

RENAISSANCE



MOVING TO WORK



FY
2023
Annual
Plan

US Department of Housing
& Urban Development
Office of Indian
& Public Housing



HOUSING
AUTHORITY of
BALTIMORE CITY



Moving to Work Annual Plan

Fiscal Year 2023

Approved by the HABC Board of Commissioners:

October 18, 2022

**Submitted to the U.S. Department of Housing & Urban
Development:**

First Submission: October 24, 2022

Second Submission: January 17, 2023

Approved by HUD: January 19, 2023

First Amendment Proposed: April 10, 2023

Approved by HUD: July 11, 2023

Housing Authority of Baltimore City

Moving to Work Annual Plan – Fiscal Year 2023

Table of Contents

I.	Introduction and Overview	1
	A. Background on the MTW Demonstration	1
	B. MTW Long-Term Goals and Objectives.....	2
	C. MTW Goals and Objectives for Fiscal Year 2023	3
II.	General Housing Authority Operating Information.....	7
	A. Housing Stock Information.....	7
	B. Leasing Information	33
	C. Waiting List Information	34
III.	Proposed MTW Activities.....	36
IV.	Approved MTW Activities	37
	A. Implemented Activities	37
	Activity #2006-01: Streamlined Recertification Process.....	37
	Activity #2006-02 Enhanced Project Based Voucher Program.....	40
	Activity #2006-03: Thompson Biennial Recertifications	44
	Activity #2006-04: Family Self-Sufficiency Program Enhancements	46
	Activity #2007-01: Mobility Program Enhancements/Thompson	49
	Activity #2009-01: MTW Homeownership Program.....	51
	Activity #2010-01: Unit Sizes	56
	Activity #2010-02: Bailey Long–Term Affordable Project-Based Voucher Contract	57
	Activity #2010-03: Thompson Risk Based Inspections.....	59
	Activity #2012-01: Rent Simplification – Thompson.....	61
	Activity #2014-01: HABC Long–Term Affordable Project-Based Voucher Contract	64
	Activity #2019-01: Rent Simplification.....	66
	Activity #2019-02: Local Fair Market Rent	69
	Activity #2020-01: Housing Quality Standards (HQS) Modifications & Enhancements.....	71
	Activity #2020-02: The Healthy Opportunities Program.....	74
	Activity #2020-03: Local Forms	76
	Activity #2020-04: Modified Rent Reasonableness & Rent Cap Policy.....	77

Activity #2020-05: The Bailey 10 Total Development Cost Limit Policy	79
Activity #2021-01: Emergency Waivers	81
Activity #2021-03: Growing Assets & Income Program: Thompson Settlement Agreement	85
Activity #2022-01: Student Housing Initiative.....	88
Activity #2022-02: Leasing Incentive Program	92
B. Not Yet Implemented Activities.....	96
C. MTW Activities on Hold.....	96
D. Closed-Out MTW Activities	97
V. Planned Application of MTW Funds	103
A. Estimated Sources and Uses of MTW Funds in FY 2023	103
B. Planned Application of PHA Unspent Operating Fund and HCV Funding	107
C. Local Asset Management Plan (LAMP)	107
D. Rental Assistance Demonstration (RAD) Participation	108
VI. Administrative	114
A. Board Resolution and Certification of Compliance.....	114
B. Documentation of Public Process	114
C. Planned & Ongoing Evaluations	114
D. Lobbying Disclosures.....	114
Appendix A: Estimated Sources and Uses: Non-MTW Funds	115
Appendix B: Local Asset Management Plan.....	118
Appendix C: Board Resolution.....	122
Appendix D: Certification of Compliance.....	124
Appendix E: Certification of Consistency with Consolidated Plan	126
Appendix F: Public Process Documentation	127
Appendix G: Public Hearing: Comments Received on the FY 2023 Annual Plan	128
Appendix H: Written Comments on the FY 2023 Annual Plan.....	138
Appendix I: Lobbying Activities (SF-LLL) Form.....	146
Appendix J: Certification of Payment (HUD-50071) Form	147
Appendix K: RAD Significant Amendment	148

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 MTW Demonstration Program in Fiscal Year (FY) 2023, i.e. the period from January 1, 2023 through December 31, 2023.

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 December 31, 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 calendar year 2023. 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 MTW Demonstration

MTW is a demonstration program authorized by Congress, which provides HABC and 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 2023 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.

B. MTW Long-Term Goals and Objectives

HABC relies on MTW flexibilities to carry out a variety of initiatives and advance our mission. We continue to focus on designing new and innovative ways to address local issues and streamlining existing MTW activities, in addition to the ongoing implementation of our Strategic Plan, Pathways to Success. HABC's long term objectives include expanding the reach of our voucher program, redeveloping and making capital improvements to our public housing sites, providing supportive services for residents and enhancing the internal operations of our organization.

HABC will continue our efforts to increase voucher utilization and recruit/retain participating landlords through:

- Increasing our landlord outreach, which includes monthly informational sessions, and targeting landlords in submarkets where higher payment standards can be applied to expand housing choice for tenants.
- Providing leasing incentives, including vacancy and damage loss payments, security deposit assistance and incentives for new landlords and/or new units and rentals located within opportunity areas; and
- Creating special initiatives such as mobility and student housing programs.

HABC's plans for addressing the capital needs of our public housing sites include the following:

- Conducting an analysis of our conventional public housing developments to include a Physical Needs Assessment and use the results to prioritize and budget for modernization and other improvements;
- Continuing our redevelopment efforts at Perkins, Poe and O'Donnell and target future sites for neighborhood revitalization: and
- Pursuing RAD conversions to preserve housing affordability through private investment.

We are committed to providing our residents with opportunities for growth, learning and self-sufficiency and will build upon our programs by:

- Advocating for dedicated supportive services funding;
- Developing strategies to maximize resident participation in education, career, homeownership and other initiatives that promote economic mobility; and

- Forging new partnerships to connect residents to needed resources such as healthcare and other services as well as access to internet and devices.

HABC will also focus on our internal operations to ensure long term stability and success of the agency. Current and future efforts to do this include:

- Evaluating staffing needs and increasing our recruitment efforts, as well as investing in staff training to encourage advancement and offering attractive benefits such as student loan repayment assistance and paid family leave;
- Planning for staff transition and succession;
- Working with a consultant to conduct an agency-wide diversity, equity and inclusion assessment and implementing the recommendations that come from it, which will shape both our internal and external policies and practices.

C. MTW Goals and Objectives for Fiscal Year 2023

In support of HABC’s Strategic Plan as well as HABC’s aim to Respond, Return, Reassure and Reinvent, the summary below provides highlights of HABC’s MTW and Non-MTW activities and goals and objectives for FY 2023.

Public Housing

- **Occupancy:** HABC projects that 5,939 households will be served in FY 2023
- **Capital Program:** HABC will implement capital improvements at existing public housing developments and scattered sites using MTW Block Grant funds (see Table 5). In FY 2023, HABC projects that it will expend approximately \$20 million on capital projects.

Housing Choice Voucher Program

- **Voucher Utilization:** HABC projects that, on average, it will have 18,266 MTW units under lease each month, including Thompson vouchers.
- **Project-Based Voucher Utilization:** HABC projects that 3,328 housing units will be under contract in the Project-Based Voucher (PBV) program by the end of FY 2023, including 348 planned units to be placed under contract during the fiscal year.
- **Homelessness Prevention Initiatives:** The Housing First Homeless Initiative does not require MTW Authority as HABC provides up to 900 Housing Choice Vouchers to eligible chronically homeless households referred by the Mayor’s Office of Homeless Services (MOHS). Participants use their vouchers to find affordable permanent housing while receiving supportive services MOHS and partner agencies. Of the 900 set aside vouchers,

195 have been set aside for project-based voucher units for homeless individuals, 50 are for homeless families with children under age 18 and 655 tenant-based vouchers are for homeless individuals and families. In FY 2023 HABC anticipates that all vouchers set-aside for homeless individuals and families will be utilized.

- **The Project-Based Homeless and Veterans Set Asides:** Using its MTW authority, HABC awarded PBV units designated to house the homeless and homeless veterans. By the end of FY 2023, HABC anticipates that 195 units for the homeless and 19 units for homeless veterans will be under contract and in 2022 there were 56 additional units under construction planned for homeless veteran designations.
- **The Re-Entry Program:** This program links permanent housing with supportive services to assist up to 250 ex-offender households. Referrals are made to HABC by MOHS. MTW Authority is not required for this initiative. In FY 2023, HABC anticipates that 240 vouchers will be issued and leased under this initiative. Vouchers are generally issued upon receipt of applicable referrals.

Office of Resident Services

- **MTW Homeownership Programs:** The MTW Homeownership Program works with public housing residents, HCV participants and other eligible low-income households in preparation for first-time homeownership. As part of the MTW Homeownership Program, HABC utilizes MTW flexibility to create and fund a limited number of Special Homeownership Vouchers (SHV) for use by eligible low-income households who purchase a scattered site unit.
- **Resident Service Programs:** HABC will continue offering its full menu of adult education programs such as on-site ABE and GED classes. Additionally, HABC is now working with a new vendor offering its Bedtime in a Box program to encourage a love for reading.

Rental Assistance Demonstration Program (RAD)

Under RAD, public housing developments can be converted to Project Based Rental Assistance (PBRA) or to Project Based Voucher (PBV) assistance. Developments converted under RAD to either PBRA or PBV have a new ownership structure including a new management and maintenance team. HABC anticipates that it will have closed on 32 RAD developments, consisting of 4,458 units by the end of FY 2023. See Tables 15 and 16 for specific information on RAD conversions.

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 are subject to change.

- **O'Donnell Heights:** The new Neighborhood Revitalization Plan for the O'Donnell Heights community was approved by the Baltimore City Planning Commission, and HABC has been working with the development team to submit a 4% Low Income Housing Tax Credit (LIHTC) application in 2022. Construction on Key's Pointe Phase 2A is expected to begin in 2023, contingent upon HUD's approval of its disposition application. Also in 2023, HABC will issue a relocation survey to existing residents at O'Donnell Heights and begin discussions for planning the redevelopment of the remaining 230 units. In addition, the state awarded a \$500,000 planning grant for a 5-acre park, which will be a collaborative effort between HABC, Baltimore City's Department of Recreation and Parks, the community and other stakeholders.
- **Perkins Somerset Oldtown (PSO) Transformation Plan:** Somerset Phase 1 is completed and has reached stabilized occupancy. Construction for Somerset Phases 2 and 3 and Perkins Phase 1 is expected to be completed in 2023. Perkins Phase 2 was awarded 9% LIHTCs and is projected to close in 2022 and be under construction in 2023. Somerset Phase 4 (awarded 9% LIHTCs) and Perkins Phase 3 are projected to close and be under construction in 2023. A 9% LIHTC application was submitted for Perkins Phase 4 in 2022 and closing is anticipated for 2023. The third and final demolition phase of Perkins Homes is expected to be completed in 2023.
- **Poe Homes:** HABC has been working in collaboration with Baltimore City on the condemnation/acquisition process for 811 W. Saratoga St. and 317-323 N. Schroeder St., both of which HABC may acquire in 2023. In addition, we are working with the City on a Land Swap agreement that includes 325-329 N. Schroeder St. All of these potential strategic acquisitions will assist HABC in completing site assembly as it related to Poe Homes Phase 1 and will strengthen a potential Choice Neighborhoods implementation application for the Transform Poe Plan. The tenant relocation process for Poe Homes residents may commence in 2023 subject to HUD's approval of the demolition application.
- **Bailey Supplemental Decree Units:** HABC has acquired three one-bedroom units pursuant to the Bailey Supplemental Decree. Seven additional one-bedroom units for non-elderly persons with a disability will be created through the acquisition and

rehabilitation of existing units in various neighborhoods. HABC may acquire two of these seven additional units in 2023.

Thompson Settlement Agreement

Pursuant to the Thompson Settlement Agreement, the Baltimore Regional Housing Partnership (BRHP) is continuing the project-based development program that was started under the Thompson partial consent decree. BRHP is implementing a project-based development program to create project-based units in communities of opportunity. Subject to funding availability, BRHP is making pre-development funding and, if needed, subordinate secondary financing using the Urban Revitalization Demonstration Grant funds awarded for the Homeownership Demonstration Program (MD-06-URD-002-I294), available to pre-qualified developers and property owners who develop housing units and agree to enter into long term project-based voucher contracts.

BRHP committed funding for 54 units in FY 2019. Additionally, in FY 2023, BRHP's goal is to have 12 new units created in Hanover, MD, as part of the Eagle Park development, a project in a Communities of Opportunity. The Red Maple Place project has been stalled by legal challenges; however, if the project is able to proceed. Ten project-based units will be created from the 56 units of new construction, built in Towson, Maryland.

Bailey Consent Decree

The Bailey Consent decree required the creation of:

- 756 housing units that meet the Uniform Federal Accessibilities Standards (UFAS); and
- 600 PBV units for non-elderly persons with disabilities (100 of the 600 are long term affordable (LTA) units, which means that residents living in them have the rights, privileges and benefits that are provided to HABC's public housing residents).

Using MTW flexibility, HABC will create additional LTA NED units and LTA UFAS units to complete its obligations under Bailey.

II. General Housing Authority Operating Information

A. Housing Stock 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 RAD.

i. Planned New Public Housing Units

Table 1: Planned New Public Housing Units in FY 2023

There are no new public housing units planned for FY 2023.

AMP Name and Number	Bedroom Size						Total Units	Population Type**	# of UFAS Units	
	0/1	2	3	4	5	6+			Section 504 Accessible Units* (Mobility)	Section 504 Units* (Hearing/Vision)

Total Public Housing Units to be Added in the Plan Year 0

* The federal accessibility standard under HUD’s Section 504 regulation is the Uniform Federal Accessibility Standards (UFAS) for purposes of Section 504 compliance (24 CFR 8.32). HUD recipients may alternatively use the 2010 ADA Standards for Accessible Design under Title II of the ADA, except for certain specific identified provisions, as detailed in HUD’s Notice on “Instructions for use of alternative accessibility standard,” published in the Federal Register on May 23, 2014 (“Deeming Notice”) for purposes of Section 504 compliance, <https://www.govinfo.gov/content/pkg/FR-2014-05-23/pdf/2014-11844.pdf>

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

If “Population Type is “Other” please describe:

ii. Planned Public Housing Units to Be Removed

As shown on Table 2, HABC plans to demolish and/or dispose up to 1,178 units in FY 2023. While Table 2 provides an estimate of the number of units to be removed from the public housing inventory during the Plan Year, the actual number may vary depending on the timetables for HUD and City of Baltimore approvals, project financing, RAD closings and other factors. Due to various

factors that impact the timetable, the listed items may have been included in previous and may be included in future plans.

Table 2: Planned Public Housing to Be Removed in FY 2023

PIC Dev.#/AMP and PIC Dev. Name	Number of Units to be Removed	Explanation for Removal
MD002/000003 Perkins Homes	Up to 415	Perkins Homes will be demolished and redeveloped as part of the PSO Transformation Plan and HUD Choice Neighborhoods award. The last phase of demolition will begin in September/October 2022 and is projected to be complete in 2023.
MD002/000004 Poe Homes	288	HABC may submit a demolition application for Poe Homes as part of the Poe Homes Transformation Plan. If approved, tenant relocation may take place in 2023.
MD002/000203D Scattered Sites 203D Oswego Mall	35	Planned RAD conversion, which will not take place in 2023. HABC may submit demolition application to HUD pursuant to a redevelopment plan for Oswego Mall.
MD002/000202A Scattered Sites 202A Carey House	23	Planned RAD conversion, which may take place in 2023.
MD002/000202B Scattered Sites 202B Laurens House	36	Planned RAD conversion, which may take place in 2023.
MD002/000106 Townes at the Terraces	203	Planned RAD conversion, which may take place in 2023.
MD002/000103 Midtown Apartments 922 N. Calhoun St. A	1	Unit is not viable due to neighborhood conditions and would not provide safe housing for an HABC tenant. To be auctioned.
MD002/000103 Midtown Apartments 922 N. Calhoun St. B	1	Unit is not viable due to neighborhood conditions and would not provide safe housing for an HABC tenant. To be auctioned.
MD002/000103 Midtown Apartments 1213 Mosher St. A	1	Unit is not viable due to neighborhood conditions and would not provide safe housing for an HABC tenant. To be auctioned.
MD002/000103 Midtown Apartments 1213 Mosher St. B	1	Unit is not viable due to neighborhood conditions and would not provide safe housing for an HABC tenant. To be auctioned.
MD002/000103 Midtown Apartments 1319 Mosher St.	1	Unit has been deemed not viable due to an abundance of vacant properties on this block. To be auctioned.

PIC Dev.#/AMP and PIC Dev. Name	Number of Units to be Removed	Explanation for Removal
MD002/000103 Midtown Apartments 1605 Riggs Ave.	1	Unit has been deemed non-viable and will be disposed of in accordance with HABC's scattered sites strategy. To be auctioned.
MD002/000103 Midtown Apartments 1623 Mosher St. A	1	Unit has been deemed non-viable and will be disposed of in accordance with HABC's scattered sites strategy. To be auctioned.
MD002/000103 Midtown Apartments 1623 Mosher St. B	1	Unit has been deemed non-viable and will be disposed of in accordance with HABC's scattered sites strategy. To be auctioned.
MD002/000103 Midtown Apartments 1627 Mosher St. A	1	Unit has been deemed non-viable and will be disposed of in accordance with HABC's scattered sites strategy. To be auctioned.
MD002/000103 Midtown Apartments 1627 Mosher St. B	1	Unit has been deemed non-viable and will be disposed of in accordance with HABC's scattered sites strategy. To be auctioned.
MD002/000200 Scattered Sites 200 404 N. Bradford St.	1	Unit has been deemed non-viable and will be disposed of in accordance with HABC's scattered sites strategy. To be auctioned.
MD002/000200 Scattered Sites 200 702 N. Bradford St.	1 Vacant Lot	Property has been deemed non-viable and will be disposed of in accordance with HABC's scattered sites strategy.
MD002/000200 Scattered Sites 200 705 Mura St.	1	Unit is not viable due to neighborhood conditions and would not provide safe housing for an HABC tenant. To be sold to third party for redevelopment.
MD002/000200 Scattered Sites 200 707 Mura St.	1	Unit is not viable due to neighborhood conditions and would not provide safe housing for an HABC tenant. To be sold to third party for redevelopment.
MD002/000200 Scattered Sites 200 711 Mura St.	1	Unit is not viable due to neighborhood conditions and would not provide safe housing for an HABC tenant. To be sold to third party for redevelopment.
MD002/000200 Scattered Sites 200 721 Mura St.	1	Unit is not viable due to neighborhood conditions and would not provide safe housing for an HABC tenant. To be sold to third party for redevelopment.
MD002/000200 Scattered Sites 200 732 Mura St.	1	Unit is not viable due to neighborhood conditions and would not provide safe housing for an HABC tenant. To be sold to third party for redevelopment.
MD002/000200 Scattered Sites 200 1106 E. Preston St.	1	Property has been deemed non-viable and will be disposed of in accordance with HABC's scattered sites strategy. To be sold to City.

PIC Dev.#/AMP and PIC Dev. Name	Number of Units to be Removed	Explanation for Removal
MD002/000200 Scattered Sites 200 1228 Aisquith St.	1	Unit has been deemed not viable due to an abundance of vacant properties on this block. City to demolish.
MD002/000200 Scattered Sites 200 1301 N. Central Ave. A	1	Unit has been deemed not viable due to an abundance of vacant properties on this block. To be auctioned.
MD002/000200 Scattered Sites 200 1301 N. Central Ave. B	1	Unit has been deemed not viable due to an abundance of vacant properties on this block. To be auctioned.
MD002/000200 Scattered Sites 200 1302 Aisquith St.	1	Unit is not viable due to neighborhood conditions and would not provide safe housing for an HABC tenant. To be auctioned.
MD002/000200 Scattered Sites 200 1601 Aisquith St.	1	Property has been deemed non-viable and will be disposed of in accordance with HABC's scattered sites strategy. To be auctioned.
MD002/000200 Scattered Sites 200 1607 Aisquith St.	1	Property has been deemed non-viable and will be disposed of in accordance with HABC's scattered sites strategy. To be auctioned.
MD002/000200 Scattered Sites 200 1611 Aisquith St.	1	Property has been deemed non-viable and will be disposed of in accordance with HABC's scattered sites strategy. To be auctioned.
MD002/000200 Scattered Sites 200 822 E. North Ave.	1	Property has been deemed non-viable and will be disposed of in accordance with HABC's scattered sites strategy.
MD002/000200 Scattered Sites 200 1015 N. Caroline St.	1	Property has been deemed non-viable and will be disposed of in accordance with HABC's scattered sites strategy.
MD002/000200 Scattered Sites 200 1023 Biddle St.	1	The condition of the adjacent property poses a risk to the structural integrity of this property.
MD002/000200 Scattered Sites 200 1030 Valley St.	1	Unit to be transferred to the Scattered Sites Homeownership Program and will be sold to the current occupant.
MD002/000200 Scattered Sites 200 411 North Ave.	1	Unit to be transferred to the Scattered Sites Homeownership Program and will be sold to the current occupant.
MD002/000200 Scattered Sites 200 1115 Greenmount Ave.	1	Property has been deemed non-viable and will be disposed of in accordance with HABC's scattered sites strategy. To be sold to third party for redevelopment.
MD002/000200 Scattered Sites 200 2208 Sidney Ave.	1	Unit has been deemed non-viable and will be disposed of in accordance with HABC's scattered sites strategy.

PIC Dev.#/AMP and PIC Dev. Name	Number of Units to be Removed	Explanation for Removal
MD002/000200 Scattered Sites 200 1613 Aisquith St.	1	Unit has been deemed non-viable and will be disposed of in accordance with HABC's scattered sites strategy.
MD002/000200 Scattered Sites 200 1221 E. North Ave.	1	Unit has been deemed non-viable and will be disposed of in accordance with HABC's scattered sites strategy.
MD002/000200 Scattered Sites 200 1150 Myrtle Ave.	1	Unit has been deemed non-viable and will be disposed of in accordance with HABC's scattered sites strategy.
MD002/000200 Scattered Sites 200 1006 E. Preston St.	1	Unit has been deemed non-viable due to an abundance of vacant properties on this block. To be auctioned.
MD002/000200 Scattered Sites 200 1831 Hope St.	1	Unit has been deemed non-viable due to an abundance of vacant properties on this block.
MD002/000201 Scattered Sites 201 324 E. 20 ½ St.	1 Vacant Lot	Property has been deemed non-viable and will be disposed of in accordance with HABC's scattered sites strategy.
MD002/000201 Scattered Sites 201 510 E. 26 th St.	1	Unit is not viable due to neighborhood conditions and would not provide safe housing to an HABC tenant. To be auctioned.
MD002/000201 Scattered Sites 201 715 E. 20 th St.	1	Unit has been deemed non-viable due to an abundance of vacant properties on this block. To be auctioned.
MD002/000201 Scattered Sites 201 1309 E. Biddle St.	1 Vacant Lot	Property has been deemed non-viable and will be disposed of in accordance with HABC's scattered sites strategy. To be auctioned.
MD002/000201 Scattered Sites 201 1724 N. Chester St.	1	Unit has been deemed non-viable and will be disposed of in accordance with HABC's scattered sites strategy. To be auctioned.
MD002/000201 Scattered Sites 201 1738 E. North Ave.	1	Unit has been deemed non-viable due to an abundance of vacant properties on this block. To be auctioned.
MD002/000201 Scattered Sites 201 2104 E. Lafayette St.	1	Unit is not viable due to neighborhood conditions and would not provide safe housing to an HABC tenant. To be auctioned.
MD002/000201 Scattered Sites 201 2229 E. Federal St.	1	Unit has been deemed non-viable due to an abundance of vacant properties on this block. To be auctioned.
MD002/000201 Scattered Sites 201 1841 N. Montford Ave.	1	Unit is not viable due to neighborhood conditions and would not provide safe housing to an HABC tenant. To be auctioned.

PIC Dev.#/AMP and PIC Dev. Name	Number of Units to be Removed	Explanation for Removal
MD002/000201 Scattered Sites 201 1819 N. Montford Ave.	1	Unit is not viable due to neighborhood conditions and would not provide safe housing to an HABC tenant.
MD002/000201 Scattered Sites 201 724 McCabe Ave.	1	Unit to be transferred to the Scattered Sites Homeownership Program and will be sold to the current occupant.
MD002/000201 Scattered Sites 201 509 E. 22 nd St.	1	Unit to be transferred to the Scattered Sites Homeownership Program and will be sold to the current occupant.
MD002/000201 Scattered Sites 201 2012 E. 30 th St.	1	Unit to be transferred to the Scattered Sites Homeownership Program and will be sold to the current occupant.
MD002/000201 Scattered Sites 201 618 E. 37 th St.	1	Unit to be transferred to the Scattered Sites Homeownership Program and will be sold to the current occupant.
MD002/000201 Scattered Sites 201 320 E. 27 th St.	1	Unit to be transferred to the Scattered Sites Homeownership Program and will be sold to the current occupant.
MD002/000201 Scattered Sites 201 1401 N. Luzern Ave.	1	Unit to be transferred to the Scattered Sites Homeownership Program and will be sold to the current occupant.
MD002/000201 Scattered Sites 201 318 E. 20 th St.	1 Vacant Lot	HABC plans to execute an exchange agreement with the City of Baltimore for this vacant lot to be included in a City-driven neighborhood revitalization project.
MD002/000201 Scattered Sites 201 320 E. 20 th St.	1 Vacant Lot	HABC plans to execute an exchange agreement with the City of Baltimore for this vacant lot to be included in a City-driven neighborhood revitalization project.
MD002/000201 Scattered Sites 201 324 E. 20 th St.	1 Vacant Lot	HABC plans to execute an exchange agreement with the City of Baltimore for this vacant lot to be included in a City-driven neighborhood revitalization project.
MD002/000201 Scattered Sites 201 336 E. 20 th St.	1 Vacant Lot	HABC plans to execute an exchange agreement with the City of Baltimore for this vacant lot to be included in a City-driven neighborhood revitalization project.
MD002/000201 Scattered Sites 201 324 E. 20 ½ St.	1 Vacant Lot	HABC plans to execute an exchange agreement with the City of Baltimore for this vacant lot to be included in a City-driven neighborhood revitalization project.
MD002/000201 Scattered Sites 201 2002 Barclay St.	1 Vacant Lot	HABC plans to execute an exchange agreement with the City of Baltimore for this

PIC Dev.#/AMP and PIC Dev. Name	Number of Units to be Removed	Explanation for Removal
		vacant lot to be included in a City-driven neighborhood revitalization project.
MD002/000201 Scattered Sites 201 2006 Barclay St.	1 Vacant Lot	HABC plans to execute an exchange agreement with the City of Baltimore for this vacant lot to be included in a City-driven neighborhood revitalization project.
MD002/000201 Scattered Sites 201 2008 Barclay St	1 Vacant Lot	HABC plans to execute an exchange agreement with the City of Baltimore for this vacant lot to be included in a City-driven neighborhood revitalization project.
MD002/000201 Scattered Sites 201 823 N. Fremont Ave. A	1	Unit has been deemed non-viable and will be disposed of in accordance with HABC's scattered sites strategy.
MD002/000201 Scattered Sites 201 823 N. Fremont Ave. B	1	Unit has been deemed non-viable and will be disposed of in accordance with HABC's scattered sites strategy.
MD002/000201 Scattered Sites 201 505 E. 26 th St.	1	Unit is not viable due to neighborhood conditions and would not provide safe housing to an HABC tenant. To be auctioned.
MD002/000201 Scattered Sites 201 527 Beaumont Ave.	1	Unit has been deemed non-viable and will be disposed of in accordance with HABC's scattered sites strategy. To be auctioned.
MD002/000201 Scattered Sites 201 712 E. 20 th St.	1	Unit has been deemed non-viable due to an abundance of vacant properties on this block. To be auctioned.
MD002/000201 Scattered Sites 201 2112 N. Calvert St. A	1 Vacant Lot	To be sold to a developer planning to build new construction townhomes for homebuyers. Prior disposition approval received.
MD002/000201 Scattered Sites 201 2112 N. Calvert St. B	1 Vacant Lot	To be sold to a developer planning to build new construction townhomes for homebuyers. Prior disposition approval received.
MD002/000201 Scattered Sites 201 2114 N. Calvert St. A	1 Vacant Lot	To be sold to a developer planning to build new construction townhomes for homebuyers. Prior disposition approval received.
MD002/000201 Scattered Sites 201 2114 N. Calvert St. B	1 Vacant Lot	To be sold to a developer planning to build new construction townhomes for homebuyers. Prior disposition approval received.
MD002/000201 Scattered Sites 201 719 E. 20 th St.	1	Unit has been deemed non-viable due to an abundance of vacant properties on this block.

