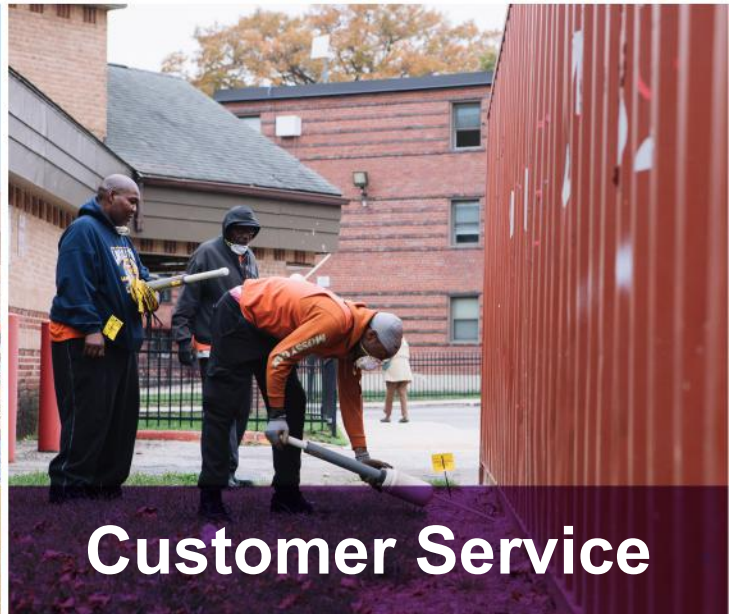


2019 MTW Annual Plan

Housing Authority of Baltimore City
A Moving to Work Agency
Fiscal Year 2019



**HOUSING
AUTHORITY of
BALTIMORE CITY**

HOUSING AUTHORITY OF BALTIMORE CITY

**The Moving to Work Annual Plan
Fiscal Year 2019**

**Released for Public Comment:
February 26, 2018**

**Public Hearing:
March 22, 2018 from 6:00-8:00PM
201 N. Aisquith Street
Baltimore, MD. 21202**

**Approved by the HABC Board of Commissioners April 11, 2018
Submitted to HUD April 13, 2018, July 31, 2018, December 21, 2018, and
March 14, 2019
Approved by HUD April 1, 2019**

Moving to Work Annual Plan - Fiscal Year 2019
Table of Contents

I. INTRODUCTION AND OVERVIEW.....	1
A. Background on the Moving To Work Demonstration	1
B. MTW Long-Term Goals and Objectives	2
C. MTW Goals and Objectives for Fiscal Year 2019	4
II. GENERAL HOUSING AUTHORITY OPERATING INFORMATION	8
A. Planned New Public Housing Units	8
Table 1: Planned New Public Housing Units in FY 2019	8
B. Planned Demolition or Disposition of Public Housing Units	8
Table 2: Planned Public Housing Units/Lots to Be Removed in FY 2019	9
C. Planned New Housing Choice Vouchers to be Project-Based	10
Table 3: New Housing Choice Vouchers to be Project-Based in FY 2019	10
D. Rental Assistance Demonstration Program.....	11
Table 4: Planned and Completed RAD Conversions	11
E. Other Planned Changes to Housing Stock	12
F. Capital Program Activities	13
Table 5: Planned Capital Fund Expenditures in FY 2019DA	14
A. DEVELOPMENT INITIATIVES	20
B. Planned Number of Households Served	22
C. Reporting Compliance with Statutory MTW Requirements.....	25
D. Anticipated Leasing Issues.....	25
Table 8: Potential Leasing Issues and Solutions	25
E. Waiting List Information for Beginning of FY 2019	25
Table 9: Waiting List Information	26
III. PROPOSED MTW ACTIVITIES	29
Activity 2019-01: Rent Simplification	29
Activity 2019-02: Local Fair Market Rent	31
Activity 2019-03: Project-Based Voucher Amendments to the HAP Contract.....	33
IV. ONGOING MTW ACTIVITIES.....	36
A. Implemented Activities	36
Activity 2006-01: Multi-Year Recertifications	36
Activity 2006-02: Enhanced Project Based Voucher Program	36
Activity 2006-03: Thompson Biennial Recertifications	37
Activity 2007-01: Mobility Program Enhancements	38
Activity 2010-01: Unit Sizes.....	39
Activity 2010-02: Bailey Long-Term Affordable Project-Based Voucher Contract	39
Activity 2010-03: Thompson Risk Based Inspections	40
Activity 2012-01: Rent Simplification - Thompson.....	41
Activity 2014-01: HABC Long-Term Affordable Project-Based Voucher Contract.....	41
Activity 2017-01: Sponsor-Based - Project-Based Transitional Housing	42
Activity 2018-01: Landlord Payment Methods and Electronic Communications	43
B. Not Yet Implemented	45
C. Activities on Hold	45
D. Closed Out Activities	47

V. MTW SOURCES AND USES OF FUNDING	53
A. Planned Sources and Uses of MTW Funds in FY 2019.....	53
— Table 10: Estimated Sources of MTW Funding for FY 2019.....	53
— Table 11: Estimated Uses of MTW Funding for FY 2019.....	54
B. Use of Single Fund Flexibility.....	56
C. Local Asset Management Plan (LAMP).....	57
VI. ADMINISTRATIVE.....	58
A. Resolution	58
B. Public Review Process	58
C. Evaluations	58
D. Annual Statement/Performance and Evaluation Report	58

I. Introduction and Overview

This Moving to Work (MTW) Annual Plan provides information on the initiatives and strategies to be undertaken by the Housing Authority of Baltimore City (HABC) under the Moving to Work Demonstration Program (MTW) in Fiscal Year 2019. By letter dated May 11, 2018 HUD approved HABC's request to change its fiscal year end from June 30th to December 31st. The request was made in order to allow HABC to align its State and Federal programs and more efficiently manage accounting and reporting requirements. As such HABC's fiscal year 2019 will be extended to a period of 18 months commencing July 1, 2018, through Fiscal Year End December 31, 2019, effective July 1, 2018.

HABC has been a participant in the MTW program since 2005. The current MTW Agreement between HABC and the US Department of Housing and Urban Development (HUD), which defines the terms and conditions of HABC's participation including the Annual Plan requirements, extends through June 30, 2028.

It is important to note that HABC receives the majority of its funding from HUD, which generally determines funding on a calendar year basis. As of the publication date of this MTW Annual Plan, HABC has not received notification of projected HUD funding amounts for either calendar years 2018 or 2019. In view of the uncertainty regarding available funding, the planned activities detailed in the MTW Annual Plan are subject to modification based on final funding levels.

A. Background on the Moving To Work Demonstration

MTW is a demonstration program authorized by Congress, which provides HABC and the current thirty-nine (39) other participating Public Housing Authorities (PHAs) with both funding and programmatic flexibility, subject to approval by HUD in the MTW Annual Plan process. MTW designation provides HABC with the ability to test and implement locally-determined solutions that address Baltimore City's housing problems and priorities. MTW funding flexibility includes the establishment of a flexible MTW Block Grant, which allows HABC's three primary revenue sources (HUD Public Housing Operating Subsidy, Capital Fund and Section 8 Housing Assistance Payments) to be used interchangeably for any authorized purpose as specified in the MTW Agreement.

MTW programmatic flexibility allows HABC to waive certain HUD regulations and statutory provisions of the US Housing Act of 1937 to promote one or more of the following MTW statutory objectives:

- 1) Reduce cost and achieve greater cost effectiveness in Federal expenditures;
- 2) Provide 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.

For purposes of this Annual Plan, an “MTW activity” is defined as any activity that requires MTW flexibility to waive statutory or regulatory requirements. The MTW activities to be undertaken by HABC in Fiscal Year 2019 are all designed to promote one or more of the MTW statutory objectives.

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

B. MTW Long-Term Goals and Objectives

Led by new Executive Director, Janet Abrahams, HABC is undergoing a series of major planning initiatives including an agency-wide organizational review, portfolio assessment and strategic planning process that are expected to be completed by early part of Fiscal Year 2019. The focus of these efforts is to identify plans, strategies and opportunities to support HABC’s mission to create and provide quality affordable housing opportunities in sustainable neighborhoods.

Guiding the planning efforts are four broad organizational goals (“the 4 Cs of HABC”):

- *Community* – Improve the housing and quality of life for the people we serve.
- *Customer Service* – Increase efficiency, responsiveness and accountability in the services we provide to our internal and external clients.
- *Collaboration* – Build upon our commitment to strong partnerships with residents, employees, government, nonprofit and business communities.
- *Communication* – Create clear and consistent communication.

A key component of the planning process involves a review of MTW activities to date, and an exploration of new opportunities to utilize MTW funding and programmatic flexibility over the long-term to address the enormous funding and operational challenges facing HABC including, but not limited to:

- After factoring in the ongoing conversion of 3,754 (see table on pages 11-12) public housing units to Project Based Rental Assistance (PBRA) under the Rental Assistance Demonstration (RAD) program, HABC will have a remaining portfolio of approximately 7,600 public units under management with an estimated backlog of hundreds of millions of dollars in unfunded capital needs. Many of these housing units, which include both multifamily developments and scattered sites, are obsolete from a design standpoint, and essentially require complete redevelopment. Identifying strategies to leverage limited MTW funding to address both urgent near term capital needs and comprehensive redevelopment needs, including the potential expansion of RAD conversion efforts to additional sites, is a major objective of HABC.

- Ongoing reductions to the Public Housing Operating Fund in the context of rising operating costs continue to stress and pose challenges to HABC's ability to provide quality, timely maintenance services to residents and to quickly make-ready vacant units for re-occupancy. These challenges are further exacerbated by existing conditions in aging physical plants, most of which have had inadequate capital investments for decades. Identifying new approaches to streamline the delivery of property management and maintenance services, while improving the timeliness and overall quality of these services, is essential in order to achieve improvements to customer satisfaction. HABC will continue to explore opportunities to utilize MTW programmatic flexibility in support of substantial improvements to property management and maintenance service delivery.
- HABC's public housing communities, and Baltimore City as a whole, continues to wrestle with high crime rates that disproportionately impact low-income families, seniors and people with disabilities. A key component of HABC's overall planning process involves a review and assessment of current safety and security policies and procedures, and the potential to use MTW flexibility to strengthen existing efforts, support enhanced partnerships with the Baltimore Police Department and other local law enforcement agencies, and involve residents more directly in public safety planning and implementation efforts.
- HABC currently provides housing subsidies to over 18,000 households, either directly through the Leased Housing Division or, indirectly, through pass-through funding to the Baltimore Regional Housing Partnership. Funding remains inadequate, rental costs continue to rise, and HCV participants find themselves competing with market-rate tenants for fewer and fewer quality units at higher rents. In addition to supporting efforts to revitalize neighborhoods and increase participants housing choices, MTW flexibility opens up the potential to design new service-oriented partnerships and/or alternative housing subsidy models.
- HABC's residents (including public housing residents and voucher participants) include some of Baltimore City's poorest and neediest citizens. HABC operates many programs designed to assist residents in addressing their individual and family challenges including job readiness, family self-sufficiency, youth development and other activities. The planning process is reviewing the effectiveness and outcomes of these initiatives, while focusing on identifying opportunities to involve new partners and leverage new philanthropic, government and private funding to expand services and opportunities to HABC residents.
- Recently, two major organizational developments have occurred which require the comprehensive redesign of HABC's organizational structure and service delivery processes. The first major development involves the ongoing conversion of over 3,754 public housing units to project-based rental assistance under the RAD program. While HABC will continue to play a role in admissions, transfers and compliance monitoring for these developments – and HABC's affiliates will have an ownership interest in each property - all property management, maintenance and financial operations will be administered by third party entities. The second major change is the decision by Mayor

Catherine Pugh to separate Baltimore Housing into two distinct agencies, HABC and the Department of Housing and Community Development (DHCD). The separation of the agencies will result in additional costs to HABC. Whereas the two agencies previously operated under a single Housing Commissioner and the Baltimore Housing organizational umbrella, each agency now has its own executive team and, ultimately, will have separate organizational infrastructures. Taken together, these two developments represent a sea change in HABC's structure and scope. As part of the planning initiative, HABC is exploring ways that MTW flexibility can help to streamline policies and procedures and enhance HABC's ability to deliver services in the most cost-effective manner.

C. MTW Goals and Objectives for Fiscal Year 2019

In addition to completing the organizational review, portfolio assessment and strategic planning process activities noted above, HABC's major goals and objectives for Fiscal Year 2019 include the following. All of these activities utilize MTW Block Grant and/or programmatic flexibility:

Public Housing Occupancy – HABC projects that it will achieve a 97% adjusted occupancy rate¹ in its public housing developments.

Voucher Utilization – HABC projects that, on average, it will have 18,622 units under lease each month including Thompson and all other programs.

Project Based Voucher Utilization – HABC projects that 2,240 housing units will be under contract in the Project Based Voucher (PBV) program by the end of FY2019, including 297 units at 12 new developments that will be placed under contract during the fiscal year.

Capital Program – HABC will implement capital improvements at existing housing developments and scattered sites using MTW Block Grant funds (see the chart on pages 16-18). In FY 2019, HABC projects that it will expend approximately \$46.1 million on capital projects as further described below.

Development Program – HABC will undertake development activities designed to support the revitalization of Baltimore neighborhoods and replace distressed and obsolete public housing developments, including the planned acquisition of up to 100 Hollander Ridge replacement units. As of the date of publication, HABC had acquired 20 of these units.

Rental Assistance Demonstration Program – Under the RAD program, HABC has secured HUD approval to convert over 3,754 public housing units to project-based assistance. Conversion through RAD generates new capital resources, preserves existing affordable

¹ The adjusted occupancy rate reflects the percentage of units that are available for occupancy that are actually occupied and excludes 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

housing resources, ensures long-term affordability and improves the quality of life for residents. As noted in prior Annual Plans, HABC projects that the RAD process will provide access to over \$350 million in private equity and other new funds through the Low Income Housing Tax Credit (LIHTC) program. While each converted development has a new ownership structure including a new management and maintenance team, HABC will continue to have an ownership role (through its affiliates) and ongoing roles related to admissions, transfers and compliance monitoring. In FY 2019, HABC will continue the conversion process. Finally, HABC, subject to approval by the Board of Commissioners, may elect to apply to HUD for RAD conversion commitments at additional public housing sites. HABC will consult with local and citywide resident organizations prior to submission of future RAD applications.

Resident Services – HABC plans to serve its public housing residents through a wide array of self-sufficiency, personal development and supportive service program offerings (Please see Appendix K).

Proposed MTW Activities – HABC is proposing three new MTW activities in FY 2019 – Rent Simplification, Project-Based Voucher Amendments to the HAP Contract, and Local Fair Market Rent. Under Rent Simplification HABC will further simplify certain income calculations and fully exclude full-time student income. This activity improves economic self-sufficiency and administrative efficiency. Amendments to the Project-Based Voucher HAP Contract would require the Owner to maintain designation for targeted populations for the term of the PBV HAP contract. In the event the Owner fails to lease a designated unit to an approved applicant, such failure will be considered a default under the PBV HAP Contract. If the default is not cured within a reasonable time, HABC can remove the unit from the HAP Contract, or recapture the amount of HAP paid for the period of time the tenant was occupying such unit in violation of the terms of the PBV HAP Contract. Implementing the Local Fair Market Rent activity, will allow HABC to use the 50th percentile Fair Market Rent to calculate payment standards. Using the 50th percentile FMR as the baseline for payment standards provides greater housing choice for low-income families.

Homelessness Prevention Initiatives - The 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, Homeless Services Program (MOHS/HSP). Participants use their vouchers to find affordable permanent housing while receiving supportive services from MOHS and other agencies. In July 2014, the amount of vouchers available to chronically homeless individuals and families increased from 500 to 650 vouchers. The number increased again in October 2015 to 750 vouchers, and a final increase took place in December 2015 resulting in a total of 850 vouchers set aside for chronically homeless households.

The Homeless and Veterans Set Asides – HABC has set aside 200 vouchers for the rolling Request for Proposals of Project-Based units designated to house the homeless. Out of these 200, 192 vouchers have been awarded. Another 200 vouchers have been set-aside for the Request for Proposals of Project-Based units designated to house homeless veterans and their families. Out of this request, 182 vouchers have been awarded.

The 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, Homeless Services Program (MOHS/HSP). MTW Authority is not required for this initiative.

Analysis of Impediments to Fair Housing - HABC will be participating in a Baltimore regional analysis of impediments to fair housing (“AI”) as evidenced by a Memorandum of Understanding to Develop a 2019 Regional AI that became effective on June 27, 2018. The Regional AI is being coordinated by the Baltimore Metropolitan Council.

Approved MTW Activities – HABC will continue to implement an array of previously approved MTW activities that impact the Public Housing and Leased Housing programs, including those related to the Thompson and Bailey cases, as further described in Section IV of the Annual Plan.

Notes on Thompson and Bailey Settlements

There are two long-standing legal cases that have a significant impact on HABC's MTW activities and initiatives:

1. 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 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 in 1996 through a Partial Consent Decree. In November 2012, a Final Thompson Settlement Agreement was approved by the Court that 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 Partial Consent Decree ("Thompson PCD-Leased Vouchers"). The Settlement Agreement also provides for the continuation of the Thompson Homeownership Voucher Program. The Baltimore Regional Housing Partnership (BRHP) administers the vouchers for the Thompson Remedial and Partial Consent Decree vouchers. MTW flexibility continues to be utilized to support Thompson activities, and is referenced accordingly in the MTW Annual Plan.
2. The *Bailey Consent Decree* resolved a lawsuit brought on behalf of persons with disabilities who are current or former residents of or applicants for HABC's housing programs. Among other requirements, the Bailey Consent Decree requires HABC to create and have certified 756 housing units that meet the Uniform Federal Accessibility Standards (UFAS) and to create 600 units for non-elderly persons with disabilities. Information on HABC's obligations under Bailey and the use of MTW flexibility to address these obligations is incorporated into the remaining chapters of the Annual Plan

II. General Housing Authority Operating Information

This section of the Annual Plan provides information on HABC’s current and planned inventory, projected leasing activities and waiting lists for both the Public Housing and HCV programs. It includes details on planned public housing capital expenditures and changes to the housing stock as a result of new development, demolition and disposition efforts and conversion of public housing units to long-term project-based assistance under the Rental Assistance Demonstration program.

A. Planned New Public Housing Units

As shown on Table 1, HABC plans to add 90 replacement units to the public housing inventory in FY 2019 including:

- Pursuant to the Thompson Settlement Agreement, an additional 57 scattered sites units will be acquired during fiscal year 2019 as part of the revised Hollander Ridge Revitalization Plan which requires HABC to acquire up to 100 scattered sites units. HABC has already acquired 42 of the 100 units to meet its obligations under the Agreement.
- Pursuant to the Bailey Supplemental Decree, HABC plans to acquire 10 units for non-elderly persons with disabilities. One of the 10 units will be fully accessible. All 10 units will be designated for non-elderly persons with a disability in neighborhoods identified in the Bailey Supplemental Decree.

Table 1: Planned New Public Housing Units in FY 2019

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	0	20	26	27	7	0	0	80 ²	General population	5	0
MD002/TBD Bailey Supplemental Decree		10						10	For persons with a disability.	1	0

Total Public Housing Units to be Added: 90

B. Planned Demolition or Disposition of Public Housing Units

² To date HABC has purchased 42 of the Hollander Ridge Replacement units

As shown on Table 2, HABC plans to demolish and/or dispose of 1,392 units in FY 2019 including:

- 753 units at five developments that will be converted from public housing project-based rental assistance under the RAD program;
- 433 non-viable scattered site units which were previously listed in the FY 2018 MTW Annual Plan will be disposed of to the City of Baltimore;

8.64 acres of vacant land (the former site of Somerset Homes) will be sold to the development entity PSO Housing Company, LLC for the Perkins-Somerset-Oldtown Transformation Plan.

- 132 units at Gilmor Homes will be demolished as part of HABC’s efforts to improve safety and habitability at the site; and,
- 74 vacant units at O’Donnell Heights will be demolished.

HABC also plans to dispose of 8.64 acres of vacant land which was the public housing site known as Somerset Homes that was demolished in 2009 and 6 lots at O’Donnell Heights which will be sold to a developer to build for-sale housing.

In FY 2019, HABC will complete 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.

Table 2: Planned Public Housing Units/Lots to Be Removed in FY 2019

PIC Dev.#/AMP and PIC Dev. Name	Number of Units to be Removed	Explanation for Removal
MD002/Various Scattered Sites Units	433	Obsolete, non-viable scattered site units
MD002/0103 Midtown Scattered Sites	23	Obsolete, non-viable scattered site units
MD002/0108 Upton Scattered Sites	23	Obsolete, non-viable scattered site units
MD002/0109 Stricker Scattered Sites	21	Obsolete, non-viable scattered site units
MD002/0006 Gilmor Homes	132	Obsolete, non-viable conventional units
MD002/0009 O’Donnell Heights	-	6 lots to be sold to developer to build for-sale housing. A plan to dispose of these lots was noted in the FY 2017 Annual Plan; however, HABC will submit a disposition application to HUD in FY 2018.
MD002/0009 O’Donnell Heights	74	HUD approval received, and demolition will occur in FY 2019.
MD002/0042 Somerset Extension	60	RAD conversion
MD/002/0010 Somerset Homes	-	8.64 acres of vacant land
MD002/0070 Rosemont Towers	203	RAD conversion

PIC Dev.#/AMP and PIC Dev. Name	Number of Units to be Removed	Explanation for Removal
MD002/0041 J. Van Story Branch	357	RAD conversion
MD002/0111 Heritage Crossing	75	RAD conversion
MD002/0118 Homes for Arundel	58	RAD Conversion
Total Number of Units to be Removed	1,459	

C. Planned New Housing Choice Vouchers to be Project-Based

HABC plans to enter into Housing Assistance Payments Contracts for 297 units at 12 new project-based developments in FY 2019, as shown in Table 3. Note that public housing units to be converted to Project Based Rental Assistance (PBRA) under the RAD program are listed on a separate table below.

Table 3: New Housing Choice Vouchers to be Project-Based in FY 2019

Property Name	Anticipated # of New Vouchers to be Project-Based	Description of Project
Somerset Homes–Phase I	50	Public housing replacement units as part of the Perkins Somerset Old Town Transformation Plan.
Mount Winans/AHG	65	New construction on land owned by City for veterans housing.
Somerset Extension	7	These 7 PBV units will be designated for non-elderly persons with disabilities. Part of redevelopment of Somerset Extension, which will include 58 additional RAD units.
Metro at Mondawmin	18	Part of a proposed 70-unit affordable rental development to be developed by Enterprise Housing Corporation in the Liberty Square neighborhood of West Baltimore. Of the 18 PBV units, 11 will be designated for non-elderly disabled and 7 for a homeless preference.
New Shiloh	19	Part of a 73-unit affordable development to be developed by Bon Secour’s Unity Properties, New Shiloh CDC and development consultant, Enterprise Homes. Of the 19 PBV units, 11 will be designated for non-elderly disabled and 8 for a homeless preference.
North Avenue Gateway II	10	Part of a 65-unit family development located on the 300 block of West North Avenue. Of the 16 PBV units, 10 will be designated for non-elderly disabled.
L on Liberty	14	Part of a 71-unit development located at Park Avenue and Liberty Street.
Paca House	82	Proposed new construction for veterans to be developed on North Paca Street by Somerset Development Company. Sixty-three (63) units will be reserved for veterans and 19 will be for homeless families.
Marian House	6	Homeless housing.
Greenmount & Chase	15	Part of a 60-unit mixed-income development located on the 700 block of East Chase Street. Of the 15 PBV units, 9 will be designated for non-elderly disabled and 6 for a homeless preference.
Walbrook Mills	11	Site located at 2636 Walbrook Avenue to be developed by Osprey Property Company and Coppin Heights CDC.

Anticipated Total New Vouchers to be

297

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

2,240

Project-Based

the Fiscal Year

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

2,115

D. Rental Assistance Demonstration Program

As noted in prior Annual Plans, HABC is in the process of converting a significant portion of its public housing portfolio to long-term Project Based Rental Assistance (PBRA) under the Rental Assistance Demonstration (RAD) program. Through RAD conversions, HABC projects that an additional \$350 million in new capital resources will be made available to improve living conditions and ensure long-term affordability at the converted developments. To date, HABC has received approval from HUD to convert 18 public housing sites and seven (7) privately-owned sites with ACC units under RAD. 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 ultimately intended for conversion to PBRA under RAD.

To maximize the positive impact of RAD conversions, while ensuring the protection of tenant rights and long-term affordability, converted public housing developments are sold to private ownership entities in which an HABC affiliate retains an ownership interest. HABC's development affiliate retains 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.

As noted in prior MTW Annual Plans, in addition to tenant protections required under RAD, as part of the RAD conversion process, HABC utilized its MTW authority to obtain a waiver from HUD to apply its Long Term Affordability (LTA) criteria to the RAD units.

Table 4 provides a list of public housing developments that have already undergone, or are planned for RAD PBRA conversions. In addition to the Table 4 listed developments, there are 265 additional units at two third party-owned developments (Townes at the Terraces and Arbor Oaks) which are planned for RAD conversion, but which may not close due to financing issues.

Table 4: Planned and Completed RAD Conversions

Development Name	Units	Conversion Date	Construction Completion
Allendale	164	11/15	02/17
BE Mason	223	11/15	08/17
Bel Park Tower	253	11/15	05/17
Brentwood	150	12/15	04/17
Broadway Overlook	84	08/17	12/18
Chase House	189	12/16	01/18

Development Name	Units	Conversion Date	Construction Completion
Ellerslie	117	02/17	05/18
Govans Manor	191	11/16	11/17
Heritage Crossing	75	Q1 FY19	
Hillside Park	30	12/17	12/18
Hollins House	130	11/15	05/17
J. Van Story Branch	357*	Q2 FY19	
Lakeview	302	11/15	09/17
McCulloh Extension	347	11/16	08/18
Monument East	170	10/18	12/19
Primrose Place	125	02/16	04/17
Pleasant View Gardens Senior	110	09/16	08/17
Pleasant View Gardens Townhomes	201	07/16	08/17
Rosemont Tower	203	Q2 FY19	
Scattered Sites – Thompson 58	58	Q1 FY19	
Senior Townes at the Terraces	47	11/17	01/19
Somerset Extension	60*	Q2 FY19	
Wyman House	168	12/15	07/17
TOTAL	3,754		

*After redevelopment, the J. Van Story Branch unit count will be reduced from 357 to 350 to accommodate an additional elevator. Seventeen units will be eliminated to accommodate a new elevator shaft. Three of the replacement units will be provided in a Low Income Housing Tax Credit project in Downtown Baltimore and 10 new units will be created on the top floor of J. Van Story Branch. After development of Somerset Extension, the site will have 65 units, of which 58 will be RAD and 7 (designated for non-elderly persons with a disability) will be subsidized by HABC under the PBV program.

E. Other Planned Changes to Housing Stock

HABC has included an update to the Asset Management Table in Appendix B that describes the current status of each public housing site; outlines certain funding and development opportunities and risk factors that will be monitored over the life of the MTW Demonstration; and, describes possible outcomes and development activities. The Asset Management Table identifies 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. Properties approved for RAD Phases I and II are identified in the Asset Management Table.

HABC has completed Green Physical Needs Assessments (GPNA) of its inventory. All needs identified in the GPNA are considered as a Capital Need and are eligible for Capital funding.

See also narrative discussions below under Capital Program and Development Initiatives.

F. Capital Program Activities

HABC will implement a wide range of capital investments at existing public housing sites and continue its program of citywide housing development activities as summarized on Table 6. Additional discussion of capital plan, energy, infrastructure and extraordinary maintenance issues and initiatives is included below. As summarized in Table 5, HABC projects it will expend a total of approximately \$46.1 million on capital-related activities in FY 2019. Actual projects, timetables and expenditures may vary. HABC may modify its planned capital expenditures during the Plan year based on changing priorities, emergency conditions and other factors.

Pursuant to the MTW Agreement, 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.

Table 5: Planned Capital Fund Expenditures in FY 2019DA

AMP No.	Development Name	Description of Work	FY 2019 Planned Expenditures
1	Latrobe Homes	Replace Window and Door Caulking, Waterproofing & Tuck-pointing	849,000
2	McCulloh Homes	Site Work Improvements, Renovate Maintenance Work Space (Renovate Basement and Crawl Space Area), Install LED Lighting, Replace Steam Generator Tanks, Install Ground Source Heat Pumps, Replace Steam Condensate Sets, and Replace Natural Gas Piping Systems & Pipe Hangers	1,964,326
3	Perkins Homes	Emergency Repairs, and Development Consultant	140,949
4	Poe Homes	Site Work and Unit Improvements	478,773
5	Douglass Homes	Upgrade Electrical Distribution System, Replace Domestic Hot Water System, and Repair Traps for Radiator Control Valves	4,025,127
6	Gilmor Homes	Demolition of 132 Walk Up Units, Install New Keytrak System, Install Domestic Hot Water Generators, Install Additional Lighting and Cameras, and Relocation Activities	3,656,777
9	O'Donnell Heights	Emergency Repairs (Windows, Heating, Site Work, etc.), Demolition of 74 Units, Install Temporary Play Area and Repair Basketball Court	550,000
11	Cherry Hill	Install New Windows and Screens at Development 2-11, Investigate Sink Hole and Underground Leaks, Gas Piping Survey and Mapping, Install HVAC Controls in Daycare	1,980,000
21	Brooklyn Homes	Repairs to HABC Owned Alleys and Roads, Install New Playground and Site Work Improvements	325,000
22	Mt. Winans/ Westport	Repair Community Room Floor, Install New Playground, Site Work Improvements, Install Sub-meters	129,467
31	Dukeland/ Rosemont	Replace Exterior Doors, Replace HVAC - Gas Furnaces, Repair Natural Gas Piping Systems	1,681,975
41	J Van Story Branch	Elevator Modernization	709,148
42	Somerset Court Extension	RAD Conversion Improvements	3,960,889
45	Hollander Ridge	Replacement Housing – up to 100 Units	8,669,002
122	NEDs	Incentives for Non-Elderly Disabled Units	402,138
200, 201, 202, 203 (including Laurens House, Carey House, Shipley Hills and Oswego Mall)	Scattered Sites	Repair Roofs, Basement Waterproofing, Replace Gas Fired Furnaces and Water Heaters, Replace Windows, Renovate Long Term Vacant Units in Stable Neighborhoods, Replace Gas Fired Water Heaters, Repair HVAC - Fan Coils, Conduct Viability Assessments of Inventory, Relocation Activities	1,673,699
AHI	AHI	Affordable Home Ownership (BRHP)	2,000,000

AMP No.	Development Name	Description of Work	FY 2019 Planned Expenditures
Various	Perkins Homes; Douglass Homes; Poe Homes; Dukeland; Rosemont; Oswego Mall; McCulloh Homes (Low Rise); McCulloh Homes Townhomes; Laurens House; Mt. Winans; Spencer Gardens; Carey House	Replace failing Infrastructure Projects, Replace Set-Point Thermostats/ Thermostatic Radiator Control Valves, Install Electric Sub meters, Install Efficient Lighting in Units and Common Areas, Install Low Flow Faucet Aerators in Units and Common Areas	3,933,357
Various	J. Van Story Branch (West Twenty), Somerset Extension, Monument East, Rosemont Towers	RAD Subsidy	500,912
Various	Latrobe, Poe Homes, Gilmor Homes, Cherry Hill Homes, Brooklyn Homes, Westport/ Mt. Winans	Sub Metering Maintenance and Service	30,000
AMPS	Authority-Wide	Improvements to Non-Dwelling Management and Maintenance Work Spaces	190,000
AMPs	Authority-Wide	Replace Kitchens, Baths, Windows, Electrical Systems, Mechanical Systems, and Vacancy Renovation	379,668
AMPs	Authority-Wide	A & E and Environmental Consulting Fees	195,000
AMPs	Authority-Wide	Legal, Planning, Information Technology and Utility Consulting Fees, etc.	646,000
Central Office	Central Office	Technical Salaries and Benefits	1,260,002
Central Office	Central Office	Non-Technical Salaries and Benefits	1,668,954
Central Office	Central Office	Resident Meetings and Training	14,150
Central Office	Central Office	Admin and Operating Costs, Overhead, Sundry and Audit Fees	386,400
Central Office	Central Office	Debt Service-1st Phase EPC	3,700,716
		GRAND TOTAL	\$ 46,101,430

504 Accessibility Improvements

In FY 2019, 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.

As of December 31, 2017, 758 of 756 UFAS units had been created and certified under the Bailey Consent Decree. However, the number of one-bedroom and two-bedroom UFAS units exceeds the number required by the Bailey Decree, as amended and there is a shortage of three three-bedroom UFAS units. HABC plans to create these UFAS units through Baltimore City

LIHTC projects and these UFAS units will exceed the 5% UFAS unit requirement for each LIHTC project.

An additional four three-bedroom units that are compliant with the Uniform Federal Accessibility Standards will also need to be created due to HABC's plan for the demolition of 132 of the 548 units at Gilmore Homes. HABC is doing preliminary planning and, through this process, will determine where the additional four three-bedroom UFAS units will be located. HABC may use Capital funds to create these UFAS units.

Infrastructure and Extraordinary Maintenance

In FY 2019, 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.); (ii) perform major renovations at various developments and a portion of the scattered site inventory to further reduce vacancies; and (iii) repair/replace 504 ramps. In addition, in FY 2019 HABC may continue to: (i) study the conditions of its scattered sites portfolio to determine long range planning goals; (ii) investigate and repair drainage and erosion problems at various sites; address trip hazards; and (iii) implement its environmental program that includes the continued testing for lead based paint and abatement of asbestos as required

HABC will continue its program of capital improvements using a prioritized needs list based upon available funding. Major initiatives planned in FY 2018 to be completed in FY 2019 are the demolition of 74 units and the daycare center at O'Donnell Heights with the assistance of state demolition grant funding; playground replacement and refurbishment through HABC's partnership with KABOOM playground specialists; and, the demolition of 132 units at Gilmore Homes.

Additionally, major project work still underway to be completed in FY 2019 includes the replacement of roofs at various scattered sites; the upgrade of the electrical distribution system at Douglass Homes; the modernization of the two residential and one maintenance elevators at J Van Story Branch; lease hold improvement at the Benton Building and at 709 E Eager St (including designing and constructing a parking lot for employees and program participants) due to staffing and reorganization efforts.

Major work in FY 2019 may include: vacant unit renovations, and renovations at Latrobe, McCulloh, Perkins, Douglas, Gilmore, Cherry Hill, Westport, Brooklyn and Rosemont and various scattered sites. Other related work to be completed will be painting, interior units, construction and finishes as well as kitchen and bathroom upgrades at these HABC family and targeted scattered sites. Windows are an ongoing capital constraint for the agency. However, HABC plans the replacement of windows and re-caulking of windows at developments as well as some security screens for windows as identified. There will also be a focus on basement water proofing in various scattered sites units as needed. As part of the Green Physical Needs Assessments, HABC has completed a needs assessment for the scattered site inventory. HABC will assess the viability of each unit based on condition, neighborhood, typology, and redevelopment opportunities, including affordable homeownership, RAD, mixed financed, etc.

Decisions will be made to keep the units in HABC's inventory or dispose of them for one of the opportunities previously mentioned.

In general, HABC will conduct environmental, electrical, mechanical and architectural studies for aged infrastructure and developments. In FY 2019, HABC will plan for 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.

HABC will assess foundation construction to address water infiltration, flooding and run off at various developments as needed such as Brooklyn Homes, Latrobe Homes, McCulloh Homes, Perkins Homes, Poe Homes, Douglass Homes, Gilmor Homes, Cherry Hill Homes, Westport Homes, Rosemont Homes, Dukeland Homes, and Spencer Gardens. The agency will address the replacement of water, sewer, and sanitary lines at any developments as the need is identified.

Ongoing major system needs are distribution piping systems along with boiler room upgrades and heating/energy management systems assessment/replacement at all sites. Heating systems at family developments are undergoing boiler room and heating/hot water distribution system overhauls and/or efficiency upgrades as needed. This will also include replacement and /or upgrades to the Energy Management Control System (EMCS) as various developments.

HABC's environmental program will continue with efforts that include testing for lead based paint and abatement of asbestos as required. HABC will maintain compliance with EPA requirements for training and certification. HABC, along with various consultants and regulatory guidance, has created routine gas, lead, UST, mold, asbestos as well as training updates and monitoring; gas piping replacement projects and mapping at various locations. As part of the monitoring and compliance obligations HABC will address gas piping projects and mapping at various locations as needed. HABC will continue its testing for lead based paint, the abatement of asbestos as required and will continue to respond to all other environmental concerns.

HABC is committed to continuing work on the investigation and repair of drainage and site erosion problems at various sites to include installing and/or repairing fencing as needed. Tree maintenance, remediation and trimming will be performed as needed.

Special Construction and Demolition/Disposition of Public Housing Units

HABC received HUD approval for the demolition of 74 units and a defunct daycare facility at O'Donnell Heights. Approximately \$1.05 million in state funds (Project C.O.R.E.) were awarded to HABC for this activity. In addition to the demolition of the 74 units and the daycare facility, HABC will fund the creation of a playfield and refurbish a basketball court for this community.

HABC also received HUD approval to demolish 132 "walk-up" units at Gilmor Homes. The portion of the site proposed for demolition is the location of a significant amount of criminal and

drug activity. Steps taken to curtail this activity, which include replacing lights, replacing locks, installing secure doors and the strategic use of cameras, have not been successful.

The estimated cost of required improvements in the walk-up units is \$15.6 million. The \$15.6 million represents replacing existing equipment in kind and does not fully address upgrades, redesign and modernization, especially as it relates to security enhancements. The removal of these buildings will open up the 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.

HABC's Capital Fund, is totally inadequate to address the unmet and accrued needs of its inventory at Gilmore Homes and elsewhere. HABC receives approximately \$1,300 per unit annually to address capital needs in properties that were built in the 1940's with failing infrastructures. Due to the foregoing, HABC will submit a disposition application to HUD in FY 2018 for the partial demolition of 132 units in Gilmore Homes' walk-up buildings. Actual demolition will occur in FY 2019. The application includes plans to re-route the existing utilities to maintain service to the surrounding buildings remaining on the property as well as plans to relocate and demolish the six walk up style apartment buildings. The estimated cost to reroute and demolish the buildings is \$4.0 million, and the work will take 12 to 15 months. The expected timing for the issuance of the notice to proceed is in the second quarter of FY 2019.

Energy Performance Contracting & Resident Billing / Metering

HABC will continue monitoring, measurement and verification efforts for the Phase I Energy Performance Contracting (EPC) properties (Latrobe, Cherry Hill, Gilmore, Westport and Brooklyn). A second EPC Program of approximately \$11 million has been planned for the installation of conservation measures including lighting, water conservation fixtures, utility metering and system upgrades at selected properties (Douglass Homes, Poe Homes, Dukeland Homes, Rosemont Homes, Oswego Mall, McCulloh Homes Low Rise, McCulloh Homes Townhomes (122), Laurens House, Mt Winans, Spencer Gardens, and Carey House). The second EPC is planned for a total of 15 years, inclusive of two years of construction and ECM installation. Once the EPC financing is established and executed in the last half of FY 2018, design, construction and ECM installation should commence in the first quarter of FY 2019. As a part of the EPC strategic plan, HABC re-negotiated Veolia steam contracts for service to Douglass Homes and Cherry Hill Homes. The new rates for these sites will be implemented by the end of FY 2018.

Exterior lighting at various sites will be evaluated. The work will include major equipment replacement at McCulloh Homes and Douglass Homes and the installation of additional energy conservation measures at the remaining named sites.

The Energy Department addresses and manages the Resident Billing & Metering Program. HABC solicited and contracted with a third party utility billing company to handle resident excessive consumption charges in early FY 2018. The company will continue the efforts with the properties in the first EPC and absorb the Phase II EPC properties once the sub-metering infrastructure is in place. HABC's Energy Department will oversee this company in close

collaboration with other agency departments. Additionally, the Energy Department will ensure all Utility Allowances & Excessive Consumption Charges (ECC) updates are performed for the developments under the EPC program. Section 8 Utility Allowances will also be reviewed and updated.

Energy Information Kiosks remain in operation at three locations: Benton Building, Latrobe and Cherry Hill Homes. Residents also have access to the Energy Hotline and Energy email for residents to communicate questions, issues and concerns to a central location.

Partnerships

Playgrounds remain a priority and will be addressed through the Capital Plan and in collaboration with KABOOM, a nationally recognized playground specialist. HABC collaborates continuously with Baltimore Gas & Electric to identify the list of properties, which are mostly scattered sites, for meter upgrade/removal/inspection or maintenance or theft of energy cases. HABC will continue to evaluate and/or propose projects with various partners including the Weatherization Assistance Program and the Parks & People Foundation.

Safety & Security Initiatives

In 2006 the City established “Citiwatch”, a program between the Mayor’s Office of Criminal Justice (MOCJ), the Mayor’s Office of Information & Technology (MOIT) and the Baltimore Police Department (BPD) Homeland Security Division to provide state-of-the-art CCTV cameras throughout the City of Baltimore to assist police and other governmental agencies with public safety. Pursuant to an intergovernmental agreement, HABC established a partnership with the City in 2014 for the City to install, repair, maintain and replace HABC’s closed circuit cameras or similar communication devices located at certain HABC developments.

