



**MTW** Moving  
to Work

FY **25**

2025 Annual Plan





## **Moving to Work Annual Plan**

**Fiscal Year 2025**

**Submission to HUD: October xx, 2024**

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**Housing Authority of Baltimore City**  
**Moving to Work Annual Plan – Fiscal Year 2025**

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## I. Introduction and Overview

This Moving to Work (MTW) Annual Plan provides information on the initiatives and strategies to be undertaken by the Housing Authority of Baltimore City (HABC) under the MTW Demonstration Program in Fiscal Year (FY) 2025, i.e., the period from January 1, 2025 through December 31, 2025.

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 2025. In view of the uncertainty regarding available funding, the planned activities detailed in the MTW Annual Plan are subject to modification based on final funding levels.

### A. Background on the MTW Demonstration

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

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

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

For purposes of this Annual Plan, an "MTW activity" is defined as any activity that requires MTW flexibility to waive statutory or regulatory requirements. The MTW activities to be undertaken by

HABC in Fiscal Year 2025 are all designed to promote one or more of the MTW statutory objectives.

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

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

HABC's Strategic Plan, "Pathways to Success," was published in 2019 to provide a framework and set priorities designed to support our mission, vision and goals. Over the past five years, HABC has worked diligently to accomplish the goals and priorities set forth in the Plan. A dashboard was created and posted on our website to track our progress on specific action items and to show the status of Plan implementation. In 2024, over 70% of the recommendations outlined have been achieved. HABC has begun the process of updating our Strategic Plan to reflect this progress and build upon the priorities that were established. The updated Plan will serve as our guide towards expanding and implementing both short and long-term objectives. Specific initiatives that HABC will focus on include:

- Continuing efforts to create and preserve affordable housing
  - Closing and completing all Phases of the Perkins Somerset Transformation Plan; continuing the implementation of Transform Poe and the Neighborhood Revitalization Plan for O'Donnell Heights; completing planned RAD conversions.
  - Continuing to address capital needs and identifying strategies to redevelop or rehabilitate conventional public housing and scattered sites.
  - Preserving housing affordability through Baltimore Affordable Housing Development, Inc. (BAHD).
- Strengthening our internal operations and professional development of our staff
  - Operating more effectively with business infrastructure and technology upgrades, including automated processes and performance tracking.
  - Supporting long-term sustainability of the agency through transition and succession planning.
  - Investing in staff training and development to create opportunities for staff advancement.
- Providing opportunities and support for our residents
  - Seeking new funding and resources to support our resident services programs.
  - Implementing the Get Ready for Opportunities to Work (GROW) programs and helping residents achieve economic mobility.
  - Providing homebuyer readiness training and other homeownership opportunities.

- Strengthening resident leadership through continued engagement with our RAB and Tenant Council members.
- Increasing housing choice
  - Continuing to offer incentives for landlord participation in the Housing Choice Voucher Program and review ways to increase voucher utilization
  - Updating our rental housing market study to identify targeted areas in Baltimore City where higher payment standards can be used.
  - Advocating for funding to preserve current initiatives and exploring new programs to expand the reach of the affordable housing assistance and services that we provide.

In addition to our Strategic Plan update, HABC has engaged in an analysis to study the economic impact that the agency's programs, operations, housing assistance and construction activities has had over the last several years. We look forward to seeing our current initiatives come to fruition and building upon the opportunities and investment that HABC brings to the communities we serve.

### **C. MTW Goals and Objectives for Fiscal Year 2025**

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 2025.

#### **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 date for HOTMA provisions is still unclear due to delays in implementation related tasks.

HUD approved HABC's 2024 MTW Plan which included 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 provides the following regarding administration of the vouchers:

- BRHP will administer services for all HABC voucher holders who are exercising portability within the BRHP services area. Administration of the HABC Portability Households will be in accordance with BRHP's Administrative Plan.
- BRHP will transfer administration of the remaining twenty-five (25) *Thompson* PCD Homeownership Units to HABC. HABC will administer the vouchers in accordance with its HCV Administrative Plan.

BRHP will also transition approximately 375 BRHP leased vouchers to HABC. After initially leasing in BRHP managed Opportunity Neighborhoods, these BRHP families moved to Baltimore City, outside of Opportunity Neighborhoods, and have remained for at least two years. They have indicated the desire to remain in Baltimore City. As a result of the transition of the vouchers to HABC, BRHP will be able to issue 375 vouchers to families from its waiting list who wish to lease units in Opportunity Neighborhoods.

### New Activities

#### Affordable Housing Preservation Activity

HABC will utilize MTW Block Grant funds to support the preservation of affordable rental housing units through implementation of a new 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 less than 80% of Area Median Income. Proposed revitalization efforts in FY 2025 include seven developments which were originally funded with state provided capital funds under the Partnership Rental Housing Program. AHP funds used be used for repairs and improvements to ensure that all units meet HQS standards. Two hundred and five units are slated for revitalization under this activity in FY 2025.

### 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 2025. Detailed information on the changes can be found in each specific activity section of the Plan.

- Streamlined Admission and Recertification and Rent Simplification: In FY 2025 HABC will remove its HCV policy whereby interim rent decreases are not processed if the decrease in income will last less than 30 days. HABC will apply its HCV MTW policies to BRHP



vouchers which are transitioning to HABC administration. Finally, until HOMTA changes have been implemented, HABC will waive the requirement to run EIV at interim certifications.

- **Family Self Sufficiency (FSS) Program Enhancements:** In conjunction with HABC's Get Ready for Opportunities to Work (GROW) program, which is slated for implementation in FY 2025, HABC will update its FSS Contracts of Participation for consistency with GROW program requirements. Additionally, HABC anticipates implementing its Tiered Income Escrow Model in FY 2025.
- **Modified Rent Reasonableness & Rent Cap Policy:** HABC will contract with AREA rents in 2025 to complete an updated Market Study to better inform the reasonable rent determination process.
- **Rent Simplification:** HABC will implement changes to the Rent Simplification activity to better serve HCV families. Specifically, HABC will honor any payment standard increases which occur between submission of a completed leasing packet and actual lease up. This policy applies to new admissions and moves. Additionally, when a contract rent increase is processed between regular recertifications, HABC will update the payment standard if it has increased; however, no change will be made if the payment standard has decreased.

To prevent financial hardship as a result of the transition of vouchers from BRHP to HABC administration, HABC will apply BRHP deduction policies to the 375 families impacted by this change. HABC will apply its remaining, applicable Administrative Plan and MTW plan policies to these transitioning families.

- **MTW Homeownership Program:** HABC will implement some changes to the homeownership program to better ensure family success and to provide a reinstatement option under certain circumstances when family income drops
- **Leasing Incentive Program:** HABC will no longer provide a leasing incentive for units which have been substantially rehabilitated. The incidence of these units was low and the administrative burden to verify the rehab was great.

## **Public Housing**

**Occupancy:** HABC projects that 5,655 households will be served in FY 2025, 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 2025, HABC projects that it will expend approximately \$20 million on capital projects.
- **Get Ready for Opportunities to Work (GROW):** HABC received HUD approval on this activity in FY 2024; however, implementation is planned for FY 2025. HABC is committed to expanding access to employment, training, and educational opportunities for HABC residents while also promoting economic self-sufficiency. The GROW program is a new program designed to build on and enhance HABC's self-sufficiency initiatives. 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. This activity applies to Public Housing participants only.

### Housing Choice Voucher Program

- **Voucher Utilization:** HABC projects that, on average, it will have 18,726 MTW units under lease each month, including Thompson vouchers.
- **Project-Based Voucher Utilization:** HABC projects that 3,649 housing units will be under contract in the Project-Based Voucher (PBV) program by the end of FY 2025, including 251 new planned units to be placed under contract during the fiscal year.

### 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 from MOHS and partner agencies. Of the 900 set aside vouchers, 230 have been set aside 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, 866 vouchers have been issued and of those 866, 38 are in the housing search process. In FY 2025 HABC anticipates full utilization of all 900 set-aside vouchers.

- **The Project-Based Homeless and Veterans Set Asides:** In FY 2025, 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 2025 HABC anticipates that all 250 vouchers will be leased. Vouchers are generally issued upon receipt of applicable referrals. To date, 191 vouchers have been leased and 27 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 35 RAD developments, consisting of 4,624 units by the end of FY 2025. 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. The discussion of planned unit counts, timetables, development financing and other details is preliminary and is subject to change.

- **Perkins Somerset Oldtown:** HABC and the City of Baltimore were awarded a \$30 million Choice Neighborhood (CN) grant in July 2018 to support the Perkins Somerset Oldtown (PSO) Transformation Plan and a subsequent \$10 million supplemental Choice grant. The Plan includes the demolition of 629 former public housing units and the creation of 1,353 new, phased mixed-income housing units spread across the former Somerset and Perkins Homes public housing sites and one adjacent property formerly owned by the Mayor and City Council of Baltimore. The 1,353 units include 629 replacement units; 294 market rate units and 430 Low-Income Housing Tax Credit (LIHTC) units. HABC received HUD approval to convert all 629 LIHTC units under RAD.

The former Perkins Homes site is being redeveloped in five phases. Perkins Phase 1 consists of 103 units including 10 market rate units, 45 LIHTC units and 48 CN Replacement units (20 RAD & 28 PBV units).

Perkins Phase 2A and 2B are under construction. Phase 2A consists of 89 units including 28 market rate, 11 LIHTC and 50 CN replacement units (PBVs). Perkins Phase 2A is projected to be completed on/before September 2024. Perkins Phase 2B consists of 67 units including 12 market rate units, 29 LIHTC units and 26 CN replacement units (PBV). Perkins Phase 2B is projected to be complete in/before Q4 2024.

Perkins Phase 3 is under construction and consists of 152 units including 33 market rate unit, 48 LIHTC units, and 71 CN replacement units (PBV).

Perkins Phase 4 is projected to close on/before Q4 2024 and consists of 154 units including 40 market rate units, 36 LIHTC units and 78 CN replacement units (PBV). Perkins Phase 5 is projected to close on/before Q2 2025 and consists of 230 units including 62 market rate units, 64 LIHTC units and 104 CN replacements units (PBV).

The redevelopment of Perkins Square also includes construction of a new community park, new school, and public streets, resulting in a more pedestrian-friendly community.

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

The former Somerset Homes site will be redeveloped in four phases. Somerset Phase 1 is complete and consists of 104 units including 20 market rate units, 34 LIHTC units and 50 CN replacement units (PBV).

Somerset Phase 2 (The Ella) is completed and consists of 192 units including 32 market rate units, 60 LIHTC units and 100 CN replacement units (67 RAD & 33 PBV).