PIC Dev.#/AMP and PIC Dev. Name	Number of Units to be Removed	Explanation for Removal
MD002/000201 Scattered Sites 201 320 E. 20 th St.	1 Vacant Lot	Property is non-viable and will be disposed of in accordance with HABC's scattered site strategy.
MD002/000201 Scattered Sites 201 2528 Garrett Ave.	1	Unit is non-viable and will be disposed of in accordance with HABC's scattered site strategy.
MD002/000201 Scattered Sites 201 1910 E. 31 st St.	1	Unit is non-viable and will be disposed of in accordance with HABC's scattered site strategy.
MD002/000201 Scattered Sites 201 2128 N. Calvert St.	1 Vacant Lot	To be sold to a developer planning to build new construction townhomes for homebuyers. Prior disposition approval received.
MD002/000201 Scattered Sites 201 2130 N. Calvert St.	1 Vacant Lot	To be sold to a developer planning to build new construction townhomes for homebuyers. Prior disposition approval received.
MD002/000202 Scattered Sites 202 1324 N. Mount St.	1	Unit has been deemed non-viable due to an abundance of vacant properties on this block. To be auctioned.
MD002/000202 Scattered Sites 202 528 N. Stricker St.	1	Unit is non-viable and will be disposed of in accordance with HABC's scattered sites strategy. To be auctioned.
MD002/000202 Scattered Sites 202 930 W. Franklin St.	1	Unit has been deemed non-viable due to an abundance of vacant properties on this block. To be auctioned.
MD002/000202 Scattered Sites 202 1113 N. Carrollton Ave.	1	Unit has been deemed non-viable due to an abundance of vacant properties on this block. To be auctioned.
MD002/000202 Scattered Sites 202 1213 N. Eden St.	1	Unit is non-viable and will be disposed of in accordance with HABC's scattered sites strategy. Prior disposition approval received; to be auctioned.
MD002/000202 Scattered Sites 202 1404 N. Fulton Ave.	1	Unit is non-viable and will be disposed of in accordance with HABC's scattered sites strategy. To be auctioned.
MD002/000202 Scattered Sites 202 1510 W. Lanvale St.	1	Unit has been deemed non-viable due to an abundance of vacant properties on this block.
MD002/000202 Scattered Sites 202 1702 McKean Ave.	1	Unit is not viable due to neighborhood conditions and would not provide safe housing to an HABC tenant. To be auctioned.

PIC Dev.#/AMP and PIC Dev. Name	Number of Units to be Removed	Explanation for Removal
MD002/000202 Scattered Sites 202 1814 Edmondson Ave. A	1	Unit has been deemed non-viable due to an abundance of vacant properties on this block. To be auctioned.
MD002/000202 Scattered Sites 202 1814 Edmondson Ave. B	1	Unit has been deemed non-viable due to an abundance of vacant properties on this block. To be auctioned.
MD002/000202 Scattered Sites 202 1905 Herbert St.	1	Unit has been deemed non-viable due to an abundance of vacant properties on this block. To be auctioned.
MD002/000202 Scattered Sites 202 914 N. Fremont Ave.	1	Unit has been deemed non-viable due to an abundance of vacant properties on this block.
MD002/000202 Scattered Sites 202 1805 Clifton Ave.	1	Unit is non-viable and will be disposed of in accordance with HABC's scattered sites strategy.
MD002/000202 Scattered Sites 202 1113 N. Gilmore St.	1	Unit to be transferred to the Scattered-Sites Homeownership Program and will be sold to the current occupant.
MD002/000202 Scattered Sites 202 1915 Herbert St.	1	Unit has been deemed non-viable due to an abundance of vacant properties on this block. To be auctioned.
MD002/000202 Scattered Sites 202 516 N. Gilmore St.	1	The condition of the adjacent property poses a risk to the structural integrity of this unit.
MD002/000203 Scattered Sites 203 214 S. Fulton St.	1 Vacant Lot	Property is non-viable and will be disposed of in accordance with HABC's scattered sites strategy. To be auctioned.
MD002/000203 Scattered Sites 203 301 S. Franklinton Rd.	1	Unit is non-viable and will be disposed of in accordance with HABC's scattered sites strategy. To be auctioned.
MD002/000202 Scattered Sites 203 313 N. Fulton Ave.	1	Unit is non-viable and will be disposed of in accordance with HABC's scattered sites strategy. To be auctioned.
MD002/000203 Scattered Sites 203 546 N. Payson St.	1	Unit is non-viable and will be disposed of in accordance with HABC's scattered sites strategy. To be auctioned.
MD002/000203 Scattered Sites 203 1717 N. Smallwood Ave.	1	This unit was severely damaged by fire and would require an extensive rehabilitation in excess of 57.4% of TDC. To be auctioned.
MD002/000203 Scattered Sites 203 1734 W. Lexington St.	1	Unit is non-viable and will be disposed of in accordance with HABC's scattered sites strategy. To be auctioned.

PIC Dev.#/AMP and PIC Dev. Name	Number of Units to be Removed	Explanation for Removal
MD002/000203 Scattered Sites 203 2116 Presbury St.	1	Unit is non-viable and will be disposed of in accordance with HABC's scattered sites strategy.
MD002/000203 Scattered Sites 203 2227 W. Baltimore St. A	1	The condition of the adjacent property poses a risk to the structural integrity of this unit. To be auctioned.
MD002/000203 Scattered Sites 203 2227 W. Baltimore St. B	1	The condition of the adjacent property poses a risk to the structural integrity of this unit. To be auctioned.
MD002/000203 Scattered Sites 203 2428 W. Franklin St.	1	Unit has been deemed non-viable due to an abundance of vacant properties on this block. To be auctioned.
MD002/000203 Scattered Sites 203 2712 Prospect St.	1	Unit is not viable due to neighborhood conditions and would not provide safe housing to an HABC tenant. To be auctioned.
MD002/000203 Scattered Sites 203 2817 Waldorf Ave.	1	Unit is non-viable and will be disposed of in accordance with HABC's scattered sites strategy. To be auctioned.
MD002/000203 Scattered Sites 203 3012 Oakley Ave.	1	Unit is non-viable and will be disposed of in accordance with HABC's scattered sites strategy. To be auctioned.
MD002/000203 Scattered Sites 203 3030 Baker St.	1	This unit was severely damaged by fire and would require an extensive rehabilitation in excess of 57.4% of TDC. To be auctioned.
MD002/000203 Scattered Sites 203 4108 Park Heights Ave.	1	The condition of the adjacent property poses a risk to the structural integrity of this unit. To be auctioned.
MD002/000203 Scattered Sites 203 4202 Park Heights Ave.	1	Unit has been deemed non-viable due to an abundance of vacant properties on this block. City to purchase.
MD002/000203 Scattered Sites 203 4206 Park Heights Ave.	1	Unit has been deemed non-viable due to an abundance of vacant properties on this block. City to purchase.
MD002/000203 Scattered Sites 203 4918 Palmer Ave.	1	Unit is non-viable and will be disposed of in accordance with HABC's scattered sites strategy.
MD002/000203 Scattered Sites 203 610 Glenoden Ave.	1	Unit is non-viable and will be disposed of in accordance with HABC's scattered sites strategy.
MD002/000203 Scattered Sites 203 1824 W. Fairmount Ave.	1	Unit has been deemed non-viable due to an abundance of vacant properties on this block. To be auctioned.

PIC Dev.#/AMP and PIC Dev. Name	Number of Units to be Removed	Explanation for Removal
MD002/000203 Scattered Sites 203 2444 Laurretta Ave.	1	Unit to be transferred to the Scattered Sites Homeownership Program and will be sold to the current occupant.
MD002/000203 Scattered Sites 203 2912 Walbrook Ave.	1	Unit to be transferred to the Scattered Sites Homeownership Program and will be sold to the current occupant.
MD002/000203 Scattered Sites 203 3907 Park Heights Ave.	1	Unit is non-viable and will be disposed of in accordance with HABC's scattered sites strategy. To be auctioned.
MD002/000203 Scattered Sites 203 5318 Beaufort Ave.	1	Unit is non-viable and will be disposed of in accordance with HABC's scattered sites strategy. To be auctioned.
MD002/000203 Scattered Sites 203 5326 Beaufort Ave.	1	Unit is non-viable and will be disposed of in accordance with HABC's scattered sites strategy. To be auctioned.
MD002/000203 Scattered Sites 203 5330 Beaufort Ave.	1	Unit is non-viable and will be disposed of in accordance with HABC's scattered sites strategy. To be auctioned.
MD002/000203 Scattered Sites 203 808 N. Dukeland St.	1	Unit is not viable due to neighborhood conditions and would not provide safe housing to an HABC tenant.
MD002/000203 Scattered Sites 203 1715 W. Lexington St. A	1	Unit is non-viable and will be disposed of in accordance with HABC's scattered sites strategy.
MD002/000203 Scattered Sites 203 1715 W. Lexington St. B	1	Unit is non-viable and will be disposed of in accordance with HABC's scattered sites strategy.
MD002/000203 Scattered Sites 203 302 S. Stricker St.	1	Unit has been deemed non-viable due to an abundance of vacant properties on this block.
MD002/000203 Scattered Sites 203 26 N. Mount St.	1	Unit has been deemed non-viable due to an abundance of vacant properties on this block.
MD002/000109 Stricker St. Apartments 1306 N. Carey St.	1	Unit is not viable due to neighborhood conditions and would not provide safe housing to an HABC tenant. To be auctioned.
MD002/000109 Stricker St. Apartments 1150 N. Carrollton Ave.	1	Unit has been deemed non-viable due to an abundance of vacant properties on this block. To be auctioned.
MD002/000109 Stricker St. Apartments 1323 Mosher St.	1	Unit has been deemed non-viable due to an abundance of vacant properties on this block. To be auctioned.

PIC Dev.#/AMP and PIC Dev. Name	Number of Units to be Removed	Explanation for Removal
MD002/000109 Stricker St. Apartments 1718 W. Presstman St.	1	Unit is non-viable and will be disposed of in accordance with HABC's scattered sites strategy. To be auctioned.
MD002/000109 Stricker St. Apartments 1713 N. Calhoun St.	1	Unit to be transferred to the Scattered Sites Homeownership Program and will be sold to the current occupant.
MD002/000108 Uptown Apartments 913 N. Calhoun St. A	1	Unit is non-viable and will be disposed of in accordance with HABC's scattered sites strategy. To be auctioned.
MD002/000108 Uptown Apartments 913 N. Calhoun St. B	1	Unit is non-viable and will be disposed of in accordance with HABC's scattered sites strategy. To be auctioned.
MD002/000108 Uptown Apartments 915 N. Calhoun St. A	1	Unit is non-viable and will be disposed of in accordance with HABC's scattered sites strategy. To be auctioned.
MD002/000108 Uptown Apartments 915 N. Calhoun St. B	1	Unit is non-viable and will be disposed of in accordance with HABC's scattered sites strategy. To be auctioned.
MD002/000108 Uptown Apartments 917 N. Calhoun St. A	1	Unit is non-viable and will be disposed of in accordance with HABC's scattered sites strategy. To be auctioned.
MD002/000108 Uptown Apartments 917 N. Calhoun St. B	1	Unit is non-viable and will be disposed of in accordance with HABC's scattered sites strategy. To be auctioned.
MD002/000108 Uptown Apartments 920 N. Gilmore St. A	1	Unit has been deemed non-viable due to an abundance of vacant properties on this block. To be auctioned.
MD002/000108 Uptown Apartments 920 N. Gilmore St. B	1	Unit has been deemed non-viable due to an abundance of vacant properties on this block. To be auctioned.
MD002/000108 Uptown Apartments 921 N. Calhoun St.	1	The condition of the adjacent property poses a risk to the structural integrity of this unit. To be auctioned.
MD002/000108 Uptown Apartments 1011 N. Monroe St.	1	Unit has been deemed non-viable due to an abundance of vacant properties on this block. To be auctioned.
MD002/000108 Uptown Apartments 1152 N. Stricker St.	1	Unit is not viable due to neighborhood conditions and would not provide safe housing to an HABC tenant. To be auctioned.
MD002/000108 Uptown Apartments 1344 N. Carey St.	1	Unit is not viable due to neighborhood conditions and would not provide safe housing to an HABC tenant. To be auctioned.

PIC Dev.#/AMP and PIC Dev. Name	Number of Units to be Removed	Explanation for Removal
MD002/000108 Uptown Apartments 1415 Mosher St.	1	Unit is non-viable and will be disposed of in accordance with HABC's scattered sites strategy. To be auctioned.
MD002/000108 Uptown Apartments 1449 N. Carey St.	1	Unit is non-viable and will be disposed of in accordance with HABC's scattered sites strategy. To be auctioned.
MD002/000108 Uptown Apartments 1800 Presbury St.	1	Unit has been deemed non-viable due to an abundance of vacant properties on this block. To be auctioned.
MD002/000108 Uptown Apartments 1808 Presbury St.	1	Unit has been deemed non-viable due to an abundance of vacant properties on this block. To be auctioned.
MD002/000200 Scattered Sites 200 1009 Brentwood Ave.	1	Unit to be transferred to the Scattered Sites Homeownership Program and will be sold to the current occupant.
MD002/000200 Scattered Sites 200 1617 Calvert St.	1	Unit to be transferred to the Scattered Sites Homeownership Program and will be sold to the current occupant.
MD002/000202 Scattered Sites 202 1508 Presstman St.	1	Unit to be transferred to the Scattered Sites Homeownership Program and will be sold to the current occupant.
MD002/000201 Scattered Sites 201 1901 Kennedy Ave.	1	Unit to be transferred to the Scattered Sites Homeownership Program and will be sold to the current occupant.
MD002/000203 Scattered Sites 203 2927 Walbrook Ave.	1	Unit to be transferred to the Scattered Sites Homeownership Program and will be sold to the current occupant.
MD002/000203 Scattered Sites 203 2843 W. Lafayette Ave.	1	Unit to be transferred to the Scattered Sites Homeownership Program and will be sold to the current occupant.
MD002/000203 Scattered Sites 203 1731 Hollins St.	1	Unit to be transferred to the Scattered Sites Homeownership Program and will be sold to the current occupant.
MD002/000123 Thompson 22 3323 Chesley Ave.	1	Unit to be transferred to the Scattered Sites Homeownership Program and will be sold to the current occupant.
MD002/000202 Scattered Sites 202 750 W. Hamburg St.	1	Unit to be transferred to the Scattered Sites Homeownership Program and will be sold to the current occupant.
MD002/000200 Scattered Sites 200 749 E. Preston St.	1	Unit to be transferred to the Scattered Sites Homeownership Program and will be sold to the current occupant.

PIC Dev.#/AMP and PIC Dev. Name	Number of Units to be Removed	Explanation for Removal
MD002/000200 Scattered Sites 200 12 S. Chester St.	1	Unit to be transferred to the Scattered Sites Homeownership Program and will be sold to the current occupant.
MD002/000200 Scattered Sites 200 10 S. Chester St.	1	Unit to be transferred to the Scattered Sites Homeownership Program and will be sold to the current occupant.
MD002/000200 Scattered Sites 200 735 E. Preston St.	1	Unit to be transferred to the Scattered Sites Homeownership Program and will be sold to the current occupant.
MD002/000200 Scattered Sites 200 2104 E. Fairmount Ave.	1	Unit to be transferred to the Scattered Sites Homeownership Program and will be sold to the current occupant.
MD002/000200 Scattered Sites 200 513 Otterbein St.	1	Unit to be transferred to the Scattered Sites Homeownership Program and will be sold to the current occupant.
MD002/000200 Scattered Sites 200 1121 Race St.	1	Unit to be transferred to the Scattered Sites Homeownership Program and will be sold to the current occupant.
MD002/000200 Scattered Sites 200 947 E. Chase St.	1	Unit to be transferred to the Scattered Sites Homeownership Program and will be sold to the current occupant.
MD002/000200 Scattered Sites 200 811 Woodward St.	1	Unit to be transferred to the Scattered Sites Homeownership Program and will be sold to the current occupant.
MD002/000203 Scattered Sites 203 4010 Hayward St.	1	Unit to be transferred to the Scattered Sites Homeownership Program and will be sold to the current occupant.
MD002/000205 Scattered Sites (Bailey) 168 S. Kossuth St.	1	Unit to be transferred to the Scattered Sites Homeownership Program and will be sold to the current occupant.
MD002/000205 Scattered Sites (Bailey) 2410 Elsinore Ave.	1	Unit to be transferred to the Scattered Sites Homeownership Program and will be sold to the current occupant.
MD002/000123 Thompson 22 3409 Royston Ave.	1	Unit to be transferred to the Scattered Sites Homeownership Program and will be sold to the current occupant.
MD002/000123 Thompson 22 1446 Medfield Ave.	1	Unit to be transferred to the Scattered Sites Homeownership Program and will be sold to the current occupant.
MD002/000123 Thompson 22 1349 Cedarcroft Rd.	1	Unit to be transferred to the Scattered Sites Homeownership Program and will be sold to the current occupant.

PIC Dev.#/AMP and PIC Dev. Name	Number of Units to be Removed	Explanation for Removal
MD002/000200 Scattered Sites 200 820 E. North Ave.	1	This unit has been deemed nonviable due to an abundance of vacant properties on the block.
MD002/000203 Scattered Sites 203 2418 W. Franklin St.	1	This unit has been deemed nonviable due to an abundance of vacant properties on the block.
MD002/000109 Stricker St. Apartments 1734 N. Calhoun St.	1	Unit is not viable due to neighborhood conditions and would not provide safe housing for an HABC tenant.
MD002/000200 Scattered Sites 200 1255 Riverside Ave.	1	Unit to be transferred to the Scattered Sites Homeownership Program and will be sold to the current occupant.
36 Lloyd St.	1 Vacant Lot	This lot will be disposed of pursuant to a Land Exchange Agreement with the Associated Jewish Charities for redevelopment in connection with the organization's campus.
38 Lloyd St.	1 Vacant Lot	This lot will be disposed of pursuant to a Land Exchange Agreement with the Associated Jewish Charities for redevelopment in connection with the organization's campus.
1014 E. Lombard St.	1 Vacant Lot	This lot will be disposed of pursuant to a Land Exchange Agreement with the Associated Jewish Charities for redevelopment in connection with the organization's campus.
1016 E. Lombard St.	1 Vacant Lot	This lot will be disposed of pursuant to a Land Exchange Agreement with the Associated Jewish Charities for redevelopment in connection with the organization's campus.
1018 E. Lombard St.	1 Vacant Lot	This lot will be disposed of pursuant to a Land Exchange Agreement with the Associated Jewish Charities for redevelopment in connection with the organization's campus.
1020 E. Lombard St.	1 Vacant Lot	This lot will be disposed of pursuant to a Land Exchange Agreement with the Associated Jewish Charities for redevelopment in connection with the organization's campus.
TOTAL	1,178	

iii. Planned New Project-Based Vouchers

HABC plans to enter into an Agreement to Enter into Housing Assistance Payment (AHAP) Contracts or HAP contracts for 348 new project-based units in FY 2023, as shown in Table 3. Actual contract/leasing figures may vary based on multiple factors, including new and/or

additional projects approved by the HABC Board during the Plan Year, HUD RAD processing timetables and other considerations.

Table 3: Planned New Project-Based Vouchers

Property Name	Number of Vouchers to be Project-Based	RAD?	Description of Project
Somerset 4	66	Yes	Somerset Phase 4 is a part of the larger Perkins Somerset Oldtown (PSO) project, upon completion the project will include 1,345 units of mixed income housing.
Belvedere Place	11	No	11 units thru competitive process at 3101 W Belvedere Ave applied to RFP B-1922-20.
Townes at the Terraces	202	Yes	Blend of RAD PBV and PBV. This project is located within a Choice Neighborhoods Transformation Plan footprint in Southwest Baltimore and will include the complete renovation of all rental dwelling units.
Laurens House	36	Yes	RAD PBV. Renovation of all dwelling units for elderly persons over 62 years old and non-elderly persons with disabilities. Located in West Baltimore.
Carey House	23	Yes	RAD PBV. Renovated of all dwelling units for elderly persons over 62 years old and non-elderly persons with disabilities. Located in West Baltimore.
Red Maple Place (Thompson)	10	No	56-unit project in Towson in Baltimore County.
Total Planned New Project-Based Vouchers	348		

iv. Existing Project-Based Vouchers

HABC will continue to provide voucher-based operating support for a large portfolio of existing units under contract in the PBV program or units for which an Agreement to Enter into Housing Assistance Payments (AHAP) Contract is in place. Table 4 includes only those project-based vouchers in which at least an AHAP is in place as of 12/31/2022. As noted, there are 2,980 units in this category. Actual contract/leasing figures may vary based on multiple factors, including contract terminations or suspensions, new and additional projects approved by the HABC Board during the Plan year, HUD RAD processing timetables and other considerations.

Table 4: Planned Existing Project-Based Vouchers

Property Name	Number of Project-Based Vouchers	Planned Status at End of FY 2023	RAD?	Description of Project
18 W. Read St., Inc.	10	Leased	No	10 1bd NED units at 18 W. Read St.
1234 McElderry St	50	Leased	No	13 1bd, 24 2bd and 13 3bd units for PH replacement at 1234 McElderry St.
214 E. Biddle St.	5	Leased	No	5 1bd NED units at 214 E. Biddle St.
22 Light Street Apts	2	Leased	No	2 LTA UFAS units located at 22 Light Street.
2301 N. Charles St., Inc.	7	Leased	No	2 efficiencies and 5 1bd NED/UFAS units at 2301 N. Charles St.
Alcott Place	28	Leased	No	28 1bd units at 2702 Keyworth Ave.
Artaban Ashburton Apartments	14	Leased	No	14 1bd NED units at 5906 Park Heights Ave.
Arbor Oaks	62	Committed	Yes	Conversion of 62 public housing units to a RAD/Section 18 Blend; 38 RAD PBV and 24 regular PBV. Renovation of all walk-up units in 3 garden apt. communities
Ashland Commons	12	Leased	No	12 1bd (8-NED) units at 1715 E Eager St.
Barclay	19	Leased	No	1 1bd, 1 2bd, and 17 3bd (1-NED, 4-UFAS) units at 2106-2234 Barclay St.
Barclay II (North Barclay Green)	15	Leased	No	11 1bd NED and 4 2bd UFAS units at 341 E. 20 th St.
Barrister Court	8	Leased	No	2 efficiencies, 5 1bd, and 1 2bd UFAS unit at 1300 Washington Blvd.
Beacon House Square	56	Committed	No	56 units located at 3549-3601 Old Frederick Road with a designation for PB for Veterans
Belvieu Gardens	10	Leased	No	10 1bd NED units at 3915-3921 Belvieu Ave.
Belleviu Manchester	8	Leased	No	8 1bd units at 342 Bloom St.
Bennett House	25	Leased	No	24 SROs and 1 1bd unit at 14 E Franklin St. designated to provide supportive services to low-income residents

Property Name	Number of Project-Based Vouchers	Planned Status at End of FY 2023	RAD?	Description of Project
Bon Secours – Gibbons	20	Leased	No	12 1bd NEDs, 4 2bd and 4 3bd UFAS units at 900 Desoto Rd.
Bon Secours – New Shiloh	19	Leased	No	16 1bd (11-NED), 2 2bd and 1 3bd units at 1930 Windsor Ave. (8-PB Homeless)
Brexton Chase	7	Leased	No	7 1bd NED units at 241 W. Chase St.
Brick by Brick	2	Leased	No	2 1bd NED units at 903 Gorsuch Ave.
Butchers Row	9	Leased	No	3 1bd, 2 2bd, and 4 3bd units at E. Baltimore St.
Calvert Street Properties	18	Leased	No	18 1bd NED units at 1625 N. Calvert St.
Calverton House	14	Leased	No	13 SROs and 1 efficiency at 119 E. 25 th St.
Chapel Green	20	Leased	No	8 1bd NED units and 12 3bd (4-UFAS) units at Chase, Wolfe, and Washington Streets
Cherry Hill Senior Housing	50	Leased	No	48 1bd NED units and 2 2bd UFAS units at 901 Cherry Hill Rd.
Cherrydale	32	Leased	No	32 1bd NED units at 1118 Cherry Hill Rd.
City Arts	11	Leased	No	11 1bd NED units at 440 E. Oliver St.
City Arts II	15	Leased	No	12 1bd NED and 3 2bd UFAS units at 1700 Greenmount Ave.
Clare Court Apartments	15	Leased	No	5 1bd, 7 2bd and 3 4bd (7-NED, and 3-UFAS) units at 3725 Ellerslie Ave.
Clarks Lane	6	Leased	No	6 1bd NED units at 3901 Clarks Ln.
Clarksvie, LLC	8	Leased	No	8 1bd NED units at 3701-3711 Clarks Ln.
Coel-Grant Higgs	57	Leased	No	32 efficiencies and 25 1bd (6-UFAS) units at 1700 N Gay St.
Coleman Manor	49	Leased	No	49 1bd (8-NED, 5-UFAS) units at Walbrook Ave.
Columbus School Apts.	8	Leased	No	8 1bd units at 2000 E North Ave
Community Housing	6	Leased	No	1 efficiency, 1 1bd, 1 2bd, and 3 3bd scattered site units
Dayspring	18	Leased	No	17 2bd and 1 3bd transitional units at 1125 Patterson Park

Property Name	Number of Project-Based Vouchers	Planned Status at End of FY 2023	RAD?	Description of Project
DiMaggio Scattered Sites	23	Leased	No	8 2bd, 10 3bd, 4 4bd, and 1 5bd units designated for chronically homeless households at scattered sites
Dominion Properties	7	Leased	No	3 1bd NED units and 4 3bd units at 1617 Dukeland Ave., 6 th St., Hilton and Monument Streets
Dorchester Apts.	10	Leased	No	10 1bd NED units at 4300 Liberty Heights Ave.
Druid Hill LTD	12	Leased	No	10 2 bd and 2 3bd units at 1621 Druid Hill Ave.
Druid House	19	Leased	No	8 2bd and 11 3bd units at McCulloh St.
Epiphany House	33	Leased	No	33 efficiencies at 5610 York Rd.
Fallstaff Apts.	4	Leased	No	2 1bd NED units, 1 2bd and 1 3bd (1-UFAS) units at 3800-3810 Fallstaff Rd.
Fells Point Station	14	Leased	No	11 1bd and 3 2bd (6-NED, 8-UFAS) units at 1621 Bank St.
Four Ten Loft Apts	20	Leased	No	20 - 1bd units at 410 N Eutaw St designated to homeless.
Franklin Flats	7	Leased	No	7 1bd NED units at 20 E. Franklin St.
Greenmount & Chase	19	Leased	No	19 units (11-1bd, 5-2bd, 3-3bd) consisting of 2 LTA NEDs, 2 LTA UFAS and 4 units designated for chronically homeless.
Greens at Irvington Mews	20	Leased	No	20 - 1bd NED units at 4300 Frederick Ave.
Harry & Jeannette Weinberg Place	116	Leased	No	39-0bd, 74-1bd, and 3-2bd units at 2500 W. Belvedere Ave.
Holden Hall	14	Leased	No	14 SRO units at 761 W. Hamburg St.
Hollander Ridge	94	Leased	Yes	19 – 1bd, 32-2bd, 35-3bd, and 8-4bd units converted from LIPH to PBV located at scattered units through Baltimore City.
Indecco	9	Leased	No	2 efficiencies and 7 1bd units at 940 S. Lakewood Ave.