HABC continues its partnership with MOCJ, MOIT and BPD-Homeland Security Division. Through this collaboration HABC performs ongoing reviews for the useful life and operation of camera equipment and gunshot technology at Cherry Hill, Gilmor, Latrobe, McCulloh, Perkins and Poe Homes. Camera maintenance, safety and security concerns, and safety grants are some of the work performed as a result of these partnerships. The maintenance agreement for 173 cameras at 6 original locations (Gilmor, Latrobe, McCulloh, Perkins, Cherry Hill and Poe Homes) was extended through June 2019. The agreement for Pleasant View Gardens was transferred to the developer during the RAD conversion of the property.

This partnership also seeks opportunities to apply for private and governmental grants for the implementation of new cameras and security lighting at all sites. The Department of Housing Safety and Security Grant awarded to HABC for Brooklyn Homes will commence in FY 2018 and be completed in FY 2019 under this partnership. The grant will cover the installation of at least six cameras, security lighting and some fiber optic cable installation. The work includes installations to key areas around Brooklyn Homes as part of the crime fighting and deterrent strategy. Fiber installations are being evaluated for possible implementation at all sites to increase data connectivity/reliability and camera operations.

Facilities & Real Estate

The Living Classrooms Foundation now occupies the Youth Development Center at Pleasant View Gardens under a lease with HABC and provides development activities and early childhood services to youth.

HABC will assess and prepare to renovate key HABC Maintenance Facilities across the various developments. The renovation of the old daycare center at Latrobe Homes is planned as a new facility and maintenance storage space for the onsite maintenance staff. HABC will oversee and/or negotiate cell phone tower leases as needed. There is ongoing management of leased space at Benton Building and the West Pratt Street or Mount Clare Junction facilities. HABC leases the space at Duncanwood, and will oversee any major changes or upgrades to the archive system as well as a disaster recovery/emergency response system at this location.

HABC is also reviewing the renovation and/or development of community buildings at Westport Homes and Brooklyn Homes.

A. DEVELOPMENT INITIATIVES

HABC utilizes MTW Block Grant and other public and private leveraged funds to support the preservation and revitalization of existing public housing communities, and the development of new affordable units. A summary of non-RAD activities and other major ongoing and planned development initiatives follows. The discussion of planned unit counts, timetables, development financing and other details is preliminary and subject to change.

In addition to the projects noted below, HABC is considering development of a number of other sites including sites that may be identified through the previously noted Strategic Planning process. Activities on these sites in FY 2019 may 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.

O'Donnell Heights

The O'Donnell Heights public housing development was constructed in 1942 and included 900 public housing units. Of the original unit count, 596 have been demolished and 304 remain on-line. The redevelopment of O'Donnell Heights is proceeding in phases. Phase I-A, consisting of 75 affordable rental units and 1 managers unit, is now complete. Phase I-B, consisting of 68 affordable units, is expected to be completed by April 2018. HABC will provide 34 project-based vouchers. The remaining 34 units will be affordable to households earning less than 60% of the area median.

HABC has received HUD approval to demolish 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 I and II of the redevelopment of O'Donnell Heights were

completed. However, these specific 74 units have continued to show signs of distress and costly repairs, beyond routine maintenance.

HABC has received HUD approval to demolish the non-functioning day care facility, which is beyond repair due to extreme vandalism and is creating unsafe and unsightly conditions for the community and residents. The demolition of these units and the daycare center will help facilitate the continued O'Donnell Heights redevelopment efforts.

O'Donnell Heights does not include any UFAS units. In the redevelopment of O'Donnell Heights as Keys Point, one bedroom LTA units have been created for non-elderly persons with disabilities and the developer created UFAS unit in accordance with applicable laws.

Bailey Supplemental Decree Units

Ten additional units for non-elderly persons with a disability will be created through the acquisition and rehabilitation of units in neighborhoods identified in the Bailey Supplemental Decree. This project is expected to commence in the fall of 2018.

Thompson Settlement Agreement

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-002-1294) 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 2019 Fiscal Year.

Hollander Ridge HOPE VI Project

HABC will acquire and rehabilitate up to 100 scattered site units in Baltimore City as identified in Thompson Settlement Agreement. Once acquired, they will be public housing rental units until HUD approves the conversion to project-based assistance under RAD. At least 5% of the units acquired under the Hollander Ridge Revitalization Plan will meet federal accessibility requirements for wheelchair users, and HABC will also require the developer to make 2% of the Hollander Ridge units hearing/vision compliant. Once the units are acquired and an assessment is completed, HABC will determine which units will be wheelchair accessible.

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 \$7.14 million in "replacement funds" that may be used in conjunction with HOPE VI Funds to develop one or more scattered site projects. Replacement funds may be from any available source except the HOPE VI Funds.

Perkins Somerset and Old Town Transformation Plan

HABC has been awarded a Choice Neighborhoods Initiative (CNI) implementation grant in the first quarter of FY 2019 for Perkins Homes. This redevelopment effort will integrate the Oldtown and Somerset Homes Master Plans with the Perkins Transformation Plan to create a single seamless plan; the Perkins-Somerset-Oldtown Transformation Plan. HABC has submitted a disposition application for the sale of 8.64 acres of vacant land to the development entity PSO Housing Company, LLC and will submit disposition applications for Perkins Homes in several phases.

At Perkins, HABC intends to replace all of the UFAS units that are certified under the Bailey Consent Decree. In addition, the developer will provide a minimum of 5% mobility UFAS units and 2% hearing/vision UFAS unit as per the PSO Choice award, as required by law.

The redevelopment of Somerset Homes is part of the Perkins–Somerset-Old Town Transformation Plan, which is being funded in part by HUD’s award of a Choice Neighborhood Implementation grant to HABC and the City of Baltimore. The Somerset Homes site will be redeveloped in three phases and the overall Somerset development plan includes an additional phase to be completed off-site on an adjacent parcel owned by the Mayor and City Council of Baltimore that will be conveyed to HABC.

HABC will convey the Somerset Homes site in phases to a single purpose entity controlled by Somerset Redevelopment, LLC. A total of 493 rental units will be constructed on the Somerset Homes site, consisting of 239 deeply affordable project-based voucher units, 111 low income housing tax credit units at 60% or less of Area Median Income, and 143 market rate units. The off-site parcel will include an additional 64 units. The redevelopment of Somerset Homes also includes the construction of a new community park and a network of new public streets resulting in a more pedestrian friendly walkable community.

B. Planned Number of Households Served

Table 6 provides information on the households projected to be served by HABC as of the end of FY 2019. Table 6 provides information on MTW units only. All of HABC’s public housing units are considered part of MTW. However, within the Housing Choice Voucher (HCV) program all vouchers administered by HABC or BRHP (*Thompson*) are included except for Special Purpose Vouchers specifically excluded under the MTW Agreement.

Table 6: Planned Number of Households Served at End of FY 2019

	Planned Number of Households to be Served	Planned Number of Unit Months Occupied/Leased
Federal MTW Public Housing Units to be Leased	6,412	76,944
Federal MTW Voucher (HCV) Units to be Utilized*	13,200	158,400
Federal Non-MTW Special Purpose Voucher (FUP & NEDs II) Units to be Utilized w/MTW flexibility	135	1,620
Number of Units to be Occupied/Leased through Local, Non-Traditional, MTW Funded, Property-Based Assistance Programs		
Number of Units to be Occupied/Leased through Local, Non-Traditional, MTW Funded Tenant-Based Assistance Programs (Thompson Vouchers)	4,311	51,732
Total Households Projected to be Served	24,058	288,696

*Includes 328 MTW Bailey and HABC Long-Term Affordable Project-Based Voucher units.

As of December 31, 2017, 8,239 public housing units are under an Annual Contributions Contract (ACC) with HUD, 7,600³ of which are available for occupancy. Occupancy at the end of calendar year 2017 is 7,040, representing an adjusted occupancy rate of 93%.

In FY 2019, due to additional planned RAD conversions (753 units) and the demolition or disposition of non-viable scattered sites (500 units) and conventional public housing (206 units), HABC’s public housing inventory is projected to decrease to 8,069 by July 1, 2018 and to 6,610 by December 31, 2019. HABC projects that 6,412 public housing units will be leased to eligible households as of the end of FY 2019.⁴ It is important to note that the decrease in HABC’s public housing units due to RAD is not a factor used to determine compliance with the statutory requirement that MTW agencies serve substantially the same number of families had they not participated in the MTW demonstration.

Table 7 provides a summary of HABC’s Tenant-based and Project-based MTW Housing Choice Voucher programs including current leasing rates as of June 30, 2018 and projected leasing through December 31, 2019. Also included are non-MTW units under the FUP, NEDs II, VASH, Moderate Rehab, Substantial Rehab and New Construction programs, and HUD Tenant Protection Vouchers. HABC may apply MTW programmatic flexibility to these vouchers under certain circumstances.

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

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

Table 7: Housing Choice Voucher Program FY 2019 Projected Leasing

	Projected Leased as of 6/30/18	Projected Leased as of 12/31/19
MTW Tenant Based Vouchers (Non Consent Decree)	10,058	10,500
MTW Project Based Vouchers (Non Consent Decree)	1,340	1,500
MTW Tenant Based Vouchers – Bailey	798	775
MTW Project Based Vouchers – Bailey	402	425
Sub-Total	12,598	13,200
MTW PCD Vouchers – Thompson	1,642	1,686
MTW Remedial Vouchers – Thompson	2,268	2,590
MTW Homeownership Vouchers - Thompson	35	35
Sub-Total	3,945	4,311
TOTAL MTW VOUCHERS	16,543	17,511
Non-MTW Section 8 Moderate Rehab	216	193
Non-MTW Section 8 New Construction/Substantial Rehab	77	0
Non-MTW Family Unification Program (FUP)	93	97
Non-MTW Non-Elderly & Disabled, Category II (NEDs II)	37	38
Non-MTW VASH Vouchers	428	515
Sub-Total	851	843
TOTAL ALL	17,394	18,354

The total number of Bailey vouchers for NED households receiving assistance under the tenant-based program as of June 30, 2018 is 798. HABC is obligated, under the Bailey Consent Decree, to provide assistance in the equivalent of 850 NED vouchers, which is 102,000 unit months leased by NED participants. Due to a reduction in HCV funding by HUD, HABC stopped issuing vouchers to applicants on the HCV Program waiting list. Therefore, HABC was unable to maintain 850 tenant based vouchers leased to NEDs. However, notwithstanding the reduction in funding, HABC resumed issuing vouchers to NEDs in December 2017, currently has 101,900 unit months leased and anticipates meeting the 102,000 units months leased by the end of September 2018.

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

Under its ACC, HABC expects to provide assistance for approximately 13,350 participants by the end of FY 2019. Providing additional project-based units to comply with the requirements of 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 2018 is an additional contributing factor in determining projected utilization.

C. Reporting Compliance with Statutory MTW Requirements

HABC is in compliance with the MTW statutory requirements.

D. Anticipated Leasing Issues

Table 8 provides a summary of issues that could impact HABC’s projected leasing activity, along with potential solutions.

Table 8: Potential Leasing Issues and Solutions

Program	Description of Anticipated Leasing Issues and Possible Solutions
Public Housing	As noted, HABC anticipates a reduction in the number of public housing units available for leasing as a result of additional RAD conversions and the planned demolition/disposition of scattered site and conventional units. The projection of households to be served in FY 2019 factors in these reductions. Further changes to projected leasing may result from unanticipated changes to construction schedules, RAD financing schedules and other factors outside of HABC’s control. HABC will work to mitigate these situations where possible, with the goal of maximizing the leasing of units that are available for occupancy.
Leased Housing	<p>Due to a reduction in HCV funding by HUD, HABC stopped issuing vouchers to applicants on the HCV Program waiting list. Therefore, HABC was unable to maintain 850 tenant based vouchers leased to NEDs. However, notwithstanding the reduction in funding, HABC resumed issuing vouchers to NEDs in December 2017. HABC is fully committed to compliance with the Bailey Consent Decree requirements and achieving the 102,000 unit months leased by NED participants.</p> <p>Under its ACC, HABC expects to provide assistance for approximately 13,350 participants by the end of FY 2019. Providing additional project-based units to comply with the requirements of 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 2018 is an additional contributing factor in determining projected utilization.</p>

E. Waiting List Information for Beginning of FY 2019

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. Table 9 provides a summary of required wait list information.

Table 9: Waiting List Information

Housing Program(s)	Waiting List Type	Number of Households on Waiting List	Status	Are There Plans to Open the Waiting List During the Fiscal Year
Federal MTW Housing Choice Voucher Units: Tenant-Based	Community Wide	24,210	Closed	No
Federal MTW Housing Choice Voucher Units: Project-Based	Site-Based	7,686	Closed	No
Federal MTW Public Housing Units	Community Wide	24,174	Open	HABC plans to update and purge the waiting list in FY 2019 and may have to close the waiting list while undertaking this endeavor after which it will be reopened in FY 2019. HABC will also begin to implement the Centrally Administered Location Based waiting lists as part of the update process.
Federal MTW Public Housing & HCVP Units	Merged	4,850	Open/ Closed	The public housing waiting list is open; however there are no plans to open either the Tenant-based or Project-based waiting lists in FY 2019.
Thompson Vouchers	Program Specific	14,574	Closed	This waiting list closed on March 31, 2017.

Planned Waiting List Changes

HABC plans to transition its PH waiting list to a centrally-administered location-based waiting list (CALBWL) system. HABC’s approved ACOP has been revised to reflect implementation of CALBWL in public housing. On their pre-application, applicants will choose up to three (3) developments where they would like to live from within HABC’s general family, scattered site and senior-preference RAD properties. Based on their selections, HABC will place the applicant on the waiting list(s) for their chosen development(s). An applicant also has the option to choose the first-available waiting list if they have no preference for location. Applicants who choose this option will be placed on the waiting lists for all developments where they are eligible.

The CALBWL will not include developments or particular dwelling units covered by the Bailey Consent Decree, as amended by the Supplemental Decree (the “Bailey Properties”). Listed below are Bailey Properties, including the type of waiting list that will be used to lease the particular dwelling units:

- Vacancies at the following RAD sites will be filled using a centralized mixed-population waiting list or the reasonable accommodations transfer list:

- Allendale
- Bel Park Towers
- Bernard E. Mason
- The Brentwood
- Chase House
- Ellerslie

Govans Manor
Hollins House
J. Van Story Branch
Lakeview Tower and Lakeview Extension
McCulloh High Rise
Monument East
Primrose Place
Rosemont Towers
Wyman House

- Vacancies for the following dwelling units will be filled using a centralized senior population waiting list or the reasonable accommodations transfer list:

Pleasant View Gardens Senior – 12 UFAS Accessible Units developed pursuant to the *Bailey* Consent Decree

Pleasant View Gardens Family – 13 UFAS Accessible Units developed pursuant to the *Bailey* Consent Decree and one-bedroom units converted under RAD

Senior Terraces Apartment Building - 4 UFAS Accessible Units developed pursuant to the *Bailey* Consent Decree

- Vacancies for the following dwelling units will be filled using a centralized family population waiting list or the reasonable accommodation transfer waiting list.

Arbor Oaks (4 UFAS Accessible Units developed pursuant to the *Bailey* Consent Decree)
Heritage Crossing (4 UFAS Accessible Units developed pursuant to the *Bailey* Consent Decree)

Hillside Park

Townes at the Terraces (11 UFAS Accessible Units developed pursuant to the *Bailey* Consent Decree)

The RAD owner may use the CALBWL after conversion under RAD at Broadway Overlook. However, vacancies in non-*Bailey* UFAS Accessible Units developed prior to conversion must be filled using a centralized family population waiting list or the reasonable accommodations transfer list.

Other UFAS Accessible Units:

Vacancies in the UFAS Accessible Units in public housing, scattered site housing, or privately owned or managed property developed under the *Bailey* Consent Decree that use the Long-Term Affordable (LTA) Criteria will not be filled using the CALBWL. Vacancies of these units must be filled from the centralized public housing waiting list or the reasonable accommodations transfer list.

Notice and Disclosure to Applicants of Waiting List Change

Prior to transitioning the waiting list system, HABC will provide written notice to all active existing Public Housing applicants via first class mail to provide them with information on the new waiting list system. The notice will also provide applicants with instructions for updating their pre-application and selecting developments. HABC will provide new and existing

applicants marketing sheets for each development through our website or in print, if requested. These marketing sheets will include the development's location, number of units, number and size of accessible units, neighborhood amenities (i.e. transportation, schools, and hospitals) and the estimated wait time for that development.

Monitoring Demographic Changes to Public Housing

After the transition to the waiting list system is complete and all applicants are placed on the appropriate new waiting list(s), HABC will monitor and evaluate annually the demographic composition of public housing residents at developments included in the CALBWL to determine if there are any significant changes to protected classes. Once a year, HABC will create a report which identifies demographic data by development against the baseline data. This report and HABC's assessment will be made available to the public via our website. Should any significant change(s) occur, HABC will assess and determine a course of action to address any identified issues.

Additionally, HABC will use independent testers or other means satisfactory to HUD, to assure that location-based waiting lists are not being implemented in a discriminatory manner, and that no patterns or practices of discrimination exist. This will occur at least once every three years, and HABC will provide the results to HUD. HABC evaluations will cover disability and familial status as well as race and ethnicity. HABC will make changes in its location based waiting list system, as needed, based on the data and methods above to affirmatively further fair housing.

Notes on HABC's Waiting Lists

- The HCV tenant-based and project-based voucher waiting lists are currently closed.
- In FY 2019, the public housing waiting list will be updated and purged prior to the transition to the centrally administered location-based 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.
- The waiting list for Thompson PCD and Remedial Vouchers is maintained by BRHP and is separate from any other HABC waiting list. Application for, receipt of, or termination of a Thompson Voucher will not affect a family's standing on any other HABC waiting list. Waiting list procedures for the Thompson-related programs are described in the Special Administrative Plan as Appendix II in the HABC HCV Administrative Plan. As of December 31, 2017, there were 14,574 families on the waiting list for the Thompson Vouchers and 1,053 families were enrolled in the BRHP mobility counseling program that applicants for a Thompson Voucher must complete before receiving a voucher. The BRHP waiting list for Thompson Vouchers closed on March 31, 2017.

III. Proposed MTW Activities

This section of the MTW Annual Plan provides information on new MTW activities proposed for FY 2019. HABC simplified its MTW activity numbering system to provide a unique identifier that is easily understood by the public and HUD. The new format includes the year the activity was proposed and a number which starts at “1” each year with successive MTW activities in the same year following as 2, 3, and so on.

Activity 2019-01: Rent Simplification

Description of MTW Activity: HABC is proposing Rent Simplification as a new activity; however, one aspect of rent simplification involves the previously approved asset self-certification activity that HABC has closed out in the FY 2019 Plan and combined with this Rent Simplification activity. The Rent Simplification activity will be implemented in both the Public Housing and Housing Choice Voucher programs.

- *Exclusion of all FT Student Earned Income*
Under Rent Simplification, HABC will exclude all full-time student earned income for adult full time students, other than the head of household, co-head and spouse. HABC will continue to apply a dependent deduction to adult full-time students. Additionally, as HABC is excluding 100% of earned income for adult full-time students, HABC will verify full-time student status; however, HABC will not conduct verification of full-time student earned income.
- *Self-Certification of Asset Value and Income and Exclusion of Asset Income*
HABC will establish \$50,000 as the threshold for self-certification of asset value and income. When the market/face value of assets is over \$50,000, HABC will apply regulatory verification requirements. Additionally, HABC will exclude income from assets where the market/face value of the asset is up to \$50,000. When the market/face value of a family’s assets is in excess of \$50,000, HABC will calculate asset income by taking the market/face value of the family’s assets and multiplying that value by the established passbook savings rate.

Statutory Objective: This initiative will support the MTW statutory objectives of: (1) reducing costs and achieving greater cost effectiveness in Federal expenditures (currently this task costs \$24,047 and 781.5 man hours to complete. Once these activities are implemented the savings in money and man hours will be realized and staff can use this time to more effectively complete other tasks such as rent collection and home inspections).

Anticipated Impact: It is anticipated that this rent simplification activity will simplify transaction processing, improve administrative efficiency and increase economic self-sufficiency.

Anticipated Time Line: HABC plans to implement this activity in FY 2019.

Metrics: The following are proposed standard HUD MTW metrics applicable to this activity. Outcomes will be reported in the MTW Annual Report.

Metrics

<i>CE #1: Agency Cost Savings</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	<p>Number of Adult FT Students with Earned Income & Households with Assets: 1,563</p> <p>Time per FT Student and Household with Assets - Verification & Calculation: .5 hours</p> <p>Average Hourly Staff Rate: \$30.77</p> <p>Total Cost of Activity Prior to Implementation: \$24,047</p>	<p>Number of Adult FT Students with Earned Income & Households with Assets: 1,563</p> <p>Time per FT Student and Households with Assets - Verification & Calculation: 0 hours</p> <p>Average Hourly Staff Rate: \$30.77</p> <p>Anticipated Total Cost of Activity in FY 2019: \$0</p> <p>Savings: \$24,047</p>		
<i>CE #2: Staff Time Savings</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total amount of staff time dedicated to the task prior to implementation of the activity (in hours).	<p>Number of Adult FT Students with Earned Income & Households with Assets: 1,563</p> <p>Time per FT Student and Household with Assets - Verification & Calculation: .5 hours</p> <p>Total Time Spent on Activity Prior to Implementation 781.5</p>	<p>Number of Adult FT Students with Earned Income & Households with Assets: 1,563</p> <p>Time per FT Student and Households with Assets - Verification & Calculation: 0 hours</p> <p>Anticipated Total Time Spent on Activity in FY 2019: 0 hours</p> <p>Savings: 781.5 hours</p>		
<i>CE #3: Decrease in Error Rate of Task Execution</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average error rate in completing a task as a	5%	2%		

percentage (decrease)				
--------------------------	--	--	--	--

Authorizations: MTW Agreement Attachment C, (C) (11): This authorization waives certain provisions of Section 3(a)(2), 3(a)(3)(A) and Section 6(l) of the 1937 Act and 24 C.F. R. 5.603, 5.611, 5.628, 5.630, 5.632, 5.634 and 960.255 and 966 Subpart A and MTW Agreement Attachment C, (D) (2)(a). This authorization waives certain provisions of Section 8(o)(1), 8(o)(2), 8(o)(3), 8(o)(10) and 8(o)(13)(H)-(I) of the 1937 Act and 24 C.F.R. 982.508, 982.503 and 982.518 as necessary to implement the Agency’s Annual MTW Plan.

Additional Information for Rent Reform Activities

Impact Analysis:

- *FT Student Earned Income Exclusion*
There are currently 143 households with adult fulltime students who have earned income. Average gross household income will increase by \$480 per year as a result of this exclusion. Rent for each of these households will decrease by \$144 per year.
- *Asset Income Exclusion*
There are currently 1,420 households with recorded assets and of those households, 19 households have assets greater than \$50,000. Effectively, 99% of households with asset income will benefit from the asset income exclusion and may experience a decrease in rent. Of the 19 households with assets greater than \$50,000, only four of those households have imputed asset incomes where the other 15 households’ actual asset income is greater than the imputed asset income. Under the MTW policy, the 15 households with actual asset income will experience a decrease in rent as a result of this policy.

Hardship Criteria: As there is no adverse impact to participants by applying this policy, HABC has not established hardship criteria.

Description of Annual Reevaluation: HABC will determine the impact of this activity by identifying households impacted by the activity and reporting on the increase in gross household income as result of this policy.

Transition Period: HABC will transition PH and HCV households to the Rent Simplification policies at their next regular recertification after the policy is implemented.

Activity 2019-02: Local Fair Market Rent

Activity Description: Subject to funding availability, the proposed activity will be implemented for both HABC’s Leased Housing Program and the Baltimore Housing Mobility

Program operated by the Baltimore Regional Housing Partnership (BRHP). The Baltimore Regional Housing Partnership (BRHP) administers the vouchers for the Thompson Remedial and Partial Consent Decree vouchers. MTW flexibility continues to be utilized to support Thompson activities and Attachment C, section B.2 of the MTW Agreement authorizes HABC to partner with non-profit entities such as BRHP to implement some or all MTW activities.

HABC and BRHP propose to continue the current policy of establishing payment standards based on the 50th percentile FMRs. In combination with BRHP’s ongoing housing mobility and HCVP’s housing search efforts, continuation of the existing policy will promote expansion of housing choice for voucher holders and minimize any negative impacts to existing voucher holders and property owners. Annually, HABC and BRHP will adjust the Fair Market Rent and associated payment standards based on the most recently published 50th Percentile Rent Estimates.

HUD previously approved this activity as part of the FY2009 MTW Annual Plan. Subsequently, HUD approved 50th percentile FMRs for the metropolitan Baltimore area. Based on a determination that MTW authority was no longer required to implement the 50th percentile FMRs, HABC closed out the activity in FY2011; however HUD’s FMR’s will be published in October of 2018 at which time HABC and BRHP may be required to establish a new basis for its payment standards.

Statutory Objective: This activity will increase housing choices for low-income families.

Anticipated Impact: HABC anticipates that this activity will increase housing choice for program participants by increasing the number of units that are affordable to participants in low-poverty, high-opportunity areas.

Anticipated Timeline: HABC and BHRP currently apply the 50th percentile FMRs to the payment standards and will continue to implement this activity with the commencement of the HABC Fiscal Year on July 1, 2018 until amended.

Metrics:

<i>HC #7: Households Assisted by Services that Increase Housing Choice</i>				
Unit of Measurement	Baseline*	Benchmark*	Outcome	Benchmark Achieved?
Number of households receiving services aimed to increase housing choice (increase).	478*	120		
*Represents Thompson units only. Leased Housing families are not part of Mobility program services but will be subject to the 50% percentile FMR				
<i>HC #5: Increase in Resident Mobility</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?

Number of households able to move to a better unit and/or neighborhood of opportunity as a result of the activity (increase).	664	166*		
*Includes TB, PB and HUD-authorized Thompson units				

Impact Analysis:

- HABC has assessed the impact of the proposed activity and determined that there will be no negative impact on voucher holders under this activity.
- Approximately 478 BRHP applicants and 186 HCVP applicants have moved to areas of opportunity using the 50th percentile FMRs. This means that in FY 2017 nearly 57% of all new admissions moved directly into areas of opportunity under the current policy.
- Going to the 40th percentile FMRs will negatively affect at least 15% of the entire BRHP and HCVP voucher population and will hinder this progress towards increasing housing choice and mobility.”

Hardship Criteria: HABC has assessed the impact of the proposed activity and determined that it will have no adverse impact on voucher holders. As noted above, HABC and BRHP have utilized the 50th percentile FMRs to establish payment standards since FY2009. Therefore, continuation of this policy will not change existing rent policies and will not result in hardships to voucher holders.

Description of Annual Reevaluation: HABC will continue to monitor HUD published FMRs on an annual basis, and apply those FMRs to payment standards making them effective within three months of the publication of the HUD FMRs.

Transition Period: This activity essentially authorizes HABC and BRHP to continue utilization HCV rent policies that have been in place since FY2009. Therefore, no transition period is required or proposed.

Data Source: HABC and BRHP use their related software to track participants’ locations and outcomes.

Authorization Standard: Attachment C, sections B(2) which waives certain provisions of Sections 13 and 35 of the 1937 Act and 24 CFR 941 Subpart F and, D2a which waives certain provisions of Section 8(o)(1), 8(o)(2), 8(o)(3), 8(o)(10) and 8(o)(13)(H)-(I) of the 1937 Act and 24 C.F.R. 982.508, 982.503 and 982,518; “Single Fund Budget with Full Flexibility.”

Activity 2019-03: Project-Based Voucher Amendments to the HAP Contract

Description of MTW Activity: As a new activity, HABC is proposing to amend the Project-Based Voucher (“PBV”) HAP Contracts that are executed as a result of awarding vouchers for target populations. The amendment would set forth the following provisions as part of the PBV HAP Contract.

1. Subject to funding availability, the amendment would allow the Owner to obtain applicants directly from the Mayor’s Office of Human Services (MOHS) or other designated service provider for the chronically homeless and veterans or other such targeted population and refer such applicants to HABC to determine eligibility for receiving a voucher subsidy. All referrals will be placed on a waiting list maintained by HABC. HABC has been awarded 192 PBV’s for the chronically homeless and 182 PBV’s for veterans.”
2. The amendment would require the Owner to maintain the designated unit for the term of the PBV HAP contract. In the event the Owner fails to lease a designated unit to an approved applicant, such failure will be considered a default under the PBV HAP Contract. If the default is not cured within 60 calendar days, HABC can remove the unit from the HAP Contract, or recapture the amount of HAP paid for the period of time the tenant was occupying such unit in violation of the terms of the PBV HAP Contract.

Statutory Objective: This activity will increase housing choice for low-income families in certain target populations, i.e. homeless, veterans.

Anticipated Impact: HABC anticipates that this activity will increase housing choice for program participants by increasing the number of units that are affordable to participants in low-poverty areas.

Anticipated Time Line: HABC plans to implement this activity in FY 2019.

Metrics: The following are proposed standard HUD MTW metrics applicable to this activity. Outcomes will be reported in the MTW Annual Report.

<i>HC #1: Additional Units of Housing Made Available</i>				
Unit of Measurement	Baseline*	Benchmark**	Outcome	Benchmark Achieved?
Number of new housing units made available for households at or below 80% AMI as a result of the activity (increase). If units reach a specific type of household, give that type in this box.	Housing units of this type prior to implementation of the activity (number). This number may be zero.	Expected housing units of this type after implementation of the activity (number).	Actual housing units of this type after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
<i>HC #7: Households Assisted by Services that Increase Housing Choice (Agency Specific Metric)</i>				
Unit of Measurement	Baseline*	Benchmark**	Outcome	Benchmark Achieved?

Number of households receiving services aimed to increase housing choice (increase).	65	374		
HC #5: Increase in Resident Mobility(Agency Specific Metric)				
Unit of Measurement	Baseline*	Benchmark**	Outcome	Benchmark Achieved?
Number of households able to move to a better unit and/or neighborhood of opportunity as a result of the activity (increase).	65	374		
*Represents households already under contract with Referral Agreements. **Total vouchers awarded through RFP's B-1798-15 and B-1790/91-15 (Homeless and Veteran populations combined)				
CE #1: Agency Cost Savings				
Unit of Measurement	Baseline*	Benchmark**	Outcome	Benchmark Achieved?
Total Cost of Task in Dollars	Cost of task prior to implementation of the activity (in dollars).	Expected cost of task after implementation of the activity (in dollars).	Actual cost of task after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
CE #2: Staff Time Savings				
Unit of Measurement	Baseline*	Benchmark**	Outcome	Benchmark Achieved?
Total Time to Complete the Task in Staff Hours	Total amount of staff time dedicated to the task prior to implementation of the activity (in hours).	Expected amount of total staff time dedicated to the task after implementation of the activity (in hours).	Actual amount of total staff time dedicated to the task after implementation of the activity (in hours).	Whether the outcome meets or exceeds the benchmark.

Authorizations: MTW Agreement Attachment C, (D) (1a): This authorization waives certain provisions of Section 8(o)(7) of the 1937 Act and 24 C.F. R.982.162 as necessary to implement the Agency's Annual MTW Plan.

Additional Information for Rent Reform Activities

Hardship Criteria: Relocation of tenant, if otherwise eligible, to another unit of the appropriate size when one becomes available; Owner will be responsible for relocation costs.

IV. Ongoing MTW Activities

A. Implemented Activities

Activity 2006-01: Multi-Year Recertifications

Description/Update of MTW Activity: 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 Public Housing and HCV families once every 24 months except under the circumstances outlined below:

Triennial Recertification

- PH Families on Flat Rent
- PH and HCV Families with 100% Fixed Income

Annual Recertification

- PH and HCV Families reporting zero income
- 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)).

Families may request an interim recertification if needed pursuant to HABC's current policy.

Approval and Implementation: HCV Program: Two-year recertifications were approved in FY 2006 and implemented in 2007. Three-year recertifications were implemented in 2014. Public Housing: Approved in 2006 and implemented in 2011. Placed on hold FY 2014; reactivated in FY 2016.

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.

Proposed Changes: In FY 2019 HABC will conduct recertifications every three years for Public Housing and HCV families when 100% of the family income is from fixed income sources, i.e. SS, SSI and Pension. This policy is already in effect for Housing Choice Voucher elderly and disabled families. No additional MTW waivers are required for the three-year recertification schedule modification.

Changes to Metrics, Baselines, and Benchmarks: No changes have been made to baselines and benchmarks. HABC will report on outcomes in the MTW Report.

Activity 2006-02: Enhanced Project Based Voucher Program

(Formerly Limits on Project Based (PB) Vouchers, Increased PB Units in a Project or Building, and HAP Contract Modifications – Floating Units and Amendments to PB HAP Contracts)

Description/Update of MTW Activity: HABC operates a PB component under its Housing Choice Voucher Program. Through its PB voucher program, HABC partners with for-profit and non-profit housing providers to expand the supply of affordable housing to low-income families. To meet the evolving needs of the agency and the participants served, HABC has enhanced and expanded its existing PB program to include the components outlined below. The Enhanced PB Program components apply to all PB units, including, but not limited to the Thompson PB units, Bailey LTA and PB units and the non-Bailey LTA PB units.

- **Percentage of Voucher Allocation:** HABC reserves the right to allocate up to 30% of its Tenant Based HCV funding for PB vouchers.
- **Project Cap:** HABC may enter into PB 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 PB vouchers under this MTW initiative are placed under a HAP contract upon turnover.
- **Floating Units:** HABC will allow for floating units instead of identifying specific units in the HAP contract in the PB program.
- **Amendments to PB HAP Contracts:** Using its MTW authority, HABC plans to waive the three-year restriction on amending HAP contracts. HABC may amend the HAP contract at any time during the initial 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 PB units and the non-Bailey LTA PB units.

Approval and Implementation: Percentage of Voucher Allocation – Approval and Implementation: FY 2006; Per-Building and Per-Project Cap Waiver – Approval and Implementation: FY 2010; Floating Units: Approval: FY 2009, Implementation: FY 2010, Amendments to PB HAP Contracts – Approval FY 2015, Implementation FY 2019.

Hardship: Not applicable

Proposed Changes: In the FY 2019 Plan HABC is combining the previously approved PB activities on Limits on Project Based Vouchers and Increased Project Based Units in a Project or Building and HAP Contract Modifications – Floating Units Project Based Program activities under this Enhanced Project Based Program activity. Additionally, HABC has also added the previously approved and “on-hold” activity related to Amendments to PB HAP Contracts to this Enhanced PB program activity.

Changes to Metrics, Baselines, and Benchmarks: No changes have been made to baselines and benchmarks. HABC will report on outcomes in the MTW Report.

Activity 2006-03: Thompson Biennial Recertifications

Description/Update of MTW Activity: Pursuant to HABC’s MTW authority, families participating in the Baltimore Housing Mobility Program as administered by the Baltimore Regional Housing Partnership (BRHP) will have their household composition and income re-determined at least once every 25 months.

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

Hardship: BRHP’s 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.

Proposed Changes: No changes are proposed that require MTW authority.

Changes to Metrics, Baselines, and Benchmarks: No changes have been made to baselines and benchmarks. HABC will report on outcomes in the MTW Report

Activity 2007-01: Mobility Program Enhancements
(Formerly Exception Payment Standards and Security Deposit Assistance)

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.

Additionally, 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.

Approval and Implementation: Exception Payment Standards Approval and Implementation: 2007, Security Deposit Assistance Approval and Implementation: 2017.

Hardship: There is no adverse impact to households by applying a higher payment standard for moves to an opportunity area and/or providing security deposit assistance.

Proposed Changes: HABC will combine the previously HUD approved activity Security Deposit Assistance with the Mobility Program Enhancements (aka Exception Payment Standards) activity. Additionally, BHRP will expand the assistance to Mobility Program participants to include one-time incentive payments to landlords, one-time apartment application

fees and/or moving costs for families with a Thompson voucher, and ongoing counseling fees associated with the pre- and post-move counseling programs for the Mobility Program.

Changes to Metrics, Baselines, and Benchmarks: No changes have been made to baselines and benchmarks. HABC will report on outcomes in the MTW Report

Activity 2010-01: Unit Sizes

Description/Update of MTW Activity: Under this initiative, HABC requires participating HCV 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 (1) the lower of the actual unit size or (2) authorized voucher size.

Approval and Implementation: 2010

Hardship: 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 have been made to find an appropriately sized unit or based on a reasonable accommodation request.

Proposed Changes: No changes are proposed that require MTW authority.

Changes to Metrics, Baselines, and Benchmarks: No changes have been made to baselines and benchmarks. HABC will report on outcomes in the MTW Report.

Activity 2010-02: Bailey Long-Term Affordable Project-Based Voucher Contract

Description/Update of MTW Activity: As part of its MTW program, HABC established an initiative in 2010, referred to as the Bailey Long-Term Affordable Project Based Voucher (“Bailey 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 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 an amendment to the Housing Assistance Payment (HAP) contract that sets forth requirements for the Bailey LTA PB units. The amendment 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.

Approval and Implementation: 2010

Hardship: Not applicable

Proposed Changes: No changes are proposed that require MTW authority.

Changes to Metrics, Baselines, and Benchmarks: No changes have been made to baselines and benchmarks. HABC will report on outcomes in the MTW Report

Activity 2010-03: Thompson Risk Based Inspections

Description/Update of MTW Activity: Pursuant to HABC’s MTW authority, units in the BRHP Program will be 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.

Approval and Implementation: 2010

Hardship: There are no adverse impacts to households by having inspections completed every 25 months. Households can request complaint inspections at any time.

Proposed Changes: No changes are proposed that require MTW authority.

Changes to Metrics, Baselines, and Benchmarks: No changes have been made to baselines and benchmarks. HABC will report on outcomes in the MTW Report

Activity 2012-01: Rent Simplification - Thompson

(Formerly Asset Income, Adjusted Income and FT Student Adoption Assistance Exclusion for Thompson Participants)

Description/Update of MTW Activity: Pursuant to HABC’s MTW authority, for participants in the BRHP mobility program, HABC has implemented several rent simplification activities that support economic self-sufficiency and cost effectiveness in Federal expenditures. Rent simplification includes the following:

- **Modified Deductions:** The gross annual income shall be reduced using the standard deductions outlined below. There will be a standard deduction for working families, disabled families and non-disabled families without wages. The deductions below replace all other regulatory deductions. 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)
- **Exclusion of FT Student & Adoption Assistance Payments:** The definition of annual income is modified to exclude all earned income from full-time adult students, other than the head of household, co-head and spouse as well as exclude all adoption assistance payments.
- **Asset Income Exclusion and Self-Certification:** HABC also excludes all income from assets when the cash value of the asset is less than \$50,000. Additionally, for households where the cash value of the assets is less than \$50,000 BHRP will allow self-certification of asset value and income. 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.

Approval and Implementation: Adjusted Income and Asset Income: 2012, FT Student and Adoption Assistance Exclusion: 2014

Hardship: HABC will apply its financial hardship policies to households who demonstrate hardship due to application of these policies.

Proposed Changes: In FY 2019 HABC is combining the three previously HUD approved income and rent related activities (Asset Income, Adjusted Income & Full-Time Student/Adoption Assistance Exclusion) for the Thompson units into one Rent Simplification activity. No changes are proposed that require MTW authority.

Changes to Metrics, Baselines, and Benchmarks: No changes have been made to baselines and benchmarks. HABC will report on outcomes in the MTW Report

Activity 2014-01: 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 at newly constructed or redeveloped sites where the source of funding for housing assistance is project-based vouchers.

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 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.

Approval and Implementation: 2014

Hardship: Not applicable

Proposed Changes: No changes are proposed that require MTW authority.

Changes to Metrics, Baselines, and Benchmarks: No changes have been made to baselines and benchmarks. HABC will report on outcomes in the MTW Report

Activity 2017-01: Sponsor-Based - Project-Based Transitional Housing

Description of MTW Activity: The Transitional Housing Program allows 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.

HABC anticipates execution of the HAP contract for these units in the first quarter of FY 2019.

Approval and Implementation: Approval: FY 2017; Implementation: FY 2019

Hardship: Not applicable

Proposed Changes: No changes are proposed that require MTW authority.

Changes to Metrics, Baselines, and Benchmarks: No changes have been made to baselines and benchmarks. HABC will report on outcomes in the MTW Report

Activity 2018-01: Landlord Payment Methods and Electronic Communications

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. 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. Less than 1% of 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.

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.

Approval and Implementation: Approval: FY 2018; Implementation: FY 2019

Hardship: Not applicable

Proposed Changes: No changes are proposed that require MTW authority.

Changes to Metrics, Baselines, and Benchmarks: No changes have been made to baselines and benchmarks. HABC will report on outcomes in the MTW Report

B. Not Yet Implemented

There are no activities to report which have been approved and not yet implemented.

C. Activities on Hold

Activity 2006-04: Family Self Sufficiency

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.

Activity 2009-01: MTW Homeownership Program

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.

Activity 2009-02: Section 811 Supportive 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.

Activity 2012-02: Direct Homeownership Program

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

Activity 2006-05: Risk Based Inspections

Description of MTW Activity: HABC 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, are inspected annually. This activity was approved in FY 2006 and fully implemented in FY 2014.

Reason for Closing Out Activity: Biennial Inspections were approved by HUD as an HABC activity in FY 2006. In FY 2019, HABC is closing out this activity due to the 2014 Appropriations Act that allows HABC to transition to a biennial inspection schedule without MTW authority.

Activity 2007-02: Project-Based for Transitional Housing

Description of MTW Activity: HABC provided PB vouchers to the Collington House facility that is a transitional housing program. This MTW activity was approved in the FY 2007-2008 Annual Plan.

Reason for Closing Out Activity: In 2014, the Collington House facility lost its eligibility to retain project-based vouchers and this program was closed out.

