

FY 2026

Moving to Work





Moving to Work Annual Plan

Fiscal Year 2026

Draft

Approved by HABC Board of Commissioners:

Submission to HUD:

Housing Authority of Baltimore City
Moving to Work Annual Plan – Fiscal Year 2026

Table of Contents

I.	Introduction and Overview	1
	A. Background on the MTW Demonstration	1
	B. MTW Long-Term Goals and Objectives.....	2
	C. MTW Goals and Objectives for Fiscal Year 2026	3
II.	General Housing Authority Operating Information.....	9
	A. Housing Stock Information.....	9
	i. Planned New Public Housing Units.....	9
	ii. Planned Public Housing Units to Be Removed	9
	iii. Planned New Project-Based Vouchers.....	24
	iv. Existing Project-Based Vouchers	25
	v. Planned Other Changes to MTW Housing Stock Anticipated During the Plan Year	36
	vi. General Description of All Planned Capital Expenditures During the Plan Year	36
	B. Leasing Information	38
	i. Planned Number of Households Served	38
	ii. Discussion of Any Anticipated Issues/Possible Solutions Related to Leasing	39
	C. Waiting List Information	39
	i. Waiting List Information Anticipated.....	39
	ii. Planned Changes to the Waiting List in the Plan Year	40
III.	Proposed MTW Activities.....	41
	Activity #2026-01: Support for Statewide Rental Assistance Voucher Program	41
IV.	Approved MTW Activities	43
	A. Implemented Activities	43
	Activity #2006-01: Streamlined Admission & Recertification Process.....	43
	Activity #2006-02 Enhanced Project Based Voucher Program.....	47
	Activity #2006-03: Thompson Streamlined Admission & Recertification Process	50
	Activity #2006-04: Family Self-Sufficiency Program Enhancements	51
	Activity #2007-01: Mobility Program Enhancements/Thompson	54
	Activity #2009-01: MTW Homeownership Program.....	56

Activity #2010-01: Unit Sizes	62
Activity #2010-02: Bailey Long–Term Affordable Project-Based Voucher Contract	63
Activity #2012-01: Rent Simplification – Thompson.....	64
Activity #2014-01: HABC Long–Term Affordable Project-Based Voucher Contract	67
Activity #2019-01: Rent Simplification.....	68
Activity #2019-02: Local Fair Market Rent	71
Activity #2020-01: Housing Quality Standards Modifications & Enhancements	72
Activity #2020-04: Modified Rent Reasonableness & Rent Cap Policy.....	74
Activity #2020-05: The Bailey 10 Total Development Cost Limit Policy	76
Activity #2021-01: Emergency Waivers	77
Activity #2021-03: Growing Assets & Income Program: Thompson Settlement Agreement	79
Activity #2022-01: Student Housing Initiative.....	81
Activity #2022-02: Leasing Incentive Program	84
Activity #2024-01: Get Ready for Opportunities to Work.....	87
Activity #2024-02: Program Efficiencies	90
Activity #2025-01: Affordable Housing Preservation Fund.....	91
B. Not Yet Implemented Activities.....	94
C. MTW Activities on Hold.....	94
Activity #2020-02: The Healthy Opportunities Program.....	94
D. Closed-Out MTW Activities	95
V. Planned Application of MTW Funds	105
A. Planned Application of MTW Funds in FY 2026.....	105
i. Estimated Sources of MTW Funds.....	105
ii. Estimated Application of MTW Funds	106
iii. Description of Planned Application of MTW Funding Flexibility.....	108
iv. Planned Application of PHA Unspent Operating Fund and HCV Funding.....	108
v. Local Asset Management Plan (LAMP)	109
vi. Rental Assistance Demonstration (RAD) Participation	109
VI. Administrative	115
A. Board Resolution and Certification of Compliance.....	115
B. Documentation of Public Process	115
C. Planned & Ongoing Evaluations	115
D. Lobbying Disclosures.....	115

Appendix A: Estimated Sources and Uses: Non-MTW Funds	116
Appendix B: Local Asset Management Plan.....	119
Appendix B: Local Asset Management Plan (Attachment A)	121
Appendix C: Asset Management Table	124
Appendix D: Board Resolution	129
Appendix E: Certification of Compliance	130
Appendix F: Certification of Consistency with Consolidated Plan	131
Appendix G: Public Process Documentation.....	132
Appendix H: Comments Received on the FY 2025 Plan	133
Appendix I: Attendee Sign-In Sheets	134
Appendix J: Lobbying Activities (SF-LLL) Form	135
Appendix K: Certification of Payment (HUD-50071) Form	136
Appendix L: RAD Significant Amendments	137

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) 2026, i.e., the period from January 1, 2026, through December 31, 2026.

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 2026. 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 who 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 2026 are all designed to promote one or more of the MTW statutory objectives.

In order to provide the public and HUD with a more detailed view of HABC's overall plans and strategies, the Annual Plan includes discussions of both MTW activities and other activities which do not specifically require MTW authority to implement.

B. MTW Long-Term Goals and Objectives

Since 2019, HABC has been diligently working to carry out the priorities highlighted in our Strategic Plan called *Pathways to Success*. We created an online, interactive dashboard to track and share our progress in implementing the goals, strategies and objectives presented in the plan. We found that at the halfway mark of this 10-year roadmap, HABC had already achieved many of the goals outlined in the document. Therefore, in 2024, HABC launched an initiative to update *Pathways to Success*, which included stakeholder surveys and interviews as well as a two-day leadership retreat with HABC staff and members of our Board of Commissioners. This provided an opportunity for the agency and our stakeholders to reflect on our accomplishments to date, revisit the goals set forth in the plan and introduce new objectives and strategies. The result was an updated Strategic Plan that was completed in January 2025 and is centered around HABC's four main priorities which are: **Sustain, Advocate, Innovate and Transform**. In 2026, HABC's focus will be on starting the implementation of the updated *Pathways to Success* as described below.

Sustain

HABC will sustain a level of excellence by:

- Recruiting and maintaining high quality staff; continuing to strengthen our current departmental teams; and maintaining a robust staff recruitment program
- Maintaining and improving upon high-performer status; continuing to meet FASS, MASS, PASS and SEMAP indicators
- Continuing with our quality control program

Advocate

HABC will advocate for affordable housing and resident services by:

- Advocating for improved safety in HABC communities
- Advocating for increased law enforcement presences and funding at all HABC sites
- Developing a comprehensive safety plan to mitigate crime and safety challenges which causes loss of revenue from prolonged vacancies and creates a reluctance in residents, staff and contractors to live or work at challenging sites

Innovate

HABC will innovate the way it operates by:

- Increasing and strengthening resident leadership and participation
- Improving outreach to residents and increasing awareness of available resources
- Improving HABC's staff capacity for direct resident engagement; and improving ongoing communication with residents

Transform

HABC will transform the way it does business by:

- Strengthening HABC's role in the community and improving the way the agency is perceived, identifying current perceptions as well as opportunities and challenges
- Refining and enhancing communications plans, methodology and outreach for internal and external audiences
- Developing and refining awareness campaigns to educate targeted audiences regarding HABC initiatives, progress, partnerships and opportunities.

In addition to these goals, HABC will continue to expand upon the housing opportunities provided by the Housing Choice Voucher Program (HCVP), increase our utilization and build upon our landlord incentives. We will also develop strategies to reposition HABC's current housing inventory and ensure that HABC and/or HABC's development arm, Baltimore Affordable Housing Development (BAHD), retains maximum ownership and leverage in all future development transactions. In addition, HABC will continue to utilize its MTW authority to research, develop and implement activities that use locally determined solutions to provide affordable housing as well as supportive services.

C. MTW Goals and Objectives for Fiscal Year 2026

In support of HABC's Strategic Plan, the summary below provides highlights of HABC's MTW and Non-MTW activities and goals and objectives for FY 2026.

Housing Opportunities through Modernization Act (HOTMA)

The Final Rule implementing certain sections of the Housing Opportunity Through Modernization Act of 2016 (HOTMA) was published on February 14, 2023; however, HUD's required implementation dates for HOTMA provisions have been staggered and some are still pending.

HABC has updated the HCV Administrative Plan and Public Housing ACOP to comply with provisions listed in HOTMA 102/104 with an implementation date of 3/3/2025 referencing income exclusions (including new requirements for student financial assistance), and income definitions. HABC also stopped providing the Earned Income Disregard credit as of 12/31/2025 and implemented the HUD 9886-A form on 1/1/2024.

HABC has also implemented several changes to its income calculation and review process, which, prior to HOTMA, were allowed as discretionary policies and which, subsequent to HOTMA, require MTW waiver to continue to implement. The remaining required HOTMA provisions, which have not been waived under MTW, are planned for implementation upon HUD notification.

Thompson Settlement Agreement Extension, Amendment & Voucher Administration

Pursuant to the Settlement Agreement entered in *Thompson, et al. v HUD, et al*, The Baltimore Regional Housing Partnership (BRHP) entered into a Services Agreement with HABC in December 2012 to administer regionally, the Thompson Remedial Vouchers, Thompson PCV-Leased Vouchers and Thompson PCD Homeownership Units. In February 2024, HABC and BRHP signed the First Amendment to that

Agreement. The amendment extends the term of the Contract and makes certain changes in the allocation of responsibilities of the parties under the Contract. Specifically, the amendment allows BRHP to administer services for all HABC vouchers who are exercising portability within the BRHP services area. Administration of the HABC Portability Households will be in accordance with BRHP's Administrative Plan. Under the amendment BRHP successfully transferred administration of 25 Thompson PCD Homeownership Unit to HABC for administration in accordance with the HABC Administrative Plan. Additionally, BRHP transitioned to HABC approximately 375 BRHP leased families who moved to Baltimore City, outside of Opportunity Neighborhoods and remained for at least two years. As a result of the transition of the vouchers, BRHP was able to issue 375 vouchers to families from its waiting list who wish to lease units in Opportunity Neighborhoods.

New Activities

Support for Statewide Rental Assistance Voucher Program

This activity establishes a framework for HABC to support the state-funded SVP using MTW resources, if needed. The SVP will provide temporary rental assistance to low-income families on the HCV waiting list. While the program will primarily be administered using funding from the state of Maryland, this activity gives HABC the authority to allocate MTW funds for supplemental rental assistance, administrative support, or housing services. Planning and coordination will occur in FY 2026 to determine if and how MTW resources may be used.

Changes to Existing Activities

In an effort to enhance its commitment to meeting statutory MTW objectives, HABC is proposing changes to some of its existing, approved MTW activities in 2026. Detailed information on the changes can be found in each specific activity section of the Plan.

Public Housing

- **Occupancy:** HABC projects that 5,206 households will be served in FY 2026, which reflects planned utilization, as well as Public Housing conversions under RAD.
- **Capital Program:** HABC will implement capital improvements at existing public housing developments and scattered sites using MTW Block Grant funds (see Table 5). In FY 2026, HABC projects that it will expend approximately \$18 million on capital projects.

Housing Choice Voucher Program

- **Voucher Utilization:** HABC projects that, on average, it will have 21,114 MTW units under lease each month, including Thompson vouchers and Local Non-Traditional households.
- **Project-Based Voucher Utilization:** HABC projects that 3,896 housing units will be under contract in the Project-Based Voucher (PBV) program by 12/31/2025. In addition, HABC projects that 308 new PBVs will be placed under contract during FY 2026.

Homelessness Prevention Initiatives

HABC provides up to 900 Housing Choice Vouchers to eligible chronically homeless households referred by the Mayor's Office of Homeless Services (MOHS). Participants use their vouchers to find affordable permanent housing while receiving supportive services through MOHS and partner agencies. Of the 900 limited preference vouchers, 230 have been designated for project-based units for homeless individuals, 50 are for homeless families with children under age 18 and 620 tenant-based vouchers are for homeless individuals and families. To date, 823 vouchers have been issued and of those 823, 27 are in the housing search process. In FY 2026 HABC anticipates full utilization of all 900 limited preference vouchers.

- **The Project-Based Homeless and Veterans Set Asides:** In FY 2026, HABC anticipates that there will be 56 project-based units at Beacon house which are designated for homeless veterans.
- **The Re-Entry Program:** This program links permanent housing with supportive services to assist up to 250 ex-offender households. Referrals are made to HABC by MOHS. MTW Authority is not required for this initiative. In FY 2026 HABC anticipates that all 250 vouchers will be leased. Vouchers are generally issued upon receipt of applicable referrals. To date, 204 vouchers have been leased and 22 vouchers have been issued to families searching for units. Close coordination between MOHS and HABC is key to voucher turnover and releasing.

Office of Resident Services

- **MTW Homeownership Programs:** The MTW Homeownership Program works with public housing residents, HCV participants and other eligible low-income households in preparation for first-time homeownership. As part of this program, HABC utilizes MTW flexibility to create and fund a limited number of Special Homeownership Vouchers (SHV) for use by eligible low-income households who purchase a scattered site unit. HABC anticipates that 18 additional families will have purchased homeownership units under the MTW Homeownership program.
- **Resident Service Programs:** In FY 2025, HABC plans to serve its public housing and HCVP residents through a wide array of self-sufficiency, personal development and supportive service program offerings, including adult education classes, support services for our senior population, educational and mentoring support for our youth and career development and workplace readiness training.

Rental Assistance Demonstration Program (RAD)

Under RAD, public housing developments can be converted to Project Based Rental Assistance (PBRA) or to Project Based Voucher (PBV) assistance. Developments converted under RAD to either PBRA or PBV have a new ownership structure including a new management and maintenance team. HABC anticipates that it will have closed on 33 RAD developments, consisting of 4,180 units by the end of FY 2025, with additional developments slated to convert in FY 2026 and beyond. See Tables 15 and 16 for specific information on RAD conversions.

Development Initiatives

HABC utilizes MTW Block Grant and other public and private leveraged funds to support the preservation and revitalization of existing public housing communities and the development of new affordable units. A summary of non-RAD activities and other major ongoing and planned development initiatives follows. The discussion of planned unit counts, timetables, development financing and other details is preliminary and is 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 2026.

- **O'Donnell Heights:** The Neighborhood Revitalization Plan for the O'Donnell Heights community was approved by the Baltimore City Planning Commission. In March 2023, a LIHTC application was submitted for Key's Pointe Phase 2A and in the 4th quarter of 2024, the developer submitted their commitment package to the State/CDA. Projected financial closing is scheduled for June 2025. Construction at Key's Pointe Phase 2A is slated to begin on or before the third quarter of 2025. The City's Department of Recreation and Parks received a \$500,000 planning grant to assist them with the design portion of their 5-acre park which will commence in 2025. In addition, the Developer submitted a 9% LIHTC application to CDA for Key's Pointe Phase 2B on May 16, 2025.
- **Perkins Somerset Oldtown (PSO) Transformation Plan:** On July 18, 2024, HUD approved HABC's latest revision to the PSO Housing Plan. All total, the Plan includes 1,353 rental housing units. While Somerset Phase 1 was completed in 2021 and reached stabilized occupancy, changes were proposed for the remaining Perkins Phases. Somerset Phase 2 was completed in December 2023 and reached stabilized occupancy in 2024. Construction for Somerset Phase 3 was completed in September of 2023 and reached stabilized occupancy in 2024. Somerset Phase 4 (awarded 9% LIHTCs) is expected to close and be under construction in 2025 with completion slated for 2027.
- Perkins Phase 1 was completed in June 2024 and reached stabilization in 2025. Perkins Phase 2 was awarded a 9% LIHTC, closed in December 2022, started construction in 2023 and completed construction in 2025. Perkins Phase 3 closed in 2023, started construction in 2024 and is projected to complete construction in 2025. Start dates for Perkins Phases 4 and 5 changed from 2023 to 2025 and completion dates are now anticipated in 2027. Perkins Phase 4 is projected to close in June 2025. Perkins Phase 5A-C are projected to close Q1 2026. A new phase, Perkins 5C, was added to reflect work at 1500 Bank Street located in the southern portion of Parcel D with respective start and completion dates in 2026 and 2027.
- **Poe Homes:** HABC has been working in collaboration with Baltimore City on acquiring additional properties. In 2023, 811 W. Saratoga St. and 317 N. Schroeder St. were acquired by HABC. We are working with City on 319-323 N. Schroeder as they are in condemnation. In addition, HABC and the City are working to remove the ground rent acquisitions by condemnation for 319, 321 and 323 N. Schroeder Streets. All of these potential strategic acquisitions will assist HABC in completing larger site assembly as it related to the larger overall future redevelopment of Poe Homes and will further strengthen a potential future Choice Neighborhoods implementation application for the Transform Poe Plan. The tenant relocation process for Poe Homes residents

commenced in 2023 following HUD’s approval of the demolition application by letter dated July 7, 2023, with the last remaining household relocated in April 2025. Projected demolition is scheduled to begin 2025.

- **Affordable Housing Preservation Activity:** HABC will continue to utilize MTW Block Grant funds to support the preservation of affordable rental housing units through implementation of the Affordable Housing Preservation Fund (AHP) activity. AHP funds will support revitalization of rental units that are not public housing or Housing Choice Voucher units and which are targeted for households earning 80% and below of Area Median Income. AHP funds will be used for repairs and improvements to ensure that all units meet housing quality standards. Three hundred and fifteen units are slated for revitalization under this activity in FY 2026.

Thompson Settlement Agreement

Pursuant to the Thompson Settlement Agreement, the Baltimore Regional Housing Partnership (BRHP) plans to continue 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, available to pre-qualified developers and property owners who develop housing units and agree to enter into long term project-based voucher contracts.

From program inception through year-end FY 2025, a total of 127 units will have been created or placed under AHAP which includes 10 units at Red Maple Place that will be created in FY 2025.

Bailey Consent Decree

The Bailey Consent decree required the creation of:

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

Using MTW flexibility, HABC will create additional LTA NED units and LTA UFAS units to complete its obligations under Bailey. To date, HABC has created more than 756 UFAS units throughout its public housing and through participation in the Rental Assistance Demonstration Program.

- **Bailey Supplemental Decree Units:** Through 2025, HABC acquired seven of the ten Bailey units. Our sixth property, 509 Archer Street, was acquired in April 2025, and the seventh is 1703 Swansea and was acquired on in July 2025. Both will be completed and occupied on or before the end of 2025. The previously acquired five units are completed and occupied.
- **UFAS Units:** As of August 2025, 257 units that meet the UFAS requirements for wheelchair accessibility were available through HABC’s Public Housing program. HABC continued to:

- (i) maintain existing UFAS units, to the extent that they remained viable, 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.

In 2024, 32 UFAS units were created at the Ella, 12 UFAS units were created at Perkins Phase 1, and 6 at Rosement Low Rise.

II. General Housing Authority Operating Information

A. Housing Stock Information

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

i. Planned New Public Housing Units

Table 1: Planned New Public Housing Units in FY 2026

There are no new public housing units planned for FY 2026.

Asset Management Project(AMP) Name and Number	0 Bdm	1 Bdm	2 Bdm	3 Bdm	4 Bdm	5+ Bdm	Total Units	Population Type**	Section 504 Accessible Units* (Mobility)	Section 504 Units* (Hearing/Vision)
							0		0	0
							0		0	0
Total Public Housing Units to be Added in the Plan Year							0			

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

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

If "Population Type is "Other" please describe:

Not Applicable

ii. Planned Public Housing Units to Be Removed

As shown on Table 2, HABC plans to demolish and/or dispose of up to 809 units/vacant lots in FY 2026. This count includes 793 housing units and 16 vacant lots. While Table 2 provides an estimate of the number of units to be removed from the public housing inventory during the Plan Year, the actual number may vary depending on the timetables for HUD and City of Baltimore approvals, project financing, RAD closings and other factors. Due to various factors that impact the timetable, the listed items may have been included in previous and may be included in future plans.

Table 2: Planned Public Housing to Be Removed in FY 2026

PIC Dev.#/AMP & PIC Dev. Name	Number of Units to be Removed	Explanation for Removal
O'Donnell Heights MD002/0000008 6301 O'Donnell St.	1 Vacant Lot	The 62-acre O'Donnell Heights Public Housing site is being redeveloped in 4 main phases. This parcel represents the 2 nd phase of the redevelopment and covers 27 cleared-acres. Phase 2 is expected to be developed in 4 residential sub-phases and include a new central park. A disposition for the first subphase, identified as Phase 2A and totaling 4.54 acres was approved by HUD December 4, 2024, and includes the construction of 60 affordable rental units. HABC will work with the developer to complete disposition applications for the remaining 3 residential sub-phases and the new central park in 2026.
O'Donnell Heights MD002/0000009 6201 O'Donnell St. 6291 Boston St.	230	HABC submitted a demolition application to HUD in July 2024 for the remaining units at O'Donnell Heights, which are physically obsolete and too costly to renovate due to aging systems and costly maintenance. A mixed-income development will be constructed. HUD Demolition Application is under review. Waiting for HUD approval.
Poe Homes MD002/0000004	288	HABC received HUD approval to demolish Poe Homes. All 288 units will be demolished in 2026.
Reservoir Hill 2 MD002/000118	40	Planned RAD conversion.
Sharp Leadenhall MD002/000119	23	Planned disposition and RAD conversion with a Section 18 blend.
Dukeland (Scattered Site) MD002/000031B 1700 Gertrude Ct.	30	Planned RAD Conversion
Midtown Apartments MD002/000103 922 N. Calhoun St. A	1	Unit is not viable due to neighborhood conditions and would not provide safe housing for an HABC tenant.
Midtown Apartments MD002/000103 922 N. Calhoun St. B	1	Unit is not viable due to neighborhood conditions and would not provide safe housing for an HABC tenant.
Midtown Apartments MD002/000103 1213 Mosher St. A	1	Unit is not viable due to neighborhood conditions and would not provide safe housing for an HABC tenant.
Midtown Apartments MD002/000103 1213 Mosher St. B	1	Unit is not viable due to neighborhood conditions and would not provide safe housing for an HABC tenant.
Midtown Apartments MD002/000103	1	This unit has been deemed not viable due to an abundance of vacant properties on this block.

PIC Dev.#/AMP & PIC Dev. Name	Number of Units to be Removed	Explanation for Removal
1319 Mosher St.		
Midtown Apartments MD002/000103 1605 Riggs Ave.	1	HABC has determined property is non-viable and will dispose of it in accordance with scattered site strategy.
Midtown Apartments MD002/000103 1623 Mosher St. A	1	HABC has determined property is non-viable and will dispose of it in accordance with scattered site strategy.
Midtown Apartments MD002/000103 1623 Mosher St. B	1	HABC has determined property is non-viable and will dispose of it in accordance with scattered site strategy.
Midtown Apartments MD002/000103 1627 Mosher St. B	1	HABC has determined property is non-viable and will dispose of it in accordance with scattered site strategy.
Midtown Apartments MD002/000103 1627 Mosher St. B	1	HABC has determined property is non-viable and will dispose of it in accordance with scattered site strategy.
Scattered Sites 201 MD002/000201 324 E. 20 ½ St.	1 Vacant Lot	HABC has determined property is non-viable and will dispose of it in accordance with scattered site strategy.
Scattered Sites 202 MD002/000202 1213 N. Eden St.	1	HABC has determined property is non-viable and will dispose of it in accordance with scattered site strategy.
Scattered Sites 203 MD002/000203 4204 Park Heights Ave.	1	This unit has been deemed not viable due to an abundance of vacant properties on this block.
Scattered Sites 203 MD002/000203 4206 Park Heights Ave.	1	This unit has been deemed not viable due to an abundance of vacant properties on this block.
Stricker Steet Apartments MD002/000109 1306 N. Carey St.	1	Unit is not viable due to neighborhood conditions and would not provide safe housing for an HABC tenant
Uptown Apartments MD002/000108 913 N. Calhoun St. A	1	HABC has determined property is non-viable and will dispose of it in accordance with scattered site strategy.
Uptown Apartments MD002/000108 913 N. Calhoun St. B	1	HABC has determined property is non-viable and will dispose of it in accordance with scattered site strategy.
Uptown Apartments MD002/000108 915 N. Calhoun St. A	1	HABC has determined property is non-viable and will dispose of it in accordance with scattered site strategy.
Uptown Apartments MD002/000108 915 N. Calhoun St. B	1	HABC has determined property is non-viable and will dispose of it in accordance with scattered site strategy.

PIC Dev.#/AMP & PIC Dev. Name	Number of Units to be Removed	Explanation for Removal
Uptown Apartments MD002/000108 917 N. Calhoun St. A	1	HABC has determined property is non-viable and will dispose of it in accordance with the scattered site strategy.
Uptown Apartments MD002/000108 917 N. Calhoun St. B	1	HABC has determined property is non-viable and will dispose of it in accordance with scattered site strategy.
Uptown Apartments MD002/000108 920 N. Gilmore St. A	1	This unit has been deemed not viable due to an abundance of vacant properties on this block.
Uptown Apartments MD002/000108 920 N. Gilmore St. B	1	This unit has been deemed not viable due to an abundance of vacant properties on this block.
Uptown Apartments MD002/000108 921 N. Calhoun St.	1	The condition of the adjacent property poses a risk to the structural integrity of this unit.
Uptown Apartments MD002/000108 1011 N. Monroe St.	1	This unit has been deemed not viable due to an abundance of vacant properties on this block.
Uptown Apartments MD002/000108 1152 N. Stricker St.	1	Unit is not viable due to neighborhood conditions and would not provide safe housing for an HABC tenant.
Uptown Apartments MD002/000108 1344 N. Carey St.	1	Unit is not viable due to neighborhood conditions and would not provide safe housing for an HABC tenant.
Uptown Apartments MD002/000108 1415 Mosher St.	1	HABC has determined property is non-viable and will dispose of it in accordance with scattered site strategy.
Uptown Apartments MD002/000108 1449 N. Carey St.	1	HABC has determined property is non-viable and will dispose of it in accordance with scattered site strategy.
Uptown Apartments MD002/000108 1800 Presbury St.	1	This unit has been deemed not viable due to an abundance of vacant properties on this block.
Uptown Apartments MD002/000108 1808 Presbury St.	1	This unit has been deemed not viable due to an abundance of vacant properties on this block.
Scattered Sites 200 MD002/000200 1030 Valley St.	1	Unit to be transferred to the Scattered-Sites Homeownership Program and will be sold to the current occupant.
Scattered Sites 200 MD002/000200 411 North Ave.	1	Unit to be transferred to the Scattered-Sites Homeownership Program and will be sold to the current occupant.