Property Name	Number of Project-Based Vouchers	Planned Status at End of FY 2023	RAD?	Description of Project
Independence Place	21	Leased	No	11 1bd and 10 2bd units designated for chronically homeless households at 4101½ Old York Rd.
Irvington Woods	57	Leased	No	11 1bd NED and 46 2bd units at 4102-4126 Potter St.
JByrd	3	Leased	No	3 1bd NED units at Windsor Mill Rd.
Jenkins House	22	Leased	No	20 SRO and 2 1bd units at 2226 Maryland Ave.
John Manley House	5	Leased	No	5 1bd NED units at 5304 Harford Rd.
Keys Pointe – Phase 1B	34	Leased	No	19 1bd, 8 2bd, 4 3bd and 3 4bd (11-NED, 4-UFAS) units at Cardiff, Jarmon, Hornell, Boston and Gallop Streets
L on Liberty	14	Leased	No	14 1bd (all NED) units at 216 N Liberty St.
Lillian Jones Apts.	22	Leased	No	14 1bd NED, 2-2bd and 6-3bd UFAS units at 1303 Greenmount Ave.
M on Madison	23	Leased	No	23 1bd NED units at 301 W. Madison St.
Marian House	8	Leased	No	4 SRO and 4 3bd units at 949 Gorsuch Ave.
Marian House II	5	Leased	No	5 1bd (3-NED, 2-UFAS) units at 932 Gorsuch Ave.
Mary Harvin Center	8	Leased	No	8 1bd units at 1600 N. Chester St.
Metro Heights at Mondawmin	18	Leased	No	13 1 bd, 2 2bd and 3 3 bd (10-NED, 1-UFAS) units, some designated for chronically homeless households at 2700 Reisterstown Rd.
Milford Station	6	Leased	No	6 1bd NED units at 3900 W. Northern Pkwy.
Moravia	60	Leased	No	57 1bd and 3 2bd units (9-NED, 6-UFAS) at 6050 Moravia Park Dr.
Mount Royal Apts.	5	Leased	No	5 1bd units at 1512 W. Mt. Royal Ave.
Mulberry at Park Apts.	19	Leased	No	11 1bd NED units, 2 2bd and 6 3bd UFAS units at 211 W. Mulberry St.
North Barclay Green III	12	Leased	No	9 1bd units and 3 3bd UFAS units at E. 21 st St. and Greenmount Ave.
North Avenue Gateway	16	Leased	No	11 1bd NED units and

Property Name	Number of Project-Based Vouchers	Planned Status at End of FY 2023	RAD?	Description of Project
				5 2bd units at 3001-3003 W. North Ave.
North Avenue Gateway II	16	Leased	No	10 1 bd NED units and 6 1bd units at 3044 W. North Ave designated for chronically homeless.
Oaks at Liberty	45	Leased	No	45 1bd units at 3501 Howard Park Ave.
O'Donnell Heights	42	Leased	No	16 1bd (12-NED) units, 12 2bd units, 13 3bd units, and 1 4bd unit (4-UFAS)
Orchard Ridge I-V	197	Leased	No	119 1bd units, 42 2bd units, 32 3bd units, 3 4bd units and 1 5bd unit (52-NED, 27-UFAS) at Orchard Ridge Blvd., Green Rose and Maple Shade Dr.
Paca House	82	Leased	No	41 efficiencies and 41 1bd units at 116 N. Paca St. 63 units are designated for homeless and 19 units for veteran populations.
Parktown-Cason Arms	12	Leased	No	8 1bd NED units and 4 2bd UFAS units at 4637 Park Heights Ave.
Penn North	15	Leased	No	14 1bd NED units and 1 3bd UFAS unit at 2600 Pennsylvania Ave.
Penn Square II	15	Leased	No	12 1bd NED and 3 3bd UFAS units at 2600 Pennsylvania Ave.
Parkwood	3	Leased	No	3 1bd NED units at scattered sites
Perkins 1	48	Committed	Yes	Blend of 20 RAD PBV and 28 PBV units
Perkins 2	52	Committed	No	52 RAD PBV units at PSO
Perkins 2	16	Committed	No	16 RAD PBV units at PSO
Perkins 2	8	Committed	No	8 PBV units at PSO
Poppleton II	15	Leased	No	11 1bd NED units and 4 3bd UFAS units at 838 W. Fairmount Ave.
Poppleton III	10	Leased	No	7 1bd NED units, 1 2bd UFAS and 2 3bd UFAS units at 866 W. Fayette St.
Pratt Street	35	Leased	No	27 2bd and 8 3bd units at 1700 W Pratt St. – transitional housing
Restoration Gardens	43	Leased	No	40 efficiencies and 3 1bd units designated for homeless youth at 3701 Cottage Ave.

Property Name	Number of Project-Based Vouchers	Planned Status at End of FY 2023	RAD?	Description of Project
Restoration Gardens II	42	Leased	No	42 efficiencies (3-UFAS units) designated for homeless youth at 4201 York Rd.
Seminole Apartments	6	Leased	No	6 1bd NED units at 4300 Seminole Ct.
Sharon Towers	10	Leased	No	10 2bd units at 4-6 N. Carey St.
Sharp Leadenhall	4	Leased	No	4 1bd units (3-UFAS) at Race and West Streets
Sojourner at Argyle Apartments	12	Leased	No	12 1bd (2-UFAS) units designated for chronically homeless households at 1411 Argyle St.
Sojourner Place at Preston *	35	Committed	No	25-1bd, 5-2b, and 5-3bd units located at 1201 E Preston St.
Somerset 2 (520 Somerset Apartments)	44	Committed	Yes	44 RAD PBV units at PSO 520 Somerset Street
Somerset 2 (525 Aisquith Apartments)	23	Committed	Yes	23 RAD PBV units at PSO 525 Aisquith Street
Somerset 2 (525 Aisquith)	33	Committed	No	33 PBV Blend Units at PSO
Somerset 3	36	Committed	Yes	15 RAD PBV units at PSO and 21 PBV units
Somerset Court Extensions	7	Leased	No	7 PBV units designated for NEDs
St. Stephens	15	Leased	No	15 1bd NED units at 3900 Roland Ave.
St. Vincent DePaul	9	Leased	No	8 2bd and 1 3bd units at Ulman Ave.
St. Vincent DePaul	5	Leased	No	1 3bd and 4 4bd units designated for chronically homeless households at Bond St. and Cottage Ave.
Symphony Home at Purdue	6	Leased	No	6 1bd units at 5683 Purdue Ave.
Union Ave. – Buena Vista Apartments	48	Leased	Yes	15 1 bd and 33 2 bd units converted through Rental Assistance Demonstration (RAD-2) at 1420-1436 Union Ave.
Uplands	62	Leased	No	24 1bd, 31 2bd, and 7 3bd units (16-NED, 6-UFAS) at 4520 Scarlet Oak Ln.
Walbrook Mills Apts	1	Leased	No	1 3bd (UFAS) unit at 2636 W North Ave.

Property Name	Number of Project-Based Vouchers	Planned Status at End of FY 2023	RAD?	Description of Project
Wayland Village	45	Leased	No	45 1bd (14-NED) units at 3020 Garrison Blvd.
Weinberg Family Center – 1209 Rose	8	Leased	No	5 2bd and 3 3bd units designated for chronically homeless households at 1209 N. Rose St.
Weinberg Family Center – Guadenzia at Park Heights	18	Leased	No	14 2bd and 4 3bd units designated for chronically homeless households at 4613 Park Heights Ave
Weinberg Manor East	75	Leased	No	10 SRO, 41 efficiencies, and 24 1bd units (10-NED, 5-UFAS) at 3601 Fords Ln.
Weinberg Manor South	14	Leased	No	14 1bd NED units at 3617 Fords Ln.
Westminster House	163	Leased	No	103 efficiencies, 55 1bd, and 5 2bd units at 524 N. Charles St.
Berger Square (Thompson)	10	Leased	No	A project located in Odenton in Anne Arundel County, near transit, employment centers near Fort Meade and Arundel Mills, and close to the MARC station.
Burgess Mills (Thompson)	20	Leased	No	A 198 unit mixed-income project located in Ellicott City in Howard County.
Eagle Park Thompson	12	Committed	No	New construction in Hanover in Anne Arundel County, with 12 project-based units.
Ellicott Gardens II (Thompson)	14	Committed	No	A 70-unit project located in Ellicott City in Howard County, a second phase of an existing project.
Scattered Sites -Pilatus Opportunity Fund (Thompson)	30	Leased	No	Scattered site units in high-opportunity areas throughout the region.
Scattered Sites -Harford Home Rentals (Thompson)	10	Leased	No	Scattered site units in high-opportunity areas throughout the region.
Scattered Sites – Fort 700 (Thompson)	5	Leased	No	Scattered site units in high-opportunity areas throughout the region.
Homes at Fountain Green (Thompson)	10	Leased	No	New construction in Harford County, of which 10 units will be BRHP project-based units. Project is currently at 97% construction completion and leasing will begin in

Property Name	Number of Project-Based Vouchers	Planned Status at End of FY 2023	RAD?	Description of Project
				coming month
Total Planned Existing PBVs	2,980			

*Incorrectly excluded from prior plans and reports.

v. Planned Other Changes to MTW Housing Stock Anticipated During the Plan Year

HABC previously completed an asset review of the Scattered Sites inventory, which was submitted to the local HUD office. The review provides a roadmap and framework for demolition and/or disposition of obsolete units as well as the preservation of existing units, using the following strategies:

- Disposition or Sale to the City;
- Homeownership;
- Third Party Sales;
- Baltimore Affordable Housing Development, Inc. (BAHD); and,
- Sales via Auction.

HABC continues to use this approach to inform changes in MTW housing stock.

vi. General Description of All Planned Capital Expenditures During the Plan Year

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 5. 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 \$20 million on capital-related activities in FY 2023. 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 Expenditures During the Plan Year

No.	Development Name	Description of Work	FY 2023 Planned Expenditures
1.	Latrobe Homes	Control panel line; Brick work & tuckpointing; Add bypass to system around heating control valve; Replace the DP valves and install new isolation valves	\$1,225,000
2.	McCulloh Homes	Window replacement; Install filtration system on the make-up; Boiler pipe distribution to units	\$1,798,000
3.	Perkins Homes	Site Prep	\$130,000
4.	Poe Homes	Emergency repairs; Relocation activities	\$900,000
5.	Douglass Homes	Exterior Doors	\$250,000
6.	Gilmor Homes	Condensate unit and Sump Pump, Boiler and DHW System Upgrade, Boiler Room Office Upgrade	\$1,543,366
7.	O'Donnell Heights	Emergency repairs	\$200,000
8.	Cherry Hill Homes	Install filtration system for heating; Waterproofing and tuckpointing; Sump pump; Repair crawl space door hatch door hinges latches throughout site; Replace bathroom exhaust fans in md 017; Install new water treatment system in the boiler plant; Storage tank replacement for individual building; Install new heat pump system the stock room	\$4,669,249
9.	Brooklyn Homes	Window security screens; Renovate management and maintenance offices	\$298,800
10.	Westport Homes	Install security system with cameras; Erosion control	\$90,000
11.	Mount Winans	Roofing	\$560,000
12.	Rosemont	Vacant building close-up	\$137,111
13.	Scattered Sites	Roof & window replacement; Limited lead-free painting; Tenant Council office	\$600,000
14.	Authority-Wide	Various kitchen, bathroom and window replacement; Electrical & mechanical work; Vacancy renovation; Surveillance cameras & exterior lighting; Building signage; Concrete, asphalt & street repairs	\$3,805,665
15.	Authority-Wide	RAD Subsidy	\$595,828
16.	Authority-Wide	A&E and Environmental consulting fees	\$220,000
17.	Authority-Wide	Legal, Planning, IT and Utility consulting fees	\$175,000
18.	Central Office	Administrative & operating costs; Overhead; Sundry; Audit fees	\$2,894,393
TOTAL			\$20,092,412

Planned Capital Expenditures During the Plan Year

[Infrastructure and Extraordinary Maintenance](#)

In FY 2023 HABC will continue to develop and adjust its master planning to note physical areas of concern and plan the course of action to correct them (safety and security concerns, code upgrades, landscaping, paving and infrastructure, etc.). We will continue to perform planned major renovations at the family developments and scattered site inventory with an emphasis on vacancy reduction. HABC and our Development partners continue the demolition and site preparation for the redevelopment of Perkins Homes and HABC continues relocation activities at Poe Homes in preparation for its redevelopment.

Additionally, HABC is working with Baltimore City's Information Technology office on a program to provide affordable w-fi access to our public housing residents. This initiative is still in the planning stage.

[Special Construction and Demolition/Disposition of Public Housing Units](#)

HABC received HUD approval for the demolition of the long-term vacant day care center at Westport Homes in 2022 and is working through the environmental and permit issues so demolition can take place. It is anticipated to be demolished late 2022 or early 2023. In addition, Phase 3 of demolition at Perkins Homes, consisting of 415 units, pursuant to the PSO Transformation Plan will begin by the third quarter of 2022 and is projected to be complete in the second quarter of 2023.

[Energy Performance Contracting & Resident Billing / Metering](#)

HABC continues to monitor, measure, and verify work performed under the Phase 1 Energy Performance Contract (EPC 1). EPC 2 is under construction with all work is complete except for the Combined Heat and Power System(s) [CHP] at Douglass Homes and the Scattered Site Energy Conservation Measures [ECMs] which are scheduled to be completed by the end of 2022.

[Safety & Security Initiatives](#)

HABC's Security Operations Manager will continue to work in partnership with the Baltimore Police Department, the Mayor's Office of Neighborhood Safety and Engagement and Baltimore City's Information and Technology office to implement and expand safety and security efforts at all HABC properties. Key initiatives include the expansion and maintenance of Citiwatch Closed Circuit Television cameras, as well as physical safety improvements at the sites, including fencing, bollards, lighting and window screening.

[Facilities & Real Estate](#)

HABC continues to assess its facilities needs and renovates or improves as necessary across our Developments and Leased spaces. Work is ongoing on the disaster recovery/emergency response system planned for the Duncanwood facility to be completed in FY 2023.

B. Leasing Information

i. Planned Number of Households Served

Table 6 provides information on the MTW households projected to be served by HABC as of the end of FY 2023.

Table 6: Planned Number of Households Served at the End of FY 2023

Planned Number of Households Served Through:	Planned Number of Units Months Occupied/Leased	Planned Number of Households to be Served
MTW Public Housing Units Leased	71,268	5,939
MTW Housing Choice Vouchers (HCV) Utilized*	167,340	13,945
MTW Thompson Housing Choice Vouchers**	51,852	4,321
Local, Non-Traditional: Tenant-Based	0	0
Local, Non-Traditional: Property-Based	0	0
Local, Non-Traditional: Homeownership	0	0
Planned Total Households Served	290,460	18,266

*Includes MTW TBVs (Non-Consent Decree), MTW PBVs (Non-Consent Decree), MTW TBVs Bailey and MTW PBVs Bailey

**Includes MTW PCD Thompson Vouchers, MTW Remedial Thompson Vouchers and MTW Homeownership Thompson Vouchers

Table 7: Local, Non-Traditional Housing Programs

Local, Non-Traditional Category	MTW Activity Name/Number	Planned Number of Units Months Occupied/Leased	Planned Number of Households to Be Served
Tenant-Based	N/A	0	0
Property-Based	N/A	0	0
Homeownership	N/A	0	0
Planned Households Served – Local, Non-Traditional Programs		0	0

ii. Discussion of Any Anticipated Issues/Possible Solutions Related to Leasing

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

Table 8: Anticipated Issues and Possible Solutions Related to Leasing

Housing Program	Description of Anticipated Leasing Issues and Possible Solutions
MTW Public Housing	HABC will continue to offer leasing incentives to families who agree to lease units in HABC identified hard to lease developments.
MTW Housing Choice Voucher	HABC anticipates that rising rental costs, lack of available affordable units and condition of housing stock may impact HABC’s leasing efforts. HABC has implemented a series of leasing incentives which are designed to increase landlord participation, including new landlords and new units, in the program. Additionally, HABC is proposing to provide security deposit assistance to further assist families in successful leasing. HABC has hired additional leasing staff to reduce the time for RFTA processing which in turn will result in expedited leasing and greater utilization.
BRHP	No leasing issues are anticipated

C. Waiting List Information

i. Waiting List Information Anticipated

HABC maintains its waiting list in conformance with the policies described in the Public Housing Admissions and Continued Occupancy Policy (ACOP) and the Housing Choice Voucher Program (HCVP) Administrative Plan. Table 9 provides a summary of required waiting list information.

Table 9: Waiting List Information Anticipated

Waiting List Name	Description	Number of Households on Waiting List	Waiting List Open, Partially Open or Closed	Plans to Open the Waiting List During the Plan Year
Federal MTW Public Housing	Community Wide	16,030	Closed	No
Federal Public Housing-Mixed Population	RAD Waiting List	4,463	Closed	No
Federal MTW Housing Choice Voucher Units: Tenant-Based	Community Wide	9,840	Open	Will remain open in 2023
Federal MTW Housing Choice Voucher Units: Project-Based	Site-Based	7,642	Closed	Open, only as needed
RAD Choice Mobility	Program Specific	100	Open	Remains open

Waiting List Name	Description	Number of Households on Waiting List	Waiting List Open, Partially Open or Closed	Plans to Open the Waiting List During the Plan Year
Thompson Vouchers *	Program Specific	13,626	Closed	No

**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.*

Describe any duplication of applicants across waiting lists:

Applicants may apply to more than one waiting list, i.e., public housing and HCV; therefore, there may be duplication across waiting lists.

ii. Planned Changes to the Waiting List in the Plan Year

Waiting List Name	Description of Planned Changes to the Waiting List
MTW Housing Choice Voucher Waiting List	No changes are anticipated in FY 2023 for the HCV program waiting list
MTW Public Housing Waiting List	No changes are anticipated in FY 2023 for the PH program waiting list
RAD Choice Mobility Waiting List	In FY 2023, HCVP anticipates setting aside 1/3 of its turnover vouchers for the Choice Mobility option. The number of vouchers issued for FY 2023 is dependent on FY 2022 attrition.
Thompson Vouchers	No Changes are anticipated

III. Proposed MTW Activities

This section of the MTW Annual Plan provides information on new MTW activities proposed for FY 2023.

There are no proposed MTW activities for FY 2023.

IV. Approved MTW Activities

This section of the MTW Annual Plan summarizes and provides a status update on MTW activities that have been previously approved by HUD and implemented by HABC. As required, this section also includes summary information on MTW activities that have not been implemented, have been closed out, or activities placed on hold by HABC.

A. Implemented Activities

Activity #2006-01: Streamlined Recertification Process (Formerly Multi-Year Recertifications)

Plan Year Approved, Implemented, Amended

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

Description/Update

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 (with annual updates to verify family composition).
- PH and HCV Families with 100% Fixed Income.

Annual Recertification

- PH families reporting zero income or minimal income. Minimal income is defined as less than \$2,400 in household gross income annually.
- 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)).

In FY 2020, HABC limited the number of voluntary interim recertifications between regular recertifications as outlined below for the HCV program only. Required interim recertifications will not count against the limit on voluntary interim recertifications, i.e. interim recertifications required for changes in family composition. Elderly/disabled families and families in the FSS program are exempt from the limit on interim recertifications.

- One voluntary interim recertification between annual recertifications for families with an annual recertification frequency.
- Two voluntary interim recertifications between biennial recertifications for families on a biennial recertification frequency.
- Three voluntary interim recertifications between triennial recertifications for families on a triennial recertification frequency.

HABC has implemented a hardship policy whereby families whose loss of income represents a reduction in gross annual income and where the loss of income is beyond the family’s control, can request an exemption to the limit on interim recertifications to allow for an additional interim recertification.

Additionally, HABC conducts annual recertifications for PH families reporting minimal income. Minimal income is defined as less than \$2,400 in household gross income annually.

Under the streamlined recertification activity, HABC has extended the threshold for the age of documents when received by HABC from 60 days to 120 days for the Public Housing Program only.

During periods of declared emergencies, HCVP will waive the limit on voluntary interim recertifications.

Planned Non-Significant Changes

There are no non-significant changes planned in FY 2023.

Planned Changes to Metrics/Data Collection

Existing metrics have been updated to reflect the anticipated outcomes in FY 2023.

Metrics

CE #2: Staff Time Savings

Unit of Measurement	Baseline*	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease)	Biennial and Triennial			
	PH: 23,920 hours HCV: 27,715 hours	PH: 7,715 hours 3,086 biennial and triennial recertifications completed X 2.5 hours/recert = 7,715 hours HCV: 18,268 hours 7,307 biennial and triennial recertifications completed X 2.5 hours/recert = 18,268 hours		
	Limit on Interims			
	HCV interims: 3,231 Time per interim: 45 min. HCV time on interims: 2,423 hours	HCV: interims: 1,600 Time per interim: 45 min. HCV time spent on interims: 1,200 hours		
*Assumed 2/3 of the interims completed were for voluntary purposes, i.e. change in income and the remaining 1/3 were for required purposes.				

Planned Significant Changes

No significant changes are planned.

Activity #2006-02 Enhanced Project Based Voucher Program
(Includes former activity: #2019-03, Project-Based Voucher Amendments to the HAP Contract)

Plan Year Approved, Implemented, Amended

- Percentage of Voucher Allocation: Approved and implemented FY 2006.
- Floating Units and Per-Building and Per-Project Cap Waiver: Approved and implemented FY 2010.
- Amendments to PB HAP Contracts (waiver of three-year restriction): Approved FY 2015 and implemented FY 2019.
- Amount and Distribution of HCV Homeownership Assistance: Approved and implemented FY 2006.
- Amendments to PB HAP Contracts for Target Populations: Approved FY 2019.
- Waiver of the Independent Entity requirement: Approved in FY 2020 and implemented in FY 2020.
- Definition of a PBV Project: Approved and implemented in FY 2022

Description/Update

HABC operates a PB component under its Housing Choice Voucher Program. Through its PB voucher program, HABC partners with for-profit and nonprofit 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, the non-Bailey LTA PB units and PB units owned directly or indirectly by HABC.

- **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 has waived 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. 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.
- **Independent Entity Requirement:** HABC has waived the requirement for Independent Entities to approve AHAP/HAP Contracts, renewal terms, rent determinations and inspections of HABC owned properties.
- **Definition of a PBV Project:** HABC will define a PBV project as a single building, multiple contiguous or non-contiguous (scattered sites) buildings, or multiple buildings on contiguous or non-contiguous parcels of land all with a single owner. A single-family building is a building with no more than four dwelling units. Additionally, HABC may elect to combine units that cumulatively meet the definition of a PBV project, but that are covered under more than one Housing Assistance Payments (HAP) Contract, into a single HAP Contract. For such scattered site projects, HABC implements an alternative method to determine rent reasonableness whereby HABC bases the rent reasonableness determination for all units in the project that are within the same submarket area on the rent reasonableness determination made for a single unit of each bedroom size. For example, the rent reasonableness determination for all one-bedroom units in the project will be based on the rent reasonableness determination made for a single one-bedroom unit in the project provided that the units are in the same submarket area.

Where HABC may amend PBV HAP contracts executed as a result of awarding vouchers for target populations. The amendment sets forth the following provisions as part of the PBV HAP Contract:

1. Subject to funding availability, owners may obtain applicants directly from the Mayor's Office of Homeless Services (MOHS) or other designated service providers 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 awarded 171 (reserves the right to award up to 192) PBVs for the chronically homeless and 19 (reserves the right to award up to 182) PBVs for veterans.
2. Owners are required 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.

In hardship cases, the tenant, if otherwise eligible, can be relocated to another unit of the appropriate size when one becomes available. The owner will be responsible for relocation costs.

As referenced in Activity 2020-04: Modified Rent Reasonableness and Rent Cap Policy, HABC will utilize the flexibility in this activity to determine rent reasonableness for PBV units and will also apply the flexibility to utilize payment standards up to 135% of FMR when determining initial and re-determined rents for PBV units located in opportunity areas. Finally, the flexibility in Activity 2020-04 regarding rent caps will also apply to rent increases for PBV units.

In FY 2023 HABC anticipates that 348 new PBV units will be placed under AHAP or HAP representing 6 new PBV developments. In total, by the end of FY 2023, HABC anticipates that there will be a total of 3,328 PBV units under AHAP or HAP.

Planned Non-Significant Changes

There are no non-significant changes planned in FY 2023.

Planned Changes to Metrics/Data Collection

Metrics have been updated to reflect updates to the new and existing PBV units.

Metrics

<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 this activity (increase)	Implemented in FY 2019	348		
<i>*Represents the number of new PBV planned in each fiscal year.</i>				
<i>HC #4: Displacement Prevention *</i>				
Unit of Measurement	Baseline **	Benchmark	Outcome	Benchmark Achieved?
Number of households at or below 80% AMI that would lose assistance or need to move	2,652 households	3,328		
<i>*Metric reflects the total number of HABC and BRHP existing and new PBV units.</i>				
<i>** Baseline reflects the existing number of HABC and BRHP managed PBV units as referenced in the FY 2022 Plan.</i>				

<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).	2,652 households	3,328 households		
<p><i>*Metric reflects the total number of HABC and BRHP existing and new PBV units.</i></p> <p><i>**Baseline reflects the existing number of HABC and BRHP managed PBV units as referenced in the FY 2022 Plan.</i></p>				

Planned Significant Changes

No significant changes are planned.

Activity #2006-03: Thompson Biennial Recertifications

Plan Year Approved, Implemented, Amended

Approved FY 2006 and implemented FY 2007.

Description/Update

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. 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. Additionally, the threshold for the age of documents received by BRHP has been extended from 60 days to 120 days.

Planned Non-Significant Changes

No non-significant changes are planned.

Planned Changes to Metrics/Data Collection

- CE #1: Agency Cost Savings: BRHP is removing the metric on agency cost savings as this is not an intended outcome of this activity. While there are time saving features inherent in the Biennial Recertification activity, there are no actual staffing reductions; only repurposing of existing staff.

Metrics

<i>CE #2: Staff Time Savings</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease)	934 hours	3,000 hours 2,000 recerts 1.5 hrs./recert		
<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 percentage (decrease)	5% *This activity was implemented in 2007; however, the data was not tracked until 2015.	5%		
--	---	----	--	--

Planned Significant Changes

No significant changes are planned.

Activity #2006-04: Family Self-Sufficiency Program Enhancements

Plan Year Approved, Implemented, Amended

Approved FY 2006, placed on hold in 2014, reactivated and amended in FY 2020.

Description/Update

HABC has established a combined Public Housing and HCV Family Self Sufficiency (FSS) Program. The FSS Program currently provides services to over 400 Public Housing and Housing Choice Voucher Program families. This MTW FSS program activity provides HABC with greater flexibility in designing an FSS Program that is responsive to the needs of its participating families. Specifically, HABC encourages families to enroll and maintain participation in FSS through the use of goal incentives. These goal incentives award families for reaching interim goals such as completing education and training programs, opening bank accounts and participating in budget and financial management workshops. Other features of the MTW FSS Program include:

- Elimination of mandated thresholds for number of participants in the HCVP program and expansion of the program to include public housing residents;
- Enhanced program design to target the populations in need;
- A focus on outcomes that includes homeownership and unsubsidized economic independence; and
- Revised procedures/regulations regarding the release of the escrow funds.

The FSS program also includes a system of financial incentives for completion of interim goals. Incentive payments will be paid at the completion of the FSS contract of participation and are contingent on the same requirements related to eligibility for release of escrow funds. HABC will retain authority to make interim disbursements in the event that enrollment in the specified activity is contingent upon receipt of the FSS incentive payment. Incentives include the following:

- Obtain an education or vocational certification: \$500 (max of \$1,000)
- Open a bank account with an accredited financial institution within the first year of program participation: \$50
- Complete the budgeting series “Your Money, Your Goals” within the first year of program participation: \$50
- Complete an interim contract goal (other than education/vocation): \$100 (max \$200)

- Complete Career Development Boot Camp within the first year of program participation: \$100

HABC will review the impact of the financial incentives and may modify, add or remove incentives to support the goals of the program and/or to address financial constraints.

Planned Non-Significant Changes

There are no non-significant changes planned for FY 2023.

Planned Changes to Metrics/Data Collection

Benchmarks have been updated to reflect anticipated outcomes for FY 2023.

Metrics

<i>SS #1: Increase in Household Income*</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average earned income of households affected by this policy in dollars (increase)	\$13,908	\$14,554		
<i>*Baseline represents average earned income for households with earned income in FY 2019. Benchmark indicates an increase of 2.3% growth.</i>				
<i>SS #2: Increase in Household Savings*</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average amount of escrow of households affected by this policy in dollars (increase)	\$4,099	\$4,289		
<i>*Baseline reflects average escrow for households with escrow at the end of FY 2019.</i>				
<i>SS #3: Increase in Positive Outcomes in Employment Status*</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Unemployed	202	202 56%		
Employed PT or FT	164	158 44%		
Enrolled in Education	10	11 3%		
Enrolled in Job Training	30	29 8%		
<i>*Baseline reflects households enrolled in FSS during FY 2019.</i>				

SS #4: Households Removed from Temporary Assistance for Needy Families (TANF)*				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households receiving TANF assistance (decrease)	34	32 9%		
<i>*Baseline represents FSS households receiving TANF benefits at the end of FY 2019.</i>				
SS #5: Households Assisted by Services that Increase Self-Sufficiency				
Unit of Measurement	Baseline*	Benchmark	Outcome	Benchmark Achieved?
Number of households receiving services aimed to increase self-sufficiency (increase)	0	360		
<i>*Baselines were established in FY 2020 report.</i>				
SS #7: Increase in Agency Rental Revenue*				
Unit of Measurement	Baseline **	Benchmark	Outcome	Benchmark Achieved?
Total Household contributions towards housing assistance (increase)	\$280	\$280		
<i>*Represents Tenant Rent to Owner. **Baselines were established in FY 2020 report.</i>				
SS #8: Households Transitioned to Self Sufficiency*				
Unit of Measurement	Baseline**	Benchmark	Outcome	Benchmark Achieved?
Number of households transitioned to self-sufficiency (increase)	0	17		
<i>*Self-sufficiency is defined as graduation from the FSS program.</i>				

Planned Significant Changes

No significant changes are planned.

