replacement, Condensate Receivers, Window and Door Replacements, Sump Pump Replacement and Installation, Installation of Energy Conservation Measures, Basketball Court Repairs, Electrical Distribution Upgrades, Heating System Repairs/Replacement, Playground Repairs/Replacement, Gas Pipe Replacement, Exit Light Fixture Installations, Dumpster Replacement, Roof Replacement, Handicap Accessibility Improvements, Structural Improvements, Elevator Improvements, Vacancies, Painting, Kitchen and Bathroom Upgrades, Emergency Repairs, Miscellaneous Site Work, Redevelopment of Replacement Housing, the , technical and non-technical salaries and benefits and associated capital operating costs, consultant fees, relocation, management improvements, resident anti-drug program, affordable homeownership, sub-metering maintenance and service, debt service and environmental related testing, improvements and training.

Planned Number of Households Served at the End of the Fiscal Year

MTW Households to be Served Through:

Federal MTW Public Housing Units to be Leased
 Federal MTW Voucher (HCV) Units to be Utilized
 Number of Units to be Occupied/Leased through Local, Non-Traditional, MTW Funded, Property-Based Assistance Programs

Planned Number of Households to be Served	Planned Number of Unit Months Occupied/Leased
7,655	91,860
13,305	159,660
0	0

Number of Units to be Occupied/Leased through Local, Non-Traditional, MTW Funded Tenant-Based Assistance Programs
Total Households Projected to be Served

0	0
20,960	251,520

***Includes 294 MTW Bailey and HABC Long-Term Affordable Project-Based Voucher units.**

Reporting Compliance with Statutory MTW Requirements

HABC is in compliance with all statutory MTW requirements.

Description of any Anticipated Issues Related to Leasing of Public Housing, Housing Choice Vouchers and/or Local, Non-Traditional Units and Possible Solutions

Housing Program	Description of Anticipated Leasing Issues and Possible Solutions
Public Housing	HABC anticipates delays in leasing within the Scattered sites portfolio as it evaluates the viability of its single family properties prior to the make ready process. Units deemed non-viable will undergo the HUD disposition process.
The Housing Choice Voucher Program	Under its ACC, HABC's HCVP-MTW funding limits the number of households for which assistance can be made available to no more than approximately 13,500 (this funding limitation does not affect Thompson-MTW, HUD-VASH, New Construction or Moderate Rehabilitation vouchers). Uncertainty concerning the level of available HAP funding to be provided to HABC for CY 2017 is an additional contributing factor in determining projected utilization.

C. Waiting List Information

HABC maintains its waiting lists in conformance with the policies described in the Public Housing Admissions and Continued Occupancy Policy (ACOP) and the Housing Choice Voucher Program Administrative Plan. As of December 31, 2016, there are a total of 63,804 applicants for HABC's programs including: 27,644 public housing-only applicants; 30,516 HCV-only applicants (tenant and project-based); and, 5,644 applicants on both the public housing and HCV waiting lists.

The Housing Choice Voucher Waiting List

The HCV tenant-based voucher waiting list is closed; however the HCV project-based voucher waiting list is open for seniors and families needing a one, two or three-bedroom. The project-based waiting list will close on June 30, 2017. HABC will reopen the HCV waiting lists as necessary to ensure that there are an adequate number of applicants for available vouchers over a twelve-month period.

The Public Housing Waiting List

In March 2016 HABC began the process of purging its public housing waiting list. Because of the substantial number of applicants who did not respond to the 3 attempts to contact them (roughly 45%) HABC suspended the purge in October 2016 to further review the impact and assess the process of purging.

In FY 2017, HABC was approved to convert its public housing waiting list to a Centrally-Administered Location Based (CALB) Waiting List. In the approved FY2017 Annual Plan HABC stated that the Location-Based Waiting List will allow applicants to identify three sites where they

would accept an offer. Once their choices are known, the applicant's name will be listed on the appropriate CALB waiting lists. Applicants will be listed on the CALB waiting lists in sequence based upon:

- Applicable preference factors;
- Date and time of application.

Applicants from the CALB Waiting list will be selected to form a final eligibility "pool" based on the units (including size and type) expected to be available after applicants complete the verification and screening process. HABC will offer the dwelling unit to eligible applicants at the top of the appropriate eligibility pool. Applicants will be housed in the first available unit as indicated by their preference. HABC expects to start operation of the CALB in FY2018.

The Public Housing and Housing Choice Voucher Waiting List

When seeking housing assistance many families choose to apply for both the public housing and the HCV programs. The date and time of the application for one program does not necessarily share the date and time for the other; however to obtain a true and accurate count of the number of families on HABC's waiting lists, these families are counted separately from the public housing and HCV waiting lists.

Currently the public housing waiting list is open and the HCV project-based voucher waiting list is open for seniors and families needing a one, two or three-bedroom. HABC will close the HCV project-based waiting list on June 30, 2017. The public housing waiting list will remain open. When the project based voucher waiting list closes, families who want to apply for both public housing and the HCVP will only be allowed to apply for public housing.

The Thompson Waiting List

Pursuant to the Thompson Settlement Agreement, the waiting list for Thompson PCD Vouchers and Thompson Remedial Vouchers is maintained by BRHP and is separate from any other HABC waiting list for housing assistance. Application for, receipt of, or termination of a Thompson Voucher will not affect a family's standing on any other HABC waiting list. A copy of the waiting list procedures for the Thompson-related programs is described in the Special Administrative Plan as Appendix II in the HABC HCV Administrative Plan. As of December 30, 2016, there were 11,985 families on the waiting list for the Thompson Vouchers and 1,033 families were enrolled in the BRHP mobility counseling program that applicants for a Thompson Voucher must complete before receiving a Thompson Voucher. The BRHP waiting list for Thompson Vouchers is closing on March 31, 2017.

Wait List Information Projected for the Beginning of the Fiscal Year

Housing Program(s)	Wait List Type	Number of Households on Wait List	Wait List Open, Partially Open or Closed	Are There Plans to Open the Wait List During the Fiscal Year
Federal MTW Housing Choice Voucher Units: Tenant-Based	Community Wide	23,442	Closed	No
Federal MTW Housing Choice Voucher Units: Project-Based	Site-Based	7,074	Opened December 30, 2015. Will close June 30, 2017	No
Federal MTW Public Housing Units	Community Wide	27,644	Open	N/A
Federal MTW Public Housing & HCVP Units	Merged	5,644	The Public Housing waiting list is open; the Tenant-based HCV waiting list is closed and the Project-based waiting list will close on June 30, 2017.	No. There are no plans to open either the Tenant-based or Project-based waiting lists in FY 2018.
Thompson Voucher Units	Program Specific	11,985	Open	No. This wait list will close on March 31, 2017

For Partially Open Wait Lists, provide a description of the populations for which the waiting list is open:

N/A

If Local, Non-Traditional Housing Program, please describe:

N/A

If Other Wait List Type, please describe:

N/A

If there are any changes to the organizational structure of the wait list or policy changes regarding the wait list, provide a narrative detailing these changes.

In FY 2017, HABC was approved to convert the public housing waiting list to a Centrally-Administered Location Based (“CALB”) waiting list. HABC expects to implement the CALB waiting list in FY2018. Once operational, applicants may choose up to three (3) sites where they wish to reside. Once their choices are known the applicant’s name will be listed on the appropriate CALB waiting lists. Applicants will be listed on the CALB waiting lists in sequence based upon:

- Applicable preference factors;
- Date and time of application.

Applicants from the CALB waiting list will be selected to form a final eligibility "pool" based on the units (including size and type) expected to be available after applicants complete the verification and screening process. HABC will offer the dwelling unit to eligible applicants at the top of the appropriate eligibility pool. Applicants will be housed in the first available unit as indicated by their preference.

D. Housing Stock Information

In Fiscal Year 2018, HABC will implement a wide range of capital investments at existing public housing sites and continue its program of citywide housing development activities. HABC projects it will expend a total of approximately \$48.8 million on capital activities in the coming year.

HABC has provided an update to the Asset Management Table in Appendix B which describes the current status of each public housing site, outlines certain risk factors that will be monitored over the life of the MTW Demonstration, and describes possible outcomes of these risks. It is designed to serve as the conceptual basis for current and future years' planning. As a result of our preliminary findings in HABC's portfolio wide asset review, we have updated the Asset Management table to identify sites where redevelopment, conversion, homeownership, demolition, disposition, management improvements and other activities may take place in the future; however, it is subject to periodic change based on priorities and available resources. It is important to note, that HABC is participating in the RAD Program. The properties approved for RAD Phase I and Phase II are identified in the Asset Management Table. The removal of these properties from HABC inventory will result in a decrease in HABC's Capital Subsidy of approximately \$4.7 million.

In 2006, HABC used its MTW authority to allocate Housing Choice Voucher (HCV) funds to complete planned capital activities. HABC used the funds to renovate long-term vacant units, to modify units for handicap accessibility and to improve physical conditions to ensure long term viability of existing inventory. These funds have been fully committed since 2014 and are expected to be fully expended by the end of FY 2017.

HABC is also in the process of completing its Green Physical Needs Assessments (GPNA) and any needs identified in the GPNA are being included as part of HABC's long term Capital Plan.

Pursuant to the MTW Agreement, as mentioned above, HABC has combined all current and prior year Capital funds, including RHF funds, into the MTW Block Grant that will be carried out in accordance with all HUD regulations, including 24 CFR Part 905, and other requirements applicable to the Capital Fund Program.

Spending Plan				FY'18
Year of Funding Award	AMP No.	Development Name	Description of Work	Original MTW Planned Spending July 1, 2017 - - June 30, 2018
FFY 15, 16, 17	1	Latrobe Homes	Gas Piping Survey and Mapping, Training Facility, Domestic Hot Water Replacement, Window Replacement and Door Caulking, Repair/Replace 504 Ramps, Replace/Install Sump Pumps, ECM's	1,815,000
FFY 15, 16, 17	2	McCulloh Homes	Basketball Court Repairs	20,469
FFY 15, 16, 17	3	Perkins Homes	Domestic Hot Water Replacement, Condensate Receivers	395,000
FFY 15, 16, 17	5	Douglass Homes	Electrical Distribution Upgrades, Domestic Hot Water Replacement, Install Sump Pumps, Steam Heating System (Radiator Controls and Traps), Playground Repair	3,988,480
FFY 15, 16, 17	6	Gilmor Homes	Exit Light Fixtures, Dumpsters	111,952
FFY 15, 16, 17	9	Key's Point	Phase 1 B - Partial Funding for 68 Rental Units	3,440,337
FFY 15, 16, 17	9	O'Donnell Heights	Emergency Repairs, Demolition of 74 Units	1,100,000
FFY 15, 16, 17	11	Cherry Hill	Roof Replacement (MD 2-12 and MD 2-17), Windows MD 2-11, Replace HVAC, Repair/Replacement of Playgrounds, Repair Basketball Court, Replace/Install Sump Pumps, ECM's	3,799,740
FFY 15, 16, 17	21	Brooklyn Homes	Repair/Replace 504 Ramps, Gas Pipe Survey and Mapping	185,000

Spending Plan				FY'18
Year of Funding Award	AMP No.	Development Name	Description of Work	Original MTW Planned Spending July 1, 2017 - - June 30, 2018
FFY 15, 16, 17	22	Mt. Winans/Westport	Replace Furnaces, Gas Pipe Survey and Mapping, Replace Wood Decking (2nd floor apartments)	861,094
FFY 15, 16, 17	31	Rosemont	Install ADA Ramp at Mgmt Office, Gas Pipe Replacement, Replace Exterior Doors, Furnace Replacement	1,772,994
FFY 15, 16, 17	31	Dukeland	Playground Equipment, Furnace Replacement	93,172
FFY 15, 16, 17	41	J. Van Story Branch (West Twenty)	Elevators and RAD Related Improvements	1,000,000
FFY 15, 16, 17	42	Somerset Extension	RAD Related Improvements	3,960,889
FFY 15, 16, 17	45	Hollander Ridge	Redevelopment for Replacement Housing (potential RAD)	9,990,147
FFY 15, 16, 17	200, 201, 202, 203 (including Laurens House, Carey House, and Oswego Mall)	Scattered Sites	Roof Replacement, Vacancy Renovation, Basement Waterproofing, Window Replacement, Painting, Replace Lighting with LED Fixtures	1,796,947
FFY 15, 16, 17	Various	Perkins, Douglass, Poe, Rosemont, Dukeland, Oswego, McCulloh LR, Laurens, Mt Winans, Spencer, Carey	Infrastructure Projects	2,000,000

Spending Plan				FY'18
Year of Funding Award	AMP No.	Development Name	Description of Work	Original MTW Planned Spending July 1, 2017 - - June 30, 2018
FFY 15, 16, 17	Various	Perkins, Douglass, Poe, Rosemont, Dukeland, Oswego, McCulloh LR, Laurens, Mt Winans, Spencer, Carey	Install Low Flow Faucet Aerators in Tenant Apartments and Common Areas (ECM)	655,344
FFY 15, 16, 17	Various	Perkins, Douglass, Poe, Rosemont, Dukeland, Oswego, McCulloh LR, Laurens, Mt Winans, Spencer, Carey	Install Efficient Lighting in Tenant Apartments and Common Areas (ECM)	178,704
FFY 15, 16, 17	Various	Perkins, Douglass, Poe, Rosemont, Dukeland, Oswego, McCulloh LR, Laurens, Mt Winans, Spencer, Carey	Install Electric Sub meters for apartments (ECM)	728,750
FFY 15, 16, 17	Various	Perkins, Douglass, Poe, Rosemont, Dukeland, Oswego, McCulloh LR, Laurens, Mt Winans, Spencer, Carey	Install New Programmable/Fixed Set-Point Thermostats for Apartments and EMCS Upgrades	717,581
FFY 15, 16, 17	AMPS	Authority-Wide	Electrical Distribution Upgrades, Domestic Hot Water Replacement, Install Sump Pumps, Steam Heating System (Radiator Controls and Traps), Playground Repair	1,005,502
FFY 15, 16, 17	AMPs	Authority-Wide	Kitchens, Baths, Windows, Electrical, Mechanical, Non-Dwelling Structures, Vacancy Renovation	1,237,723

Spending Plan				FY'18
Year of Funding Award	AMP No.	Development Name	Description of Work	Original MTW Planned Spending July 1, 2017 - - June 30, 2018
FFY 15, 16, 17	AMPs	Authority-Wide	Submetering Maintenance and Service	30,000
FFY 15, 16, 17	AMPs	Authority-Wide	Consulting Fees - A & E, Environmental, Utility and Env. Training	661,000
FFY 15, 16, 17	AMPs	Authority-Wide	Consulting Fees - Legal, Planning, IT, etc.	180,000
FFY 15, 16, 17	AMPs	Authority-Wide	RAD Contingency	186,660
FFY 15, 16, 17	Central Office	Central Office	Technical Salaries	1,435,570
FFY 15, 16, 17	Central Office	Central Office	Non-Technical Salaries and Benefits	974,811
FFY 15, 16, 17	Central Office	Central Office	Resident Meetings and Training	9,600
FFY 15, 16, 17	Central Office	Central Office	Utility Consultant	150,000
FFY 15, 16, 17	Central Office	Central Office	Operating Costs, Sundry and Audit Fees	522,248
FFY 15, 16, 17	Central Office	Central Office	Debt Service-1st and 2nd Phase EPC	3,819,092
GRAND TOTAL				48,823,806

504 Accessibility Improvements

In FY 2018, HABC will continue to: (i) maintain existing UFAS units, common areas and accessible routes to ensure continued compliance with UFAS and the 2010 ADA standards; and (ii) modify units to meet reasonable accommodation and immediate need requests.

To date 741 of 756 UFAS units have been created and certified under the Bailey Consent Decree. To meet HABC's obligations of 756 UFAS units under the Bailey Consent Decree, an additional 15 UFAS units must be certified:

- 15 additional units are under construction with completion of all units expected in 2018.

An additional four three-bedroom units compliant with the [Uniform Federal Accessibility Standards](#) will also need to be created due to HABC's [plan for the partial demolition of units at Gilmor Homes](#). HABC is doing preliminary planning and through this process will determine where the additional 4 three-bedroom UFAS units will be located. HABC may use Capital funds to create these UFAS units.

Infrastructure and Extraordinary Maintenance

Major work scheduled for the last quarter of FY 2017 and being completed in FY 2018 includes: the replacement of roofs at various scattered sites; the upgrade of the electrical distribution system at Douglas Homes; the replacement of windows and/re-caulking at various scattered sites; the replacement of sidewalks and erosion control at Latrobe, Cherry Hill, McCulloh, Douglas, Westport, Dukeland, Rosemont, Brooklyn, Spencer Gardens, Perkins, Poe, and Gilmor; and the renovation of long term vacant scattered site and family site units. Heating systems at Cherry Hill and McCulloh Homes are undergoing boiler room upgrades as needed. Other work scheduled for FY 2018 would be the renovation of bathrooms and kitchens at various family sites; basement water proofing in various scattered sites units; and the renovation of the old daycare center at Latrobe Homes which will become a new training facility and maintenance storage space. Gas piping projects and mapping at various locations are also underway. Playgrounds remain a priority and will be addressed as needed. HABC is also studying the viability of reviving the daycare centers at Brooklyn Homes and Westport Homes for youth activities. Exterior lighting at various sites will be evaluated and incorporated into the EPC if possible.

HABC will conduct Agency-wide electrical studies for electrical systems at various developments. Those studies could result in various levels of electrical system work depending on the extent of the work and available funding. As part of the future planning for O'Donnell Heights some of the site will be blocked up and/or demolished as per HUD approval. HABC continues to investigate and strategize for extraordinary maintenance issues at Somerset Extension (underground water leaks) and J. Van Story Branch (elevators). Due to repeated requests from the tenant council, HABC may build a Tenant Council office at McCulloh Homes.

HABC is committed to continuing work on the investigation and repair of drainage and erosion problems at various sites; addressing trip hazards; repairing/replacing 504 ramps; installing and repairing fencing; and conducting tree trimming as needed.

HABC will continue its testing for lead based paint, the abatement of asbestos and the removal of underground fuel oil tanks as required and will continue to respond to all other environmental concerns.

In FY 2018, HABC may: (i) continue to develop master plans which note physical areas of concern and a course of action to rectify them (landscaping, egress, hazards, etc.); and (ii) perform major renovations at various developments and a portion of the scattered site inventory to further reduce vacancies; overhaul the archive system and set up the disaster recovery/emergency response system at Duncanwood.

Energy Performance Contracting

HABC will continue monitoring, measurement and verification efforts for the Phase I EPC properties, (Latrobe, Cherry Hill, Gilmor, Westport and Brooklyn). An additional EPC Program has been planned for the installation of conservation measures (lighting, water conservation fixtures, utility metering and system upgrades) at selected properties in the amount of \$10-\$15 million. The second EPC is planned for a total of 15 years with two years of construction. Once the EPC financing is established in the last quarter of 2017, installation should commence in the first quarter of FY 2018. As a part of the EPC strategic plan, HABC re-negotiated Veolia steam contracts for service to Perkins Homes, Douglass Homes and Cherry Hill Homes.

HABC has solicited a 3rd party utility billing company to handle resident excessive consumption charges. HABC's Energy & Environmental Programs Department will oversee this company in close collaboration with other agency departments.

Partnerships

HABC is coordinating with BGE to identify the list of properties (mostly scattered sites) for meter upgrade/removal/inspection or maintenance. Work will start in FY 2017 and end in FY 2018.

HABC continues to evaluate and/or propose projects with various partners such as the Weatherization Assistance Program and the Parks & People Foundation. HABC continues its partnership with the Mayor's Office of Criminal Justice (MOCJ) and Information Technology (MOIT). Camera maintenance, safety and security concerns, and safety grants are some of the work performed as a result of these partnerships. Additionally, there will be a review of the useful life of camera equipment at Cherry Hill, Gilmor, Latrobe, McCulloh, and Perkins.

E. Neighborhood Development Activities and Expenditures

HABC's housing development accommodates three distinct strategies, which include MTW funds and proposed public and private leveraged funds. Each of the three strategies (Neighborhood Reinvestment, New Housing Production, and Bailey Consent Decree Housing Production) is summarized below. As these projects are all in various phases of the development process, the final unit numbers and development approach may vary from those presented below.

Neighborhood Reinvestment

Under the Neighborhood Reinvestment Program, HABC works with private development partners and Baltimore neighborhoods to re-capitalize the distressed scattered site public housing stock in strengthening neighborhood markets, linking their redevelopment to a larger program of market-rate rental and for-sale production. The public housing component of these projects will result in a permanently affordable rental housing resource in improving neighborhoods, ensuring economic diversity. This program achieves the mixed-finance redevelopment of existing ACC (public housing) units. The narrative below describes FY 2018 goals and activities in this strategy area:

Barclay – HABC procured Telesis as its development partner in the redevelopment of the Barclay neighborhood. Telesis completed a redevelopment plan calling for the new construction and rehabilitation of approximately 322 mixed-income housing units. The first two rental phases of 141 affordable units have been completed. The first affordable homeownership phase consisting of 35 rehabilitated units was completed in FY 2014 and sold to families who earn 120% of AMI.

The construction of Homeownership Phase 2 commenced in FY 2017 with completion of the first 12 rehab units projected to occur in FY 2018. Plans for the site also include the construction of a small park to begin in FY 2018 surrounded by 18 new construction homeownership units in the 300 block of E. 20th Street. Additionally, Rental Phase 3 has been awarded LIHTC for the creation of 57 rental units, which include nine 9 units reserved for Chronically Homeless Persons and three (3) LTA UFAS compliant units for persons needing wheelchair accessible units. Rental Phase 3 is under construction with an expected completion date in the last quarter of 2017.

New Housing Production Program

HABC's New Housing Production Program for mixed-income, mixed finance development involves the complete transformation of distressed sites. In FY 2018, HABC will continue to sponsor significant mixed-income residential development at several locations across the City, resulting in a variety of housing choices for low-income households in the city.

Orchard Ridge (formerly Claremont/Freedom) – Habitat for Humanity of the Chesapeake completed the construction of the 30 remaining affordable homeownership units in Phase I. Pennrose was awarded 9% LIHTC to construct 65 affordable rental units (Rental, Phase V). Pennrose closed on the financing in January 2016 and commenced construction with an expected completion date of the third quarter of CY 2017.

O'Donnell Heights – O'Donnell Heights was constructed in 1942 and included 900 public housing units. Of these, 596 have been demolished and 304 remain on-line. The plan for the 62-acre site is for the demolition of the remaining housing units and the creation of a 925-unit mixed income residential community to include the replacement of low income housing units on site. The redevelopment of O'Donnell Heights is to be completed in multiple phases.

The first phase of the O'Donnell Heights redevelopment, identified as Phase 1-A, located on the eastern half of the south/east quadrant of Boston and Gusryan Street is complete. This is primarily a townhome community, totaling 75 affordable rental units and 1 management office. Of the 75 rental units, 39 are deeply affordable because they are subsidized by project based vouchers and 36 rental units are affordable to households earning less than 50% of area medium income.

Phase 1-B will include a total of 68 newly constructed affordable rental units. HABC is providing 34 project-based vouchers for returning residents, NEDs and households needing the features of UFAS compliant units. The remaining 34 units will be affordable to households earning less than 60% of the area median. Financial closing for this project is expected to take place during the 2nd quarter of FY2017. Phase I-B is part of a LIHTC application that was submitted to the Maryland Department of Housing and Community Development in March 2016 and awarded in the summer of 2016. Pursuant to HABC's MTW Agreement, as amended, HABC's RHF Funds will also provide a source of funding for the project in the form of a loan to the owner entity to support the developments costs, including a portion of which will be used as collateral for the tax-exempt bond debt.

HABC is requesting demolition approval for 74 units located on the sloping northwest corner of the site which has been experiencing water supply line breaks resulting in storm water and groundwater infiltration of the units. It was originally HABC's plan to continue to maintain the remaining 304 units until Phases 1 and 2 were completed. However, these specific 74 units have continued to show signs of distress and costly repairs, beyond routine maintenance. In addition, the non-functioning Day Care Facility on this site is beyond repair because it has experienced extreme vandalism and it is creating unsafe and unsightly conditions for the residents of this community.

The demolition of these units and the daycare center will help to facilitate the continued redevelopment efforts in the O'Donnell Heights community and specifically eliminate the unsafe and unsightly conditions created by these units and the day care facility.

Bailey Consent Decree Housing Production

HABC has approved a number of projects that will create more NED units than required by the Bailey Decree, as amended. Therefore developers will no longer be offered incentives to produce NED units.

New Construction of Scattered Site Units –Thirty-five of the 37 new construction scattered sites UFAS compliant homes for persons with mobility impairments have been completed and certified. The units are located in various neighborhoods throughout Baltimore City. The last phase consists of 2 units which are currently under construction with an expected completion date at the end of April 2017.

Additional Ten NED Units – In addition, 10 NED units will be created through the acquisition and rehabilitation of units in neighborhoods identified in the Bailey Supplemental Decree.

Other Development Activities

HABC is considering development of a number of other sites. Activities on these sites in FY 2018 could include master planning, the issuance of RFPs or RFQs, the execution of Land Disposition or Master Development Agreements, the provision of MTW funds to developers, demolition, site clearance, and remediation, and other pre-development and development work.

The Thompson Settlement Agreement - To meet the public housing unit production requirements of the *Thompson Settlement Agreement* BRHP, pursuant to a contract with HABC, is undertaking the following:

- Project-Based Development Program - Under the *Thompson* Settlement Agreement, BRHP is continuing the project based development program that was started under the *Thompson* partial consent decree. BRHP is implementing a project based development program to create project based units in Communities of Opportunity. Subject to funding availability, BRHP is making pre-development funding and, if needed, subordinate secondary financing using the Urban Revitalization Demonstration Grant funds awarded for the Homeownership Demonstration Program (MD-06-URD-002-I294) available to pre-qualified developers and property owners who develop housing units and agree to enter into long term project-based voucher contracts. Under this initiative, BRHP's goal is to create 40 new project-based units in communities of Opportunity in HABC's 2018 Fiscal Year.

Rental Assistance Demonstration – HABC has a backlog of up to \$800 million of capital needs and an inadequate amount of capital funding. Under the Rental Assistance Demonstration (RAD) , HABC may convert a development to Project Based Voucher (“PBV”) or PBRA funding and leverage private debt and low income housing tax credits making it possible to rehabilitate the building for the long term without displacing the existing residents. Units will be occupied by applicants from HABC's public housing waiting list and the HABC Reasonable Accommodation transfer waiting list. The PBV or PBRA subsidy replaces the ACC contract subsidy. HABC has taken steps to assure that residents' rights are largely the same. In addition, residents have the benefit of receiving a tenant-based housing choice voucher after two years of occupancy at the resident's option if the resident is in good standing and subject to funding availability.

HABC received a portfolio award for conversion of twenty-four (24) public housing sites, under RAD. The projects that have converted under RAD are: Allendale, BE Mason, Bel Park, Brentwood, Chase, Ellerslie, Govans Manor, Hollins House, Lakeview, McCulloh Extension High-Rise, Primrose Place, Pleasant View Gardens Senior, Pleasant View Gardens Townhomes, and Wyman House. The following projects are in the financing process: Broadway Overlook, Somerset Extension, Monument East, Rosemont Tower, J Van Story Branch, Hillside Park, Arbor Oaks, Townes at the Terraces, Terraces Coop, Heritage Crossing, and Homes for Arundel (58 units created pursuant to the Thompson PCD). In addition, HABC plans to acquire and rehab approximately 100 scattered sites units using Hollander Ridge HOPE VI funds. These units will initially be public housing ACC units but are intended to be converted to PBRA under RAD.

Perkins Homes – HABC is applying for a Choice Neighborhoods Initiative (CNI) implementation grant in FY 2018 for Perkins Homes. The Transformation Plan will integrate the Oldtown and Somerset Master Plans with the Perkins Transformation Plan to create a single seamless plan; the Perkins-Somerset-Oldtown Transformation Plan.

Somerset Homes – HABC will submit a disposition application for the sale 8.64 acres of vacant land to the development entity PSO Housing Company, LLC. This site was the location of the public housing development formerly known as Somerset Homes which was demolished in 2009. The Somerset-Old Town Mall Master Plan generally calls for mixed-use and mixed-income housing development. HABC expects to replace the former Somerset units with a mix of low income, affordable and market rate housing. It is the goal of this mixed-finance development to provide one-third of the units as public housing in the residential mix along with some commercial and retail development over the total development site (Somerset Homes and Oldtown Mall).

In FY 2014, HABC issued a Joint Request For Proposals with the Baltimore Development Corporation (BDC), the entity in control of the adjacent 7.5 acres of City-owned property. BDC is the City of Baltimore's economic development arm. Several responses were received and a development team was issued a Right of Entry and an Exclusive Negotiating Privilege in FY 2015.

HABC and the City expect to integrate the Oldtown and Somerset Master Plans with the Perkins Transformation Plan to create a single seamless plan; the Perkins-Somerset-Oldtown (PSO) Transformation Plan.

Hollander Ridge HOPE VI Project –HABC will acquire and rehabilitate approximately 100 units in Baltimore City pursuant to the Thompson Settlement Agreement. The properties will be scattered site units in areas of Baltimore City identified in the Thompson Settlement Agreement. Once acquired, they will be public housing rental units until such time as HUD approves the conversion of the Hollander Ridge units under RAD.

Approximately \$18.85 million of HOPE VI funds that were originally designated for the redevelopment of the Hollander Ridge site are to be used to acquire and rehabilitate properties that will be replacement housing for both former Hollander Ridge residents and former or current O'Donnell Heights residents.

Pursuant to the Thompson Settlement Agreement, HABC will also make available the equivalent of \$7,140,000 ("Replacement Funds"). The Replacement Funds may be used in conjunction with FY 1996 HOPE VI Funds originally awarded to HABC for Hollander Ridge ("HOPE VI Funds") to develop one or more scattered site projects. The Replacement Funds may be from any available source including, but not limited to, low income housing tax credits, the State Partnership Rental Housing Program, other State housing funds, low income housing bond funds, private debt or equity, public housing funds or MTW funds. However, the Replacement Funds may not be taken from the HOPE VI Funds.

Pursuant to Section 504 of the Rehabilitation Act of 1983 and HUD's implementing regulations, at least five-percent (5%) of the units acquired under the Hollander Ridge Revitalization Plan will meet federal accessibility requirements for wheelchair users and HABC will require the developer to make 2% of the Hollander Ridge units hearing/vision compliant. Once the units have been acquired and an assessment completed, HABC will determine which units will be wheelchair accessible.

F. Leasing Information – Planned

Public Housing Projected Leasing

HABC's projected adjusted occupancy rate for MTW public housing inventory and leasing as of June 30, 2018 is 97.0%. The total number of MTW public housing units to be leased as of June 30, 2018 is 6,135 due to the RAD conversion of fourteen (14) mixed-population, family and mixed-finance sites.

Section 8/Housing Choice Voucher Program Projected Leasing

Table 2 provides a summary of HABC's Tenant-based and Project-based MTW Housing Choice Voucher programs including current leasing rates and projected leasing through June 30, 2018. Also included are non-MTW units under the VASH, Moderate Rehab, Substantial Rehab and New Construction programs, and HUD Tenant Protection Vouchers

**Table 2:
Housing Choice Voucher Program FY 2017 Projected Leasing**

	Projected Leased as of 6/30/17	Projected Leased as of 6/30/18
MTW Tenant Based Vouchers (Non Consent Decree)	10,635	10,307
MTW Project Based Vouchers (Non Consent Decree)	1,400	1,450
MTW Tenant Based Vouchers – Bailey	838	850
MTW Project Based Vouchers – Bailey	462	570
<i>Family Unification Program (FUP)</i>	98	98
<i>Non-Elderly & Disabled, Category II (NEDs Cat II)</i>	38	38
<i>Sub-Total</i>	<i>13,471</i>	<i>13,313</i>
MTW PCD Vouchers – Thompson	1,764	1,762
MTW Remedial Vouchers – Thompson	1,328	2,340
MTW Homeownership Vouchers - Thompson	40	40
<i>Sub-Total</i>	<i>3,092</i>	<i>4,142</i>
TOTAL MTW VOUCHERS	16,563	17,455
Non-MTW Section 8 Moderate Rehab	290	270
Non-MTW Section 8 New Construction/Substantial Rehab	596	596
Non-MTW VASH Vouchers	449	447
<i>Sub-Total</i>	<i>1,335</i>	<i>1,313</i>
TOTAL ALL	17,898	18,768

Under its ACC, HABC expects to provide assistance for approximately 13,300 by the end of FY 2018. The requirement for additional project-based units under the Bailey Consent Decree may require a decrease in tenant-based voucher holders or an increase in funding or both.

Uncertainty concerning the level of available HAP funding to be provided to HABC for CY 2017 is an additional contributing factor in determining projected utilization.

III. Proposed MTW Activities

This section of the MTW Annual Plan provides information on new MTW activities proposed for FY 2018.

26. Landlord Payment Methods and Electronic Communications (HABC Leased Housing)

Description of MTW Activity: Currently, HABC communicates with landlords in a variety of formats, including email, fax, US mail and phone. Housing Assistance Payments (HAP) are delivered via direct deposit or sent in a check via US mail. The time and cost to prepare print, and mail landlord/owner notices, payments, inspection results and other communications is administratively and financially burdensome. In FY2018, HABC will require that all HCV landlord/owners receive all communications from HABC electronically. Further, HABC will require landlord/owners to receive HAP payments via direct deposit only. Approximately 10 of the 3,300 landlords still receive paper checks.

In the event that a landlord/owner opts out of the electronic delivery/direct deposit requirement, using its MTW authority, HABC will charge the owner an administrative fee equal to 1% of the HAP. The administrative fee structure will be two-tiered; a 1% fee will be assessed for paper copies of letters, notices, reports, etc. and another 1% fee for paper checks. Under no circumstances will an administrative fee be deducted from a landlords HAP.

Landlords currently pick up paper checks at the HABC Accounts Payable Office. With the implementation of the new surcharge, landlords will be required to show proper identification, and to submit payment in order to receive their check. Payment can be made by check or cash. In addition a 1% fee will be assessed against landlords who received paper communications from HABC during a given month. The landlords will be notified and billed of such assessments through HABC's Accounts Receivable division.

Implementation of this communications initiative is in accordance with the Paperwork Reduction Act of 1995. HABC will amend the HAP contract to reflect this requirement. HABC will apply this policy to all paper statements, letters, inspection reports, and Housing Assistance payments.

Statutory Objective: This initiative will support the MTW Statutory objective to reduce costs and achieve greater cost effectiveness in federal expenditures.

Anticipated Impact: HABC anticipates that this activity will improve efficiency and reduce costs by simplifying program administration and reducing expenditures on office supplies and postage.

Anticipated Timeline: Full implementation of this activity is anticipated by the end of FY2018.

Metrics:

CE #1: Agency Cost Savings				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Dollars saved as a result of this activity (decrease).	\$854,294 (72,000 communications to landlords)	\$136,380 (72,000 electronic communications to landlords) HABC may re-establish benchmark upon final implementation of this activity.		

CE #2: Staff Time Savings				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Staff hours saved as a result of this activity (decrease).	36,000 hours (72,000 communications @ 30 mins per communication)	6,000 hours (72,000 communications @ 5 mins per communication) 83% reduction HABC may re-establish benchmark upon final implementation of this activity.		

Data Source: HABC will use data collected from its software systems to determine the labor and supply savings generated from implementation of this initiative.

Authorization Standard: MTW Agreement, Attachment C, Paragraph D (1) a – The agency is authorized to determine the term and content of the Housing Assistance Payment (HAP) contracts to owners during the term of the MTW demonstration. This authorization waives certain provisions of the Section 8 (o) (7) of the 1937 Act and 24 CFR § 982.162 as necessary to implement HABC’s Annual MTW Plan.

IV. Ongoing MTW Activities

A. Implemented Activities

Public Housing

1. *Public Housing Multi-Year Recertifications*

Description/Update of MTW Activity: Multi-Year Recertifications (2006): HABC is responsible for reexamination and verification of household income, household composition and other eligibility data. Under the original HUD approved activity, HABC indicated that it would conduct a reexamination of household income and composition for all households one time every twenty-four (24) months.

Proposed Changes: In FY 2016, HABC transitioned all public housing households to either a two-year or three-year recertification schedule. The three-year recertification schedule was implemented for households whose source of income was solely from a fixed source. Two-year recertifications were implemented for all other public housing households. No additional MTW waivers are required for the three-year recertification schedule modification. Households may request an interim recertification if needed pursuant to HABC's current policy.

Approval and Implementation: Approved in 2006 and implemented in 2011. Placed on hold FY 2014; reactivated in FY 2016.

Changes to metrics, baselines, and benchmarks: None

Impact Analysis: There is no negative impact for any tenant placed on a two or three-year cycle for rent calculation; however HABC believes that a multi-year recertification cycle will achieve greater cost effectiveness in Federal expenditures by reducing the amount of money, at least by half, the agency spends on this activity and also the amount of time staff spends to complete the activity.

Hardship Policy: Our current policy allows residents to request an interim change at any point during the recertification cycle for loss of income and HABC has no plans to change the policy.

Description of Annual Reevaluation of Rent reform Activity: HABC will reevaluate this activity on an annual basis and report its findings in the MTW Annual Report. The reevaluation will include the cost savings realized by the agency and time saved by HABC staff.

Transition Period: HABC is implementing changes to the frequency of reexaminations. A letter will be mailed to all households informing them of the changes including:

- The family's new re-exam frequency;

- Date of the last and next regular re-exam; and
- A Regular and Interim Re-exam Fact Sheet.

Board Adoption and Public Hearing: This policy was adopted by HABC’s Board of Commissioners as part of the FY17 MTW Annual Plan. The Board Resolution is attached as Appendix A in the Plan. The public hearing for the Annual Plan held on Tuesday March 22, 2016 also served as the Public Hearing for the Multi-Year Recertifications Policy. The policy was presented to public housing and Housing Choice Voucher residents as well as the Resident Advisory Board at several meetings prior to the Public Hearing.

2. On “HOLD”. See Section C(2H). MTW Homeownership Program (Public Housing)

3. Asset Self-Certification

Description/Update of MTW Activity: To streamline operations, HABC will allow residents to self-certify income from assets with total asset values per household of less than \$5,000.

Proposed Changes: None

Approval and Implementation: 2011

Changes to metrics, baselines, and benchmarks: None

Leased Housing

4. “CLOSED” See Section D(15C): Risk Based Inspections

5. HCV Multi-Year Recertifications

Description/Update of MTW Activity: Two-Year Recertifications (2006): HABC is responsible for reexamination and verification of household income, household composition and other eligibility data. HABC will conduct a reexamination of household income and composition for all households one time every twenty-four (24) months. The 24-month reexamination policy does not apply to:

- Residents living in Mod Rehab and Mod Rehab SRO units
- Residents with other vouchers that do not qualify based on HUD funding restrictions.
- Residents with Homeownership vouchers
- Residents with HUD Awarded Special vouchers (Veterans Affairs Supportive Housing (VASH)).

Three-Year Recertifications (2013): HABC transitioned elderly and/or disabled families on fixed incomes to a three year recertification schedule. All other families remain on a two-year cycle except for the Non-MTW voucher families noted above.

Proposed Changes: Any member of the family may have fixed income for the household to qualify for the three-year recertification schedule.

Approval and Implementation: 2006 – Two year recertifications were implemented in 2007 and three year recertifications were implemented in 2014.

Changes to metrics, baselines, and benchmarks: None

6. *Limits on Project Based Vouchers and Increased Project Based Units in a Project or Building*

Description/Update of MTW Activity: HABC reserves the right to allocate up to 30% of its Tenant Based HCV funding for Project Based Vouchers. The HCV Administrative Plan was also modified to allow HABC to enter into Project-Based Voucher HAP contracts for greater than 25% of the units in a project/development regardless of the family or household type that will occupy the units provided that the household is eligible.

Units subsidized with project-based vouchers under this MTW initiative are placed under a HAP contract upon turnover.

Currently, due to limitations in funding, HABC allocates 13% of its Tenant Based HCV funds to Project Based Vouchers, but anticipates increasing this allocation by waiving the per-building and per-project cap on future projects.

Proposed Changes: None

Approval and Implementation: The right to allocate up to 30% of HABC's HCV funds to Project Based Vouchers was approved in FY 2006. The per-building and per-project cap waiver was approved in FY 2010.

Changes to metrics, baselines, and benchmarks: None

7. *“CLOSED” (See Section D(6C). Project-Based Transitional Housing (Leased Housing)*

8. *Unit Sizes*

Description/Update of MTW Activity: The HCV Administrative Plan was modified to require participating families to select a unit size consistent with and not greater than the unit size listed on their voucher. Exceptions to this rule may be granted at the discretion of HABC where the voucher holder can demonstrate that a good faith and exhaustive

effort has been made to find an appropriately sized unit or based on a reasonable accommodation request. This requirement has been modified to include current participants living in units where the unit size exceeds the voucher size.

At recertification, HABC will review with current participants the household composition and may require the family to move to the correct unit size. If the family chooses not to move, the payment standard will be adjusted to reflect the appropriate unit size.

There may be a potential delay of outcomes, due to the simultaneous implementation of the three-year recertification cycle with this MTW activity.

Proposed Changes: None

Approval and Implementation: 2010

Changes to metrics, baselines, and benchmarks: None

9. *The Bailey Long –Term Affordable Project-Based Voucher Contract*

Description/Update of MTW Activity: As part of its MTW program, the HABC established an initiative in 2010, referred to as the Bailey Long Term Affordable Project Based Voucher (“LTA PBV”) Program, to create long term affordable units for persons with disabilities in compliance with the Bailey Consent Decree.

The Bailey LTA PBV program combines features of the Project Based Voucher program – such as the ability of owners to obtain long-term financing from banks and other private equity sources – with the resident protections and long-term affordability features of the Public Housing program.

LTA units are subsidized through Bailey LTA PBV contracts with minimum forty (40) year terms entered into between HABC and eligible property owners. LTA property owners are required to adopt the LTA Admissions & Continued Occupancy Criteria (“LTA Criteria”). Residents of Bailey LTA PBV Program units will have rights and protections as set forth in the LTA Criteria and will enter into a lease with the project owner that is developed by HABC for the Bailey LTA PBV Program units, which incorporates the regulatory requirements for a public housing lease and grievance procedures. Bailey LTA PBV Program NED units are occupied by NEDs on HABC’s public housing waiting list. The Bailey LTA PBV Program UFAS units are occupied by families on HABC’s reasonable accommodation transfer waiting list and HABC’s public housing waiting list who need the features of the UFAS units.

HABC created a Housing Assistance Payment (HAP) contract that increased the term of the contract to 40 years, consistent with the long term affordability period; and set forth what public housing rights, privileges and benefits must be afforded the residents in Bailey LTA PBV Program units.

Proposed Changes: None

Approval and Implementation: 2010

Changes to metrics, baselines, and benchmarks: None.

10. *The HABC Long –Term Affordable Project-Based Voucher Contract*

Description/Update of MTW Activity: In FY 2014, HABC established the Long Term Affordable Project Based Program (“LTA-PB Program”). Under this Program, HABC created long term affordable project based units in addition to the long term affordable units created for persons with disabilities pursuant to the Bailey Consent Decree which HUD previously approved under HABC’s MTW Agreement.

The LTA-PB Units shall be managed and operated primarily in accordance with the HUD regulations governing public housing units (*e.g.*, 24 CFR Parts 5, 960, 966, and the like) (the “Public Housing Regulations”), even though the LTA-PB Units will be subsidized with project based voucher funds. The LTA-PB Units shall remain affordable for a minimum of forty (40) years. The LTA-PB Program will provide to applicants for, and residents of, the LTA-PB Units most of the rights, privileges, and benefits that are provided under the public housing regulations. LTA Project Based units are occupied by families on the public housing waiting list.

LTA-PB property owners are required to adopt the criteria for leasing and continued occupancy of the LTA-PB Units (“LTA Criteria”). HABC requires developers/owners of certain redeveloped public housing sites and/or certain project-based voucher sites to comply with the LTA Criteria.

Proposed Changes: None

Approval and Implementation: 2014

Changes to metrics, baselines, and benchmarks: None

11. *“CLOSED” (See Section D(4C) Utility Allowances for Families Living in Larger Units than Voucher Size (HCVP)*

Thompson Leased Housing Program

12. *Exception Payment Standards*

Description/Update of MTW Activity: Payment Standards for the Thompson mobility program will be set between 90 and 135 percent of the HUD published Fair Market Rent. The payment standard will be set using a consistent methodology that compares

the ratio of area median rent to the actual rent of the census tract. Implementation of exception payment standards is subject to funding availability.

Proposed Changes: As authorized by Section IV.G.2 of the *Thompson* Settlement Agreement, and Section D(2)(a) of the MTW Agreement, BRHP will change its Payment Standards for the Baltimore Housing Mobility Program *from* 90 up to 130 percent *to* 90 up to 135 percent of the HUD published FMR.

Approval and Implementation: 2007

Changes to metrics, baselines, and benchmarks: Although BRHP will change its Payment Standards for the Baltimore Housing Mobility Program from 90 up to 130 percent of the HUD published FMR to 90 up to 135 percent of the HUD published FMR; this will not result in changes to the metrics or baseline; however changes have been made to the benchmarks.

13. *Thompson Biennial Recertifications*

Description/Update of MTW Activity: Pursuant to HABC's MTW authority, families participating in the Baltimore Housing Mobility Program must have their household composition and income re-determined at least once every 25 months.

Proposed Changes: None

Approval and Implementation: Approved in FY 2006 Plan and Implemented in 2007

Changes to metrics, baselines, and benchmarks: The Baseline below is based on 1,246 participants and an average specialist salary of \$25.00 per hour. The revised Benchmark is based on 3,151 participants and an average specialist salary of \$25.25 per hour.

14. *Thompson Risk Based Inspections*

Description/Update of MTW Activity: Pursuant to HABC's MTW authority, units in the Baltimore Housing Mobility Program will have their units re-inspected at least once every 25 months. Owners and families are allowed to self-certify that non-emergency items identified as "fail" during an HQS inspection have been repaired. Only units located in the allowable (non-impacted) areas are eligible for this option. The fail items must be minor and determined to be non-emergency to be eligible for self-certification. The self-certification process will require the owner and tenant family to certify that the repairs have been made. A random sample of units that have been approved under the self-certification option will receive a quality control inspection.

Proposed Changes: None

Approval and Implementation: 2010

Changes to metrics, baselines, and benchmarks: None

15. *HAP Contract Modifications – Thompson Floating Units*

Description/Update of MTW Activity: The Special Administrative Plan was modified to reflect previously approved activities that have not yet been implemented related to the Project Based Voucher program. This initiative allows floating units instead of identifying specific units in the HAP contract in the Project Based Voucher program.

Proposed Changes: None

Approval and Implementation: Approved in 2009 and implemented in 2010.

Changes to metrics, baselines, and benchmarks: None

16. *Asset Income for Thompson Participants*

Description/Update of MTW Activity: HABC excludes all income from assets when the cash value of the asset is less than \$50,000. This initiative will reduce the time it takes to verify income. This rent simplification measure will increase efficiency without having any negative impact on increasing residents' rent.

Proposed Changes: None

Approval and Implementation: 2012

Changes to metrics, baselines, and benchmarks: None

17. *Adjusted Income for Thompson Participants*

Description/Update of MTW Activity: Pursuant to HABC's MTW authority, the gross annual income of participants in the Baltimore Housing Mobility Program shall be reduced using a standard deduction. There will be a standard deduction for working families, disabled families and non-disabled families without wages. The deductions are:

- \$3,200 for households with wages
- \$1,200 for households without wages
- \$400 for any elderly or disabled family (to be combined with either of the above deductions)

Proposed Changes: None

Approval and Implementation: 2012

Changes to metrics, baselines, and benchmarks: None

18. *Exclude Income from Full-Time Students and Adopted Household Members*

Description/Update of MTW Activity: The goal of this activity is to exclude all income from full time students and adoptive income sources because the program has adopted flat deductions, and most of the income from these sources is statutorily excluded, upon full implementation, zero (0) families will have any income, for the purposes of calculating the tenant rent, attributable to full time students and/or adoptive income.

As of January 15, 2015, there were 0 clients with adoptive income and 37 clients with full time student status that also had wages. The wages for seventeen (17) of the full time students was fully excluded. The remaining 20 clients will have the un-excluded portion (\$480) of their wages excluded at the time of their next biennial reexamination.

Proposed Changes: None

Approval and Implementation: 2014

Changes to metrics, baselines, and benchmarks: None

19. **“CLOSED” (See Section D(11C). Energy Conservation and Utility Allowances**
20. **“CLOSED” (See Section D(13C) Limit on Interim recertifications (Leased Housing)_**
21. **“NOT IMPLEMENTED” See Section B(II). Amendments to the Project-Based Voucher Contract (Leased Housing)**
22. **“CLOSED” See Section D(12C). The Front Door Program (Leased Housing)**
23. **“CLOSED” See Section D(7C). Encouraging Leasing in Higher Opportunity Neighborhoods (Thompson Leased Housing)**
24. **Sponsor-Based, Project-Based Transitional Housing (Leased Housing)**

Description of MTW Activity: The Transitional Housing Program will be modified to allow HABC to partner with the Women’s Housing Coalition and other organizations to provide permanent housing for up to twenty-five (25) homeless/hard-to-house families.

- All referred applications will be screened in accordance with HABC waiting list policies and eligibility criteria;
- HABC may create a special waiting list for the specific population.

HABC defines self-sufficiency as the ability to achieve economic independence, through employment that will allow individuals and/or families to become self-sufficient (not dependent on welfare assistance). Families will be able to achieve self-sufficiency through this program in the following areas:

- Obtaining a source of income;
- Participating in job training programs; and
- Securing permanent housing.

Voucher subsidies will be provided to the owner of the contract for all eligible participants. Program participants will be required to comply with all program rules and

guidelines. Failure to comply will result in the termination of assistance and program participation.

Proposed Changes: None

Approval and Implementation: 2017

Changes to metrics, baselines, and benchmarks: None

25. Security Deposit Assistance (Thompson Leased Housing Program)

Description of MTW Activity: As authorized in Section IV.B.5 of the *Thompson Settlement Agreement*, BRHP will use HAP funds for payment to landlords to cover a security deposit for Baltimore Housing Mobility Program participants leasing in a census tract designated “opportunity” by BRHP. Subject to funding availability, BRHP will offer each participant this Security Deposit Assistance on a one-time basis, and only if that participant has repaid the entire balance of any previously grant-funded Security Deposit Assistance Loan, and is otherwise in good standing with BRHP. The Security Deposit Assistance will not exceed the equivalent of one-month’s rent and BRHP will require a participant contribution towards the security deposit of between \$200 and \$500 dollars, which will be adjusted seasonally to encourage leasing in summer months.

Proposed Changes: None

Approval and Implementation: Approved 2017

Changes to Metrics, Baselines and Benchmarks: None

B. Not Yet Implemented

11. Project Based Voucher Amendments to the HAP Contract (Leased Housing)

Description/Update of MTW Activity: HUD regulations at 24 CFR 983.206 (b) provide that “a HAP contract may be amended during the three-year period immediately following the execution date of the HAP contract to add additional PBV contract units in the same building. An amendment to the HAP contract is subject to all PBV requirements (e.g., rents are reasonable), except that a new PBV request for proposals is not required. Using its MTW authority, HABC plans to waive this three-year restriction, which will allow HABC to amend the HAP contract at any time during the initial fifteen year term of the HAP contract and during any renewal term of the HAP contract. Under this proposal, HABC may exercise this option for all PBV units, including, but not limited to the Bailey LTA and PBV units and the non-Bailey LTA PB units.

Approved: FY 2015 Annual Plan

Update on Implementation: HABC anticipates that implementation of this activity will occur in FY 2017.

C. Activities on Hold

1H. Family Self Sufficiency (Public Housing)

Description of MTW Activity: HABC established a combined Public Housing and HCV Family Self Sufficiency program. Program requirements varied from the existing regulatory framework in the following ways:

- 1) Elimination of mandated thresholds for number of participants in the HCVP program and expansion of the program to include public housing residents;
- 2) Enhanced program design to target the populations in need;
- 3) A focus on outcomes that included homeownership and unsubsidized economic independence;
- 4) Modification of the maximum contract period from five (5) to four (4) years; and
- 5) Revised procedures/regulations regarding the release of the escrow funds.

Approved: FY 2006 Annual Plan

Placed on Hold: FY 2014

Status Update: The FSS program that required MTW authority was placed on hold in FY 2014. HABC has reverted back to the traditional FSS program, which it does not need MTW authority to implement. HABC may choose to reactivate this activity in the future, but at this time has no definitive plans for reactivation.

2H. MTW Homeownership Program – (Public Housing)

Description MTW Activity: Using its MTW flexibility, HABC submitted a revised Section 32 Homeownership Plan, which was approved by HUD in 2009. Under the Plan, HABC will identify and rehabilitate various vacant scattered sites properties for homeownership sale to eligible residents.

Proposed Changes: Stricter guidelines imposed by lenders have reduced the number of public housing participants who are eligible to purchase a home. In addition, many public housing residents experience barriers when trying to purchase a home such as a poor credit history, lack of job history and retention and being wary of leaving the public housing rental program.

Approval: FY 2009 Annual Plan

Placed on Hold: FY 2014

Status Update: This activity was placed on hold in FY 2014 as HABC works to revise the program policies. HABC may choose to reactivate this activity in the future, but at this time has no definitive plans for reactivation.

3H. *Section 811 Supportive Housing (Leased Housing)*

Description of MTW Activity: HABC proposed combining MTW funds with 811 funds to create units for non-elderly persons with disabilities pursuant to the Bailey Consent Decree. HABC intends to make these funds available through a competitive process and will require developers to demonstrate through specified documentation that the project has a gap that cannot otherwise be addressed.

Approved: FY 2009 Annual Plan

Placed on Hold: FY 2014

Status Update: This activity was placed on hold in FY 2014 due to a lack of interest from developers. HABC may choose to reactivate this activity in the future, but at this time has no definitive plans for reactivation.

4H. *Direct Homeownership Program (Thompson Vouchers)*

Description MTW Activity: The direct purchase second mortgage program is for applicants with incomes of no less than \$18,000 per year. Participants in this initiative do not receive a Section 8 homeownership voucher. A soft second mortgage of HOME VI funds is available through this program.

Approved: FY 2012 Annual Plan

Placed on Hold: FY 2014

Status Update: This activity was placed on hold in FY 2014 due to lack of participants.

D. Closed Out Activities

1C. *Adoption of New Investment Policies for HABC (Fiscal Operations)*

In FY 2013, HABC proposed adopting new investment policies thereby increasing investment revenue and decreasing the federal expenditures necessary to carry out the federal program. For example, if the investment revenue is increased by \$100,000 due to a more favorable investment rate of return, this increased revenue can be used to offset the OPEB liability. HABC decided not to implement this activity due to the terms of a General Depository Agreement with the State.

2C. *Payment Standards at the 50th Percentile (Leased Housing)*

This activity was approved in FY 2009. HUD has adjusted the area Fair Market Rent (FMR) to the 50th percentile for HABC; therefore MTW authority is no longer required and this activity was closed out in FY 2011.

3C. *TDC Limits (Public Housing)*

In FY 2009 HABC established a local Total Development Cost policy to acquire the 58 scattered site units under the Thompson Consent Decree. This activity was approved by HUD via a letter dated March 12, 2009. In January 2012 the last the scattered site unit was acquired and this activity has been closed out.

4C. *Utility Allowances for Families Living in Larger Units than Voucher Size (Leased Housing)*

This MTW activity was implemented in FY2012. Under the 2014 Appropriations Act the rule on utility allowances changed to require that PHAs match the utility allowance payment to the actual unit size and not the voucher size. Based upon the 2014 Appropriations Act language HABC no longer needs to designate this activity as MTW. In addition this MTW activity was approved in the FY 2010 Annual Plan, but has been incorporated into the FY 2015 unit size proposal.