Somerset Phase 3 (The Ruby) is completed and consists of 72 units including 20 market rate units, 16 LIHTC units and 36 CN replacement units (15 RAD & 21 PBV). Somerset Phase 4 (the Blake) consists of 190 units including 37 market rate units; 87 LIHTC units and 66 CN replacement units (PBV). It is anchored by a new grocery store and projected to close by year-end 2024.

- **O'Donnell Heights:** The O'Donnell Heights public housing development was constructed in 1942 and included 900 public housing units. Of the original count, 670 have been demolished. On July 12, 2024, HABC submitted a demolition application to HUD for the remaining 230 units.

The redevelopment of O'Donnell Heights is to be completed in four housing phases, with some sub-phases. The developer has completed Key's Pointe Phases 1A & 1B which are comprised of 144 total affordable units.

The Neighborhood Revitalization Plan for the O'Donnell Heights community was approved by the Baltimore City Planning Commission. HABC's development team submitted Key's Pointe Phase 2A's 4% Low-Income Housing Tax Credit application on March 31, 2023; HABC submitted a disposition application to HUD in July 2024; and it is expected to close on/before Q1 2025.

- **Poe Homes:** HABC received a \$1.3 million HUD Choice Neighborhood Planning & Action Activities Grant in September 2018 to support the planning of a viable mixed-income redevelopment strategy for Poe Homes. Poe Homes consists of 288 public housing units that will likely be converted to PBV and/or PBV/RAD blend. HUD approved the demolition/disposition application in July 7, 2023. HABC's relocation plan is in progress. Poe Homes Phase I includes 108 units on adjacent HABC owned, off-site parcel. It is anticipated that the developer will submit a 4% LIHTC application in 2025.

The other component of the Choice Neighborhood grant was for the following Action Activities related to capital improvement in the Poppleton and Hollins Market neighborhoods near Poe home:

- Action Activity 1: Greater Model Park – new Splash Pad. HABC continues to work collaboratively with Baltimore City’s Parks and Recreation to release \$170,000 prior to September 2024 expenditure deadline.
- Action Activity 2: Residential Façade/Aging-In-Place Program for existing low-income homeowners in the Poppleton/Hollins Market neighborhoods is completed. \$80,000 funded.
- Action Activity 3: Hollins Market tenant improvements were completed. \$350,000 funded.
- Action Activity 4: Lighting. Completed. \$200,000 funded.
- Action Activity 5: Grocery Store Initiative. HABC forwarded funds to the Baltimore Development Corporation for the grocery equipment. \$150,000 funded.

### 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 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 2024, HABC has acquired five of the ten Bailey units. Three of the acquired units are occupied and the fourth and fifth unit are completed and will be occupied on/before year-end 2024. In FY 2025, HABC will continue to vet listings and search for units that are within the established TDC thresholds. HABC projects acquiring two additional units in FY 2025 which will bring the total units purchased under this activity to seven.



## 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 2025**

There are no new public housing units planned for FY 2025.

AMP Name and Number	Bedroom Size						Total Units	Population Type**	# of UFAS Units	
	0/1	2	3	4	5	6+			Section 504 Accessible Units* (Mobility)	Section 504 Units* (Hearing/Vision)
							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 777 units/vacant lots in FY 2025. This count includes 762 housing units and 15 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 2025**

PIC Dev.#/AMP & PIC Dev. Name	Number of Units to be Removed	Explanation for Removal
O'Donnell Heights MD002/0000009 6301 O'Donnell St.	1 Vacant Lot	This parcel represents the 2 <sup>nd</sup> phase of the redevelopment of the O'Donnell Heights public housing site. The Phase 2 parcel consists of 27 cleared acres and is expected to be developed in 4 residential sub-phases and include a new central park. The first subphase is identified as Phase 2A, totaling 4.5 acres will include 60 affordable rental units. A disposition application for Phase 2A was submitted in July 2024. HABC is working with the developer to submit disposition applications for the remaining 2 sub-phases and the new central park in 2025.
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. If approved, tenant relocation may start in 2024.
Poe Homes MD002/0000004	288	HABC received HUD approval to demolish Poe Homes pursuant to the Transform Poe redevelopment plan. All 288 units at Poe will be demolished in 2025.
Reservoir Hill 2 MD002/000118	40	Planned RAD conversion.
Sharp Leadenhall MD002/000119	23	Planned RAD conversion.

PIC Dev.#/AMP & PIC Dev. Name	Number of Units to be Removed	Explanation for Removal
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 1319 Mosher St.	1	This unit has been deemed not viable due to an abundance of vacant properties on this block.
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.

PIC Dev.#/AMP & PIC Dev. Name	Number of Units to be Removed	Explanation for Removal
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 201 MD002/000201 510 E. 26 <sup>th</sup> 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 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 202 MD002/000202 1702 McKean 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 2428 W. Franklin St.	1	This unit has been deemed not viable due to an abundance of vacant properties on this block.
Scattered Sites 203 MD002/000203 3012 Oakley 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 4108 Park Heights Ave.	1	The condition of the adjacent property poses a risk to the structural integrity of this unit.
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.
Scattered Sites 203 MD002/000203 4918 Palmer Ave.	1	HABC has determined property is non-viable and will dispose of it in accordance with scattered site strategy.
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

PIC Dev.#/AMP & PIC Dev. Name	Number of Units to be Removed	Explanation for Removal
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.
Uptown Apartments MD002/000108 917 N. Calhoun St. A	1	HABC has determine 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. Gilmor 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. Gilmor 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.

PIC Dev.#/AMP & PIC Dev. Name	Number of Units to be Removed	Explanation for Removal
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.
Scattered Sites 201 MD002/000201 1841 N. Montford Ave.	1	Unit is not viable due to neighborhood conditions and would not provide safe housing for an HABC tenant
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.

PIC Dev.#/AMP & PIC Dev. Name	Number of Units to be Removed	Explanation for Removal
Scattered Sites 201 MD002/000201 509 E. 22 <sup>nd</sup> 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 <sup>th</sup> 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 <sup>th</sup> 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 <sup>th</sup> 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 <sup>th</sup> 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 <sup>th</sup> 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 <sup>th</sup> 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



PIC Dev.#/AMP & PIC Dev. Name	Number of Units to be Removed	Explanation for Removal
		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 <sup>th</sup> St.	1	This unit has been deemed not viable due to an abundance of vacant properties on this block.
Scattered Sites 201 MD002/000201 2112 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 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.

PIC Dev.#/AMP & PIC Dev. Name	Number of Units to be Removed	Explanation for Removal
Scattered Sites 202 MD002/000202 1113 N. Gilmor 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 Laurretta 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 200 MD002/000200 1006 E. Preston St.	1	This unit has been deemed not viable due to an abundance of vacant properties on this block.
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 an extensive rehabilitation in excess of 57.4% of TDC.
Scattered Sites 201 MD002/000201 320 E. 20 <sup>th</sup> 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.

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

PIC Dev.#/AMP & PIC Dev. Name	Number of Units to be Removed	Explanation for Removal
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 MD002/000203 2109 Chelsea Terr B.	1	Unit is not viable due to neighborhood conditions and

PIC Dev.#/AMP & PIC Dev. Name	Number of Units to be Removed	Explanation for Removal
		would not provide safe housing for an HABC tenant.
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	Shipley Hill - Unit is not viable due to neighborhood conditions and would not provide safe housing for an HABC tenant.
Scattered Sites 203 MD002/000203 205 S. Franklinton Ct.	1	Shipley Hill - Unit is not viable due to neighborhood conditions and would not provide safe housing for an HABC tenant.
Scattered Sites 203 MD002/000203 207 S. Franklinton Ct.	1	Shipley Hill - Unit is not viable due to neighborhood conditions and would not provide safe housing for an HABC tenant.
Scattered Sites 203 MD002/000203 209 S. Franklinton Ct.	1	Shipley Hill - 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 211 S. Franklinton Ct.	1	Shipley Hill - Unit is not viable due to neighborhood conditions and would not provide safe housing for an HABC tenant.
Scattered Sites 203 MD002/000203 215 S. Franklinton Ct.	1	Shipley Hill - Unit is not viable due to neighborhood conditions and would not provide safe housing for an HABC tenant.
Scattered Sites 203 MD002/000203 217 S. Franklinton Ct.	1	Shipley Hill - Unit is not viable due to neighborhood conditions and would not provide safe housing for an HABC tenant.
Scattered Sites 203 MD002/000203 219 S. Franklinton Ct.	1	Shipley Hill - Unit is not viable due to neighborhood conditions and would not provide safe housing for an HABC tenant.
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.
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 1388 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.



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

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

PIC Dev.#/AMP & PIC Dev. Name	Number of Units to be Removed	Explanation for Removal
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.
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 2100 E. Hoffman St.	1	This unit has been deemed not viable due to an abundance of vacant properties on this block.
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.
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.
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.

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

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

PIC Dev.#/AMP & PIC Dev. Name	Number of Units to be Removed	Explanation for Removal
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.
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.
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 <sup>th</sup> 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.

PIC Dev.#/AMP & PIC Dev. Name	Number of Units to be Removed	Explanation for Removal
Scattered Sites 201 MD002/000201 338 E. 26 <sup>th</sup> 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.
Scattered Sites 201 MD002/000201 2013 E. 32 <sup>nd</sup> 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 512 N. Fulton St.	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 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 <sup>th</sup> 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.
<b>TOTAL</b>	<b>777</b>	

### 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 251 new project-based units in FY 2025, 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
Carey House	23	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.
Laurens House	36	Yes	RAD PBV. Renovation of all dwelling units for elderly persons over 62 years old and non-elderly persons with disabilities. Located in West Baltimore
Perkins 4	39	No	Part of PSO Transformation
Perkins 5	80	No	Part of PSO Transformation
Sharp Leadenhall	23	Yes	RAD PBV or RAD/Section 18 Blend. Family development. 1 to 5 bedroom units
Renaissance at Reservoir Hill	40	Yes	RAD PBV or RAD/Section 18 Blend. Family development. 1 to 5 bedroom units
Red Maple Place (Thompson)	10	No	48-unit project in Towson in Baltimore County.
<b>Total Planned New Project-Based Vouchers</b>	<b>251</b>		