PIC Dev.#/AMP & PIC Dev. Name	Number of Units to be Removed	Explanation for Removal
Scattered Sites 201 MD002/000201 724 McCabe Ave.	1	Unit to be transferred to the Scattered-Sites Homeownership Program and will be sold to the current occupant.
Scattered Sites 201 MD002/000201 509 E. 22 nd St.	1	Unit to be transferred to the Scattered-Sites Homeownership Program and will be sold to the current occupant.
Scattered Sites 201 MD002/000201 2012 E. 30 th St.	1	Unit to be transferred to the Scattered-Sites Homeownership Program and will be sold to the current occupant.
Scattered Sites 201 MD002/000201 320 E. 27 th St.	1	Unit to be transferred to the Scattered-Sites Homeownership Program and will be sold to the current occupant.
Scattered Sites 201 MD002/000201 318 E. 20 th St.	1 Vacant Lot	HABC plans to execute an exchange agreement with the City of Baltimore for this vacant lot to be included in a City-driven neighborhood revitalization project.
Scattered Sites 201 MD002/000201 320 E. 20 th St.	1 Vacant Lot	HABC plans to execute an exchange agreement with the City of Baltimore for this vacant lot to be included in a City-driven neighborhood revitalization project.
Scattered Sites 201 MD002/000201 324 E. 20 th St.	1 Vacant Lot	HABC plans to execute an exchange agreement with the City of Baltimore for this vacant lot to be included in a City-driven neighborhood revitalization project.
Scattered Sites 201 MD002/000201 336 E. 20 th St.	1 Vacant Lot	HABC plans to execute an exchange agreement with the City of Baltimore for this vacant lot to be included in a City-driven neighborhood revitalization project.
Scattered Sites 201 MD002/000201 324 E. 20 ½ St.	1 Vacant Lot	HABC plans to execute an exchange agreement with the City of Baltimore for this vacant lot to be included in a City-driven neighborhood revitalization project.
Scattered Sites 201 MD002/000201 2002 Barclay St.	1 Vacant Lot	HABC plans to execute an exchange agreement with the City of Baltimore for this vacant lot to be included in a City-driven neighborhood revitalization project.
Scattered Sites 201 MD002/000201 2006 Barclay St.	1 Vacant Lot	HABC plans to execute an exchange agreement with the City of Baltimore for this vacant lot to be included in a City-driven neighborhood revitalization project.
Scattered Sites 201 MD002/000201 2008 Barclay St.	1 Vacant Lot	HABC plans to execute an exchange agreement with the City of Baltimore for this vacant lot to be included in a City-driven neighborhood revitalization project.
Scattered Sites 201 MD002/000201 527 Beaumont Ave.	1	HABC has determined property is non-viable and will dispose of it in accordance with scattered site strategy.
Scattered Sites 201 MD002/000201 712 E. 20 th St.	1	This unit has been deemed not viable due to an abundance of vacant properties on this block.
Scattered Sites 201 MD002/000201	1 Vacant Lot	To be sold to a developer planning to build new construction townhomes for homebuyers.

PIC Dev.#/AMP & PIC Dev. Name	Number of Units to be Removed	Explanation for Removal
2112 N. Calvert St. A		
Scattered Sites 201 MD002/000201 2112 N. Calvert St. B	1 Vacant Lot	To be sold to a developer planning to build new construction townhomes for homebuyers.
Scattered Sites 201 MD002/000201 2114 N. Calvert St. A	1 Vacant Lot	To be sold to a developer planning to build new construction townhomes for homebuyers.
Scattered Sites 201 MD002/000201 2114 N. Calvert St. B	1 Vacant Lot	To be sold to a developer planning to build new construction townhomes for homebuyers.
Scattered Sites 202 MD002/000202 1113 N. Gilmore St.	1	Unit to be transferred to the Scattered-Sites Homeownership Program and will be sold to the current occupant.
Scattered Sites 203 MD002/000203 2444 Lauretta Ave.	1	Unit to be transferred to the Scattered-Sites Homeownership Program and will be sold to the current occupant.
Scattered Sites 203 MD002/000203 2912 Walbrook Ave.	1	Unit to be transferred to the Scattered-Sites Homeownership Program and will be sold to the current occupant.
Scattered Sites 203 MD002/000203 3907 Park Heights Ave.	1	HABC has determined property is non-viable and will dispose of it in accordance with scattered site strategy.
Scattered Sites 203 MD002/000203 5318 Beaufort Ave.	1	HABC has determined property is non-viable and will dispose of it in accordance with scattered site strategy.
Scattered Sites 203 MD002/000203 5326 Beaufort Ave.	1	HABC has determined property is non-viable and will dispose of it in accordance with scattered site strategy.
Scattered Sites 203 MD002/000203 5330 Beaufort Ave.	1	HABC has determined property is non-viable and will dispose of it in accordance with scattered site strategy.
Stricker Street Apartments MD002/000109 1150 N. Carrollton Ave.	1	This unit has been deemed not viable due to an abundance of vacant properties on this block.
Stricker Street Apartments MD002/000109 1323 Mosher St.	1	This unit has been deemed not viable due to an abundance of vacant properties on this block.
Stricker Street Apartments MD002/000109 1718 W. Presstman St.	1	HABC has determined property is non-viable and will dispose of in accordance with scattered site strategy.

PIC Dev.#/AMP & PIC Dev. Name	Number of Units to be Removed	Explanation for Removal
Stricker Street Apartments MD002/000109 1713 N. Calhoun St.	1	Unit is not viable due to neighborhood conditions and would not provide safe housing for an HABC tenant.
Scattered Sites 200 MD002/000200 2208 Sidney Ave.	1	HABC has determined property is non-viable and will dispose of it in accordance with scattered site strategy.
Scattered Sites 201 MD002/000201 1325 N. Eden St. A	1	This unit was severely damaged by fire and would require an extensive rehabilitation in excess of 57.4% of TDC.
Scattered Sites 201 MD002/000201 1325 N. Eden St. B	1	This unit was severely damaged by fire and would require extensive rehabilitation in excess of 57.4% of TDC.
Scattered Sites 201 MD002/000201 320 E. 20 th St.	1 Vacant Lot	HABC has determined property is non-viable and will dispose of it in accordance with scattered site strategy.
Scattered Sites 202 MD002/000202 625 Pitcher St.	1	This unit has been deemed not viable due to an abundance of vacant properties on this block.
Scattered Sites 202 MD002/000202 1328 Mount St.	1	This unit has been deemed not viable due to an abundance of vacant properties on this block.
Scattered Sites 200 MD002/000200 826 E. North Ave. A	1	Unit is not viable due to neighborhood conditions and would not provide safe housing for an HABC tenant.
Scattered Sites 200 MD002/000200 10 S. Chester St.	1	Unit to be transferred to the Scattered-Sites Homeownership Program and will be sold to the current occupant.
Scattered Sites 200 MD002/000200 12 S. Chester St.	1	Unit to be transferred to the Scattered-Sites Homeownership Program and will be sold to the current occupant.
Scattered Sites 200 MD002/000200 735 E. Preston St.	1	Unit to be transferred to the Scattered-Sites Homeownership Program and will be sold to the current occupant.
Scattered Sites 200 MD002/000200 750 W. Hamburg St.	1	Unit to be transferred to the Scattered-Sites Homeownership Program and will be sold to the current occupant.
Scattered Sites 200 MD002/000200 811 Woodward St.	1	Unit to be transferred to the Scattered-Sites Homeownership Program and will be sold to the current occupant.
Scattered Sites 200 MD002/000200 947 E. Chase St.	1	Unit to be transferred to the Scattered-Sites Homeownership Program and will be sold to the current occupant.

PIC Dev.#/AMP & PIC Dev. Name	Number of Units to be Removed	Explanation for Removal
Scattered Sites 200 MD002/000200 1009 Brentwood Ave.	1	Unit to be transferred to the Scattered-Sites Homeownership Program and will be sold to the current occupant.
Scattered Sites 200 MD002/000200 1121 Race St.	1	Unit to be transferred to the Scattered-Sites Homeownership Program and will be sold to the current occupant.
Scattered Sites 202 MD002/000202 1508 Presstman St.	1	Unit to be transferred to the Scattered-Sites Homeownership Program and will be sold to the current occupant.
Scattered Sites 200 MD002/000200 1617 N. Calvert St.	1	Unit to be transferred to the Scattered-Sites Homeownership Program and will be sold to the current occupant.
Scattered Sites 203 MD002/000203 1731 Hollins St.	1	Unit to be transferred to the Scattered-Sites Homeownership Program and will be sold to the current occupant.
Scattered Sites 201 MD002/000201 1901 Kennedy Ave.	1	Unit to be transferred to the Scattered-Sites Homeownership Program and will be sold to the current occupant.
Scattered Sites 201 MD002/000201 1913 Guilford Ave.	1	Unit to be transferred to the Scattered-Sites Homeownership Program and will be sold to the current occupant.
Scattered Sites 200 MD002/000200 2104 E. Fairmount Ave.	1	Unit to be transferred to the Scattered-Sites Homeownership Program and will be sold to the current occupant.
Scattered Sites 205 MD002/000205 2410 Elsinor Ave.	1	Unit to be transferred to the Scattered-Sites Homeownership Program and will be sold to the current occupant.
Scattered Sites 203 MD002/000203 2843 W. Lafayette Ave.	1	Unit to be transferred to the Scattered-Sites Homeownership Program and will be sold to the current occupant.
Scattered Sites 203 MD002/000203 2927 Walbrook Ave.	1	Unit to be transferred to the Scattered-Sites Homeownership Program and will be sold to the current occupant.
Scattered Sites 203 MD002/000203 4010 Hayward Ave.	1	Unit to be transferred to the Scattered-Sites Homeownership Program and will be sold to the current occupant.
Scattered Sites 200 MD002/000200 826 E. North Ave.	1	Unit is not viable due to neighborhood conditions and would not provide safe housing for an HABC tenant.
Scattered Sites 203 MD002/000203 2109 Chelsea Terr. A	1	Unit is not viable due to neighborhood conditions and would not provide safe housing for an HABC tenant.
Scattered Sites 203	1	Unit is not viable due to neighborhood conditions and would not provide safe housing for an HABC tenant.

PIC Dev.#/AMP & PIC Dev. Name	Number of Units to be Removed	Explanation for Removal
MD002/000203 2109 Chelsea Terr B.		
Scattered Sites 203 MD002/000203 2842 W. North Ave.	1	This unit has been deemed not viable due to an abundance of vacant properties on this block.
Scattered Sites 201 MD002/000201 2100 E. Hoffman St.	1	This unit has been deemed not viable due to an abundance of vacant properties on this block.
Scattered Sites 202 MD002/000202 1843 W. North Ave.	1	This unit has been deemed not viable due to an abundance of vacant properties on this block.
Uptown Apartments MD002/000108 1711 Presstman St. A	1	Unit is not viable due to neighborhood conditions and would not provide safe housing for an HABC tenant.
Uptown Apartments MD002/000108 1711 Presstman St. B	1	Unit is not viable due to neighborhood conditions and would not provide safe housing for an HABC tenant.
Scattered Sites 200 MD002/000200 728 Cumberland St.	1	This unit has been deemed not viable due to an abundance of vacant properties on this block.
Scattered Sites 203 MD002/000203 203 S. Franklinton Ct.	1	Shiple Hill - Unit is not viable due to neighborhood conditions and would not provide safe housing for an HABC tenant. HUD Approved Demolition
Scattered Sites 203 MD002/000203 205 S. Franklinton Ct.	1	Shiple Hill - Unit is not viable due to neighborhood conditions and would not provide safe housing for an HABC tenant. HUD Approved Demolition
Scattered Sites 203 MD002/000203 207 S. Franklinton Ct.	1	Shiple Hill - Unit is not viable due to neighborhood conditions and would not provide safe housing for an HABC tenant. HUD Approved Demolition
Scattered Sites 203 MD002/000203 209 S. Franklinton Ct.	1	Shiple Hill - Unit is not viable due to neighborhood conditions and would not provide safe housing for an HABC tenant. HUD Approved Demolition
Scattered Sites 203 MD002/000203 211 S. Franklinton Ct.	1	Shiple Hill - Unit is not viable due to neighborhood conditions and would not provide safe housing for an HABC tenant. HUD Approved Demolition
Scattered Sites 203 MD002/000203 215 S. Franklinton Ct.	1	Shiple Hill - Unit is not viable due to neighborhood conditions and would not provide safe housing for an HABC tenant. HUD Approved Demolition
Scattered Sites 203 MD002/000203 217 S. Franklinton Ct.	1	Shiple Hill - Unit is not viable due to neighborhood conditions and would not provide safe housing for an HABC tenant. HUD Approved Demolition
Scattered Sites 203 MD002/000203 219 S. Franklinton Ct.	1	Shiple Hill - Unit is not viable due to neighborhood conditions and would not provide safe housing for an HABC tenant. HUD Approved Demolition

PIC Dev.#/AMP & PIC Dev. Name	Number of Units to be Removed	Explanation for Removal
Scattered Sites 203 MD002/000203 221 S. Franklinton Ct.	1	Shipley Hill - Unit is not viable due to neighborhood conditions and would not provide safe housing for an HABC tenant. HUD Approved Demolition
Scattered Sites 202 MD002/000202 1338 N. Mount St. A	1	This unit has been deemed not viable due to an abundance of vacant properties on this block.
Scattered Sites 202 MD002/000202 1338 N. Mount St. B	1	This unit has been deemed not viable due to an abundance of vacant properties on this block.
Scattered Sites 203 MD002/000203 2482 Shirley Ave	1	Oswego Mall - Unit is not viable due to neighborhood conditions and would not provide safe housing for an HABC tenant.
Scattered Sites 203 MD002/000203 2484 Shirley Ave.	1	Oswego Mall - Unit is not viable due to neighborhood conditions and would not provide safe housing for an HABC tenant.
Scattered Sites 203 MD002/000203 2504 Shirley Ave.	1	Oswego Mall - Unit is not viable due to neighborhood conditions and would not provide safe housing for an HABC tenant.
Scattered Sites 203 MD002/000203 2533 W. Pratt St.	1	Shipley Hill - Unit is not viable due to neighborhood conditions and would not provide safe housing for an HABC tenant. HUD Approved Demolition.
Scattered Sites 203 MD002/000203 2535 W. Pratt St.	1	Shipley Hill - Unit is not viable due to neighborhood conditions and would not provide safe housing for an HABC tenant. HUD Approved Demolition .
Scattered Sites 203 MD002/000203 2550 McHenry St.	1	Shipley Hill - Unit is not viable due to neighborhood conditions and would not provide safe housing for an HABC tenant. HUD Approved Demolition.
Scattered Sites 203 MD002/000203 2601 Oswego Ave.	1	Oswego Mall - Unit is not viable due to neighborhood conditions and would not provide safe housing for an HABC tenant.
Scattered Sites 203 MD002/000203 2607 Oswego Ave.	1	Oswego Mall - Unit is not viable due to neighborhood conditions and would not provide safe housing for an HABC tenant.
Scattered Sites 203 MD002/000203 2609 Oswego Ave.	1	Oswego Mall - Unit is not viable due to neighborhood conditions and would not provide safe housing for an HABC tenant.
Scattered Sites 203 MD002/000203 2613 Oswego Ave.	1	Oswego Mall - Unit is not viable due to neighborhood conditions and would not provide safe housing for an HABC tenant.
Scattered Sites 203 MD002/000203 2615 Oswego Ave.	1	Oswego Mall - Unit is not viable due to neighborhood conditions and would not provide safe housing for an HABC tenant.

PIC Dev.#/AMP & PIC Dev. Name	Number of Units to be Removed	Explanation for Removal
Scattered Sites 203 MD002/000203 4003 Oswego Ct.	1	Oswego Mall - Unit is not viable due to neighborhood conditions and would not provide safe housing for an HABC tenant.
Scattered Sites 203 MD002/000203 4004 Oswego Ct.	1	Oswego Mall - Unit is not viable due to neighborhood conditions and would not provide safe housing for an HABC tenant.
Scattered Sites 203 MD002/000203 4005 Oswego Ct.	1	Oswego Mall - Unit is not viable due to neighborhood conditions and would not provide safe housing for an HABC tenant.
Scattered Sites 203 MD002/000203 4008 Oswego Ct.	1	Oswego Mall - Unit is not viable due to neighborhood conditions and would not provide safe housing for an HABC tenant.
Scattered Sites 203 MD002/000203 4012 Oswego Ct.	1	Oswego Mall - Unit is not viable due to neighborhood conditions and would not provide safe housing for an HABC tenant.
Scattered Sites 203 MD002/000203 4013 Oswego Ct.	1	Oswego Mall - Unit is not viable due to neighborhood conditions and would not provide safe housing for an HABC tenant.
Scattered Sites 203 MD002/000203 4014 Oswego Ct.	1	Oswego Mall - Unit is not viable due to neighborhood conditions and would not provide safe housing for an HABC tenant.
Scattered Sites 203 MD002/000203 4019 Oswego Ct.	1	Oswego Mall - Unit is not viable due to neighborhood conditions and would not provide safe housing for an HABC tenant.
Scattered Sites 203 MD002/000203 8 S. Catherine St.	1	Unit is not viable due to neighborhood conditions and would not provide safe housing for an HABC tenant.
Scattered Sites 206 MD002/000206 130 S. Central Ave.	1	Commercial building to be sold as part of Albemarle Square RAD project.
Scattered Sites 203 MD002/000203 201 S. Franklinton Ct.	1	Shipley Hill - Unit is not viable due to neighborhood conditions and would not provide safe housing for an HABC tenant. HUD Approved Demolition
Scattered Sites 203 MD002/000203 213 S. Franklinton Ct.	1	Shipley Hill - Unit is not viable due to neighborhood conditions and would not provide safe housing for an HABC tenant. HUD Approved Demolition
Scattered Sites 203 MD002/000203 223 S. Franklinton Ct.	1	Shipley Hill - Unit is not viable due to neighborhood conditions and would not provide safe housing for an HABC tenant. HUD Approved Demolition
Uptown Apartments MD002/000108 1133 N. Carrollton Ave.	1	This unit has been deemed not viable due to an abundance of vacant properties on this block.
Scattered Sites 201 MD002/000201	1	This unit has been deemed not viable due to an abundance of vacant properties on this block.

PIC Dev.#/AMP & PIC Dev. Name	Number of Units to be Removed	Explanation for Removal
2100 E. Hoffman St.		
Scattered Sites 203 MD002/000203 2478 Shirley Ave.	1	Oswego Mall - Unit is not viable due to neighborhood conditions and would not provide safe housing for an HABC tenant.
Scattered Sites 203 MD002/000203 2480 Shirley Ave.	1	Oswego Mall - Unit is not viable due to neighborhood conditions and would not provide safe housing for an HABC tenant.
Scattered Sites 203 MD002/000203 2500 Shirley Ave.	1	Oswego Mall - Unit is not viable due to neighborhood conditions and would not provide safe housing for an HABC tenant.
Scattered Sites 203 MD002/000203 2502 Shirley Ave.	1	Oswego Mall - Unit is not viable due to neighborhood conditions and would not provide safe housing for an HABC tenant.
Scattered Sites 203 MD002/000203 2537 W. Pratt St.	1	Shipley Hill - Unit is not viable due to neighborhood conditions and would not provide safe housing for an HABC tenant. HUD Approved Demolition
Scattered Sites 203 MD002/000203 2539 W. Pratt St.	1	Shipley Hill - Unit is not viable due to neighborhood conditions and would not provide safe housing for an HABC tenant. HUD Approved Demolition
Scattered Sites 203 MD002/000203 2544 McHenry St.	1	Shipley Hill - Unit is not viable due to neighborhood conditions and would not provide safe housing for an HABC tenant. HUD Approved Demolition
Scattered Sites 203 MD002/000203 2546 McHenry St.	1	Shipley Hill - Unit is not viable due to neighborhood conditions and would not provide safe housing for an HABC tenant. HUD Approved Demolition
Scattered Sites 203 MD002/000203 2548 McHenry St.	1	Shipley Hill - Unit is not viable due to neighborhood conditions and would not provide safe housing for an HABC tenant. HUD Approved Demolition
Scattered Sites 203 MD002/000203 2552 McHenry St.	1	Shipley Hill - Unit is not viable due to neighborhood conditions and would not provide safe housing for an HABC tenant. HUD Approved Demolition
Scattered Sites 203 MD002/000203 2554 McHenry St.	1	Shipley Hill - Unit is not viable due to neighborhood conditions and would not provide safe housing for an HABC tenant. HUD Approved Demolition
Scattered Sites 203 MD002/000203 2603 Oswego Ave.	1	Oswego Mall - Unit is not viable due to neighborhood conditions and would not provide safe housing for an HABC tenant.
Scattered Sites 203 MD002/000203 2605 Oswego Ave.	1	Oswego Mall - Unit is not viable due to neighborhood conditions and would not provide safe housing for an HABC tenant.

PIC Dev.#/AMP & PIC Dev. Name	Number of Units to be Removed	Explanation for Removal
Scattered Sites 203 MD002/000203 2611 Oswego Ave.	1	Oswego Mall - Unit is not viable due to neighborhood conditions and would not provide safe housing for an HABC tenant.
Scattered Sites 203 MD002/000203 2801 Rockrose Ave.	1	HABC has determined property is non-viable and will dispose of it in accordance with scattered site strategy.
Scattered Sites 203 MD002/000203 3522 Overview Rd.	1	HABC has determined property is non-viable and will dispose of it in accordance with scattered site strategy.
Scattered Sites 203 MD002/000203 4000 Oswego Ct.	1	Oswego Mall - Unit is not viable due to neighborhood conditions and would not provide safe housing for an HABC tenant.
Scattered Sites 203 MD002/000203 4001 Oswego Ct.	1	Oswego Mall - Unit is not viable due to neighborhood conditions and would not provide safe housing for an HABC tenant.
Scattered Sites 203 MD002/000203 4002 Oswego Ct.	1	Oswego Mall - Unit is not viable due to neighborhood conditions and would not provide safe housing for an HABC tenant.
Scattered Sites 203 MD002/000203 4006 Oswego Ct.	1	Oswego Mall - Unit is not viable due to neighborhood conditions and would not provide safe housing for an HABC tenant.
Scattered Sites 203 MD002/000203 4007 Oswego Ct.	1	Oswego Mall - Unit is not viable due to neighborhood conditions and would not provide safe housing for an HABC tenant.
Scattered Sites 203 MD002/000203 4009 Oswego Ct.	1	Oswego Mall - Unit is not viable due to neighborhood conditions and would not provide safe housing for an HABC tenant.
Scattered Sites 203 MD002/000203 4010 Oswego Ct.	1	Oswego Mall - Unit is not viable due to neighborhood conditions and would not provide safe housing for an HABC tenant.
Scattered Sites 203 MD002/000203 4011 Oswego Ct.	1	Oswego Mall - Unit is not viable due to neighborhood conditions and would not provide safe housing for an HABC tenant.
Scattered Sites 203 MD002/000203 4015 Oswego Ct.	1	Oswego Mall - Unit is not viable due to neighborhood conditions and would not provide safe housing for an HABC tenant.
Scattered Sites 203 MD002/000203 4016 Oswego Ct.	1	Oswego Mall - Unit is not viable due to neighborhood conditions and would not provide safe housing for an HABC tenant.
Scattered Sites 203 MD002/000203 4017 Oswego Ct.	1	Oswego Mall - Unit is not viable due to neighborhood conditions and would not provide safe housing for an HABC tenant.

PIC Dev.#/AMP & PIC Dev. Name	Number of Units to be Removed	Explanation for Removal
Scattered Sites 203 MD002/000203 4018 Oswego Ct.	1	Oswego Mall - Unit is not viable due to neighborhood conditions and would not provide safe housing for an HABC tenant.
Scattered Sites 202 MD002/000202 1332 N. Fremont Ave. A	1	This unit has been deemed not viable due to an abundance of vacant properties on this block.
Scattered Sites 202 MD002/000202 1332 N. Fremont Ave. B	1	This unit has been deemed not viable due to an abundance of vacant properties on this block.
Midtown Apartments MD002/000103 1429 Riggs Ave.	1	Unit to be transferred to the Scattered-Sites Homeownership Program and will be sold to the current occupant.
Scattered Sites 200 MD002/000200 825 E. Chase St.	1	Unit to be transferred to the Scattered-Sites Homeownership Program and will be sold to the current occupant.
Scattered Sites 200 MD002/000200 2013 E. Fairmount Ave.	1	Unit to be transferred to the Scattered-Sites Homeownership Program and will be sold to the current occupant.
Scattered Sites 200 MD002/000200 2034 E. Baltimore St.	1	Unit to be transferred to the Scattered-Sites Homeownership Program and will be sold to the current occupant.
Scattered Sites 201 MD002/000201 403 E. 27 th St.	1	Unit to be transferred to the Scattered-Sites Homeownership Program and will be sold to the current occupant.
Scattered Sites 203 MD002/000203 1304 W. Lombard St.	1	Unit to be transferred to the Scattered-Sites Homeownership Program and will be sold to the current occupant.
Scattered Sites 201 MD002/000201 338 E. 26 th St.	1	Unit to be transferred to the Scattered-Sites Homeownership Program and will be sold to the current occupant.
Scattered Sites 203 MD002/000203 3220 Avondale Ave.	1	Unit to be transferred to the Scattered-Sites Homeownership Program and will be sold to the current occupant.
Scattered Sites 200 MD002/000200 1805 Barclay St.	1	Unit to be transferred to the Scattered-Sites Homeownership Program and will be sold to the current occupant.
Scattered Sites 205 (Bailey) MD002/000205 4619 Parkwood Ave.	1	Unit to be transferred to the Scattered-Sites Homeownership Program and will be sold to the current occupant.