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

Plan Year Approved, Implemented, Amended

- Exception Payment Standards: Approved and implemented FY 2007.
- Security Deposit Assistance: Approved and implemented FY 2022.
- Incentive Payments to Landlords: Approved FY 2019 and implemented FY 2022.

Description/Update

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.

BRHP also provides 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.

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.

Planned Non-Significant Changes

No non-significant changes are planned.

Planned Changes to Metrics/Data Collection

Metrics have been updated to reflect anticipated volumes in FY 2023.

Metrics

<i>HC #5: Increase in Resident Mobility – Payment Standards & Security Deposit</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)	Payment Standards: 0 Security Deposit Assistance: 300	Payment Standards: 450 families who move to exception PS areas Security Deposit Assistance: 170		
<i>HC #7: Households Assisted by Services that Increase Housing Choice – Security Deposit</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households receiving services aimed to increase housing choice (increase)	300	170 Security Deposit Assistance		

Planned Significant Changes

No significant changes are planned.

Activity #2009-01: MTW Homeownership Program Combined with 2021-02 Special Homeownership Vouchers

Plan Year Approved, Implemented, Amended

For the FY 2022 Plan, HABC has combined approved MTW Activities #2009-01 (MTW Homeownership Program) and #2021-02 (Special Homeownership Vouchers) into a single activity as they are interrelated components of HABC's MTW Homeownership Program.

- Activity #2009-01 which established the MTW Scattered Site Homeownership Program was approved in FY 2009, placed on hold in FY 2014, and reactivated and amended in FY 2020 and FY 2021. Original implementation was 2009.
- Activity #2021-02 was approved and implemented in FY 2021.

Description/Update

Under the MTW Homeownership Program, HABC works with public housing residents, HCV participants and other eligible low-income households to prepare for first time homeownership and to purchase HABC scattered site public housing units. The goals of the MTW Homeownership Program include increasing affordable first-time homeownership by eligible low-income families; repurposing and rehabilitating HABC's vacant scattered site public housing units; and supporting and leveraging the revitalization of Baltimore's neighborhoods. The MTW Homeownership Program has evolved since initial approval and includes the following key program features:

Eligible Purchasers – Eligible purchasers include public housing residents, HCV Program voucher holders, and applicants on the public housing and/or HCV waiting lists. HABC will establish priority tiers that identify the priority order of selection and may establish a waiting list including selection criteria if needed based on demand.

Eligible Properties – HABC scattered site properties are eligible for purchase under this program. The determination of which properties are eligible for homeownership will be made solely by HABC based on its assessment of the best interests of the community and the agency.

Property Feasibility – HABC limits the scope of repairs and renovations of units disposed of directly by HABC to eligible purchasers to \$75,000 per unit, which may be increased by HABC to accommodate renovations related to disability accessibility or rehabilitation of properties within

historic districts. Notwithstanding this limit, the rehabilitation costs cannot be more than 1/3 of the appraised value after rehab.

Second Mortgages – Subject to funding availability, HABC may offer non-cash, non-interest bearing second mortgages to eligible homebuyers up to 25% of the after-rehab appraised value of the property, which may be increased to up to 50% on a case-by-case basis or in extenuating circumstances. HABC second mortgage assistance may be made only after eligible homebuyers have obtained a first mortgage commitment to the fullest extent that their incomes allow. HABC requires that second mortgages be paid back in full during or after the first mortgage has been paid in full, if the property or any part of the land thereof is refinanced, or if ownership is transferred or sold.

Closing Costs – HABC may match closing costs up to \$5,000 to be applied at closing. All closing costs will be based on need and only apply after required personal contribution, government and/or lender assistance have been applied.

Recapture Provisions and Deed Restrictions – HABC requires recapture of portions of the appreciation during the first 10 years after sale as follows: 1) First 5 years – 50% of appreciation; 2) Years 6-10 – 25% of appreciation; 3) Year 11 and beyond – no recapture of appreciation.

Purchase and Resale Entities (PRE) – HABC allows for disposition of vacant scattered sites to PREs, subject to HUD disposition approval, in accordance with 24 CFR 906. PREs are community partners with the legal and administrative capacity to carry out homeownership and resale activities. HABC enters into a written agreement with each designated PRE including the following requirements: 1) Resales must be to residents of conventional public housing; 2) HABC will market the program and refer eligible residents to the PRE, in accordance with mutually agreed upon selection criteria including, but not limited to, residents must be in good standing with HABC and have the financial capacity needed to support homeownership costs; 3) and, eligible residents will pay a non-refundable property reservation fee of up to \$1,000 to the PRE, which shall be applied towards buyer's out-of-pocket expenses associated with the purchase.

Decelerated Assistance: To ease the transition from subsidized homeownership assistance, HABC implements a schedule of decelerated assistance for an additional five years at the end of the family's applicable HCV Homeownership assistance term. Decelerated assistance is available to participants in with HCV Homeownership Vouchers as well as participants with Special Homeownership Vouchers. The decelerated assistance schedule is as follows:

- Participant pays 30% of their monthly household income plus:
- Year 1: 50% of the balance of the mortgage payment;
- Year 2: 60% of the balance of the mortgage payment;

- Year 3: 70% of the balance of the mortgage payment; and
- Year 4: 80% of the balance of the mortgage payment.

Special Homeownership Vouchers

As part of the MTW Homeownership Program, HABC utilizes MTW flexibility to create and fund a limited number of Special Homeownership Vouchers (SHV) for use by eligible low-income households who purchase a scattered site unit, including existing HCV and Public Housing families and families on the Public Housing and HCV waiting lists. SHVs differ from regular Housing Choice Voucher (HCV) Program vouchers in the following respects:

Eligibility – Eligibility for SHVs is limited to low-income households participating in and meeting the income and other criteria of HABC’s MTW Homeownership Program who purchase a scattered site unit from HABC or its authorized Purchase and Resale Entities. Households receiving an SHV are not eligible for a second mortgage through the MTW Homeownership Program.

Eligible Units – SHVs may be used in conjunction with the purchase of an HABC scattered site unit offered through HABC’s MTW Homeownership Program. The determination of which properties are eligible for homeownership will be made solely by HABC based on its assessment of the best interests of the community and the agency and may include: units sold by Presale Resale Entities, homeownership development projects where HABC requires a certain number of units be set aside for residents and rehabilitated properties or new construction built on lots previously owned by HABC where HABC requires a certain number of units be set aside for residents

Portability and Moves – SHVs are not portable and cannot be used to move to another homeownership or rental unit. The SHV assistance will end if the originally purchased scattered site unit or any related parcel of land is sold, or if changes are made to the deed that includes a third party not listed as a family member on the voucher. Subject to continued eligibility, SHV participants whose homeownership assistance has terminated may be eligible to transfer to an available public housing unit.

Utility Allowances – SHV participants are not eligible for utility allowances.

Housing Assistance Payments – SHV participants are required to pay at least 30% of adjusted household income as family share (total tenant payment) towards monthly homeownership costs. SHV assistance is applied to the first mortgage payment balance after factoring in the family share. To promote affordability of first time buying among very low-income households, HABC may pay the higher of the applicable HCV voucher payment standard or total monthly homeownership expenses, less the family share.

The decelerated assistance portion of the MTW Homeownership program, which was previously approved for Homeownership Voucher holders, will also be available to participants with Special Homeownership Vouchers.

Planned Non-Significant Changes

In FY 2023, HABC will add the following changes to its MTW Homeownership Program:

- So that HABC can better ensure that homeownership opportunities are made available to a broad array of households and that households will have success in the homeownership program, HABC will modify the minimum income requirement for non-disabled, elderly households and households where the only source of income is from a pension. Specifically, these households will be required to have annual incomes equal to or greater than the Federal SSI benefit for an individual living alone (or paying his or her share of food and housing costs) multiplied by twelve.
- HABC may consider providing Special Homeownership Vouchers to eligible, existing Public Housing families or Public Housing families on the waiting list who purchase homes on the general market. This change effectively allows Public Housing families with the opportunity to choose and purchase an eligible home under the Homeownership program which is outside of HABC's scattered site inventory.
- Special Homeownership Vouchers may also be used for units developed in partnership with a developer and HABC that require a certain number of set-aside units for families in HABC's Homeownership program.
- Down-Payment/Closing Cost Assistance –Subject to funding availability, HABC may offer a one-time down-payment or closing cost assistance up to \$10,000 for eligible Public Housing first time homebuyers in HABC's MTW Homeownership program. Families will be required to attend homeownership counseling and provide counseling certificates from one of the HABC approved HUD certified Housing Counseling Agencies. The property purchased must be in Baltimore City/County and the property must pass a lead test and Housing Quality Standard (HQS) inspection. HABC will establish a criteria and guidelines to determine the amount awarded. HABC will not require the funds to be refunded unless the family is unable to obtain a mortgage to purchase a home in Baltimore City/County that meets the program eligibility requirements, or the family fails to submit required program documentation. The down payment/closing cost assistance will be granted at the time of settlement and paid directly to the title company. Funding

is to be applied directly as down payment or applied to the closing cost. Excess funds will be required to applied as a principal curtailment or returned to the Housing Authority of Baltimore City. Currently, participants of the Special Homeownership Voucher or the Housing Choice Homeownership Voucher are not eligible to participate.

Planned Changes to Metrics/Data Collection

Metrics have been updated to reflect the anticipated volume of homeownership transactions in FY 2022.

Metrics

<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% of AMI as a result of the activity (increase)	0	12		
<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)	0	10		
<i>HC #6: Increase in Homeownership Opportunities</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households that purchased a home as a result of the activity (increase)	0	22		

Planned Significant Changes

No significant changes are planned.

Activity #2010-01: Unit Sizes

Plan Year Approved, Implemented, Amended

Approved and implemented FY 2010.

Description/Update

Under this initiative, HABC requires participating HCVP families to select a unit size consistent with and not greater than the unit size listed on their voucher. This policy applies to all new admissions and moves. HABC does not require households who are in an existing unit and experience a decrease in family size to move. However, the payment standard will be adjusted to reflect (1) the lower of the actual unit size or (2) authorized voucher size for families who are over-housed at their next recertification.

HABC will grant reasonable accommodations and may waive the requirement in cases where a household has exhausted all housing search efforts and is unable to locate a unit not greater than the unit size listed on their voucher. Exceptions to this rule may be granted as a reasonable accommodation.

Planned Non-Significant Changes

No non-significant changes are planned.

Planned Changes to Metrics/Data Collection

No changes are planned for metrics.

Metrics

<i>CE #1: Agency Cost Savings*</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease)	\$142,007,010	\$139,982,010		
<i>*Represents total HAP expenditures</i>				

Planned Significant Changes

No significant changes are planned.

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

Plan Year Approved, Implemented, Amended

Approved and implemented FY 2010.

Description/Update

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 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.

By the end of FY 2023 there will be 286 LTA NED units. Each of these units, upon completion, will provide much needed affordable units for persons with disabilities. HABC does not anticipate adding new units under this activity in FY 2023.

Planned Non-Significant Changes

No non-significant changes are planned.

Planned Changes to Metrics/Data Collection

The benchmark has been updated to reflect corrections to the number of Bailey LTA units under contract.

<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 as a result of the activity (increase)	0 units	286		

Planned Significant Changes

No significant changes are planned.

Activity #2010-03: Thompson Risk Based Inspections

Plan Year Approved, Implemented, Amended

Approved and implemented FY 2010.

Description/Update

Pursuant to HABC's MTW authority, units in the BRHP Program are 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 requires 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.

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

Planned Non-Significant Changes

No non-significant changes are planned.

Planned Changes to Metrics/Data Collection

- CE #1: Agency Cost Savings: HABC is removing the metric on agency cost savings as this is not an intended outcome of this activity. While there are time saving features inherent in the Risk-Based Inspections activity, there are no actual staffing reductions; only repurposing of existing staff.

Metrics have been updated to reflect anticipated inspection volumes in FY 2023.

Metrics

<i>CE #2: Staff Time Savings</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?

Total time to complete the task in staff hours (decrease)	1,869 hours	Inspections completed: 2,150 Staff time per inspection: 1.5 Total time savings Hours: 3,225		
---	-------------	--	--	--

Planned Significant Changes

No significant changes are planned.

Activity #2012-01: Rent Simplification – Thompson *(Formerly Asset Income, Adjusted Income and FT Student Adoption Assistance Exclusion for Thompson Participants)*

Plan Year Approved, Implemented, Amended

- Adjusted Income and Asset Income: Approved and implemented FY 2012.
- FT Student and Adoption Assistance Exclusion: Approved and implemented FY 2014.
- Asset & Seasonal Income Calculation: Approved and implemented in FY 2020.

Description/Update

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 is reduced using the standard deductions outlined below. There will be a standard deduction for working families, elderly 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 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, BRHP allows self-certification of asset value and income.
- **Asset Income Calculation:** BRHP calculates asset income by taking the market/face value of the family's assets and multiplying that value by the established passbook savings rate when the market/face value of the family's assets is in excess of \$50,000.

- BRHP calculates seasonal income using the past four quarters of income as reported by Enterprise Income Verification’s (EIV) Income Report, tax returns or other applicable third-party methods of verification. Income may also include off-season employment and/or unemployment.
- BRHP’s hardship policy is extended so that families may request the use of regulatory deductions and exclusions if adjusted income would be lower than adjusted income calculated using BRHP standard deductions. The request must be made within 14 calendar days of the notification of the change in family rent share. HABC will apply its financial hardship policies to households who demonstrate hardship due to application of these policies.

Planned Non-Significant Changes

In FY 2023, to improve housing choice and administrative efficiency, when the payment standard goes down between the date the RFTA is submitted and the lease effective date, BRHP will apply the higher payment standard in effect when the RFTA was submitted. This policy will apply to leasing for new admissions and moves. Additionally, BRHP updates the voucher size and payment standard at the certification when family composition changes are reported.

Planned Changes to Metrics/Data Collection

There are no planned changes to metrics.

Metrics

<i>CE #2: Staff Time Savings</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease)	Asset Income: 935 hours Adjusted Income: 935 hours FT Student and Adoption Assistance	Asset Income: 0 hours Adjusted Income: 1,125 hours FT Student and Adoption Assistance		

	Exclusion: 21 hours	Exclusion: 0 hours		
CE #5: Increase in Agency Rental Revenue*				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total household contributions towards housing assistance (increase)	\$470	\$470		
<i>* Baseline and Benchmark first established in FY 2019. HABC uses average TTP for this metric.</i>				

Planned Significant Changes

No significant changes are planned.

Activity #2014-01: HABC Long-Term Affordable Project-Based Voucher Contract

Plan Year Approved, Implemented, Amended

Approved and implemented FY 2014.

Description/Update

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 are 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 provides 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

HABC will use the flexibility under this activity when entering into LTA-PB contracts related to the PSO Transformation Plan.

Currently, two PBV contracts include LTA units, O’Donnell Heights which includes 23 units and 1234 McElderry which includes 40 LTA units bringing the total PBV LTA units to 63. No new PBV LTA units are planned for FY 2023.

Planned Non-Significant Changes

There are no non-significant changes planned.

Planned Changes to Metrics/Data Collection

There are no changes to metrics for FY 2023.

Metrics

<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)	0 households	63		

Planned Significant Changes

No significant changes are planned.

Activity #2019-01: Rent Simplification

Plan Year Approved, Implemented, Amended

Approved FY 2019; planned implementation end of 3rd quarter 2019, Amended FY 2020.

Description/Update

The Rent Simplification activity is implemented in both the Public Housing and Housing Choice Voucher programs and includes the following:

- *Exclusion of all FT Student Earned Income* – Under Rent Simplification, HABC excludes 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 only 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 established \$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 excludes 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.
- *Medical Expense Calculation Method* – HABC calculates medical expenses for eligible participants using past paid, unreimbursed expenses in addition to prospective medical insurance premiums. Over the counter medications will not qualify for a deduction unless accompanied by a prescription and paid receipts. This change will alleviate the need to try to determine anticipated medical procedures and expenses, which cannot be accurately forecasted; however, there is no change to the amount and type of medical expenses which can be deducted.

- *Seasonal Income Calculation Method* – HABC calculates seasonal income using the past four quarters of income as reported by the Enterprise Income Verification’s (EIV) Income Report, tax returns or other applicable third-party methods of verification. Income may also include off-season employment and/or unemployment; and
- *Payment Standards:* HABC’s payment standards policy allows HABC to apply payment standards outside of the regulatory range to support leasing in revitalized areas and opportunity neighborhoods. As such, HABC applies the payment standard in effect on the effective date of the regular recertification regardless of fluctuations in payment standards from year to year. This change greatly reduces the administrative burden and error rates in the application of payment standards when and if there is a decrease in payment standards. HABC will review hardships on a case-by-case basis when and if the application of the current payment standard results in a rent increase of more than 6%.
- *Guaranteed Income Exclusion:* HABC excludes 100% of income received from HABC reviewed and approved guaranteed income programs which is paid to support financial stability and economic equality. This income is temporary and thus excluded.

Planned Changes to Metrics/Data Collection

Metrics have been updated to reflect anticipated volume in FY 2023.

Metrics

<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)	Number of Adult FT Students with Earned Income & Households with Assets: 1,563 Time per FT Student and Household with Assets – Verification & Calculation: .5 hours Total Time Spent on Activity Prior to Implementation 781.5 hours	Number of Adult FT Students with Earned Income & Households with Assets: 857 Time per FT Student and Household with Assets – Verification & Calculation: .25 hours Total Time Spent on Activity after implementation		

		214 hours		
--	--	-----------	--	--

Planned Significant Changes

No significant changes are planned.

Activity #2019-02: Local Fair Market Rent

Plan Year Approved, Implemented, Amended

Approved FY 2019; implemented FY 2020.

Description/Update

This activity was implemented for both HABC's Leased Housing Program and the Baltimore Housing Mobility Program operated by the BRHP and remains subject to funding availability. 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 establish 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 FY 2009 MTW Annual Plan. Subsequently, HUD approved 50th percentile FMRs for the metropolitan Baltimore area at which time HABC removed this activity. With the advent of SAFMRs, the 50th percentile FMR for Baltimore was removed and the activity was re-proposed.

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 FY 2009. Therefore, continuation of this policy will not change existing rent policies and will not result in hardships to voucher holders.

Planned Non-Significant Changes

No non-significant changes are planned.

Planned Changes to Metrics/Data Collection

As all BRHP households benefit from the 50th percentile FMR, BRHP has modified this metric to reflect all assisted households.

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	4,321		
<i>*Represents BRHP assisted households only. Leased Housing families are not part of Mobility program services but are able to access the 50% percentile FMR.</i>				
<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	4,321		
<i>*Represents BRHP assisted households only. Leased Housing families are not part of Mobility program services, but are able to access the 50% percentile FMR</i>				

Planned Significant Changes

No significant changes are planned.

Activity #2020-01: Housing Quality Standards (HQS) Modifications & Enhancements

Plan Year Approved, Implemented, Amended

Approved FY 2020 and implemented FY 2021.

Description/Update

HABC uses its MTW authority to modify the provision set forth in PIH Notice 2016-05 Streamlining Administrative Regulations for Programs Administered by Public Housing Agencies as it relates to HQS reinspection fees. It is burdensome and costly for HABC to inspect units multiple times. Additionally, HABC wishes to be mindful that program features do not serve to deter owner participation in its Voucher program. Accordingly, HABC will establish a \$75 fee to owners for reinspection. From time to time, HABC may review and modify the reinspection fee to reflect changes in the cost of re-inspections. Outlined below are the circumstances under which reinspection fees will be charged. This activity applies to the tenant-based and project-based programs.

1. An owner notifies HABC that a deficiency cited in previous re-inspection has been repaired or the allotted time for repairs has elapsed and under either circumstance the previously cited deficiency(ies) has/have not been corrected. Under this circumstance, HABC will require the owner to pay a reinspection fee prior to conducting a second reinspection. An example of this provisions is as follows:
 - A unit fails its regular inspection on March 5: No inspection fee.
 - A reinspection on April 4 reveals that the previously cited deficiencies have not been corrected: No inspection fee; however, HAP is abated.
 - On April 30, the owner notifies HABC that the previously cited deficiencies have been corrected. Prior to HABC conducting a second reinspection, HABC will charge, and the owner must pay, a reinspection fee.
 - Reinspection fees will be charged for each additional reinspection until the unit receives a pass rating.
2. For a unit not currently under HAP contract and where an HQS inspection has been scheduled, HABC will charge the owner for a reinspection if the unit is not ready for

inspection, e.g. plumbing fixtures or appliances are not connected, the unit is under construction, disconnected or illegal utilities, excessive violations or the owner fails to provide access to the unit.

3. For a unit not currently under HAP contract, HABC will provide owners with a self-inspection checklist as part of the Request for Tenancy Approval (RFTA). The checklist will include guidance that upon inspection by HABC, if the unit fails inspection, HABC will schedule a reinspection. There will be no fee for the first reinspection. If the unit fails at the first reinspection, HABC will charge the owner a reinspection fee for the second reinspection if the family wishes to continue the process of leasing that unit. The reinspection fee must be paid in full prior to HABC conducting a second reinspection of the unit.

It is important to note that owners will be charged a fee for repeated RFTA submissions for the same unit if that unit has failed an inspection within the prior 60 days. If there have been no inspections within the last 60 days, the RFTA will be treated as new, and the inspection process will start over as an initial inspection.

The reinspection fee will not apply to:

- Deficiencies caused by the participant family;
- An instance in which an inspector was unable to gain access to a unit currently under HAP contract; or,
- New deficiencies identified during a reinspection. If new deficiencies are uncovered during reinspection, HABC will follow established procedures to address these newly identified deficiencies

Planned Non-Significant Changes

No non-significant changes are planned.

Planned Changes to Metrics/Data Collection

Metrics have been updated to reflect anticipated outcomes in FY 2023.

Metrics

<i>CE #1: Agency Cost Savings</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?

Total cost of task in dollars (decrease)	\$197,276 Total cost first initial inspection fails and second regular reinspection fails: Number of first initial inspection fails + second regular reinspection fails: 6,069 Time per inspection: 1.65 Hours 6,069 * 1.65 10,014 hours 10,014 hours x \$19.70 = \$197,276	\$162,102 Total cost first initial inspection fails and second regular reinspection fails: Number of first initial inspection fails + second regular reinspection fails: 2,119 + 2,868 = 4,987 Time per inspection: 1.65 Hours 4,987 x 1.65 = 8,229 hours 8,229 hours x \$19.70/hour = \$162,111		
CE #2: Staff Time Savings				
Unit of Measurement	Baseline	Benchmark*	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease)	Number of first initial inspection fails + second regular reinspection fails: 6,069 Total first inspection time: 6,069 * 1.65 hours per inspection= 10,014 hours	Number of first initial inspection fails + second regular reinspection fails: 2,119 + 2,868 = 4,987 Time per inspection: 1.65 Hours 4,987 x 1.65 = 8,229 hours		
<i>*HABC anticipates that implementation of a reinspection fee may result in a reduction in the number of re-inspections.</i>				

Planned Significant Changes

No significant changes are planned.

Activity #2020-02: The Healthy Opportunities Program

Plan Year Approved, Implemented, Amended

Approved FY 2020; Implemented: FY 2022.

Description/Update

HABC has partnered with the Baltimore City Health Department and other local organizations to implement the Healthy Opportunities Program (HOP). The initiative is a mobility program designed around the collaboration between housing and health-care providers, who work together to provide stable, affordable and healthy housing in opportunity areas to ultimately improve participants' health outcomes and overall quality of life. HABC works with its partners to identify existing HCV families with children in which one or more family members has a medical condition, such as asthma, that is exacerbated by environmental factors.

Participating families are provided mobility counseling, which includes assistance in identifying a healthy environment based on participant needs. Participants may also be provided incentives to move within opportunity areas, such as higher payment standards and security deposit/first month's rent assistance. HOP will assist no more than 150 families at any given time. Support and counseling is provided to families during the housing search and up to 12 months after the effective date of the move. Upon successful completion of the program, HOP families will maintain their HCV, as long as they remain in compliance with program rules and regulations. HABC will evaluate the results of the program and may select new HOP participants upon turnover.

Only participants who complete mobility counseling and move to an opportunity area will be eligible for the higher payment standard and/or security deposit/first month's rent assistance. Standard MTW policies and applicable regulatory requirements will apply to participants of the program. Finally, HABC may identify additional partner agencies as program needs dictate.

HABC, in concert with its program partners, implemented the HOP program in the latter part of FY 2022, including providing mobility counseling and supportive services. In FY 2023 HABC will continue to identify and enroll participants in the HOP.

Planned Non-Significant Changes

No non-significant changes are planned.

Planned Changes to Metrics/Data Collection

There are no planned changes to metrics

Metrics

<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)	0	50		
<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)	0	50		

Planned Significant Changes

No significant changes are planned

Activity #2020-03: Local Forms

Plan Year Approved, Implemented, Amended

Approved FY 2020; implemented FY 2021

Description/Update

Under this initiative, HABC creates local versions of forms, as needed, to streamline processing, utilize “plain language”, address MTW policies and address local housing market features. HABC plans to develop local versions of the Project-Based Voucher (PBV) Housing Assistance Payment (HAP) contract, the Tenant Based HAP Contract and related HAP contract Tenancy Addendums and the Privacy Act Notice. Where the Privacy Act Notice is concerned, HABC will extend the expiration from 15 months to 39 months to accommodate the biennial and triennial recertification cycles. Any changes to the HAP form will be submitted to HUD for review and will include language noting that funding for the contract is subject to the availability of appropriations and other required provisions identified by HUD. Development of any local form will meet all applicable HUD requirements.

Planned Non-Significant Changes

No non-significant changes are planned

Planned Changes to Metrics/Data Collection

Metrics have been updated to reflect anticipated outcomes in FY 2023.

Metrics

<i>CE #2: Staff Time Savings</i>				
Unit of Measurement	Baseline	Benchmark *	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease)	7,307 hours .5 hours per form x 14,613 HCV participants	3,726 hours .25 hours per form x 14,905 HCV participants		

** Reflects the total number of planned HCV households*

Activity #2020-04: Modified Rent Reasonableness & Rent Cap Policy (Formerly Modified Rent Reasonableness Policy)

Plan Year Approved, Implemented, Amended

Approved FY 2020; implemented FY 2021; amended FY 2021.

Description/Update

HABC utilizes a modified rent reasonableness policy to reflect market conditions and streamline the process for determining reasonable rent. HABC engaged an independent consultant to conduct a housing market analysis which reflected the following:

- Identified submarkets within the City of Baltimore using factors such as poverty and crime rates, school quality, employment opportunities, access to transportation and income statistics. In establishing submarkets, areas of poverty and opportunity were also identified based on the factors above;
- Included collection of data on verified rents for unassisted units, by bedroom size, for each identified submarket; and,
- Established rent ranges based on data collected, which include a low rent, high rent and average rent by bedroom size by the identified submarket.

HABC utilizes the rent ranges, by submarket and by bedroom size, to determine rent reasonableness and adjusts the rent ranges to reflect market conditions in its jurisdiction. Additionally, when market conditions reflect a change of 10% or more from the existing rent ranges, HABC will determine if an updated market analysis is needed.

HABC conducts QC reasonable rent (RR) determinations on a random sample of new units and units with rent increases. HABC conducts these RR determinations using the regulatory reasonable rent methodology; however, HABC will use the SEMAP sample size requirements to dictate the number of RR determinations to be completed using a universe of new units and rent increases to dictate the sample size. If the approved rent on more than 20% of sampled units, because of application of the MTW rent range policy, is not reasonable when compared with the QC RR determination, HABC will conduct QC RR determinations on double the initially established sample size. HABC will monitor outcomes and may modify this policy to ensure rents are reasonable.

Additionally, depending on the applicable rent ranges in opportunity submarkets, HABC may increase the payment standards for opportunity submarkets to an amount no greater than 135% of FMR; however, this ceiling may be adjusted from time to time to reflect market rents in the opportunity areas.

The rent range by sub-market and payment standards up to 135% of FMR applies to units leased in the Tenant-Based and Project-Based programs. HABC may also apply payment standard caps when and if funding restrictions arise.

Rent Cap Policy (Rent Increases Only)

Under this activity HABC may place a cap on contract rent increases for assisted Tenant-Based and Project-Based units. The established cap will reflect market conditions and is anticipated to be up to 5% in FY 2023. The application of the rent cap will be dependent on market conditions and will be subject to a reasonable rent determination.

Planned Non-Significant Changes

There are no non-significant changes planned.

Planned Changes to Metrics/Data Collection

Metrics

<i>CE #2: Staff Time Savings</i>				
Unit of Measurement	Baseline*	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease)	Time to determine rent reasonableness: .5 Number of rent requests, new admissions and moves: 3,749* Total Time: 1,875 hours	Time to determine rent reasonableness: .25 Number of rent requests, new admissions and moves: 3,652 Total Time: 913 hours		

Planned Significant Changes

No significant changes are planned

Activity #2020-05: The Bailey 10 Total Development Cost Limit Policy

Plan Year Approved, Implemented, Amended

Approved FY 2020 and implemented FY 2020.

