



FY 2021

# MTW ANNUAL Plan

U.S. Department of Housing & Urban Development  
Office of Public Housing  
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## **Moving to Work Draft Annual Plan**

**Fiscal Year 2021**

**Approved by the HABC Board of Commissioners:**

**Date TBA**

**Submitted to HUD:**

**Date TBA**

**Housing Authority of Baltimore City**  
**Moving to Work Amended Annual Plan – Fiscal Year 2021**

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## 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) 2021, i.e. the period from January 1, 2021 through December 31, 2021.

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 2021. 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 2021 are all designed to promote one or more of the MTW statutory objectives.

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

## **B. MTW Long-Term Goals and Objectives**

The year 2020 brought with it a set of challenges and hardships that few could have expected or fully planned for. Like other housing authorities across the nation, HABC took significant measures to keep our residents and staff safe and healthy while we developed and implemented new policies and protocols in the midst of a global health crisis. While much of the year was spent responding to the COVID-19 pandemic, the HABC team never lost sight of all the other efforts we put forth every day to strengthen and serve our communities. In late 2019, HABC finalized an Emergency Response and Preparedness Plan that details activities related to preparation, response and recovery for any type of major emergency or disaster. In the wake of the pandemic, HABC was able to use recommendations and strategies from this plan to adapt our operations with as little disruptions as possible.

As we continue to adjust our ways of conducting business in response to COVID-19, several fundamental objectives have emerged under which HABC will administer our programs and carry out our key initiatives for the foreseeable future. These objectives are:

- RESPOND:** Protecting the safety and well-being of our employees and the communities we serve as we continue to perform the critical work of agency; responding to the needs of our residents and program participants by connecting them to services and resources; strengthening our communities through redevelopment efforts that improve quality of life.
- RETURN:** Returning to regular operations while prioritizing safety and establishing objectives; assisting our residents as they navigate new and changing circumstances; maintaining our focus on HABC's mission and goals.
- REASSURE:** Assuring our staff and residents that we will equip them with the necessary tools to help them take care of themselves; keeping all stakeholders apprised of our plans and initiatives; providing our residents with information, resources and support; enhancing our communication efforts.

**REINVENT:** Establishing new workplace practices while maintaining employee engagement and continued services; redefining the ways in which HABC does business; streamlining our processes and enhancing remote access to our programs and services; transforming and integrating our communities through comprehensive neighborhood revitalization efforts.

The “Four Rs” listed above materialized as a result of the COVID-19 health crisis. However, they are easily carried over to HABC’s efforts that reach beyond the state of emergency caused by the pandemic. In 2020, HABC adopted several temporary waivers that HUD made available to assist in the operation and administration of our programs in response to COVID-19. Along those lines, HABC is proposing a new MTW activity in our 2021 Plan that waives certain policies and program requirements to increase efficiency in cases of emergency.

When schools moved to virtual platforms and offices closed for in-person services, another matter that was brought to the forefront in the past year was the need to bridge the digital divide. HABC is partnering with Baltimore City agencies, corporations and nonprofits to facilitate home broadband access and provide devices and technology training to the residents at our public housing sites.

HABC is also continuing to implement our Strategic Plan, called Pathways to Success, which provides a framework and sets forth priorities and action items designed to support our mission, vision and goals. The plan outlines three strategic priority areas, (1) Transform, (2) Innovate, and (3) Advocate and includes broad objectives as well as targeted strategies to be implemented over a 10-year period that began in 2019. These priorities and objectives are reflected in all of our key initiatives, including those in this FY 2021 MTW Plan.

### **C. MTW Goals and Objectives for Fiscal Year 2021**

In support of our Strategic Plan as well as our aim to Respond, Return, Reassure and Reinvent, HABC’s major goals for FY 2021 include the following activities, all of which utilize MTW Block Grant and/or programmatic flexibility:

**Public Housing Occupancy** – HABC projects that it will achieve a 97% adjusted occupancy rate<sup>1</sup> in its public housing developments.

**Voucher Utilization** – HABC projects that, on average, it will have 19,107 units under lease each month, including Thompson and all other programs.

**Project-Based Voucher Utilization:** – HABC projects that 2,375 housing units will be under contract in the Project-Based Voucher (PBV) program by the end of FY 2021, including 50 planned units at two new developments to be placed under contract during the fiscal year.

**Capital Program** – HABC will implement capital improvements at existing housing developments and scattered sites using MTW Block Grant funds (see Table 5). In FY 2021, HABC projects that it will expend approximately \$48.8 million on capital projects.

**Development Program:** – : HABC will undertake development activities designed to support the revitalization of Baltimore neighborhoods and replace distressed and obsolete public housing developments, including the completed renovation of Hollander Ridge properties by the close of March 2021. HABC will also continue to implement the Perkins Somerset Oldtown (PSO) Transformation Plan, which includes the demolition of 629 units at Perkins Homes which will be replaced with 652 newly constructed public housing units that will be located throughout a new mixed-income community. This initiative was made possible through a \$30 million Choice Neighborhoods grant from HUD and will leverage approximately \$1 billion of investment within the PSO footprint.

**Rental Assistance Demonstration Program (RAD):** – Conversion through RAD generates new capital resources, preserves existing affordable housing resources, ensures long-term affordability and improves the quality of life for residents. As of FY 2020, HABC has closed on 23 RAD developments, consisting of 3,745 units, representing a total investment of \$717.3 million, including private equity and other new funds through the Low-Income Housing Tax Credit (LIHTC) program. While each converted development has a new ownership structure including a new management and maintenance team, HABC continues to have an ownership role (through its affiliates) and ongoing roles related to admissions, transfers and compliance monitoring. In FY 2021 HABC will continue the conversion process. Subject to approval by the Board of Commissioners, HABC may elect to apply to HUD for RAD conversion commitments at additional public housing sites. HABC will consult with local and citywide resident organizations prior to submission of future RAD applications.

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<sup>1</sup> The adjusted occupancy rate reflects the percentage of units that are available for occupancy that are actually occupied and excludes units that are vacant and exempt consistent with 24 CFR 902.22. These exempt units include units: a) undergoing renovation and/or vacated due to consent decree mandated alterations; b) undergoing modernization; c) approved for deprogramming (disposition or demolition); d) approved for non-dwelling purposes; e) lost due to reconfiguration.



**Resident Services** – HABC plans to serve its public housing residents through a wide array of self-sufficiency, personal development and supportive service program offerings, including adult education classes, the ConnectHome Program, Raising a Reader Pilot Initiative, Ticket to Work and MyGoals for Employment Services.

**Proposed MTW Activities** – HABC is proposing two (2) new MTW activities in FY 2021. Under the first activity, HABC will use its MTW authority to establish an Emergency Waivers activity 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. This MTW activity will be used to waive certain requirements when completing reexaminations, and HQS inspections, when extending FSS Contract of Participation, or increasing payment standard under the Housing Choice Voucher Program (HCVP). The complete list of Emergency Waivers are described in detail under MTW Proposed Activity 2021-01 beginning on page 42.

The second activity will allow HABC to utilize MTW authority 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 under HABC's MTW Section 32 Homeownership Plan. A third MTW activity is being proposed by the Baltimore Regional Housing Program (BRHP). BRHP is the organization that administers vouchers under the Thompson Settlement Agreement).

**Office of Resident Services MTW Homeownership Programs** – In FY 2021, HABC plans to implement a new homeownership program and revise the existing public housing homeownership program. Under the new Collaborative Homeownership Program for Conventional Public Housing Residents, HABC will sell vacant scattered sites properties to local community developers with the understanding that the renovated units must be sold to families living in conventional public housing.

The second homeownership program proposed for FY 2021 is a modification of HABC's existing MTW Scattered Sites Homeownership Program, and called the Scattered Sites Homeownership Conversion Program (SSHCP). Under the revised SSHCP HABC is prepared to offer non-cash second mortgages up to 25% of the after-rehab appraised value. The second mortgage is non-cash, non-interest bearing loan that will be paid back during or after the first mortgage has been paid in full or if the property or any part of the land thereof is refinanced, ownership transferred or sold.

**Homelessness Prevention Initiatives:** – The Housing First Homeless Initiative does not require MTW Authority as HABC provides up to 850 Housing Choice Vouchers to eligible chronically homeless households referred by the Mayor's Office of Homeless Services (MOHS). Participants

use their vouchers to find affordable permanent housing while receiving supportive services MOHS and partner agencies.

***The Homeless and Veterans Set Asides:*** – Using its MTW authority, HABC has awarded 192 vouchers (171 are under HAP contract) for Project-Based units designated to house the homeless. These vouchers are included in the 850 vouchers that have been set aside for the Housing First initiative. Additionally, HABC has awarded 182 vouchers (19 are under HAP contract) for Project-Based units designated to house homeless veterans and their families.

***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 the Mayor’s Office of Homeless Services (MOHS). MTW Authority is not required for this initiative.

***Analysis of Impediments to Fair Housing*** – The Baltimore regional analysis of impediments to fair housing (AI) was completed in 2020. The Regional AI was conducted on behalf of the City of Annapolis and the Housing Authority of the City of Annapolis; Anne Arundel County and the Housing Commission of Anne Arundel County; the City of Baltimore and HABC; Baltimore County; Harford County and the Havre de Grace Housing Authority; and Howard County and the Howard County Housing Commission. It was coordinated by the Baltimore Metropolitan Council. Root Policy, a consultant based in Denver, Colorado, was hired to assist with conducting and preparing the AI and the actions steps that resulted from the AI. In addition to participating in the implementation of a number of the regional actions steps, HABC will implement its own action steps, which include creating a Healthy Opportunities Program (“HOP”). HOP will be a mobility program that will assist families with children who are currently participants in HABC’s voucher program where one or more family member has a medical condition, such as asthma, that is exacerbated by environmental factors. Housing and healthcare providers will collaborate to provide such participants with the ability to move to stable, affordable and healthy housing in opportunity areas with the goal of improving participants’ health outcomes and overall quality of life.

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

## Notes on Thompson and Bailey Settlements

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

1. Class action *Thompson v. HUD*, filed against HABC, the City of Baltimore and HUD. A 2012 settlement agreement resulted in the following provisions:
  - 2,600 additional Housing Choice Vouchers from 2012 through 2018 ("Thompson Remedial Vouchers");
  - Continuation of the 1,788 Housing Choice Vouchers already utilized under the Thompson Partial Consent Decree ("Thompson PCD-Leased Vouchers"); and
  - The continuation of the Thompson Homeownership Voucher Program.

MTW flexibility continues to be utilized to support Thompson activities, and is referenced accordingly in the MTW Annual Plan.

2. The *Bailey Consent Decree* required the creation of the following:
  - 756 housing units that meet the Uniform Federal Accessibility Standards (UFAS); and
  - 600 project-based voucher 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).

HABC will create additional LTA NED units and LTA UFAS units to complete its obligations under the Bailey Consent Decree.

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## 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

HABC will acquire and rehabilitate 10 one-bedroom units as new public housing units. These scattered site units are planned for occupancy in FY 2021.

**Table 1: Planned New Public Housing Units in FY 2021**

AMP Name and Number	Bedroom Size						Total Units	Population Type*	# of UFAS Units	
	0/1	2	3	4	5	6+			Fully Accessible	Adaptable
Scattered Sites**	10						10	Other – (Non-Elderly Disabled)	1 unit will be Fully Accessible	
Total Public Housing Units to be Added in the Plan Year							10			

\*Population Type: General, Elderly, Disabled, Elderly/Disabled, Other

\*\* The specific AMP number will be identified when the scattered sites are finalized

If "Population Type is "Other" please describe:

Other – Non-Elderly Disabled

#### ii. Planned Public Housing Units to Be Removed

As shown on Table 2, HABC plans to demolish and/or dispose of 1,022 units and 10 vacant lots in FY 2021. 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.

Before relocating any of the residents occupying one of the public housing units listed in Table 2, HABC will first obtain HUD approval of its disposition application, which will contain a Relocation Plan for occupied units as required by HUD.

**Table 2: Planned Public Housing to Be Removed in FY 2021**

PIC Dev.#/AMP and PIC Dev. Name	Number of Units to be Removed	Explanation for Removal
MD002/0009 O'Donnell Heights	Vacant Lots	HABC plans to submit a disposition application to HUD in FY 2021 for the disposition of 6 single-family lots for the developer to build for-sale housing units as part of Phase 1 redevelopment. Planning for redevelopment of Phase 2, consisting of 27 vacant acres is underway and a disposition application will be submitted in FY 2021.
MD002/003 Perkins RAD/CNI	629	Perkins Homes will be redeveloped as part of the Perkins Somerset Oldtown Transformation Plan and HUD Choice Neighborhoods (CN) award. The demo & disposition applications will be submitted to HUD in late FY 2020 for the first 100 units (Perkins Phase I – Block A). The demo & disposition applications for the remaining 529 units in FY 2021. For those phases financed with multifamily housing bonds and 4% Low Income Housing Tax Credits, 25% of the CN replacement units will be subsidized with project-based vouchers. The remaining 75% of the CN replacement units will be

PIC Dev.#/AMP and PIC Dev. Name	Number of Units to be Removed	Explanation for Removal
		converted under RAD PBV.
MD002/004 Poe Homes	288	HABC will submit a disposition application to HUD for Poe Homes as part of the Poe Homes Transformation Plan.
MD002/0103 - Midtown Apartments	1	922 N Calhoun St B To be sold to the Mayor and City Council for FMV.
MD002/0103 - Midtown Apartments	1	922 N Calhoun St A To be sold to the Mayor and City Council for FMV.
MD002/0103 - Midtown Apartments	1	925 N Carey St A To be sold to the Mayor and City Council for FMV.
MD002/0103 - Midtown Apartments	1	925 N Carey St B To be sold to the Mayor and City Council for FMV.
MD002/0103 - Midtown Apartments	1	1213 Mosher St A To be sold to the Mayor and City Council for FMV.
MD002/0103 - Midtown Apartments	1	1213 Mosher St B To be sold to the Mayor and City Council for FMV.
MD002/0103 - Midtown Apartments	1	1319 Mosher St To be sold to the Mayor and City Council for FMV.
MD002/0103 - Midtown Apartments	1	1605 Riggs Av To be sold to the Mayor and City Council for FMV.
MD002/0103 - Midtown Apartments	1	1623 Mosher St A To be sold to the Mayor and City Council for FMV.
MD002/0103 - Midtown Apartments	1	1623 Mosher St B To be sold to the Mayor and City Council for FMV.
MD002/0103 - Midtown Apartments	1	1627 Mosher St A To be sold to the Mayor and City Council for FMV.
MD002/0103 - Midtown Apartments	1	1627 Mosher St B To be sold to the Mayor and City Council for FMV.
MD002/0103 - Midtown Apartments	1	1830 Riggs Av To be sold to the Mayor and City Council for FMV.
MD002/0108 - Uptown Apartments	1	913 N Calhoun St A To be sold to the Mayor and City Council for FMV.
MD002/0108 - Uptown Apartments	1	913 N Calhoun St B To be sold to the Mayor and City Council for FMV.
MD002/0108 - Uptown Apartments	1	915 N Calhoun St A To be sold to the Mayor and City Council for FMV.
MD002/0108 - Uptown Apartments	1	915 N Calhoun St B To be sold to the Mayor and City Council for FMV.
MD002/0108 - Uptown Apartments	1	917 N Calhoun St A To be sold to the Mayor and City Council for FMV.
MD002/0108 - Uptown Apartments	1	917 N Calhoun St B To be sold to the Mayor and City Council for FMV.