5C. *Utility Allowances for Families Living in Larger Units than Voucher Size (Thompson Vouchers)*

This MTW activity was approved in the FY 2014 Annual Plan, but has been incorporated into the FY 2015 unit size proposal.

6C. *Project-Based or Transitional Housing (Leased Housing)*

This MTW activity was approved in the FY 2007-2008 Annual Plan. In 2014 the Collington House facility lost its eligibility to retain project-based vouchers and this program was closed out.

7C. *Encouraging Leasing in Higher Opportunity Neighborhoods (Thompson Vouchers)*

This MTW activity was planned for implementation in FY 2015. However, upon further consideration, BRHP decided not to implement this activity and it was closed out in FY2016.

8C. *Gilmor Self Sufficiency Initiative (Public Housing)*

Description MTW Activity: This activity simplified the rent policy for staff and residents; and encouraged employment, job retention, and wage progression.

Status Update: A shortage of funds to provide employment counseling forced the closure of this program in FY2015; however in FY 2017 HABC became the recipient of a \$2.5 million Jobs Plus grant that will provide employment counseling to public housing residents that otherwise could not be provided under MTW.

9C. *Rent Policy(Public Housing)*

Description of MTW Activity: HABC received HUD approval in FY 2012 to implement agency-wide the rent policy adopted for Gilmor Homes; however, due to lack of funding and the on-going revisions of the Gilmor Homes rent policies, this activity has been placed on hold in FY 2014.

Status Update: This activity was identical to the Gilmor Homes Demonstration Program and was implemented at the remaining HABC sites; however a shortage of funds to provide employment counseling forced the closure of this program in FY2015.

10C. *Journey Home (Leased Housing)*

Description/Update of MTW Activity: HABC would exercise its MTW fund flexibility in order to use MTW Block Grant Funds as housing subsidy for participants in the Journey Home Program.

Status Update: The Journey Home Program was closed in FY2016. There are no active participants whose housing assistance is funded by HABC.

11C. *Energy Conservation Utility Allowance*

Description of MTW Activity: HABC provides a utility allowance (“UA”) to households responsible for payment of utilities for water, electricity, gas, other heating, cooking fuels and sewage services. In an effort to reinforce energy conservation activities and reduce the cost of water/sewage utility allowances, HABC will encourage the completion of a water audit and use of low-flow toilets by HCV tenants and landlords/owners. HABC will conduct outreach to HCV landlords and tenants, where the household is responsible for payment of the water/sewer utility, to notify them of a locally funded opportunity to have a water audit conducted in their unit. Water audits will be conducted by the Department of Housing and Community Development, flow restrictors will be installed in the sink, the shower and water hook-up valves. Tenants will be provided with water conservation measures free of charge. Landlords/owners are required to repair any leaks identified during the water audit before the conservation efforts will be implemented.

Using its MTW authority, those HCV households that have participated in the water audit and had the flow restrictive devices installed will be eligible to have low-flow toilets purchased and installed, free of charge, by HABC. HABC will establish a conservation water/sewer UA for households who take part in and complete the water audit. HABC will apply the conservation water/sewer UA to the household at their first regular recertification after the conservation activities have been completed. Participation in the audit is not mandatory, however owners and tenants are incentivized to complete the audit to receive new toilets and reduce their water/sewer bills. Cost savings for this MTW initiative will be fully realized upon full reimbursement of the capital expenditure and upon adjustment of applicable UAs.

Baltimore City Tariff uses the latest approved tariff, including the Bay Restoration Fee to calculate the dollar amount of the unit price for water and sewer costs per unit size and corresponding average number of tenants for each unit. HABC contracted TA Engineering, Inc., which based the utility/water consumption on the findings of the American Water Works Association (AWWA) Research Foundation: “Residential End Uses of Water.” These resources determined the average consumption per household and multiplied it by the City’s tariff rate to get the dollar amount per 100 cubic feet (CCF). The average allowance for Baltimore City in 2013 was \$9.40/CCF. This increased by \$1.21 from 2012, when it was \$8.19/CCF. According to TA Engineering, Inc. there will be a probable reduction of 25-40% to the UA through these water conservation efforts. A

new contract will be established to revise UA tables based on HUD Form 52667 that was to be completed in FY2016, and include a separate line item specifically for the energy conservation allowances.

Status: This MTW activity was placed on "HOLD" IN FY 2014 due to comments from the public and subsequently "CLOSED" in FY 2016.

12C. *The Front Door Program (Leased Housing)*

Description/Update of MTW Activity: HABC partnered with the Mayor's Office of Human Services/Homeless Services Program, Sarah's Hope (a shelter for the homeless); and St. Vincent De Paul to provide MTW Block Grant funds to the Front Door Program to rapidly house 36 homeless families for up to one year using two distinct strategies. HABC will monitor each family's continuous occupancy for two-years after lease up.

Status Update: The contract ended December 31, 2014, six months into HABC's FY2015. The contract has not been renewed, and the activity is now closed.

13C. *Rent Increase Determinations (Leased Housing)*

Description/Update of MTW Activity: This activity will increase cost effectiveness in Federal expenditures by keeping program spending within budgetary limits. Suspending rent increase adjustments will keep HCV program spending within budgetary limits. Exceeding available funding will force HABC to withdraw assistance from a number of families causing a hardship for those families and property owners.

Status Update: This MTW activity is intended to keep spending within budgetary limits. As such it was closed out in FY2016.

14C. *Limit on Interim Recertifications (Leased Housing)*

Description/Update of MTW Activity: Currently HABC conducts regular recertifications on a biennial basis for all households with some exceptions, i.e. households with homeownership vouchers. HABC conducts regular recertifications every three (3) years for elderly and/or disabled households on fixed incomes. HABC existing policy on interim reexamination is such that households may report decreases in income/increases in unreimbursed expenses at any time (voluntary interim recertification) and HABC will, upon verification of the change, process an interim rent reduction. Conversely, households are required to report certain changes in household composition and increases in income (required interim recertifications). In such cases, HABC will process an interim rent increase three months from the date of the change or on the effective date of the recertification, whichever comes earlier.

Status Update: This activity was placed on hold in FY 2014 due to comments received from the public and closed out in FY2016.

15C. *Risk Based Inspections*

Description/Update of MTW Activity: HABC has implemented a Risk-Based inspection process in order to ensure that the highest housing quality standards are maintained and that HABC resources are utilized in an efficient and effective manner. Units, which have consistently met annual inspection standards, will be inspected every two (2) years. Units, which do not have such a track record, will be inspected annually. An HCVP Inspections Supervisor has been assigned to evaluate each failed inspection report with five or less violations to determine if those violations qualify as non-health/safety related. HABC uses the professional judgment of HCVP Inspection Managers and relies on HQS guidelines to determine when a property's condition poses a threat to the health and safety of HCVP participants. Cosmetic defects, minor defects, and normal wear and tear violations may be considered as non-health/safety related violations during the evaluation.

In the case of such items being deemed in a failed condition the landlord/owner will be notified of and directed to correct the defect within 30 calendar days of its discovery. The landlord must, within that 30 calendar day period, certify to this office in writing that the defect has been remedied. Certification must include the tenant's signature verifying that the violation has been corrected. HABC reserves the right to set and modify the inspection schedule for each unit. Special inspections may be scheduled at any time at HABC's discretion.

NOTE: Some minor cosmetic defects may be cause for health/safety violations (exposing walls, outlets, etc.) eliminating the possibility for owners to self-certify. In FY2017, HABC will continue to inform landlords about the benefits of participating in the self-certification program.

HABC conducted a pilot program in CY 2013 on Project-Based sites and implemented this initiative for the entire inventory in CY 2014. HABC began a campaign in FY 2015 informing landlords program-wide about the benefits of biennial inspections for units that consistently meet annual inspection standards.

V. MTW Sources and Uses of Funding

This section of the Annual Plan describes HABC's planned sources and uses of MTW Block Grant. Planned sources and uses for other HUD, other federal, State and Local funds and other Non-MTW funds are described in a separate attachment. This financial plan is compiled based on current information and is subject to revision as conditions and/or assumptions change.

A. Planned Sources and Uses of MTW Funds

HABC's Moving-to-Work (MTW) Block Grant includes three major funding sources:

- Low Income Public Housing (LIPH)
- Section 8 Housing Choice Voucher (HCV)
- Capital Fund Program (CFP) / Demolition or Disposition Transitional Funding (DDT), formerly known as the Replacement Housing Factor Fund (RHFF)

On December 24, 2013, HABC received HUD approval of a Portfolio Award under the Resident Assistance Demonstration (RAD) program covering 24 public housing sites for a total of more than 4,000 units. This Portfolio Award is HUD's commitment to reserve conversion authority for the identified units in the portfolio. The purpose of the award is to authorize conversion of public housing to PBRA under RAD. The conversion of units under RAD allows \$350 million of capital improvements to be completed at the selected housing sites.

As of February 2017, fourteen sites (Allendale, BE Mason, Bel Park, Brentwood, Chase, Ellerslie, Govans, Hollins House, Lakeview Towers, McCulloh extension, Primrose, Pleasant View Gardens Senior Building, Pleasant View Gardens Town Homes and Wyman House) totaling 2,670 units have successfully been converted to RAD. The FY 2018 MTW Plan as described below includes the assumption that 1,218 units will be converted to RAD during FY18.

(V) Sources and Uses of Funds

MTW PLAN

V.1.Plan.Sources and Uses of MTW Funds

A. MTW Plan: Sources and Uses of MTW Funds

Estimated Sources of MTW Funding for the Coming Fiscal Year

PHAs shall provide the estimated sources and amounts of MTW funding by FDS line item.

Sources

FDS Line Item	FDS Line Item Name	Dollar Amount
70500 (70300+70400)	Total Tenant Revenue	\$ 23,640,998
70600	HUD PHA Operating Grants	\$ 270,181,951
70610	Capital Grants	\$ 26,343,485
70700 (70710+70720+70730+70740+70750)	Total Fee Revenue	\$ 0
71100+72000	Interest Income	\$ 85,051
71600	Gain or Loss on Sale of Capital Assets	\$ 0
71200+71300+71310+71400+71500	Other Income	\$ 2,270,314
70000	Total Revenue	\$ 322,521,800

Notes to Sources:

1. Tenant Revenue is planned at a 97% occupancy rate. Total Tenant Revenue also includes estimated income billable from various tenant transactions such as warrant, court and maintenance costs anticipated during FY 2018.
2. HABC's Total Operating Grants of \$270,181,951 from HUD include the following funding estimates:
 - Section 8 HCV Housing Assistance Payments (HAP) subsidies in the amount of \$138,037,922 for Regular HABC Vouchers, including Port ins and \$54,373,339 for Thompson Partial Consent Decree and Remedial Vouchers.
 - Ongoing Administrative Fee Earned in the amount of \$12,292,543 (\$9,422,846 for Regular HABC Vouchers, \$2,869,697 for Partial Consent Decree and Remedial Vouchers) is calculated based on an estimated proration at 84%.
 - Public Housing Subsidies of \$65,478,147 is budgeted based on an estimated 90% funding proration for the fiscal year ending June 30, 2018.
 - Capital Fund soft costs in the amount of \$1,297,337 are estimated for administering the planned capital improvement and operating activities.
3. Capital Grants Hard Costs funding of \$26,343,485 is based on planned capital improvement and construction activities as described in the Capital Improvement Plan.
4. HABC does not report Fee Revenue as HABC has adopted a Local Asset Management Plan since FY 2010.
5. Until RAD transactions are completed, a gain or loss for disposal of capital assets is not estimated for the FY18 budget.
6. Other Income is related to vending machines, excess utilities, and lease income from the public housing program. It also includes Fraud Recovery for the recovery of funds from the Section 8 HCV program.

Estimated Uses of MTW Funding for the Coming Fiscal Year

PHAs shall provide the estimated uses and amounts of MTW spending by FDS line item.

Uses		
FDS Line Item	FDS Line Item Name	Dollar Amount
91000 (91100+91200+91400+91500+91600+91700+91800+91900)	Total Operating - Administrative	\$ 33,123,541
91300+91310+92000	Management Fee Expense	\$ 2,738,219
91810	Allocated Overhead	\$ (806,518)
92500 (92100+92200+92300+92400)	Total Tenant Services	\$ 1,854,386
93000 (93100+93600+93200+93300+93400+93800)	Total Utilities	\$ 17,987,623
93500+93700	Labor	\$ 0
94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	\$ 34,797,415
95000 (95100+95200+95300+95500)	Total Protective Services	\$ 325,608
96100 (96110+96120+96130+96140)	Total insurance Premiums	\$ 3,452,429
96000 (96200+96210+96300+96400+96500+96600+96800)	Total Other General Expenses	\$ 8,640,129
96700 (96710+96720+96730)	Total Interest Expense and Amortization Cost	\$ 3,621,323
97100+97200	Total Extraordinary Maintenance	\$ 668,000
97300+97350	Housing Assistance Payments + HAP Portability-In	\$ 197,849,583
97400	Depreciation Expense	\$23,500,000
97500+97600+97700+97800	All Other Expenses	\$ 908,263
90000	Total Expenses	\$328,660,001

HABC’s projected total MTW Uses of Funds are as follows:

Total Expenses	\$328,660,001
Less: Depreciation Expense	\$(23,500,000)
Capital Hard Cost	\$26,553,485
MTW Uses of Funds	\$331,713,486

Uses of Fund exceed Sources of Fund by \$9,191,686 which will be funded by MTW reserves.

Notes to Expense:

1. Administrative expenses include salaries and benefits for administrative, CFP/DDT programs staff and absorbing previously split salaries and benefits for City of Baltimore. Also included are salaries and benefits for Housing Management staff at the Asset Management Project (AMP) levels as well as program staffs for the Section 8 HCV program. In addition, this category also includes operating expenses such as office rent, telephone, computer materials and contracts, postage and supplies for all programs.
2. Management Fees expense includes fees for HABC’s Privately Managed Sites by outside management firms and fees to BRHP for the Mobility counseling program.
3. Allocated Overhead is calculated based on HUD’s approved Local Asset Management Program since FY 2010. The proposed updated cost allocation calculations for FY 2018 are included in Appendix C.
4. Tenant Services includes salaries, benefits, materials and supplies used to support tenant councils and the Resident Advisory Board, and to provide direct services to residents of public housing.
5. Utilities include expenses for water, electricity, gas, steam and fuel consumed by HABC’s AMPs. HABC continues to exercise prudent procurement actions to achieve favorable utility rates. Utility consumptions are adjusted based on addition or demolition activities planned for the fiscal year. In addition, applicable utility savings as a result of the Energy Performance Contract (EPC) has also been factored into the projected utility costs.
6. Ordinary Maintenance includes salaries and benefits of maintenance workers and crews assigned to public housing units. It also includes maintenance materials and maintenance contracts used for ordinary maintenance operations. This category also includes outside contract costs to privatized firms, which manage some of HABC’s public housing and affordable housing units.
7. Protective Services includes outside security contracts for the developments.
8. Insurance Premiums are budgeted for properties, general liability, worker’s compensation, automobiles, commercial crime, EDP data and media, boiler and machinery for the MTW activities.
9. Other General Expenses include compensated absences, collection losses for uncollected rent and Payment in Lieu of Taxes (PILOT).
10. Interest Expense is budgeted for interest associated with the EPC Debt Service.
11. Extraordinary Maintenance is planned for unforeseen break down of heating systems, boilers, chillers, etc. This line also includes Casualty Loss which are estimated for unforeseen repairs and losses at public housing units that are not covered by insurance carriers.

12. Housing Assistance Payments (HAPs) include rent subsidies paid to landlords and utility assistance paid to tenants under the Section 8 HCV program. Section 8 HCV HAP expenditures are budgeted in the amount of \$195,084,783 (\$143,111,444 for Regular HABC Vouchers-including Port ins, \$27,466,118 for Partial Consent Decree Vouchers and \$24,507,221 for Remedial Vouchers). The Plaintiffs of the Thompson Consent Decree have created a non-profit corporation, Baltimore Regional Housing Partnership (BRHP) to serve as Administrator beginning January 2013 and therefore, the HAP amount for Thompson consent decree and remedial vouchers in FY 2018 is reported as a pass-through from HABC to BRHP.
13. Depreciation Expense is estimated for the costs of tangible fixed assets allocated over their useful lives. Depreciation expense is based on HABC's fixed asset records and depreciation methods.

B. Single Fund Flexibility

The MTW Agreement allows HABC to combine public housing operating and capital funds including DDT provided under Section 9, and HCV's tenant-based voucher program funds provided under Section 8 of the 1937 Act into a single, authority-wide block grant funding source. HABC uses this combined funding source to carry out MTW program activities in support of MTW statutory objectives to achieve greater costs effectiveness and to increase housing choices for low-income families.

The following activities will take place in FY 2018 using single fund flexibility concept:

- HABC continues to use the prior year's MTW block grant reserve fund for renovation and development of UFAS units to meet the 504 accessibility requirements using single fund flexibility concept.
- Due to inadequate funding levels in FY 2017 of the Housing Choice Voucher Program (HCVP), HABC will use its MTW Single Fund Flexibility to fund and issue tenant-based vouchers to residents at O'Donnell Heights who must be relocated due to ground water penetration. HABC will issue the vouchers using Public Housing Operating Funds until HCVP funding levels are increased to fully cover the HAP expenses for the displaced residents.

V.2.Plan.Local Asset Management Plan

B. MTW Plan: Local Asset Management Plan

Is the PHA allocating costs within statute?

or

 No

Is the PHA implementing a local asset management plan (LAMP)?

 Yes

or

If the PHA is implementing a LAMP, it shall be described in an appendix every year beginning with the year it is proposed and approved. The narrative shall explain the deviations from existing HUD requirements and should be updated if any changes are made to the LAMP.

Has the PHA provided a LAMP in the appendix?

 Yes

or

HUD has approved HABC's Local Asset Management Program as part of the Annual Plan submission since FY 2010. The proposed updated cost allocation calculations for FY 2018 are included in Appendix C. The indirect cost rate for 2018 will be 14.28% for MTW and 13.59% for non-MTW.

C. The Rental Assistance Demonstration Program

In July 2014, the HUD released a revised version of the RAD Program. The Program allows public housing subsidy to be replaced with PBRA subsidy which can be combined with other resources such as LIHTC to raise needed capital for the renovation of public housing units. As such, the RAD Program will bring over \$350 million of new investment to HABC over a 3-year period. The majority of the renovation work will be focused on HABC's mixed population buildings throughout the city that serve the elderly and the non-elderly disabled.

Originally HABC submitted to HUD eleven applications and requested approval for a portfolio award to convert, under RAD, 22 public housing sites in HABC's inventory; however on February 12, 2015 HABC received HUD approval for an additional portfolio award to convert Broadway Overlook. Of the 23 sites now converting under RAD, 16 are mixed-population buildings, which house elderly and non-elderly disabled households. Two sites are designated for elderly-only households and the remaining are considered family public housing developments (conventional and privately managed). Since HABC's current inventory included 18 mixed-population sites, HABC plans to convert 98% (or 3,088 out of 3,147 units) of its mixed-population inventory to RAD. In FY 2018 HABC plans to move forward with converting the following public housing sites under the RAD Program:

1. Monument East
2. Somerset Court Extension
3. Rosemont Tower
4. J. Van Story Branch (West Twenty)
5. Hillside Park
6. Heritage Crossing
7. Townes at the Terraces
8. Arbor Oaks
9. Homes for Arundel

To maximize the RAD Program the public housing developments will be sold to private ownership entities in which an HABC affiliate will retain some ownership interest. HABC's development affiliate will retain control of the land under a ground lease with the private ownership entities. By statute the new owners are required to maintain the units for the same population and all current residents will have the choice to return to the same property upon completion of significant renovations, or remain in HABC's conventional public housing program. All future residents will come from HABC's public housing reasonable accommodation and applicant waiting lists.

Post -Conversion Changes in Policies that Govern Eligibility, Admission, Selection, And Occupancy of Units at the RAD Projects

The Housing Authority of Baltimore City (“HABC”) was a successful applicant in the Rental Assistance Demonstration (RAD) Program. When HABC converted to Project Based Rental Assistance (“PBRA”), HABC adopted certain of the resident rights set forth in Section 1.6 C and D, or Section 1.7 B and C, of the PIH Notice 2012-32, REV-1, which are the following:

- No existing residents will be rescreened upon conversion;
- The residents will have a right to return to an assisted unit at the renovated site in the event the resident must be temporarily relocated to facilitate rehabilitation of the site;
- Rent increase phase-in;
- Public Housing Family Self Sufficiency and Resident Opportunities and Self Sufficiency Service Coordinator programs for current participants;
- Resident Participation and Funding;
- Earned Income Disregard for existing resident already receiving this benefit; and
- Choice Mobility for conversion.

HABC used its MTW authority to obtain a waiver from HUD to apply its Long Term Affordable Criteria (the “LTA Criteria”) to the RAD units. The LTA Criteria addresses the following resident’s rights:

- Leasing RAD Units to applicants from HABC’s public housing waiting lists;
- Adopting some or all of the admissions and eligibility criteria in accordance with 24 CFR Part 960;
- Adopting some or all of the lease provisions that include terms required by HUD regulations governing the public housing program under 24 CFR 966.4, to include that landlords must automatically renew the leases of residents in LTA Units unless the landlord can show good cause for terminating the lease, and lease terminations;
- Adopting a grievance procedure similar to the procedure in HUD regulations governing public housing;
- Permitting residents in RAD Units who need a UFAS unit to transfer to a UFAS unit within HABC’s conventional public housing program or to other RAD sites;
- Setting rules regarding the payment of fees by applicants for LTA-PB Units that are generally consistent with the regulations governing fees required of public housing applicants, including application fees and security deposits; and
- Requiring the sites to adopt and follow HABC’s Reasonable Accommodation Policy and Operating Order.

A copy of the LTA Criteria setting forth these rights is attached here to as Appendix Q. Additionally, HABC is currently compliant with all fair housing and civil rights requirements and is under two (2) Voluntary Compliance Agreements; one In the Matter of Shanté Eley, and the other In the Matter of Felicia Allsup. HABC is also under a consent decree executed in *Rickie Bailey, et al v. HABC* (Civil Action No. JFM-02-CV-225) and *United States v. HABC* (Civil Action No. JFM-04-CV-03107).

The RAD statute was enacted to assist PHA’s in addressing its capital needs by providing HABC with access to private sources of capital to repair and preserve its affordable housing assets. Please

be aware that upon conversion, the Authority's Capital Fund Budget will be reduced by the pro rata share of Public Housing Developments converted as part of the Demonstration, and that the HABC may also borrow funds to address their capital needs. HABC currently has a debt under the Capital Fund Financing Program and will be working with the State of Maryland Housing and Community Development to address outstanding debts issues, which may result in additional reductions of capital funds.

Regardless of any funding changes that may occur as a result of conversion under RAD, HABC certifies that it will maintain its current service level for the remaining public housing inventory in order to ensure MTW Statutory requirement to serve substantially the same number of families is met.

VI. Administrative

Pursuant to Attachment B Section VI of HABC's MTW Agreement with the Department of Housing and Urban Development (HUD) the Fiscal Year 2018 MTW Annual Plan was made available for public review and comment for thirty (30) days beginning February 28, 2017, and ending on March 30, 2017. Copies of the FY 2018 Annual Plan were available at HABC's main offices, the Enoch Pratt Free Library and on the website at www.baltimorehousing.org. A public hearing was held on March 22, 2017 at 201 N. Aisquith Street, Baltimore MD 21202. ___ people attended the public meeting, and HABC reviewed and considered all comments that were received (See Appendix O). Signed copies of the Board Resolution signifying approval of the FY 2018 Annual Plan and the Certifications of Compliance with Regulations signifying the adoption of same are included as Appendix A.

HABC will continue to monitor and evaluate MTW activities during FY 2018. At this point, HABC does not intend to use external evaluators for new or ongoing MTW initiatives. Internal reports will be generated on a periodic basis to assess performance against proposed targets. Quarterly internal reviews are conducted with program staff and management to review and evaluate results and, if necessary, to modify proposed strategies to improve results. Annual evaluation results will be reported as appropriate by HABC in the MTW Annual Report.

This section of the Plan also provides a list of appendixes including materials required by HUD pursuant to the MTW Agreement and other information provided by HABC to inform HUD and the public of its MTW activities. The following is a list of appendixes:

Appendix A: Board Resolution and Certification of Compliance

Appendix B: Asset Management Table

Appendix C: FY 2018 Proposed Cost Allocation Methodology & Local Asset Management Plan

Appendix D: Certifications: HUD-50071 – Certification of Payments to Influence Federal Transactions

- SF-424 – Application for Federal Assistance
- HUD-52723 – Operating Fund Calculation of Operating Subsidy
- SF-LLL – Disclosure of Lobbying Activities

Appendix E: Summary of Proposed Changes to the Thompson Special Admin Plan

Appendix F: Summary of Proposed Changes to the HCV Administrative Plan

Appendix G: Matrix of ACOP, Lease and Grievance Changes

Appendix H: The Annual Statement/Performance and Evaluation Report

Appendix I: Private Management Portfolio

Appendix J: General Housing Information and MTW Sources & Uses

Appendix K: Office of Resident Services

Appendix L: Information Technology

Appendix M: Non-MTW Information

Appendix N: Amendments to the Annual Plan

Appendix O: Review of Comments Received and Subsequent Changes

Appendix P: The Public Process

Appendix Q: Gilmor Units for Demolition

Appendix R: LTA Criteria

Appendix S: Phase II RAD Information

Appendix A:
Board Resolution & Certification of Compliance

**A Resolution of the Board of Commissioners
Approving the Second Amendment to the
Moving to Work Annual Plan for Fiscal
Year FY 2018.**

PH-04-2018-10

HOUSING AUTHORITY OF BALTIMORE CITY

A Resolution of the Board of Commissioners Approving the Second Amendment to the Moving to Work Annual Plan for Fiscal Year 2018

WHEREAS, by letter dated December 27, 2017, the U.S. Department of Housing and Urban Development (“HUD”) approved the Fiscal Year 2018 Moving to Work Annual Plan (the “FY 2018 Annual Plan”) of the Housing Authority of Baltimore City (“HABC”), which was in accordance with the requirements of HABC’s Amended and Restated Moving to Work (“MTW”) Agreement, dated December 24, 2008; and

WHEREAS, by resolution dated November 16, 2017, the Board of Commissioners (the “Board”) approved a prior amendment to the FY 2018 Annual Plan to be submitted to the U.S. Department of Housing and Urban Development (“HUD”) concerning HABC’s application for a Choice Neighborhoods Initiative implementation grant; and

WHEREAS, HABC desires to submit a second amendment to the FY 2018 Annual Plan to set forth HABC’s intention to submit an application to HUD for the demolition of the six walk-up buildings at Gilmore Homes and to submit an application to HUD for the disposition for the vacant land that is the location of the former Somerset Homes development, which was demolished in 2009; and

WHEREAS, HABC published the notice of the Second Amendment on its website and in media outlets, and made the Second Amendment available for review and comment by HABC residents, the HABC Resident Advisory Board, other resident organizations, advocacy groups, and the general public (collectively, the “Community”); and

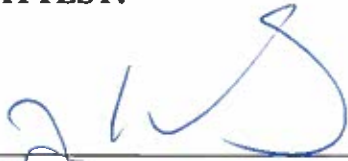
WHEREAS, on March 22, 2018, HABC held a public meeting to hear comments on the Second Amendment from the Community, and the thirty day comment period lasted for thirty days until would accept comments through for a thirty day comment period ended on March 28, 2018, and in accordance with the MTW Restated Agreement, HABC has considered all comments received.

NOW THEREFORE, BE IT RESOLVED BY the HABC Board of Commissioners, as follows:

1. The Second Amendment to the FY 2018 MTW Annual Plan is hereby approved, and the Executive Director is hereby authorized to submit the Second Amendment to HUD.
2. The Executive Director, or her designee, is hereby authorized to take any and all appropriate actions, and execute all appropriate documents necessary to carry out this Resolution consistent with its terms.

PASSED, ADOPTED AND APPROVED this 11th day of April, 2018.

ATTEST:



Janet Abrahams
Secretary/ Executive Director



Joseph Smith
Chairman

Approved as to form and legal sufficiency
this 2nd day of April, 2018 by:



Jan Goslee, General Counsel
HABC Office of Legal Affairs

Appendix B:
Asset Management Table

ASSET MANAGEMENT TABLE FY 2017

Appendix B

Community	AMP Nos.	Non-Dwelling Units	PIC Certified ACC Units in 2017	Other Units	Development Activities	Capital Improvement Activities	Demolition/Dispo Activities	Management
Latrobe Homes	1	0	669	0	None	See Capital Program. EPC implemented.	Potential removal of interior structures to reduce density and improve circulation	HABC
McCulloh Homes (Low-rise Units)	2	0	556	0	None	See Capital Program – Potential EPC site		HABC
Perkins Homes	3	0	629	0	Planning process has been initiated with the objective of redevelopment of the site.	See Capital Program – Potential EPC site		HABC
Poe Homes	4	1	288	0	None	See Capital Program. EPC implemented.		HABC Owned / Private Management
Douglass Homes	5	3	387	0	None	See Capital Program – Potential EPC site		HABC
Gilmor	6	6	548	0	Preliminary discussions involving redevelopment of this property to take place.	See Capital Program. EPC implemented	Potential removal of interior structures to reduce density and improve circulation	HABC
O'Donnell Heights	9	1	304	0	Phase 1A was completed in FY 2014. The financial closing for Phase 1B took place in November, 2016. Construction is underway. An additional 74 units are proposed for demolition based on the distressed condition of these specific buildings. A demolition application is being prepared to submit to HUD.		Disposition application submission for 7 homeownership units. A demolition application for 74 public housing units will be submitted this fiscal year. Condition of other properties will be monitored.	HABC
Somerset Homes	10	0	0	0	A joint RFP was issued by BDC and HABC to solicit a developer for the redevelopment of the Oldtown/Somerset property and a developer was selected in 2015. A tax credit application was submitted in the fall of 2016 and announcement of an award, if any, is expected in the first quarter of 2017.			HABC
Cherry Hill Homes	11	1	1281	0	Possible redevelopment of vacant land for mixed income/use development.	See Capital Program. EPC implemented.		HABC
Brooklyn Homes	21	1	482	0	None	See Capital Program. EPC implemented.		HABC
Westport Homes	22	0	200	0	None	See Capital Program - EPC implemented		HABC
Mount Winans	22	0	52	0	None	See Capital Program; Potential EPC site.		HABC
McCulloh Homes Ext. (HRise)	23	2	349	0	RAD Transaction closed in November 2016			Private Ownership, Private Management
Rosemont	31	1	106	0	None	See Capital Program; Potential EPC site.		HABC
Dukeland	31	0	30	0	None	See Capital Program; Potential EPC site.		HABC
Lakeview Tower and Lakeview Towers Ext.	52	0	0	0	RAD Transaction closed in November 2015			Private Ownership, Private Management
Van Story Branch, Sr., Apts.	41	0	357	0	Property approved for Phase 2 Rental Assistance Demonstration Program			HABC
Somerset Court Ext.	42	0	60	0	Property approved for Phase 2 Rental Assistance Demonstration Program			HABC

Community	AMP Nos.	Non-Dwelling Units	PIC Certified ACC Units in 2017	Other Units	Development Activities	Capital Improvement Activities	Demolition/Dispo Activities	Management
Monument East	43	0	170	0	Property approved for Phase 2 Rental Assistance Demonstration Program			HABC
Wyman House	44	0	0	0	RAD Transaction closed in December 2015			Private Ownership, Private Management
Chase House	46	0	189	0	RAD Transaction closed in December 2016			Private Ownership, Private Management
Govans Manor	47	0	191	0	RAD Transaction closed in November 2016			Private Ownership, Private Management
B. E. Mason, Sr., Apts.	51	0	0	0	RAD Transaction closed in November 2015			Private Ownership, Private Management
Ellerslie Apts.	53	0	117	0	RAD Transaction closed in February 2017			Private Ownership, Private Management
Bel-Park Tower	54	0	0	0	RAD Transaction closed in November 2015			Private Ownership, Private Management
The Brentwood	56	1	0	0	RAD Transaction closed in December 2015			Private Ownership, Private Management
Rosemont Towers	70	0	203	0	Property approved for Phase 2 Rental Assistance Demonstration Program			HABC
Primrose Place	71	0	0	0	RAD Transaction closed in February 2016			Private Ownership, Private Management
Hollins House	74	0	0	0	RAD Transaction closed in November 2015			Private Ownership, Private Management
Allendale	75	0	0	0	RAD Transaction closed in November 2015			Private Ownership, Private Management
Charles K. Anderson	73	0	0	0	Possible redevelopment of vacant land for mixed income/use development.			HABC
Arbor Oaks	101	0	62	150	Property approved for Phase 2 Rental Assistance Demonstration Program	See Capital Program		Private Ownership, Private Management
Monastery Gardens	102	0	11	26	Floater Units	See Capital Program		Private Ownership, Private Management
Midtown (Scattered Sites Units)	103	0	35	0		Capital improvement schedule from Replacement Reserves and other sources.		HABC
Montpelier	104	0	13	0		See Capital Program		HABC Owned/Private Management
Hillside Park	105	0	30	64	Property approved for Phase 2 Rental Assistance Demonstration Program	None		Private Ownership, Private Management
The Townes at The Terraces	106	1	203	100	Property approved for Phase 2 Rental Assistance Demonstration Program	See Capital Program		Private Ownership, Private Management
Terrace Senior Building	107	0	47	41	Property approved for Phase 2 Rental Assistance Demonstration Program	None		Private Ownership, Private Management

Community	AMP Nos.	Non-Dwelling Units	PIC Certified ACC Units in 2017	Other Units	Development Activities	Capital Improvement Activities	Demolition/Dispo Activities	Management
Uptown Apartments	108	0	37	0		Capital improvement schedule from Replacement Reserves and other sources.		HABC
Stricker Street (Scattered Sites Units)	109	0	25	0		Capital improvement schedule from Replacement Reserves and other sources.		HABC
Pleasant View Gardens	110	0	311	26	RAD Transaction closed in September 2016			Private Ownership, Private Management
Heritage Crossing	111	0	75	185	Property approved for Phase 2 Rental Assistance Demonstration Program	None		Private Ownership, Private Management
West Hills Square	113	0	11	98	98 Floater Units	None		Private Ownership, Private Management
Broadway Overlook	112	0	84	82	HOPE VI project that is complete and fully occupied; no further investment contemplated - Project is approved for Phase 2 Rental Assistance Demonstration Project.			Private Ownership, Private Management
St. Ambrose (Scattered Sites Units)	116	0	30	None		None		Private Ownership, Private Management
Reservoir Hill	117	0	40	24	24 Tax Credit Units	See Capital Program		Privately Owned/Private Management
Albemarle Square Phase I Rental	114	0	93	31	HOPE VI project is complete and fully occupied - 31 Tax Credit Units	None		Private Ownership, Private Management
Albemarle Square Phase II Rental	114	0	37	166	HOPE VI project is complete - 145 Homeownership and 21 Tax Credit Units			Private Ownership, Private Management
Orchard Ridge, Formerly Claremont Homes /	N/A	0	0	374	Rental Phase IV is completed. Rental Phase V is under construction. Homeownership Phase I and II are complete.		Phase 1, 2, 3, 4 and 5: mixed finance disposition.	Private Ownership/Private Management
Homes for Arundel (Scattered Sites/Thompson)	118	0	51	0	Property approved for Phase 2 Rental Assistance Demonstration Program	See Capital Program		Private Ownership/Private Management
Homes for Arundel (Scattered Sites/Thompson)	118A	0	7	0	Property approved for Phase 2 Rental Assistance Demonstration Program	None		Private Ownership/Private Management
Homes for Arundel (Scattered Sites/Thompson)	9-118	0	1	0	This unit is a homeownership unit that will be removed from inventory.	None		Homeownership Unit
Sharp-Leadenhall Scattered Sites	119	0	23	8	8 Tax Credit Units	None		Private Ownership/Private Management
Barclay Scattered Sites including Homewood House	121	0	53	176	Rental Phase II completed in 2014. Rental Phase III for 57 affordable units is under construction. Homeownership Phase II will include the rehabilitation of 12 homeownership units and is under construction.	None	Mixed finance disposition	Private Ownership/Private Management
Thompson 22	123	0	22		None	See Capital Program		HABC

Community	AMP Nos.	Non-Dwelling Units	PIC Certified ACC Units in 2017	Other Units	Development Activities	Capital Improvement Activities	Demolition/Dispo Activities	Management
Scattered Sites - Bailey UFAS Units	124	0	0	0	HABC hired design build contractors to construct 36 UFAS units in order to meet the obligations of the Bailey Consent Decree. To date, 34 of the 36 have been completed with an additional 2 to be completed by early 2017. HABC staff working with HUD to add units to Performance Information Center (PIC) data base.			HABC
Scattered Sites	200	0	215	None	Substantial rehabilitation of long-term vacant units for rental and homeownership. Exploring redevelopment options such as Rental Assistance Demonstration Programs. All scattered site AMPS to be considered in Phase 2 of the Rental Demonstration Program. HABC staff continues to work with HUD to reconcile scattered site PIC data.	See Capital Program; Potential EPC site.	Planned disposition of approx. 300 units in FY 2017/ FY 2018. All scattered site AMPS may be affected by the disposition activity.	HABC
Scattered Sites Units	201	0	197	None	See Amp 200	See Capital Program; Potential EPC site.	See Amp 200	HABC
Scattered Sites (includes Albert Spencer, Carey House)	202	0	272	None	See Amp 200	See Capital Program; Potential EPC site.	See Amp 200	HABC
Scattered Sites (Includes Oswego Mall)	203	0	371	None	See Amp 200	See Capital Program; Potential EPC site.	See Amp 200	HABC
Albermale Square Phase III Rental	204	0	4	None	HOPE VI project is complete-2 Lease purchase units	None		Private-Ownership/Private-Management-HABC
Barrister Court Apt.		0	0	32	None	Capital improvement schedule from Replacement Reserves and other sources.		HABC Owned / Private Management
Indecco		0	0	45	None	Capital improvement schedule from Replacement Reserves and other sources.		HABC Owned / Private Management
Norman Lohn House		0	0	12	None	Capital improvement schedule from Replacement Reserves and other sources.		HABC Owned / Private Management
Somerset Chase		0	0	22	None	Capital improvement schedule from Replacement Reserves and other sources.		HABC Owned / Private Management
Maxwell III		0	0	20	None	Capital improvement schedule from Replacement Reserves and other sources.		HABC Owned / Private Management
Irvington Place		0	0	41	None	Capital improvement schedule from Replacement Reserves and other sources.		HABC Owned / Private Management
West Lexington Street		0	0	44	None	Capital improvement schedule from Replacement Reserves and other sources.		HABC Owned / Private Management
Hollander Ridge				110	HFA was selected as the developer to acquire and rehab up to 110 scattered sites to serve as replacements for the Hollander Ridge and O'Donnell Heights units. This project is approved for Phase 2 Rental Assistance Demonstration Program.			TBD

Community	AMP Nos.	Non-Dwelling Units	PIC Certified ACC Units in 2017	Other Units	Development Activities	Capital Improvement Activities	Demolition/Dispo Activities	Management
TOTALS	Total	18	9,528	1,767				

**Appendix C:
Cost Allocation Methodology & Local Asset
Management Plan**

Housing Authority of Baltimore City
Local Asset Management Program and Approach to Cost Allocation

Background

The First Amendment to the Moving to Work (MTW) Agreement allows the Housing Authority of Baltimore City (HABC) to develop a local asset management program that describes HABC's cost accounting system. It allows an alternative approach to cost allocation differing from the Operating Fund Rule (OFR) approach under 24 CFR Part 990. Instead of the prescribed fee for service approach as per the OFR, HABC has established a cost allocation methodology based on a single indirect cost rate developed in accordance with OMB Circular A-87. The deviations from HUD's OFR, the cost allocation plan along with the indirect cost rate are described below.

Description of How HABC is Implementing Asset Management

This plan is consistent with HABC's ongoing implementation of project based management, budgeting, accounting and financial management. Day to day operations of HABC sites are coordinated and overseen by Property Managers, who oversee the following management and maintenance tasks: tenant selection and leasing; rent collections; maintenance work order response; unit turnover; security; resident and community relations; capital improvements planning; and, other activities to efficiently operate the site. HABC Property Managers receive support in conducting these project-level activities from the entire array of Central Office departments.

HABC Property Managers develop and monitor property budgets with support from the HABC Finance staff. Budget trainings are held annually to support the budget development process.

HABC will continue to develop and utilize project-based budgets for all of its asset management projects (AMPs). All direct costs will be directly charged to the maximum extent possible to the AMPs. HABC housing managers will continue to receive AMP-based revenue and expense statements monthly, which include surplus and/or deficit, budgeted cost and actual cost, as they have for several years. HABC proposes to allocate indirect costs to the AMPs based on available housing units. Consistent with the Financial Data Schedule (FDS) approved line item, the indirect costs will be reported under "Allocated Overhead".

In designing and implementing its local asset management plan, HABC has used HUD's asset management requirements including AMP-based financial statements as a starting point. HABC will retain the HUD chart of accounts and the HUD crosswalk to the FDS. Under the local asset management program, HABC intends to retain full authority to move its MTW funds and project cash flow among projects without limitation.

HABC will continue to monitor the performance of all AMPs both operationally and financially. There will continue to be AMP-based operations and operating income and

expense financial reporting, that will be provided to and used by AMP housing managers monthly. Properties that are not meeting HABC standards, either operationally or financially will be expected to develop and adhere to an asset management plan, in order to effectuate improved and satisfactory operations.

Deviations from HUD's Operating Fund Rule

Balance Sheet Accounts

Some balance sheet accounts will be reported in compliance with HUD's Asset Management Requirements and some will deviate from HUD's requirements as discussed below.

1. Balance Sheet Accounts in compliance with HUD's Asset Management Requirements

The following account categories and types will comply with HUD's Asset Management Requirements. These account balances that have been defined as attributable to a specific AMP or program other than public housing will continue to be reported under the attributed AMP or the specific program.

- Restricted Cash Balances
- Petty Cash Balances
- Tenant Accounts Receivable and Payable balances, including Security Deposit Liabilities
- Miscellaneous Accounts Receivable
- Fixed Assets and Accumulated Depreciation
- Notes Receivable
- Contract Retention
- Invested in Net Fixed Assets

2. Balance Sheet Accounts that deviate from HUD's Asset Management Requirements

The balance sheet accounts that will deviate from HUD's Asset Management Requirements are listed as follows.

- Cash and Investments
- Interfund Accounts Receivable or Payable
- Prepaid Expenses and Deferred Charges
- Materials Inventory
- Accounts Payable and Accrued Liabilities
- Payroll Liabilities
- Compensated Absences
- Remaining Other Post-Employment Benefits (OPEB) Liability
- Unrestricted and Restricted Net Assets

HABC proposes to deviate from HUD's asset management requirements by reporting the above account balances as assets maintained centrally. They will not be reported by AMPs or programs. Through years of practice, we believe that maintaining these accounts centrally has proven to be the most cost effective and least labor intensive method. Although these balance sheet accounts are proposed to be maintained centrally, the related expenses will continue to be reported as an expense to the appropriate program, department, or AMP-based as applicable. Therefore, the applicable transactions do not distort the AMP-based income and expense statements. It is important to note that maintaining the above balance sheet accounts centrally, will it no way diminish HABC's obligations or ability to effectuate improved and satisfactory operations and to develop and adhere to its asset management plan. Also, these centrally maintained balance sheet accounts are consistent with the financial reporting under the new Catalog of Federal Domestic Assistance (CFDA) number for the MTW program.

Income Statement Deviations

HABC will not be utilizing the fee for service approach. Thus, there will be no Central Office Cost Center (COCC) created or reported in the annual FDS. No property management or asset management or bookkeeping fees will be charged to the AMPs. Rather, the allocated expenses will be charged into the AMPs based on the indirect cost rate developed and presented herein.

HABC's cost allocation methodology below, along with a preliminary indirect cost rate, applies to both the MTW program and non-MTW programs. This cost allocation plan and process will take the place of the fee for service cost and revenue approach developed within the new operating fund rule under 24 CFR Part 990.

1. Cost Allocation Approach

Consistent with the CFR part 200 cost principles, HABC has identified and segregated all its costs into a direct cost pool and an indirect cost pool. The basic principle to determine whether costs should be treated as direct or indirect is whether the cost can be directly attributed to one program or to multiple programs. Those costs that can generally be attributed to supporting one program are included as direct. Included in the direct pool are:

- All public housing development (or AMP) site direct costs
- All central frontline costs (both operating and capital), including Resident Services, Work Orders, Leasing, Legal, and the like
- All Central Maintenance crews, whose work will be direct cost to the maximum extent;
- All HCVP department expenses;

- All Modernization and Development expenses;
- All City direct costs;
- All partnership housing program.

The above direct cost services have been carefully reviewed and found to support specific unique programs, whether it be public housing, Section 8, or direct City programs.

Those costs that cannot be easily attributed to supporting one program are treated as indirect costs under the indirect cost pool. Indirect costs include:

- Most central office departments, including Executive, Finance, Human Resources, Information Technology, and the like;

The above indirect cost services have been carefully reviewed and found to support multiple programs, and as such must be treated as indirect, and allocated out in proportion to the direct services they support.

The worksheet used to identify direct and indirect costs and to develop the anticipated indirect rate is attached to this narrative as **Attachment A**.

The specific approach is as follows:

- Identify the direct cost base (D) and our indirect cost pool (I);
- Separate them out MTW and non-MTW;
- Develop two indirect cost rates (I/D), one for MTW and one for non-MTW, which are used to allocate indirect costs to the direct programs;
- Excluded from the direct cost base are all hard costs (capital), and
- HAP payments to landlords.

All costs used in this analysis are from the HABC Fiscal Year 2017 Approved Consolidated Budget. Based on this budget and the attached schedules, **the indirect cost rate is currently 14.28% for MTW and 13.59% for non-MTW (see Attachment A)**.

How does this cost allocation plan get implemented?

- All indirect costs will be identified and assigned into a pool;
- These costs are then charged out using the indirect cost rate to the MTW program and the respective non-MTW programs based on actual direct costs; thus, if in FY 2018, total MTW direct costs are \$100 million, then \$14.28 million (14.28%) of indirect costs would be charged out; similarly, if in FY 2018 there were \$10 million of direct non-MTW costs, then \$1.359 million (13.59%) will be charged in indirect costs.
- Annually, HABC will review the need to update its indirect cost rate using then current fiscal year budgets. It is believed, based on a review of several years of direct and indirect costs, that HABC's basic cost structure (direct

versus indirect, central office versus direct program service, etc.) is highly uniform and consistent. Notwithstanding this, HABC will revisit this analysis annually.

HABC intends to fully justify its indirect cost rate and will ensure that the annual independent audit will include a test of the HABC indirect costs rate's reasonableness.

The benefits of this cost approach include administrative simplicity, which should allow for increased efficiency and transparency; a greater ease of planning and budgeting on the part of direct program service providers, and a clearer understanding of indirect costs as a share of total costs at the HABC. As discussed above, it does not diminish HABC's obligations to effectuate improved and satisfactory operations and to develop and adhere to an asset management plan. It is also consistent with the financial reporting under the new Catalog of Federal Domestic Assistance (CFDA) number from OMB that HUD created for the MTW program.

HABC FY18 Indirect Cost Rate Explanation, a component of HABC's Local Asset Management Plan

This cost allocation plan and process for Fiscal 2018 represents year eight of HABC's local asset management plan allowed and approved as a component of its MTW participation.

Cost Allocation Approach

This indirect rate calculation is modeled directly on the past few years' methodology. Consistent with the OMB Circular A-87 cost principles, HABC has identified and segregated all its costs into a direct cost pool and an indirect cost pool. The basic principle to determine whether costs should be treated as direct or indirect is whether the cost can be directly attributed to one program or to multiple programs. Those costs that can generally be attributed to supporting one program are included as direct. Included in the direct pool are:

- All public housing development (or AMP) site direct costs;
- All central frontline costs (both operating and capital), including Resident Services, Work Orders, Leasing, Legal, and the like;
- All Central Maintenance crews, whose work will be direct costed to the maximum extent;
- All HCVP department expenses;
- All Modernization and Development expenses;
- All City direct expenses;
- All partnership housing program direct expenses.

The above direct cost services have been carefully reviewed and found to support specific unique programs, whether it be public housing, Section 8, or direct City programs.

Those costs that cannot be easily attributed to supporting one program are treated as indirect costs under the indirect cost pool. Indirect costs include:

- Most central office departments, including Executive, Finance, Human Resources, Information Technology, and the like;

The above indirect cost services have been carefully reviewed and found to support multiple programs, and as such must be treated as indirect, and allocated out in proportion to the direct services they support.

The worksheet used to identify direct and indirect costs and to develop the anticipated indirect rate is attached to this narrative as **Attachment A**.

The specific approach is as follows:

- Identify the direct cost base (D) and our indirect cost pool (I);
- Separate them out MTW and non-MTW;
- Develop two indirect cost rates (I/D), one for MTW and one for non-MTW, which are used to allocate indirect costs to the direct programs;
- Excluded from the direct cost base are all hard costs (capital), and HAP payments to landlords.

All costs used in this analysis are from the HABC Fiscal Year 2016 Approved Consolidated Budget. Based on this budget and the attached schedule, **the indirect cost rate for FY2018 will be 14.28% for MTW and 13.59% for non-MTW (see Attachment A for detail).**

Appendix D Certifications

- **HUD-50071 – Certification of Payments to Influence Federal Transactions**
- **SF-424 – Application for Federal Assistance**
- **HUD-52723 – Operating Fund Calculation of Operating Subsidy**
- **SF-LLL – Disclosure of Lobbying Activities**

**Operating Fund
Calculation of Operating Subsidy
PHA-Owned Rental Housing**

**U.S. Department of Housing and
Urban Development
Office of Public and Indian Housing**

OMB Approval No. 2577-0029 (exp 06/30/2017)

Public Reporting Burden for this collection of information is estimated to average .75 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. This agency may not collect this information, and you are not required to complete this form, unless it displays a currently valid OMB control number. This information is required by Section 9(a) of the U.S. Housing Act of 1937, as amended, and by 24 CFR Part 990 HUD regulations. HUD makes payments for the operation and maintenance of low-income housing projects to PHAs/projects. The Operating Fund determines the amount of operating subsidy to be paid to PHAs/projects. PHAs/projects provide information on the Project Expense Level (PEL), Utilities Expense Level (UEL), Other Formula Expenses (Add-ons) and Formula Income – the major Operating Fund components. HUD reviews the information to determine each PHA's/project's Formula Amount and the funds to be obligated for the Funding Period to each PHA/project based on the appropriation by Congress. HUD also uses the information as the basis for requesting annual appropriations from Congress. Responses to the collection of information are required to obtain a benefit. The information requested does not lend itself to confidentiality. Formula Amount and the funds to be obligated for the Funding Period to each PHA/project based on the appropriation by Congress. HUD also uses the information as the basis for requesting annual appropriations from Congress. Responses to the collection of information are required to obtain a benefit. The information requested does not lend itself to confidentiality.

Enter Total Number of ACC Units for this PHA > > 669

1. Name and Address of Public Housing Agency: Housing Authority Of Baltimore City 417 E FAYETTE Street BALTIMORE, MD, 21202-3431		2. Funding Period: 01/01/2017 to 12/31/2017 3. Type of Submission: <input checked="" type="checkbox"/> Original <input type="checkbox"/> Revision No.
4. ACC Number: P-110	5. Fiscal Year End: <input type="checkbox"/> 12/31 <input type="checkbox"/> 03/31 <input checked="" type="checkbox"/> 06/30 <input type="checkbox"/> 09/30	6. Operating Fund Project Number: MD002000001
HUD Use Only		
7. DUNS Number: 035653435	8. ROFO Code: 0306	

Section 2

Calculation of ACC Units for 12-month period from July 1 to June 30 that is prior to the first day of the Funding Period:				
	ACC Units on 7/1/2015	Units Added to ACC (+)	Units Deleted from ACC (-)	ACC Units on 6/30/2016 (=)
Requested by PHA	0	0	0	0
HUD Modifications				

Line No.	Category	Column A Unit Months		Column B Eligible Unit Months (EUMs)		Column C Resident Participation Unit Months	
		Req'd by PHA	HUD Mod.	Req'd by PHA	HUD Mod.	Req'd by PHA	HUD Mod.