PIC Dev.#/AMP & PIC Dev. Name	Number of Units to be Removed	Explanation for Removal
Scattered Sites 201 MD002/000201 2013 E. 32 nd St.	1	Unit to be transferred to the Scattered-Sites Homeownership Program and will be sold to the current occupant.
Stricker Steet Apartments MD002/000109 1143 N. Stricker St.	1	Unit to be transferred to the Scattered-Sites Homeownership Program and will be sold to the current occupant.
Uptown Apartments MD002/000108 1502 N. Mount St.	1	Unit to be transferred to the Scattered-Sites Homeownership Program and will be sold to the current occupant.
Scattered Sites 202 MD002/000202 1113 Mosher St.	1	This unit has been deemed not viable due to an abundance of vacant properties on the block.
Scattered Sites 203 MD002/000203 118 N. Mount St.	1	This unit has been deemed not viable due to an abundance of vacant properties on the block.
Scattered Sites 203 MD002/000203 306 N. Mount St.	1	This unit has been deemed not viable due to an abundance of vacant properties on the block.
Scattered Sites 202 MD002/000202 521 N. Fulton St.	1	This unit has been deemed not viable due to an abundance of vacant properties on the block.
Scattered Sites 203 MD002/000203 610 N. Dukeland St.	1	This unit has been deemed not viable due to an abundance of vacant properties on the block.
Scattered Sites 201 MD002/000201 1126 E. 20 th St.	1	This unit has been deemed not viable due to an abundance of vacant properties on the block.
Scattered Sites 203 MD002/000203 1629 W. Mulberry St.	1	This unit has been deemed not viable due to an abundance of vacant properties on the block.
Scattered Sites 201 MD002/000201 1644 N. Washington St.	1	This unit has been deemed not viable due to an abundance of vacant properties on the block.
Scattered Sites 203 MD002/000203 1829 W. Mulberry St.	1	This unit has been deemed not viable due to an abundance of vacant properties on the block.
Scattered Sites 202 MD002/000202 1910 Mosher St.	1	This unit has been deemed not viable due to an abundance of vacant properties on the block.
Scattered Sites 203 MD002/000203 2906 Ridgewood Ave.	1	This unit has been deemed not viable due to an abundance of vacant properties on the block.

PIC Dev.#/AMP & PIC Dev. Name	Number of Units to be Removed	Explanation for Removal
Scattered Sites 202 MD002/000202 1716 Laurens St.	1 Vacant Lot	HABC has determined property is non-viable and will dispose of it in accordance with scattered site strategy
Scattered Sites 203 MD002/000203 21 S. Hilton St.	1	This unit has been deemed not viable due to an abundance of vacant properties on this block.
Scattered Sites 203 MD002/000203 1719 W. Baltimore St.	1	Unit is not viable due to neighborhood conditions and would not provide safe housing for an HABC tenant.
Scattered Sites 203 MD002/000203 3523 Virginia Ave.	1	Unit is not viable due to neighborhood conditions and would not provide safe housing for an HABC tenant.
Scattered Sites 203 MD002/000203 4823 Palmer Ave.	1	This unit has been deemed not viable due to an abundance of vacant properties on this block.
Scattered Sites 202 MD002/000202 1707 N. Mount St.	1	This unit has been deemed not viable due to an abundance of vacant properties on this block.
Scattered Sites 202 MD002/000202 1436 N. Mount St.	1	Unit is not viable due to neighborhood conditions and would not provide safe housing for an HABC tenant.
Scattered Sites 202 MD002/000202 2500 Jefferson St.	1	Unit is not viable due to neighborhood conditions and would not provide safe housing for an HABC tenant.
Scattered Sites 200 MD002/000202 814 E. North Ave.	1	Unit is not viable due to neighborhood conditions and would not provide safe housing for an HABC tenant.
Uptown Apartments MD 002000108 1018 N. Gilmor St.	1	HABC has determined property is non-viable and will dispose of it in accordance with scattered site strategy.
TOTAL	809	

iii. Planned New Project-Based Vouchers

HABC plans to enter into an Agreement to Enter into Housing Assistance Payment (AHAP) Contracts or HAP contracts for 308 new project-based units in FY 2026, as shown in Table 3. Actual contract/leasing figures may vary based on multiple factors, including new and/or additional projects approved by the HABC Board during the Plan Year, HUD RAD processing timetables and other considerations.

Table 3: Planned New Project-Based Vouchers

Property Name	Number of Vouchers to be Project-Based	RAD?	Description of Project
Beacon Communities	38	No	RFP B-1922-20 – one 12-unit project and one 26-unit project at 1101 N Wolfe St.
New Shiloh 3	17	No	RFP B-1922-20 – one 17-unit project awarded for 2300 N Monroe St
Walbrook Mills II	4	No	RFP B-1922-20 – one 4-unit project awarded for 2636 W North Ave
Greens at Irvington Mews II	40	No	RFP B-1922-20 – one 40-unit project awarded
Sojourner at Falls	100	No	RFP B-2023-24 – one 100-unit project awarded (75-1bd, 25-2bd)
Clare Court II	10	No	RFP B-1922-20 – one 10-unit project awarded
Westport Parcel	8	No	RFP B-2021-24 – one 8-unit project awarded
Sojourner at Park	21	No	RFP 1922-20 – on 21-unit project awarded
Dukeland	30	Yes	RAD conversion; Family housing
Renaissance at Reservoir Hill	40	Yes	RAD PBV or RAD/Section 18 Blend. Family development. 1-to-5-bedroom units.
Total Planned New Project-Based Vouchers	308		

iv. Existing Project-Based Vouchers

HABC will continue to provide voucher-based operating support for a large portfolio of existing units under contract in the PBV program or units for which an Agreement to Enter into Housing Assistance Payments (AHAP) Contract is in place. Table 4 includes only those project-based vouchers in which at least an AHAP is planned to be in place as of 12/31/2025. As noted, there are 3,896 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	Status at the End of 2025	RAD?	Description of Project
1234 McElderry - Somerset Phase I	50	Leased	No	13 1bd, 24 2bd and 13 3bd units for PH replacement at

Property Name	Number of Project-Based Vouchers	Status at the End of 2025	RAD?	Description of Project
				1234 McElderry St.
18 W. Read St., Inc.	10	Leased	No	10 1bd NED units at 18 W. Read St.
214 E. Biddle St.	5	Leased	No	5 1bd NED units at 214 E. Biddle St.
22 Light Street Apts	2	Leased	No	2 LTA UFAS units located at 22 Light Street.
2301 N. Charles St., Inc.	7	Leased	No	2 efficiencies and 5 1bd NED/UFAS units at 2301 N. Charles St.
Alcott Place	28	Leased	No	28 1bd units at 2702 Keyworth Ave.
Arbor Oaks	7	Committed	Yes	Conversion of 62 public housing units to a RAD/Section 18 Blend; 7 RAD PBV and 55 regular PBV. Renovation of all walk-up units in 3 garden apt. communities
Arbor Oaks (non-RAD)	55	Committed	No	Conversion of 62 public housing units to a RAD/Section 18 Blend; 7 RAD PBV and 55 regular PBV. Renovation of all walk-up units in 3 garden apt. communities
Arbor Oaks (non-RAD, LIHTC conversion)	144	Committed	No	Conversion of LIHTC units to PBV. Renovation of all walk-up units in 3 garden apartment communities.
Artaban Ashburton Apartments	14	Leased	No	14 1bd NED units at 5906 Park Heights Ave.
Ashland Commons	12	Leased	No	12 1bd (8-NED) units at 1715 E Eager St.
Barclay	19	Leased	No	1 1bd, 1 2bd, and 17 3bd (1-NED, 4-UFAS) units at 2106-2234 Barclay St.
Barclay II (North Barclay Green)	15	Leased	No	11 1bd NED and 4 2bd UFAS units at 341 E. 20th St.
Barrister Court	8	Leased	No	2 efficiencies, 5 1bd, and 1 2bd UFAS unit at 1300 Washington Blvd.
Beacon House Square	56	Committed	No	56 units located at 3549-

Property Name	Number of Project-Based Vouchers	Status at the End of 2025	RAD?	Description of Project
				3601 Old Frederick Road with a designation for PB for Veterans
Bellevue Manchester	8	Leased	No	8 1bd units at 342 Bloom St.
Belvedere Place	11	Committed	No	11 units thru competitive process at 3101 W Belvedere Ave applied to RFP B-1922-20.
Belvue Gardens	10	Leased	No	10 1bd NED units at 3915-3921 Belvue Ave.
Bennett House	25	Leased	No	24 SROs and 1 1bd unit at 14 E Franklin St. designated to provide supportive services to low-income residents
Berger Square (Thompson)	10	Leased	No	A project located in Odenton in Anne Arundel County, near transit, employment centers near Fort Meade and Arundel Mills, and close to the MARC station.
Bon Secours – Gibbons	20	Leased	No	12 1bd NEDs, 4 2bd and 4 3bd UFAS units at 900 Desoto Rd.
Bon Secours – New Shiloh	19	Leased	No	16 1bd (11-NED), 2 2bd and 1 3bd units at 1930 Windsor Ave. (8-PB Homeless)
Brexton Chase	7	Leased	No	7 1bd NED units at 241 W. Chase St.
Brick by Brick	2	Leased	No	2 1bd NED units at 903 Gorsuch Ave.
Burgess Mills (Thompson)	20	Leased	No	A 198 unit mixed-income project located in Ellicott City in Howard County.
Butchers Row	9	Leased	No	3 1bd, 2 2bd, and 4 3bd units at E. Baltimore St.
Calvert Street Properties	18	Leased	No	18 1bd NED units at 1625 N. Calvert St.
Calverton House	14	Leased	No	13 SROs and 1 efficiency at 119 E. 25th St.
Carey House	23	Committed	Yes	RAD PBV. Renovation of dwelling units for elderly persons over 62 years old and non-elderly persons with

Property Name	Number of Project-Based Vouchers	Status at the End of 2025	RAD?	Description of Project
				disabilities. Located in West Baltimore.
Chapel Green	20	Leased	No	8 1bd NED units and 12 3bd (4-UFAS) units at Chase, Wolfe, and Washington Streets
Cherry Hill Senior Housing	50	Leased	No	48 1bd NED units and 2 2bd UFAS units at 901 Cherry Hill Rd.
Cherrydale	32	Leased	No	32 1bd NED units at 1118 Cherry Hill Rd.
City Arts	11	Leased	No	11 1bd NED units at 440 E. Oliver St.
City Arts II	15	Leased	No	12 1bd NED and 3 2bd UFAS units at 1700 Greenmount Ave.
Clare Court Apartments	15	Leased	No	5 1bd, 7 2bd and 3 4bd (7-NED, and 3-UFAS) units at 3725 Ellerslie Ave.
Clarks Lane	6	Leased	No	6 1bd NED units at 3901 Clarks Ln.
Clarksvew, LLC	8	Leased	No	8 1bd NED units at 3701-3711 Clarks Ln.
Coel-Grant Higgs	57	Leased	No	32 efficiencies and 25 1bd (6-UFAS) units at 1700 N Gay St.
Coleman Manor	49	Leased	No	49 1bd (8-NED, 5-UFAS) units at Walbrook Ave.
Columbus School Apts.	8	Leased	No	8 1bd units at 2000 E North Ave
Community Housing	6	Leased	No	1 efficiency, 1 1bd, 1 2bd, and 3 3bd scattered site units
Dayspring	18	Leased	No	17 2bd and 1 3bd transitional units at
DiMaggio Scattered Sites	23	Leased	No	8 2bd, 10 3bd, 4 4bd, and 1 5bd units designated for chronically homeless households at scattered sites
Dominion Properties	7	Leased	No	3 1bd NED units and 4 3bd units at 1617 Dukeland Ave., 6th St., Hilton and Monument Streets

Property Name	Number of Project-Based Vouchers	Status at the End of 2025	RAD?	Description of Project
Dorchester Apts.	10	Leased	No	10 1bd NED units at 4300 Liberty Heights Ave.
Druid Hill LTD	12	Leased	No	10 2 bd and 2 3bd units at 1621 Druid Hill Ave.
Druid House	19	Leased	No	8 2bd and 11 3bd units at McCulloh St.
Eagle Park (Thompson)	12	Leased	No	New construction in Hanover in Anne Arundel County, with 12 project-based units.
Ellicott Gardens II (Thompson)	14	Leased	No	A 70-unit project located in Ellicott City in Howard County, a second phase of an existing project.
Epiphany House	33	Leased	No	33 efficiencies at 5610 York Rd.
Fallstaff Apts.	4	Leased	No	2 1bd NED units, 1 2bd and 1 3bd (1-UFAS) units at 3800-3810 Fallstaff Rd.
Fells Point Station	14	Leased	No	11 1bd and 3 2bd (6-NED, 8-UFAS) units at 1621 Bank St.
Flamingo Apartments	1	Leased	No	1 3bd LTA UFAS unit located at 3900 Conduit Ave
Four Ten Loft Apts	20	Leased	No	20 – 1bd units at 410 N Eutaw St designated to homeless.
Franklin Flats	7	Leased	No	7 1bd NED units at 20 E. Franklin St.
Greenmount & Chase	19	Leased	No	19 units (11-1bd, 5-2bd, 3-3bd) consisting of 2 LTA NEDs, 2 LTA UFAS and 4 units designated for chronically homeless.
Greens at Irvington Mews	20	Leased	No	20 – 1bd NED units at 4300 Frederick Ave.
Greens at Irvington Mews II	12	Committed	No	12 units awarded under RFP B-1922-20 at 200 Block of S Woodington Rd
Harry & Jeannette Weinberg Place	116	Leased	No	39-0bd, 74-1bd, and 3-2bd units at 2500 W. Belvedere Ave.
Holden Hall	14	Leased	No	14 SRO units at 761 W. Hamburg St.

Property Name	Number of Project-Based Vouchers	Status at the End of 2025	RAD?	Description of Project
Hollander Ridge	94	Leased	Yes	19 – 1bd, 32-2bd, 35-3bd, and 8-4bd units converted from LIPH to PBV located at scattered units through Baltimore City.
Homes at Fountain Green (Thompson)	10	Leased	No	New construction in Harford County, of which 10 units will be BRHP project-based units. Project is currently at 97% construction completion and leasing will begin in coming month
Indecco	9	Leased	No	2 efficiencies and 7 1bd units at 940 S. Lakewood Ave.
Independence Place	21	Leased	No	11 1bd and 10 2bd units designated for chronically homeless households at 4101½ Old York Rd.
Irvington Woods	71	Leased	No	11 1bd NED and 46 2bd units at 4102-4126 Potter St.
Jbyrd	3	Leased	No	3 1bd NED units at Windsor Mill Rd.
Jenkins House	22	Leased	No	20 SRO and 2 1bd units at 2226 Maryland Ave.
John Manley House	5	Leased	No	5 1bd NED units at 5304 Harford Rd.
Keys Point Phase 1A O'Donnell Heights	39	Leased	No	16 1bd (12-NED) units, 12 2bd units, 13 3bd units, and 1 4bd unit (4-UFAS)
Keys Pointe – Phase 1B	34	Leased	No	19 1bd, 8 2bd, 4 3bd and 3 4bd (11-NED, 4-UFAS) units at Cardiff, Jarmon, Hornell, Boston and Gallop Streets
L on Liberty	14	Leased	No	14 1bd (all NED) units at 216 N Liberty St.
Laurens House	36	Committed	Yes	RAD PBV. Renovation of all dwelling units for elderly persons over 62 years old and non-elderly persons with disabilities. Located in West Baltimore.
Lillian Jones Apts.	22	Leased	No	14 1bd NED, 2-2bd and 6-3bd UFAS units at 1303

Property Name	Number of Project-Based Vouchers	Status at the End of 2025	RAD?	Description of Project
				Greenmount Ave.
M on Madison	23	Leased	No	23 1bd NED units at 301 W. Madison St.
Marian House	8	Leased	No	4 SRO and 4 3bd units at 949 Gorsuch Ave.
Marian House II	5	Leased	No	5 1bd (3-NED, 2-UFAS) units at 932 Gorsuch Ave.
Mary Harvin Center	8	Leased	No	8 1bd units at 1600 N. Chester St.
Metro Heights at Mondawmin	18	Leased	No	13 1 bd, 2 2bd and 3 3 bd (10-NED, 1-UFAS) units, some designated for chronically homeless households at 2700 Reisterstown Rd.
Milford Station	6	Leased	No	6 1bd NED units at 3900 W. Northern Pkwy.
Moravia	60	Leased	No	57 1bd and 3 2bd units (9-NED, 6-UFAS) at 6050 Moravia Park Dr.
Mount Royal Apts.	5	Leased	No	5 1bd units at 1512 W. Mt. Royal Ave.
Mulberry at Park Apts.	19	Leased	No	11 1bd NED units, 2 2bd and 6 3bd UFAS units at 211 W. Mulberry St.
North Avenue Gateway	16	Leased	No	11 1bd NED units and 5 2bd units at 3001-3003 W. North Ave.
North Avenue Gateway II	16	Leased	No	10 1 bd NED units and 6 1bd units at 3044 W. North Ave designated for chronically homeless.
North Barclay Green III	12	Leased	No	9 1bd units and 3 3bd UFAS units at E. 21st St. and Greenmount Ave.
Oaks at Liberty	45	Leased	No	45 1bd units at 3501 Howard Park Ave.
Orchard Ridge I-V	197	Leased	No	119 1bd units, 42 2bd units, 32 3bd units, 3 4bd units and 1 5bd unit (52-NED, 27-UFAS) at Orchard Ridge Blvd., Green Rose and Maple Shade Dr.

Property Name	Number of Project-Based Vouchers	Status at the End of 2025	RAD?	Description of Project
Paca House	82	Leased	No	41 efficiencies and 41 1bd units at 116 N. Paca St. 63 units are designated for homeless and 19 units for veteran populations.
Parktown-Cason Arms	12	Leased	No	8 1bd NED units and 4 2bd UFAS units at 4637 Park Heights Ave.
Parkwood	3	Leased	No	3 1bd NED units at scattered sites
Pedestal Gardens	25	Leased	No	25 1bd units located at 1613-1617 Eutaw Place
Penn North	15	Leased	No	14 1bd NED units and 1 3bd UFAS unit at 2600 Pennsylvania Ave.
Penn Square II	15	Leased	No	12 1bd NED and 3 3bd UFAS units at 2600 Pennsylvania Ave.
Perkins 1	28	Leased/Issued	No	28 units at PSO
Perkins 1 (RAD)	20	Leased	Yes	20 RAD PBV units at PSO
Perkins 2A	50	Leased	No	LTA PBV units at PSO
Perkins 2B	26	Leased	No	LTA PBV units at PSO
Perkins 3	71	Committed	No	Blend of market rate, LIHTC and PBV units
Perkins 4A & 4B	78	Committed	No	Blend of market rate, LIHTC and PBV units. 23 units in P4A and 55 in P4B.
Perkins 5A	34	Committed		Perkins 5 contains a blend of market rate, LIHTC and PBV units
Perkins 5B	35	Committed		Perkins 5 contains a blend of market rate, LIHTC and PBV units
Perkins 5C	35	Committed		Perkins 5 contains a blend of market rate, LIHTC and PBV units
Poppleton II	15	Leased	No	11 1bd NED units and 4 3bd UFAS units at 838 W. Fairmount Ave.
Poppleton III	10	Leased	No	7 1bd NED units, 1 2bd UFAS and 2 3bd UFAS units at 866 W. Fayette St.
Pratt Street	35	Leased	No	27 2bd and 8 3bd units at

Property Name	Number of Project-Based Vouchers	Status at the End of 2025	RAD?	Description of Project
				1700 W Pratt St. – transitional housing
Red Maple Place (Thompson)	10	Committed	No	56-unit project in Towson in Baltimore County.
Restoration Gardens	43	Leased	No	40 efficiencies and 3 1bd units designated for homeless youth at 3701 Cottage Ave.
Restoration Gardens II	42	Leased	No	42 efficiencies (3-UFAS units) designated for homeless youth at 4201 York Rd.
Rye House	9	Leased	No	9 units awarded under RFP B-1922-20 at 255 Atlas St, Baltimore, MD 21230
Scattered Sites – Fort 700 (Thompson)	5	Leased	No	Scattered site units in high-opportunity areas throughout the region.
Scattered Sites -Harford Home Rentals (Thompson)	10	Leased	No	Scattered site units in high-opportunity areas throughout the region.
Scattered Sites -Pilatus Opportunity Fund (Thompson)	36	Leased	No	Scattered site units in high-opportunity areas throughout the region.
Seminole Apartments	6	Leased	No	6 1bd NED units at 4300 Seminole Ct.
Sharon Towers	10	Leased	No	10 2bd units at 4-6 N. Carey St.
Sharp Leadenhall	4	Leased	No	4 1bd units (3-UFAS) at Race and West Streets
Sharp Leadenhall (RAD)	23	Committed	Yes	RAD PBV or RAD/Section 18 Blend. Family development. 1 to 5 bedroom units
Silver Park West	24	Leased	No	8 2-bd units, 13 3-bd units and 3 4-bd units at 420-568 Orchard St (HUD awarded Opt Out for PBVs).
Sojourner at Argyle Apartments	12	Leased	No	12 1bd (2-UFAS) units designated for chronically homeless households at 1411 Argyle St.
Sojourner Place at Preston	35	Leased	No	25-1bd, 5-2b, and 5-3bd units located at 1201 E Preston St.

Property Name	Number of Project-Based Vouchers	Status at the End of 2025	RAD?	Description of Project
Somerset 2 (520 Somerset Apartments)	44	Leased	Yes	44 RAD PBV units at PSO 520 Somerset Street
Somerset 2 (525 Aisquith Apartments)	23	Leased	Yes	23 RAD PBV units at PSO 525 Aisquith Street
Somerset 2 (525 Aisquith)	33	Leased	No	33 PBV Blend Units at PSO
Somerset 3 (420 Aisquith)	15	Leased	Yes	15 RAD PBV units at PSO
Somerset 3 (420 Aisquith) (The Ruby)	21	Leased	No	21 LTA PBV units at PSO
Somerset 4	66	Committed	No	Somerset Phase 4 is a part of the larger Perkins Somerset Oldtown (PSO) project, upon completion the project will include 1,353 units of mixed income housing. 66 units will be LTA PBV units. (61 @4% and 5 @ 5%)
Somerset Court Extensions	7	Leased	No	7 PBV units designated for NEDs
St. Stephens	15	Leased	No	15 1bd NED units at 3900 Roland Ave.
St. Vincent DePaul	9	Leased	No	8 2bd and 1 3bd units at Ulman Ave.
St. Vincent DePaul	5	Leased	No	1 3bd and 4 4bd units designated for chronically homeless households at Bond St. and Cottage Ave.
Symphony Home at Purdue	6	Leased	No	6 1bd units at 5683 Purdue Ave.
Townes at the Terraces	20	Committed	Yes	Blend of RAD PBV and PBV. This project is located within a Choice Neighborhoods Transformation Plan footprint in Southwest Baltimore and will include the complete renovation of all rental dwelling units
Townes at the Terraces	182	Committed	No	Blend of RAD PBV and PBV. This project is located within a Choice Neighborhoods Transformation Plan footprint in Southwest

Property Name	Number of Project-Based Vouchers	Status at the End of 2025	RAD?	Description of Project
				Baltimore and will include the complete renovation of all rental dwelling units
Union Ave. – Buena Vista Apartments	48	Leased	Yes	15 1 bd and 33 2 bd units converted through Rental Assistance Demonstration (RAD-2) at 1420-1436 Union Ave.
Uplands	62	Leased	No	24 1bd, 31 2bd, and 7 3bd units (16-NED, 6-UFAS) at 4520 Scarlet Oak Ln.
Uplands Phase 2A	22	Leased/Issued	No	4 1-bd, 12 2-bd, and 6 3-bd units at Edmondson Ave, Willow Oak Dr, and Birch Ave.
Uplands Phase 2B	25	Leased/Issued	No	3 1-bd, 6 2-bd, and 16 3-bd units at Amur Ln, Edmondson Ave, and Old Frederick Rd.
Walbrook Mills Apts	1	Leased	No	1 3bd (UFAS) unit at 2636 W North Ave.
Wayland Village	45	Leased	No	45 1bd (14-NED) units at 3020 Garrison Blvd.
Weinberg Family Center – 1209 Rose	8	Leased	No	5 2bd and 3 3bd units designated for chronically homeless households at 1209 N. Rose St.
Weinberg Family Center – Guadenzia at Park Heights	18	Leased	No	14 2bd and 4 3bd units designated for chronically homeless households at 4613 Park Heights Ave
Weinberg Manor East	75	Leased	No	10 SRO, 41 efficiencies, and 24 1bd units (10-NED, 5-UFAS) at 3601 Fords Ln.
Weinberg Manor South	14	Leased	No	14 1bd NED units at 3617 Fords Ln.
Westminster House	163	Leased	No	103 efficiencies, 55 1bd, and 5 2bd units at 524 N. Charles St.
Woodland Gardens I	13	Leased	No	8 1 bd and 5 2bd units at 4755 Park Heights Ave (7 UFAS).
Total	3,896			

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

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

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

HABC periodically updates its Scattered Sites review as implementation moves forward and continues to use this approach to inform changes in MTW housing stock.

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

HABC continues to maintain its properties in the normal areas of unit renovations, envelop repair, concrete and paving repairs, and site improvements.

HABC plans to upgrade and replace electric meters and other equipment related to the automatic meter ready system to enhance the system reliability at several sites. These systems have been in place for a number of years and some components are approaching the end of their life expectancy, requiring replacement.

The replacement of the Cherry Hill electrical distribution system has been in the planning/design phase for several years and the design continues to be modified to reduce capital and ongoing costs. This continues to be dependent on Baltimore Gas and Electric, the local utility, to approve and coordinate construction. Negotiations continue but it is anticipated that work will begin in 2026. This is a very large, complex, and costly enterprise and will take multiple years to complete.

Table 5: Planned Capital Expenditures During the Plan Year

No.	Development Name	Description of Work	FY 2025 Planned Expenditures
1.	Latrobe Homes	Unit electrical raceway replacements, Storm water drain line repairs, and Electric meter replacement/upgrade of Automatic Meter Reading System (AMR)	\$ 1,225,000
2.	Poe Homes	Demolition	\$ 4,000,000
3.	Douglass Homes	Concrete sidewalk and curb repairs, Site erosion repairs	\$ 550,000
4.	Gilmor Homes	Exterior stair rail installation and/or replacement, Parking lot paving	\$ 630,000
5.	O'Donnell Heights	Emergency repairs	\$ 100,000

No.	Development Name	Description of Work	FY 2025 Planned Expenditures
6.	Cherry Hill Homes	Electric meter replacement/upgrade (AMR), Replacement of the electrical distribution system	\$4,350,000
7.	Brooklyn Homes	Electric meter replacement/upgrade (AMR)	\$ 227,500
8.	Scattered Sites	Roofing replacement, Window Replacement, and Vacancy renovations	\$ 1,900,000
9.	Authority Wide	Windows, Electrical, and Mechanical Work	\$ 1,550,000
10.	Authority Wide	Vacancy Renovations	\$ 1,000,000
11.	Authority Wide	Site Repairs/Improvements	\$ 3,000,000
TOTAL			\$18,532,500

Planned Capital Expenditures During the Plan Year

Below are the capital expenditures planned during the 2026 Fiscal year.