#### 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 12/31/2024. As noted, there are 3,398 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 Vouchers to be Project Based	Status at the End of 2024	RAD?	Description of Project
18 W. Read St., Inc.	10	Leased	No	10 1bd NED units at 18 W. Read St.
1234 McElderry St	50	Leased	No	13 1bd, 24 2bd and 13 3bd units for PH replacement at 1234 McElderry St.
214 E. Biddle St.	5	Leased	No	5 1bd NED units at 214 E. Biddle St.
22 Light Street Apts	2	Leased	No	2 LTA UFAS units located at 22 Light Street.
2301 N. Charles St., Inc.	7	Leased	No	2 efficiencies and 5 1bd NED/UFAS units at 2301 N. Charles St.
Alcott Place	28	Leased	No	28 1bd units at 2702 Keyworth Ave.
Artaban Ashburton Apartments	14	Leased	No	14 1bd NED units at 5906 Park Heights Ave.
Arbor Oaks	62	Committed	Yes	Conversion of 62 public housing units to a RAD/Section 18 Blend; 25 RAD PBV and 37 regular PBV. Renovation of all walk-up units in 3 garden apt. communities
Ashland Commons	12	Leased	No	12 1bd (8-NED) units at 1715 E Eager St.
Barclay	19	Leased	No	1 1bd, 1 2bd, and 17 3bd (1-NED, 4-UFAS) units at 2106-2234 Barclay St.
Barclay II (North Barclay Green)	15	Leased	No	11 1bd NED and 4 2bd UFAS units at 341 E. 20 <sup>th</sup> St.
Barrister Court	8	Leased	No	2 efficiencies, 5 1bd, and 1 2bd UFAS unit at 1300 Washington Blvd.
Beacon Communities*	38	Committed	No	One 12-unit project, and one 26-unit project at 1101 N Wolfe St awarded through RFP B-1922-20.
Beacon House Square	56	Committed	No	56 units located at 3549-3601 Old Frederick Road with a designation for PB for Veterans
Belvedere Place	11	Committed	No	11 units thru competitive process at 3101 W

Property Name	Number of Vouchers to be Project Based	Status at the End of 2024	RAD?	Description of Project
				Belvedere Ave applied to RFP B-1922-20.
Belvieu Gardens	10	Leased	No	10 1bd NED units at 3915-3921 Belvieu Ave.
Bellevue Manchester	8	Leased	No	8 1bd units at 342 Bloom St.
Bennett House	25	Leased	No	24 SROs and 1 1bd unit at 14 E Franklin St. designated to provide supportive services to low-income residents
Bon Secours – Gibbons	20	Leased	No	12 1bd NEDs, 4 2bd and 4 3bd UFAS units at 900 Desoto Rd.
Bon Secours – New Shiloh	19	Leased	No	16 1bd (11-NED), 2 2bd and 1 3bd units at 1930 Windsor Ave. (8-PB Homeless)
Brexton Chase	7	Leased	No	7 1bd NED units at 241 W. Chase St.
Brick by Brick	2	Leased	No	2 1bd NED units at 903 Gorsuch Ave.
Butchers Row	9	Leased	No	3 1bd, 2 2bd, and 4 3bd units at E. Baltimore St.
Calvert Street Properties	18	Leased	No	18 1bd NED units at 1625 N. Calvert St.
Calverton House	14	Leased	No	13 SROs and 1 efficiency at 119 E. 25 <sup>th</sup> St.
Chapel Green	20	Leased	No	8 1bd NED units and 12 3bd (4-UFAS) units at Chase, Wolfe, and Washington Streets
Cherry Hill Senior Housing	50	Leased	No	48 1bd NED units and 2 2bd UFAS units at 901 Cherry Hill Rd.
Cherrydale	32	Leased	No	32 1bd NED units at 1118 Cherry Hill Rd.
City Arts	11	Leased	No	11 1bd NED units at 440 E. Oliver St.
City Arts II	15	Leased	No	12 1bd NED and 3 2bd UFAS units at 1700 Greenmount Ave.
Clare Court Apartments	15	Leased	No	5 1bd, 7 2bd and 3 4bd (7-

Property Name	Number of Vouchers to be Project Based	Status at the End of 2024	RAD?	Description of Project
				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 1125 Patterson Park
DiMaggio Scattered Sites	23	Leased	No	8 2bd, 10 3bd, 4 4bd, and 1 5bd units designated for chronically homeless households at scattered sites
Dominion Properties	7	Leased	No	3 1bd NED units and 4 3bd units at 1617 Dukeland Ave., 6 <sup>th</sup> St., Hilton, and Monument Streets
Dorchester Apts.	10	Leased	No	10 1bd NED units at 4300 Liberty Heights Ave.
Druid Hill LTD	12	Leased	No	10 2 bd and 2 3bd units at 1621 Druid Hill Ave.
Druid House	19	Leased	No	8 2bd and 11 3bd units at McCulloh St.
Epiphany House	33	Leased	No	33 efficiencies at 5610 York Rd.
Fallstaff Apts.	4	Leased	No	2 1bd NED units, 1 2bd and 1 3bd (1-UFAS) units at 3800-3810 Fallstaff Rd.
Fells Point Station	14	Leased	No	11 1bd and 3 2bd (6-NED, 8-UFAS) units at 1621 Bank St.

Property Name	Number of Vouchers to be Project Based	Status at the End of 2024	RAD?	Description of Project
Flamingo Place	1	Leased	No	1 3bd LTA UFAS unit at 3930 Conduit Avenue
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*	40	Committed	No	40 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.
Hollander Ridge	94	Leased	Yes	19 – 1bd, 32-2bd, 35-3bd, and 8-4bd units converted from LIPH to PBV located at scattered units through Baltimore City.
Indecco	9	Leased	No	2 efficiencies and 7 1bd units at 940 S. Lakewood Ave.
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	12 1bd NED and 59 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.

Property Name	Number of Vouchers to be Project Based	Status at the End of 2024	RAD?	Description of Project
Keys Pointe – Phase 1B	34	Leased	No	19 1bd, 8 2bd, 4 3bd and 3 4bd (11-NED, 4-UFAS) units at Cardiff, Jarmon, Hornell, Boston, and Gallop Streets
L on Liberty	14	Leased	No	14 1bd (all NED) units at 216 N Liberty St.
Lillian Jones Apts.	22	Leased	No	14 1bd NED, 2-2bd and 6-3bd UFAS units at 1303 Greenmount Ave.
M on Madison	23	Leased	No	23 1bd NED units at 301 W. Madison St.
Marian House	8	Leased	No	4 SRO and 4 3bd units at 949 Gorsuch Ave.
Marian House II	5	Leased	No	5 1bd (3-NED, 2-UFAS) units at 932 Gorsuch Ave.
Mary Harvin Center	8	Leased	No	8 1bd units at 1600 N. Chester St.
Metro Heights at Mondawmin	18	Leased	No	13 1 bd, 2 2bd and 3 3 bd (10-NED, 1-UFAS) units, some designated for chronically homeless households at 2700 Reisterstown Rd.
Milford Station	6	Leased	No	6 1bd NED units at 3900 W. Northern Pkwy.
Moravia	60	Leased	No	57 1bd and 3 2bd units (9-NED, 6-UFAS) at 6050 Moravia Park Dr.
Mount Royal Apts.	5	Leased	No	5 1bd units at 1512 W. Mt. Royal Ave.
Mulberry at Park Apts.	19	Leased	No	11 1bd NED units, 2 2bd and 6 3bd UFAS units at 211 W. Mulberry St.
*New Shiloh 3	17	Committed	No.	17 units awarded under RFP B-1922-20 at 2300 N Monroe St.
North Barclay Green III	12	Leased	No	9 1bd units and 3 3bd UFAS units at E. 21 <sup>st</sup> St. and Greenmount Ave.
North Avenue Gateway	16	Leased	No	11 1bd NED units and 5 2bd units at 3001-3003 W. North Ave.

Property Name	Number of Vouchers to be Project Based	Status at the End of 2024	RAD?	Description of Project
North Avenue Gateway II	16	Leased	No	10 1 bd NED units and 6 1bd units at 3044 W. North Ave designated for chronically homeless.
Oaks at Liberty	45	Leased	No	45 1bd units at 3501 Howard Park Ave.
O'Donnell Heights	39	Leased	No	14 1bd (12-NED) units, 11 2bd units, 13 3bd units, and 1 4bd unit (4-UFAS)
Orchard Ridge I-V	197	Leased	No	119 1bd units 42 2bd units, 32 3bd units, 3 4bd units and 1 5bd unit (52-NED, 27-UFAS) at Orchard Ridge Blvd., Green Rose, and Maple Shade Dr.
Paca House	82	Leased	No	41 efficiencies and 41 1bd units at 116 N. Paca St. 63 units are designated for homeless and 19 units for veteran populations.
Parktown-Cason Arms	12	Leased	No	8 1bd NED units and 4 2bd UFAS units at 4637 Park Heights Ave.
Penn North	15	Leased	No	14 1bd NED units and 1 3bd UFAS unit at 2600 Pennsylvania Ave.
Penn Square II	15	Leased	No	12 1bd NED and 3 3bd UFAS units at 2600 Pennsylvania Ave.
Parkwood	3	Leased	No	3 1bd NED units at scattered sites
Perkins 1	48	Committed	Yes	Blend of 20 RAD PBV and 28 PBV units. All LTA at 1401 E. Pratt Street
Perkins 2A	50	Committed	No	LTA PBV units at 226 Caroline Street
Perkins 2B	26	Committed	No	26 LTA PBV units at 1500 Claremont St
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



Property Name	Number of Vouchers to be Project Based	Status at the End of 2024	RAD?	Description of Project
				UFAS and 2 3bd UFAS units at 866 W. Fayette St.
Pratt Street	35	Leased	No	27 2bd and 8 3bd units at 1700 W Pratt St. – transitional housing
Restoration Gardens	43	Leased	No	40 efficiencies and 3 1bd units designated for homeless youth at 3701 Cottage Ave.
Restoration Gardens II	42	Leased	No	42 efficiencies (3-UFAS units) designated for homeless youth at 4201 York Rd.
Rye House*	9	Committed	No	9 units awarded under RFP B-1922-20 at 255 Atlas St, Baltimore, MD 21230
Seminole Apartments	6	Leased	No	6 1bd NED units at 4300 Seminole Ct.
Sharon Towers	10	Leased	No	10 2bd units at 4-6 N. Carey St.
Sharp Leadenhall	4	Leased	No	4 1bd units (3-UFAS) at Race and West Streets
Sojourner at Argyle Apartments	12	Leased	No	12 1bd (2-UFAS) units designated for chronically homeless households at 1411 Argyle St.
Sojourner Place at Preston	35	Leased	No	25-1bd, 5-2b, and 5-3bd units located at 1201 E Preston St.
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	15	Leased	Yes	15 RAD PBV units at PSO
Somerset 3	21	Leased	No	21 LTA PBV units at 420 N Aisquith St.
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