PIC Dev.#/AMP and PIC Dev. Name	Number of Units to be Removed	Explanation for Removal
MD002/0108 - Uptown Apartments	1	920 N Gilmor St A To be sold to the Mayor and City Council for FMV.
MD002/0108 - Uptown Apartments	1	920 N Gilmor St B To be sold to the Mayor and City Council for FMV.
MD002/0108 - Uptown Apartments	1	921 N Calhoun St To be sold to the Mayor and City Council for FMV.
MD002/0108 - Uptown Apartments	1	1011 N Monroe St To be sold to the Mayor and City Council for FMV. FMV.
MD002/0108 - Uptown Apartments	1	1152 N Stricker St To be sold to the Mayor and City Council for FMV. FMV.
MD002/0108 - Uptown Apartments	1	1344 N Carey St To be sold to the Mayor and City Council for FMV. FMV.
MD002/0108 - Uptown Apartments	1	1415 Mosher St To be sold to the Mayor and City Council for FMV. FMV.
MD002/0108 - Uptown Apartments	1	1449 N Carey St To be sold to the Mayor and City Council for FMV. FMV.
MD002/0108 - Uptown Apartments	1	1800 Presbury St To be sold to the Mayor and City Council for FMV. FMV.
MD002/0108 - Uptown Apartments	1	1808 Presbury St To be sold to the Mayor and City Council for FMV. FMV.
MD002/0109 -Stricker Street Apartments	1	1150 N Carrollton Av To be sold to the Mayor and City Council for FMV.
MD002/0109 -Stricker Street Apartments	1	1306 N Carey St To be sold to the Mayor and City Council for FMV.
MD002/0109 -Stricker Street Apartments	1	1323 Mosher St To be sold to the Mayor and City Council for FMV.
MD002/0109 -Stricker Street Apartments	1	1718 W Presstman St To be sold to the Mayor and City Council for FMV.
MD002/0200 -Scattered Sites	1	404 N Bradford St To be sold to the Mayor and City Council for FMV.
MD002/0200 -Scattered Sites	1	702 N Bradford St To be sold to the Mayor and City Council for FMV.
MD002/0200 -Scattered Sites	1	705 Mura St To be sold to the Mayor and City Council for FMV.
MD002/0200 -Scattered Sites	1	707 Mura St To be sold to the Mayor and City Council for FMV.
MD002/0200 -Scattered Sites	1	711 Mura St To be sold to the Mayor and City Council for FMV.
MD002/0200 -Scattered Sites	1	713 Mura St To be sold to the Mayor and City Council for FMV.
MD002/0200 -Scattered Sites	1	715 Mura St To be sold to the Mayor and City Council for FMV.

PIC Dev.#/AMP and PIC Dev. Name	Number of Units to be Removed	Explanation for Removal
MD002/0200 -Scattered Sites	1	721 Mura St To be sold to the Mayor and City Council for FMV.
MD002/0200 -Scattered Sites	1	727 Mura St To be sold to the Mayor and City Council for FMV.
MD002/0200 -Scattered Sites	1	732 Mura St To be sold to the Mayor and City Council for FMV.
MD002/0200 -Scattered Sites	1	1106 E Preston St To be sold to the Mayor and City Council for FMV.
MD002/0200 -Scattered Sites	1	1115 Greenmount Av To be sold to the Mayor and City Council for FMV.
MD002/0200 -Scattered Sites	1	1228 Aisquith St To be sold to the Mayor and City Council for FMV.
MD002/0200 -Scattered Sites	1	1301 N Central Av B To be sold to the Mayor and City Council for FMV.
MD002/0200 -Scattered Sites	1	1301 N Central Av A To be sold to the Mayor and City Council for FMV.
MD002/0200 -Scattered Sites	1	1302 Aisquith St To be sold to the Mayor and City Council for FMV.
MD002/0200 -Scattered Sites	1	1318 Homewood Av To be sold to the Mayor and City Council for FMV.
MD002/0200 -Scattered Sites	1	1601 Aisquith St To be sold to the Mayor and City Council for FMV.
MD002/0200 -Scattered Sites	1	1607 Aisquith St To be sold to the Mayor and City Council for FMV.
MD002/0200 -Scattered Sites	1	1611 Aisquith St To be sold to the Mayor and City Council for FMV.
MD002/0201 -Scattered Sites	Vacant Lot	320 E 20th St. is a vacant lot earmarked for a land swap with the Mayor and City Council in exchange for land in the greater Poppleton area as part of the Poe Transformation plan.
MD002/0201 -Scattered Sites	Vacant Lot	318 E 20th St- is a vacant lot earmarked for a land swap with the Mayor and City Council in exchange for land in the greater Poppleton area as part of the Poe Transformation plan.
MD002/0201 -Scattered Sites	Vacant Lot	324 E. 20 <sup>th</sup> Street is a vacant lot earmarked for a land swap with the Mayor and City Council in exchange for land in the greater Poppleton area as part of the Poe Transformation plan.
MD002/0201 -Scattered Sites	Vacant Lot	328 E. 20 <sup>th</sup> Street is a vacant lot earmarked for a land swap with the Mayor and City Council in exchange for land in the greater



PIC Dev.#/AMP and PIC Dev. Name	Number of Units to be Removed	Explanation for Removal
		Poppleton area as part of the Poe Transformation plan.
MD002/0201 -Scattered Sites	Vacant Lot	336 E. 20 <sup>th</sup> Street is a vacant lot earmarked for a land swap with the Mayor and City Council in exchange for land in the greater Poppleton area as part of the Poe Transformation plan.
MD002/0201 -Scattered Sites	Vacant Lot	324 E. 20 ½ Street is a vacant lot earmarked for a land swap with the Mayor and City Council in exchange for land in the greater Poppleton area as part of the Poe Transformation Plan.
MD002/0201 -Scattered Sites	Vacant Lot	2002 Barclay Street is a vacant lot earmarked for a land swap with the Mayor and City Council in exchange for land in the greater Poppleton area as part of the Poe Transformation Plan.
MD002/0201 -Scattered Sites	Vacant Lot	2006 Barclay Street is a vacant lot earmarked for a land swap with the Mayor and City Council in exchange for land in the greater Poppleton area as part of the Poe Transformation Plan.
MD002/0201 -Scattered Sites	Vacant Lot	2008 Barclay Street is a vacant lot earmarked for a land swap with the Mayor and City Council in exchange for land in the greater Poppleton area as part of the Poe Transformation Plan.
MD002/0201 -Scattered Sites	1	505 E 26th St To be sold to the Mayor and City Council for FMV.
MD002/0201 -Scattered Sites	1	510 E 26th St To be sold to the Mayor and City Council for FMV.
MD002/0201 -Scattered Sites	1	527 Beaumont Av To be sold to the Mayor and City Council for FMV.
MD002/0201 -Scattered Sites	1	712 E 20th St To be sold to the Mayor and City Council for FMV.
MD002/0201 -Scattered Sites	1	715 E 20th St To be sold to the Mayor and City Council for FMV.
MD002/0201 -Scattered Sites	1	1309 E Biddle St To be sold to the Mayor and City Council for FMV.
MD002/0201 -Scattered Sites	1	1724 N Chester St To be sold to the Mayor and City Council for FMV.
MD002/0201 -Scattered Sites	1	1738 E North Av To be sold to the Mayor and City Council for FMV.

PIC Dev.#/AMP and PIC Dev. Name	Number of Units to be Removed	Explanation for Removal
MD002/0201 -Scattered Sites	1	1819 N Montford A To be sold to the Mayor and City Council for FMV.
MD002/0201 -Scattered Sites	1	2104 E Lafayette Av To be sold to the Mayor and City Council for FMV.
MD002/0201 -Scattered Sites	1	2112 N Calvert St A To be sold to the Mayor and City Council for FMV.
MD002/0201 -Scattered Sites	1	2112 N Calvert St B To be sold to the Mayor and City Council for FMV.
MD002/0201 -Scattered Sites	1	2114 N Calvert St A To be sold to the Mayor and City Council for FMV.
MD002/0201 -Scattered Sites	1	2114 N Calvert St B To be sold to the Mayor and City Council for FMV.
MD002/0201 -Scattered Sites	1	2229 E Federal St To be sold to the Mayor and City Council for FMV.
MD002/0201 -Scattered Sites	1	3822 Kimble Rd To be sold to the Mayor and City Council for FMV.
MD002/0202 -Scattered Sites	1	1324 N. Mount St To be sold to the Mayor and City Council for FMV.
MD002/0202 -Scattered Sites	1	528 N Stricker St To be sold to the Mayor and City Council for FMV.
MD002/0202 -Scattered Sites	1	930 W Franklin St To be sold to the Mayor and City Council for FMV.
MD002/0202 -Scattered Sites	1	1113 N Carrollton Av To be sold to the Mayor and City Council for FMV.
MD002/0202 -Scattered Sites	1	1213 N Eden St To be sold to the Mayor and City Council for FMV.
MD002/0202 -Scattered Sites	1	1404 N Fulton Av To be sold to the Mayor and City Council for FMV.
MD002/0202 -Scattered Sites	1	1510 W Lanvale St To be sold to the Mayor and City Council for FMV.
MD2/0202 -Scattered Sites	1	1702 Mckean Av To be sold to the Mayor and City Council for FMV.
MD002/0202 -Scattered Sites	1	1814 Edmondson Av B To be sold to the Mayor and City Council for FMV.
MD002/0202 -Scattered Sites	1	1814 Edmondson Av A To be sold to the Mayor and City Council for FMV.
MD002/0202 -Scattered Sites	1	1905 Herbert St To be sold to the Mayor and City Council for FMV.
MD002/0202 -Scattered Sites	1	1915 Herbert St To be sold to the Mayor and City Council for FMV.
MD002/0202 -Scattered Sites	1	2112 Druid Hill Av A To be sold to the Mayor and City Council for FMV.

PIC Dev.#/AMP and PIC Dev. Name	Number of Units to be Removed	Explanation for Removal
MD002/0202 -Scattered Sites	1	2112 Druid Hill Av B To be sold to the Mayor and City Council for FMV.
MD002/0203 -Scattered Sites	1	214 S Fulton Av To be sold to the Mayor and City Council for FMV.
MD002/0203 -Scattered Sites	1	301 S Franklinton Rd To be sold to the Mayor and City Council for FMV.
MD002/0203 -Scattered Sites	1	313 N Fulton Av To be sold to the Mayor and City Council for FMV.
MD002/0203 -Scattered Sites	1	546 N Payson St To be sold to the Mayor and City Council.
MD002/0203 -Scattered Sites	1	1717 N Smallwood St To be sold to the Mayor and City Council for FMV.
MD002/0203 -Scattered Sites	1	1734 W Lexington St To be sold to the Mayor and City Council for FMV.
MD002/0203 -Scattered Sites	1	2116 Presbury St To be sold to the Mayor and City Council for FMV.
MD002/0203 -Scattered Sites	1	2227 W Baltimore St A To be sold to the Mayor and City Council for FMV.
MD002/0203 -Scattered Sites	1	2227 W Baltimore St B To be sold to the Mayor and City Council for FMV.
MD002/0203 -Scattered Sites	1	2428 W Franklin St To be sold to the Mayor and City Council for FMV.
MD002/0203 -Scattered Sites	1	2712 Prospect St To be sold to the Mayor and City Council for FMV.
MD002/0203 -Scattered Sites	1	2817 Waldorf Av To be sold to the Mayor and City Council for FMV.
MD002/0203 -Scattered Sites	1	3012 Oakley Av To be sold to the Mayor and City Council for FMV..
MD002/0203 -Scattered Sites	1	3030 Baker St To be sold to the Mayor and City Council for FMV.
MD002/0203 -Scattered Sites	1	3907 Park Heights Av To be sold to the Mayor and City Council for FMV.
MD002/0203 -Scattered Sites	1	4108 Park Heights Av To be sold to the Mayor and City Council for FMV.
MD002/0203 -Scattered Sites	1	4204 Park Heights Av To be sold to the Mayor and City Council for FMV.
MD002/0203 -Scattered Sites	1	4206 Park Heights Av To be sold to The Mayor and City Council for FMV.
MD002/0203 -Scattered Sites	1	4918 Palmer Av To be sold to the Mayor and City Council for FMV.
MD002/0203 -Scattered Sites	1	5318 Beaufort Av To be sold to the Mayor and City Council for FMV.

PIC Dev.#/AMP and PIC Dev. Name	Number of Units to be Removed	Explanation for Removal
MD002/0203 -Scattered Sites	1	5326 Beaufort Av To be sold to the Mayor and City Council for FMV.
MD002/0203 -Scattered Sites	1	5330 Beaufort Av To be sold to the Mayor and City Council for FMV.
MD002/0203 -Scattered Sites	1	2126 Druid Hill Avenue. To be sold to a third-party purchaser.
<b>TOTAL NUMBER OF UNITS</b>	<b>1,022</b>	

### iii. Planned New Project-Based Vouchers

HABC plans to enter into an Agreement to Enter into Housing Assistance Payment (AHAP) Contracts for 50 new project-based units in FY 2021, as shown in Table 3. HABC anticipates one property with 48 units going through RAD PBV conversions in 2021. 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 3: Planned New Project-Based Vouchers**

Property Name	Number of Vouchers to be Project- Based	RAD?	Description of Project
22 Light Street Apts	2	No	2 LTA UFAS units located at 22 Light Street.
Perkins Homes – Phase 1	48	Yes	48 units at Perkins Homes to be converted to PBV through RAD.
<b>Total Planned New Project-Based Vouchers</b>	<b>50</b>		

### iv. Planned 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 provides details on those PBV developments that are currently under contract, and projects which HABC anticipates will be under contract throughout FY 2021. As noted, there are 2,325 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 2021	RAD?	Description of Project
18 W. Read St., Inc.	10	Leased/Issued	No	10 1bd NED units at 18 W. Read St.
1234 McElderry St	50	Committed	No	13 1bd, 24 2bd and 13 3bd units for PH replacement at 1234 McElderry St.
214 E. Biddle St.	5	Leased/Issued	No	5 1bd NED units at 214 E. Biddle St.
2301 N. Charles St., Inc.	7	Leased/Issued	No	2 efficiencies and 5 1bd NED/UFAS units at 2301 N. Charles St.
Alcott Place	28	Leased/Issued	No	28 1bd units at 2702 Keyworth Ave.
Artaban Ashburton Apartments	14	Leased/Issued	No	14 1bd NED units at 5906 Park Heights Ave.
Ashland Commons	12	Leased/Issued	No	12 1bd (8-NED) units at 1715 E Eager St.
Barclay	19	Leased/Issued	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/Issued	No	11 1bd NED and 4 2bd UFAS units at 341 E. 20 <sup>th</sup> St.
Barrister Court	8	Leased/Issued	No	2 efficiencies, 5 1bd, and 1 2bd UFAS unit at 1300 Washington Blvd.
Belvieu Gardens	10	Leased/Issued	No	10 1bd NED units at 3915-3921 Belvieu Ave.
Bellevue Manchester	8	Leased/Issued	No	8 1bd units at 342 Bloom St.

Property Name	Number of Project-Based Vouchers	Planned Status at End of FY 2021	RAD?	Description of Project
Bennett House	25	Leased/Issued	No	24 SROs and 1 1bd unit at 14 E Franklin St. designated to provide supportive services to low-income residents
Bon Secours – Gibbons	20	Leased/Issued	No	12 1bd NEDs, 4 2bd and 4 3bd UFAS units at 900 Desoto Rd.
Bon Secours – New Shiloh	19	Leased/Issued	No	16 1bd (11-NED), 2 2bd and 1 3bd units at 1930 Windsor Ave. (8-PB Homeless)
Brexton Chase	7	Leased/Issued	No	7 1bd NED units at 241 W. Chase St.
Brick by Brick	2	Leased/Issued	No	2 1bd NED units at 903 Gorsuch Ave.
Butchers Row	9	Leased/Issued	No	3 1bd, 2 2bd, and 4 3bd units at E. Baltimore St.
Calvert Street Properties	18	Leased/Issued	No	18 1bd NED units at 1625 N. Calvert St.
Calverton House	14	Leased/Issued	No	13 SROs and 1 efficiency at 119 E. 25 <sup>th</sup> St.
Chapel Green	20	Leased/Issued	No	8 1bd NED units and 12 3bd (4-UFAS) units at Chase, Wolfe, and Washington Streets
Cherry Hill Senior Housing	50	Leased/Issued	No	48 1bd NED units and 2 2bd UFAS units at 901 Cherry Hill Rd.
Cherrydale	32	Leased/Issued	No	32 1bd NED units at 1118 Cherry Hill Rd.
City Arts	11	Leased/Issued	No	11 1bd NED units at 440 E. Oliver St.
City Arts II	15	Leased/Issued	No	12 1bd NED and 3 2bd UFAS units at 1700 Greenmount Ave.
Clare Court Apartments	15	Leased/Issued	No	5 1bd, 7 2bd and 3 4bd (7-NED, and 3-UFAS) units at 3725 Ellerslie Ave.
Clarks Lane	6	Leased/Issued	No	6 1bd NED units at 3901 Clarks Ln.
Clarksview, LLC	8	Leased/Issued	No	8 1bd NED units at 3701-3711 Clarks Ln.
Coel-Grant Higgs	57	Leased/Issued	No	32 efficiencies and 25 1bd (6-UFAS) units at 1700 N Gay St.
Coleman Manor	49	Leased/Issued	No	49 1bd (8-NED, 5-UFAS) units at Walbrook Ave.