Infrastructure and Extraordinary Maintenance

Plans and negotiations with the local electrical utility, Baltimore Gas and Electric (BGE) regarding the replacement of the electrical distribution system for Cherry Hills continue and construction is anticipated to begin at some point in 2026. This is an extremely large, complex, and costly enterprise that will enhance the reliability of the distribution and supply of electricity to the residents of Cherry Hill. This effort will also impact any redevelopment efforts for Cherry Hill Homes and other nearby HABC owned properties.

Special Construction and Demolition/Disposition of Public Housing Units

The demolition of Poe Homes is anticipated to begin in the 4th quarter of 2025 and be completed in 2026. Plans are being made to demolish Oswego Mall, Shipley Hills, and the remaining units of O'Donnell Heights when relocation activities are completed. HUD approval of these demolitions is pending. These demolitions will take place in 2026.

504 Accessibility Improvements

HABC will continue to maintain existing UFAS/ADA compliant units to the extent they remain viable along with common areas and accessible routes to ensure compliance with UFAS and the 2010 ADA standards. Units continue to be modified to meet reasonable accommodation and immediate needs requests.

New UFAS units are being created as required in all newly developed properties and RAD converted properties.

Safety & Security Initiatives

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

Facilities & Real Estate

HABC continues to assess its facilities needs and renovates or improves as necessary across our Developments and Leased spaces.

Renovations of the HABC Office of Legal Affairs and the Engineering, Energy, Environmental, and Capital Programs areas of Benton Building are planned for construction in 2026. Architectural and construction plans are being developed for implementation in 2026.

Energy Performance Contracting & Resident Billing / Metering

HABC continues to monitor, measure, and verify work performed under the Phase 1 Energy Performance Contract (EPC 1). The construction phase of EPC 2 is complete and the monitoring, measuring, and verification of the work is beginning and will continue along with EPC 1.

The Energy Group addresses and manages the Resident Billing & Metering Program while HABC utilizes third-party utility billing to handle resident excessive consumption charges for EPC sites. The EPC 2 sites are in the implementation phase for assessing and billing excess utility charges. HABC has contracted a collection company to increase collection and compliance regarding excess utility consumption charges.

As mentioned under the Planned Capital Expenditure Section above, the existing automatic meter reading system (AMR) associated with the Excess Consumption Charge Program is being upgraded to enhance reliability and includes the replacement of meters and other equipment as necessary.

B. Leasing Information

i. Planned Number of Households Served

Table 6 provides information on the MTW households projected to be served by HABC as of the end of FY 2026.

Table 6: Planned Number of Households Served at the End of FY 2026

Planned Number of Households Served Through:	Planned Number of Units Months Occupied/Leased	Planned Number of Households to be Served
MTW Public Housing Units Leased	62,472	5,206
MTW Housing Choice Vouchers (HCV) Utilized*	198,264	16,522
MTW Thompson Housing Choice Vouchers**	51,732	4,311
Local, Non-Traditional: Tenant-Based	0	0
Local, Non-Traditional: Property-Based	3,376	281
Local, Non-Traditional: Homeownership	0	0
Planned Total Households Served	315,844	26,320

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

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

Table 7: Local, Non-Traditional Housing Programs

Local, Non-Traditional Category	MTW Activity Name/Number	Planned Number of Units Months Occupied/Leased	Planned Number of Households to Be Served
Tenant-Based	N/A	0	0
Property-Based	2025-01	3,376	281
Homeownership	N/A	0	0
Planned Households Served – Local, Non-Traditional Programs		3,376	281

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	There are no anticipated issues with leasing in 2026.
MTW Housing Choice Voucher	Unforeseen circumstances with funding projections for 2026 will require HABC to closely monitor its leasing projections to ensure utilization is maintained at the projected levels. Based on HUD's Two-Year-Tool, projections have HABC leasing 16,522 HCVs by 12/31/2026 (including SPVs). However, due to lower funding projections for 2026, HABC will need to closely monitor utilization to ensure the anticipated leasing schedule is maintained.
BRHP	BRHP is taking a conservative approach to leasing in 2026 due to current budget uncertainty. We are projecting to issue 170 new admission vouchers in the year and expect 153 of those to lease. We expect that attrition will lead to the loss of 197 households throughout the year, but with the new household leasing, we expect to end 2026 with a utilization over 98%. There are no anticipated leasing issues, as success rate continues to be over 90%.

C. Waiting List Information

i. Waiting List Information Anticipated

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

Table 9: Waiting List Information Anticipated

Waiting List Name	Description	Number of Households on Waiting List	Waiting List Open, Partially Open or Closed	Plans to Open the Waiting List During the Plan Year
Federal MTW Public Housing	Community Wide	25,056	Closed	No
Federal Public Housing-Mixed Population	RAD Waiting List	2,535	Closed	No
Federal MTW Housing Choice Voucher Units: Tenant-Based	Tenant-Based waiting lists opened in 2015 and 2023	24,818	Closed	No
Federal MTW Housing Choice Voucher Units: Project-Based	Project-Based waiting list	9,099	Closed	No
RAD Choice Mobility	RAD CM Waiting list	8	Open	Yes
Thompson Vouchers *	Program Specific	10,023	Closed	No

**The waiting list for Thompson PCD and Remedial Vouchers is maintained by BRHP and is separate from any other HABC waiting list. Application for, receipt of, or termination of a Thompson Voucher will not affect a family's standing on any other HABC waiting list.*

Describe any duplication of applicants across waiting lists:

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

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

Waiting List Name	Description of Planned Changes to the Waiting List
MTW Housing Choice Voucher Waiting List	HABC purged the PBV waiting list and has plans to open the list in late 2025. This MTW Plan will be completed prior to its opening. The PBV waiting list number will change by the time this Plan is approved.
MTW Public Housing Waiting List	No changes are anticipated in FY 2026 for the public housing Waiting List.
RAD Choice Mobility Waiting List	No changes are anticipated in FY 2026 for the RAD Choice Mobility Waiting List
Thompson Vouchers	BRHP is launching an applicant portal in June of 2025, and notice is being sent to the approximate 10,000 households on the waiting list notifying them of the requirement to register. BRHP anticipates that there will be a significant number of household who are unresponsive to the notices, and will therefore be dismissed from the waiting list. In 2026, BRHP will conduct an assessment of the remaining households to determine if the waitlist should be reopened in 2027.

III. Proposed MTW Activities

This section of the MTW Annual Plan provides information on new MTW activities proposed for FY 2026.

Activity #2026-01: Support for Statewide Rental Assistance Voucher Program

Activity Description

This activity is proposed to provide HABC with the flexibility to support the Maryland Statewide Rental Assistance Voucher Program (SVP) using MTW resources, as needed. The SVP is a state-funded program that, upon implementation, will provide temporary rental assistance to low-income families who are on the Housing Choice Voucher (HCV) waiting list and in need of housing assistance while awaiting the availability of a federal voucher. Funding for the SVP will be provided by the Maryland Department of Housing and Community Development (DHCD) and sub-contracted to participating Public Housing Authorities (PHAs) throughout the state to administer the SVP program.

If awarded by DHCD, HABC will primarily administer the SVP using the allocated state funding. However, through this activity HABC seeks the authority to allocate MTW funds, at its discretion, for purposes such as supplemental rental assistance payments, administrative support, housing navigation services, or other program-related activities that improve outcomes for low-income families and advance MTW statutory objectives.

The goal of the SVP is to provide temporary rental assistance to families while they wait to receive a HCV. Therefore, upon implementation of SVP, the amount of rental assistance received/paid on behalf of a family assisted under the SVP program will not be considered as income for the purposes of determining eligibility or calculating rent for the Federal HCV program; however, once selected for a Federal HCV, SVP households must relinquish their SVP voucher prior to be approved and issued a Federal HCV, and may not be receiving assistance through both programs simultaneously.

HABC will ensure that any MTW resources used in support of the SVP comply with the requirements outlined in PIH Notice 2011-45 (or any successor notice). If MTW funds are used to provide rental subsidies or services, HABC will ensure that such assistance is provided exclusively to low-income households (defined as households with incomes at or below 80% of Area Median Income), that units are in safe and sanitary condition, and that all applicable program and reporting requirements are met. HABC will also use future MTW Plans and Reports to track and report the amount and use of MTW funds and the number of households served, as applicable.

Statutory Objective(s)

This activity will support the MTW objectives of increasing housing choices for low-income families and assisting families to become economically self-sufficient.

Anticipated Timeline

In FY 2026, HABC will engage in internal planning, program design, and coordination with DHCD and other stakeholders to determine if MTW resources are needed to support the program and if so, the estimated need, the nature of the contribution, and estimated number of families to be supported by HABC MTW resources. At this time, no final decisions have been made regarding the level of MTW funding or the specific structure of HABC's financial participation. This activity is being proposed to establish the framework and authority for potential future support, subject to further analysis and HABC determination.

Anticipated Impact

The cost implications of this activity are currently undetermined, as the structure and level of HABC's support are still under development. Once determined, HABC will report on all planned MTW expenditures related to this activity in future MTW Plans and Reports. At this time, HABC anticipates having sufficient MTW resources to support the activity, if implemented.

Authorization(s)

MTW Agreement Attachment D, Broader Uses of Funds. HABC is seeking Attachment D flexibility in order to provide funding for housing developments targeted for low-income households that are not otherwise permitted under the Housing Choice Voucher and public housing programs established in Sections 8 and 9 of the US Housing Act of 1937.

IV. Approved MTW Activities

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

A. Implemented Activities

Activity #2006-01: Streamlined Admission & Recertification Process

(Formerly Multi-Year Recertifications)

Plan Year Approved, Implemented, Amended

- HCV Program: Two-year recertifications approved FY 2006 and implemented FY 2007. Three-year recertifications implemented FY 2014.
- Public Housing: Approved FY 2006 and implemented FY 2011. Placed on hold FY 2014 and reactivated FY 2016.
- HOTMA Related MTW Waivers: Approved 2024, Implemented TBD based on HUD guidance and readiness of HIP.
- Amended FY 2025 for using EIV at interims, BRHP transitions, and temporary decreases.

Description/Update

HABC is responsible for reexamination and verification of household income, household composition and other eligibility data. The following are the features of HABC's Streamlined Recertification Process activity.

Multi-Year Recertifications: HABC will conduct a reexamination of household income and composition for all Public Housing and HCV families once every 24 months except under the circumstances outlined below:

- Triennial Recertification
 - PH Families on Flat Rent (with annual updates to verify family composition).
 - PH and HCV Families with 100% Fixed Income.
- Annual Recertification
 - PH families reporting zero income or minimal income. Minimal income is defined as less than \$2,400 in household gross income annually.
 - Residents living in Mod Rehab and Mod Rehab SRO units.
 - Residents with other vouchers which do not qualify based on HUD funding restrictions.
 - Residents with Homeownership vouchers.
 - Residents with HUD Awarded Special vouchers, unless approved by HUD for application of MTW policy.

- ➔ In FY 2026, HABC is proposing that HCV families who are reporting zero income or minimal income will have a reexamination of household income and composition annually.

Limit on Interim Recertifications: In FY 2020, HABC was approved to limit the number of voluntary interim recertifications between regular recertifications for HCV program participants. In 2024, the limit on interim recertifications was applied to the Public Housing Program.

- ➔ In FY 2026, HABC is proposing to remove the limit on interim recertifications for both the HCV and Public Housing programs. The hardship policy for the limit on interim recertifications will therefore be removed.

Interim Recertification within 120 days of Scheduled Reexamination: When a family requests an interim reexamination within 120 days of a scheduled reexamination, HABC will conduct a full reexamination, at the time of the interim request, which will initiate a change to the date of the family's regular reexamination schedule.

Reporting Increases in Income Between Regular Recertifications: As an alternative to the HOTMA provision regarding required interim recertifications for applicable increases in income, increases in income between regular recertifications do not need to be reported until the next regular recertification. Exceptions to this requirement include required reporting of increases in income between regular recertifications for families reporting zero income.

- ➔ In FY 2026, HABC is proposing that for Public Housing and HCV families, in addition to zero income families, families in which any adult family member is reporting zero income or minimal income must report increases in income between regular recertifications.

Rent Increase Effective Dates: As an alternative to the HOTMA provision regarding rent increase effective dates for interim recertification, if a required change is reported late, the increase will be retroactive to the date it would have been effective had the information been provided on a timely basis.

Substantial Difference: HABC has established \$5,000 as the threshold for a substantial difference between verification sources and for use in reconciling EIV/IVT discrepancies. HABC will retain the right to request additional verification information and use any other verification method in priority order to reconcile any substantial differences.

Age of Verification Documents: Documents, when received by HABC, may not be more than 120 days old. In addition to that policy, HABC will use verification documents that have been received within 120 days prior to voucher issuance. To ensure that families are income eligible at HCV lease-up, HABC will require that families self-certify that income used to determine program eligibility and affordability has not changed since their initial income determination was made.

Alternative Verification Hierarchy: HABC utilizes an alternative, streamlined method to verify household member income for all Public Housing applicants and residents and HCV program applicants and participants (including both tenant-based and project-based programs). The table below illustrates HABC's proposed change to the verification hierarchy.

Level	Verification Technique	Ranking
1	Upfront Income Verification using HUD's EIV & IVT	Highest (Mandatory)
2	Upfront Income Verification using non-HUD system	Highest (Optional)
3	Written Third Party Verification Or Written Third Party Verification Form Or Oral Third Party Verification	High (Mandatory) <ul style="list-style-type: none"> • Supplements EIV and UIV • Also used for: <ul style="list-style-type: none"> ○ Non-EIV/UIV reported income sources ○ Disputes of EIV reported information
4	Self-Certification	High (Optional) <ul style="list-style-type: none"> • To supplement EIV when EIV reported sources do not contain verification • When tenant cannot produce written third-party verification documents. • May not be used to verify: <ul style="list-style-type: none"> ○ SS/SSO ○ Public Assistance ○ Unemployment ○ VA Pension ○ Court-Ordered Child Support ○ Worker's Compensation ○ Full-time Student Status

VASH & EHV Vouchers: HABC has received HUD approval to apply the MTW flexibilities under this Streamlined Recertification activity to families with VASH and EHV vouchers.

Minimal Income: HABC defines minimal income as less than \$2,400 per year for the Public Housing program.

BRHP Transition Households: HABC will apply its MTW HCV related policies covered in this activity to the 375 BRHP vouchers which are transitioning to HABC.

Planned Non-Significant Changes

For FY 2026, HABC proposes the following updates to this activity:

- Reporting Increases in Income Between Regular Recertifications:
 - For Public Housing and HCV families, any adult reporting zero income or minimal income (as defined above) must report increases in income between regular recertifications.

- Multi-Year Recertifications:
 - HCV families reporting zero income or minimal income will have a reexamination of household income and composition annually.
- Limit on Interim Recertifications:
 - HABC will no longer limit interims between regular recertifications.
 - The hardship policy related to this policy will also be removed.

Planned Significant Changes

No significant changes are planned for FY 2026.

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.
- Amendments to PB HAP Contracts for Target Populations: Approved FY 2019.
- Waiver of the Independent Entity requirement: Approved in FY 2020 and implemented in FY 2020.
- Definition of a PBV Project: Approved and implemented in FY 2022.

Description/Update

HABC operates a PB component under its Housing Choice Voucher Program. Through its PB voucher program, HABC partners with for-profit and nonprofit housing providers to expand the supply of affordable housing to low-income families. To meet the evolving needs of the agency and the participants served, HABC has enhanced and expanded its existing PB program to include the components outlined below. The Enhanced PB Program components apply to all PB units, including, but not limited to the Thompson PB units, Bailey LTA and PB units, the non-Bailey LTA PB units and PB units owned directly or indirectly by HABC. HABC applies its MTW PBV policy to RAD developments. Additionally, except where superseded by RAD program rules, HABC applies its Streamlined Admission and Recertification Process, Modified Reasonable Rent & Rent Cap and Rent Simplification activity policies to RAD developments.

- **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 may allow for floating units instead of identifying specific units in the HAP contract in the PB program.
- **Amendments to PB HAP Contracts:** Using its MTW authority, HABC has waived the three- year restriction on amending HAP contracts. HABC may amend the HAP contract at any time during the initial term of the HAP contract and during any renewal term of the HAP contract. HABC may exercise this option for all PBV units, including, but not limited to the Bailey LTA and PB units and the non-Bailey LTA PB units.
- **Independent Entity Requirement:** HABC has waived the requirement for Independent Entities to approve AHAP/HAP Contracts, renewal terms, rent determinations and inspections of HABC owned properties.

➔ For FY 2026, HABC proposes to also waive independent entity requirements for the following additional functions for HABC-owned properties: project selection process, review of evidence of completion of rehabilitation or construction, and determination of substantial improvement for existing housing.

- **Modified Rent Reasonableness:** As referenced in Activity 2020-04: Modified Rent Reasonableness and Rent Cap Policy, HABC will utilize the flexibility in this activity to determine rent reasonableness for PBV units and will also apply the flexibility to utilize payment standards up to 135% of FMR when determining initial and re-determined rents for PBV units located in opportunity areas. Finally, the flexibility in Activity 2020-04 regarding rent caps will also apply to rent increases for PBV units.
- **Definition of a PBV Project:** HABC will define a PBV project as a single building, multiple contiguous or non-contiguous (scattered sites) buildings, or multiple buildings on contiguous or non-contiguous parcels of land all with a single owner. A single-family building is a building with no more than four dwelling units. Additionally, HABC may elect to combine units that cumulatively meet the definition of a PBV project, but that are covered under more than one Housing Assistance Payments (HAP) Contract, into a single HAP Contract. For such scattered site projects, HABC implements an alternative method to determine rent reasonableness whereby HABC bases the rent reasonableness determination for all units in the project that are within the same submarket area on the rent reasonableness determination made for a single unit of each bedroom size. For example, the rent reasonableness determination for all one-bedroom units in the project will be based on the rent reasonableness determination made for a single one-bedroom unit in the project provided that the units are in the same submarket area.

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

- Subject to funding availability, owners may obtain applicants directly from the Mayor's Office of Homeless Services (MOHS) or other designated service providers for the chronically homeless and veterans or other such targeted population and refer such applicants to HABC to determine eligibility for receiving a voucher subsidy. All referrals will be placed on a waiting list maintained by HABC. Including the Homeless limited preference vouchers, HABC has 230 project-based vouchers designated for homeless individuals. Additionally, by the end of FY 2026 HABC anticipates that there will be 19 PBV units under contract for homeless veterans.
- Owners are required to maintain the designated unit for the term of the PBV HAP contract. In the event the owner fails to lease a designated unit to an approved applicant, such failure will be considered a default under the PBV HAP Contract. If the default is not cured within 60 calendar days, HABC can remove the unit from the HAP contract, or recapture the amount of HAP paid for the period of time the tenant was occupying such unit in violation of the terms of the PBV HAP contract.

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

In FY 2026 HABC anticipates that 308 new PBV units will be placed under AHAP or HAP representing 10 PBV projects. In total, by the end of FY 2026, HABC anticipates that there will be a total of 4,204 PBV units under AHAP or HAP.

Planned Non-Significant Changes

For FY 2026, HABC proposes to modify this activity to also waive independent entity requirements for the following additional functions:

- Project selection process (24 CFR § 983.51)
- Review of evidence of completion of rehabilitation or construction (24 CFR § 983.57(b)(3))
- Determination of substantial improvement for existing housing (24 CFR § 983.57(b)(4))

Planned Significant Changes

No significant changes are planned for FY 2026.

Activity #2006-03: Thompson Streamlined Admission & Recertification Process (Formerly Thompson Biennial Recertifications)

Plan Year Approved, Implemented, Amended

- Biennial Recertifications approved FY 2006 and implemented FY 2007
- Increases Between Recerts approved FY 2025 and implemented in FY 2025

Description/Update

Pursuant to HABC's MTW authority, families participating in the Baltimore Housing Mobility Program as administered by the Baltimore Regional Housing Partnership (BRHP) will have their household composition and income re-determined at least once every 25 months. BRHP's current policy allows residents to request an interim change at any point during the recertification cycle for loss of income and HABC has no plans to change the policy. Additionally, the threshold for the age of documents received by BRHP has been extended from 60 days to 120 days.

Reporting Increases in Income Between Regular Recertifications: As an alternative to the HOMTA provision regarding required interim recertifications for applicable increases in income, BRHP will not conduct interim recertifications for increases in income between regular recertifications. Exceptions to this requirement include required reporting of increases in income between regular recertifications for families reporting zero income or who have less than \$2,400 in income. BRHP feels that this policy provides greater opportunity for economic self-sufficiency for the family.

Special Purpose Vouchers

Not applicable

Planned Non-Significant Changes

For FY 2026, HABC proposes the following updates to this activity:

- BRHP will process an interim and increase the family share of rent when the family's sole recorded income consists of non-wage assistance, such as monthly gifts from family members, and they are reporting newly received wage income.
- BRHP will transition to a tiered recertification schedule in 2026. Households will complete the recertification process biennially unless they meet one of the conditions listed below:
 - Households with 100% fixed incomes will be recertified every 3 years
 - Households with an annual income of less than \$2,400 will be recertified annually.

Planned Significant Changes

There are no significant changes planned for FY 2026.

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 and FY 2024.

Description/Update

HABC has established a combined Public Housing and HCV Family Self Sufficiency (FSS) Program. The FSS Program currently provides services to over 300 Public Housing and Housing Choice Voucher Program families. This MTW FSS program activity provides HABC with greater flexibility in designing an FSS Program that is responsive to the needs of its participating families. Specifically, HABC encourages families to enroll and maintain participation in FSS through the use of goal incentives. These goal incentives award families for reaching interim goals such as completing education and training programs, opening bank accounts and participating in budget and financial management workshops. Other features of the MTW FSS Program include:

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

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

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

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.

In FY 2024, the following modifications were made to the FSS program. These modifications were designed to increase administrative efficiency and to enhance resident self-sufficiency.

Contract of Participation: HABC has modified its MTW version of the Contract of Participation (CoP) to reflect its MTW policies as well as to update applicable FSS final rule provisions. HABC provides existing

FSS participants, who had CoPs in place when HABC implemented the final rule changes, the option to convert to the FSS Final Rule and sign a new CoP or retain their existing CoP. This determination was required to be made by December 31, 2024. Thereafter, their pre-final rule CoP contracts stand through the remainder of their participation. This modification has been fully implemented—all existing residents as of 12/31/2024 have either chosen to convert their CoP or retain the existing contract, and all residents enrolling in FSS after January 1, 2025, have been and will continue to be enrolled with a final rule CoP.

Term of the CoP: HABC utilizes a five-year term on all FSS CoPs, with the effective date of the CoP as the first day of the month following the date the contract is executed. The expiration date will be five years from the effective date of the CoP. All new FSS participants as well as existing participants who convert to the Final Rule contract will be subject to the MTW term of the CoP. As of FY2025 this term has been implemented for all new FSS participants as well as existing participants who have converted to the Final Rule contract.

Revised Escrow Model: In order to encourage families of all income levels to participate in the FSS program, HABC has established an escrow model in which the monthly escrow amount is determined by the family's annual earned income, rather than the change in their Total Tenant Payment (TTP). As shown in the table below, the family will receive escrow according to income tiers; the family must earn at least \$14,500 in order to begin escrowing savings.

If the family's earned income decreases below \$14,500 during their participation, they will no longer receive escrow. However, if the family's earned income later increases and meets or exceeds \$14,500, they will again receive escrow. HABC may make modifications to factors in the revised escrow model such as earned income bands and escrow amount in future fiscal years in order to meet FSS program objectives and economic and budget conditions.

All new FSS participants and existing FSS participants who are not accruing escrow when the tiered escrow program is implemented will be required to use the income tier escrow model. Existing FSS participants who are accruing escrow when the tiered escrow program is implemented will be able to stay with their existing escrow model or change to the tiered escrow model at their next regular or interim recertification.

Tiered Income & Escrow Table

Annual Earned Income min	Annual Earned Income max	Escrow Amount
\$0	\$14,499	\$0
\$14,500	\$17,999	\$50
\$18,000	\$21,499	\$75
\$21,500	\$24,999	\$100
\$25,000	\$28,499	\$125
\$28,500	\$31,999	\$150
\$32,000	\$35,499	\$175
\$35,500	\$38,999	\$200
\$39,000	\$42,499	\$225
\$42,500	\$45,999	\$250

Annual Earned Income min	Annual Earned Income max	Escrow Amount
\$46,000	\$49,499	\$275
\$49,500	\$52,999	\$300
\$53,000	\$56,499	\$325
\$56,500	\$59,999	\$350
\$60,000	\$63,499	\$375
\$63,500	\$66,999	\$400
\$67,000	\$70,499	\$425
\$70,500	\$73,999	\$450
\$74,000	\$77,499	\$475
\$77,500	and up	\$500

The software programming needed to implement the Tiered Income escrow model and related training were completed in FY 2025. HABC anticipates that the revised escrow model will be fully implemented before the close of FY 2025.

Coordination with GROW Program: Non-exempt public housing residents who are not working or enrolled in an education/job training program and who are under an FSS Contract of Participation when the GROW program is implemented, will have their FSS CoP timeline updated on employment/job training/education to reflect the GROW program requirements. Additionally, non-exempt public housing residents who are not working or enrolled in an education/job training program may join FSS as part of their GROW program EDP; however, their FSS CoP timeline for employment/education/job training will reflect the GROW program requirements.

Planned Non-Significant Changes

As part of the ongoing coordination with the GROW program, residents who are eligible for GROW (non-exempt public housing residents who are not working or enrolled in an education or job training program) will be required to comply with the GROW program requirements before enrolling in FSS.

Planned Significant Changes

No significant changes are planned for FY 2026.

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

Plan Year Approved, Implemented, Amended

- Exception Payment Standards: Approved and implemented FY 2007.
- Security Deposit Assistance: Approved and implemented FY 2022.
- Incentive Payments to Landlords: Approved FY 2019 and implemented FY 2022.
- Pre & Post Purchase Counseling Fees: Approved FY 2019 and implemented FY 2023.

Description/Update

Payment Standards for the Thompson Mobility Program will be set between 90 and 135 percent of the Local 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 \$0 and \$500 dollars, which will be adjusted seasonally to encourage leasing in summer months.