Categorization of Unit Months:	<input checked="" type="checkbox"/> First of Month
Occupied Unit Months	<input type="checkbox"/> Last of Month

01	Occupied dwelling units -- by public housing eligible family under lease			0		0	
02	Occupied dwelling units -- by PHA employee, police officer, or other security personnel who is not otherwise eligible for public housing			0		0	
03	New units -- eligible to receive subsidy during the Funding Period but not included on Lines 01, 02, or 05-13 of this section			0		0	
04	New units -- eligible to receive subsidy from 10/1 to 12/31 of previous funding period but not included on previous Calculation of Operating Subsidy			0		0	

Vacant Unit Months							
05	Units undergoing modernization			0			
06	Special use units			0			
06a	Units on Line 02 that are occupied by police officers and that also qualify as special use units						
07	Units vacant due to litigation			0			
08	Units vacant due to disasters			0			
09	Units vacant due to casualty losses			0			
10	Units vacant due to changing market conditions			0			
11	Units vacant and not categorized above						

Other ACC Unit Months							
12	Units eligible for asset repositioning fee and still on ACC (occupied or vacant)						
13	All other ACC units not categorized above						

Calculations Based on Unit Months:			
14	Limited vacancies		0
15	Total Unit Months	0	0
16	Units eligible for funding for resident participation activities (Line 15C divided by 12)		0

Special Provision for Calculation of Utilities Expense Level:			
17	Unit months for which actual consumption is included on Line 01 of form HUD-52722 and that were removed from Lines 01 through 11, above, because of removal from inventory, including eligibility for the asset repositioning fee		

Section 3

Line No.	Description	Requested by PHA	HUD Modifications
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Part A. Formula Expenses

Project Expense Level (PEL)

01	PUM project expense level (PEL)	\$468.15	
02	Inflation factor	1.01900	
03	PUM inflated PEL (Part A, Line 01 times Line 02)	\$477.04	
04	PEL (Part A, Line 03 times Section 2, Line 15, Column B)	\$0	

Utilities Expense Level (UEL)

05	PUM utilities expense level (UEL) (from Line 26 of form HUD-52722)		
06	UEL (Part A, Line 05 times Section 2, Line 15, Column B)	\$0	

Add-Ons

07	Self-sufficiency		
08	Energy loan amortization		
09	Payment in lieu of taxes (PILOT)		
10	Cost of independent audit		
11	Funding for resident participation activities	\$0	
12	Asset management fee <input type="checkbox"/> Eligible for an Asset Management Fee	\$0	
13	Information technology fee	\$0	
14	Asset repositioning fee		
15	Costs attributable to changes in federal law, regulation, or economy		
16	Total Add-Ons (Sum of Part A, Lines 07 through 15)	\$0	
17	Total Formula Expenses (Part A, Line 04 plus Line 06 plus Line 16)	\$0	

Part B. Formula Income

01	PUM formula income <input type="checkbox"/> Resident-paid utilities incentive	\$277.26	
02	Resident Paid Utility (RPU) Energy Performance Contract (EPC) Benefit		
03	PUM adjusted formula income (Sum of Part B, Lines 01 and 02)	\$277.26	
04	Total Formula Income (Part B, Line 03 times Section 2, Line 15, Column B)	\$0	

Part C. Other Formula Provisions

01	Moving-to-Work (MTW)	\$74,813,770	
02	Transition funding	0.00	\$0
03	Other		
04	Total Other Formula Provisions (Sum of Part C, Lines 01 through 03)	\$74,813,770	

Part D. Calculation of Formula Amount

01	Formula calculation (Part A, Line 17 minus Part B, Line 04 plus Part C, Line 04)	\$74,813,770	
02	Cost of independent audit (Same as Part A, Line 10)	\$0	
03	Formula amount (Greater of Part D, Lines 01 or 02)	\$74,813,770	

Part E. Calculation of Operating Subsidy (HUD Use Only)

01	Formula amount (Same as Part D, Line 03)		
02	Adjustment due to availability of funds		
03	HUD discretionary adjustments		
04	Funds Obligated for Period (Part E, Line 01 minus Line 02 minus Line 03) Appropriation symbol(s):		

Section 4

Remarks (provide section, part and line numbers):

Section 5

- In accordance with 24 CFR 990.215, I hereby certify that Housing Authority Of Baltimore City Housing Agency is in compliance with the annual income reexamination requirements and that rents and utility allowance calculations have been or will be adjusted in accordance with current HUD requirements and regulations.
- In accordance with 24 CFR 990.255 through 990.285 of Subpart H – Asset Management, I hereby certify that Housing Authority Of Baltimore City has less than 250 units and is in compliance with asset management. I understand in accordance with 24 CFR 990.190(f), PHAs that are not in compliance with asset management will forfeit the asset management fee.
- In accordance with 24 CFR 990.255 through 990.285 of Subpart H – Asset Management, I hereby certify that Housing Authority Of Baltimore City has 250 units or more and is in compliance with asset management. I understand in accordance with 24 CFR 990.190(f), PHAs that are not in compliance with asset management will forfeit the asset management fee.
- I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

Signature of Authorized PHA Representative & Date:



X

Signature of Authorized HUD Representative & Date:

X

MTW Add-On - Section 3, Part C, Line 1

Part A - Project Expense Level Funding

Line 1	Calendar Year 2016 Project Expense Level	45,436,338	
Line 2	Inflation Factor	1.018	
Line 4	Calendar Year 2017 Project Expense Level Funding		46,254,192

Part A - Utility Expense Level Funding

	Calendar Year 2016 Utilities Expense Level	50,502,873	
	Inflation Factor	0.9299	
Line 6	Calendar Year 2017 Utilities Expense Level Funding		46,962,622

Total MTW Add-On Prior to RAD Reductions

93,216,814

RAD Reductions

AMP #	AMP	Closing Date	Units	
MD002000075	ALLENDALE	11/6/2015	164	
MD002000051	BE MASON	11/13/2015	223	
MD002000054	BEL PARK	11/20/2015	253	
MD002000074	HOLLINS HOUSE	11/30/2015	130	
MD002000033	LAKEVIEW TOWERS	11/20/2015	301	
MD002000044	WYMAN HOUSE	12/11/2015	168	
MD002000056	BRENTWOOD	12/18/2015	150	
MD002000071	PRIMROSE	2/5/2016	125	
MD002000110	PVG-TOWNHOMES	7/28/2016	201	
MD002000110	PVG-SENIOR	9/9/2016	110	
MD002000023	MCCULLOH	11/18/2016	347	
MD002000047	GOVANS	11/30/2016	191	
	Total CHAP Units		2,363	
	Total CHAP Unit Months		28,356	
	Calendar Year 2017 Contract Rent Per Unit		649	
	Calendar Year 2017 RAD Reductions			(18,403,044)

Total MTW Add-On - Section 3, Part C, Line 1

74,813,770

OCAF Calculation

Beginning Contract Rent per unit	609	64,339,842
2014 Operating Cost Adjustment Factor (OCAF) Rate	1.017	67,332,393
Calendar Year 2015 Contract Rent per Unit	619	
2015 Operating Cost Adjustment Factor (OCAF) Rate	1.021	
Calendar Year 2016 Contract Rent Per Unit	632	
2016 Operating Cost Adjustment Factor (OCAF) Rate	1.027	
Calendar Year 2017 Contract Rent Per Unit	649	

Certification of Payments to Influence Federal Transactions

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing

Applicant Name

HOUSING AUTHORITY OF BALTIMORE CITY

Program/Activity Receiving Federal Grant Funding

LOW RENT PUBLIC HOUSING

The undersigned certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, Disclosure Form to Report Lobbying, in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all sub recipients shall certify and disclose accordingly.

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by Section 1352, Title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. **Warning:** HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

Name of Authorized Official

MICHAEL BRAVERMAN

Title

ACTING EXECUTIVE DIRECTOR

Signature



Date (mm/dd/yyyy)

2/23/2017

Application for Federal Assistance SF-424

* 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	* 2. Type of Application: <input type="checkbox"/> New <input checked="" type="checkbox"/> Continuation <input type="checkbox"/> Revision	* If Revision, select appropriate letter(s): <input type="text"/> * Other (Specify): <input type="text"/>
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* 3. Date Received: <input type="text"/>	4. Applicant Identifier: <input type="text"/>
--	---

5a. Federal Entity Identifier: <input type="text" value="MD002"/>	5b. Federal Award Identifier: <input type="text" value="MD002"/>
---	--

State Use Only:

6. Date Received by State: <input type="text"/>	7. State Application Identifier: <input type="text" value="MD7th"/>
--	--

8. APPLICANT INFORMATION:

* a. Legal Name: HOUSING AUTHORITY OF BALTIMORE CITY	
* b. Employer/Taxpayer Identification Number (EIN/TIN): <input type="text" value="52-6001394"/>	* c. Organizational DUNS: <input type="text" value="0356534350000"/>

d. Address:

* Street1:	417 EAST FAYETTE STREET
Street2:	<input type="text"/>
* City:	BALTIMORE
County/Parish:	<input type="text"/>
* State:	MD: Maryland
Province:	<input type="text"/>
* Country:	USA: UNITED STATES
* Zip / Postal Code:	21202-3416

e. Organizational Unit:

Department Name: <input type="text"/>	Division Name: <input type="text"/>
---	---

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

Prefix: <input type="text"/>	* First Name: SIEGLINDE
Middle Name: <input type="text"/>	
* Last Name: CHAMBLISS	
Suffix: <input type="text"/>	
Title: CHIEF FINANCIAL OFFICER	
Organizational Affiliation: <input type="text"/>	
* Telephone Number: 410-396-8303	Fax Number: 410-361-9479
* Email: SIEGLINDE.CHAMBLISS@HABC.ORG	

Application for Federal Assistance SF-424

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

L: Public/Indian Housing Authority

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

*** Other (specify):**

*** 10. Name of Federal Agency:**

US DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

11. Catalog of Federal Domestic Assistance Number:

14.850

CFDA Title:

LOW RENT PUBLIC HOUSING

*** 12. Funding Opportunity Number:**

9999

*** Title:**

9999

13. Competition Identification Number:

9999

Title:

9999

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

CITY OF BALTIMORE, MARYLAND

Add Attachment

Delete Attachment

View Attachment

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

PUBLIC HOUSING PROJECT ADMINISTRATION AND MAINTENANCE UNDER THE OPERATING FUND PROGRAM (24CFR990)

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a. Applicant

* b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

17. Proposed Project:

* a. Start Date

* b. End Date:

18. Estimated Funding (\$):

* a. Federal	<input type="text" value="93,216,814.00"/>
* b. Applicant	<input type="text" value="0.00"/>
* c. State	<input type="text" value="0.00"/>
* d. Local	<input type="text" value="0.00"/>
* e. Other	<input type="text" value="0.00"/>
* f. Program Income	<input type="text" value="0.00"/>
* g. TOTAL	<input type="text" value="93,216,814.00"/>

*** 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
- 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 in attachment.)**

- Yes
- No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

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: * First Name:
Middle Name:
* Last Name:
Suffix:

* Title:

* Telephone Number: Fax Number:

* Email:

* Signature of Authorized Representative: 

* Date Signed:

Appendix E:
Summary of Proposed Changes to the Thompson
Special Administrative Plan

APPENDIX E
Baltimore Regional Housing Partnership
 Summary of Thompson Administrative Plan Changes and Recommendations
 For Fiscal Year 2018

Page	Topic	Summary of Change	Type of Change¹
Cover		Updated Plan Dates	Non-Substantive
Table of Contents		Updated Table of Contents	Non-Substantive
Pages 6 and 7	Payment standards	Adopts flexibility authorized by HOTMA to not apply payment standard reductions to families who are under contract at the time of the reduction	Substantive
Pages 18-19	Screening policy	Added further detail regarding existing screening policies	Non-Substantive
Page 22	Subsidy standards	Clarified existing policy regarding voucher size assignments	Non-Substantive
Page 25	Tolling time	Removed language about not applying tolling time to align with current BRHP policy	Non-Substantive
Page 28	Lease contents	Added language requiring lease include certain information to match existing BRHP policy	Non-Substantive
Page 33	Family composition changes	Provides additional ways families can demonstrate familial relationships	Non-Substantive
Page 34	Family break up	Adds language indicating that BRHP reviews, on a case by case basis, transfer of vouchers to adult family members	Substantive
Page 37	Program termination	Adds bullet clarifying topic	Non-Substantive
Page 38	Unauthorized guests	Includes additional information about ways BRHP may demonstrate a family has unauthorized guests	Non-Substantive

¹ Changes that are “Substantive” typically require explanation to interest groups, including the Resident Advisory Board (RAB) at HABC. Changes that require MTW approval are also included in an MTW plan and is subject to review and approval by HUD. “Non-Substantive” changes are typically clarifying statements, grammar corrections, or other editorial changes that do not change the currently approved policy.

APPENDIX E
Baltimore Regional Housing Partnership
 Summary of Thompson Administrative Plan Changes and Recommendations
 For Fiscal Year 2018

Pages 39-40, 42	Inspections timeframes	Clarifies current policy regarding number of days landlords have to correct violations	Non-Substantive
Page 44	Project Based Assistance	Replaces chapter on Project Based Assistance to include regulatory detail on program guidelines	Substantive
Page 44	Regional Project Based Voucher program	Includes information regarding BRHP's participation in the Regional Project Based Voucher program	Substantive
Page 53	Informal Hearing	Clarifies documents that will be relied upon at hearing	Non-Substantive
Appendix A	Revised List of Approved Census Tracts and Payment Standards	Updated list of opportunity areas by census tract and payment standard	Substantive ²

² MTW approval is not required, as the payment standard policy was previously approved and is currently in effect. The FY 2018 changes adjust the policy based upon more recent data and policy priorities.

Appendix F:
Summary of Proposed Changes to
The Housing Choice Voucher Administrative Plan

Housing Authority of Baltimore City
Housing Choice Voucher Program

FY2018 Annual Plan | HCVP Administrative Plan Amendments

FY2017 HCVP Admin Plan CURRENT POLICY	Page #	FY2018 HCVP Admin Plan AMENDMENTS PROPOSED POLICY
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Chapter 1: Statement of Policies and Objectives

<p><u>1.3 GOALS (PREVIOUS SECTION B.)</u></p> <p>1.3.3 Strategic Goal: Ensure Equal Opportunity in Housing for All Americans</p> <ul style="list-style-type: none"> • Undertake affirmative measures to ensure access to assisted housing regardless of race, color, religion, national origin, sex, familial status, marital status, and disability; 	1-2	<p>Updating policy to match ACOP:</p> <ul style="list-style-type: none"> • Undertake affirmative measures to ensure access to assisted housing regardless of race, color, religion, national origin, sex, familial status, <i>sexual orientation, gender identity, marital status</i>, and/or disability;
<p><u>1.8 FAIR HOUSING POLICY (PREVIOUS SECTION G.)</u></p> <p>It is the policy of the Housing Authority to comply fully with all Federal, State, and local nondiscrimination laws and with the rules and regulations governing Fair Housing and Equal Opportunity in housing and employment.</p> <p>The HABC shall not deny any family or individual the equal opportunity to apply for or receive assistance under the Housing Choice Voucher Programs on the basis of race, color, sex, religion, national origin, ancestry, age, familial status, marital status, handicap or disability or sexual orientation.</p> <p>To further its commitment to full compliance with applicable Civil Rights laws, the HABC will provide Federal/State/local information to Voucher holders regarding unlawful discrimination in housing and the recourse available to families who believe they are victims of such discrimination. Such information will be made available during the family briefing session, and all applicable Fair Housing Information and Discrimination Complaint Forms will be made a part of the Voucher holder's briefing packet and available upon request at the front desk.</p>	1-4 To 1-5	<p>Updating policy to match ACOP:</p> <p>1.8 FAIR HOUSING POLICY</p> <p>It is the policy of <i>HABC</i> to comply fully with all Federal, State, and local nondiscrimination laws and with the rules and regulations governing fair housing and equal opportunity in housing and employment.</p> <p>HABC shall not deny any family or individual the equal opportunity to apply for or receive assistance under the Housing Choice Voucher Program on the basis of race, color, sex, religion, national origin, ancestry, age, familial status, marital status, handicap or disability, sexual orientation, or <i>gender identity</i>:</p> <ul style="list-style-type: none"> ❖ <i>Deny any family or individual the equal opportunity to apply for or receive assistance under the Housing Choice Voucher Programs;</i> ❖ <i>Deny any family the opportunity to apply for assistance, or deny any qualified applicant the opportunity to apply receive assistance suitable to their needs;</i> ❖ <i>Provide assistance that is different from that provided to others;</i> ❖ <i>Subject a person to segregation or disparate treatment;</i> ❖ <i>Restrict a person's access to any benefit enjoyed by others in connection with the Housing Choice Voucher Program;</i> ❖ <i>Treat a person differently in determining eligibility or other requirements for admission; or</i> ❖ <i>Deny any person access to the same level of services.</i>

FY2017 HCVP Admin Plan CURRENT POLICY	Page #	FY2018 HCVP Admin Plan AMENDMENTS PROPOSED POLICY
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Chapter 1: Statement of Policies and Objectives (Continued from previous section)

<p><u>1.8 FAIR HOUSING CONTINUED</u></p> <p>Housing Authority staff will be required to attend fair housing training and be informed of the importance of affirmatively furthering fair housing and providing equal opportunity to all families, including providing reasonable accommodations to persons with disabilities, as a part of the overall commitment to quality customer service. Fair Housing posters are posted throughout the Housing Authority office/s, including in the lobby and interview rooms and the equal opportunity logo will be used on all outreach materials. Appropriate staff will attend local “fair housing” update training programs sponsored by HUD and local organizations to keep current with new developments.</p> <p>Except as otherwise provided in 24 CFR 8.21(c)(1), 8.24(a), 8.25, and 8.31, no individual with disabilities shall be denied the benefits of, be excluded from participation in, or otherwise be subjected to discrimination because the HABC facilities are inaccessible to or unusable by persons with disabilities. Posters and housing information are displayed in locations throughout the HABC office in such a manner as to be easily readable from a wheelchair.</p> <p>The HABC office is accessible to persons with disabilities. Telephonic accessibility for the hearing impaired is provided through the Maryland Relay System. HABC provides sign language interpreters for meetings when requested as a reasonable accommodation.</p>	<p>1-5</p>	<p>To further its commitment to full compliance with applicable Civil Rights laws, HABC will provide Federal, State, and local information to voucher holders regarding unlawful discrimination in housing and the recourse available to families who believe they are victims of such discrimination. Such information will be made available during the family briefing session. In addition, fair housing information and discrimination complaint forms will be made a part of the voucher holder's briefing packet and available upon request at the front desk <i>HABC's Office located at 1225 West Pratt Street, Baltimore, MD 21223 and by HABC's Fair Housing & Equal Opportunity Office located at 417 E. Fayette Street, Baltimore, MD 21202, (410) 396-4247.</i></p> <p>HABC staff will be required to attend fair housing training, and be informed of which will include the importance of affirmatively furthering fair housing and providing equal opportunity to all families, including providing reasonable accommodations to persons with disabilities, as a part of the overall commitment to quality customer service. <i>Appropriate staff will attend local fair housing training update programs sponsored by HABC, HUD and local organizations to keep current with new developments.</i></p> <p>Fair Housing posters are posted throughout HABC offices, including in the lobby and interview rooms, in such a manner as being easily readable from a wheelchair. And the The equal opportunity logo will be used on all outreach materials. Appropriate staff will attend local “fair housing” update training programs sponsored by HUD and local organizations to keep current with new developments.</p> <p>Except as otherwise provided in 24 CFR §§ 8.21(c)(1), 8.24(a), 8.25, and 8.31, no individual with disabilities shall be denied the benefits of, be excluded from participation in, or otherwise be subjected to discrimination because HABC facilities are inaccessible to or unusable by persons with disabilities. Posters and housing information are displayed in locations throughout the HABC office in such a manner as to be easily readable from a wheelchair.</p> <p>HABC offices are accessible to persons with disabilities. Accessibility for the hearing impaired is provided through the Maryland Relay System. HABC provides sign language interpreters for meetings when requested as a reasonable accommodation.</p> <p><i>HABC's Fair Housing and Equal Opportunity Office (“FH&EO Office”) is responsible for monitoring HABC's compliance with, and enforcing the requirements of the fair housing laws and HABC's fair housing policy as set forth in this Administrative Plan.</i></p>
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FY2017 HCVP Admin Plan CURRENT POLICY	Page #	FY2018 HCVP Admin Plan AMENDMENTS PROPOSED POLICY
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Chapter 1: Statement of Policies and Objectives (Continued)

<p><u>No current section</u></p>	<p>1-6</p>	<p>Adding new section to Chapter 1:</p> <p><i>1.9 VICTIMS OF DOMESTIC VIOLENCE, DATING VIOLENCE, SEXUAL ASSAULT AND/OR STALKING</i></p> <p><i>The purpose of this policy is to implement applicable revisions of the Violence Against Women Act of 2005 and the Violence Against Women Reauthorization Act of 2013 (collectively “VAWA”), and to set forth HABC’s policies regarding domestic violence, dating violence, sexual assault and stalking. Notwithstanding VAWA’s title, this policy is gender-neutral.</i></p> <p><i>1.9.1. Assistance to VAWA Victims</i></p> <p><i>No applicant to HABC’s HCV Program who has been a victim of domestic violence, dating violence, sexual assault, or stalking shall be denied admission into the program if they are otherwise qualified.</i></p> <p><i>1.9.2. VAWA Provisions on Termination of Assistance to Victims</i></p> <p><i>VAWA provides that “no person may deny assistance, tenancy, or occupancy rights to housing assisted under a covered housing program to a tenant solely on the basis of criminal activity directly relating to domestic violence, dating violence, sexual assault, or stalking that is engaged in by a member of the household, of the tenant, or any guest or person under the control of the tenant, if the tenant or an affiliated individual of the tenant is the victim or threatened victim of such domestic violence, dating violence, sexual assault or stalking.”</i></p> <p><i>HABC may exercise its authority to “bifurcate a lease for the housing in order to evict, remove, or terminate assistance to any individual who is a tenant or lawful occupant of the housing and who engages in criminal activity directly relating to domestic violence, dating violence, sexual assault, or stalking against an affiliated individual or other individual, without evicting, removing, terminating assistance to, or otherwise penalizing a victim of such criminal activity who is also a tenant or lawful occupant of the housing.”</i></p> <p><i>VAWA does not limit HABC’s authority to terminate the assistance of any participant if HABC “can demonstrate that an actual and imminent threat to other tenants or individuals employed at or providing service to the property would be present if the assistance is not terminated or the tenant is not evicted.”</i></p> <p><i>1.9.3. Victim Documentation</i></p> <p><i>HABC will require an individual to submit documentation affirming any claim for which a participant family is facing termination of assistance because of the actions of a participant’s household member, or other person under the participant’s control who claims that he or she is the victim of actions that are related to domestic violence, dating violence, and sexual assault or stalking.</i></p>
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FY2017 HCVP Admin Plan CURRENT POLICY	Page #	FY2018 HCVP Admin Plan AMENDMENTS PROPOSED POLICY
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Chapter 1: Statement of Policies and Objectives (Continued from previous section)

<p><u>No current section CONTINUED FROM PREVIOUS PAGE</u></p>	<p>1-6</p>	<p><i>HABC will accept one of three methods for certification of a claim under VAWA:</i></p> <ul style="list-style-type: none"> ▪ <i>A completed HUD Form 50066, which HABC will make available to a participant family upon request; and/or</i> ▪ <i>A Federal, State, tribal, local police or other law enforcement, or court record; and/or</i> ▪ <i>Documentation signed and attested to by an employee, agent, or volunteer of a victim service provider, attorney, a medical professional, or a mental health professional, from whom the victim has sought assistance in addressing domestic violence, dating violence, sexual assault or stalking, or the effects of abuse, in which the professional attests under penalty of perjury to the professional's belief that the incident(s) in question are bona fide incidents of abuse, and the victim of domestic violence, dating violence, sexual assault or stalking has signed or attested to the documentation.</i> <p><i>The required certification and supporting documentation must be submitted to HABC within fourteen (14) business days after HABC issues a written request for the documentation. The 14-day deadline may be extended at HABC's discretion. If the individual does not provide the required certification and supporting documentation within the 14 business days, or by the end of the approved extension period, HABC may proceed with termination of assistance.</i></p> <p><i>For participants that have not yet been terminated, but HABC can demonstrate an actual and imminent threat to other participants, residents, or employees at or providing service to, the property, HABC will bypass the standard process and proceed with the immediate termination of the family's assistance.</i></p> <p style="text-align: center;"><i>1.9.4. Terminating Assistance of a VAWA Offender</i></p> <p><i>Although VAWA provides termination protection for victims of domestic violence, dating violence, sexual assault and/or stalking, it does not provide protection for offenders. HABC may exercise its explicit authority to "evict, remove, or terminate assistance to any individual who is a tenant or lawful occupant of the housing and who engages in criminal activity directly relating to domestic violence, dating violence, sexual assault or stalking against an affiliated individual or other individual without evicting, removing, terminating assistance to, or otherwise penalizing a victim of such criminal activity who is also a tenant or lawful occupant of housing."</i></p> <p><i>This authority supersedes any local, state, or other federal law to the contrary. However, if HABC chooses to exercise this authority, HABC will follow any procedures prescribed by HUD or by applicable local, state, or federal law regarding termination of assistance.</i></p>
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FY2017 HCVP Admin Plan CURRENT POLICY	Page #	FY2018 HCVP Admin Plan AMENDMENTS PROPOSED POLICY
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Chapter 1: Statement of Policies and Objectives (Continued from previous section)

<p><u>No current section CONTINUED FROM PREVIOUS PAGE</u></p>	<p>1-6</p>	<p><i>When the actions of a participant or other family member result in a decision to terminate the family's assistance and another family member claims that the actions involve criminal acts of physical violence against family members or others, HABC will request that the victim submit the required certification and supporting documentation in accordance with the stated timeframe. If the certification and supporting documentation are submitted within the required timeframe, or any approved extension period, HABC will terminate only the offender's assistance or require the household remove the offender from the lease and HAP Contract. If the victim does not provide the certification and supporting documentation, as required, HABC will proceed with termination of the family's assistance.</i></p> <p><i>For participants that have not yet been terminated, but HABC can demonstrate an actual and imminent threat to other participants, residents, or employees at or providing service to, the property, HABC will bypass the standard process and proceed with the immediate termination of the family's assistance.</i></p> <p>1.9.5. Confidentiality Requirements <i>All information provided to HABC regarding domestic violence, dating violence, sexual assault or stalking, including the fact that an individual is a victim of such violence or stalking, must be retained in confidence and may neither be entered into any shared database nor provided to any related entity, except to the extent that the disclosure (a) is requested or consented to by the individual in writing, (b) is required for use in an eviction proceeding, or (c) is otherwise required by applicable law. HABC will maintain information regarding domestic violence, dating violence, sexual assault or stalking in a sealed envelope in the participant's file.</i></p> <p>1.9.6. VAWA Definitions <i>The following definitions, which are related to VAWA, can be found in the definitions section of this Administrative Plan:</i></p> <ul style="list-style-type: none"> ▪ <i>Domestic Violence</i> ▪ <i>Dating Violence</i> ▪ <i>Sexual Assault</i> ▪ <i>Stalking</i> ▪ <i>Affiliated Individual</i>
<p><u>1.10 REASONABLE ACCOMMODATIONS POLICY (PREVIOUS SECTION H)</u></p> <p>It is the policy of the HABC to be service-directed in the administration of our housing programs, and to exercise and demonstrate a high level of professionalism while providing housing services to families.</p>	<p>1-6 To 1-7</p>	<p>Updated to match ACOP:</p> <p>It is the policy of the HABC to be service directed in the administration of our housing programs, and to exercise and demonstrate a high level of professionalism while providing housing services to families.</p>

FY2017 HCVP Admin Plan CURRENT POLICY	Page #	FY2018 HCVP Admin Plan AMENDMENTS PROPOSED POLICY
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Chapter 1: Statement of Policies and Objectives (Continued from previous section)

<p>The HABC policies and practices have adopted a reasonable accommodation policy and procedures so that persons with disabilities may fully access and utilize the housing program and related services. Written information regarding this policy and the procedures for making a request for a reasonable accommodation is available at the Housing Admissions Office, Public Housing Management Offices, the HABC Central Office, and the HABC website at www.baltimorehousing.org/index/ps_section8.asp. This policy is intended to afford persons with disabilities an equal opportunity to obtain the same result, to gain the same benefit, or to reach the same level of achievement as those who do not have disabilities. Situations in which this policy applies include, but are not limited to, when a family initiates contact with the HABC, when the HABC initiates contact with a family including when a family applies, and when the HABC schedules or reschedules appointments of any kind.</p> <p>To be eligible for a reasonable accommodation, a person must have a disability, which is defined as follows:</p> <ul style="list-style-type: none"> <input type="checkbox"/> A physical or mental impairment that substantially limits one or more of the major life activities of an individual; <input type="checkbox"/> A record of such impairment; or <input type="checkbox"/> Being regarded as having such impairment. <p><i>Note: This is not the same as the HUD definition used for purposes of determining allowances.</i></p> <p>A person requesting an accommodation due to a disability should submit a Request for Reasonable Accommodation Form (the Request Form). The Request Form will be available in an alternative format to accommodate those needing such a format in order to submit the request. HABC will acknowledge receipt of the request within twenty (20) business days of receiving the request and, using the Request for Information or Verification Form, submit to the requestor a list of any additional information and documentation needed in order to make a decision regarding the request. HABC will make a decision on the request within thirty (30) business days after receiving all needed information and documentation from the requestor. The decision will be communicated in writing or, if required because of the requestor's disability, in an alternative format. If HABC will be unable to make a decision within thirty (30) business days, it will advise the requestor in writing with the reason(s) for the delay.</p>	<p>1-6 To 1-7</p>	<p>The HABC policies and practices have adopted a reasonable accommodation policy and procedures so that persons with disabilities may fully access and utilize the housing program and related services. As set forth in HABC's Reasonable Accommodations Policy and Procedures, HABC is committed to ensuring that it's policies and practices do not deny individuals with disabilities the opportunity to participate in, or benefit from, nor otherwise discriminate against individuals with disabilities in connection with the operation of HABC's housing services or programs, solely on the basis of such disabilities. Therefore, if an individual with a disability requires an accommodation, such as an accessible feature or modification to HABC policy, HABC will provide such accommodation, unless doing so would result in a fundamental alteration in the nature of the program or an undue financial or administrative burden.</p> <p>Written information regarding this policy and the procedures for making a request for a reasonable accommodation is available at the Housing Admissions Office-HCVP Customer Relations Center, Public Housing Management Offices, the HABC's Central Office, HABC's Fair Housing and Equal Opportunity Office, and the HABC website at www.baltimorehousing.org/index/ps_section8.asp. This policy is intended to afford persons with disabilities an equal opportunity to obtain the same result, to gain the same benefit, or to reach the same level of achievement as those who do not have disabilities. Situations in which this policy applies include, but are not limited to, when a family initiates contact with the HABC, when the HABC initiates contact with a family including when a family applies, and when the HABC schedules or reschedules appointments of any kind. To be eligible for a reasonable accommodation, a person must have a disability, which is defined as follows:</p> <ul style="list-style-type: none"> <input type="checkbox"/> A physical or mental impairment that substantially limits one or more of the major life activities of an individual; <input type="checkbox"/> A record of such impairment; or <input type="checkbox"/> Being regarded as having such impairment. <p><i>Note: This is not the same as the HUD definition used for purposes of determining allowances.</i></p> <p>A person requesting an accommodation due to a disability should submit a Request for Reasonable Accommodation Form (the Request Form). The Request Form will be available in an alternative format to accommodate those needing such a format in order to submit the request. HABC will acknowledge receipt of the request within twenty (20) business days of receiving the request and, using the Request for Information or Verification Form, submit to the requestor a list of any additional information and documentation needed in order to make a decision regarding the request. HABC will make a decision on the request within thirty (30) business days after receiving all needed information and documentation from the requestor.</p>
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FY2017 HCVP Admin Plan CURRENT POLICY	Page #	FY2018 HCVP Admin Plan AMENDMENTS PROPOSED POLICY
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Chapter 1: Statement of Policies and Objectives (Continued from previous section)

<p><u>1.10 REASONABLE ACCOMMODATIONS POLICY (PREVIOUS SECTION H)</u></p> <p>...</p> <p>If the requestor disagrees with HABC decision, the requestor may contact the Fair Housing & Equal Opportunity Enforcement Office, 504 Coordination Division, at 417 E. Fayette Street, Suite 1305, Baltimore, MD 21202 (443) 984-1792 or one of the following agencies:</p> <p>...</p> <p>Reasonable accommodation will be made for persons with a disability that requires an advocate or accessible offices. A designee will be allowed to provide some information, but only with the permission of the person with the disability.</p> <p>All HABC mailings will be made available in an accessible format upon request, as a reasonable accommodation.</p>	1-7	<p>The decision will be communicated in writing or, if required because of the requestor's disability, in an alternative format. If HABC will be unable to make a decision within thirty (30) business days, it will advise the requestor in writing with the reason(s) for the delay....</p> <p>Reasonable accommodations will be made for persons with a disability that <i>who</i> requires an advocate or accessible offices. A designee will be allowed to provide some <i>some</i> information <i>on behalf of the person with the disability</i>, but only with the permission of the person with the disability. <i>Permission is required by HABC in the form of a notarized statement, or through oral verification when applicable, or through a Power of Attorney as approved by HABC's Office of Legal Affairs, verifying permission of the person with a disability.</i></p> <p>All HABC mailings will be made available in an accessible format upon request, as a reasonable accommodation.</p> <p><i>The definitions of the terms "individual with a disability," as defined by Section 504, and "person with disabilities," as defined by the ADA, are set forth in the glossary to this Administrative Plan.</i></p>
<p><u>1.10 REASONABLE ACCOMMODATIONS POLICY (PREVIOUS SECTION H)</u></p> <p>1.10.1 Verification of Disability</p> <p>HABC may verify a requestor's disability only to the extent necessary to ensure that the requestor is qualified for the housing for which he or she had applied, is qualified for deductions used in determining adjusted income, is entitled to preferences that have been claimed, and that the requested accommodation is needed. HABC will not require applicants to provide access to confidential medical records in order to verify a disability and will not require specific details about the disability. HABC may require documentation of the manifestation of the disability that causes a specific need for a specific accommodation or accessible unit.</p>	1-7	<p>Update to match ACOP:</p> <p>HABC may verify a requestor's disability only to the extent necessary to ensure that the requestor is qualified for the housing for which he or she had applied, is qualified for deductions used in determining adjusted income, is entitled to preferences that have been claimed, and that the requested accommodation is needed <i>to address, or because of, a disability</i>. HABC will not require applicants' persons <i>requesting a reasonable accommodation</i> to provide access to confidential medical records in order to verify a disability and will not require specific details about the disability. HABC may require documentation of the manifestation of the disability that causes a specific need for a specific accommodation or accessible unit.</p>

FY2017 HCVP Admin Plan CURRENT POLICY	Page #	FY2018 HCVP Admin Plan AMENDMENTS PROPOSED POLICY
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Chapter 1: Statement of Policies and Objectives (Continued from previous section)

<p><u>1.10 REASONABLE ACCOMMODATIONS POLICY (PREVIOUS SECTION H)</u></p> <p>1.10.3 Applying for Admission ... The application is completed at the eligibility appointment in the applicant's own handwriting, unless assistance is needed, or a request for accommodation is requested by a person with a disability. HABC staff will interview Applicants in order to review the information on the application form. Verification of disability as it relates to 504, Fair Housing, or ADA reasonable accommodation will be requested at this time. The application will also include questions asking all applicants whether reasonable accommodations are necessary.</p>	1-7 To 1-8	Update to match ACOP: ... The application is completed at the eligibility appointment in the applicant's own handwriting, unless assistance is needed, or a request for accommodation is requested by a person with a disability. HABC staff will interview Applicants in order to review the information on the application form. Verification of disability as it relates to 504, Fair Housing, or <i>the Americans with Disabilities Act (ADA)</i> reasonable accommodation will be requested at this time. The application will also include questions asking all applicants whether reasonable accommodations are necessary.
<p><u>1.11 TRANSLATION OF DOCUMENTS (PREVIOUS SECTION I)</u></p> <p>In determining whether it is feasible to provide translation of documents written in English into other languages, the HABC will consider the following factors:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Number of applicants and participants in the jurisdiction who do not speak English and speak the other language. <input type="checkbox"/> Estimated cost to HABC per client of translation of English written documents into the other language. <input type="checkbox"/> The availability of local organizations to provide translation services to non-English speaking families. <input type="checkbox"/> The availability of bilingual staff that can provide translation for non-English speaking families. 	1-8	Update to match ACOP: <p><u>1.10 LANGUAGE INTERPRETATION, TRANSLATION OF DOCUMENTS, AMERICAN SIGN LANGUAGE INTERPRETATION</u></p> <p><i>HABC uses contractors to:</i></p> <ul style="list-style-type: none"> ❖ <i>Provide language interpretation services over the telephone;</i> ❖ <i>Translate documents;</i> ❖ <i>Provide American Sign Language interpretation; and</i> ❖ <i>Accessibility for the hearing impaired is provided through the Maryland Relay System (dial 7-1-1).</i> <p><i>Information about how to request these services is available to HABC staff on the Baltimore Housing intranet website. The Baltimore Housing intranet website also provides a link to documents translated by HUD.</i></p> <p>1.11.1. Language Assistance <i>HABC will provide readers to assist persons with literacy barriers in completing the application and certification process.</i></p> <p>In determining whether it is feasible to provide translation of documents written in English into other languages, the HABC will consider the following factors:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Number of applicants and participants in the jurisdiction who do not speak English and speak the other language. <input type="checkbox"/> Estimated cost to HABC per client of translation of English written documents into the other language. <input type="checkbox"/> The availability of local organizations to provide translation services to non-English speaking families. <input type="checkbox"/> The availability of bilingual staff that can provide translation

FY2017 HCVP Admin Plan CURRENT POLICY	Page #	FY2018 HCVP Admin Plan AMENDMENTS PROPOSED POLICY
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		for non-English speaking families.
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Chapter 1: Statement of Policies and Objectives (Continued from previous section)

<p><u>1.12 HCVP PROGRAM MANAGEMENT ASSESSMENT OBJECTIVES (PREVIOUS SECTION J)</u></p> <p>...Supervisory staff will audit the following functions:</p> <ul style="list-style-type: none"> • Not less than 5% of reexaminations • Not less than 5% of new applications • Not less than 5% of rent adjustments 	1-8	<p>Adding a bullet for the HQS audits:</p> <ul style="list-style-type: none"> • <i>Not less than 5% of HQS inspections.</i>
<p><u>1.14 PRIVACY RIGHTS (PREVIOUS SECTION L)</u></p> <p>Applicants and participants, including all adults (i.e. 18 years of age and older) in their households, are required to sign the HUD 9886 Authorization for Release of Information form or an HABC equivalent...</p> <p>...</p> <p>All requests for access and the granting of accommodations based on this information must be approved by the Chief of Housing Applications.</p>	1-9	<p>Inserting a sentence regarding the frequency of completion:</p> <p style="color: red;"><i>“Completion of this form is required at every initial screening, interim, or regular reexamination.”</i></p> <p>...</p> <p style="color: red;">All requests for access and the granting of accommodations based on this information must be approved by the Chief of Housing Applications.</p>
<p><u>1.15 FAMILY OUTREACH (PREVIOUS SECTION M)</u></p> <p>The HABC will publicize and disseminate information to make known the availability of housing assistance and related services for very low income families on a regular basis. When the HABC waiting list is open, the HABC will publicize the availability and nature of housing assistance for very low income families through the:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Baltimore Sun <input type="checkbox"/> Afro-American Newspaper <input type="checkbox"/> City Paper <p>The Housing Authority will amend outreach subject to determination of any minority group reaching 5% of the total population, based on the most recent census or amendment thereto.</p> <p>To reach those who cannot read newspapers, the HABC will distribute fact sheets to the broadcasting media, and initiate personal contacts with members of the news media and community service personnel. The HABC will also utilize public service announcements.</p>	1-10	<p>Update to reflect current policy: HABC will may publicize and disseminate information to make known the availability of housing assistance and related services for very low income eligible families on a regular basis. When HABC’s waiting list is open, HABC will may publicize the availability and nature of housing assistance for very low income eligible families through, <i>including but not limited to</i>, the:</p> <p>Add bullet:</p> <ul style="list-style-type: none"> • Baltimore Sun • Afro-American Newspaper • City Paper • <i>Baltimore Housing Website</i> <p>HABC will may amend extend outreach subject to determination of any minority group reaching 5-2% of the total population, based on the most recent census or amendment thereto.</p> <p>To reach those who cannot read newspapers <i>further enhance outreach</i>, the HABC will may distribute fact sheets to the broadcasting media, and <i>may</i> initiate personal contacts and with members of the news media and community service personnel, <i>and with not-for-profit organizations servicing non-English speaking populations</i>. The HABC will may also utilize public</p>

FY2017 HCVP Admin Plan CURRENT POLICY	Page #	FY2018 HCVP Admin Plan AMENDMENTS PROPOSED POLICY
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		service announcements.
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Chapter 1: Statement of Policies and Objectives (Continued from previous section)

<p><u>1.15 FAMILY OUTREACH (PREVIOUS SECTION M)</u> ... The HABC will communicate the status of housing availability to other service providers in the community, and advise them of housing eligibility factors and guidelines in order that they can make proper referrals for housing assistance.</p>	1-10	<p>Continued from previous page.</p> <p><i>The HABC will may communicate the status of housing availability opportunities and eligibility requirements to other service providers in the community, and advise them of housing eligibility factors and guidelines, so in order that they can make proper referrals may refer their clients to HABC for housing assistance.</i></p>
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Chapter 2: Eligibility for Admission

<p><u>2.2 ELIGIBILITY FACTORS (PREVIOUS SECTION A)</u> HABC accepts applications only from applicants whose head of household or spouse is at least 18 years of age or older, or an emancipated minor under State law. ... HUD eligibility criteria are:</p> <ul style="list-style-type: none"> • An applicant must be a “family.” • An applicant must be a very low income family (i.e. below 50% of the jurisdictions median family income for the designated family size), or a low income family within the parameters described in Section 2.5 of this Chapter. • An applicant must furnish Social Security numbers for all family members. • At least one member of the applicant family must be either an U.S. citizen or have eligible immigration status before HABC may provide financial assistance. • No family member has committed a drug related or violent criminal activity within the last three years. • No family member is registered in the State sex offender registration program as a lifetime offender. 	2-1	<p>Revising language to make more clear, and citing CFR:</p> <p>HABC accepts applications only from applicants whose head of household, or spouse <i>or co-head</i> is at least <i>eighteen (18)</i> years of age or older, or an emancipated minor under State law. ... HUD eligibility criteria are:</p> <ul style="list-style-type: none"> • An applicant must be a “family-” <i>as defined in 24 CFR § 5.403.</i> • An applicant must be a very low <i>income-eligible as a family in accordance with 24 CFR § 982.201(b) and 24 CFR Part 5, Subpart F</i> (i.e. below 50% of the jurisdictions median family income for the designated family size), or a low income family within the parameters described in Section 2.5 of this Chapter). • An applicant must furnish Social Security numbers (SSN) for all family members. <i>Verification is of the SSN is required for all members age six (6) years and older in accordance with 24 CFR Part 5, Subpart B.</i> • At least one member of the applicant family must be either an U.S. citizen or have eligible immigration status before HABC may provide financial assistance, <i>in accordance with 24 CFR Part 5, Subpart E.</i> • No family member has committed a drug-related, or <i>violent, or other</i> criminal activity within the last three years. • No family member is <i>subject to a lifetime registration requirement registered in the under a</i> State sex offender registration program <i>as a lifetime offender (Tier III), in accordance with 24 CFR § 982.553(a)(2)(i).</i>
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<p><u>2.2 ELIGIBILITY FACTORS (PREVIOUS SECTION A)</u> ...HABC may elect not to affirmatively establish and verify citizenship eligibility before providing financial assistance to a family. However, HABC will verify and establish eligibility no later than the date of the family’s scheduled reexamination.</p>	2-2	<p>Adding clarifying language and additional paragraph:</p> <p>... However, HABC will verify and establish eligibility no later than the date of the family’s <i>next</i> scheduled reexamination...</p> <p><i>“Changes to an application may be updated online through the HCVP Applicant Portal (https://baltimore.applicants4housing.com.”</i></p>
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FY2017 HCVP Admin Plan CURRENT POLICY	Page #	FY2018 HCVP Admin Plan AMENDMENTS PROPOSED POLICY
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Chapter 2: Eligibility for Admission (Continued)

<p><u>2.3 FAMILY COMPOSITION (PREVIOUS SECTION A)</u></p> <p>The applicant must qualify as a Family. A Family may be a single person or a group of persons. A “family” includes:</p> <ul style="list-style-type: none"> <input type="checkbox"/> A family with or without a child or children. <input type="checkbox"/> Two or more persons who intend to share residency whose income and resources are available to meet the family's needs and who have a history as a family unit or show evidence of a stable family relationship. <input type="checkbox"/> A group of persons consisting of two or more elderly persons or disabled persons living together, or one or more elderly or disabled persons living with one or more live-in aides is a family. 	2-2	<p>Update to match ACOP: <i>To be eligible for admission, the applicant must qualify as a “family.” The definition of “family” is made regardless of actual or perceived sexual orientation, gender identity, or marital status. Family as defined by HUD includes but is not limited to the following:</i></p> <ul style="list-style-type: none"> • <i>A family with or without a child or children (if a child is temporarily absent from home due to placement in foster care, the temporary absence shall not be considered in determining the family composition and voucher size if the absence is presumed to be for less than 180 days);</i> • <i>An elderly family;</i> • <i>A non-elderly person with a disability family;</i> • <i>The remaining member of a participant family who was listed on the lease;</i> • <i>A one-person household who is not elderly, displaced, or a person with disabilities;</i> • <i>Two or more elderly persons or persons with disabilities living together;</i> • <i>One or more elderly persons or persons with disabilities who have a live-in aide;</i> • Two or more persons who intend to share residency whose income and resources are available to meet the family's needs and who have a history as a family unit or show evidence of a stable family relationship. • A group of persons consisting of two or more elderly persons or persons with disabilities living together, or one or more elderly person or person with disabilities living with one or more live-in aides is a family.
<p><u>2.3 FAMILY COMPOSITION (PREVIOUS SECTION A)</u></p> <p>2.3.2 Head of Household</p> <p>The head of household is the adult member of the household who is designated by the family as head, is wholly or partly responsible for paying the rent, and has the legal capacity to enter into a lease under State/local law. Emancipated minors who qualify under State law will be recognized as head of household if there is a court order recognizing them as an emancipated minor.</p>	2-2	<p>Update to match ACOP: The head of household is the adult member of the household who is designated by the family as head, is wholly or partly responsible for paying the rent, and has the legal capacity to enter into a lease under State/local law. <i>HABC does not permit a parent or legal guardian to co-sign any document on the applicant’s behalf if the head of household is under eighteen (18) and, under State and local law, does not have the legal capacity to enter into a legally binding contract.</i></p> <p>Emancipated minors who qualify under State law will be recognized as head of household if there is a court order declaring them as an emancipated minor. <i>If there is no court order, HABC will consider other evidence of emancipation recognized under Maryland state law such as, for example, a person under eighteen (18) years old who is married or serving in the military.</i></p> <p><i>A family may designate an elderly member or a member who is a non-elderly person with a disability as head of household solely to qualify the family for the allowance available for elderly persons and non-elderly persons with disabilities,</i></p>

FY2017 HCVP Admin Plan CURRENT POLICY	Page #	FY2018 HCVP Admin Plan AMENDMENTS PROPOSED POLICY
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		<i>provided that the person is at least partially responsible for paying the rent.</i>
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Chapter 2: Eligibility for Admission (Continued)

<p><u>2.3 FAMILY COMPOSITION (PREVIOUS SECTION A)</u></p> <p>2.3.4 Co-Head</p> <p>A “co-head” is an individual in the household who is equally responsible for the lease with the Head of Household. A family may have a spouse or co-head, but not both. A co-head never qualifies as a dependent.</p>	2-3	<p>Update to match ACOP:</p> <p><i>The co-head is an individual in the household who is equally responsible with the head of household for ensuring the family fulfills all of its responsibilities under the Program, but who is not the spouse for the lease with the Head of Household. A family-household may have either a spouse or co-head, but not both. A co-head never qualifies as a dependent.</i></p> <p>Added the following categories:</p> <p>2.3.5. Adult / Other Adult <i>An adult is an individual who is eighteen (18) years of age or older. Other adult means a family member, other than the head of household, spouse or co-head, who is eighteen (18) years of age or older. Foster adults and live-in aides are NOT considered other adults.</i></p> <p>2.3.6. Elderly Person <i>An elderly person is a person who is at least sixty-two (62) years of age.</i></p> <p>2.3.7. Elderly Family <i>An elderly family is one in which the head, spouse, co-head, or sole member is an elderly person. Elderly families qualify for the elderly family allowance and medical allowance as described in Chapter 6, Section 6.3.2.</i></p> <p>2.3.8. Non-Elderly Person with a Disability Family <i>A non-elderly person with a disability family is a family whose sole member, head of household, co-head, or head of household’s spouse is a person with a disability who is under the age of sixty-two (62).</i></p>
<p><u>2.3 FAMILY COMPOSITION (PREVIOUS SECTION A)</u></p> <p>2.3.9 Live-In Aides</p> <p>A Family may include a live-in aide provided that such live-in aide:</p> <ul style="list-style-type: none"> • ... • ... • Can demonstrate current residency in good standing by providing a landlord reference. <p>...</p>	2-3	<p>Replacing last bullet:</p> <ul style="list-style-type: none"> • <i>Meets all applicable eligibility criteria.</i>

FY2017 HCVP Admin Plan CURRENT POLICY	Page #	FY2018 HCVP Admin Plan AMENDMENTS PROPOSED POLICY
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Chapter 2: Eligibility for Admission (Continued)

<p><u>2.5 MANDATORY SOCIAL SECURITY NUMBERS (PREVIOUS SECTION C)</u></p> <p>The applicant and all members of the applicant’s household must provide the complete and accurate Social Security number assigned to each household member, and the documentation necessary to verify each Social Security number.</p> <p>Applicants are required to provide verification or signed certifications of Social Security numbers for all family members age six (6) and older prior to admission if they have been issued a number by the Social Security Administration. This requirement does not apply to non-citizens who do not contend they have eligible immigration status.</p> <p>...</p> <p>Persons who disclose their Social Security number but cannot provide verification must sign a certification and provide verification within ninety (90) calendar days.</p>	2-5	<p>Adding language to clarify PIH Notice 2016-05, Attachment A, Verification of Social Security Numbers for Applicants and Participants:</p> <p>The applicant and all members of the applicant’s household must provide the complete and accurate Social Security number assigned to each household member, and the documentation necessary to verify each Social Security number <i>for members over the age of six (6) years.</i></p> <p>Applicants are required to provide verification or signed certifications of Social Security numbers for all family members age six (6) and older prior to admission <i>within ninety (90) calendar days of voucher issuance</i>, if they have been issued a number by the Social Security Administration. This requirement does not apply to non-citizens who do not contend they have eligible immigration status.</p> <p>...</p> <p>Persons who disclose their Social Security number but cannot provide verification must sign a certification and provide verification within ninety (90) calendar days <i>of voucher issuance.</i></p>
<p><u>E. OTHER CRITERIA FOR ADMISSIONS (PREVIOUS SECTION E)</u></p> <ul style="list-style-type: none"> • The family must not have violated... • The family must pay any outstanding debt owed the HABC or another PHA as a result of prior participation in any federal housing program within 30 days of HABC notice to repay. • The family must be in good standing... 	2-7	<p>Section Letter changed from “E” to “2.7”</p> <p>Change timeframe to pay debts in full:</p> <ul style="list-style-type: none"> • The family must not have violated... • The family must pay <i>in full</i> any outstanding debt owed to the HABC or another PHA as a result of prior participation in any federal housing program within <i>sixty (3060)</i> days of HABC notice to repay. • The family must be in good standing...