Property Name	Number of Project-Based Vouchers	Planned Status at End of FY 2021	RAD?	Description of Project
Columbus School Apts.	8	Leased/Issued	No	8 1bd units at 2000 E North Ave
Community Housing	6	Leased/Issued	No	1 efficiency, 1 1bd, 1 2bd, and 3 3bd scattered site units
Dayspring	18	Leased/Issued	No	17 2bd and 1 3bd transitional units at 1125 Patterson Park
DiMaggio Scattered Sites	23	Leased/Issued	No	8 2bd, 10 3bd, 4 4bd, and 1 5bd units designated for chronically homeless households at scattered sites
Dominion Properties	7	Leased/Issued	No	3 1bd NED units and 4 3bd units at 1617 Dukeland Ave., 6 <sup>th</sup> St., Hilton and Monument Streets
Dorchester Apts.	10	Leased/Issued	No	10 1bd NED units at 4300 Liberty Heights Ave.
Druid Hill LTD	12	Leased/Issued	No	10 2 bd and 2 3bd units at 1621 Druid Hill Ave.
Druid House	19	Leased/Issued	No	8 2bd and 11 3bd units at McCulloh St.
Epiphany House	33	Leased/Issued	No	33 efficiencies at 5610 York Rd.
Fallstaff Apts.	4	Leased/Issued	No	2 1bd NED units, 1 2bd and 1 3bd (1-UFAS) units at 3800-3810 Fallstaff Rd.
Fells Point Station	14	Leased/Issued	No	11 1bd and 3 2bd (6-NED, 8-UFAS) units at 1621 Bank St.
Four Ten Loft Apts	20	Committed	No	20 - 1bd units at 410 N Eutaw St.
Franklin Flats	7	Leased/Issued	No	7 1bd NED units at 20 E. Franklin St.
Greenmount & Chase	19	Committed	No	New Construction of 60 units located in the Johnston Square neighborhood at Greenmount Ave., Chase and Proctor Streets, of which 19 will be project based
Greens at Irvington Mews	20	Leased/Issued	No	20 - 1bd NED units at 4300 Frederick Ave.

Property Name	Number of Project-Based Vouchers	Planned Status at End of FY 2021	RAD?	Description of Project
Harry & Jeannette Weinberg Place	88	Leased/Issued	No	85 efficiencies and 3 1bd units at 2500 W. Belvedere Ave.
Holden Hall	14	Leased/Issued	No	14 SRO units at 761 W. Hamburg St.
Indecco	9	Leased/Issued	No	2 efficiencies and 7 1bd units at 940 S. Lakewood Ave.
Independence Place	21	Leased/Issued	No	11 1bd and 10 2bd units designated for chronically homeless households at 4101½ Old York Rd.
Irvington Woods	57	Leased/Issued	No	11 1bd NED and 46 2bd units at 4102-4126 Potter St.
JByrd	3	Leased/Issued	No	3 1bd NED units at Windsor Mill Rd.
Jenkins House	22	Leased/Issued	No	20 SRO and 2 1bd units at 2226 Maryland Ave.
John Manley House	5	Leased/Issued	No	5 1bd NED units at 5304 Harford Rd.
Keys Pointe – Phase 1B	34	Leased/Issued	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/Issued	No	14 1bd (all NED) units at 216 N Liberty St.
Lillian Jones Apts.	22	Leased/Issued	No	14 1bd NED, 2-2bd and 6-3bd UFAS units at 1303 Greenmount Ave.
M on Madison	23	Leased/Issued	No	23 1bd NED units at 301 W. Madison St.
Marian House	8	Leased/Issued	No	4 SRO and 4 3bd units at 949 Gorsuch Ave.
Marian House II	5	Leased/Issued	No	5 1bd (3-NED, 2-UFAS) units at 932 Gorsuch Ave.
Mary Harvin Center	8	Leased/Issued	No	8 1bd units at 1600 N. Chester St.
Metro Heights at Mondawmin	18	Leased/Issued	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/Issued	No	6 1bd NED units at 3900 W. Northern Pkwy.



Property Name	Number of Project-Based Vouchers	Planned Status at End of FY 2021	RAD?	Description of Project
Moravia	60	Leased/Issued	No	57 1bd and 3 2bd units (9-NED, 6-UFAS) at 6050 Moravia Park Dr.
Mount Royal Apts.	5	Leased/Issued	No	5 1bd units at 1512 W. Mt. Royal Ave.
Mulberry at Park Apts.	19	Leased/Issued	No	11 1bd NED units, 2 2bd and 6 3bd UFAS units at 211 W. Mulberry St.
North Barclay Green III	12	Leased/Issued	No	9 1bd units and 3 3bd UFAS units at E. 21 <sup>st</sup> St. and Greenmount Ave.
North Avenue Gateway	16	Leased/Issued	No	11 1bd NED units and 5 2bd units at 3001-3003 W. North Ave.
North Avenue Gateway II	16	Leased/Issued	No	10 1 bd NED units and 5 2bd units at 3001-3003 W. North Ave.
Oaks at Liberty	45	Leased/Issued	No	45 1bd units at 3501 Howard Park Ave.
O'Donnell Heights	42	Leased/Issued	No	16 1bd (12-NED) units, 12 2bd units, 13 3bd units, and 1 4bd unit (4-UFAS)
Orchard Ridge I-V	197	Leased/Issued	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/Issued	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/Issued	No	8 1bd NED units and 4 2bd UFAS units at 4637 Park Heights Ave.
Penn North	15	Leased/Issued	No	14 1bd NED units and 1 3bd UFAS unit at 2600 Pennsylvania Ave.
Penn Square II	15	Leased/Issued	No	12 1bd NED and 3 3bd UFAS units at 2600 Pennsylvania Ave.
Parkwood	3	Leased/Issued	No	3 1bd NED units at scattered sites
Poppleton II	15	Leased/Issued	No	11 1bd NED units and 4 3bd UFAS units at 838 W. Fairmount Ave.

Property Name	Number of Project-Based Vouchers	Planned Status at End of FY 2021	RAD?	Description of Project
Poppleton III	10	Leased/Issued	No	7 1bd NED units, 1 2bd UFAS and 2 3bd UFAS units at 866 W. Fayette St.
Pratt Street	35	Leased/Issued	No	27 2bd and 8 3bd units at 1700 W Pratt St. – transitional housing
Restoration Gardens	43	Leased/Issued	No	40 efficiencies and 3 1bd units designated for homeless youth at 3701 Cottage Ave.
Restoration Gardens II	42	Leased/Issued	No	42 efficiencies (3-UFAS units) designated for homeless youth at 4201 York Rd.
Seminole Apartments	6	Leased/Issued	No	6 1bd NED units at 4300 Seminole Ct.
Sharon Towers	10	Leased/Issued	No	10 2bd units at 4-6 N. Carey St.
Sharp Leadenhall	4	Leased/Issued	No	4 1bd units (3-UFAS) at Race and West Streets
Sojourner at Argyle Apartments	12	Leased/Issued	No	12 1bd (2-UFAS) units designated for chronically homeless households at 1411 Argyle St.
St. Stephens	15	Leased/Issued	No	15 1bd NED units at 3900 Roland Ave.
St. Vincent DePaul	9	Leased/Issued	No	8 2bd and 1 3bd units at Ulman Ave.
St. Vincent DePaul	5	Leased/Issued	No	1 3bd and 4 4bd units designated for chronically homeless households at Bond St. and Cottage Ave.
Symphony Home at Purdue	6	Leased/Issued	No	6 1bd units at 5683 Purdue Ave.
Union Ave. – Buena Vista Apartments	48	Leased/Issued	Yes	15 1 bd and 33 2 bd units converted through Rental Assistance Demonstration (RAD-2) at 1420-1436 Union Ave.
Uplands	62	Leased/Issued	No	24 1bd, 31 2bd, and 7 3bd units (16-NED, 6-UFAS) at 4520 Scarlet Oak Ln.
Walbrook Mills Apts	1	Leased/Issued	No	1 3bd (UFAS) unit at 2636 W North Ave.
Wayland Village	45	Leased/Issued	No	45 1bd (14-NED) units at 3020 Garrison Blvd.

Property Name	Number of Project-Based Vouchers	Planned Status at End of FY 2021	RAD?	Description of Project
Weinberg Family Center – 1209 Rose	8	Leased/Issued	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/Issued	No	14 2bd and 4 3bd units designated for chronically homeless households at 4613 Park Heights Ave
Weinberg Manor East	75	Leased/Issued	No	10 SRO, 41 efficiencies, and 24 1bd units (10-NED, 5-UFAS) at 3601 Fords Ln.
Weinberg Manor South	14	Leased/Issued	No	14 1bd NED units at 3617 Fords Ln.
Westminster House	163	Leased/Issued	No	103 efficiencies, 55 1bd, and 5 2bd units at 524 N. Charles St.
<b>Total</b>	<b>2,325</b>			

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

In FY 2020, HABC completed an asset review of the Scattered Sites inventory, which was submitted to the local HUD office. Each property was assigned a grade that allowed HABC to determine the feasibility of keeping the unit based on neighborhood conditions, HABC's fiscal restraints and any over-arching plans that the City of Baltimore may have for investment or blight elimination.

Based on the grades assigned to the properties under review, HABC will dispose of 105 scattered sites public housing units ( in addition to the 629 units under development at Perkins, the 288 units at Poe Homes and 9 vacant lots) most of which will be sold to the Mayor and City Council of Baltimore City for fair market value (FMV). Those that cannot be sold for FMV will be auctioned off to the public as described below.

The review has a five-pronged approach to provide a roadmap and framework for demolition and/or disposition of obsolete units as well as the preservation of existing units:

[Disposition or Sale to the City of Baltimore](#) – For non-viable and/or obsolete Scattered Sites properties, HABC will first determine if the property is located in an area or neighborhood where there is future or ongoing re-investment or blight elimination by the City of Baltimore. If so, the properties will be conveyed to the City for fair market value.

Homeownership – Units considered for homeownership must be in areas of opportunity, those undergoing re-investment and/or those with a sustainable future.

Third Party Sales – HABC is often approached by private individuals, developers and other entities asking to purchase its Scattered Sites properties. If HABC determines that a unit/building will not be sold to the City of Baltimore or is unsuitable for homeownership, HABC may negotiate a sale to a third party.

Baltimore Affordable Housing Development, Inc. (BAHD) – On May 28, 2014, HABC created BAHD to facilitate development activities, including the development projects approved by HUD for RAD, or other affordable housing development activities in Baltimore City. The entity was created as a subsidiary to insulate HABC assets from investment risks associated with housing projects that the entity may choose to develop, own, or guarantee. BAHD applied for and was awarded tax-exempt status under 501(c)(3) of the Internal Revenue Code. HABC may convey scattered site properties to BAHD, and those properties will be located in stable neighborhoods.

Properties for Auction – HABC awarded a contract for an auctioneer and anticipates having an auction for approximate 82-100 properties in late 2020 or early 2021 for buildings that are obsolete, too expensive to renovate or are in non-viable neighborhoods when no other strategy is available to keep them.

**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 \$48.8 million on capital-related activities in FY 2021. 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**

<b>No.</b>	<b>Development Name</b>	<b>Description of Work</b>	<b>FY 2021 Planned Expenditures</b>
1.	Latrobe Homes	EMCS Building Control Panel Relocation, Concrete Repairs	550,000
2.	McCulloh Homes	Exterior Door Replacement, Heating system upgrade (McCulloh Homes Extension Electrical Supplemental), Efficient Interior Lighting, Electric Meters & Tenant Surcharges, Misc - Gas Piping Infrastructure, Photovoltaic Power Generation (PV)	1,525,631
3.	Perkins Homes	Emergency Repairs, Relocation Activities, Redevelopment of Phase III (Perkins 1) 94 Units	3,270,184
4.	Poe Homes	Emergency Repairs, Renovate Unit to Resident (504 compliant) Meeting Space, Relocation Activities, Extraordinary Maintenance	1,175,000
5.	Douglass Homes	Concrete Repairs to Porches and Sidewalks, Install Sump Pumps, Risk Reduction/Abatement (Community Building and Units), Electric Meters & Tenant Surcharges, Efficient Interior Lighting, Cogeneration (CHP) Units; Lead based paint grant initiatives	2,124,595
6.	Gilmor Homes	Boilers and Steam Distribution System Upgrades, Site Improvements, Condensate Units and Sump Pumps Installations, Boiler and DHW System Upgrade, Boiler Room Office Upgrade, remaining demolition and re-routing of utilities	3,943,366
7.	O'Donnell Heights	Emergency Repairs, Street lighting , Building lighting, and Pole Lighting; electrical distribution system assessment,	350,000

No.	Development Name	Description of Work	FY 2021 Planned Expenditures
		and component repairs and/or replacements	
8.	Cherry Hill	Roof Replacement (Maintenance Shop), Install Sump Pumps, Re-Pipe Heat Exchangers, heating distribution system pipe replacement	1,535,856
9.	Brooklyn Homes	Electrical Distribution Replacement, Install Window Security Screens	2,058,550
10.	Westport	Window Replacement, Parking Lot, Install Security System w/ Cameras, Erosion Control, Repair Concrete Steps on Grounds and Unit, Site Road Repairs, Daycare Building Demolition	2,152,481
11.	Mt. Winans	Basements Condensation, Install Efficient Interior Lighting, Install Electric Meters & Tenant Surcharges, Install Natural Gas Meters & Tenant Surcharges, Install Water Meters & Tenant Surcharges, Photovoltaic Power Generation (PV)	306,883
12.	Rosemont	Emergency Repairs	100,000
13.	Dukeland	Emergency Repairs	50,000
14.	Somerset Ext	Redevelopment Phase II (Somerset 2) 197 Units, Phase IV (Somerset 3) 64 Units	3,882,890
15.	Scattered Sites	Roofing Replacement, Vacancy Renovation, Basement Waterproofing, Window Replacement, Limited Lead-Free Painting, Emergency Repairs, Metering, Installing Water Fixtures, Installing Thermostats, Lighting, Replace Water Heaters, Furnaces, Refrigerators, Stoves	8,806,886
16.	Authority-Wide	Replace Kitchen Cabinets, Countertops, Bathrooms Cabinets and Sinks, Replace Windows, Electrical Work, Mechanical Work, Non-Dwelling Structures, Management and Maintenance Facilities	4,451,417

No.	Development Name	Description of Work	FY 2021 Planned Expenditures
		Improvements, Vacancy Renovation, Install Playground, Site Improvements	
17.	NEDS	Incentives for Non-Elderly Disabled Units (Bailey 10)	1,407,385
18.	AHI	Affordable Home Ownership (BRHP)	1,458,767
19.	Arbor Oaks, Townes at The Terraces	RAD Subsidy	209,415
20.	Latrobe, Poe Homes, Gilmor Homes, Cherry Hill Homes, Brooklyn Homes, Westport(EPC 1 Sites)	Sub Metering Maintenance and Service	40,000
21.	Authority-Wide	A & E and Environmental Consulting Fees	220,000
22.	Authority-Wide	Legal, Planning, Information Technology and Utility Consulting Fees, etc.	1,767,081
23.	Central Office	Technical Salaries and Benefits	1,376,383
24.	Central Office	Non-Technical Salaries and Benefits	1,471,543
25.	Central Office	Resident Meetings and Training	41,250
26.	Central Office	Admin and Operating Costs, Overhead, Sundry and Audit Fees	532,389
27.	Central Office	Debt Service - 1st Phase EPC	3,993,667
<b>GRAND TOTAL</b>			<b>48,801,619</b>

**Table 5: Planned Capital Expenditures During the Plan Year**

*504 Accessibility Improvements*

As of December 31, 2018, 758 units that meet the UFAS requirements for wheelchair accessibility have been created and certified under the Bailey Consent Decree. In FY 2021, HABC will continue to: (i) maintain existing UFAS units, common areas and accessible routes to ensure continued compliance with UFAS and the 2010 ADA standards; and (ii) modify units to meet reasonable accommodation and immediate need requests.