BRHP also provides assistance to Mobility Program participants to include incentive payments to landlords, 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. BRHP may provide these incentive payments more than once to accommodate participant mobility needs and objectives. Such accommodations include but are not limited to additional moves related to HQS failure, emergencies, employment and moves to a higher opportunity area. BRHP will evaluate each move on a case-by-case basis to determine if the move warrants an additional payment of application fees and moving costs.

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 and, as such, no hardship provisions are required.

Planned Non-Significant Changes

BRHP will change the tenant contribution range from \$0 to \$500 in order to incentivize lease up and to encourage leasing in summer months.

Planned Significant Changes

No significant changes are planned for FY 2026.

Activity #2009-01: MTW Homeownership Program

Plan Year Approved, Implemented, Amended

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

- Activity #2009-01 which established the MTW Scattered Site Homeownership Program was approved in FY 2009, placed on hold in FY 2014, and reactivated and amended in FY 2020 and FY 2021. Original implementation was 2009.
- Activity #2021-02 was approved and implemented in FY 2021.
- Activity amended in FY 2025.

Description/Update

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

Eligible Purchasers – Eligible purchasers include public housing residents, HCV Program voucher holders, and applicants on the public housing and/or HCV waiting lists. Eligibility for non-disabled, elderly households and households where the only source of income is from a pension will include annual incomes equal to or greater than the Federal SSI benefit for an individual living alone (or paying his or her share of food and housing costs) multiplied by twelve. HABC will establish priority tiers that identify the priority order of selection and may establish a waiting list including selection criteria if needed based on demand.

Eligible Properties – HABC scattered site properties are eligible for purchase under this program. The determination of which properties are eligible for homeownership will be made solely by HABC based on its assessment of the best interests of the community and the agency. In FY 2023 Annual Plan, HABC modified the eligible properties to include units developed in partnership with a developer where certain numbers of units are set aside for families in HABC's Homeownership program.

Property Feasibility – HABC limits the scope of repairs and renovations of units disposed of directly by HABC to eligible purchasers to \$75,000 per unit, which may be increased by HABC to accommodate renovations related to disability accessibility or rehabilitation of properties within historic districts. Notwithstanding this limit, the rehabilitation costs cannot be more than one-third of the appraised value after rehab.

Second Mortgages – Subject to funding availability, HABC may offer non-cash, non-interest bearing second mortgages to eligible homebuyers up to 25% of the after-rehab appraised value of the property,

which may be increased to up to 50% on a case-by-case basis or in extenuating circumstances. HABC second mortgage assistance may be made only after eligible homebuyers have obtained a first mortgage commitment for at least 75% of the sales price. HABC requires that second mortgages be paid back in full during or after the first mortgage has been paid in full, if the property or any part of the land thereof is refinanced, or if ownership is transferred or sold.

Closing Costs – HABC may match the buyer’s personal contribution towards the purchase of a Scattered Site Property up to \$5,000 to be applied at closing. Buyers may not use a credit card to make their personal contribution. All closing costs will be based on need and only apply after required personal contribution, government and/or lender assistance have been applied. Additionally, this grant is only available to residents who purchase their scattered site unit from HABC.

Down Payment/Closing Cost Assistance: Subject to funding availability, HABC may offer a one-time down-payment or closing cost assistance up to \$10,000 for eligible Public Housing first time homebuyers in HABC’s HOMEBuyer Readiness Training Program. Families will be required to attend homeownership counseling and provide counseling certificates from one of the HABC approved HUD certified Housing Counseling Agencies. The property purchased must be in Baltimore City/County and the property must pass a lead test and Housing Quality Standard (HQS) inspection. HABC will establish criteria and guidelines to determine the amount awarded. HABC will not require the funds to be refunded unless the family is unable to obtain a mortgage to purchase a home in Baltimore City/County that meets the program eligibility requirements, or the family fails to submit required program documentation. The down payment/closing cost assistance paid directly to the title company. Funding is to be applied directly as down payment or applied to the closing cost. Funds provided are based on needs and where applicable, excess funds will be required to be returned to the Housing Authority of Baltimore City.

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

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

Decelerated Assistance – To ease the transition from subsidized homeownership assistance, HABC has a schedule of decelerated assistance for an additional five years at the end of the family’s applicable HCV Homeownership assistance term. Families enrolled in the Deceleration Assistance Program are eligible for the 60-day hardship and no-fault hardship supports but are not eligible for HABC’s extended hardship

options. Decelerated assistance is available to participants with HCV Homeownership Vouchers as well as participants with Special Homeownership Vouchers. The decelerated assistance schedule is as follows:

- Participant pays 30% of their monthly household income plus:
- Year 1: 50% of the balance of the mortgage payment;
- Year 2: 60% of the balance of the mortgage payment;
- Year 3: 70% of the balance of the mortgage payment;
- Year 4: 80% of the balance of the mortgage payment; and
- Year 5: 90% of the balance of the mortgage payment. At the end of the 5th year, the family will be responsible for 100% of the mortgage payment.

Special Homeownership Vouchers

As part of the MTW Homeownership Program, HABC utilizes MTW flexibility to create and fund a limited number of Special Homeownership Vouchers (SHV) for use by eligible low-income households who purchase a scattered site unit, a property from authorized Purchase and Resale Entities, or a home in the Baltimore City housing market. SHVs differ from regular Housing Choice Voucher (HCV) Program vouchers in the following respects:

Eligibility – Eligibility for SHVs is limited to low-income households participating in and meeting the income and other criteria of HABC’s MTW Homeownership Program who purchase a scattered site unit from HABC or its authorized Purchase and Resale Entities. Households receiving an SHV are not eligible for a second mortgage through the MTW Homeownership Program. Eligibility for non-disabled, elderly households and households where the only source of income is from a pension will include annual incomes equal to or greater than the Federal SSI benefit for an individual living alone (or paying his or her share of food and housing costs) multiplied by twelve.

HABC will consider providing Special Homeownership Vouchers to eligible, existing Public Housing families and Public Housing and Housing Choice Voucher program families on the waiting list who purchase homes on the general market. This change will effectively allow Public Housing families with the opportunity to choose and purchase an eligible home under the Homeownership program which is outside of HABC’s scattered site inventory.

Eligible Units – SHVs may be used in conjunction with the purchase of an HABC scattered site unit offered through HABC’s MTW Homeownership Program. Special Homeownership Vouchers (SHV) may also be used for units developed in partnership with a developer and HABC that require a certain number of set-aside units for families in HABC’s Homeownership program as well as properties purchased in Baltimore City’s housing market.

Portability and Moves – SHVs are not portable and cannot be used to move to another homeownership or rental unit. The SHV assistance will end if the originally purchased scattered site unit or property purchased in Baltimore City’s housing market, 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 or former Public Housing head's of household whose homeownership assistance has terminated may be eligible to transfer to an available public housing unit.

Utility Allowances – SHV participants are eligible for utility allowances; however, they are not eligible for utility allowances payments (UAPs).

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

Rent/Mortgage Burden – HABC will establish a rent burden of 40% for households that are at or over 50% of Area Median Income and 35% for families under 50% of the Area Median Income. The rent burden is necessary to meet the established 30% household contribution and the granting of utility allowances.

Term of Homeownership Assistance – If an elderly or disabled family chooses to move, with continued homeownership assistance, for any reason outside of applicable disability needs, HABC will apply a term limit for assistance. The term of assistance will be equal to the term of their new mortgage.

Payment Shock Requirements – To ensure family success in the Homeownership program, HABC will institute additional mortgage requirements. Specifically, a family's initial payment portion of their mortgage may not be more than 1.5 times their current TTP. This requirement applies to all homeownership families with the exception of families where the head of household graduated from college or received a certification from a certified trade school within the past 12 months. In cases of recent graduates, the tenant's portion cannot exceed 40% of their adjusted monthly income.

Reinstatement – Where a homeownership family was terminated 180 calendar days after the last housing assistance payment, HABC will consider reinstatement for non-disabled households within the first year of termination and disabled households within two years of termination. To be eligible for reinstatement, the family must be current on their mortgage, have not refinanced their mortgage with unfavorable terms or refinanced with a Home Equity Line of Credit (HELOC), withdrawn equity from the home beyond necessary to cover the expense of needed non-cosmetic repairs, or be facing foreclosure.

Additionally, the family must meet all eligibility requirements for the Housing Choice Voucher and Homeownership programs. Reinstatement may also be considered for a disabled household, (whose program participation was ended due to the 180 Homeownership Assistance Payment rule) and who was previously employed and experienced a significant decline in income due to their disability caused inability to work.

Additional Homeownership Program Features

As part of HABC's efforts to identify and provide additional homeownership opportunities and to assist potential home buyers in becoming successful homeowners, HABC has undertaken the following:

Homebuyer Readiness Training Program – HABC developed a Homebuyer Readiness Training Program where assistance is provided to families to assist them in eliminating the obstacles that prevent them from achieving homeownership. The program is available to both public housing and HCV families. All

participants are required to enroll and complete the Homebuyer Readiness Training Program to receive any homeownership assistance from HABC including closing cost assistance or to purchase an HABC owned property or a property from an authorized Presale/Resale Entity.

Additional Homeownership Units:

- HABC works with Habitat for Humanity to purchase HABC owned vacant lots to create homeownership units and subsequently sell a set number of units to qualified HABC homeownership families. In August 2023, HABC and Habitat executed the First Amendment to Contract of Sale and an Addendum to Contract of Sale for 28 lots. These amendments extend the term of the contract and include language that allows existing Housing Choice Voucher holders priority to purchase at least nine of the newly constructed units. In October 2023, four of these HABC-owned lots, in the former Claremont Homes site (now known as the Orchard Ridge homeownership lots), were sold to Habitat for Humanity of the Chesapeake to be developed as homeownership units. In March 2025, Habitat for Humanity of the Chesapeake purchased the final 10 HABC-owned lots. Shortly thereafter, in June 2025, Habitat for Humanities hosted the groundbreaking ceremony for this project. Nine (9) of the 27 units are under construction with a proposed delivery date in fall 2025. The project is one of the first in the State to receive \$1M of UPLIFT funds from the State of Maryland. UPLIFT is a new initiative geared toward affordable homeownership projects. Once completed, at least five (5) eligible HABC families will be offered an opportunity to purchase one of these homes.
- In September 2023 HABC made an award to a qualified developer for development of the 2100 Block of North Calvert Street. HABC and the developer are working out the terms of the Masters Development Agreement (MDA). Fourteen HABC-owned, along with two lots owned by the City of Baltimore will be sold to the developer who will create 16 homeownership units, of which five will be affordable to households with incomes at or below 80% of area median income. It is HABC's intention to include language in the MDA to ensure that existing Housing Choice Voucher holders will be given first priority to purchase an affordable housing unit. The MDA between HABC and the joint venture developer, North Calvert JV, LLC was executed in December 2024, and the project is now in the predevelopment phase. The developer has contracted with local architecture and civil engineering firms, whilst working on securing all financial obligations for the project which has a preliminary budget of \$ 6.5M. HABC will continue to work with the developer's legal team to work through any challenges associated with the title and transfer of the HABC-owned lots. In July 2025, the City executed the Right of Entry agreement with the developer further allowing the developer to perform other due diligence matters. Progress meetings for this project will resume in late August between the developer and HABC with the goal of completing a financial closing in the first quarter of 2026.

Planned Non-Significant Changes

HABC plans to make the following non-significant changes for FY 2026:

- *Down Payment/Closing Cost Assistance:* Excess funds will be required to be applied as a principal curtailment or returned to the Housing Authority of Baltimore City. Currently, participants of the

Special Homeownership Voucher or the Housing Choice Homeownership Voucher are not eligible to participate.

- *Eligibility:* A Special Homeownership Voucher waiting list will be established. The waiting list will be prioritized primarily for eligible, existing Public Housing families. The second priority for the waiting list will include eligible Public Housing applicants currently on the Public Housing waiting list and HCV applicants currently listed on the HCV waiting list.
- *Rent/Mortgage Burden:* HABC will establish a rent burden of 40% for households that are at or over 50% of Area Median Income and 35% for families under 50% of the Area Median Income. The rent burden is necessary to meet the established 30% household contribution and the granting of utility allowances.
- *Homebuyer Readiness Training Program:* All participants are required to enroll and complete the Homebuyer Readiness Training Program to receive any homeownership assistance from HABC including closing cost assistance or to purchase HABC owned properties, or to purchase properties from an authorized Presale/Resale entity.
- *Reinstatement:* HABC will consider reinstating families terminated after the final HAP as long as the family is current on their mortgage and have not refinanced with a Home Equity Line of Credit (HELOC) or withdrawn equity from the home beyond an amount necessary to cover the expense of needed non-cosmetic repairs – in addition to other eligibility criteria.
- *Eligible Housing Units:* HABC will allow properties purchased in Baltimore City's housing market as eligible for the Special Homeownership Vouchers. Properties purchased from authorized Purchase and Resale Entities are also allowed.
- *Decelerated Assistance:* Families enrolled in the Deceleration Assistance Program are not eligible for HABC's extended hardship programs but are eligible for 60 day hardship and no fault hardship supports.
- *Closing Costs* – The buyer's personal contribution toward an eligible property must not be purchased using a credit card.

Planned Significant Changes

No significant changes are planned for FY 2026.

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 for FY 2026.

Planned Significant Changes

No significant changes are planned for FY 2026.

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.

HABC has 2 LTA NED units remaining to complete its Bailey Consent Decree obligation for the 100 LTA NED units.

Planned Non-Significant Changes

Previous Plans and Reports reported 280 PBV Bailey LTA NED units, however, this included all LTA and LTA NED units, even some not executed under the Bailey commitment. In FY2025, HABC reconciled the reporting of Bailey LTA NEDs to confirm that only 100 vouchers were committed and all 100 are expected to be fully executed in 2026.

Planned Significant Changes

No significant changes are planned.

Activity #2012-01: Rent Simplification – Thompson

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

Plan Year Approved, Implemented, Amended

- Adjusted Income and Asset Income: Approved and implemented FY 2012.
- FT Student and Adoption Assistance Exclusion: Approved and implemented FY 2014.
- Asset & Seasonal Income Calculation: Approved and implemented in FY 2020.
- Income Calculation Changes: Approved FY 2024 and implemented FY 2024.

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:

- **Income Calculation:** BRHP will calculate annual income by adding the income the family expects to receive during the 12-month period following the family's admission or regular reexamination effective date. Accordingly, annual income is calculated by projecting current income forward for a 12-month period.
 - This method of income calculation will be used for new admissions, regular and interim reexaminations. Exceptions to this policy include but are not limited to families with seasonal income. For these families retrospective income will be used.
 - If an estimate can be made for those families whose income fluctuates from month to month by income averaging, this estimate will be used so that the housing payment will not change from month to month.
 - If there are bonuses or overtime, which the employer cannot anticipate for the next twelve months, bonuses and overtime received the previous year will be used.
- **Seasonal Income:** BRHP calculates seasonal income using the past four quarters of income as reported by Enterprise Income Verification's (EIV) Income Report, tax returns or other applicable third-party methods of verification. Income may also include off-season employment and/or unemployment.
- **Modified Deductions:** The gross annual income is reduced using the standard deductions outlined below. There will be a standard deduction for working families, elderly families, disabled families and non-disabled families without wages. The deductions below replace all other regulatory deductions. The deductions are:
 - \$4,500 for households with wages
 - \$1,700 for households without wages

- \$525 for any elderly or disabled family (to be combined with either of the above deductions). BRHP will update this deduction annually for consistency with the CPI for urban wage earners and clerical workers, rounded to the next lowest multiple of \$25.
- **Income Exclusions:**
 - 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.
 - Guaranteed Income Exclusion: BRHP excludes 100% of income received from HABC reviewed and approved guaranteed income programs which is paid to support financial stability and economic equality. This income is temporary and thus excluded.
- **Assets**
 - Asset Income Exclusion and Self-Certification: HABC excludes all income from assets when the cash value of the asset is less than \$50,000. Additionally, for households where the cash value of the assets is less than \$50,000, BRHP allows self-certification of asset value and income.
 - Asset Income Calculation: BRHP calculates asset income by taking the market/face value of the family's assets and multiplying that value by the established passbook savings rate when the market/face value of the family's assets is in excess of \$50,000.
- **Change in Family Composition:** BRHP updates the voucher size and payment standard at the certification when family composition changes are reported.
- **Payment Standards**
 - When the payment standard goes down between the date the RFTA is submitted and the lease effective date, BRHP will apply the higher payment standard in effect when the RFTA was submitted. This policy will apply to leasing for new admissions and moves. Additionally, BRHP updates the voucher size and payment standard at the certification when family composition changes are reported.
 - When there is a contract rent increase between regular recertifications, BRHP will update the payment standard at the interim recertification only if the payment standard has increased. BRHP does not decrease payment standards for occupied units.
- **Hardship:** BRHP's hardship policy is extended so that families may request the use of regulatory deductions and exclusions if adjusted income would be lower than adjusted income calculated using BRHP standard deductions. The request must be made within 14 calendar days of the notification of the change in family rent share. HABC will apply its financial hardship policies to households who demonstrate hardship due to application of these policies.

Planned Non-Significant Changes

BRHP will update the standard deduction using the CPI for urban wage earners and clerical workers, rounded to the next lowest multiple of \$25. This will result in 2026 deductions being the following:

- \$4,725 for households with wages
 - \$1,775 for households without wages
 - \$550 for any elderly or disabled family

Planned Significant Changes

No significant changes are planned for FY 2026.

Activity #2014-01: HABC Long–Term Affordable Project-Based Voucher Contract Plan Year Approved, Implemented, Amended

Approved and implemented FY 2014.

Description/Update

In FY 2014, HABC established the Long-Term Affordable Project Based Program (LTA-PB Program). Under this Program, HABC created long-term affordable project-based units at newly constructed or redeveloped sites where the source of funding for housing assistance is project-based vouchers.

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

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

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

Currently, five PBV developments have LTA units which are leased:

- O’Donnell Heights: 23 units
- 1234 McElderry: 50 units
- Somerset 3 (The Ruby): 21 units
- Perkins 2A: 50 units
- Perkins 2B: 26 units

By the end of FY 2026, 170 LTA units will be completed and leased.

In 2024, there was one additional contract under AHAP which included LTA units, and it is anticipated that HAP contract will be in place for the project by the end of 2027.

- Somerset 4: 66 units

Planned Non-Significant Changes

In FY 2024 HABC planned to have an AHAP executed for 66 units at Somerset 4 but due to delays in financial closing, the AHAP is postponed to 2027.

Planned Significant Changes

No significant changes are planned for FY 2026.

Activity #2019-01: Rent Simplification

Plan Year Approved, Implemented, Amended

Approved & Implemented FY 2019, Amended FY 2020 & FY 2024

Description/Update

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

- *Exclusion of all FT Student Earned Income:* Under Rent Simplification, HABC excludes all full-time student earned income for adult full-time students, other than the head of household, co-head and spouse. HABC will continue to apply a dependent deduction to adult full-time students. Additionally, as HABC is excluding 100% of earned income for adult full-time students, HABC will only verify full-time student status; however, HABC will not conduct verification of full-time student earned income.
- *Exclusion of all Adoption Assistance Payments:* HABC will exclude 100% of the income received for adoption assistance payments. The current threshold for inclusion of adoption assistance payments is \$480. This change will result in improved administrative efficiency and further assist households with economic self-sufficiency.
- *Guaranteed Income Exclusion:* HABC excludes 100% of income received from HABC reviewed and approved guaranteed income programs which is paid to support financial stability and economic equality. This income is temporary and thus excluded.
- *Self-Certification of Asset Value and Income and Exclusion of Asset Income:* HABC established \$50,000 (market/face value) 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. Self-certification of assets valued at \$50,000 or less will be accepted at admission and at all certifications thereafter.
- *Asset Income Calculation:* When the market/face value of a family's assets is in excess of \$50,000, HABC will calculate asset income by taking the market/face value of the family's assets and multiplying that value by the established passbook savings.
- *Medical Expense Calculation Method:* HABC calculates medical expenses for eligible participants using past paid, unreimbursed expenses in addition to prospective medical insurance premiums. Over the counter medications will not qualify for a deduction unless accompanied by a prescription and paid receipts. This change will alleviate the need to try to determine anticipated medical procedures and expenses, which cannot be accurately forecasted; however, there is no change to the amount and type of medical expenses which can be deducted.
- *Seasonal Income Calculation Method:* HABC calculates seasonal income using the past four quarters of income as reported by the Enterprise Income Verification's (EIV) Income Report, tax

returns or other applicable third-party methods of verification. Income may also include off-season employment and/or unemployment.

- *Payment Standards:* HABC's payment standards policy allows HABC to apply payment standards outside of the regulatory range to support leasing in revitalized areas and opportunity neighborhoods.
- *Income Calculation:* Using its MTW flexibility, HABC will calculate annual income by adding the income the family expects to receive during the 12-month period following the family's admission or regular reexamination effective date. Accordingly, annual income is calculated by projecting current income forward for a 12-month period.
 - This method of income calculation will be used for new admissions, regular and interim reexaminations. Exceptions to this policy include but are not limited to families with seasonal income. For these families, retrospective income will be used.
 - On the third occasion of a family reporting a reduction in income within 3 months of a scheduled reexamination, HABC will use retrospective income to calculate annual income.
 - If an estimate can be made for those families whose income fluctuates from month to month by income averaging, this estimate will be used so that the housing payment will not change from month to month.
 - If there are bonuses or overtime, which the employer cannot anticipate for the next 12 months, bonuses and overtime received the previous year will be used.
- *Health & Medical Expense & Disability Assistance Expense Deductions:* As an alternative to the HOTMA deduction regulations, HABC, will use its MTW flexibility to retain its existing deduction policy whereby health and medical expenses may be deducted to the extent that such expenses exceed 3% of gross annual income.
 - Additionally, HABC will retain its existing policy on disability assistance expenses where they may be deducted to the extent that if, in combination with any medical expenses, the applicable disability assistance expenses exceed 3% of gross annual income.
- As HABC has retained the 3% threshold for deduction of medical expenses, as opposed to the HOTMA 10% threshold, HABC will not provide an additional hardship policy. Families who have had increases in medical expenses can request interim rent reductions through HABC's MTW interim recertification policy.
- *VASH and EHV Vouchers:* HABC has received HUD approval to apply the MTW flexibilities under this Rent Simplification activity to families with VASH and EHV vouchers.
- *Payment Standards at RFTA submission:* When the payment standard goes down between the date the RFTA is submitted and the lease effective date, HABC will apply the higher payment standard in effect when the RFTA was submitted. This policy will apply to leasing new admissions and moves. Additionally, HABC has approval to update the voucher size and payment standard at the certification when family composition changes are reported; however, HABC's policy on when it will update the voucher size and payment standard will be stated in the Administrative Plan.

- *Applying Increased Payment Standard:* When there is a contract rent increase between regular recertifications, HABC will update the payment standard at the interim recertification only if the payment standard has increased. HABC does not decrease payment standards for occupied units. Additionally, HABC will update payment standards at the time of a move and at the next regular reexamination, regardless of the number of months following the effective date of the payment standard amount.
- *BRHP to HABC Transition:* There are approximately 375 BRHP families who moved from Opportunity Neighborhoods to Baltimore City and who wish to remain in Baltimore City. BRHP will transition these vouchers to HABC. To minimize any financial hardship related to the transition of the vouchers to HABC administration, HABC will retain the BRHP approved MTW Rent Simplification deductions for these families. HABC will apply its remaining Administrative Plan policies to these households.
- *Change in Income with Family Composition Changes: Public Housing Only -* When a family adds an adult to the household, HABC will conduct an interim recertification to add the individual to the household as well as add any earned or other income for that individual. Where the income from the new adult results in a TTP which is greater than the flat rent, HABC will cap the rent at the applicable flat rent (this cap does not apply to over-income households). At the family's next regular recertification, the family will be provided with a choice of income based or flat rent. Over-income households will follow the HUD prescribed over-income policy.

Planned Non-Significant Changes

The following non-significant changes are planned for FY 2026:

- *Adjustments for Inflation:* HABC may set and adjust standard deductions (such as the elderly, disabled, and dependent deduction) to reflect changes in the cost of living over time and remain aligned with current economic conditions. HABC may, at its discretion, apply periodic adjustments to deduction amounts based on a transparent methodology tied to an inflationary index like the Consumer Price Index (CPI), rounding to the nearest \$25 increment.

HABC will add the following clarification in FY 2026 to the Changes in Income with Family Composition rule:

- The rent cap will not apply to over-income households. Over-income households will follow the HUD prescribed over-income policy.

Planned Significant Changes

No significant changes are planned for FY 2026.

Activity #2019-02: Local Fair Market Rent

Plan Year Approved, Implemented, Amended

Approved FY 2019; implemented FY 2020.

Description/Update

This activity was implemented for both HABC's Leased Housing Program and the Baltimore Housing Mobility Program operated by the BRHP and remains subject to funding availability. BRHP administers the vouchers for the Thompson Remedial and Partial Consent Decree vouchers. MTW flexibility continues to be utilized to support Thompson activities and Attachment C, section B.2 of the MTW Agreement authorizes HABC to partner with non-profit entities such as BRHP to implement some or all MTW activities.

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

HUD previously approved this activity as part of the FY 2009 MTW Annual Plan. Subsequently, HUD approved 50th percentile FMRs for the metropolitan Baltimore area at which time HABC removed this activity. With the advent of SAFMRs, the 50th percentile FMR for Baltimore was removed and the activity was re-proposed.

HABC has assessed the impact of the proposed activity and determined that it will have no adverse impact on voucher holders. As noted above, HABC and BRHP have utilized the 50th percentile FMRs to establish payment standards since FY 2009. Therefore, continuation of this policy will not change existing rent policies and will not result in hardships to voucher holders.

Planned Non-Significant Changes

No non-significant changes are planned for FY 2026.

Planned Significant Changes

No significant changes are planned for FY 2026.

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

Plan Year Approved, Implemented, Amended

Approved FY 2020 and implemented FY 2021.

Description/Update

HABC uses its MTW authority to modify the provision set forth in PIH Notice 2016-05 Streamlining Administrative Regulations for Programs Administered by Public Housing Agencies as it relates to housing quality standard 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 \$100 fee to owners for reinspection (fee increased from \$75 to \$100 in 2026). From time to time, HABC may review and modify the reinspection fee to reflect changes in the cost of re-inspections. Outlined below are the circumstances under which reinspection fees will be charged. This activity applies to the tenant-based and project-based programs.