Property Name	Number of Vouchers to be Project Based	Status at the End of 2024	RAD?	Description of Project
				1,345 units of mixed income housing.
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	202	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.
Union Ave. – Buena Vista Apartments	48	Leased	Yes	15 1 bd and 33 2 bd units converted through Rental Assistance Demonstration (RAD-2) at 1420-1436 Union Ave
Uplands	62	Leased	No	24 1bd, 31 2bd, and 7 3bd units (16-NED, 6-UFAS) at 4520 Scarlet Oak Ln.
Walbrook Mills Apts	1	Leased	No	1 3bd (UFAS) unit at 2636 W North Ave.
Walbrook Mills*	4	Committed	No	4 units awarded under RFP B-1922-20 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	18	Leased	No	14 2bd and 4 3bd units

Property Name	Number of Vouchers to be Project Based	Status at the End of 2024	RAD?	Description of Project
– Guadenzia at Park Heights				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 1bd and 5 2bd units at 4755 Park Heights Ave (7 UFAS).
Berger Square (Thompson)	10	Leased	No	A project located in Odenton in Anne Arundel County, near transit, employment centers near Fort Meade and Arundel Mills, and close to the MARC station.
Burgess Mills (Thompson)	20	Leased	No	A 198 unit mixed-income project located in Ellicott City in Howard County.
Eagle Park (Thompson)	12	Issued	No	New construction in Hanover in Anne Arundel County, with 12 project-based units
Ellicott Gardens (Thompson)	14	Leased	No	A 70-unit project located in Ellicott City in Howard County, a second phase of an existing project. Ellicott Gardens will provide much needed affordable housing for families in this opportunity area.
Scattered Sites -Pilatus Opportunity Fund (Thompson)	36	Leased	No	Scattered site units in high-opportunity areas throughout the region.
Scattered Sites -Harford Home Rentals (Thompson)	10	Leased	No	Scattered site units in high-opportunity areas throughout the region.
Scattered Sites – Fort	5	Leased	No	Scattered site units in high-

Property Name	Number of Vouchers to be Project Based	Status at the End of 2024	RAD?	Description of Project
700 (Thompson)				opportunity areas throughout the region.
Homes at Fountain Green (Thompson)	10	Leased	No	New construction in Harford County, of which 10 units will be BRHP project-based units. Project is currently at 97% construction completion and leasing will begin in coming month
<b>Total Planned Existing PBVs</b>	<b>3,398</b>			

\*Incorrectly excluded from prior plans and reports.

**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 will implement a wide range of capital investments at existing public housing sites and continue its program of citywide housing development activities as summarized on Table 5. Additional discussion of capital plans, infrastructure and extraordinary maintenance issues and initiatives is included below. As summarized in Table 5, in FY 2025 HABC projects it will expend a total of approximately \$20 million on capital expenditures which includes \$16.1 million of capital-related activities. Actual projects, timetables and expenditures may vary. HABC may modify its planned capital expenditures during the Plan year based on changing priorities, emergency

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

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

No.	Development Name	Description of Work	FY 2025 Planned Expenditures
1.	Latrobe Homes	Brink Work and Tuckpointing, Electrical Switchgear Replacement/Upgrade, Storage Tank Replacement for individual DHW Loop, Electric Submeter Replacement and Upgrade for Excessive Consumption Charges	\$2,800,000
2.	Poe Homes	Demolition	\$ 800,000
3.	Gilmor Homes	Install Metal Doors, Repair all Exterior Concrete Work, Repair Electrical and Insulate Crawl Spaces	\$3,800,000
4.	O'Donnell Heights	Emergency Repairs	\$ 100,000
5.	Cherry Hill Homes	Waterproofing and Tuckpointing, Electric Submeter Replacement and Upgrade for Excessive Consumption Charges	\$1,670,000
6.	Brooklyn Homes	Electric Submeter Replacement and Upgrade for Excessive Consumption Charges	\$ 400,000
7.	Westport Homes	Replace Hot Water Tanks	\$ 400,000
8.	Scattered Sites	Roofing Replacement, Window Replacement, Vacancy Renovations	\$1,900,000
9.	Authority-Wide	Kitchen Cabinets and Countertops, Bathrooms Cabinets and Sinks, Windows, Electrical Distribution Upgrade, Electrical Work, Mechanical Work, Vacancy Renovation, Site Improvements, Install Safety and Security Measures	\$4,200,000
10.	Central Office	Non-Technical Salaries and Benefits	\$ 927,012
11.	Central Office	Technical Salaries	\$1,611,965
12.	Central Office	Admin and Operating Cost, Audit and Overhead Fees	\$824,160
13.	Central Office	A & E and Environmental Consulting Fees	\$ 255,000
14.	Central Office	Legal, Planning and Utility Consulting Fees	\$ 125,000
<b>TOTAL</b>			<b>\$19,813,137</b>

#### Planned Capital Expenditures During the Plan Year

### Infrastructure and Extraordinary Maintenance

The Capital expenditures are typical “systemic” replacements and repairs i.e.: exterior entrance doors, roofs, windows, tuckpointing, paving, etc.

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

Capital expenditures related to the demolition of Poe Homes are anticipated to begin in 2025. There is \$ 800,000 in the Capital Plan for preparation of plans and permits for demolition and the start of the actual demolition.

### 504 Accessibility Improvements

HABC has over 300 units compliant with Uniform Federal Accessibility Standards (UFAS) in its public housing inventory. To the extent that they remain viable, HABC will continue to maintain those UFAS units, common areas and accessible routes and/or modify units to meet reasonable accommodation and immediate need requests.

HABC is creating additional UFAS units through the Perkins Somerset Old Town (PSO) redevelopment project. In addition to replacing the 67 UFAS units that were in Perkins Homes, an additional 102 UFAS units are being created throughout the redevelopment phases for a total of 169 UFAS units.

### Safety & Security Initiatives

HABC will continue to maintain and expand its security camera system throughout the housing developments. This expansion will include the leasing and maintenance offices. Additionally, the system will be monitored for the end of useful life of the cameras and operating systems with the goal of enhancing the functionality of the NVR/cloud storage relationship.

The bollard traffic control system will be expanded to control ingress and egress on our properties. Buildings and areas storing sensitive items will have a systems upgrade including installation of card reader access.

### Facilities & Real Estate

HABC continuously assesses and, as needed, renovates HABC facilities across the various developments and its Duncanwood Maintenance and Storage Facility. There is ongoing management of leased space at the Benton Building and the West Pratt Street or Mount Clare Junction facilities. HABC leases the space at Duncanwood and will oversee any major changes in the future. Completion of the disaster recovery/emergency response system at this location and other renovations at Duncanwood are currently under construction after extensive delays in planning, permitting, and other logistical issues and will be completed by the end of 2024.

HABC completed the conversion of the day care center at Heritage Crossing into its Application and Leasing Center and will manage and maintain the facility at this location.

Management and maintenance of these facilities is ongoing.

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

HABC continues to monitor, measure and verify savings for the Phase I Energy Performance Contracting (EPC) properties; Latrobe Homes, Cherry Hill Homes, Gilmor Homes, Westport Homes and Brooklyn Homes and the second EPC Program for the properties; Douglass Homes, McCulloh Homes Low Rise, McCulloh Homes Townhomes, Mt Winans, and Scattered Sites.

The Energy Department 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 company has increased efforts to support billing and reporting efforts for the first EPC sites. They are in the process of instituting the same process for the EPC 2 properties once the sub-metering infrastructure is installed and/or upgraded. HABC's Energy Department oversees this company in close collaboration with other agency departments. Additionally, the Energy Department ensures all Utility Allowances & Excessive Consumption Charges (ECC) updates are performed for the developments under the EPC program.

## **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 2025.

**Table 6: Planned Number of Households Served at the End of FY 2025**

<b>Planned Number of Households Served Through:</b>	<b>Planned Number of Units Months Occupied/Leased</b>	<b>Planned Number of Households to be Served</b>
MTW Public Housing Units Leased	67,860	5,655
MTW Housing Choice Vouchers (HCV) Utilized*	172,806	14,401
MTW Thompson Housing Choice Vouchers**	51,900	4,325
Local, Non-Traditional: Tenant-Based	0	0

Planned Number of Households Served Through:	Planned Number of Units Months Occupied/Leased	Planned Number of Households to be Served
Local, Non-Traditional: Property-Based	2,249	187
Local, Non-Traditional: Homeownership	0	0
<b>Planned Total Households Served</b>	<b>294,815</b>	<b>24,568</b>

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

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

**Table 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	2,249	187
Homeownership	N/A	0	0
<b>Planned Households Served – Local, Non-Traditional Programs</b>		<b>2,249</b>	<b>187</b>

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

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

**Table 8: Anticipated Issues and Possible Solutions Related to Leasing**

Housing Program	Description of Anticipated Leasing Issues and Possible Solutions
MTW Public Housing	There are no anticipated issues with leasing in 2025.
MTW Housing Choice Voucher	With the introduction of the new Owner Portal, HABC hopes to streamline owner processes to increase productivity and processing timeframes for lease up.
BRHP	No leasing issues are anticipated

**C. Waiting List Information**

**i. Waiting List Information Anticipated**



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

**Table 9: Waiting List Information Anticipated**

Waiting List Name	Description	Number of Households on Waiting List	Waiting List Open, Partially Open or Closed	Plans to Open the Waiting List During the Plan Year
Federal MTW Public Housing	Community Wide	38,041	Closed	No
Federal Public Housing-Mixed Population	RAD Waiting List	4,102	Closed	No
Federal MTW Housing Choice Voucher Units: Tenant-Based	Community Wide	27,790	Closed	No
Federal MTW Housing Choice Voucher Units: Project-Based	Site-Based	9,356	Closed	No
RAD Choice Mobility	Program Specific	122	Open	Remains open
Thompson Vouchers *	Program Specific	11,000	Closed	Yes

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

**Describe any duplication of applicants across waiting lists:**

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

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

Waiting List Name	Description of Planned Changes to the Waiting List
MTW Housing Choice Voucher Waiting List	No changes are anticipated in FY 2025 for the HCV program waiting list
MTW Public Housing Waiting List	No changes are anticipated in FY 2025.
RAD Choice Mobility Waiting List	No changes are anticipated in FY 2025 for the RAD Choice Mobility Waiting List
Thompson Vouchers	BRHP will introduce an online applicant portal in late 2024 that will allow applicants to update their information with the program electronically. As part of the outreach and process needed to get all applicant households registered on the portal, we anticipate that a portion of households will be unresponsive to mail, phone and electronic outreach, and therefore removed from the waitlist. Depending on the number of

Waiting List Name	Description of Planned Changes to the Waiting List
	household who are removed, we may need to re-open the waitlist in 2025.

### III. Proposed MTW Activities

This section of the MTW Annual Plan provides information on new MTW activities proposed for FY 2025.