Activity 2009-03: Payment Standards at the 50th Percentile

Description of MTW Activity: HUD had adjusted the area Fair Market Rent (FMR) to the 50th percentile for HABC; therefore, MTW authority was no longer required and this activity was closed out in FY 2011. This activity was approved in FY 2009. Please note that this activity is being re-proposed in the FY 2019 Plan as the 50th percentile FMR is being phased out.

Reason for Closing Out Activity: At the time, the activity was closed, use of the 50th percentile FMR was provided by HUD and MTW authority was not needed.

Activity 2009-04: TDC Limits

Description of MTW Activity: 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.

Reason for Closing Out Activity: In January 2012 the last scattered site unit was acquired and this activity has been closed out.

Activity 2009-05: HAP Contract Modifications

Description of MTW Activity: Using MTW authority, HABC will allow for floating units instead of identifying specific units in the HAP contract in the Project Based Voucher program. This activity was approved in FY 2009 and implemented in FY 2010.

Reason for Closing Out Activity: This previously HUD approved activity is being closed in FY 2019 and combined with other previously HUD approved Project Based program activities. The combined activity is now call the Enhanced Project Based Voucher Program.

Activity 2010-04: Utility Allowance for Families Living in Larger Units than Voucher Size

Description of MTW Activity: 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. This MTW activity was approved in FY 2010, was incorporated into the Unit Size activity and implemented in FY 2012.

Reason for Closing Out Activity: Based upon the 2014 Appropriations Act language HABC no longer needs to designate this activity as MTW. This activity was closed in FY 2014.

Activity 2010-05: Gilmor Self Sufficiency Initiative

Description of MTW Activity: This activity simplified the rent policy for staff and residents; and encouraged employment, job retention, and wage progression. A shortage of funds to provide employment counseling forced the closure of this program in FY 2015. This activity was closed out in FY 2015.

Reason for Closing Out Activity: In FY 2017 HABC became the recipient of a \$2.5 million Jobs Plus grant that provides employment counseling to public housing residents that otherwise could not be provided under MTW

Activity 2011-01: Rent Increase Determinations

Description of MTW Activity: This activity increased cost effectiveness in Federal expenditures by keeping program spending within budgetary limits. Suspending rent increase adjustments helped keep HCV program spending within budgetary limits. Exceeding available funding had the potential to force HABC to withdraw assistance from a number of families causing a hardship for those families and property owners. This MTW activity was intended to keep spending within budgetary limits. It was closed out in FY 2016.

Reason for Closing Out Activity: HABC was able to maintain budgetary limits without imposing suspension of rent increases to owners.

Activity 2011-02: Asset Self-Certification

Description of MTW Activity: To streamline operations, HABC allowed residents to self-certify income from assets with total asset values per household of less than \$5,000. The Asset Self-Certification activity was approved by HUD in FY 2011.

Reason for Closing Out Activity: HABC is closing out this activity and re-proposing it in FY 2019 as part of the Rent Simplification activity. This action will allow HABC to report on all Rent Simplification activity features under one activity.

Activity 2012-03: Rent Policy

Description of MTW Activity: HABC received HUD approval in FY 2012 to implement an agency-wide the rent policy adopted for Gilmore Homes; however, due to lack of funding and the on-going revisions of the Gilmore Homes rent policies, this activity was placed on hold in FY 2014. This activity was identical to the Gilmore Homes Demonstration Program and was implemented at the remaining HABC sites.

Reason for Closing Out Activity: A shortage of funds to provide employment counseling forced the closure of this program in FY 2015.

Activity 2012-04: Adjusted Income for Thompson Participants

Description of MTW Activity: Pursuant to HABC's MTW authority, for participants in the Baltimore Housing Mobility Program, the gross annual income is reduced using the standard deductions outlined below. This activity was approved and implemented in FY 2012. There is a standard deduction for working families, disabled families and non-disabled families without wages. The deductions below replace all other regulatory deductions. 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)

Reason for Closing Out Activity: This previously HUD approved activity is being closed in FY 2019 and combined with other previously HUD approved rent simplification activities for the Thompson units. The combined activity is now call Rent Simplification –Thompson.

Activity 2013-01: Adoption of New Investment Policies for HABC

Description of MTW Activity: 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.

Reason for Closing Out Activity: HABC decided not to implement this activity due to the terms of a General Depository Agreement with the State. This activity was never implemented.

Activity 2013-02: Journey Home

Description 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.

Reason for Closing Out Activity: Journey Home Program was closed in FY 2016. There are no active participants whose housing assistance is funded by HABC

Activity 2014-02: Exclude Income from Full-Time Students and Adopted Household Members

Description of MTW Activity: Using MTW authority, HABC modified the definition of annual income by excluding FT student earned income and adoption assistance income for families living in Thompson units. These exclusions were part of an effort to support economic self-sufficiency as well as to streamline program administration. As 100% of the income from these two sources is excluded, third party verification of income is not required. This activity was approved and implemented in FY 2014.

Reason for Closing Out Activity: This previously HUD approved activity is being closed in FY 2019 and combined with other previously HUD approved rent simplification activities for the Thompson units. The combined activity is now called Rent Simplification –Thompson.

Activity 2015-01: Encouraging Leasing in Higher Opportunity Neighborhoods

Description of MTW Activity: Using its MTW authority, the Baltimore Regional Mobility Program required families to select units that are consistent with and not larger than the dwelling unit size listed on their voucher. This policy applied to new admissions as well as to participating households who requested program moves. HABC, on a case by case basis, made exceptions to this policy as a reasonable accommodation.

Reason for Closing Out Activity: 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 FY 2016.

Activity 2015-02: 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.

Reason for Closing Out Activity: This MTW activity was placed on “HOLD” IN FY 2014 due to comments from the public and subsequently “CLOSED” in FY 2016.

Activity 2015-03: The Front Door Program

Description 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.

Reason for Closing Out Activity: The contract ended December 31, 2014, six months into HABC’s FY 2015 and was not renewed, which resulted in closure of the activity.

Activity 2015-04: Project Based Voucher Amendments to the HAP Contract (Leased Housing)

Description/Update of MTW Activity: Using its MTW authority, HABC waived the three-year contract amendment restriction, which will allow HABC to amend the HAP contract at any time during the initial 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. This activity was previously on hold and was approved in FY 2015.

Reason for Closing Out Activity: This previously HUD approved activity is being closed in FY 2019 and combined with other previously HUD approved Project Based program activities. The combined activity is now called the Enhanced Project Based Voucher Program.

Activity 2017-02: Security Deposit Assistance

Description of MTW Activity: 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. This activity was approved and implemented in 2017.

Reason for Closing Out Activity: This previously HUD approved activity is being closed in FY 2019 and combined with other previously HUD approved Mobility Program Enhancement activities. HABC will also modify this activity in FY 2019 under the previously approved Mobility Enhancement activity.

V. MTW Sources and Uses of Funding

This section of the Annual Plan describes HABC’s planned sources and uses of MTW Block Grant funds in FY 2019. Planned sources and uses for other HUD, other federal, State and Local funds and other Non-MTW funds are summarized in a separate attachment. The projected sources and uses are based on current information, and are subject to revision as conditions and or assumptions change.

A. Planned Sources and Uses of MTW Funds in FY 2019

HABC’s 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 (DDT) Funding
- Replacement Housing Factor (RHF) Funding

As previously noted, in December 2013, HABC received HUD approval of a Portfolio Award under the RAD program covering 24 public housing sites and more than 3,754 units. In FY 2018, 18 of these sites totaling 3,001 units were successfully converted from the public housing program to long-term project-based assistance under RAD. In FY 2019, HABC projects that an additional 753 units will be converted under RAD.

Tables 10 and 11 below provide estimated sources and uses of MTW funds for FY 2019. As HABC’s funding levels for future periods are unknown at the present time, this table provides preliminary projections. Actual sources and uses are expected to vary based on the level of funding provided to HABC and the level of actual expenses. The tables follow HUD’s required formats and do not include information on Non-MTW funding sources and uses.

Table 10: Estimated Sources of MTW Funding for FY 2019

Sources		
FDS Line Item	FDS Line Item Name	Dollar Amount
70500 (70300+70400)	Total Tenant Revenue	\$ 22,186,437
70600	HUD PHA Operating Grants	\$ 295,271,105
70610	Capital Grants	\$ 19,330,308
70700 (70710+70720+70730+70740+70750)	Total Fee Revenue	\$ 0
71100+72000	Interest Income	\$ 502,291
71600	Gain or Loss on Sale of Capital Assets	\$ 0

Sources		
FDS Line Item	FDS Line Item Name	Dollar Amount
71200+71300+71310+71400+71500	Other Income	\$ 719,177
70000	Total Revenue	\$ 338,009,318

Notes to Sources:

1. Tenant Revenue is based on 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 2019.
2. HABC's Total Operating Grants of \$295,271,105 from HUD include the following funding estimates:
 - Section 8 HCV Housing Assistance Payments (HAP) subsidies in the amount of \$149,248,781 for Regular HABC Vouchers, including Port ins and \$67,439,753 for Thompson Partial Consent Decree and Remedial Vouchers.
 - Ongoing Administrative Fee Earned in the amount of \$12,430,021 (\$9,747,674 for Regular HABC Vouchers, \$2,682,347 for Partial Consent Decree and Remedial Vouchers) is calculated based on an estimated proration at 73%.
 - Public Housing Subsidies of \$63,998,998 is budgeted based on an estimated 90% funding proration for the fiscal year ending June 30, 2019.
 - Capital Fund soft costs in the amount of \$2,153,552 are estimated for administering the planned capital improvement and operating activities.
3. Capital Grants Hard Costs funding of \$19,330,308 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 FY19 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.

Table 11: Estimated Uses of MTW Funding for FY 2019

Uses		
FDS Line Item	FDS Line Item Name	Dollar Amount
91000 (91100+91200+91400+91500+91600+91700+ 91800+91900)	Total Operating – Administrative	\$36,875,120
91300+91310+92000	Management Fee Expense	\$2,626,818
91810	Allocated Overhead	\$(416,870)
92500(92100+92200+92300+92400)	Total Tenant Services	\$1,619,632

Uses		
FDS Line Item	FDS Line Item Name	Dollar Amount
93000 (93100+93600+93200+93300+93400+93800)	Total Utilities	\$17,275,201
93500+93700	Labor	\$0
94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	\$33,472,870
95000 (95100+95200+95300+95500)	Total Protective Services	\$201,649
96100 (96110+96120+96130+96140)	Total Insurance Premiums	\$2,327,238
96000 (96200+96210+96300+96400+96500+96600+96800)	Total Other General Expenses	\$9,376,182
96700 (96710+96720+96730)	Total Interest Expense and Amortization Cost	\$3,621,323
97100+97200	Total Extraordinary Maintenance	\$605,150
97300+97350	Housing Assistance Payments + HAP Portability-In	\$214,288,534
97400	Depreciation Expense	\$21,631,473
97500+97600+97700+97800	All Other Expenses	\$0
90000	Total Expenses	\$343,504,320

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

Total Expenses	\$343,504,320
Less: Depreciation Expense	\$(21,631,473)
Capital Hard Cost	\$19,732,446
MTW Uses of Funds	\$341,605,293

Uses of funds exceed Sources of funds by \$3,595,974, which will be funded by MTW reserves.

Notes to Uses:

1. Administrative expenses include salaries and benefits for administrative staff, 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 Baltimore Regional Housing Partnership (BRHP) for the Mobility counseling program.

3. Allocated Overhead is calculated based on HUD's approved Local Asset Management Program (LAMP) since FY 2010. The proposed updated cost allocation calculations for FY 2019 are included in the LAMP attached as an appendix to this Annual Plan.
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 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 \$214,288,534 (\$149,248,781 for Regular HABC Vouchers-including Port-ins, \$29,578,591 for Partial Consent Decree Vouchers and \$35,461,162 for Remedial Vouchers). The Plaintiffs of the Thompson Consent Decree have created a non-profit corporation, BRHP, to serve as Administrator as of January 2013; therefore, the HAP amount for Thompson Consent Decree and Remedial vouchers in FY 2019 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. Use of 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 2019 using the single fund flexibility concept:

- HABC continues to use the prior year’s MTW Block Grant reserve fund for renovations and development of UFAS units using the single fund flexibility concept.

C. Local Asset Management Plan (LAMP)

Is the PHA allocating costs within statute?	No
Is the PHA implementing a local asset management plan (LAMP)?	Yes
Has the PHA provided a LAMP in the appendix?	Yes

HUD has approved HABC’s LAMP as part of the Annual Plan process since FY 2010. The proposed updated LAMP cost allocation calculations for FY 2019 are included in Appendix C. The indirect cost rate for 2018 will be approximately 13.21% for MTW programs and 12.38% for Non-MTW programs.

VI. Administrative

A. Resolution

A Resolution approving the FY 2019 MTW Annual Plan and the MTW Plan Certification of Compliance was adopted by the HABC Board of Commissioners at the April 2018 meeting, following the public review process and public hearing. The Resolution is included in Appendix A.

B. Public Review Process

HABC provided public notice of the draft FY 2019 MTW Annual Plan and posted the Plan on its website. HABC also made copies of the FY 2019 Annual Plan at HABC's main offices and at the Enoch Pratt Free Library. A 30-day public comment period to allow for resident and general public review was provided from February 26, 2018 through March 28, 2018. A public hearing was held on March 22, 2018 at Pleasant View Gardens 201 N. Aisquith Street, Baltimore an accessible facility. Prior to finalizing the Plan, HABC considered all comments received during the public review process. See Appendix E for additional public notice and comment period materials.

C. Evaluations

HABC will continue to monitor and evaluate MTW activities during FY 2019. 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.

D. Annual Statement/Performance and Evaluation Report

The Annual Statement/Performance and Evaluation Reports for all capital grants with unexpended amounts are included in Appendix D.

**Appendix A:
Board Resolution**

**A Resolution of the Board of Commissioners
Approving the Moving to Work Annual Plan
for Fiscal Year 2019 and the Housing Choice
Voucher Program Administrative Plan for
Fiscal Year 2019.**

PH-04-2018-9

HOUSING AUTHORITY OF BALTIMORE CITY
A Resolution of the Board of Commissioners Approving
the Moving to Work Annual Plan and the Housing Choice Voucher Administrative Plan
for Fiscal Year 2019

WHEREAS, Section 204 of the Omnibus Consolidated Rescissions and Appropriations Act of 1996 (Pub. L. 104-134) established statutory framework known as the Public Housing/Section 8 Moving to Work Demonstration (“MTW”) Program; and

WHEREAS, the U.S. Department of Housing and Urban Development (“HUD”) determined that HABC was eligible to participate in the MTW Program; and

WHEREAS, on December 24, 2008, HABC and HUD entered into an Amended and Restated MTW Agreement (the “MTW Restated Agreement”), setting forth the terms and conditions for HABC’s continued participation in the MTW Program; and

WHEREAS, in accordance with Section VII. A.1.f. of the MTW Restated Agreement and Attachment B thereto, HABC has prepared its Annual MTW Plan for Fiscal Year 2019 (the “FY 2019 Annual Plan”) consistent with the terms and objectives of the MTW Restated Agreement; and

WHEREAS, HABC has made the FY 2019 Annual Plan and revisions to the FY 2019 Housing Choice Voucher Program (“HCVP”) Administrative Plan, 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”) for a period of thirty (30) days; and

WHEREAS, HABC met with the Resident Advisory Board and other resident organizations throughout the planning process to discuss the FY 2019 Annual Plan, including the revisions to the HCVP Administrative Plan, and gathered input; and

WHEREAS, on March 22, 2018, HABC held a public hearing and received public comments on the FY 2019 Annual Plan, and in accordance with the MTW Restated Agreement HABC has considered all comments received on the FY 2019 Annual Plan, including the revisions to the FY 2019 HCVP Administrative Plan.

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

1. The FY 2019 Annual Plan is hereby approved for submission to HUD.
2. The FY 2019 Administrative Plan is hereby approved.

3. The FY 2019 Annual Plan Certifications of Compliance with Regulations (the "Certifications"), attached hereto as Exhibit A, are hereby adopted, and the Chairman of the Board is hereby authorized to execute such Certifications on behalf of the Board.

4. Upon approval by HUD, Executive Director shall be authorized to cause the implementation of the FY 2019 Annual Plan.

5. 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

EXHIBIT A

**CERTIFICATIONS OF COMPLIANCE WITH
REGULATIONS**

Certifications of Compliance

**Annual Moving to Work Plan
Certifications of Compliance**

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

Certifications of Compliance with Regulations: Board Resolution to Accompany the Annual Moving to Work Plan*

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairman or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the Annual Moving to Work Plan for the PHA fiscal year beginning July 1, 2017, hereinafter referred to as "the Plan", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:

1. The PHA published a notice that a hearing would be held, that the Plan and all information relevant to the public hearing was available for public inspection for at least 30 days, that there were no less than 15 days between the public hearing and the approval of the Plan by the Board of Commissioners, and that the PHA conducted a public hearing to discuss the Plan and invited public comment.
2. The PHA took into consideration public and resident comments (including those of its Resident Advisory Board or Boards) before approval of the Plan by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the Annual MTW Plan.
3. The PHA certifies that the Board of Directors has reviewed and approved the budget for the Capital Fund Program grants contained in the Capital Fund Program Annual Statement/Performance and Evaluation Report, form HUD-50075.1.
4. The PHA will carry out the Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990.
5. The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.
6. The Plan contains a certification by the appropriate State or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice, for the PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan.
7. The PHA will affirmatively further fair housing by examining its programs or proposed programs, identify any impediments to fair housing choice within those programs, address those impediments in a reasonable fashion in view of the resources available and work with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement and maintain records reflecting these analyses and actions.

8. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
9. The PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
10. The PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
11. The PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.
12. The PHA will comply with requirements with regard to compliance with restrictions on lobbying required by 24 CFR Part 87, together with disclosure forms if required by this Part, and with restrictions on payments to influence Federal Transactions, in accordance with the Byrd Amendment and implementing regulations at 49 CFR Part 24.
13. The PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.
14. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
15. The PHA will provide HUD or the responsible entity any documentation needed to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58. Regardless of who acts as the responsible entity, the PHA will maintain documentation that verifies compliance with environmental requirements pursuant to 24 Part 58 and 24 CFR Part 50 and will make this documentation available to HUD upon its request.
16. With respect to public housing the PHA will comply with Davis-Bacon or HUD determined wage rate requirements under section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
17. The PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.
18. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.
19. The PHA will comply with the policies, guidelines, and requirements of OMB Circular No. A-87 (Cost Principles for State, Local and Indian Tribal Governments) and 24 CFR Part 85 (Administrative Requirements for Grants and Cooperative Agreements to State, Local and Federally Recognized Indian Tribal Governments).
20. The PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the Moving to Work Agreement and Statement of Authorizations and included in its Plan.
21. All attachments to the Plan have been and will continue to be available at all times and all locations that the Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations

identified by the PHA in its Plan and will continue to be made available at least at the primary business office of the PHA.

Housing Authority of Baltimore City MD002
PHA Name PHA Number/HA Code

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)

Joseph Smith Chairman, HABC Board of Commissioners
Name of Authorized Official Title

Joseph Smith April 11, 2018
Signature Date

*Must be signed by either the Chairman or Secretary of the Board of the PHA's legislative body. This certification cannot be signed by an employee unless authorized by the PHA Board to do so. If this document is not signed by the Chairman or Secretary, documentation such as the by-laws or authorizing board resolution must accompany this certification.



Baltimore City Department of
**HOUSING & COMMUNITY
DEVELOPMENT**

Certification of Consistency with the Baltimore City Consolidated Plan

I certify that the Housing Authority of Baltimore City's Moving to Work Annual Plan for Fiscal Year 2019 is consistent with the HUD approved five-year Baltimore City Consolidated Plan of July 2015 through June 2020. Specific sections of the Consolidated Plan that were developed in cooperation with the Housing Authority of Baltimore City include: Need Assessment Section NA-35 Public Housing; Market Analysis Section MA-25 Public and Assisted Housing; Strategic Plan Sections SP-40 Institutional Delivery Structure, SP-45 Goals Summary, SP-50 Public Housing Accessibility and Involvement.

Specific goals in the Baltimore City Consolidated Plan consistent with goals in the Housing Authority of Baltimore City's Moving to Work Annual Plan for Fiscal Year 2019 include:

- SP-45 Goal 2: Provide Affordable Rental Housing
- SP-45 Goal 6: Provide Housing for Non-Homeless Special Needs Populations
- SP-45 Goal 12: Provide Housing for Homeless and At-Risk of Homelessness
- SP-45 Goal 14: Rehab of Existing Affordable Rental Housing
- SP-45 Goal 16: Implement Fair Housing Practices.

The Baltimore City Consolidated Plan contains a certification, signed by the Commissioner of the Baltimore City Department of Housing and Community, that it will affirmatively further fair housing including the undertaking of an Analysis of Impediments to Fair Housing Choice.

Name of Certifying Jurisdiction: Baltimore City

Certifying Official of the Jurisdiction: Stephen Janes

Title: Assistant Commissioner, Baltimore City Department of Housing and Community Development

Signature: 

Date: April 4, 2018

Appendix B:
Asset Management Table

ASSET MANAGEMENT TABLE FY 2019

Appendix B

Community	AMP Nos.	*Non-Dwelling Units	*PIC ACC Units - January 2018	*Asset Management	**Other Units	Development Activities	Capital Improvement Activities	Demolition/Dispo Activities	Management
Latrobe Homes	MD002000001	0	669	0	0	None	See Capital Program - EPC implemented.	Potential removal of interior structures to reduce density and improve circulation	HABC
McCulloh Homes (Low-rise Units)	MD002000002	0	556	0	0	Strategic Planning Process to address future plans for this site. Letter of Interest sent to HUD for consideration of potential RAD conversion.	See Capital Program – Potential EPC site	N/A	HABC
Perkins Homes	MD002000003	0	629	0	0	HABC submitted a Choice Neighborhood Implementation (CNI) application for FY 17 funding. The application calls for the replacement of the Perkins bedroom count in the CNI footprint.	See Capital Program – Potential EPC site	Under the CNI application, HABC proposes to dispose of all Perkins units	HABC
Poe Homes	MD002000004	1	288	0	0	Strategic Planning Process to address future plans for this site.	See Capital Program - EPC implemented.		HABC
Douglass Homes	MD002000005	3	387	0	0	None	See Capital Program.	N/A	HABC
Gilmor	MD002000006	6	548	0	0	Strategic Planning Process to address future plans for this site. Letter of Interest sent to HUD for consideration of potential RAD conversion.	See Capital Program - EPC implemented	HABC will submit a demolition application for 132 walk-up units.	HABC
O'Donnell Heights	MD002000009	1	304	0	0	Phase 1A was completed in FY 2014. The financial closing for Phase 1B took place in November, 2016; construction completion April 2018.	See Capital Program	Potential disposition application submission for portion of Phase 2 site area along with Phase 1B 7 homeownership units. HABC received HUD approval for the demolition of 74 units. Demolition to commence in Spring of 2018. Condition of other properties will be monitored.	HABC

Community	AMP Nos.	*Non-Dwelling Units	*PIC ACC Units - January 2018	*Asset Management	**Other Units	Development Activities	Capital Improvement Activities	Demolition/Dispo Activities	Management
Somerset Homes	MD002000010	0	0	0	0	This site is part of the CNI Application referred to above under Perkins Homes		HABC will seek HABC Board of Commissioners approval of the activity in April 2018 and will submit a disposition application to HUD in May 2018.	HABC
Cherry Hill Homes	MD002000011	1	1281	0	0	Possible redevelopment of vacant land for mixed income/use development.	See Capital Program - EPC implemented.	N/A	HABC
Brooklyn Homes	MD002000021	1	482	0	0	None	See Capital Program - EPC implemented.	N/A	HABC
Westport Homes	MD002000022	0	200	0	0	None	See Capital Program - EPC implemented	N/A	HABC
Mount Winans	MD002000022	0	52	0	0	None	See Capital Program; Potential EPC site.	N/A	HABC
Rosemont	MD002000031	1	106	0	0	Strategic Planning Process to address future plans for this site. Feasibility study for potential RAD conversion will be performed.	See Capital Program; Potential EPC site.	N/A	HABC
Dukeland	MD002000031	0	30	0	0	Strategic Planning Process to address future plans for this site. Feasibility study for potential RAD conversion will be performed.	See Capital Program; Potential EPC site.	N/A	HABC
Van Story Branch, Sr., Apts.	MD002000041	0	357	0	0	Property approved for Phase 2 Rental Assistance Demonstration Program	See Capital Program	RAD Disposition	HABC
Somerset Court Ext.	MD002000042	0	60	0	0	Property approved for Phase 2 Rental Assistance Demonstration Program	See Capital Program	RAD Disposition	HABC
Monument East	MD002000043	0	170	0	0	Property approved for Phase 2 Rental Assistance Demonstration Program	See Capital Program	RAD Disposition	HABC
Rosemont Towers	MD002000070	0	203	0	0	Property approved for Phase 2 Rental Assistance Demonstration Program	N/A	RAD Disposition	HABC
Charles K. Anderson	MD002000073	0	0	0	0	Possible redevelopment of vacant land for mixed income/use development.	N/A	N/A	HABC
Arbor Oaks	MD002000101	0	62	0	150	Property approved for Phase 2 Rental Assistance Demonstration Program	See Capital Program	RAD Disposition	Private Ownership, Private Management

Community	AMP Nos.	*Non-Dwelling Units	*PIC ACC Units - January 2018	*Asset Management	**Other Units	Development Activities	Capital Improvement Activities	Demolition/Dispo Activities	Management
Monastery Gardens	MD002000102	0	11	0	26	26 Floater Units - Feasibility study for potential RAD conversion will be performed.	See Capital Program	N/A	Private Ownership, Private Management
Midtown (Scattered Sites Units)	MD002000103	0	35	0	0	N/A	Capital improvement schedule from Replacement Reserves and other sources.	N/A	HABC
Montpelier	MD002000104	0	13	0	0	Feasibility study for potential RAD conversion will be performed.	See Capital Program	N/A	HABC Owned/Private Management
The Townes at The Terraces	MD002000106	1	203	0	100	Property approved for Phase 2 Rental Assistance Demonstration Program	See Capital Program	N/A	Private Ownership, Private Management
Uptown Apartments	MD002000108	0	37	0	0	N/A	Capital improvement schedule from Replacement Reserves and other sources.	N/A	HABC
Stricker Street (Scattered Sites Units)	MD002000109	0	25	0	0	N/A	Capital improvement schedule from Replacement Reserves and other sources.	N/A	HABC
Heritage Crossing	MD002000111	0	75	0	185	Property approved for Phase 2 Rental Assistance Demonstration Program	None	N/A	Private Ownership, Private Management
West Hills Square	MD002000113	0	11	0	98	Strategic Planning Process to address future plans for this site. Feasibility study for potential RAD conversion will be performed.	None	N/A	Private Ownership, Private Management
Albemarle Square Phase I Rental	MD002000114	0	93	0	31	HOPE VI project is complete and fully occupied - 31 Tax Credit Units. Feasibility Study for potential RAD conversion will be performed.	None	N/A	Private Ownership, Private Management
Albemarle Square Phase II Rental	MD002000114	0	37	0	166	HOPE VI project is complete - 145 Homeownership and 21 Tax Credit Units. Feasibility Study for potential RAD conversion will be performed.	None	N/A	Private Ownership, Private Management
St. Ambrose (Scattered Sites Units)	MD002000116	0	30	0	None	N/A	None	N/A	Private Ownership, Private Management
Reservoir Hill	MD002000117	0	40	0	24	24 Tax Credit Units - Feasibility Study for potential RAD conversion will be performed.	See Capital Program	N/A	Privately Owned/Private Management

Community	AMP Nos.	*Non-Dwelling Units	*PIC ACC Units - January 2018	*Asset Management	**Other Units	Development Activities	Capital Improvement Activities	Demolition/Dispo Activities	Management
Homes for Arundel (Scattered Sites/Thompson)	MD002000118	0	51	0	0	Property approved for Phase 2 Rental Assistance Demonstration Program	See Capital Program	RAD Disposition	Private Ownership/Private Management
Sharp-Leadenhall Scattered Sites	MD002000119	0	23	0	8	8 Tax Credit Units - Feasibility Study for Potential RAD conversion will be performed.	None	N/A	Private Ownership/Private Management
Barclay Scattered Sites including Homewood House	MD002000121	0	53	0	176	All Rental phases are complete. Homeownership phases I and II are complete. Additional homeownership phases are in pre development	None	Mixed finance disposition	Private Ownership/Private Management
Thompson 22	MD002000123	0	22	0	0	None	See Capital Program	N/A	HABC
Scattered Sites	MD002000200	0	212	0	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 2018/ FY 2019. All scattered site AMPs may be affected by the disposition activity. Viability assessments are on-going. HABC continues to work with the City consistent with the City's Consolidated Plan.	HABC
Scattered Sites Units	MD002000201	0	197	0	None	See Amp 200	See Capital Program; Potential EPC site.	See Amp 200	HABC
Scattered Sites (includes Albert Spencer, Carey House, Laurens House)	MD002000202	0	272	0	None	See Amp 200	See Capital Program; Potential EPC site.	See Amp 200	HABC
Scattered Sites (Includes Oswego Mall)	MD002000203	0	371	0	None	See Amp 200	See Capital Program; Potential EPC site.	See Amp 200	HABC
Albermale Square Phase III Rental	MD002000204	0	4	0	None	HOPE VI project is complete-2 Lease purchase units	None	N/A	HABC
Scattered Sites - Bailey UFAS Units	MD002000205	0	34	0	0	Project is complete. Number of units will modified. Three (3) units currently sitting in AMP 206.	None	N/A	HABC

Community	AMP Nos.	*Non-Dwelling Units	*PIC ACC Units - January 2018	*Asset Management	**Other Units	Development Activities	Capital Improvement Activities	Demolition/Dispo Activities	Management
Scattered Sites (Preston Street)	MD002000206	0	9	0	None	These units will be moved to existing AMP 201 and 205 pending HUD adjustments.	See Capital Program; Potential EPC site.	See Amp 200	HABC
Homes for Arundel (Scattered Sites/Thompson)	118A	0	7	0	0	Property approved for Phase 2 Rental Assistance Demonstration Program	None	RAD Disposition	Private Ownership/Private Management
Homes for Arundel (Scattered Sites/Thompson)	9-118	0	1	0	0	This unit is a homeownership unit that will be removed from inventory.	None	N/A	Homeownership Unit
Orchard Ridge. Formerly Claremont Homes	N/A	0	0	0	374	All rental Phases are complete. Homeownership phases are complete except for 28 lots.	N/A	Phase 1, 2, 3,4 and 5: mixed finance disposition.	Private Ownership/Private Management
Allendale	MD002000075	0	0	164	0	RAD Transaction closed in November 2015	N/A	N/A	Private Ownership, Private Management
Bel-Park Tower		0	0	253	0	RAD Transaction closed in November 2015	N/A	N/A	Private Ownership, Private Management
B. E. Mason, Sr., Apts.		0	0	223	2	RAD Transaction closed in November 2015 - Two (2) affordable rental units were added during the RAD renovations.	N/A	N/A	Private Ownership, Private Management
The Brentwood		1	0	150	0	RAD Transaction closed in December 2015	N/A	N/A	Private Ownership, Private Management
Hollins House		0	0	130	0	RAD Transaction closed in November 2015	N/A	N/A	Private Ownership, Private Management
Lakeview Tower and Lakeview Towers Ext.		0	0	302	0	RAD Transaction closed in November 2015	N/A	N/A	Private Ownership, Private Management
Wyman House		0	0	168	7	RAD Transaction closed in December 2015 - Seven (7) affordable units were added during the RAD renovations.	N/A	N/A	Private Ownership, Private Management
Primrose Place		0	0	125	0	RAD Transaction closed in February 2016	N/A	N/A	Private Ownership, Private Management

Community	AMP Nos.	*Non-Dwelling Units	*PIC ACC Units - January 2018	*Asset Management	**Other Units	Development Activities	Capital Improvement Activities	Demolition/Dispo Activities	Management
Pleasant View Gardens		0	0	311	0	RAD Transaction closed in September 2016	N/A	N/A	Private Ownership, Private Management
Govans Manor		0	0	191	0	RAD Transaction closed in November 2016	N/A	N/A	Private Ownership, Private Management
McCulloh Homes Ext. (HRise)		0	0	349	0	RAD Transaction closed in November 2016	N/A	N/A	Private Ownership, Private Management
Chase House		0	0	189	0	RAD Transaction closed in December 2016	N/A	N/A	Private Ownership, Private Management
Ellerslie Apts.		0	0	117	0	RAD Transaction closed in February 2017	N/A	N/A	Private Ownership, Private Management
Broadway Overlook	MD002000112	0	0	23	109	23 RAD LTA Units, 109 units (61 Non-LTA RAD Units and 48 Affordable Rental Units) - RAD Transaction closed in November 2017.			Private Ownership, Private Management
Hillside Park		0	0	4	90	26 RAD LTA Units, 90 units (26 Non-LTA RAD Units and 64 Affordable Rental Units) - RAD Transaction closed in December 2017	N/A	N/A	Private Ownership, Private Management
Terrace Senior Building		0	0	4	84	4 RAD LTA Units, 84 Units (43 Non-LTA RAD units and 41 Affordable Rental Units) - RAD Transaction closed in December 2017	None	N/A	Private Ownership, Private Management
Barrister Court Apt.		0	0	32	0	None	Capital improvement schedule from Replacement Reserves and other sources.	N/A	HABC Owned / Private Management
Indecco		0	0	45	0	None	Capital improvement schedule from Replacement Reserves and other sources.	N/A	HABC Owned / Private Management
Norman Lohn House		0	0	12	0	None	Capital improvement schedule from Replacement Reserves and other sources.	N/A	HABC Owned / Private Management

Community	AMP Nos.	*Non-Dwelling Units	*PIC ACC Units - January 2018	*Asset Management	**Other Units	Development Activities	Capital Improvement Activities	Demolition/Dispo Activities	Management
Somerset Chase		0	0	22	0	None	Capital improvement schedule from Replacement Reserves and other sources.	N/A	HABC Owned / Private Management
Maxwell III		0	0	20	0	HABC is working with the State to seek approval for the replacement of distressed units at Maxwell with existing HABC units.	Capital improvement schedule from Replacement Reserves and other sources.	Building is vacant. Potential demolition being considered.	HABC Owned / Private Management
Irvington Place		0	0	41	0	None	Capital improvement schedule from Replacement Reserves and other sources.	N/A	HABC Owned / Private Management
West Lexington Street		0	0	44	0	None	Capital improvement schedule from Replacement Reserves and other sources.	N/A	HABC Owned / Private Management
Bailey 10		0	0	0	10	HABC will acquire 10 scattered site units as part of the Bailey Consent Decree	N/A	N/A	TBD
Hollander Ridge		0	0	0	100	BAHD will acquire up to 100 scattered site units as part of the Thompson Settlement Agreement. This project is approved for Phase 2 Rental Assistance Demonstration Program.	N/A	N/A	TBD
TOTALS	Total	16	8,250	2,919	1,740				

*Non-Dwelling , PIC and Asset Management Units require HABC management and oversight.

**Other Units reflect Affordable Units as a result of HABC Transaction and Redevelopment Projects

Appendix C:
Cost Allocation Methodology & Local Asset
Management Plan

Comparison of HABC Indirect Rates For FY13 - FY18

	<u>FY13</u>	<u>FY14</u>	<u>FY15</u>	<u>FY16</u>	<u>Prelim Forecast FY17</u>	<u>FY18</u>	<u>Annual Change</u>
Total Indirect Costs	14,543,570	13,922,270	14,057,593	14,792,510	13,190,293	13,375,010	
Total Direct Costs	121,968,305	115,918,787	111,130,377	118,371,361	92,838,964	101,868,252	
Indirect Rate	11.92%	12.01%	12.65%	12.50%	14.21%	13.13%	

COCC Cut Needed **1,602,217**

11%

Central Calculations

	<u>FY13</u>	<u>FY14</u>	<u>FY15</u>	<u>FY16</u>	<u>Prelim Forecast FY17</u>	
COCC Budgets	14,543,570	13,922,270	14,057,593	14,792,510	12,573,634	13,375,010
Frontline Budgets	8,570,489	7,424,972	7,316,122	7,131,606	6,061,865	6,235,525
Total Central	23,114,059	21,347,243	21,373,716	21,924,116	18,635,499	19,610,535
Site Budgets	73,270,547	70,803,281	62,088,723	74,373,383	71,873,383	68,576,670

COCC Share	20%	20%	23%	20%	18%	20%	13,484,445 @20%
Total Central Share	32%	30%	34%	29%	26%	29%	22,630,301 @33%

0%

Cuts needed in FY17 to maintain approx allocations

HABC Proposed Cost All

<u>Direct</u>	OFR <u>Treatment</u>	<u>FY16</u>	<u>FY17</u>	<u>Change</u>
Sites (LIPH)	Dir	65,498,228	59,957,533	-8%
Sites PVT	Dir	8,875,155	7,542,780	-15%
Sites (CFP hard-includes ECI)	Dir	22,888,814		-100%
Sites (CFP soft - includes ECI)	Dir	4,981,813	1,856,453	-63%
Sites - Special Projects	Dir	-		
EPC Costs (Hard)	Dir	-		
EPC Soft	Frontline	896,086	732,467	
Crews	COCC	3,859,816	2,445,344	-37%
HCVP HAP	Dir	193,733,380		-100%
HCVP Admin	Dir	13,037,765	8,341,700	-36%
Development Hard/HOPE VI	Dir	9,329,477		-100%
Development Soft	Mixed	2,266,490	870,211	-62%
DHCD Hard	Dir	-		
DHCD Soft	Mixed	5,853,709	5,600,841	-4%
RAB	Dir	179,544	188,119	5%
Res Serv - LIPH	Frontline	2,222,291	1,746,255	-21%
Res Serv - Grants	Frontline	1,823,823	1,208,096	-34%
F&A Frontline		-		
HABCO Hard	Dir	-		
HABCO Soft	Frontline	1,289,418	1,177,689	-9%
Hsg. Applic.	Frontline	1,031,279	1,129,682	10%
Hsg. Ops. (dir)	Frontline	3,012,560	3,234,875	7%
Homnrshp	Frontline	36,394	-	
Legal, Lease enforcement	Frontline	-	-	
Relocation	Frontline	557,597	525,902	-6%
Work Order Ctr.	Frontline	271,484	-	-100%
Fund 113	Dir	1,677,909	1,795,439	7%
Undesignated/Legacy		1,000,000	953,621	-5%
Anticipated front line cuts		-	-	
Subtotal Direct		344,323,032	99,307,007	-71%
<u>Less: Non-Relevant Expenses</u>				
Hard Cost (Devel, HABCO)		32,218,291		-100%
HAP		193,733,380		-100%
Debt Service		-		
DHCD Hard cost		-		
RAD Deduct (out in 18) *		6,468,044	6,468,044	
Subtotal Direct		111,903,317	92,838,964	-17%
		<u>Total Direct</u>		<u>Change</u>
Low Rent		80,076,304	71,256,068	-11%
CFP/RHF		4,981,813	1,856,453	-63%
HCVP		13,037,765	8,341,700	-36%
Devel		2,266,490	870,211	-62%
HABCO		1,289,418	1,177,689	-9%
DHCD		5,853,709	5,600,841	-4%

Grants	1,823,823	1,208,096	-34%
EPC	896,086	732,467	-18%
Biz Activities	1,677,909	1,795,439	7%
	111,903,317	92,838,964	-17%

Indirect

Admin Services	COCC	456,013	479,364	5%
Audits	COCC	153,103	137,473	-10%
Budgets	COCC	436,284	370,544	-15%
CFO	COCC	1,962,112	958,957	-51%
Agency Wide	COCC			
Communications	COCC	448,886	465,812	4%
Dep Exec Director	COCC	411,656	281,624	-32%
Executive Director	COCC	506,256	612,040	21%
Facilities/Bldg. Support	COCC	1,476,723	1,549,578	5%
FHEO	COCC	719,982	670,268	-7%
Finance & Accounting	COCC	1,553,468	1,665,510	7%
HousingStat	COCC	-		
Human Resources	COCC	1,555,132	1,909,232	23%
IT	COCC	2,699,237	2,566,399	-5%
Inspector General	COCC	551,192	577,366	5%
Legal - attorneys	COCC	1,257,617	1,329,779	6%
Procurement	COCC	604,850	616,347	2%
Legacy costs	COCC			

Anticipated Cuts for FY18 (1,000,000)

Subtotal Indirect 14,792,510 13,190,293 -11%

Indirect Rate 13.2% 14.2%

Program totals (Dir + Ind) 126,695,828 106,029,257

Indirect Cost Rate (I/D) - blended

TOTAL 359,115,542 112,497,300

Reallocation of non-allocable overhead

Total Indirect Charges 14,792,510 13,190,293

Total Program Indirect Rate

Tot Exp. per FY17 Revised Budget 358,029,042 113,497,300

Overall Proof	359,115,542	113,497,300	
Variance	(1,086,500)	-	0.00%

* Assumes all but 4 RAD sites have closed and are out of HABC's budget prior to FY18 per RAD closing schedule, but with some

Presentation of Location of LIPH Costs - FY16-FY 8

<u>Cost Location</u>	<u>FY16 Budget</u>	<u>FY16 Share</u>	<u>FY17 Budget</u>	<u>FY17 Share</u>
AMPS Direct	74,373,383	69%	67,500,313	72%
Front Lines	7,850,526	7%	6,035,302	6%
<u>Indirects</u>	<u>25,949,460</u>	<u>24%</u>	<u>19,884,299</u>	<u>21%</u>
Total LIPH	108,173,369	100%	93,419,914	100%

MTW PLAN - ATTACHMENT A

HABC Proposed Cost Allocation Methodology - FY 2018

Calculation of Indirect Cost Rate

Version 1 - Preliminary

<u>Share</u>	<u>MTW</u>	<u>Non-MTW</u>	<u>OH Limit</u>	<u>OH shortfall</u>	<u>Comments</u>
53%	59,957,533				
7%	7,542,780				
0%					
2%	1,856,453				
0%	-				
0%	-	-			
1%	732,467	-			
2%	2,445,344	-			
0%	-	-			
7%	8,289,391	52,309			
0%	-				
1%	870,211				
0%	-	-			
5%	-	5,600,841			
0%	188,119	-			
2%	1,746,255				
1%	-	1,208,096	60,352	60,457	Likely charge to AMPs
0%	-	-			
0%	-	-			
1%	-	1,177,689			
1%	1,129,682				
3%	3,234,875				
0%	-				
0%	-				
0%	525,902				
0%	-				
2%	-	1,795,439			
1%	931,954	21,667			
0%	-				
88.3%	89,450,966	9,856,041	99,307,007		
	90%	10%			
	-	-			
	-	-			
	-	-			
	-	-			
	6,468,044	-			
	82,982,923	9,856,041	92,838,964		
	89%	11%			
	<u>MTW Direct</u>	<u>Non-MTW Dir</u>	<u>MTW Indir</u>	<u>Non-MTW Ind</u>	<u>Total Program Cost (Direct + Indirect)</u>
	71,234,401	21,667	10,181,236	2,945	81,440,249
	1,856,453	-	263,760	-	2,120,213
	8,289,391	52,309	1,177,733	7,432	9,526,865
	870,211	-	123,637	-	993,848
		1,177,689		167,323	1,345,012
		5,600,841	-	795,751	6,396,592

	1,208,096	-	60,352	1,268,448
732,467	-	104,600	-	837,067
	1,795,439	-	255,091	2,050,530
82,982,923	9,856,041	11,850,966	1,288,895	105,978,824

- 0.4%
- 0.1%
- 0.3%
- 0.9%
- 0.0%
- 0.4%
- 0.3%
- 0.5%
- 1.4%
- 0.6%
- 1.5%
- 0.0%
- 1.7%
- 2.3%
- 0.5%
- 1.2%
- 0.5%
- 0.0%

11.7% 11,789,975 1,400,318 13,190,293

	80%	9%
14.21%	14.21%	14.21%
100%	101,240,941	11,256,359
	90%	10%
	60,457	(60,457)
14.21%	11,850,432	1,339,861
	14.28%	13.59%

osing schedule, but with some lingering costs into FY18, due to delayed closings.