- 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 provision 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.
- For a unit not currently under HAP contract and where an 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.
- For a unit not currently under HAP contract, HABC will provide owners with instructions on how to obtain the inspection reference guide. If the unit fails the first inspection, HABC will schedule a reinspection at no charge. If the unit fails the reinspection, HABC will charge the owner a reinspection fee to schedule a second reinspection if the family wishes to continue the process of leasing that unit. The reinspection fee must be paid in full prior to HABC conducting a second reinspection of the unit.

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

The reinspection fee will not apply to:

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

Planned Non-Significant Changes

- HABC will increase the reinspection fee from \$75 to \$100 in FY 2026.

Planned Significant Changes

No significant changes are planned for FY 2026.

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

(Formerly Modified Rent Reasonableness Policy)

Plan Year Approved, Implemented, Amended

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

Description/Update

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

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

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

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

Starting in 2024 and on an annual basis, HABC will apply the statistics from the Consumer Price Index for the Baltimore-Columbia-Towson area for all Urban Consumers to adjust the rent ranges used in HABC's rent reasonable rent range tables. Alternatively, HABC may opt to update the market analysis to reset the rent ranges.

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

The rent range by sub-market and payment standards up to 135% of FMR applies to units leased in the Tenant-Based and Project-Based programs at the time of new admission or when moving to another unit

(not for rent increases). HABC may also apply payment standard caps when and if funding restrictions arise.

Rent Cap Policy (Rent Increases Only): Under this activity HABC may place a cap on contract rent increases for assisted Tenant-Based and Project-Based units. The established cap will reflect market conditions for the applicable time period and will be subject to a reasonable rent determination.

Planned Non-Significant Changes

In FY 2026 HABC proposes to add two restrictions to the rent cap policy when a rent increase has been denied or limited and the owner requests a reasonable rent review. Owners may be permitted a reasonable rent review only if the two following conditions are met:

- The voucher holder has been living in the unit for a minimum of 3 years; and
- The original contract rent prior to any adjustment is at least 10% below the highest end of the submarket rent range.

Planned Significant Changes

No significant changes are planned for FY 2026.

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

Plan Year Approved, Implemented, Amended

Approved FY 2020 and implemented FY 2020.

Description/Update

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

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

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

- Allow HABC to pay over the appraised amount by up to 10% in order to compete with buyers who are able to meet the seller’s contractual term requirements at lower amounts. This waiver would authorize HABC to pay over appraised value without having to seek HUD approval for each transaction.
- Increase the TDC limit for the Bailey units up to 50% over HUD’s current TDC limit for the appropriate building type and unit size.

Through 2025, HABC has acquired eight of the ten Bailey units. Five of the acquired units are occupied and the sixth unit is under construction and will be completed and occupied on/before year-end 2025. Two units are currently under contract and are expected to close before the end of 2025.

In FY 2026, HABC will continue to vet listings and search for units that are within the established TDC thresholds. HABC is projecting to acquire two additional units in FY 2026, which will bring the total units purchased under this activity to ten.

Planned Non-Significant Changes

For clarity, the TDC over 50% that was previously approved reflects the HUD annually adjusted TDC for the appropriate building and unit size rather than a fixed amount.

Planned Significant Changes

No significant changes are planned for FY 2026.

Activity #2021-01: Emergency Waivers

Plan Year Approved, Implemented, Amended

Approved FY 2021 and implemented FY 2021.

Description/Update

The COVID-19 outbreak threatened the lives of many Americans and the livelihoods of many more. It was an urgent health crisis of unprecedented scale, and one that was disproportionately impacting low-income families. The outbreak of COVID-19 also placed additional burdens on housing authorities who work 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 provided 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 was unknown and the backlog of transactions, inspections and delayed reporting requirements grew. Accordingly, HABC will use its MTW authority to establish an emergency waivers activity which addresses the burdens placed on all stakeholders. HABC may establish the following emergency waivers in response to economic and health related emergencies and natural disasters as declared by the Mayor or his/her designee, including the authority to determine when to place and lift the waivers. HABC may revise, add and/or remove waivers as needed to address emergency related conditions.

- **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 2025, HABC would complete the reexam by July 2026. The next scheduled biennial reexam would take place in July 2028. This waiver applies to the PH and HCV programs.
- **Verification of Income:** During periods of declared emergencies, HABC will waive the requirements of the verification hierarchy, but continue to use EIV to confirm income at interim and regular recertification.
- **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.

- **Delayed Regular Inspections:** HABC will waive the requirement for completion of regular inspections at least biennially. Where a regular inspection has been delayed, HABC will complete the inspection no later than the anniversary month of the following year. The next inspection will be scheduled on the same anniversary month using the applicable inspection frequency for the unit. For example, if an inspection was due on July 2025, HABC would complete the inspection by July 2026. The next scheduled annual inspection would take place in July 2028. 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.
- **Interim 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.
- **QC Inspections:** HABC will waive the requirement to conduct quality control inspections and instead will suspend quality control inspections until the emergency waiver has been lifted. This waiver applies to the HCV program.
- **Homeownership Inspections:** HABC will waive the requirement for the initial HABC inspection for homeownership units; however, an independent professional inspection will still be required. This waiver applies to the HCV Homeownership Program.
- **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.
- **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.

HABC does not anticipate utilization of the Emergency Waivers in FY 2026; however, the activity will remain open in the event conditions arise which dictate the need for these emergency waivers.

Planned Non-Significant Changes

No non-significant changes are planned in FY 2026.

Planned Significant Changes

No significant changes are planned in FY 2026.

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

Plan Year Approved, Implemented, Amended

Approved FY 2021 and implemented FY 2023

Description/Update

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

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

BRHP has developed program documents and the Action Plan for the GAIN program and has secured private funding from a local foundation to launch the program and support some of the escrow payments. Additionally, BRHP is working with Compass Working Capital, a leader in the FSS space to provide technical support and/or training prior to program launch. The first program participants were enrolled in 2023. Participants were enrolled through 2024 and hit the maximum of 250 enrolled participants in late 2024. As of June 2025, nearly \$100,000 of escrow deposits have been made for completion of 246 individual goals. There have been 8 graduates of the GAIN program, with most graduates purchasing a home and exiting the voucher program. Quarterly check ins with GAIN participants continue, and BRHP anticipates an additional \$100,000 of escrow deposits for goal completions in 2026.

The general parameters for incentive payments are as follows:

Track	Incentive*	Goal
Education	\$300-500	Completion of GED, post-secondary degree, or career certification
	\$300	Completed semester or quarter for completion of full-time post-secondary or career training

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

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

Planned Non-Significant Changes

No non-significant changes are planned for FY 2026.

Planned Significant Changes

No significant changes are planned for FY 2026.

Activity #2022-01: Student Housing Initiative

Plan Year Approved, Implemented, Amended

Approved FY 2022 and implemented FY 2023.

Description/Update

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

Initial eligibility for the SHI includes:

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

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

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

If the subsidy is terminated for any reason, any remaining household member is not entitled to retain the voucher unless otherwise eligible for the Student Housing Initiative.

The SHI subsidy will operate as follows:

- SHI participants will pay the highest of 10% of gross monthly income, 30% of adjusted monthly income or a \$25 minimum rent and will have recertifications completed on a biennial basis during their participation in the program.
- In the event the gross rent exceeds the applicable 1- or 2-bedroom payment standard, the SHI participant will pay the difference; however, HABC will not approve a unit where the family share is greater than 40% of the family's adjusted monthly income.
- Generally, the voucher will be provided for up to four years for eligible, matriculated, full-time students in an accredited 4-year college program and up to five years for eligible, matriculated,

full-time students in an accredited 5-year college program. Students enrolled in 4-year community colleges within HABC's jurisdiction are also eligible under this activity.

- An additional post-graduation year may be provided if the student remains income eligible and has not yet secured permanent full-time employment. HABC will terminate the subsidy during the fifth year within 60 days of securing full-time employment. Participants will be required to notify HABC within 30 days of securing full-time employment.
- Where a student becomes part of the SHI program after they have already completed course work at a Baltimore City college/university, HABC will adjust the participation period in the program to reflect the remaining portion of the applicable year cap.
- The family size must be consistent with the occupancy standards for a 1- to 2-bedroom unit without being over-crowded.
- HABC will conduct reasonable rent determinations prior to unit approval.
- HABC will provide utility allowances to students where the cost of utilities is not included in the rent.
- The subsidy will be limited to housing assistance, in the form of rent in privately owned housing and will be paid directly to the housing provider; however, where applicable, the subsidy may cover security deposit assistance up to one month's subsidy.
- HABC will conduct the HQS inspections.
- If the student is at \$0 HAP for 6 months, the subsidy will be terminated, and assistance will no longer be provided.
- Prior to terminating a participant's voucher, HABC will provide the participant with sixty-day's written notice and offer the participant an opportunity for an informal hearing where applicable.

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

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

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

changes which may be needed to increase program success rates. Where significant changes are needed, HABC will re-propose the SHI activity.

HABC signed an MOU with Coppin State University who began to refer SHI applicants in 2023 with the first SHI lease up accomplished in 2024. HABC anticipates that 10 SHI participants will be under lease by the close of 2026. Once the SHI program cap has been met, HABC will only accept referrals to turnover the voucher.

Hardship

In the event that a student needs to take an extended leave from his or her academic program, the subsidy will be discontinued; however, the student may reapply, through their college/university, to the SHI as long as the program continues to operate. For leaves which do not exceed two months in duration, and which have been reviewed and approved by HABC and the partner college/university, the subsidy will continue.

Planned Non-Significant Changes

No non-significant changes are planned in FY 2026.

Planned Significant Changes

No significant changes are planned in FY 2026.

Activity #2022-02: Leasing Incentive Program

Plan Year Approved, Implemented, Amended

Approved FY 2022 and implemented FY 2022.

Description/Update

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

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

To support and encourage owner participation in the HCV program, the LIP will also provide vacancy and damage payments to owners payable under defined circumstances. HABC prepares annual budgeted spending for leasing incentives, damage/vacancy loss and security deposit assistance. Pending the response to this activity; HABC may revise the activity budget accordingly.

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

- A \$750 one-time incentive for a new unit in an "Opportunity Area". "Opportunity Areas" are those zip codes which have been identified by HABC as Opportunity Areas.
- A \$500 one-time incentive for a new HCV program unit. "New Unit" refers to a unit which has never been leased under the HCV program or was last leased under the HCV program five or more years ago.
- A \$500 one-time incentive to a new owner who leases an HCV unit. "New Owner" refers to an owner who has never previously leased a unit under the HCV program or who had last leased a unit under the HCV program five or more years ago. The new owner must enter into a new HAP contract.
- A \$500 one-time incentive for a new accessible dwelling unit. An accessible dwelling unit is a unit that is located on an accessible route and can be approached, entered, and used by individuals with physical disabilities.
- A \$500 one-time incentive for a newly constructed unit. "Newly constructed" refers to a unit in which construction was completed within the past twenty-four months. Where a new unit to the program is new construction, the owner will receive only the new construction incentive.

- The maximum incentive payment for any given unit is \$1,500.
- Incentive payments are payable upon execution of the HAP contract.
- Where a unit had previously been leased by an HCV participant and there is a gap in leasing with the HCV, program, HABC will not provide an incentive when and if the unit gets leased by a new HCV participant unless the gap is five or more years.

HCV Security Deposit Assistance: The Leasing Incentive Program also include Security Deposit Assistance for the following families:

- Required to move due to owner HQS violations; and
- New admissions whose gross annual incomes are lower than 50% of AMI

HABC provides security deposit assistance, up to the contract rent for eligible HCV families. This assistance opportunity will be provided once during the life of a family's participation in the HCV program; once assistance has been provided, the participant will not be eligible to receive assistance again. HABC will provide the security deposit directly to the owner; however, upon move out, the security deposit will go back to the family for use in leasing another unit. HABC is using this feature to provide incentives for voucher holders to maintain their units to ensure they can use the returned security deposit to move to another HCV unit, where applicable. HABC anticipates that approximately 859 families will benefit from the security deposit assistance and that the average security deposit will be approximately \$1,396 per family. HABC has budgeted accordingly to cover this cost; however, HABC reserves the right to modify the amount of the security deposit assistance for consistency with economic conditions and funding availability.

Vacancy and Damage Loss Payments: Where vacancy and damage loss payments are concerned, HABC provides payments to owners as outlined below. This policy only applies to Tenant-Based Vouchers, while funding permits.

- **Vacancy Loss Payments** may be made available to owners whose tenants vacate the unit without notice or HABC authorization, prior to the end of their initial 12-month lease term. To qualify for the vacancy loss payment, the unit owner must re-rent the unit to another HCV family within 60 days from the date that the owner notifies HABC of move-out. Owners will be paid only for the length of time the unit was vacant, with a maximum payment equivalent to the lowest of two months of HAP or \$3,000. In addition, HABC will only reimburse owners to the extent that the lost rent is not covered by the security deposit (after being applied to any damages). Finally, owners must demonstrate a good faith effort to re-rent the unit to another HCV family during the period of vacancy. Requests for vacancy claims must be submitted within 30 days of releasing the unit.
- **Damage Loss Payments:** HABC may provide a one-time damage loss payment up to \$3,000 for owners to cover costs, beyond normal wear and tear, which are not covered by the security deposit, provided that the owner agrees to lease the unit to another HCV client within 60 days from the date that the owner notifies HABC of the damages. HABC will not reimburse for tools needed to repair damages, landlord's personal time to repair damages or other activities related to the claim, items allegedly stolen, or damages not represented in HABC's inspection report.

Requests for damage claims must be submitted within 30 days of the participant's move out date or owner re-taking possession. HABC will inspect the unit to validate the owner's damage claim.

PH Leasing Incentive: HABC will offer a one-time \$250 rent credit to applicants who agree to lease a hard to lease unit. A unit will be considered "hard to lease" when the unit has been vacant for 30 days after being placed in a "ready to lease" status and there have been at least two prior unit refusals for the current vacancy. Applicants who accept "hard to lease" units and who receive the leasing incentive will be required to remain in the unit for at least one year, with exceptions being granted for reasonable accommodations, unit conditions and/or personal safety.

Planned Non-Significant Changes

HABC proposes the following non-significant changes to the PH Leasing Incentive:

- The credit to applicants will be lowered from \$500 to \$250
- HABC may offer to incoming families at zero or minimal income a flexible incentive rather than a rent credit. For example, HABC may offer families additional unit enhancements or furniture, including a television, air conditioning unit, ceiling fan, microwave or other incentives.

Planned Significant Changes

No significant changes are planned for FY 2026.

Activity #2024-01: Get Ready for Opportunities to Work

Plan Year Approved, Implemented, Amended

Approved FY 2024. Implemented in 2025.

Description/Update

HABC is committed to expanding access to employment, training, and educational opportunities for HABC residents while also promoting economic self-sufficiency. The Get Ready for Opportunities to Work (GROW) program is a new program designed to build on and enhance HABC's self-sufficiency initiatives. The GROW program applies to public housing participants only. As a condition of continued occupancy, unemployed, work-able residents must agree to participate in the GROW program with the ultimate goal of sustained employment. To help ensure residents' success, HABC will provide GROW participants with career counseling, service navigation and access to HABC and partner programs.

Admission: As part of the screening process, families will be informed of the requirement to sign a GROW program lease rider and that failure to participate in and adhere to the GROW program requirements will constitute a material violation of the lease and may result in lease termination. Additionally, during screening, HABC will identify the current work-able, unemployed adult family members who would be required to participate in and adhere to GROW program requirements.

Non-exempt family members, who do not meet the GROW program requirements, will be scheduled to attend a required orientation with HABC's Office of Resident Services (ORS) to develop an EDP (Economic Development Plan) and execute a GROW program contract. Non-exempt family members who do not meet the GROW requirement at lease-up will be required to come into compliance within 180 days from the effective date of the GROW contract.

Continued Occupancy: At their next recertification after GROW program implementation, existing families will be required to execute a GROW program lease rider and be screened to identify any non-exempt family member who is not in compliance with GROW program requirements. Throughout the term of the lease, *all family members aged 18-54 who are not exempt* from the GROW program requirement must be:

- Working 20 hours or more per week for at least 9 months per year; or,
- Enrolled in a HABC-approved job training; or,
- Enrolled in a HABC-approved education program.

Subsequent to the orientation session, ORS will meet with applicable, non-exempt family members to review needs and challenges, to develop an EDP and execute a GROW program contract. Non-exempt family members who do not meet GROW program requirements will be required to work with the ORS department and come into compliance within 180 days from the effective date of the GROW contract. Failure to follow GROW program requirements is a material violation of the Lease.

Exempt Family Members: Family members who fall into one or more of the following categories are exempt from the GROW Continued Occupancy Policy:

- Persons with disabilities, as defined by 24 CFR Parts 8.3 and 100.201 who are unable to work
- Persons aged 55 and over
- Children under age 18
- A single adult family member who is the parent/legal guardian of a child under the age of 4 in the household. Once the child reaches age 4, the parent/legal guardian is no longer exempt.
- A family member, who is the sole caregiver for an elderly/disabled family member in the household. A sole caregiver is a family member who is essential to the care and well-being of an elderly or disabled family member as verified by a knowledgeable medical provider. When the disabled or elderly household member no longer resides in the unit, the caregiving adult household member is no longer exempt.
- Non-Public Housing Over-Income families

Interim Changes: When a family member reports a change in circumstances, i.e., leaves or loses a job or leaves an education/training program, HABC will inform the family member and head of household of instances where they are not in compliance with GROW program requirements and refer the family to ORA. The non-compliant family member will be given 90 days from the GROW contract effective date to comply. Exceptions related to compliance time frames will be made on a case-by-case basis by ORS staff.

Coordination with FSS: Non-exempt residents who are not working or enrolled in an education/job training program and who are under an FSS Contract of Participation when the GROW program is implemented, will have their FSS CoP timeline updated on employment/job training/education to reflect the GROW program requirements.

Non-exempt residents who are not compliant with the GROW program will be required to become compliant with the GROW program requirements prior to enrolling in FSS.

Compliance: HABC will verify employment, education and/or job training status for all non-exempt family members at admission and at each regular recertification. HABC will verify this information in accordance with the requirements and methods outlined in HABC's policies and procedures on verification.

If a non-exempt family member is not in compliance with GROW program requirements, HABC will refer the family member to the ORS. Family members under a GROW contract will be required to provide documentation that they are engaged in an eligible work requirement activity.

If the family does not comply by the end of the contract period, HABC may proceed with lease enforcement including removal of the non-compliant family member from the household or lease termination for single person households. However, HABC may extend the contract period and defer lease enforcement if the family member is actively working with the ORS to remove barriers to compliance. In such cases, HABC will verify that the family member is engaged in a barrier removal activity.

Partners: To ensure the success of the GROW program, HABC has established agreements with partner agencies to provide services to GROW program participants to assist them with the following:

- Employment search & career counseling
- Education guidance and planning
- GED services
- Career assessment
- Workforce development
- Assistance with applications for education financial aid
- Assistance with career programs, continuing studies, vocational/technical schools and apprenticeships
- Financial management

Hardship: A family may request a temporary hardship exemption from the GROW Continued Occupancy Policy for one or more family members if they:

- Have a short term-medical issue or disability
- Are a victim of domestic violence
- Have emergency public safety concerns
- Have a childcare related issue
- Have a transportation related issue
- Have a death in the family

To qualify for the hardship exemption, a family must submit the request for hardship exemption in writing. Approval is subject to applicable verification requirements. If approved, the period for temporary hardship exemption will not exceed 90 days. A family can request an extension to the 90-day period if the hardship conditions continue and can be verified. HABC will make determinations on extensions to temporary hardship on a case-by-case basis.

Information that is obtained regarding medical, disability or public safety hardships will be used or disclosed only for purposes relating directly to the hardship request. All information considered “private data on individuals” will be handled in compliance with HABC’s policies on Privacy.

HABC has completed a number of planning activities for the GROW program including preparation of the lease rider and conducting public meetings. In FY 2025 HABC executed the approved lease rider, completed staff training and fully implemented the GROW program.

Planned Non-Significant Changes

- HABC will allow families to self-certify caregiving status to determine exemption.
- Prior to enrolling in FSS, a family must be compliant with the GROW program requirements.

Planned Significant Changes

No significant changes are planned for FY 2026.

Activity #2024-02: Program Efficiencies (Previously Activity 2020-03 Local Forms)

Plan Year Approved, Implemented, Amended

Approved FY 2024 and implemented FY 2024. (Local Forms activity was approved and implemented in 2020.)

Description/Update

HABC has developed program efficiencies which are designed to simplify processing and streamline administrative processes. HABC has renamed the previously approved Local Forms activity.

Local Forms: (previously approved in 2020) HABC creates local versions of forms, as needed, to streamline processing, utilize “plain language”, address MTW policies and address local housing market features. HABC plans to develop local versions of the Project-Based Voucher (PBV) Housing Assistance Payment (HAP) contract, the Tenant Based HAP Contract and related PB and TB Tenancy Addendums. Any changes to the HAP form will be submitted to HUD for review and will include language noting that funding for the contract is subject to the availability of appropriations and other required provisions identified by HUD. Development of any local form will meet all applicable HUD requirements.

Planned Non-Significant Changes

For FY 2026, HABC proposes the following updates to this activity: HABC will develop a Supplement to Application form which includes an option for an applicant or participant to identify a contact for questions or concerns regarding household possessions.

Planned Significant Changes

No significant changes are planned for FY 2026.

Activity #2025-01: Affordable Housing Preservation Fund

Plan Year Approved, Implemented, Amended

Approved FY 2025. Implementation planned for 2025

Description/Update

HABC is currently utilizing MTW funding to support the preservation of affordable rental housing units through the implementation of a new Affordable Housing Preservation Fund (AHP).

This activity may be used to support a variety of preservation efforts including the revitalization of non-federal affordable housing developments and mixed-finance projects that may involve Low-Income Housing Tax Credit (LIHTC) units. Eligible non-federal developments may include properties originally funded through state capital programs, such as the Partnership Rental Housing Program, where legal title is held by the PHA or a PHA-controlled entity. These properties are governed by regulatory agreements with the Maryland Department of Housing and Community Development (DHCD), which mandate that all units are leased to low-income households. The LIHTC developments are mixed-finance projects containing a blend of LIHTC, Project-Based Voucher (PBV), and Annual Contributions Contract (ACC) units. AHP funds are being used to support only the units that do not fall under public housing or Section 8 programs.

This local non-traditional activity falls under the category of Housing Development Programs as defined in HUD PIH Notice 2011-45. The activity adheres to the General Parameters detailed in part 5.A. of the Notice, as well as the part 5.D parameters applicable to Housing Development Programs. MTW Block Grant funds will be used to renovate units that are not federal public housing or Housing Choice Voucher units.

AHP funds are being deployed to revitalize units serving households earning at or below 80% of Area Median Income (AMI). Where regulatory or operating agreements dictate lower income thresholds, HABC is adhering to those terms. Repairs and improvements continue to ensure all preserved units meet HUD inspections requirements. Rental units funded through AHP may be owned by an HABC instrumentality or other public or private entities. Examples of the types of rental projects eligible for AHP funds include:

- Existing state-aided housing developments slated for preservation/redevelopment
- Affordable developments involving LIHTC
- At-risk affordable developments nearing the end of their compliance period

HABC is funding only projects that have demonstrated readiness to proceed. This includes evaluation of zoning and permitting status, architectural plans, and other secured funding commitments. Projects that prioritize units for homeless households or incorporate mixed-use components may receive additional consideration.

While no per-unit funding cap has been formally established, HABC anticipates that average AHP preservation costs will not exceed \$32,000 per unit in FY 2026. In cases where more extensive

rehabilitation is needed, higher costs may be incurred; HABC will seek HUD approval if Total Development Costs (TDCs) exceed established thresholds.

Projects Funded & Proposed to Be Funded

- FY 2025: HABC used this activity to support the preservation of 422 affordable housing units at 10 sites. Of these, 263 units – comprised of state-funded and LIHTC units – have been supported through the AHP. The remaining 159 units, including 21 PBV units at Barrister Court, Indecco, and Sharp Leadenhall, and 138 ACC units at Montpelier's Choice, Sharp Leadenhall, Renaissance at Reservoir Hill, and Arbor Oaks, are received preservation funding through HABC's capital program or the use of single fund flexibility, and therefore do not fall under this local, non-traditional activity. The AHP funding amounts expended and units preserved for these sites will be included in the FY 2025 MTW Report.
- FY 2026: HABC proposes to utilize MTW funding to support 52 LIHTC units at Flag House (I & II).

The following table provides a summary of AHPF projects planned for the current Plan year, along with any projects completed to date. Note that actual development timetables may vary depending on several factors including schedules related to project financing, local and/or HUD approvals, procurement and other factors.

HABC will report on all funded activities through the MTW Annual Report.

Development Name	# of LNT Units Preserved	Estimated / Actual AHP Funding	# of PBV Units under a HAP Contract*	# of Public Housing ACC Units*	Total Units Preserved	MTW Plan Status	Project Status
Barrister Court	24	\$630,000	8		32	Approved - FY 2025	In planning
Indecco	36	\$919,149	9		45	Approved - FY 2025	In planning
Irvington Place	41	\$1,046,809			41	Approved - FY 2025	In planning
Montpelier's Choice	26	\$657,191		13	39	Approved - FY 2025	In planning
Norman Lohn	12	\$306,383			12	Approved - FY 2025	In planning
Somerset Chase	22	\$561,702			22	Approved - FY 2025	In planning
West Lexington	44	\$1,123,404			44	Approved - FY 2025	In planning
Sharp Leadenhall	4	\$520,000	4	23	31	Approved - FY 2025	In planning
Renaissance at Reservoir Hill	24	\$2,040,000		40	64	Approved - FY 2025	In planning

Development Name	# of LNT Units Preserved	Estimated / Actual AHP Funding	# of PBV Units under a HAP Contract*	# of Public Housing ACC Units*	Total Units Preserved	MTW Plan Status	Project Status
Flag House	52	1,352,000		130	182	Proposed - FY 2026	In planning
TOTAL	285	\$9,156,638	21	206	512		

**For transparency, the PBV and ACC units that are receiving preservation funding through other sources have also been included in the project table. The PBV and ACC units will not receive funds under this activity; but will receive funding under HABC's capital program or through the use of single fund flexibility.*

HABC will utilize unspent FY 2025 funds for development of non-ACC, low-income non-public housing units in FY 2026.