Description/Update

The Bailey Consent Decree as amended by the Bailey Supplemental Consent Decree in 2015, requires that HABC produce ten, one-bedroom units (“Bailey 10”) for non-elderly persons with disabilities through the acquisition of units in designated areas of opportunity in Baltimore City that meet certain required neighborhood characteristics. Many of these requirements are consistent with the criteria for the acquisition and rehabilitation of units for the Hollander Ridge Scattered Site Project (“Hollander Ridge”).

HABC submitted its development proposal for the Bailey 10 to HUD by letter dated April 2, 2018, which was approved by HUD in a letter dated April 23, 2018. The development budget submitted to HUD included an average acquisition and rehab cost estimate of \$157,000 per unit. Associated soft costs added another \$23,000 per unit resulting in a total per unit TDC of \$180,043.

Subsequent to HUD approval of the development proposal, HABC discovered that the acquisition and rehabilitation costs would likely exceed the proposed costs set forth in the initial budget and, in some cases, exceed the HUD TDC. HABC requested and received approval in the FY 2022 MTW Plan to make the following changes to this activity.

1. Allow HABC to pay over the appraised amount by up to 10% in order to compete with buyers who are able to meet seller’s contractual term requirements at lower amounts. This waiver would authorize HABC to pay over appraised value without having to seek HUD approval for each transaction.
2. Increase the TDC limit for the Bailey units up to 50% over HUD’s current approved TDC limit of \$247,035.

The current real estate market and rising construction costs continue to make successful acquisitions even more difficult as purchasers are offering above asking and often, above appraised values. As of the writing date of this Plan HABC has completed three of the ten Bailey units. In FY 2023, HABC will continue to vet listings and search for units that are within the established TDC thresholds. This may result in longer than anticipated timelines for completion of the remaining ten units.

Planned Non-Significant Changes

There are no non-significant changes planned in FY 2023.

Planned Changes to Metrics/Data Collection

HABC has updated the benchmarks to reflect the total units planned for this activity. Each report will include the total number of units completed toward that goal since activity inception.

Metrics

<i>HC #1: Additional Units of Housing Made Available</i>				
<i>Unit of Measurement</i>	<i>Baseline</i>	<i>Benchmark</i>	<i>Outcome</i>	<i>Benchmark Achieved?</i>
Number of new housing units made available for households at or below 80% AMI as a result of this activity (increase)	0	10		
<i>HC #5: Increase in Resident Mobility</i>				
<i>Unit of Measurement</i>	<i>Baseline</i>	<i>Benchmark</i>	<i>Outcome</i>	<i>Benchmark Achieved?</i>
Number of households able to move to a better unit and/or neighborhood of opportunity as a result of the activity (increase)	0	10		

Planned Significant Changes

No significant changes are planned.

Activity #2021-01: Emergency Waivers

Plan Year Approved, Implemented, Amended

Approved FY 2021 and implemented FY 2021.

Description/Update

The COVID-19 outbreak threatens the lives of many Americans and the livelihoods of many more. It is an urgent health crisis of unprecedented scale, and one that is disproportionately impacting low-income families. The outbreak of COVID-19 also places additional burdens on housing authorities who are working tirelessly to respond to the needs of their participants while also maintaining compliance with program requirements. While the Coronavirus Aid, Relief and Economic Security (CARES) Act provides the U.S. Department of Housing and Urban Development (HUD) with broad authority to waive or establish alternative requirements for numerous statutory and regulatory requirements for the Public Housing program and Housing Choice Voucher (HCV) programs, the duration of this pandemic remains unknown and the backlog of transactions, inspections and delayed reporting requirements grows. Accordingly, HABC will use its MTW authority to establish an emergency waivers activity which addresses the burdens placed on all stakeholders. HABC may establish the following emergency waivers in response to economic and health related emergencies and natural disasters as declared by the Mayor or his/her designee, including the authority to determine when to place and lift the waivers. HABC may revise, add and/or remove waivers as needed to address emergency related conditions.

- 1. Delayed Reexaminations:** HABC will waive the requirement to conduct a reexamination of family income and composition at least annually. Currently HABC completes reexaminations on a biennial basis for Public Housing (PH) and Housing Choice Voucher (HCV) program households and on a triennial basis for PH households on ceiling rents and PH and HCV elderly/disabled households on fixed incomes. Where reexaminations have been delayed, HABC will complete the reexamination no later than the anniversary month of the following year. The next reexamination will be scheduled on the same anniversary month using the applicable reexam frequency for the family. For example, if a biennial reexam was due on July 2020, HABC would complete the reexam by July 2021. The next scheduled biennial reexam would take place in July 2023. This waiver applies to the PH and HCV programs.

- 2. Verification of Income:** During periods of declared emergencies, HABC will waive the requirements of the verification hierarchy, but continue to use EIV to confirm income at interim and regular recertification.
- 3. Increase in Payment Standard:** HABC will waive the requirement to apply the increased payment standard back to the regular effective date for delayed regular reexaminations. Instead, during periods of declared emergencies, HABC will apply the increased payment standard at the next interim reexamination after the effective date of the increased payment standard. If HABC completes a reexam late, HABC will apply the payment standard in effect on the effective date of the delayed regular reexamination. This waiver applies to the HCV program.
- 4. Delayed Regular HQS Inspections:** HABC will waive the requirement for completion of regular HQS inspections at least biennially. Where a regular HQS inspection has been delayed, HABC will complete the HQS inspection no later than the anniversary month of the following year. The next HQS inspection will be scheduled on the same anniversary month using the applicable inspection frequency for the unit. For example, if an HQS inspection was due on July 2020, HABC would complete the inspection by July 2021. The next scheduled annual HQS inspection would take place in July 2022. HABC will continue to request a self-certification from the owner that no life-threatening conditions exist in the unit. Additionally, HABC will continue to conduct complaint inspections. This waiver applies to the HCV program.
- 5. Interim HQS Inspections:** HABC will waive the requirement to conduct re-inspections to confirm repair; however, HABC will require that the owner self-certify and provide documentation that a life-threatening deficiency has been corrected within 24 hours of notification or HABC will conduct a remote video conference within 24 hours to confirm repair. HABC will accept an owner self-certification that non-life-threatening deficiencies have been corrected within 30 days of HABC notification. This waiver applies to the HCV program.
- 6. HQS QC Inspections:** HABC will waive the requirement to conduct HQS quality control inspections and instead will suspend HQS quality control inspections until the emergency waiver has been lifted. This waiver applies to the HCV program.

- 7. **Homeownership HQS:** HABC will waive the requirement for the initial HQS inspection for homeownership units; however, an independent professional inspection will still be required. This waiver applies to the HCV Homeownership Program.
- 8. **Delayed PH Annual Self-Inspection:** HABC will waive the requirement to complete annual self-inspections of PH units. HABC will continue to respond to and address serious conditions that could jeopardize life or property. When the waiver is lifted, HABC will resume self-inspections beginning with the units which were inspected on the oldest date. This waiver applies to the PH program.
- 9. **FSS Contract of Participation:** HABC will waive the requirement regarding the maximum extension of an FSS Contract of Participation (COP). During periods of declared emergency, HABC may extend a family’s COP, using the declared emergency as good cause of the need for extension. For households who were already in the two-year extension period when the emergency was declared, HABC may extend their COP beyond the two-year extension threshold. This waiver applies to the PH and HCV FSS program.

In FY 2023, HABC will honor the timelines in this activity and complete transactions which may have been delayed as a result of the emergency waivers. In the event of another declared state of emergency, HABC will reinstitute the emergency waivers and process accordingly.

Planned Non-Significant Changes

No non-significant changes are planned.

Planned Changes to Metrics/Data Collection

The metric of this activity was updated to reflect the close of the current emergency waivers. In the event a state of emergency is reinstated, the benchmark may need to be updated.

Metrics

<i>HC #4 Displacement Prevention</i>				
Unit of Measurement	Baseline*	Benchmark*	Outcome	Benchmark Achieved?
Number of households at or below 80% of AMI that would lose assistance or need to move (decrease)	0	0		

**The benchmark represents the number of assisted households during the period of declared emergencies who are effectively protected from displacement*

Planned Significant Changes

No significant changes are planned.

Activity #2021-03: Growing Assets & Income Program: Thompson Settlement Agreement (Formerly the Economic Stability, Growth and Transition Program for the Thompson Settlement Agreement)

Plan Year Approved, Implemented, Amended

Approved FY 2021 and implemented FY 2022

Description/Update

BRHP has developed a Growing Assets and Income program (GAIN) for the Thompson Settlement Agreement which modifies and builds on the FSS model. The program is structured using a multi-track incentive model. In this model, milestones are categorized into four tracks: education, career, financial health, and homeownership. Each track has specific eligibility criteria and participants are able to choose which track(s) to participate in, depending on eligibility and funding availability.

Participating families commit to a three-to-five-year contract of participation in which achievement of individual family goals are incentivized through one-time payments disbursed contemporaneous with completion of the goal, and/or on-going payments deposited into an escrow or similar account that may be accessed through interim disbursements, or upon the successful completion of the contract. Payments to escrow accounts occur when individual goals are achieved and verified by the program, incentive payment amounts are listed in the table below. Contracts of participation require a recertification or interim recertification to have occurred within the prior 60 days and require an individual training plan to document goals and participant action items. This multi-track approach builds flexibility to meet varying needs of the families served and is intended to both promote financial stability and growth, and to provide a smooth transition to homeownership for families who have attained the means to successfully end their subsidy. Through greater numbers of families successfully exiting the program, new families from the waitlist may be served, in greater numbers.

BRHP has developed program documents and the Action Plan for the GAIN program and has secured private funding from a local foundation to launch the program and support some of the escrow payments. Additionally, BRHP is working with Compass Working Capital, a leader in the FSS space to provide technical support and/or training prior to program launch. The first program participants will be enrolled in 2022.

The general parameters for incentive payments are as follows:

Track	Incentive*	Goal
Education	\$300-500	Completion of GED, post-secondary degree, or career certification
	\$300	Completed semester or quarter for completion of full-time post-secondary or career training
Education	\$500	Establishment of college savings plan (529)
	\$300	School continuity credit for children completing all grade levels at a single school (e.g., k-5,6-8,9-12)
Career	\$300	Completion of first month of full-time employment, 4 months of full-time employment, or after an increase in wage income greater than 20%
	\$200	Monthly escrow contribution after month 4 of full-time employment with ongoing full-time employment
Financial Health	\$200	On-time tenant rent payments for a year
	\$50	Attendance at Financial Health workshop
Financial Health	\$500	Achieving credit score milestone
	\$250-1,000	Reaching savings milestones from \$,2500-\$10,000
Homeownership	\$1,000	Completion of accredited homebuyer education course and savings of at least \$2,000
	\$5,000	Closing cost or down payment assistance provided at closing

*Final incentive payment amounts will be dependent on HAP fund availability, outside funding leveraged, and enrollment in program.

Planned Non-Significant Changes

No non-significant changes are planned.

Planned Changes to Metrics/Data Collection

Benchmarks have been updated to reflect anticipated program activity in FY 2023.

Metrics

<i>SS #1: Increase in Household Income</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average earned income of households affected by this policy in dollars (increase)	\$0	\$16,806		
<i>SS #2: Increase in Household Savings</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?

Average amount of savings/escrow of households affected by this policy in dollars (increase)	\$0	\$300		
<i>SS #3: Increase in Positive Outcomes in Employment Status</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Employed	0	76 38%		
Unemployed	0	124 62%		
Enrolled in Education or Job Training Program	0	14 7%		
<i>SS #5: Households Assisted by Services that Increase Self Sufficiency</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households receiving services aimed to increase self-sufficiency (increase)	0	200		
<i>SS #8: Households Transitioned to Self Sufficiency*</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households transitioned to self-sufficiency (increase)	0	0		
<i>*Transitioned to self-sufficiency is defined as successful graduation from the program.</i>				

Planned Significant Changes

No significant changes are planned.

Activity #2022-01: Student Housing Initiative

Plan Year Approved, Implemented, Amended

Approved FY 2022 and implemented FY 2023

Description/Update

The Housing Authority of Baltimore City plans to utilize MTW Block Grant funding flexibility to support the Student Housing Initiative (SHI) which is a housing stability program for eligible low-income college students.

Initial eligibility for the SHI includes:

- Graduation from a Baltimore City high school;
- Qualification as an independent student using HUD's independent student criteria;
- Matriculation in a four- or five-year college program located within HABC's jurisdiction;
- Full-time student enrollment; and
- Maintenance of a grade point average of at least 2.5.

HABC will work in partnership with colleges/universities in HABC's jurisdiction to provide 10 time-limited, tenant-based vouchers for eligible SHI participants. Additionally, HABC will execute an MOU with the participating colleges/universities detailing roles and responsibilities for determining initial and continued eligibility and reporting requirements.

The participating Baltimore City colleges/universities will be responsible for identifying and referring eligible participants and for providing verification that the student meets HUD's criteria of an independent student. Participating colleges/universities will also be responsible for providing HABC with regular academic progress reports to ensure participants continue to be in compliance with continued occupancy and SHI program requirements, including maintaining a 2.5 grade point average. HABC will verify and calculate income to determine income eligibility.

The SHI subsidy will operate as follows:

- SHI participants will pay the highest of 10% of gross monthly income, 30% of adjusted monthly income or a \$25 minimum rent and will have recertifications completed on a biennial basis during their participation in the program.

- In the event the gross rent exceeds the applicable 1- or 2-bedroom payment standard, the SHI participant will pay the difference; however, HABC will not approve a unit where the family share is greater than 40% of the family's adjusted monthly income.
- Generally, the voucher will be provided for up to four years for eligible, matriculated, full-time students in an accredited 4-year college program and up to five years for eligible, matriculated, full-time students in an accredited 5-year college program. Students enrolled in 4-year community colleges within HABC's jurisdiction are also eligible under this activity.
- An additional post-graduation year may be provided if the student remains income eligible and has not yet secured permanent full-time employment. HABC will terminate the subsidy during fifth year within sixty (60) days of securing full-time employment. Participants will be required to notify HABC within 30 days of securing full-time employment.
- Where a student becomes part of the SHI program after they have already completed course work at a Baltimore City college/university, HABC will adjust the participation period in the program to reflect the remaining portion of the applicable year cap.
- The family size must be consistent with the occupancy standards for a 1- to 2-bedroom unit without being over-crowded.
- HABC will conduct reasonable rent determinations prior to unit approval.
- HABC will provide utility allowances to students where the cost of utilities is not included in the rent.
- The subsidy will be limited to housing assistance, in the form of rent in privately owned housing and will be paid directly to the housing provider; however, where applicable, the subsidy may cover security deposit assistance up to one month's subsidy.
- HABC will conduct the HQS inspections.
- If the student is at \$0 HAP for 6 months, the subsidy will be terminated, and assistance will no longer be provided.

- Prior to terminating a participant’s voucher, HABC will provide the participant with sixty day’s written notice and offer the participant an opportunity for an informal hearing where applicable.

Participants must continue to remain enrolled full-time and maintain a 2.5 Grade Point Average (GPA) in order to be eligible for subsidy renewal each year; however, this requirement is waived when an additional post-graduation year is authorized. Additionally, HABC will make available to SHI participants, self-sufficiency related services offered by HABC. Every student will be required to utilize academic support services and counseling services available at the college. If the student does not remain compliant with program terms, the subsidy may be terminated. The individuals issued SHI vouchers and served under this activity will become participants in the Housing Choice Voucher Program; however, their vouchers will have term limits. Upon HUD approval, HABC will accept referrals from the partner college/university for the 2022-2023 school year.

HABC and the participating educational institutions will review program outcomes and financial considerations to determine continued program viability and make any necessary changes to the program. Any such changes will be included in future MTW Plans as required under the Form 50900.

Participating colleges/universities will be responsible for providing HABC with regular academic progress reports to ensure participants continue to be in compliance with continued occupancy and SHI program requirements, including maintaining a 2.5 GPA. HABC will determine on an annual basis, the number and percent of SHI participants who maintain program compliance and remain in school. Where early termination rates increase, HABC will work with the college/university to identify potential activity changes which may be needed to increase program success rates. Where significant changes are needed, HABC will re-propose the SHI activity.

HABC will develop and execute MOUs with the partner colleges/universities. Additionally, program plans, policies and procedures will be developed along with a tracking mechanism to monitor outcomes. Selection of eligible recipients is anticipated for the 2023-24 school year. HABC will no longer accept referrals once the SHI program cap has been met.

Hardship

In the event that a student needs to take an extended leave from his or her academic program, the subsidy will be discontinued; however, the student may reapply, through their college/university, to the SHI as long as the program continues to operate. For leaves which do

not exceed two months in duration, and which have been reviewed and approved by HABC and the partner college/university, the subsidy will continue.

HABC anticipates that implementation for this activity will take place in the 2nd quarter of 2023.

Planned Non-Significant Changes

No non-significant changes are planned.

Planned Changes to Metrics/Data Collection

Metrics have been updated to reflect anticipated activity volume in FY 2023.

Metrics

<i>CE #4: Increase in Resources Leveraged</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Amount of funds leveraged in dollars (increase)	\$0.00	TBD*		
<i>*Upon identification of the participating colleges/universities, HABC will be able to determine the amount of leveraged funds.</i>				
<i>SS #5: Households Assisted by Services that Increase Self Sufficiency</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households receiving services aimed to increase self-sufficiency (increase)	0	5 households		
<i>SS #8: Households Transitioned to Self Sufficiency*</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households transitioned to self-sufficiency (increase)	0	0 households		
<i>*Self-sufficiency is defined as graduation from college.</i>				

Planned Significant Changes

No significant changes are planned.

Activity #2022-02: Leasing Incentive Program

Plan Year Approved, Implemented, Amended

Approved FY 2022 and implemented FY 2022

Description/Update

Using its MTW flexibility, HABC has established a Leasing Incentive Program (LIP) to promote utilization of vouchers and provide increased housing options and opportunities for voucher holders. The HCV portion of this activity applies to owners of units in the tenant-based voucher program and does not apply to owner/units in the Project-Based program. Additionally, to further reduce the vacancy rates in underutilized/hard to house Public Housing (PH), the LIP provides incentives to lease PH units in these areas/developments or portions thereof.

HCV Leasing Incentive: HABC provides leasing incentives to owners to increase the number of units in Opportunity Neighborhoods, increase the number of new construction and substantially rehabilitated units, new leased units, accessible units and new owners on the program. HABC's Opportunity Neighborhoods are those sub-markets which have been identified in an HABC commissioned study and which reflect key indicators of neighborhood opportunity including, poverty rate, school quality index, crime, diversity, transportation access and labor market conditions.

To support and encourage owner participation in the HCV program, the LIP will also provide vacancy and damage payments to owners payable under defined circumstances. HABC has capped the spending on this activity at \$1,000,000 (\$500,000 for leasing incentives and \$500,000 for damage/vacancy loss) in the first year of this activity. Pending the response to this activity; HABC may revise the program caps in future years.

HABC will provide the following under the LIP for the HCV program:

- A \$750 one-time incentive for a new unit in an "Opportunity Area". "Opportunity Areas" are those zip codes which have been identified by HABC as Opportunity Areas.
- A \$500 one-time incentive for a new HCV program unit. "New Unit" refers to a unit which has never been leased under the HCV program or was last leased under the HCV program five or more years ago.

- A \$500 one-time incentive to a new owner who leases an HCV unit. “New Owner” refers to an owner who has never previously leased a unit under the HCV program or who had last leased a unit under the HCV program five or more years ago. The new owner must enter into a new HAP contract.
- A \$500 one-time incentive for a new accessible dwelling unit. An accessible dwelling unit is a unit that is located on an accessible route and can be approached, entered, and used by individuals with physical disabilities.
- A \$500 one-time incentive for a newly constructed unit. “Newly constructed” refers to a unit in which construction was completed within the past twenty-four months. Where a new unit to the program is new construction, the owner will receive only the new construction incentive.
- A \$500 one-time incentive for a substantially rehabilitated unit. “Substantially rehabilitated” refers to units that meet the one of the following criteria:
 - The required repairs, replacements, and improvements involve the replacement of two or more major building components, or
 - The costs of the rehabilitation exceed the greater of 15 percent (exclusive of any soft costs) of the property's replacement cost (fair market value) after completion of all required repairs, replacements, and improvements; or \$6,500 per dwelling unit (adjusted by HUD's authorized high-cost percentage); or 20% of the mortgage proceeds applied to rehabilitation expenses.
- The maximum incentive payment for any given unit is \$1,500.
- Incentive payments are payable upon execution of the HAP contract.
- Where a unit had previously been leased by an HCV participant and there is a gap in leasing with the HCV program, HABC will not provide an incentive when and if the unit gets leased by a new HCV participant unless the gap is five or more years.

Vacancy and Damage Loss Payments: Where vacancy and damage loss payments are concerned, HABC provides payments to owners. Owners will be considered eligible for these payments for up to 12 months from the effective date of the HAP contract with HABC. Vacancy and damage loss payments will no longer apply if the vacancy and/or damage loss occurs beyond the first 12 months of occupancy.

- Vacancy loss payments will be made available to owners whose tenants vacate the unit without notice or HABC authorization, prior to the end of their lease term. To qualify for the vacancy loss payment, the unit owner must re-rent the unit to another HCV family within 60 days from the date that the owner notifies HABC of move-out. Owners will be paid only for the length of time the unit was vacant, with a maximum payment equivalent to the lowest of two months of HAP or \$3,000. In addition, HABC

will only reimburse owners to the extent that the lost rent is not covered by the security deposit (after being applied to any damages). Finally, owners must demonstrate a good faith effort to re-rent the unit to another HCV family during the period of vacancy. Requests for vacancy claims must be submitted within 30 days of re-leasing of the unit.

- Damage loss payments: HABC will provide damage loss payments equivalent to the lowest of two months of HAP or \$3,000 for owners to cover costs, beyond normal wear and tear, which are not covered by the security deposit, provided that the owner agrees to lease the unit to another HCV client within 60 days from the date that the owner notifies HABC of the damages. HABC will not reimburse for tools needed to repair damages, landlord's personal time to repair damages or other activities related to the claim, items allegedly stolen, or damages not represented in a move-in/out condition report. Requests for damage claims must be submitted within 30 days of the tenant vacating the unit or owner re-taking possession. HABC will inspect the unit to validate the owner's damage claim.

PH Leasing Incentive: HABC provides leasing incentives to applicants who agree to accept hard to lease units. A unit is considered hard to lease when the unit has been vacant for more than 45 days after being placed in a "ready to lease" status and there have been three prior unit refusals for the current vacancy. Where an applicant accepts a unit offer and signs the lease for a hard to lease unit, HABC will offer a rent credit equivalent to the calculated TTP or a gift card to a store/website that offers home goods and/or home improvement products with a value of \$100. Applicants may select which incentive they would like to receive.

Planned Non-Significant Changes

In FY 2023 HABC will add a feature to its Leasing Incentive Program to include Security Deposit Assistance for voucher holders who meet one or more of the criteria below:

1. Required to move due to owner HQS violations;
2. New admissions and existing participant families who move and whose gross annual incomes are lower than 50% of AMI; or
3. Existing Elderly/disabled families who move.

HABC will provide security deposit assistance, up to the contract rent for eligible HCV families. This assistance opportunity will be provided once during the life of a family's participation in the HCV program. HABC will provide the security deposit directly the owner; however, upon move out, the security deposit will go back to the family for use in leasing another unit. HABC is using this feature to provide incentive for voucher holders to maintain their units to ensure they can

use the returned security deposit to move to another HCV unit, where applicable. HABC anticipates that approximately 2,300 families will benefit from the security deposit assistance and that the average security deposit will be approximately \$1,300 per family. HABC has budgeted accordingly to cover this cost; however, HABC reserves the right to modify the amount of the security deposit assistance for consistency with economic conditions and funding availability.

Planned Changes to Metrics/Data Collection

Metrics have been updated to reflect anticipated outcomes in FY 2023.

Metrics

<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 this activity (increase)	0 units	HCV: 1,333 units PH: 75 units		
<i>*Metric is calculated using the planned total incentive payments of \$1,000,000 at an average of \$750 per incentive</i>				
<i>HC #3: Decrease in Wait List Time</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average applicant time on wait list in months (decrease)	HCV: 8 years PH: 7 years	HCV: 7 years PH: 6.5 years		
<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)	0 households	222 households		
<i>*Metric reflects incentives for households who leased new units in opportunity areas and/or units of new construction. This metric applies only to HCV</i>				

Planned Significant Changes

No significant changes are planned.

B. Not Yet Implemented Activities

There are no approved activities, which have not been implemented.

C. MTW Activities on Hold

There are no approved activities on hold.

D. Closed-Out MTW Activities

The following table summarizes previously approved MTW activities that HABC has completed, discontinued, or determined do not require MTW authority to implement. HABC will report on any additional activities, which have been closed out in the FY 2021 MTW Report.

Table 10: Closed-Out MTW Activities

Activity	Plan Year Approved and Implemented	Close Out Year	Reason for Close Out
Risk-Based Inspections (Activity #2006-05)	Approved: FY 2006 Implemented: FY 2014	FY 2019	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 that have consistently met annual inspection standards, will be inspected every two years. Units which do not have such a track record are inspected annually. HABC closed out this activity due to the 2014 Appropriations Act that allows HABC to transition to a biennial inspection schedule without MTW authority.
Project-Based for Transitional Housing (Activity #2007-02)	FY 2007/2008	FY 2014	HABC provided PB vouchers to the Collington House facility that is a transitional housing program. In 2014, the Collington House facility lost its eligibility to retain project-based vouchers and this program was closed out.
Section 811 Supportive Housing (Activity 2009-02)	Never Implemented	2019	HABC proposed combining MTW funds with 811 funds to create units for non-elderly persons with disabilities pursuant to the Bailey Consent Decree. HABC intended to make these funds available through a competitive process under which developers would be required to demonstrate through specified documentation that the project had a gap that could not otherwise be addressed. HABC was not able to implement this activity due to a lack of interest from developers. As such, there are no final outcomes. Gauging developer interest and including developers in the planning stages of such an activity may have yielded better outcomes.
Payment Standards at the 50 th Percentile (Activity #2009-03)	FY 2009	FY 2011	HUD had adjusted the area Fair Market Rent (FMR) to the 50 th percentile for HABC; therefore, MTW authority was no longer required and this activity was closed out in FY 2011. Please note that this activity was re-proposed in the FY 2019 Plan as the 50 th percentile FMR was being phased out. At the time the activity was closed, use of the 50 th percentile FMR was provided by HUD, and MTW authority was not needed.

Activity	Plan Year Approved and Implemented	Close Out Year	Reason for Close Out
HAP Contract Modifications (Activity #2009-05)	Approved: FY 2009 Implemented: FY 2010	FY 2019	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 previously HUD approved activity was closed out and combined with other previously HUD approved Project- Based Program activities. The combined activity is now called the Enhanced Project-Based Voucher Program (Activity #2006-02).
Utility Allowance for Families Living in Larger Units than Voucher Size (Activity #2010-04)	Approved: FY 2010 Implemented: FY 2012	FY 2014	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, approved in FY 2010, was incorporated into the Unit Size activity and implemented in FY 2012. Based upon the 2014 Appropriations Act language, HABC no longer needs to designate this activity as MTW.
Gilmor Self Sufficiency Initiative (Activity #2010-05)	FY 2010	FY 2017	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, and the activity was closed out in FY 2017 when 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.
Rent Increase Determinations (Activity #2011-01)	FY 2011	FY 2016	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 since HABC was able to maintain budgetary limits without imposing suspension of rent increases to owners.
Asset Self-Certification (Activity #2011-02)	FY 2011	FY 2019	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. HABC closed out this activity and re-proposed it in FY 2019 as part of the Rent Simplification activity. This action allows HABC to report on all Rent Simplification activity features under one activity.