#### Activity #2025-01: Affordable Housing Preservation Fund

##### Description/Update of MTW Activity

HABC will utilize MTW funding to support the preservation of affordable rental housing units through implementation of a new Affordable Housing Preservation Fund (AHP). Proposed revitalization efforts in FY 2025 will focus on seven non-federal affordable housing developments which were originally funded with state provided capital funds under the Partnership Rental Housing Program. Legal title to each of the projects is held by HABC or an instrumentality of HABC. The projects operate under regulatory agreements with the Maryland Department of Housing and Community Development (DHCD), which requires that the units are rented to low-income households only.

This local non-traditional activity falls under the category of Housing Development Programs as defined in HUD PIH Notice 2011-45 (Notice). The activity will conform 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 will support revitalization of state-assisted rental units targeted for households earning less than 80% of Area Median Income. Where regulatory and operating agreements specify lower income thresholds, HABC will follow the R&O agreement. Repairs and improvements will be made to ensure that all units meet HQS or successor standards. 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
- Newly proposed affordable developments involving LIHTC
- At-risk affordable developments nearing the end of their compliance period

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

Only projects that demonstrate readiness to proceed will be eligible for funding. HABC will evaluate the status of necessary zoning and permitting approvals, the status of architectural documents, and the status of other funding commitments as a way to determine project readiness. HABC may also prioritize projects that produce or preserve a set number of total units for homeless families or individuals, and that incorporate mixed-uses.

Two hundred thirty-five units of affordable housing are projected to be preserved; however, funding under this local, non-traditional initiative will support only the 205 state funded units. As noted in the chart below, two of the proposed projects (Barrister Court & Indecco) include a subset of 17 units under existing PBV contracts, while another project (Montpelier's Choice) includes a subset of 13 Public Housing ACC units. For these 30 PBV and ACC units, HABC plans to utilize capital funds and single fund flexibility to fund preservation, which does not require a local, non-traditional activity waiver. While no specific per unit funding cap has been established, HABC anticipates that the average AHP preservation related costs per unit will not exceed \$26,000 in FY 2025. HABC will request HUD approval in the event that the TDCs exceed HUD's limit. The following projects are slated for preservation funding under this activity in FY 2025. Please note, HABC has included in the table below the PBV and ACC units which will not receive funds under this activity; but will receive funding under HABC's capital program or through the use of single fund flexibility.

Development Name	No. of State Assisted Units Preserved	Estimated AHP Funding	Number of PBV Units under a HAP Contract	Number of Public Housing ACC Units	Total Units Preserved
Barrister Court	24	\$ 630,000	8		32
Indecco	36	\$ 919,149	9		45
Irvington Place	41	\$ 1,046,809			41
Montpelier's Choice	26	\$ 657,191		13	39
Norman Lohn	12	\$ 306,383			12
Somerset Chase	22	\$ 561,702			22
West Lexington	44	\$ 1,123,404			44
<b>TOTAL</b>	<b>205</b>	<b>\$5,244,638.00</b>	<b>17</b>	<b>13</b>	<b>235</b>

### Statutory Objective

This initiative will support the MTW Statutory Objective of increasing housing choice for low-income families.

### Anticipated Timeline

HABC is prepared to implement this activity upon HUD Approval.

### Anticipated Impact

The anticipated impact of this initiative is the preservation of affordable housing units for low-income households.

### Metrics

Outcomes will be reported in the MTW Annual Report.

CE #4: Increase in Resources Leveraged*				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Amount of funds leveraged in dollars (increase)	\$0	\$15,274,101		
*Leveraged resources shown are the estimated values of the land and buildings for each project.				
HC #2: Units of Housing Preserved*				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of housing units preserved for households at or below 80% AMI that would otherwise not be available (increase)	0	205		
*Total number of units to be preserved under this activity only. Does not include ACC or PBV units				

### Data Source

HABC will use data collected from its partner agencies to track leveraged resources and number of participants assisted as a result of this activity.

#### **Authorization Standard**

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 Streamlined Recertification Process)

##### 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.

##### 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 Recertification

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.

### Limit on Interim Recertifications

In FY 2020, HABC limited the number of voluntary interim recertifications between regular recertifications as outlined below for the HCV program only. In 2024, the limit on interim recertifications was applied to the Public Housing Program. HABC's MTW interim recertification policy supersedes the HOTMA interim recertification provision. Additionally, HABC will process interim rent adjustments unless HABC confirms that the decrease in income will last less than 30 calendar days and/or if the family has exceeded the MTW limit on voluntary interim rent reductions.

Required interim recertifications will not count against the limit on voluntary interim recertifications, i.e., interim recertifications required for changes in family composition. Elderly/disabled families and families in the FSS program are exempt from the limit on interim recertifications.

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

HABC's MTW interim recertification policy supersedes the HOTMA provision whereby HABC may decline to conduct an interim recertification if the family's adjusted income is less than an HABC established percentage. Additionally, HABC will not process interim rent adjustments if the family



has exceeded the MTW limit on voluntary interim rent reductions, except for approved hardships.

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 HOMTA 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.

Rent Increase Effective Dates: As an alternative to the HOMTA 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)

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

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.

Hardship Policy: HABC's hardship policy allows for an additional interim rent reduction, beyond the limit, where the loss of income or increase in applicable unreimbursed expenses represents at least a 20% reduction in adjusted income and where the loss of income or increase in unreimbursed medical or childcare expenses are beyond the family's control. The rent for a family who was granted an additional rent reduction will be reduced. During periods of declared emergencies, HABC will waive the limit on interim recertifications.

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

HABC removed the policy whereby interim rent decreases are not processed if the decrease in income will last less than 30 calendar days.

Until HOMTA changes have been implemented, HABC will waive the requirement to run EIV at interim certifications.

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

### Planned Changes to Metrics/Data Collection

Existing metrics have been updated to reflect the anticipated outcomes in FY 2025. The metric regarding time savings for the Alternate Verification Hierarchy was mistakenly entered under the Rent Simplification activity and has been moved to this activity.

### Metrics

<i>CE #2: Staff Time Savings</i>				
Unit of Measurement	Baseline*	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease)	<b>Biennial and Triennial</b>			
	PH: 23,920 hours	PH: 5,108 hours		
	HCV: 27,715 hours	2,043 biennial and triennial recertifications completed X 2.5 hours/recert		
		HCV: 15,073 hours		
	<b>Limit on Interims</b>			
	PH time spent on interims: 744 hours	PH time spent on interims: 375 hours		
	PH Interims: 992	PH: interims: 500		
	Time per interim: 45 min.	Time per interim: 45 min.		

	HCV time spent on interims: 2,423 hours  HCV interims: 3,231 Time per interim: 45 min.	HCV time spent on interims: 2,250 hours  HCV: interims: 3,000 Time per interim: 45 min.		
<i>*Assumes 2/3 of the interims completed are for voluntary purposes, i.e., change in income and the remaining 1/3 are for required purposes.</i>				
Total amount of staff time dedicated to the task prior to implementation of the activity (in hours)	Alternate Verification Hierarchy*			
	4,568  Number of regular and interim recertifications 9,135 PH & HCV  Time per recertification to verify family information .5 hours	2,893  Number of regular and interim recertifications 11,572 PH & HCV  Time per recertification to verify family information .25 hours		
<i>*Represents time savings for PH and HCV when using alternate verification hierarchy. 2024 represents first year.</i>				

## Planned Significant Changes

No significant changes are planned.

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

**Plan Year Approved, Implemented, Amended**

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

**Description/Update**

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

1. Subject to funding availability, owners may obtain applicants directly from the Mayor's Office of Homeless Services (MOHS) or other designated service providers for the chronically homeless and veterans or other such targeted population and refer such

applicants to HABC to determine eligibility for receiving a voucher subsidy. All referrals will be placed on a waiting list maintained by HABC. HABC has set aside 230 project-based vouchers for homeless individuals, 50 project based vouchers for homeless families with children and 620 tenant-based vouchers for homeless individuals and families. By the end of 2025, HABC anticipates full utilization of the 900 set aside vouchers. Additionally, by the end of FY 2025 HABC anticipates that there will be 56 units under contract for homeless veterans.

2. Owners are required to maintain the designated unit for the term of the PBV HAP contract. In the event the owner fails to lease a designated unit to an approved applicant, such failure will be considered a default under the PBV HAP Contract. If the default is not cured within 60 calendar days, HABC can remove the unit from the HAP contract, or recapture the amount of HAP paid for the period of time the tenant was occupying such unit in violation of the terms of the PBV HAP contract.

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

In FY 2025 HABC anticipates that 251 new PBV units will be placed under AHAP or HAP representing 7 PBV projects. In total, by the end of FY 2025, HABC anticipates that there will be a total of 3,649 PBV units under AHAP or HAP.

### Planned Non-Significant Changes

No non-significant changes are planned.

### Planned Changes to Metrics/Data Collection

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

### Metrics

<i>HC #1: Additional Units of Housing Made Available *</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of new housing units made available for households at or below 80% AMI as a result of this activity (increase)	Implemented in FY 2019	251		
<i>*Represents the number of new PBV planned in each fiscal year.</i>				

<i>HC #4: Displacement Prevention *</i>				
Unit of Measurement	Baseline **	Benchmark	Outcome	Benchmark Achieved?
Number of households at or below 80% AMI that would lose assistance or need to move	2,652 households	3,649		
<i>*Metric reflects the total number of HABC and BRHP existing and new PBV units.</i> <i>** Baseline reflects the existing number of HABC and BRHP managed PBV units as referenced in the FY 2022 Plan.</i>				
<i>HC #5: Increase in Resident Mobility*</i>				
Unit of Measurement	Baseline **	Benchmark	Outcome	Benchmark Achieved?
Number of households able to move to a better unit and/or neighborhood of opportunity as a result of the activity (increase).	2,652 households	3,649 households		
<i>*Metric reflects the total number of HABC and BRHP existing and new PBV units.</i> <i>**Baseline reflects the existing number of HABC and BRHP managed PBV units as referenced in the FY 2022 Plan.</i>				

### Planned Significant Changes

No significant changes are planned.



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

### Plan Year Approved, Implemented, Amended

Approved FY 2006 and implemented FY 2007.

### Description/Update

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

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.

### Planned Non-Significant Changes

No non-significant changes are planned.

### Planned Changes to Metrics/Data Collection

Metrics have been updated to reflect anticipated 2025 outcomes.

### Metrics

CE #2: Staff Time Savings				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?

Total time to complete the task in staff hours (decrease)	934 hours	3,225 hours 2,150 recerts 1.5 hrs./recert		
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### Planned Significant Changes

No significant changes are planned.

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

### Plan Year Approved, Implemented, Amended

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

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.

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
\$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 are planned for completion 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**

No non-significant changes are planned.