- FY16-FY18

<u>Est. FY18 Budget</u>	<u>Est. FY18 Share</u>	<u>Assumptions</u>
64,083,883	73%	RADs close, 5% increase
5,431,772	6%	10% cut
17,895,869	20%	10% cut
87,411,524	100%	

Appendix D:
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		FFY of Grant:	
PHA Name:		Capital Fund Program Grant No. MD06P00250116		2016	
Housing Authority of Baltimore City		Replacement Housing Factor Grant No.		FFY of Grant Approval:	
Date of CFP:				2016	
Type of Grant		Total Estimated Cost		Total Actual Cost ¹	
<input type="checkbox"/> Original Annual Statement <input checked="" type="checkbox"/> Performance and Evaluation Report for Period Ending: November 30, 2017		<input checked="" type="checkbox"/> Revised Annual Statement (revision no:9) <input type="checkbox"/> Final Performance and Evaluation Report			
Line	Summary by Development Account	Original	Revised ²	Obligated	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	\$14,585,246	\$14,585,246	\$13,567,731	\$ 5,580,734
16	1495.1 Relocation Costs				
17	1499 Development Activities ⁴	\$ 1,756,459	\$ 1,756,459	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				
20	Amount of Annual Grant: (sum of lines 2 - 19)	\$ 466,264	\$ 466,264	\$ 466,264	\$ 406,773
21	Amount of line 20 Related to LBP Activities	\$16,807,969	\$16,807,969	\$14,033,996	\$ 5,987,507
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 RHHF 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: 2016	
PIA Name: Housing Authority of Baltimore City	Grant Type and Number Capital Fund Program Grant No. MD06P00250116 Date of CFFP: _____	Replacement Housing Factor Grant No:	
Type of Grant <input type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/Emergencies <input checked="" type="checkbox"/> Performance and Evaluation Report for Period Ending: November 30, 2017 <input type="checkbox"/> Revised Annual Statement (revision no:8) <input type="checkbox"/> Final Performance and Evaluation Report		FFY of Grant Approval: 2016	
Line	Summary by Development Account	Total Estimated Cost	Total Actual Cost ¹
		Original	Revised ²
		Obligated	Expended
Signature of Executive Director Janet Abrahams		Signature of Public Housing Director	
Date		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
 Expires 4/30/2011

Part II: Supporting Pages											
PHA Name: Housing Authority of Baltimore City			Grant Type and Number Capital Fund Program Grant No: MD06P00250116 CFFP (Yes/ No): Replacement Housing Factor Grant No:				Federal FFY of Grant: 2016				
Development Number Name/PHA-Wide Activities	General Description of Major Work Categories	Development Account No.	Quantity	Total Estimated Cost		Total Actual Cost			Status of Work		
				Original	Revised ¹	Funds Obligated ²	Funds Expended ²				
1492	Move to Work Capital Activities			\$ 14,585,246	\$ 14,585,246	\$ 9,018,416	\$ 2,584,105				
1499	Move to Work RHF Activities			\$ 1,756,459	\$ 1,756,459	0	0				
1503	RAD Subsidy			\$ 466,264	\$ 466,264	\$ 466,264	\$ 406,773				
	(Breakdown of RAD Subsidy below:)										
MD002000110	Pleasant View Gardens (Family)		201	\$ 59,538	\$ 59,538	\$ 59,538	\$ 59,538				
MD002000110	Pleasant View Gardens (Senior)		110	\$ 19,550	\$ 19,550	\$ 19,550	\$ 19,550				
MD002000023	McCulloh Homes Extension		349	\$ 34,341	\$ 34,341	\$ 34,341	\$ 34,341				
MD002000047	Govans Manor		191	\$ 18,511	\$ 18,511	\$ 18,511	\$ 18,511				
MD002000053	Ellerslie		117	\$ 113,128	\$ 113,128	\$ 113,128	\$ 90,502				
MD002000046	Chase House		189	\$ 221,197	\$ 221,197	\$ 221,197	\$ 184,331				

¹ To be completed for the Performance and Evaluation Report or a Revised Annual Statement.
² To be completed for the Performance and Evaluation Report.

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 III: Implementation Schedule for Capital Fund Financing Program					
PHA Name: Housing Authority of Baltimore City	Federal FFY of Grant: 2016				Reasons for Revised Target Dates ¹
	All Fund Obligated (Quarter Ending Date)		All Funds Expended (Quarter Ending Date)		
Development Number Name/PHA-Wide Activities	Original Obligation End Date	Actual Obligation End Date	Original Expenditure End Date	Actual Expenditure End Date	
MTW Capital Activities	April 3, 2018	TBD	April 3, 2020	TBD	
MTW RHF Activities	October 29, 2019	TBD	October 29, 2021	TBD	
HAP Payment	April 3, 2018	TBD	April 3, 2020	TBD	

¹ Obligation and expenditure end dated can only be revised with HUD approval pursuant to Section 9j of the U.S. Housing Act of 1937, as amended.

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		FFY of Grant:		
PHIA Name:		Capital Fund Program Grant No MD06P00250117		2017		
Housing Authority of Baltimore City		Replacement Housing Factor Grant No:		FFY of Grant Approval:		
Type of Grant		Date of CFFP:		2017		
<input type="checkbox"/> Original Annual Statement <input checked="" type="checkbox"/> Performance and Evaluation Report for Period Ending: November 30, 2017		<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 ²	Obligated	Total Actual Cost ¹	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 I Dwelling Equipment---Nonexpendable					
12	1470 Non-dwelling Structures					
13	1475 Non-dwelling Equipment					
14	1485 Demolition					
15	1492 Moving to Work Demonstration	\$14,719,406	\$ 4,828,807		\$ 116,784	
16	1495 I Relocation Costs	\$ 14,842,558	\$ 931,663	0		
17	1499 Development Activities ⁴	\$ 931,663				
18a	1501 Collateralization of Debt Service paid by the PHIA					
18ba	9000 Collateralization or Debt Service paid Via System of Direct Payment					
19	1503 RAD Subsidy	\$ 49,959	\$ 173,111	\$ 173,111	\$ 12,082	
20	Amount of Annual Grant: (sum of lines 2 - 19)	\$15,824,180	\$15,824,180	\$ 5,001,917	\$ 128,866	
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 RHIF 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: 2017	
PIHA Name: Housing Authority of Baltimore City		FFY of Grant Approval: 2017	
Grant Type and Number Capital Fund Program Grant No. MD06P00250117		Replacement Housing Factor Grant No.:	
Date of CFFP: _____			
<input type="checkbox"/> Reserve for Disasters/Emergencies <input checked="" type="checkbox"/> Revised Annual Statement (revision no:4) <input type="checkbox"/> Original Annual Statement <input type="checkbox"/> Performance and Evaluation Report for Period Ending:		<input type="checkbox"/> Final Performance and Evaluation Report <input type="checkbox"/> Revised ²	
Line	Summary by Development Account	Total Estimated Cost	Total Actual Cost ¹
		Original	Obligated
			Expended
Signature of Executive Director Janet Abrahams		Signature of Public Housing Director	
Date		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
 Expires 4/30/2011

Part II: Supporting Pages											
PHA Name: Housing Authority of Baltimore City			Grant Type and Number Capital Fund Program Grant No: MD06P00250117			CFIP (Yes/ No):			Federal FFY of Grant: 2017		
Development Number Name/PHA-Wide Activities	General Description of Major Work Categories	Development Account No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work			
				Original	Revised ¹	Funds Obligated ²	Funds Expended ²				
1492	Move to Work Capital Activities			\$14,842,558	\$14,719,406	\$ 4,828,807	\$ 116,784				
1499	Move to Work RHF Activities			\$ 931,663	\$ 931,663	0	0				
1503	RAD Subsidy			\$ 49,959	\$ 173,111	\$ 173,111	\$ 12,082				
	(Breakdown of RAD Subsidy below:)										
MD002000112	Broadway Overlook		84	\$ 24,164	\$ 24,164	\$ 24,164	\$ 12,082				
MD002000107	Terrace Senior Building		47	\$ 2,414	\$ 2,414	\$ 2,414	0				
MD002000105	Hillside Park		30	\$ 23,381	\$ 23,381	\$ 23,381	0				
MD002000043	Monument East		170	0	\$ 123,152	\$ 123,152	0				

¹ To be completed for the Performance and Evaluation Report or a Revised Annual Statement.
² To be completed for the Performance and Evaluation Report.

Part III: Implementation Schedule for Capital Fund Financing Program					Federal FFY of Grant: 2017	Reasons for Revised Target Dates
PHA Name: Housing Authority of Baltimore City Development Number Name/PHA-Wide Activities	All Fund Obligated (Quarter Ending Date)		All Funds Expended (Quarter Ending Date)		Original Expenditure End Date	Actual Expenditure End Date
	Original Obligation End Date	Actual Obligation End Date	Original Expenditure End Date	Actual Expenditure End Date		
MTW Capital Activities	August 16, 2019	TBD	August 16, 2021	TBD		
MTW RHF Activities	October 29, 2019	TBD	October 29, 2021	TBD		
HAP Payment	August 16, 2019	TBD	August 16, 2021	TBD		

Obligation and expenditure end dated can only be revised with HUD approval pursuant to Section 9j of the U.S. Housing Act of 1937, as amended.

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

Part I: Summary		FFY of Grant: 2017	
PIIA Name: Housing Authority of Baltimore City		Replacement Housing Factor Grant No:	
Grant Type and Number Capital Fund Program Grant No: Date of CFFP:		FFY of Grant Approval: 2017	
Type of Grant <input type="checkbox"/> Original Annual Statement <input checked="" type="checkbox"/> Performance and Evaluation Report for Period Ending: November 30, 2017		<input type="checkbox"/> Revised Annual Statement (revision no:) <input type="checkbox"/> Final Performance and Evaluation Report	
Summary by Development Account		Total Estimated Cost	
Line		Original	Revised ²
1	Total non-CFFP Funds	\$250,000	0
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	\$ 250,000	0
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		
17	1499 Development Activities ⁴		
18a	1501 Collateralization or Debt Service paid by the PIIA		
18ba	9000 Collateralization or Debt Service paid Via System of Direct Payment		
19	1502 Contingency (may not exceed 8% of line 20)		0
20	Amount of Annual Grant. (sum of lines 2 - 19)	\$250,000	
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	0
25	Amount of line 20 Related to Energy Conservation Measures		
		Obligated	Expended
		0	0
		Total Actual Cost ¹	

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 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		FFY of Grant: 2017	FFY of Grant Approval:
PIA Name: Housing Authority of Baltimore City	Grant Type and Number Capital Fund Program Grant No. Date of CFFP: _____	Replacement Housing Factor Grant No. _____	
Type of Grant <input checked="" type="checkbox"/> Original Annual Statement <input type="checkbox"/> Performance and Evaluation Report for Period Ending: Line Summary by Development Account	<input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Revised Annual Statement (revision no:) <input type="checkbox"/> Final Performance and Evaluation Report	Total Estimated Cost	Total Actual Cost ¹
Signature of Executive Director Janet Abrahams	Date	Original	Revised ²
		Obligated	Expended
		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			
PIHA Name: Housing Authority of Baltimore City		Date of CFP:		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: <u>November 30, 2017</u>	<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	Total Estimated Cost	Revised ¹	Obligated	Total Actual Cost ¹	Expended
Line	Summary by Development Account	Original					
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 Dwelling Equipment - Non-expendable						
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	\$10,579,389	
16	1495 Relocation Costs						
17	1499 Development Activities ⁴	\$2,800,541	\$2,800,541		\$2,800,541	\$2,538,651	
18a	1501 Collateralization or Debt Service paid by the PIHA	\$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	1503 RAD Subsidy						
20	Amount of Annual Grant (sum of lines 2 - 19)	\$17,258,444	\$17,258,444		\$17,258,444	\$16,931,210	
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 CFP Grants for operations.

⁴ RHIF 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					
PHA Name: Housing Authority of Baltimore City		Grant Type and Number Capital Fund Program Grant No: MD06F00250114 Date of CFPP: _____		Replacement Housing Factor Grant No: _____	
<input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Original Annual Statement and Evaluation Report for Period Ending: November 30, 2017 <input checked="" type="checkbox"/> Performance and Evaluation Report for Period Ending: November 30, 2017		<input checked="" type="checkbox"/> Revised Annual Statement (revision no:5) <input type="checkbox"/> Final Performance and Evaluation Report		FFY of Grant: 2014 FFY of Grant Approval: 2014	
Line	Summary by Development Account	Total Estimated Cost	Revised ¹	Obligated	Expended
Signature of Executive Director Janet Abrahams		Signature of Public Housing Director		Date	

Part III: Implementation Schedule for Capital Fund Financing Program					
PHA Name: Housing Authority of Baltimore City Development Number Name/PHA-Wide Activities	All Fund Obligated (Quarter Ending Date)		All Funds Expended (Quarter Ending Date)		Federal FFY of Grant: 2014 Reasons for Revised Target Dates ¹
	Original Obligation End Date	Actual Obligation End Date	Original Expenditure End Date	Actual Expenditure End Date	
MTW Capital Activities	May 13, 2016	February 8, 2016	May 13, 2018	TBD	
MTW RHF Activities	October 29, 2016	June 1, 2016	October 29, 2018	TBD	
MTW Debt Service	May 13, 2016	May 1, 2014	May 13, 2018	June 30, 2015	

¹ Obligation and expenditure end dated can only be revised with HUD approval pursuant to Section 9j of the U.S. Housing Act of 1937, as amended.

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

PHIA Name: **Housing Authority of Baltimore City**

Grant Type and Number: **MD06P00250115** Replacement Housing Factor Grant No: **2015** FFY of Grant: **2015**

Date of CFFP: **November 30, 2012** Revised Annual Statement (revision no:9)

Line	Summary by Development Account	Original	Revised ¹	Obligated	Total Actual Cost ¹	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	\$14,726,155	\$14,726,155	\$14,170,556	
16	1495 1 Relocation Costs					
17	1499 Development Activities ⁴	\$ 2,204,430	\$ 2,204,430	\$ 65,0000	\$0	
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	\$ 577,031	\$ 577,029	\$ 577,029	\$ 577,029	
20	Amount of Annual Grant: (sum of lines 2 - 19)	\$17,507,614	\$17,507,614	\$15,368,184	\$14,747,585	
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 PHIA's with under 250 units in management may use 100% of CFP 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: 2015	
PHIA Name: Housing Authority of Baltimore City		FFY of Grant Approval: 2015	
Grant Type and Number Capital Fund Program Grant No. MD06P00250115		Replacement Housing Factor Grant No:	
Date of CFIP: _____			
<input type="checkbox"/> Reserve for Disasters/Emergencies <input checked="" type="checkbox"/> Performance and Evaluation Report for Period Ending: November 30, 2017		<input checked="" type="checkbox"/> Revised Annual Statement (revision no:9) <input type="checkbox"/> Final Performance and Evaluation Report	
Line	Summary by Development Account	Total Estimated Cost	Total Actual Cost
		Revised ?	Expended
	Original	Obligated	Date
Signature of Executive Director Janet Abrahams		Signature of Public Housing Director	

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 II: Supporting Pages		Grant Type and Number Capital Fund Program Grant No: MD06P00250115 CFFP (Yes/ No): Replacement Housing Factor Grant No:		Federal FY of Grant: 2015				
PHA Name: Housing Authority of Baltimore City		Development Account No.		Total Estimated Cost		Total Actual Cost		Status of Work
Development Number Name/PHA-Wide Activities	General Description of Major Work Categories	Quantity	Original	Revised ¹	Funds Obligated ²	Funds Expended ²		
1492	Move to Work Capital Activities		\$14,726,153	\$14,726,155	\$14,726,155	\$14,170,556		
1499	Move to Work RHF Activities		\$2,204,430	\$ 2,204,430	\$ 65,000	0		
1503	RAD Subsidy		\$577,031	\$ 577,029	\$ 577,029	\$ 577,029		
	(Breakdown of RAD Subsidy below:)							
MD002000033	Lakeview Towers (RAD		\$27,480	\$27,480	\$27,480	\$27,480		
MD002000044	Wyman House		\$183,254	\$183,252	\$183,252	\$183,252		
MD002000051	Bernard E. Mason, Sr., Apt.		\$22,121	\$22,121	\$22,121	\$22,121		
MD002000054	Bel-Park Tower		\$23,325	\$23,325	\$23,325	\$23,325		
MD002000056	The Brentwood		\$166,157	\$166,152	\$166,152	\$166,152		
MD002000074	Hollins House		\$13,060	\$13,060	\$13,060	\$13,060		
MD002000075	Allendale		\$16,548	\$16,548	\$16,548	\$16,548		
MD002000071	Primrose Place		\$125,086	\$125,091	\$125,091	\$125,091		

¹ To be completed for the Performance and Evaluation Report or a Revised Annual Statement.

² To be completed for the Performance and Evaluation Report.

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 III: Implementation Schedule for Capital Fund Financing Program					
PHA Name: Housing Authority of Baltimore City	All Fund Obligated (Quarter Ending Date)		All Funds Expended (Quarter Ending Date)		Federal FFY of Grant: 2015
	Original Obligation End Date	Actual Obligation End Date	Original Expenditure End Date	Actual Expenditure End Date	
MTW Capital Activities	April 12, 2017	February 28, 2017	April 12, 2019	TBD	Reasons for Revised Target Dates ¹
MTW RHF Activities	October 29, 2019	TBD	October 29, 2021	TBD	
RAD Subsidy	April 12, 2017	Nov 30, 2015	April 12, 2019	December 31, 2016	

¹ Obligation and expenditure end dated can only be revised with HUD approval pursuant to Section 9j of the U.S. Housing Act of 1937, as amended.

Appendix E:
The Public Participation Process

Headquarters
1531 S. Edgewood Street, Ste B
Baltimore, Maryland 21227
410-554-8200



1816 12th Street, NW
Washington, DC 20009
202-332-0080

Newspapers
www.afro.com

AFFIDAVIT

State of Maryland
County of Baltimore

Legal Notice

Before me, a Notary Public in and for said city
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

Notice of Comment Period


Signature


Notary Public Signature

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

**HOUSING AUTHORITY OF BALTIMORE CITY
NOTICE OF COMMENT PERIOD FOR THE FY 2019
ANNUAL PLAN AND CERTAIN HABC DOCUMENTS**

The Housing Authority of Baltimore City ("HABC") will hold a public meeting on Thursday March 22nd 2018 in the Auditorium at Pleasant View Gardens, 201 N. Alsquith Street, at 8:00 pm. This address is handicapped-accessible and American Sign Language interpreters will be present.

The purpose of the meeting is to receive comments from HABC residents, community leaders, government officials, and interested members of the public on HABC's proposed Annual Plan for fiscal year 2019, and on changes to HABC's Housing Choice Voucher Administrative Plan, and Public Housing Admissions and Continued Occupancy Policies (ACOP). The proposed documents are available for review and inspection by the public at HABC's Main Office located at 417 E. Fayette Street, Suite 1314, Baltimore, MD 21202. Please call Ms. Joyce Stewart at 410-398-1810 to make arrangements to review the proposed documents. Copies of the proposed documents are 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
400 Cathedral Street
Baltimore, MD 21201

All HABC-Owned Public Housing Development Management Offices

Public Meeting for the FY2019 Annual Plan and the Amended FY 2018 Annual Plan

ATTENDANCE SHEET - SIGN IN, PLEASE

Name	Address	Organization/Development	Phone Number
MONICA WATKINS	417 BRAND BLDG	HABC ABC1	64468
MISSY STON	1835 W. Pratt St	HABC/HCVP	4-2218
Anna Brown	" "	"	4-2213
Suzinde Overbliss	417 E Fayette St	HABC	6-8303
Margaret Wubbel	" "	"	6-5744
Ms. Felicia Lockett	4001 Cleveb Lane Apt 115	RT14A "Basket House Assoc."	443-762-8086
Monell Duitino	11001 Clark's Lane	Grandview/Hillview/Hudson/Hudson/Hudson	240-391-8286
Sharon Peterson	1805 W. Pratt St.	HABC	
David Hoyer	1225 W Pratt St	HABC	42227
Dorrell Lyons	417 E Fayette	Capital Planning	53792
M. Severus Campbell	725 W. Pratt	HABC/ALCUP	42275
Joseph G. Fawcett	6622 Eberle Drive #501 (ZIPS)	Housing Air Neighbors	(410)501-0913
James Overbliss	417 Seaton Ave	HABC	
James D.	417 E Fayette St	HABC	
Michelle Greene	417 E Fayette St	HABC	
Van Galles	" " "	"	
Fanny Kyrus	709 E. EARLE ST	HABC	62967
Nemal Jodh	1225 W. DOTT ST	HABC	
Jeel Behar	1829 N. GUY ST	Housing Management	4103535657
Scarp Henderson	2221 MD Ave, 2nd Flr	Communities United	240-338-2579

**Appendix F
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.08/31/2020)

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		2. Funding Period: 01/01/2018 to 12/31/2018
4. ACC Number: P-110		3. Type of Submission: <input checked="" type="checkbox"/> Original <input type="checkbox"/> Revision No.
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	
7. DUNS Number: 035653435	HUD Use Only	
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 7/1/2016	Units Added to ACC (+)	Units Deleted from ACC (-)	ACC Units on 6/30/2017 (=)
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		<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
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
----------	-------------	------------------	-------------------

Part A. Formula Expenses

Project Expense Level (PEL)			
01	PUM project expense level (PEL)		\$477.04
02	Inflation factor		1.03000
03	PUM inflated PEL (Part A, Line 01 times Line 02)		\$491.35
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)		\$60,359
10	Cost of independent audit		\$129,523
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)		\$189,882
17	Total Formula Expenses (Part A, Line 04 plus Line 06 plus Line 16)		\$189,882

Part B. Formula Income			
01	PUM formula income		
02	Resident Paid Utility (RPU) Energy Performance Contract (EPC) Benefit		
03	PUM adjusted formula income (Sum of Part B, Lines 01 and 02)		\$0.00
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)		\$74,854,047
02	Transition funding		\$0
03	Other	0.00	
04	Total Other Formula Provisions (Sum of Part C, Lines 01 through 03)		\$74,854,047

Part D. Calculation of Formula Amount			
01	Formula calculation (Part A, Line 17 minus Part B, Line 04 plus Part C, Line 04)		\$75,043,929
02	Cost of independent audit (Same as Part A, Line 10)		\$129,523
03	Formula amount (Greater of Part D, Lines 01 or 02)		\$75,043,929

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):

Please see the support excel file to obtain the value for Part C line 01

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 Janet Abrahams, Executive Director

Signature of Authorized HUD Representative & Date:

x

CY18

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

Part A - Project Expense Level Funding

Line 1	Calendar Year 2017 Project Expense Level	46,254,192	
Line 2	Inflation Factor (est.)	1.0300	
Line 4	Calendar Year 2018 Project Expense Level Funding		47,641,818

Part A - Utility Expense Level Funding

	Calendar Year 2017 Utilities Expense Level	46,962,622	
	Inflation Factor (est.)	1.0537	
Line 6	Calendar Year 2018 Utilities Expense Level Funding		49,484,515

Total MTW Add-On Prior to RAD Reductions

97,126,333

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	302
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
MD002000046	CHASE	12/29/2016	189
MD002000053	ELLERSLIE	2/3/2017	117
MD002000107	SR. TOWNES (w. Lex)	11/30/2016	47
MD002000112	BROADWAY	8/11/2017	84

Total CHAP Units	2,801
Total CHAP Unit Months	33,612
Calendar Year 2018 Contract Rent Per Unit	663
Calendar Year 2018 RAD Reductions	(22,272,286)

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

74,854,047

OCAF Calculation

Beginning Contract Rent per unit	609
2014 Operating Cost Adjustment Factor (OCAF) Rate	1.017
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
2017 Operating Cost Adjustment Factor (OCAF) Rate	1.021
Calendar Year 2018 Contract Rent Per Unit	663
2018 Operating Cost Adjustment Factor (OCAF) Rate	
Calendar Year 2019 Contract Rent Per Unit	-
2019 Operating Cost Adjustment Factor (OCAF) Rate	
Calendar Year 2020 Contract Rent Per Unit	-
2020 Operating Cost Adjustment Factor (OCAF) Rate	
Calendar Year 2021 Contract Rent Per Unit	-

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.
HUD will process (19 U.S.C. 1981, 1916)
1012; 31 U.S.C. 3729, 3802)

Name of Authorized Official

Janet Abrahams

Title

Executive Director

Signature

Date (mm/dd/yyyy)

2/1/18

Previous edition is obsolete

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): _____ * Other (Specify): _____
---	---	--

* 3. Date Received: _____	4. Applicant Identifier: _____
-------------------------------------	--

5a. Federal Entity Identifier: MD002	5b. Federal Award Identifier: MD002
--	---

State Use Only:

6. Date Received by State: _____	7. State Application Identifier: MD 7th
---	--

8. APPLICANT INFORMATION:

* a. Legal Name: HOUSING AUTHORITY OF BALTIMORE CITY

* b. Employer/Taxpayer Identification Number (EIN/TIN): 52-6001394	* c. Organizational DUNS: 0356534350000
--	---

d. Address:

* Street1: 417 E Fayette Street
Street2: _____
* City: Baltimore
County/Parish: _____
* State: MD: Maryland
Province: _____
* Country: USA: UNITED STATES
* Zip / Postal Code: 21202-3416

e. Organizational Unit:

Department Name: FISCAL OPERATIONS	Division Name: CFO
---	---------------------------

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

Prefix: Mrs.	* First Name: Sieglinde
Middle Name: A	
* Last Name: Chambliss	
Suffix: _____	

Title: Chief Financial Officer

Organizational Affiliation: _____

* Telephone Number: 410-396-8303	Fax Number: _____
---	--------------------------

* 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.):

Add Attachment

Delete Attachment

View Attachment

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

Public Housing Project Administration and Maintenance under the Operating fund Program 24 CFR 990

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.

17. Proposed Project:

* a. Start Date:

* b. End Date:

18. Estimated Funding (\$):

* a. Federal	<input type="text" value="75,043,929.00"/>
* b. Applicant	<input type="text" value=""/>
* c. State	<input type="text" value=""/>
* d. Local	<input type="text" value=""/>
* e. Other	<input type="text" value=""/>
* f. Program Income	<input type="text" value=""/>
* g. TOTAL	<input type="text" value="75,043,929.00"/>

*** 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

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 G:
Summary of Proposed Changes to the Thompson
Special Administrative Plan

APPENDIX G
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 G

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 H:
Summary of Proposed Changes to
The Housing Choice Voucher Administrative Plan**

APPENDIX H
FY2019 HCVP Administrative Plan Amendments

FY2018 HCVP Admin Plan CURRENT POLICY	Page #	FY2019 HCVP Admin Plan AMENDMENTS PROPOSED POLICY
--	-----------	--

Chapter 2: Eligibility for Admission

<p><u>2.1 INTRODUCTION</u></p> <p>This Chapter defines HABC criteria for admission and denial of admission to the program. The policy of HABC is to strive for objectivity and consistency in applying these criteria to evaluate the eligibility of applicants. HABC staff will review the information provided by the applicant carefully and without regard to factors other than those defined in this Chapter.</p>	2-1	<p>Revise language:</p> <p>This Chapter defines HABC criteria for admission and denial of admission to the program.... HABC staff will review the information provided by the applicant carefully and without regard to factors other than those defined in this Chapter....</p>
<p><u>2.2 ELIGIBILITY FACTORS</u></p> <p>...HUD eligibility criteria are:</p> <ul style="list-style-type: none"> • ... • An applicant must furnish Social Security Numbers (SSN) for all family members. Verification of SSNs are required for all members aged six years and older in accordance with 24 CFR Part 5, Subpart B. • ... 	2-1	<p>HUD regulations have been updated to require all applicants and participants as per 24 CFR Part 5, Subpart B § 5.216 Disclosure and verification of Social Security and Employer Identification Numbers.</p> <ul style="list-style-type: none"> • An applicant must furnish Social Security Numbers (SSN) for all family members. Verification of SSNs are required for all members aged six years and older in accordance with 24 CFR Part 5, Subpart B.
<p><u>2.2 ELIGIBILITY FACTORS</u></p> <p>Final determination of eligibility is made after verification of the information provided on the application as updated to reflect the current status of the applicant...</p> <p>Changes to the application may be updated online through the HCVP Applicant Portal (https://baltimore.applicants4housing.com).</p> <p>Reasons for denial of admission are addressed in the “Denial or Termination of Assistance” chapter. These reasons for denial constitute additional admission criteria.</p>	2-2	<p>Clarifying and removing unnecessary language:</p> <p>Final determination of eligibility is made after verification of the information provided on the application <i>has been verified as-and</i> updated to reflect the <i>applicant’s</i> current status of the applicant...</p> <p>Changes to the application may be updated online through the HCVP Applicant Portal (https://baltimore.applicants4housing.com). Reasons for denial of admission are addressed in the “Denial or Termination of Assistance” chapter. These reasons for denial constitute additional admission criteria.</p>
<p><u>2.3 FAMILY COMPOSITION</u></p> <p>Family as defined to HUD includes but is not limited to the following:</p> <ul style="list-style-type: none"> • ... • A non-elderly person with a disability family; • The remaining member of a participant family who was listed on the lease; 	2-2	<p>Added a bullet to accurately reflect definition of family:</p> <ul style="list-style-type: none"> • ... • A non-elderly person with a disability family; • <i>Any remaining eligible member(s) of the applicant family who was listed on the initial HCVP application;</i> • The remaining member of a participant family who was listed on the lease; • ...

Chapter 2: Eligibility for Admission (Continued)

--	--	--

FY2018 HCVP Admin Plan CURRENT POLICY	Page #	FY2019 HCVP Admin Plan AMENDMENTS PROPOSED POLICY
--	-----------	--

<p><u>2.3 FAMILY COMPOSITION</u></p> <p>2.3.6. Elderly Person An elderly person, is a person who is at least sixty-two (62) years of age.</p>	2-4	<p>Clarifying “as defined by HUD” – as State and local definitions of elderly may vary (55-65 years old).</p> <p>2.3.6. Elderly Person An elderly person, <i>as defined by HUD</i>, is a person who is at least sixty-two (62) years of age.</p>
<p><u>2.3 FAMILY COMPOSITION</u></p> <p>2.3.9. Live-In Aides</p> <p>...Relatives are not automatically exclude from being live-in aides. To be a live-in aide, relatives must meet all of the elements in the live-in aide definition described above...</p> <p>...Any person proposed as a live-in aide, including relatives, must pass HABC’s eligibility and screening criteria...</p> <p>...HABC will require the live-in aide to execute an acknowledgement form in which the live-in aide agrees to abide by the terms and conditions of occupancy set forth in the lease agreement...</p> <p>...At any time, HABC will refuse to approve a particular person as a live-in aide or may withdraw such approval if:</p> <ul style="list-style-type: none"> • ... • The person commits drug-related criminal activity, violent, or other serious criminal activity; or • ... 	2-4 to 2-5	<p>Add/modify language to clarify current HCVP procedure:</p> <p>2.3.9. Live-In Aides</p> <p>...Relatives are not automatically exclude from being live-in aides; <i>however, requests to add relatives as live-in aides must be approved by the Deputy Chief for HCVP, or designee.</i> To be a live-in aide, relatives must meet all of the elements in the live-in aide definition described above...</p> <p>...Any person proposed as a live-in aide, including relatives, must <i>be approved by the owner of the unit, and</i> pass HABC’s eligibility and screening criteria...</p> <p>...HABC will require the live-in aide to execute an acknowledgement form in which the live-in aide agrees to abide by the terms and conditions of <i>HCVP’s family obligations-occupancy set forth in the lease agreement</i>...</p> <p>...At any time, HABC will refuse to approve a particular person as a live-in aide or may withdraw such approval if:</p> <ul style="list-style-type: none"> • ... • The person commits drug-related eriminal activity, violent, or other serious criminal activity; or • ...

Chapter 2: Eligibility for Admission (Continued)

FY2018 HCVP Admin Plan CURRENT POLICY	Page #	FY2019 HCVP Admin Plan AMENDMENTS PROPOSED POLICY
--	-----------	--

<p><u>2.3 FAMILY COMPOSITION</u></p> <p>2.3.10. Guests</p> <p>A guest is defined as a person temporarily staying in the unit with the consent of the participant or other member of the household who has express or implied authority to so consent on behalf of the participant.</p> <p>The participant must request HABC approval prior to guests arriving who will be in the unit in excess of fourteen (14) days in any fifty-two (52) week period, which shall be calculated from the month designated by HABC for the participant’s annual, biennial, or triennial review, whichever applies.</p> <p>Guests who remain beyond this period shall be considered unauthorized occupants, and their presence constitutes a violation of Family Obligations (for more information on Family Obligations, see Chapter 15, Section 15.5). Live-in aides may not have overnight guests.</p>	2-5	<p>Add/modify language to update definition:</p> <p>2.3.10. Guests</p> <p>A guest is defined as a person temporarily staying in the unit with the consent of the participant or other member of the household who has express or implied authority to so consent on behalf of the participant <i>and is not considered part of the applicant household. For more information on guests, please see Chapter 15, Section 15.4.8.</i></p> <p>The participant must request HABC approval prior to Guests arriving who will be in the unit in excess of fourteen (14) consecutive days, or for a total of ninety (90) days in a twelve (12) month period without HABC approval in any fifty two (52) week period. <i>For any guest who has income and who remains in the unit for longer than the specified time frame, which shall be calculated from the month designated by HABC will include that income in the calculation of total family income. HABC will re-determine the effective date for the participant’s annual, biennial, or triennial review, whichever applies.</i></p> <p>Guests who remain beyond this period shall be <i>are</i> considered unauthorized occupants, and their presence which constitutes a violation of Family Obligations (for more information on Family Obligations, see Chapter 15, Section 15.5) <i>and may result in termination of assistance.</i> Live-in aides may not have overnight guests.</p>
<p><u>2.3 FAMILY COMPOSITION</u></p> <p>2.3.11. Visitors</p> <p>NO CURRENT DEFINITION WITHIN THIS CHAPTER</p> <p>COPIED DEFINITION FROM CHAPTER 6, SECTION 6.6.8</p>	2-5	<p>Add section to provide definition in appropriate chapter:</p> <p>2.3.11. Visitors</p> <p><i>A visitor is defined as a person temporarily visiting the unit with the consent of the participant or other member of the household who has NO express or implied authority to so consent on behalf of the participant. Visitors are not considered a part of the applicant household. Please see Chapter 15, Section 15.4.9 for more information.</i></p> <p><i>Any person, who has been in the unit more than fourteen (14) consecutive days without HABC approval, or a total of ninety (90) days in a 12-month period, will be considered to be living in the unit as an unauthorized household member.</i></p> <p><i>Determination of the unauthorized status will include any of the following:</i></p> <ol style="list-style-type: none"> <i>a. Absence of evidence of any other address will be considered verification that the visitor is a member of the household.</i> <i>b. Statements from neighbors and/or the landlord will be considered in making the determination.</i> <i>c. Use of the unit address as the visitor's current residence for any purpose that is not explicitly temporary shall be construed as permanent residence.</i>

FY2018 HCVP Admin Plan CURRENT POLICY	Page #	FY2019 HCVP Admin Plan AMENDMENTS PROPOSED POLICY
--	-----------	--

<p><u>2.3 FAMILY COMPOSITION</u></p> <p>2.3.13. Joint Custody of Dependents</p> <p>...When more than one participant are claiming the same dependent as family members, the family with primary custody at the time of the initial examination or reexamination will be able to claim the dependents.</p>	2-6	<p>Correct grammar:</p> <p>...When more than one participant are claiming <i>claims</i> the same dependent(s) as <i>a</i> family members, the <i>family participant</i> with primary custody at the time of the initial examination or reexamination will be able to claim the dependent(s).</p>
<p><u>2.4 INCOME LIMITATIONS</u></p> <p>...Families whose annual income exceeds the income limit will be denied admission and offered an informal review.</p>	2-7	<p>Clarifying language – applicants may request informal reviews; participants may request informal hearings:</p> <p>...Families whose annual income exceeds the income limit will be denied admission and offered <i>may request</i> an informal review.</p>
<p><u>2.5 MANDATORY SOCIAL SECURITY NUMBERS [24 CFR 5.216, 5.218]</u></p> <p>The applicant and all members of the applicant’s household must provide the complete and accurate Social Security Number (SSN) assigned to each household member, and the documentation necessary to verify each SSN for members over the age of six (6) years.</p> <p>Applicants are required to provide verification or signed certifications of SSNs for all family members age six (6) and older within ninety (90) calendar days of voucher issuance, if they have been issued a number by the Social Security Administration (SSA). This requirement does not apply to non-citizens who do not contend they have eligible immigration status.</p> <p>Persons who have not been issued a SSN must sign a certification that they have never been issued a SSN.</p> <p>Persons who disclose their SSN but cannot provide verification must sign a certification and provide verification within ninety (90) calendar days of voucher issuance...</p> <p>Individuals exempt from providing a SSN are:</p> <ul style="list-style-type: none"> • ... • Participants age sixty-two (62) years and older as of January 31, 2012, whose initial determination of eligibility began before January 31, 2010. 	2-8	<p>Modifying language to match current HUD regulations at 24 CFR 5.216 and 5.218</p> <p>The applicant and all members of the applicant’s household must provide the complete and accurate Social Security Number (SSN) assigned to each household member, and the documentation necessary to verify each SSN for members over the age of six (6) years.</p> <p>Applicants are required to provide verification or signed certifications of SSNs for all family members age six (6) and older within ninety (90) calendar days of voucher issuance, if they have been issued a number by the Social Security Administration (SSA). This requirement does not apply to non-citizens who do not contend they have eligible immigration status.</p> <p>Persons who have not been issued a SSN must sign a certification that they have never been issued a SSN.</p> <p>Persons who disclose their SSN but cannot provide verification must sign a certification and provide verification <i>to HABC within ninety (90) calendar days of voucher issuance prior to the execution of the Housing Assistance Payment (HAP) Contract...</i></p> <p>Individuals exempt from providing a SSN are:</p> <ul style="list-style-type: none"> • ... • Participants age sixty-two (62) years and older as of January 31, 2012 <i>2010</i>, whose initial determination of eligibility began before January 31, 2010.