Activity	Plan Year Approved and Implemented	Close Out Year	Reason for Close Out
Direct Homeownership Program (Activity 2012-02)	2012	2019	The direct purchase second mortgage program was intended for applicants with incomes of no less than \$18,000 per year. Participants in this initiative would not receive a Section 8 homeownership voucher. A soft second mortgage of HOME VI funds would also be available. The direct purchase second mortgage program was targeted to applicants with incomes of no less than \$18,000 per year. Participants in this initiative would not receive a Section 8 homeownership voucher. A soft second mortgage of HOME VI funds was to be made available through this program. The activity was closed out due to lack of participation.
Rent Policy (Activity #2012-03)	FY 2012	FY 2015	HABC received HUD approval in FY 2012 to implement an Agency-wide 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. A shortage of funds to provide employment counseling forced the closure of this program in FY 2015.
Adjusted Income for Thompson Participants (Activity #2012-04)	FY 2012	FY 2019	<p>Pursuant to HABC's MTW authority, for participants in the Baltimore Housing Mobility Program, gross annual income was reduced using standard deductions. This activity was approved and implemented in FY 2012.</p> <p>There is a standard deduction for working families, disabled families and non-disabled families without wages. The deductions replace all other regulatory deductions. The deductions are:</p> <ul style="list-style-type: none"> • \$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) <p>This activity was closed out 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 #2012-01).</p>
Adoption of New Investment Policies for HABC (Activity #2013-01)	Approved: FY 2013 Not Implemented	FY 2015	In FY 2013, HABC proposed adopting new investment policies, thereby increasing investment revenue and decreasing the federal expenditures necessary to carry out the federal program. For example, if the investment revenue is increased by \$100,000 due to a more favorable investment rate of return, this increased revenue can be used to offset the OPEB liability. HABC decided not to implement this activity due to the terms of a General

Activity	Plan Year Approved and Implemented	Close Out Year	Reason for Close Out
			Depository Agreement with the State. This activity was never implemented.
Journey Home (Activity #2013-02)	FY 2013	FY 2017	Under this activity, HABC exercised its MTW fund flexibility in order to use MTW Block Grant Funds as housing subsidy for participants in the Journey Home Program. The Journey Home Program was closed in FY 2016 and the activity was closed out in FY 2017.
Exclude Income from Full-Time Students and Adopted Household Members (Activity #2014-02)	FY 2014	FY 2019	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. This activity was closed out 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 #2012- 01).
Encouraging Leasing in Higher Opportunity Neighborhoods (Activity #2015-01)	Approved: FY 2015 Not Implemented	FY 2016	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. 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.
Energy Conservation Utility Allowance (Activity #2015-02)	FY 2015	FY 2016	HABC provides a Utility Allowance 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. This MTW activity was placed on hold due to comments from the public and closed out in FY 2016.

Activity	Plan Year Approved and Implemented	Close Out Year	Reason for Close Out
The Front Door Program (Activity #2015-03)	FY 2015	FY 2017	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. The contract ended December 31, 2014, six months into HABC’s FY 2015, and was not renewed, which resulted in closure of the activity.
Project Based Voucher Amendments to the HAP Contract (Leased Housing) (Activity #2015-04)	FY 2015	FY 2019	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 activity, 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. HABC closed out this activity and combined it with other previously HUD approved Project Based program activities. The combined activity is now called the Enhanced Project-Based Voucher Program (Activity #2006-02).
Security Deposit Assistance (Activity #2017-02)	FY 2017	FY 2019	Under this 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 FY 2017. HABC closed out this activity and combined it with other previously HUD approved Mobility Program Enhancement activities. HABC also modified this activity in FY 2019 under the previously approved Mobility Enhancement activity.
Sponsor-Based Project-Based Transitional Housing (Activity # #2017-01)	FY 2017	FY 2021	HABC partnered with the Women’s Housing Coalition to provide permanent housing for up to 25 homeless, hard-to-house families. A HAP Contract has been signed for up to 15 years with the option to renew; all families are housed and receiving supportive services allowing this activity to be closed out.

Activity	Plan Year Approved and Implemented	Close Out Year	Reason for Close Out
Landlord Payment Methods and Electronic Communication (Activity #2018-01)	FY 2018	FY 2020	HABC has moved to 100% online communication; this activity was originally developed to encourage enrollment in online communications or be charged a fee for paper communications. Almost 100% of owners are enrolled in direct deposit and receiving electronic communications; therefore, this activity is not cost effective and can be closed out.

V. Planned Application of MTW Funds

This section of the Annual Plan describes HABC’s estimated sources and uses of MTW Block Grant funds. This financial plan is compiled based on current information and is subject to revision as conditions and/or assumptions change. HABC has included, as Appendix A, the Estimated Sources and Uses of Non-MTW Funds for FY 2023.

A. Estimated Sources and Uses of MTW Funds in FY 2023

i. Estimated Sources of MTW Funds

Table 11: Estimated Sources of MTW Funding for FY 2023

FDS Line Item Number	FDS Line Item Name	Dollar Amount
70500 (70300+70400)	Total Tenant Revenue	\$19,069,169
70600	HUD PHA Operating Grants	\$397,380,261
70610	Capital Grants	\$20,092,412
70700 (70710+70720+70730+70740+70750)	Total Fee Revenue	-
71100+72000	Interest Income	\$139,917
71600	Gain or Loss on Sale of Capital Assets	-
71200+71300+71310+71400+71500	Other Income	\$1,403,508
70000	Total Revenue	\$438,085,267

Notes to Sources:

- Tenant Revenue is planned at a 97% occupancy rate. Total Tenant Revenue also includes estimated income billable from various tenant transactions such as warrant, court and maintenance costs anticipated during CY 2023.
- HABC’s Total Operating Grants of \$397,380,261 from HUD include the following funding estimates:
 - HCV Housing Assistance Payments (HAP) subsidies in the amount of \$249,517,555 and \$60 million in MTW/HAP funds;
 - Ongoing Administrative Fee Earned in the amount of \$17,327,932; and
 - Public Housing Subsidies of \$70,534,774, which is budgeted based on an estimated 93% funding proration for the calendar year ending December 31, 2023.

- Capital Grants funding of \$20,092,412 is based on planned capital improvement and construction activities as described in the Capital Improvement Plan.
- HABC does not report Fee Revenue as HABC has adopted a Local Asset Management Plan since FY 2010.
- Other Income is related to vending machines, excess utilities, and tenant charges from the Public Housing Program. It also includes Fraud Recovery for the recovery of funds from the Section 8 HCV program and reimbursements from Baltimore Affordable Housing Development.

ii. **Estimated Application of MTW Funds**

Table 12: Estimated Application of MTW Funding for FY 2023

FDS Line Item Number	FDS Line Item Name	Dollar Amount
91000 (91100+91200+91400+91500+91600+91700+91800+91900)	Total Operating – Administrative	\$45,477,928
91300+91310+92000	Management Fee Expense	\$127,285
91810	Allocated Overhead	\$(554,582)
92500 (92100+92200+92300+92400)	Total Tenant Services	\$3,417,813
93000 (93100+93600+93200+93300+93400+93800)	Total Utilities	\$17,263,284
93500+93700	Labor	-
94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	\$29,625,813
95000 (95100+95200+95300+95500)	Total Protective Services	\$1,606,982
96100 (96110+96120+96130+96140)	Total Insurance Premiums	\$2,968,058
96000 (96200+96210+96300+96400+96500+96600+96800)	Total Other General Expenses	\$13,004,593
96700 (96710+96720+96730)	Total Interest Expense and Amortization Cost	\$1,772,703
97100+97200	Total Extraordinary Maintenance	\$1,250,000
97300+97350	Housing Assistance Payments + HAP Portability-In	\$247,117,555
97400	Depreciation Expense	\$18,455,649
97500+97600+97700+97800	All Other Expenses	-
90000	Total Expenses	\$381,533,081

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

Total Expenses	\$381,533,081
Less: Depreciation Expense	\$(18,455,649)
Capital Hard Cost	\$75,532,191
MTW Uses of Funds	\$438,609,623

Notes to Uses:

- 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 includes operating expenses such as office rent, telephone, computer materials and contracts, postage and supplies for all programs.
- Management Fees expense includes fees for HABC’s Privately Managed Sites by outside management firms and fees to BRHP for the Mobility counseling program.
- Allocated Overhead is calculated based on HUD’s approved Local Asset Management Program since FY 2010. The proposed updated cost allocation calculations for CY 2023 are included in LAMP in Appendix B.
- 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.
- 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.
- 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 and use of MTW/HAP funds for vacancy renovations.
- Protective Services includes outside security contracts for the developments.

- 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.
- Other General Expenses include compensated absences, collection losses for uncollected rent and Payment in Lieu of Taxes (PILOT) and use of MTW/HAP funds.
- Interest Expense is budgeted for interest associated with the EPC Debt Service.
- Extraordinary Maintenance is planned for the unforeseen breakdown of heating systems, boilers, chillers, etc. This line also includes Casualty Loss, which is estimated for unforeseen repairs and losses at public housing units that are not covered by insurance carriers.
- HAPs include rent subsidies paid to landlords and utility assistance paid to tenants under the Section 8 HCV program.
- 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.

Description of Any Variance between Estimated Total Revenue and Estimated Total Expenses

Uses of funds exceed Sources of funds by \$524,356. The variance is due to increased staffing costs to assist in HCVP lease-up efforts.

iii. Description of Planned Application of MTW Funding 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.

HABC plans to use up to \$60 million in FY 2023 utilizing the prior year's HCVP HAP reserves to fund the following:

- Up to \$20 million for construction and acquisition costs in support of HABCs strategic plan goals.

- Up to \$10 million for renovation and rehabilitation of existing vacant units
- Up to \$5 million for modernization activities
- Up to \$10 million in support of maintenance activities in existing units
- Up to \$15 million for modernization upgrades for internet connectivity at the AMPs

B. Planned Application of PHA Unspent Operating Fund and HCV Funding

Table 13: Planned Unspent Operating Fund and HCV Funding

Original Funding Source	Beginning of FY 2022 – Unspent Balances, Including HUD-Held Reserves	Planned Application of PHA Unspent Funds During FY2023, Including HUD-Held Reserves
HCV HAP*	\$78,161,522	\$60,000,000
HCV Admin Fee	\$28,423,426	
PH Operating Subsidy	\$74,364,459	
TOTAL:	\$180,949,407	\$60,000,000

* Unspent HAP funding should not include amounts recognized as Special Purpose Vouchers reserves.

** HUD’s approval of the MTW Plan does not extend to a PHA’s planned usage of unspent funds amount entered as an agency’s operating reserve. Such recording is to ensure agencies are actively monitoring unspent funding levels and usage(s) to ensure successful outcomes as per the short- and long-term goals detailed in the Plan.

Table 14: Description of Planned Expenditures of Unspent Operating Fund and HCV Funding

Item No	Planned Use	Estimated Amount	Funding Source the Planned Use is Attributable to	Projected Timeline or Timeline Update
1.	Vacancy Renovations	\$10,000,000	HAP Reserves	1/1/23 - 12/31/23
2.	Maintenance Activities	\$10,000,000	HAP Reserves	1/1/23 - 12/31/23
3.	Modernization Activities	\$5,000,000	HAP Reserves	1/1/23 - 12/31/23
4.	Development Activities	\$20,000,000	HAP Reserves	1/1/23 - 12/31/23
5.	Internet Connectivity	\$15,000,000	HAP Reserves	1/1/23 - 12/31/23

C. Local Asset Management Plan (LAMP)

- i. *Is the MTW PHA allocating costs within statute?*
- ii. *Is the MTW PHA implementing a local asset management plan (LAMP)?*
- iii. *Has the MTW PHA provided a LAMP in the appendix?*

- iv. If the MTW PHA has provided a LAMP in the appendix, please describe any proposed changes to the LAMP in the Plan Year or state that the MTW PHA does not plan to make any changes in the Plan year.*

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 are included in Appendix B. The indirect cost rate for 2023 will be 16.47% for MTW and 15.71 for non-MTW.

D. Rental Assistance Demonstration (RAD) Participation

i. Description of RAD Participation

Table 15 includes RAD conversions which have closed or are projected to close by the end of FY 2022. Table 16 includes RAD conversions which are slated for conversion in FY 2023 and beyond. Actual timetables for conversion and/or HABC’s decision to proceed with conversion may vary from the information included below, depending on various factors including project feasibility determinations, project financing, timetables for HUD and other approvals and other factors. The timetable for RAD conversions extends beyond FY 2023 and continues to be refined in consultation with HUD and HABC’s resident leadership. The listed projects may be modified in the future and are subject to approval by HUD and the HABC Board of Commissioners. HABC may apply for additional RAD conversions beyond those shown in Tables 15 and 16.

Table 15: RAD Conversions Closed or Projected to Close by the End of FY 2022

Property Name	No. of Units Converted	RAD Conversion Type	Dated Closed or Projected to Close	Major Milestone/Status	RAD Significant Amendment Submission Date*	RAD Significant Amendment Approval Date
Allendale	164	PBRA	11/15	HUD approved the RAD Completion Certification.	5/12/15	10/27/15
Arbor Oaks	62	RAD PBV or Blend of RAD PBV & Tenant Protection Vouchers	12/22	4% LIHTC Application submitted 5/22.	12/31/2022	6/29/18
BE Mason	223	PBRA	11/15	HUD approved RAD Completion Certification.	5/12/15	10/27/15

Property Name	No. of Units Converted	RAD Conversion Type	Dated Closed or Projected to Close	Major Milestone/Status	RAD Significant Amendment Submission Date*	RAD Significant Amendment Approval Date
Bel Park Tower	253	PBRA	11/15	HUD approved the RAD Completion Certification.	5/12/15	10/27/15
Brentwood	150	PBRA	12/15	HUD approved RAD Completion Certification	5/12/15	10/27/15
Broadway Overlook	84	PBRA	8/17	HUD approved the RAD Completion Certification.	10/26/16	01/26/17
Chase House	189	PBRA	12/16	HUD approved the RAD Completion Certification	5/12/15	10/27/15
Ellerslie	117	PBRA	2/17	HUD approved the RAD Completion Certification	10/26/16	01/26/17
Govans Manor	191	PBRA	11/16	HUD approved the RAD Completion Certification	10/26/16	01/26/17
Heritage Crossing	75	PBRA	11/18	HUD approved the RAD Completion Certification.	12/1/17	6/29/18
Hillside Park	30	PBRA	12/17	Under review for HUD certification completion	12/1/17	6/29/18
Hollander Ridge	94	PBV	12/21	All renovations completed and units leased in 2021. HUD approved the RAD Completion Certification	9/20/19	12/19/19
Hollins House	130	PBRA	11/15	HUD approved the RAD Completion Certification.	5/12/15	10/27/15
J. Van Story Branch Apts	350***	PBRA	11/18	HUD approved RAD Completion Certification	12/1/17	6/29/18
Lakeview Tower	302	PBRA	11/15	HUD approved the RAD Completion Certification.	5/12/15	10/27/15
McCulloh Extension	347**	PBRA	11/16	HUD Approved RAD Completion Certification	5/12/15	10/27/15

Property Name	No. of Units Converted	RAD Conversion Type	Dated Closed or Projected to Close	Major Milestone/Status	RAD Significant Amendment Submission Date*	RAD Significant Amendment Approval Date
Monument East	170	PBRA	10/18	HUD Approved RAD Completion Certification	12/1/17	6/29/18
Perkins I RAD/CNI	20 RAD PBV & 28 PBV	RAD Section 18 Blend	6/22	Projected closing 6/22.	TBD	TBD
Pleasant View Gardens Senior	110	PBRA	7/16	HUD approved RAD Completion Certification	5/12/15	10/27/15
Pleasant View Gardens Townhomes	201	PBRA	9/16	HUD approved the RAD Completion Certification.	5/12/15	10/27/15
Primrose Place	125	PBRA	2/16	HUD approved RAD Completion Certification	5/12/15	10/27/15
Rosemont Low Rise Townhomes	106	PBRA	12/22	RCC issued in 4/22. 4% LIHTC application submitted in 7/21.	TBD	TBD
Rosemont Tower	203	PBRA	9/19	HUD approved RAD Completion Certification	12/1/17	6/29/18
Scattered Sites (Thompson 58/Broadway Homes)	58	PBRA	5/19	HUD approved RAD Completion Certification	04/12/17	12/27/17
Senior Townes at the Terraces	47	PBRA	11/17	HUD approved the RAD Completion Certification.	10/26/16	01/26/17
Somerset Court Extension	57 RAD & 7 NEDS	57 PBRA & 7 PBV	12/19	Under review for HUD Certification Completion	12/1/17	6/29/18
Somerset Homes/CNI Phase 2	100	67 RAD & 33 PBV	6/21	Project construction underway	9/20/19	12/19/19
Somerset Homes/CNI Phase 3	36	15 RAD & 21 PBV	11/21	Project construction underway	9/20/19	12/19/19

Property Name	No. of Units Converted	RAD Conversion Type	Dated Closed or Projected to Close	Major Milestone/Status	RAD Significant Amendment Submission Date*	RAD Significant Amendment Approval Date
Wyman House	168	PBRA	12/15	HUD approved the RAD Completion Certification.	5/12/15	10/27/15
Total	4,197					

Date reflects submission of the latest revision to the applicable Plan which was subsequently approved by HUD; ** 2 dwelling units were lost due to conversion to laundry facilities; * 7 dwelling units lost due to addition of an elevator and laundry facilities.*

The table below identifies projects that are anticipated to be converted under RAD in FY 2023 and future years. Future RAD Significant Amendments will be prepared and submitted per HUD required timelines. Please note that subject to financing and final HUD approval, the RAD conversion type may change.

Table 16: RAD Conversions Projected to Close in FY 2023 and Future Years

Property Name	RAD Units	RAD Conversion Type	CHAP Received (Yes/No)	Major Milestones
Albemarle Square	130	RAD PBV or Blend of RAD PBV and PBV	No	RAD conversion will not take place in 2023.
Carey House	23	RAD PBV or Blend of RAD PBV and PBV	Yes	RAD conversion may take place in 2023.
Dukeland	30	RAD PBV or Blend of RAD PBV and PBV	Yes	RAD conversion will not take place in 2023.
Laurens House	36	RAD PBV or Blend of RAD PBV and PBV	Yes	RAD conversion may take place in 2023.
McCulloh Homes	556	RAD PBV or Blend of RAD PBV and PBV	Yes	The overall concept plan for the site has been developed. RAD conversions will not take place in 2023.
Oswego Mall	35	RAD PBV or Blend of RAD PBV and PBV	Yes	RAD conversion will not take place in 2023. Pursuing demo application.

Property Name	RAD Units	RAD Conversion Type	CHAP Received (Yes/No)	Major Milestones
Poe Homes	288	RAD PBV or Blend of RAD PBV and PBV	Yes	Developer selected & MDA executed; Choice Neighborhood Transformation Plan submitted to HUD on 9/3/20; HUD approved the Poe Transformation Plan on January 5, 2021. HABC may submit a dispo/demo application and a CNI Implementation Grant application in 2023 and/or subsequent years.
Reservoir Hill 2	40	RAD PBV or Blend of RAD PBV and PBV	No	RAD conversion will not take place in 2023.
Sharp Leadenhall	23	RAD PBV or Blend of RAD PBV and PBV	No	RAD conversion will not take place in 2023.
Shipley Hills	24	RAD PBV or Blend of RAD PBV and PBV	Yes	Developer selected. RAD conversion will not take place in 2023.
Thompson 22	22	RAD PBV or Blend of RAD PBV and PBV	No	RAD conversion will not take place in 2023.
Townes at the Terraces	202	RAD PBV or Blend of RAD PBV and PBV	Yes	RAD conversion may take place in 2023.
TOTAL	1,409			

- i. *Has the MTW PHA submitted a RAD Significant Amendment? A RAD Significant Amendment should only be included if it is a new or amended version that requires HUD approval.*

Yes

- ii. *If the MTW PHA has provided a RAD Significant Amendment in the appendix, please state whether it is the first RAD Significant Amendment submitted or describe any proposed changes from the prior RAD Significant Amendment.*

A RAD Significant Amendment is included in Appendix K of this Plan. This is an amended RAD Significant Amendment to the previously approved RAD Significant Amendments which were part of HABC's approved 2018 MTW Plan and HABC's approved 2020 MTW Plan.

The Significant Amendment in Appendix K reflects the following changes:

Changes to the approved RAD Significant Amendment in the 2018 MTW Plan:

- Arbor Oaks: Conversion Type has been changed from PBRA to RAD PBV or RAD/Section 18 Blend of PBV and Tenant Protection Vouchers
- Townes at the Terraces: Conversion type has been changed from PBRA to RAD PBV or RAD Section 18 Blend of PBV. Unit count has been changed from 203 to 202. The 1-bedroom unit count was changed from 0 to 2 and the 3-bedroom unit count changed from 110 to 107 to reflect a reconfiguration of units.

Changes to the approved RAD Significant Amendment in the 2018 MTW Plan:

- Carey House: Conversion Type has been changed from PBRA to RAD PBV or Blend of RAD PBV and PBV.
- Laurens House: Conversion Type has been changed from PBRA to RAD PBV or Blend of RAD PBV and PBV.
- The Rosemont Family (low-rise): Conversion Type has been changed from PBRA to RAD PBV or Blend of RAD PBV and PBV. The 3-bedroom unit count was changed from 64 to 65 and the 5-bedroom unit count changed from 7 to 6 to reflect a reconfiguration of units. Total unit count remains the same.

HABC has also included a list of items which do not constitute a Substantial Deviation to its MTW Plan.

VI. Administrative

A. Board Resolution and Certification of Compliance

A Resolution approving the FY 2023 MTW Annual Plan Amendment and the MTW Plan Certifications of Compliance will be attached (Appendix C and Appendix D). HABC has also attached a Certification of Consistency with the Consolidated Plan (Appendix E).

B. Documentation of Public Process

HABC provided public notice of the FY 2023 MTW Annual Plan and posted the Plan on its website. A 30-day public comment period to allow for resident and general public review was provided from September 8, 2022 through October 10, 2022. A public hearing is scheduled for October 3, 2022 at Pleasant View Gardens at 5 PM. Copies of Advertisements, written comments, public hearing comments and HABC responses will be attached to the final MTW Plan for submission to HUD, (Appendices F, G and H)

C. Planned & Ongoing Evaluations

HABC will continue to monitor and evaluate MTW activities during FY 2023. 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. Lobbying Disclosures

HABC does not have any lobbying activities to disclose. HABC will include the Lobbying Activities (SF- LLL) and Certification of Payments (HUD-50071) forms. See Appendix I and Appendix J.

Appendix A: Estimated Sources and Uses: Non-MTW Funds

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 data as of August 2022. 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.

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

- Other HCV Programs including the HCV Veterans Affairs Supportive Housing, Moderate Rehabilitation, Family Unification and Non-elderly disabled programs.
- State and Local Programs
- HABC’s forced account (HABCo)
- Planning and Development programs
- Partnership Rental Housing Programs (PRHP) market rate units
- Resident Service Grants

Estimated Sources of Non-MTW Funds

Estimated Sources of Non- MTW Funding for FY 2023

SOURCES	
FDS Line Item Name	Dollar Amount
Tenant Revenue	\$1,726,206
HUD PHA Operating Grants	\$18,812,311
Capital Grants	-
Total Fee Revenue	-
Interest Income	-
Gain or Loss on Sale of Capital Assets	-
Other Income	\$7,307,940
Total Revenue	\$27,846,457

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 HCV programs in the amount of \$13,940,224
 - Ongoing Administrative Fees Earned estimated in the amount of \$164,310
3. Other Income includes the following:

- HABCo’s construction and maintenance activities \$1,628,264
- Market rate activities \$3,347
- City of Baltimore reimbursement of pass-through activities \$3,075,000
- Resident Services grant activities \$1,392,023
- Planning & Development activities \$1,855,178
- HUD CNI grant \$4,061,905

Estimated Uses of Non-MTW Funds

Estimated Uses of Non- MTW Funding for FY 2023

USES	
FDS Line Item Name	Dollar Amount
Total Operating – <i>Administrative</i>	\$4,992,313
Management Fee Expense	\$114,685
Allocated Overhead	\$554,582
Total Tenant Services	\$2,262,378
Total Utilities	\$255,480
Labor	-
Total Ordinary Maintenance	\$845,238
Total Protective Services	\$33,204
Total Insurance Premiums	\$660,211
Total Other General Expenses	\$403,892
Total Interest Expense and Amortization Cost	-
Total Extraordinary Maintenance	-
Housing Assistance Payments	\$13,940,224
Depreciation Expense	\$203,999
All Other Expenses	-
Total Expenses	\$24,266,206

Total Expenses	\$24,266,206
Less: Depreciation Expense	(\$203,999)
Hard Cost	\$4,091,445
Non-MTW Uses of Funds	\$28,153,652

Uses of funds exceed Sources of funds by \$307,196, which will be supported by non-ACC reserves.

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 CY 2023 are included in Appendix C.
3. Tenant Services include salaries and benefits of employees for the Resident Services grants and includes other materials and services as required by the grant agreements.
4. Ordinary Maintenance expenses are related to the City of Baltimore pass-through (non-capitalized) activities being performed by HABC's force-labor department (HABCo). HABC receives reimbursement from the City for these activities, PRHP units, maintenance for HABC’s non-ACC properties and maintenance of spaces occupied by Tenant Svcs grant personnel.
5. Other General Expenses include PILOT, applicable portions of compensating absence for the non-MTW programs, bad debt and RFR for HABC’s market rate units.
6. Housing Assistance Payments (HAPs) include rent subsidies paid to landlords and utility assistance paid to tenants of Other HCV programs.

Appendix B: Local Asset Management Plan

HABC CY23 Indirect Cost Rate Explanation: A component of HABC's Local Asset Management Plan

This cost allocation plan and process for Calendar Year 2023 represents year ten of HABC's local asset management plan allowed and approved as a component of its MTW participation.

Cost Allocation Approach

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

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

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

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

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

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

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

The specific approach is as follows:

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

All costs used in this analysis are from the HABC Fiscal Year 2022 Approved Consolidated Budget. Based on this budget and the attached schedule, the indirect cost rate for CY2023 will be 16.47% for MTW and 15.71% for non-MTW (see Attachment A for detail).