## Planned Changes to Metrics/Data Collection

Benchmarks have been updated to reflect anticipated outcomes for FY 2025.

### Metrics

<b>SS #1: Increase in Household Income*</b>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average earned income of households affected by this policy in dollars (increase)	\$13,908	\$24,500		
<i>*Baseline represents average earned income for households with earned income in FY 2019. Benchmark indicates an increase of 2.3% growth.</i>				
<b>SS #2: Increase in Household Savings*</b>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average amount of escrow of households affected by this policy in dollars (increase)	\$4,099	\$4,000		
<i>*Baseline reflects average escrow for households with escrow at the end of FY 2019.</i>				
<b>SS #3: Increase in Positive Outcomes in Employment Status*</b>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Unemployed	202	202 56%		
Employed PT or FT	164	158 44%		
Enrolled in Education	10	11 3%		
Enrolled in Job Training	30	8 2%		
<i>*Baseline reflects households enrolled in FSS during FY 2019.</i>				
<b>SS #4: Households Removed from Temporary Assistance for Needy Families (TANF)*</b>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households receiving TANF assistance (decrease)	34	40 11%		
<i>*Baseline represents FSS households receiving TANF benefits at the end of FY 2019.</i>				
<b>SS #5: Households Assisted by Services that Increase Self-Sufficiency</b>				

Unit of Measurement	Baseline*	Benchmark	Outcome	Benchmark Achieved?
Number of households receiving services aimed to increase self-sufficiency (increase)	0	360		
<i>*Baselines were established in FY 2020 report.</i>				
<b>SS #7: Increase in Agency Rental Revenue*</b>				
Unit of Measurement	Baseline **	Benchmark	Outcome	Benchmark Achieved?
Total Household contributions towards housing assistance (increase)	\$280	\$326		
<i>*Represents Tenant Rent to Owner.</i>				
<i>**Baselines were established in FY 2020 report.</i>				
<b>SS #8: Households Transitioned to Self Sufficiency*</b>				
Unit of Measurement	Baseline**	Benchmark	Outcome	Benchmark Achieved?
Number of households transitioned to self-sufficiency (increase)	0	7		
<i>*Self-sufficiency is defined as graduation from the FSS program.</i>				

### Planned Significant Changes

No significant changes are planned.

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

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

- Exception Payment Standards: Approved and implemented FY 2007.
- Security Deposit Assistance: Approved and implemented FY 2022.
- Incentive Payments to Landlords: Approved FY 2019 and implemented FY 2022.
- 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 \$200 and \$500 dollars, which will be adjusted seasonally to encourage leasing in summer months.

BRHP also provides assistance to Mobility Program participants to include 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

No non-significant changes are planned.

### Planned Changes to Metrics/Data Collection

Metrics have been updated to reflect anticipated volumes in FY 2025.

### Metrics

<i>HC #5: Increase in Resident Mobility – Payment Standards &amp; Security Deposit*</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households able to move to a better unit and/or neighborhood of opportunity as a result of the activity (increase)	Payment Standards: 0  Security Deposit Assistance: 300	Payment Standards: 884 families who move to exception PS areas		
<i>*Metrics represent BRHP's mobility program only</i>				
<i>HC #7: Households Assisted by Services that Increase Housing Choice – Security Deposit</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households receiving services aimed to increase housing choice (increase)	300	425 Security Deposit Assistance		
<i>*Metrics represent BRHP's mobility program only</i>				

### Planned Significant Changes

No significant changes are planned.

## 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.

### 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 contribution for closing costs up to \$5,000 to be applied at closing. All closing costs will be based on need and only apply after required personal contribution, government and/or lender assistance have been applied. 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 MTW Homeownership program. Families will be required to attend homeownership counseling and provide counseling certificates from one of the HABC approved HUD certified Housing Counseling Agencies. The property purchased must be in Baltimore City/County and the property must pass a lead test and Housing Quality Standard (HQS) inspection. HABC will establish criteria and guidelines to determine the amount awarded. HABC will not require the funds to be refunded unless the family is unable to obtain a mortgage to purchase a home in Baltimore City/County that meets the program eligibility requirements, or the family fails to submit required program documentation. The down payment/closing cost assistance will be granted at the time of settlement and paid directly to the title company. Funding is to be applied directly as down payment or applied to the closing cost. 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. 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 5<sup>th</sup> 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. 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 or Public Housing 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.

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

*Utility Allowances* – SHV participants are 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.

#### 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.

#### 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 July 2024, an additional eight of the 28 lots were sold to Habitat for Humanity of the Chesapeake. Construction for the first five units on the lots is projected to be completed in December 2024.
- 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. None of the affordable units will be completed in 2025.

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

HABC plans to make the following non-significant changes to the Housing Choice Voucher Homeownership program:

- **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.
- **Base Income Requirement:** HABC will require that families in the Homeownership program maintain, at a minimum, the greater of the gross wage income at the time of enrollment in the Homeownership program or the income used to obtain the mortgage financing. The amount will be referred to as the "base income". Where elderly and disabled families are concerned, the base income is equal to the amount authorized by the Social Security Administration. Where base income requirements are not met, HABC will calculate the subsidy based on the greater of the gross wages at the time of

enrollment in the Homeownership program or the income used to obtain the mortgage financing. Where an individual becomes disabled, the base income requirement will revert to the amount authorized by the Social Security Administration. The revised subsidy calculation will be effective after applicable hardships and any approved extensions have been exhausted. HABC is instituting this change to encourage a continued financial stream and to discourage voluntary employment gaps. Hardship policies are included in the Administrative Plan.

- **Income to Determine Family Payments:** Whereas the family uses Foster Care Payments and Adoption Assistance payments to qualify for a mortgage and/or increase mortgage affordability, HABC will use these sources as income to calculate the family's tenant portion.
- **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, withdrawn equity from the home 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.

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

Metrics have been updated to reflect the anticipated volume of homeownership transactions in FY 2025. Additionally, HABC is removing HC #5 as move to a better unit or an opportunity neighborhood are not applicable indicators of the success of this activity. Many homebuyers in scattered site units purchase the unit in which they currently reside. While HABC may encourage

HCV and SHV families to choose units opportunity neighborhoods, final purchase location is up to the family.

## Metrics

<i>HC #1: Additional Units of Housing Made Available</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of new housing units made available for households at or below 80% of AMI as a result of the activity (increase)	0	18		
<i>HC #6: Increase in Homeownership Opportunities</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households that purchased a home as a result of the activity (increase)	0	18		
<i>HC #7: Increase in Homeownership Opportunities*</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households receiving services aimed to increase housing choice.	0	35		
* Represents households who have applied for homeownership, receive mortgage approval, increased credit score and accumulate savings of at least \$2,000				

## Planned Significant Changes

No significant changes are planned.



## Activity #2010-01: Unit Sizes

### Plan Year Approved, Implemented, Amended

Approved and implemented FY 2010.

### Description/Update

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

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

### Planned Non-Significant Changes

No non-significant changes are planned.

### Planned Changes to Metrics/Data Collection

No changes are planned for metrics.

### Metrics

CE #1: Agency Cost Savings*				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease)	\$142,007,010	\$194,753,811		
<i>*Represents total HAP expenditures Metric does not accurately reflect savings since HAP increase is largely due to increased utilization and increases in rent.</i>				

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

### Plan Year Approved, Implemented, Amended

Approved and implemented FY 2010.

### Description/Update

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

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

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

HABC created an amendment to the HAP contract that sets forth requirements for the Bailey LTA PB units. The amendment increased the term of the contract to 40 years, consistent with the long-term affordability period and set forth what public housing rights, privileges and benefits must be afforded the residents in Bailey LTA PBV Program units.

By the end of FY 2025 there will be 281 LTA NED units. Each of these units provides much needed affordable units for persons with disabilities. HABC does not anticipate adding new units under this activity in FY 2025.

### Planned Non-Significant Changes

No non-significant changes are planned.

### Planned Changes to Metrics/Data Collection

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

### Metrics

<i>HC #5: Increase in Resident Mobility</i>				
Unit of Measurement	Baseline	Benchmark*	Outcome	Benchmark Achieved?
Number of households able to move to a better unit as a result of the activity (increase)	0 units	281		
*Based on the number of units under HAP contract				

### 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

No non-significant change are planned.

#### Planned Changes to Metrics/Data Collection

Metrics have been updated to reflect anticipated outcomes in FY 2025.

#### Metrics

<i>CE #2: Staff Time Savings</i>				
Unit of Measurement	Baseline *	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease)	Asset Income: 935 hours  Adjusted Income: 935 hours  FT Student and Adoption Assistance Exclusion: 21 hours	Asset Income: 0 hours  Adjusted Income: 1,125 hours  FT Student and Adoption Assistance Exclusion: 0 hours		

*\*Baseline represents lower number of assisted families as compared to currently assisted families. While benchmarks and outcomes are greater than the baseline, the time savings are still realized.*

**CE #5: Increase in Agency Rental Revenue\***

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total household contributions towards housing assistance (increase)	\$470	\$539		

*\* Baseline and Benchmark first established in FY 2019. HABC uses average TTP for this metric.*

### Planned Significant Changes

No significant changes are planned.

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

### Plan Year Approved, Implemented, Amended

Approved and implemented FY 2014.

### Description/Update

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

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

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

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

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

- O’Donnell Heights: 23 units;
- 1234 McElderry: 50 units; and
- Somerset 3 (The Ruby): 21 units.

In 2024, there were three additional contracts under AHAP which include LTA units, and it is anticipated that HAP contracts will be in place for the three projects by the end of 2024.

- Perkins 2A: 50 units
- Perkins 2B: 26 units
- Somerset 4: 19 units

By the end of FY 2025, 189 LTA units will be completed and leased.



### Planned Non-Significant Changes

There are no non-significant changes planned for FY 2025.

### Planned Changes to Metrics/Data Collection

Metrics were updated to reflect anticipated outcomes in 2025.

### Metrics

<i>HC #5: Increase in Resident Mobility</i>				
Unit of Measurement	Baseline	Benchmark*	Outcome	Benchmark Achieved?
Number of households able to move to a better unit and/or neighborhood of opportunity as a result of the activity (increase)	0 households	189		
<i>*Includes units ready for leasing.</i>				

### Planned Significant Changes

No significant changes are planned.

## 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.

- *Hardship*: Under the Rent Simplification activity, HABC has a hardship policy whereby, if a family has exceeded the limit on interim rent reductions, the family can request a hardship interim recertification where the loss of income or increase in applicable unreimbursed expenses represents a 20% reduction in adjusted income and where the loss of income or increase in unreimbursed medical or childcare expenses are beyond the family's control. Where a family member no longer attends school or a job training program, they are not required to report the change until the next regular recertification. As such, the family effectively retains the childcare expense deduction until the next regular recertification, which provides for time to find employment.