FY2018 HCVP Admin Plan CURRENT POLICY	Page #	FY2019 HCVP Admin Plan AMENDMENTS PROPOSED POLICY
--	-----------	--

--	--	--

Chapter 2: Eligibility for Admission (Continued)

<p><u>2.6 CITIZENSHIP/ELIGIBLE IMMIGRATION STATUS [24 CFR Part 5, Subpart E]</u></p> <p>...HABC will verify the citizenship/immigration status of applicant's when other eligibility factors are determined...</p> <p><i>All members ineligible.</i> Applicant families that include no eligible members are ineligible for assistance. Such families will be denied admission and offered an opportunity for an informal hearing.</p>	2-8	<p>Clarifying language – applicants may request informal reviews; participants may request informal hearings:</p> <p>...</p> <p><i>All members ineligible.</i> Applicant families that include no eligible members are ineligible for assistance. Such families will be denied admission and offered an opportunity for may request an informal hearing.</p>
<p><u>2.8 TENANT SCREENING</u></p> <p>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...</p> <p>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.</p>	2-10	<p>Renamed section <u>“2.8 TENANT SCREENING PROCEDURES”</u></p> <p>HABC will conduct EIV screening for new applicants. An EIV Existing Tenant Search <i>Record</i> will be conducted on minor and adult members to identify applicants who may be receiving federal rental assistance...</p> <p>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 <i>adverse unfavorable</i> status and/or owe money to a PHA or to a landlord as a result of participation in a HCV Program.</p>

Chapter 3: Applying for Admission

<p><u>3.5 APPLICANT STATUS WHILE ON WAITING LIST</u></p> <p>Applicants are required update any changes pertaining to their application or applicant status, including but not limited to household composition, address, and income via in writing to HABC's office. Changes may also be made to applications online via the “Applicant Portal” (aka “the Portal”, or the “online Portal”). The Applicant Portal may be accessed by computer, smart phone, tablet, or via the kiosks physically located at HABC on 1225 W Pratt Street, Baltimore, MD 21223...</p> <p>...Applicants are required to respond within ninety (90) calendar days to requests from HABC to update information on their application and/or to determine if the applicant is still interested in receiving assistance. If communication sent by HABC to an applicant is returned with a forwarding address, HABC will resend the communication to the new address.</p>	3-3	<p>Revise language to reflect online submissions:</p> <p>Applicants are required <i>to</i> update any changes pertaining to their application or applicant status, including but not limited to household composition, address, and income <i>online via in writing to HABC's office. Changes may also be made to applications online via the “Applicant Portal.” (aka “the Portal”, or the “online Portal”).</i>—The Applicant Portal may be accessed by computer, smart phone, tablet, or via the kiosks physically located at HABC on 1225 W. Pratt Street, Baltimore, MD 21223...</p> <p>...Applicants are required to respond within ninety (90) calendar days to <i>all notifications requests</i> from HABC to update information on their application and/or to determine if the applicant is still interested in receiving assistance. If communication sent by HABC to an applicant is returned with a forwarding address, HABC will resend the <i>communication notification</i> to the new address.</p>
--	-----	---

FY2018 HCVP Admin Plan CURRENT POLICY	Page #	FY2019 HCVP Admin Plan AMENDMENTS PROPOSED POLICY
--	-----------	--

--	--	--

Chapter 3: Applying for Admission (Continued)

<p><u>3.5 APPLICANT STATUS WHILE ON WAITING LIST</u></p> <p>3.5.1. Removal from the Waiting List</p> <p>HABC will remove the names of applicants who do not respond in a timely manner to a communication by HABC and cannot be reached by email, mail, telephone, or via the contacts listed on their application. Failure to respond will result in the application being removed from the waiting list. No further action will be taken. No informal review will be offered. The applicant’s failure to respond prevents HABC from making an eligibility determination; therefore no informal review is required. ...</p>	3-3	<p>Revise language to reflect current practice:</p> <p>3.5.1. Removal from the Waiting List</p> <p>HABC will remove the names of applicants who do not respond in a timely manner to a communication by HABC and cannot be reached by email, mail, telephone, or via the contacts listed on their application. Failure to respond will result in the application being removed from the waiting list. No further action will be taken. No informal review will be offered.—The applicant’s failure to respond prevents HABC from making an eligibility determination; therefore no informal review is required. ...</p>
<p><u>3.7 APPLICATION COMPLETION AND INTERVIEW</u></p> <p>After the preference is verified, the applicant will be required to:</p> <ul style="list-style-type: none"> • Complete a Personal Declaration Form prior to the full application interview. • Complete and sign the full application if required... 	3-4	<p>Update language to reflect current practice:</p> <p>After the preference is verified, the applicant will be required to:</p> <ul style="list-style-type: none"> • Complete a Personal Declaration Form prior to the full application interview. • Complete and sign the full application <i>if required...</i> • <i>Complete and sign all HABC required forms.</i>
<p><u>3.7 APPLICATION COMPLETION AND INTERVIEW</u></p> <p>3.7.1. Requirement to Attend Interview</p> <p>...Reasonable Accommodation will be made for persons with a disability who require an advocate or accessible offices, or to have the interview conducted at a location other than HABC’s offices...</p> <p>If an application is denied due to failure to attend the interview, the applicant will be notified in writing that the application has been withdrawn from the waiting list...</p> <p>The head of household and spouse, regardless of age, and all adult members must sign the HUD Form 9886...</p> <p>If HABC determines at or after the interview that additional information or documentation is needed, HABC will request the documentation or information in writing. The applicant will be given ten (10) calendar days to supply the information...</p>	3-4 to 3-5	<p>Update language to reflect current practice:</p> <p>3.7.1. Requirement to Attend Interview</p> <p>...<i>A</i> reasonable accommodation will be made for persons with a disability who require an advocate or accessible offices, or to have the interview conducted at a location other than HABC’s offices...</p> <p>If an application is denied due to failure to attend the interview, the applicant will be notified in writing that the application has been withdrawn from the waiting list...</p> <p>The head of household, and spouse, <i>and co-head</i>, regardless of age, and all adult members must sign the HUD Form 9886...</p> <p>If HABC determines at or after the interview that additional information or documentation is needed, HABC will request the documentation or information in writing. The applicant will be given ten (10) calendar <i>business</i> days to supply the information...</p> <p><u>If an application is denied due to failure to attend the interview, the applicant will be notified in writing that the application has</u></p>

FY2018 HCVP Admin Plan CURRENT POLICY	Page #	FY2019 HCVP Admin Plan AMENDMENTS PROPOSED POLICY
--	-----------	--

[been withdrawn from the waiting list...](#)

Chapter 4: Establishing Preferences and Maintaining the Waiting List

<p>4.1 INTRODUCTION</p> <p>1. ...TBV</p> <p>2. ...PBV</p> <p><i>*The HABC Board approved in August 2014 the use of existing Project-Based waiting list to serve as a bridge until the new Tenant Based waiting list can be promulgated. HCVP can utilize oldest date and time applicants who applied prior to January 1, 2006.</i></p> <p>3. HABC has the option to consider the TBV waiting list open when an applicant is placed on the low-income public housing program, HABC will offer to place the applicant on the TBV waiting list.</p>	<p>4-1</p>	<p>Remove asterisk as there is no more “old” waiting list.</p> <p><i>*The HABC Board approved in August 2014 the use of existing Project Based waiting list to serve as a bridge until the new Tenant Based waiting list can be promulgated. HCVP can utilize oldest date and time applicants who applied prior to January 1, 2006.</i></p> <p><i>3. HABC has the option to consider the TBV waiting list open when an applicant is placed on the low income public housing program, HABC will offer to place the applicant on the TBV waiting list</i></p>
<p>4.3 ORDER OF SELECTION</p> <p>4.3.7. Preference Modification</p> <p>Changes in an applicant’s circumstances while on the waiting list, may affect the family’s entitlement to a preference. Applicants are required to notify HABC in writing when their circumstances change.</p>	<p>4-4</p>	<p>Revise language to reflect online submissions:</p> <p>Changes in an applicant’s circumstances while on the waiting list, may affect the family’s entitlement to a preference. Applicants are required to notify HABC <i>by submitting their changes online via the Applicant Portal. An alternative method or a reasonable accommodation may be requested, in the event a computer is not accessible by the applicant</i> <i>in writing when their circumstances change.</i></p>
<p>4.4 UPDATING THE WAITING LIST</p> <p>Applicants are required to inform HABC online via the Applicant Portal, or through alternative methods of changes in address.</p> <p>HABC’s tenant-based voucher waiting list opened during the period of October 22-30, 2014. HABC anticipated at least 25,000 new pre-applications to be filed. More than 25,000 applications were received; therefore, HABC had to reduce the number of applicants to 25,000 using a computer generated representative random selection....</p> <p>The representative random selection maintained the same percentage of applicants from the preliminary application pool to create a 25,000 household waiting list. HABC’s goal is to issue available tenant based vouchers (not allocated to other set-aside programs or HUD special funded programs), subject to appropriations, according to these percentages....</p> <p>The new list created from this preliminary pre-application process will continue to be utilized until its expiration on January 1, 2020.</p>	<p>4-5</p>	<p>Remove unnecessary language:</p> <p>Applicants are required to inform HABC online via the Applicant Portal, or through alternative methods of changes in address.</p> <p><i>HABC’s tenant-based voucher waiting list opened during the period of October 22-30, 2014. HABC anticipated at least 25,000 new pre-applications to be filed. More than 25,000 applications were received; therefore, HABC had to reduce the number of applicants to 25,000 using a computer generated representative random selection....</i></p> <p><i>The representative random selection maintained the same percentage of applicants from the preliminary application pool to create a 25,000 household waiting list. HABC’s goal is to issue available tenant based vouchers (not allocated to other set-aside programs or HUD special funded programs), subject to appropriations, according to these percentages....</i></p> <p>The new list created from this preliminary pre-application process will continue to be utilized until <i>it has been exhausted or until its expiration on January 1, 2020, whichever comes first.</i></p>

FY2018 HCVP Admin Plan CURRENT POLICY	Page #	FY2019 HCVP Admin Plan AMENDMENTS PROPOSED POLICY
--	-----------	--

--	--	--

Chapter 4: Establishing Preferences and Maintaining the Waiting List (Continued)

<p><u>4.14 SPECIAL HUD FUNDING FOR VASH VOUCHERS</u></p> <p>4.14.1 VASH Graduate Program</p> <p>HABC will receive referrals from the Veterans Affairs (VA) for active participants housed under the VASH Program who have successfully completed case management services as determined by the VA, to receive permanent tenant-based subsidy.</p>	4-9	<p>Revise language to depend on funding availability:</p> <p>HABC will receive referrals from the Veterans Affairs (VA) for active participants housed under the VASH Program who have successfully completed case management services as determined by the VA, to receive permanent tenant-based subsidy, <i>subject to funding availability</i>.</p>
---	-----	--

Chapter 5: Subsidy Standards

<p><u>5.3 PARAMETERS FOR DETERMINATION OF VOUCHER SIZE</u></p> <p>...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>	5-1	<p>Update language to reflect current practice.</p> <p>...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. <i>If the voucher size increases due to a change in family composition, HABC will only increase the voucher size at the time the family receives approval to move into a new unit.</i></p>
<p><u>5.3 PARAMETERS FOR DETERMINATION OF VOUCHER SIZE</u></p> <p>Generally, HABC assigns one bedroom to two people; however, the following guidelines may apply:</p> <ul style="list-style-type: none"> • ... • A single pregnant woman with no other family members must be treated as a two-person family. • ... • Moves with continued assistance for participants who are already on the program, children under the age of four (4) will be required to share one bedroom... • ... • Children of the opposite sex 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;... • Foster children, appropriately documented, will be included... • ... • 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>**A reasonable accommodation may be requested by</p>	5-2	<p>Update standards to reflect current policy:</p> <p>Generally, HABC assigns one bedroom to two people; however, the following guidelines may apply:</p> <ul style="list-style-type: none"> • ... • A single pregnant woman with no other family members must be treated as a two-person family <i>and shall be allocated one bedroom</i>. • ... • Moves with continued assistance for participants who are already on the program, Children under the age of four (4) will be required to share one bedroom... • ... • Children of the opposite sex 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;... • Foster children <i>and children under court awarded custody</i>, appropriately documented, will be included... • ... • 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>**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 or by going online to www.baltimorehousing.org.</p>

FY2018 HCVP Admin Plan CURRENT POLICY	Page #	FY2019 HCVP Admin Plan AMENDMENTS PROPOSED POLICY
--	-----------	--

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 or by going online to www.baltimorehousing.org.		<i>Refer to Chapter 1, Section 1.10 for information on requesting a reasonable accommodation.</i>
--	--	---

Chapter 5: Subsidy Standards (Continued)

5.5 UNIT SIZE SELECTED 5.5.1. Unit Size The unit size shall not exceed the voucher size by more than one bedroom...	5-3	Update language to reflect current policy that voucher size must match unit size: The unit size shall not exceed the voucher size by more than one bedroom...
---	-----	---

Chapter 6: Factors Related to Total Tenant Payment and Family Share Determination

6.1 INTRODUCTION HABC will use the methods as set forth in this Administrative Plan to verify and determine that family income at admission and at annual reexamination is correct. The accurate calculation of Annual Income and Adjusted Income will ensure that families pay the appropriate amount as set forth in HABC Administrative Plan and HUD regulations, as applicable. Once income has been established, HABC will subtract from annual income the deductions for which a family qualifies in order to determine adjusted income. This Chapter defines income, allowable expenses and deductions to be subtracted from income and how the presence or absence of household members may affect the Total Tenant Payment (TTP). The formula for the calculation of TTP is specific and not subject to interpretation. HABC policies in this Chapter address the terms and standards used to assure consistent application of the various factors that relate to the determination of TTP.	6-1	Revising language to reflect current practice: HABC will use the methods as set forth in this Administrative Plan to verify and determine that family income at admission and at annual reexamination is are correct. The accurate calculation of annual income and adjusted income will ensure that families pay the appropriate amount as set forth in HABC Administrative Plan and HUD regulations, as applicable. Once income has been established, HABC will subtract from annual income the deductions for which a family qualifies in order to determine adjusted income. <i>This Chapter defines income, allowable expenses and deductions, total tenant payments, minimum rent, the earned income disregard (EID) for persons with disabilities, contributions and other expenses to be subtracted from income and how the presence or absence of household members may affect the Total Tenant Payment (TTP). The formula for the calculation of TTP is specific and not subject to interpretation. HABC policies in this Chapter address the terms and standards used to assure consistent application of the various factors that relate to the determination of TTP.</i>
---	-----	---

6.3 INCOME AND ALLOWANCES 6.3.1 Annual Income <ul style="list-style-type: none"> • ... • Interest, dividends and other net income of any kind from real or personal property. <ul style="list-style-type: none"> • If the family has net family assets less than \$5,000, annual income shall include the actual income from those assets; • If the family has net family assets in excess of \$5,000, annual income shall include the <u>greater of</u> the actual income derived from all net family assets or a percentage of the value of such assets based on the current passbook savings rate. • ... • Periodic and determinable allowances... <ul style="list-style-type: none"> • Any contribution or gift received every two (2) months or more frequently will be considered a “regular” contribution or gift, 	6-1 to 6-2	Update section # as the “MINIMUM RENT” section was moved to “6.3” and update language to reflect proposed activity for assets and current practice for gift contributions: 6.4 INCOME AND ALLOWANCES 6.4.1 Annual Income <ul style="list-style-type: none"> • ... • Interest, dividends and other net income of any kind from real or personal property. <ul style="list-style-type: none"> • If the family has net family assets less than \$5,000, annual income shall include the actual income from those assets; • If the family has net family assets in excess of \$5,000, annual income shall include the <u>greater of</u> the actual income derived from all net family assets or a percentage of the value of such assets based on the current passbook savings rate. • ... • Periodic and determinable allowances...
--	------------	--

FY2018 HCVP Admin Plan CURRENT POLICY	Page #	FY2019 HCVP Admin Plan AMENDMENTS PROPOSED POLICY
--	-----------	--

<ul style="list-style-type: none"> ... unless the amount is less than \$600 per year. 		<ul style="list-style-type: none"> 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 per year.
--	--	--

Chapter 6: Factors Related to Total Tenant Payment and Family Share Determination (Continued)

<p><u>6.3 INCOME AND ALLOWANCES (Continued)</u></p> <p>6.3.1 Annual Income</p> <p>...Annual income excludes the following:</p> <ul style="list-style-type: none"> ... Amounts received under training programs funded by HUD, including stipends, which do not exceed \$200 per month. Continued Participation only: amounts received under HABC-approved economic self-sufficiency or job training programs, including stipends, provided that the amounts do not exceed \$200 per month and do not continue for a period greater than 12 months. ... Earnings in excess of \$480 for each full-time student who is eighteen (18) years or older and is not the head of household, co-head, or spouse. Adoption assistance payments in excess of \$480 per adopted child. ... 	<p>6-3</p>	<p>Section # changed, as well as all subsequent section #'s.</p> <p><u>6.4 INCOME AND ALLOWANCES</u></p> <p>6.4.1 Annual Income</p> <p>...Annual income excludes the following:</p> <ul style="list-style-type: none"> ... Amounts received under training programs funded by HUD, including stipends, which do not exceed \$200 per month. Continued Participation only: amounts received under HABC-approved economic self-sufficiency or job training programs, including stipends, provided that the amounts do not exceed \$200 per month and do not continue for a period greater than 12 months. ... Earnings in excess of \$480 for each full-time student who is eighteen (18) years or older and is not the head of household, co-head, or spouse. Adoption assistance payments in excess of \$480 per adopted child. ...
<p><u>NEW SECTION – Previously Section 6.7 Income and Allowances</u></p> <p>Adding new language to Averaging Income</p> <p><u>6.7 AVERAGING INCOME</u></p> <p>When annual income cannot be anticipated for a full twelve (12) months, HABC will average known sources of income that vary to compute an annual income. If there are bonuses or overtime that the employer cannot anticipate for the next twelve months, bonuses and overtime received the previous year will be used.</p> <p><u>6.8 MINIMUM INCOME</u></p> <p>There is no minimum income requirement. Families who report zero income are required to undergo an interim re-examination review every one hundred and twenty (120) calendar days and will be required to provide information regarding their means of basic subsistence, such as food, utilities, transportation, etc.</p>	<p>N/A</p>	<p><u>6.4 INCOME AND ALLOWANCES</u></p> <p>6.4.3 Averaging Income</p> <p><u>When annual income cannot be anticipated for a full twelve (12) months (i.e. seasonal income), HABC will average known sources of income that vary to compute an annual income. If there are bonuses or overtime that the employer cannot anticipate for the next twelve months, bonuses and overtime received the previous year will be used.</u></p> <p><i>If there are any changes in the sources used to determine the annualized income, the participant is required to report those changes to HABC within thirty (30) days. Once verified, the income will be recalculated for a full twelve (12) months, and adjusted accordingly.</i></p> <p>6.4.4 Minimum Income</p> <p><u>There is no minimum income requirement. Families who report zero income are required to undergo an interim re-examination review once every twelve (12) months, one hundred and twenty (120) calendar days and will be required to provide information regarding their means of basic subsistence, such as food, utilities, transportation, etc.</u></p>

FY2018 HCVP Admin Plan CURRENT POLICY	Page #	FY2019 HCVP Admin Plan AMENDMENTS PROPOSED POLICY
--	-----------	--

<u>6.5 MINIMUM RENT</u>	6-7	No change to policy; section moved to <u>6.3 MINIMUM RENT</u>
-------------------------	-----	---

Chapter 6: Factors Related to Total Tenant Payment and Family Share Determination (Continued)

<p><u>6.6 DEFINITION OF TEMPORARILY / PERMANENTLY ABSENT</u></p> <p>Permanent and temporary absence has significant impact on a number of HCV assistance aspects including family size determination, subsidy standard determination, and split household and remaining tenants. ... It is the responsibility of the head of household to report changes in family composition. HABC will evaluate absences from the unit using this policy.</p> <p>6.6.10 Reporting Absences to the HABC – moved up 6.6.1.</p> <p>6.6.9 Reporting Additions to Owner and HABC – moved up to 6.6.2.</p>	6-7 to 6-10	<p>Moved definitions of absence to Chapter 15 and added last sentence to first paragraph:</p> <p>Permanent and temporary absence has significant impact on a number of HCV assistance aspects including family size determination, subsidy standard determination, and split household and remaining tenants. ... It is the responsibility of the head of household to report changes in family composition. HABC will evaluate absences from the unit using this policy. <i>See Chapter 15, Section 15.5 for more information on definitions of absent members, family, etc.</i></p> <p>6.6.1 Reporting Absences to the HABC (moved from previous section 6.6.10) – no changes to language</p> <p>Reporting changes in household composition is both a family responsibility and HABC requirement...</p>
<p><u>6.6 DEFINITION OF TEMPORARILY / PERMANENTLY ABSENT</u></p> <p>6.6.9 Reporting Additions to Owner and HABC (moved up to 6.6.2)</p> <p>Reasons to approve additional household members include, but are not limited to:</p> <ul style="list-style-type: none"> ... Significant others can be added to the voucher upon approval by the landlord and HABC management. ... 	6-10	<p>Revising bullet for Deputy Chief approval:</p> <p>6.6.2 Reporting Additions to Owner and HABC (moved from previous section 6.6.9)</p> <p>Reasons to approve additional household members include, but are not limited to:</p> <ul style="list-style-type: none"> ... Significant others can be added to the voucher upon approval by the landlord and HABC management <i>by the Deputy Chief for HCVP or designee.</i> ...
<p><u>6.7 AVERAGEING INCOME</u></p> <p><u>6.8 MINIMUM INCOME</u></p>	6-11	<p>No changes to language or policy.</p> <p>Moved to sub-sections of new 6.4 INCOME AND ALLOWANCES:</p> <p>6.4.3 Averaging Income and 6.4.4 Minimum Income</p>
<p><u>6.14 ASSETS DISPOSED OF FOR LESS THAN FAIR MARKET VALUE</u></p> <p>...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 the two-year period is less than \$5,000, they will not be considered an asset. Anything under \$5,000 is</p>	6-13	<p>New Section # and updated language to current initiative:</p> <p><u>6.12 ASSETS DISPOSED OF FOR LESS THAN FAIR MARKET VALUE</u></p> <p>...HABC’s minimum threshold for counting assets disposed of for less than fair market value is \$5,000 <i>50,000</i>. If the total value of assets disposed of within the two-year period is less</p>

FY2018 HCVP Admin Plan CURRENT POLICY	Page #	FY2019 HCVP Admin Plan AMENDMENTS PROPOSED POLICY
--	-----------	--

verified through self-declaration.		than \$5,000–50,000 , they will not be considered an asset. Anything under \$5,000–50,000 is verified through self-declaration.
------------------------------------	--	---

Chapter 6: Factors Related to Total Tenant Payment and Family Share Determination (Continued)

<p><u>6.19 UTILITY ALLOWANCE AND UTILITY REIMBURSEMENT PAYMENTS</u></p> <p>6.19.1 Water Conservation Efforts Affecting Utility Allowance</p> <p>Additionally, non-federal funds will be provided for water conservation installations. Third party verification will be obtained for water consumption reduction and utility allowance payments (UAPs) will be adjusted accordingly. Cost saving will commence in FY2016 once reimbursement to the landlord’s capital expenditures are complete and UAPs adjusted. The UAP will not be adjusted until installation is complete and verified.</p>	6-16	<p>New Section # and change all “Utility Reimbursement” to “Utility Allowance Payments (UAPs)”:</p> <p><u>6.17 UTILITY ALLOWANCE AND UTILITY REIMBURSEMENT ALLOWANCE PAYMENTS</u></p> <p>6.17.1 Water Conservation</p> <p>Additionally, non-federal funds will be provided for water conservation installations. Third party verification will be obtained for water consumption reduction and utility allowance payments (UAPs) will be adjusted accordingly. Cost saving will commence in FY2016 <i>upon implementation</i> once reimbursement to the landlord’s capital expenditures are complete and UAPs adjusted. The UAP will not be adjusted until installation is complete and verified.</p>
--	------	--

Chapter 7: Verification Procedures

<p><u>7.3 METHODS OF VERIFICATION AND TIME ALLOWED</u></p> <p>7.3.4 Review of Documents</p> <p>...All such documents, excluding government checks, will be photocopied and retained in the applicant file. In cases where documents are viewed which cannot be photocopied, staff viewing the document(s) will complete a Certification of Document Viewed or Person Contacted form or document.</p> <p>HABC will accept the following original unaltered documents from the family provided that the document is such that tampering would be easily noted:</p> <ul style="list-style-type: none"> • Printed wage stubs: <ul style="list-style-type: none"> ○ Four (4) consecutive paystubs for bi-weekly paychecks; ○ Six (6) consecutive paystubs for weekly paychecks. 	7-3	<p>Revise policy as per consultant recommendations:</p> <p>7.3.4 Review of Documents</p> <p>...All such documents, excluding government checks, will be photocopied and retained in the applicant <i>and participant</i> file. In cases where documents are viewed which cannot be photocopied, staff viewing the document(s) will complete a Certification of Document Viewed or Person Contacted form or document <i>note the applicant or participant file that documents were viewed, and acceptable.</i></p> <p>HABC will accept the following original unaltered documents from the family provided that the document is such that tampering would be easily noted:</p> <ul style="list-style-type: none"> • Printed wage stubs: <ul style="list-style-type: none"> ○ Four (4) <i>Two (2)</i> consecutive paystubs for bi-weekly paychecks; ○ Six (6) <i>Four (4)</i> consecutive paystubs for weekly paychecks.
<p><u>7.4 ITEMS TO BE VERIFIED</u></p> <ul style="list-style-type: none"> • ... • Current assets over \$5,000 including assets over \$5,000 disposed of for less than fair market value in preceding two years. • ... • Social security numbers for all family members six (6) years of age or older who 	7-4	<p>Update language to reflect proposed policy:</p> <p><u>7.4 ITEMS TO BE VERIFIED</u></p> <ul style="list-style-type: none"> • ... • Current assets over \$5,000–50,000 including assets over \$5,000–50,000 disposed of for less than fair market value in preceding two years. • ... • Social security numbers for all family members six (6)

FY2018 HCVP Admin Plan CURRENT POLICY	Page #	FY2019 HCVP Admin Plan AMENDMENTS PROPOSED POLICY
--	-----------	--

<ul style="list-style-type: none"> • ... have been issued a social security number. 		<ul style="list-style-type: none"> • ... years of age or older who have been issued a social security number.
--	--	---

Chapter 7: Verification Procedures (Continued)

<p><u>7.5 VERIFYING NON-FINANCIAL FACTORS</u></p> <p>7.5.1 Verification of Legal Identify</p> <p>In order to prevent program abuse, HABC will require applicants to furnish verification of legal identify for all family members...</p> <ul style="list-style-type: none"> • ... • Current valid Driver’s license, or clear photo identification • U.S. military discharge (DD 214) • Voter’s registration • Department of Motor Vehicles Identification Card <p>Documents considered acceptable for the verification of legal identify for minors, in order of preference may be one or more of the following;</p> <ul style="list-style-type: none"> • Certificate of Birth or Birth Registration • Church issued baptismal certificate • Adoption papers • Custody agreement • Health and Human Services ID • Hospital records • School identification 	<p>7-4 to 7-5</p>	<p>Update language to reflect current practice:</p> <p><u>7.4 ITEMS TO BE VERIFIED</u></p> <p>In order to prevent program abuse, HABC will require applicants <i>and participants</i> to furnish verification of legal identify for all family members...</p> <ul style="list-style-type: none"> • ... • Current Valid Driver’s license, or clear photo identification <i>card issued by Department of Motor Vehicles</i> <p><i>Other forms of identification verification may be accepted, if no other form of verification is available:</i></p> <ul style="list-style-type: none"> • U.S. military discharge (DD 214) <i>form</i>; • Voter’s registration <i>card</i>; • Department of Motor Vehicles Identification Card • <i>Social Security Award letters</i> <p>Documents considered acceptable for the verification of legal identify for minors, in order of preference may be one or more of the following;</p> <ul style="list-style-type: none"> • Certificate of Birth or Birth Registration • <u>Hospital records</u> <p><i>Other acceptable forms for the verification of legal identify for minors may include (when no other forms are available):</i></p> <ul style="list-style-type: none"> • Church issued baptismal certificate • Adoption papers • Custody agreement • Health and Human Services ID • <u>Hospital records</u> • School identification • <u>Church issued baptismal certificate</u>
<p>7.5.2 Verification of Marital Status</p> <p>This would be used to determine the definition of spouse for income and deduction purposes, and citizenship determinations:</p> <p>Verification of divorce status will be a certified copy of the divorce decree, signed by a Court Officer</p> <p>Verification of separation may be a copy of court-ordered maintenance or other records.</p> <p>Verification of marriage status is a marriage certificate.</p>	<p>7-5</p>	<p>Clarify language:</p> <p>7.5.2 Verification of Marital Status</p> <p>This would <i>The verification of marital status may</i> be used to determine the definition of spouse for income and deduction purposes, and citizenship determinations. <i>Marital status may be verified through the following:</i></p> <ul style="list-style-type: none"> • Divorce - Verification of divorce status will be a certified copy of the divorce decree, signed by a Court Officer • Separation - Verification of separation may be a copy of court-ordered maintenance or other records. • Marriage - Verification of marriage status is a marriage

FY2018 HCVP Admin Plan CURRENT POLICY	Page #	FY2019 HCVP Admin Plan AMENDMENTS PROPOSED POLICY
--	-----------	--

		certificate.
--	--	--------------

Chapter 7: Verification Procedures (Continued)

<p>7.5.8 Verification of Social Security Numbers [24 CFR 5.216]</p> <p>Social security numbers must be provided as a condition of eligibility for all family members age six and over if they have been issued a number...</p> <p>New family members ages six and older will be required to produce their social security card (if one has been issued)...</p> <p>...The applicant/participant family member will have an additional thirty (30) days to provide proof of the social security number...</p> <p>In the case of an individual at least sixty-two (62) years of age, HABC may grant an extension for an additional one hundred and twenty (120) calendar days...</p>	7-7	<p>Update language to reflect current 24 CFR 5.216:</p> <p>7.5.8 Verification of Social Security Numbers [24 CFR 5.216]</p> <p>Social security numbers must be provided as a condition of eligibility for all family members age six and over if they have been issued a number...</p> <p><i>Additions of new family members who are at least age six (6) and older will be required to produce their social security card (if one has been issued)...</i></p> <p>...The applicant/participant family member will have an additional thirty (30) <i>ninety (90) calendar</i> days to provide proof of the social security number...</p> <p>In the case of an individual at least sixty-two (62) years of age, HABC may grant an extension for an additional one hundred and twenty (120) <i>ninety (90)</i> calendar days...</p>
<p><u>7.7 VERIFICATION OF INCOME</u></p> <p>7.7.9 Zero Income Status</p> <p>Any member of the family claiming to have no income will be required to execute verification forms to determine that forms of income such as unemployment benefits, TANF, SSI, etc. are not being received by the household. HABC will obtain third party verification (written/oral) from the appropriate agencies.</p>	7-9	<p>Add sentence to clarify that zero income status verification will be done at every re-examination if claiming zero income:</p> <p>Any member of the family claiming to have no income will be required to execute verification forms to determine that forms of income such as unemployment benefits, TANF, SSI, etc. are not being received by the household. HABC will obtain third party verification (written/oral) from the appropriate agencies.</p> <p><i>This level of verification will be done at every re-examination if claiming zero income status.</i></p>
<p><u>7.8 INCOME FROM ASSETS</u></p> <p>7.8.1 Savings Account Interest income and Dividends Over \$5,000</p> <p>7.8.2 Interest Income from Mortgages or Similar Arrangements over \$5,000</p>	7-9	<p>Update language to reflect current initiative:</p> <p>7.8.1 Savings Account Interest income and Dividends Over \$5,000-50,000</p> <p>7.8.2 Interest Income from Mortgages or Similar Arrangements over \$5,000-50,000</p>
<p><u>7.9 VERIFICATION OF ASSETS</u></p> <p>7.9.1 Family Assets</p> <p>...Anything under \$5000 is verified through self-declaration.</p>	7-13	<p>Update language to reflect current initiative:</p> <p>...Anything under \$5,000-50,000 is verified through self-declaration.</p> <p>7.9.2 Assets over \$5,000-50,000 Disposed of for Less than Fair Market Value (FMV) During Two Years Preceding</p>

FY2018 HCVP Admin Plan CURRENT POLICY	Page #	FY2019 HCVP Admin Plan AMENDMENTS PROPOSED POLICY
--	-----------	--

7.9.2 Assets over \$5000 Disposed of for Less than Fair Market Value (FMV) During Two Years Preceding Effective Date of Certification or Re-Examination		Effective Date of Certification or Re-Examination
---	--	---

Chapter 8: Voucher Issuance and Briefings

<p><u>8.1 INTRODUCTION</u></p> <p>...The information provided to families will also include descriptions of mobility counseling programs established to implement components of the partial consent decree entered in the Thompson v. HUD case.</p>	8-1	<p>Update language to reflect current practice:</p> <p>...The Other information provided to families will <i>may</i> also include descriptions of mobility counseling programs established to implement components of the partial consent decree entered in the Thompson v. HUD case. <i>See Appendix II for more detailed information.</i></p>
<p><u>8.3 BRIEFING TYPES AND REQUIRED ATTENDANCE</u></p> <p>8.3.1 Applicant Briefings</p> <p>A full briefing will be conducted for applicant families who are determined to be eligible for assistance...</p> <p>Briefings will be conducted in English...</p> <p>HABC will use the briefing to explain the documents included in the voucher information packet...</p>	8-2	<p>Update language to reflect current practice:</p> <p>8.3.1 Applicant Voucher Briefings</p> <p>A full briefing will be conducted for applicant families who are determined to be eligible for assistance...</p> <p><i>Briefings Voucher briefings</i> will be conducted in English...</p> <p>HABC will use the <i>voucher</i> briefing to explain the documents included in the voucher information packet...</p>
<p><u>8.3 BRIEFING TYPES AND REQUIRED ATTENDANCE</u></p> <p>8.3.2 Applicant Briefing Packet</p> <p>...The family is provided with the following information and materials:</p> <ul style="list-style-type: none"> • The term of the voucher, and HABC policy for requesting extensions or suspensions of the voucher (referred to as tolling). • ... • Where the family may lease a unit. For families that qualify to lease a unit outside the HABC jurisdiction under portability procedures, the information must include an explanation of how portability works. • ... 	8-2 to 8-4	<p>Update language to reflect current practice:</p> <p>8.3.2 Applicant Voucher Briefing Packet</p> <p>...The family is provided with the following information and materials:</p> <ul style="list-style-type: none"> • The term of the voucher, and HABC policy for requesting extensions. • <i>Tolling time</i> or suspensions of the voucher (referred to as tolling). • ... • Where the family may lease a unit, <i>including renting a unit outside HABC's jurisdiction</i>. • <i>Information</i> for families that qualify to lease a unit outside the HABC jurisdiction under portability procedures, the information must include an explanation of how portability works. • ...
<p><u>8.3 BRIEFING TYPES AND REQUIRED ATTENDANCE</u></p> <p>8.3.4 Other Steps to Increase Landlord Participation</p>	8-5	<p>Update language to reflect current practice:</p> <p>8.3.4 Other Steps to Increase Landlord Participation</p> <ul style="list-style-type: none"> • ...

FY2018 HCVP Admin Plan CURRENT POLICY	Page #	FY2019 HCVP Admin Plan AMENDMENTS PROPOSED POLICY
--	-----------	--

<ul style="list-style-type: none"> ... Providing notice of workshops, etc.; ... 		<ul style="list-style-type: none"> Providing notice of Holding workshops, <i>special events</i>, etc.; ...
--	--	---

Chapter 8: Voucher Issuance and Briefings (Continued)

<p><u>8.3 BRIEFING TYPES AND REQUIRED ATTENDANCE</u></p> <p>8.3.5 Owner Briefing</p> <p>Scheduled briefings may be held during the month for both landlord outreach and for pending HAP landlords.</p> <p>New and prospective owners will receive a personal invitation. Current owners will be notified via mail or newsletter...</p>	8-5	<p>Update language to reflect current practice:</p> <p>8.3.5 Owner Briefing</p> <p>Scheduled briefings may be held during the month for both <i>existing</i> landlord outreach and for pending HAP-prospective landlords.</p> <p>New and prospective owners will may receive an personal invitation <i>via e-mail upon request</i>. Current owners will be notified via <i>e-mail</i> or newsletter...</p>
<p><u>8.7 RETENTION OF VOUCHER – SPLIT HOUSEHOLDS</u></p> <p>In those instances when an applicant family in possession of a voucher becomes divided into two otherwise eligible families due to divorce, legal separation, or the division of the family, and the new families cannot agree as to which new family unit should continue to receive the assistance, and there is no determination by a court, HABC shall consider, in order, the following factors to determine which of the families will continue to be assisted:...</p>	8-7	<p>Update language to reflect current practice:</p> <p><i>Split households occur when a family may separate for any reason such as divorce, legal separation, or other division of the family, and the new families cannot agree as to which new family unit should continue to receive assistance and there is no determination by a court.</i> In those instances when an applicant <i>or participant</i> family in possession of a voucher becomes divided into two otherwise eligible families due to divorce, legal separation, or the division of the family, and the new families cannot agree as to which new family unit should continue to receive the assistance, and there is no determination by a court, HABC shall consider, in order, the following factors to determine which of the families will continue to be assisted:...</p>
<p><u>8.8 RETENTION OF VOUCHER – REMAINING MEMBER OF TENANT FAMILY</u></p> <p>...Persons that have been previously approved as family members can be considered the remaining member of the tenant family...</p>	8-8	<p>Updating entire Plan making language referring to “tenant” say “participant” where appropriate:</p> <p><u>8.8 RETENTION OF VOUCHER – REMAINING MEMBER OF TENANT PARTICIPANT FAMILY</u></p> <p>...Persons that have been previously approved as family members can be considered the remaining member of the tenant <i>participant</i> family...</p>

Chapter 11: Owner Rents, Rent Reasonableness, and Payment Standards

<p><u>11.3 MAKING PAYMENTS TO OWNERS</u></p> <p>...Checks are disbursed bi-monthly, with the primary check run for the 1st of the month distribution. A second run typically takes place on, or around the 15th. On occasion HABC may require owners to pick up HAP checks as part of a “paymaster” verification</p>	11-1	<p>Update language to reflect current practice:</p> <p>...Checks are disbursed bi-monthly, with the primary check run for on, or around the 1st of the month distribution. A second run typically takes place on, or around the 15th. <i>Written checks may be picked up at the Fiscal Operations Office located at 417 East Fayette Street, Baltimore, MD 21202. On occasion HABC</i></p>
---	------	--

FY2018 HCVP Admin Plan CURRENT POLICY	Page #	FY2019 HCVP Admin Plan AMENDMENTS PROPOSED POLICY
--	-----------	--

function. Checks that are not received will not be replaced until a written request (e.g., mail, email, or fax) has been received from the payee and a stop payment has been put on the check.		may require owners to pick up HAP checks as part of a "paymaster" verification function. Checks that are not received will not be replaced until a written request (e.g., mail, email, or fax) has been received from the payee and a stop payment has been put on the check.
--	--	--

Chapter 11: Owner Rents, Rent Reasonableness, and Payment Standards (Continued)

<p><u>11.3 MAKING PAYMENTS TO OWNERS</u></p> <p>11.3.1 Direct Deposit</p> <p>To assist HABC in its outreach efforts to owners and to provide better customer service, HABC offers automatic monthly HAP deposits directly into the bank accounts of property owners/agents.</p> <p>Direct deposit of HAP is now mandatory. Property owners and agents may be charged a fee up to one-percent (1%) of the HAP for paper statements. Direct Deposit request forms may be obtained online through www.baltimorehousing.org or from the HCV Program Customer Service Office.</p>	11-1	<p>Update language to reflect current practice:</p> <p>To assist HABC in its outreach efforts to owners and to provide better customer service, HABC offers mandates automatic monthly HAP deposits directly into the bank accounts of property owners/agents.</p> <p>Direct deposit of HAP is now mandatory. Property owners and agents may be charged a fee up to one-percent (1%) of the HAP for paper statements <i>and checks, of which will be available for pick up at the Fiscal Operations Office located at 417 East Fayette Street, Baltimore, MD 21202.</i> Direct Deposit request forms may be obtained online <i>via the Landlord Portal, or through by visiting</i> www.baltimorehousing.org or from the HCV Program Customer Service Office.</p>
<p><u>11.4 RENT REASONABLENESS DETERMINATIONS</u></p> <p>...HABC will re-determine the reasonable rent:</p> <ul style="list-style-type: none"> • Before any increase in the rent to owner. • If there is a five percent decrease in HABC's Payment Standard in effect sixty (60) days before the contract anniversary (for the unit size rented by the family) as compared with HABC's Payment Standard in effect one year before the contract anniversary. • ... 	11-2	<p>Update language to reflect current practice:</p> <p>...HABC will <i>may</i> re-determine the reasonable rent <i>at the following times (not limited to):</i></p> <ul style="list-style-type: none"> • Before any increase in the rent to owner. • If there is a five <i>ten (10%)</i> percent decrease in HABC's Payment Standard in effect sixty (60) days before the contract anniversary (for the unit size rented by the family) as compared with HABC's Payment Standard in effect one year before the contract anniversary. • ...