FY2017 HCVP Admin Plan CURRENT POLICY	Page #	FY2018 HCVP Admin Plan AMENDMENTS PROPOSED POLICY
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Chapter 2: Eligibility for Admission (Continued)

<p><u>F. TENANT SCREENING</u></p> <p>Inserting policy regarding screening for double subsidy.</p>	<p>2-7 to 2-8</p>	<p>Section Letter changed from “F” to “2.8”</p> <p>Adding the following section for screening for double subsidies:</p> <p><i>2.8.1 Enterprise Income Verification (EIV) Screening</i></p> <p><i>HABC will conduct EIV screening for new applicants. An EIV existing tenant search will be conducted on minor and adult members to identify applicants who may be received federal rental assistance. If the EIV existing tenant search reveals that an applicant may be receiving another federal housing program subsidy, HABC will give the applicant an opportunity to explain any circumstances relative to his/her receiving another federal rental assistance subsidy. HABC may contact the respective Public Housing Agency (PHA) or owner to confirm the individual’s program participation status before admission. HABC will not provide assistance to an applicant until confirmation is obtained that there will be no duplicate rental assistance.</i></p> <p><i>HABC will conduct EIV screening on all adult household members to identify former residents of federally assisted rental programs who voluntarily or involuntarily left the program and have a reportable adverse status and/or owe money to a PHA or to a landlord as a result of participation in a HCV Program.</i></p> <p><i>HABC will retain the search results with the application along with any documentation obtained as a result of contact with the applicant and the PHA and/or owner at the other location.</i></p>
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FY2017 HCVP Admin Plan CURRENT POLICY	Page #	FY2018 HCVP Admin Plan AMENDMENTS PROPOSED POLICY
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Chapter 2: Eligibility for Admission (Continued)

<p><u>F. TENANT SCREENING (Continued)</u></p> <p>Inserting policy regarding debt screening, repayment or denial, and mitigating factors.</p>	<p>2-7 to 2-8</p>	<p>Add the following new policy on screening debt:</p> <p>2.8.2 Debt Screening <i>HABC will conduct a debt screening on all members age eighteen (18) years and older.</i></p> <p><i>Previous outstanding debts to HABC or any public housing authority resulting from a previous tenancy in the public housing or participation in the HCVP must be paid in full prior to admission. No payment agreement will be accepted. The applicant will be rejected unless the applicant pays the debt in full within sixty (60) calendar days from the date HABC notifies the applicant of the debt unless HABC determines that mitigating circumstances exist or the debt cannot be collected under state law. A determination as to whether the debt may be collected shall be made in consultation with HABC’s Office of Legal Affairs.</i></p> <p>2.8.2.1 Denial for Debt to HABC <i>HABC may deny assistance to an applicant:</i></p> <ul style="list-style-type: none"> • <i>If the applicant family has current debt to HABC or another PHA or a judgment against them in connection with participation in the HCVP or any other public housing assistance under the 1937 Act for amounts paid to a HCVP (“Section 8”) landlord or owner under a HAP contract for rent, damages to the unit or other amounts owed by the applicant family under a lease and the amount is not fully repaid within sixty (60) calendar days from the date HABC notifies the applicant of the debt; and/or</i> • <i>If the applicant family has breached a repayment agreement with HABC or another PHA entered in connection with participation in the HCVP or any other public housing assistance under the 1937 Act, and the amount is not fully repaid within sixty (60) calendar days from the date of the screening appointment.</i> <p>2.8.2.2 Mitigating Factors <i>Review and approval by the Deputy Chief of HCVP or designee, is required when admission is based on mitigating factors. HABC may consider the following factors when considering denial of assistance related to debt screening:</i></p> <ul style="list-style-type: none"> • <i>The effects that denial of assistance may have on other members of the family who were not involved in the action or failure to act.</i> • <i>Circumstances which led to the creation of the debt (i.e. death of a household member, layoff, medical expenses, etc.).</i> • <i>Current financial circumstances.</i> • <i>The extent of participation or culpability of individual family members, including whether the</i>
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FY2017 HCVP Admin Plan CURRENT POLICY	Page #	FY2018 HCVP Admin Plan AMENDMENTS PROPOSED POLICY
--	-----------	--

		<i>culpable family member is a minor or a person with disabilities, or a victim of domestic violence, dating violence, or stalking.</i>
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Chapter 2: Eligibility for Admission (Continued)

<p><u>2.12 VIOLENCE AGAINST WOMEN ACT (VAWA): Victims of Domestic Violence, Dating Violence and/or Stalking (PREVIOUS SECTION J)</u></p> <p>In compliance with the Violence Against Women Act of 2005, an individual’s status as a victim of domestic violence, dating violence, or stalking will not be the basis for denial of program assistance or for denial of admission, if the applicant otherwise qualifies for assistance or admission (See Chapter 15, I).</p>	2-9	<p>Updating language to comply with VAWA 2013:</p> <p>In compliance with the Violence Against Women Act of 2005 (<i>VAWA 2005</i>) and the <i>VAWA Reauthorization Act of 2013 (VAWA 2013)</i>, an individual’s status <i>regardless of sex, gender identity, or sexual orientation</i>, as a victim of domestic violence, dating violence, <i>sexual assault</i> or stalking will not be the basis for denial of program assistance or for denial of admission, if the applicant otherwise qualifies for assistance or admission (See Chapter 15, Section 15.11).</p>
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Chapter 3: Applying for Admission

<p><u>H. FINAL DETERMINATION AND NOTIFICATION OF ELIGIBILITY</u></p> <p>... Applicants will be denied assistance and removed from the list for the following reasons:</p> <ol style="list-style-type: none"> Determined ineligible as a result of... The applicant does not respond to the requested information or cannot provide the information necessary for the Authority to verify the applicant’s status for program selection within a seven (7) day period... 	3-7	<p>Section Letter changed from “H” to “3.9”</p> <p>Changed bullet letter “b” to read:</p> <ol style="list-style-type: none"> The applicant does not respond to the requested information or cannot provide the information necessary for the Authority <i>HABC</i> to verify the applicant’s status for program selection within a seven <i>ten (710)</i> day period.
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Chapter 4: Establishing Preferences and Maintaining the Waiting List

<p><u>No Current Policy</u></p>	4-16	<p>Added Set-Aside “Section 4.13”:</p> <p><i>4.13 SET-ASIDE VOUCHERS FOR EARLY CHILDHOOD</i> <i>Subject to availability of funding, two hundred and fifty (250) Housing Choice Vouchers will be set aside for issuance to eligible families with one or more children under the age of six (6) who are already on the tenant-based waiting list.</i></p>
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Chapter 5: Subsidy Standards

<p><u>5.1 INTRODUCTION</u></p> <p>... This Chapter explains the subsidy standard that will be used to determine the voucher size (family unit size) for a family upon selection from the waiting list...</p>	5-9	<p>Adding language to clarify that subsidy standards are used to determine family composition for applicants and participants, not just applicants upon selection from the waiting list:</p> <p>... This Chapter explains the subsidy standard that will be used to determine <i>family composition and</i> the voucher size (family unit size) for <i>any applicant or participant</i></p>
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FY2017 HCVP Admin Plan CURRENT POLICY	Page #	FY2018 HCVP Admin Plan AMENDMENTS PROPOSED POLICY
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		family upon selection from the waiting list...
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Chapter 5: Subsidy Standards (Continued)

<p><u>A. DETERMINING FAMILY UNIT (VOUCHER) SIZE</u></p> <p><i>Moved Guideline Chart to this section; added second section "Parameters for Determining Voucher Size."</i></p>	<p>5-9</p>	<p>Section Letter changed from "A" to "5.2"</p> <p><i>GUIDELINES FOR DETERMINING VOUCHER SIZE</i></p> <table border="1"> <thead> <tr> <th colspan="3">Persons in Household</th> </tr> <tr> <th>Voucher Size</th> <th>Minimum</th> <th>Maximum</th> </tr> </thead> <tbody> <tr> <td>0 Bedroom</td> <td>1</td> <td>1</td> </tr> <tr> <td>1 Bedroom</td> <td>1</td> <td>2</td> </tr> <tr> <td>2 Bedrooms</td> <td>2</td> <td>4</td> </tr> <tr> <td>3 Bedrooms</td> <td>3</td> <td>6</td> </tr> <tr> <td>4 Bedrooms</td> <td>4</td> <td>8</td> </tr> <tr> <td>5 Bedrooms</td> <td>6</td> <td>10</td> </tr> <tr> <td>6 Bedrooms</td> <td>8</td> <td>12</td> </tr> </tbody> </table>	Persons in Household			Voucher Size	Minimum	Maximum	0 Bedroom	1	1	1 Bedroom	1	2	2 Bedrooms	2	4	3 Bedrooms	3	6	4 Bedrooms	4	8	5 Bedrooms	6	10	6 Bedrooms	8	12
Persons in Household																													
Voucher Size	Minimum	Maximum																											
0 Bedroom	1	1																											
1 Bedroom	1	2																											
2 Bedrooms	2	4																											
3 Bedrooms	3	6																											
4 Bedrooms	4	8																											
5 Bedrooms	6	10																											
6 Bedrooms	8	12																											
<p><u>A. DETERMINING FAMILY UNIT SIZE</u></p> <p>For subsidy standards, an adult is a person 18 years or older.</p> <p>All standards in this section relate to the number of bedrooms on the voucher, not the family's actual living arrangements. The unit size on the Voucher remains the same as long as the family composition remains the same, regardless of the actual unit size rented.</p>	<p>5-9</p>	<p>Section ADDED and renamed to "5.3 PARAMETERS FOR DETERMINATION OF VOUCHER SIZE"</p> <p>For subsidy standards, an adult is a person <i>as defined in this Administrative Plan, who is eighteen (18) years or older...</i></p>																											

FY2017 HCVP Admin Plan CURRENT POLICY	Page #	FY2018 HCVP Admin Plan AMENDMENTS PROPOSED POLICY
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Chapter 5: Subsidy Standards (Continued)

<p>Generally, the HABC assigns one bedroom to two people within the following guidelines (NOTE: a “generation” is an age range of 15 years):</p> <ul style="list-style-type: none"> • Children under the age of four (4) will share one bedroom with a related guardian provided there are no more than two (2) people per bedroom. ** • Persons of different generations, persons of the opposite sex whose cumulative age is 8 years or greater (other than spouses), and unrelated adults should be allocated a separate bedroom. • Two children of opposite sexes whose cumulative age is less than 12 years shall be allocated one bedroom. • Foster children, appropriately documented, will be included in determining unit size only if they will be in the unit for more than 180 days per year. • Live-in attendants will generally be provided a separate bedroom. No additional bedrooms are provided for the attendant's family. Live-in attendants do not have any rights to the voucher. • Space may be provided for a child who is away at school but who lives with the family during school recesses provided that it does not result in an otherwise unused room. • A single pregnant woman with no other family members must be treated as a two-person family. • Single person families shall be allocated one bedroom. <p>**A reasonable accommodation may be requested by persons with disabilities by contacting the HABC HCVP Office in writing at 1225 W Pratt Street, Baltimore, MD 21223 or by calling (443) 984-2222.</p>	<p>5-9</p>	<p>Revised section to read as follows:</p> <p>Generally, the HABC assigns one bedroom to two people; however, within the following guidelines <i>may apply</i> (NOTE: a “generation” is an age range of 15 years):</p> <ul style="list-style-type: none"> • Single person families... • A single pregnant woman... • <i>A same or opposite sex couple who is married, has an interdependent relationship or domestic partnership will be allocated a one bedroom voucher.</i> • <i>Other than adults who are married, have an interdependent relationship or domestic partnership, adults of the opposite sex will not be required to share a bedroom.</i> • <i>Under Continued Assistance, for participants who are already on the program, children under the age of four (4) will be required to share one bedroom with a related guardian provided there are no more than two (2) people per bedroom. **</i> • <i>Household members of the same sex, who are seven (7) or more years apart, will not be required to share a bedroom, although they may share a bedroom at the family’s request.</i> • <i>Two household members of the same sex, who are less than seven (7) years apart, will be allocated one bedroom.</i> • <i>Children Persons of different generations, persons of the opposite sex whose cumulative age is 8 years or greater, and unrelated adults should be allocated a separate bedroom will not be required to share a bedroom, unless their age difference is not more than four (4) years and the oldest child is five (5) years old or younger; children of the opposite sex may share a bedroom at the family’s request.</i> • Two children of opposite sexes whose cumulative age is less than 12 years shall be allocated one bedroom. • Foster children, appropriately documented, will be included in determining unit <i>voucher</i> size only if they will be in the unit <i>residing with the family</i> for more than one-hundred and eighty <i>(180) calendar</i> days per year. • Live-in attendants will generally be provided a separate bedroom. No additional bedrooms are provided for the attendant's family. Live-in attendants do not have any rights to the voucher. • Space may be provided for a child <i>student</i> who is away at school but who lives with the family during school recesses, provided that it does not result in an otherwise unused room. • <i>Space will not be provided for a family member who will be absent for more than one-hundred and eighty (180) cumulative calendar days in a twelve month period, except for family members who have been called to active duty.</i>
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FY2017 HCVP Admin Plan CURRENT POLICY	Page #	FY2018 HCVP Admin Plan AMENDMENTS PROPOSED POLICY
--	-----------	--

		<p><i>In the case where a family member has been called to active duty, the family composition will remain unchanged even if the family member is absent from the unit for more than six (6) months. After one (1) year, HABC may reevaluate the situation and may take action to ensure the voucher size is relevant to the family composition.</i></p>
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Chapter 5: Subsidy Standards (Continued)

<p><u>5.5 UNIT SIZE SELECTED (PREVIOUS UNIT C)</u></p> <p>5.5.1. Unit Size</p> <p>The unit size shall not exceed the voucher size by more than one bedroom.</p>	5-11	<p>Adding language regarding reasonable accommodations:</p> <p>The unit size shall not exceed the voucher size by more than one bedroom. <i>A reasonable accommodation may be requested, and granted upon approval by the Deputy Chief for HCVP, or designee.</i></p>
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Chapter 6: Factors Related to Total Tenant Payment and Family Share Determination

<p><u>B. INCOME AND ALLOWANCES</u></p> <p><u>Annual Income</u></p> <p>...Annual income includes, but is not limited to:</p> <ul style="list-style-type: none"> • Periodic determinable allowances such as alimony and child support payments (i.e. amount awarded by the court unless evidenced by third party documentation to the contrary), and regular contribution from non-lease members. 	6-1	<p>Section Letter changed from “B” to “6.3” and identify “Annual Income” section as Section “6.3.1”</p> <p>Revise bullet to read, and add section on <i>gift contributions</i>:</p> <ul style="list-style-type: none"> • Periodic <i>and</i> determinable, allowances such as alimony and child support payments (i.e. amount awarded by the court unless evidenced by third party documentation to the contrary), and regular <i>cash and non-cash contributions or gifts received</i> from <i>agencies or</i> non-lease members. <ul style="list-style-type: none"> ○ <i>Any contribution or gift received every two (2) months or more frequently will be considered a “regular” contribution or gift, unless the amount is less than \$600.00 per year.</i>
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FY2017 HCVP Admin Plan CURRENT POLICY	Page #	FY2018 HCVP Admin Plan AMENDMENTS PROPOSED POLICY
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Chapter 6: Factors Related to Total Tenant Payment and Family Share Determination (Continued)

<p><u>C. EXCLUSION OF EARNED INCOME FROM RENT DETERMINATIONS FOR PERSONS WITH DISABILITIES</u></p> <p>...</p> <p><u>Maximum Four Year Disallowance</u></p> <p>The earned income disallowance is limited to a lifetime 48-month period for each family member who is a person with disabilities. For each family member who is a person with disabilities, the disallowance only applies for a maximum of 12-months of full exclusion of incremental increase, and a maximum of 12-months of phase-in exclusion during the 48-month period starting from the date of the initial exclusion.</p> <p>If the period of increased income does not last for 12 consecutive months, the disallowance period may be resumed at any time within the 48-month period. It may be continued until the disallowance has been applied for a total of 12-months of each disallowance (the initial 12-month full exclusion and the second 12-month phase-in exclusion).</p> <p>No earned income disallowance will be applied after the 48-month period following the initial date the exclusion was applied.</p>	<p>6-3 To 6-5</p>	<p>Section Letter changed from “C” to “6.4” and title changed to “EARNED INCOME DISREGARD (EID) FOR PERSONS WITH DISABILITIES”</p> <p>Changes are mandatory as per PIH Notice 2016-05, Attachment E, effective May 9, 2016 and also as published on March 8, 2016 in the Federal Regulations (FR-5743-F-03) with an effective date of April 7, 2016 (changes are only applied to new enrollments, families currently enrolled will continue to abide by previous requirements):</p> <p>6.4.4. Maximum Four Two Year Disallowance Disregard</p> <p>The earned income disallowance <i>disregard</i> is limited to a lifetime 2448-month period for each family member who is a person with disabilities. For each family member who is a person with disabilities, the disallowance <i>disregard</i> only applies for a maximum of 12-months of full exclusion of incremental increase, and a maximum of 12-months of phase-in exclusion during the 2448-month period starting from the date of the initial exclusion.</p> <p>If the period of increased income does not last for 12 consecutive months, the disallowance <i>24-month disregard</i> period may be resumed <i>continues at any time within the 48-month period</i>. It may be continued until the disallowance <i>disregard</i> has been applied for a total of 2412-months of each disallowance (the initial 12-month full exclusion and the second 12-month phase-in exclusion). <i>The EID benefit is limited to a lifetime 24-month period for the qualifying family member.</i></p> <p>No earned income disallowance <i>disregard</i> will be applied after the 2448-month period following the initial date the exclusion was applied.</p>
<p><u>D. MINIMUM RENT</u></p> <p>Minimum rent refers to the Total Tenant Payment and includes the combined amount a family pays towards rent and/or utilities when it is applied. HABC has a \$0 minimum rent policy. However, HABC will for each \$0 rent determined family:</p> <p><input type="checkbox"/> Assist \$0 rent families in obtaining financial assistance for which they may be eligible by providing information on social service agencies and other organizations that may be of assistance.</p>	<p>6-8</p>	<p>Section Letter changed from “D” to “6.5” setting minimum rent at \$25:</p> <p>Minimum rent refers to the Total Tenant Payment and includes the combined amount a family pays towards rent and/or utilities when it is applied. HABC has a \$25 minimum rent policy. However, HABC will for each \$25 rent determined family:</p> <ul style="list-style-type: none"> • Assist \$25 rent families in obtaining financial assistance for which they may be eligible by providing information on social service agencies and other organizations that may be of assistance. • Monitor the financial status of such families. • Report to management on a monthly basis the amount of \$25 rent families.

FY2017 HCVP Admin Plan CURRENT POLICY	Page #	FY2018 HCVP Admin Plan AMENDMENTS PROPOSED POLICY
--	-----------	--

<input type="checkbox"/> Monitor the financial status of such families. <input type="checkbox"/> Report to management on a monthly basis the amount of \$0 rent families.		<i>HABC will allow for financial hardship exemptions and will follow the regulations for such exemptions as published at 24 CFR § 5.630. Hardship exemptions may be requested by the family from payment of minimum rent due to financial hardship. The exemption must be reviewed and approved by the Deputy Chief for HCVP, or designee.</i>
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Chapter 6: Factors Related to Total Tenant Payment and Family Share Determination (Continued)

<p><u>6.6 DEFINITION OF TEMPORARILY / PERMANENTLY ABSENT (PREVIOUS SECTION E)</u></p> <p>6.6.1. Absence of Any Member</p> <p>Any member of the household will be considered permanently absent if s/he is away from the unit for more than one hundred and eighty (180) consecutive days, except as otherwise provided in this Chapter.</p>	6-6	<p>Adding paragraph regarding family members who are absent because they've been called to active duty in the military:</p> <p><i>Space will not be provided for a family member who will be absent for more than one-hundred and eighty (180) cumulative calendar days in a twelve month period, except for family members who have been called to active duty. In the case where a family member has been called to active duty, the family composition will remain unchanged even if the family member is absent from the unit for more than six (6) months. After one (1) year, HABC may reevaluate the situation and may take action to ensure the voucher size is relevant to the family composition.</i></p>
<p>6.6.4. Absence due to Incarceration</p> <p>...Members with a history of criminal activity may be removed at the request of the head of household.</p>	6-7	<p>Adding timeframe to make the request:</p> <p>Members with a history of criminal activity may be removed at the request of the head of household <i>(on a case by case basis)</i>. <i>Requests of this nature must be made within thirty (30) calendar days of the incarceration or arresting action of the household member.</i></p>
<p>6.6.8. Visitors</p> <p>Any adult, who has been in the unit more than fourteen (14) consecutive days without HABC approval, or a total of ninety (90) days in a twelve (12) month period, will be considered to be living in the unit as an unauthorized household member...</p>	6-8	<p>Adding language to clarify any person may be considered a visitor under these parameters:</p> <p>Any adult <i>person</i>, who has been in the unit more than fourteen (14) consecutive days without HABC approval, or a total of ninety (90) days in a twelve (12) month period, will be considered to be living in the unit as an unauthorized household member...</p>
<p><u>G. MINIMUM INCOME</u></p> <p>There is no minimum income requirement. Families who report zero income are required to undergo an interim re-examination every 120 days and will be required to provide information regarding their means of basic subsistence, such as food, utilities, transportation, etc.</p>	6-9	<p>Section Letter changed from "G" to "6.8"</p> <p>Revise to the following:</p> <p>There is no minimum income requirement. Families who report zero income are required to undergo an interim re-examination <i>review</i> every <i>one hundred and twenty (120) calendar</i> days and will be required to provide information regarding their means of basic subsistence, such as food, utilities, transportation, etc.</p>
<p><u>I. REGULAR CONTRIBUTIONS AND GIFTS</u></p> <p>... Any contribution or gift received annually or more frequently will be considered a "regular" contribution or gift, unless the amount is less than</p>	6-10	<p>Section Letter changed from "I" to "6.10"</p> <p>Revise to the following:</p> <p>Any contribution or gift received annually <i>two (2) months</i> or more frequently will be considered a "regular" contribution or</p>

FY2017 HCVP Admin Plan CURRENT POLICY	Page #	FY2018 HCVP Admin Plan AMENDMENTS PROPOSED POLICY
--	-----------	--

\$500 per year. This includes rent and utility payments made on behalf of the family and other cash or non-cash contributions or sporadic gifts (see “Verification Procedures” chapter for further definition.		gift, unless the amount is less than \$500 \$600 per year...
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Chapter 6: Factors Related to Total Tenant Payment and Family Share Determination (Continued)

<p><u>M. ASSETS DISPOSED OF FOR LESS THAN FAIR MARKET VALUE</u></p> <p>The HABC must count assets disposed of for less than fair market value during the two years preceding certification or re-examination. The HABC will count the difference between the market value and the actual payment received in calculating total assets for two years.</p> <p>...</p> <p>If the total value of assets disposed of within a one-year period is less than \$5,000, they will not be considered an asset.</p>	6-11	<p>Section Letter changed from “M” to “6.14”</p> <p>Revise to the following:</p> <p>The HABC must count assets disposed of for less than fair market value during the two years preceding certification or re-examination. The HABC will count the difference between the market value and the actual payment received in calculating total assets for two years.</p> <p>...</p> <p><i>HABC’s minimum threshold for counting assets disposed of for less than fair market value is \$5,000. If the total value of assets disposed of within a one the two-year period is less than \$5,000, they will not be considered an asset.</i></p>
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Chapter 8: Voucher Issuance and Briefings

<p><u>8.6 TERM OF VOUCHER (previous section F)</u></p> <p>8.6.1. Expirations / Extensions</p> <p>The voucher is valid for a total period of sixty (60) days from the date of issuance.</p> <p>One thirty (30) day extension may be approved by the Leasing Specialist. The extension will only be granted after the provision of documentation of the family’s search efforts. The family must provide a log or listing of the properties which they have attempted to rent and an explanation as to why they were unable to rent each unit.</p> <p>Upon receiving a request, either written or oral, from a household that includes a member with a disability, HABC will extend the voucher term by an additional thirty (30) days if needed as a reasonable accommodation to make the program accessible to and usable by a person with a disability and after the provision of documentation of the family’s search efforts or the reason(s) why a search could not be made. The family must provide a log or listing of the properties which they have attempted to rent and an explanation as to why they were unable to rent each unit.</p> <p>Requests for additional extensions may be made but must be accompanied with documentation of the family’s search efforts or other justifications as to</p>	# 8-6	<p>Adding language to clarify current policy:</p> <p>The voucher is valid for a total period of sixty (60) <i>calendar</i> days from the date of issuance.</p> <p>One thirty (30) <i>calendar</i> day extension may be approved by the Leasing Program Specialist. The extension will only be granted after the provision of documentation of the family’s search efforts. <i>Upon receiving a request for extension, either written or oral, the family must may be required to provide a log or listing of the properties which they have attempted to rent and an explanation as to why they were unable to rent each unit.</i></p> <p>Upon receiving a request, either written or oral, from a household that includes a member with a disability, HABC will extend the voucher term by <i>an additional thirty</i> (30) <i>calendar</i> days if needed as a reasonable accommodation. <i>This accommodation will</i> make the program accessible to and usable by a person with a disability. <i>Approval of the accommodation depends on</i> the provision of documentation of the family’s search efforts or the reason(s) why a search could not be made. The family must provide a log or listing of the properties which they have attempted to rent and an explanation as to why they were unable to rent each unit.</p> <p>Requests for additional extensions may be made but must the family may be required to submit <i>accompanied with</i> documentation of the family’s search efforts or other justifications as to why an extension should be granted.</p>
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FY2017 HCVP Admin Plan CURRENT POLICY	Page #	FY2018 HCVP Admin Plan AMENDMENTS PROPOSED POLICY
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why an extension should be granted.		
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Chapter 8: Voucher Issuance and Briefings (Continued)

<p><u>8.7 RETENTION OF VOUCHER – SPLIT HOUSEHOLDS</u></p> <p>...If documentation is not provided, HABC will terminate assistance on the basis of failure to provide information necessary for a re-examination.</p>	<p>8-7 to 8-8</p>	<p>Adding language to clarify current policy:</p> <p>...If documentation is not provided, HABC will <i>may</i> terminate assistance on the basis of failure to provide information necessary for to re-determine a re-examination family composition as it relates to the family obligations.</p>
<p><u>8.8 RET OF VOUCHER – REMAINING MEMBER OF TNT FAMILY</u></p> <p>...In order for a minor child to continue to receive assistance as a remaining family member:</p> <ul style="list-style-type: none"> ... HABC has to have verified that social services and/or the Juvenile Court has arranged for another adult to be brought into the assisted unit to care for the children for an indefinite period. <p>A reduction in family size may require a reduction in the voucher family unit size.</p>	<p>8-8</p>	<p>Adding language to clarify current policy:</p> <p>...In order for a minor child to continue to receive assistance as a remaining family member:</p> <ul style="list-style-type: none"> ... HABC has to have verified that social services and/or the Juvenile Court has arranged for another adult to be brought into the assisted unit to care for the <i>child or</i> children for an indefinite period. <p><i>Any additional family member must follow tenant screening protocol as dictated in this Administrative Plan.</i> A reduction in family size may require a reduction in the voucher family unit size.</p>

Chapter 9: Request for Approval of Tenancy and Contract Execution

<p><u>9.4 LEASE REVIEW</u></p> <p>...</p> <p>The lease must specify the:</p> <ul style="list-style-type: none"> Names of the owner and tenant. Address of the unit rented (including apartment number, if any). ... 	<p>9-3</p>	<p>Adding policy to have lease specify contact information:</p> <p>...</p> <p>The lease must specify the:</p> <ul style="list-style-type: none"> Names <i>and contact information</i> of the owner and tenant. Address of the unit rented (including apartment number, if any). <p>...</p>
<p>9.4.1 Actions Before Lease Term</p> <p>All of the following must be completed before the beginning of the initial term of the lease for a unit:</p> <ul style="list-style-type: none"> ... Provide the following required documentation prior to lease signing... The landlord and tenant have executed the lease... 	<p>9-4</p>	<p>Adding language to clarify owners required to provide documentation and to confirm that utility service is active and legal:</p> <ul style="list-style-type: none"> ... <i>Owner must</i> provide the following required documentation prior to lease signing... <i>Owner must confirm active and legal utility service through Inspection process.</i> The landlord and tenant have executed the lease...

FY2017 HCVP Admin Plan CURRENT POLICY	Page #	FY2018 HCVP Admin Plan AMENDMENTS PROPOSED POLICY
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Chapter 9: Request for Approval of Tenancy and Contract Execution

<p><u>9.5 SEPARATE AGREEMENTS (SECTION D)</u> Separate agreements are not necessarily illegal side agreements. Families and owners will be advised of the prohibition of illegal side payments for additional rent, or for items normally included in the rent of unassisted families, or for items not shown on the approved lease. The family is not liable under the lease for unpaid charges for items covered by separate agreements and nonpayment of these agreements cannot be cause for eviction. Owners and families may execute separate agreements for services, appliances (other than range and refrigerator) and other items that are not included in the lease if the agreement is in writing and approved by HABC.</p>	<p>9-4 To 9-5</p>	<p>Revising last sentence – HABC does not approve any side/separate agreements:</p> <p>...Owners and families may execute separate agreements for services, appliances (other than range and refrigerator) and other items that are not included in the lease, <i>however if the agreement is in writing and approved by HABC is not a responsible party in this type of agreement.</i></p>
<p><u>9.12 CONTRACT EXECUTION PROCESS</u> ...HABC requires the following information from the landlord to execute the HAP Contract:</p> <ul style="list-style-type: none"> • An employer identification number or social security number. • A copy of their driver’s license or other photo identification. • ... • For properties constructed prior to 1978, proof of registration with the Maryland Department of the Environment, Lead Prevention Program. 	<p>9-6</p>	<p>Adding additional requirements and clarifications:</p> <ul style="list-style-type: none"> • An employer identification number or social security number. • A copy of their <i>the</i> driver’s license or other photo identification <i>for the owner and the owner’s representative who may be signing the contract on the owners’ behalf.</i> • ... • For properties constructed prior to 1978, proof of registration with the Maryland Department of the Environment, Lead Prevention Program. • <i>HABC’s Electronic Direct Deposit Request Form; and</i> • <i>Landlord Portal Registration Forms.</i>

Chapter 10: Housing Quality Standards and Inspections

<p><u>10.2 GUIDELINES / TYPES OF INSPECTIONS</u></p> <p>10.2.7 Bedrooms ... All bedrooms must have exposure to the exterior with a functioning window. All bedrooms must have adequate electrical service. ...</p>	<p>10-3</p>	<p>Adding sentence to revise policy regarding skylights:</p> <p>All bedrooms must have exposure to the exterior with a functioning window. <i>On pre-contract inspections, skylights will no longer be considered windows.</i> All bedrooms must have adequate electrical service.</p>
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FY2017 HCVP Admin Plan CURRENT POLICY	Page #	FY2018 HCVP Admin Plan AMENDMENTS PROPOSED POLICY
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**Chapter 10: Housing Quality Standards and Inspections
(Continued)**

<p><u>10.2 GUIDELINES / TYPES OF INSPECTIONS</u></p> <p>10.2.9 Modifications</p> <p>...</p> <p>All utilities must be in service prior to the effective date of the HAP Contract. If the utilities are not in service at the time of inspection the inspector will notify the tenant or owner (whomever is responsible for the utilities according to the RFTA) to have the utilities turned on. The responsible person will be required to submit documentation evidencing that the utilities are turned on prior to contract execution.</p> <p>If the tenant is responsible for supplying the stove and/or refrigerator, HABC will allow the stove and refrigerator to be placed in the unit after the unit passes all other HQS. The family must then certify that the appliances are in the unit and working. HABC will not conduct a re-inspection.</p> <p>...</p>	<p>10-4</p>	<p>Revising section to clarify the process when utilities are found inactive at the time of initial inspection and that it is the owners responsibility to ensure active and legal service:</p> <p>All utilities must be in service prior to the effective date of the HAP Contract. If the utilities are not in service at the time of inspection the inspector will <i>stop the inspection immediately and</i> notify the tenant or owner (whomever is responsible for the utilities according to the RFTA) to have the utilities turned on. The responsible person will be required to submit documentation evidencing <i>Once the owner notifies HABC that the utilities are turned on, HCVP will schedule a re-inspection to confirm active and legal utilities. This will occur prior to contract execution. If the unit shows any signs of illegal or fraudulent utility hook-up, the inspection will be terminated immediately and the voucher holder will be given a new RFTA to find another unit.</i></p> <p>...The family must then certify <i>to HABC in writing</i> that the appliances are in the unit and working. HABC will not conduct a re-inspection.</p>
<p><u>10.3 PRE-CONTRACT HQS INSPECTION</u></p> <p>10.3.1 Timely Pre-Contract HQS Inspection</p> <p>The family and the owner will submit a RFTA and other documents as required by HABC that must include:</p> <ul style="list-style-type: none"> • Lead certificate (on units built pre-1978); • MDE Certification; • Baltimore City Rental certification / Property Registration; and • An owner/agent self-certification stating that the owner is aware of HABC housing quality standards, that the owner/agent has inspected the unit and that the unit meets HABC housing quality standards. 	<p>10-5</p>	<p>Removing and adding sentences to clarify documents required prior to an initial inspection:</p> <p>10.3.1 Timely Pre-Contract HQS Inspection (<i>Initial Inspection</i>)</p> <p>The family and the owner will submit a RFTA and other documents as required by HABC that must include:</p> <ul style="list-style-type: none"> • Lead certificate (on units built pre-1978); • MDE Certification; • Baltimore City Rental certification / Property Registration; and • An owner/agent self-certification stating that the owner is aware of HABC housing quality standards, that the owner/agent has inspected the unit and that the unit meets HABC housing quality standards <i>All other required documentation (see Chapter 9, Section 9.4.1).</i>
<p><u>10.3 PRE-CONTRACT HQS INSPECTION</u></p> <p>10.3.1 Timely Pre-Contract HQS Inspection</p> <p>...</p> <p>HABC will inspect the unit and determine whether the unit satisfies HABC’s housing quality standards within fifteen (15) calendar days of the latter of the</p>	<p>10-13</p>	<p>Revising sentence to clarify actual procedures:</p> <p>HABC will inspect the unit and determine whether the unit satisfies HABC’s housing quality standards within fifteen (15) calendar days of the latter of the date of approval for rent reasonableness or the date of the owner’s certification that the unit meets housing quality standards <i>RFTA submission and the receipt of all required documents from the owner, as mentioned</i></p>

FY2017 HCVP Admin Plan	Page	FY2018 HCVP Admin Plan AMENDMENTS
CURRENT POLICY	#	PROPOSED POLICY

<p>date of approval for rent reasonableness or the date of the owner’s certification that the unit meets housing quality standards. ...</p>		<p><i>above.</i> ... Adding a sentence to the end of this section 10.3.1: <i>If the unit is not ready at the time of the initial inspection, the voucher holder will be given a new RFTA to find another unit.</i></p>
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Chapter 10: Housing Quality Standards and Inspections (Continued)

<p><u>10.4 SCHEDULED INSPECTIONS</u></p> <p>10.4.2 Self-Certification for Owners ...</p> <p>HABC will determine, based on the type of deficiency, if a unit is eligible for self-certification. Health and safety violations will not be considered for self-certification. HABC will notify the owner if the unit is found eligible, and offer the owner the opportunity to self-certify.</p> <p>Units that are not under contract will not be eligible for self-certification until their first post contract annual inspection.</p> <p>If eligible, a Self-Certification Form will be mailed with the Inspection Summary to the owner of the unit, who will be responsible for obtaining the appropriate signatures (i.e. of the landlord/owner or designated representative and of the Tenant on Record) and sending the completed form back to HABC within five (5) business days of the re-inspection date... ...</p>	<p>10-6</p>	<p>Revising policy to clarify that owners must request self-certification:</p> <p>HABC will determine, based on the type of deficiency, if a unit is eligible for self-certification. Health and safety violations will not be considered for self-certification. <u>Units that are not under contract will not be eligible for self-certification until their first post contract annual inspection.</u></p> <p>HABC will notify the owner if the unit is found eligible, and offer the owner the opportunity to self-certify. Owners must download the HQS Self-Certification Form through the Landlord Portal or by visiting www.BaltimoreHousing.org and clicking on the HCVP quick link, then Frequently Requested Policies/Forms, and then clicking on item number two (2) for the Self-Certification of HQS Inspection Form.</p> <p>Units that are not under contract will not be eligible for self-certification until their first post contract annual inspection.</p> <p>If eligible, a Self-Certification Form will be mailed with the Inspection Summary to the owner of the unit, who will be responsible for obtaining the appropriate signatures (i.e. of the landlord/owner or designated representative and of the Tenant on Record) and sending The completed form must be sent to and received by back to HABC within five (5) business days of the re-inspection date...</p>
<p><u>10.5 MOVE-OUT / VACATE</u></p> <p>A move out inspection will be performed only at the landlords request to document tenant damages.</p>	<p>10-10</p>	<p>Adding sentence to establish timeframe for requests of this type:</p> <p><i>This type of inspection must be requested within thirty (30) calendar days of the participant’s move-out date.</i></p>
<p><u>10.8 EMERGENCY REPAIR ITEMS</u></p> <p>The following items are considered of an emergency nature...:</p> <ul style="list-style-type: none"> • ... • Inoperable smoke detectors / carbon monoxide detectors 	<p>10-10</p>	<p>Adding two types of emergency repair items:</p> <ul style="list-style-type: none"> • <i>Rat infestations</i> • <i>Unsecure or broken exterior doors or windows</i>
<p><u>10.9 CONSEQUENCES OF OWNER IS RESPONSIBLE (NON-EMERGENCY ITEMS)</u></p> <p>10.9.3 Self-Certification by Owner</p> <p>HABC will allow owners in good standing with HABC (an owner in good standing is one whose units consistently meet inspection standards) to self-</p>	<p>10-11</p>	<p>Revising section to refer to Section 10.4.2 and clarify that owners must request self-certifications:</p> <p>HABC will allow owners in good standing with HABC (an owner in good standing is one whose units consistently meet inspection standards) to <i>request to</i> self-certify all minor non-health and safety violations have been corrected. Units that are not under contract will not be eligible for self-certification until</p>

FY2017 HCVP Admin Plan CURRENT POLICY	Page #	FY2018 HCVP Admin Plan AMENDMENTS PROPOSED POLICY
--	-----------	--

<p>certify all minor non-health and safety violations have been corrected. Units that are not under contract will not be eligible for self-certification until their first post-contract annual inspection...</p>		<p>their first post-contract annual inspection. <i>For more information on self-certification, please refer back to Section 10.4.2 of this Chapter...</i></p> <p>Removed the rest of this section.</p>
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Chapter 10: Housing Quality Standards and Inspections (Continued)

<p><u>10.10 DETERMINATION OF RESPONSIBILITY</u></p> <p>The owner is responsible for all HQS violations.</p>	<p>10-12</p>	<p>Adding sentence to clarify that participant's must allow owner access to make HQS repairs to their units or risk termination:</p> <p><i>Failure to allow owner's access to the assisted unit to make HQS repairs as cited by HABC is a violation of Family Obligations and may result in referral for termination of participation in the HCV Program.</i></p>
<p><u>10.11 CONSEQUENCES IF FAMILY IS RESPONSIBLE</u></p> <p>If emergency violations of housing quality standards are determined to be the responsibility of the family, HABC will require the landlord to make repair(s) or the family to make correction(s) within twenty-four (24) hours. If non-emergency violations of HQS are determined to be the responsibility of the family, HABC will require the landlord make any repair(s) or the family to make corrections within thirty (30) calendar days...</p>	<p>10-13</p>	<p>Add statement clarifying family responsibility on 24hr notices:</p> <p>If emergency violations of housing quality standards are determined to be the responsibility of the family, HABC will require <i>either</i> the landlord to make repair(s) or the family to make <i>repair(s) and/or</i> correction(s) within twenty-four (24) hours. <i>If the emergency repair items are not corrected in the time period required by HABC and it is an HQS breach that is a family obligation, HABC may terminate the assistance to the family.</i></p> <p>If non-emergency violations of HQS are determined to be the responsibility of the family, HABC will require the landlord make any repair(s) or the family to make corrections within thirty (30) calendar days...</p>
<p><u>10.12 INSPECTION RULES, PROCEDURES AND FORMS</u></p> <p>10.12.1 Self-Certification by Owner</p> <p>HABC will allow owners in good standing with HABC (an owner in good standing is one whose units consistently meet inspection standards) to self-certify all minor non-health and safety violations have been corrected...</p>	<p>10-13</p>	<p>Revising section to refer to Section 10.4.2 and clarify that owners must request self-certifications:</p> <p>HABC will allow owners in good standing with HABC (an owner in good standing is one whose units consistently meet inspection standards) to <i>request to</i> self-certify all minor non-health and safety violations have been corrected. Units that are not under contract will not be eligible for self-certification until their first post-contract annual inspection. <i>For more information on self-certification, please refer back to Section 10.4.2 of this Chapter...</i></p> <p>Removed the rest of this section.</p>
<p><u>10.12 INSPECTION RULES, PROCEDURES AND FORMS</u></p> <p>10.12.2 Winter Waiver</p> <p>...Owners that are granted a Winter Waiver will receive a letter scheduling the date that the unit will be re-inspected for proper correction of the deficiency. The letters will be mailed two (2) weeks prior to the inspection date. If there is no re-inspection scheduled, owners will be required to self-certify that HQS requirements have been met...</p>	<p>10-13</p>	<p>Removing last sentence (re-inspections will be scheduled unless owner requests to self-certify) and adding paragraph to clarify procedure for requesting Winter Waivers:</p> <p>...Owners that are granted a Winter Waiver will receive a letter scheduling the date that the unit will be re-inspected for proper correction of the deficiency. The letters will be mailed two (2) weeks prior to the inspection date. If there is no re-inspection scheduled, owners will be required to self-certify that HQS requirements have been met...</p> <p><i>Winter Waivers may be requested by downloading the Request for</i></p>

FY2017 HCVP Admin Plan CURRENT POLICY	Page #	FY2018 HCVP Admin Plan AMENDMENTS PROPOSED POLICY
--	-----------	--

		<i>Winter Waiver form online. Please go to www.BaltimoreHousing.org and click on the HCVP quick link, then on Frequently Requested Policies/Forms, and downloading item number four (4), Winter Waiver Request Form. This form can also be located on the Landlord Portal. The completed form must be submitted to HABC prior to the re-inspection date.</i>
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Chapter 11: Owner Rents, Rent Reasonableness and Payment Standards

<p><u>11.7 REQUEST FOR ANNUAL RENT ADJUSTMENTS</u></p> <p>The rent adjustment amount will be determined using the published U.S. Bureau of Labor Statistics Consumer Price Index (CPI), for rental housing in the Baltimore area. The CPI will be used for single-family dwelling properties. However, for multi-family dwelling properties, either the CPI or the 75th percentile (a methodology which calculates the 75th percentile) from the multi-family rent roll submitted for each unit bedroom size (e.g. 1-, 2-, 3-bedrooms, etc.) will be used.</p>	<p>11-5 To 11-6</p>	<p>Revising paragraph to use AAFs:</p> <p>The rent adjustment amount <i>for rental housing in the Baltimore area may</i> be determined using the published U.S. Bureau of Labor Statistics Consumer Price Index (CPI) Annual Adjustment Factor (AAF) and/or other factors depending on available funding, for rental housing in the Baltimore area. The CPI AAF will be used for single-family dwelling properties. However, for multi-family dwelling properties, either the CPI AAF or the 75th percentile (a methodology which calculates the 75th percentile) from the multi-family rent roll submitted for each unit bedroom size (e.g. 1-, 2-, 3-bedrooms, etc.) will be used.</p>
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Chapter 12: Re-Examinations

<p><u>12.2 BIENNIAL REEXAMINATIONS</u></p> <p>12.2.4 Failure to respond to Notification of Reexamination</p> <p>...If the household fails to attend the reexamination appointment, the termination process will commence. In order to stop the termination process, the household will need to attend a second scheduled appointment to complete the reexamination. This second appointment will be scheduled approximately seven (7) days after the date of the first NO SHOW appointment. Written notification will be sent to the household.</p> <p>If the household fails to keep the second scheduled appointment, HABC will send the household a notice of termination and offer an opportunity to appeal this decision through an informal hearing. A copy of the termination notice will be sent to the owner/agent...</p>	<p>12-2</p>	<p>Clarifying the process:</p> <p>...If the household fails to attend the <i>initial</i> reexamination appointment, <i>a second reexamination appointment will be scheduled. This second appointment will be scheduled approximately seven (7) calendar days after the date of the first NO SHOW appointment. Written notification will be sent to the household.</i></p> <p><i>If the household fails to attend the second scheduled reexamination appointment, the termination process will commence. <u>HABC will send the household a notice of termination and offer an opportunity to appeal this decision through an informal hearing. A copy of the termination notice will be sent to the owner/agent.</u> In order to stop the termination process, the household will need to attend a second scheduled appointment to complete the reexamination. This second appointment will be scheduled approximately seven (7) days after the date of the first NO SHOW appointment. Written notification will be sent to the household.</i></p>
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FY2017 HCVP Admin Plan CURRENT POLICY	Page #	FY2018 HCVP Admin Plan AMENDMENTS PROPOSED POLICY
--	-----------	--

		<p>If the household fails to keep the second scheduled appointment, HABC will send the household a notice of termination and offer an opportunity to appeal this decision through an informal hearing. A copy of the termination notice will be sent to the owner/agent...</p>
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Chapter 12: Re-Examinations (Continued)

<p><u>B. INTERIM REEXAMINATIONS</u></p> <p><u>Income Reexamination Prompted by Zero Income Household Status</u></p> <p>An interim reexamination will be completed every one hundred twenty (120) days for households reporting zero income...</p>	<p>12-4 To 12-7</p>	<p>Section Letter changed from “B” to “12.3”</p> <p>Sub-Section labeled “12.3.7”</p> <p>An interim reexamination <i>review</i> will be completed every one hundred twenty (120) <i>calendar</i> days for households reporting zero income.</p>
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Chapter 13: Moves with Continued Assistance / Portability

<p><u>13.2 ALLOWABLE MOVES</u></p> <p>A family may move to a new unit with continued assistance if:</p> <ul style="list-style-type: none"> The assisted lease for the unit has terminated because HABC has terminated the HAP Contract for owner breach, or the lease was terminated by mutual agreement of the owner and the family. Subject to the provisions of Chapter 15, Section 15.5 of this Plan, the owner has given the family a notice to vacate, or has commenced an action to evict the tenant. Additionally, if the owner has obtained a court judgement or other process allowing the owner to evict the family (unless assistance to the family will be terminated). The family has given proper notice of lease termination (and if the family has a right to terminate the lease on notice to the owner). 	<p>13-1</p>	<p>Revising the sentence to clarify current HCVP policy:</p> <p>A family may move to a new unit with continued assistance if:</p> <ul style="list-style-type: none"> The assisted lease for the unit has <i>been terminated by because</i> <ul style="list-style-type: none"> HABC has terminated the for owner breach HAP Contract, or the lease was terminated by Mutual agreement of the owner and the family. Subject to the provisions of Chapter 15, Section 15.5 of this Plan, the owner has given the family a notice to vacate, or has commenced an action to evict the tenant. Additionally, if the owner has obtained a court judgement or other process allowing the owner to evict the family (unless assistance to the family will be terminated). The family has given proper notice of lease termination (and if the family has a right to terminate the lease on notice to the owner <i>and is in good standing while following proper procedures as described in this Chapter</i>).
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<p><u>13.3 RESTRICTIONS ON MOVES</u></p> <p>The following are restrictions on moves:</p> <ul style="list-style-type: none"> Families will not be permitted to move during the initial year of assisted occupancy. Families will not be permitted to move more than once in a 12-month period. HABC will deny permission to move if there is insufficient funding for continued assistance. 	<p>13-1</p>	<p>Adding restriction on move that was not previously mentioned but always part of policy:</p> <p>The following are restrictions on moves:</p> <ul style="list-style-type: none"> Families will not be permitted to move during the initial year term of assisted occupancy the lease. Families will not be permitted to move more than once in a 12-month period, <i>unless otherwise specified by HABC</i>. <i>Families who are pending court resolutions (documentation must be received by HABC verifying that court procedures have commenced).</i>
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FY2017 HCVP Admin Plan CURRENT POLICY	Page #	FY2018 HCVP Admin Plan AMENDMENTS PROPOSED POLICY
--	-----------	--

		<ul style="list-style-type: none"> HABC <i>may</i> deny permission to move if there is insufficient funding for continued assistance.
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Chapter 13: Moves with Continued Assistance / Portability (Continued)

<p><u>13.3 RESTRICTIONS ON MOVES</u></p> <p>...The HABC will deny permission to move if:</p> <ul style="list-style-type: none"> The family has violated a family obligation. The family owes HABC money. The family has moved within the previous 12 months. <p>The Deputy Chief of the Housing Choice Voucher Program may make exceptions to these restrictions if there is an emergency reason for the move over which the participant has no control.</p>	13-1	<p>Revising language to clarify current HCVP policy:</p> <p>...The HABC will <i>may</i> deny permission to move if:</p> <ul style="list-style-type: none"> The family has violated a family obligation. The family owes HABC money. The family has moved within the previous 12 months. <p>The Deputy Chief <i>or designee</i> of the Housing Choice Voucher HCV Program may make exceptions to these restrictions if there is an emergency reason for the move over which the participant has no control.</p>
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<p><u>13.4 PROCEDURE FOR MOVES</u></p> <p>13.4.2 Notice Requirements</p> <p>...The family must give the owner the required number of days' written notice of intent to vacate specified in the lease and must give a copy to HABC simultaneously.</p>	13-2	<p>Revising language to clarify current HCVP policy:</p> <p>...The family must <i>follow HABC's Notice of Intent to Vacate procedures and specify a move-out date that should be up to no more than 60-days from the date of notice to the owner.</i> <i>Participants must</i> give the owner the required number of days' written notice of intent to vacate, <i>as</i> specified in the lease and must give a copy to HABC simultaneously.</p>
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FY2017 HCVP Admin Plan CURRENT POLICY	Page #	FY2018 HCVP Admin Plan AMENDMENTS PROPOSED POLICY
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Chapter 13: Moves with Continued Assistance / Portability (Continued)

<p><u>13.5 PORTABILITY</u></p> <p>13.5.1 Outgoing Portability (Port-Outs)</p> <p>Port-out households must meet all criteria set forth by the receiving PHA.</p>	<p>13-2</p>	<p>Adding subsections 13.5.1.1-13.5.1.3 to maintain compliance with HUD regulations and clarify current HCV policy.</p> <p><i>13.5.1.1 Determining HCV Program Eligibility for Applicant Families Requesting to Port-Out</i> Port-out households Applicant families requesting to port-out of HABC's jurisdiction must meet all criteria set forth by the receiving PHA HABC. HABC will determine if the applicant is eligible for participation in the HCV Program, and whether the applicant is income eligible in the jurisdiction for which the applicant wishes to move. If the applicant family meets all HCV eligibility criteria but is not income eligible in the area to which the family wishes to move, HABC will inform the family they may not move to that area with continued assistance. However, the applicant family may lease a unit in HABC's jurisdiction if the family remains eligible for HCV assistance (including income eligible) in HABC's jurisdiction.</p> <p><i>13.5.1.2 Determining HCV Program Eligibility for Participant Families Requesting to Port-Out</i> Once a participant family informs HABC of their desire to move under portability and where they want to move to, HABC determines the family's eligibility to move. A family's eligibility to move is determined in accordance with 24 CFR § 982.353, 24 CFR § 982.354, and with policies as stated in this HCVP Administrative Plan.</p> <p><i>If more than one PHA administers a voucher program in the area to which the family is moving, the family must select the receiving PHA. HABC must provide the family with the contact information for all of the receiving PHAs that serve the area.</i></p> <p><i>13.5.1.3 Port-Out Voucher Issuance</i> Once the portability request is approved, HABC will issue the family a voucher. If not already done so, HABC will advise the family to contact the receiving PHA and request assistance by providing the name, telephone number and email address of the receiving PHA's staff that are responsible for working with incoming portability families. HABC will also notify the receiving PHA to expect the incoming family. This process may have already been completed during the initial contact with the receiving PHA.</p>
<p><u>13.5 PORTABILITY</u></p> <p>13.5.2 Incoming Portability (Port-Ins)</p>	<p>13-2</p>	<p>Removing this HCVP policy as per HUD regulations as stated in PIH Notice 2016-09. "The receiving PHA cannot refuse to assist an incoming family or direct them to a neighboring PHA for assistance..."</p>

FY2017 HCVP Admin Plan CURRENT POLICY	Page #	FY2018 HCVP Admin Plan AMENDMENTS PROPOSED POLICY
--	-----------	--

...If the family’s income is such that a \$0 subsidy amount is determined prior to lease up in HABC’s jurisdiction, HABC will refuse to enter into a contract on behalf of the family.		... If the family’s income is such that a \$0 subsidy amount is determined prior to lease up in HABC’s jurisdiction, HABC will refuse to enter into a contract on behalf of the family.
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Chapter 13: Moves with Continued Assistance / Portability (Continued)

<p><u>13.5 PORTABILITY</u></p> <p>13.5.3 Restrictions on Portability</p> <p>13.5.3.1 Participants The restrictions on portability are the same as those listed for moves (see Section 13.3, RESTRICTIONS ON MOVES, above).</p> <p>13.5.3.2 Applicants If neither the head nor spouse had a domicile (legal residence) in HABC’s jurisdiction at the date of their initial application for assistance, the family will not be permitted to exercise portability upon initial issuance of a voucher, unless the receiving PHA absorbs such a move.</p> <p>13.5.3.3 Exception In compliance with the 2005 VAWA...</p>	<p>13-2</p>	<p>Revising and removing HCVP policy as per HUD regulations as stated in PIH Notice 2016-09. “The receiving PHA cannot refuse to assist an incoming family or direct them to a neighboring PHA for assistance...”</p> <p>13.5.3.1 Applicants and Participants The restrictions on portability are the same as those listed for moves (see Section 13.3, RESTRICTIONS ON MOVES, above).</p> <p>13.5.3.2 Applicants If neither the head nor spouse had a domicile (legal residence) in HABC’s jurisdiction at the date of their initial application for assistance, the family will not be permitted to exercise portability upon initial issuance of a voucher, unless the receiving PHA absorbs such a move.</p> <p>Adding “sexual assault” and updating language to match that of the 2013 VAWA Reauthorization Act:</p> <p>13.5.3.3 Exception under the Violence against Women Act (VAWA) In compliance with the 2005 VAWA...</p>
<p><u>13.5 PORTABILITY</u></p> <p>13.5.4 Requests for Tenancy Approval</p> <p>When the family submits a Request for Tenancy Approval, it will be processed using HABC’s policies. A briefing will be mandatory for all porting families.</p> <p>If the family does not submit a Request for Tenancy Approval, or does not execute a lease, the originating PHA will be notified within five (5) business days or as indicated in the reciprocal agreement of the event by HABC.</p> <p>If the family leases up successfully, HABC will notify the initial PHA within fourteen (14) calendar days.</p> <p>HABC will notify the initial PHA if the family fails to submit a request for approval of tenancy for an eligible unit within the term of the voucher.</p> <p>If HABC denies assistance to the family, the PHA will notify the originating PHA and the family will be offered a review or hearing. HABC will notify</p>	<p>13-3</p>	<p>Revising this HCVP policy as per HUD regulations as stated in PIH Notice 2016-09. “The receiving PHA cannot refuse to assist an incoming family or direct them to a neighboring PHA for assistance...”</p> <p>13.5.4 Requests for Tenancy Approval (RFTA) When the family submits a Request for Tenancy Approval RFTA, it will be processed using HABC’s policies. A briefing will be mandatory for all porting portable families.</p> <p>If the family does not submit a Request for Tenancy Approval RFTA, or does not execute a lease, the originating initial PHA will be notified within five (5) business days or as indicated in the reciprocal agreement of the event by HABC and the family will be referred back to the initial PHA. The voucher of record for the family is once again the voucher originally issued by the initial PHA, and the initial PHA’s policies apply.</p> <p>If the family leases up successfully, HABC will notify the initial PHA within fourteen (14) calendar days.</p> <p>HABC will notify the initial PHA if the family has leased an eligible unit under the program, or if the family fails to submit a Request for Tenancy Approval RFTA for an eligible unit within the term of the voucher.</p>

FY2017 HCVP Admin Plan CURRENT POLICY	Page #	FY2018 HCVP Admin Plan AMENDMENTS PROPOSED POLICY
--	-----------	--

the family of its responsibility to contact the initial PHA if the family wishes to move somewhere other than HABC's jurisdiction.		If HABC denies assistance to the family, the PHA HABC will notify the originating initial PHA and the family will be offered an <i>informal</i> review or hearing. HABC will notify the family of its responsibility to contact the originating initial PHA if the family wishes to move somewhere other than HABC's jurisdiction.
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Chapter 13: Moves with Continued Assistance / Portability (Continued)

<p><u>13.5 PORTABILITY</u></p> <p>13.5.5 Required Documents</p> <p>As receiving PHA, HBAC will require documents as listed in the reciprocal agreement from the originating PHA.</p>	13-4	<p>Revising this HCVP policy as per HUD regulations as stated in PIH Notice 2016-09. "The receiving PHA cannot refuse to assist an incoming family or direct them to a neighboring PHA for assistance..."</p> <p>As receiving PHA, HBAC will require documents <i>as required by HUD and this Administrative Plan, or</i> as listed in the reciprocal agreement from the originating initial PHA.</p>
<p><u>13.5 PORTABILITY</u></p> <p>13.5.6 Billing Procedures</p> <p>It is HABC's intention to absorb all existing port-ins. Until that time, for non-absorbed port-ins, HABC as the receiving PHA, will bill the initial PHA monthly for housing assistance payments...</p>	13-5	<p>Revising this HCVP policy as per HUD regulations as stated in PIH Notice 2016-09. "The receiving PHA cannot refuse to assist an incoming family or direct them to a neighboring PHA for assistance..."</p> <p>It is HABC's intention to absorb all existing port-ins. Until that time, For non-absorbed port-ins, HABC as the receiving PHA, will bill the initial PHA monthly for housing assistance payments...</p>

Chapter 14: Contract Terminations

<p><u>C. TERMINATION OF TENANCY BY THE OWNER: EVICTIONS</u></p> <p><u>Evidence of Criminal Activity</u></p> <p>The owner may terminate tenancy and evict by judicial action a family for criminal activity by a covered person if the owner determines they have engaged in the criminal activity:</p> <ul style="list-style-type: none"> Based on conviction By satisfying the standard of proof used for a criminal conviction... 	14-1	<p>Section Letter changed from "C" to "14.4" and sub-section labeled "14.4.1."</p> <p>PIH Notice 2015-19 and corresponding FAQs published in, HABC took the notice to mean using conviction records only. However, clarification from HUD and OLA has presented the option to revert language back to include arrest records, especially when a conviction is not present or available.</p> <p>Chapter 14 refers to Contract Terminations by Owners – HABC has no control over the owner's decision to terminate.</p> <p>14.4.1 Evidence of Criminal Activity</p> <p>...</p> <ul style="list-style-type: none"> Based on <i>Regardless of arrest or</i> conviction By <i>Without</i> satisfying the standard of proof used for a criminal conviction...
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Chapter 15: Denial or Termination of Assistance

<p><u>15.2 GROUNDS FOR DNEIAL/TERMINATON</u></p> <p>15.2.1 Form of Denial/Termination</p> <p>...Termination of assistance for a participant may include any or all of the following:</p> <ul style="list-style-type: none"> Refusing to enter into a HAP Contract or 	15-1	<p>Adding language to clarify current procedures:</p> <p>...</p> <ul style="list-style-type: none"> Refusing to enter into a <i>new</i> HAP Contract or approve a <i>new</i> tenancy <i>while in a move process</i>; Terminating housing assistance payments under an outstanding HAP contract;
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FY2017 HCVP Admin Plan CURRENT POLICY	Page #	FY2018 HCVP Admin Plan AMENDMENTS PROPOSED POLICY
--	-----------	--

<p>approve a tenancy;</p> <ul style="list-style-type: none"> Terminating housing assistance payments under an outstanding HAP contract; Refusing to process or provide assistance under portability procedures. 		<ul style="list-style-type: none"> Refusing to process or provide assistance under portability procedures.
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Chapter 15: Denial or Termination of Assistance (Continued from previous section)

<p><u>15.2 GROUNDS FOR DNEIAL/TERMINATON</u></p> <p>15.2.2 Mandatory Denial and Termination</p> <p>HABC must deny assistance to applicants and terminate assistance to participants if the family is under contract and one hundred and eighty (180) calendar days (or 12 months depending on the HAP contract used) have elapsed since the last housing assistance payment was made by HABC...</p> <p>HABC must permanently deny admission to the program for applicants and terminate assistance for program participants if HABC determines that any household member is currently engaging in illegal use of a drug.</p> <p>HABC may deny admission to the program for applicants and terminate assistance for program participants if HABC determines that it has reasonable cause to believe that a household member is engaging in illegal drug use or a pattern of illegal drug use that may threaten the health, safety or right to peaceful enjoyment of the premises by other residents.</p> <p>HABC must permanently deny admission to an applicant if HABC determines that any member of the household is subject to a lifetime registration requirement under a State sex offender registration program. See section 15.2 of this Chapter for HABC's established standards regarding criminal background investigation and determining whether a member of the household is subject to a lifetime registration requirement under a State sex offender registration program.</p> <p>HABC must terminate program assistance for a family evicted from housing assisted under the program for serious violation of the lease.</p>	<p>15-1 To 15-2</p>	<p>Revising section to reflect MANDATORY denial/termination:</p> <p>HABC must permanently deny admission to an applicant if HABC determines that any member of the household is subject to a lifetime registration requirement under a State sex offender registration program. See section 15.2 of this Chapter for HABC's established standards regarding criminal background investigation and determining whether a member of the household is subject to a lifetime registration requirement under a State sex offender registration program.</p> <p>HUD regulations at 4 CFR § 5.856, 960.204(a)(4), and 982.553(a)(2) prohibit admission after June 25, 2001, if any member of a household is subject to a State lifetime sex offender registration requirement. This regulation reflects a statutory prohibition. A household receiving assistance with such a member is receiving assistance in violation of federal law.</p> <p>HABC must immediately terminate program assistance for a family if HABC determines that any member of the household is subject to a lifetime registration requirement under a State sex offender registration program.</p> <p>If a participant who is subject to such a lifetime registration requirement was erroneously admitted into a federal housing program after June 25, 2001 and is found to be receiving housing assistance, the PHA must immediately pursue eviction or termination of assistance for these participants.</p> <p>HABC must deny admission to the program for an applicant or terminate program assistance for a participant if any member of the family fails to sign and submit consent forms for obtaining required information.</p> <p>HABC must deny admission or terminate assistance when required under the regulations for failure to establish citizenship or eligible immigration status.</p> <p>HABC must deny assistance to applicants and terminate assistance to participants if the family is under contract and one hundred and eighty (180) calendar days (or 12 months depending on the HAP contract used) have elapsed since the last housing assistance payment was made by HABC...</p>
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FY2017 HCVP Admin Plan CURRENT POLICY	Page #	FY2018 HCVP Admin Plan AMENDMENTS PROPOSED POLICY
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Chapter 15: Denial or Termination of Assistance (Continued from previous section)