All of HABC's mixed population properties have been converted to private ownership and management under the RAD Program. The new owners have renovated or are renovating the units and common areas. Several of the properties have added more UFAS units resulting in an increase of 39 certified UFAS units. All of the units in the RAD properties that are subsidized by Project Based Rental Assistance (PBRA) are occupied exclusively by residents on HABC's reasonable accommodation transfer waiting list and from HABC's public housing application waiting list.

*Infrastructure and Extraordinary Maintenance*

In FY 2021, HABC will: (i) continue to develop master plans which note physical areas of concern and a course of action to rectify them (landscaping, egress, hazards, etc.); (ii) perform major renovations at various developments and a portion of the scattered site inventory to further reduce vacancies; and (iii) repair/replace 504 ramps. In addition, in FY 2021 HABC will continue to: (i) study the conditions of its scattered sites portfolio to determine long-term planning goals; (ii) investigate and repair drainage and erosion problems at various sites; (iii) address trip hazards; (iv) implement its environmental program that includes the continued testing for lead based paint and abatement of asbestos as required; (v) the implementation of safety and security measures to include fiber installation, security monitors, locks, doors and closed circuit television (CCTV) cameras and (vi) the continuation of energy and/or utility efficient initiatives and projects. HABC will continue its program of capital improvements using a prioritized needs list based upon available funding.

Major initiatives planned in FY 2020 to be completed in FY 2021 are the site improvement and/or development in the areas at Gilmor Homes as a result of the demolition of six walkup buildings; the window repairs/replacement at McCulloh Homes; the installation of sump pumps in crawl spaces at various developments; upgrades to the Gilmor boiler and heating/hot water distribution system; site backflow preventers at McCulloh Homes; upgrade to the supplemental electrical baseboard heat at McCulloh Homes Extension (townhomes) ; the replacement and/or



upgrade to critical components of the overhead electrical distribution system at O'Donnell Heights; additional building, street and pole lighting at O'Donnell Heights; the conversion of a unit at Poe Homes into a 504 compliant resident meeting space; roof replacement of the maintenance shop at Cherry Hill Homes; heating system upgrades to include heating distribution pipe replacement and re-piping heat exchangers at Cherry Hill; window replacement project and the replacement of a roof top air conditioning unit at Westport Homes; and mitigation of basement condensation at Mt Winans.

Additionally, major project work underway or planned in FY 2020 to be completed in FY 2021 includes the continuation of the demolition/deconstruction of six apartment style walk-up buildings (132 units), subsequent re-routing of utilities serving Gilmor Homes and the redevelopment of the open space with the assistance of state demolition grant funding; window replacement at Gilmor Homes; the replacement of roofs at various scattered sites; and the continuation of lease hold improvements at the Benton Building and at 709 E. Eager St. (including designing and constructing a parking lot for employees and program participants) due to staffing and reorganization efforts; heating, electrical and structural upgrades at the Duncanwood facility; the installation domestic hot water generators and a combined heat power (CHP) system at Douglass homes; replacement of the exterior building electrical cabinets at various developments; upgrading lighting in crawlspaces at various developments; paving and concrete repairs at O'Donnell Heights and Brooklyn Homes; landscaping, site work and erosion control at Cherry Hill; and the replacement of Heating, Ventilation and Air Conditioning units (HVAC) as needed at Cherry Hill 17; and the replacement of exterior doors and the installation of additional security screens at Brooklyn Homes.

Major work in FY 2021 may include renovations at Latrobe, McCulloh, Douglas, Gilmor, Cherry Hill, Westport, Brooklyn and various scattered sites. Other related work to be completed will be painting, interior units, construction and finishes as well as kitchen and bathroom upgrades at these HABC family and targeted scattered sites. Windows are an ongoing capital constraint for the Agency. However, HABC plans the replacement of windows and re-caulking of windows at developments as well as some security screens for windows as the need is identified. HABC has planned for some emergency work as needed at Perkins Homes, Rosemont Homes, Dukeland Homes, Oswego, , O'Donnell Heights, Laurens House, Carey House, Spencer Gardens, Shipley Hills and Poe Homes. There will also be a focus on basement water proofing in various scattered sites units and Mt Winans as needed. As part of the Green Physical Needs Assessments, HABC has completed a needs assessment for the scattered site inventory. HABC will assess the viability of each unit based on condition, neighborhood, typology and redevelopment opportunities, including affordable homeownership, RAD, mixed financed, etc. Decisions will be made to keep the units in HABC's inventory or dispose of them for one of the opportunities previously mentioned.

In general, HABC will conduct environmental, electrical, mechanical and/or architectural studies for aged infrastructure and developments. In FY 2021, HABC will plan for agency-wide electrical studies for electrical systems at various developments and especially the overhead electrical distribution system. Those studies could result in various levels of electrical system work depending on the extent of the work and available funding. As a practical matter and one of safety, the crawl space lighting will be upgraded at all of the applicable sites. Outdated and failing outdoor electrical cabinets outside of the buildings at various developments will be replaced to maintain safe and secure housing for the electrical system.

HABC will assess foundation construction to address water infiltration, flooding and run off at various developments as needed such as Brooklyn Homes, Latrobe Homes, McCulloh Homes, , Douglass Homes, Gilmore Homes, Cherry Hill Homes, Mt Winans and Westport Homes. The agency will address the replacement of water, sewer and sanitary lines at any developments as the need is identified. Site improvements will be made as necessary and to the extent allowed by available funding. Repairs to the HABC owned alleys, roads and sidewalk will be addressed as needed. HABC has designated some funds to address playground structural issues and/or initiatives as the need arises.

Ongoing major system needs are distribution piping systems, along with boiler room upgrades and heating/energy management systems assessment/replacement at all sites. Heating systems at family developments are undergoing boiler room and heating/hot water distribution system overhauls and/or efficiency upgrades as needed. This will also include replacement and/or upgrades to the Energy Management Control System (EMCS) at various developments. Additionally, the EMCS building control panels at Latrobe Homes will be relocated from the crawl spaces to the exterior of the buildings to prevent the excessive exposure to moisture and damaging conditions. Underground heating piping repairs began in FY 2020 and will be addressed as prioritized in 2021. Heating loop pumps and high temperature sump pumps will be installed where necessary to reinforce the heating system and protect the heating equipment. The domestic hot water generators that were installed in 2020 at Douglass Homes will be integrated with the new Combined Heat Power (CHP) system to be designed and installed in 2021.

HABC's environmental program will continue to implement the initiatives as outlined with the award of the HUD 2019 Lead Hazard Reduction grant award with lead based testing at Douglass Westport, O'Donnell Heights, Brooklyn, and Latrobe as well as plans to convert Douglass Homes into a complete lead free site. HABC will also continue with routine environmental efforts that include testing for lead based paint and abatement of asbestos as required. HABC will maintain compliance with EPA requirements for training and certification. HABC, along with various consultants and regulatory guidance, has created routine gas, lead, UST, mold, asbestos as well as training and monitoring updates as well as gas piping replacement projects and mapping at

various locations. As part of the monitoring and compliance obligations, HABC will address gas piping projects and mapping at various locations as needed. HABC will continue its testing for lead based paint, the abatement of asbestos as required and will continue to respond to all other environmental concerns.

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

#### *Special Construction and Demolition/Disposition of Public Housing Units*

HABC received HUD approval to demolish 132 walk-up units at Gilmor Homes. All six buildings will be demolished in 2020 with the utility re-routing being finalized by early 2021. The vacant space left by this demolition will be assessed for viable options as to how the space will be developed. These options will be discussed and planned in conjunction with the Gilmor Homes residents.

Due to its obsolescence and some environmental concerns, HABC will also demolish the long-term vacant, 7200 square foot, daycare center at Westport Homes in 2021. The structure is in poor condition and HABC's capital fund is inadequate to rehabilitate the building for future use.

#### *Energy Performance Contracting & Resident Billing / Metering*

HABC will continue monitoring, measurement and verification efforts for the Phase I Energy Performance Contracting (EPC) properties (Latrobe, Cherry Hill, Gilmor, Westport and Brooklyn). A second EPC Program of approximately \$10.1 million is halfway completed for the installation of conservation measures including lighting, water conservation fixtures, utility metering and system upgrades at selected properties (Douglass Homes, McCulloh Homes Low Rise, McCulloh Homes Townhomes, Mt. Winans, and approximately 600 scattered sites. The second EPC is planned for a total of 15 years, and was amended to three years of construction and ECM installation. Design, construction and ECM installation began in the second quarter of FY 2019. Pursuant to the EPC strategic plan, HABC re-negotiated Veolia steam contracts for service to Douglass Homes and Cherry Hill Homes. As part of the EPC II, there will be an integrated CHP to support hot water and electrical demands at Douglass Homes ,upgrades to parts of the McCulloh gas distribution system, assessment and installation of Photovoltaic electrical system at Mt. Winans and McCulloh townhomes and the replacement of refrigerators, stoves, furnaces and hot water heaters as needed at specific scattered sites.

The Energy Department oversees and manages the Resident Billing & Metering Program. HABC contracted with a third-party utility billing company to administer and process resident excessive consumption charges in early FY 2018. The company will continue the efforts with the properties

in the first EPC and absorb the Phase II EPC properties once the metering or sub-metering infrastructure is in place. HABC's Energy Department will oversee this company in close collaboration with other agency departments. Additionally, the Energy Department will ensure all Utility Allowances & Excessive Consumption Charges (ECC) updates are performed for the developments under the EPC program. HCVP Section 8 Utility Allowances will also be reviewed and updated under the purview of the Energy Department. The Energy Department maintains meter service agreements with contractors to service the EPC sub meters.

The Energy Department employs various means of communicating with HABC residents the importance of conserving energy and/or utilities. These methods include and are not limited to the following: Energy information brochures and pamphlets; direct calls or emails to respond to questions about energy billing; videos and other electronic media highlighting real life scenarios involving energy/utility conservation and online and/or kiosk access to resident utility data for real time access to energy consumption. The Energy department plans a new production of the Eye on Energy video series in 2021. Energy Information Kiosks remain in operation at three locations: Benton Building, Latrobe and Cherry Hill Homes. Residents also have access to the Energy Hotline(via phone) and Energy email to communicate questions, issues and concerns to a central location.

### *Safety & Security Initiatives*

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

HABC continues its partnership with MOCJ, BCIT and BPD-Homeland Security Division. Through this collaboration, HABC performs ongoing reviews for the useful life and operation of camera equipment and gunshot technology at Cherry Hill, Gilmor, Latrobe, McCulloh, Poe and Brooklyn Homes. Camera maintenance, safety and security concerns and safety grants are some of the work performed as a result of these partnerships. The maintenance agreement for 178 cameras was extended through June 2021. Camera equipment currently at Perkins Homes will be removed during various stages of development and utilized to supplement the wireless spare parts needed to support the remaining wireless cameras in HABC's inventory.

This partnership also seeks opportunities to apply for private and governmental grants for the implementation of new cameras and security lighting at all sites. HABC will apply for the 2020

Department of Housing Safety and Security Grant for Douglass Homes. The grant typically covers the installation of security cameras, security lighting and some fiber optic cable installation. The work is critical to fighting and deterring crime in key areas at HABC developments. Fiber installations are being evaluated for possible implementation at all sites to increase data connectivity/reliability and camera operations. A security operations center is being scoped, designed and constructed in 2021 to include multiple monitors, server storage and connectivity to all of HABC's CCTV Cameras and related systems.

### Facilities & Real Estate

HABC will continue to assess and prepare to renovate key HABC Maintenance Facilities across the various developments. The renovation of the old daycare center at Latrobe Homes is planned as a maintenance staff work and storage space. There is ongoing maintenance and upgrades of leased space at Benton Building and the West Pratt Street or Mount Clare Junction facilities. HABC leases the space at Duncanwood and is currently negotiating a long-term lease when the current one expires in 2022. Once the new lease is finalized upgraded heating, electrical, plumbing and structural design and construction will be planned for the Duncanwood facility. HABC will renovate space in the Benton Building to house a command center for the management of Security Operations across HABC developments and facilities. HABC is also reviewing the viability of the community building at Brooklyn Homes.

## 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.

In addition to the projects noted below, HABC is also pursuing opportunities to preserve and develop affordable housing for low-income households, and as such, other development initiatives may occur in FY 2021.

### O'Donnell Heights

The O'Donnell Heights public housing development was constructed in 1942 and included 900 public housing units. Of the original unit count, 760 have been demolished and 230 public housing units remain. The redevelopment of O'Donnell Heights is proceeding in four main phases, some with sub-phases.

The developer has completed the first phase, consisting of two sub-phases, identified as Phase 1A and 1B. Renamed Key's Pointe, Phase 1 includes 143 affordable units. The six single-family lots that were included in Phase 1 will be developed for future homeownership and were submitted for disposition to HUD in FY 2020.

Planning for Phase 2, consisting of 27 vacant acres, is underway and will incorporate recommendations from a neighborhood revitalization plan that was undertaken jointly by HABC and Baltimore City Planning Department for O'Donnell Heights and three adjacent communities.

This revitalization plan was approved by the Baltimore City Planning Commission in June of 2020. The completion of the revitalization plan will strengthen the developer's application to the State for 9% LIHTC in 2021, as points are given to developments located in communities with an existing revitalization plan. A disposition application for the Phase 2 site area is planned for submission to HUD in FY 2021.

#### [Bailey Supplemental Decree Units](#)

Ten additional units for non-elderly persons with a disability will be created through the acquisition and rehabilitation of units in neighborhoods identified in the Bailey Supplemental Decree. Acquisition of these units from the private market was delayed as a result of the COVID-19 pandemic and higher home prices than anticipated which meant the cost of renovation would have exceeded Total Development Cost (TDC) approved for this project. With a lifting of some of the COVID-19 restrictions and HUD's September 21, 2020 approval of a TDC waiver, acquisitions will get underway again in the 4<sup>th</sup> quarter of 2020 and be completed by year end 2021.

#### [Thompson Settlement Agreement](#)

Under 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. Under this initiative, BRHP's goal is to create 30 new project-based units in Communities of Opportunities in FY 2020 twenty (20) of which will be located in scattered sites units in high-opportunity areas throughout the region and the remaining ten (10) units are planned as part of the new construction being built

in Towson, Maryland called Red Maple Place. Red Maple Place will contain 56 units, 10 of which will have BRHP project-based units.

#### *Hollander Ridge HOPE VI Project*

HABC has acquired 94 scattered site units in Baltimore City as identified in the Thompson Settlement Agreement and will rehabilitate these units. The units will initially be public housing rental units. At least 5% of the units acquired under the Hollander Ridge Revitalization Plan will meet federal accessibility requirements for wheelchair users, and HABC will also require the developer to make 2% of the Hollander Ridge units hearing/vision compliant. HABC is determining which units will be wheelchair accessible.

Approximately \$18.85 million of HOPE VI funds that were originally designated for the redevelopment of the Hollander Ridge site were used to acquire the properties that will be replacement housing for both former Hollander Ridge residents and former or current O'Donnell Heights residents as well as cover administration, relocation and consultant fees.

The mixed-finance closing occurred in the 2<sup>nd</sup> quarter 2020 and early start of the rehab of Hollander Ridge properties began in February 2020. All units are expected to be completely renovated and leased up by the 1<sup>st</sup> quarter 2021. HABC plans to convert the 94 Hollander Ridge units to project-based rental assistance under RAD in 2021.