Chapter 12: Re-Examinations

<p><u>12.1 INTRODUCTION</u></p> <p>...Generally, HABC will reexamine the income and household composition of all participating households once every twenty-four (24) months. Households containing families who have fixed income will be reexamined once every thirty-six (36) months.</p>	12-1	<p>Update language to reflect current practice:</p> <p>...Generally, HABC will reexamine the income and household composition of all participating households once every twenty-four (24) months. Households containing families <i>members</i> whose have sole source of income is fixed income will be reexamined once every thirty-six (36) months.</p>
<p><u>12.2 BIENNIAL REEXAMINATION</u></p> <p>...HABC will generally conduct a reexamination of household income and composition for households that consist of participants who have fixed income one time every thirty-six (36) months. All other households reexamination period will be one time</p>	12-1	<p>Update language to reflect current practice:</p> <p>...HABC will generally conduct a reexamination of household income and composition for households that consist of participants <i>members</i> whose sole source of income is have fixed income one time every thirty-six (36) months. All other households reexamination period will be one time every</p>

FY2018 HCVP Admin Plan CURRENT POLICY	Page #	FY2019 HCVP Admin Plan AMENDMENTS PROPOSED POLICY
--	-----------	--

every twenty-four (24) months unless otherwise stated below.		twenty-four (24) months unless otherwise stated below.
--	--	--

Chapter 12: Re-Examinations (Continued)

<p><u>12.2 BIENNIAL REEXAMINATION</u></p> <p>The twenty-four (24) and thirty-six (36) month re-examination policies do <u>not</u> apply to:</p> <ul style="list-style-type: none"> • ... • Residents with other vouchers that do not qualify based on HUD funding restrictions • ... 	12-1	<p>Change Section Title and add clarifying language to 2nd bullet:</p> <p><u>12.2 BIENNIAL REEXAMINATIONS</u></p> <p>The twenty-four (24) and thirty-six (36) month re-examination policies do <u>not</u> apply to:</p> <ul style="list-style-type: none"> • <i>Zero Income Households</i> • Residents with other vouchers that do not qualify based on HUD funding restrictions (<i>i.e., Veterans Affairs Supportive Housing (VASH), etc.</i>) • ... <p><i>Annual reexaminations will be conducted for participants in all of the above categories.</i></p>
<p><u>12.2 BIENNIAL REEXAMINATION</u></p> <p>12.2.2 Completion of Biennial Reexaminations</p>	12-2	<p>Change Section Title:</p> <p>12.2.2 Completion of Biennial Reexaminations</p>
<p><u>12.2 BIENNIAL REEXAMINATION</u></p> <p>12.2.3 Collection of Information</p> <p>...HABC will require the household to complete the Personal Declaration Form and all reexamination forms. The household will be required to submit the completed forms to HABC via mail or in person as prescribed below...</p>	12-2	<p>Update language to reflect current online practices:</p> <p>12.2.3 Collection of Information</p> <p>...HABC will require the household to complete the Personal Declaration Form and all reexamination forms. The household will be required to submit the completed forms to HABC via mail, or in person, <i>or online as prescribed below...</i></p>
<p><u>12.2 BIENNIAL REEXAMINATION</u></p> <p>12.2.4 Failure to Respond to Notification of Reexamination</p> <p>...If the household fails to attend the initial reexamination appointment, 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.</p> <p>If the household fails to keep the second scheduled reexamination appointment, the termination process will commence...If the household attends either reexamination appointment but fails to submit the</p>	12-2	<p>Update language to reflect current online practices:</p> <p>12.2.4 Failure to Respond to Notification of Reexamination</p> <p>...If the household fails to attend the initial reexamination appointment, a second reexamination appointment will be scheduled. This second appointment will be scheduled approximately seven (7) calendar <i>business</i> 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 reexamination appointment, the termination process will commence...If the household attends either reexamination appointment but fails to submit the required and complete documentation necessary for the reexamination, they will be given no more than ten (10) calendar days to provide the</p>

FY2018 HCVP Admin Plan CURRENT POLICY	Page #	FY2019 HCVP Admin Plan AMENDMENTS PROPOSED POLICY
--	-----------	--

required and complete documentation necessary for the reexamination, they will be given no more than ten (10) calendar days to provide the documentation...		documentation, <i>unless a reasonable accommodation is requested and approved by the Deputy Chief for HCVP, or designee...</i>
---	--	--

Chapter 12: Re-Examinations (Continued)

<p><u>12.2 BIENNIAL REEXAMINATION</u></p> <p>12.2.6 Verification of Information</p> <p>HABC will follow the verification procedures and guidelines described in this Plan.</p>	12-3	<p>Add language to provide better direction to verification procedures:</p> <p>12.2.6 Verification of Information</p> <p>HABC will follow the verification procedures and guidelines described in this Plan (<i>see Chapter 7 for more detailed information</i>).</p>
<p><u>12.2 BIENNIAL REEXAMINATION</u></p> <p>New Section 12.2.9</p> <p>Copied Previous Section 12.3.2 under Interim Reexaminations to new section 12.2.9 under Reexaminations</p>	12-3	<p>New Section – moved language from 12.3.2 to 12.2.9:</p> <p>12.2.9 Reexaminations Prompted by Moves outside the Jurisdiction (Port-Outs)</p> <p>When moving out of Baltimore City, A full reexamination of household information will be required when a household is issued a voucher to move to another jurisdiction (<i>outside of Baltimore City</i>) and more than one hundred fifty (150) calendar days has elapsed since the last reexamination effective date. Upon completion of the full reexamination, the next reexamination date will be within twelve (12) months, twenty-four (24) months, or thirty-six (36) months (dependent on program) from the effective date of the reexamination. All households that are issued vouchers to move must complete a Personal Declaration Form. Additionally HABC will complete an EIV update on all households who are issued a voucher to move.</p>
<p><u>12.3 INTERIM REEXAMINATIONS</u></p> <p>Under certain circumstances, participating households may or must request Interim Reexaminations. At the time of such a request, HABC may, at its discretion, opt to perform a full reexamination. This will initiate a change to the date of the household’s regular reexamination schedule.</p>	12-3	<p>Update/add language to reflect current practice:</p> <p>Under certain circumstances, participating households may or must request Interim Reexaminations. <i>In the event that an interim is conducted within one-hundred and twenty (120) days of a scheduled full reexamination, At the time of such a request,</i> HABC may, at its discretion, opt to perform a full reexamination <i>instead of an interim</i>. This will initiate a change to the date of the household’s regular reexamination schedule.</p> <p><i>Interims will be conducted for decreases in income, increases in income by more than \$200 per week (\$400 bi-weekly, \$800 monthly, or \$10,400 annually), and for family composition changes. Increases in income that are less than \$200 per week may be reported at the next scheduled full reexamination.</i></p>

FY2018 HCVP Admin Plan CURRENT POLICY	Page #	FY2019 HCVP Admin Plan AMENDMENTS PROPOSED POLICY
--	-----------	--

--	--	--

Chapter 12: Re-Examinations (Continued)

<p><u>12.3 INTERIM REEXAMINATIONS</u></p> <p>12.3.1 Interim Reexaminations Prompted by Decreases in Income</p> <p>Households may request interim reexaminations. Circumstances, which fall under interim reexaminations, include but may not be limited to:</p> <ul style="list-style-type: none"> • Decrease in Gross Income • Increase in allowances or deductions 	12-3	<p>Rename Section Title, and update language to include all changes in income:</p> <p>12.3.1 Interim Reexaminations Prompted by Decreases <i>Changes</i> in Income</p> <p>Households may request interim reexaminations. Circumstances, which fall under interim reexaminations, include but may not be limited to:</p> <ul style="list-style-type: none"> • Decreases in Gross Income • Increases in allowances or deductions (<i>see Section 12.3.4</i>); • <i>When the household's weekly gross income has increased by more than \$200 per week (\$400 bi-weekly, \$800 monthly, \$10,400 annually). The \$200 per week increase may be the cumulative result of multiple increases in family income over time.</i> <p><i>Participants may report a decrease in income and other changes, such as an increase in allowances or deductions that would reduce the amount of household rent at any time, but are limited to one request per year.</i></p> <p><i>If the reexamination results in a lower household rent share, the new household rent share shall become effective at the next monthly rent payment schedule (usually the 1st of the following month). HABC may make a retroactive payment to the household for the difference between the old and new household rent shares. This payment will in no case be for any period prior to the date the household reported the decrease in household income.</i></p> <p><i>HABC may at any time require a program participant to provide evidence that the circumstances leading to a rent decrease remain in effect. Furthermore, the participant is required to report such changes within thirty (30) calendar days of their occurrence (see Section 12.3.1 Interim Reexaminations Prompted by Changes in Income and Section 12.3.3 Interim Reexamination Prompted by Changes in Household Composition).</i></p>
--	------	---

FY2018 HCVP Admin Plan CURRENT POLICY	Page #	FY2019 HCVP Admin Plan AMENDMENTS PROPOSED POLICY
--	-----------	--

--	--	--

Chapter 12: Re-Examinations (Continued)

<p><u>12.3 INTERIM REEXAMINATIONS</u></p> <p>12.3.1 Interim Reexaminations Prompted by Decreases in Income</p> <p>Households may request interim reexaminations. Circumstances, which fall under interim reexaminations, include but may not be limited to:</p> <ul style="list-style-type: none"> • Decrease in Gross Income • Increase in allowances or deductions 	12-3	<p>Same section from above, continued (green text is cut from old section 12.3.4 Interim Prompted by Increases in Income):</p> <p><i>Any increase in income greater than the threshold mentioned above, These changes must be reported to HABC within thirty (30) calendar days of the date the change occurred. Reporting of applicable changes in household income will trigger an interim reexamination. Any increase in the household portion of rent resulting from this interim reexamination will become effective thirty (30) calendar days from the date the household income changed or on the household's biennial-next full reexamination effective date, whichever comes earlier.</i></p> <p><u>The household will be responsible for reimbursing HABC any HAP/UAP costs for overpayments, and for which were incurred by HABC as a result of household failure to report increases in income in a timely manner.</u></p> <p><u>HABC will not change the date of the regular biennial-full reexamination when an interim reexamination is conducted due to a change in household income.</u></p>
<p><u>12.3 INTERIM REEXAMINATIONS</u></p> <p>12.3.2 Reexaminations Prompted by Moves</p> <p>A full reexamination of household information will be required when a household is issued a voucher to move and more than one hundred fifty (150) calendar days has elapsed since the last reexamination effective date. Upon completion of the full reexamination, the next reexamination date will be twenty-four (24) months (thirty-six (36) months for households that consist of participants who have fixed income) from the effective date of the reexamination. All households that are issued vouchers to move must complete a Personal Declaration Form. Additionally HABC will complete an EIV update on all households who are issued a voucher to move.</p>	12-3	<p>Rename Section Title, and update language to include interim moves within jurisdiction:</p> <p>12.3.2 <i>Interim</i> Reexaminations Prompted by Moves <i>within the Jurisdiction</i></p> <p><i>If there is any change in income or family composition reported by the family at the time of voucher issuance, A full an interim reexamination of household information will be required. when a household is issued a voucher to move and more than one hundred fifty (150) calendar days has elapsed since the last reexamination effective date. Upon completion of the full reexamination, the next reexamination date will be twenty-four (24) months (thirty-six (36) months for households that consist of participants who have fixed income) from the effective date of the reexamination. All households that are issued vouchers to move must complete a Personal Declaration Form. Additionally HABC will complete an EIV update on all households who are issued a voucher to move.</i></p>
<p><u>12.3 INTERIM REEXAMINATIONS</u></p>	12-3 to 12-4	Update language to reflect current practice:

FY2018 HCVP Admin Plan CURRENT POLICY	Page #	FY2019 HCVP Admin Plan AMENDMENTS PROPOSED POLICY
--	-----------	--

<p>12.3.3 Interim Reexaminations Prompted by Changes in Household Composition</p> <p>...This includes additions due to birth, adoption and court-awarded custody. The household must obtain HABC approval prior to all other additions to the household.</p>		<p>12.3.3 Interim Reexaminations Prompted by Changes in Household Composition</p> <p>...This includes additions due to birth, adoption, <i>foster care, marriage, significant other relationships, and</i> or court-awarded custody. The household must obtain HABC approval prior to all other additions to the household.</p>
---	--	--

Chapter 12: Re-Examinations (Continued)

<p><u>12.3 INTERIM REEXAMINATIONS</u></p> <p>12.3.4 Interim Reexamination Prompted by Increases in Income and</p> <p>12.3.5 Interim Reexamination Prompted by Decreases in Gross or Adjusted Income</p>	12-4	Both of these sections were moved to be included in updated Section 12.3.1 Interims Prompted by Changes in Income
--	------	--

<p><u>12.3 INTERIM REEXAMINATIONS</u></p> <p>12.3.6 Interim Reexaminations Prompted by HABC Errors</p> <p>If HABC makes a calculation error at admission to the program or at a biennial reexamination, an interim reexamination will be conducted, if necessary, to correct the error, but the household will not be charged retroactively...</p>	12-5	<p>Update Section # and language to reflect current practice:</p> <p>12.3.4 Interim Reexaminations Prompted by HABC Errors</p> <p>If HABC makes a calculation error at admission to the program or at a biennial <i>during a full</i> reexamination, an interim reexamination will be conducted, if necessary, to correct the error, but the household will not be charged retroactively...</p>
--	------	---

<p><u>12.3 INTERIM REEXAMINATIONS</u></p> <p>12.3.7 Interim Reexamination Prompted by Zero Income Household Status</p> <p>An interim reexamination review will be completed every one hundred twenty (120) calendar days for households reporting zero income...</p> <p>HABC will not change the date of the regular biennial reexamination when an interim reexamination is conducted due to a zero income household status.</p>	12-3 to 12-4	<p>Update Section # and language to reflect current practice:</p> <p>12.3.5 Interim Reexamination Prompted by Zero Income Household Status</p> <p>An interim reexamination review will be completed every one hundred twenty (120) calendar days for <i>entire</i> households reporting zero income. <i>Households where the entire family is reporting zero income are required to report <u>all</u> income changes within thirty (30) calendar days regardless of the amount earned...</i></p> <p>HABC will not change the date of the regular biennial <i>annual</i> reexamination when an interim reexamination is conducted due to a zero income household status.</p>
---	--------------	---

<p><u>12.3 INTERIM REEXAMINATIONS</u></p> <p>12.3.8 Interim Reexamination Prompted by Temporary or Sporadic Income</p> <p>An interim reexamination review will be completed (as reported) every one hundred twenty (120) calendar days for households reporting only</p>	12-5	<p>Update Section # and language to reflect current practice:</p> <p>12.3.6 Interim Reexamination Prompted by Temporary or Sporadic Income</p> <p><u>Temporary or sporadic income is defined as income that is neither reliable nor periodic and is excluded from the</u></p>
--	------	--

FY2018 HCVP Admin Plan CURRENT POLICY	Page #	FY2019 HCVP Admin Plan AMENDMENTS PROPOSED POLICY
--	-----------	--

temporary or sporadic income. Temporary or sporadic income is neither reliable nor periodic and is excluded from the calculation of annual income...		<u>calculation of annual income.</u> An interim reexamination review will be completed (as reported) every one hundred twenty (120) calendar days <i>twelve (12) months</i> for households reporting only temporary or sporadic income. Temporary or sporadic income is neither reliable nor periodic and is excluded from the calculation of annual income....
--	--	--

Chapter 12: Re-Examinations (Continued)

<p><u>12.3 INTERIM REEXAMINATIONS</u></p> <p>12.3.9 Interim Reexaminations Prompted by Unreported Changes</p> <p>If HABC discovers that a household has not reported required changes in household information and/or income, HABC may conduct a full reexamination. The next scheduled reexamination will take place twenty-four (24) months (thirty-six (36) months for households that consist of participants who have fixed income) from the effective date of the interim reexamination.</p>	12-5	<p>Update Section # and language to reflect current practice:</p> <p>12.3.7 Interim Reexaminations Prompted by Unreported Changes</p> <p>If HABC discovers that a household has not reported required changes in household information and/or income (<i>as described in Section 12.3.1</i>), HABC may conduct a full reexamination (<i>see Section 15.5.2 for more information on fraudulent reporting</i>). The next scheduled reexamination will take place <i>within twelve (12) months</i>, twenty-four (24) months (<i>dependent on the Program</i>), or thirty-six (36) months (<i>for households that consist of participants who have fixed income</i>) from the effective date of the interim <i>that</i> reexamination.</p>
<p><u>12.3 INTERIM REEXAMINATIONS</u></p> <p>12.3.10 Interim Reexaminations – Application of Payment Standards and Utility Allowances</p> <p>For any of the above listed types of Interim Reexaminations, the payment standard that applies to a household when an interim reexamination takes place will be the same payment standard which was in effect at the last biennial or triennial reexamination.</p> <p>The utility allowance schedule that applies to a household when an interim reexamination takes place will be the same utility allowance schedule that was in effect at the last biennial or triennial reexamination.</p>	12-5	<p>Update Section # and language to reflect current practice:</p> <p>12.3.8 Interim Reexaminations – Application of Payment Standards and Utility Allowances</p> <p>For any of the above listed types of Interim Reexaminations, the payment standard that applies to a household when an interim reexamination takes place will be the same payment standard which was in effect at the last <i>annual</i>, biennial, or triennial reexamination, <i>or at the time of a move with continued assistance</i>.</p> <p>The utility allowance schedule that applies to a household when an interim reexamination takes place will be the same utility allowance schedule that was in effect at the last <i>annual</i>, biennial, or triennial reexamination, <i>or at the time of a move with continued assistance</i>.</p>
<p><u>12.4 INCOME CHANGES PROMPTED BY SOCIAL SERVICE / WELFARE PROGRAM REQUIREMENTS</u></p> <p>...However, HABC will reduce the rent if the welfare assistance reduction is a result of...</p>	12-6	<p>Update language to reflect current practice:</p> <p>...However, HABC will <i>may</i> reduce the rent if the welfare assistance reduction is a result of...</p>

FY2018 HCVP Admin Plan CURRENT POLICY	Page #	FY2019 HCVP Admin Plan AMENDMENTS PROPOSED POLICY
--	-----------	--

--	--	--

Chapter 12: Re-Examinations (Continued)

<p><u>12.4 INCOME CHANGES PROMPTED BY SOCIAL SERVICE / WELFARE PROGRAM REQUIREMENTS</u></p> <p>12.4.2 Definition of “Imputed Welfare Income”</p> <p>...If the household claims the amount of imputed welfare income has been calculated incorrectly, the Program Specialist will review the calculation for accuracy. If the imputed welfare income amount is correct, HABC will provide a written notice to the household that includes:</p> <ul style="list-style-type: none"> • A brief explanation of how the amount of imputed welfare income was determined; • A statement that the household may request an informal hearing if they do not agree with HABC’s determination. 	<p>12-6</p>	<p>Update language to reflect current practice:</p> <p>12.4.2 Definition of “Imputed Welfare Income”</p> <p>...If the household <i>participant</i> claims the amount of imputed welfare income has been calculated incorrectly, the Program Specialist will review the calculation for accuracy. If the imputed welfare income amount is correct, HABC will <i>review the calculations with the family</i>. provide a written notice to the household that includes:</p> <ul style="list-style-type: none"> • A brief explanation of how the amount of imputed welfare income was determined; • A statement that the household may request an informal hearing if they do not agree with HABC’s determination.
<p><u>12.4 INCOME CHANGES PROMPTED BY SOCIAL SERVICE / WELFARE PROGRAM REQUIREMENTS</u></p> <p>12.4.3 Household Dispute of Amount of Imputed Welfare Income</p> <p>If the household disputes the amount of imputed income and HABC denies the household's request to modify the amount, HABC will provide the household with a notice of denial, which will include:</p> <ul style="list-style-type: none"> • An explanation for HABC’s determination of the amount of imputed welfare income • A statement that the household may request an informal hearing. • A statement that the grievance information received from the welfare agency cannot be disputed at the informal hearing, and the issue to be examined at the informal hearing will be HABC’s determination of the amount of imputed welfare income, not the welfare agency's determination to sanction the welfare benefits. 	<p>12-7</p>	<p>Update language to reflect current practice:</p> <p>12.4.3 Household Dispute of Amount of Imputed Welfare Income</p> <p>If the household <i>participant</i> disputes the amount of imputed income and HABC denies the household’s <i>participant’s</i> request to modify the amount, HABC will provide the household participant with a notice of denial, which will include:</p> <ul style="list-style-type: none"> • <i>A statement that the household may request an informal meeting with HCVP management; and</i> • An explanation for HABC’s determination of the amount of imputed welfare income • A statement that the household may request an informal hearing. • A statement that the grievance information received from the welfare agency cannot be disputed at the informal hearing, and the issue to be examined at the informal hearing will be HABC’s determination of the amount of imputed welfare income, not the welfare agency’s determination to sanction the welfare benefits.

FY2018 HCVP Admin Plan	Page	FY2019 HCVP Admin Plan AMENDMENTS
CURRENT POLICY	#	PROPOSED POLICY

--	--	--

Chapter 12: Re-Examinations (Continued)

<p><u>12.4 INCOME CHANGES PROMPTED BY SOCIAL SERVICE / WELFARE PROGRAM REQUIREMENTS</u></p> <p>12.4.5 Cooperation Agreements</p> <p>HABC will execute a Memorandum of Understanding with the local welfare agency under which the welfare agency agrees to provide written verification to HABC concerning welfare benefits for applicant and participant households. The welfare agency will provide information regarding a specified reduction in welfare benefits for a household member, listing the following:</p> <ul style="list-style-type: none"> • ... • ... <p>HABC will execute a Memorandum of Understanding with the local welfare agency to ensure timely and accurate verification of noncompliance.</p>	<p>12-7</p>	<p>Update language to reflect current practice:</p> <p>12.4.5 Cooperation Agreements</p> <p>HABC will <i>may</i> execute a Memorandum of Understanding with the local welfare agency under which the welfare agency agrees to provide written verification to HABC concerning welfare benefits for applicant and participant households. The welfare agency will <i>be asked to</i> provide information regarding a specified reduction in welfare benefits for a household member, listing the following:</p> <ul style="list-style-type: none"> • ... • ... <p>HABC will <i>may also</i> execute a Memorandum of Understanding with the local welfare agency to ensure timely and accurate verification of noncompliance.</p>
<p><u>12.5 NOTIFICATION OF RESULTS OF REEXAMINATIONS</u></p> <p>...</p> <p>The Notice of Rent Change will be mailed to the owner and the household in the event of a change in HAP and/or household rent share.</p> <p>If the household disagrees with the rent adjustment, a meeting may be requested to review the rent adjustment.</p>	<p>12-8</p>	<p>Update language to reflect current practice:</p> <p><u>12.5 NOTIFICATION OF RESULTS OF REEXAMINATIONS</u></p> <p>...</p> <p><i>In the event of a change in the Housing Assistance Payment (HAP) and/or participant rent share, a The Notice of Rent Change will be mailed <i>and/or emailed (if available)</i> to the owner and the household <i>participant at least thirty (30) calendar days prior to the reexamination taking effect. in the event of a change in HAP and/or household rent share.</i></i></p> <p>If the household <i>participant</i> disagrees with the rent adjustment, a meeting may be requested to review the rent adjustment.</p>
<p><u>12.6 TIMELY REPORTING OF CHANGES IN INCOME (AND ASSETS)</u></p> <p>12.6.2 Procedures when the Change is Reported in a Timely Manner</p> <p>HABC will notify the household and the owner of any change in the Housing Assistance Payment to be</p>	<p>12-8</p>	<p>Update language to reflect current practice:</p> <p>12.6.2 Procedures when the Change is Reported in a Timely Manner</p> <p>HABC will notify the household and the owner of any change in the Housing Assistance Payment to be effective according to</p>

FY2018 HCVP Admin Plan CURRENT POLICY	Page #	FY2019 HCVP Admin Plan AMENDMENTS PROPOSED POLICY
--	-----------	--

<p>effective according to the following guidelines:</p> <ul style="list-style-type: none"> • ... • <u>Decreases in the Household Rent</u> are effective the first of the month following that in which the change was reported. However, no rent reductions will be processed until all the facts have been verified... 		<p>the following guidelines:</p> <ul style="list-style-type: none"> • ... • <u>Decreases in the Household Rent</u> are effective the first of the month following that in which the change was reported. However, no rent reductions will be processed until all the <i>required documentation and</i> facts have been <i>received and</i> verified...
---	--	--

Chapter 12: Re-Examinations (Continued)

<p><u>12.6 TIMELY REPORTING OF CHANGES IN INCOME (AND ASSETS)</u></p> <p>12.6.3 Procedures when the Change is NOT Reported by the Household in a Timely Manner</p> <p>If the household does not report the change as described under Timely Reporting, the household will have caused an unreasonable delay in the Unscheduled Reexamination processing and the following guidelines will apply:</p> <ul style="list-style-type: none"> • <u>Increases in Household Rent</u> will be effective retroactive to the date it would have been effective had the changes been reported on a timely basis... • ... 	12-8	<p>Update language to reflect current practice:</p> <p>12.6.3 Procedures when the Change is NOT Reported by the <i>Household Participant</i> in a Timely Manner</p> <p>If the <i>household participant</i> does not report the change as described under Timely Reporting, the household will have caused an unreasonable delay in the Unscheduled Reexamination processing and the following guidelines <i>will may</i> apply:</p> <ul style="list-style-type: none"> • <u>Increases in <i>Household Participant</i> Rent</u> will be effective retroactive to the date it would have been effective had the changes been reported on <i>in</i> a timely <i>basis manner</i>... • ...
--	------	--

Chapter 13: Moves with Continued Assistance

<p><u>13.4 PROCEDURE FOR MOVES</u></p> <p>13.4.3 Time of Contract Change</p> <p>In a move, assistance stops at the old unit at the end of the month in which the tenant ceased to occupy the unit, unless proper notice was given to end a lease mid-month. Assistance will start on the new unit on the effective dates of the lease and contract...</p>	13-2	<p>Update language to reflect current practice:</p> <p>In a move, assistance stops at the old unit at the end of the month in which the tenant ceased to occupy the unit, unless proper notice was given to end a lease mid-month. Assistance will start on the new unit on the effective dates of the lease and contract...</p>
<p><u>13.5 PORTABILITY</u></p> <p><i>13.5.1.3 Port-Out Voucher Issuance</i></p> <p>Once the portability request is approved, HABC will issue the family a voucher...</p>	13-3	<p>Update language to reflect current practice:</p> <p><i>During the initial voucher briefing, families are informed of the Portability process and given a Port-Out Request form.</i> Once the portability request is approved, HABC will issue the family a voucher <i>to move to another jurisdiction</i>...</p>

FY2018 HCVP Admin Plan CURRENT POLICY	Page #	FY2019 HCVP Admin Plan AMENDMENTS PROPOSED POLICY
--	-----------	--

--	--	--

Chapter 13: Moves with Continued Assistance (Continued)

<p><u>13.5 PORTABILITY</u></p> <p>13.5.2 Incoming Portability (port-ins)</p> <p>Port-in households will be required to meet all HABC program criteria prior to being accepted (see Chapter 2, ELIGIBILITY FOR ADMISSION and Chapter 3, APPLYING FOR ADMISSION).</p>	<p>13-4</p>	<p>Add paragraph at end of section to update language to reflect current practice:</p> <p><i>As the receiving jurisdiction, HABC will require the documents listed on the HUD Portability Billing Form from the initial jurisdiction. Participants must also be in good standing with the voucher issued by the initial jurisdiction. If HABC denies assistance to the family, HABC will notify the initial PHA and the family will be offered an informal review or hearing.</i></p> <p><i>After receiving and approving the portability paperwork from the initial PHA, HABC will contact the participant within ten (10) business days to schedule a mandatory voucher briefing (see Chapter 8 and Chapter 5 for information on voucher issuance and subsidy standards). The participant will be issued a voucher by HABC which will expire thirty (30) calendars days after the initial PHA's voucher expires, as per HUD regulations.</i></p> <p><i>The participant must submit a Request for Tenancy Approval (RFTA) for an eligible unit prior to the expiration date of the voucher. HABC will grant tolling time in accordance with this Administrative Plan and will inform the initial jurisdiction of any extensions or suspensions of voucher time. Any additional extensions must be requested and granted by the initial PHA and must be received by HABC prior to the expiration date of the voucher.</i></p> <p><i>If the participant fails to complete any of the following, HABC will send the family's paperwork back to the initial PHA within five (5) business days:</i></p> <ul style="list-style-type: none"> <i>• Attend the voucher briefing;</i> <i>• Fail to submit the RFTA prior to voucher expiration;</i> <i>• Fail to execute the lease and take possession of the unit prior to voucher expiration;</i> <i>• Fail to request an extension prior to voucher expiration; or</i> <i>• Request for an extension is denied.</i>
<p><u>13.5 PORTABILITY</u></p>	<p>13-2</p>	<p>Update language to reflect current practice:</p>

FY2018 HCVP Admin Plan CURRENT POLICY	Page #	FY2019 HCVP Admin Plan AMENDMENTS PROPOSED POLICY
--	-----------	--

ADD NEW SECTION		<p>13.5.5 Regular Program Functions</p> <p><i>HABC will perform all program functions applicable to the tenant-based assistance program, such as:</i></p> <ul style="list-style-type: none"> • <i>Reexaminations of family income and composition;</i> • <i>Moves with continued assistance;</i> • <i>Annual inspection of the unit; and</i> • <i>Interim reexaminations when requested or deemed necessary by HABC.</i>
-----------------	--	---

Chapter 14: Contract Terminations

<p><u>14.2 CONTRACT TERMINATION</u></p> <p>... If the family continues to occupy the unit after the Housing Choice Voucher Program contract is terminated, the family is responsible for the total amount of rent due to the owner. After a contract termination, if the family meets the criteria for a move with continued assistance, the family may lease-up in another unit. The contract for the new unit may begin during the month in which the family moved from the old unit.</p>	14-1	<p>Update language to reflect current practice:</p> <p>... If the family continues to occupy the unit after the Housing Choice Voucher Program HAP contract is terminated, the family is responsible for the total amount of rent due to the owner. After a contract termination, if the family meets the criteria for a move with continued assistance, the family may lease-up in another unit. The contract for the a new unit may begin during the <i>on the first day of the following</i> month in which the family moved from the old unit, <i>with the exception of any emergency move or transfer as determined by HABC.</i></p>
<p><u>14.4 TERMINATION OF TENANCY BY THE OWNER: EVICTIONS</u></p> <p>...During the term of the lease, the owner may only evict for:</p> <ul style="list-style-type: none"> • ... • Other good cause. 	14-1	<p>Copy BRHP definition of “Other Good Cause:”</p> <p>...During the term of the lease, the owner may only evict for:</p> <ul style="list-style-type: none"> • ... • Other good cause. <i>Other good cause, which includes but is not limited to:</i> <ul style="list-style-type: none"> ○ <i>The participant’s failure to accept the offer of a new lease in accordance with HUD regulations;</i> ○ <i>A history of disturbances of neighbors or destruction of property;</i> ○ <i>Living or housekeeping habits resulting in damage to the unit or property;</i> ○ <i>Criminal activity by family members involving crimes of physical violent to persons or property; or</i> ○ <i>A business or economic reason.</i>
<p><u>14.4 TERMINATION OF TENANCY BY THE OWNER: EVICTIONS</u></p> <p>14.4.4 Consideration of Rehabilitation</p> <p>...The owner may require the tenant to submit evidence of any of the three (above).</p> <p>Actions of termination by the owner must be consistent with the fair housing and equal opportunities laws as stated in 24 CFR 5.105...</p>	14-2	<p>Split up section 14.4.4 – first section Consideration of Rehabilitation.</p> <p>...The owner may require the tenant to submit evidence of any of the three (above).</p> <p>Second section <i>14.4.5 Actions of Terminations by Owner</i></p> <p>Actions of termination by the owner must be consistent with the fair housing and equal opportunities laws as stated in 24 CFR 5.105...</p>

FY2018 HCVP Admin Plan	Page	FY2019 HCVP Admin Plan AMENDMENTS
CURRENT POLICY	#	PROPOSED POLICY

--	--	--

Chapter 14: Contract Terminations (Continued)

<p><u>14.5 TERMINATION OF THE CONTRACT BY HABC</u></p> <p>The term of the HAP contract terminates when the lease terminates, when HABC terminates program assistance for the family, or when the owner has breached the HAP contract. (See "Owner Disapproval and Restriction" chapter)</p> <p>HABC may also terminate the contract if:</p> <ul style="list-style-type: none"> • The family is required to move from a unit when the subsidy is too big for the family size or the unit does not meet the HQS space standards because of an increase in family size or a change in family composition. • Funding is no longer available under the ACC. <p>The contract will terminate automatically if one hundred and eighty (180) calendar days have passed since the last housing assistance payment to the owner.</p>	<p>14-3</p>	<p>Update language to reflect current practice:</p> <p>The term of the HAP contract terminates when the lease terminates, when HABC terminates program assistance for the family, or when the owner has breached the HAP contract. (See "Owner Disapproval and Restriction" chapter)</p> <p>HABC may also terminate the contract if:</p> <ul style="list-style-type: none"> • The family is required to move from a unit when the subsidy is too big for the family size or the unit does not meet the HQS space standards because of an increase in family size or a change in family composition. • <i>The family is over- or under-housed and elects to take the option to move from the unit.</i> • Funding is no longer available under the ACC. <p>The contract will terminate automatically if one hundred and eighty (180) calendar days have passed since the last housing assistance payment to the owner.</p>
--	-------------	---

Chapter 15: Denial or Termination of Assistance

<p><u>15.2 GROUNDS FOR DENIAL AND TERMINATION</u></p> <p>15.2.3 Grounds for Denial or Termination of Assistance</p> <p>HABC must 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</p>	<p>15-2</p>	<p>Update language to reflect current regulations</p> <p>15.2.3 Grounds for Denial or Termination of Assistance</p> <p>HABC must 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 <i>or abusing alcohol...</i></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 <i>alcohol abuse</i> or a pattern of illegal drug use or <i>alcohol abuse</i> that may threaten the health, safety or right to peaceful enjoyment of the premises by other residents.</p>
---	-------------	--

FY2018 HCVP Admin Plan CURRENT POLICY	Page #	FY2019 HCVP Admin Plan AMENDMENTS PROPOSED POLICY
--	-----------	--

residents.		
------------	--	--

Chapter 15: Denial or Termination of Assistance (Continued)

<p><u>15.3 SCREENING AND TERMINATION FOR DRUG ABUSE AND OTHER CRIMINAL ACTIVITY</u></p> <p>15.3.1 Purpose</p> <p>HABC will check criminal history for all members of the applicant’s household who are age fourteen (14) years and older to determine whether any such member has engaged in drug-related, violent, or other serious criminal activity.</p> <p>Verification of any past criminal activity will be done prior to final eligibility determination and will include a review of conviction records.</p>	15-3	<p>Revising sentence to clarify actual procedures:</p> <p>15.3.1 Purpose</p> <p>HABC will check criminal history for all members of the applicant’s <i>or participant’s</i> household who are age fourteen (14) years and older to determine whether any such member has engaged in drug-related, violent, or other serious criminal activity.</p> <p>Verification of any past criminal activity <u>will include a review of conviction records</u> and will be done prior to final eligibility determination for applicants and at full reexamination for participants and will include a review of conviction records.</p>
<p>INSERT NEW SECTION on Definitions of Temporarily / Permanently Absent (moved from Chapter 6)</p> <p>No new policy – only new sections; text copied from Chapter 6 and moved into Chapter 15.</p>	15-5	<p><u>15.4 DEFINITIONS OF TEMPORARILY / PERMANENTLY ABSENT</u></p> <p>15.4.1 Absence of Any Member <i>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.</i> <i>Space will not be provided for a family member who will be absent for more than one-hundred and eighty (180) consecutive 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 (180) consecutive days. 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>15.4.2 Absence due to Medical Reasons <i>If any family member leaves the household to enter a facility such as hospital, nursing home, or rehabilitation center, HABC will seek advice from a reliable qualified source as to the likelihood and timing of their return. If the verification indicates that the family member will be permanently confined to a nursing home, the family member will be considered</i></p>

FY2018 HCVP Admin Plan	Page	FY2019 HCVP Admin Plan AMENDMENTS
CURRENT POLICY	#	PROPOSED POLICY

		<p><i>permanently absent. If the verification indicates that the family member will return in one hundred and eighty (180) consecutive days, the family member will not be considered permanently absent.</i></p> <p><i>If the person who is determined to be permanently absent is the sole member of the household, assistance will be terminated in accordance with HABC's "Absence of Entire Family" policy.</i></p>
--	--	--

Chapter 15: Denial or Termination of Assistance (Continued)

<p>INSERT NEW SECTION on Definitions of Temporarily / Permanently Absent (moved from Chapter 6)</p> <p>Continued from Previous section</p>	<p>15-5</p>	<p>15.4.3 Absence due to Full-Time Student Status <i>Full-time students (other than head of household or spouse) who attend school away from the home but live with the family during school recesses may, at the family's choice, be considered either temporarily or permanently absent. If the family decides that the member is permanently absent, income of that member will not be included in total household income, the member will not be included on the lease, and the member will not be included for determination of Voucher size. A head of household or spouse will be considered temporarily absent while enrolled in school.</i></p> <p>15.4.4 Absence due to Incarceration <i>Any member of the household will be considered permanently absent if s/he is incarcerated for thirty (30) consecutive days. HABC will determine if the reason for incarceration is for any criminal activity and take appropriate action. Members with a history of criminal activity may be removed at the request of the head of household, on a case-by-case basis. Requests of this nature are considered family composition changes, and as such must be made within thirty (30) calendar days of the incarceration or arresting action of the household member.</i></p> <p>15.4.5 Absence of Children due to Placement in Foster Care <i>If the family includes a child or children temporarily absent from the home due to placement in foster care, the family will be required to provide the appropriate documentation to support the date of child(ren)s return to the unit. If the time period for the absence is to be greater than one hundred and eighty (180) consecutive days from the date of removal of the child/children, the Voucher size will be reduced. If all children are removed from the home permanently, the voucher size will be reduced in accordance with HABC subsidy standards.</i></p> <p>15.4.6 Absence of Entire Family <i>These policy guidelines address situations when the family is absent from the unit, but has not moved out of the unit. In cases where the family has moved out of the unit, HABC will terminate assistance in accordance with appropriate termination procedures contained in this Plan.</i></p>
--	-------------	---

FY2018 HCVP Admin Plan CURRENT POLICY	Page #	FY2019 HCVP Admin Plan AMENDMENTS PROPOSED POLICY
--	-----------	--

		<p><i>"Absence" means that no family member is residing in the unit. In order to determine if the family is absent from the unit, HABC may write letters to the family at the unit, telephone the family at the unit, interview neighbors, verify if utilities are in service or check with the post office.</i></p>
--	--	--

Chapter 15: Denial or Termination of Assistance (Continued)

<p>INSERT NEW SECTION on Definitions of Temporarily / Permanently Absent (moved from Chapter 6)</p> <p>Continued from Previous section</p>	<p>15-5</p>	<p><i>15.4.6 Absence of Entire Family (Continued)</i></p> <p><i>Families are required both to notify HABC before they move out of a unit and to give HABC information about any family absence from the unit. Families must notify HABC before leaving the unit if they are going to be absent from the unit for more than fourteen (14) consecutive days. If the entire family is absent from the assisted unit for more than twenty-nine (29) consecutive days, HABC may contact the landlord, or inspect the unit to confirm the absence. Housing assistance payments will terminate on the date the family vacated the unit. If it is determined that the unit is vacant, the participant will be referred for termination. HUD regulations require HABC to terminate assistance if the entire family is determined to have been absent from the unit for a period of more than one hundred and eighty (180) consecutive calendar days.</i></p> <p><i>A person with a disability may request an extension of time as an accommodation, subject to approval by the Deputy Chief or designee.</i></p> <p><i>If the absence, which resulted in termination of assistance, was due to a person's disability and HABC can verify that the person was unable to notify HABC in accordance with the family's responsibilities, and if funding is available, HABC may reinstate the family as an accommodation.</i></p> <p><i>15.4.7 Caretaker for Children</i></p> <p><i>If no parent remains in the household, and the appropriate agency has determined that another adult is to be brought in to the assisted unit to care for the children for an indefinite period, HABC will treat that adult as a temporary household member, for the first one hundred and eighty (180) consecutive days. If by the end of that period, court-awarded custody or legal guardianship has been awarded to the caretaker, the Voucher will be transferred to the caretaker. If the appropriate agency cannot confirm the guardianship status of the caretaker, HABC will determine the eligibility of the caretaker for the child/children and count the caretaker's income for TTP determination pending a final disposition. HABC will work with the appropriate service agencies and the landlord to</i></p>
--	-------------	---

FY2018 HCVP Admin Plan CURRENT POLICY	Page #	FY2019 HCVP Admin Plan AMENDMENTS PROPOSED POLICY
--	-----------	--

		<p><i>provide a smooth transition in these cases.</i></p> <p><i>If a member of the household is subject to a court order that restricts him/her from the home for more than sixty (60) consecutive days, the person will be considered permanently absent.</i></p> <p>15.4.8 Guests (copied from Chapter 2, Section 2.3.10) <i>A guest is defined as a person temporarily staying in the unit with the consent of the participant or other member of the household who has express or implied authority to so consent on behalf of the participant and is not considered part of the applicant household.</i></p>
--	--	---

Chapter 15: Denial or Termination of Assistance (Continued)

<p>INSERT NEW SECTION on Definitions of Temporarily / Permanently Absent (moved from Chapter 6)</p> <p>Continued from Previous section</p>	15-5	<p>15.4.8 Guests (Continued)</p> <p><i>Guests should not stay in a unit in excess of fourteen (14) consecutive days, or a total of ninety (90) days in a 12-month period without HABC approval. For any guest who has income and who remains in the unit for longer than the specified time, HABC will include that income in the calculation of total family income. HABC will determine the effective date for the participant’s annual, biennial, or triennial review, whichever applies.</i></p> <p><i>Any person, who has been in the unit more than fourteen (14) consecutive days without HABC approval, or a total of ninety (90) days in a 12-month period, will be considered to be living in the unit as an unauthorized household member.</i></p> <p><i>Guests who remain beyond this period and are considered unauthorized occupants, constitutes a violation of Family Obligations (for more information on Family Obligations, see Chapter 15, Section 15.5). Live-in aides may not have overnight guests.</i></p> <p>15.4.9 Visitors (Copied from Chapter 6, Section 6.6.8) <i>Any person, who has been in the unit more than fourteen (14) consecutive days without HABC approval, or a total of ninety (90) days in a 12-month period, will be considered to be living in the unit as an unauthorized household member.</i> <i>Determination of the unauthorized status will include any of the following:</i></p> <ol style="list-style-type: none"> <i>a. Absence of evidence of any other address will be considered verification that the visitor is a member of the household.</i> <i>b. Statements from neighbors and/or the landlord will be considered in making the determination.</i> <i>c. Use of the unit address as the visitor's current residence for any purpose that is not explicitly temporary shall be construed as permanent residence.</i>
--	------	---