<p>HUD regulations at 4 CFR § 5.856, 960.204(a)(4), and 982.553(a)(2) prohibit admission after June 25, 2001, if any member of a household is subject to a State lifetime sex offender registration requirement. This regulation reflects a statutory prohibition. A household receiving assistance with such a member is receiving assistance in violation of federal law.</p> <p>HABC must immediately terminate program assistance for a family if HABC determines that any member of the household is subject to a lifetime registration requirement under a State sex offender registration program.</p> <p>If a participant who is subject to such a lifetime registration requirement was erroneously admitted into a federal housing program after June 25, 2001 and is found to be receiving housing assistance, the PHA must immediately pursue eviction or termination of assistance for these participants.</p> <p>HABC must deny admission to the program for an applicant or terminate program assistance for a participant if any member of the family fails to sign and submit consent forms for obtaining required information.</p> <p>HABC must deny admission or terminate assistance when required under the regulations for failure to establish citizenship or eligible immigration status.</p>	<p>15-1 TO 15-2</p>	<p>HABC must terminate program assistance for a family evicted from housing assisted under the program for serious violation of the lease.</p> <p>HABC may permanently deny admission to the program for applicants and terminate assistance for program participants if HABC determines that any household member is currently engaging in illegal use of a drug.</p> <p>HABC may deny admission to the program for applicants and terminate assistance for program participants if HABC determines that it has reasonable cause to believe that a household member is engaging in illegal drug use or a pattern of illegal drug use that may threaten the health, safety or right to peaceful enjoyment of the premises by other residents.</p> <p>HABC must permanently deny admission to an applicant if HABC determines that any member of the household is subject to a lifetime registration requirement under a State sex offender registration program. See section 15.2 of this Chapter for HABC's established standards regarding criminal background investigation and determining whether a member of the household is subject to a lifetime registration requirement under a State sex offender registration program.</p> <p>HABC must terminate program assistance for a family evicted from housing assisted under the program for serious violation of the lease.</p> <p>HUD regulations at 4 CFR § 5.856, 960.204(a)(4), and 982.553(a)(2) prohibit admission after June 25, 2001, if any member of a household is subject to a State lifetime sex offender registration requirement. This regulation reflects a statutory prohibition. A household receiving assistance with such a member is receiving assistance in violation of federal law.</p> <p>HABC must immediately terminate program assistance for a family if HABC determines that any member of the household is subject to a lifetime registration requirement under a State sex offender registration program.</p> <p>If a participant who is subject to such a lifetime registration requirement was erroneously admitted into a federal housing program after June 25, 2001 and is found to be receiving housing assistance, the PHA must immediately pursue eviction or termination of assistance for these participants.</p> <p>HABC must deny admission to the program for an applicant or terminate program assistance for a participant if any member of the family fails to sign and submit consent forms for obtaining required information.</p>
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FY2017 HCVP Admin Plan	Page	FY2018 HCVP Admin Plan AMENDMENTS
CURRENT POLICY	#	PROPOSED POLICY

		HABC must deny admission or terminate assistance when required under the regulations for failure to establish citizenship or eligible immigration status.
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Chapter 15: Denial or Termination of Assistance (Continued)

<p>15.2.3 Grounds for Denial or Termination of Assistance</p> <p>HABC may deny program assistance for an applicant, or terminate program assistance for a participant, if any member of the family...</p>	15-6	<p>Moving language from Mandatory section to this section (items were not indicative of mandatory denial/termination):</p> <p><i>HABC may deny admission to the program for applicants and terminate assistance for program participants if HABC determines that any household member is currently engaging in illegal use of a drug. See Chapter 15.2 of this chapter for HABC established standards.</i></p> <p><i>HABC may deny admission to the program for applicants and terminate assistance for program participants if HABC determines that it has reasonable cause to believe that a household member is engaging in illegal drug use or a pattern of illegal drug use that may threaten the health, safety or right to peaceful enjoyment of the premises by other residents. See Section 15.3 of this chapter for HABC established standards.</i></p>
<p><u>A. GROUNDS FOR DENIAL/TERMINATION</u></p> <p><u>Grounds for Denial or Termination of Assistance</u></p> <p>The HABC will deny program assistance for an applicant, or terminate program assistance for a participant, if any member of the family:</p> <p>...</p> <ul style="list-style-type: none"> • Has been evicted from federally assisted housing in the last three years. • ... 	15-6	<p>Section Letter changed from “A” to “15.2” and sub-section labeled “15.2.3”</p> <p>15.2.3 Grounds for Denial or Termination</p> <p>The HABC will <i>may</i> deny program assistance for an applicant, or terminate program assistance for a participant, if any member of the family:</p> <ul style="list-style-type: none"> • Has been evicted from federally assisted housing in the last three <i>five</i> years. <p>Updated to match 24 CFR § 982.552(c) (1) (ii).</p>
<p><u>15.3 SCREENING AND TERMINATION FOR DRUG ABUSE AND OTHER CRIMINAL ACTIVITY</u></p> <p>15.3.6 Drug Related and Violent Criminal Activity</p> <p>...However, the household may be admitted if after considering the individual circumstances of the household, HABC determines that the evicted household member who engaged in drug-related criminal activity has successfully completed a supervised drug rehabilitation program approved by HABC.</p> <p>Applicants will be denied assistance if they have</p>	15-7	<p>Revising language to clarify current HCVP policy:</p> <p>...However, the household may be admitted if after considering the individual circumstances of the household, HABC determines that the evicted household member who engaged in drug-related criminal activity has successfully completed a supervised drug rehabilitation program approved and provisional documentation is accepted <i>approved and provisional documentation is accepted</i> by HABC.</p> <p>Applicants will be denied assistance if they have been convicted/evicted from federally assisted housing for violent drug-related <i>violent drug-related</i> criminal activity within the last three (3) years prior to the date of the certification eligibility <i>certification eligibility</i> interview.</p>

FY2017 HCVP Admin Plan	Page	FY2018 HCVP Admin Plan AMENDMENTS
CURRENT POLICY	#	PROPOSED POLICY

<p>been convicted/evicted from federally assisted housing for violent criminal activity within the last three (3) years prior to the date of the certification interview.</p>		
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Chapter 15: Denial or Termination of Assistance (Continued)

<p><u>B. SCREENING AND TERMINATION FOR DRUG ABUSE AND OTHER CRIMINAL ACTIVITY</u></p> <p><u>Screening of Applicants</u></p> <p>Revised language to match ACOP. No change in procedure, only one addition to policy.</p>	<p>15-8</p>	<p>Section Letter changed from “B” to “15.3” and sub-section labeled “15.3.3”</p> <p>15.3.3 Screening of Applicants <i>for Criminal Activity</i></p> <p>Last paragraph added as new: <i>If the criminal background check identifies a pending criminal investigation or charge, HABC will suspend an eligibility determination. HABC will inform the applicant that he/she may request reinstatement of the application within ninety (90) calendar days of the final disposition of the case, provided the disposition is not a conviction. If reinstatement of the application is not requested within 90 calendar days, the applicant will be withdrawn.</i></p>
<p><u>15.4 TERMINATION OF ASSISTANCE FOR PARTICIPANTS</u></p> <p>15.4.1 Termination of Assistance for Drug-related, Violent or Other Serious Criminal Activity</p> <p>... Assistance will be terminated for participants who have been convicted or evicted from a unit assisted under any federally assisted housing program for drug-related criminal activity, violent criminal activity or other serious criminal activity during participation in the program, and within the last three (3) years prior to the date of notice to terminate assistance. Families convicted/evicted from a federally assisted unit will be denied future assistance in accordance with HUD rules and regulations and this Administrative Plan...</p> <p>HABC may waive the requirement regarding drug-related criminal activity if the person has demonstrated successful completion of a credible rehabilitation program approved by HABC.</p>	<p>15-10</p>	<p>Revising language to clarify current HCVP policy:</p> <p>... Assistance will be terminated for participants who have been <i>arrested</i>, convicted or evicted from a unit assisted under any federally assisted housing program for drug-related criminal activity, violent criminal activity or other serious criminal activity during participation in the program, and within the last three (3) years prior to the date of notice to terminate assistance. <i>Families Household members arrested</i>/convicted/evicted from a federally assisted unit will be denied future assistance in accordance with HUD rules and regulations and this Administrative Plan...</p> <p>HABC may waive the requirement regarding drug-related criminal activity if the person has demonstrated successful completion of a credible rehabilitation program <i>approved and provisional documentation has been submitted to and accepted</i> by HABC.</p>
<p>15.4.2 Terminating Assistance for Alcohol Abuse by Household Members</p> <p>... Assistance will be terminated if a household member is convicted / incarcerated for any alcohol related criminal activity on or near the premises</p>	<p>15-10</p>	<p>Revising language to clarify current HCVP policy:</p> <p>... Assistance will <i>may</i> be terminated if a household member is <i>arrested</i> / convicted / incarcerated for any alcohol related criminal activity on or near the premises within any twelve (12) month period....</p>

FY2017 HCVP Admin Plan CURRENT POLICY	Page #	FY2018 HCVP Admin Plan AMENDMENTS PROPOSED POLICY
--	-----------	--

within any twelve (12) month period...		
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Chapter 15: Denial or Termination of Assistance (Continued)

<p><u>B. SCREENING AND TERMINATION FOR DRUG ABUSE AND OTHER CRIMINAL ACTIVITY</u></p> <p><u>Termination of Assistance for Participants</u></p> <p><u>Required Evidence</u></p> <p>...</p> <p>The HABC may terminate assistance for criminal activity by a household member, as described in this chapter, if HABC determines, based on a preponderance of evidence that the household member has engaged in the activity. This action will be taken regardless of whether the household member has been or convicted for such activity...</p>	15-11	<p>Sub-Section updated to New section “15.4” and sub-section labeled “15.4.4”</p> <p>15.4.4 Required Evidence</p> <p>...</p> <p>The HABC may terminate assistance for criminal activity by a household member, as described in this chapter, if the HABC determines, based on a preponderance of evidence that the household member has engaged in the criminal activity. This action will be taken regardless of whether the household member has been <i>arrested</i> or convicted for such activity...</p> <p>**PIH Notice 2015-19 and corresponding FAQs published in, HABC took the notice to mean using conviction records only. However, clarification from HUD and OLA has presented the option to revert language back to include arrest records, especially when a conviction is not present or available.</p>
<p>15.5.2 Enforcing Family Obligations</p> <p><i>15.5.2.6 When a Family Member Moves Out</i></p> <p>Families are required to notify HABC if any family member leaves the assisted household. When the family notifies HABC, they must furnish the following information:</p> <ul style="list-style-type: none"> • The date the family member moved out. • The new address, if known, of the family member. • A statement as to whether the family member is temporarily or permanently absent. 	15-12	<p>Revising/adding language to clarify current HCVP policy:</p> <p>Families are required to notify HABC <i>within thirty (30) calendar days</i>, if any family member leaves the assisted household. When the family notifies HABC, they must furnish the following information:</p> <ul style="list-style-type: none"> • The date the family member moved out. • The new address, if known, of the family member. • A statement as to whether the family member is temporarily or permanently absent. <p><i>If the above information cannot be provided, HABC may proceed with other verification procedures.</i></p>
<p>15.5.2 Enforcing Family Obligations</p> <p><i>15.5.2.10 Supportive Housing Program Referrals</i></p> <p>After twelve (12) months of participating in a transitional housing program (THP), THP participants may visit the office of HABC to request a tenant-based voucher...</p>	15-14	<p>Revising language to clarify current HCVP policy:</p> <p>After twelve (12) months of participating in a transitional housing program (THP), THP participants may visit the office of HABC to request a tenant-based voucher <i>permanent housing</i>...</p>
<p><u>15.6 ENFORCING FAMILY OBLIGATIONS</u></p>		<p>Revising language to clarify current HCVP policy:</p>

FY2017 HCVP Admin Plan CURRENT POLICY	Page #	FY2018 HCVP Admin Plan AMENDMENTS PROPOSED POLICY
--	-----------	--

<p>15.6.2 False or Incomplete Information</p> <p>...HABC will deny or terminate assistance based on the submission of false information or misrepresentation.</p>	15-17	...HABC will <i>may</i> deny or terminate assistance based on the submission of false information or misrepresentation.
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Chapter 15: Denial or Termination of Assistance (Continued)

<p><u>E. OPTION NOT TO TERMINATE FOR MISREPRESENTATION</u></p> <p>If the family has misrepresented any facts that caused the HABC to overpay assistance, the HABC may choose not to terminate and may offer to continue assistance provided that the family:</p> <ul style="list-style-type: none"> • Executes a Repayment Agreement within 30 calendar days and makes payments in accordance with the agreement • Or reimburses the HABC in full within 30 calendar days. 	15-17 to 15-18	<p>Section Letter changed from “E” to “15.8”</p> <p>If the family has misrepresented any facts that caused the HABC to overpay assistance, the HABC may choose not to terminate and may offer to continue assistance provided that the family either:</p> <ol style="list-style-type: none"> 1. Executes a Rep-Payment Agreement within <i>sixty (6030)</i> calendar days and makes payments in accordance with the agreement; or 2. Reimburses the HABC in full within <i>sixty (6030)</i> calendar days.
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<p><u>15.10 MISSED APPOINTMENTS AND DEADLINES</u></p> <p>...Appointments will be scheduled and time requirements will be imposed for the following events and circumstances:</p> <ul style="list-style-type: none"> • Eligibility for Admissions • Verification Procedures • Certificate/Voucher Issuance and Briefings • HQS and Inspections Re-Examinations • Scheduled Re-Examinations and Interim Re-examinations • Appeals <p>Medical or Family emergencies are acceptable reasons for missing appointments or failing to provide information by deadlines.</p>	15-18	<p>Revising language to clarify current HCVP policy:</p> <p>...Appointments will be scheduled and time requirements will be imposed for the following events and circumstances:</p> <ul style="list-style-type: none"> • Eligibility for Admissions; • Verification Procedures; • Certificate/Voucher Issuance and Briefings; • HQS and Inspections Re-Examinations; • Scheduled Re-Examinations and Interim Re-examinations; • Appeals; <i>and</i> • <i>Any other HABC appointments as scheduled</i> <p>Medical or <i>family</i> emergencies are <i>may be</i> acceptable reasons for missing appointments or failing to provide <i>required</i> information by deadlines; <i>however, HABC must be notified and supporting documentation may be required.</i></p>
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<p>15.10.1 Procedure when Appointments are Missed or Information not Provided</p> <p>For most purposes in this Plan, the family will be given two opportunities before being issued a notice of termination or denial for breach of a family obligation.</p>	15-18	<p>Revising language to clarify current HCVP policy:</p> <p>15.10.1 Procedure when Appointments are Missed or <i>Required</i> Information not Provided</p> <p>For most purposes in this Plan, the family will be given two opportunities <i>to attend the re-examination appointments</i> before being issued a notice of termination or denial for breach of a</p>
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FY2017 HCVP Admin Plan CURRENT POLICY	Page #	FY2018 HCVP Admin Plan AMENDMENTS PROPOSED POLICY
--	-------------------	--

<p><u>AGREEMENTS</u></p> <p>No Change to language.</p> <p>Adding chart of Payment Schedules.</p>	<p>to 17-5</p>	<p><i>Payment agreements will follow the schedule below:</i></p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: center;"><i>Initial Payment Due: (% of Total Amount)</i></th> <th style="text-align: center;"><i>Amount Owed</i></th> <th style="text-align: center;"><i>Maximum Term</i></th> </tr> </thead> <tbody> <tr> <td style="text-align: center;"><i>25%</i></td> <td style="text-align: center;"><i>0 - \$500</i></td> <td style="text-align: center;"><i>6 months</i></td> </tr> <tr> <td style="text-align: center;"><i>25%</i></td> <td style="text-align: center;"><i>\$501 - \$1,000</i></td> <td style="text-align: center;"><i>10 months</i></td> </tr> <tr> <td style="text-align: center;"><i>50%</i></td> <td style="text-align: center;"><i>\$1,001 - \$2,500</i></td> <td style="text-align: center;"><i>18 months</i></td> </tr> </tbody> </table>	<i>Initial Payment Due: (% of Total Amount)</i>	<i>Amount Owed</i>	<i>Maximum Term</i>	<i>25%</i>	<i>0 - \$500</i>	<i>6 months</i>	<i>25%</i>	<i>\$501 - \$1,000</i>	<i>10 months</i>	<i>50%</i>	<i>\$1,001 - \$2,500</i>	<i>18 months</i>
<i>Initial Payment Due: (% of Total Amount)</i>	<i>Amount Owed</i>	<i>Maximum Term</i>												
<i>25%</i>	<i>0 - \$500</i>	<i>6 months</i>												
<i>25%</i>	<i>\$501 - \$1,000</i>	<i>10 months</i>												
<i>50%</i>	<i>\$1,001 - \$2,500</i>	<i>18 months</i>												

Chapter 17: Owner or Family Debts to HABC (Continued)

<p><u>E. OWNER DEBTS TO HABC</u></p> <p>...If future housing assistance or claim payments are insufficient to reclaim the amounts owed, the HABC will:</p> <ul style="list-style-type: none"> • Require the owner to pay the amount in full within 30 days. • Pursue collections through the local court system. • Restrict the owner from future participation. 	<p>17-5</p>	<p>Section Letter changed from “E” to “17.6”</p> <p>If future housing assistance or claim payments are insufficient to reclaim the amounts owed, the HABC will:</p> <ul style="list-style-type: none"> • Require the owner to pay the amount in full within <i>sixty (30-60) days. An extension may be granted pending review and approval of the Deputy Chief or designee.</i> • Pursue collections through the local court system. • Restrict the owner from future participation.
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Chapter 20: Project-Based Assistance Programs

<p><u>20.10 FUNDING AND INCENTIVES</u></p> <p>20.10.1 Incentives for NED and UFAS Units</p> <p>Pursuant to the Bailey Consent Decree, HABC is creating 500 units with project-based voucher subsidy and 100 long term affordable units for non-elderly persons with disabilities, as that term is defined in the Bailey Consent Decree, and 120 long-term affordable units that are compliant with the Uniform Federal Accessibility Standards (“UFAS”). Developers seeking support from HABC and Baltimore City for Low Income Housing Tax Credits (“LIHTC”) must agree to set aside at least 15% of the LIHTC units for non-elderly persons with disabilities in order to obtain that support. Developers who are doing new construction or substantial rehab and receiving certain federal capital funds must make at least 5% of the units UFAS compliant. As an incentive to developers to create more than the units already required for non-elderly persons with disabilities and more than the required UFAS compliant units, HABC is offering, via a request for proposals/qualifications, capital funds to developers who agree to create in excess of 15% of the LIHTC units for non-elderly persons for disabilities and/or in excess of the 5% of the units as UFAS compliant.</p>	<p>20-6</p>	<p>Removed this Section as per comments from Planning and Development on 1/25/17.</p>
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FY2017 HCVP Admin Plan CURRENT POLICY	Page #	FY2018 HCVP Admin Plan AMENDMENTS PROPOSED POLICY
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Chapter 21: Monitoring, Recordkeeping, and Reporting

<p><u>21.2 MTW MONITORING</u> Requirement Re-examination of Assisted Families</p> <p>Standard Incomes of assisted families must be reexamined every two years on a timely basis, so that any changes in housing assistance payments are effective on the applicable anniversary date.</p> <p>Procedure HCV staff schedules reexaminations in a manner that ensures completion within 24 months of the previous re-examination...</p>	21-1	<p>Adding policy regarding 3-yr recerts for fixed income families: Standard ...applicable anniversary date.</p> <p><i>Incomes of assisted families, whose sole source is fixed, will be re-examined every three years.</i></p> <p>Procedure HCV staff schedules reexaminations in a manner that ensures completion within 24-36 months of the previous re-examination (<i>timeframe is dependent on sources of family members' income</i>)...</p>
<p>Requirement Housing Quality Standards (HQS)</p> <p>Standard HABC will track the number of units that did not meet HQS, the number of units that were improved, and the type and cost of the improvements...</p>	21-2	<p>Removing part of the statement as it is not current policy:</p> <p>Standard HABC will track the number of units that did not meet HQS; the number of units that were improved, and the type and cost of the improvements...</p>

Chapter 22: Program Integrity Addendum

<p><u>22.3 STEPS HABC WILL TAKE TO PREVENT PROGRAM ABUSE AND FRAUD</u> ...</p> <ul style="list-style-type: none"> • Things You Should Know: This program integrity bulletin (created by the HUD Inspector General) will be furnished and explained to all applicants to promote understanding of program rules, and to clarify the HABC expectations for cooperation and compliance. • Program Orientation Session: Mandatory briefing sessions will be conducted by the HABC staff for all prospective program participants, either prior to or upon issuance of a voucher. At the conclusion of all Program Orientation Sessions, the family representative will be required to sign a "Program Briefing Certificate" to confirm that all rules and pertinent regulations were explained to them. • Resident Counseling: The HABC will routinely provide participant counseling in order to clarify any confusion pertaining to program rules and requirements. 	PI-2	<p>Updating language to reflect current policy and regulations:</p> <ul style="list-style-type: none"> • Things You Should Know (HUD-1140-OIG): This program integrity bulletin (created by the HUD's inspector general) will be furnished and explained to all applicants to promote understanding of program rules, and to clarify the HABC's expectations for cooperation and compliance. • Program Orientation Session ("Briefing"): Mandatory briefing sessions will be conducted by the HABC staff for all prospective program participants, either prior to or upon issuance of a voucher. At the conclusion of all Program Orientation briefing sessions, the family representative will be required to sign an acknowledgment form "Program Briefing Certificate" to confirm that all rules and pertinent regulations were explained to them. • Resident Counseling: The HABC will routinely provide participant counseling as part of every certification interview, in order to clarify any confusion pertaining to program rules and requirements.
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FY2017 HCVP Admin Plan CURRENT POLICY	Page #	FY2018 HCVP Admin Plan AMENDMENTS PROPOSED POLICY
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Chapter 22: Program Integrity Addendum (Continued)

<p><u>22.4 STEPS HABC WILL TAKE TO DETECT PROGRAM ABUSE AND FRAUD</u></p> <p>...</p> <ul style="list-style-type: none"> • Quality Control File Reviews: Prior to initial certification, and at the completion of all subsequent re-examinations, the HABC will conduct Quality Control File Reviews in conformance with SEMAP standards. Such reviews shall include, but are not limited to... • Observations: The HABC Management and Occupancy Staff (to include inspection personnel) will maintain high awareness of circumstances that may indicate program abuse or fraud, such as unauthorized persons residing in the household and unreported income. Observations will be documented in the family's file. • State Wage Data Record Keepers: Inquiries to State Wage and Employment record keeping agencies as authorized under Public Law 100-628, the Stewart B. McKinley Homeless Assistance Amendments Act of 1988, may be made annually in order to detect unreported wages or unemployment compensation benefits. • Credit Bureau Inquiries: Credit Bureau inquiries may be made (with proper authorization by the applicant or participant) in the following circumstances: <ul style="list-style-type: none"> ○ At the time of final eligibility determination, ○ When an allegation is received by the HABC wherein unreported income sources are disclosed; ○ When a participant's expenditures exceed his/her reported income and no plausible explanation is given. <p>...</p>	PI -2 To PI -3	<p>Updating language to reflect current policy and regulations:</p> <ul style="list-style-type: none"> • Quality Control File Reviews: Prior to initial certification, and at the completion of all subsequent re-examinations, certifications, the HABC will conduct Quality Control File Reviews in conformance with SEMAP standards a sampling of files may be reviewed (<i>Quality Control File Review</i>). Such reviews shall include, but are not limited to... • Observations: The HABC <i>management</i> and Occupaney staff (to include inspection personnel) will maintain high awareness of circumstances that may indicate program abuse or fraud, such as unauthorized persons residing in the household and unreported income. Observations will be documented in the family's <i>hard-copy and electronic</i> files. • State Wage Data Record Keepers: Inquiries to State Wage and employment record keeping agencies, as authorized under Public Law 100-628 <i>and</i> the Stewart B. McKinley Homeless Assistance Amendments Act of 1988, may be made annually in order to detect unreported wages or unemployment compensation benefits. • Credit Bureau Inquiries: Credit Bureau inquiries may be made (with proper authorization by the applicant or participant) in the following circumstances: <ul style="list-style-type: none"> ○ At the time of final <i>and continued</i> eligibility determination, ○ When an allegation is received by the HABC wherein unreported income sources are disclosed; <i>and</i> ○ When a participant's expenditures exceed his/her reported income and no plausible explanation is given.
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FY2017 HCVP Admin Plan CURRENT POLICY	Page #	FY2018 HCVP Admin Plan AMENDMENTS PROPOSED POLICY
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Chapter 22: Program Integrity Addendum (Continued)

<p><u>22.5 HABC’S HANDLING OF ALLEGATIONS OF POSSIBLE ABUSE AND FRAUD</u></p> <p>HABC staff will encourage all participating families to report suspected abuse to the HABC Inspector General. All such referrals, as well as referrals from community members and other agencies will be thoroughly documented and placed in the participant’s file. All allegations, complaints and tips will be carefully evaluated in order to determine if they warrant follow-up.</p> <ul style="list-style-type: none"> • ...Conclusion of Preliminary Review: If at the conclusion of the preliminary file review there is/are fact(s) contained in the allegation which conflict with file data, and the fact(s) is/are independently verifiable, the Inspector General or designee will initiate an investigation to determine if the allegation is true or false. <p>...</p>	PI -3	<p>Changing Inspector General to Internal Audit and Investigation Unit (IAIU):</p> <p>HABC staff will encourage all participating families to report suspected abuse to the HABC’s Inspector General <i>Internal Audits and Investigations Unit (IAIU)</i>. All such referrals, as well as referrals from community members and other agencies will be thoroughly documented and placed in the participant’s file. All allegations, complaints and tips will be carefully evaluated in order to determine if they warrant follow-up.</p> <ul style="list-style-type: none"> • ...Conclusion of Preliminary Review: If at the conclusion of the preliminary file review there is/are fact(s) contained in the allegation which conflict with file data, and the fact(s) is/are independently verifiable, the Inspector General <i>IAIU</i> or designee will initiate an investigation to determine if the allegation is true or false. <p>...</p>
<p><u>22.7 HOW HABC WILL INVESTIGATE ALLEGATIONS OF ABUSE AND FRAUD</u></p> <p>If HABC determines that an allegation or referral warrants follow-up, either the staff person who is responsible for the file, or a person designated by the Executive Director to monitor the program compliance will conduct the investigation. The steps taken will depend upon the nature of the allegation and may include, but are not limited to, the items listed below. In all cases, the HBC will secure the written authorization from the program participant for the release of information...</p>	PI-4	<p>Updating language to reflect current policy and regulations:</p> <p>If HABC determines that an allegation or referral warrants follow-up, either the staff person who is responsible for the file, or a person designated by the Executive Director to monitor the program compliance <i>HABC will secure written authorization from the applicant/participant for the release of information and continue to</i> conduct the an investigation, <i>or refer the case to the appropriate Department (i.e. IAIU), law enforcement agency, and/or HUD.</i> The steps taken will depend upon the nature of the allegation and may include, but are not limited to, the items listed below. In all cases, the HBC will secure the written authorization from the program participant for the release of information...</p>
<p><u>22.9 CONCLUSION OF HABC’S INVESTIGATION</u></p> <p>At the conclusion of the investigative review, the reviewer will report the findings to the Executive Director or designee. It will then be determined whether a violation has occurred, a violation has not occurred, or if the facts are inconclusive.</p>	PI-5	<p>Updating language to reflect current policy and regulations:</p> <p>At the conclusion of the investigative investigation and/or review, the reviewer will report the findings to the Executive Director or designee. It it will then be determined whether a violation has occurred, a violation has not occurred, or if the facts are inconclusive and if so, whether a violation has or has not occurred.</p>

**Appendix G:
Summary of Proposed Changes to
The Public Housing Admission and Continued
Occupancy Policies**

There are no proposed changes to the Public Housing Admissions and Continued Occupancy Policies at this time.

Appendix H:
Annual Statements: Performance & Evaluation Reports

Annual Statement/Performance and Evaluation Report
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and
 Capital Fund Financing Program

U.S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 OMB No. 2577-0226
 Expires 4/30/2011

Part I: Summary		Grant Type and Number Capital Fund Program Grant No: Date of CFFP:	Replacement Housing Factor Grant No:	FFY of Grant: 2010
PHIA Name: Housing Authority of Baltimore City				FFY of Grant Approval: 2010
Type of Grant	<input type="checkbox"/> Original Annual Statement <input checked="" type="checkbox"/> Performance and Evaluation Report for Period Ending: November, 2016	<input type="checkbox"/> Reserve for Disasters/Emergencies	<input checked="" type="checkbox"/> Revised Annual Statement (revision no:5) <input type="checkbox"/> Final Performance and Evaluation Report	
Line	Summary by Development Account	Total Estimated Cost	Revised ¹	Total Actual Cost ¹
		Original	Obligated	Expended
1	Total non-CFFP Funds			
2	1406 Operations (may not exceed 20% of line 21) ³			
3	1408 Management Improvements			
4	1410 Administration (may not exceed 10% of line 21)			
5	1411 Audit			
6	1415 Liquidated Damages			
7	1430 Fees and Costs			
8	1440 Site Acquisition			
9	1450 Site Improvement			
10	1460 Dwelling Structures			
11	1465.1 Dwelling Equipment - Nonexpendable			
12	1470 Non-dwelling Structures			
13	1475 Non-dwelling Equipment			
14	1485 Demolition			
15	1492 Moving to Work Demonstration			
16	1495.1 Relocation Costs	\$2,934,122	\$2,934,122	\$ 887,431
17	1499 Development Activities ⁴	\$2,934,122		
18a	1501 Collateralization or Debt Service paid by the PHIA			
18ba	9000 Collateralization or Debt Service paid Via System of Direct Payment			
19	1502 Contingency (may not exceed 8% of line 20)			
20	Amount of Annual Grant: (sum of lines 2 - 19)			
21	Amount of line 20 Related to LBP Activities			
22	Amount of line 20 Related to Section 504 Activities			
23	Amount of line 20 Related to Security - Soft Costs			
24	Amount of line 20 Related to Security - Hard Costs			
25	Amount of line 20 Related to Energy Conservation Measures			

¹ To be completed for the Performance and Evaluation Report.

² To be completed for the Performance and Evaluation Report or a Revised Annual Statement.

³ PHAs with under 250 units in management may use 100% of CFFP Grants for operations.

⁴ RHF funds shall be included here.

Annual Statement/Performance and Evaluation Report
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and
 Capital Fund Financing Program

U.S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 Expires 4/30/2011

Part I: Summary		FFY of Grant: 2010	
PIIA Name: Housing Authority of Baltimore City		FFY of Grant Approval: 2010	
Grant Type and Number Capital Fund Program Grant No: Date of CFFP: _____		Replacement Housing Factor Grant No:	
Type of Grant <input type="checkbox"/> Original Annual Statement <input checked="" type="checkbox"/> Performance and Evaluation Report for Period Ending: November 30, 2016		<input checked="" type="checkbox"/> Revised Annual Statement (revision no: 5) <input type="checkbox"/> Final Performance and Evaluation Report	
Reserve for Disasters/Emergencies <input type="checkbox"/> Reserve for Disasters/Emergencies		Total Estimated Cost	
Summary by Development Account		Total Actual Cost	
Line		Total Actual Cost	
Signature of Executive Director Michael Braverman		Signature of Public Housing Director	
Date		Date	
Original		Revised	
Date		Date	
Obligated		Expended	

Annual Statement/Performance and Evaluation Report
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and
 Capital Fund Financing Program

U.S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 Expires 4/30/2011

Part I: Summary			
PIA Name: Housing Authority of Baltimore City		Grant Type and Number Capital Fund Program Grant No.: MD06P00250111 Replacement Housing Factor Grant No: Date of CFFP: _____	
Type of Grant <input type="checkbox"/> Original Annual Statement <input checked="" type="checkbox"/> Performance and Evaluation Report for Period Ending: November 30, 2016		<input checked="" type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Revised Annual Statement (revision no: 5) <input type="checkbox"/> Final Performance and Evaluation Report	
Line	Summary by Development Account	Total Estimated Cost	Total Actual Cost ¹
		Original	Revised ¹
Signature of Executive Director Michael Braverman (Acting)		Signature of Public Housing Director	
Date		Date	
		Obligated	Expended

Annual Statement/Performance and Evaluation Report
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and
 Capital Fund Financing Program

U.S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 OMB No. 2577-0226
 Expires 4/30/2011

Part I: Summary		Grant Type and Number Capital Fund Program Grant No: MD06P00250112 Date of CFFP: _____	Replacement Housing Factor Grant No: _____	FFY of Grant: 2012	FFY of Grant Approval: 2012
PHIA Name: Housing Authority of Baltimore City					
Type of Grant <input type="checkbox"/> Original Annual Statement <input checked="" type="checkbox"/> Performance and Evaluation Report for Period Ending: November 30, 2016		<input checked="" type="checkbox"/> Revised Annual Statement (revision no:5) <input type="checkbox"/> Final Performance and Evaluation Report			
Line	Summary by Development Account	Total Estimated Cost	Revised ²	Obligated	Total Actual Cost ¹
1	Total non-CFP Funds				Expended
2	1406 Operations (may not exceed 20% of line 21) ³				
3	1408 Management Improvements				
4	1410 Administration (may not exceed 10% of line 21)				
5	1411 Audit				
6	1415 Liquidated Damages				
7	1430 Fees and Costs				
8	1440 Site Acquisition				
9	1450 Site Improvement				
10	1460 Dwelling Structures				
11	1465.1 Dwelling Equipment – Nonexpendable				
12	1470 Non-dwelling Structures				
13	1475 Non-dwelling Equipment				
14	1485 Demolition				
15	1492 Moving to Work Demonstration	\$7,163,669	\$7,163,669	\$7,163,669	\$7,163,669
16	1495.1 Relocation Costs				
17	1499 Development Activities ⁴	\$3,664,046	\$3,664,046	\$3,664,046	\$3,118,666
18a	1501 Collateralization or Debt Service paid by the PHIA	\$6,516,536	\$6,516,536	\$6,516,536	\$6,516,536
18ba	9000 Collateralization or Debt Service paid Via System of Direct Payment				
19	1502 Contingency (may not exceed 8% of line 20)				
20	Amount of Annual Grant: (sum of lines 2 – 19)	\$17,344,251	\$17,344,251	\$17,344,251	\$17,344,251
21	Amount of line 20 Related to LBP Activities				
22	Amount of line 20 Related to Section 504 Activities				
23	Amount of line 20 Related to Security – Soft Costs				
24	Amount of line 20 Related to Security – Hard Costs				
25	Amount of line 20 Related to Energy Conservation Measures				

¹ To be completed for the Performance and Evaluation Report.
² To be completed for the Performance and Evaluation Report or a Revised Annual Statement.
³ PHAs with under 250 units in management may use 100% of CFP Grants for operations.
⁴ RTIF funds shall be included here.

Annual Statement/Performance and Evaluation Report
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and
 Capital Fund Financing Program

U.S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 OMB No. 2577-0226
 Expires 4/30/2011

Part I: Summary		Grant Type and Number Capital Fund Program Grant No.: MD06P00250113 Date of CFFP: _____	Replacement Housing Factor Grant No: _____	FFY of Grant: 2013	FFY of Grant Approval: 2013
PIHA Name: Housing Authority of Baltimore City					
Type of Grant <input type="checkbox"/> Original Annual Statement <input checked="" type="checkbox"/> Performance and Evaluation Report for Period Ending: <u>November 30, 2016</u>		<input checked="" type="checkbox"/> Revised Annual Statement (revision no: 5) <input type="checkbox"/> Final Performance and Evaluation Report		Total Actual Cost	
Line	Summary by Development Account	Original	Revised ¹	Obligated	Expended
1	Total non-CFF Funds				
2	1406 Operations (may not exceed 20% of line 21) ³				
3	1408 Management Improvements				
4	1410 Administration (may not exceed 10% of line 21)				
5	1411 Audit				
6	1415 Liquidated Damages				
7	1430 Fees and Costs				
8	1440 Site Acquisition				
9	1450 Site Improvement				
10	1460 Dwelling Structures				
11	1465.1 Dwelling Equipment - Nonexpendable				
12	1470 Non-dwelling Structures				
13	1475 Non-dwelling Equipment				
14	1485 Demolition				
15	1492 Moving to Work Demonstration	\$5,858,396	\$5,858,396	\$5,858,396	\$5,858,396
16	1495.1 Relocation Costs				
17	1499 Development Activities ⁴	\$4,063,394	\$4,063,394	\$4,063,394	\$2,576,810
18a	1501 Collateralization or Debt Service paid by the PIHA	\$6,517,686	\$6,517,686	\$6,517,686	\$6,517,686
18ba	9000 Collateralization or Debt Service paid Via System of Direct Payment				
19	1502 Contingency (may not exceed 8% of line 20)				
20	Amount of Annual Grant: (sum of lines 2 - 19)	\$16,439,476	\$16,439,476	\$16,439,476	\$14,952,892
21	Amount of line 20 Related to LBP Activities				
22	Amount of line 20 Related to Section 504 Activities				
23	Amount of line 20 Related to Security - Soft Costs				
24	Amount of line 20 Related to Security - Hard Costs				
25	Amount of line 20 Related to Energy Conservation Measures				

¹ To be completed for the Performance and Evaluation Report.
² To be completed for the Performance and Evaluation Report or a Revised Annual Statement.
³ PIHAs with under 250 units in management may use 100% of CFFP Grants for operations.
⁴ RHF funds shall be included here.

Annual Statement/Performance and Evaluation Report
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and
 Capital Fund Financing Program

U.S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 Expires 4/30/2011

Part I: Summary		Grant Type and Number Capital Fund Program Grant No. MD06P00250113		Replacement Housing Factor Grant No:		FFY of Grant: 2013	
PIIA Name: Housing Authority of Baltimore City		Date of CFFP: _____		FFY of Grant Approval: 2013			
Type of Grant <input type="checkbox"/> Original Annual Statement <input checked="" type="checkbox"/> Performance and Evaluation Report for Period Ending: November 30, 2016		<input type="checkbox"/> Reserve for Disasters/Emergencies <input checked="" type="checkbox"/> Revised Annual Statement (revision no: 5) <input type="checkbox"/> Final Performance and Evaluation Report		Total Estimated Cost		Total Actual Cost ¹	
Line Summary by Development Account		Original		Revised ²		Obligated	
Signature of Executive Director (Acting) Michael Braverman		Date		Signature of Public Housing Director		Date	

Annual Statement/Performance and Evaluation Report
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and
 Capital Fund Financing Program

U.S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 OMB No. 2577-0226
 Expires 4/30/2011

Part I: Summary		Grant Type and Number Capital Fund Program Grant No. MD06P00250114	Replacement Housing Factor Grant No.:	FFY of Grant: 2014	
PHJA Name: Housing Authority of Baltimore City		Date of CFFP:		FFY of Grant Approval: 2014	
Type of Grant <input type="checkbox"/> Original Annual Statement <input checked="" type="checkbox"/> Performance and Evaluation Report for Period Ending: November 30, 2016		<input checked="" type="checkbox"/> Revised Annual Statement (revision no:4) <input type="checkbox"/> Final Performance and Evaluation Report			
Line	Summary by Development Account	Total Estimated Cost	Revised ¹	Obligated	Expended
1	Total non-CFFP Funds				
2	1406 Operations (may not exceed 20% of line 21) ³				
3	1408 Management Improvements				
4	1410 Administration (may not exceed 10% of line 21)				
5	1411 Audit				
6	1415 Liquidated Damages				
7	1430 Fees and Costs				
8	1440 Site Acquisition				
9	1450 Site Improvement				
10	1460 Dwelling Structures				
11	1465 1 Dwelling Equipment—Nonexpendable				
12	1470 Non-dwelling Structures				
13	1475 Non-dwelling Equipment				
14	1485 Demolition				
15	1492 Moving to Work Demonstration	\$10,644,732	\$10,644,732	\$10,644,732	\$9,147,363
16	1495 1 Relocation Costs				
17	1499 Development Activities ⁴	\$2,800,541	\$2,800,541	\$2,800,541	\$ 540,927
18a	1501 Collateralization or Debt Service paid by the PHJA	\$3,813,171	\$3,813,171	\$3,813,171	\$3,813,171
18ba	9000 Collateralization or Debt Service paid Via System of Direct Payment				
19	1502 Contingency (may not exceed 8% of line 20)				
20	Amount of Annual Grant: (sum of lines 2 - 19)	\$17,258,444	\$17,258,444	\$17,258,444	\$13,501,461
21	Amount of line 20 Related to LBP Activities				
22	Amount of line 20 Related to Security - Soft Costs				
23	Amount of line 20 Related to Security - Hard Costs				
24	Amount of line 20 Related to Energy Conservation Measures				
25					

¹ To be completed for the Performance and Evaluation Report.
² To be completed for the Performance and Evaluation Report or a Revised Annual Statement.
³ PHJAs with under 250 units in management may use 100% of CFFP Grants for operations.
⁴ RIIF funds shall be included here.

Annual Statement/Performance and Evaluation Report
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and
 Capital Fund Financing Program

U.S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 Expires 4/30/2011

Part I: Summary		Grant Type and Number Capital Fund Program Grant No: MD06P00250114 Replacement Housing Factor Grant No:		FFY of Grant: 2014
PHIA Name: Housing Authority of Baltimore City		Date of CFFP: _____		FFY of Grant Approval: 2014
Type of Grant <input type="checkbox"/> Original Annual Statement <input checked="" type="checkbox"/> Performance and Evaluation Report for Period Ending: November 30, 2016 <input type="checkbox"/> Reserve for Disasters/Emergencies <input checked="" type="checkbox"/> Revised Annual Statement (revision no:4) <input type="checkbox"/> Final Performance and Evaluation Report		Total Estimated Cost	Revised	Total Actual Cost ¹
Line	Summary by Development Account	Original	Obligated	Expended
Signature of Executive Director <i>(Acting)</i> Michael Braverman		Date	Signature of Public Housing Director	Date

Annual Statement/Performance and Evaluation Report
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and
 Capital Fund Financing Program

U.S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 OMB No. 2577-0226
 Expires 4/30/2011

Part I: Summary		Grant Type and Number Capital Fund Program Grant No. MD06P00250115 Date of CFFP:	Replacement Housing Factor Grant No:	FFY of Grant: 2015	FFY of Grant Approval: 2015
PIHA Name: Housing Authority of Baltimore City					
Type of Grant	<input type="checkbox"/> Original Annual Statement and Evaluation Report for Period Ending: November 30, 2016	<input type="checkbox"/> Reserve for Disasters/Emergencies	<input checked="" type="checkbox"/> Revised Annual Statement (revision no:8)		
Line	Summary by Development Account	Total Estimated Cost	Revised ²	Obligated	Total Actual Cost ¹
		Original			Expended
1	Total non-CFP Funds				
2	1406 Operations (may not exceed 20% of line 21) ³				
3	1408 Management Improvements				
4	1410 Administration (may not exceed 10% of line 21)				
5	1411 Audit				
6	1415 Liquidated Damages				
7	1430 Fees and Costs				
8	1440 Site Acquisition				
9	1450 Site Improvement				
10	1460 Dwelling Structures				
11	1465.1 Dwelling Equipment - Nonexpendable				
12	1470 Non-dwelling Structures				
13	1475 Non-dwelling Equipment				
14	1485 Demolition				
15	1492 Moving to Work Demonstration	\$14,726,153	\$14,726,153	\$14,601,478	\$ 7,767,884
16	1495.1 Relocation Costs				
17	1499 Development Activities ⁴	\$ 2,204,430	\$ 2,204,430	\$0	\$0
18a	1501 Collateralization or Debt Service paid by the PHA				
18ba	9000 Collateralization or Debt Service paid Via System of Direct Payment				
19	1503 (RAD Subsidy)	\$ 577,031	\$ 577,031	\$ 577,031	\$ 566,530
20	Amount of Annual Grant: (sum of lines 2 - 19)	\$17,507,614	\$17,507,614	\$15,178,509	\$ 8,324,415
21	Amount of line 20 Related to LBP Activities				
22	Amount of line 20 Related to Section 504 Activities				
23	Amount of line 20 Related to Security - Soft Costs				
24	Amount of line 20 Related to Security - Hard Costs				
25	Amount of line 20 Related to Energy Conservation Measures				

¹ To be completed for the Performance and Evaluation Report.
² To be completed for the Performance and Evaluation Report or a Revised Annual Statement.
³ PHAs with under 250 units in management may use 100% of CFFP Grants for operations.
⁴ RIF funds shall be included here.

Annual Statement/Performance and Evaluation Report
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and
 Capital Fund Financing Program

U.S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 Expires 4/30/2011

Part I: Summary	
PIHA Name: Housing Authority of Baltimore City	Grant Type and Number Capital Fund Program Grant No. MD06P00250115 Replacement Housing Factor Grant No: Date of CFFP: _____
Type of Grant <input type="checkbox"/> Original Annual Statement <input checked="" type="checkbox"/> Performance and Evaluation Report for Period Ending: November 30, 2016	FFY of Grant: 2015 FFY of Grant Approval: 2015
<input type="checkbox"/> Reserve for Disasters/Emergencies <input checked="" type="checkbox"/> Performance and Evaluation Report for Period Ending: November 30, 2016	<input checked="" type="checkbox"/> Revised Annual Statement (revision no: 8) <input type="checkbox"/> Final Performance and Evaluation Report
Line Summary by Development Account	Total Estimated Cost
Original Date	Revised ² Date
Signature of Executive Director (Acting) Michael Braverman	Signature of Public Housing Director
	Total Actual Cost ¹
	Obligated Expended

Annual Statement/Performance and Evaluation Report
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and
 Capital Fund Financing Program

U.S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 OMB No. 2577-0226
 Expires 4/30/2011

Part I: Summary		Grant Type and Number Capital Fund Program Grant No: MD06E00250115 Replacement Housing Factor Grant No:		FFY of Grant: 2015
PHIA Name: Housing Authority of Baltimore City		Date of CFP:		FFY of Grant Approval: 2015
Type of Grant <input type="checkbox"/> Original Annual Statement <input checked="" type="checkbox"/> Performance and Evaluation Report for Period Ending: November 30, 2016		<input checked="" type="checkbox"/> Revised Annual Statement (revision no:2) <input type="checkbox"/> Final Performance and Evaluation Report		
Line	Summary by Development Account	Total Estimated Cost	Revised ²	Total Actual Cost ¹
		Original	Obligated	Expended
1	Total non-CFP Funds	\$250,000	\$250,000	\$23,391
2	1406 Operations (may not exceed 20% of line 21) ³			
3	1408 Management Improvements			
4	1410 Administration (may not exceed 10% of line 21)			
5	1411 Audit			
6	1415 Liquidated Damages			
7	1430 Fees and Costs			
8	1440 Site Acquisition			
9	1450 Site Improvement			
10	1460 Dwelling Structures	\$ 250,000	\$250,000	\$23,391
11	1465.1 Dwelling Equipment—Nonexpendable			
12	1470 Non-dwelling Structures			
13	1475 Non-dwelling Equipment			
14	1485 Demolition			
15	1492 Moving to Work Demonstration			
16	1495.1 Relocation Costs			
17	1499 Development Activities ⁴			
18a	1501 Collateralization or Debt Service paid by the PHIA			
18ba	9000 Collateralization or Debt Service paid Via System of Direct Payment			
19	1503 (RAD Subsidy)			
20	Amount of Annual Grant: (sum of lines 2 - 19)	\$250,000	\$250,000	\$23,391
21	Amount of line 20 Related to LBP Activities			
22	Amount of line 20 Related to Section 504 Activities			
23	Amount of line 20 Related to Security - Soft Costs			
24	Amount of line 20 Related to Security - Hard Costs	\$250,000	\$250,000	\$23,391
25	Amount of line 20 Related to Energy Conservation Measures			

¹ To be completed for the Performance and Evaluation Report.
² To be completed for the Performance and Evaluation Report or a Revised Annual Statement.
³ PHIA's with under 250 units in management may use 100% of CFP Grants for operations.
⁴ RHT funds shall be included here.

Annual Statement/Performance and Evaluation Report
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and
 Capital Fund Financing Program

U.S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 Expires 4/30/2011

Part I: Summary		FFY of Grant: 2015	
PHIA Name: Housing Authority of Baltimore City		Grant Type and Number Capital Fund Program Grant No. MD06E00250115	Replacement Housing Factor Grant No:
Type of Grant <input type="checkbox"/> Original Annual Statement <input checked="" type="checkbox"/> Performance and Evaluation Report for Period Ending: November 30, 2016		FFY of Grant Approval:	
<input type="checkbox"/> Reserve for Disasters/Emergencies <input checked="" type="checkbox"/> Performance and Evaluation Report for Period Ending: November 30, 2016		<input checked="" type="checkbox"/> Revised Annual Statement (revision no: 2) <input type="checkbox"/> Final Performance and Evaluation Report	
Line	Summary by Development Account	Total Estimated Cost	Total Actual Cost ¹
		Original	Revised ²
Signature of Executive Director Michael Braverman (Acting)		Signature of Public Housing Director	
Date		Date	
		Obligated	Expended

Annual Statement/Performance and Evaluation Report
Capital Fund Program, Capital Fund Program Replacement Housing Factor and
Capital Fund Financing Program

Part I: Summary		Grant Type and Number Capital Fund Program Grant No. MD06P00250116 Replacement Housing Factor Grant No. _____	FY of Grant: 2016
PIA Name: Housing Authority of Baltimore City		Date of CFP: _____	FY of Grant Approval: 2016
Type of Grant	<input type="checkbox"/> Reserve for Disasters/Emergencies <input checked="" type="checkbox"/> Revised Annual Statement (revision no:4) <input type="checkbox"/> Final Performance and Evaluation Report		
Line	Summary by Development Account	Total Estimated Cost	Total Actual Cost ¹
		Original	Obligated
			Expended
1	Total non-CFP Funds		
2	1406 Operations (may not exceed 20% of line 21) ²		
3	1408 Management Improvements		
4	1410 Administration (may not exceed 10% of line 21)		
5	1411 Audit		
6	1415 Liquidated Damages		
7	1430 Fees and Costs		
8	1440 Site Acquisition		
9	1450 Site Improvement		
10	1460 Dwelling Structures		
11	1465 1 Dwelling Equipment—Nonexpendable		
12	1470 Non-dwelling Structures		
13	1475 Non-dwelling Equipment		
14	1485 Demolition	\$14,903,741	\$ 63,425
15	1492 Moving to Work Demonstration		
16	1495 1 Relocation Costs	\$ 1,756,459	0
17	1499 Development Activities ³		
18a	1501 Collateralization or Debt Service paid by the PIA		
18ba	9000 Collateralization or Debt Service paid Via System of Direct Payment		
19	1503 (RAI) Subsidy	\$ 147,769	\$ 477,578
20	Amount of Annual Grant (sum of lines 2 – 19)	\$16,807,969	\$ 4,179,441
21	Amount of line 20 Related to LBP Activities		
22	Amount of line 20 Related to Section 504 Activities		
23	Amount of line 20 Related to Security – Soft Costs		
24	Amount of line 20 Related to Security – Hard Costs		
25	Amount of line 20 Related to Energy Conservation Measures		

¹ To be completed for the Performance and Evaluation Report.
² To be completed for the Performance and Evaluation Report or a Revised Annual Statement.
³ PIAs with under 250 units in management may use 100% of CFP Grants for operations.
⁴ RFIIF funds shall be included here.