Appendix B: Local Asset Management Plan (Attachment A)

<i>Line</i>	OFR <i>Treatment</i>	FY20	FY21	FY22	Change	Share	MTW	Non-MTW	OH Limit	OH shortfall	Comments	Proof	Sites Total	Ind Depts
Sites (LIPH)	Dir	53,232,430	53,462,088	53,759,383		0%	14%	53,675,664		83,719		-		
Sites PVT	Dir	7,625,326	3,210,418	2,315,832		-58%	1%	2,315,832				-		
Sites (CFP hard-includes ECI)	Dir	24,543,446	17,464,019	15,843,908		-29%	5%	15,843,908				-		
Sites (CFP soft - includes ECI)	Dir	1,609,030	2,933,085	2,731,043		82%	1%	2,731,043				-		
Sites - Spec/Non-routine	Dir	-	-	-			0%					-		
EPC Costs (Hard) (Loan)	Dir	2,708,177	4,887,146	727,128		80%	1%			727,128		114,258		
EPC Soft (Loan)	Frontline	197,702	384,047	341,269		94%	0%	-		341,269		-		
Crews	COCC	2,694,587	2,835,484	2,802,070		5%	1%	2,802,070				-		
HCVP HAP	Dir	233,920,312	231,754,975	283,316,839		-1%	60%	270,063,565		13,253,274		-		
HCVP Admin	Dir	10,412,164	13,828,617	10,985,320		33%	4%	10,849,660		135,660		-		
BRHP Admin	Dir	5,765,771	5,723,699	5,822,789		-1%	1%	5,822,789				-		
Development Hard/HOPE VI	Dir	10,195,794	7,857,800	5,517,382		-25%	2%			5,517,382		-		
Development Soft	Mixed	775,180	1,091,786	1,205,367		41%	0%			1,205,367		-		
DHCD Hard	Dir	-	4,860,000	2,948,701		✓	1%			2,948,701		-		
DHCD Soft	Mixed	4,082,381	3,016,000	-		-26%	1%			-		-		
RAB	Dir	191,469	184,572	212,705		-4%	0%	212,705		-		-		
Res Serv - LIPH	Frontline	1,619,185	1,837,722	2,237,291		13%	0%	2,237,291				-		
Res Serv - Grants	Frontline	4,158,797	3,882,331	2,281,958		-7%	1%			2,281,958		358,576		
Facilities Non ACC Properties			400,000	400,000		#DIV/0!	0%			400,000		-		
Energy	Frontline	683,633	690,909	562,945		✓	0%	562,945				-		
F&A Frontline		74,872	72,871	77,100		-3%	0%	77,100				-		
FHEO Front Line		123,509	91,021	93,855		-26%	0%	93,855				-		
HABCO Hard	Dir	-	-	-			0%	-				-		
HABCO Soft	Frontline	1,447,559	1,449,597	1,404,822		0%	0%			1,404,822		-		
Hsg. Applic.	Frontline	1,121,082	1,172,988	1,110,131		5%	0%	1,110,131				-		
Hsg. Ops. (dir)	Frontline	3,157,470	3,377,743	3,261,524		7%	1%	3,261,524				-		
Homnrshp	Frontline	42,830	-	-		-100%	0%					-		
Legal, Lease enforcement	Frontline	-	-	-		✓	0%					-		
MFA	Frontline	928,270	1,018,101	969,867		10%	0%	969,867				-		
Relocation	Frontline	-	-	-		✓	0%					-		
Work Order Ctr.	Frontline	-	-	-		✓	0%					-		
Fund 113	Dir	1,936,821	1,723,668	1,769,891		-1%	0%	-		1,769,891	88,494.55	189,618		
Undesignated/Legacy	Frontline	4,100,000	5,966,013	6,659,887		46%	2%	6,659,887				-		
Legal FL	Frontline	-	-	-			0%					-		
Less AMP/FL planned cuts	FL/Dir	-	(1,796,554)	-			0%	-				-		
Subtotal Direct		377,347,797	373,180,146	409,359,007		-1%	96%	379,289,836		30,069,171	88,495	662,452		

<i>Less: Non-Relevant Expenses</i>														
Hard Cost (Devel, HABCO)		37,645,119	30,008,965	22,088,418			-20%	15,843,908		6,244,510		-		
HAP		233,920,312	231,754,975	283,316,839			-1%	270,063,565		13,253,274		-		
BRHP		5,765,771	5,723,699	5,822,789			-1%	5,822,789				-		
Development Soft												-		
ORS Grants		4,158,797	3,882,331	2,281,958						2,281,958		-		
Debt Service												-		
Facilities				400,000						400,000		-		
Fund 113												-		
DHCD Hard cost		4,082,381	7,876,000	2,948,701			93%	-		2,948,701		-		
RAD Deduct (out in 20)		-	-	-				-		-		-		
Subtotal Direct		95,934,214	97,816,507	92,500,302			2%	87,559,574		4,940,728	88,495	662,452		

Appendix B: Local Asset Management Plan (Attachment A)

<i>Indirect</i>								2,975,258		
Admin Services	COCC	338,212	349,279	362,088	3%	0%				
Audits	COCC					0%				
Budgets	COCC	596,458	607,272	966,743	2%	0%				
CAO	COCC	331,460	334,710	315,645	1%	0%				
CFO	COCC	430,264	448,867	471,837	4%	0%				
Agency Wide	COCC					0%				
Communications	COCC	754,924	740,345	968,974	-2%	0%				
COO	COCC	493,856	479,258	568,362	-3%	0%				
CEO	COCC	799,331	905,538	753,055	13%	0%				
Facilities/Bldg. Support	COCC	1,073,906	1,102,710	1,188,400	3%	0%				
FHEO	COCC	479,060	520,328	709,963	9%	0%				
Finance & Accounting	COCC	1,774,998	1,790,592	1,654,085	1%	0%				
HousingStat	COCC					0%				
Human Resources	COCC	1,512,333	1,255,108	1,803,584	-17%	0%				
IT	COCC	1,893,658	2,377,280	2,221,150	26%	1%				
Inspector General	COCC	538,682	468,167	587,841	-13%	0%				
Legal - attorneys	COCC	1,503,685	1,510,649	1,746,721	0%	0%				
MPA	Frontline					0%				
P&D	COCC					0%				
Procurement	COCC	766,978	686,208	716,628	-11%	0%				
Legacy costs	COCC	75,217	71,021	-	-6%	0%				
5% Salary Addback	COCC									
Anticipated cuts COCC	COCC			(500,000)						
Subtotal Indirect		13,363,022	13,647,332	14,535,076	2%	4%	13,758,713	776,363		
Indirect Rate		13.93%	13.95%	15.71%						
Program totals (Dir + Ind)		109,297,236	111,463,839	107,035,378	2%					
Indirect Cost Rate (ID) - blended							13.95%	15.71%	15.71%	
TOTAL		390,710,819	386,827,478	423,894,083	-1%	100%	393,048,549	30,845,534		
<i>Reallocation of non-allocable overhead</i>							95%	5%		
							662,452	776,363		

Total Indirect Charges	13,363,022	13,647,332	14,535,076	2%	3.53%	14,421,165	776,363
Total Program Indirect Rate						16.47%	15.71%
Tot Exp. per Sources and Uses File	390,710,819	388,646,200	424,393,634				
Overall Proof	390,710,819	386,827,478	423,894,083				
Anticipated cuts	-	(1,796,554)	(500,000)				
Variance	-	22,168	(449)				
Final Variance						0.00%	

Appendix C: Board Resolution

Board Resolution: FY 2023 MTW Plan

HOUSING AUTHORITY OF BALTIMORE CITY

A Resolution of the Board of Commissioners Approving the Moving to Work Annual Plan for Fiscal Year 2023, the Housing Choice Voucher Program Administrative Plan for Fiscal Year 2023, and the Public Housing Admissions and Continued Occupancy Policies for Fiscal Year 2023

WHEREAS Section 204 of the Omnibus Consolidated Rescissions and Appropriations Act of 1996 (Pub. L. 104-134) established the 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 2023 (the “**FY 2023 Annual Plan**”) consistent with the terms and objectives of the MTW Restated Agreement; and

WHEREAS the Baltimore City Department of Housing and Community Development has certified that the activities proposed in the 2023 Annual Plan are consistent with the City’s Consolidated Plan per HUD requirements; and

WHEREAS HABC met with the Resident Advisory Board to review the draft FY 2023 Annual Plan and gather input from the resident body; and

WHEREAS on September 8, 2022, HABC made the FY 2023 Annual Plan, including revisions to the FY 2023 Administrative Plan and revisions to the FY 2023 ACOF, 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 at least thirty (30) days; and

WHEREAS on October 3, 2022, HABC held a public hearing at Pleasant View Gardens to receive comments from the Community on the FY 2023 Annual Plan; and

WHEREAS in accordance with the MTW Restated Agreement, HABC has duly considered the comments received in response to the FY 2023 Annual Plan, and upon approval the HABC Board of Commissioners (the “**Board**”), HABC will submit its FY 2023 Annual Plan and Certifications to HUD for approval.

Page 1 of 2


Bd. Reso. FY 2023 MTW Annual Plan
October 2022

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


1. The FY 2023 Annual Plan is hereby approved and HARC is authorized to submit the FY 2023 Annual Plan to HUD.
2. The FY 2023 HCVP Administrative Plan is hereby approved.
3. The FY 2023 ACOP is hereby approved.
4. The FY 2023 Annual Plan Certifications of Compliance with Regulations (the "Certifications") are hereby adopted and the Chairperson is authorized to execute the Certifications on behalf of the Board; and
5. The President/CEO, or designee, is hereby authorized to take any and all appropriate actions and execute all appropriate documents to carry out this Resolution consistent with its terms.

PASSED, ADOPTED AND APPROVED this 18th day of October 2022.

ATTEST:



Janet Abrahams
Secretary/President/CEO



Robin Carter
Chairperson

Approved as to form and legal sufficiency
on this 10th day of October 2022 by:



Jan Goslee, EVP/General Counsel

Appendix D: Certification of Compliance

OMB Approval No. 2577-0216 (exp. 3/31/2024)

CERTIFICATIONS OF COMPLIANCE
<p>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</p>
<p>Acting on behalf of the Board of Commissioners of the Moving to Work Public Housing Agency (MTW PHA) listed below, as its Chair or other authorized MTW PHA official if there is no Board of Commissioners, I approve the submission of the Annual Moving to Work Plan for the MTW PHA Plan Year beginning (01/01/2023), 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:</p>
<p>(1) The MTW 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 MTW PHA conducted a public hearing to discuss the Plan and invited public comment.</p>
<p>(2) The MTW 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.</p>
<p>(3) The MTW 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 (or successor form as required by HUD).</p>
<p>(4) The MTW 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.</p>
<p>(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.</p>
<p>(6) The Plan contains a certification by the appropriate state or local officials that the Plan is consistent with the applicable Consolidated Plan.</p>
<p>(7) The MTW PHA will affirmatively further fair housing by fulfilling the requirements set out in HUD regulations found at Title 24 of the Code of Federal Regulations, including regulations in place at the time of this certification, and any subsequently promulgated regulations governing the obligation to affirmatively further fair housing. The MTW PHA is always responsible for understanding and implementing the requirements of HUD regulations and policies, and has a continuing obligation to affirmatively further fair housing in compliance with the 1968 Fair Housing Act, the Housing and Community Development Act of 1974, The Cranston-Gonzalez National Affordable Housing Act, and the Quality Housing and Work Responsibility Act of 1998. (42 U.S.C. 3608, 5304(b)(2), 5306(d)(7)(B), 12705(b)(15), and 1437C-1(d)(16)). The MTW PHA will affirmatively further fair housing by fulfilling the requirements at 24 CFR 903.7(o) and 24 CFR 903.15, which means that it will take meaningful actions to further the goals identified in its Analysis of Impediments to Fair Housing Choice(AI),Assessment of Fair Housing (AFH), and/or other fair housing planning documents conducted in accordance with the requirements of 24 CFR Part 5, that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing, and that it will address fair housing issues and contributing factors in its programs, in accordance with 24 CFR 903.7(o), and will address impediments to fair housing choice identified in its AI, AFH, and/or other fair housing planning documents associated with any applicable Consolidated or Annual Action Plan under 24 CFR Part 91.</p>
<p>(8) The MTW PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975 and HUD's implementing regulations at 24 C.F.R. Part 146.</p>
<p>(9) In accordance with 24 CFR 5.105(a)(2), HUD's Equal Access Rule, the MTW PHA will not make a determination of eligibility for housing based on sexual orientation, gender identity, or marital status.</p>
<p>(10) The MTW 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.</p>
<p>(11) The MTW 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 75.</p>

form HUD 50900: Certifications of Compliance (3/2021)

- (12) The MTW PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.
- (13) The MTW 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.
- (14) The MTW 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.
- (15) The MTW PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
- (16) The MTW 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 MTW 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.
- (17) With respect to public housing and applicable local, non-traditional development the MTW 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.
- (18) The MTW PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.
- (19) The MTW PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.
- (20) The MTW PHA will comply with the policies, guidelines, and requirements of 2 CFR Part 225 (Cost Principles for State, Local and Indian Tribal Governments) and 2 CFR Part 200.
- (21) The MTW PHA must fulfill its responsibilities to comply with and ensure enforcement of Housing Quality Standards, as defined in 24 CFR Part 982 or as approved by HUD, for any Housing Choice Voucher units under administration.
- (22) The MTW 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.
- (23) 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 MTW PHA in its Plan and will continue to be made available at least at the primary business office of the MTW PHA.


Housing Authority of Baltimore City (HABC)
MTW PHA NAME

MD002
MTW PHA NUMBER/HA CODE

I/We, the undersigned, certify under penalty of perjury that the information provided above is true and correct. WARNING: Anyone who knowingly submits a false claim or makes a false statement is subject to criminal and/or civil penalties, including confinement for up to 5 years, fines, and civil and administrative penalties. (18 U.S.C. §§ 287, 1001, 1010, 1012; 31 U.S.C. §3729, 3802).

Robin Carter
NAME OF AUTHORIZED OFFICIAL

Chairperson, Board of Commissioners
TITLE


SIGNATURE

10/18/2022
DATE

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

Appendix E: Certification of Consistency with Consolidated Plan

OMB Approval No. 2508-0214 (Exp. 2/28/2022)

Certification of Consistency with the Consolidated Plan

U.S. Department of Housing and Urban Development

I certify that the proposed activities/projects in the application are consistent with the jurisdiction's current, approved Con (Type or solidated Plan. clearly print the following information:)

ApplicantName: Housing Authority of Baltimore City

ProjectName: HABC - Moving to Work Annual Plan FY 2023

Location of the Project: Baltimore, MD. The development and implementation of affordable housing and economic development initiatives in Baltimore in accordance with the City's Consolidated Plan.

Name of the Federal Program to which the applicant is applying: HUD - Moving to Work Demonstration

Name of Certifying Jurisdiction: Baltimore City Department of Housing & Community Development

Certifying Official of the Jurisdiction Name: Mary Correia

Title: Deputy Commissioner, Consolidated Planning

Signature: Mary Correia

Date: September 6, 2022

Appendix F: Public Process Documentation

Copy of the Newspaper Advertisement placed in the Daily Record:
September 8th, 9th and 10th 2022

**HOUSING AUTHORITY OF BALTIMORE CITY (HABC)
NOTICE OF 30-DAY COMMENT PERIOD FOR THE
FY 2023 ANNUAL PLAN AND CERTAIN HABC DOCUMENTS**

The following HABC documents are now available to the public for review and comment on HABC's website at <https://www.habc.org/habc-information/plans-reports-policies/plans-reports-policies/>:

1. The FY 2023 MTW Annual Plan;
2. The FY 2023 Housing Choice Voucher Administrative Plan (the HCVP Admin Plan);
3. A Summary of Changes to the FY 2023 HCVP Admin Plan;
4. The FY 2023 Public Housing Admissions & Continued Occupancy Policies (ACOP); and
5. A Summary of changes to the FY 2023 ACOP

HABC will hold an in-person public meeting on Monday, October 3, 2022 in the Auditorium at Pleasant View Gardens, 201 N. Aisquith Street, at 5:00 p.m. 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 MTW Plan for fiscal year 2023, and on HABC's proposed 2023 HCVP Admin Plan and proposed 2023 Public Housing ACOP.

Printed copies of these documents can be made available at HABC's Main Office located at 417 E. Fayette Street, 13th Floor Baltimore, MD 21202. Please call Ms. Jeannine Dunn at 410-545-1680 to make arrangements to review the proposed documents. Printed copies of the proposed documents can also be obtained at HABC's Rental & Assisted Housing Office, 1225 W. Pratt Street, Baltimore MD, 21223 and at all HABC-owned public housing development management offices.

The deadline to submit all comments is October 10, 2022.

Comments on the proposed FY 2023 MTW Annual Plan, as well as the proposed 2023 HCVP Admin Plan and proposed 2023 Public Housing ACOP can be submitted to HABC by:

1. Attending the public meeting at Pleasant View Gardens on October 10, 2022 and signing up on-site to make a public comment;
2. Email to Jeannine Dunn at Jeannine.Dunn@habc.org; and/or
3. First-class mail, Attention Jeannine Dunn to:
Housing Authority of Baltimore City
417 E. Fayette Street – 13th Floor
Baltimore, Maryland 21202

Baltimore Sun Sep. 8, 9, 10 7281040

Appendix G: Public Hearing: Comments Received on the FY 2023 Annual Plan

No	COMMENT RECEIVED	HABC RESPONSE
Comments/Questions Regarding the FY 2023 Annual MTW Plan & Other General Comments		
1.	<p><u>Submitted in writing by Kane V. Levings, Disability Rights Maryland (DRM)</u></p> <ul style="list-style-type: none"> The Plan does not specify the number of UFAS units available and does not account for UFAS units constructed pursuant to the Bailey Consent Decree that may be demolished as part of a repositioning strategy. 	<p>No change to the Annual Plan.</p> <ul style="list-style-type: none"> HABC is ensuring that 7% mobility UFAS units are created for new construction and that the required number of UFAS units are being preserved and renovated for sites undergoing rehabilitation.
2.	<p><u>Submitted in writing by Kane V. Levings, DRM</u></p> <ul style="list-style-type: none"> HABC has not adequately explained why it will not pursue Faircloth to RAD opportunities. 	<p>No change to the Annual Plan.</p> <ul style="list-style-type: none"> HABC believes we have adequately explained why we will not be pursuing Faircloth to RAD.
3.	<p><u>Submitted in writing by Kane V. Levings, DRM</u></p> <ul style="list-style-type: none"> The redevelopment of Poe Homes will impact the availability of affordable accessible housing for persons with disabilities by demolishing 22 UFAS units. The Bailey Consent Decree requires 7% of all new construction at Poe to be UFAS accessible, and HABC must ensure certain protections for these units for them to count towards its Bailey obligations. 	<p>No change to the Annual Plan.</p> <ul style="list-style-type: none"> HABC will continue to comply with the Bailey Consent Decree as we move forwards with plans to redevelop Poe Homes.
4.	<p><u>Submitted in writing by Kane V. Levings, DRM</u></p> <ul style="list-style-type: none"> RAD conversions practices should be documented in HABC policy, and HABC should ensure that all future RAD conversions adhere to requirements under the Bailey Consent Decree. 	<p>No change to the Annual Plan.</p> <ul style="list-style-type: none"> HABC continues to comply with the Bailey Consent Decree and its requirements for all RAD conversions.
5.	<p><u>Submitted in writing by Kane V. Levings, DRM</u></p>	<p>No change to the Annual Plan.</p>

No	COMMENT RECEIVED	HABC RESPONSE
	<ul style="list-style-type: none"> HABC plans to demolish or dispose of up to 1,172 units in 2023, but only plans to acquire 348 new PBV units. What is HABC's plan to replace the remaining units? 	<ul style="list-style-type: none"> Of the 1,172 units listed in Table 2, up to 415 units at Perkins Homes will be demolished and replaced as part of the PSO Transformation Plan. An additional 288 units are at Poe Homes, which will be redeveloped, and another 297 of these units represent RAD conversions that are planned to close in 2023. HABC is not required to replace public housing units unless there is a specific legislative/grant requirement.
6.	<p><u>Submitted in writing by Kane V. Levings, DRM</u></p> <ul style="list-style-type: none"> HABC plans to demolish or sell an unknown amount of Scattered Site units. What is HABC's plan to preserve the affordability of units sold to Baltimore City? 	<p>No change to the Annual Plan.</p> <ul style="list-style-type: none"> Scattered site units that are sold to Baltimore City become part of the City's revitalization efforts.
7.	<p><u>Submitted in writing by Kane V. Levings, DRM</u></p> <ul style="list-style-type: none"> Of the 348 anticipated new PBV units, how will HABC prioritize broad ranges of family sizes and UFAS units? 	<p>No change to the Annual Plan.</p> <ul style="list-style-type: none"> The anticipated new PBV units will be developed in accordance with the need for bedroom sizes as determined by the waiting list, and UFAS units will be created in accordance with Federal requirement and the Bailey Consent Decree as applicable.
8.	<p><u>Submitted in writing by Kane V. Levings, DRM</u></p> <ul style="list-style-type: none"> The change to the MTW Homeownership Program to provide broader access to households only earning SSI income is a good addition to the program. 	<ul style="list-style-type: none"> No change to the Annual Plan.
9.	<p><u>Submitted in writing by Kane V. Levings, DRM</u></p> <ul style="list-style-type: none"> Under the Bailey Long-Term Affordable PBV Contract activity, are the 286 LTA NED units new in FY23 or the total number of units in HABC's portfolio by the end of 2023? What is HABC's plan to add more Bailey LTA PBV units to the portfolio? What is the plan to ensure more UFAS units are added to the available units? 	<p>No change to the Annual Plan.</p> <ul style="list-style-type: none"> Under the Bailey Long-Term Affordable PBV Contract activity, 286 represents the total number of LTA NED units by the end of 2023. HABC intends to comply with Bailey Consent Decree and applicable federal laws concerning creation of UFAS units.
10.	<p><u>Submitted in writing by Kane V. Levings, DRM</u></p> <ul style="list-style-type: none"> How does HABC anticipate the needs of public housing residents with medical conditions exacerbated by 	<p>No change to the Annual Plan.</p> <ul style="list-style-type: none"> As HABC learns of unit conditions and/or a household's medical needs, we respond by taking appropriate action within the unit and/or relocating the household as appropriate.

No	COMMENT RECEIVED	HABC RESPONSE
	environmental factors? HABC should consider expanding the Healthy Opportunities Program to public housing residents.	
11.	<u>Submitted in writing by Kane V. Levings, DRM</u> <ul style="list-style-type: none"> Why does HABC believe it is necessary to revise uniform documents promulgated by HUD that have already been vetted for legal sufficiency? 	No change to the Annual Plan. <ul style="list-style-type: none"> HABC believes it is necessary to revise certain documents to extend authorization periods to meet the terms of MTW activities.
12.	<u>Submitted in writing by Kane V. Levings, DRM</u> <ul style="list-style-type: none"> HABC should implement the SAFMR final rule. 	No change to the Annual Plan. <ul style="list-style-type: none"> HABC has implemented a modified Rent Reasonableness Policy to include rent changes that are applied to submarkets which are in line with current market rents and payment standards.
13.	<u>Submitted in writing by Kane V. Levings, DRM</u> <ul style="list-style-type: none"> What is the plan to complete the remaining units under the Bailey 10 Total Development Cost Limit Policy? 	No change to the Annual Plan. <ul style="list-style-type: none"> HABC will continue to screen available properties, seek HUD approval and continue our efforts to acquire them if approved.
14.	<u>Submitted in writing by Kane V. Levings, DRM</u> <ul style="list-style-type: none"> The outcomes for families in the Choice Mobility program should be tracked and evaluated. HABC should develop a mobility program for these families. 	No change to the Annual Plan. <ul style="list-style-type: none"> HCVP tracks Choice Mobility participants and monitors leasing. HABC has released an RFP for mobility counseling for this program.
15.	<u>Submitted in writing by Kane V. Levings, DRM</u> <ul style="list-style-type: none"> How many of the RAD units noted in Table 16 will be UFAS units? 	No change to the Annual Plan. <ul style="list-style-type: none"> The number of UFAS units will be based on federal requirements and the Bailey Consent Decree as applicable.
16.	<u>Submitted verbally at Public Meeting by Jack Resnick, Platinum Reality</u> <ul style="list-style-type: none"> The landlord incentives are exciting to see, but the day-to-day inefficiencies and customer service of the voucher program needs to be addressed. The biggest issue is the time it takes once a unit passes inspection until the leasing department receives that pass report, which can take up to 30 days. Is anything 	No change to the Annual Plan. <ul style="list-style-type: none"> HABC continues to evaluate program performance on a day-by-day basis and make adjustments as needed. Average leasing timeframes from RFTA submission to lease signing is 30-45 days. HABC strives to reduce that timeframe, however it is contingent on owners submitting all required documentation upon request, or within a reasonable timeframe. Barriers include units not passing inspection on the first attempt, failure to register properties with the City, failure to current/valid Lead certificates, and delays in acquiring valid proof of ownership. We continue to look for ways to streamline processes, timelines and efficiencies

No	COMMENT RECEIVED	HABC RESPONSE
	being done about the efficiency of the forward-facing staff and is HCVP focused on cutting down the process move timeline from an average of 30-45 days to two weeks?	while ensuring that federal statutory requirements and state and local laws are met.
17.	<u>Submitted in writing by Jermarne Walker</u> <ul style="list-style-type: none"> The Public Housing and HCVP waiting lists should be opened now. 	<ul style="list-style-type: none"> No change to the Annual Plan.
18.	<u>Submitted in writing by Jermarne Walker</u> <ul style="list-style-type: none"> HABC should stop looking at gross income to determine rent and look at net instead. 	<p>No change to the Annual Plan.</p> <ul style="list-style-type: none"> HABC is required by Federal regulations to use gross income to determine subsidy amounts.
Comments regarding the 2023 ACOP		
19.	<u>Submitted in writing by Kane V. Levings, DRM</u> <ul style="list-style-type: none"> Sections 3.3-3.4: The various iterations of the site-based waiting list are confusing and are likely to result in the removal of families from the waiting list without HABC providing housing. Under 24 CFR, HABC is required to take reasonable measures to assure that adoption of site-based waiting lists is consistent with affirmatively furthering fair housing and to review its site-based waiting list policy to determine if it is consistent with civil rights laws. Baseline data is necessary for HABC to evaluate the effects of changes to waiting list policy. 	<p>No change to the ACOP.</p> <ul style="list-style-type: none"> The comment that HABC is implementing a site-based waiting list is incorrect. HABC transitioned from a community-wide centralized waiting list to a Centrally Administered Location Based Waiting List and a Centrally Administered First Available Waiting List. This is consistent with the duty to affirmatively further fair housing because 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 location and will have awareness of the availability. Further, the high ratio of rejections to acceptances of offers that HABC experienced with the community-wide waiting list created a slower process for leasing eligible applicants. HABC believes that the centrally administered Location Based and First Available waiting lists significantly reduce the high number of rejections of units offers, thereby providing a more efficient and timely process for both HABC and applicants.
20.	<u>Submitted in writing by Kane V. Levings, DRM</u> <ul style="list-style-type: none"> Section 10.24, Rent Adjustments for Transferred Residents: Is a public housing resident who moves from traditional public housing to a privately owned public housing site treated as a new admission who must undergo 	<p>No change to the ACOP.</p> <ul style="list-style-type: none"> Residents who are transferred are not re-screened, but income is updated and verified.

No	COMMENT RECEIVED	HABC RESPONSE
	the screening process a second time? If yes, this is a violation of the Bailey Supplemental Consent Decree.	
21.	<p><u>Submitted in writing by Kane V. Levings, DRM</u></p> <ul style="list-style-type: none"> 15.4 Additional Authorized Reasons for Termination: HABC removed “during the household’s current public housing tenancy” and did not provide a basis for this modification. If a resident engaged in an activity before the current tenancy, but was approved for residency, the activity should not be reason for termination. 	<p>No change to the ACOP.</p> <ul style="list-style-type: none"> This section of the matrix of changes was inadvertently included in error. Currently, Section 15.4 of the ACOP does not contain the language shown in the matrix as removed. Therefore, since no language is being removed, there is no language to keep pursuant to this comment, and no modification will be made to Section 15.4. Moreover, the language is unnecessary because if such conduct occurred before the tenancy was created, then it is not a violation of the subsequent lease that created the tenancy.
Comments regarding the 2023 Administrative Plan		
22.	<p><u>Submitted in writing by Kane V. Levings, DRM</u></p> <p>3.4 Closing the Waiting List: What are the criteria HABC will follow in decided to keep the waiting list open for certain preferences? If the waiting list is closed, except for preferences, how will an applicant submit an application? If an applicant does not meet the criteria for any preferences, how will they know that their application was discarded?</p>	<p>No change to the Administrative Plan.</p> <ul style="list-style-type: none"> HABC monitors our waiting list continuously and will open as appropriate. Applications for HCVP Waiting List may be completed online on HABC’s website. If an applicant does not meet the preference for the waiting list that they are applying for, the form will not allow them to move forward with the application.
23.	<p><u>Submitted in writing by Kane V. Levings, DRM</u></p> <p>3.5 Applicant State While on Waiting List: HABC should allow applicants to update changes to their application by telephone or mail in addition to online or at the kiosk.</p>	<p>No change to the Administrative Plan.</p> <ul style="list-style-type: none"> HABC currently accepts changes while on the waiting list via phone, email, in writing via postal mail, online and online at the kiosk.
24.	<p><u>Submitted in writing by Kane V. Levings, DRM</u></p> <p>3.7.1 Requirement to Attend Interview: Removal of an opportunity for informal review creates a barrier to HABC’s duty to affirmatively further fair housing. HABC must review Reasonable Accommodation requests if the</p>	<p>No change to the Administrative Plan.</p> <ul style="list-style-type: none"> HABC currently considers Reasonable Accommodations prior to any denial or withdrawal. In addition, anyone who misses an interview has an opportunity to request reinstatement within 12 months.

No	COMMENT RECEIVED	HABC RESPONSE
	reason for missing the interview is related to an applicant’s disability.	
25.	<p><u>Submitted in writing by Kane V. Levings, DRM</u> 3.9 Final Determination of Eligibility: HABC should notify applicants in writing and by phone call of their eligibility and mandatory voucher briefing.</p>	<p>No change to the Administrative Plan.</p> <ul style="list-style-type: none"> HABC notifies applicants of their denial via written letter sent through USPS; HCVP notifies applicants of their voucher briefing dates in writing via USPS and/or via telephone calls and emails
26.	<p><u>Submitted in writing by Kane V. Levings, DRM</u> 8.6.1 Expirations/Extensions: If a family submits a written request for reinstatement within 30 days of the final expiration date, and HABC denies the request, will the written decision include the reasons for denial? A hearing should be included.</p>	<p>No change to the Administrative Plan.</p> <ul style="list-style-type: none"> HABC will provide notification in writing of the decision on the reinstatement request that includes the reason for denial (require search records and a written statement as to why they could not lease up within the initial timeframes). HABC reviews all requests on a case-by-case basis. HABC is not required to respond or offer an opportunity for informal hearing on expired vouchers.
27.	<p><u>Submitted in writing by Kane V. Levings, DRM</u> 8.8.1 Special Program/Preference – Voucher Retention for Remaining Members of Participant Family: If a remaining member is eligible for a TBV, will they receive the voucher immediately or just be placed on the waiting list?</p>	<p>No change to the Administrative Plan.</p> <ul style="list-style-type: none"> Remaining household members will continue to be assisted.
28.	<p><u>Submitted in writing by Kane V. Levings, DRM</u> 10.10 Determination of Responsibility: If a family is deemed responsible for HQS deficiencies and the deficiency is due to a family member’s disability, HABC must consider any Reasonable Accommodation request submitted by the family. HABC should adjust the consequences to fit the needs of a family with a disability.</p>	<p>No change to the Administrative Plan.</p> <ul style="list-style-type: none"> HABC considers all Reasonable Accommodation requests prior to any action leading to denial, termination, or withdrawal.
29.	<p><u>Submitted in writing by Kane V. Levings, DRM</u> 11.4.1 Rent Reasonableness Methodology: Where is the data for the new process to determine reasonable rents coming from? How often is HABC adjusting the</p>	<p>No change to the Administrative Plan.</p> <ul style="list-style-type: none"> Data is coming from a rent reasonableness study conducted by an independent contractor. HABC reviews the rental market annually and adjusts rents to meet market conditions and remain competitive.