FY2018 HCVP Admin Plan	Page	FY2019 HCVP Admin Plan AMENDMENTS
CURRENT POLICY	#	PROPOSED POLICY

<p><u>15.3 SCREENING AND TERMINATION FOR DRUG ABUSE AND OTHER CRIMINAL ACTIVITY</u></p> <p>15.3.4 HUD Definitions</p>	15-5	Remove sub-section levels; make section <u>15.5 HUD DEFINITIONS</u>
---	------	--

Chapter 15: Denial or Termination of Assistance (Continued)

<p>15.3.5 Standard for Violation</p> <p>HABC may deny participation in the program to applicants and terminate assistance to participants in cases where HABC determines that there is reasonable cause to believe that a household member is illegally using a drug...</p>	15-5	<p>Updating section # and adding “alcohol abuse” to language as per regulations:</p> <p><i>15.5.1 Standard for Violation</i></p> <p>HABC may deny participation in the program to applicants and terminate assistance to participants in cases where HABC determines that there is reasonable cause to believe that a household member is illegally using a drug <i>or abusing alcohol...</i></p>
<p>INSERT NEW SECTION under HUD Definitions</p>	15-7	<p>Under new section 15.5 HUD Definitions, add a new section regarding notice of denial of assistance:</p> <p><i>15.5.5 Notice of Denial of Assistance</i></p> <p><i>In any case where HABC decides to deny assistance to the family, HABC must give the family written notice which states:</i></p> <ul style="list-style-type: none"> • <i>The reason(s) for the denial;</i> • <i>The family’s right, if they disagree, to an Informal Review;</i> • <i>The date by which a request for an informal review must be received by HABC.</i>
<p><u>15.4 TERMINATION OF ASSISTANCE FOR PARTICIPANTS</u></p> <p>15.4.2 Terminating Assistance for Alcohol Abuse by Household Members</p> <p>...Assistance may be terminated if a household member is arrested / convicted / incarcerated for any alcohol-related criminal activity on or near the premises within any twelve (12) month period...</p>	15-7	<p>Update SECTION # and language as per J. Offley:</p> <p><u>15.6 TERMINATION OF ASSISTANCE FOR PARTICIPANTS</u></p> <p><i>15.6.2 Terminating Assistance for Alcohol Abuse by Household Members</i></p> <p>...Assistance may be terminated if a household member is arrested / convicted / incarcerated for any alcohol-related criminal activity <i>on or near-in the immediate vicinity of</i> the premises within any twelve (12) month period...</p>
<p><u>15.5 FAMILY OBLIGATIONS</u></p>	15-9	Update section and language to reflect current practice:

FY2018 HCVP Admin Plan CURRENT POLICY	Page #	FY2019 HCVP Admin Plan AMENDMENTS PROPOSED POLICY
--	-----------	--

<ul style="list-style-type: none"> • ... • The family must supply any information requested by HABC for use in a regularly scheduled reexamination or interim reexamination of family income and composition in accordance with HABC’s MTW requirements. • ... 		<p><u>15.7 FAMILY OBLIGATIONS</u></p> <ul style="list-style-type: none"> • ... • The family must supply any information requested by HABC <i>at any time; including</i> for use in a regularly scheduled reexamination or interim reexamination of family income and composition in accordance with HABC’s MTW requirements. • ...
---	--	--

Chapter 15: Denial or Termination of Assistance (Continued)

<p><u>15.5 FAMILY OBLIGATIONS</u></p> <p>15.5.2 Enforcing Family Obligations</p> <p><i>15.5.2.4 Notification of Eviction</i></p> <p>If the family submits a request for assistance to move and they did not notify HABC of an eviction within five (5) business days of receiving the Notice of Lease Termination, the move will be denied.</p>	15-11	<p>Update section and language to reflect current practice:</p> <p><u>15.7 FAMILY OBLIGATIONS</u></p> <p>15.7.2 Enforcing Family Obligations</p> <p><i>15.7.2.4 Notification of Eviction</i></p> <p>If the family submits a request for assistance to move and they did not notify HABC of an eviction within five (5) business days of receiving the Notice of Lease Termination, the move will be denied.</p>
---	-------	---

<p><u>15.5 FAMILY OBLIGATIONS</u></p> <p>15.5.2 Enforcing Family Obligations</p> <p><i>15.5.2.5 Proposed Additions to the Family</i></p> <p>HABC will deny a family's request to add additional family members who are:</p> <ul style="list-style-type: none"> ❖ ... ❖ Persons who have been part of a family whose assistance has been terminated under the Certificate or Voucher program. ❖ ... ❖ Persons who do not meet HABC’s definition of family. 	15-11	<p>Update section and language to reflect current practice:</p> <p><u>15.7 FAMILY OBLIGATIONS</u></p> <p>15.7.2 Enforcing Family Obligations</p> <p><i>15.7.2.5 Proposed Additions to the Family</i></p> <p>HABC will deny a family's request to add additional family members who are:</p> <ul style="list-style-type: none"> ❖ ... ❖ Persons who have been part of a family whose <i>had</i> assistance <i>that</i> has been terminated under the Certificate or Voucher program. ❖ ... ❖ Persons who do not meet HABC’s definition of family.
---	-------	--

Chapter 16: Owner Disapproval and Restriction

<p><u>16.2 DISAPPROVAL OF OWNER</u></p> <p>HABC will disapprove of owner participation in the program for the following reasons:</p>	16-1	<p>Move and add language to 4th bullet to clarify:</p> <p>HABC will disapprove of owner participation in the program for the following reasons:</p>
---	------	--

FY2018 HCVP Admin Plan CURRENT POLICY	Page #	FY2019 HCVP Admin Plan AMENDMENTS PROPOSED POLICY
--	-----------	--

<p>❖ ...</p> <p>❖ Unless their lease was effective prior to June 17, 1998, the owner may not be a parent, child, grandparent, grandchild, sister or brother of any family member. HABC will waive this restriction as a reasonable accommodation for a family member who is a person with a disability.</p> <p>In cases where the owner and tenant bear the same last name, HABC may, at its discretion, require the family and or owner to certify whether they are related to each other in any way.</p>		<p>❖ ...</p> <p>❖ Unless their lease was effective prior to June 17, 1998, the owner may not be a parent, child, grandparent, grandchild, sister or brother of any family member. HABC will waive this restriction as a reasonable accommodation for a family member who is a person with a disability. <u>In cases where the owner and tenant bear the same last name, HABC may, at its discretion, require the family and or owner to certify whether they are related to each other in any way.</u> <i>If relation is found by blood or marriage, HABC may deny owner approval.</i></p> <p>In cases where the owner and tenant bear the same last name, HABC may, at its discretion, require the family and or owner to certify whether they are related to each other in any way.</p>
--	--	--

Chapter 16: Owner Disapproval and Restriction (Continued)

<p><u>16.3 OWNER RESTRICTIONS AND PENALTIES</u></p> <p>16.3.1 Border of Responsibility</p>	<p>16-2</p>	<p>Correct name of section:</p> <p>16.3.1 Border Board of Responsibility</p>
<p><u>16.4 CHANGE IN OWNERSHIP</u></p> <p>... HABC will process a change of ownership only upon the written request of the new owner. The request must be accompanied by a copy of the escrow statement or other document showing the transfer of title, recorded deed and the Employee Identification Number or Social Security number of the new owner.</p> <p>The additional information required to complete a change in ownership is listed below:</p> <ol style="list-style-type: none"> 1) Completed W-9 Form for deeded owner and managing agent (form may be obtained at www.irs.gov). 2) Photo identification (must be valid, clear, and legible). 3) Management Agreement (if applicable). 4) Note: If a management agreement is being cancelled, a cancellation letter from the Management Company, or owner, must be submitted. 5) Transfer of Ownership or Management Form 6) Articles of Organization for LLC, Partnerships, or Corporations (if applicable). 7) Operating Agreement for LLC, Partnerships, or Corporations (if applicable). 8) Electronic Funds Transfer Request Form (Direct Deposit Form). 9) In cases where there is a joint ownership of the 	<p>16-3</p>	<p>Update section and language to reflect current practice:</p> <p>... HABC will process a change of ownership only upon the written request notification by of the <i>previous owner, the previous property management company, or the current</i> new owner. The request must be accompanied by a copy of the escrow statement or other document showing the transfer of title, recorded deed and the Employee Identification Number (<i>EIN</i>) or Social Security number (<i>SSN</i>) of the new owner.</p> <p>The additional information required to complete a change in ownership is listed below:</p> <ol style="list-style-type: none"> 1) Completed W-9 Form for deeded owner and managing agent (form may be obtained at www.irs.gov). 2) <i>Proof of Tax ID Number (social security card or EIN notice from IRS).</i> 3) <i>Government issued</i> photo identification (must be valid, clear, and legible) <i>for the Property Owner, Managing Agent, or Authorized Signatory.</i> 4) <i>Proof of ownership – a copy of the executed (signed) settlement papers, recorded deed, court documents, or documentation from the State Department of Assessments & Taxation (SDAT).</i> 5) Management Agreement (if applicable). <p>Note: If a management agreement is being cancelled, a cancellation letter from the Management Company, or owner, must be submitted.</p> <ol style="list-style-type: none"> 6) <i>Owner and Management Company's current contact information including phone numbers and email addresses.</i> 7) <i>Tenant's name and address.</i> 8) <i>Completed</i> Transfer of Ownership or Management Form 9) Articles of Organization for LLC, Partnerships, or

FY2018 HCVP Admin Plan CURRENT POLICY	Page #	FY2019 HCVP Admin Plan AMENDMENTS PROPOSED POLICY
--	-----------	--

<p>property, and the names of both partners will not be on the account, a written statement from both partners is required verifying the account set-up agreement.</p> <p>10) Current contact information, telephone number, cell phone number, and email address.</p>		<p>Corporations (if applicable).</p> <p>10) Operating Agreement for LLC, Partnerships, or Corporations (if applicable).</p> <p>11) Electronic Funds Transfer Request Form (Direct Deposit Form) – <i>must include a voided check or Savings deposit slip (mandatory).</i></p> <p>12) In cases where there is a joint ownership of the property, and the names of both partners will not be on the account, a written statement from both partners is required verifying the account set-up agreement.</p> <p><i>13) For Estates – a death certificate, State of Maryland Letters of Administration, and proof of the EIN for the Estate.</i></p> <p>14) Current contact information, telephone number, cell phone number, and email address.</p>
--	--	---

Chapter 16: Owner Disapproval and Restriction (Continued)

<p><u>16.4 CHANGE IN OWNERSHIP (continued from section above)</u></p> <p>If the new owner does not want an assignment of the contract, the HABC will terminate the HAP contract with the old owner, since they are no longer the owner. The new owner may offer the family a new assisted lease. The family may elect to enter into the new lease or move to another unit.</p>	16-3	<p>Update language to reflect current practice:</p> <p>If the new owner does not want an assignment of the contract, the HABC will terminate the <i>existing</i> HAP contract with the old owner, since they are no longer the owner and if warranted, execute a new HAP Contract under the new ownership. The new owner may offer the family a new assisted lease; the family may elect to enter into the new lease or move to another unit. <i>If the new owner declines participation in the program, and/or the family decides to move to another unit, a 30-day notice to vacate should be submitted and the family is responsible for getting a voucher to move.</i></p>
---	------	---

Chapter 17: Owner or Family Debts to HABC

<p><u>17.1 INTRODUCTION</u></p> <p>...It is HABC policy to meet the informational needs of owners and families, and to communicate the program rules in order to avoid owner and family debts. Before a debt is assessed against a family or owner, the file must contain documentation to support HABC claim that the debt is owed. The file must further contain written documentation of the method of calculation, in a clear format for review by the owner, the family or other interested parties.</p>	17-1	<p>Update language to reflect current practice:</p> <p>...It is HABC policy to meet the informational needs of owners and families, and to communicate the program rules in order to avoid owner and family debts. Before a debt is assessed against a family or owner, the file must contain documentation <i>must be present</i> to support HABC claim that the debt is owed. The file must Further, contain written documentation <i>must be present showing of</i> the method of calculation, in a clear format for review by the owner, the family or other interested parties.</p>
<p><u>17.2 PAYMENT AGREEMENT FOR FAMILIES</u></p> <p>... HABC will prescribe the terms of the payment agreement, including determining whether to enter into a payment agreement with the family based on the circumstances surrounding the debt to HABC.</p> <p>...The maximum amount for which HABC will</p>	17-1	<p>Moved paragraph from Section 17.3 (3rd bullet) to this section 17.2 to reflect current practice:</p> <p><i>If the payment agreement is approved, the repayment amount must comply with HUD regulations as stated in PIH Notice 2010-19 (HA), Section 16 which states “the monthly retroactive rent payment plus the amount of rent the tenant pays at the time the repayment agreement is executed should be affordable and not exceed 40% of the family’s ‘monthly</i></p>

FY2018 HCVP Admin Plan CURRENT POLICY	Page #	FY2019 HCVP Admin Plan AMENDMENTS PROPOSED POLICY
--	-----------	--

<p>enter into a payment agreement will be \$2,500.</p> <p>The maximum length of time HABC...</p>		<p><u>adjusted income.”</u></p> <p>... HABC will prescribe the terms of the payment agreement, including determining whether to enter into a payment agreement with the family based on the circumstances surrounding the debt to HABC.</p> <p>...The maximum amount for which HABC will enter into a payment agreement will be \$2,500. <i>An initial down payment will be required as per the payment schedule established in Section 17.6, unless otherwise approved by the Deputy Chief for HCVP or designee.</i></p>
--	--	---

Chapter 17: Owner or Family Debts to HABC

<p><u>17.2 PAYMENT AGREEMENT FOR FAMILIES</u></p> <p>17.2.1 No Offer of Payment Agreement</p> <p>The circumstances in which HABC will not enter into a payment agreement are, as follows:</p> <ul style="list-style-type: none"> ❖ If the family already has a payment agreement in place; ❖ If HABC determines that the family committed program fraud; ❖ If HABC determines that the debt is so large that it would take more than eighteen (18) months to repay. 	<p>17-2</p>	<p>Update language to reflect current practice:</p> <p>The circumstances in which HABC will <i>may</i> not enter into a payment agreement are, as follows:</p> <ul style="list-style-type: none"> ❖ If the family already has a payment agreement in place; ❖ If HABC determines that the family committed program fraud; ❖ If HABC determines that the debt is <i>greater than \$2,500, or is</i> so large that it would take more than eighteen (18) months to repay; <i>and</i> ❖ <i>If HABC determines that the family is unable to meet the payment schedule, to include the initial payment requirements, unless otherwise directed by the Deputy Chief for HCVP or designee.</i>
<p><u>17.3 DEBTS OWED FOR CLAIMS</u></p> <p>If a family owes money to HABC for claims paid to an owner:</p> <ul style="list-style-type: none"> ❖ HABC will review the circumstances resulting in the overpayment and decide whether the family must pay the full amount. ❖ HABC may enter into a Payment Agreement. ❖ If the payment agreement is approved, the repayment amount must comply with HUD regulations as stated in PIH Notice 2010-19 (HA), Section 16 which states “the monthly retroactive rent payment plus the amount of rent the tenant pays at the time the repayment agreement is executed should be affordable and not exceed 40% of the family’s monthly 	<p>17-2</p>	<p>3rd bullet removed from Section 17.3 and pasted into Section 17.1</p> <p><u>17.3 DEBTS OWED FOR CLAIMS OVERPAYMENTS</u></p> <p>If a family owes money to HABC for claims paid <i>overpayments</i> to an owner:</p> <ul style="list-style-type: none"> ❖ HABC will review the circumstances resulting in the overpayment and decide whether the family must pay the full amount. ❖ HABC may enter into a Payment Agreement. ❖ If the payment agreement is approved, the repayment amount must comply with HUD regulations as stated in PIH Notice 2010-19 (HA), Section 16 which states “the monthly retroactive rent payment plus the amount of rent

FY2018 HCVP Admin Plan CURRENT POLICY	Page #	FY2019 HCVP Admin Plan AMENDMENTS PROPOSED POLICY
--	-----------	--

adjusted income.”		the tenant pays at the time the repayment agreement is executed should be affordable and not exceed 40% of the family’s monthly adjusted income.”
-------------------	--	--

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

<p><u>17.3 DEBTS OWED FOR CLAIMS</u></p> <p>17.3.1 Late Payments</p> <p>...If the family requests a move to another unit and has a payment agreement in place for the payment of an owner claim which is not in arrears, the family will be required to pay the balance in full prior to the issuance of a voucher.</p> <p>If the family requests a move to another unit and is in arrears on a payment agreement for the payment of an owner claim the family will be required to pay the balance in full, or be terminated from the program.</p>	17-2	<p>Removed subsection 17.3.1 to create Section 17.4; updated language to clarify executive review requirements.</p> <p><u>17.4 LATE PAYMENTS FOR PAYMENT AGREEMENTS</u></p> <p>...If the family requests a move to another unit and has a payment agreement in place for the payment of an owner claim which is not in arrears, the family will be required to pay the balance in full <i>undergo executive review to determine voucher issuance prior to the issuance of a voucher.</i></p> <p>If the family requests a move to another unit and is in arrears on a payment agreement, for the payment of an owner claim the family will be required to pay the balance in full, or be terminated from the program.</p>
<p><u>17.4 DEBTS DUE TO MISREPRESENTATIONS / NON-REPORTING OF INFORMATION</u></p> <p>17.4.2 Program Fraud</p> <p>If a family owes an amount that equals or exceeds \$500.00 as a result of program fraud, the case will be referred to the Internal Audits and Investigations Unit (IAIU)...</p>	17-3	<p>Update section # and language to reflect current practice:</p> <p><u>17.5 DEBTS DUE TO MISREPRESENTATIONS / NON-REPORTING OF INFORMATION</u></p> <p>17.5.2 Program Fraud</p> <p>If a family owes an amount that equals or exceeds \$500.00 as a result of program fraud, the case will be referred to the Internal Audits and Investigations Unit (IAIU)...</p>
<p><u>17.6 OWNER DEBTS TO HABC</u></p> <p>If HABC determines that the owner has retained housing assistance or claim payments the owner is not entitled to, HABC may reclaim the amounts</p>	17-4	<p>Update section # and language to clarify current practice:</p> <p><u>17.7 DEBTS DUE TO MISREPRESENTATIONS / NON-REPORTING OF INFORMATION</u></p>

FY2018 HCVP Admin Plan	Page	FY2019 HCVP Admin Plan AMENDMENTS
CURRENT POLICY	#	PROPOSED POLICY

<p>from future housing assistance or claim payments owed the owner for any units under contract...</p>		<p>If HABC determines that the owner has retained housing assistance or claim payments the owner is not entitled to, HABC may reclaim the amounts from future housing assistance or claim payments owed <i>to</i> the owner for any <i>other subsidized</i> units under contract...</p>
--	--	---

Chapter 18: Complaints and Appeals

<p><u>18.2 INQUIRIES TO THE HABC</u></p> <p>HABC will respond promptly to inquiries from families, owners, employees, and members of the public. All inquiries will be logged by customer service and close-out will be documented. Applicant families may be entitled to an informal review to discuss HABC determinations that affect their eligibility. Participant families are eligible to request an informal hearing regarding any determination made by HABC regarding their continued participation in the HCVP.</p> <p>HABC hearing procedures will be provided to families in the briefing packet.</p>	<p>18-1</p>	<p>Update language to clarify current practice:</p> <p><u>18.2 INQUIRIES TO THE HABC</u></p> <p>HABC will respond promptly to inquiries from families, owners, employees, and members of the public. All inquiries will be logged by customer service and close-out will be documented, <i>re researched and resolved</i>. Applicants families may be entitled to request an informal review to discuss HABC determinations that affect their eligibility. Participants families are eligible to may request an informal hearing regarding any to discuss HABC determinations made by HABC regarding that affect their continued participation in the HCVP.</p> <p>HABC <i>informal review and informal</i> hearing procedures will be provided to families in the briefing packet.</p>
<p><u>18.3 PREFERENCE DENIALS</u></p> <p>When HABC denies a preference to an applicant, and the applicant disagrees with the decision, HABC will offer the applicant the opportunity to discuss the preference denial; however such discussion will not prohibit the applicant from requesting an informal review. This is different from an informal review or hearing. The person who made the decision to deny the preference, or any other HABC representative, may conduct the meeting. The meeting is limited only to the circumstances pertaining to the preference denial.</p>	<p>18-1</p>	<p>Update language to clarify current practice:</p> <p><u>18.3 PREFERENCE APPLICANT DENIALS</u></p> <p>When HABC denies a preference to an applicant, and the applicant disagrees with the decision, HABC will offer the applicant the opportunity to discuss the preference denial; however such discussion will not prohibit the applicant from requesting <i>may request</i> an informal review. This is different from an informal review or hearing. The person who made the decision to deny the preference, or any other HABC representative, may conduct the meeting. The meeting is limited only to the circumstances pertaining to the preference denial. <i>The informal review may be conducted by any person or persons designated by HABC, other than the person who made or approved the decision under review or a subordinate of that individual.</i></p>

FY2018 HCVP Admin Plan CURRENT POLICY	Page #	FY2019 HCVP Admin Plan AMENDMENTS PROPOSED POLICY
--	-----------	--

<p><u>18.4 INFORMAL REVIEW PROCEDURES FOR APPLICANTS</u></p> <p>Reviews are provided for applicants who are denied assistance before the effective date of the HAP contract. The exception is that when an applicant is denied assistance for citizenship or eligible immigrant status, the applicant is entitled to an informal review.</p>	18-1	<p>Update language to reflect current practice:</p> <p><i>Informal</i> reviews are provided for applicants who are denied assistance before the effective date prior to the execution of the HAP contract, <i>and who have requested an informal review</i>. The exception is that when an applicant is denied assistance for citizenship or eligible immigrant status, the applicant is entitled to an informal review.</p>
---	------	---

Chapter 19: SPECIAL HOUSING TYPES

<p><u>19.1 INTRODUCTION</u></p> <p>HABC may approve any of the following types of housing in the voucher program, in accordance with the requirements of the program, and as specified in Chapter 20:</p> <ul style="list-style-type: none"> ❖ ... ❖ Group homes ❖ Congregate housing facilities (only the shelter rent is assisted) ❖ ... ❖ Cooperative Housing ❖ ... <p>HABC will permit the use of special housing types when requested, as a reasonable accommodation for persons with disabilities.</p>	19-1	<p>Update language to reflect current practice:</p> <p>HABC may approve any of the following types of housing in the voucher program, in accordance with the requirements of the program, and as specified in Chapter 20:</p> <ul style="list-style-type: none"> ❖ ... ❖ Group homes, <i>as approved by the Deputy Chief for HCVP or designee</i> ❖ Congregate housing facilities (only the shelter rent is assisted), <i>as approved by the Deputy Chief for HCVP or designee</i> ❖ ... ❖ Cooperative Housing, <i>as approved by the Deputy Chief for HCVP or designee</i> ❖ ... <p>HABC will <i>may</i> permit the use of special housing types when requested, as a reasonable accommodation for persons with disabilities, <i>upon approval by the Deputy Chief for HCVP or designee</i>.</p>
<p><u>19.3 CONGREGATE HOUSING</u></p> <p>An elderly person or a person with disabilities may reside in a congregate housing unit. HABC may approve a family member or live-in aide to reside with the elderly person or person with disabilities...</p>	19-2	<p>Update language to reflect current practice:</p> <p>An elderly person or a person with disabilities may reside in a congregate housing unit, <i>upon approval by the Deputy Chief for HCVP, or designee</i>. HABC may approve a family member or live-in aide to reside with the elderly person or person with disabilities...</p>
<p><u>19.4 GROUP HOMES</u></p> <p>An elderly person or a person with disabilities may reside in a State-approved group home. If approved</p>	19-2	<p>Update language to reflect current practice:</p> <p>An elderly person or a person with disabilities may reside in a State-approved group home, <i>upon approval by the Deputy</i></p>

FY2018 HCVP Admin Plan CURRENT POLICY	Page #	FY2019 HCVP Admin Plan AMENDMENTS PROPOSED POLICY
--	-----------	--

by HABC, a live-in aide may reside with a person with disabilities...		<i>Chief for HCVP, or designee.</i> If approved by HABC, a live-in aide may reside with a person with disabilities...
<u>19.5 COOPERATIVE HOUSING</u> HABC will approve a family living in cooperative housing if it is determined that assistance under the program will help maintain affordability of the cooperative unit for low-income families.	19-2	Update language to reflect current practice: HABC will <i>may</i> approve a family living in cooperative housing if it is determined that assistance under the program will help maintain affordability of the cooperative unit for low-income families.
<u>19.7 HOMEOWNERSHIP</u> Tonya Small will need to update	19-6	TO BE REVIEWED BY TONYA SMALL

Chapter 20: Project-Based Assistance Program

<u>20.4 PROPOSAL SELECTION PROCESS</u> <u>20.5 SUBSIDY LAYERING REVIEW</u> <u>20.6 SITE SELECTION STANDARDS</u> <u>20.10 FUNDING & INCENTIVSE</u> <u>20.11 NEW PROJECT-BSAED UNITS CRITERIA</u> <u>20.12 NEW PROJECT-BASED UNITS UNDER MTW</u>	20-2 20-6 20-7	TO BE REVIEWED BY PLANNING & DEVELOPMENT
<u>20.7 FAMILY ELIGIBILITY AND OTBAINING A PROJECT-BASED VOUCHER</u> 20.7.4 Subsidy Limitations ...The following are exceptions to the above rule: a) A participant in an HABC project-based transitional housing program or an HABC Moderate Rehabilitation (MOD) transitional housing program who successfully completes that program may request and is eligible to receive a tenant-based voucher subject to tenant-based rules and the availability of funds. A participant in an HABC conventional project-based housing program (non-transitional) or an HABC MOD program (non-transitional) who is in good standing and has lived in an HABC project-based unit for at least 12 months may request and is eligible to receive a tenant-based voucher subject to	20-5	Update language to reflect current practice: ...The following are exceptions to the above rule: a) A participant in a HABC project-based transitional housing program (<i>THP</i>) or a HABC Moderate Rehabilitation (MOD) transitional housing program THP who <i>is in good standing with the THP and HABC HCVP requirements for at least twelve (12) months and who successfully completes that program may request and is eligible to receive a tenant-based voucher subject to tenant-based rules and the availability of funds.</i> b) A participant in a HABC conventional project-based housing program (non-transitional) or a HABC MOD program (non-transitional) who is in good standing and has lived in a HABC project-based <i>or MOD</i> unit for at least 12 months may request and is eligible to receive a tenant-based voucher subject to tenant-based rules and the availability of funds. <i>All participants must remain in good standing with the conventional program and HABC HCVP requirements while on the TBV waiting list until a</i>

FY2018 HCVP Admin Plan	Page	FY2019 HCVP Admin Plan AMENDMENTS
CURRENT POLICY	#	PROPOSED POLICY

<p>tenant-based rules and the availability of funds.</p> <p>b) A participant in an HABC project-based program where a contract between HABC and the property owner is terminated shall be issued a tenant-based voucher subject to tenant-based program rules and the availability of funds.</p>		<p><i>voucher has been issued.</i></p> <p>c) A participant in a HABC project-based <i>or MOD</i> program where a contract between HABC and the property owner is terminated shall be issued a tenant-based voucher subject to tenant-based program rules and the availability of funds.</p>
<p><u>20.8 SET-ASIDE VOUCHERS FOR FAMILIES WITH DISABILITIES</u></p> <p><u>20.9 LONG TERM AFFORDABLE HOUSING UNITS</u></p> <p>TO BE REVIEWED BY AMY WILKINSON</p>	<p>20-5</p>	<p>TO BE REVIEWED BY AMY WILKINSON</p>

**Appendix I:
Non-MTW Information**

APPENDIX I: Non MTW Information

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 2018. 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), NED 2P, FUPs, 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 force account labor (HABCco)
- Resident Service Grant (Our House-Friends of the Family).

Estimated Sources of Non-MTW Funding for FY 2019

Sources	
FDS Line Item Name	Dollar Amount
Total Tenant Revenue	\$ 1,791,394
HUD PHA Operating Grants	\$ 13,722,161
Capital Grants	\$ 10,669,002
Total Fee Revenue	\$ -
Interest Income	\$ -
Gain or Loss on Sale of Capital Assets	\$ -
Other Income	\$ 17,006,824
Total Revenue	\$ 43,189,381

APPENDIX I: Non MTW Information

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 \$13,047,958
 - Ongoing Administrative Fees Earned estimated in the amount of \$508,649
3. Interest Income is based on a short-term interest rate on estimated average daily cash balance.
4. Other Income includes the following:
 - HABC's construction and maintenance activities \$1,878,579.
 - ROSS grant activities from previously awarded grants \$658,488.
 - Jobs Plus \$750,877
 - State and Local activities \$4,600,310 for the City of Baltimore instantaneous reimbursement of pass-through activities and State and Local Resident Services activities
 - Business Activities of \$10,304,030, which primarily includes \$8,416,716 for HABC's next EPC and \$1,878,579 for HABC's construction unit

Estimated Uses of Non-MTW Funding for FY 2019

Uses	
FDS Line Item Name	Dollar Amount
Total Operating - Administrative	\$ 2,892,988
Management Fee Expense	\$ -
Allocated Overhead	\$ 416,870
Total Tenant Services	\$ 2,110,605
Total Utilities	\$ 234,661
Labor	\$ -
Total Ordinary Maintenance	\$ 4,143,414
Total Protective Services	\$ 45,348
Total Insurance Premiums	\$ 144,146
Total Other General Expenses	\$ 1,720,570
Total Interest Expense and Amortization Cost	\$ -
Total Extraordinary Maintenance	\$ -
Housing Assistance Payments	\$ 13,047,958
Depreciation Expense	\$ 757,008
All Other Expenses	\$ -
Total Expenses	\$ 25,513,569

Total Expenses	\$25,513,569
Less: Depreciation Expense	\$(757,008)
Capital Hard Cost	\$19,090,209
MTW Uses of Funds	\$43,846,770

APPENDIX I: Non MTW Information

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 2019 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-account labor department (HABC). 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 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	26	27	7	0	0	80	General	5	0
MD002/TBD Bailey Units	0	10	0	0	0	0	0	10	Disabled	1	0

Total Public Housing Units to be Added **90**

* 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
MD002/0103 Midtown Scattered Sites	23	Obsolete and non-viable scattered sites units
MD002/0108 Upton Scattered	23	Obsolete and non-viable scattered sites units
MD002/0109 Stricker Scattered Sites	21	Obsolete and non-viable scattered sites units
MD002/Various Scattered Sites	433	Obsolete and non-viable scattered sites units
MD002/0006 Gilmor Homes	132	Obsolete and non-viable units.
MD002/0009 O'Donnell Heights	74	These units were scheduled for demolition as part of the O'Donnell Heights redevelopment effort; however, due to water supply breaks, and severe storm and ground water infiltration into these units HABC has obtained HUD approval to demolish the units which will occur in FY 2019.
MD002/0009 O'Donnell Heights	0	6 lots to be sold to developer to build for-sale housing. A plan to dispose of these lots was noted in the FY 2017 Annual Plan; however, HABC will submit a disposition application to HUD in FY 2018.
MD/002/0010 Somerset Homes	0	8.64 acres of vacant land
MD002/0042 Somerset Extension	60	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
MD002/0118 Homes for Arundel (Family)	58	RAD Conversion
Total Number of Units to be Removed	1459	

In the FY 2018 MTW Annual Plan, HABC projected that investments and development activities would result in the demolition and/or disposition of 442 scattered sites units. Of those 442 units, 9 were conveyed to the City of Baltimore in FY 2018. The remaining 433, noted above, are units projected to be disposed of in FY 2019.

*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	
Somerset Homes Phase I	50	50 PBV for Perkins Replacement Units as part of the Perkins Somerset Old Town Transformation Plan	
Somerset Extension	7	After redevelopment Somerset Extension will have 65 units, of which 58 will be RAD and 7 will be designated for non-elderly persons with disabilities, subsidized with HABC project based voucher assistance.	
Mount Winans/AHG	65	This will be new construction on land owned by the City of Baltimore. Once completed the site will contain 65 units for veterans.	
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. Currently under an AHAP with completion expected sometime during the 2nd quarter of FY 2019.	
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. Currently under an AHAP with completion expected sometime during the 2nd quarter of FY 2019.	
North Avenue Gateway	10	<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 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.</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> <p>Currently under an AHAP with completion expected sometime during the 2nd quarter of FY 2019.</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, 11 units will be reserved for tenants with incomes of 30% or less than the AMI. Currently under an AHAP with completion expected sometime during the 2nd quarter of FY 2019.	
Paca	82	82 units located at 116-120 North Paca Street developed by Somerset Development Company, LLC is in pre-development. Sixty-three (63) units will be reserved for veterans and 19 will be reserved for homeless families.	
Marian House	6	Six units for homeless persons	
Greenmount & Chase	15	Located in the 700 block of East Chase Street, this will be new construction of 60 units 50 of which will be affordable and 10 of which will be for market-rate rental. Of the 50 affordable units 15 will be available for families with incomes less than 30% of AMI. HABC will subsidize the 15 units with PBVs nine (9) of which will be designated for NEDs and six (6) of which will be designated for the formerly homeless.	
Walbrook	11	10 PBV units located at 2636 Walbrook Avenue developed by Osprey Property Company LLC and Coppin Height Community Development Corporation are in pre-development.	
Anticipated Total New Vouchers to be Project-Based	297	Anticipated Total Number of Project-Based Vouchers Committed at the End of the Fiscal Year (Does not include Thompson).	2,240
		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).	2,115

*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

HABC has included an update to the Asset Management Table in Appendix B that describes the current status of each public housing site; outlines certain funding and development opportunities and risk factors that will be monitored over the life of the MTW Demonstration; and, describes possible outcomes and development activities. The Asset Management Table identifies 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. Properties approved for RAD Phases I and II are identified in the Asset Management Table.

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

In FY 2019, 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.); (ii) perform major renovations at various developments and a portion of the scattered site inventory to further reduce vacancies; and (iii) repair/replace 504 ramps. In addition, in FY 2019 HABC may continue to: (i) study the conditions of its scattered sites portfolio to determine long range planning goals; (ii) investigate and repair drainage and erosion problems at various sites; address trip hazards; and (iii) implement its environmental program that includes the continued testing for lead based paint and abatement of asbestos as required

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	6,412	76,944
Federal MTW Voucher (HCV) Units to be Utilized	13,200	158,400
Number of Units to be Occupied/Leased through Local, Non-Traditional, MTW Funded, Property-Based Assistance Programs **	135	1620
Number of Units to be Occupied/Leased through Local, Non-Traditional, MTW Funded, Tenant-Based Assistance Programs **	4,311	51,732
Total Households Projected to be Served	24,058	288,696

Includes 328 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's projected adjusted occupancy rate for MTW public housing inventory and leasing as of December 31, 2019 will be 97%. The total number of units under an ACC with HUD will be 8,069 as of June 30, 2018 and 6,671 as of December 31, 2019, 6,538 of which will be available for occupancy. The total number of MTW public housing units to be leased as of December 31, 2019 is 6,342 (the decrease in leased units is due to the disposition of 433 obsolete and non-viable scattered sites units in addition to the RAD conversion of 753 public housing units in FY 2019, and the demolition or disposition of 212 public housing units).

Housing Choice Voucher Program	<p>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 in CY2018 (this funding limitation does not affect Thompson-MTW, FUP, NEDs II, HUD-VASH, New Construction or Moderate Rehabilitation vouchers). Uncertainty concerning the level of available HAP funding to be provided to HABC for CY 2017 2018 is an additional contributing factor in determining projected utilization.</p> <p>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 the 850 tenant based vouchers leased to NEDs. HABC currently has 101,900 unit months leased and anticipates the full 102,000 unit months leased will be achieved by the end of September 2018 for NED participants.</p>
--------------------------------	--

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	24,210	Closed	No
Federal MTW Housing Choice Voucher Units: Project-Based	Site-Based	7,686	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	24,174	Closed	Yes. HABC plans to update and purge the waiting list after which it will be reopened in FY 2019.
Federal MTW Public Housing and HCVP Units	Merged	4,850	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	14,574	Closed	No. This wait list closed 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.

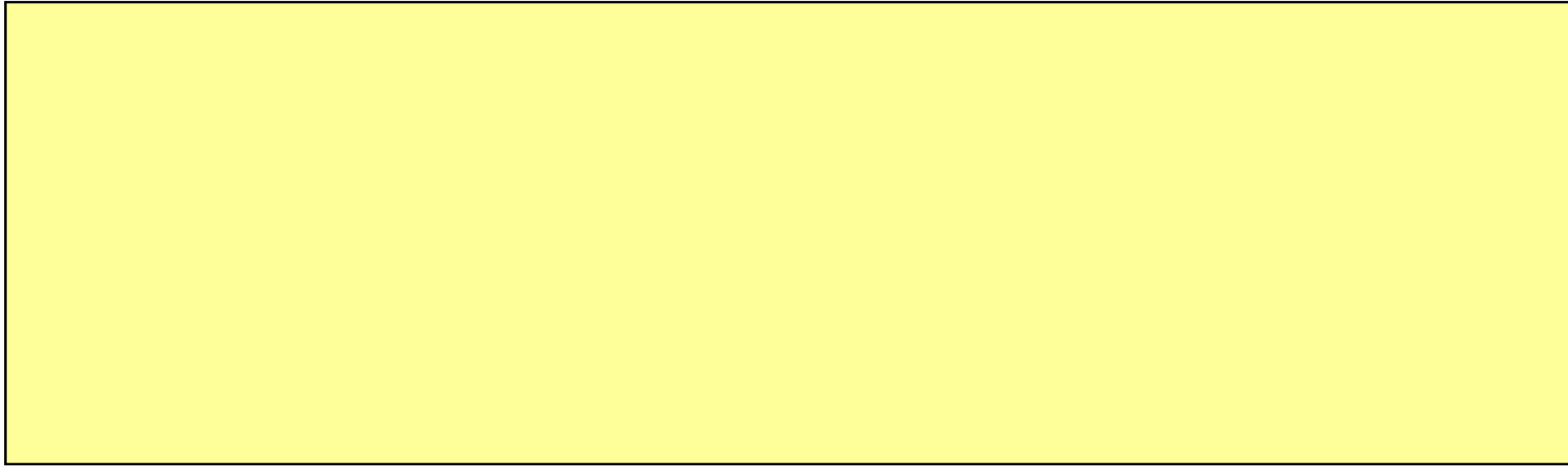
If Local, Non-Traditional Housing Program, please describe:

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.



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	\$22,186,437
70600	HUD PHA Operating Grants	\$295,271,105
70610	Capital Grants	\$19,330,308
70700 (70710+70720+70730+70740+70750)	Total Fee Revenue	\$0
71100+72000	Interest Income	\$502,291
71600	Gain or Loss on Sale of Capital Assets	\$0
71200+71300+71310+71400+71500	Other Income	\$719,177
70000	Total Revenue	\$338,009,318

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	\$36,875,120
91300+91310+92000	Management Fee Expense	\$2,626,818
91810	Allocated Overhead	(\$416,870)
92500 (92100+92200+92300+92400)	Total Tenant Services	\$1,619,632
93000 (93100+93600+93200+93300+93400+93800)	Total Utilities	\$17,275,201
93500+93700	Labor	\$0
94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	\$33,472,870
95000 (95100+95200+95300+95500)	Total Protective Services	\$201,649
96100 (96110+96120+96130+96140)	Total insurance Premiums	\$2,327,238
96000 (96200+96210+96300+96400+96500+96600+96800)	Total Other General Expenses	\$9,376,182
96700 (96710+96720+96730)	Total Interest Expense and Amortization Cost	\$3,621,323
97100+97200	Total Extraordinary Maintenance	\$605,150
97300+97350	Housing Assistance Payments + HAP Portability-In	\$214,288,534
97400	Depreciation Expense	\$21,631,473
97500+97600+97700+97800	All Other Expenses	
90000	Total Expenses	\$343,504,320

Describe the Activities that Will Use Only MTW 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 2019 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.

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 2019 are included in Appendix C. The indirect cost rate for 2019 will be 13.21% for MTW and 12.38% 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

[Empty yellow box for describing activities]

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?

Yes

No

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

Yes

or

No

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?

Yes

or

No

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

Appendix K
FY 2019 Annual Plan
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 Independence – Enable residents to achieve economic self-sufficiency by providing opportunities for employment, training and increased income

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

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

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

Staff Development and Empowerment – Staff will continue to acquire the skills and knowledge for personal and professional development encompassing all types of facilitated learning opportunities

Marketing and Promotion – Conduct a comprehensive marketing campaign that promotes the services and successes of the Office of Resident Services

Past Performance FY 2016 and 2017

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- 383; Job Placements—260; Average hourly wage: \$10.84

- 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—586; Graduates—62; Average escrow payout--\$6,892

- 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—102; Youth development activities—1,785
Youth Summit attendance—690; Youth Employment - 219

Appendix K
FY 2019 Annual Plan
The Office of Resident Services

- 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: 8,378

- Resource Development—this unit seeks and obtains grants for services to residents. During these years a series of grants resulted in \$5,609,304

New Initiatives - 2019

In its never-ending quest for funding and additional services for housing residents, the Office of Resident Services will collaborate to offer one new initiative to our residents:

Connect Home

ConnectHome is a public-private collaboration to narrow the digital divide for families with school-age children who live in HUD-assisted housing. The program seeks to bring affordable broadband access, technical training, digital literacy programs and electronic devices to public housing and Housing Choice Voucher families.