Annual Statement/Performance and Evaluation Report
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and
 Capital Fund Financing Program

U.S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 Expires 4/30/2011

Part I: Summary		Grant Type and Number Capital Fund Program Grant No: MD06P00250116 Replacement Housing Factor Grant No:		FFY of Grant: 2016
PIHA Name: Housing Authority of Baltimore City		Date of CFFP: _____		FFY of Grant Approval: 2016
Type of Grant <input type="checkbox"/> Original Annual Statement <input type="checkbox"/> Performance and Evaluation Report for Period Ending: November 30, 2016 <input type="checkbox"/> Reserve for Disasters/Emergencies <input checked="" type="checkbox"/> Revised Annual Statement (revision no:4) <input type="checkbox"/> Final Performance and Evaluation Report		Total Estimated Cost	Revised †	Total Actual Cost †
Line	Summary by Development Account	Original	Obligated	Expended
Signature of Executive Director (Acting) Michael Braverman		Signature of Public Housing Director		Date

**Appendix I:
Other HABC Housing**

**Appendix I
Other Housing**

Public Housing	Total Site Units	Total ACC Units	Bedroom Distribution						
			0 BR's	1 BR's	2 BR's	3 BR's	4 BR's	5 BR's	6 BR's
Developments									
Albemarle Square	327	130		11	31	80	8		
Monastery Gardens Apartments	37	11		2	5	4			
Montpelier's Choice (PH)	39	13		1	6	6			
Poe Homes	288	288		138	124	26			
Townes at The Terraces	203	203			78	110	15		
Westhills Square	108	11		2	8	1			
Barclay Townhomes	72	53		39	5	5	2	2	
CHM	14	14			4	6	3		1
Homes of Arundel	58	58	2	1	7	40	8		
Midtown Apartments	35	35		7	17	11			
Renaissance at Reservoir Hill	64	40		12	9	13	5		1
Sharp-Leadenhall	31	23		2	7	7	7		
St. Ambrose	30	30		1	1	24	4		
Stricker Street Apartments	25	25		4	7	2	12		
Uptown Apartments	37	37		4	25	3	5		
TOTAL	1580	1033	2	250	370	338	69	2	2

**Appendix I
Other Housing**

Rental Assistance Demonstration Conversions (RAD)	Total Units	Bedroom Distribution						
		0 BR's	1 BR's	2 BR's	3 BR's	4 BR's	5 BR's	6 BR's
Development								
FY17 Conversions:								
Allendale	164		164					
Bel-Park Tower	253	134	119					
Bernard E. Mason	223		223					
Brentwood	150	86	64					
Chase House	189	109	80					
Ellerslie	117	70	47					
Govans	191	102	89					
Hollins House	130		130					
Lakeview Towers	302	199	103					
McCulloh Homes	349	134	199	16				
Primrose Place	125		125					
PVG Towns	201		11	130	50	10		
PVG Senior	110		110					
Wyman House	168	112	56					
Broadway	84		22	12	39	11		
Terrace Garden Co-op	47		46	1				
Total for FY 2017	2,803	946	1,588	159	89	21		
FY18 Conversions:								
Arbor Oaks	62		26	36				
Heritage Crossing	75		6	22	39	8		
Hillside Park	30		1	29				
J Van Story Branch	357	221	136					
Monument East	170	51	119					
Rosemont Tower	203		203					
Somerset Extension	60				32	20	4	4

**Appendix I
Other Housing**

Rental Assistance Demonstration (RAD)	Total Units	Bedroom Distribution						
Development		0 BR's	1 BR's	2 BR's	3 BR's	4 BR's	5 BR's	6 BR's
Townes at the Terraces	203			78	110	15		
Homes for Arundel	58		1	7	44	6		
Total for FY 2018:	1,218	272	492	172	225	49	4	4

Bailey Long Term Affordable (LTA)	Total Units	Bedroom Distribution						
Development		0 BR's	1 BR's	2 BR's	3 BR's	4 BR's	5 BR's	6 BR's
Barclay	33		22	5	6			
Bon Secours Gibbons	8			4	4			
Chai-Fallstaff	1				1			
Chapel Green	10		8		2			
City Arts II.	3			3				
Fells Point Station	8		5	3				
Franklin Flats & Lofts	7		7					
Key's Pointe	16		12	1	2	1		
Key's Pointe (Non-Bailey Units)	23		2	10	11			
Lillian Jones	8			2	6			
Moravia Park	9		9					
Mulberry at Park	8			2	6			
North Avenue Gateway	5			5				
Orchard Ridge	97		69	14	10	3	1	
Penn Square	16		12		4			
Poppleton	16		7	1	8			
Reservoir Hill	15		11	3	1			
Sharp Leadenhall	5		5					
Uplands	6			4	2			
TOTAL	294		169	57	63	4	1	

**Appendix I
Other Housing**

Other HABC Owned Units (Non-ACC)	Total Units	Bedroom Distribution						
		0 BR's	1 BR's	2 BR's	3 BR's	4 BR's	5 BR's	6 BR's
Development								
Barister Court	32	5	21	6				
Indecco Apts	45	12	33					
Invington Place	41	6	35					
Maxwell III	20			4	13	2	1	
Montpelier's Choice	26		8	9	9			
Norman Lohn House	12		3	9				
Somerset Chase	22			2	20			
West Lexington	44			3	41			
Total	242	23	100	33	83	2	1	0

Appendix J:
General Housing Authority Operating Information
and
MTW Sources and Uses of Funds

Form 50900: Elements for the Annual MTW Plan and Annual MTW Report
APPENDIX J

(II) General Housing Authority Operating Information

Annual MTW Plan

II.1.Plan.HousingStock

A. MTW Plan: Housing Stock Information

Planned New Public Housing Units to be Added During the Fiscal Year

AMP Name and Number	Bedroom Size							Total Units	Population Type *	# of UFAS Units	
	0	1	2	3	4	5	6+			Fully Accessible	Adaptable
MD002/TBD Hollander Ridge	0	20	30	40	10	0	0	100	General	5	0
N/A	0	0	0	0	0	0	0	0	N/A	0	0

Total Public Housing Units to be Added **100**

* Select Population Type from: Elderly, Disabled, General, Elderly/Disabled, Other

If Other, please describe: **N/A**

Planned Public Housing Units to be Removed During the Fiscal Year

PIC Dev. # / AMP and PIC Dev. Name	Number of Units to be Removed	Explanation for Removal
MD002/0200 Scattered Sites	50	Obsolete and non-viable scattered sites units
MD002/0201 Scattered Sites	134	Obsolete and non-viable scattered sites units
MD002/0202 Scattered Sites	93	Obsolete and non-viable scattered sites units
MD002/0203 Scattered Sites	165	Obsolete and non-viable scattered sites units
MMD/0006 Gilmor Homes	132	Obsolete and non-viable conventional units
MD002/0009 O'Donnell Heights		Six (6) lots will be sold to a developer to build for-sale housing.
MD002/0042 Somerset Extension	60	RAD Conversion
MD002/0010 Somerset Homes		8.64 acres of vacant land
MD002/0043 Monument East	170	RAD Conversion
MD002/0070 Rosemont Tower	203	RAD Conversion
MD002/0041 J. Van Story Apts.	357	RAD Conversion
MD002/0111 Heritage Crossing	75	RAD Conversion
MD002/000105 Hillside Park	30	RAD Conversion
MD002/0101 Arbor Oaks Apts.	62	RAD Conversion
MD002/0106 Townes @ the Terraces (Family)	203	RAD Conversion
MD002/0118 Homes for Arundel (Family)	58	RAD Conversion
Total Number of Units to be Removed	1792	

*New Housing Choice Vouchers to be Project-Based During the Fiscal Year			
Property Name	Anticipated Number of New Vouchers to be Project-Based *	Description of Project	
Orchard Ridge V	16	16- PBV units (10-1 bedrooms, 5-3bedrooms, and 1-4bedroom) at multiple addresses throughout the city developed by Pennrose Properties, LLC are under construction.	
Episcopal Housing – Argyle	12	12 vouchers for the homeless (12-1bedroom units) located at 1411 Argyle Street being developed by Episcopal Housing Corporation are in financing.	
O'Donnell Heights Phase IB	16	This is new construction at O'Donnell Heights renamed Key's Pointe, in southeast Baltimore. For Phase 1B joint venture development partners, Michaels Development and Greater Baltimore AHC will include a total of 68 newly constructed affordable rental units. HABC is providing 34 project-based vouchers for returning residents, non-elderly persons with disabilities and households needing the features of UFAS compliant units. The remaining 34 units will be affordable to households earning less than 60% of the AMI.	
Franklin Flats	7	7 LTA NED one bedroom units located at 20 Franklin Street developed by Osprey Property Company, LLC are under construction	
Metro at Mondawmin	18	Metro at Mondawmin is a proposed 70-unit affordable rental housing development located in the Liberty Square neighborhood of West Baltimore. It is being developed by Enterprise Housing Corporation (developer/sponsor) and will include a mix of 1-, 2-, and 3-bedroom units for families earning between 30% and 60% of the Area Median Income (AMI), including eleven (11) units for Non-Elderly Disabled residents (15%) and seven (7) units for Homeless Residents (10%).	
New Shiloh	19	This project is a proposed 73-unit affordable low-income housing tax credit development for families. It is being co-developed by sponsor Bon Secour's Unity Properties, Inc., New Shiloh CDC, and development consultant Enterprise Homes, Inc (collectively, the "Developer") and will include a mix of 1-, 2-, and 3-bedroom units for families earning between 30% and 60% of the AMI, including 11 units for Non-Elderly Disabled residents (15%) and 8 units (10%) serving people who would otherwise be homeless.	
North Avenue Gateway	16	North Avenue Gateway II project is a 65 unit family project located on the north side of the 3000 block of West North Avenue in Baltimore. Ten (10) one-bedroom units will be reserved for non-elderly disabled (NED) individual/households. These units will be affordable to households with incomes at or below 30% of the AMI for a period of 40 years (LTA NEDs). The units will be integrated throughout the project to avoid concentration in any particular building or area. The North Avenue Gateway project will also have 6 one-bedroom units for Homeless individuals. The City of Baltimore will reserve Section 8 Project Based Rental Subsidy for these 6 Homeless units.	
L on Liberty	14	This new construction project is located at 213 -215 Park Avenue and 208 Liberty Street in Baltimore. The project will provide seventy-one (71) units of affordable housing and of those, 11 units will be reserved for tenants with incomes of 30% or less than the AMI.	
Restoration Gardens II	42	This project has forty-two (42) project-based vouchers for the property located at 4201 York Road, and 501 ½ East 43rd Baltimore. These are Efficiency-Sized Units that are in financing and being developed by The French Development Company.	
Paca	92	92 Veteran units located at 116-120 North Paca Street developed by Somerset Development Company, LLC is in pre-development	
Walbrook	10	10 PBV units located at 2636 Walbrook Avenue developed by Osprey Property Company LLC and Coppin Height Community Development Corporation are in pre-development.	
Marian House	6	6 Homeless units.	
Shannon House	18	18 Homeless (14-2bedroom and 4-3bedroom) units located at 4613 Park Heights Avenue are in development by Sherick Project Management.	
Project Plase	56	56 PBV (all one bedroom) units located at 3549-3601 Old Frederick Road and developed by Project PLASE are in pre-development.	
Anticipated Total New Vouchers to be Project-Based	342	Anticipated Total Number of Project-Based Vouchers Committed at the End of the Fiscal Year (Does not include Thompson).	2,225
		Anticipated Total Number of Project-Based Vouchers Leased Up or Issued to a Potential Tenant at the End of the Fiscal Year (Does not include Thompson).	2,069

*New refers to tenant-based vouchers that are being project-based for the first time. The count should only include agreements in which a HAP agreement will be in place by the end of the year.

Other Changes to the Housing Stock Anticipated During the Fiscal Year

Vacant units at nine (9) mixed-population, family and mixed-finance developments scheduled for RAD conversion in FY 2018 will be held off-line for the temporary relocation of existing residents. In addition, HABC anticipates that its adjusted occupancy rate will be 97% primarily because of the uncertainty in allocations of funding to the housing operations division, and future appropriations.

Description of other changes to the housing stock anticipated during the fiscal year

Examples of the types of other changes can include but are not limited to units that are held off-line due to the relocation of residents, units that are off-line due to substantial rehabilitation and potential plans for acquiring units.

General Description of All Planned Capital Fund Expenditures During the Plan Year

Gas Piping Survey and Mapping, Rehab for Training Facility, Domestic Hot Water Replacement, Condensate Receivers, Window and Door Replacements, Sump Pump Replacement and Installation, Installation of Energy Conservation Measures, Basketball Court Repairs, Electrical Distribution Upgrades, Heating System Repairs/Replacement, Playground Repairs/Replacement, Gas Pipe Replacement, Exit Light Fixture Installations, Dumpster Replacement, Roof Replacement, Handicap Accessibility Improvements, Structural Improvements, Elevator Improvements, Vacancies, Painting, Kitchen and Bathroom Upgrades, Emergency Repairs, Miscellaneous Site Work, Redevelopment of Replacement Housing, the , technical and non-technical salaries and benefits and associated capital operating costs, consultant fees, relocation, management improvements, resident anti-drug program, affordable homeownership, sub-metering maintenance and service, debt service and environmental related testing, improvements and training.

II.2.Plan.Leasing

MTW Households to be Served Through:	Planned Number of Households to be Served*	Planned Number of Unit Months Occupied/Leased***
Federal MTW Public Housing Units to be leased	7,655	91,860
Federal MTW Voucher (HCV) Units to be Utilized	13,305	159,660
Number of Units to be Occupied/Leased through Local, Non-Traditional, MTW Funded, Property-Based Assistance Programs **	0	0
Number of Units to be Occupied/Leased through Local, Non-Traditional, MTW Funded, Tenant-Based Assistance Programs **	0	0

Includes 294 MTW Bailey and HABC Long-Term Affordable Project-Based Voucher units. *

Calculated by dividing the planned number of unit months occupied/leased by 12.

** In instances when a local, non-traditional program provides a certain subsidy level but does not specify a number of units/households to be served, the PHA should estimate the number of households to be served.

***Unit Months Occupied/Leased is the total number of months the PHA has leased/occupied units, according to unit category during the fiscal year.

Reporting Compliance with Statutory MTW Requirements

If the PHA has been out of compliance with any of the required statutory MTW requirements listed in Section II(C) of the Standard MTW Agreement, the PHA will provide a narrative discussion and a plan as to how it will return to compliance. If the PHA is currently in compliance, no discussion or reporting is necessary.

HABC is in compliance with all MTW statutory requirements.

Description of any Anticipated Issues Related to Leasing of Public Housing, Housing Choice Vouchers and/or Local, Non-Traditional Units and Possible Solutions

Housing Program	Description of Anticipated Leasing Issues and Possible Solutions
Public Housing	HABC anticipates delays in leasing within the Scattered sites portfolio as it evaluates the viability of its single family properties prior to the make ready process. Units deemed non-viable will undergo the HUD disposition process.
Housing Choice Voucher Program	Under its ACC, HABC's HCVP-MTW funding limits the number of households for which assistance can be made available to no more than approximately 13,500 (this funding limitation does not affect Thompson-MTW, HUD-VASH, New Construction or Moderate Rehabilitation vouchers). Uncertainty concerning the level of available HAP funding to be provided to HABC for CY 2017 is an additional contributing factor in determining projected utilization.

II.3.Plan.WaitList

C. MTW Plan: Wait List Information

Wait List Information Projected for the Beginning of the Fiscal Year

Housing Program(s) *	Wait List Type**	Number of Households on Wait List	Wait List Open, Partially Open or Closed***	Are There Plans to Open the Wait List During the Fiscal Year
Federal MTW Housing Choice Voucher Units: Tenant-Based	Community Wide	23,442	Closed	No
Federal MTW Housing Choice Voucher Units: Project-Based	Site-Based	7,074	Opened December 30, 2015. Will close June 30, 2017	No. There are no plans to open this waiting list in FY 2018.
Federal MTW Public Housing Units	Community Wide	27,644	Open	N/A
Federal MTW Public Housing and HCVP Units	Merged	5,644	The Public Housing waiting list is open; the Tenant-based HCV waiting list is closed and the Project-based waiting list will close on June 30, 2017.	No. There are no plans to open either the Tenant-based or Project-based waiting lists in FY 2018.
Thompson Vouchers	Program Specific	11,985	Open	No. This wait list will close on March 31, 2017

Rows for additional waiting lists may be added, if needed.

* *Select Housing Program* : Federal MTW Public Housing Units; Federal MTW Housing Choice Voucher Program; Federal non-MTW Housing Choice Voucher Units; Tenant-Based Local, Non-Traditional MTW Housing Assistance Program; Project-Based Local, Non-Traditional MTW Housing Assistance Program; and Combined Tenant-Based and Project-Based Local, Non-Traditional MTW Housing Assistance Program.

** *Select Wait List Types* : Community-Wide, Site-Based, Merged (Combined Public Housing or Voucher Wait List), Program Specific (Limited by HUD or Local PHA Rules to Certain Categories of Households which are Described in the Rules for Program Participation), None (If the Program is a New Wait List, Not an Existing Wait List), or Other (Please Provide a Brief Description of this Wait List Type).

*** For Partially Open Wait Lists, provide a description of the populations for which the waiting list is open.

If Local, Non-Traditional Housing Program, please describe:

N/A

If Other Wait List Type, please describe:

N/A

If there are any changes to the organizational structure of the wait list or policy changes regarding the wait list, provide a narrative detailing these changes.

In FY 2017, HABC was approved to convert the public housing waiting list to a Centrally-Administered Location Based ("CALB") waiting list. HABC expects to implement the CALB waiting list in FY2018. Once operational, applicants may choose up to three (3) sites where they wish to reside. Once their choices are known the applicant's name will be listed on the appropriate CALB waiting lists. Applicants will be listed on the CALB waiting lists in sequence based upon:

- Applicable preference factors;
- Date and time of application.

Applicants from the CALB waiting list will be selected to form a final eligibility "pool" based on the units (including size and type) expected to be available after applicants complete the verification and screening process. HABC will offer the dwelling unit to eligible applicants at the top of the appropriate eligibility pool. Applicants will be housed in the first available unit as indicated by their preference.

Form 50900: Elements for the Annual MTW Plan and Annual MTW Report

APPENDIX J

(V) Sources and Uses of Funds

Annual MTW Plan

V.1.Plan.Sources and Uses of MTW Funds

A. MTW Plan: Sources and Uses of MTW Funds

Estimated Sources of MTW Funding for the Fiscal Year

PHAs shall provide the estimated sources and amounts of MTW funding by FDS line item.

Sources

FDS Line Item	FDS Line Item Name	Dollar Amount
70500 (70300+70400)	Total Tenant Revenue	\$23,640,998
70600	HUD PHA Operating Grants	\$270,181,951
70610	Capital Grants	\$26,343,485
70700 (70710+70720+70730+70740+70750)	Total Fee Revenue	\$0
71100+72000	Interest Income	\$85,051
71600	Gain or Loss on Sale of Capital Assets	\$0
71200+71300+71310+71400+71500	Other Income	\$2,270,314
70000	Total Revenue	\$322,521,800

Estimated Uses of MTW Funding for the Fiscal Year

PHAs shall provide the estimated uses and amounts of MTW spending by FDS line item.

Uses		
FDS Line Item	FDS Line Item Name	Dollar Amount
91000 (91100+91200+91400+91500+91600+91700+91800+91900)	Total Operating - Administrative	\$33,123,541
91300+91310+92000	Management Fee Expense	\$2,738,219
91810	Allocated Overhead	(\$806,518)
92500 (92100+92200+92300+92400)	Total Tenant Services	\$1,854,386
93000 (93100+93600+93200+93300+93400+93800)	Total Utilities	\$17,987,623
93500+93700	Labor	\$0
94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	\$34,797,415
95000 (95100+95200+95300+95500)	Total Protective Services	\$325,608
96100 (96110+96120+96130+96140)	Total insurance Premiums	\$3,452,429
96000 (96200+96210+96300+96400+96500+96600+96800)	Total Other General Expenses	\$8,640,129
96700 (96710+96720+96730)	Total Interest Expense and Amortization Cost	\$3,621,323
97100+97200	Total Extraordinary Maintenance	\$668,000
97300+97350	Housing Assistance Payments + HAP Portability-In	\$197,849,583
97400	Depreciation Expense	\$23,500,000
97500+97600+97700+97800	All Other Expenses	\$908,263
90000	Total Expenses	\$328,660,001

Describe the Activities that Will Use Only MTW Single Fund Flexibility

The following activities will take place in FY 2018 using single fund flexibility concept:

- HABC continues to use the prior year's MTW block grant reserve fund for renovation and development of UFAS units to meet the 504 accessibility requirements using single fund flexibility concept.
- Due to inadequate funding levels in FY 2017 of the Housing Choice Voucher Program (HCVP), HABC will use its MTW Single Fund Flexibility to fund and issue tenant-based vouchers to residents at O'Donnell Heights who must be relocated due to ground water penetration. HABC will issue the vouchers using Public Housing Operating Funds until HCVP funding levels are increased to fully cover the HAP expenses for the displaced residents.

V.2.Plan.Local Asset Management Plan	
B. MTW Plan: Local Asset Management Plan	
Is the PHA allocating costs within statute?	<input type="checkbox"/> or <input checked="" type="checkbox"/> No
Is the PHA implementing a local asset management plan (LAMP)?	<input checked="" type="checkbox"/> or <input type="checkbox"/>
If the PHA is implementing a LAMP, it shall be described in an appendix every year beginning with the year it is proposed and approved. The narrative shall explain the deviations from existing HUD requirements and should be updated if any changes are made to the LAMP.	
Has the PHA provided a LAMP in the appendix?	<input checked="" type="checkbox"/> or <input type="checkbox"/>
HUD has approved HABC's Local Asset Management Program as part of the Annual Plan submission since FY 2010. The proposed updated cost allocation calculations for FY 2018 are included in Appendix C. The indirect cost rate for 2018 will be 14.28% for MTW and 13.59% for non-MTW.	

Annual MTW Report

V.3.Report.Sources and Uses of MTW Funds
A. MTW Report: Sources and Uses of MTW Funds
Actual Sources and Uses of MTW Funding for the Fiscal Year
PHAs shall submit their unaudited and audited information in the prescribed FDS format through the Financial Assessment System - PHA (FASPHA), or its successor system
Describe the Activities that Used Only MTW Single Fund Flexibility
<div style="background-color: yellow; height: 100px;"></div>

V.4.Report.Local Asset Management Plan

B. MTW Report: Local Asset Management Plan

Has the PHA allocated costs within statute during the plan year?

Has the PHA implemented a local asset management plan (LAMP)? or

If the PHA is implementing a LAMP, it shall be described in an appendix every year beginning with the year it is proposed and approved. It shall explain the deviations from existing HUD requirements and should be updated if any changes are made to the LAMP.

Has the PHA provided a LAMP in the appendix? or

In the body of the Report, PHAs should provide a narrative updating the progress of implementing and operating the Local Asset Management Plan during the fiscal year.

V.5.Report.Unspent MTW Funds

C. MTW Report: Commitment of Unspent Funds

In the table below, provide planned commitments or obligations of unspent MTW funds at the end of the PHA's fiscal year.

Account	Planned Expenditure	Obligated Funds	Committed Funds
Type	Description	\$ X	\$ X
Type	Description	\$ X	\$ X
Type	Description	\$ X	\$ X
Type	Description	\$ X	\$ X
Type	Description	\$ X	\$ X
Type	Description	\$ X	\$ X
Type	Description	\$ X	\$ X
Type	Description	\$ X	\$ X
Total Obligated or Committed Funds:		0	0

In the body of the Report, PHAs shall provide, in as much detail as possible, an explanation of plans for future uses of unspent funds, including what funds have been obligated or committed to specific projects.

Note: Written notice of a definition of MTW reserves will be forthcoming. Until HUD issues a methodology for defining reserves, including a definition of obligations and commitments, MTW agencies are not required to complete this section.

Appendix K:
Office of Resident Services

MTW Annual Plan--2018

The Office of Resident Services

The mission of HABC's Office of Resident Services is to enhance the quality of life for public housing and Housing Choice Voucher Program residents of Baltimore City through the provision of individualized services that promote economic and personal self-sufficiency. To accomplish its goals, the Office of Resident Services coordinates and implements a vast array of programs and services to include: job search assistance and placement, social, health and other supportive services, literacy education, job training, youth activities and assistance to resident organizations.

Office of Resident Services Strategic Goals

Economic Self-Sufficiency – Enable residents to achieve economic self-sufficiency by providing opportunities for employment, training and increased income.

Personal Self-Sufficiency – Provide supportive services through service coordination and crisis intervention to stabilize households and help improve the overall quality of life.

Youth Development and Self-Sufficiency--Youth to live productive lives by obtaining skills and resources to prepare for the future.

Elderly and Persons with Disabilities – Expand initiatives to help improve the quality of life and to live independently.

Resource Development, Research and Technology – Seek, obtain and maintain resources at a level sufficient to accomplish and further the mission, goals and objectives of the Office of Resident Services.

Past Performance FY 2015 and 2016

The Office of Resident Services has been successful in meeting its overall performance goals as follows:

- People Accessing Continued Employment-employment program that assists residents with finding employment and retaining their employment.
Employment Services- 549; Job Placements—440; Average hourly wage: \$10.26
- Family Self-Sufficiency Program—assists families to achieve their goals of employment and long-term economic self-sufficiency. Families may remain in the program for up to five years. A major incentive is the payment of an escrow account upon graduation.
Average enrollment per year—550; Graduates—71; Average escrow payout--\$6,447
- Services to youth—a “cradle to career” approach is used to assure that youth become adults with a career path well planned.
Our House Early Head Start—98; Youth development activities—1,936
Youth Summit attendance—389
- Service Coordination—Service Coordinators assure that public housing families are living in stable conditions. Residents are referred for service to partnering service agencies to assist barriers. The overall goal is to improve the quality of life for residents.
Individuals served: 11,968
- Resource Development—this unit seeks and obtains grants for services to residents. During these years a series of grants resulted in \$5,950,759 for the Office of Resident Services and \$1,074,007 through Resident Services, Inc. the non-profit subsidiary of HABC.

New Initiatives—2018

In its never-ending quest for funding and additional services for housing residents, the Office of Resident Services will operate two new programs.

Jobs Plus Program—HABC was awarded a four year grant in the amount of \$2,498,734 to target services to the residents of Gilmor Homes that will result in long term, sustainable employment. Located in the Sandtown Winchester community of West Baltimore, Gilmor Homes is considered one of the most economically challenged family developments in HABC inventory. The term of this initiative is 9/26/16 through 9/25/2020 with the major components beginning in 2018.

MyGoals Family Self-Sufficiency Evaluation Project--This initiative is a three year evaluation project in coordination with the MDRC research corporation and includes the city of Houston, Texas. This is a new model to the traditional HUD Family Self-Sufficiency program that targets employment services to residents through new, state of the art job coaching techniques. Residents will receive monetary and other incentives as they progress successfully through the program. The base of operations will be 709 E. Eager St and will serve all public housing and HCVP families. The term of this program is 11/1/2016 through 10/31/2019 with the major component beginning in 2018.

Proposed program targets for self-sufficiency and supportive services for FY 2018 follow.

**Table 4
Residents Served in Economic Self-Sufficiency Programs**

Service Program Area	Projected # Residents Served	
Employment Services People Accessing Continued Employment (PACE)	Enrollment Total # Served	350
	Employment Services	700
	Job Placements	200
	Average Hourly Wage	\$10.00
	Skills Training	60
Youth Services (Ages 18 to 24)	Training	25
	Job Placements	20
	Average Hourly Wage	\$10.00
Family Self-Sufficiency	Total families Served	600
	Graduates	30
	New Escrow Accounts	35
	Home Ownership Education Sessions Attended	30
	Financial Literacy Management Education Sessions Attended	40
	Job Training	50

**Table 5:
Residents Served in Support Service Programs**

Service/Program Area	Projected # Residents Served
Service Coordination (residents assisted)	900
Service Referrals	1800
Congregate Housing Services Program	25
Our House Early Head Start program	57
Pre and Post Occupancy Training	500
Youth Services	250

I. Economic Self-Sufficiency (Adults and Older Youth)

Residents are provided opportunities for employment, training and increased income that enable them to achieve economic self-sufficiency. Programs that accomplish this goal are PACE, youth employment services and the Family Self-Sufficiency Program.

PACE (People Accessing Continued Employment)

The PACE Program provides employment readiness, skill assessment, job placement, retention services, case management, and training referral services to Public Housing and Housing Choice Voucher Residents. PACE envisions that all residents of Public Housing Communities and HCVP will become economically independent, successful, and self-sufficient through meaningful career-oriented employment with area businesses. PACE is also an Employment Network (EN) for the Social Security Ticket to Work Program targeting beneficiaries of SSI and/or SSDI who are seeking employment and are between the ages of 18 and 64. The Section 3 Program is another specialized employment initiative. Section 3 jobs are created when private companies and businesses are awarded contracts by Baltimore Housing to complete projects related to housing rehabilitation, construction, development, operation and modernization expenditures. In FY 2018, PACE will place residents who have completed skills training with permanent employment in lucrative job industries in the Baltimore area.

Youth Employment Services

The mission of the Youth Initiatives is to provide Baltimore City Public Housing and HCVP youth ages 18-24 with opportunities that will enable them to become productive, well-rounded, economically self-sufficient individuals. These youth initiatives provide skills assessment, career assessment, mentoring, life skills coaching, job training, tutoring, and education assistance to Baltimore City Public Housing and HCVP Youth. Staff will establish partnerships with the various training agencies to access skills training in a variety of occupations leading to employment.

Family Self Sufficiency

The Family Self-Sufficiency (FSS) program provides holistic goal-oriented case management services that lead to opportunities of self-sufficiency and economic independence for FSS families. Families receive home buying education to encourage homeownership. FSS is designed to assist residents in achieving economic independence and self-sufficiency through structured 5 year contract goals and case management. The major incentive of the program is an

escrow account linked to residents' increased rent payments due to employment. The escrow account allows the resident to save money which is disbursed when the goals of FSS Contract of Participation are successfully completed or the head of household has reached the fair market rent for their unit. HUD funds FSS coordinators for case management. All services are provided through partnerships linked through a required Program Coordinating Committee (PCC).

II. Personal Self-Sufficiency and Independence

Supportive services are provided through service coordination and crisis intervention to stabilize households and help improve the overall quality of life in public housing communities. Service Coordination, the Our House Family Early Head Start program, the Congregate Housing Services Program, and Pre and Post Occupancy training are key components under supportive services. Services to the elderly and persons with disabilities assist these residents to remain independent as they age-in-place.

Service Coordination

Supportive services to families are provided by Service Coordinators who work in the communities to coordinate services and collaborate with community service providers to arrange for service delivery to individuals and families. The Service Coordinators address a wide range of supportive services needs for adults, children, and persons with disabilities and seniors with the goal of assuring personal self-sufficiency for all families. A major component being added is financial counseling and eviction prevention services which will be performed by Guidewell Financial Solutions, a credit counseling service that will be on-site at the Eager Street location.

Pre and Post Occupancy Training

Pre and Post Occupancy Training gives residents an introduction to housing and the information needed for them to maintain their units and be good neighbors. The workshop format assists new and existing public housing residents in understanding the responsibilities of their lease, complying with the community service requirement, becoming self-reliant in the upkeep and maintenance of their units and being informed on the resources and programs that exist within their communities and Baltimore City. In FY 2018, ORS proposes to serve 500 residents through this training initiative.

III. Youth Services

Focusing on youth assures that youth living in public housing live productive lives by obtaining skills and resources to prepare for future self-sufficiency. Services are provided from birth to adult.

Twelve youth leadership clubs are in operation at various developments. The youth leaders receive training and enhanced support that encourages growth and sustainability. A sixth youth summit will be planned and implemented in collaboration with the Parents Against Drugs of HABC, Inc. The partnerships with the Boys and Girls Clubs of Metropolitan Baltimore and Living Classrooms for on-site youth programs will continue at O'Donnell Heights, Westport/Mt. Winans, Perkins Homes, Gilmor Homes and Pleasant View Gardens.

To assist in educational preparation and achievement, the Our House Early Head Start program serves families in the South Baltimore area. Partnerships with other early head and regular start programs around the City help assure that public housing students enter school ready to learn.

IV. Resource Development

The Office of Resident Services' Resource Development Unit will continue its efforts to identify and secure the resources needed to support the combined goals of both ORS and its affiliated non-profit, Resident Services, Inc. (RSI). Employing the combined capacities and synergies of the two organizations, Resource Development has set a goal of \$2 million in grant funding. In addition to the fiscal resources, Resource Development will continue to develop and establish partnerships and collaboration that will positively impact and add to the service delivery capabilities of the Office of Resident Services. This unit will also implement a compliance and monitoring component to assure quality of operation and adherence to grant guidelines.

Appendix L:
Information Technology

APPENDIX L

Information Technology

FY 2018 Annual Plan

In support of the MTW Annual Plan, HABC's Information Technology Department will undertake and/or complete the following initiatives in FY 2018:

HABC selected Emphasys Computer Solutions housing software, Elite for their Housing Enterprise Management System. The following modules went live on July 1, 2013, Low Income Public Housing (LIPH), the Public Housing Work Order module, and the Public Housing Waiting List. The Housing Choice Voucher Program went live on schedule, September 25, 2013.

In FY18 we will focus our efforts on staff training and expanding the use of the Housing Enterprise Management System by offering a Work Order Portal to the residents and Mobile Work Order devices to the maintenance staff.

Mobile Work Order Touch - The Elite Mobile Work Order Touch system is a complete paperless system designed to manage every step of the work order process. Each mobile unit is assigned to a maintenance worker and the assigned work orders are downloaded to the maintenance worker's mobile device as assigned by the supervisor. After the maintenance worker logs in, his/her assigned work orders are displayed on the screen. To complete tasks on the mobile device, the user simply touches the desired work order and the task screen is displayed. During the completion process, the maintenance worker will enter all the required information into the mobile device which is uploaded to the main system to update work order information.

Mobile UPCS Inspections - The Elite Mobile UPCS Inspections system is a complete inspection system designed to manage every step of the inspection process and fulfill REAC's inspection requirements. Each tablet unit is assigned to an inspector and the selected inspections are downloaded to the unit. After the inspector logs in, his/her scheduled inspections are displayed on the screen. To open an inspection, the user simply touches the desired unit and the inspection screen is displayed. During the inspection, the inspector enters all the required information into the tablet which is uploaded to the main system to update property or unit information, create work orders and generate letters.

We will install ten (10) Free Standing (Kiosks) in the lobby of the family developments for Residents in FY 2018. This will allow them to self-serve creating work orders through the eRes work order portal.

**Appendix M:
Non-MTW Information**

Appendix M

Non-MTW Sources and Uses of Funding

This section of the Annual Plan provides information on HABC's planned sources and uses of non-MTW HUD funds. This financial plan is compiled based on current as of February 2017. It is subject to revision as conditions and/or assumptions change. This section includes a summary of HABC's planned non-MTW activities, i.e. activities that do not specifically require use of MTW Agreement authority in order to be implemented.

A. Planned Sources and Uses of Other HUD Funds

This category of Non-MTW Sources and Uses include the following programs:

- Other Section 8 Programs include the Section 8 Veterans Affairs Supportive Housing (VASH), Moderate Rehabilitation, Substantial Rehabilitation and New Construction programs
- State and Local Programs
- Resident Opportunity Self Sufficiency (ROSS)
- Jobs Plus Program
- HOPE VI
- Partnership Rental Housing Programs (PRHP) market rate units,
- HABC's forced account (HABCo)
- Resident Service Grant (Our House-Friends of the Family).

Estimated Sources of Non-MTW Funding for FY 2018

Sources	
FDS Line Item Name	Dollar Amount
Total Tenant Revenue	\$ 1,689,927
HUD PHA Operating Grants	\$ 12,057,067
Capital Grants	\$ 15,370,996
Total Fee Revenue	\$ -
Interest Income	\$ 2,152
Gain or Loss on Sale of Capital Assets	\$ -
Other Income	\$ 7,901,565
Total Revenue	\$ 37,021,707

Notes to Sources:

1. Total Tenant Revenue is for PRHP market rate units managed by HABC's privatized firms.
2. HUD Operating Grants include the following:
 - Housing Assistance Payments (HAP) subsidies planned for Other Section 8 programs in the amount of \$10,877,788
 - Ongoing Administrative Fees Earned estimated in the amount of \$1,083,338
3. Interest Income is based on a short-term interest rate on estimated average daily cash balance for Other Section 8 programs.
4. Other Income includes the following:
 - HABC's construction and maintenance activities \$1,641,117.
 - ROSS grant activities from previously awarded grants \$648,988.
 - Jobs Plus \$740,148
 - State and Local activities \$3,317,991 primarily for the City of Baltimore instantaneous reimbursement of pass-through activities.
 - Business Activities \$947,775 for the Our House-Friends of the Family program, HABC's market rate units and \$596,196 in program income.

Estimated Uses of Non-MTW Funding for FY 2018

Uses	
FDS Line Item Name	Dollar Amount
Total Operating - Administrative	\$ 3,910,869
Management Fee Expense	\$ -
Allocated Overhead	\$ 806,518
Total Tenant Services	\$ 1,976,944
Total Utilities	\$ 228,073
Labor	\$ -
Total Ordinary Maintenance	\$ 2,420,351
Total Protective Services	\$ 55,928
Total Insurance Premiums	\$ 887,118
Total Other General Expenses	\$ 553,734
Total Interest Expense and Amortization Cost	\$ -
Total Extraordinary Maintenance	\$ -
Housing Assistance Payments	\$ 10,877,788
Depreciation Expense	\$ 780,000
All Other Expenses	\$ -
Total Expenses	\$ 22,497,324

Total Expenses	\$22,497,324
Less: Depreciation Expense	\$(780,000)
Capital Hard Cost	\$15,370,996
MTW Uses of Funds	\$37,088,320

Notes to Uses:

1. Administrative expenses include salaries and benefits to administer the Non-MTW programs. Also included in this expense category are office supplies, telephone, postage, and other computer materials and contracts.
2. Allocated Overhead is calculated based on HUD's approved Local Asset Management Program since FY 2010. The proposed updated cost allocation calculations for FY 2018 are included in Appendix C.
3. Tenant Services include salaries and benefits of employees for the ROSS grants, Youth Build grant, and Our House program. It also includes other materials and services as required by the grant agreements.
4. Ordinary Maintenance expenses are related to the City of Baltimore pass-through (non-capitalized) activities being performed by HABC's force-labor department (HABCo). HABC receives instantaneous reimbursement from the City for these activities.
5. Other General Expenses include applicable insurance premiums for workers compensation and applicable portions of compensating absence for the non-MTW programs.
6. Housing Assistance Payments (HAPs) include rent subsidies paid to landlords and utility assistance paid to tenants of Other Section 8 programs.

**Appendix N:
Amendments to the Annual Plan**

APPENDIX N

Amendments to the MTW Plan

Under the terms of the Moving to Work Agreement between HUD and HABC, HABC is required to prepare an MTW Annual Plan. The Annual Plan process includes an opportunity for public review and comment on HABC's proposed activities. Under certain circumstances, HABC may modify the Annual Plan over the course of the fiscal year. A public review process will be conducted when HABC proposes a significant amendment or modification to the then current approved Annual Plan.

The criteria for a significant amendment or modification to the MTW Annual Plan:

- The elimination of or reduction in programs or services to residents unless such reduction is the result of decreases to HABC funding; or
- The elimination of or reduction in funding due to the results of an authorized assessment of HABC's performance; or
- A material change in an approved policy that reduces services to residents unless such reduction is the result of decreases in HABC funding; or
- The adoption of a new policy pursuant to HUD authorized programs or regulations, or
- Additions of non-emergency work items when dollar amounts exceed 10% of the Capital Fund Budget or the amount of replacement reserve funds that exceed 10% of the annual Capital Fund Budget.
- The adoption of a new policy that requires MTW authority for implementation; or
- Significant changes to an existing MTW activity

The criteria for a substantial deviation and significant amendment or modification DO NOT include:

- A change in funding or other resources due to factors beyond the control of HABC;
- A change in programs, services or methods of administration or operation required by court order, regulatory or legislative changes, or directives from the funding sources; or
- A supplement or clarification to existing policies, programs or services.
- The decision to convert to either Project Based Rental Assistance or Project Based Voucher Assistance;
- The date the Significant Amendment is submitted to the HABC/HUD Plan website; and

- Changes to the Capital Fund Budget produced as a result of each approved RAD Conversion, regardless of whether the proposed conversion will include use of additional Capital Funds; and
- Changes to the construction and rehabilitation plan for each approved RAD conversion; and
- Changes to the financing structure for each approved RAD conversion.

Appendix: O
Changes Due to Comments Received

APPENDIX O
FY 2018 Annual Plan
Subsequent Changes to the Annual Plan Due to Comments Received

COMMENT	HABC RESPONSE
<p><u>1. HABC’s MTW Plan should be revamped to provide complete and accurate information to the public on its MTW activities and use of fungibility in a timely and transparent manner.</u></p> <p>The most critical piece of missing information relates to the use of fungibility to transfer funds from the HCV program and Replacement Housing Funds (RHF) to other uses. Neither the amount of the fund transfers, nor the specific uses of those funds are disclosed. These transfers raise important policy issues that Congress intended to be subject to public and resident input and to reflect local priorities. Because this information is not disclosed, neither the input, nor the local accountability intended by Congress is possible.</p>	<p><u>No change to the MTW Plan.</u></p> <p>HABC’s plans for use of its MTW Block Grant are disclosed in the chapter entitled, “Single Fund Flexibility”.</p>
<p><u>2. HABC’s MTW Plan should be revamped to provide complete and accurate information to the public on its MTW activities and use of fungibility in a timely and transparent manner.</u></p> <p>As another example, for each of the last several years, HABC’s MTW Plan has stated that it is informed by a “Portfolio Wide Asset Review.” However, the Plan does not describe the results of that review or how it informs the MTW Plan. The Portfolio Review itself has not been posted or otherwise been made available to stakeholders or the public.</p>	<p><u>The results of HABC’s Portfolio Wide Asset Review can be found in Appendix B. The following change has been made to the narrative of the Plan (page 6):</u></p> <p>Portfolio Planning – HABC will continue refining its ongoing portfolio assessment including assessing capital needs, developing a capital spending plan and strategy, (see page 25) and identifying a framework for future development activity. As a result of our findings in HABC’s portfolio wide asset review, we have updated the Asset Management table (Appendix B) to identify sites where redevelopment, conversion, homeownership, management improvements and other activities may take place in the future; however, it is subject to periodic change based on priorities and available resources. Both traditional and non-traditional sources of funding will be assessed including identifying ways in which MTW flexibility can be used to leverage and support reinvestment in HABC developments.</p>
<p><u>3. The MTW Plan does not provide a coherent HABC or City affordable housing strategy.</u></p> <p>As in past years, the 2017 draft Moving to Work Plan contains only a list of activities and recites the statutory objectives, but does not align the planned activities with those objectives or describe how they are related. The Plan appears to be treated as a <i>pro forma</i> check the box exercise in paperwork. This MTW Plan is virtually the same as last year and prior years and does not appear to have or informed by, or coordinated with, the Con Plan and/or Regional Housing Plan. Indeed, the MTW Plan is basically silent with regard to the Con Plan, the Analysis of Impediments and the Sustainable Communities Initiative</p>	<p><u>No change to the MTW Plan.</u></p> <p>Appendix A contains a document entitled; “Certification of Consistency with the Baltimore City Consolidated Plan” which sets forth specific sections of the Consolidated Plan developed in cooperation with HABC to including an analysis of impediments to fair housing.</p>

<u>COMMENT</u>	<u>HABC RESPONSE</u>
(SCI) Regional Housing Plan.	
<p><u>4. Work with stakeholders on a plan to address cost savings while minimizing adverse impacts on vulnerable families.</u></p> <p>We would have hoped to have seen a description in the MTW Plan of HABC’s contemplated response to the HUD budget situation so that stakeholders could respond and provide input through the MTW Plan process.</p>	<p><u>No change to the MTW Plan.</u></p> <p>The writer is invited to discuss this topic at one of the regularly scheduled meetings between HABC and Baltimore City’s housing advocates.</p>
<p><u>5. Instead, as a major step toward cost savings, HABC must stop over-subsidizing HCV landlords by paying above market HCV rents.</u></p> <p>The potential budget cuts make it clear that HABC can no longer afford (if it ever could) to over-subsidize landlords in lower rent areas. Rather than impose across the board reductions in payment standards, HABC should reduce payment standards in lower rent areas to 90% of FMR or less (which under MTW does not require HUD approval.) Higher payment standards should be left in place for higher rent Opportunity Areas (or Regional Choice areas under the City’s Housing Market Typology).</p>	<p><u>No change to the MTW Plan.</u></p> <p>The writer is invited to discuss this topic at one of the regularly scheduled meetings between HABC and Baltimore City’s housing advocates.</p>
<p><u>6. HABC should invest its capital resources in replacement housing and stop the diversion of RHF funds to other uses.</u></p> <p>The MTW Demonstration allows Replacement Housing Factor Funds (RHF) to be fungibly used for other purposes. But our analysis of Appendix H, the Annual Statement/Performance and Evaluation Report, suggests that HABC has abused this flexibility. Of the total reported \$104,740,000,404 received by HABC over FY 2010 to FY 2016, only \$17,456,734, or about 17%, is reported to have been used for “Development Activities.” The balance of the funds has not gone into preservation activities that extend the useful life of HABC’s remaining family inventory. HABC has not undertaken a comprehensive modernization of any of its remaining family developments since the late 1990’s and has almost completely disinvested in its scattered site inventory. Instead, CF/RHF and diverted HCV funds have been used for non-capital repairs and extraordinary maintenance activities in projects that within only a few years were slated for demolition or conversion to RAD.</p>	<p><u>No change to the MTW Plan.</u></p>
<p><u>7. HABC can no longer afford to divert Housing Assistance Payments funds to non-HCV uses.</u></p> <p>Virtually every year, HABC diverts millions of Housing Assistance Payment (HAP) funds out of the Housing Choice Voucher (HCV) program and into other uses that do not add to HABC’s ability to serve families. Generally, neither the amount nor the uses are disclosed in the MTW Plan, but the amounts have been sufficient to house hundreds of additional families, and the uses apparently range from repairs to public housing to prepayment of bond debt for public housing to prepayment of pension</p>	<p><u>Please note HABC’s response below.</u></p> <p>The writer is incorrect when stating that “every year, HABC diverts millions of HAP funds out of the HCVP and into other uses that do not add to HABC’s ability to serve families.” While HAP funds have not been converted since 2006, HABC reserves the right to exercise its single fund flexibility in the future as necessary and in accordance with its MTW Agreement.</p> <p><u>Changes to the narrative on page 23:</u></p>

<u>COMMENT</u>	<u>HABC RESPONSE</u>
<p>obligations.</p> <p>Once again, this MTW Plan obliquely indicates that HABC intends to use fungibility to use an unspecified amount of HAP for FY 2018 and prior years for capital purposes (see p. 23). Based on planned voucher leasing at a level of 323 units below the 13,500 regular vouchers for which HABC says it is funded, we estimate the diversion of HAP to be between \$3 and \$4 million.</p>	<p>In 2006, HABC used its MTW authority to allocate Housing Choice Voucher (HCV) funds to complete planned capital activities. HABC used the funds to renovate long-term vacant units, to modify units for handicap accessibility and to improve physical conditions to ensure long term viability of existing inventory. These funds have been fully committed since 2014 and are expected to be fully expended by the end of FY 2017.</p>
<p><u>8. We support HABC’s addition of a new HCV set-aside for families with young children.</u></p> <p>HABC has included a new Housing Choice Voucher set-aside for families with young children (“Early Childhood Set-Aside”) in the FY 2018 MTW Plan. This set-aside would augment several already existing set-asides which mostly serve households without minor children. Up to 250 vouchers will be set aside and issued to families on the HCV waiting list who are identified as having young children, and who agree to participate in a mobility counseling program to be administered by the Baltimore Regional Housing Partnership, with seed funding provided by HABC. We very much appreciate HABC’s decision to move forward with this demonstration, and anticipate working closely with HABC to plan for its implementation and to garner additional funding support.</p>	<p><u>No change to the MTW Plan.</u></p>
<p><u>9. HABC should clearly identify its suggested alterations of its policies and procedures to allow for full public comment.</u></p> <p>HABC through its MTW Plan and Administrative Plan outlay numerous suggested policy changes that would result in significant changes to the eligibility, rights, and remedies of applicants and residents of HABC programs. HABC has buried these changes within these reports, thus obscuring significant alterations in HABC policies and procedures. HABC should instead clearly identify its suggested alterations to allow for full public comment.</p>	<p><u>No change to the MTW Plan.</u></p> <p>In the future, non-MTW items will be highlighted in the Plan.</p>
<p><u>10. As a Moving To Work jurisdiction, HABC is statutorily required to tailor its policies and procedures to increase housing opportunities for Baltimore City’s low-income families.</u></p> <p>We are concerned about HABC’s current plans for its housing stock and request additional information, measurable goals, and clear policies governing the future of HABC’s housing stock.</p>	<p><u>No change to the MTW Plan.</u></p>
<p><u>11. HABC should reconsider its plans to dispose of or demolish 456 scattered site units in FY 2018.</u></p> <p>HABC receives a substantial allocation of Replacement Housing Factor funds each year, which is intended to be used for replacement housing development. If it is not financially feasible to retain these scattered site units, we ask that HABC use its RHF funds to do 1:1 replacement</p>	<p><u>No change to the MTW Plan.</u></p> <p>HABC is under no obligation to do 1:1 replacement housing and the writer is also mistaken in thinking that RHF funds will accomplish this goal. The amount of RHF funds that HABC receives equates to \$1200 per unit while the Physical Needs Assessment (PNA) reveals that the cost to renovate these units averages</p>

COMMENT	HABC RESPONSE
<p>housing in line with HABC’s obligations.</p>	<p>\$250,000 per unit.</p> <p>Additionally in Federal Fiscal Year 2017, HABC will no longer receive RHF funds. HUD has eliminated this grant and replaced it with the Demolition/Disposition grant which will be included in the Capital Fund and can be used for redevelopment.</p>
<p><u>12. HABC states that it began to purge the public housing waiting list in March 2016 but stopped after 45% of applicants did not respond to outreach attempts. We request additional information about how many applicants were purged before the process was suspended.</u></p> <p>We want to know whether HABC contacted applicants’ emergency contacts prior to purging anyone. We also request that HABC undertake an initiative to coordinate with the Mayor’s Office of Homeless Services to try to find contact information for applicants who may be homeless or otherwise engaged with HMIS or Coordinated Access. We believe that many of the individuals who were called up and did not respond were on the mixed population waiting list and may be homeless.</p>	<p><u>No change to the MTW Plan.</u></p> <p>The writer is invited to discuss this topic at one of the regularly scheduled meetings between HABC and Baltimore City’s housing advocates.</p>
<p><u>13. We are deeply concerned that HABC indicates in its MTW Plan that it will not continue to incentivize developers to create deeply affordable units for non-elderly persons with disabilities.</u></p> <p>We understand that HABC is facing a budget shortfall, but the Authority continues to have a duty to affirmatively further fair housing under the FHA, and increase housing choices as a MTW jurisdiction. We urge HABC to offer creative incentives to project-base units for the vulnerable populations, including individuals with disabilities and those who are homeless.</p>	<p><u>No change to the MTW Plan.</u></p>
<p><u>14. Section 811 supportive housing development is essential to HABC’s statutory obligation to increase housing choice for low-income families. However, HABC reports it has discontinued its 811 supportive housing development incentives due to a lack of developer interest.</u></p> <p>We request more information on why HABC thinks developers are uninterested in these programs. We request that HABC include in its Summer 2017 NOFA that developers may commit to project-basing using 811 occupancy subsidies as one method of complying with the threshold NOFA criteria. HABC permitted developers to do this in 2016, and at least one developer agreed to provide 811 units as part of its application for HOME funds.</p>	<p><u>No change to the MTW Plan.</u></p> <p>This is not an HABC activity, but rather a City activity. HABC does not control this NOFA. The writer is invited to discuss this topic at one of the regularly scheduled meetings between HABC and Baltimore City’s housing advocates.</p>
<p><u>15. HABC reports it plans to implement a third party billing feature for residents with “excessive consumption charges.” The nature of this policy change, its projected cost effectiveness, its procedures,</u></p>	<p><u>No change to the MTW Plan.</u></p> <p>This is not an MTW activity.</p>

<u>COMMENT</u>	<u>HABC RESPONSE</u>
<p><u>and participants' rights are left unaddressed by HABC.</u> We request that HABC adopt and announce in its Plan an affirmative policy to guarantee residents the right to grieve utility bills under the new policy, as well as a clear statement from HABC that it will continue to accept rent payments from residents if utility bills are being contested or aren't paid. We also request that HABC adopt a clear policy that such utility charges are not rent and late fees can't be applied for non-payment. Finally, we request HABC provide additional information and explanations of why third party billing for utility charges meets one of HABC statutory obligations under the MTW program.</p>	
<p><u>16. HABC is obligated under federal regulations, 24 C.F.R. 982.206, to provide public notice regarding certain actions. The proposed revisions are contrary to this requirement by changing an obligation, into a discretionary decision. Further, HABC is obligated to perform such notice in a manner consistent with its Fair Housing obligations.</u> Public notice in certain instances is not discretionary for HABC. The proposed language would alter that and make the planned outreach subject to discretion on the part of HABC. The administrative plan should reflect HABC's requirement, and commitment to provide notice, and describe how that outreach will be done. <i>Ad hoc</i> decisions on notice and outreach are particularly ineffective in reaching audiences and the vague discretionary language proposed by HABC encourages just that sort of <i>ad hoc</i> decisions.</p>	<p><u>No change to the MTW Plan.</u> HABC will continue to comply with all provisions under 24 CFR 982.206 when opening a waiting list; however once the waiting is open HABC will use its discretion about whether or not to publicize and disseminate information to make known the availability of housing assistance and related services for eligible families.</p>
<p><u>17. HABC should not use debt screening to penalize past residents when it is impossible for HABC to legally collect on a debt.</u> HABC should permit applicants who owe debts greater than three (3) years old to be eligible for admission into HABC's HCV Program.</p>	<p><u>No change to the MTW Plan.</u></p>
<p><u>18. We oppose HABC's proposed imposition of minimum rent.</u> HABC's increase of the minimum rent from \$0 to \$25 places an unnecessary burden on the poorest participants in HABC's programs. Baltimore City has approximately 152,000 Failure to Pay rent actions every year. This constitutes approximately 1/3 of all rent court actions in the State of Maryland. A minimum rent imposes a real threat of increase in the number of failure to pay rent actions filed against the most vulnerable and destitute HCV participants.</p>	<p><u>No change to the MTW Plan.</u></p>
<p><u>19. We oppose changing the word 'adult' to 'person.'</u> HABC's policy overlooks custody arrangements for children who may be in a parent's household for more than 90 days, but less than 180. HABC will only add a child as a household member if they are in the unit at least 180 days a year. Consequently, HABC penalizes participants who have 'persons', which included children, in their units for</p>	<p><u>No change to the MTW Plan.</u> This change does not affect children in the unit under a custodial arrangement. This change only affects persons who are unauthorized occupants of the unit.</p>

<u>COMMENT</u>	<u>HABC RESPONSE</u>
more than 90 days but less than 180 because of custodial arrangements.	
<p><u>20. HABC should continue to review separate agreements between the landlord and tenant.</u> To deter fraudulent side agreements that cause tenants to pay more than that the statutorily mandated amount in rent, HABC should encourage side agreements to be made transparently so that there is not fraudulent actions that compromise the integrity of HABC’s HCV Program.</p>	<p><u>No change to the MTW Plan.</u> HABC will continue to inform landlords in the HCV Program that it is a violation of HUD regulations and the HAP contract to enter into side agreements with participants.</p>
<p><u>21. HABC cannot add a cause for termination or family obligation to the HCV Program for refusing to permit entry to a landlord.</u> The causes for termination from the HCV program are enumerated in 982.551-53.</p>	<p><u>No change to the MTW Plan.</u></p>
<p><u>22. We are very confused how HABC reached its conclusion that arrests may be used as evidence of criminal activity with the unambiguous guidance provided by PIH 2015-</u> HABC asserts that it will rely on arrest records as evidence of criminal activity to terminate assistance, 14-1 and 15-10, or deny admission until disposition of the arrest, 15-8. However, the PIH 201519 notice was explicit and unambiguous: “An arrest record can trigger an inquiry into whether there is sufficient evidence for a PHA or owner to determine that a person engaged in disqualifying criminal activity, but is <i>not</i> itself evidence on which to base a determination.”</p>	<p><u>No change to the MTW Plan.</u> HABC will not use arrest records solely as a basis for termination of participation. Any termination in the HCVP is based on a preponderance of the evidence which is consistent with PIH Notice 2015-19.</p>
<p><u>23. We oppose HABC’s revision that would permit, but not require, HABC to deny assistance to an applicant.</u> First, the discretionary ‘may’ is meaningless for purposes of determining eligibility. It only indicates that HABC has discretion and that it ‘may’ or ‘may not’ deny eligibility. The purpose of the regulation is to require HABC to make policy regarding past evictions from public housing, not to avoid making policy.</p>	<p><u>No change to the MTW Plan.</u></p>
<p><u>24. HABC should adopt a waiting list preference for applicants experiencing homelessness on the HCVP and Public Housing waiting lists, as well as for Transitional Housing tenants on the Project-Based Voucher and Public Housing waiting lists</u> HABC should create local preferences to target its scarce resources to the most vulnerable applicants on the waiting list. HABC has already established local preferences for families with children, non-elderly persons with disabilities, and seniors.</p>	<p><u>No change to the MTW Plan.</u></p>
<p><u>25. HABC should establish VAWA policies that give the agency flexibility to exercise discretion in favor of VAWA victims</u> We recommend several changes to the language of</p>	<p><u>No change to the MTW Plan.</u></p>

<u>COMMENT</u>	<u>HABC RESPONSE</u>
HABC's new VAWA policy to ensure consistency with federal law.	
<p><u>26. HABC should continue to inquire whether HCVP applicants require any reasonable accommodations</u></p> <p>In proposed Section 1.10.3, HABC has removed language regarding questions on the HCVP application about needed reasonable accommodations. This deletion suggests that HABC will no longer inquire in the HCVP application whether the applicant household requires any reasonable accommodations.</p>	<p><u>No change to the MTW Plan.</u> The following is HABC’s proposed language:</p> <p>“HABC staff will interview Applicants in order to review the information on the application form. Verification of disability as it relates to 504, Fair Housing, or <i>the Americans with Disabilities Act (ADA)</i> reasonable accommodation will be requested at this time.”</p>
<p><u>27. Denying an applicant for money owed to a landlord exceeds the scope of HABC's authority</u></p> <p>In Section 2.8.1, HABC proposes to conduct EIV screening for new applicants "to identify former residents of federally assisted rental program who ... owe money to a PHA or to a landlord as a result of participation in a HCV Program." Although federal regulations governing the HCVP allow a PHA to deny program assistance "[i]f the family currently owes rent or other amount to the PHA or to another PHA in connection with Section 8 or other public housing assistance," federal regulations do not allow a PHA to deny assistance for debts owed to a non-PHA landlord. 24 C.F.R. § 982.552. HABC should, therefore, remove the references to debts owed to a landlord in this section.</p>	<p><u>Please note HABC’s response below.</u> A “non-PHA landlord” is one who does not have a HAP contract with a PHA. Since HABC has already stated that EIV screening will be conducted for new applicants "to identify former residents of federally assisted rental program who ... owe money to a PHA or to a landlord <u>as a result of participation in a HCV Program.</u>”, no changes to the plan are necessary; however, HABC will make the following changes to the HCVP Administrative Plan to clarify the narrative:</p> <p><i><u>Current language:</u> If the applicant family has current debt to HABC or another PHA or a judgment against them in connection with participation in the HCVP or public housing assistance under the 1937 Act for amounts paid to an owner under a HAP contract for rent, damages to the unit or other amounts owed by the applicant family under a lease...</i></p> <p><i><u>Revised language:</u> If the applicant family has current debt to HABC or another PHA or a judgment against them in connection with participation in the HCVP or any other public housing assistance under the 1937 Act for amounts paid <u>to a HCVP (“Section 8”) landlord or owner</u> under a HAP contract for rent, damages to the unit or other amounts owed by the applicant family under a lease...</i></p>
<p><u>28. Proposed changes to subsidy standard policy regarding determination of family unit (voucher) size will have a negative impact on students</u></p> <p>HABC proposes in its FY 2018 HCVP Admin Plan to require that space may be provided only for a <i>full time</i> student who is away at school but who lives with the family during breaks. <i>See</i> FY 2018 HCVP Admin Plan at 5-9. It is unnecessary and harmful to restrict this provision only to full-time students, rather than all children who are away at school.</p>	<p><u>Please note HABC’s response below.</u> HABC deleted any revisions to this provision in the HCVP Administrative Plan. The narrative is the same as last year which states:</p> <p>Space may be provided for a student who is away at school but who lives with the family during school recesses, provided that it does not result in an otherwise unused room.</p>
<p><u>29. HABC should use the clear language in PIH Notice 2016-05 Attachment E to describe the current policy regarding exclusion of earned income from rent determinations for persons with disabilities</u></p>	<p><u>No change to the MTW Plan.</u></p>