Planned Non-Significant Changes

- In FY 2026 HABC proposes to utilize MTW funding to support 52 LIHTC units at Flag House (I & II), as reflected in the table above.
- Revitalization for the development Arbor Oaks was completed in FY 2025 and no additional funds will be spent on the project in FY 2026.

Planned Significant Changes

No significant changes are planned in FY 2026.

B. Not Yet Implemented Activities

There are no approved activities which have not been implemented.

C. MTW Activities on Hold

The following activity is on hold. HABC intends to close out this activity in the MTW Report.

Activity #2020-02: The Healthy Opportunities Program

Plan Year Approved, Implemented, Amended

Approved FY 2020; Implemented: FY 2022.

Description/Update

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

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

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

HABC, in concert with its program partners, implemented the HOP program in the latter part of FY 2022, including providing mobility counseling and supportive services. HABC will work with its partners to evaluate barriers to housing for this population.

Planned Non-Significant Changes

No non-significant changes are planned.

Planned Significant Changes

This activity will be placed on hold for FY 2026 and will be closed out in the MTW Report.

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 2026 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, which is a transitional housing program. In 2014, the Collington House facility lost its eligibility to retain project-based vouchers, and this program was closed out.
Section 811 Supportive Housing (Activity 2009-02)	Never Implemented	2019	HABC proposed combining MTW funds with 811 funds to create units for non-elderly persons with disabilities pursuant to the Bailey Consent Decree. HABC intended to make these funds available through a competitive process under which developers would be required to demonstrate through specified

Activity	Plan Year Approved and Implemented	Close Out Year	Reason for Close Out
			documentation that the project had a gap that could not otherwise be addressed. HABC was not able to implement this activity due to a lack of interest from developers. As such, there are no final outcomes. Gauging developer interest and including developers in the planning stages of such an activity may have yielded better outcomes.
Payment Standards at the 50 th Percentile (Activity #2009-03)	FY 2009	FY 2011	HUD had adjusted the area Fair Market Rent (FMR) to the 50 th percentile for HABC; therefore, MTW authority was no longer required, and this activity was closed out in FY 2011. Please note that this activity was re-proposed in the FY 2019 Plan as the 50 th percentile FMR was being phased out. At the time the activity was closed, use of the 50 th percentile FMR was provided by HUD, and MTW authority was not needed.
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).
Risk-Based Inspections- Thompson (Activity #2010-03)	Approved: 2010 Implemented: 2010	FY 2023	BRHP implemented a Risk-Based Inspection process to ensure high quality inspection standards and to provide for a more efficient inspection process. This activity originated prior to the implementation of HUD's biennial inspection frequency. Unit inspections

Activity	Plan Year Approved and Implemented	Close Out Year	Reason for Close Out
			<p>were completed at least once every twenty-five (25) months. Where the 2014 Appropriations Act provided flexibility to transition to a biennial inspection schedule, BRHP initially maintained their 25-month inspection schedule which provided an additional month to ensure timeliness of regular inspections.</p> <p>Over the course of the past thirteen years, BRHP has completed regular inspections within a 24-month window and no longer feels that the 25-month time-frame is necessary. The quality and timeliness of regular inspections can be achieved without the waiver needed in this MTW activity.</p>
Utility Allowance for Families Living in Larger Units than Voucher Size (Activity #2010-04)	<p>Approved: FY 2010</p> <p>Implemented: FY 2012</p>	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

Activity	Plan Year Approved and Implemented	Close Out Year	Reason for Close Out
			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 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.
Direct Homeownership Program (Activity 2012-02)	2012	2019	The direct purchase second mortgage program was intended for applicants with incomes of no less than \$18,000 per year. Participants in this initiative would not receive a Section 8 homeownership voucher. A soft second mortgage of HOME VI funds would also be available.

Activity	Plan Year Approved and Implemented	Close Out Year	Reason for Close Out
			The direct purchase second mortgage program was targeted to applicants with incomes of no less than \$18,000 per year. Participants in this initiative would not receive a Section 8 homeownership voucher. A soft second mortgage of HOME VI funds was to be made available through this program. The activity was closed out due to lack of participation.
Rent Policy (Activity #2012-03)	FY 2012	FY 2015	HABC received HUD approval in FY 2012 to implement an Agency-wide rent policy adopted for Gilmore Homes; however, due to lack of funding and the on-going revisions of the Gilmore Homes rent policies, this activity was placed on hold in FY 2014. This activity was identical to the Gilmore Homes Demonstration Program and was implemented at the remaining HABC sites. A shortage of funds to provide employment counseling forced the closure of this program in FY 2015.
Adjusted Income for Thompson Participants (Activity #2012-04)	FY 2012	FY 2019	<p>Pursuant to HABC's MTW authority, for participants in the Baltimore Housing Mobility Program, gross annual income was reduced using standard deductions. This activity was approved and implemented in FY 2012.</p> <p>There is a standard deduction for working families, disabled families and non-disabled families without wages. The deductions replace all other regulatory deductions. The deductions are:</p> <ul style="list-style-type: none"> • \$3,200 for households with wages

Activity	Plan Year Approved and Implemented	Close Out Year	Reason for Close Out
			<ul style="list-style-type: none"> \$1,200 for households without wages \$400 for any elderly or disabled family (to be combined with either of the above deductions) <p>This activity was closed out in FY 2019 and combined with other previously HUD approved rent simplification activities for the Thompson units. The combined activity is now called Rent Simplification – Thompson (Activity #2012-01).</p>
Adoption of New Investment Policies for HABC (Activity #2013-01)	Approved: FY 2013 Not Implemented	FY 2015	In FY 2013, HABC proposed adopting new investment policies, thereby increasing investment revenue and decreasing the federal expenditures necessary to carry out the federal program. For example, if the investment revenue is increased by \$100,000 due to a more favorable investment rate of return, this increased revenue can be used to offset the OPEB liability. HABC decided not to implement this activity due to the terms of a General 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	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

Activity	Plan Year Approved and Implemented	Close Out Year	Reason for Close Out
Members (Activity #2014-02)			part of an effort to support economic self-sufficiency as well as to streamline program administration. As 100% of the income from these two sources is excluded, third party verification of income is not required. This activity was approved and implemented in FY 2014. This activity was closed out in FY 2019 and combined with other previously HUD approved rent simplification activities for the Thompson units. The combined activity is now called Rent Simplification – Thompson (Activity #2012- 01).
Encouraging Leasing in Higher Opportunity Neighborhoods (Activity #2015-01)	Approved: FY 2015 Not Implemented	FY 2016	Using its MTW authority, the Baltimore Regional Mobility Program required families to select units that are consistent with and not larger than the dwelling unit size listed on their voucher. This policy applied to new admissions as well as to participating households who requested program moves. HABC, on a case-by-case basis, made exceptions to this policy as a reasonable accommodation. This MTW activity was planned for implementation in FY 2015. However, upon further consideration, BRHP decided not to implement this activity, and it was closed out in FY 2016.
Energy Conservation Utility Allowance (Activity #2015-02)	FY 2015	FY 2016	HABC provides a Utility Allowance to households responsible for payment of utilities for water, electricity, gas, other heating, cooking fuels and sewage services. In an effort to reinforce energy conservation activities and reduce the cost of water/sewage utility allowances, HABC will encourage the completion of a

Activity	Plan Year Approved and Implemented	Close Out Year	Reason for Close Out
			<p>water audit and use of low-flow toilets by HCV tenants and landlords/owners.</p> <p>This MTW activity was placed on hold due to comments from the public and closed out in FY 2016.</p>
The Front Door Program (Activity #2015-03)	FY 2015	FY 2017	<p>HABC partnered with The Mayor's Office of Human Services/Homeless Services Program, Sarah's Hope (a shelter for the homeless) and St. Vincent De Paul to provide MTW Block Grant funds to the Front Door Program to rapidly house 36 homeless families for up to one year using two distinct strategies. The contract ended on December 31, 2014, six months into HABC's FY 2015, and was not renewed, which resulted in closure of the activity.</p>
Project Based Voucher Amendments to the HAP Contract (Leased Housing) (Activity #2015-04)	FY 2015	FY 2019	<p>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).</p>

Activity	Plan Year Approved and Implemented	Close Out Year	Reason for Close Out
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 the summer months. This activity was approved and implemented in FY 2017. HABC closed out this activity and combined it with other previously HUD approved Mobility Program Enhancement activities. HABC also modified this activity in FY 2019 under the previously approved Mobility Enhancement activity.
Sponsor-Based Project-Based Transitional Housing (Activity # #2017-01)	FY 2017	FY 2021	HABC partnered with the Women’s Housing Coalition to provide permanent housing for up to 25 homeless, hard-to-house families. A HAP Contract has been signed for up to 15 years with the option to renew; all families are housed and receiving supportive services allowing this activity to be closed out.

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

V. Planned Application of MTW Funds

This section of the Annual Plan describes HABC's estimated sources and uses of MTW Block Grant funds. This financial plan is compiled based on current information and is subject to revision as conditions and/or assumptions change. HABC has included, as Appendix A, the Estimated Sources and Uses of Non-MTW Funds for FY 2026.

A. Planned Application of MTW Funds in FY 2026

i. Estimated Sources of MTW Funds

Table 11: Estimated Sources of MTW Funding for FY 2026

FDS Line Item Number	FDS Line Item Name	Dollar Amount
70500 (70300+70400)	Total Tenant Revenue	20,648,477
70600	HUD PHA Operating Grants	514,488,782
70610	Capital Grants	22,674,842
70700 (70710+70720+70730+70740+70750)	Total Fee Revenue	-
71100+72000	Interest Income	2,605,317
71600	Gain or Loss on Sale of Capital Assets	-
71200+71300+71310+71400+71500	Other Income	1,510,815
70000	Total Revenue	561,928,233

Notes to Sources:

- Tenant Revenue is planned at a 97% occupancy rate. Total Tenant Revenue also includes estimated income billable from various tenant transactions such as warrant, court and maintenance costs anticipated during CY 2026.
- HABC's Total Operating Grants of \$514,488,782 from HUD include the following funding estimates:
 - HCV Housing Assistance Payments (HAP) subsidies in the amount of \$406,153,746, which includes \$64.5 million in MTW/HAP HUD held reserve funds;
 - Ongoing Administrative Fee Earned in the amount of \$22,270,734; and
 - Public Housing Subsidies of \$86,064,302, which is budgeted based on an estimated 90% funding proration for the calendar year ending December 31, 2026.
- Capital Grants funding of \$22,674,842 is based on planned capital improvement and construction activities as described in the Capital Improvement Plan.

- HABC does not report Fee Revenue as HABC has adopted a Local Asset Management Plan since FY 2010.
- Other Income is related to vending machines, excess utilities, and tenant charges from the Public Housing Program. It also includes Fraud Recovery for the recovery of funds from the Section 8 HCV program and reimbursements from Baltimore Affordable Housing Development.

ii. Estimated Application of MTW Funds

Table 12: Estimated Application of MTW Funding for FY 2026

FDS Line Item Number	FDS Line Item Name	Dollar Amount
91000 (91100+91200+91400+91500+91600+91700+91800+91900)	Total Operating – Administrative	53,553,581
91300+91310+92000	Management Fee Expense	13,302
91810	Allocated Overhead	-416,638
92500 (92100+92200+92300+92400)	Total Tenant Services	3,068,414
93000 (93100+93600+93200+93300+93400+93800)	Total Utilities	22,781,182
93500+93700	Labor	-
94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	106,730,749
95000 (95100+95200+95300+95500)	Total Protective Services	3,391,718
96100 (96110+96120+96130+96140)	Total Insurance Premiums	3,401,343
96000 (96200+96210+96300+96400+96500+96600+96800)	Total Other General Expenses	11,342,224
96700 (96710+96720+96730)	Total Interest Expense and Amortization Cost	1,499,751
97100+97200	Total Extraordinary Maintenance	-
97300+97350	Housing Assistance Payments + HAP Portability-In	337,653,746
97400	Depreciation Expense	17,790,998
97500+97600+97700+97800	All Other Expenses	126,361
90000	Total Expenses	560,936,731

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

Total Expenses	560,936,731
Less: Depreciation Expense	-17,790,998
Capital Hard Cost	18,782,500
MTW Uses of Funds	561,928,233

Uses of funds equal sources of funds.

Notes to Uses:

- Administrative expenses include salaries and benefits for administrative staff, salaries and benefits for Housing Management staff at the Asset Management Project (AMP) levels as well as program staffs for the Section 8 HCV Program. In addition, this category includes operating expenses such as office rent, telephone, computer materials and contracts, postage and supplies for all programs.
- Management Fees expense includes fees for HABC's Privately Managed Sites
- Allocated Overhead is calculated based on HUD's approved Local Asset Management Program since FY 2010. The proposed updated cost allocation calculations for CY 2026 are included in Appendix A.
- Tenant Services includes salaries, benefits, materials and supplies used to support tenant councils and the Resident Advisory Board, and to provide direct services to residents of public housing.
- Utilities include expenses for water, electricity, gas, steam and fuel consumed by HABC's AMPs. HABC continues to exercise prudent procurement actions to achieve favorable utility rates. Utility consumptions are adjusted based on addition or demolition activities planned for the fiscal year.
- Ordinary Maintenance includes salaries and benefits of maintenance workers assigned to public housing units. It also includes maintenance materials and maintenance contracts used for ordinary maintenance operations. This category also includes expense activities that will utilize MTW/HAP funds.
- Protective Services includes outside security contracts for the developments.
- Insurance Premiums are budgeted for properties, general liability, worker's compensation, automobiles, commercial crime, EDP data and media, boiler and machinery for the MTW activities.
- Other General Expenses include compensated absences, collection losses for uncollected rent and Payment in Lieu of Taxes (PILOT)
- Interest Expense is budgeted for interest associated with the EPC Debt Service.

- HAPs include rent subsidies paid to landlords and utility assistance paid to tenants under the Section 8 HCV program.

Depreciation Expense is estimated for the costs of tangible fixed assets allocated over their useful lives. Depreciation expense is based on HABC's fixed asset records and depreciation methods.

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

There is no variance between the Sources of funds and Uses of funds.

iii. Description of Planned Application of MTW Funding Flexibility

MTW agencies have the flexibility to apply fungibility across three core funding programs' funding streams – public housing Operating Funds, public housing Capital Funds, and HCV assistance (to include both HAP and Administrative Fees) – hereinafter referred to as "MTW Funding."

- Up to \$20 million for renovation and rehabilitation of existing HABC properties
- Up to \$20 million for construction and acquisition costs in support of HABCs strategic plan goals
- Up to \$9 million in Local Non-Traditional activities
- Up to \$7 million in support of maintenance activities in existing units
- Up to \$5 million for modernization activities
- Up to \$3.5 million for agency fleet replacement

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

Table 13: Planned Unspent Operating Fund and HCV Funding

Original Funding Source	Beginning of FY 2025 – Unspent Balances, Including HUD-Held Reserves	Planned Application of PHA Unspent Funds During FY 2025
HCV HAP*	\$ 198,024,115	\$ 64,500,000
HCV Admin Fee	\$ 20,296,637	\$
PH Operating Subsidy	\$ 101,710,920	\$
TOTAL:	\$ 320,031,672	\$ 64,500,000

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

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

Item No	Planned Use	Estimated Amount	Funding Source the Planned Use is Attributable to	Projected Timeline or Timeline Update
1.	Vacancy Renovations	20,000,000	HAP Reserves	1/1/26 – 12/31/26
2.	Development Activities	20,000,000	HAP Reserves	1/1/26 – 12/31/26
3.	Local Non-Traditional Activities	9,000,000	HAP Reserves	1/1/26 – 12/31/26
4.	Maintenance Activities	7,000,000	HAP Reserves	1/1/26 – 12/31/26
5.	Modernization Activities	5,000,000	HAP Reserves	1/1/26 – 12/31/26
6.	Vehicle Replacements	3,500,000	HAP Reserves	1/1/26 – 12/31/26

v. 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

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

HUD has approved HABC's LAMP as part of the Annual Plan process since FY 2010. The proposed updated LAMP cost allocation calculations for FY 2026 are included in Appendix B. The indirect cost rate for 2026 will be approximately 13.43% for MTW programs and 13.22% for Non-MTW programs.

vi. Rental Assistance Demonstration (RAD) Participation

Table 15 includes RAD conversions which have closed or are projected to close by the end of FY 2025. Table 16 includes RAD conversions which are slated for conversion in FY 2026 and beyond. Actual timetables for conversion and/or HABC's decision to proceed with conversion may vary from the information included below, depending on various factors including project feasibility determinations, project financing, timetables for HUD and other approvals and other factors. The timetable for RAD conversions extends beyond FY 2026 and continues to be refined in consultation with HUD and HABC's resident leadership. The listed projects may be modified in the future and are subject to approval by HUD and the HABC Board of Commissioners. HABC may apply for additional RAD conversions beyond those shown in Tables 15 and 16.

Table 15: RAD Conversions Closed or Projected to Close by the End of FY 2025

Property Name	# of Units Converted	RAD Conversion Type	Dated Closed	Major Milestone / Status	RAD Significant Amendment Submission Date*	RAD Significant Amendment Approval Date
Allendale	164	PBRA	11/2015	HUD approved certification of completion	5/12/2015	10/27/2015
Arbor Oaks	7	RAD/PBV Blend	09/2025	Projected Completion 2027	10/24/2022	1/19/2023
BE Mason	223	PBRA	11/2015	HUD approved certification of completion	5/12/2015	10/27/2015
Bel Park Tower	253	PBRA	11/2015	HUD approved certification of completion	5/12/2015	10/27/2015
Brentwood	150	PBRA	12/2015	HUD approved certification of completion	5/12/2015	10/27/2015
Broadway Overlook	84	PBRA	08/2017	HUD approved certification of completion	10/26/2016	1/26/2017
Carey House	23	PBV	11/2025	Submitted financing plan	10/24/2022	1/19/2023
Chase House	189	PBRA	12/2016	HUD approved certification of completion	5/12/2015	10/27/2015
Ellerslie	117	PBRA	02/2017	HUD approved certification of completion	10/26/2016	1/26/2017
Govans Manor	191	PBRA	11/216	HUD approved certification of completion	10/26/2016	1/26/2017
Heritage Crossing	75	PBRA	11/2018	HUD approved certification of completion	12/1/2017	6/29/2018

Property Name	# of Units Converted	RAD Conversion Type	Dated Closed	Major Milestone / Status	RAD Significant Amendment Submission Date*	RAD Significant Amendment Approval Date
Hillside Park	30	PBRA	12/2017	HUD approved certification of completion	12/1/2017	6/29/2018
Hollander Ridge	94	PBV	12/2021	Construction completed March 2021	7/1/2020	9/21/2020
Hollins House	130	PBRA	11/2015	HUD approved certification of completion	5/12/2015	10/27/2015
J. Van Story Branch Apts	350	PBRA	11/2018	HUD approved certification of completion	12/1/2017	6/29/2018
Lakeview Tower	302	PBRA	11/2015	HUD approved certification of completion	5/12/2015	10/27/2015
Laurens House	36	PBV	11/2025	Submitted financing plan	10/24/2022	1/19/2023
McCulloh Extension	347	PBRA	11/2016	HUD approved certification of completion	5/12/2015	10/27/2015
Monument East	170	PBRA	10/2018	HUD approved certification of completion	12/1/2017	6/29/2018
Perkins I	20	PBV 20 RAD PBV 28 PBV	06/2022	HUD approved certification of completion	9/17/2020	9/21/2020
Pleasant View Gardens Senior	110	PBRA	07/2016	HUD approved certification of completion	5/12/2015	10/27/2015
Pleasant View Gardens Townhomes	201	PBRA	09/2016	HUD approved certification of completion	5/12/2015	10/27/2015
Primrose Place	125	PBRA	02/2016	HUD approved certification of completion	5/12/2015	10/27/2015

Property Name	# of Units Converted	RAD Conversion Type	Dated Closed	Major Milestone / Status	RAD Significant Amendment Submission Date*	RAD Significant Amendment Approval Date
Rosemont Tower	203	PBRA	09/2019	HUD approved certification of completion	12/1/2017	6/29/2018
Scattered Sites (Thompson 58/Broadway Homes)	58	PBRA	05/2019	HUD approved certification of completion	4/12/2017	12/27/2017
Senior Townes at the Terraces	47	PBRA	11/2017	HUD approved certification of completion	10/26/2016	1/26/2017
Somerset Extension	57	PBRA	12/2020	HUD approved certification of completion	12/1/2017	6/29/2018
Somerset Ph 2	67	PBV	06/2021	HUD approved certification of completion	7/1/2020	9/21/2020
Somerset Ph 3	15	PBV	11/2021	HUD approved certification of completion	7/1/2020	9/1/2020
The Rosemont Low Rise Townhomes	106	PBRA	12/2022	HUD approved certification of completion	12/01/2017	12/27/2017
Townes at the Terraces	20	RAD/PBV Blend	08/2025	Projected Completion 2027	10/24/2022	1/19/2023
Union Ave. – Buena Vista Apartments	48	PBV Part II	10/2018	HUD approved certification of completion	6/20/2018	8/10/2018
Wyman House	168	PBRA	12/2015	HUD approved certification of completion	5/12/2015	10/27/2015

Property Name	# of Units Converted	RAD Conversion Type	Dated Closed	Major Milestone / Status	RAD Significant Amendment Submission Date*	RAD Significant Amendment Approval Date
Total	4,180					

The table below identifies projects that are anticipated to be converted under RAD in FY 2026 and future years. Future RAD Significant Amendments will be prepared and submitted per HUD required timelines. Please note that subject to financing and final HUD approval, the RAD conversion type may change.

Table 16: RAD Conversions Projected to Close in FY 2026 and Future Years

Property Name	RAD Units*	RAD Conversion Type	CHAP Received (Yes/No)	Major Milestones
Albemarle Square	130	RAD PBV or Blend of RAD PBV and PBV	No	RAD conversion is likely to take place after 2026
Albemarle Apartments	4	RAD PBV	No	RAD conversion is likely to take place after 2026
Dukeland	30	RAD PBV or Blend of RAD PBV and PBV	Yes	RAD conversion is likely to take place after 2026
McCulloh Homes	556	RAD PBV or Blend of RAD PBV and PBV	Yes	RAD conversion is likely to take place after 2026
O'Donnell Heights	230	RAD PBV or Blend of RAD PBV and PBV	No	RAD conversion is likely to take place after 2026
Poe Homes	288	RAD PBV or Blend of RAD PBV and PBV	Yes	Developer selected & MDA executed; Choice Neighborhood Transformation Plan submitted to HUD on 9/3/2020; HUD approved the Poe Transformation Plan on January 5, 2021. HABC

Property Name	RAD Units*	RAD Conversion Type	CHAP Received (Yes/No)	Major Milestones
				submitted demo/dispo application in 2023 and was approved in 2024.
Renaissance at Reservoir Hill	40	RAD PBV or Blend of RAD PBV and PBV	No	RAD conversion is likely to take place after 2026
Sharp Leadenhall	23	RAD PBV or Blend of RAD PBV and PBV	No	RAD conversion is likely to take place after 2026
TOTAL	1,301			

*Reflects only RAD PBV units and not other blended PBV units.

- 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

c

- 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.*

Appendix L:

- Albermarle Square – Flag House I & II: First RAD Significant Amendment
- O'Donnel Heights: First RAD Significant Amendment
- Dukeland: First RAD Significant Amendment
- Renaissance at Reservoir Hill: First RAD Significant Amendment

VI. Administrative

A. Board Resolution and Certification of Compliance

TO BE ATTACHED FOLLOWING PUBLIC COMMENT PERIOD AND BOARD RESOLUTION

B. Documentation of Public Process

TO BE ATTACHED FOLLOWING PUBLIC COMMENT PERIOD AND BOARD RESOLUTION

C. Planned & Ongoing Evaluations

HABC will continue to monitor and evaluate MTW activities during FY 2026. At this point, HABC does not intend to use external evaluators for new or ongoing MTW initiatives. Internal reports will be generated on a periodic basis to assess performance against proposed targets. Quarterly internal reviews are conducted with program staff and management to review and evaluate results and, if necessary, to modify proposed strategies to improve results. Annual evaluation results will be reported as appropriate by HABC in the MTW Annual Report.

D. Lobbying Disclosures

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

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

This section of the Annual Plan provides information on HABC's planned sources and uses of non-MTW HUD funds. This financial plan is compiled based on current data as of July 2025. It is subject to revision as conditions and/or assumptions change. This section includes a summary of HABC's planned non-MTW activities, i.e. activities that do not specifically require use of MTW Agreement authority in order to be implemented.

Planned Sources and Uses of Other HUD Funds

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

- Other HCV Programs include the HCV Veterans Affairs Supportive Housing, Moderate Rehabilitation, Family Unification, Non-elderly disabled, Emergency Housing Vouchers and Mainstream HCV programs.
- State and Local Programs
- HABC's forced account (HABCo)
- Planning and Development programs
- Partnership Rental Housing Programs (PRHP) market rate units
- Maintenance for Non-ACC properties
- Resident Service Grants

Estimated Sources of Non- MTW Funding for FY 2026

SOURCES	
FDS Line Item Name	Dollar Amount
Tenant Revenue	1,890,549
HUD PHA Operating Grants	16,660,540
Capital Grants	4,180,082
Total Fee Revenue	-
Interest Income	-
Gain or Loss on Sale of Capital Assets	-
Other Income	10,648,610
Total Revenue	33,379,781

Notes to Sources:

1. Total Tenant Revenue of \$1,890,549 is for PRHP market rate units managed by HABC's privatized firms.
2. HUD Operating Grants include the following:

- Housing Assistance Payments (HAP) subsidies planned for Other HCV programs in the amount of \$16,424,897
 - Ongoing Administrative Fees Earned estimated in the amount of \$235,643
3. Capital Grants includes:
- \$4,180,082 for CNI grant
4. Other Income includes the following:
- HABCo's construction and maintenance activities \$1,745,459.
 - Market rate activities \$11,880
 - City of Baltimore reimbursement of pass-through activities \$6,625,000.
 - Resident Services activities \$890,194
 - Planning & Development activities \$1,376,077

Estimated Uses of Non- MTW Funding for FY 2026

USES	
FDS Line Item Name	Dollar Amount
Total Operating – <i>Administrative</i>	3,349,979
Management Fee Expense	115,513
Allocated Overhead	416,638
Total Tenant Services	830,356
Total Utilities	390,748
Labor	-
Total Ordinary Maintenance	7,789,865
Total Protective Services	31,256
Total Insurance Premiums	656,602
Total Other General Expenses	77,499
Total Interest Expense and Amortization Cost	-
Total Extraordinary Maintenance	-
Housing Assistance Payments	16,424,897
Depreciation Expense	168,195

USES	
FDS Line Item Name	Dollar Amount
All Other Expenses	-
Total Expenses	30,251,548

Total Expenses	30,251,548
Less: Depreciation Expense	-168,195
Hard Cost	4,016,632
Non-MTW Uses of Funds	34,099,985

Uses of Fund exceed Sources of Fund by \$720,204 which will be supported by non-ACC reserves.