Since the program's inception, Comcast has joined the initiative and in partnership with HUD has collaborated to close the digital divide for up to two million HUD-assisted families. Now, public housing and Housing Choice Voucher HUD-assisted residents living in Comcast's service area will have access to low-cost internet service through a signature program entitled Internet Essentials. Internet Essentials is Comcast's high-speed internet adoption program for low-income families which provides internet service to low-income families for \$9.95/month.

The Housing Authority of Baltimore City (HABC) along with 27 other public housing authorities nationwide was chosen as a pilot site for ConnectHome.

New Strategies - 2019

Each year, we have an opportunity to examine the successes and challenges of the services we provide; and discover best practices and opportunities to enhance the quality of such services. Two areas we would like to focus on are:

- Youth Development – to expand our realm of services and support to our youth council; youth leadership summit; youth employment and training; and support to our Rising Star Scholarship applicants and awardees.
- Financial Education - enhance our relationship with local banks and financial institutions to broaden opportunities for financial education and banking services

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

**Appendix K
FY 2019 Annual Plan
The Office of Resident Services**

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

Service Program Area	Projected # Residents Served	
Employment Services	Enrollment Total # Served	450
	Employment Services	500
	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	525
	Graduates	30
	New Escrow Accounts	35
	Home Ownership Education Sessions Attended	30
	Financial Literacy Management Education Sessions Attended	100

**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

Appendix K
FY 2019 Annual Plan
The Office of Resident Services

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.

Jobs Plus Program—HABC was awarded a four year grant in the amount of \$2,498,734 to target services to the residents of Gilmore Homes that will result in long term, sustainable employment. Located in the Sandtown Winchester community of West Baltimore, Gilmore 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.

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

Appendix K
FY 2019 Annual Plan
The Office of Resident Services

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.

Appendix K
FY 2019 Annual Plan
The Office of Resident Services

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 2019 Annual Plan

In support of the MTW Annual Plan, HABC's Information Technology Department will undertake and/or complete the following initiatives in FY 2019:

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.

Status:

This project was put on hold until Emphasys (Elite) can re-write the application to work on Android and iPhones. Microsoft no longer support their Mobile devices. Housing Operations is taking the lead on this project.

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.

Status:

This project is in the final testing phase. There were major enhancements needed to make it fit our needs before we could use it effectively. Housing Operations is taking the lead on this project.

APPENDIX L
Information Technology
FY 2019 Annual Plan

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.

Status:

This project is on hold. The Executive Director has requested that we work with Emphasys (Elite) to modify their Web Based software to be more user friendly and functional for our residents to use. Housing Operations is taking the lead on this project.

**Appendix M:
Other HABC Housing**

APPENDIX M
Privately-Managed, RAD, Long-Term Affordable and Non-ACC Units

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			
Westhills Square	108	11		2	8	1			
Barclay Townhomes	72	53		39	5	5	2	2	
CHM	14	14			4	6	3		1
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	1107	710	0	223	249	188	46	2	2

APPENDIX M
Privately-Managed, RAD, Long-Term Affordable and Non-ACC Units

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
Allendale	164		164					
Bel-Park Tower	253	134	119					
Bernard E. Mason	223		223					
Brentwood	150	86	64					
Chase House	189	109	80					
Broadway	23		19	2	2			
Ellerslie	117	70	47					
Govans	191	102	89					
Hillside	4		1	3				
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					
Terrace Garden Co-op	4		4					
	2,703	946	1,544	151	52	10	0	0
Anticipated FY18 Conversions:								
Monument East	170	51	119					
Total FY18	170	51	119	0	0	0	0	0
Anticipated FY19 Conversions:								
Heritage Crossing	75		6	22	39	8		
Rosemont Tower	203		203					
Somerset Extension	60				32	20	4	4
J Van Story Branch	357	221	136					

APPENDIX M

Privately-Managed, RAD, Long-Term Affordable and Non-ACC Units

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
Homes for Arundel	58		1	7	44	6		
Hollander Ridge	100		20	30	40	10		
Total FY19	853	221	366	59	155	44	4	4
TBD								
Townes at the Terraces	203			78	110	15		
Arbor Oaks	62		26	36				
Total	265	0	26	114	110	15	0	0

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)	57		21	18	15	3		
Lillian Jones	8			2	6			
Moravia Park	9		9					
Mulberry at Park	8			2	6			
North Avenue Gateway	5			5				

APPENDIX M

Privately-Managed, RAD, Long-Term Affordable and Non-ACC Units

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
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	328		188	65	67	7	1	

Other HABC Owned Units (Non-ACC)	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
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 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:
Response to Comments**

APPENDIX O
HOUSING AUTHORITY OF BALTIMORE CITY
Response to Comments Received on the
FY 2019 Annual Plan, FY 2018 Annual Plan Second Amendment, the
FY 2019 HCVP Administrative Plan and the FY 2019 ACOP

COMMENT RECEIVED	HABC RESPONSE
<p>1. A Lack of Transparency Makes Local Accountability Impossible. As in past years, HABC's plan is not very informative and fails to describe key policy decisions, particularly regarding the amounts and uses of HCV and RHF funds transferred to other uses under fungibility and the results of HABC's portfolio analysis. Going forward, we ask that the Plans be more forthright and transparent and MTW Reports should be posted on HABC's website.</p>	<p>No change to the FY 2019 Annual Plan or FY 2018 Plan Amendment. HABC's Annual Plan is in compliance with Section VII. A.1.f. of the MTW Restated Agreement and Attachment B thereto.</p> <p>HABC's revised website will include sections for documents undergoing the Notice & Comment period, HUD-approved Annual Plans and HUD-reviewed Annual Reports.</p>
<p>2. Lack of an HABC or City Affordable Housing Strategy, including policies that seek to assure there will be no net loss of units. As in past years, the Plans seem disconnected from the public recognition of the growing housing crisis and rising homelessness in Baltimore. The Plans do not express a strategic plan for preserving or increasing affordable housing. Nor do the Plans align with the Con Plan, Analysis of Impediments, or Regional Housing Plan.</p>	<p>No change to the FY 2019 Annual Plan or FY 2018 Plan Amendment. HABC is currently drafting a Strategic Plan with community stakeholders to include residents, city housing officials, advocacy organizations, faith-based entities, community and neighborhood associations and others.</p>
<p>3. Lack of a strategy to increase access by families in HABC's regular HCV program to neighborhoods with lower levels of crime, better schools and healthier environmental conditions.</p>	<p>No change to the FY 2019 Annual Plan or FY 2018 Plan Amendment. All of the following topics are discussed thoroughly in the HCVP Voucher Briefing. Every participant is provided a HCVP Tenant Handbook, and a Voucher Briefing packet that provides the information summarized below. Both documents are discussed at length in the Voucher Briefing:</p> <p><u>Low Crime & Better Schools:</u> Mobility Counseling Opportunities through Portability The Homeownership Program</p>

APPENDIX O
HOUSING AUTHORITY OF BALTIMORE CITY
Response to Comments Received on the
FY 2019 Annual Plan, FY 2018 Annual Plan Second Amendment, the
FY 2019 HCVP Administrative Plan and the FY 2019 ACOP

COMMENT RECEIVED	HABC RESPONSE
	<p>Areas of Opportunity The Thompson Partial Consent Decree The Enhanced Leasing Assistance Program</p> <p><i>Healthier Environments</i> Housing Quality Standards Site and Neighborhoods Lead-Free/Lead-Safe Units</p>
<p>4. HABC should stop or curtail use of Replacement Housing Funds for other purposes. Despite wide scale demolition/disposition and pressing needs for affordable housing, HABC does not effectively use RHF/Transition funding to maintain the inventory of deeply affordable housing.</p>	<p>No change to the FY 2019 Annual Plan or FY 2018 Plan Amendment.</p>
<p>5. HABC should marshal its resources to affirmatively serve families with children. The MTW benchmark now locks in a scenario in which 50% of those served by HABC are single-person adults. Despite mountains of evidence that housing affordability and stability is particularly critical to the health and development of children, families with children do not seem to be central to HABC's mission. Only 31% of HABC households consist of three or more members.</p>	<p>No change to the FY 2019 Annual Plan or FY 2018 Plan Amendment.</p>
<p>6. HABC should post the final version of the MTW Annual Plan on its website that is approved by the Board of Commissioners and submitted to HUD. Currently, only the first public comment draft is available during the sometimes year long process of HUD review.</p>	<p>No change to the FY 2019 Annual Plan or FY 2018 Plan Amendment. HABC's revised website will include sections for documents undergoing the Notice & Comment period, HUD-approved Annual Plans and HUD-reviewed Annual Reports.</p>
<p>7. HABC should disclose critical information about HABC's intended use of MTW fungibility and flexibility in the MTW Plan.</p>	<p>No change to the FY 2019 Annual Plan or FY 2018 Plan Amendment. HABC's Annual Plan is in compliance with Section VII. A.1.f. of</p>

APPENDIX O
HOUSING AUTHORITY OF BALTIMORE CITY
Response to Comments Received on the
FY 2019 Annual Plan, FY 2018 Annual Plan Second Amendment, the
FY 2019 HCVP Administrative Plan and the FY 2019 ACOP

COMMENT RECEIVED	HABC RESPONSE
<p>Without this disclosure, HABC keeps the 25,000+ households on its waiting lists waiting longer for desperately needed housing, while using tens of millions in available funds each year for other purposes. Generally these other uses of HAP funds have little benefit or connection to the HCV program.</p>	<p>the MTW Restated Agreement and Attachment B thereto.</p>
<p>8. Lack of an HABC or City Affordable Housing Strategy, including preservation and/or one-for-one replacement of demolished housing: We are mindful of the uncertainty and budget pressures that HABC has faced over the past decade; however the people of Baltimore need and deserve a transparent and coherent Annual Plan with vision, strategic objectives aligned with the Con Plan and Regional Housing Plan, real milestones, and measurable outcomes. We hope that this will be the result of your new strategic planning initiative.</p> <p>a Lack of an HABC or City Affordable Housing Strategy: The Regional Housing Plan, to which Baltimore City and the other jurisdictions are parties, calls for the preservation of the region's inventory of deep subsidy housing. Replacement of lost units and additions to the inventory are to be focused on expanding affordable housing in higher opportunity areas. In contrast, the MTW Plan makes little or no attempt to minimize the accelerating loss of units or maximize their replacement.</p>	<p>No change to the FY 2019 Annual Plan or FY 2018 Plan Amendment. HABC's Annual Plan is in compliance with Section VII. A.1.f. of the MTW Restated Agreement and Attachment B thereto.</p> <p>a No change to the FY 2019 Annual Plan or FY 2018 Plan Amendment. Recognizing the considerable loss of capital funds public housing authorities ("PHAs") have sustained over the years and the inability to invest in aging housing stock owned and operated by PHAs, the Regional Housing Plan focuses on steps that the municipal jurisdictions, not PHAs, may take to preserve and create affordable housing. The Regional Housing Plan focuses on preserving "the limited affordable housing that currently exists in high opportunity areas." The units that HABC proposes to demolish are not in high opportunity areas. With respect to affordable units that cannot be saved, the Plan recommends that</p>

APPENDIX O
HOUSING AUTHORITY OF BALTIMORE CITY
Response to Comments Received on the
FY 2019 Annual Plan, FY 2018 Annual Plan Second Amendment, the
FY 2019 HCVP Administrative Plan and the FY 2019 ACOP

COMMENT RECEIVED	HABC RESPONSE
<p>b Lack of an HABC or City Affordable Housing Strategy In addition, the FY 2019 Plan proposes the removal/disposition of 67 units in Sandtown and Upton that are Thompson v. HUD replacement units for Murphy Homes, required by the Partial Consent Decree: the Midtown, Upton and Stricker Street scattered site packages. In other words, HABC is already proposing to demolish or dispose of replacement housing units. Like most of the Thompson replacement housing, these units were built with state PRHP funds and intended to be publicly owned and affordable in perpetuity. As a result, if no longer used for that purpose, HABC would have to pay the PRHP funds back to the state, a total of at least \$4,355,000. HCD Article 4-1208(b).</p>	<p>jurisdictions “identify replacements in high opportunity areas and/or provide vouchers and mobility counseling to affected families.” HABC is seeking tenant protection vouchers for the families living in the units that will be demolished and will use a relocation consultant who will counsel families on their moving options, including the benefits of moving to opportunity areas, and assist them with their moves.</p> <p>b No change to the FY 2019 Annual Plan or FY 2018 Plan Amendment. HABC is in regular communication with the State concerning these units and HABC’s obligations under the Regulatory Agreement.</p>
<p>9. Lack of a strategy for using MTW to increase mobility in the regular HABC voucher program, including through the use of Small Area FMRs or payment standards: HABC proposes a "local FMR" set at the 50th percentile and applied across the board (Activity 2019-02). HUD research has already shown that across the board 50th percentile FMRs are not effective and primarily result in payment of higher rents to landlords. HUD research has also shown that virtually no HABC</p>	<p>No change to the FY 2019 Annual Plan or FY 2018 Plan Amendment. As per our discussions in meetings and other communications with advocacy organizations, HABC will continue to maintain a local FMR set at the 50th percentile.</p> <p>The statement that 50th percentile rents have led to HABC paying above market rents in lower rent areas of the City is incorrect as</p>

APPENDIX O
HOUSING AUTHORITY OF BALTIMORE CITY
Response to Comments Received on the
FY 2019 Annual Plan, FY 2018 Annual Plan Second Amendment, the
FY 2019 HCVP Administrative Plan and the FY 2019 ACOP

COMMENT RECEIVED	HABC RESPONSE
regular voucher holders live in high opportunity areas now, despite the existing 50 th percentile FMRs. Indeed, the 50 th percentile rents have led to HABC paying above market rents in lower rent areas of the City, and this over-subsidization has resulted in voucher submarkets in certain areas.	92% of our units are at or below 90% of fair market value rents using the 50 percentile. A 40 percentile would still yield 80% of our units below 90% of the fair market rents.
10. We urge HABC to institute a pilot program adding a new HCV set-aside for families with young children.	No change to the FY 2019 Annual Plan or FY 2018 Plan Amendment.
<p>11. <i>Bailey</i> Supplemental Consent Decree Prohibits HABC's Transition from a Centralized Waiting List to Location Based Waiting Lists</p> <p>As we have previously commented, HABC's proposal to transition from a community-wide, centralized waiting list to a site-based waiting list with first-available option violates the <i>Bailey</i> Consent Decree and Supplemental Consent Decree. Paragraph 33 a. of the <i>Bailey</i> Supplemental Consent Decree provides: In the event that the "Mixed Population Public Housing Waiting List" no longer exists, the parties agree that HABC shall operate a comparable centralized waiting list that consists of elderly and NED applicants for developments that house elderly and NED families; and, in such event, HABC shall require that the RAD Owners draw all tenant applicants from such comparable centralized mixed population waiting list, as well as the "Reasonable Accommodation Transfer Waiting List."</p>	<p>No change to the FY 2019 Annual Plan or FY 2018 Plan Amendment.</p> <p>The comment that HABC is transitioning from a community-wide, centralized waiting list to a site-based waiting list with first-available option is incorrect. The transition is from a community-wide centralized waiting list to a centralized waiting list with first available options. Upon implementation of the Centrally Administered Location Based Waiting List (CALBWL) with a first available option, the mixed population sites that converted under the Rental Assistance Demonstration ("RAD") will be required to continue to occupy their units with elderly and non-elderly persons with disabilities ("NEDs") referred to them from the CALBWL in accordance with the <i>Bailey</i> Consent Decree.</p> <p>By HABC implementing a CALBWL with a first available option all applicants, including NEDs and persons who need the features of a UFAS unit, will have greater opportunities to make informed decisions in the selection of locations and awareness of the availability. Further, the high ratio of rejections to</p>

APPENDIX O
HOUSING AUTHORITY OF BALTIMORE CITY
Response to Comments Received on the
FY 2019 Annual Plan, FY 2018 Annual Plan Second Amendment, the
FY 2019 HCVP Administrative Plan and the FY 2019 ACOP

COMMENT RECEIVED	HABC RESPONSE
	<p>acceptances of offers that HABC currently experiences actually creates a slower process for leasing eligible applicants. HABC expects the CALBWL with the first available option to significantly reduce the high number of rejections of unit offers, thereby providing a more efficient, timely process for both HABC and applicants.</p>
<p>12. Location Based Waiting Lists Will Have a Disparate Impact on Individuals with Disabilities. Individuals with disabilities requiring UFAS accessible units or units located in specific locations due to disability related needs will experience delays and additional barriers to access these units. If an individual needing a UFAS unit has selected locations A, B, and C; however, a UFAS unit becomes available at location D with no individual on that waitlist needing a UFAS unit, HABC will be unable to match the tenant in need of the UFAS unit to the available UFAS unit. As a result, individuals needing accessible units will wait longer for access to HABC's housing stock.</p>	<p>No change to the FY 2019 Annual Plan or FY 2018 Plan Amendment. By HABC implementing the CALBWL with the first available option, all applicants, including NEDs and persons who need the features of a UFAS unit, will have greater opportunities to make informed decisions in the selection of locations and awareness of the availability.</p> <p>With respect to the unlikely example given by the commenter, HABC will make an offer to a family from the applicant waiting list or on the reasonable accommodation transfer waiting list an available UFAS unit even if the family did not select the site where the unit is located if there are no families who need the features of the UFAS unit who have selected that site.</p>
<p>13. HABC's Proposed MTW and ACOP Changes Fail to Conform to the Requirements of 24 CFR 903.7. Pursuant to 24 CFR § 903.7, for HABC to administer a site-based or location-based waiting list for its public housing units requires HABC to "provide for full disclosure to each applicant of any option available to the applicant in the selection of the development in which to reside, including basic information about available sites (location, occupancy, number and size of</p>	<p>No change to the FY 2019 Annual Plan or FY 2018 Plan Amendment. The commenter fails to understand that HABC is not implementing a site-based waiting list.</p>

APPENDIX O
HOUSING AUTHORITY OF BALTIMORE CITY
Response to Comments Received on the
FY 2019 Annual Plan, FY 2018 Annual Plan Second Amendment, the
FY 2019 HCVP Administrative Plan and the FY 2019 ACOP

COMMENT RECEIVED	HABC RESPONSE
<p>accessible units, amenities such as day care, security, transportation and training programs) and an estimate of the period of time the applicant would likely have to wait to be admitted to units of different sizes and types (e.g., regular or accessible) at each site." HABC's ACOP and Annual Plan fail to identify any information applicants to HABC's public housing waiting list will be provided prior to making any selection.</p> <p>Second, 24 CFR § 903.7(b)(2)(iii) prohibits HABC from adopting site-based waiting lists that "violate a court order or settlement agreement."</p> <p>Finally, 24 CFR § 903.7(b)(2)(iv), (v) requires HABC to create "reasonable measures to assure that adoption of site-based waiting lists is consistent with affirmatively furthering fair housing" and "review...its site-based waiting list policy to determine if the policy is consistent with civil rights laws and certifications."</p>	
<p>14. Comprehensive Affordable and Accessible Housing Strategies</p> <p>For HABC to be productive in its goals to provide affordable housing opportunities for low income families in Baltimore, HABC must develop aggressive strategies to increase these opportunities, as opposed to its current reactive demolition of units and replacement only when required by Consent Decrees. These policies should include the continued development of affordable units with HABC's ACC stock, as well as promise of 1:1 replacement for all ACC units lost.</p>	<p>No change to the FY 2019 Annual Plan or FY 2018 Plan Amendment.</p>
<p>15. Revisions to Minimum Rent and Hardship</p>	<p>No change to the FY 2019 Annual Plan or FY 2018 Plan</p>

APPENDIX O
HOUSING AUTHORITY OF BALTIMORE CITY
Response to Comments Received on the
FY 2019 Annual Plan, FY 2018 Annual Plan Second Amendment, the
FY 2019 HCVP Administrative Plan and the FY 2019 ACOP

COMMENT RECEIVED	HABC RESPONSE
<p>Exemptions HABC has still yet to publish, and respond to the public comments it received to its ACOP in early February 2018. We request HABC immediately publish the public comments it received on its ACOP and its responses to questions and concerns presented by interested parties.</p> <p>a First, HABC's proposed ACOP contains no Section 9.8. We believe HABC intends to direct readers to Section 9.6, which governs hardship exemptions. Within Section 9.6,</p> <p>b HABC indicates that residents will receive information on the ability to request a hardship exemption at the time of lease up. We request HABC require information on the hardship exemption to be provided at each recertification, and at any time a resident receives a 14-day notice of failure to pay rent. Providing additional reminders can reduce delayed applications for a hardship exemption, and decreased debts owed to HABC.</p> <p>c Second, we request that HABC publish the current list of privately owned sites that have an approved minimum rent that exceeds zero. Providing residents and applicants with information on the properties where the minimum rent exceeds HABC's standard policy is fundamental to understanding the benefits and risks of available housing opportunities. Withholding this information from the public produces no benefits for HABC, and places immense risk and misunderstanding on the applicants and residents HABC intends to serve.</p>	<p>Amendment. HABC emailed a copy of its response to public comments to everyone who submitted a comment and to its Board of Commissioners.</p> <p>a Revision made to the ACOP. The text in the ACOP directing readers to section 9.8 has been corrected to read 9.6.</p> <p>b No change to the FY 2019 Annual Plan or FY 2018 Plan Amendment.</p> <p>c No change to the FY 2019 Annual Plan or FY 2018 Plan Amendment. It is HABC's position that this information can be obtained from the Tenant Selection and Management documents at each site and</p>

APPENDIX O
HOUSING AUTHORITY OF BALTIMORE CITY
Response to Comments Received on the
FY 2019 Annual Plan, FY 2018 Annual Plan Second Amendment, the
FY 2019 HCVP Administrative Plan and the FY 2019 ACOP

COMMENT RECEIVED	HABC RESPONSE
	is not appropriate for inclusion in the ACOP.
<p>16. Section 2.3.10, 2.3.11--While we appreciate HABC increasing the allowable time participants may have guests in their homes to 14 consecutive days and 90 days per year, we request the wording be revised to "adults" as guests and not the expansive "person."</p> <p>We oppose changing the word 'adult' to 'person.' 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 includes children, in their units for more than 90 days but less than 180 because of custodial arrangements.</p>	<p>No change to the FY 2019 Annual Plan or FY 2018 Plan Amendment.</p> <p>HABC will honor all custody arrangements ordered and/or approved by a court of law.</p>
<p>17. Section 3.3- HABC's recommendation to reduce the time for applicants to update information from a request from HABC to 10 business days is ill-advised.</p> <p>Many low-income households and persons with disabilities do not have regular access to computers and the internet. Applicants should continue to have 90 days to respond to HABC's requests for updated information. Reducing response time so dramatically will be unacceptable and will have a disparate impact on families with disabilities, who often require assistance to navigate the internet, have difficulty arranging transportation to a location with a computer, and who may have difficulty timely accessing benefit letters to be submitted as documentation.</p>	<p>Revision made to the HCVP Administrative Plan.</p> <p>The 10-day deadline for applicants to update their information upon a request from HABC has been deleted. See the changes below. In addition, persons with a disability can always request a reasonable accommodation in order to extend the time required to update their information.</p> <p>“Applicants are required to respond within ninety (90) calendar days to all notifications from HABC to update information on their application and/or to determine if the applicant is still interested in receiving assistance.”</p>

APPENDIX O
HOUSING AUTHORITY OF BALTIMORE CITY
Response to Comments Received on the
FY 2019 Annual Plan, FY 2018 Annual Plan Second Amendment, the
FY 2019 HCVP Administrative Plan and the FY 2019 ACOP

COMMENT RECEIVED	HABC RESPONSE
<p>18. Section 6.8—We oppose allowing for all regular contributions and gifts to be imputed as income when those contributions amount to less than \$600 per year.</p> <p>Although HABC has made strides in simplifying its calculation of income and reporting procedures in its MTW Plan, HABC's proposed revision to require the imputation of gifts under \$600 or less than \$50 a month places a burden on participants and results in little benefit to HABC. HABC's prior policy of only attributing income to gifts over \$600 strikes the right balance between capturing regular and significant gifts that significantly contribute to a household's income and allowing households to obtain assistance from others.</p>	<p>Revision made to the HCVP Administrative Plan.</p> <p>See below: Any contribution or gift received two (2) months or more frequently will be considered a "regular" contribution or gift, unless the amount is less than \$600 per year</p>
<p>19. Section 7.5.8—Individuals over the age of 62 and applicants and participants needing an extension to obtain and report a social security number should continue to be afforded 120 days to provide this information.</p> <p>In order to obtain a social security number, individuals need to submit multiple pieces of proof of identity, some of which may not be immediately available to participants, such as birth certificates, marriage licenses, and State IDs. The collection of these documents can take several months.</p>	<p>No change to the FY 2019 Annual Plan or FY 2018 Plan Amendment.</p> <p>Individuals over the age of 62 and applicants and participants needing an extension to obtain and report a social security number will be afforded a 90-day extension to obtain and report a social security number.</p>
<p>20. Section 12.3.1 HABC cannot limit interim recertifications, reporting a decrease in income, to once per year.</p> <p>Section 12.3.1 states: "Participants may report a decrease in income and other changes, such as an increase in allowances or deductions that would reduce the amount of household rent at any time, but <u>are limited to one request per year.</u>"</p>	<p>Revision made to the HCVP Administrative Plan.</p> <p>HABC has deleted this initiative from the Administrative Plan.</p>

APPENDIX O
HOUSING AUTHORITY OF BALTIMORE CITY
Response to Comments Received on the
FY 2019 Annual Plan, FY 2018 Annual Plan Second Amendment, the
FY 2019 HCVP Administrative Plan and the FY 2019 ACOP

COMMENT RECEIVED	HABC RESPONSE
<p>21. Section 12.3.5 is inconsistent with Section 12.2 in that Section 12.2 states that zero income households are required to recertify every 12 months, while 12.3.5 requires zero income households to rectify every 120 days. HABC must ensure its policy positions are consistent throughout the administrative plan.</p>	<p>Revision made to the HCVP Administrative Plan. Section 12.2 is now consistent with section 12.3.5 and zero income households are required to recertify every 12 months.</p>
<p>22. Section 12.6--HABC should maintain mandatory language of "will" and not revise to "may." Keeping mandatory language within its policies provides consistent application of its policies, and ensures applicants and participants understand what action HABC will take when welfare assistance is reduced.</p>	<p>No change to the FY 2019 Annual Plan or FY 2018 Plan Amendment.</p>
<p>23. Sections 15.2.3 and 15.5—While HABC is permitted to terminate and deny admission when a resident or applicant is abusing alcohol in a way that threatens the health, safety, or the right to peaceful enjoyment of the premises by other residents; we request HABC should include information that HABC will provide for reasonable accommodations for individuals seeking treatment.</p>	<p>No change to the FY 2019 Annual Plan or FY 2018 Plan Amendment. HABC’s Fair Housing and Reasonable Accommodation policies are available and shared with residents and applicants through several mediums. The Policies are detailed in Chapter 1 of the Administrative Plan (and the ACOP); can be found on the HABC website, and notices are posted in all HABC administrative and management offices. In addition the RA Policy is reviewed at the time of leasing, and resident reasonable accommodation needs are monitored through an annual questionnaire. While applying for housing assistance the HABC application includes opportunities for applicants to ask for a reasonable accommodation and gives the contact information for fair housing agencies in the event an applicant feels they have experienced discriminatory behavior from HABC.</p>
<p>24. Section 15.3.1—HABC states "HABC will check criminal</p>	<p>No change to the FY 2019 Annual Plan or FY 2018 Plan</p>

APPENDIX O
HOUSING AUTHORITY OF BALTIMORE CITY
Response to Comments Received on the
FY 2019 Annual Plan, FY 2018 Annual Plan Second Amendment, the
FY 2019 HCVP Administrative Plan and the FY 2019 ACOP

COMMENT RECEIVED	HABC RESPONSE
<p>history for all members of the applicant's <i>or participant's</i> household who are age fourteen (14) years and older to determine whether any such member has engaged in drug-related, violent, or other serious criminal activity.</p> <p>As written, HABC's policy does not clearly comply with the limited and reasonable lookback provisions of 24 CFR 982.553. HABC's "purpose" section appears to allow an unrestricted lookback period. Instead it should clearly state the limited review of adult applicant's criminal history to 18 months for misdemeanors and 3 years for felonies.</p>	<p>Amendment. HABC disagrees with the commenter's assessment. The "lookback" period is clearly stated in Section 15.3.3.</p>
<p>25. Section 18.4--HABC should not limit repayment agreement to \$2,500.</p> <p>So long as a participant is able to make payments in addition to her tenant portion, not exceeding 40% of their income, HABC should not arbitrarily limit the debt amount to \$2,500. If a reasonable repayment plan is possible, HABC should continue to allow participants to make payments with continued assistance.</p>	<p>Revision made to the HCVP Administrative Plan and to the ACOP. HABC has extended the maximum time a resident is required to enter into a repayment agreement from 10 months to 12 months for debts totaling \$501-\$1000 and from 18 to 24 months for debts totaling \$1001 - \$2500.</p>
<p>26. HABC-funded Permanent Supportive Housing should adhere to key principles including Housing First</p> <p>HABC should require that all privately owned Permanent Supportive Housing (PSH) funded by HABC, including project-based vouchers and moderate rehab SROs, certify they will comply with the key principles of Housing First. Such certification should be subject to monitoring and enforcement by HABC.</p>	<p>No change to the FY 2019 Annual Plan or FY 2018 Plan Amendment. HABC is working with the City of Baltimore and its Office of Homeless Services on supportive services for the homeless. Through this process a case worker will provide continuum of care services</p>
<p>27. HABC's current screening practices for PSH are inconsistent with Housing First and Baltimore City's Coordinated Access system.</p> <p>HABC's practices of screening PSH applicants referred from</p>	<p>No change to the FY 2019 Annual Plan or FY 2018 Plan Amendment.</p>

APPENDIX O
HOUSING AUTHORITY OF BALTIMORE CITY
Response to Comments Received on the
FY 2019 Annual Plan, FY 2018 Annual Plan Second Amendment, the
FY 2019 HCVP Administrative Plan and the FY 2019 ACOP

COMMENT RECEIVED	HABC RESPONSE
<p>Coordinated Access for criminal records, prior evictions from assisted housing, and prior debts owed are contrary to HUD requirements to lower barriers to housing for the City's most vulnerable individuals and families.</p>	
<p>28. HABC's proposed PSH project of 100 Public Housing units is inconsistent with Housing First and violates Fair Housing laws. As noted above, voluntary services are a key element of implementing Housing First in PSH and no PSH tenant should ever be terminated for failing to participate in services. Further, any requirement that a Public Housing tenant engage in disability-related services or treatment as a condition of tenancy would clearly run afoul of the Federal Fair Housing Act and other civil rights laws.</p>	<p>Revision made to the FY 2018 ACOP. HABC has revised section 5.4.1 of the ACOP. HABC will not terminate a family's lease due to the family's failure to comply with and complete the family service program. The narrative in the ACOP has been revised as follows:</p> <p>Pursuant to an agreement between HABC and the program funder, HABC will provide an allocation of up to 100 public housing units for families referred by the Mayor's OHS through their Coordinated Access database. Applicants for units allocated under the Homeless allocation must meet HABC eligibility and screening requirements. Eligible applicants will be assigned appropriately sized units at family developments. Each family referred under this program will have a primary service provider who will coordinate and monitor all program activities. Families will be required to comply with and complete their service programs, which may include services such as addiction, anti-aggression, family and mental health counseling. HABC has the right to terminate a family's lease due to the family's failure to comply with and complete the family's service program. The family must also comply with the terms of the family's HABC lease.</p>
<p>29. HABC should not exclude homeless persons from the emergency preference for families displaced by public/governmental action in Baltimore City</p>	<p>No change to the FY 2019 Annual Plan or FY 2018 Plan Amendment. HABC's definition of displaced families is consistent with</p>

APPENDIX O
HOUSING AUTHORITY OF BALTIMORE CITY
Response to Comments Received on the
FY 2019 Annual Plan, FY 2018 Annual Plan Second Amendment, the
FY 2019 HCVP Administrative Plan and the FY 2019 ACOP

COMMENT RECEIVED	HABC RESPONSE
	applicable laws.
<p>30. HABC should maintain its policy of re-determining rent reasonableness before any increase in rent to the owner. HABC proposes to make optional — rather than mandatory — its practice of re-determining rent reasonableness prior to approving any increase in rent to the owner.⁸ It is unclear, however, how HABC would evaluate an owner's request for a rent increase without determining the reasonableness of the new rent amount requested.</p>	<p>No change to the FY 2019 Annual Plan or FY 2018 Plan Amendment. HABC will continue to conduct a rent reasonableness test prior to approving any increase in rent to the owner. Section 11.2 clearly states: “The rent to owner is limited by the rent reasonableness determination. HABC must demonstrate that the rent to owner is reasonable in comparison to rent for other comparable unassisted units.”</p>
<p>31. HABC should reduce a participant's rent if welfare assistance is reduced under specified circumstances HABC proposes to make optional — rather than mandatory — its practice of reducing a participant's rent if the participant's welfare assistance benefits have been reduced in three circumstances: the expiration of a lifetime time limit on receiving benefits, a situation where the household complied with welfare program requirements but cannot or has not obtained employment, or a situation where a household member has not complied with other welfare agency requirements.' This language conflicts with another section of the Administrative Plan; Section 6.16 (not 6.18) in the Draft Plan states that HABC "will" reduce the rent in the specified circumstances. Further, the proposed change would allow HABC to impute welfare benefits as income to participant families who are no longer receiving the income, through no fault of their own.</p>	<p>No change to the FY 2019 Annual Plan or FY 2018 Plan Amendment. HABC has revised section 12.4 to comply with section 6.16 and corrected the typo in section 12.4.</p> <p>“HABC <i>may</i> reduce the rental contribution if the welfare assistance reduction is a result of the expiration of a lifetime time limit on receiving benefits, a situation where the household complied with welfare program requirements but cannot or has not obtained employment, or a situation where a household member has not complied with other welfare agency requirements.”</p>
<p>32. HABC may not re-determine eligibility for a family porting into Baltimore City. HABC has included in its Draft Plan a new requirement that HCVP participants porting into Baltimore City must be in "good standing</p>	<p>Revisions made to the HCVP Administrative Plan. HABC does not make a determination as to whether a family porting into Baltimore City is in "good standing"; however HABC will confirm and verify the determination made by the initial PHA.</p>

APPENDIX O
HOUSING AUTHORITY OF BALTIMORE CITY
Response to Comments Received on the
FY 2019 Annual Plan, FY 2018 Annual Plan Second Amendment, the
FY 2019 HCVP Administrative Plan and the FY 2019 ACOP

COMMENT RECEIVED	HABC RESPONSE
<p>with the voucher issued by the initial jurisdiction."¹¹ HUD regulations, however, clearly state that it is the initial PHA that determines the family's eligibility to move. The receiving PHA may not re-determine eligibility for a participant family porting into their jurisdiction. Therefore, HABC lacks authority to make a determination as to whether a family porting into Baltimore City is in "good standing" with the initial PHA and lacks authority to deny, terminate, or otherwise refuse to issue a voucher based upon such a determination. HABC should remove this provision from the Draft Plan.</p>	<p>Pursuant to this comment HABC modified the language in Section 13.5.2 to clarify its policy. See below.</p> <p>Port-in households will be required to meet all HABC program criteria prior to being accepted (see Chapter 2, ELIGIBILITY FOR ADMISSION and Chapter 3, APPLYING FOR ADMISSION). As the receiving jurisdiction, HABC will require the documents listed on the HUD Portability Billing Form from the initial jurisdiction. <u>While the initial PHA will determine the participants eligibility to move, must also be in good standing with the voucher issued by the initial jurisdiction. HABC will confirm the eligibility determination made by the initial PHA. If HABC denies assistance to the family, HABC will notify the initial PHA and the family will be offered an informal review or hearing.</u> After receiving and confirming<u>approving</u> the portability paperwork from the initial PHA, HABC will contact the participant within ten (10) business days to schedule a mandatory voucher briefing</p>
<p>33. HABC should adopt a waiting list preference for applicants experiencing homelessness on the Public Housing and HCVP waiting lists, as well as for Transitional Housing residents on the Project-Based Voucher and Public Housing waiting lists. 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. HPRP encourages HABC to adopt a local preference for applicants on the Public Housing and Housing Choice Voucher Program (HCVP) waiting lists who are experiencing homelessness.</p>	<p>No change to the FY 2019 Annual Plan or FY 2018 Plan Amendment. HABC will set aside up to 100 units for homeless families referred by the Mayor's Office of Homeless Services to be admitted into public housing (see the FY 2019 Annual Plan). In addition, the Housing Choice Voucher Program has set aside up to 850 tenant-based vouchers and been awarded 192 project-based vouchers for the homeless.</p>
<p>34. Project-based transitional housing does not increase</p>	<p>No change to the FY 2019 Annual Plan or FY 2018 Plan</p>

APPENDIX O
HOUSING AUTHORITY OF BALTIMORE CITY
Response to Comments Received on the
FY 2019 Annual Plan, FY 2018 Annual Plan Second Amendment, the
FY 2019 HCVP Administrative Plan and the FY 2019 ACOP

COMMENT RECEIVED	HABC RESPONSE
<p>housing choice. 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>	<p>Amendment. HABC invites the commenter to introduce this topic at one of the advocacy organization committee meetings held with HABC. Notwithstanding the foregoing, HABC maintains that Project-based transitional housing for special populations is an important housing resource and HABC will continue to assist Baltimore City residents to obtain this type of housing particularly when the alternative is homelessness.</p> <p>Participants are encouraged to contact HABC if there is a problem and when participants are terminated for program non-compliance HABC will schedule an informal meeting with the site, the participant and HABC. Upon conclusion of the meeting HABC will decide to either uphold the site’s decision or provide the participant assistance with permanent housing.</p>

APPENDIX O
HOUSING AUTHORITY OF BALTIMORE CITY
Response to Comments Received on the
FY 2019 Annual Plan, FY 2018 Annual Plan Second Amendment, the
FY 2019 HCVP Administrative Plan and the FY 2019 ACOP

No.	Section Name and Subject Area	Source	Existing ACOP	Proposed ACOP
Chapter 3: Application & Waiting List				
1.	3.6 Types of Waiting Lists	HABC	<p>HABC has established the following waiting lists:</p> <ul style="list-style-type: none"> • Location Based Waiting List: • 1st Available Waiting List <p>Referral Program (Special Programs): Applicants are referred directly to HABC under Special Programs or Allocations</p>	<p>HABC has established the following waiting lists:</p> <ul style="list-style-type: none"> • Location Based Waiting List: On their pre-application, applicants will choose up to three (3) developments where they would like to live from within HABC’s general family, scattered site and senior-preference RAD properties. Based on their selections, HABC will place the applicant on the waiting list(s) for their chosen development(s). An applicant also has the option to choose the first-available waiting list if they have no preference for location. Applicants who choose this option will be placed on the waiting lists for all developments where they are eligible. <p>The CALBWL will not include developments covered by the Bailey Supplement Consent Decree. A single waiting list will serve all developments covered by the Decree. Applicants interested in one of the developments covered by the Decree must choose the single waiting list, referred to as the Mixed Population Waiting List.</p>

APPENDIX O
HOUSING AUTHORITY OF BALTIMORE CITY
Response to Comments Received on the
FY 2019 Annual Plan, FY 2018 Annual Plan Second Amendment, the
FY 2019 HCVP Administrative Plan and the FY 2019 ACOP

No.	Section Name and Subject Area	Source	Existing ACOP	Proposed ACOP
				<p>Location Based Waiting List: Applicants selecting the location-based waiting list option may have a longer wait for housing, but will only be offered housing units at those housing developments where they prefer to live.</p> <ul style="list-style-type: none"> • 1st Available Waiting List: Applicants who select the “first available” option will be offered the first housing unit at any HABC location based on the date, time and preference category of their application. Applicants selecting the “first available” option are likely to be housed more quickly, but will not generally have a choice in location. • Referral Program (Special Programs): Applicants are referred directly to HABC under Special Programs or Allocations <p>An applicant may choose three sites in total from the applicable LBWLs or the 1st available apartment option.</p> <p>All waiting lists will be maintained and operated in a manner that is consistent with applicable civil</p>

APPENDIX O
HOUSING AUTHORITY OF BALTIMORE CITY
Response to Comments Received on the
FY 2019 Annual Plan, FY 2018 Annual Plan Second Amendment, the
FY 2019 HCVP Administrative Plan and the FY 2019 ACOP

No.	Section Name and Subject Area	Source	Existing ACOP	Proposed ACOP
				rights and fair housing laws and regulations. The procedures for administration of the LBWLs are set forth in the LBWL Operating Order.

Appendix P:
RAD Phase II Tables

APPENDIX P
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 P
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

APPENDIX P
Rental Assistance Demonstration Information

6-Bedroom	4	0	Reduction of 4 units pursuant to the HUD De Minimis rule
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	-	-	-

APPENDIX P
Rental Assistance Demonstration Information

If Performing a Transfer of Assistance:	None
--	------

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

APPENDIX P
Rental Assistance Demonstration Information

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
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		