COMMENT	HABC RESPONSE
<p>HABC's proposed language reflecting mandatory changes to the earned income disregard for persons with disabilities is unclear and confusing. HABC should simply include the following language from PIH Notice 2016-05 Attachment E.</p>	
<p>30. <u>HABC lacks authority to restrict removal of household members</u> In Section 6.6.4, HABC has added language requiring that any request to remove a household member with a history of criminal activity must be made within thirty calendar days of the incarceration or arresting action or the household member. HABC also inserted language clarifying that such a request to remove a household member will be considered on a case by case basis. It is not clear what authority HABC has to refuse a participant's request to remove a household member or to require that such a request be made within a certain timeframe.</p>	<p><u>No change to the MTW Plan.</u></p>
<p>31. <u>If an adult who is brought into the assisted unit to care for a remaining minor child does not pass tenant screening protocol, HABC should allow another adult to be identified.</u> Proposed language in the FY 2018 HCVP Admin Plan purportedly clarifies HABC's current policy by providing that when an adult is to be brought into a household to enable a minor child to continue to receive assistance as a remaining family member, "[a]ny additional family member must follow tenant screening protocol dictated in this Administrative Plan." FY 2018 HCVP Admin Plan at 8-8. HABC should also explicitly state that if such an adult fails to satisfy tenant screening protocol, HABC will allow social services or the Juvenile Court to arrange for an alternative adult to be brought into the assisted unit to care for the child, rather than terminating assistance to the minor child.</p>	<p><u>No change to the MTW Plan.</u></p>
<p>32. <u>HABC should include unsecure or broken windows in the list of emergency repair items</u> HABC proposed to add two types of repair items to its list of items considered of an emergency nature, rat infestations and unsecure exterior doors. We propose that the latter item be edited to include "unsecure or broken exterior doors or windows."</p>	<p><u>HABC has accepted this change.</u></p>
<p>33. <u>HABC should remove proposed language on Allowable Moves and Restrictions on Moves until such time as the workgroup discussing these issues has completed its work</u></p>	<p><u>No change to the MTW Plan.</u></p>
<p>34. <u>HABC lacks authority to terminate lifetime registered sex offenders who are already admitted to the HCVP.</u> In its Draft Plan, HABC proposes adding language that would mandate immediate termination if a participant who is subject to a lifetime sex offender registration requirement "was erroneously admitted into a federal housing program after June 25, 2001 and is found to be receiving housing</p>	<p><u>No change to the MTW Plan.</u></p>

<u>COMMENT</u>	<u>HABC RESPONSE</u>
assistance." FY 2018 Draft Admin. Plan at 15.2.2. This proposal is unlawful and should be removed.	
<p><u>35. HABC should clarify what documentation will be accepted as proof of successful completion of a supervised drug rehabilitation program</u></p> <p>The proposed language is unclear and should be clarified to explain what documentation will be accepted.</p>	<u>No change to the MTW Plan.</u>
<p><u>36. HABC should maintain its current three-year screening period for prior evictions from federally assisted housing.</u></p> <p>While there is permissive authority, there is no mandatory requirement. In order to defend its restrictive changes, HABC should point to some larger problems that have arisen from its current three-year policy. As best HPRP can tell, there have been no identified issues with applicants or recipients who have been previously evicted less than five years but more than three years.</p>	<u>No change to the MTW Plan.</u>
<p><u>37. Project-based transitional housing does not increase housing choice</u></p> <p>We urge HABC to conduct more oversight of the project-based transitional housing programs as we continue to see numerous problems including onerous program rules, lack of meaningful supportive services, and arbitrary standards for tenant-based voucher referrals.</p>	<u>No change to the MTW Plan.</u>
<p><u>38. HABC should restore the \$5000 maximum for payment agreements</u></p> <p>In Section 17.2, HABC proposes to reduce the maximum amount for which it will enter into a payment agreement from \$5000 to \$2500. Federal law does not require such a reduction and HABC provided no rationale or justification for the reduction. We therefore urge HABC to restore the current \$5000 maximum, as this provides more options and flexibility to households to enter into a payment agreement while maintaining their HCVP participation.</p>	<u>No change to the MTW Plan.</u>
<p><u>39. HABC's Authority to Enforce Resident Rights and Protections in RAD Should Be Described in the Annual Plan and Appendices.</u></p> <p>The FY2018 Plan should adequately note where HABC has the obligation and ability to enforce resident rights. This includes: (1) providing details on how HABC will continue to fulfill its obligations to consult residents, discuss all substantial changes with them, and provide for resident comments and written responses throughout the RAD conversion process (see HUD Notice PIH 2012-32 (HA), REV-3 at 83-85); and (2) describing the transactional documents utilized in the RAD transactions, and how each allows HABC to contribute to the long-term enforcement and oversight of these units post-conversion.</p>	<u>No change to the MTW Plan.</u>
<u>40. HABC Should Provide Clear and Accurate</u>	<u>Please note HABC's response below.</u>

COMMENT	HABC RESPONSE
<p>Information About RAD Site Statuses Within the FY2018 MTW Plan, HABC provides limited information about the status of RAD sites that are still undergoing the application process. We recommend that current, detailed information about the RAD sites be made available in this and subsequent MTW Annual Plans.</p> <p>Broadway Overlook. The FY2018 MTW Plan also lists the Broadway Overlook property as “closed.” As of 3/30/2017, this property is still listed on HUD’s website as being in the “CHAP issued” phase, not yet having submitted its financing application.</p> <p>Hollander Ridge. Instead of simply listing site-selection criteria, HABC should provide more clear information about the potential sites, neighborhoods, or regions in which it hopes to site these units.</p> <p>J. Van Story Branch. More information is needed about the funds that will be utilized for gap financing on this project. Specifically, the FY2018 MTW Plan should include detailed information about the proposed repairs to the elevators, and how those plans may or may not change should the RAD conversion fail to take place. This information is necessary for stakeholders to provide feedback on the plans for this site.</p> <p>Somerset Extension. A clear and detailed accounting of the issues that HABC is facing with regard to the RAD application for this site is needed. Additionally, HABC should expand on how it intends to “strategize for extraordinary maintenance issues” with the underground water leaks, especially including any proposed plans should the RAD conversion fail to take place.</p>	<p>Broadway Overlook: The status of Broadway Overlook has been changed from “closed” to “pending”. See page 34.</p> <p>Hollander Ridge: The requested information is not known at this time.</p> <p>J. Van Story Branch: The following narrative was added to Section II.B.: New Housing Choice Vouchers to be Project-Based Vouchers During the Fiscal Year This new construction project is located at 213 -215 Park Avenue and 208 Liberty Street in Baltimore. The project will provide seventy-one (71) units of affordable housing and of those, 14 units will be reserved for tenants with incomes of 30% or less than the AMI. L on Liberty agreed to add 3 more NEDs units for a total of 14 NEDs units. These 3 additional units are in exchange for the reduction of units in J. Van Story Branch to create a third elevator in the building.</p> <p>Somerset Extension: No change to the Plan.</p>
<p>41. <u>HABC Should Ensure that Each Annual Plan is a Clear and Informative Presentation of Information.</u> Each MTW Annual Plan provided by HABC should contain information that is accurate and is presented in a clear and precise manner, in order to adequately articulate the general strategy and specific information contained therein.</p>	<p><u>No change to the MTW Plan.</u></p>
<p>42. <u>All HABC Annual Plans Should Provide Accurate Information and Analysis.</u> HABC should strive to update the information it provides in all MTW Annual Plans, especially when such information has become available or taken effect before the first draft of the Plan is made public.</p>	<p><u>No change to the MTW Plan.</u></p>
<p>43. <u>All HABC Annual Plans Should Utilize Clear Organization and Precise Language.</u> Additionally, the HABC MTW Annual Plans often present information in a manner that does not allow for easy comprehension of overall portfolio strategy or complete details about a given program or site. HABC can and should make two specific changes to its approach to MTW Annual Plans, beginning with the FY2018 MTW Annual</p>	<p><u>No change to the MTW Plan.</u></p>

<u>COMMENT</u>	<u>HABC RESPONSE</u>
Plan: (1) reader-friendly organization; and (2) greater precision of language.	
<p data-bbox="168 296 834 422">44. <u>Visitors. The proposed language here names all persons as visitors for the limitations on consecutive and cumulative visits per year, as opposed to solely naming adults as visitors.</u></p> <p data-bbox="168 426 834 672">This change should not be made. If this policy applies to children, it may unduly burden families in their efforts to find reliable and safe childcare. Additionally, this policy creates an unrealistic administrative burden; it is unconscionable to presume that families should acquire or owners should be required to obtain proof of identity for those in the age of minority. Without proof of identity, this rule seems unenforceable.</p>	<p data-bbox="860 296 1211 323"><u>No change to the MTW Plan.</u></p>
<p data-bbox="168 682 659 709">45. <u>Missed Appointments and Deadlines.</u></p> <p data-bbox="168 714 834 804">Medical or Family Emergencies should continue to be an absolute reason for missing an appointment. This should not be changed to a permissive standard.</p>	<p data-bbox="860 682 1211 709"><u>No change to the MTW Plan.</u></p>

**Appendix P:
The Public Participation Process**

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and state, March 3, 2018, Cassandra Stanback
personally know to me, whom being dully sworn,
states as follows: That Cassandra Stanback is an employee
of "The Afro-American Newspapers" and that said
publication(s) carried the attached advertisement

2nd Amendment Plan

Signature

Notary Public Signature

DIANE WILLIAMS HOCKER
NOTARY PUBLIC STATE OF MARYLAND
My Commission Expires 2020

HOUSING AUTHORITY OF BALTIMORE CITY NOTICE OF A SECOND AMENDMENT TO THE FY 2018 MTW ANNUAL PLAN

The Housing Authority of Baltimore City ("HABC") is providing notice of a second amendment to its FY 2018 Moving To Work Annual Plan (the "Plan") that was originally submitted to the U.S. Department of Housing and Urban Development ("HUD") after public comment on April 12, 2017.

AVAILABILITY OF PROPOSED AMENDMENT:
The proposed second amendment to the FY 2018 Plan is available for review and inspection by the public at HABC's central office located at 417 E. Fayette Street, Suite 1317, Baltimore, MD 21202. Please call Ms. Joyce Stewart at 410-396-1810 to make arrangements to review the second amendment to the MTW Plan. A copy of the amended Plan is also available for review on the HABC website at www.baltimorehousing.org and at the following locations:

*HABC Rental & Assisted Housing Office
1225 West Pratt Street
Baltimore, MD 21223

*The Enoch Pratt Free Public Library
The Maryland Room, Main Branch
400 Cathedral Street
Baltimore, MD 21201

*The Management Offices at all HABC-Owned public housing developments.

PUBLIC MEETING:
A public meeting will be held Thursday, March 22, 2018 at 6:00 p.m. in the Auditorium at Pleasant View Gardens, 201 N. Aisquith Street, Baltimore, MD 21202. The purpose of the meeting is to receive comments from HABC residents, community leaders, and interested members of the public on the proposed amendment to the Plan. The location for the public meeting is handicapped-accessible and an American Sign Language interpreter will be present.

Appendix Q:
Gilmor Homes Units for Demolition

**Appendix Q
List of Gilmor Homes Units Proposed for Demolition**

Unit Count	Development	Address	Building #
1	Gilmor Homes	1601 Spray Ct 1	20
2	Gilmor Homes	1601 Spray Ct 2	20
3	Gilmor Homes	1601 Spray Ct 4	20
4	Gilmor Homes	1601 Spray Ct 5	20
5	Gilmor Homes	1601 Spray Ct 6	20
6	Gilmor Homes	1601 Spray Ct 7	20
7	Gilmor Homes	1601 Spray Ct 8	20
8	Gilmor Homes	1603 Spray Ct 1	20
9	Gilmor Homes	1603 Spray Ct 3	20
10	Gilmor Homes	1603 Spray Ct 4	20
11	Gilmor Homes	1603 Spray Ct 5	20
12	Gilmor Homes	1603 Spray Ct 6	20
13	Gilmor Homes	1603 Spray Ct 7	20
14	Gilmor Homes	1603 Spray Ct 8	20
15	Gilmor Homes	1605 Spray Ct 1	20
16	Gilmor Homes	1605 Spray Ct 2	20
17	Gilmor Homes	1605 Spray Ct 3	20
18	Gilmor Homes	1605 Spray Ct 4	20
19	Gilmor Homes	1605 Spray Ct 5	20
20	Gilmor Homes	1605 Spray Ct 6	20
21	Gilmor Homes	1605 Spray Ct 7	20
22	Gilmor Homes	1605 Spray Ct 8	20
23	Gilmor Homes	1600 Spray Ct 1	21
24	Gilmor Homes	1600 Spray Ct 4	21
25	Gilmor Homes	1600 Spray Ct 5	21
26	Gilmor Homes	1600 Spray Ct 6	21
27	Gilmor Homes	1600 Spray Ct 7	21
28	Gilmor Homes	1600 Spray Ct 8	21
29	Gilmor Homes	1600 Spray Ct 8	21
30	Gilmor Homes	1602 Spray Ct 1	21
31	Gilmor Homes	1602 Spray Ct 3	21
32	Gilmor Homes	1602 Spray Ct 4	21
33	Gilmor Homes	1602 Spray Ct 5	21
34	Gilmor Homes	1602 Spray Ct 6	21
35	Gilmor Homes	1602 Spray Ct 7	21
36	Gilmor Homes	1602 Spray Ct 8	21
37	Gilmor Homes	1604 Spray Ct 1	21
38	Gilmor Homes	1604 Spray Ct 3	21

Appendix Q
List of Gilmor Homes Units Proposed for Demolition

Unit Count	Development	Address	Building #
39	Gilmor Homes	1604 Spray Ct 4	21
40	Gilmor Homes	1604 Spray Ct 5	21
41	Gilmor Homes	1604 Spray Ct 6	21
42	Gilmor Homes	1604 Spray Ct 7	21
43	Gilmor Homes	1604 Spray Ct 8	21
44	Gilmor Homes	1604 Spray Ct. 2	21
45	Gilmor Homes	1601 Bruce Ct 1	29
46	Gilmor Homes	1601 Bruce Ct 2	29
47	Gilmor Homes	1601 Bruce Ct 3	29
48	Gilmor Homes	1601 Bruce Ct 4	29
49	Gilmor Homes	1601 Bruce Ct 5	29
50	Gilmor Homes	1601 Bruce Ct 6	29
51	Gilmor Homes	1603 Bruce Ct 1	29
52	Gilmor Homes	1603 Bruce Ct 2	29
53	Gilmor Homes	1603 Bruce Ct 3	29
54	Gilmor Homes	1603 Bruce Ct 4	29
55	Gilmor Homes	1603 Bruce Ct 5	29
56	Gilmor Homes	1603 Bruce Ct 6	29
57	Gilmor Homes	1603 Bruce Ct 7	29
58	Gilmor Homes	1603 Bruce Ct 8	29
59	Gilmor Homes	1605 Bruce Ct 1	29
60	Gilmor Homes	1605 Bruce Ct 2	29
61	Gilmor Homes	1605 Bruce Ct 3	29
62	Gilmor Homes	1605 Bruce Ct 4	29
63	Gilmor Homes	1605 Bruce Ct 5	29
64	Gilmor Homes	1605 Bruce Ct 6	29
65	Gilmor Homes	1607 Bruce Ct 1	30
66	Gilmor Homes	1607 Bruce Ct 2	30
67	Gilmor Homes	1607 Bruce Ct 3	30
68	Gilmor Homes	1607 Bruce Ct 4	30
69	Gilmor Homes	1607 Bruce Ct 5	30
70	Gilmor Homes	1607 Bruce Ct 6	30
71	Gilmor Homes	1607 Bruce Ct 7	30
72	Gilmor Homes	1607 Bruce Ct 8	30
73	Gilmor Homes	1609 Bruce Ct 1	30
74	Gilmor Homes	1609 Bruce Ct 2	30
75	Gilmor Homes	1609 Bruce Ct 3	30
76	Gilmor Homes	1609 Bruce Ct 4	30

**Appendix Q
List of Gilmor Homes Units Proposed for Demolition**

Unit Count	Development	Address	Building #
77	Gilmor Homes	1609 Bruce Ct 5	30
78	Gilmor Homes	1609 Bruce Ct 6	30
79	Gilmor Homes	1609 Bruce Ct 7	30
80	Gilmor Homes	1609 Bruce Ct 8	30
81	Gilmor Homes	1611 Bruce Ct 1	30
82	Gilmor Homes	1611 Bruce Ct 2	30
83	Gilmor Homes	1611 Bruce Ct 3	30
84	Gilmor Homes	1611 Bruce Ct 4	30
85	Gilmor Homes	1611 Bruce Ct 5	30
86	Gilmor Homes	1611 Bruce Ct 6	30
87	Gilmor Homes	1611 Bruce Ct 7	30
88	Gilmor Homes	1611 Bruce Ct 8	30
89	Gilmor Homes	1600 Vincent Ct 1	35
90	Gilmor Homes	1600 Vincent Ct 2	35
91	Gilmor Homes	1600 Vincent Ct 3	35
92	Gilmor Homes	1600 Vincent Ct 4	35
93	Gilmor Homes	1600 Vincent Ct 5	35
94	Gilmor Homes	1600 Vincent Ct 6	35
95	Gilmor Homes	1602 Vincent Ct 1	35
96	Gilmor Homes	1602 Vincent Ct 2	35
97	Gilmor Homes	1602 Vincent Ct 3	35
98	Gilmor Homes	1602 Vincent Ct 4	35
99	Gilmor Homes	1602 Vincent Ct 5	35
100	Gilmor Homes	1602 Vincent Ct 6	35
101	Gilmor Homes	1602 Vincent Ct 7	35
102	Gilmor Homes	1602 Vincent Ct 8	35
103	Gilmor Homes	1604 Vincent Ct 1	35
104	Gilmor Homes	1604 Vincent Ct 2	35
105	Gilmor Homes	1604 Vincent Ct 3	35
106	Gilmor Homes	1604 Vincent Ct 4	35
107	Gilmor Homes	1604 Vincent Ct 5	35
108	Gilmor Homes	1604 Vincent Ct 6	35
109	Gilmor Homes	1606 Vincent Ct 1	36
110	Gilmor Homes	1606 Vincent Ct 2	36
111	Gilmor Homes	1606 Vincent Ct 3	36
112	Gilmor Homes	1606 Vincent Ct 4	36
113	Gilmor Homes	1606 Vincent Ct 5	36
114	Gilmor Homes	1606 Vincent Ct 6	36

Appendix Q
List of Gilmor Homes Units Proposed for Demolition

Unit Count	Development	Address	Building #
115	Gilmor Homes	1606 Vincent Ct 7	36
116	Gilmor Homes	1606 Vincent Ct 8	36
117	Gilmor Homes	1608 Vincent Ct 1	36
118	Gilmor Homes	1608 Vincent Ct 2	36
119	Gilmor Homes	1608 Vincent Ct 3	36
120	Gilmor Homes	1608 Vincent Ct 4	36
121	Gilmor Homes	1608 Vincent Ct 5	36
122	Gilmor Homes	1608 Vincent Ct 6	36
123	Gilmor Homes	1608 Vincent Ct 7	36
124	Gilmor Homes	1608 Vincent Ct 8	36
125	Gilmor Homes	1610 Vincent Ct 1	36
126	Gilmor Homes	1610 Vincent Ct 2	36
127	Gilmor Homes	1610 Vincent Ct 3	36
128	Gilmor Homes	1610 Vincent Ct 4	36
129	Gilmor Homes	1610 Vincent Ct 5	36
130	Gilmor Homes	1610 Vincent Ct 6	36
131	Gilmor Homes	1610 Vincent Ct 7	36
132	Gilmor Homes	1612 Vincent Ct	36

Appendix R:
Long-Term Affordable Criteria

HOUSING AUTHORITY OF BALTIMORE CITY

**LONG TERM AFFORDABLE CRITERIA
APPLICABLE TO UNITS AT THE SITES
UNDER THE RENTAL ASSISTANCE DEMONSTRATION**

This document known as the “Long Term Affordable Criteria Applicable to Units at the Sites under the Rental Assistance Demonstration” or LTA Criteria sets forth the requirements for applicants for, and residents in, units under a Housing Assistance Payment Contract for project based rental assistance (“**PBRA Units**”) at the housing development under the Rental Assistance Demonstration (the “**RAD Site**” or “**RAD Sites**”). The Owner and Management Agent shall not change any of the requirements set forth in this document without written approval from the Housing Authority of Baltimore City (“**HABC**”).

The PBRA Units will also be operated in accordance with all standing and subsequent guidance from the U.S. Department of Housing and Urban Development, Office of Housing (“**HUD**”), with the exception of provisions explicitly described in PIH Notice 2012-32 Rev-2 or as explicitly permitted by a HUD waiver.

1. DEFINITIONS

- (a) **Applicant** – shall mean a household (including the head of household and all other family members) on HABC’s waiting list for public housing.
- (b) **“Family”** is defined as including, but is not limited to, the following, regardless of actual or perceived sexual orientation, gender identity, or marital status:
- (1) A single person, who may be an elderly person, displaced person, disabled person, near-elderly person, or any other single person; or
 - (2) A group of persons residing together, and such group includes, but is not limited to:
 - (i) A family with or without children (a child who is temporarily away from the home because of placement in foster care is considered a member of the family);
 - (ii) An elderly family;
 - (iii) A near-elderly family;
 - (iv) A disabled family;
 - (v) A displaced family; and
 - (vi) The remaining member of a tenant family.
- (c) **“Long Term Affordable units”** or “**LTA units**” shall mean those PBRA Units that are leased to residents and Applicants referred from HABC’s public housing and/or transfer waiting lists. The Applicants for, and residents in, these PBRA Units have the rights, privileges and benefits comparable to HABC’s public housing residents or applicants as set forth in this LTA Criteria, and residents in the PBRA Units shall pay no more than 30% of their monthly adjusted income in rent. Notwithstanding the above, no minimum

income is required. UFAS units must be operated and maintained in accordance with the terms stated herein.

- (d) **“Management Agent”** means the company engaged to manage and operate the development on behalf of the Owner.
- (e) **“Non-elderly person with disabilities”** or **“NED”** as defined in the Bailey Consent Decree entered in Bailey v. Housing Authority of Baltimore City, JFM 02-CV-225; JFM-04-CV-03107, shall mean a family whose sole member, head of household, or head of household's spouse is a person with a disability who is under age sixty-two (62), and which is eligible for a one-bedroom public housing unit because a second bedroom is needed for disability-related reasons; and who is on HABC's waiting list. The definition of NED does not limit the outcome of the reasonable accommodations interactive process.
- (f) **“Owner”** refers to the entity which owns the RAD Site and which is responsible for ensuring the Management Agent complies with the admissions and leasing requirements for the LTA units.
- (g) **“Resident”** shall mean a household who leases an LTA unit under these criteria.
- (h) **“UFAS Unit”** shall mean the same as an Accessible Dwelling Unit as defined in the Uniform Federal Accessibility Standards (“UFAS”), and for purposes of this LTA Criteria shall be a unit certified by an architect approved by HABC as compliant with UFAS. Generally, a “UFAS Unit” or “UFAS Accessible Unit” is a unit that accommodates a person with mobility impairments. The HUD regulations at 24 CFR 8.22 (which apply in the case of the RAD conversion and planned rehabilitation work) sets forth a standard that a minimum of five percent (5%) of the total dwelling units be accessible for persons with mobility impairments. The same rule provides a cross-reference to 24 CFR 8.32 (application of UFAS). The term “Accessible Dwelling Unit” is defined in UFAS.
- (i) **“Violent Criminal Activity”** means any criminal activity that has as one of its elements the use, attempted use, or threatened use of physical force substantial enough to cause, or be reasonably likely to cause, serious bodily injury or property damage. 24 C.F.R. §5.100.

2. DELETED.

3. SECURITY DEPOSIT; APPLICATION OR OTHER FEES

The amount of the security deposit will be equal to one month's rent, or Fifty Dollars (\$50.00), whichever is lower. The Agent will establish a payment plan for payment of the security deposit in the event of a documented hardship situation.

Applicants will not be charged an application fee. Additionally, Applicants will not be charged any fee for credit or criminal background checks.

4. SCREENING CRITERIA

(a) An Applicant may be screened for credit and criminal background according to the detailed screening process set forth in Section 4.1 below. Lack of credit history will not be sufficient justification for rejection of an Applicant.

(b) The Owner and Management Agent shall not establish any site based waiting list for the PBRA RAD Site. The Owner and Management Agent must lease the PBRA Units to eligible Applicants referred from HABC's public housing waiting lists.

(c) The Owner and Management Agent shall not re-screen current public housing tenants or tenants from other RAD Sites who: (i) are in good standing, (ii) meet the income-eligibility requirements for the RAD PBRA Unit, and (iii) are approved for a reasonable accommodation or immediate needs transfer to a RAD Site.

4.1. DETAILED SCREENING PROCESS

- (a) Credit and criminal background reports may be evaluated through a third-party screening company using the criteria set forth in 4.1.1. and 4.1.2 below.
- (b) Rental history may be verified up to the past three years.
- (c) Applicants may be rejected for any of the following reasons: Agent or other acceptable references indicates a history of lease violations, including but not limited to repeated judgments for failure to pay rent, chronic late rental payments (more than four (4) late rental payments within a twelve (12) month period), prior eviction(s), history of public disturbances, damage to living unit or property of others, physical and/or verbal attacks on others, history of poor or unsatisfactory housekeeping or any other behavior that would have a substantial adverse impact upon the health, safety or peaceful enjoyment of other Residents, members of the community or Management Agent personnel at the RAD Site.

4.1.1. Credit Screening Criteria

(a) Credit Information.

The criteria for determining an Applicant's eligibility based on credit screening are set forth hereunder. Applicants may be denied eligibility if they have a history of not meeting past financial obligations as demonstrated by the following:

- More than four (4) late rental payments within a twelve (12) month period only if the Applicant leased a dwelling unit that received continuous direct rental assistance subsidy that provided for the Applicant to pay no more than thirty percent (30%) of his or her income during the Applicant's tenancy.

- Unsatisfied collections, charge-offs, or judgments in the past 24 months totaling more than \$3,000 in the aggregate.

Notwithstanding evidence of difficulty meeting past financial obligations, Applicants will be favorably considered if their poor payment history relates to:

- Medical debts
- Student loans

Applicants will not be denied eligibility solely on the basis of bankruptcy.

Other credit issues such as unsatisfied collections, charge-offs, judgments or liens will be reviewed in light of all the circumstances including evidence of the Applicant's limited disability benefits, prior lack of subsidized housing, illness or loss of Spouse, loss of primary support, etc. Such review may result in a favorable consideration for Applicant despite such credit issues. The housing application shall inform applicants that they have the opportunity to provide information about or to explain the circumstances for their poor credit history.

(b) Pre-Denial Review

The Owner shall provide Applicants the opportunity to discuss reasons for a poor credit history, mitigating circumstances or requests for reasonable accommodations prior to the Owner making a determination to deny the Applicant on the basis of credit. Said pre-denial review will not replace or eliminate the informal hearing process set forth in 10.1 below. Examples of extenuating circumstances that should result in a favorable review by the Owner/Agent include (but are not limited to):

- Applicants whose form of income is from Supplemental Security Income (SSI) or similar form of disability payment.
- Applicants whose previous housing payment was substantially disproportionate to the tenant portion of rent for which he or she will be responsible in the LTA Unit.
- Applicants with a documented/disclosed hardship that is not likely to repeat.

4.1.2. Criminal Screening

(a) General.

1. Denial of Eligibility. An Applicant will be denied eligibility for admission for any of the following reasons:
 - Any household member who has been convicted of drug-related criminal activity in connection with the manufacture or production of methamphetamine. This results in a lifetime ban from assisted housing.

- Any household member who is subject to a lifetime registration requirement under a State sex offender registration program.
- Any household member who has been evicted for drug-related criminal activity within the prior three (3) years.

2. An Applicant may be denied eligibility for admission based upon the following:

- Public records, landlord references or criminal background checks indicate there is reasonable cause to believe that the Applicant and/or other household members have a history of violent criminal activity, violent behavior or alcohol or drug abuse that would threaten the health, safety, or right to peaceful enjoyment of the premises by other tenants.
- Public records or criminal background checks indicate Applicant/or household member has been convicted of a drug-related offense, Violent Criminal Activity, or felony offense.

"Alcohol or drug abuse" means, including but not limited to:

- Evidence of a history or pattern of illegal substance abuse that the individual has, within the past three years, engaged in to justify a reasonable belief that the individual's behavior is current.
- "Violent criminal activity" means, including but not limited to:
- Evidence that the individual has, within the past three years, engaged in the behavior recently enough to justify a reasonable belief that the individual's behavior is current.
- Any history or evidence of repeated acts of violence on the part of an individual, or a pattern of conduct constituting a danger to peaceful occupancy by neighbors;
- Any history of initiating threats or behaving in a manner indicating an intent to assault employees or other tenants.

3. Pending charges for any crime (not just those listed below) may be considered a cause for temporary denial of eligibility for admission. If the Applicant is temporarily denied admission because of the existence of a pending charge, the Applicant will maintain a priority order for occupancy of a PBRA Unit until disposition of the pending charge either (i) favorably, in which case the application process can continue, or (ii) unfavorably in which case the Applicant will be denied based on the criminal background screening criteria set forth herein.

(b) **Specific Felony Crimes**

The following felonies may subject new Applicants to a maximum seven (7) year exclusion period. The exclusion period is calculated from the date of conviction or release from incarceration, whichever is later. If Management Agent chooses to

utilize the maximum seven (7) year exclusion period to deny a new Applicant, the Applicant shall be notified that he or she may contact the tenant council at the RAD Site for assistance with appealing the Owner's decision in applying the seven (7) year exclusion period.

1. Felony Child Abuse
2. Sexual Abuse of a Minor except when crime results in conviction as a sex offender subject to a lifetime registration requirement, who, in such case, is prohibited from federally assisted housing.
3. Felony Arson
4. Malicious Burning of Personal Property (First degree)
5. Burning with Intent to Defraud
6. Felony Assault Attempted Poisoning
7. Manufacture, Distribution or Possession with the Intent to Distribute of CDS (Controlled Dangerous Substances)
8. Damage to Associated Building when Charged as a Felony
9. Murder (all forms)
10. Attempted Murder (all forms)
11. Voluntary Manslaughter (all forms)
12. Homicide (all forms)
13. Kidnapping
14. Child Kidnapping
15. Abduction of Child Under 16
16. Robbery
17. Robbery with a Dangerous Weapon
18. Carjacking
19. Felony Sexual Crimes, except when crime results in conviction as a sex offender subject to a lifetime registration requirement, who, in such case, is prohibited from federally assisted housing.
20. Weapons Crimes - Felonies
21. Use of a Machine Gun in a Crime of Violence
22. Use of a Machine Gun for Aggressive Purposes
23. Manufacture or Possession of a Destructive Device

(c) **Other Felony Crimes**

An Applicant may be denied eligibility for admission due to convictions for other types of felony crimes for a maximum of three (3) years beginning on the date of conviction or the release from incarceration, whichever date is later.

(d) **Misdemeanor Crimes**

An Applicant may be denied eligibility for admission due to convictions for misdemeanor crimes for a maximum of eighteen (18) months beginning on the date of conviction or the release from incarceration, whichever date is later.

(e) **Confidentiality of Criminal Records**

Any criminal record received must be maintained confidentially, not misused or improperly disseminated.

(f) **Disclosure of Criminal Records to Family**

Before taking any adverse action based on a criminal conviction record, the Applicant and the subject of the record will be provided with a copy of the criminal record and an opportunity to dispute the record at an informal hearing.

4.1.3. Other Reasons to Deny Eligibility

Apart from the credit and criminal background screening criteria above, Applicants may be denied eligibility for the other following reasons:

- Applicant’s household income must meet the Low Income Housing Tax Credit requirements for eligibility.
- Applicant fails to respond to a request for verification of information or for additional information within ten (10) working days of the written request from the Owner.
- Applicant makes any material false statement or omission on the application and/or during an application interview with the intention of misleading the Owner.
- Applicant’s household size is incompatible with the Owner’s occupancy standards and/or unit availability. Provided, however, that an Applicant who has a verifiable need for a live-in aide may not be denied admission on the grounds that the addition of a live-in aide violates the Owner’s occupancy standards. A live-in aide is defined in the public housing regulations (24 CFR 966.4 (d)(3)(ii)), as may be amended, as “a person who resides with an elderly, disabled or handicapped person and who:
 - (A) Is determined to be essential to the care and well-being of the person;
 - (B) Is not obligated for the support of the person; and
 - (C) Would not be living in the unit except to provide the necessary supportive services.”

The live-in-aide is subject to the same screening criteria as an Applicant.

4.1.4. Prohibited Criteria for Denial of Eligibility

An Applicant cannot be rejected because he or she:

- Has no income;
- Is not employed;
- Does not participate in a job-training program;
- Will not apply for various welfare or benefit programs;
- Has children;
- Is receiving welfare benefits;
- Has children born out of wedlock;
- Is a student, unless otherwise prohibited by financing for the Development.

4.2. Mitigating Circumstances- Generally

Mitigating circumstances are facts relating to the applicant's record of unsuitable rental history or behavior, which, when verified would indicate both: (1) the reason for the unsuitable rental history and/or behavior; and (2) that the reason for the unsuitable rental history and behavior is no longer in effect or is under control, and the applicant's prospect for lease compliance is an acceptable one, justifying admission.

If unfavorable information is received about an applicant, consideration shall be given to the time, nature, and extent of the applicant's conduct and to factors that might indicate a reasonable probability of favorable future conduct. In order to be factored into the screening assessment of the applicant, mitigating circumstances must be verifiable.

If the mitigating circumstances claimed by the Applicant relate to a disability, medical condition or course of treatment, the Owner may require documentation of the manifestation of a disability only to evaluate the mitigating circumstances that pertain to the request for a specific accommodation. The Owner may not require Applicants or Residents to provide access to confidential medical records in order to verify a disability or to disclose the identity of the disability or specific details about the disability.

4.2.1. Mitigating Circumstances

Examples of mitigating circumstances include:

- Evidence of successful rehabilitation;
- Evidence of the Applicant family's participation in and completion of social service or other appropriate counseling service ;
- Evidence of successful and sustained modification of previous disqualifying behavior.

Consideration of mitigating circumstances does not guarantee that the Applicant will qualify for admission. Such circumstances will be considered in light of:

- The applicant's ability to substantiate through verification the claim of mitigating circumstances and his/her prospects for improved future behavior; and

- The applicant's overall performance with respect to all the screening requirements.
- However if mitigating circumstances are found the applicant will keep his place on the waiting list and will be housed in the unit which was offered if that unit is still available and if it is not will be housed when the next appropriately sized unit becomes available.

4.3. Citizenship/Eligible Immigrant Status

For determining eligibility for admission to receive housing assistance, a family member must be a U.S. citizen or an eligible immigrant. Eligible immigrants are persons who are in one of the categories established by HUD. Assistance to the family may not be delayed, denied or terminated on the basis of immigration status at any time prior to receipt of the decision from an appeal to the Immigration and Naturalization Service.

5. OCCUPANCY GUIDELINES

5.1. General. These occupancy guidelines will be followed by the Owner to ensure that families occupy units of the appropriate size. This policy maintains the maximum usefulness of the units, while preserving them from excessive wear and tear or under-utilization.

5.2. Determining Unit Size.

(a) The Owner does not determine who shares a bedroom/sleeping room, but there must be at least one person per bedroom. Standards for determining unit size shall be applied in a manner consistent with Fair Housing guidelines.

(b) For occupancy standards, an adult is a person who is at least 18 years of age or older, an emancipated minor, or in a legally recognized marriage as under the laws of the State of Maryland or a marriage recognized by the State of Maryland. All guidelines in this section relate to the number of bedrooms in the unit.

(c) Owner will assign a unit within the following guidelines:

- (i) Separate bedrooms should be allocated for persons of the opposite sex other than adults who are considered a couple as approved members of the household, and children under five years old).
- (ii) Live-in aides will generally be provided a separate bedroom for their occupancy only, except that the Resident may consent to reside with a Live-in aide in a smaller size unit if a unit with a separate bedroom is not available, and the assignment of the smaller size unit meets the requirements in the HUD Multifamily Occupancy Handbook, 4350.3 REV-1, as may be amended. The Owner is not obligated to nor will it house the family members of a live-in aide.

- (iii) Space may be provided for a child who is away at school but who lives with the family during school recesses.
- (iv) Space will not be provided for a family member who will be absent most of the time except for family members who have been called to active duty. In the case of a family member in active duty, the family composition will include the member who is away from the unit for such purpose, even if the active duty family member is absent from the unit for more than six months. After one (1) year the Owner may reevaluate the situation and take appropriate action.
- (v) Single person families shall be allocated a zero or one bedroom unit. The living room should not be used as a bedroom except for purposes of a reasonable accommodation.

Bedroom Size	Persons in Household: (Minimum #)	Persons in Household: (Maximum #)
0 Bedroom	1	1
1 Bedroom	1	2
2 Bedrooms	2	4
3 Bedrooms	3	6
4 Bedrooms	4	8

5.3. Exceptions To Occupancy Standards.

The Owner or HABC, as applicable, will grant an exception to the occupancy standards upon request if the exception is necessary as a reasonable accommodation for persons with disabilities. A reasonable accommodation for a larger unit may be granted - for example, when a person with a disability needs space for medical equipment or a live-in aide. (See verification provisions in Section 14.) If a person's disability is obvious, or otherwise known to the Owner or HABC, and if the need for the requested accommodation is also readily apparent or known, then the Owner or HABC may not request any additional information. The Owner or HABC may only request additional information about either the person's disability or disability-related need for the accommodation if either is not known or readily apparent.

- HABC will not assign a larger bedroom size due to additions of family members other than by birth, adoption, marriage, or court-awarded custody.

An exception will be granted if the family has submitted an "Appointment of Temporary Guardian" to the Owner. If this form has been submitted, the Owner

will also require that the family have initiated legal proceedings for guardianship or legal custody.

- All members of the family residing in the unit must be approved by the Owner. The family must obtain approval of any additional family member before the person occupies the unit except for additions by birth, adoption, or court-awarded custody, in which case the family must inform the Owner within 30 days.
- To avoid vacancies, the Owner may provide a family with a larger unit than the occupancy standards permit subject to the approval of the HABC. The family must agree to move to a suitable, smaller unit when another family qualifies for the larger unit and there is a suitable smaller unit available. This requirement shall be included in the lease.

5.4. UFAS Accessible Units and Other Units with Accessible Features. UFAS Accessible Units, i.e., those designed and constructed to meet the needs of persons with mobility disabilities, and units with other types of accessible features will be first offered to households with a family member who needs the accessible features of the unit. Such units will be offered to households who do not need the accessible features of the unit only after the Owner has determined that no Resident or Applicant has a need for a unit with such accessible features and on the understanding that such Residents or Applicants must accept a transfer to a non-accessible unit at a later date if the situation arises in which a Resident or Applicant determined to be otherwise eligible for the housing has a need for the accessible features.

6. AMOUNT OF RENT

Owner will conduct initial income verifications, annual re-certifications of income and interim certifications, as well as income verifications upon turnover.

6.1. Total Tenant Payment

The Total Tenant Payment is the greater of:

- 30% of the adjusted monthly income
- 10% of the monthly income
- The minimum rent as established by the HABC.

The Total Tenant Payment does not include charges for excess utility consumption or other charges.

If a minimum rent is established the resident will be required to pay at least the amount established as the minimum rent, unless Management Agent grants an exemption from the due to financial hardship.

6.2 Rent Determination.

The amount of rent and family size or composition will be set forth in the lease or, if there are changes, in a lease supplement, which will be delivered to the resident. The amount of monthly rent and the family composition will remain in effect for the period between annual re-certifications, unless during such period:

- (a) Resident can show a change in Resident's circumstances that would justify a reduction in rent by submitting a signed statement and other documentation, setting forth the facts as to the family composition, employment and family income. Such circumstances include, but are not limited to, the following: (1) Divorce; (2) Marriage; (3) Separation; (4) Death; (5) Retirement; (6) Unemployment; (7) Strike; (8) Layoff; (9) Sick Leave; (10) Disability; (11) Entry into or discharge from military service; (12) Birth; and (13) Change of job or other reduced income.
- (b) Resident can show a decrease in income which is believed to be temporary in nature.
- (c) Resident can show that the income on the basis of which the rent was calculated has terminated. Resident shall report this information to the Owner together with any information concerning other sources of income which have become available to family members since the last rent determination. The rent will then be re-determined based on the information which is provided, but in no case will the rent be increased, beyond the original rent, until the next Annual Review.

6.2.2 Reporting a Change in Income Resident shall report any change in income described in Paragraphs (a), (b), and (c) above within thirty (30) days of its occurrence. Any decrease in rent resulting from the change will take effect on the first of the month following the month in which the change occurred.

6.3. Minimum Income.

A resident is not required to have any minimum income.

6.4. Determining and Calculating Income

6.4.1. Generally the final calculation for each income or deduction source will be rounded to the nearest dollar, unless documentation from the income source provides otherwise.

6.4.2.

- (a) "Income" is defined as the anticipated total income from all sources for purposes of calculating the TTP. This includes net income derived from assets, received by the family head and spouse (even if temporarily absent) and by each additional family member for the 12 month period following the effective date of initial determination or reexamination of income. It

does not include income that is temporary, non-recurring, or income that is specifically excluded by other federal statute.

- (b) “Annual income” is the amount of income prior to any allowable expenses or deductions, and does not include income that has been excluded by other provisions in this policy. Annual income is used to determine whether or not an Applicant is within the applicable income limits. “Adjusted Income” is defined as the Annual Income minus any allowable deductions.

6.4.3. Mandatory Deductions.

The HUD mandatory deductions from Annual Income must be applied when calculating income for program eligibility and determination of rent. The mandatory deductions are as follows:

- (a) Dependent allowance: \$480 each for family members (other than the head or spouse), who are minors, and for family members who are 18 and older who are full-time students or who are disabled.
- (b) "Elderly" allowance: \$400 per household for families whose head or spouse is 62 or over or disabled.
- (c) Allowable medical expenses for all family members are deducted for elderly and disabled families. Medical deductions will only be allowed to the extent that the sum exceeds three percent of the annual income.
- (d) Childcare expenses for children under 13 are deducted when child care is necessary to allow an adult family member to work, actively seek work, or attend school (including vocational training).
- (e) Expenses for attendant care or auxiliary apparatus for persons with disabilities if needed to enable the individual or an adult family member to work.

6.4.4. Training Income Exclusions.

Income from certain training programs will be excluded from calculating income for program eligibility and determining the amount of rent. A training program is defined as one with goals and objectives designed to lead to a higher level of proficiency, and one, which enhances the individual’s ability to obtain employment. The training program may have performance standards to measure proficiency. Training may include, but is not limited to: (a) classroom training in a specific occupational skill; (b) on-the-job training with wages subsidized by the program; or (c) basic education.

The exclusions are as follows:

- (a) Exclusion of amounts received under training programs funded by HUD;
- (b) Amounts received by a participant in other publicly assisted programs which are specifically for or in reimbursement of out-of-pocket expenses incurred (special equipment, clothing, transportation, child care, etc.) and which are made solely to allow participation in a specific program. Exclusion of amounts received from participation in qualifying State or local employment training programs (including training programs not affiliated with a local government) and training of a family member as resident management staff. Amounts excluded by this provision must be received under employment training programs with clearly defined goals and objectives, and are excluded only for the period during which the family member participates in the employment-training program.

6.4.4.1. For this purpose Annual Income does not include incremental earnings and benefits resulting to any family member from participation in qualifying State or local employment training programs.

6.4.4.2. All other amounts (such as child support and alimony) are treated in the usual manner in determining annual income. Child support, or other income that is not earnings or benefits, is not a factor and will not be considered in regard to training income exclusions, regardless of whether they have increased or decreased.

6.4.4.3. Any member of the Resident's family is eligible for the exclusion, provided the individual is enrolled in the qualifying employment-training program. If a family has members who enroll in training programs at different times, the exclusion may be taken at different periods. The rules will be applied individually to each member based on which type of program they are enrolled in.

6.4.4.4. Upon verification, Residents who are actively enrolled in a qualifying training program will have the incremental income from the training program excluded from their annual income.

6.4.4.5. A Resident who has substantially completed a training program in order to accept a job offer will be eligible for the 18-month exclusion of income. "Substantial completion" of a training program will be completion of 75% of the program. If a resident has completed that portion of the training program necessary to get a job and continues simultaneously with the training program, the 18-month exclusion period will begin on the date the resident started the new job, not the date they complete the training program. The resident is not required to get a job that is directly related to the training program to be eligible for the exclusion.

6.4.4.6. For self-employed Residents, only the net income of the resident will be excluded when factoring the earnings.

6.4.4.7. The Resident is required to notify the Owner within 10 working days of enrolling in a qualifying training program.

6.4.4.8. Residents who have a decrease in income as a result of enrolling in a training program may request an interim examination. In the event the interim examination results in a decrease in incremental income as a result of the training program, the resident's rent will be adjusted accordingly.

6.4.4.9. All training income from a HUD sponsored or funded training program, whether incremental or not, is excluded from the resident's annual income while the resident is in training. Income from a Resident Services training program, which is funded by HUD, is excluded.

6.4.5. Averaging Income. When Annual Income cannot be anticipated for a full twelve months, the Owner will annualize current income and conduct an interim reexamination if income changes. If there are bonuses or overtime, which the employer cannot anticipate for the next twelve months, bonuses and overtime received the previous year will be used. Income from the previous year may be analyzed to determine the amount to anticipate when third-party or check-stub verification is not available. If by averaging, an estimate can be made for those families whose income fluctuates from month to month, this estimate will be used so that the housing payment will not change from month to month. The method used depends on the regularity, source and type of income.

6.4.6. Income Of Person Permanently Confined To or Released from Nursing Home. This household income will be handled in accordance with the HUD Multifamily Occupancy Handbook, 4350.3 REV-1, as may be amended.

6.4.7. Income Of New Family Members Added to the Lease. The Owner will process an increase in rent between regularly scheduled re-certifications when the household size increases due to the addition of an adult household member approved by the Owner. Requests for the addition of a new member of the household must be approved by the Owner, prior to the actual move-in by the proposed new member.

6.4.8. Regular Contributions And Gifts. Regular contributions and gifts received from persons outside the household are counted as income for calculation of the Total Tenant Payment. Any contribution or gift received every 2 months or more frequently will be considered a "regular" contribution or gift, unless the amount is less than \$600.00 per year. This includes rent and utility payments made on behalf of the family and other cash or non-cash contributions provided on a regular basis. It does not include casual contributions or sporadic gifts. If the family's expenses exceed their known income, the Owner will make inquiry of the family about contributions and gifts.

6.4.9. Alimony And Child Support Regular alimony and child support payments are counted as income for calculation of Total Tenant Payment. If the amount of child support or alimony received is less than the amount awarded by the court, the HABC

must use the amount awarded by the court unless the family can verify that they are not receiving the full amount. The Owner will accept as verification that the family is receiving an amount less than the award if the Owner receives verification from the agency responsible for enforcement or collection. It is the family's responsibility to supply a certified copy of the divorce decree.

6.4.10. Lump-Sum Receipts. Lump-sum additions to family assets, such as inheritances, insurance payments (including payments under health and accident insurance and worker's compensation), capital gains, and settlement for personal or property losses, are not included in income but may be included in assets. Lump-sum payments caused by delays in processing periodic payments (unemployment or welfare assistance) are counted as income. Lump sum payments from Social Security or SSI are excluded from income, but any amount remaining will be considered an asset. Deferred periodic payments, which have accumulated due to a dispute, will be treated the same as periodic payments which are deferred due to delays in processing. In order to determine amount of retroactive tenant rent that the family owes as a result of the lump sum receipt the Owner will always calculate retroactively to date of receipt the lump-sum payment was received, or to the date of admission, whichever is closer. The family's attorney fees may be deducted from lump-sum payments when computing annual income if the attorney's efforts have recovered a lump-sum compensation, and the recovery paid to the family does not include an additional amount in full satisfaction of the attorney fees.

6.4.11. Retroactive Payments. In the event the calculation of income results in the family owing a retroactive payment, the family should make the payment in a lump sum. The Management Agent, at its option, may enter into a Repayment Agreement with the family. The amount owed by the family is a collectible debt even if the family becomes unassisted.

6.4.12. Contributions To Retirement Funds – Assets. Contributions to company retirement/pension funds are handled in accordance with the HUD Multifamily Occupancy Handbook, 4350.3 REV-1, as may be amended.

6.4.13. Assets Disposed Of For Less Than Fair Market Value. The Owner must count assets disposed of for less than fair market value during the two years preceding certification or reexamination. The Owner will count the difference between the market value and the actual payment received in calculating total assets. The difference will be included in calculating total assets for two years. Assets disposed of as a result of foreclosure or bankruptcy are not considered to be assets disposed of for less than fair market value. Assets disposed of as a result of a divorce or separation are not considered to be assets disposed of for less than fair market value.

If the total value of assets disposed of within the two-year period is less than \$1,000.00, they will not be considered an asset.

6.4.14. Child Care Expenses. Un-reimbursed childcare expenses for children under 13 may be deducted from annual income if they enable an adult to work, actively seek work, attend school full time, or attend full-time vocational training. In the case of a child

attending private school, only before or after-hours care can be counted as childcare expenses. If a tenant is eligible for the earned income disallowance, the amount of deduction for childcare expenses necessary to permit employment shall not exceed the amount of employment income that is included in annual income. Therefore, the disregarded or excluded amounts cannot be used in determining the cap for the childcare expense deduction. Childcare expenses must be reasonable. Reasonable is determined by what the average child care rates are in the Development's jurisdiction. Allowing deductions for childcare expenses is based on the following guidelines:

- (a) Childcare to work: The maximum childcare expense allowed must be less than the amount earned by the person enabled to work. The "person enabled to work" will be the adult member of the household who earns the least amount of income from working.
- (b) Amount of Expense: The Owner will survey the local care providers in the community to determine what is reasonable. The Owner will use the collected data as a guideline. If the hourly rate materially exceeds the guideline, the Owner may calculate the allowance using the guideline.

6.4.15. Medical Expenses When it is unclear in the HUD rules as to whether or not to allow an item as a medical expense, IRS Publication 502 will be used as a guide. Nonprescription medicines, unless prescribed by a licensed medical professional, will not be considered a medical expense. Chiropractic services will be considered allowable medical expenses.

6.4.16. Proration Of Assistance For "Mixed" Families. Proration of assistance must be offered to any "mixed" applicant or participant family. A "mixed" family is one that includes at least one U.S. citizen or eligible immigrant and any number of ineligible members. Applicant mixed families are entitled to prorated assistance. Families that become mixed after June 19, 1995, by addition of an ineligible member are entitled to prorated assistance.

6.4.17. Prorated TTP Calculation for Mixed Families. Prorated assistance will be calculated by subtracting the Total Tenant Payment from the applicable Maximum Rent for the unit the family occupies to determine the Family Maximum Subsidy. The family's TTP will be calculated by:

- (a) dividing the family maximum subsidy by the number of persons in the family to determine member maximum subsidy.
- (b) multiplying the member maximum subsidy by the number of eligible family members to determine eligible subsidy.
- (c) subtracting the amount of eligible subsidy from the applicable maximum rent for the unit the family occupies to get the family's revised total tenant payment.

6.4.18. Income Changes Resulting From Welfare Program Requirements. Owner will not reduce rent for families whose welfare assistance is reduced specifically because of:

- (a) fraud; or
- (b) failure to participate in an economic self-sufficiency program; or
- (c) noncompliance with a work activities requirement.

However, Owner will reduce the rent if the welfare assistance reduction is a result of:

- (x) the expiration of a lifetime time limit on receiving benefits; or
- (y) a situation where a family member has complied with the welfare agency's economic self-sufficiency or work activities requirements but cannot or has not obtained employment; or
- (z) a situation where a family member has not complied with other welfare agency requirements.

6.4.18.1. Imputed welfare income is the amount of annual income not actually received by a family as a result of a specified welfare benefit reduction that is included in the family's income for rental contribution. Imputed welfare income is not included in annual income if the family was not an assisted resident at the time of sanction. The amount of imputed welfare income is offset by the amount of additional income a family receives that begins after the sanction was imposed. When additional income is at least equal to the imputed welfare income, the imputed welfare income is reduced to zero.

6.4.18.2. Owner will obtain from the welfare agency written verification that the family's benefits have been reduced for fraud or noncompliance before denying the family's request for rent reduction.

6.4.19. Utilities. No applicant can be admitted nor tenant transferred to a development with resident-paid utilities unless he or she can obtain utility service. The Resident is responsible for establishing an account directly with the utility provider and paying for those individually metered utilities. The Resident's rent must be reduced by the amount of the established utility allowance. If the Resident's actual utility bill(s) exceeds the utility allowance, Resident must pay the full amount of the bill to the utility supplier. If Resident pays a flat rent, Resident is not entitled to a utility reimbursement. Failure of Resident to retain and maintain utility service is grounds for termination under the Lease.

6.5. **Verification of Income.**

Owner shall verify income and other information pertaining to the Resident's household in accordance with the methods set forth in this Section 6.5. A third party source should first be used to verify employment, unemployment and social security benefits.

6.5.1. Employment Income. Verification forms should be used to request that the employer specify the:

- (a) Dates of employment
- (b) Amount and frequency of pay
- (c) Date of the last pay increase
- (d) Likelihood of change of employment status and effective date of any known salary increase during the next 12 months
- (e) Estimated income from overtime, tips, bonus pay expected during next 12 months

6.5.1.1. Acceptable forms of verification include:

- (a) EIV information obtained from
- (b) Employment verification form completed by the employer.
- (c) Check stubs or earning statements that indicate the employee's gross pay, frequency of pay or year to date earnings.
- (d) W-2 forms plus income tax return forms.
- (e) Self-certification or income tax returns signed by the family may be used for verifying self-employment income, or income from tips and other gratuities.
- (f) State Wage Information Collection Agency (SWICA) means the State agency, receiving quarterly wage reports from employers in the State, or an alternative system that has been determined by the Secretary of Labor to be as effective and timely in providing employment-related income and eligibility information
- (g) In cases where there are questions about the validity of information provided by the family, the Management Agent will require the most recent federal income tax statements.