#### *Perkins Somerset and Oldtown Transformation Plan*

HABC and the City of Baltimore were awarded a \$30 million Choice Neighborhoods (CN) grant in July 2018 to support the Perkins Somerset Oldtown (PSO) Transformation Plan. The PSO Transformation Plan includes the demolition of the existing 629 Perkins Homes public housing units and the creation of 1,886 units of mixed income housing on the Somerset and Perkins public housing footprint and two adjacent properties owned by the Mayor and City Council of Baltimore to be completed in phases. The 1,886 units mentioned above includes 652 replacements units; 369 market rate units and 329 Low-Income Housing Tax Credit (LIHTC) units plus the two additional 80/20 buildings that are comprised of 429 total market rate units and 107 LIHTC serving 50% AMI or less.

HABC received disposition approval for the vacant 8.64-acre Somerset site in September 2018 and will submit demolition and disposition applications to HUD for Perkins Homes in the 4<sup>th</sup> quarter of 2020 for the first 100 units (Perkins Phase 1 (Block A)). The demolition and disposition applications for the remaining 529 units will be submitted in FY 2021. HABC received HUD approval in FY 2019 to convert all 629 public housing units at Perkins Homes under RAD in connection with a multi-phased replacement housing project.

HABC intends to replace all of the existing Perkins UFAS units certified under the Bailey Consent Decree. In addition, the developer will provide a minimum of 7% additional mobility UFAS units pursuant to the Bailey Consent Decree and 2% hearing/vision UFAS units as per the PSO Choice award, as required by law.

The Somerset Homes public housing site is being redeveloped in three phases and includes an additional phase (Somerset 3) to be completed off-site on an adjacent parcel owned by the Mayor and City Council of Baltimore that will be conveyed to HABC. HABC will convey the Somerset Homes site in phases to a single purpose entity controlled by Somerset Redevelopment, LLC. A total of 490 rental units will be constructed on the Somerset Homes site, consisting of 239 deeply affordable units (PBV and RAD PBV), 158 LIHTC units at 80% or less of Area Median Income and 93 market rate units. The off-site parcel will include an additional 72 mixed-income units, of which 20 are market rate units, 16 are LIHTC units and 36 RAD PBV and PBV units. The redevelopment of Somerset Homes also includes the construction of a new community park, known as North Central Park, and a network of new public streets resulting in a more pedestrian friendly, walkable community. Construction of the 104-unit first phase began in July 2019. Construction of Somerset 1, with 104 rental units should be completed by year end 2020, followed by the projected financial closings for Somerset 2 in November of 2020 and Somerset 3 in December 2020.

The replacement units on the Perkins public housing site and an adjacent City owned school site to be conveyed to HABC/BAHD, will be redeveloped in five phases. It will include a total of 788 units, comprised of 377 replacement units which will be a combination of RAD PBV and PBV, 256 market rate units and 155 LIHTC units as part of the CN Housing Plan. An additional two phases have been added since the original CN plan was approved, one on the aforementioned school site (Block I west) and one on the Perkins site (Block D), providing an additional 429 market rate and 107 LIHTC units, also known as the two 80/20 buildings.

Demolition of the first 100 units at Perkins will begin before the end of 2020, subject to HUD approval. The remainder of the units are anticipated to be demolished in FY 2021 through 2022.

For those phases in Somerset and Perkins that will be financed with multifamily housing bonds and 4% Low Income Tax Credits, 25% of the CNI replacement units will be subsidized with project-based vouchers and the remaining 75% of the CNI replacement units will be converted under RAD PBV.

### [Poe Homes](#)



HABC received a \$1.3 million HUD Choice Neighborhoods Planning & Action Activities Grants in September 2018 to support the planning of a financially feasible mixed-income redevelopment strategy for Poe Homes. Poe Homes consists of 288 public housing units that will be converting to a PBRA under the RAD platform.

An RFP was issued for the Master Planning and Real Estate Development Services for the Co-Development, Ownership and Operations of New Mixed-Income Housing at the Poe Homes public housing site in March 2019. A developer was selected in May 2019. HABC delivered a Choice Neighborhood Transformation Plan to HUD on September 3, 2020, which included a housing plan for the Poe Homes property.

The other component of the Choice Neighborhoods grant was for “Action Activities” i.e. capital improvement funds for projects in the Poppleton and Hollins Market neighborhoods near the Poe Homes property. The Action Activities grants are intended to sustain momentum during and after the 2-year planning process. HABC submitted the top-five scoring Action Activity proposals to HUD on June 4, 2020.

As of this writing, HUD sent an initial response to HABC with clarification questions about the 5 proposals. Overall, HUD is pleased and intrigued by the proposals (see below for a brief description of each proposal). HABC anticipates a final determination from HUD on grant awards by December 2020:

- Action Activity 1: Greater Model Park – new Splash Pad;
- Action Activity 2: Residential Façade/Aging in Place Grant Program for existing low-income homeowners in the Poppleton/Hollins Market neighborhoods;
- Action Activity 3: Hollins Market – Phase 3 of the planned redevelopment;
- Action Activity 4: Food Retail Initiative along and near the West Baltimore Street commercial corridor; and
- Action Activity 5: Healthy Corner Store Initiative (another food retail initiative).

## **B. Leasing Information**

### **i. Planned Number of Households Served**

Table 6 provides information on the MTW households projected to be served by HABC staff as of the end of FY 2021.

**Table 6: Planned Number of Households Served at the End of FY 2021**

Planned Number of Households Served Through:	Planned Number of Units Months Occupied/Leased	Planned Number of Households to be Served
MTW Public Housing Units	49,077	5453
MTW Housing Choice Vouchers (HCV) Utilized*	177,252	14,771
MTW Thompson Housing Choice Vouchers**	52,152	4,357
Local, Non-Traditional: Tenant-Based	N/A	N/A
Local, Non-Traditional: Property-Based	N/A	N/A
Local, Non-Traditional: Homeownership	N/A	N/A
<b>Planned Total Households Served</b>	<b>278,481</b>	<b>24,581</b>

*\*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 6A: 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	N/A	N/A
Property-Based	N/A	N/A	N/A
Homeownership	N/A	N/A	N/A
<b>Planned Households Served – Local, Non-Traditional Programs</b>		<b>N/A</b>	<b>N/A</b>

Table 7 provides information on Non-MTW vouchers projected to be leased during FY 2021. This table is not a requirement of Attachment B to the Standard MTW Agreement.

**Table 7: Planned Number of Non-MTW Households Served at the End of FY 2021**

Planned Number of Households Served Through:	Planned Number of Unit Months Occupied/Leased	Planned Number of Households to Be Served
NEDs II	456	38
VASH	6,600	550
FUP	1,188	99
Section 8 Mod/Rehab	1,200	100
<b>Planned Total Number of Non-MTW Households Served</b>	<b>9,444</b>	<b>787</b>

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	<p>HABC has undertaken several initiatives to decrease applicants' time on the waiting list and therefore lease families faster and more efficiently.</p> <p>HABC s updated its Interactive Voice Response System (IVRS). Now, applicants who call HABC cannot only find out the status of their public housing application, they will also be able to speak with an Account Review Specialist if they have additional questions.</p> <p>Leasing numbers decreased during 2020 due to COVID-19. Few families moved out and during the shutdown very few families were leased. Once COVID-19 waivers are lifted and PHA's are able to complete evictions, anticipated vacancies will negatively influence the number of families served for the year. HABC is currently making extreme efforts to place residents on payment plans in order to mitigate the effects of the pandemic.</p> <p>Lastly, HABC signed a Memorandum of Understanding (MOU) with the Baltimore City Police Department. Under the MOU, HABC is able to obtain more police reports concerning criminal activity on public</p>

Housing Program	Description of Anticipated Leasing Issues and Possible Solutions
	housing property. This may increase the number of evictions due to criminal activity and non-compliance with HABC's Dwelling Lease.
MTW Housing Choice Voucher	Under its ACC, HABC's HCVP-MTW funding limits the number of households for which assistance can be made available to no more than approximately 14,800 (this funding limitation does not affect Thompson- MTW, HUD-VASH, New Construction or Moderate Rehabilitation vouchers). Uncertainty concerning the level of available HAP funding to be provided to HABC for CY 2021 is an additional contributing factor in determining projected utilization.

## 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 Housing Choice Voucher Units: Tenant-Based	Community Wide	20,513	Open	N/A
Federal MTW Housing Choice Voucher Units: Project-Based	Site-Based	6,473	Partially Open	HABC opened the Senior PBV Waiting list on 10/05/20 which will remain open through 06/30/21.
RAD Choice Mobility	Program Specific	3,714	Open	N/A
Federal MTW Public Housing Units	Community Wide	10,505	Open	No. The Public Housing waiting list was closed on

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
				12/20/19. There are no plans to open it in FY 2021.
Thompson Vouchers **	Program Specific	13,812	Closed	No

*\*HABC purged the public housing waiting list in FY 2019; therefore, the number of households on the waiting list has decreased significantly.*

*\*\*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	HCVP plans to open the Project-Based Senior Waiting List through June 30, 2021 – online preliminary applications only.
MTW Public Housing Waiting List	Revisions were made to provide a more accurate description of unit offers to applicants eligible to be on both the waiting list for mixed-population buildings and for family developments .
RAD Choice Mobility Waiting List	In FY2021, HCVP anticipates setting aside approximately 115 vouchers for the Choice Mobility option. The number of vouchers set-aside for FY2021 is dependent on FY2020 attrition.

### III. Proposed MTW Activities: ALL

This section of the MTW Annual Plan provides information on new MTW activities proposed for FY 2021. HABC's numbering format includes the year the activity was proposed and a number which starts each year at "1" with successive MTW activities in the same year following as 2, 3, and so on.

#### Activity #2021-01: Emergency Waivers

##### Description of MTW Activity

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 proposes to 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:** HABC will waive the requirements of the verification hierarchy and accept self-certification of income and expenses for regular and interim reexaminations. Where HABC is able to access EIV, HABC will use the EIV income report to verify and calculate SS and SSI benefits as well as Medicare insurance premiums. This waiver applies to the PH and HCV programs.
- 3. Enterprise Income Verification Monitoring:** HABC will waive the requirement to monitor, on a monthly/quarterly basis, the Deceased Tenant Report, the Identity Verification Report, the Immigration Report, IVT Report, the Multiple Subsidy Report and New Hires Report. This includes preserving and responding to past reports. HABC will resume reviewing and addressing discrepancies identified in these reports as resources allow; however, the waiver will apply until the emergency designation has been lifted. This waiver applies to the PH and HCV programs.
- 4. 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.
- 5. 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.
- 6. 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.

7. **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.
8. **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.
9. **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.
10. **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.

### Statutory Objective

This activity will reduce cost and achieve greater cost effectiveness in Federal expenditures. The time and labor cost related to completing the backlog of delayed transactions and inspections while maintaining current deadlines is such that it would place an onerous burden on the agency.

### Implementation

HABC will implement this policy upon approval of the MTW Plan.

### Metrics

CE #1: Agency Cost Savings *				
Unit of Measurement	Baseline*	Benchmark*	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease)	\$347,196	\$173,598		
	15,168 hours x \$22.89/hour	7,584 hours x \$22.89/hour		



*\*The baseline reflects the cost of completion of all PH and HCV regular reexaminations for a one-year period. The benchmark reflects the cost of completion of one-half the number of PH and HCV regular reexaminations in a one-year period.*

<b>CE #2: Staff Time Savings</b>				
<b>Unit of Measurement</b>	<b>Baseline*</b>	<b>Benchmark*</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Total time to complete the task in staff hours (decrease).	15,168	7,584		
	10,112 recerts x 1.5 hours	5,056 recerts x 1.5 hours		

*\*The baseline reflects the time expended on all PH and HCV regular reexaminations for a one-year period. The benchmark reflects the time expended for one-half the number of PH and HCV regular reexaminations in a one-year period.*

### **Need/Justification for MTW Flexibility**

With respect to public housing, this activity requires waiver of certain provisions of sections 3(a)(1) and 3(a)(2) of the 1937 act, 24 CFR 902 Subpart B, 24 CFR 966.4, 960.257, 960.259, 24 CFR 5.233 and 5.632 as found in the MTW Agreement Attachment C, Section C, Paragraphs 2, 4 and 11. With respect to HCV, this activity requires waiver of certain provisions of Section 8(o), Section 23 of the 1937 Act and 24 CFR 982.503, 982.516, 982.631, 984, 24 CFR Subpart I, 24 CFR 983 and 24 CFR 5.233 and 5.632 as found in the MTW Agreement Attachment C, Section D, Paragraphs 1, 2 and 5. These waivers are necessary to implement the various provisions of this activity so as to allow HABC to address the conditions presented by the declared emergencies.

## **Activity #2021-02: Special Homeownership Vouchers**

### **Description of MTW Activity**

HABC will utilize MTW authority 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 under HABC's MTW Section 32 Homeownership Plan. SHVs will differ from regular Housing Choice Voucher (HCV) Program vouchers in the following respects:

*Eligibility* – Eligibility for SHVs will be limited to low-income households participating in, and meeting the income and other criteria of, HABC's MTW Section 32 Homeownership Plan who are planning to purchase a scattered site unit from HABC or its authorized Purchase and Resale Entities. These households may be public housing residents, HCV participants or applicants from the public housing or HCV waiting lists.

*Eligible Units* – SHVs may only be used in conjunction with the purchase of an HABC scattered site unit offered through HABC’s MTW Section 32 program.

*Portability and Moves* – SHVs will not be portable and cannot be used to move to another homeownership or rental unit. The SHV assistance will end upon the SHV participant’s 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 will not be eligible for utility allowances.

*Housing Assistance Payments* – SHV participants will be required to pay at least 30% of adjusted household income as family share (total tenant payment) towards monthly homeownership costs. SHV assistance will be applied to either the first or second 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.

HABC projects that five (5) SHVs will be issued during FY 2021.

### **Statutory Objective**

This activity meets the MTW statutory objective of expanding housing choice by increasing access to affordable first time homeownership among low-income households.

### **Implementation Schedule**

HABC plans to begin implementation of this activity in FY 2021.

### **Metrics**

HABC will utilize internal reporting systems to collect and analyze data on the impact of this activity.

<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	5		
<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	5		

### **Cost Implications**

HABC projects that the average cost per SHV will be approximately equal to the current average cost of HCV vouchers. HABC projects that five (5) SHVs will be issued in FY 2021.

### **Need/Justification for MTW Flexibility**

This activity requires waiver of 24 CFR 982.625 through 982.643, as allowed under the MTW Agreement, Attachment C, paragraph D. 8.

### **Rent Reform/Term Limit Information**

Not applicable.

## **Activity #2021-03: Economic Stability, Growth and Transition Program for the Thompson Settlement Agreement**

### **Description of MTW Activity**

BRHP will develop an incentive program to increase the economic stability and growth of program participants, and to incentivize successful transition to homeownership. The program will be structured using a multi-track incentive model. In this model, milestones will be categorized into four tracks: education, career, financial health, and homeownership. Each track has specific eligibility criteria and participants will be able to choose which track(s) to participate in, depending on eligibility and funding availability. Participating families will 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. This multi-track approach will build 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.

The general parameters for incentive payments are as follows:

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

### Statutory Objective

This program will meet all of the statutory objectives of the MTW Demonstration Program:

- Reduce cost and achieve greater costs effectiveness in Federal expenditures;
- Give incentives to families with children where the head of household is working, seeking work, or is preparing for work by participating in job training, educational programs, or programs that assist people to obtain employment and become economically self-sufficient; and
- Increase housing choices for low-income families.

Cost reductions will be realized through Housing Assistance Payment decreases due to increased incomes of program participants enrolled in both the education and career tracks. One-time costs associated with the Financial Health and Homeownerships tracks will allow a participating family to transition to homeownership (without ongoing subsidy), allowing BRHP to serve a new family with low-income from the waitlist, a cost effective method for serving greater numbers of eligible households and increasing housing choices for the new family served. Similarly, incentivizing on-time tenant portion payments will increase landlord satisfaction with BRHP tenants, thereby easing recruitment of landlords with units in opportunity areas.