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.

### Planned Non-Significant Changes

The following non-significant changes are planned for 2025:

- 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 for new admissions and moves. Additionally, HABC 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, 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.

- 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.
- 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. At the family's next regular recertification, the family will be provided with a choice of income based or flat rent.

#### Planned Changes to Metrics/Data Collection

Metrics have been updated to reflect anticipated volume in FY 2025. Staff time savings for the Alternate Verification Hierarchy was mistakenly included in the Rent Simplification activity and has been moved to the Streamlined Admission & Recertification Process activity. Staff time savings was modified to reflect additional time savings for additional income exclusions and time savings for households with assets of \$50,000 or less.

#### Metrics

<i>CE #2: Staff Time Savings – Income Exclusions</i>				
Unit of Measurement	Baseline	Benchmark*	Outcome	Benchmark Achieved?
Total amount of staff time dedicated to the task prior to implementation of the activity (in hours)	Number of Adult FT Students with Earned Income & Households with Assets: 1,563 Time per FT Student and Household with Assets – Verification & Calculation: .5 hours	Total Time Spent on Activity after implementation 0 hours  Number of Adult FT Students with Earned Income, Households with Guaranteed Income and Households with Adoption Assistance		

	Total Time Spent on Activity Prior to Implementation 781.5 hours	Payments & Households with Assets \$50,000 or less: 600  Verification & Calculation: 0 hours per individual		
*Fully excluded income does not need to be verified. Accordingly, the verification of assets \$50,000 or less, guaranteed income, FT student earned income and adoption assistance payments is not required.				

### Planned Significant Changes

No significant changes are planned.

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

### Plan Year Approved, Implemented, Amended

Approved FY 2019; implemented FY 2020.

### Description/Update

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

HABC and BRHP establish payment standards based on the 50<sup>th</sup> 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 50<sup>th</sup> Percentile Rent Estimates.

HUD previously approved this activity as part of the FY 2009 MTW Annual Plan. Subsequently, HUD approved 50<sup>th</sup> percentile FMRs for the metropolitan Baltimore area at which time HABC removed this activity. With the advent of SAFMRs, the 50<sup>th</sup> 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 50<sup>th</sup> percentile FMRs to establish payment standards since FY 2009. Therefore, continuation of this policy will not change existing rent policies and will not result in hardships to voucher holders.

### Planned Non-Significant Changes

No non-significant changes are planned.

### Planned Changes to Metrics/Data Collection

Metrics have been updated to reflect FY 2025 anticipated outcomes.

## Metrics

<b>HC #7: Households Assisted by Services that Increase Housing Choice*</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of households receiving services aimed to increase housing choice (increase)	478	4,321		
<i>*Represents all BRHP assisted households only. Leased Housing families are not part of Mobility program services but are able to access the 50% percentile FMR.</i>				
<b>HC #5: Increase in Resident Mobility*</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of households able to move to a better unit and/or neighborhood of opportunity as a result of the activity (increase)	664	4,321		
<i>*Represents all BRHP assisted households only. Leased Housing families are not part of Mobility program services, but are able to access the 50% percentile FMR</i>				

## Planned Significant Changes

No significant changes are planned.



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

### Plan Year Approved, Implemented, Amended

Approved FY 2020 and implemented FY 2021.

### Description/Update

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

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

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

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

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

The reinspection fee will not apply to:

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

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

No non-significant changes are planned.

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

Metrics have been updated to reflect anticipated outcomes in FY 2025. As a result of software enhancements, inspection time is reduced to 45 minutes per inspection. The benchmark has been updated to reflect that change as well as a correction to the hourly rate. For accurate comparison of savings, the baseline hourly rate was also corrected.

### **Metrics**

<b>CE #1: Agency Cost Savings</b>				
<b>Unit of Measurement</b>	<b>Baseline*</b>	<b>Benchmark*</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Total cost of task in dollars (decrease)	<p>\$242,840</p> <p>Total cost first initial inspection fails and second regular reinspection fails:</p> <p>Number of first initial inspection fails + second regular reinspection fails: 6,069</p> <p>Time per inspection: 1.65 Hours</p> <p>6,069 x 1.65 10,014 hours</p> <p>10,014 hours x \$24.25 = \$242,840</p>	<p>Total inspection costs: 2,625 x \$24.25 \$63,656</p> <p>Number of first initial inspection and second annual fails: 3,500</p> <p>Total time: 3,500 x 45 minutes hours per inspection = 2,625 hours</p>		
*Hourly rate is a loaded rate and reflects current pay scales. Baseline was updated to reflect current loaded rate for accuracy of comparison.				
<b>CE #2: Staff Time Savings</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark*</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Total time to complete the task in staff hours (decrease)	<p>Number of first initial inspection fails + second regular reinspection fails: 6,069</p> <p>Total first inspection time: 6,069 x 1.65 hours per inspection= 10,014 hours</p>	<p>2,625 hours</p> <p>Total first initial + second annual fails inspection time: 3,500 x .75 hours</p>		
*HABC anticipates that implementation of a reinspection fee may result in a reduction in the number of re-inspections.				

## Planned Significant Changes

No significant changes are planned.

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

### Plan Year Approved, Implemented, Amended

Approved FY 2020; Implemented: FY 2022.

### Description/Update

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

Participating families are provided mobility counseling, which includes assistance in identifying a healthy environment based on participant needs. Participants may also be provided incentives to move within opportunity areas, such as higher payment standards and security deposit/first month's rent assistance. HOP will assist no more than 150 families at any given time. Support and counseling 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 Changes to Metrics/Data Collection

Benchmarks have been updated to reflect anticipated outcomes for FY 2025.

### Metrics

<i>HC #5: Increase in Resident Mobility</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households able to move to a better unit and/or neighborhood of opportunity as a result of the activity (increase)	0	40		
<i>HC #7: Households Assisted by Services that Increase Housing Choice</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households receiving services aimed to increase housing choice (increase)	0	40		

### Planned Significant Changes

No significant changes are planned.

## **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. In FY 2025, HABC will conduct an update to the existing market analysis and 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**

There are no non-significant changes planned.

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

#### **Metrics**

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



	new admissions and moves: 3,749*	new admissions and moves: 7,500		
<i>*FY 2018 data was used to establish the baseline</i>				

#### **Planned Significant Changes**

No significant changes are planned

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

### Plan Year Approved, Implemented, Amended

Approved FY 2020 and implemented FY 2020.

### Description/Update

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

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

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

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

Through 2024, HABC has acquired five of the ten Bailey units. Three of the acquired units are occupied and the fourth and fifth unit are completed and will be occupied on/before year-end 2024. In FY 2025, HABC will continue to vet listings and search for units that are within the established TDC thresholds. HABC is projecting acquiring two additional units in FY 2025 which will bring the total units purchased under this activity to seven.

### Planned Non-Significant Changes

There are no non-significant changes planned in FY 2025.

### Planned Changes to Metrics/Data Collection

HABC has updated the benchmarks to reflect the total units forecasted for lease through 2025.

### Metrics

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

### Planned Significant Changes

No significant changes are planned.

## Activity #2021-01: Emergency Waivers

### Plan Year Approved, Implemented, Amended

Approved FY 2021 and implemented FY 2021.

### Description/Update

The COVID-19 outbreak 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.

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

2. **Verification of Income:** During periods of declared emergencies, HABC will waive the requirements of the verification hierarchy, but continue to use EIV to confirm income at interim and regular recertification.
3. **Increase in Payment Standard:** HABC will waive the requirement to apply the increased payment standard back to the regular effective date for delayed regular reexaminations. Instead, during periods of declared emergencies, HABC will apply the increased payment standard at the next interim reexamination after the effective date of the increased payment standard. If HABC completes a reexam late, HABC will apply the payment standard in effect on the effective date of the delayed regular reexamination. This waiver applies to the HCV program.
4. **Delayed Regular HQS Inspections:** HABC will waive the requirement for completion of regular HQS inspections at least biennially. Where a regular HQS inspection has been delayed, HABC will complete the HQS inspection no later than the anniversary month of the following year. The next HQS inspection will be scheduled on the same anniversary month using the applicable inspection frequency for the unit. For example, if an HQS inspection was due on July 2025, HABC would complete the inspection by July 2026. The next scheduled annual HQS 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.
5. **Interim HQS Inspections:** HABC will waive the requirement to conduct re-inspections to confirm repair; however, HABC will require that the owner self-certify and provide documentation that a life-threatening deficiency has been corrected within 24 hours of notification or HABC will conduct a remote video conference within 24 hours to confirm repair. HABC will accept an owner self-certification that non-life-threatening deficiencies have been corrected within 30 days of HABC notification. This waiver applies to the HCV program.
6. **HQS QC Inspections:** HABC will waive the requirement to conduct HQS quality control inspections and instead will suspend HQS quality control inspections until the emergency waiver has been lifted. This waiver applies to the HCV program.

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

HABC does not anticipate utilization of the Emergency Waivers in FY 2025; 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.

#### Planned Changes to Metrics/Data Collection

The metric of this activity was updated to reflect the close of the current emergency waivers.

#### Metrics

<i>HC #4 Displacement Prevention</i>				
Unit of Measurement	Baseline*	Benchmark*	Outcome	Benchmark Achieved?
Number of households at or below 80% of AMI that would lose assistance or need to move (decrease)	0	0		
<i>*The benchmark represents the number of assisted households during the period of declared emergencies who are effectively protected from displacement</i>				

### **Planned Significant Changes**

No significant changes are planned.

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

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

Approved FY 2021 and implemented FY 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 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. As of June 2024, BRHP enrolled 224 households and executed 199 Contracts of Participation. Enrollment continues in 2024, and BRHP anticipates that it will



reach 250 households by the end of the FY 2024. Quarterly check-in meetings with households have resulted in completion of many individual goals, and in 2025 BRHP anticipate that over \$100,000 in goal completion escrow payments will be made.

The general parameters for incentive payments are as follows:

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

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

### Planned Non-Significant Changes

No non-significant changes are planned.

### Planned Changes to Metrics/Data Collection

Benchmarks have been updated to reflect anticipated program activity in FY 2025.