6.5.2. Social Security, Pensions, Supplemental Security Income (SSI), Disability Income.

Acceptable methods of verification include:

- (a) Benefit verification form completed by agency providing the benefits
- (b) Computer report electronically obtained or in hard copy.
- (c) Award or benefit notification letters prepared and signed by the providing agency.

6.5.3. Unemployment Compensation.

Acceptable methods of verification include:

- (a) Computer report electronically obtained or in hard copy, stating payment dates and amounts
- (b) Verification form completed by the unemployment compensation agency.
- (c) Payment Stubs

6.5.4. Welfare Payments or General Assistance.

Acceptable methods of verification include:

- (a) Verification form completed by payment provider.
- (b) Written statement from payment provider indicating the amount of grant/payment, start date of payments, and anticipated changes in payment in the next 12 months.
- (c) Computer-generated Notice of Action.

6.5.5. Alimony or Child Support Payments.

Acceptable methods of verification include:

- (a) Copy of a separation or settlement agreement or a divorce decree stating amount and type of support and payment schedules.
- (b) A notarized letter from the person paying the support.
- (c) Family's self-certification of amount received and of the likelihood of support payments being received in the future, or that support payments are not being received.
- (d) If payments are irregular, the family must provide a statement from the agency responsible for enforcing payments to show that the family has filed for enforcement.

6.5.6. Net Income from a Business. In order to verify the net income from a business, the Management Agent will view IRS and financial documents from prior years and use this information to anticipate the income for the next 12 months. Acceptable methods of verification include:

- (a) IRS Form 1040, including:
 - i. Schedule C (Small Business)
 - ii. Schedule E (Rental Property Income)
 - iii. Schedule F (Farm Income)

- (b) Audited or unaudited financial statement(s) of the business.
- (c) Credit report or loan application.
- (d) Documents such as manifests, appointment books, cash books, bank statements, and receipts will be used as a guide for the prior six months (or lesser period if not in business for six months) to project income for the next 12 months. The family will be advised to maintain these documents in the future if they are not available.
- (e) Family's notarized statement as to net income realized from the business during previous years.

6.5.7. Child Care Business. If a Resident is operating a licensed day care business, income will be verified in the same manner as with any other business. If the family has filed a tax return, the family will be required to provide it. The Owner will conduct interim reevaluations every 60 days and require the Resident to provide a log with the information about customers and income.

6.5.8. Recurring Gifts. The family must furnish a notarized statement that contains the following information:

- (a) The person who provides the gifts;
- (b) The value of the gifts;
- (c) The regularity (dates) of the gifts;
- (d) The purpose of the gifts.

6.5.9. Zero Income Status. Each adult (18 years of age or older) household member claiming to have no income will be required to execute forms to allow the Owner to verify that the household is not receiving any income such as unemployment benefits, SSI, or the like.

6.5.10. Full-Time Student Status. Only the first \$480 of the earned income of full time students 18 years of age or older, other than head or spouse, will be counted towards family income. Financial aid, scholarships and grants received by full time students are not counted towards family income. Verification of full time student status includes:

- (a) Written verification from the registrar's office or other school official; or
- (b) School records indicating enrollment for sufficient number of credits to be considered a full-time student by the educational institution.

The admission of Full-Time Students shall be governed by Section 42 of the Internal Revenue Code and the parties acknowledge that the Owner may deny a unit to a full time student in the event that it would cause the Owner to fail to conform with Low Income Housing Tax Credit Requirements or would cause the Project's eligible fraction for tax credit purposes to fall below 100%.

6.5.11. Verification of Income Exclusions. The Owner will attempt third party verification of income exclusions wherever possible. When third party verification of income exclusions are not possible or practical, a review of documents or notarized self-certification will be obtained.

6.5.12. Income From Assets. Residents will be allowed to self-certify the value of family's assets totaling \$5000 and less.

6.5.12.1. Savings Account Interest Income and Dividends. Verification will be done using the following:

- (a) Account statements, passbooks, certificates of deposit, or the Owner's verification forms completed by the financial institution.
- (b) Broker's statements showing value of stocks or bonds and the earnings credited the family. Earnings can be obtained from current newspaper quotations or oral broker's verification.
- (c) IRS Form 1099 from the financial institution, provided that the Owner must adjust the information to project earnings expected for the next 12 months.

6.5.12.2. Interest Income from Mortgages or Similar Arrangements. Verification will be done using the following:

- (a) A letter from an accountant, attorney, real estate broker, the buyer, or a financial institution stating interest due for next 12 months. (A copy of the check paid by the buyer to the family is not sufficient unless a breakdown of interest and principal is shown.)
- (b) Amortization schedule showing interest for the 12 months following the effective date of the certification or recertification.

6.5.12.3. Net Rental Income from Property Owned by Family. Verification will be done using the following:

- (a) IRS Form 1040 with Schedule E (Rental Income).
- (b) Copies of latest rent receipts, leases, or other documentation of rent amounts.
- (c) Documentation of allowable operating expenses of the property: tax statements, insurance invoices, bills for reasonable maintenance and utilities, and bank statements or amortization schedules showing monthly interest expense.
- (d) Lessee's written statement verifying rent payments to the family and family's notarized statement as to net income realized.

7. GUESTS

Resident is permitted to have a guest in the unit for no more than fourteen calendar days during a twelve month period. The term “guest” means a person temporarily staying in the LTA Unit with the consent of Resident or other member of the household who has express or implied authority to so consent on behalf of the Resident. A household member who is absent from the unit because he or she (a) is attending college, (b) is on military duty, or (c) is under a joint custody arrangement will not considered a guest when he or she stays in the unit. Management may waive/extend the two week period of time solely at its own discretion, as circumstances warrant.

8. ABSENCE FROM THE UNIT FOR MEDICAL REASONS

If any family member leaves the household to enter a facility such as a hospital, nursing home or rehabilitation center, the Owner will seek advice from a reliable qualified source as to the likelihood and timing of the family member’s return to the unit. If the Owner verifies that the family member will be living in a nursing home and not likely to return to the unit, the family member will be considered permanently absent. If the Owner verifies that the family member will likely return in less than 180 consecutive days, the family member will not be considered permanently absent as long as the rent and other charges remain current.

9. REMAINING MEMBER OF RESIDENT’S FAMILY

A remaining member of Resident’s family is the person or persons who are listed in the lease or lease supplement as an authorized household member. A remaining member may be eligible to enter into a lease with the Owner as the new head of household. The remaining member of the resident’s family must: (a) have been previously approved by the Owner/Agent to live in the unit and (b) satisfy the applicant screening criteria set forth herein. In the event the remaining family member is a minor, the Owner may approve, as an additional household member to the lease, an adult person non-member of the Resident household, who submits written documentation of a court-ordered custody or guardianship of the minor remaining family member and who satisfies the LTA eligibility criteria,

10. ADMINISTRATIVE HEARINGS

10.1. Informal Hearing for Applicants Denied Eligibility.

10.1.1. Notice of Ineligibility Determination.

Applicants who are determined ineligible will be sent a written notice promptly by Owner.

10.1.2. Content of Written Notice of Ineligibility.

The notice of ineligibility (the “**Ineligibility Notice**”) will:

- (a) Inform the Applicant of the status of his or her application and will state the basis for the ineligibility determination;
- (b) Offer the Applicant an opportunity for an informal hearing concerning the denial of eligibility;
- (c) Specify that the Applicant must request an informal hearing within 14 working days from receipt of the notice;
- (d) Inform the Applicant of his or her right to request a reasonable accommodation in order to participate in the hearing process and provide contact information for the Applicant wishing to make such a request. Written requests for reasonable accommodations for informal hearings are preferred, but verbal requests will be accepted with a written confirmation provided back to the Applicant by the Owner. Applicants who have a disability and need a reasonable accommodation in order to participate in the informal hearing process may request a reasonable accommodation during any stage of the informal hearing process;
- (e) Inform the Applicant that a list of any witnesses or documents relied upon by the Owner will be made available to the Applicant for review prior to the informal hearing upon request. The Owner may charge Applicant the reasonable cost for reproduction of any documents requested.
- (f) Inform the Applicant that his or her attorney or advocate may attend and represent him or her at the informal hearing, to include presenting evidence to dispute determination by the Owner or evidence of mitigating circumstances, as provided in Section 4.2 hereunder. Participants, which include, but are not limited to, the Applicant, Owner and HABC may engage in appropriate and relevant conversations during the hearing;
- (g) Provide contact information for the tenant council and inform the denied Applicant that the tenant council is available to assist the Applicant with appealing a denial.

10.1.3. Scheduling the Informal Hearing.

If the Applicant requests an informal hearing, HABC will schedule an informal hearing within fourteen (14) business days of receiving the request and notify the Applicant of the place, date, and time for the hearing.

10.1.4. Hearing Officer.

Informal hearings will be conducted by an impartial hearing officer, to be designated by HABC. Audio or video recordings of the informal hearings shall be

prohibited by any participant. The person who is designated as the hearing officer cannot be the person who made the determination of ineligibility or a subordinate of that person. Housing units are not required to be held open during the period the Notice of Ineligibility is being appealed. The Owner shall wait for the appeal notice period to expire before sending denial notification to HABC for waiting list disposition purposes. Applicants shall be advised of their right to be represented by legal counsel or an advocate and present evidence to dispute the Owner's determination or evidence of mitigating circumstances.

10.1.5. Decision of Hearing Officer.

HABC will send the Applicant the written decision via first class mail within three (3) business days after the informal hearing. The written decision shall state the reasons for hearing officer's decision and the evidence provided at the hearing in support of such decision. The hearing office shall only consider evidence presented at the informal hearing in deciding whether to uphold or overturn the Notice of Ineligibility. In the event the Notice of Ineligibility is overturned by the Hearing Officer, the Applicant shall be determined eligible for the next available unit, subject to size availability.

10.2. Grievance Policy and Procedure. Grievances of the Resident shall be governed by the attached Grievance Policy and Procedure (**Exhibit 1**).

11. TRANSFERS

11.1. Owner-Initiated Transfers: The Owner will require that a Resident accept a transfer when a Resident occupies a housing unit with accessible features that are not needed for the Resident or Resident's family and a Resident or Applicant has been identified who does need the accessibility features of the unit. Failure to accept an Owner-initiated transfer will be a lease violation and may result in termination of the lease, provided that resident was provided proper notice at the beginning of the lease term that by accepting an accessible unit. The Resident may be responsible for moving costs if the unit is needed for a resident requiring an accessible unit.

Residents will be responsible for moving costs. The Owner will give the Resident 30 days' advance notice of the intended transfer. The Resident will have two (2) working days to complete the actual move and turn over possession of the vacated unit. The Resident may request, and the Owner may grant, an extension of up to three (3) working days if needed.

The Owner may require that a resident transfer because the unit is to be rehabilitated or demolished. The Owner is responsible for moving costs.

11.2 Resident Requested Transfers: A Resident must be permitted to request a transfer to another unit based upon the criteria set forth below. Valid reasons for Resident requested transfers include:

- Accessible Unit – Resident may request a unit with needed mobility or hearing/vision impaired accessibility features. If a transfer is required, the Owner is responsible for moving costs.
- Reasonable Accommodation – The Owner will provide reasonable accommodations to individuals with a disability unless the accommodation constitutes a fundamental alteration in the nature or purpose of the program or imposes an undue administrative and financial burden. Moving costs will be paid by the Owner.
- Crime Victim- Resident may request a transfer if a criminal attack, recent or ongoing, or credible threat of an imminent criminal attack against the resident, or member of the resident’s household, has destroyed the family’s peaceful enjoyment of the unit. Resident will be responsible for moving costs.
- A unit becomes uninhabitable through no fault of the resident. Moving costs will be paid by the Owner.

Except in the case of a transfer due an emergency, including the bases being the Violence Against Women Act, victim of a crime, or an uninhabitable unit, Resident must be current with all rental payments and charges due under the lease to receive approval for a Resident - requested transfer. A Resident may refuse unit transfer offers for good cause. After rejecting 3 offers, the Resident is withdrawn from the transfer waiting list, which will be administered by HABC. A Resident whose transfer is mandatory and who refuses to transfer is subject to lease termination. A Resident may file for a grievance under the Grievance Procedure if the transfer is denied or in the case of a mandatory transfer, the Resident disputes the basis for requiring the transfer.

11.3 Transfer to HABC Conventional Public Housing: In addition to the bases set forth in this Section 11, a Resident may be eligible to transfer to a suitable HABC conventional or mixed finance public housing unit, or other HABC long term affordable for the following reasons:

- To abate dangerous and/or substandard conditions within the unit that cannot otherwise be addressed.
- To abate emergency life-threatening living conditions caused by third party criminal activity.
- To accommodate verified physical conditions caused by long-term illness and/or disability (such as the ability to live closer to a required medical treatment center).
- To accommodate resident families that are determined to be over- or under-housed by virtue of family size.
- To permit the rehabilitation of the resident’s unit.
- To offer standard alternative accommodations when repairs to the unit cannot be made within a reasonable time.

HABC will always consider a request to transfer as a reasonable accommodation for a person with a disability. (See verification requirements in Section 14.) [For reasonable

accommodation transfers, HABC is responsible for moving costs. A reasonable accommodation transfer may be from a PBRA Unit to a public housing unit, or from a public housing unit to a PBRA Unit from HABC's reasonable accommodation transfer waiting list. Residents who apply for a transfer to public housing, per this Section, shall be placed on the reasonable accommodation public housing transfer waiting list based upon the date and time of filing of resident's application for reasonable accommodation.

Generally, it is preferred that transfer requests be initiated in writing. (See verification requirements in Section 14.) A reasonable accommodation request for transfer can be made orally or in writing. The Owner or HABC must give appropriate consideration to reasonable accommodation requests even if the requester makes the request orally or does not use the preferred forms or procedures for making such requests. In the event of an oral request, the Owner and Management Agent or HABC shall document the request to create a written record of the request. Except in the case of a transfer due an emergency, including the bases being the Violence Against Women Act, victim of a crime, or an uninhabitable unit, in order to be eligible for a transfer must be in good standing with HABC and the Owner at the time of the transfer.

12. LEASE REQUIREMENTS

12.1. The leasing requirements and lease terms must comply with the provisions set forth in the HUD Model Lease for Subsidized Programs (Form HUD-90105a) and 24 CFR 966, subpart A, as approved by HUD . Notwithstanding this provision, the requirements for security deposits shall comply with Section 3 hereunder, and redetermination of rent shall comply with Section 6 hereunder.

12.2. Lease Termination

-By Owner: The lease is automatically renewable for a 12-month period. Leases can only be terminated for serious or repeated violation of material terms of the lease or other good cause consistent with the requirements of 24 CFR 966.

-By Resident: The Resident may terminate the lease by providing the Agent 30-days notice, which is effective on the last day of a month.

12.2.1. Notice of Lease Termination

The notice of lease termination to the Resident shall state specific grounds for termination, and shall inform the Resident of the Resident's right to make such reply as the Resident may wish.

(a) When the Owner is required to afford the Resident the opportunity for a grievance hearing, the notice shall also:

- 1 Inform the Resident of the Resident's right to request a hearing in accordance with the Grievance Procedure (Exhibit 1);

- 2 Specify the judicial eviction procedure to be used by the Owner for eviction of the Resident, and state that HUD has determined that this eviction procedure provides the opportunity for a court hearing that contains the basic elements of due process as defined in HUD regulations; and
- 3 State whether the eviction is for criminal activity or for drug related criminal activity.

(b) When the Owner is not required to afford the Resident the opportunity for hearing under the Grievance Procedure, the notice of lease termination shall:

- (1) State that the Resident is not entitled to a grievance hearing on the termination;
- (2) Specify the judicial eviction procedure to be used by the Management Agent for eviction of the Resident, and state that HUD has determined that this eviction procedure provides the opportunity for a court hearing that contains the basic elements of due process as defined in HUD regulations; and
- (3) State whether the eviction is for criminal activity or for drug-related criminal activity.

13. THE VIOLENCE AGAINST WOMEN ACT (VAWA)

VAWA protects applicants, tenants and immediate family members of tenants who are victims of domestic violence, dating violence, or stalking from being denied, evicted or terminated from housing assistance based solely on criminal acts of domestic violence against them. Criminal acts of domestic violence against the victim shall not be considered “serious or repeated lease violations” or “criminal activity” that are grounds for termination of the lease or denial of housing assistance.

14. REASONABLE ACCOMMODATION POLICY

The Reasonable Accommodation policy is designed to provide persons with disabilities reasonable physical accommodations and reasonable modifications of policies and procedures upon request, so that they may fully access and utilize the housing program and related services. Written information regarding this policy and the procedures for making a request for a reasonable accommodation shall be posted and made available at Owner offices and, if different, at the Management office on the property. This policy is intended to afford persons with disabilities an equal opportunity to obtain the same result, to gain the same benefit, or to reach the same level of services as those who do not have disabilities. Situations in which this policy applies include, but are not limited to, when a family initiates contact with the Owner, when the

Owner initiates contact with a family including when a family applies, and when the Owner schedules or reschedules appointments of any kind.

The Owner must use and apply HABC's Reasonable Accommodation Policy and Procedures and HABC's Reasonable Accommodation Operating Order, which includes HABC's Immediate Needs Plan.

To be eligible for a reasonable accommodation, a person must have a disability. A person requesting an accommodation due to a disability should submit a Request for Reasonable Accommodation Form (the Request Form). The Request Form will be available in an alternative format to accommodate those needing such a format in order to submit the request. However, a reasonable accommodation request may also be made orally or in another equally effective means of communication. The Owner must give appropriate consideration to reasonable accommodation requests even if the requester makes the request orally or does not use the Owner's preferred forms or procedures for making such requests. The Owner will acknowledge receipt of the request within twenty (20) business days of receiving the request and, within this time period, the Owner may request additional information or documentation needed in order to make a decision regarding the request. The Owner is entitled to obtain only information that is necessary to evaluate the requested accommodation if it is necessary because of a disability, in accordance with the verification provision below in this section.

The Owner must grant the reasonable accommodation request unless it would impose an undue financial and administrative burden on the Owner or it would fundamentally alter the nature of the RAD project. The decision will be communicated in writing or, if required because of the requestor's disability, in an alternative format. If the Owner will be unable to make a decision within thirty (30) business days, it will advise the requestor in writing with the reason(s) for the delay. If the Owner finds that the requested accommodation would result in a fundamental alteration in the nature of its housing programs or activities, or in undue financial and administrative burdens, the Owner may deny the request and/or present an alternate accommodation that will meet the need of the requestor. If the Owner refuses a requested accommodation because it is not reasonable, the Owner must discuss with the requestor through an interactive process whether there is an alternative accommodation that would effectively address the requester's disability-related needs and is reasonable, the Owner must grant the accommodation. Notwithstanding any of the foregoing to the contrary, any denial of a reasonable accommodation or recommendation for an alternative accommodation must be issued by HABC's Associate Executive Director of Fair Housing and Equal Opportunity Enforcement or the Deputy Executive Director. As such, Owner must notify HABC if it believes a denial or alternative accommodation may be necessary and request HABC's review and decision regarding the reasonable accommodation request.

During the interactive process, the Owner (or Owner's agent) and the requester discuss the requester's disability-related need for the requested accommodation and possible alternative accommodations. This process can be especially helpful because it often results in an effective accommodation for the requester that does not pose an undue financial and administrative burden for the Owner. There may be instances when the Owner believes that, while the accommodation requested by an individual is reasonable, there is an alternative accommodation that would be equally effective in meeting the individual's disability-related needs. In such a circumstance, the

Owner should discuss with the individual if he or she is willing to accept the alternative accommodation. The Owner should be aware that persons with disabilities typically have the most accurate knowledge about the functional limitations posed by their disability. The individual is not obligated to accept an alternative accommodation suggested by the Owner if he or she believes it will not meet his or her needs and his or her preferred accommodation is reasonable. A failure to reach an agreement on an accommodation request is in effect a decision by the Owner not to grant the requested accommodation. For more guidance on the interactive process, see HUD and the Department of Justice's joint statement on reasonable accommodations for a description of the interactive process: <http://www.hud.gov/offices/fheo/library/huddojstatement.pdf>.

The Owner may make reasonable accommodations through such means as reassignment of services to accessible buildings, alteration of existing facilities and construction of new facilities, or any other methods that result in making its programs or activities readily accessible to and usable by individuals with disabilities.

The Owner is not required to make structural changes in existing housing facilities where other methods are effective in achieving compliance or to provide supportive services that are not part of the program.

Verification of Disability

The Owner may verify a requestor's disability only to the extent necessary to ensure that the requestor is qualified for the housing for which he or she had applied, is qualified for deductions used in determining adjusted income, is entitled to preferences that have been claimed. For reasonable accommodation requests, the Owner or HABC may only request additional information about either the requestor's disability or disability-related need for the accommodation if either is not known or readily apparent to the Owner or HABC. The Owner will not require applicants to provide access to confidential medical records in order to verify a disability and will not require specific details about the disability. The Owner may require documentation of the manifestation of the disability that causes a specific need for a specific accommodation or accessible unit if the manifestation of the disability is not known or readily apparent to the Owner or HABC.

Recertification by Mail

The Owner will permit the family to submit annual and/or interim recertification forms through the mail, when the Owner has determined that the request is necessary as a reasonable accommodation.

The mail-in packet will include notice to the family of the deadline for returning the completed forms to the Owner.

If there is more than one adult member in the household, but only one is disabled, re-certification can be processed through the mail or the family may choose to have the re-certification conducted by a home visit or to have the non-disabled adult family members come in for the

appointment and then take the necessary forms home to the member with a disability for completion and signature.

Home Visits

When requested and where the need for reasonable accommodation has been established, home visits to residents will be done to conduct annual and/or interim re-certifications.

Requests for home visit re-certifications must be received by the Owner at least five working days before the scheduled appointment date in order for the request to be considered.

15. FAIR HOUSING POLICY

It is the policy of the Owner to comply fully with all Federal, State, and local nondiscrimination and equal opportunity laws and with the rules and regulations governing Fair Housing and Equal Opportunity in housing and employment.

Owner shall not deny any family or individual the equal opportunity to apply for or receive assistance under the housing assistance programs at the RAD Site on the basis of race, color, sex, religion, national origin, ancestry, age, familial status, marital status, or disability or sexual orientation.

16. TRANSLATION OF DOCUMENTS

Consideration will be given as to whether documents which are written in English and are relevant to the Resident's tenancy will be translated into other languages. The decision to translate such documents will be based on the following factors:

- The number of Residents who do not speak English and who do speak the other language;
- The estimated cost per Resident of translation of the English written documents into the other language;
- The availability of translation services for non-English speaking Residents.

17. LANGUAGE ASSISTANCE

Readers will be provided to assist Residents with literacy barriers in completing documents relating to their tenancy.

18. AVAILABILITY OF DOCUMENTS

A copy of each of the following documents will either be posted in a conspicuous location at the management office for the site or will be provided to the Resident:

- The LTA Criteria;

- Schedule of maintenance charges;
- Dwelling Lease;
- Grievance Policy and Procedure;
- Fair Housing poster;
- Equal Opportunity in Employment poster;
- Required public notices;
- Schedule of Utility Allowance, as applicable;
- Information on eviction for drug-related and other criminal activity

19. RESIDENT PARTICIPATION

Residents are authorized to participate in all activities set forth in 24 CFR Part 245.

All residents in PBRA Units are eligible to participate in tenant council activities and also eligible to serve on the Resident Advisory Board and serve as commissioners at HABC. The Owner has budgeted in its initial operating budget the sum of twenty-five (\$25.00) per occupied PBRA Unit annually for permitted resident participation activities.

20. COMPLIANCE WITH APPLICABLE LAWS

This LTA Criteria shall not violate State or Federal law. In the event the admissions and leasing criteria are deemed to be in violation of either State or Federal law, or both, and in the event that a waiver of any such law cannot be obtained, they shall be amended to ensure that said violations are cured and that they remain in compliance with applicable law.

EXHIBIT 1
**LONG TERM AFFORDABLE
RESIDENT GRIEVANCE POLICY AND
APPEALS PROCEDURE**

I. PURPOSE

This Long Term Affordable Resident Grievance Policy and Appeals Procedure (the “**Grievance Procedure**”) is established to assure that Residents of the PBRA Units are afforded an opportunity for a fair hearing if the Resident disputes (i) an action or failure to act by the Owner involving the Resident's lease, or (ii) the Owner’s regulations which adversely affect the Resident’s rights, duties, welfare or status. Neither housing assistance nor tenancy shall be terminated until such time as the grievance process has been completed. This Grievance Procedure shall be incorporated by reference into the dwelling lease.

II. APPLICABILITY AND DEFINITIONS

1. This Grievance Procedure shall be applicable to all resident grievances, except the following:
 - A. Refusal to pay rent when due, unless the amount of rent charged is in dispute;
 - B. Disputes between Residents not involving Owner or Management Agent;
 - C. Class grievances;
 - D. Any criminal activity that threatens the health, safety or the right to peaceful enjoyment of the premises of other residents or employees of the Owner or Management Agent;
 - E. Any violent or drug related criminal activity on or off the premises of other residents or employees of the Management Agent;
 - F. Any criminal activity that resulted in felony conviction of a household member; or
 - G. Any lease termination due to the occupancy of person subject to a sex offender lifetime registration requirement.
2. Maryland law requires that Residents be given the opportunity for a court hearing before eviction from a dwelling unit. Thus, where the Grievance Procedure does

not apply, the Management Agent or Owner is still required to use proper judicial process.

3. The following definitions are applicable to this Grievance Procedure:

A. Class Grievance: Any grievance in which the decision on an individual grievance would be, as a practical matter, dispositive of the interests of other Residents.

B. Complainant: Any resident, as defined in below, who presents to the Management Agent a grievance in accordance with the procedures set forth herein.

C. Grievance: Any dispute that a Resident may have with respect to the Management Agent's action or failure to act in accordance with the individual Resident's lease or regulations which adversely affect the individual Resident's rights, duties, welfare or status, including any dispute about the amount of rent that is charged. The definition of "grievance" does not include the matters set forth in Section II.1. A through G above.

D. Resident: The adult person (or persons, other than a live-in aide, as defined in the lease): (1) who resides in the unit, and who executed the lease with the landlord of the dwelling unit, or (2) if no such person now resides in the unit, the person who resides in the unit, and is the remaining head of household of the Resident family residing in the dwelling unit.

III. INFORMAL DISCUSSION OF GRIEVANCE

As much as possible should be left to the mutual efforts of Management Agent or the Owner and Resident, with both parties attempting to resolve all complaints as quickly and justly as possible. However, the Resident may present a grievance for any complaint which cannot be resolved by such methods, and the following procedure will apply in grievances based on lease termination notices that are subject to the grievance policy. For all non-lease termination grievances, the time periods for the informal discussion and formal grievance hearing shall be as follows:

A. The Complainant shall, either orally or in writing, present a description of the grievance to the Management Agent Office within twenty (20) working days after the Management Agent's action or failure to act, giving rise to the grievance, so that the grievance may be discussed informally and settled without a formal hearing (the "Informal Discussion"). Forms for requesting an Informal Discussion or formal grievance hearing shall be available from the Management Agent or Owner. Use of the request form is optional.

- B. The Resident shall receive a receipt upon presentation of the grievance stating the date of filing and the nature of his/her grievance, and a copy will be retained in the Management Office's Resident file.
- C. The Management Agent or Owner, in concert with the Complainant, will establish a mutually agreeable date, time and place for the Informal Discussion.
- D. The Management Agent or Owner shall mail to the Resident within three (3) working days after the meeting, a summary of the Informal Discussion and his/her decision regarding the proposed disposition of the complaint and the specific reason thereof ("Summary Decision"). The Summary Decision shall specify the procedures by which a hearing may be obtained if the Complainant is not satisfied.

IV. PROCEDURE TO OBTAIN A HEARING

- A. Request for Hearing: If the Complainant is not satisfied with the results of the Informal Discussion, the Complainant shall submit a written request for a hearing to the Management Agent or Owner, no later than ten (10) working days after the date Complainant receives the Summary Decision, pursuant to Section III above. The written request shall specify: (1) the reasons for grievance; and (2) the action of relief sought.
- B. Hearing Prerequisite: All grievances shall be presented either orally or in writing pursuant to the procedures prescribed in Section III. above as a condition precedent to a hearing, unless the Complainant obtains a waiver of this prerequisite from a Hearing Panel.
- C. Waiver of the Hearing Prerequisite:

In order to request a waiver of the hearing prerequisite, the Complainant must show good cause for failing to request and proceed with an Informal Discussion, and shall comply with the following:

1. Within three (3) working days after the deadline for presenting a grievance in accordance with the procedures for an Informal Discussion the Complainant shall submit to the Management Office a request for a waiver of this hearing prerequisite.
2. A hearing will be convened before a Hearing Panel in order to decide whether the hearing waiver request will be granted.
3. The Complainant shall appear before the Hearing Panel to show why he or she failed to proceed within the time period for the Informal Discussion.

4. If the Hearing Panel decides the Complainant has shown good cause for his or her failure to proceed within the time period for the Informal Discussion, the Hearing Panel may grant the waiver.
 5. If the Informal Discussion prerequisite is waived, the Hearing Panel will immediately set a date for a hearing concerning the Complainant's grievance.
- D. Failure to Make a Timely Request for a Hearing: If the Complainant does not make a request for a hearing within five (5) working days after receipt of the Summary Discussion, Management Agent's or Owner's disposition of the grievance shall become final. Failure to request a hearing shall not constitute a waiver by the Complainant of his or her right thereafter to contest Owner's action in disposing of the complaint in an appropriate judicial proceeding.
- E. Escrow Deposit: In any grievance involving the amount of rent or any part thereof, as defined in the lease, which the Management Agent or Owner claims is due under the lease, and which has not been paid, the Complainant shall pay to Management Agent or Owner at the time the Complainant files his or her request for a formal hearing, an amount at least equal to the amount of rent due and payable as of the first of the month preceding the month in which the act or failure to act took place. The Complainant shall thereafter pay the same amount of the monthly rent to the Management Agent or Owner, and the Management Agent or Owner shall deposit the monies in an escrow account until the grievance is resolved by decision of the Hearing Panel. Following this decision, any amount due the Complainant from the escrow deposits shall be returned in full to him or her within 30 days.

These requirements for escrow deposit must be waived by Management Agent or Owner:

1. in the event Management Agent or Owner determines, upon request by the Complainant, that the Complainant is unable to pay the escrow deposit because of a financial hardship in accordance with the requirements under the lease, or
2. for the portion of the Complainant's rent attributable to the imputed welfare income.

Unless so waived, the failure to make such payments shall result in a termination of the grievance procedure, provided that failure to make payment shall not constitute a waiver of any right the Complainant may have to contest Management Agent's or Owner's disposition of his or her grievance in an appropriate judicial proceeding.

- F. Scheduling of Hearings: Upon Complainant's compliance with all applicable procedures or waiver, the formal grievance hearing will be scheduled within five (5)

working days of the Complainant's request. The hearing will be held before a Hearing Panel. A written notification shall be delivered by hand or by regular mail, specifying time, the place and the procedure governing the hearing, to the Complainant, the Management Agent or Owner, and the members of the Hearing Panel.

V. SELECTION OF HEARING PANEL

- A. The grievance shall be presented before a Hearing Panel consisting of five (5) voting persons and a Secretary (who is non-voting) for record keeping purposes who will be provided by the Management Agent or the Owner or HABC. If the Resident Council at the RAD Site is part of the Resident Advisory Board ("RAB"), then RAB will select two (2) panel members. If the Resident Council is not a part of RAB, two residents from a different RAD Site or a HABC public housing development will be selected as panel members. The Management Agent or the Owner and/or HABC will select two (2) panel members. Additionally, one (1) impartial member will be selected from a list of names previously compiled by HABC. The Hearing Panel shall not include any of the following persons:
1. Any relatives of the Complainant or Management Agent or the Owner;
 2. Any person from the Complainant's development;
 3. Any person whose duties, responsibilities or knowledge involve the grievance at issue; and
 4. Any person whose duties, responsibilities or knowledge involve the operation of the development.

VI. PROCEDURES GOVERNING THE HEARING

- A. If the hearing is held before a Hearing Panel, three members, including the impartial member, shall constitute a quorum for the hearing. The impartial member shall act as moderator at the hearing. His or her responsibilities will include coordinating all activities associated with the hearing, such as calling witnesses and maintaining order, and generally insuring that the hearing is conducted in a fair and orderly manner.
- B. The Complainant shall be afforded a fair hearing providing the basic safeguards of due process, which shall include:
1. The opportunity to examine before the hearing any HABC documents and to copy all documents, records and regulations of Management Agent or Owner, that are relevant to the hearing. Any document relevant to the hearing which Management Agent or Owner does not make available after request thereof by the Complainant, may not be relied on by Management Agent or Owner at the hearing. The copying of documents, which Management Agent or Owner intends to use in responding to the grievance,

shall be done at the expense of Management Agent or Owner. All other documents shall be copied at the expense of the Complainant.

2. The right to be represented by Counsel or other person chosen by the Complainant as his or her representative.
 3. The right to a private hearing (which includes only the Hearing Panel members, the Complainant, the Housing Manager, the Panel Secretary, Counsel or representative from both sides and witnesses) unless the Complainant requests a public hearing.
 4. The right to present evidence and arguments in support of his or her complaint, to controvert evidence relied on by Management Agent or Owner, and to confront and cross examine all witnesses upon whose testimony or information Management Agent or Owner relies.
 5. The right to a decision based solely and exclusively upon the facts presented at the hearing.
 6. The Hearing Panel shall hear each case and judge it on its own merit.
- C. The Management Agent or Owner and Complainant shall exchange a listing of witnesses that each intends to call upon at the hearing.
- D. If the Complainant or Management Agent or Owner fails to appear at a scheduled hearing, the Hearing Panel may make a determination to postpone the hearing, or may make a determination that the party has waived the right to a hearing. Both the Complainant and Management Agent or Owner shall be notified of the determination by the Hearing Panel, provided that a determination that the Complainant has waived the right to a hearing shall not constitute a waiver of any right the Complainant may have to contest disposition of the grievance by Management Agent or Owner in an appropriate judicial proceeding.
- E. At the hearing, the Complainant must first make a showing of an entitlement to the relief sought and thereafter Management Agent or Owner must sustain the burden of justifying Management Agent or Owner's action or failure to act against which the complaint is directed.
- F. The hearing shall be conducted informally by the Hearing Panel, and oral or documentary evidence pertinent to the facts and issues raised by the complaint may be received without regard to admissibility under the rules of evidence applicable to judicial proceedings. Failure to comply with the directions of the moderator of the Hearing Panel for order may result in exclusion from the proceedings.
- G. Upon request of either or both parties, the hearing shall be recorded. The Complainant or Management Agent or Owner may arrange, in advance and at the

expense of the party making the arrangement, for a transcript of the hearing. Any interested party may purchase a copy of such transcript.

VII. DECISION OF THE HEARING PANEL

- A. The Hearing Panel shall prepare a written decision, together with the reasons thereof, within three working days after the hearing. A copy of this decision shall be sent to the Complainant, and the Management Agent or Owner. The Management Agent or Owner shall retain a copy of the decision in the Resident's folder in the Management Office. A copy of such decision, with all names and other personal identifying references deleted, shall also be maintained on file by Management and made available for inspection or purchase by a prospective Complainant, his representative, and the Hearing Panel. The decision of the Hearing Panel constitutes the decision of the Owner.
- B. If the grievance is in reference to monies due under the tenancy, and or Hearing Panel rules in favor of Management Agent or Owner, a written agreement will be made between the Complainant and the Management Agent or Owner for payment of the amount due and the schedule for payment.
- C. The decision of the Hearing Panel shall be binding on Management Agent or Owner, which shall take all action, or refrain from any action necessary to carry out the decision, unless the decision of the Hearing Panel is contrary to applicable Federal, State or local law or applicable regulations, or the HABC Moving to Work Agreement and Annual Plan.
- D. A decision by the Hearing Panel denying the relief requested by the Complainant in whole or in part shall not constitute a waiver of, nor affect in any manner whatsoever, any rights the Complainant may have in any judicial proceedings, which may thereafter be brought in the matter.

VIII. NOTICE TO VACATE AND EVICTION ACTIONS

If the Complainant's grievance hearing was due to a complaint concerning a notice of lease termination, and the Hearing Panel upholds Management Agent or Owner's action to terminate the tenancy, Management Agent or Owner shall issue to the Resident a Notice to Vacate prior to commencing an eviction action. The Notice to Vacate shall not be issued prior to the Hearing Panel's decision having been delivered by hand or by regular mail to the Complainant. Such Notice to Vacate must be in writing and specify that if the Resident fails to quit the premises within the applicable statutory period, or by the termination date stated in the notice of termination, whichever is later, appropriate action for eviction will be brought against him/her and he/she may be required to pay court costs, and attorney's fees if the Management Agent or Owner prevails in the eviction action.

IX. ACCOMMODATIONS

Upon notification made by the Resident (a) upon the Resident's request for an informal grievance, and (b) upon the Resident's request for a formal grievance, the Management Agent or Owner will provide reasonable and accessible accommodations for residents with qualified disabilities and ensure that communication is as effective as that provided to individuals without disabilities. Moreover, the Management Agent or Owner shall take appropriate steps to ensure that communications with participants with disabilities are as effective as communications with others, which may include, but not be limited to, enlarged print, a signer, audio communication, Braille, or a reader.

X. TIME PERIODS

In computing time periods set forth herein, Saturdays, Sundays and holidays observed by the Management Agent or Owner shall not be included.

LONG TERM AFFORDABLE UNITS

PET POLICY

APPLICABILITY

This Pet Policy and any amendments thereto, shall apply to all Residents of the LTA Units. This Pet Policy, as it may be amended from time to time, shall be incorporated into and made a part of the Resident's lease..

Exclusion from Applicability. This Pet Policy does not apply to animals that assist, support, or provide service to persons with disabilities. The Management Agent or Owner shall not apply nor enforce this Pet Policy against animals that are necessary as a reasonable accommodation to assist, support, or provide service to persons with disabilities. This exclusion applies to such animals that reside at and visit the Development.

DEFINITIONS.

The term "**Pet**" is defined as a domesticated small animal limited to dogs, cats, gerbils, hamsters, guinea pigs, birds, (parakeet, canary, finches, cockatoo, small parrot) and fish. **The following breeds are excluded from the definition of Pet, and shall be expressly prohibited from being kept, owned or harbored in, on or about the Premises (as that term is defined in the Lease) by any Resident or any member of the Resident's household: PIT BULLS, ROTTWEILERS, CHOW-CHOWS, BULL MASTIFFS, DOBERMAN PINSCHERS, AND ANY CROSS-BREED THEREOF, AND ANY WOLF OR PART WOLF.**

REQUIREMENTS

1. **Number Limitations** - No more than one domesticated Pet, and/or one 20-gallon tank of fish will be kept in a Unit. Heads of household shall be responsible for their Pet. The Resident must maintain the Pet responsibly and in accordance with applicable State and local public health, animal control, and animal anti-cruelty laws and regulations.
2. **Size of Pet** - Dogs or cats or others defined in paragraph 1 shall weigh no more than twenty (25) pounds at maturity. Fish are limited to a single bowl or steel framed glass fish tank having a capacity of not more than twenty (20) gallons. Birds can be no larger than one (1) pound.
3. **Resident's Health** - A Pet owner must be physically and mentally capable of taking care of the Pet.

4. **Pet Security Deposit** - A refundable Pet security deposit of twenty-five dollars (\$25.00) shall be required for each Pet. The Pet security deposit can be paid over a three (3) month consecutive period, and will be held and applied in the manner required for applicable security deposits under Maryland law. **IF THE SECURITY DEPOSIT IS NOT NEEDED TO REPAIR DAMAGE TO THE UNIT CAUSED BY THE PET, THE PET SECURITY DEPOSIT WILL BE RETURNED WITHIN 45 DAYS OF MOVE-OUT OR IF A PET IS REMOVED BEFORE RESIDENT MOVES FROM THE DWELLING UNIT, WITHIN 45 DAYS OF PET REMOVAL.**
5. Upon move-out or Pet removal the cost to de-flea, deodorize, and clean the carpet and/or floor tile will be deducted from the Pet security deposit if deemed necessary by Management. The Dwelling Unit will be inspected and the remainder of the Pet security deposit will be refunded, if the Dwelling Unit is free of damage. The move-out inspection will be performed by the Resident and Management.

The Pet security deposit may only be applied to damages caused by the Pet.

6. **Hold Harmless** – The Management Agent or Owner shall not be responsible for any actions or injuries or damages caused by the Resident’s Pet. A Pet is the sole responsibility of the Resident.
7. **Vaccinations** – Every Pet, if required by law, must wear a current City Animal license and be vaccinated. Resident must submit registration papers to the Management Office. A copy of the Pet’s (dog or cat) current inoculation and treatment is to be furnished and verified annually by a licensed veterinarian which must indicate dates of most recent shots and treatment against disease and parasites as follows:
 - (a) Dogs – rabies, parvo-virus, para-influenza, distemper, hepatitis, leptospirosis (D.H.L.), hookworm, heartworm, roundworm, tapeworm, and other internal and other parasites, fleas, ticks and other external parasites and other diseases of the skin including eczemas.
 - (b) Cats – rabies, rhinotracheitis, calici virus, pnemonitis, tapeworms, hookworms, heartworms, and other internal parasites, fleas, lice, ticks and other external parasites.

Female cats and dogs over six months of age must be spayed and males over eight months must be neutered, unless a licensed veterinarian gives medical reasons why such is detrimental to the Pet’s health.

8. **Housekeeping** – The Unit must be kept free of odors and maintained in a clean and sanitary condition. Cats must be litter box trained and dogs must be able to exercise outside the Dwelling Unit. Litter boxes must be changed a minimum of once a week and scooped once a day. Kitty litter is to be bagged securely in a heavy plastic trash bag, tied, and disposed of in an approved trash receptacle.

- (a) Birds must be maintained in a cage and never allowed to fly free within the Dwelling Unit.
 - (b) Dog and cat bedding and the Dwelling Unit are to be kept free of and treated regularly on an ongoing basis against infestations by fleas, ticks, lice, pet worms, mites, and other parasites. If infestation of any such parasites or vermin occur which shall be determined by Management to have occurred due to inattentive care by the Pet owner, and/or if such infestation shall spread to other Dwelling Units, Management shall have the right to eradicate in all affected areas at Pets owner's expense.
 - (c) Pet owners must control excessive noise and odor caused by their Pets.
9. **Pet Control in Public Area** – Pets must be on a leash outside of the Dwelling Unit and in all public areas. Under no circumstances may any Pet of any kind be taken into, or permitted to be in, the recreation/community rooms, or any other “common” room.
10. **Waste Control** – Pet owners shall be responsible for immediate clean up of Pet feces in accordance with applicable law. Resident must insure that their yard is kept clear of Pet feces. Resident will not place any animal fecal waste, kitty litter, etc., or other articles in the sinks, plumbing fixtures or on the grounds. Residents must place all Pet waste in a heavy plastic trash bag, tied and disposed of in an approved trash receptacle. If a toilet has to be unclogged or a sink unstopped because of animal waste, kitty litter, and/or stones from a fish bowl, the Resident will pay all associated cost.
11. **Nuisance** – If, in the judgment of Management, any Pet becomes a threat to the safety and comfort or quiet enjoyment of the Premises to any other Resident, employee, or visitor to the Premises, or if such Pet causes substantial damage to any part of the building or grounds or the furnishings and fixtures thereof, then, upon the written request of Management, such Pet shall be permanently removed from the Premises by the Pet's owner within five (5) days.
- If the Resident files a grievance the Pet shall be allowed to remain until the grievance process is exhausted. In the case of a Pet biting a person, the Pet must be immediately removed to an area for surveillance for a period designated by a Health Officer and must then be examined by a licensed Veterinarian. Animal bites must also be reported to the local Health Department and/or the Police. A bite victim or parent of a child bitten by an animal can swear out a complaint against the owner of the Pet at the nearest district court. Refusal by the Pet owner to abide by Management Agent's or Owner's request for a Pet's removal may result in termination of residency.
12. **Complaints/Problems** – Any and all complaints about Pets will not be considered valid (or heard) unless they are in writing, dated and signed by the person(s) making the complaint. Management Agent or Owner will review complaints and/or problems concerning a Pet/Pet owner. Management Agent or Owner will notify in writing the Pet owner of the complaint and the Resident will have 24 hours to answer the complaint.

Two or more legitimate complaints will mean the Pet must be removed unless the Pet owner initiates a grievance procedure. Failure to comply may result in termination of residency.

13. **Resident's Absence** – No dog or cat shall be left alone in any Unit over twenty-four (24) hours. Any Resident who is away twenty-four (24) hours or longer for any reason must make arrangements for such Pet to be kept elsewhere during his/her absence.
14. **Responsibility for Pet in an Emergency** – The Pet owner shall file with the Management an affidavit of agreement signed by one (1) person who is not a Resident of the Unit who will assume immediate responsibility for the Pet in case of an emergency or in case the Pet owner becomes unable to provide proper care for the Pet. In addition, the Pet owner shall file with Management Agent or Owner an affidavit authorizing Management Agent or Owner to have the Pet removed in the event that the Pet owner cannot care for the Pet and the responsible party cannot be reached. Management Agent or Owner will contact the SPCA or an appropriate authority for removal of the Pet in such event
15. **Fire Emergency** – When a fire alarm or smoke detector sounds, Pets are to be placed in the bathroom and the door is to be closed. If evacuation is necessary the fire department will be responsible for the evacuation of Residents first, and then the Pet.
16. **Subsequent Agreements** – If a Resident has an approved Pet and that Pet is disposed of, the Resident must notify Management Agent or Owner. The Resident and Management Agent or Owner will perform an inspection of the apartment. The Pet security deposit will be used towards any damages and the balance, if any, of the Pet security deposit will be returned to the Resident within 45 days. If the Resident determines they want a new Pet, the Pet must be registered with the Management Office and a new Pet security deposit must be collected in accordance with the Pet Policy.
17. **Resident's Signature** – All Residents, whether desiring a Pet or not, must sign this Attachment to the Lease, thereby acknowledging agreement and acceptance of the Pet Policy. Those Residents desiring a Pet will have to meet all requirements listed in this Attachment and sign the “Application for Pets” including Section 3 which includes the “Co-Responsibility” section for a non-Resident friend or relative to sign.
18. The Management Agent or Owner reserves the right to rescind or change any of the foregoing rules to make such rules and regulations as may be deemed necessary for the safety, care and cleanliness of the Premises, and for the security, comfort and convenience of all Residents. Any changes deemed necessary by the Management Agent or Owner will be made in compliance with the Lease.
19. This Pet Policy is made a part of the HABC Dwelling Lease and any violation of the terms and conditions contained herein, will be considered a breach of the Lease. If any Court declares a particular provision of this Pet Policy to be invalid or illegal, all other terms of this Pet Policy will remain in effect, and both the Management Agent or Owner

and the Resident will continue to be bound by all valid, legitimate terms of the Pet Policy.

AGREED AND ACCEPTED BY RESIDENT(S):

DATE:

ADDRESS: _____

**MANAGEMENT AGENT'S
SIGNATURE:** _____

DATE: _____

APPENDIX A:

APPLICATION FOR PETS

APPLICATION FOR PETS

Date: _____

SECTION I

I, _____ and _____

Resident(s) of _____, living at _____ verify

I have received, reviewed, understand and accept the Pet Policy Regarding Pets Admittance and Ownership at _____. I am also aware that the Pet Policy is an official part of my Lease, and that I am to abide by all its terms.

Resident Signature:

Date:

SECTION II

Pet Description: Type: _____ Sex: _____

Weight: _____ Age: _____ Name: _____

Color and Markings: _____

Pet Security Deposit Required: _____ Pet Security Deposit Paid: _____

Veterinarian's Name: _____

Address: _____

Telephone Number: _____

SECTION III

I, _____, (non Resident) relative /friend (circle one) of

Resident _____,
(Resident's Name)

live at _____, and I agree
(Non-Resident's Address)

to accept full responsibility of the Pet listed above in the event the said Resident is unable to care for the Pet in any twenty-four hour period.

Print Name: _____ Date: _____

Signed: _____ Date: _____

Telephone Number: _____

Resident Signature: _____ Date: _____

Telephone Number: _____

Management Agent's Signature: _____ Date: _____

SECTION IV

I, _____
(Name of Management Agent or Owner)

Management Agent or Owner, permit the ownership by Resident of the Pet described as _____

at the following address:_____.

Management Agent or Owner's Signature:_____

Date:_____

RESIDENT LEASE AGREEMENT

I hereby acknowledge my right as a Resident to keep a household Pet as defined in paragraph 1 of the Pet Policy.

I agree to comply with this Pet Policy (an Attachment to the Lease) with the understanding that violation of this Pet Policy may be grounds for Pet removal or termination of tenancy.

MANAGEMENT AGENT:_____ **RESIDENT:**_____

By:_____

RESIDENT:_____

Title:_____

Date:_____

Date:_____

Appendix S:
RAD Mixed-Population Information

**Appendix R:
Rental Assistance Demonstration Information**

Name of Public Housing Development	PIC Development ID	Conversion Type	Transfer of Assistance
Rosemont	MD002000070	PBRA	None
Total Units	Pre-RAD Unit Type	Post-RAD Unit Type	Capital Fund Allocation of Development
203	Elderly/Disabled	Elderly/Disabled	\$257,447.00
CHAP Award Date: 6/24/2015			
Bedroom Type	Number of Units Pre-RAD	Number of Units Post-RAD	Change in Units and Why
Studio			
1-Bedroom	203	203	None
2-Bedroom	-	-	-
3-Bedroom	-	-	-
4-Bedroom	-	-	-
5-Bedroom	-	-	-
6-Bedroom	-	-	-
If Performing a Transfer of Assistance:	None		

Name of Public Housing Development	PIC Development ID	Conversion Type	Transfer of Assistance
Monument East	MD002000043	PBRA	None
Total Units	Pre-RAD Unit Type	Post-RAD Unit Type	Capital Fund Allocation of Development
170	Elderly/Disabled	Elderly/Disabled	\$204,231.00
CHAP Award Date: 6/24/2015			
Bedroom Type	Number of Units Pre-RAD	Number of Units Post-RAD	Change in Units and Why
Studio	70	70	None
1-Bedroom	100	100	None
2-Bedroom	-	-	-
3-Bedroom	-	-	-
4-Bedroom	-	-	-
5-Bedroom	-	-	-
6-Bedroom	-	-	-
If Performing a Transfer of Assistance:	None		

**Appendix R:
Rental Assistance Demonstration Information**

Name of Public Housing Development	PIC Development ID	Conversion Type	Transfer of Assistance
J Van Story - West Twenty	MD002000041	PBRA	None
Total Units	Pre-RAD Unit Type	Post-RAD Unit Type	Capital Fund Allocation of Development
357	Elderly/Disabled	Elderly/Disabled	\$409,671.00
CHAP Award Date: 6/24/2015			
Bedroom Type	Number of Units Pre-RAD	Number of Units Post-RAD	Change in Units and Why
Studio	221	221	None
1-Bedroom	136	136	None
2-Bedroom	-	-	-
3-Bedroom	-	-	-
4-Bedroom	-	-	-
5-Bedroom	-	-	-
6-Bedroom	-	-	-
If Performing a Transfer of Assistance:	None		

Name of Public Housing Development	PIC Development ID	Conversion Type	Transfer of Assistance
Somerset	MD002000042	PBRA	None
Total Units	Pre-RAD Unit Type	Post-RAD Unit Type	Capital Fund Allocation of Development
60	Family	Family	\$97,660.00
CHAP Award Date: 12/24/2013			
Bedroom Type	Number of Units Pre-RAD	Number of Units Post-RAD	Change in Units and Why
Studio	0	0	
1-Bedroom	0	8	To meet the needs of existing residents
2-Bedroom	0	17	To meet the needs of existing residents
3-Bedroom	32	22	Reduction of 10 units pursuant to the HUD De Minimis rule
4-Bedroom	20	11	Reduction of 9 units pursuant to the HUD De Minimis rule
5-Bedroom	4	0	Reduction of 4 units pursuant to the HUD De minimis rule
6-Bedroom	4	0	Reduction of 4 units pursuant to the HUD De Minimis rule

**Appendix R:
Rental Assistance Demonstration Information**

If Performing a Transfer of Assistance:	None

Name of Public Housing Development	PIC Development ID	Conversion Type	Transfer of Assistance
Hillside Park	MD002000105	PBRA	None
Total Units	Pre-RAD Unit Type	Post-RAD Unit Type	Capital Fund Allocation of Development
30	Family	Family	\$22,558.00
CHAP Award Date: 01/30/15			
Bedroom Type	Number of Units Pre-RAD	Number of Units Post-RAD	Change in Units and Why
Studio			
1-Bedroom	1	1	None
2-Bedroom	29	29	None
3-Bedroom			-
4-Bedroom			-
5-Bedroom	-	-	-
6-Bedroom	-	-	-
If Performing a Transfer of Assistance:	None		

Name of Public Housing Development	PIC Development ID	Conversion Type	Transfer of Assistance
Arbor Oaks	MD002000101	PBRA	None
Total Units	Pre-RAD Unit Type	Post-RAD Unit Type	Capital Fund Allocation of Development
62	Family	Family	\$42,282.00
CHAP Award Date: 6/24/2015			
Bedroom Type	Number of Units Pre-RAD	Number of Units Post-RAD	Change in Units and Why
Studio			
1-Bedroom	31	31	None
2-Bedroom	31	31	None
3-Bedroom			-
4-Bedroom			-
5-Bedroom	-	-	-
6-Bedroom	-	-	-
If Performing a Transfer of Assistance:	None		

**Appendix R:
Rental Assistance Demonstration Information**

Name of Public Housing Development	PIC Development ID	Conversion Type	Transfer of Assistance
Townes at the Terraces	MD002000106	PBRA	None
Total Units	Pre-RAD Unit Type	Post-RAD Unit Type	Capital Fund Allocation of Development
203	Family	Family	\$175,493.00
CHAP Award Date: 06/24/2015			
Bedroom Type	Number of Units Pre-RAD	Number of Units Post-RAD	Change in Units and Why
Studio	0	0	
1-Bedroom	0	0	
2-Bedroom	78	78	None
3-Bedroom	110	110	None
4-Bedroom	15	15	None
5-Bedroom	0	0	
6-Bedroom	0	0	
If Performing a Transfer of Assistance:	None		

Name of Public Housing Development	PIC Development ID	Conversion Type	Transfer of Assistance
Heritage Crossing	MD002000111	PBRA	None
Total Units	Pre-RAD Unit Type	Post-RAD Unit Type	Capital Fund Allocation of Development
75	Family	Family	\$65,317.00
CHAP Award Date: 06/24/2015			
Bedroom Type	Number of Units Pre-RAD	Number of Units Post-RAD	Change in Units and Why
Studio	0	0	
1-Bedroom	6	6	None
2-Bedroom	22	22	None
3-Bedroom	39	39	None
4-Bedroom	8	8	None
5-Bedroom	0	0	
6-Bedroom	0	0	
If Performing a Transfer of Assistance:	None		

**Appendix R:
Rental Assistance Demonstration Information**

Name of Public Housing Development	PIC Development ID	Conversion Type	Transfer of Assistance
Homes for Arundel	MD002000118	PBRA	None
Total Units	Pre-RAD Unit Type	Post-RAD Unit Type	Capital Fund Allocation of Development
58	Family	Family	\$54,554.00
	CHAP Award Date: 6/24/2015		
Bedroom Type	Number of Units Pre-RAD	Number of Units Post-RAD	Change in Units and Why
Studio			
1-Bedroom	1	1	
2-Bedroom	7	7	-
3-Bedroom	44	44	-
4-Bedroom	6	6	-
5-Bedroom	-	-	-
6-Bedroom	-	-	-
If Performing a Transfer of Assistance:	None		