### Implementation Schedule

Upon approval from HUD, BRHP will develop and publish a governing plan for this program. Publicizing program availability would begin in early 2021, with the initial recruitment to occur in the second quarter.

### Metrics

<i><b>CE #6: Reducing Per Unit Subsidy Costs for Participating Households</b></i>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Average amount of Section 8 and/or 9 subsidy (or local, non-traditional subsidy) per	\$1,620	\$1,300		

household affected by this policy in dollars (decrease).				
<i>SS #1: Increase in Household Income</i>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
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 #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	150	Actual number of households receiving self sufficiency services after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
<i>SS #6: Reducing Per Unit Subsidy Costs for Participating Households</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average amount of Section 8 and/or 9 subsidy (or local, non-traditional subsidy) per household affected by this	\$1,620	\$1,300	Actual average subsidy per household affected by this policy after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.

policy in dollars (decrease).				
<b>SS #8: Households Transitioned to Self Sufficiency</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of households transitioned to self sufficiency (increase). The PHA may create one or more definitions for "self sufficiency" to use for this metric. Each time the PHA uses this metric, the "Outcome" number should also be provided in Section (II) Operating Information in the space provided.	0	15	Actual households transitioned to self sufficiency (<<PHA definition of self-sufficiency>>) after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
<b>HC #3: Decrease in Wait List Time</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Average applicant time on wait list in months (decrease).	63	75	Actual average applicant time on wait list after implementation of the activity (in months).	Whether the outcome meets or exceeds the benchmark.
<b>HC #5: Increase in Resident Mobility</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of households able	135	150	Actual increase in households able to	Whether the outcome meets or



to move to a better unit and/or neighborhood of opportunity as a result of the activity (increase).			move to a better unit and/or neighborhood of opportunity after implementation of the activity (number).	exceeds the benchmark.
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### **Cost Implications**

The activity may result in added costs associated with providing program participants with incentive payments, however, the expenses associated with the career track are structured to be cost neutral; thresholds for incentive payments are set so the cost of the incentive payment is less than the increase in tenant portion resultant of the income increase. Cost containment will be achieved through limiting slots per track, and if available, outside funds may be leveraged to offset expenses.

### **Need/Justification for MTW Flexibility**

BRHP will utilize the authorization provided to HABC in Attachment C, Section E, which covers authorizations related to Family Self Sufficiency. BRHP will further utilize the authorization provided to HABC in Attachment C, Section B, Subsection 1.b.iii for the provision of housing or employment-related services or other case management

## **IV. Approved MTW Activities: ALL**

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): BLANCA/CORLISS***

##### **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 \$2,000 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 \$2,000 in household gross income annually.

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

#### **Planned Non-Significant Changes:**

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

In FY 2020, HCVP initiated the online recertification process for 100% of all participants in the Program. This changed how recertifications are processed; but does not change the requirements necessary to complete a recertification.

#### **Planned Changes to Metrics/Data Collection**

No changes to metrics or data collection methods are planned.

#### **Planned Significant Changes**

No significant changes are planned.

<b>CE #1: Agency Cost Savings</b>				
<b>Unit of Measurement</b>	<b>Baseline*</b>	<b>Benchmark*</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Total cost of task in dollars (decrease)	<b>Biennial and Triennial</b>			
	PH: \$1,107,590 HCV: \$1,134,696	PH: \$237,391  3,086 biennial and triennial recertifications completed** 3,086 X 2.5 hours/recert X \$30.77/ hour = \$237,391  HCV: \$515,644  6,703 biennial and triennial recertifications completed** 6,703 X 2.5 hours/recert = 16,758 hours X \$30.77/ hour = \$515,644		
	<b>Limit on Interims</b>			
	HCV: Interims performed: 3,231 Time per interim: 45 min. Hourly wage: \$18.78 HCV cost on interims: \$45,509	HCV: Interims performed: 969 Time per interim: 45 min. Hourly wage: \$30.77 HCV cost spent on interims: \$22,362		
<i>*The baseline reflects pre-RAD conversions and therefore represents more households.  **The benchmark represents 50% of planned households served.</i>				

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: 16,758 hours  6,703 biennial and triennial recertifications completed X 2.5 hours/recert = 16,758 hours		
	Limit on Interims			
	HCV interims: 3,231 Time per interim: 45 min. HCV time on interims: 2,423 hours	HCV: interims: 969 Time per interim: 45 min. HCV time spent on interims: 727 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.				

## **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
- Waived the Requirement for Independent Entities to approve AHAP/HAP Contracts, renewal terms, rent determinations and inspections of HABC owned properties. HABC has combined the Project-Based Voucher Amendments to the HAP Contract activity under this Enhanced Project-Based Program activity. Approved and Amended FY 2020.

### **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.

- Establishment of an Agency MTW Project-Based Program:** In FY 2021, using its MTW authority under Attachment C, paragraph D.7. HABC will project-base Section 8 assistance at properties owned directly or indirectly by the Agency that are not public housing, however, the Agency recognizes and accepts that such units will no longer be eligible for operating subsidy provided under Section 9(e) of the 1937 Housing Act or for future capital funds provided under section 9(d) for those units when it chooses to use this authorization. Project-based assistance for such owned units do not need to be competitively bid, nor are the owned units subject to any required assessments for voluntary conversion.

### Planned Non-Significant Changes

Under Attachment C, paragraph D.7. HABC will develop and adopt a reasonable policy and process for project-basing Section 8 tenant-based leased housing assistance for units owned directly or indirectly by HABC.

### Planned Changes to Metrics/Data Collection

<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	464 units		
<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	167 households	464 units		
<i>HC #5: Increase in Resident Mobility(Agency Specific Metric)*</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).	167 households	541 households		

\*Metrics reflect the portion of the activity related to referrals from the MOHS and the number of PBV units owned by HABC.

### Planned Significant Changes

No significant changes are planned.

## Activity #2006-03: Thompson Biennial Recertifications: BRHP

### 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.

### Planned Non-Significant Changes

In FY 2020, the threshold for the age of documents received by BRHP will be extended from 60 days to 120 days.

### Planned Changes to Metrics/Data Collection

No changes to metrics or data collection methods are planned.

### 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. Reactivating this MTW FSS program activity will provide HABC with greater flexibility in designing an FSS Program that is responsive to the needs of its participating families. Specifically, HABC will encourage 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.

### **Planned Non-Significant Changes**

HABC will not implement the previously approved program feature related to changing the maximum FSS contract period from five to four years. HABC will add a requirement for FSS participants to open a bank account within the first year of participation in the program. All escrow payments will be made via direct deposit into the established account.

Also in FY 2020, HABC will implement 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 Changes to Metrics/Data Collection**

No changes.

#### **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 2017
- Incentive Payments to Landlords: Approved FY 2019

#### **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.

Further, BHRP expanded the assistance to Mobility Program participants to include one-time incentive payments to landlords' one-time apartment application fees and/or moving costs for families with a Thompson voucher, and ongoing counseling fees associated with the pre- and post-move counseling programs for the Mobility Program. This provision has not yet been implemented; however, BHRP may utilize this flexibility in the future.

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**

No changes to metrics or data collection methods are planned.

#### **Planned Significant Changes**

No significant changes are planned.

### **Activity #2009-01: MTW Homeownership Program**

#### **Plan Year Approved, Implemented, Amended**

This activity was approved in FY 2009, placed on hold in FY 2014, and reactivated and amended in FY 2020.

#### **Description/Update**

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

In FY 2020, HABC worked with the City of Baltimore to develop a revitalization plan and identify scattered site units in areas selected for revitalization. Pending selection of the units, where applicable, demo/diso applications will be submitted to HUD for review. Upon approval, HABC will commence with development of the scattered site homeownership properties, which will be available to homeownership eligible HCV and PH families.

In FY 2020, HABC modified a feature to its MTW Homeownership Program to ease the transition from subsidized homeownership assistance. HABC developed a schedule of decelerated assistance for an additional five years at the end of the family's applicable assistance term. 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;
- Year 4: 80% of the balance of the mortgage payment; and

In FY 2021, HABC will implement additional revisions to its Section 32 Homeownership Plan as described below.

### **Planned Non-Significant Changes**

In FY 2021, HABC will update and modify certain features of the approved Section 32 Homeownership Plan (referred to in this section as “the Plan”) including the following sections of the Plan. No additional MTW waivers are required to implement these changes:

*Eligible Purchasers* – In addition to public housing residents and HCV Program voucher holders, eligible purchasers may include applicants on the public housing and 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.

*Property Feasibility* – HABC will increase the limit on the scope of repairs and renovations from \$50,000 per unit 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.

*Soft Second Mortgages* – HABC will modify the soft second mortgage provisions of the Plan to require that soft 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.

*Recapture Provisions and Deed Restrictions* – HABC will modify the recapture formula provisions to remove soft second mortgages (see above) and to require recapture of portions of the appreciation during the first ten 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.

*Pre-Sale Costs, Closing Costs and Downpayment Requirements* – HABC will modify the Plan to indicate that 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.

*Purchase and Resale Entities (PRE)* – HABC will modify the Plan to allow for disposition of vacant scattered sites to PREs, subject to HUD disposition approval, in accordance with 24 CFR 906. PREs will be community partners with the legal and administrative capacity to carry out homeownership and resale activities. HABC will enter 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.

#### **Planned Changes to Metrics/Data Collection**

No changes are proposed to the metrics.

#### **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 to metrics or data collection methods are planned.

#### **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. In FY 2020, PBV Program units at the Greenmount and Chase will come on line using the flexibility in this activity.

#### **Planned Non-Significant Changes**

No non-significant changes are planned.

#### **Planned Changes to Metrics/Data Collection**

No changes to metrics or data collection methods are planned.

#### **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 will be re-inspected at least once every 25 months. Owners and families are allowed to self-certify that non-emergency items identified as "fail" during an HQS inspection have been repaired. Only units located in the allowable (non-impacted) areas are eligible for this option. The fail items must be minor and determined to be non-emergency to be eligible for self-certification. The self-certification process will require the owner and tenant family to certify that the repairs have been made. A random sample of units that have been approved under the self-certification option will receive a quality control inspection.

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**

No changes to metrics or data collection methods are planned.

### **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

### **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 shall be 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 also excludes all income from assets when the cash value of the asset is less than \$50,000. Additionally, for households where the cash value of the assets is less than \$50,000, BHRP will allow self-certification of asset value and income. This initiative will reduce the time it takes to verify income. This rent simplification measure will increase efficiency without having any negative impact on increasing residents' rent.

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

#### **Planned Non-Significant Changes**

In FY 2020, the following non-significant changes will be made to this activity:

- BRHP will calculate asset income by taking the market/face value of the family's assets and multiplying that value by the established passbook savings rate when the market/face value of the family's assets is in excess of \$50,000.
- In FY 2020, the hardship policy will be extended so that families may request the use of regulatory deductions and exclusions if adjusted income would be lower than adjusted income calculated using BHRP standard deductions. The request must be made within 14 calendar days of the notification of the change in family rent share.
- BRHP will calculate 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.

#### **Planned Changes to Metrics/Data Collection**

No changes to metrics or data collection methods are planned.

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

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

During FY 2020, HABC will use the flexibility under this activity when entering into LTA-PB contracts related to the PSO Transformation Plan.

## **Planned Non-Significant Changes**

No non-significant changes are planned.

## **Planned Changes to Metrics/Data Collection**

No changes to metrics or data collection methods are planned.

## **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 will be 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 rate.
- *Medical Expense Calculation Method* – HABC will calculate 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; and
- *Seasonal Income Calculation Method* – HABC will calculate 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.

### **Planned Non-Significant Changes**

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 will apply 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 will greatly reduce 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%.

### **Planned Changes to Metrics/Data Collection**

No changes to metrics or data collection methods are planned.

#### **Planned Significant Changes**

No significant changes are planned.

### **Activity #2019-02: Local Fair Market Rent**

#### **Plan Year Approved, Implemented, Amended**

Approved FY 2019; implemented January 1, 2019

#### **Description/Update**

Subject to funding availability, this activity will be implemented for both HABC's Leased Housing Program and the Baltimore Housing Mobility Program operated by the BRHP. 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 establishes 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.

HABC plans to implement this activity in FY 2020.

### **Planned Non-Significant Changes**

No non-significant changes are planned.

### **Planned Changes to Metrics/Data Collection**

No changes to metrics or data collection methods are planned.

### **Planned Significant Changes**

No significant changes are planned.

## **Activity #2020-4: Modified Rent Reasonableness & Rent Cap Policy** *(Formerly Modified Rent Reasonableness Policy)*

### **Plan Year Approved, Implemented, Amended**

- **Approved:** FY 2020
- **Implemented:** Planned for FY 2021
- **Amended:** FY 2021

### **Description of MTW Activity**

HABC will implement a modified rent reasonableness policy to better reflect market conditions and streamline the process for determining reasonable rent. HABC will engage an independent consultant to conduct a housing market analysis. The analysis will:

- Identify 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 will also be identified based on the factors above;
- Collect data on verified rents for unassisted units, by bedroom size, for each identified submarket; and
- Establish rent ranges based on data collected, which will include a low rent, high rent and average rent by bedroom size by identified submarket.

HABC will utilize the rent ranges, by submarket and by bedroom size, to determine rent reasonableness. 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 anticipated ceiling may be adjusted upon

completion of the Rent Study once the market rents have been determined in the opportunity areas. At that time, HABC will amend the activity for HUD approval prior to implementing a payment standard if higher than 135%.

HABC may also apply payment standard caps when and if funding restrictions arise. To ensure rents remain reasonable and consistent with market rate rents, HABC will update the market analysis every two years.

### **Planned Non-Significant Changes**

As a result of delays caused by the COVID-19 Pandemic, HABC has not yet completed and implemented the sub-market analysis and originally planned changes to the rent reasonableness policy. Accordingly, in FY 2021, HABC will modify this activity and its approach to rent reasonableness. Specifically, HABC proposes to place a 2.5% cap on annual contract rent increases for units where the tenant is already receiving HCV rental assistance. At contract renewal, HABC may limit the landlord's requested rent to the lower of 102.5% of the previous contract rent for the same tenant or the applicable payment standard.

Under this activity, HABC will conduct reasonable rent (RR) determinations on a random sample of the units where rent increases were requested. HABC will conduct the 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. HABC will use the number of units with requested rent increases as the universe with which to develop the sample. If the approved rent on more than 20% of sampled units, because of application of the policy, is not reasonable when compared with the RR determination, HABC will conduct RR determinations on double the initially established sample size. HABC will monitor outcomes and may modify this policy to ensure rents are reasonable and to ensure that the rent change ceiling is consistent with current market conditions and available funding, i.e. revise sample size requirements or increase the rent increase ceiling.

At which time HABC is ready to implement the originally planned change to the rent reasonableness policy, HABC will update the applicable MTW Plan. No additional MTW waivers are required to implement this activity.

### **Planned Changes to Metrics/Data Collection**

Metrics were updated to reflect 2020 data for non-significant changes as noted above.

### **Planned Significant Changes**

No significant changes are planned

## **Activity #2020-5: The Bailey 10 Total Development Cost Limit Policy**

### **Plan Year Approved, Implemented, Amended**

Approved FY 2020 and implemented FY 2020.

### **Description/Update**

In FY 2009, HABC developed a Cost Limit Policy for the acquisition and remodeling of 58 scattered site public housing rental units in non-impacted areas in Baltimore City and its surrounding counties as part of the 58 Unit Program, an obligation under the Thompson Partial Consent Decree. This MTW activity was approved by HUD in a letter dated March 12, 2009 but later closed once all 58 units were acquired.

The Bailey Consent Decree as amended by the Bailey Supplemental Consent Decree in 2015, requires that HABC produce ten (10) 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. In the development proposal, HABC cited MLS listings for one-bedroom units “requiring minimal to moderate renovation listed for between \$100,000 and \$150,000”. 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. HUD approved HABC’s development proposal for the Bailey 10 in a letter dated April 23, 2018 (the “HUD Letter”).