Notes to Uses:

- Administrative expenses include salaries and benefits to administer the Non-MTW programs. Also included in this expense category are office supplies, telephone, postage, and other computer materials and contracts.
- Allocated Overhead is calculated based on HUD's approved Local Asset Management Program since FY 2010. The proposed updated cost allocation calculations for CY 2026 are included in Appendix C.
- Tenant Services include salaries and benefits of employees for the Resident Services grants and includes other materials and services as required by the grant agreements.
- Ordinary Maintenance expenses are related to the City of Baltimore pass-through (non-capitalized activities being performed by HABC's force-labor department (HABCo). HABC receives reimbursement from the City for these activities, PRHP units, maintenance for HABC's non-ACC properties and maintenance of spaces occupied by Tenant Services grant personnel.
- Other General Expenses include PILOT, applicable portions of compensating absence for the non-MTW programs, bad debt and RFR for HABC's market rate units.
- Housing Assistance Payments (HAPs) include rent subsidies paid to landlords and utility assistance paid to tenants of Other HCV programs.

Appendix B: Local Asset Management Plan

HABC CY26 Indirect Cost Rate Explanation, A component of HABC's Local Asset Management Plan

This cost allocation plan and process for Calendar Year 2026 represents year fifteen 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, and
- 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, HCV, 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, Fiscal Operations, 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; and
- 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 2025 Approved Consolidated Budget. Based on this budget and the attached schedule, **the indirect cost rate for CY2026 will be 13.43% for MTW and 13.22% for non-MTW (see Attachment A for detail).**

Appendix B: Local Asset Management Plan (Attachment A)

Calculation of Indirect Cost Rate FY 2026

<i>Direct</i>	OFR <i>Treatment</i>	FY25	Change	Share	MTW	Non-MTW	OH Limit	OH shortfall
Sites (LIPH)	Dir	65,198,382	17.7%	11.9%	65,198,382			
Sites PVT	Dir	2,078,557	-52.6%	0.4%	2,078,557			
Sites (CFP hard-includes ECI)	Dir	16,195,137	4.3%	3.0%	16,195,137			
Sites (CFP soft - includes ECI)	Dir	3,193,977	-19.0%	0.6%	3,193,977			
Sites - Spec/Non-routine	Dir	-	0.0%	0.0%				
EPC Costs (Hard) (Loan)	Dir	-	0.0%	0.0%		-		-
EPC Soft (Loan)	Frontline	-	0.0%	0.0%	-	-	-	
Crews	COCC	4,054,192	45.1%	0.7%	4,054,192			
HCVP HAP	Dir	301,750,887	-6.0%	55.3%	288,451,237	13,299,650		
Non-HAP Hard		76,000,000	0.0%	13.9%	76,000,000			
Non HAP Soft		-	0.0%	0.0%	-			
HCVP Admin	Dir	15,965,345	30.4%	2.9%	15,812,675	152,670		
BRHP Admin		6,638,449	8.5%	1.2%	6,638,449			
Development Hard/HOPE VI	Dir	3,740,395	17.6%	0.7%		3,740,395		
Development Soft	Mixed	2,185,759	-10.5%	0.4%		2,185,759		
DHCD Hard	Dir	-	-100.0%	0.0%		-		
DHCD Soft	Mixed	8,375,000	0.0%	1.5%		8,375,000		-
Other Non-MTW		406,104	233.4%	0.1%		406,104		
RAB	Dir	185,489	0.0%	0.0%	185,489			
Res Serv - LIPH	Frontline	2,753,696	15.2%	0.5%	2,753,696			
Res Serv - Grants	Frontline	2,171,718	56.0%	0.4%		2,171,718	217,172	30,369
Facilities Non ACC Properties		200,000	0.0%	0.0%		200,000		
Energy	Frontline	899,242	-0.5%	0.2%	899,242			
F&A Frontline		87,153	2.0%	0.0%	87,153			
FHEO Front Line		112,683	17.0%	0.0%	112,683			
HABCO Hard	Dir	-	0.0%	0.0%	-			
HABCO Soft	Frontline	1,434,254	2.4%	0.3%		1,434,254		
Admissions & Leasing	Frontline	1,775,970	0.7%	0.3%	1,775,970			
Housing Management	Frontline	2,270,513	-31.2%	0.4%	2,270,513			
Home Ownership	Frontline	463,568	281.3%	0.1%	463,568			
Legal, Lease enforcement	Frontline	-	0.0%	0.0%				
MPA	Frontline	1,183,847	1.5%	0.2%	1,183,847			
Private Management Operations	Frontline	1,442,161	0.0%	0.3%	1,442,161			
Strategy & Compliance	Frontline	635,900	0.0%	0.1%	635,900			
Relocation	Frontline	521,488	4.3%	0.1%	521,488			
Security Operations	Frontline	393,540	0.0%	0.1%	393,540			
Work Order Ctr.	Frontline	-	0.0%	0.0%	-			
Fund 113	Dir	1,901,401	13.0%	0.3%		1,901,401		
Undesignated/Legacy	Frontline	5,837,383	-9.7%	1.1%	5,837,383			
Legal FL	Frontline	-	0.0%	0.0%				
Less AMP/FL planned cuts	FL/Dir	-	0.0%	0.0%	-			
Subtotal Direct		530,052,191	17.3%	97.1%	496,185,240	33,866,952	217,172	30,369

Appendix B: Local Asset Management Plan (Attachment A)

Calculation of Indirect Cost Rate FY 2026 (cont'd)

<u>Less: Non-Relevant Expenses</u>								
Hard Cost (Devel, HABCO, Non HAP)	95,935,532	412.6%		92,195,137	3,740,395			
HAP	301,750,887	-6.0%		288,451,237	13,299,650			
BRHP	6,638,449	8.5%		6,638,449	-			
Development Soft	-	0.0%						
ORS Grants	-	-100.0%			-			
Debt Service	-	0.0%		-				
Facilities	-	-100.0%		-	-			
Fund 113	-	0.0%			-			
DHCD Hard cost	-	-100.0%		-	-			
RAD Deduct (out in 20) *	-	0.0%			-			
Subtotal Direct	125,727,323	24.0%		108,900,417	16,826,906	217,172	30,369	
				87%	13%			
								Total Program Cost
		Change		MTW Direct	Non-MTW Dir	MTW Indir	Non-MTW Ind	(Direct + Indirect)
Low Rent	89,893,764	12.8%		89,893,764	-	12,076,452	-	101,970,216
CFP/RHF	3,193,977	-19.0%		3,193,977	-	428,004	-	3,621,981
HCVP	15,965,345	30.4%		15,812,675	152,670	2,118,955	20,458	18,104,758
Non-HAP Soft	-	0.0%		-	-			
Devel	2,185,759	-10.5%		-	2,185,759	-	292,899	2,478,658
HABCO	1,434,254	2.4%		-	1,434,254		192,195	1,626,449
DHCD	8,375,000	0.0%			8,375,000	-	1,122,280	9,497,280
Grants/Other	2,777,822	0.0%		-	2,777,822	-	217,172	2,994,994
EPC	-	0.0%		-	-	-	-	-
Biz Activities	1,901,401	13.0%		-	1,901,401	-	254,795	2,156,196
	125,727,323	21.3%		108,900,417	16,826,906	14,623,411	2,099,799	142,450,533

Appendix B: Local Asset Management Plan (Attachment A)

Calculation of Indirect Cost Rate FY 2026 (cont'd)

<i>Indirect</i>							
Admin Services	COCC	361,960	-4.1%	0.1%			
Audits	COCC		0.0%	0.0%			
Budgets	COCC	794,013	19.2%	0.1%			
CAO	COCC	338,134	-4.1%	0.1%			
CFO	COCC	343,221	43.1%	0.1%			
Agency Wide	COCC		0.0%	0.0%			
Communications	COCC	1,449,836	5.6%	0.2%			
COO	COCC	439,900	-23.0%	0.1%			
CEO	COCC	1,099,195	43.5%	0.2%			
Facilities/Bldg. Support	COCC	1,358,209	9.2%	0.2%			
FHEO	COCC	666,127	2.0%	0.1%			
Finance & Accounting	COCC	1,559,479	2.9%	0.3%			
HousingStat	COCC		0.0%	0.0%			
Human Resources	COCC	1,897,913	1.6%	0.3%			
IT	COCC	2,910,084	14.2%	0.4%			
Legal - investigations	COCC	730,692	13.2%	0.1%			
Legal - attorneys	COCC	1,964,340	7.3%	0.3%			
P&D	COCC		0.0%	0.0%			
Procurement	COCC	934,804	27.3%	0.2%			
Anticipated BAHD Chargebacks		-	0.0%	-0.1%			
Legacy costs	COCC	-	0.0%	0.0%			
5% Salary Addback	COCC		0.0%				
Anticipated cuts COCC	COCC		0.0%				
Subtotal Indirect		16,847,907	7.5%	2.9%	14,593,042	2,254,865	
Indirect Rate		13.40%					
Program totals (Dir + Ind)		142,575,230	21.9%				
Indirect Cost Rate (I/D) - blended				13.4%	13.40%	13.40%	
TOTAL		546,900,098	17.0%	100.0%	510,778,282	36,121,817	
<i>Reallocation of non-allocable overhead</i>					94%	7%	
					30,369	(30,369)	
Total Indirect Charges		16,847,907	7.5%	2.9%	14,623,411	2,224,496	
Total Program Indirect Rate					13.43%	13.22%	
Tot Exp. per Sources and Uses File		546,927,946					
Overall Proof		546,900,098					
Anticipated cuts		-					
Variance		27,847					
Final Variance		27,847	0.0%				

Appendix C: Asset Management Table

Property Name & AMP	ACC Units	Note for FY 2026 Plan	Development Activities	Demolition/ Disposition Activities*	Conversion Activities
Conventional Public Housing					
Brooklyn Homes MD002000021	482	Feasibility analysis underway to determine next steps for redevelopment/rehabilitation plan.	Brooklyn Day Care center is being renovated as a multi-purpose center to support community activities and resident enrichment		
Cherry Hill Homes MD002000011	1,281	Feasibility analysis underway to determine next steps for redevelopment/rehabilitation plan.	Engaged consultant to access the feasibility of potentially utilizing CNI funds for future redevelopment efforts		
Douglass Homes MD002000005	387	Feasibility analysis underway to determine next steps for redevelopment/rehabilitation plan.			
Gilmor Homes MD002000006	548	Feasibility analysis underway to determine next steps for redevelopment/rehabilitation plan.			
Latrobe Homes MD002000001	669	Feasibility analysis underway to determine next steps for redevelopment/rehabilitation plan.			
McCulloh Homes MD002000002	556	Feasibility analysis underway to determine next steps for redevelopment/rehabilitation plan.	Possible modernization, rehabilitation with capital funds Possible PBV RAD and/or PBV blend conversion		
O'Donnell Heights MD002000009	230	Prior tax credit applications submitted for Keys Pointe Phase II. Phase IIA closed on 7/9/25.	Phase IIA has 30 PBV units for eligible, current and returning residents.	HABC submitted demo application on 2/13/25. HUD approved demo application for the remaining 230 units on 7/22/25.	
Poe Homes MD002000004	288		Planned PBV RAD and/or PBV blend conversion. Demolition planned for 2026 with future mixed-income development.	HUD approved for demo/dispo application.	

Property Name & AMP	ACC Units	Note for FY 2026 Plan	Development Activities	Demolition/ Disposition Activities*	Conversion Activities
Westport Homes MD002000022	252	Feasibility analysis underway to determine next steps for redevelopment/rehabilitation plan.		Demolition of old daycare building	
Mixed Developments w/HABC-Owned ACC Units					
Albert Spencer	20	Complete renovation of all 20 units in 2025	Planned modernization, rehabilitation with MTW funds		
Barclay MD002000121	53				
CHM	13				
Monastery Gardens MD002000102	11				
Montpelier Apartments MD002000104	13				
Oswego Mall	35			HABC submitted demolition application to HUD. Pending approval.	
Shipley Hills	24		No redevelopment plans.	HUD approved demo application.	
St. Ambrose MD002000116	30				
West Hills Square MD002000113	11				
Scattered Sites					
Scattered Sites 200 MD002000200	192	Renovation of the following units in Johnson Square: E. Biddle St.: 916; 918 (Units 1 & 2); 928; 930; 932; 940; 1002; 1021; 1027 E. Chase St.: 801; 823 (Units A & B); 825; 837; 947 E. Eager St.: 1202; 1208; 1216; 1236 Greenmount Ave.: 1209; 1211; 1225; 1227; 1229; 1231; 1233 Mura St.: 713; 715; 727	Planned modernization is underway for 16 of the 50 units in Johnston Square utilizing MTW funds. Continue rehab of remaining units into 2026, evaluate inventory as units become vacant.	Demo/Disposition of nonviable scattered sites units determined via unit inspection and neighborhood assessment.	Conversion of nonviable units into recreational space or for economic development purposes

Property Name & AMP	ACC Units	Note for FY 2026 Plan	Development Activities	Demolition/ Disposition Activities*	Conversion Activities
		E. Preston St.: 721; 735; 740 (Units A & B); 742 (Units A & B); 749; 800 (Units 1&2); 802 (Units 1 & 2); 804; 824; 832 (Units 1 & 2); 838 (Units 1, 2 & 3); 907; 909; 1013 Valley St.: 1030; 1217; 1229; 1231			
Scattered Sites 201 MD002000201	158		Continue rehab of viable vacant units, evaluate inventory as units become vacant	Demo/Disposition of nonviable scattered sites units determined via unit inspection and neighborhood assessment.	Conversion of nonviable units into recreational space or for economic development purposes
Scattered Sites 202 MD002000202	213	Intent to RAD 59 units as part of HABC's RAD III and RAD IV conversions Lauren's House and Carey House make up the 59 units	Continue rehab of viable vacant units, evaluate inventory as units become vacant	Demo/Disposition of nonviable scattered sites units determined via unit inspection and neighborhood assessment.	Conversion of nonviable units into recreational space or for economic development purposes
Scattered Sites 203 MD002000203	286		Continue rehab of viable vacant units, evaluate inventory as units become vacant	Demo/Disposition of nonviable scattered sites units determined via unit inspection and neighborhood assessment.	Conversion of nonviable units into recreational space or for economic development purposes
Scattered Sites 204 (Albemarle) MD002000204	4	Four family units 1135, 1143, 1145 and 1147 East Baltimore Street.	Intent to RAD all four units as part of HABC's RAD conversion		
Scattered Sites 205 (Bailey) MD002000205	34	34 family units	Continue rehab of viable vacant units, evaluate inventory as units become vacant.		
Scattered Sites 206 (Preston St.) MD002000206	9	Nine family units Rehabilitation of 836 Preston St. Units 1, 2 & 3 in Johnston Square.	Planned modernization, rehabilitation of Johnston Square units with MTW funds. Continue rehab of viable vacant units, evaluate inventory as units become vacant		

Property Name & AMP	ACC Units	Note for FY 2026 Plan	Development Activities	Demolition/ Disposition Activities*	Conversion Activities
Scattered Sites 208 (The Bailey 10) MD002000208	5	Units will become part of the scattered sites inventory and operated as conventional public housing	Acquire five additional units to satisfy the Bailey consent decree. Complete rehabilitation of two previously acquired units.		
Thompson 22 MD002000123	22	TBD			
Midtown Apartments MD002000103	35	Nonviable units have been identified, and HABC is in the process of submitting replacement units to the State	Continue rehab of viable vacant units, evaluate inventory as units become vacant		
Uptown Apartments MD002000108	33	Nonviable units have been identified, and HABC is in the process of submitting replacement units to the State	Continue rehab of viable vacant units, evaluate inventory as units become vacant		
Stricker Street Apartments	25	Nonviable units have been identified, and HABC is in the process of submitting replacement units to the State	Continue rehab of viable vacant units, evaluate inventory as units become vacant		
RAD Conversions**					
Albemarle Square	130	Planning for RAD Conversion after 2025	Planned Rehabilitation utilizing a Section 18 RAD PBV/TBV Blend.	Section 18 Disposition.	Section 18 RAD PBV/TBV Blend.
Arbor Oaks	206	Planned RAD Section 18 Blend conversion in 2025. 55 RAD PBV and 7 PBV.	Planned Rehabilitation utilizing a Section 18 RAD PBV/TBV Blend. Projected financial closing in 4 th quarter of 2025.	Section 18 Disposition.	Section 18 RAD PBV/TBV Blend.
Carey House	23	Planning for RAD Conversion on/or before 2026	Planned conversion to RAD PBV		RAD PBV Conversion
Dukeland	30	Planning for RAD Conversion in 2026.	Planned conversion to RAD PBV.		RAD PBV Conversion
Laurens House	36	Planning for RAD Conversion on/or before 2026	Planned conversion to RAD PBV.		RAD PBV Conversion
Perkins Homes	493		Seven of the nine CNI housing Phases have closed.	Planned Section 18 Disposition.	

Property Name & AMP	ACC Units	Note for FY 2026 Plan	Development Activities	Demolition/ Disposition Activities*	Conversion Activities
			Five of the phases are completed and leased.		
Renaissance at Reservoir Hill	40	Planned conversion to RAD PBV/TBV Blend in 2026.	Planned rehabilitation using MTW Funds.	Planned Section 18 Disposition.	RAD PBV Conversion
Sharp Leadenhall	23	Planned Section 18 Blend RAD Conversion in 2026.	Planned rehabilitation using MTW Funds. Plan conversion to RAD PBV	Planned Section 18 Disposition.	RAD Section 18 Blend Conversion
Townes at the Terraces	202	Planned RAD Section 18 Blend conversion in 2025. 182 RAD PBV and 20 PBV	Planned Rehabilitation utilizing a Section 18 RAD PBV/TBV Blend. Projected financial closing in 4 th quarter of 2025.	Section 18 Disposition.	Section 18 RAD PBV/TBV Blend.

*Includes properties that may be disposed of through the homeownership program.

**Properties that have already been converted to PBV or PBRA under RAD are not included in this table.

Appendix D: Board Resolution

TO BE ATTACHED FOLLOWING PUBLIC COMMENT PERIOD AND BOARD RESOLUTION

Appendix E: Certification of Compliance

TO BE ATTACHED FOLLOWING PUBLIC COMMENT PERIOD AND BOARD RESOLUTION

Appendix F: Certification of Consistency with Consolidated Plan

TO BE ATTACHED FOLLOWING PUBLIC COMMENT PERIOD AND BOARD RESOLUTION

Appendix G: Public Process Documentation

TO BE ATTACHED FOLLOWING PUBLIC COMMENT PERIOD AND BOARD RESOLUTION

Appendix H: Comments Received on the FY 2025 Plan

TO BE ATTACHED FOLLOWING PUBLIC COMMENT PERIOD AND BOARD RESOLUTION

Appendix I: Attendee Sign-In Sheets

TO BE ATTACHED FOLLOWING PUBLIC COMMENT PERIOD AND BOARD RESOLUTION

Appendix J: Lobbying Activities (SF-LLL) Form

TO BE ATTACHED FOLLOWING PUBLIC COMMENT PERIOD AND BOARD RESOLUTION

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

TO BE ATTACHED FOLLOWING PUBLIC COMMENT PERIOD AND BOARD RESOLUTION

Appendix L: RAD Significant Amendments

New RAD Significant Amendments

For the Albermarle Square, Flag House I, and Flag House II Rental Assistance Demonstration (RAD) project located in Baltimore, the Housing Authority of Baltimore City certifies that the site complies with all site selection requirements applicable to Project Based Voucher (PBV) RAD projects, including:

1. The site is suitable from the standpoint of facilitating and furthering full compliance with the applicable provisions of Title VI of the Civil Rights Act of 1964, Title VIII of the Civil Rights Act of 1968, Executive Order 11063, and HUD regulations issued pursuant thereto; and,
2. In conducting its review of site selection for the proposed project, HABC completed a review with respect to accessibility for persons with disabilities and that the proposed site is consistent with applicable accessibility standards under the Fair Housing Act, Section 504, and the ADA.

Name of Public Housing Development	PIC Development ID	Conversion Type	Transfer of Assistance
Albermarle Square – Flag House I & II	MD002000114	RAD PBV or RAD/Section 18 Blend of PBV & Tenant Protection Vouchers (Construction Blend)	None
Pre-Conversion Total Units	Pre-RAD Unit Type	Post-RAD Unit Type	Capital Fund Allocation
130 Units	Family	Family	\$280,685
Bedroom Type	Number of Pre-RAD Units	Number of Post-RAD Units	Changes in Units and Why
Studio	0	0	
1-Bedroom	12	12	None
2-Bedroom	33	33	None
3-Bedroom	76	76	None
4-Bedroom	9	9	None
5-Bedroom	0	0	
6-Bedroom	0	0	
Transfer of Assistance:	No		

For the O'Donnell Heights Rental Assistance Demonstration (RAD) project located in Baltimore, the Housing Authority of Baltimore City certifies that the site complies with all site selection requirements applicable to Project Based Voucher (PBV) RAD projects, including:

1. The site is suitable from the standpoint of facilitating and furthering full compliance with the applicable provisions of Title VI of the Civil Rights Act of 1964, Title VIII of the Civil Rights Act of 1968, Executive Order 11063, and HUD regulations issued pursuant thereto; and,
2. In conducting its review of site selection for the proposed project, HABC completed a review with respect to accessibility for persons with disabilities and that the proposed site is

consistent with applicable accessibility standards under the Fair Housing Act, Section 504, and the ADA.

Name of Public Housing Development	PIC Development ID	Conversion Type	Transfer of Assistance
O'Donnell Heights	MD002000009	RAD PBV or RAD/Section 18 Blend of PBV & Tenant Protection Vouchers (Construction Blend)	None
Pre-Conversion Total Units	Pre-RAD Unit Type	Post-RAD Unit Type	Capital Fund Allocation
230	Family	Family	\$734,285
Bedroom Type	Number of Pre-RAD Units	Number of Post-RAD Units	Changes in Units and Why
Studio	0	0	
1-Bedroom	0	0	
2-Bedroom	220	220	None
3-Bedroom	10	10	None
4-Bedroom	0	0	
5-Bedroom	0	0	
6-Bedroom	0	0	
Transfer of Assistance:	No		

For the Dukeland Rental Assistance Demonstration (RAD) project located in Baltimore, the Housing Authority of Baltimore City certifies that the site complies with all site selection requirements applicable to Project Based Voucher (PBV) RAD projects, including:

1. The site is suitable from the standpoint of facilitating and furthering full compliance with the applicable provisions of Title VI of the Civil Rights Act of 1964, Title VIII of the Civil Rights Act of 1968, Executive Order 11063, and HUD regulations issued pursuant thereto; and,
2. In conducting its review of site selection for the proposed project, HABC completed a review with respect to accessibility for persons with disabilities and that the proposed site is consistent with applicable accessibility standards under the Fair Housing Act, Section 504, and the ADA.

Name of Public Housing Development	PIC Development ID	Conversion Type	Transfer of Assistance
Dukeland	MD002000031	RAD PBV	None
Pre-Conversion Total Units	Pre-RAD Unit Type	Post-RAD Unit Type	Capital Fund Allocation
30	Family	Family	\$121,151
Bedroom Type	Number of Pre-RAD Units	Number of Post-RAD Units	Changes in Units and Why
Studio	0	0	
1-Bedroom	0	0	
2-Bedroom	0	0	
3-Bedroom	15	15	None

4-Bedroom	10	10	None
5-Bedroom	5	5	None
6-Bedroom	0	0	
Transfer of Assistance:	No		

For the Renaissance at Reservoir Hill Rental Assistance Demonstration (RAD) project located in Baltimore, the Housing Authority of Baltimore City certifies that the site complies with all site selection requirements applicable to Project Based Voucher (PBV) RAD projects, including:

1. The site is suitable from the standpoint of facilitating and furthering full compliance with the applicable provisions of Title VI of the Civil Rights Act of 1964, Title VIII of the Civil Rights Act of 1968, Executive Order 11063, and HUD regulations issued pursuant thereto; and,
2. In conducting its review of site selection for the proposed project, HABC completed a review with respect to accessibility for persons with disabilities and that the proposed site is consistent with applicable accessibility standards under the Fair Housing Act, Section 504, and the ADA.

Name of Public Housing Development	PIC Development ID	Conversion Type	Transfer of Assistance
Renaissance at Reservoir Hill	MD002117	RAD PBV or RAD/Section 18 Blend of PBV & Tenant Protection Vouchers (Construction Blend)	None
Pre-Conversion Total Units	Pre-RAD Unit Type	Post-RAD Unit Type	Capital Fund Allocation
40	Family	Family	\$83,452
Bedroom Type	Number of Pre-RAD Units	Number of Post-RAD Units	Changes in Units and Why
Studio	0	0	
1-Bedroom	12	12	None
2-Bedroom	9	9	None
3-Bedroom	13	13	None
4-Bedroom	5	5	None
5-Bedroom	0	0	
6-Bedroom	1	1	None
Transfer of Assistance:	No		

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

- Changes to the Capital Fund budget produced as a result of each approved RAD conversion regardless of whether the proposed conversion will include use of additional Capital Funds;
- Decisions to apply MTW funding or programmatic flexibility to post-conversion RAD developments;

- Decisions or changes related to the ownership and/or financing structures for each approved RAD conversion including decisions to allocate HABC financial resources as a source of funds to support the RAD conversion initiatives;
- Changes to the construction and rehabilitation plans and scheduled for each approved RAD conversion;
- Changes to the project names or sponsor entity names;
- With respect to Faircloth to RAD conversions, decisions to reduce or increase the number of subsidized units;
- Changes in the post-conversion bedroom size distribution and/or the number of de minimis unit reductions up to the 5% permitted under RAD program rules;
- Changes to the pre-conversion bedroom size distribution and/or the project or AMP from which transfer of assistance units will be converted; and,
- Decisions to change the conversion subsidy to either Project Based Vouchers or Project Based Rental Assistance.