No	COMMENT RECEIVED	HABC RESPONSE
	<p>reasonable rents to match the data to remain competitive in the market? What is HABC’s process when an owner does not accept the first rent offer? Will HABC negotiate with the owner without the family’s request? Shortening leasing timeframes would decrease a tenant’s housing security and stability. What is HABC’s minimum lease term?</p>	<ul style="list-style-type: none"> • Owners are asked to provide rental comparisons for similar size unit with similar amenities that are located within a 0.5 mile radius of the subject unit; for multi-dwelling units a rent roll is requested. HABC then uses various external platforms to compare rents of similar units. • HABC negotiates with owners without the family’s request. • HCVP’s leasing terms are a minimum of one year and a maximum of two years.
30.	<p><u>Submitted in writing by Kane V. Levings, DRM</u> 11.8 Landlord Leasing Incentives: HABC should put more emphasis on leasing with landlords that have accessible units.</p>	<p>No change to the Administrative Plan.</p> <ul style="list-style-type: none"> • HABC has applied an \$500 incentive directly requesting new and accessible units.
31.	<p><u>Submitted in writing by Kane V. Levings, DRM</u> 12.3 Interim Reexaminations: An option to request an interim by phone call or in person should be added.</p>	<p>No change to the Administrative Plan.</p> <ul style="list-style-type: none"> • HABC does and has accepted interim requests through various methods including online, by phone, in writing and in-person.
32.	<p><u>Submitted in writing by Kane V. Levings, DRM</u> 13.4.5 Required Moves for Health and Safety Reasons: The addition of a requirement to submit a Notice to Vacate puts the family at risk of eviction, as the owner could file a Tenant Holding Over Complaint. This new requirement should be removed.</p>	<p>No change to the Administrative Plan.</p> <ul style="list-style-type: none"> • HABC participants who need an emergency transfer due to health/safety reasons will be required to submit a Notice to Vacate (30- or 60-days).
33.	<p><u>Submitted in writing by Kane V. Levings, DRM</u> 15.4.2 Absence Due to Medical Reasons: HABC should more carefully review federal regulations on the issue of absence from unit in relation to termination of assistance from the unit versus grounds for a participant’s termination from the program. Families should be given an opportunity for a hearing if they did not receive notice of termination because of absence for reasons related to their disability.</p>	<p>No change to the Administrative Plan.</p> <ul style="list-style-type: none"> • 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 permanently absent. If the verification indicates that the family member will return in less than one hundred and eighty (180) consecutive days, the family member will not be considered permanently absent. • 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.

No	COMMENT RECEIVED	HABC RESPONSE
		<ul style="list-style-type: none"> • A person with a disability may request an extension of time before termination as an accommodation, subject to approval by the Senior Vice President or designee. • 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.
34.	<p><u>Submitted in writing by Kane V. Levings, DRM</u> 15.7 Family Obligations: Reasonable Accommodation requests must be reviewed, and options discussed to see if any accommodation would help the family with a disability that is the cause of the failure to maintain housekeeping responsibilities.</p>	<p>No change to the Administrative Plan.</p> <ul style="list-style-type: none"> • HABC considers all Reasonable Accommodation requests prior to any action leading to denial, termination, or withdrawal.

Attendees at Public Hearing: October 3, 2022



Public Meeting for the FY 2023 Annual Plan

ATTENDANCE SHEET – PLEASE SIGN IN

Name	Address or Email	Organization/Development	Phone Number
Samir Abrahams	417 Fayette St 13 th block	HABC	
Jan Goslee	417 E. Fayette 12 th Fl	HABC	
Sherman Smith	McCulloch Homes	HABC	413 326-7275
Angela Cameron	417 E Fayette St Suite 240	HABC	
Norman Young	1225 Pratt Street	HABC	
Michael [unclear]	417 E. Fayette	HABC	
Henry Johnson	"	"	
Shannon Peterson	1225 W Pratt St	HABC	
Eric Turner	"	"	
Michael Woods	417	HABC - ECI	6-8468
Jack Knick	Jack @ platinumrealtypub.org	Platinum Realty	443-310-4583

October 3, 2022



Public Meeting for the FY 2023 Annual Plan

ATTENDANCE SHEET – PLEASE SIGN IN

Name	Address or Email	Organization/Development	Phone Number
M Serena Campbell	Serena.Campbell@habc.org	HABC/HCUP	443.984.2247
LAVEDA Stucky	laveda_stucky@habc.org	ACVD	443-
Kane Levings	kane@disabilityrightsmd.org	PRM	
Abraham Schwab	Abraham@casallepark.org	LPR Management	667 602 8520
John Wilson	417 E. Fayette Street 4th Fl	HABC	
Marisa Watkins	417 E Fayette Street 13th Fl	HABC	
Blanca Carrasquillo	Blanca.Carrasquillo@habc.org	HABC	
Ingrid Antonio	417 E. Fayette St 12th Fl	HABC	

October 3, 2022



Empowerment. Integration. Equality.

1500 Union Ave., Suite 2000, Baltimore, MD 21211
www.DisabilityRightsMD.org

VIA ELECTRONIC SUBMISSION

October 11, 2022

Jeannine Dunn
Housing Authority of Baltimore City
417 E. Fayette Street
Baltimore, MD 21201
Jeannine.Dunn@habc.org

RE: Comments to 2023FY Housing Authority of Baltimore City, MTW Annual Plan, Administrative Plan, and ACOP

Ms. Dunn:

Thank you for the opportunity to comment on the Housing Authority of Baltimore City (HABC)'s Moving to Work Annual Plan, Administrative Plan, and The Admissions and Continued Occupancy Policy (ACOP). Disability Rights Maryland (DRM) is Maryland's designated protection and advocacy organization mandated to advance the civil rights of persons with disabilities. DRM works to increase opportunities for Marylanders with disabilities to be party of their communities and live in safe, decent, secure, affordable, and accessible housing. DRM submits these following comments.

Annual Plan Comments

The Annual Plan Lacks Transparency on the Number of Accessible Housing Opportunities for Persons with Disabilities

The Annual Plan lacks transparency in the number of UFAS units available to persons who need the features of the unit. While HABC's Annual Plan accurately reports that the *Bailey* Consent Decree requires the construction, certification, and leasing of 756 UFAS Accessible Units, the Plan does not account of HABC's repositioning strategy that frequently results in the demolition or disposition of UFAS Accessible Units that were constructed pursuant to *Bailey* and HABC's plan to create and maintain an inventory of Accessible Units. For example, the Annual Plan notes HABC's intention to sell two UFAS units at 168 Kossuth St. and 2410 Elsinore St., but makes no evaluation of how the disposition of these units and the fact they would no longer be available for leasing to households on HABC's waiting-list, HABC's overall program accessibility.

Similarly, taking whole projects off-line to redevelop the sites impairs the accessibility of HABC's programs over a period of years, such as has occurred at Perkins Homes, and could potentially occur at Oswego and Poe Homes. This impacts the usability of HABC's programs for families with disabilities.

HABC Has Not Adequately Explained Why It Won't Pursue Fair-Cloth to RAD Opportunities

HABC could develop over 6000 units of affordable housing under its Faircloth limit, and HUD has authorized PHAs to convert housing to RAD to avoid the funding instability that has historically accompanied the public housing program. However, HABC appears to be foregoing these opportunities for reasons related to its MTW Agreement that is unclear to the community.

Other PHAs operating under MTW Agreements have been able to pursue Faircloth to RAD opportunities.¹ The projects typically require the PHA to use its MTW authority to supplement rents from the RAD conversion with MTW funds in a new or substantially rehabbed project. We are unaware of any analysis undertaken that would show that a similar approach in Baltimore City is infeasible. The need for affordable housing is so severe that bypassing the opportunity to create over 6000 units of affordable housing deserves more transparency and consultation with the community and stakeholders.

HABC should publicly explain its choice to not pursue Faircloth to RAD and should publicly disclose the factual basis for this decision.

Poe Homes Choice Neighborhoods Initiative

The Poe Homes Choice Neighborhoods Initiative, which will almost certainly entail the demolition of the Poe Homes Project and redevelopment of new housing, will impact the availability of affordable and accessible housing units for persons with disabilities by demolishing 22 UFAS units at Poe Homes.

Additionally, pursuant to the *Bailey* Consent Decree, any new construction that occurs at the Poe Homes site will require that 7% of all newly constructed housing will be UFAS accessible. Further, HABC must ensure certain protections in the UFAS units in order for these units to count toward HABC's obligations under the *Bailey* Consent Decree. These protections, such as prohibitions on site based waiting-lists, centralization of reasonable accommodation policies and procedures, adherence to the Long Term Affordability (LTA Criteria) and other policies are memorialized in the *Bailey* Supplement Consent Decree, and most recently a Notice of Continuing Implementation.

Routine RAD Conversion Practices Should Be Memorialized in HABC Policy

As a matter of policy, HABC should ensure that all future RAD conversions adhere to the policy requirements established under the *Bailey* Supplemental Decree. These policies have had the effect of increasing fair housing opportunities for people with disabilities, and HABC should, as a matter

¹https://www.hud.gov/press/press_releases_media_advisories/hud_no_22_085#:~:text=About%20Faircloth%2Dt o%20RAD&text=A%20Faircloth%2Dto%20RAD%20strategy,development%20of%20affordable%20rental%20home s

of course, require all future RAD conversions to comply with requirements established initially under the *Bailey* Supplemental Decree.

Comments on Specific Policies

Pg. 7: HABC plans to demolish or dispose up to 1,172 units in FY 2023, but only plans to acquire 348 new PBV units. What is HABC's plan to replace the remaining units?

Pg. 29: HABC plans to demolish or sell an unknown amount of Scattered Sites inventory. For inventory sold, what is HABC's plan to preserve the affordability of the units sold to Baltimore City?

Rising rental costs – HABC should implement SAFMR final rule in order to better capture rent standards in each zip code.

Pg. 42: Of the 348 anticipated new PBV units, how will HABC prioritize a broad range of family sizes and UFAS units?

Pg. 54: The changes to the MTW Homeownership Program to provide broader access to households only earning SSI income is a good addition to the program.

Pg. 57: Bailey Long-Term Affordable Project-Based Voucher Contract
Are the 286 LTA NED units new in FY23 or the total number of LTA NED units in HABC's portfolio by the end of FY23?

What is HABC's plan to add more Bailey LTA PBV units to the portfolio? What is the plan to ensure more UFAS units are added to the available units?

Pg. 74: The Health Opportunities Program (HOP) sounds like a great program. How does HABC anticipate addressing the needs of residents in HABC public housing with medical conditions, such as asthma, that is exacerbated by environmental factors? HABC should consider expanding opportunities in HOP program to residents of public housing whose medical conditions are exacerbated by residing in public housing.

Pg. 76: Why does HABC believe it is necessary to revise uniform documents promulgated by HUD that have already been vetted for legal sufficiency? This seems like reinventing the wheel, and the cost savings associated with these activities seem miniscule and the documents will not have been vetted for legal sufficiency from the United States Department of Housing and Urban Development – potentially exposing HABC to liability on its regulatory obligations. Overall this appears a duplicative and redundant exercise.

Pg. 77: HABC should implement SAFMR final rule rather than reinvent a rule that has the same intent and purpose can be satisfied by implementing the SAFMR rule proposed by HUD.

Pgs. 79-80: Bailey 10 Total Development Cost Limit Policy – What is HABC’s plan to complete the remaining units? The plan description was vague and included no timeline on when HABC expects to complete the remaining, required units for Bailey.

Pg. 107: Choice Mobility under RAD should be tracked. The outcomes for families under the Choice-Mobility feature should be tracked and evaluated as to whether the Choice-Mobility feature advances housing choice for residents of RAD converted properties. As HABC converts more of its public housing over to RAD, the number of households accepting choice mobility will increase. To affirmatively further fair housing, HABC should develop a mobility program for families who elect to move from public housing and RAD converted housing that provides robust tenant’s rights, to a voucher program that will include more financial and programmatic responsibilities, and to encourage families to reside in areas of opportunity. At a minimum, HABC should be able to identify the housing outcomes for families who elect Choice-Mobility vouchers.

Pg. 110-111: Table 16: How many of the RAD units noted in Table 16 will be UFAS units?

ACOP Comments

3-3 thru 3-4 generally:

Simply stated, the various iterations of the sited based waiting-list scheme that HABC has developed is so confusing and will be incomprehensible to families. It is more likely these revisions will remove more families from the waiting-list without HABC actually providing or offering housing. HABC’s proposed site based waiting-list attempts to shift the risk of delay and mismatching of units and individuals to applicant families. These likely delays in accessing HABC’s housing programs erects an unnecessary barrier to housing choice in violation of HABC’s duty to affirmatively further fair housing. While HABC may respond that the proposed alternative community-wide ‘first-available’ waiting-list should alleviate these concerns, its proposal for alternative community-wide waiting-list betrays the need for a community-wide waiting list to timely and adequately address the needs of applicants. Additionally, pursuant to 24 CFR § 903.7(b)(2)(iv), (v) HABC is required to take “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.” In order for HABC to meet its obligations under these regulations, HABC must first have a baseline of information to properly monitor and review its waiting list policies. Without such a baseline, HABC cannot make the types of assurances required by the law that it has measured to affirmatively further fair housing. Data is necessary for HABC to evaluate the effects of changes to its waitlist policies. HABC has failed to conduct any analysis as to the demographic composition of its current waitlist. As such, HABC will be unable to determine whether changes in the composition of its properties is the product of violations of its civil rights obligations. HABC has only provided a minimal amount of data that presents an incomplete picture of its present housing program. Without additional information, HABC will be unable to appropriately review its policies as required by 24 CFR § 903.7(b)(2). And will be unable to ensure that its policies,

practices, and procedures affirmatively further fair housing and are consistent with its civil rights obligations. HABC should drop its proposed site-based waiting-list scheme.

10.24: Rent Adjustments for Transferred Residents

DRM requests clarification that if a public housing resident who moved from traditional public housing to a privately owned public housing site being treated as a new admission means that the resident must undergo the screening process a second time. If yes, DRM would object to such policy as a violation of *Bailey Supplemental Consent Decree* at para 33(i).

15.4: Additional Authorized Reasons for Termination

HABC failed to provide a basis for the modification to this section. HABC removed “during the household’s current public housing tenancy[.]” If a resident or any other person under the resident’s control had engaged in such activities before the current tenancy, but was approved for residency, such activity should not be an authorized reason for termination. DRM requests HABC keep the language “during the household’s current public housing tenancy[.]”

Administrative Plan Comments

3.4 Closing the Waiting List

What are the criteria HABC will follow in deciding whether to keep the waiting list open for particular preferences? If the Waiting List is closed except for particular preferences, how will applicants submit an application? If an applicant does not meet the criteria for particular preferences, how will they be notified that their application was discarded?

3.5: Applicant Status While on Waiting List

Some applicants may not have reliable or consistent access to the internet or transportation to HABC offices. DRM requests HABC allow applicants update any changes while on the waiting list via telephone or mail, in addition to online or at the designated kiosk.

3.7.1 Requirement to Attend Interview

HABC’s removal of an opportunity for informal review creates a barrier in violation of HABC’s duty to affirmatively further fair housing. If an applicant misses an interview, HABC must review Reasonable Accommodation Requests if the reason for missing the interview is related to the applicant’s disability.

3.9 Final Determination and Notification of Eligibility

DRM requests HABC notify applicants in writing and by phone call of their eligibility determination and mandatory voucher briefing.

8.6.1 Expirations/Extensions

If a family submits a written request for reinstatement within 30 days of the final expiration date, and HABC denies the request, will the written decision include the reasons for denial? DRM suggests a hearing be included.

8.8.1 Special Program/Preference – Voucher Retention for Remaining Members of Participant Family

If a remaining member is eligible for a TBV, will the remaining member receive the voucher immediately or just placed on the waiting list?

10.10. Determination of Responsibility

If the family is deemed responsible for HQS deficiencies and it is due to a family member's disability, HABC must consider any Reasonable Accommodation requests submitted by the family. HABC should adjust the consequences to fit the needs of a family with a disability if necessary and linked to the disability.

11.4.1 Rent Reasonableness Methodology

While this new process to determine reasonable rents sounds good, where exactly is the data coming from? How often is HABC adjusting the reasonable rents to match the data in order to remain competitive in the market? What is HABC's process when an owner does not accept the first rent offer? Will HABC negotiate with the owner without family's request?

Shortening leasing timeframes would decrease a tenant's housing security and stability. What is HABC's minimum lease term?

11.8 Landlord Leasing Incentives

DRM requests HABC put more emphasis on leasing with landlords that have accessible units. The emphasis seems to be on new builds or opportunity neighborhoods, but it should also be on accessible units so that individuals with disabilities have more housing options.

12.3 Interim Reexaminations

An option to request an interim recertification by phone call or in person should be added.

13.4.5 Required Moves for Health and Safety Reasons

The addition of a requirement to submit a Notice to Vacate puts the family at risk of eviction. If a family submits to the owner a Notice to Vacate and does not vacate by the end of the notice, then the owner can file a Tenant Holding Over complaint in District Court. This new requirement further harms the family's ability to find new housing and negatively impacts their rental history and credit. This requirement should be removed. An alternative is HABC or the family notifying the owner of their intent to move or alternatively, require the Notice to Vacate after the family has identified housing. The administrative processes at HABC make it nearly impossible for a participant to relocate within the notice period, either 30 or 60 days. Participants face more barriers in the private housing market than non-voucher holders.

15.4.2 Absence Due to Medical Reasons

HABC's intent behind this proposal is worthy and significant for people with disabilities and suggests a more specific approach to the issue. DRM requests that HABC more carefully review

federal regulations on this specific issue of absence from the unit. Federal regulations do not require the termination of a family's participation from the voucher program for absence from the unit for 180 days, nor does HABC's Admin Plan set a cause for termination for absence from the unit. Federal regulations speak of termination of assistance from the unit. 24 C.F.R. 982.312(a) is not an identified ground for a participant's *termination* from the program, *see* C.F.R. 982.552(c), but may be grounds for affecting a participant's eligibility for participation in the program as would be the case if a HAP contract terminated because of an owner's failure to meet Housing Quality Standards (HQS). Federal statutes and regulations specifically contemplate termination of a HAP contract with continued participation, and specifically require a right to a hearing for participants when a voucher is being terminated for absence from a unit specified in 24 C.F.R. § 982.555(a)(1)(v) ("PHAs must give a participant family an opportunity for an informal hearing to consider whether the following PHA decisions relating to the individual circumstances of a participant are in accordance with the law, HUD regulations, and PHA policies:...(v) a determination to terminate assistance because the participant family has been absent from the assisted unit for longer than the maximum period permitted under PHA policy and HUD rules.")

A potential alternative would be renewal of a HAP contract based on a family's intent to return to a unit as absence requires intent of the resident, and an opportunity for a hearing if a resident did not receive notice of termination because of absence for reasons related to their disability.

15.7 Family Obligations

See comment at 10.10. Reasonable Accommodations must be reviewed and options discussed to see if any accommodation would help the family with a disability that is the cause of the failure to maintain housekeeping responsibilities.

Thank you for considering these comments.

Sincerely,

Kane V. Levings
Attorney
Disability Rights Maryland
1500 Union Avenue, Suite 2000
Baltimore, MD 21211
KaneL@disabilityrightsmd.org

Public Comments (cont'd)

Email from: J. Walker


September 14, 2022

Comments on the proposed fly2023 is good and I like some of things on it and I think the waiting list for public housing and section 8 should be opened now because there is a lot of people waiting to be on section 8 list because it's better and people don't have to wait to move . Fair housing policy should be effective now because you have family out here paying a lot just to live on public housing and then these family only have one income and where they are living at are saying because you make so much that's why your rent is going up and I think housing need to stop looking at gross and look at what they bring home after taxes & everything else on the proposed is good and some thing on there need to be happening now and not in 2023.

Appendix I: Lobbying Activities (SF-LLL) Form

NOT APPLICABLE DISCLOSURE OF LOBBYING ACTIVITIES			Approved by OMB 0348-0046
Complete this form to disclose lobbying activities pursuant to 31 U.S.C. 1352 (See reverse for public burden disclosure.)			
1. Type of Federal Action: <input type="checkbox"/> a. contract <input type="checkbox"/> b. grant <input type="checkbox"/> c. cooperative agreement <input type="checkbox"/> d. loan <input type="checkbox"/> e. loan guarantee <input type="checkbox"/> f. loan insurance	2. Status of Federal Action: <input type="checkbox"/> a. bid/offer/application <input type="checkbox"/> b. initial award <input type="checkbox"/> c. post-award	3. Report Type: <input type="checkbox"/> a. initial filing <input type="checkbox"/> b. material change For Material Change Only: year _____ quarter _____ date of last report _____	
4. Name and Address of Reporting Entity: <input type="checkbox"/> Prime <input type="checkbox"/> Subawardee Tier _____, if known: Congressional District, if known: ^{4c}	5. If Reporting Entity in No. 4 is a Subawardee, Enter Name and Address of Prime: Congressional District, if known:		
6. Federal Department/Agency:	7. Federal Program Name/Description: CFDA Number, if applicable: _____		
8. Federal Action Number, if known:	9. Award Amount, if known: \$ _____		
10. a. Name and Address of Lobbying Registrant (if individual, last name, first name, MI):	b. Individuals Performing Services (including address if different from No. 10a) (last name, first name, MI):		
11. Information requested through this form is authorized by title 31 U.S.C. section 1352. This disclosure of lobbying activities is a material representation of fact upon which reliance was placed by the tier above when this transaction was made or entered into. This disclosure is required pursuant to 31 U.S.C. 1352. This information will be available for public inspection. Any person who fails to file the required disclosure shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.	Signature: Print Name: Janet Abrahams Title: President and Chief Executive Officer Telephone No.: 410-396-5504 Date: 09/21/2022		
Federal Use Only:		Authorized for Local Reproduction Standard Form LLL (Rev. 7-97)	

Appendix J: Certification of Payment (HUD-50071) Form

<p>Certification of Payments to Influence Federal Transactions</p>	<p style="text-align: right;">OMB Approval No. 2577-0157 (Exp. 11/30/2023)</p> <p style="text-align: center;">U.S. Department of Housing and Urban Development Office of Public and Indian Housing</p>
<p>Public reporting burden for this information collection is estimated to average 30 minutes. This includes the time for collecting, reviewing, and reporting data. The information requested is required to obtain a benefit. This form is used to ensure federal funds are not used to influence members of Congress. There are no assurances of confidentiality. HUD may not conduct or sponsor, and an applicant is not required to respond to a collection of information unless it displays a currently valid OMB control number.</p>	
<p>Applicant Name</p> <p>Housing Authority of Baltimore City</p>	
<p>Program/Activity Receiving Federal Grant Funding</p> <p>Moving to Work Program</p>	
<p>The undersigned certifies, to the best of his or her knowledge and belief, that:</p>	
<p>(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.</p> <p>(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.</p>	<p>(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.</p> <p>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.</p>
<p>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)</p>	
<p>Name of Authorized Official</p> <p style="text-align: center;">Janet Abrahams</p>	<p>Title</p> <p style="text-align: center;">President and Chief Executive Officer</p>
<p>Signature</p> <p style="text-align: center;"></p>	<p>Date (mm/dd/yyyy)</p> <p style="text-align: center;">09/21/2022</p>
<p>Previous edition is obsolete form HUD 50071 (01/14)</p>	

Appendix K: RAD Significant Amendment

Changes to the previously approved RAD Significant Amendment in HABC's 2018 MTW Plan

Name of Public Housing Development	PIC Development ID	Conversion Type	Transfer of Assistance
Arbor Oaks	MD002000101	RAD PBV or RAD/Section 18 Blend of PBV & Tenant Protection Vouchers (60/40 Construction Blend)	None
Pre-Conversion Total Units	Pre-RAD Unit Type	Post-RAD Unit Type	Capital Fund Allocation
62	Family	Family	\$42,282.00
Bedroom Type	Number of Pre-RAD Units	Number of Post-RAD Units	Changes in Units and Why
Studio	0	0	
1-Bedroom	31	31	None
2-Bedroom	31	31	None
3-Bedroom	0	0	
4-Bedroom	0	0	
5-Bedroom	0	0	
6-Bedroom	0	0	
Transfer of Assistance:	No		

Name of Public Housing Development	PIC Development ID	Conversion Type	Transfer of Assistance
Townes at the Terraces	MD0020000106	RAD PBV or RAD/Section 18 Blend of PBV	None
Pre-Conversion Total Units	Pre-RAD Unit Type	Post-RAD Unit Type	Capital Fund Allocation
203	Family	Family	\$65,317.00
Bedroom Type	Number of Pre-RAD Units	Number of Post-RAD Units	Changes in Units and Why
Studio	0	0	
1-Bedroom	0	2	Reconfiguration of 3-bedroom unit to create two 1-bedroom units.
2-Bedroom	78	78	None
3-Bedroom	110	107	3-bedroom units reconfigured to create an on-site maintenance shop and two 1-bedroom units. HABC received HUD FHEO approval for this change in April 2022.

Bedroom Type	Number of Pre-RAD Units	Number of Post-RAD Units	Changes in Units and Why
4-Bedroom	15	15	
5-Bedroom	0	0	
6-Bedroom	0	0	
Transfer of Assistance:	No		

Changes to the previously approved RAD Significant Amendment in HABC's 2020 MTW Plan

Name of Public Housing Development	PIC Development ID	Conversion Type	Transfer of Assistance
Carey House	MD002000202A	RAD PBV or Blend of RAD PBV & PBV	None
Pre-Conversion Total Units	Pre-RAD Unit Type	Post-RAD Unit Type	Capital Fund Allocation
23	Mixed Population	Mixed Population	\$59,409.00
Bedroom Type	Number of Pre-RAD Units	Number of Post-RAD Units	Changes in Units and Why
Studio	0	0	
1-Bedroom	9	9	None
2-Bedroom	14	14	None
3-Bedroom	0	0	
4-Bedroom	0	0	
5-Bedroom	0	0	
6-Bedroom	0	0	
Transfer of Assistance:	No		

Name of Public Housing Development	PIC Development ID	Conversion Type	Transfer of Assistance
Laurens House	MD002000202B	RAD PBV of Blend of RAD PBV & PBV	None
Pre-Conversion Total Units	Pre-RAD Unit Type	Post-RAD Unit Type	Capital Fund Allocation
36	Mixed Population	Mixed Population	\$92,088.00
Bedroom Type	Number of Pre-RAD Units	Number of Post-RAD Units	Changes in Units and Why
Studio	2	2	
1-Bedroom	22	22	None
2-Bedroom	12	12	None
3-Bedroom	0	0	
4-Bedroom	0	0	
5-Bedroom	0	0	
6-Bedroom	0	0	
Transfer of Assistance:	No		

Name of Public Housing Development	PIC Development ID	Conversion Type	Transfer of Assistance
The Rosemont Family (low-rise)	MD002000031B	PBRA	None
Pre-Conversion Total Units	Pre-RAD Unit Type	Post-RAD Unit Type	Capital Fund Allocation
106	Family	Family	\$284,186
Bedroom Type	Number of Pre-RAD Units	Number of Post-RAD Units	Changes in Units and Why
Studio	0	0	
1-Bedroom	0	0	
2-Bedroom	0	0	
3-Bedroom	64	65	Created an additional 3-bedroom UFAS unit to meet consent decree requirements. HABC received HUD FEHO approval for this change in March 2022.
4-Bedroom	35	35	None
5-Bedroom	7	6	Reconfigured on 7-bedroom unit to create 3-bedroom UFAS unit.
6-Bedroom	0	0	
Transfer of Assistance:	No		

As part of the RAD conversion initiative, a further Significant Amendment to the MTW Plan will not be required for the following RAD-specific actions, provided that the adjustments to the RAD plans are authorized by the Board of Commissioners in the normal course of business.

- 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;
- Decisions to apply MTW funding or programmatic flexibility to post-conversion RAD developments;
- Decisions or changes related to the ownership and/or financing structures for each approved RAD conversion including decisions to allocate HABC financial resources as a source of funds to support the RAD conversion initiatives;
- Changes to the construction and rehabilitation plans and scheduled for each approved RAD conversion;
- Changes to the project names or sponsor entity names;
- With respect to Faircloth to RAD conversions, decisions to reduce or increase the number of subsidized units;

- Changes in the post-conversion bedroom size distribution and/or the number of de minimis unit reductions up to the 5% permitted under RAD program rules;
- Changes to the pre-conversion bedroom size distribution and/or the project or AMP from which transfer of assistance units will be converted; and,
- Decisions to change the conversion subsidy to either Project Based Vouchers or Project Based Rental Assistance.