In searching for units to satisfy the Bailey 10 requirement, HABC has discovered that the acquisition and rehabilitation costs will likely exceed the proposed costs set forth in the initial budget and, in some cases, will likely exceed the HUD TDC. The neighborhoods in which the Bailey 10 may be located are comparable to the type of neighborhoods in which the Hollander units were acquired. Therefore, the costs for the acquisition and renovation of the Hollander Ridge nineteen one-bedroom units are reasonable predictors of the costs expected for the Bailey 10.

The nineteen one-bedroom Hollander units were purchased between May 2018 and May 2019 (See Appendix H). The purchase price for these units ranged from \$150,000 to \$215,000, with an

average price of \$172,079. The estimated cost to renovate these units ranged from \$9,842 to \$61,330 with an average cost of \$33,784. Soft costs associated with the average cost of acquisition and rehabilitation, such as consultants, fees, settlement costs, contingencies, and the like, are expected to add 20% (\$41,173 on average per unit) to the TDC. Based on this formula, which reflects costs in the local market, the total development cost is estimated at \$247,035 per unit.

The 2019 HUD TDC for a one-bedroom row house unit in Baltimore is \$186,292. HABC proposes a per unit TDC of \$247,035 in order to produce the Bailey 10, which represents a 33% increase over HUD's current TDC limits

#### **Planned Non-Significant Changes**

No non-significant changes are planned.

#### **Planned Changes to Metrics/Data Collection**

No changes to metrics or data collection methods are planned.

#### **Planned Significant Changes**

No significant changes are planned.

### **B. Not Yet Implemented Activities**

#### **Activity #2020-1: Housing Quality Standards (HQS) Modifications & Enhancements**

**Plan Year Approved: FY 2020**

#### **Description of MTW Activity**

HABC will use 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 will apply 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. An example of this provision is as follows:
  - Completed RFTA and inspection checklist are submitted by an owner on April 4.
  - HABC inspects the unit on April 10, and the unit fails inspection.
  - HABC will give the owner 15 days to correct the deficiency and conduct the first reinspection without charge to the owner.
  - If at that first reinspection, the unit fails for deficiencies found on the initial inspection that have not been corrected, HABC will issue the tenant a new RFTA.

- On April 30, the owner notifies HABC that the family is still interested in the unit and requests a second reinspection, advising that the deficiency has been corrected. HABC will confirm with the family that they are still interested.
- HABC will not reschedule the reinspection until the owner pays the reinspection fee.
- Upon receipt of payment for the reinspection fee, HABC reschedules the second reinspection for May 3.

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.

### Reason for Delay

Planned implementation has been delayed due to COVID-19. Delayed implementation is planned for 4<sup>th</sup> quarter 2020, or early 2021.

### Statutory Objective

This activity meets the MTW statutory objective in that it reduces costs and achieves greater cost effectiveness in Federal expenditures. By reducing the number of re-inspections and defraying the cost of re-inspections through levy of a reinspection fee, HABC will reduce overall inspection costs.

### Implementation Schedule

HABC will develop and implement a charge and payment system for HQS reinspection fees and provide owners with 60 days advance notice of implementation. It is anticipated that HABC will achieve full implementation of this activity by the third quarter of FY 2020.

### Metrics

HABC will utilize internal reporting systems to collect and analyze data on the impact of this activity.

<i>CE #1: Agency Cost Savings</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease)	Number of first initial inspection fails + second annual fails: 6,069  Total first inspection time: 6,069 * 1.65 hours per inspection = 10,014 hours	Number of first inspection fails: 5,462  Total first inspection time: 5,462 * 1.65 hours per inspection = 9,012 hours		

<b>CE #2: Staff Time Savings</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark*</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Total time to complete the task in staff hours (decrease)	Number of first initial inspection fails + second annual fails: 6,069  Total first inspection time: 6,069 * 1.65 hours per inspection = 10,014 hours	Number of first inspection fails: 5,462  Total first inspection time: 5,462 * 1.65 hours per inspection = 9,012 hours		
*HABC anticipates that implementation of a reinspection fee may result in a reduction in the number of re-inspections.				
<b>CE #3: Decrease in Error Rate of Task Execution*</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Average error rate in completing a task as a percentage (decrease)	0%	0%		
*HABC does not anticipate that implementation of a reinspection fee will result in a reduced error rate related to compliance with HQS; however, this metric is required by HUD for HQS related activities.				

## Cost Implications

Each initial, regular and reinspection requires staff time for scheduling and notifications, preparing for the inspection, driving to and from the unit for inspection, conducting the inspection, post-inspection paperwork and, where applicable, HQS enforcement. HABC anticipates the number of first initial inspection fails and second annual fails that require re-inspections will decrease by 10%.

## Need/Justification for MTW Flexibility

This activity requires waiver of 24 CFR 982.405, as allowed under the MTW Agreement, Attachment C, paragraph D. 5. Currently, regulations allow for reinspection fees after the first failed inspection and do not stipulate whether the PHA can refuse to complete a reinspection without first collecting the applicable fee. HABC will charge reinspection fees for existing units and for pre-contract unit that fail under the conditions stated above.

## Rent Reform/Term Limit Information

Not applicable.

## **Activity #2020-02: The Healthy Opportunities Program**

**Plan Year Approved: FY 2020**

### **Description of MTW Activity**

HABC will partner with the Baltimore City Health Department and other local organizations to implement the Healthy Opportunities Program (HOP). The initiative will be a mobility program designed around the collaboration between housing and health-care providers, who will work together to provide stable, affordable and healthy housing in opportunity areas to ultimately improve participants' health outcomes and overall quality of life. HABC will work 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 will be provided mobility counseling, which will include 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 50 families at any given time. Support and counseling will be 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.

### **Reason for Delay**

Planned implementation has been delayed due to COVID-19. Delayed implementation planned for late 2020, or early 2021.

### **Statutory Objective**

This initiative will support the MTW statutory objective of increasing housing choices for low-income families with children.

### **Planned Non-Significant Changes:**

Increasing number of potential families served from 50 to up to 150.

### Implementation Schedule

HABC will work with its partners in planning, developing and implementing this important program. In May 2019, HABC worked with BRHP to submit an application to the Kresge Foundation for a grant to fund the planning of this program. Upon approval from HUD, HABC will collaborate with applicable partners to identify potential HOP participants. HABC has issued an RFP for a third party to complete a housing market analysis to identify areas of opportunity. Once the analysis is complete, HABC will utilize the results in advising HOP participants of opportunity areas that address their health-related needs. It is anticipated that HABC will begin to enroll HOP participants towards the end of FY 2020.

### Metrics

HABC will utilize internal reporting systems to collect and analyze data on the impact of this activity.

<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	0		
<i>*HUD is requiring the use of this metric; however, HABC does not believe it is applicable in the context of this MTW activity, as the program will be not be developing new affordable housing.</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)	0	50		

<i>HC #7: Households</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households receiving services aimed to increase housing choice (increase)	0	50		

### **Cost Implications**

The activity may result in added costs associated with providing program participants with incentives to move, such as higher payment standards, security deposit and/or first month's rent assistance.

### **Need/Justification for MTW Flexibility**

HABC will utilize Attachment C, Section D, Paragraph 2 which covers Rent Policies and Term Limits and authorizes HABC to adopt and implement any reasonable policy to establish payment standards, rent or subsidy levels for tenant-based assistance. If needed, HABC will use single fund flexibility to support the mobility counseling services provided through the program.

### **Rent Reform/Term Limit Information**

Not applicable.

## **Activity #2020-03: Local Forms**

**Plan Year Approved: FY 2020**

### **Description of MTW Activity**

Under this initiative, HABC will create 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 Family Self-Sufficiency (FSS) Contract of Participation and Individual Training and Services Plan, the Request for Tenancy Addendum, the Tenant Based HAP Contract, and the Privacy Act Notice. Where the Privacy Act Notice is concerned, HABC will extend the expiration from 15 months to 36 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 must meet all applicable HUD requirements.

### Reason for Delay

Planned implementation delayed due to COVID-19.

### Statutory Objective

This activity addresses the statutory objective to reduce costs and achieve greater cost effectiveness in Federal expenditures by simplifying forms that are used by program staff and participants.

### Implementation Schedule

HABC will determine implementation and effective dates of local forms based upon the form type and transactions used. For example, a new RFTA would be implemented for all vouchers issued on or after the date the local version of the form is approved.

### Metrics

HABC is required to report on the metrics below for this activity; however, it is difficult to identify time savings when development of various local forms will each generate different time savings. Accordingly, HABC will use an average of .5 hour per new form and multiply that time by the approximate volume of utilization for each form. HABC will establish more specific metrics when the specific forms to be modified are identified and revised. HABC will utilize internal reporting systems to collect and analyze data on the impact of this activity.

<i><b>CE #1: Agency Cost Savings</b></i>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Total cost of task in dollars (decrease)	Not Tracked	Staff hourly rate: \$30.77  .5 hour/form X \$30.77/hour  \$15.39 per form		
<i><b>CE #2: Staff Time Savings</b></i>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Total time to complete the task in staff hours (decrease)	Not Tracked	.5 hour per form		

## **Cost Implications**

The proposed activity will provide cost savings as addendums to HUD forms will no longer be needed to reflect HABC MTW policies. The amount of savings is reflected in the metrics. HABC will use the savings to supplement activities identified under single fund flexibility.

## **Need/Justification for MTW Flexibility**

The following authorizations provide HABC with the flexibility to develop local versions of forms that are consistent with HABC's approved MTW policies regarding program transactions involving income, adjusted income, rent, leasing, etc:

Authorization at Attachment C, Section D.1.a allows agencies to "determine the term and content of Housing Assistance Payment contracts to owners." This authorization will allow HABC to make changes to the PBV and tenant-based HAP contracts consistent with the Attachment C authorization at D.1.a.

Authorization at Attachment C, Section D.1.c allows agencies to "define, adopt and implement a reexamination program that differs from the reexamination program currently mandated in the 1937 Act and its implementing regulations". This authorization will allow HABC to make changes to the Privacy Act Notice.

Attachment C, Paragraph E allows agencies a waiver of "certain provisions of Section 23 of the 1937 Act and 24 CFR 984 as necessary." The 984 regulations include the FSS Contract of Participation and the training plan. This authorization will allow HABC to make changes to the FSS Contract of Participation and the training plan.

HABC will also utilize Attachment C, Paragraph D(2)(b) which covers Rent policies and Term limits and authorizes HABC to adopt and implement any reasonable policy to establish payment standards, rent or subsidy levels for tenant-based assistance. If needed, HABC will use single fund flexibility to support the mobility counseling services provided through the program.

## **Rent Reform/Term Limit Information**

Not applicable.

## C. MTW Activities on Hold

### **Activity #2009-02: Section 811 Supportive Housing**

#### **Description**

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 and will require developers to demonstrate through specified documentation that the project has a gap that cannot otherwise be addressed.

This activity was approved in FY 2009 and placed on hold in FY 2014.

#### **Plan for Reactivating the Activity**

This activity was placed on hold in FY 2014 due to a lack of interest from developers. HABC does not intend to reactivate this activity and plans on closing the activity out in the FY 2019 Report.

#### **Explanation of Non-Significant Changes Since Approval**

In FY 2011, HABC proposed the following change to the approved Section 811 Activity: HABC may require that the Section 811 units be tenanted only by non-elderly persons with disabilities with active applications on HABC's HCVP waiting list. In these cases, property management of included units will request and receive referrals from HABC and will be required to offer tenancy to persons meeting site eligibility requirements in the order in which names appear on the referred list. For the purposes of meeting its obligations under the Bailey Consent Decree, these units will be counted toward the total number of required project-based units. An HABC-referred person who accepts an offer of tenancy at one of the included units will have his/her HCVP application placed in an inactive status for a minimum of one year from the date of occupancy of the unit. At the end of that period, the applicant may request reactivation of his/her application. HABC will then reactivate the application with its original application date.

### **Activity #2012-02: Direct Homeownership Program**

#### **Description**

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

This activity was approved in FY 2012 and placed on hold in FY 2014.

#### **Plan for Reactivating the Activity**

This activity was placed on hold in FY 2014 due to lack of participants. HABC does not intend to reactivate this activity and plans on closing the activity out in the FY 2019 Report.

#### **Explanation of Non-Significant Changes Since Approval**

No changes have been made since approval.

### **Activity #2018-01: Landlord Payment Methods and Electronic Communications**

#### **Description**

This activity has allowed HABC to require that all HCV landlord/owners receive all communications from HABC electronically and receive HAP payments via direct deposit only. Additionally, the activity gives HABC the authority to charge owners an administrative fee equal to 1% of the HAP in the event the landlord/owner opts out of the electronic delivery/direct deposit requirement and/or continues to receive paper communications from HABC in any given month. HABC considered a two-tiered fee structure: a 1% fee for paper copies of letters, notices, reports, etc. and another 1% fee for paper checks

The landlords will be notified and billed of such assessments through HABC's Accounts Receivable division. Landlords, who have fees assessed, will be required to submit payment prior to receiving HAP.

This activity was approved in FY 2018 and implemented in FY 2019. HABC has not yet implemented the surcharge policy and will continue to explore implementation in FY 2020.

#### **Plan for Reactivating the Activity**

As the majority of owners have moved to electronic communications, in FY 2020, HABC will determine the need for implementation of this activity.

#### **Explanation of Non-Significant Changes Since Approval**

No changes have been made since approval.

## 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 2020 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.
Payment Standards at the 50 <sup>th</sup> Percentile (Activity #2009-03)	FY 2009	FY 2011	HUD had adjusted the area Fair Market Rent (FMR) to the 50 <sup>th</sup> 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 <sup>th</sup> percentile FMR was being phased out. At the time the activity was closed, use of the 50 <sup>th</sup> percentile FMR was provided by HUD, and MTW authority was not needed.
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).

Activity	Plan Year Approved and Implemented	Close Out Year	Reason for Close Out
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.
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 Gilmor Homes; however, due to lack of funding and the on-going revisions of the Gilmor Homes rent policies, this activity was placed on hold in FY 2014. This activity was identical to the Gilmor

Activity	Plan Year Approved and Implemented	Close Out Year	Reason for Close Out
			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"> <li>• \$3,200 for households with wages</li> <li>• \$1,200 for households without wages</li> <li>• \$400 for any elderly or disabled family (to be combined with either of the above deductions)</li> </ul> <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 call 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 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	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



Activity	Plan Year Approved and Implemented	Close Out Year	Reason for Close Out
(Activity #2014-02)			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.
The Front Door Program (Activity #2015-03)	FY 2015	FY 2017	HABC partnered with the 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.

Activity	Plan Year Approved and Implemented	Close Out Year	Reason for Close Out
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	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	FY 2018	FY 2021	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. Sources and Uses of MTW Funds

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

### A. Estimated Sources and Uses of MTW Funds in FY 2021

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

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

#### i. Estimated Sources of MTW Funds

**Table 11: Estimated Sources of MTW Funds for FY 2021**

FDS Line Item Number	FDS Line Item Name	Dollar Amount
<b>70500 (70300+70400)</b>	<b>Total Tenant Revenue</b>	<b>\$ 18,965,187</b>
<b>70600</b>	<b>HUD PHA Operating Grants</b>	<b>\$ 306,526,362</b>
<b>70610</b>	<b>Capital Grants</b>	<b>\$ 22,021,969</b>
<b>70700 (70710+70720+70730+70740+70750)</b>	<b>Total Fee Revenue</b>	<b>\$ 0</b>
<b>71100+72000</b>	<b>Interest Income</b>	<b>\$ 716,273</b>
<b>71600</b>	<b>Gain or Loss on Sale of Capital Assets</b>	<b>\$ 0</b>
<b>71200+71300+71310+71400+71500</b>	<b>Other Income</b>	<b>\$2,512,002</b>
<b>70000</b>	<b>Total Revenue</b>	<b>\$ 350,741,793</b>

#### Notes to Sources:

1. Tenant Revenue is planned at a 97% occupancy rate. Total Tenant Revenue also includes estimated income billable from various tenant transactions such as warrant, court and maintenance costs anticipated during CY 2021.
2. HABC's Total Operating Grants of \$306,526,362 from HUD include the following funding estimates:

- Section 8 HCV Housing Assistance Payments (HAP) subsidies in the amount of \$145,480,828 for Regular HABC Vouchers; \$76,204,283 for Thompson Partial Consent Decree and Remedial Vouchers and \$5 million in MTW/HAP funds
  - Ongoing Administrative Fee Earned in the amount of \$15,038,682 (\$11,714,983 for Regular HABC Vouchers, \$3,323,699 for Partial Consent Decree and Remedial Vouchers)
  - Public Housing Subsidies of \$64,802,569 is budgeted based on an estimated 90% funding proration for the calendar year ending December 31, 2021.
3. Capital Grants funding of \$22,021,969 is based on planned capital improvement and construction activities as described in the Capital Improvement Plan.
  4. HABC does not report Fee Revenue as HABC has adopted a Local Asset Management Plan since FY 2010.
  5. Other Income is related to vending machines, excess utilities, tenant charges and antenna income from the public housing program. It also includes Fraud Recovery for the recovery of funds from the Section 8 HCV program.

ii. **Estimated Uses of MTW Funds**

**Table 12: Estimated Uses of MTW Funding for FY 2021**

<b>FDS Line Item Number</b>	<b>FDS Line Item Name</b>	<b>Dollar Amount</b>
91000 (91100+91200+91400+91500+91600+91700+91800+91900)	Total Operating – Administrative	\$ 39,819,147
91300+91310+92000	Management Fee Expense	\$ 82,248
91810	Allocated Overhead	\$ (264,883)
92500 (92100+92200+92300+92400)	Total Tenant Services	\$ 2,001,462
93000 (93100+93600+93200+93300+93400+93800)	Total Utilities	\$ 16,019,942
93500+93700	Labor	\$ 0
94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	\$ 32,145,440
95000 (95100+95200+95300+95500)	Total Protective Services	\$ 513,361
96100 (96110+96120+96130+96140)	Total Insurance Premiums	\$ 3,117,227
96000 (96200+96210+96300+96400+96500+96600+96800)	Total Other General Expenses	\$ 12,061,523
96700 (96710+96720+96730)	Total Interest Expense and Amortization Cost	\$ 2,013,970
97100+97200	Total Extraordinary Maintenance	\$ 800,000
97300+97350	Housing Assistance Payments + HAP Portability-In	\$ 222,642,689

FDS Line Item Number	FDS Line Item Name	Dollar Amount
97400	Depreciation Expense	\$19,998,092
97500+97600+97700+97800	All Other Expenses	\$400,000
	Total Expenses	\$351,350,218

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

Total Expenses	\$351,350,218
Less: Depreciation Expense	\$(19,998,092)
Capital Hard Cost	\$19,464,019
MTW Uses of Funds	\$350,816,145

Uses of Fund exceed Sources of Fund by \$74,353 which will be funded by reserves.

#### Notes to Expense:

1. Administrative expenses include salaries and benefits for administrative staff, salaries and benefits for Housing Management staff at the Asset Management Project (AMP) levels as well as program staffs for the Section 8 HCV program. In addition, this category also includes operating expenses such as office rent, telephone, computer materials and contracts, postage and supplies for all programs.
2. Management Fees expense includes fees for HABC's Privately Managed Sites by outside management firms and fees to BRHP for the Mobility counseling program.
3. Allocated Overhead is calculated based on HUD's approved Local Asset Management Program since FY 2010. The proposed updated cost allocation calculations for CY 2021 are included in Appendix C.
4. Tenant Services includes salaries, benefits, materials and supplies used to support tenant councils and the Resident Advisory Board, and to provide direct services to residents of public housing.
5. Utilities include expenses for water, electricity, gas, steam and fuel consumed by HABC's AMPs. HABC continues to exercise prudent procurement actions to achieve favorable utility rates. Utility consumptions are adjusted based on addition or demolition activities planned for the fiscal year.
6. Ordinary Maintenance includes salaries and benefits of maintenance workers assigned to public housing units. It also includes maintenance materials and maintenance contracts used for ordinary maintenance operations. This category also includes outside contract costs to privatized firms, which manage some of HABC's public housing and affordable housing units and use of MTW/HAP funds for vacancy renovations.

7. Protective Services includes outside security contracts for the developments.
8. Insurance Premiums are budgeted for properties, general liability, worker's compensation, automobiles, commercial crime, EDP data and media, boiler and machinery for the MTW activities.
9. Other General Expenses include compensated absences, collection losses for uncollected rent and Payment in Lieu of Taxes (PILOT).
10. Interest Expense is budgeted for interest associated with the EPC Debt Service.
11. Extraordinary Maintenance is planned for unforeseen break down of heating systems, boilers, chillers, etc. This line also includes Casualty Loss which are estimated for unforeseen repairs and losses at public housing units that are not covered by insurance carriers.
12. Housing Assistance Payments (HAPs) include rent subsidies paid to landlords and utility assistance paid to tenants under the Section 8 HCV program. Section 8 HCV HAP expenditures are budgeted in the amount of \$222,642,689 (\$148,838,406 for Regular HABC Vouchers-including Port ins, \$73,804,283 for BRHP). The Plaintiffs of the Thompson Consent Decree have created a non-profit corporation, Baltimore Regional Housing Partnership (BRHP) to serve as Administrator beginning January 2013 and therefore, the HAP amount for Thompson consent decree and remedial vouchers in CY 2021 is reported as a pass-through from HABC to BRHP.
13. Depreciation Expense is estimated for the costs of tangible fixed assets allocated over their useful lives. Depreciation expense is based on HABC's fixed asset records and depreciation methods.

### iii. Description of Planned Use of MTW Single Fund Flexibility

The MTW Agreement allows HABC to combine public housing operating and capital funds (including development and replacement housing factor) 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 funding source. HABC uses this combined funding source to carry out MTW program activities in support of MTW statutory objectives to achieve greater costs effectiveness and to increase housing choices for low-income families.

The following activities will take place in FY 2021 using single fund flexibility:

- Due to inadequate funding for capital activities, HABC plans to use the unutilized prior year's HCV HAP Fund to supplement various capital improvements as detailed in the FY 2021 Capital Spending Plan using the single fund flexibility provisions.
- HABC will use these same MTW Fund for renovation and rehabilitation of vacant units using the single fund flexibility provisions.

## B. Local Asset Management Plan (LAMP)

i. *Is the MTW PHA allocating costs within statute?*

No

ii. *Is the MTW PHA implementing a local asset management plan (LAMP)?*

Yes

iii. *Has the MTW PHA provided a LAMP in the appendix?*

Yes

## C. Rental Assistance Demonstration (RAD) Participation

### i. *Description of RAD Participation*

Table 13 includes RAD conversions which have closed or are projected to close by the end of the current fiscal year. Table 14 includes RAD conversions which are slated for conversion after FY 2020. 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 2020 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 13 and 14.

**Table 13: RAD Conversions Closed or Projected to Close by the End of FY 2020**

Property Name	No. of Units Converted to PBRA	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
BE Mason	223	PBRA	11/15	Under review for HUD certification of completion	5/12/15	10/27/15
Bel Park Tower	253	PBRA	11/15	HUD approved the RAD Completion Certification.	5/12/15	10/27/15
Brentwood	150	PBRA	12/15	Under review for HUD certification of completion	5/12/15	10/27/15
Broadway Overlook	84	PBRA	8/17	HUD approved the RAD Completion Certification.	10/26/16	01/26/17



Property Name	No. of Units Converted to PBRA	RAD Conversion Type	Dated Closed or Projected to Close	Major Milestone/Status	RAD Significant Amendment Submission Date*	RAD Significant Amendment Approval Date
Chase House	189	PBRA	12/16	Submitted to HUD for certification of Completion	5/12/15	10/27/15
Ellerslie	117	PBRA	2/17	Under review for HUD certification of completion	10/26/16	01/26/17
Govans Manor	191	PBRA	11/16	Under review for HUD certification of completion	10/26/16	01/26/17
Hillside Park	30	PBRA	12/17	HUD approved the RAD Completion Certification.	12/1/17	6/29/18
Hollins House	130	PBRA	11/15	Under review for HUD certification of completion	5/12/15	10/27/15
Lakeview Tower	302	PBRA	11/15	HUD approved the RAD Completion Certification.	5/12/15	10/27/15
McCulloh Extension	347**	PBRA	11/16	Under review for HUD certification of completion	5/12/15	10/27/15
Primrose Place	125	PBRA	2/16	Under review for HUD certification of completion	5/12/15	10/27/15
Pleasant View Gardens Senior	110	PBRA	7/16	Submitted to HUD for certification of Completion	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
Senior Townes at the Terraces	47	PBRA	11/17	HUD approved the RAD Completion Certification.	10/26/16	01/26/17
Wyman House	168	PBRA	12/15	HUD approved the RAD Completion Certification.	5/12/15	10/27/15
Heritage Crossing	75	PBRA	11/18	HUD approved the RAD Completion Certification.	12/1/17	6/29/18
J. Van Story Branch Apts	350***	PBRA	11/18	Projected completion of construction November 2020	12/1/17	6/29/18

Property Name	No. of Units Converted to PBRA	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	Completed February 2020.	12/1/17	6/29/18
Rosemont Tower	203	PBRA	9/19	Projected completion of rehab: February 2021.	12/1/17	6/29/18
Scattered Sites (Thompson 58/Broadway Homes)	58	PBRA	5/19	Projected completion of rehab: November 2020	04/12/17	12/27/17
Somerset Court Extension	58	PBRA	9/19	Projected completion of rehab: February 2021	12/1/17	6/29/18
<b>Total</b>	<b>3,745</b>					

*\*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*

HABC anticipates closing on Somerset Homes Phase 2 RAD conversions in FY 2020. The table below identifies projects that are anticipated to be converted under RAD in FY 2021. Future RAD Significant Amendments will be prepared and submitted per HUD required timelines.

**Table 14: RAD Conversions Projected to Close in FY 2021 and Future Years**

Property Name	RAD Units	RAD Conversion Type	CHAP Received (Yes/No)	Major Milestones
Carey House	23	PBRA	Yes	Developer selected. RAD conversion will not take place in 2021.
Laurens House	36	PBRA	Yes	Developer selected. RAD conversion will not take place in 2021.
Dukeland	27	PBRA	Yes	Developer selected. RAD conversion will not take place in 2021.

Property Name	RAD Units	RAD Conversion Type	CHAP Received (Yes/No)	Major Milestones
The Rosemont Low Rise	106	PBV	Yes	Developer selected. RAD conversion may take place in 2021.
Oswego Mall	35	PBRA	Yes	Developer selected. RAD conversion may take place in 2021.
Shipley Hills	21	PBRA	Yes	Developer selected. RAD conversion will not take place in 2021.
Hollander Ridge	94	PBRA	Yes	The acquisition of 94 units was completed in June 2019; Closed on project financing April 2020. Full conversion RAD will not take place until the end of 2021.
Perkins RAD/CNI	629	75% RAD PBV; 25% PBV	Yes	CHAP awards received for all of Perkins and Somerset. The following phases: Perkins Phase I is 48 units; Perkins Phase 2 for 76 units; Phase 3 for 71 units; Phase 4 – 70 units; Phase 5 is 112 units. ) Somerset 3 is 36 units; Somerset Phase 4 is 89 units.. Somerset 2 & 3 are RAD conversions planned to close in 2020. Perkins Phase I RAD conversion planned to close in 2021. Perkins first phased demo to begin January 2020 with projected financial closing in March 2021; Perkins Phase 2 submitted 9%/4% Twinning Application on 9/9/20.
Somerset Homes/CNI	100	75% RAD PBV; 25% PBV		Somerset Phase 2 CHAP award received for 520 Somerset (9%) – 44 units; 525 Aisquith (4%) for 56 units.
Poe Homes	288	75% RAD PBV; 25% PBV	Yes	Developer selected & MDA under negotiation; Choice Neighborhood Transformation Plan submitted to HUD on 9/3/20; HABC awaiting HUD acceptance of housing plan. HABC may submit a dispo application and a Choice Neighborhood Implementation

Property Name	RAD Units	RAD Conversion Type	CHAP Received (Yes/No)	Major Milestones
				Grant application in 2021 and/or subsequent years.
McCulloh Homes	556	PBV	Yes	The overall concept plan for the site has been developed. RAD conversions will not take place in 2020 and will not occur until after the State Center plan is approved.
Arbor Oaks	62	PBV	Yes	HABC acquired limited partnership & managing general partnership interests in July 2020 & projects RAD Financing Plan will be submitted by 3/31/2021. RAD conversion may take place in late 2021. RAD Significant amendment submitted on 12/1/17 and approved on 6/29/18
Townes at the Terraces	203	PBRA	Yes	HABC acquired limited partnership & managing general partnership interests in July 2020 & projects RAD Financing Plan will be submitted by 3/31/21. RAD conversion may take place in 2021. RAD Significant Amendment submitted on 12/1/17 and approved on 6/29/18.
<b>TOTAL</b>	<b>2,180</b>			

- 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.*

The prior RAD Significant Amendment found in the HUD-approved FY 2020 Annual Plan as Appendix G describes the conversion type as RAD PBV for Poe Homes. Table 14 above amends the conversion type to a 75/25 Blend where 25% of the CNI replacement units will be subsidized with project-based vouchers and 75% of the CNI replacement units will be converted under RAD PBV. Financing includes multifamily housing bonds and 4% Low Income Tax Credits.

The prior RAD Significant Amendment found in the HUD-approved FY 2019 Annual Plan as Appendix P describes the RAD conversion type as PBRA for the 62 units at Arbor Oaks. Table 14 amends the conversion type to PBV.

## **VI. Administrative**

### **A. Board Resolution and Certification of Compliance**

A Resolution approving the FY 2021 MTW Annual Plan and the MTW Plan Certifications of Compliance (Appendix B) will be attached once the Annual Plan has been adopted by the HABC Board of Commissioners at the December 20, 2020 meeting, following the public review process and public hearing. The Resolution will be included in Appendix A.

### **B. Documentation of Public Process**

HABC provided public notice of the FY 2021 MTW Annual Plan and posted the Plan on its website. HABC also made copies of the FY 2021 Amended Annual Plan available at HABC's main offices. A 30-day public comment period to allow for resident and general public review was provided from October 30, 2020 through November 30, 2020. A public hearing will be held and recorded via WebEx video conference on November 24, 2020. Prior to finalizing the Plan, HABC will consider all comments received during the public review process. Documentation of the public process and comments received will be included as Appendix B.

### **C. Indirect Cost Rate and Local Asset Management Plan**

HABC will continue to monitor and evaluate MTW activities during FY 2021. 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 has included the Lobbying Activities (SF- LLL) and Certification of Payments (HUD-50071) forms. See Appendix E and Appendix F.

### **E. Certification of Payments**

HABC does not have any lobbying activities to disclose. HABC has included the Lobbying Activities (SF- LLL) and Certification of Payments (HUD-50071) forms. See Appendix E and Appendix F.

### **F. Planned and Ongoing Evaluations**

HABC will continue to monitor and evaluate MTW activities during FY 2021. 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.

## Appendix A: Board Resolution

TO BE INSERTED UPON BOARD APPROVAL



## Appendix B: Public Process

TO BE INSERTED UPON BOARD APPROVAL

## Appendix C: Local Asset Management Plan

### HABC CY21 Indirect Cost Rate Explanation,

#### A component of HABC's Local Asset management Plan

This cost allocation plan and process for Calendar Year 2021 represents year nine 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 2020 Approved Consolidated Budget. Based on this budget and the attached schedule, **the indirect cost rate for CY2021 will be 14.52% for MTW and 7.81% for non-MTW (see Attachment A for detail).**

## Appendix C: Local Asset Management Plan (cont'd.)

[illegible]

## Appendix D: Lobbying Activities (SF-LLL) Form

## Appendix E: Certification of Payments (HUD-50071) Form

TO BE INSERTED