### Metrics

SS #1: Increase in Household Income				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average earned income of households affected by this policy in dollars (increase)	\$0	\$22,125		

<i>SS #2: Increase in Household Savings</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average amount of savings/escrow of households affected by this policy in dollars (increase)	\$0	\$800		
<i>SS #3: Increase in Positive Outcomes in Employment Status*</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Employed	0	150 60%		
Unemployed	0	100 40%		
Enrolled in Education or Job Training Program	0	75 30%		
<i>*As participants are still being enrolled, benchmarks are estimates based on enrollment of 75 participants</i>				
<i>SS #5: Households Assisted by Services that Increase Self Sufficiency</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households receiving services aimed to increase self-sufficiency (increase)	0	250		
<i>SS #8: Households Transitioned to Self Sufficiency*</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households transitioned to self-sufficiency (increase)	0	5		
<i>*Transitioned to self-sufficiency is defined as successful graduation from the program.</i>				

### Planned Significant Changes

No significant changes are planned.

## Activity #2022-01: Student Housing Initiative

### Plan Year Approved, Implemented, Amended

Approved FY 2022 and implemented FY 2023.

### Description/Update

The Housing Authority of Baltimore City 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.

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

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 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 the Form 50900.

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

HABC 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 2025. HABC will no longer accept referrals once the SHI program cap has been met.

## **Hardship**

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

#### Planned Non-Significant Changes

No non-significant changes are planned.

#### Planned Changes to Metrics/Data Collection

Metrics have been updated to reflect anticipated outcomes in FY 2025.

#### Metrics

<i>CE #4: Increase in Resources Leveraged</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Amount of funds leveraged in dollars (increase)	\$0.00	\$4,000  10 hours per household 10 households @ \$40/hour for supportive services		
<i>SS #5: Households Assisted by Services that Increase Self Sufficiency</i>				
Unit of Measurement	Baseline	Benchmark*	Outcome	Benchmark Achieved?
Number of households receiving services aimed to increase self-sufficiency (increase)	0	10 households		
<i>* Represents the number of households who leased units with vouchers issued under the SHI</i>				
<i>SS #8: Households Transitioned to Self Sufficiency*</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households transitioned to self-sufficiency (increase)	0	1 household		
<i>*Self-sufficiency is defined as graduation from college.</i>				

### **Planned Significant Changes**

No significant changes are planned.

## Activity #2022-02: Leasing Incentive Program

### Plan Year Approved, Implemented, Amended

Approved FY 2022 and implemented FY 2022.

### Description/Update

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

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

To support and encourage owner participation in the HCV program, the LIP will also provide vacancy and damage payments to owners payable under defined circumstances. HABC 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:

1. Required to move due to owner HQS violations; and
2. 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. 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.

- **Vacancy Loss Payments** will be made available to owners whose tenants vacate the unit without notice or HABC authorization, prior to the end of their 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 re-leasing of the unit.
- **Damage Loss Payments:** HABC will provide damage loss payments equivalent to the lowest of two months of HAP or \$3,000 for owners to cover costs, beyond normal wear and tear, which are not covered by the security deposit, provided that the owner agrees to lease the unit to another HCV client within 60 days from the date that the owner notifies HABC of the damages. HABC will not reimburse for tools needed to repair damages, landlord's personal time to repair damages or other activities related to the claim, items allegedly stolen, or damages not represented in a move-in/out condition report. Requests for damage claims must be submitted within 30 days of the tenant vacating the unit or owner re-taking possession. HABC will inspect the unit to validate the owner's damage claim.

**PH Leasing Incentive:** HABC will offer a one-time \$500 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 will no longer provide an incentive for a new unit which has been substantially rehabilitated. There were few requests for this incentive and the administrative burden in verifying the rehab was greater than the need for the incentive.

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

Metrics have been updated to reflect anticipated outcomes in FY 2025. The metric for HC #1 was revised to reflect planned new program units and program owners since the inception of the

activity. The metric for HC#5 was revised to reflect HCV households who leased new units in opportunity areas and/or units of new construction or substantial rehab and new accessible units where owners received a leasing incentive. This metric applies only to HCV and reflects units since inception of the activity.

## Metrics

<b>HC #1: Additional Units of Housing Made Available *</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of new housing units made available for households at or below 80% AMI as a result of this activity (increase)	0 units	HCV: 4,023 units  PH: 20 units		
<i>*HCV Metric reflects the planned incentives for all new program units and new program owners since the inception of the activity</i>				
<b>HC #3: Decrease in Wait List Time</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Average applicant time on wait list in months (decrease)	HCV: 8 years  PH: 7 years	HCV: 10 years  PH: 7 years		
<b>HC #5: Increase in Resident Mobility*</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of households able to move to a better unit and/or neighborhood of opportunity as a result of the activity (increase)	0 households	495 households		
<i>*Metric reflects incentives for HCV households who leased new units in opportunity areas and/or units of new construction or substantial rehab and new accessible units where owners received a leasing incentive. This metric applies only to HCV and reflects units since inception of the activity.</i>				

## Planned Significant Changes

No significant changes are planned.

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

### Plan Year Approved, Implemented, Amended

Approved FY 2024. Implementation Planned for 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 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.

Additionally, non-exempt 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.

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 the temporary hardship exemption will not exceed 90 days. A family can request an extension to the 90-day period if the hardship condition continues 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 the planning activities for the GROW program including preparation of the lease rider and conducting public meetings. In FY 2025 HABC anticipates approval and execution of the lease rider, completion of staff training and roll out of GROW to new and existing public housing residents.

#### Planned Non-Significant Changes

No non-significant changes are planned.

#### Planned Changes to Metrics/Data Collection

There are no changes to metrics or data collection.

#### Metrics

The metrics below reflect implementation of the GROW program for 2025.

<i>SS #1: Increase in Household Income*</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average household income of households affected by this policy in dollars (increase)	\$19,079	\$20,033		
<i>*Baseline represents average earned income for non-exempt households</i>				
<i>SS #3: Increase in Positive Outcomes in Employment Status</i>				
Unit of Measurement	Baseline*	Benchmark	Outcome	Benchmark Achieved?
Unemployed	2,846 62%	2,846 62%		

Employed PT or FT	1,767 38%	1,767 38%		
Enrolled in Education	TBD	TBD		
Enrolled in Job Training	TBD	TBD		
<i>Universe is non-exempt adults: 4,613</i> <i>*Baseline reflects data currently available in HABC's software for non-exempt adults. For data which is not currently available, HABC will update the baseline upon completion of the first year of the GROW program.</i>				
<b>SS #5: Households Assisted by Services that Increase Self-Sufficiency</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark*</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of non-exempt, non-wage income adults receiving services aimed to increase self-sufficiency (increase)	0	712		
<i>*Estimate of 25% of non-working, non-exempt households</i>				
<b>SS #7: Increase in Agency Rental Revenue*</b>				
<b>Unit of Measurement</b>	<b>Baseline **</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Total Household contributions towards housing assistance (increase)	\$354	\$372		
<i>*Represents average TTP for all non-exempt households.</i>				
<b>SS #8: Households Transitioned to Self Sufficiency*</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark**</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of households transitioned to self-sufficiency (increase)	0	0		
<i>*Self-sufficiency is defined as completion of an education or job training or commencement of employment for non-exempt, non-wage income adults.</i> <i>** Program implementation is slated for 2025.</i>				

### Planned Significant Changes

No significant changes are planned.



## 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

No non-significant changes are planned.

### Planned Changes to Metrics/Data Collection

Metrics have been updated to reflect anticipated outcomes in FY 2025.

### Metrics

Metrics have been updated to reflect 2025 planned outcomes.

CE #2: Staff Time Savings				
Unit of Measurement	Baseline	Benchmark*	Outcome	Benchmark Achieved?

Local Forms: Total time to complete the task in staff hours (decrease)	10,783 hours .5 hours per form x 21,566 HCV & PH households	5,014 hours .25 hours per form x 20,055 HCV & PH households		
<i>*Reflects the total number of planned HCV &amp; PH households. Baseline reset to reflect both programs.</i>				

### Planned Significant Changes

No significant changes are planned.

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

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

## **C. MTW Activities on Hold**

There are no approved activities on hold.

## D. Closed-Out MTW Activities

The following table summarizes previously approved MTW activities that HABC has completed, discontinued, or determined do not require MTW authority to implement. HABC will report on any additional activities, which have been closed out in the FY 2025 MTW Report.

**Table 10: Closed-Out MTW Activities**

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

Activity	Plan Year Approved and Implemented	Close Out Year	Reason for Close Out
HAP Contract Modifications (Activity #2009-05)	Approved: FY 2009  Implemented: FY 2010	FY 2019	Using MTW authority, HABC will allow for floating units instead of identifying specific units in the HAP contract in the Project-Based Voucher program. This previously HUD approved activity was closed out and combined with other previously HUD approved Project- Based Program activities. The combined activity is now called the Enhanced Project-Based Voucher Program (Activity #2006-02).
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 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.  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.
Utility Allowance for Families Living in Larger Units than Voucher Size (Activity #2010-04)	Approved: FY 2010  Implemented: FY 2012	FY 2014	Under the 2014 Appropriations Act, the rule on utility allowances changed to require that PHAs match the utility allowance payment to the actual unit size and not the voucher size. This MTW activity, approved in FY 2010, was incorporated into the Unit Size activity and implemented in FY 2012. Based upon the 2014 Appropriations Act language, HABC no longer needs to designate this activity as MTW.
Gilmor Self Sufficiency Initiative (Activity #2010-05)	FY 2010	FY 2017	This activity simplified the rent policy for staff and residents, and encouraged employment, job retention and wage progression. A shortage of funds to provide employment counseling forced the closure of this program in FY 2015, and the activity was closed out in FY 2017 when HABC became the recipient of a \$2.5 million Jobs Plus grant that provides employment counseling to public housing residents that otherwise could not be provided under MTW.

Activity	Plan Year Approved and Implemented	Close Out Year	Reason for Close Out
Rent Increase Determinations (Activity #2011-01)	FY 2011	FY 2016	This activity increased cost effectiveness in Federal expenditures by keeping program spending within budgetary limits. Suspending rent increase adjustments helped keep HCV Program spending within budgetary limits. Exceeding available funding had the potential to force HABC to withdraw assistance from a number of families causing a hardship for those families and property owners. This MTW activity was intended to keep spending within budgetary limits. It was closed out in FY 2016 since HABC was able to maintain budgetary limits without imposing suspension of rent increases to owners.
Asset Self-Certification (Activity #2011-02)	FY 2011	FY 2019	To streamline operations, HABC allowed residents to self-certify income from assets with total asset values per household of less than \$5,000. The Asset Self-Certification activity was approved by HUD in FY 2011. HABC closed out this activity and re-proposed it in FY 2019 as part of the Rent Simplification activity. This action allows HABC to report on all Rent Simplification activity features under one activity.
Direct Homeownership Program (Activity 2012-02)	2012	2019	The direct purchase second mortgage program was intended for applicants with incomes of no less than \$18,000 per year. Participants in this initiative would not receive a Section 8 homeownership voucher. A soft second mortgage of HOME VI funds would also be available. The direct purchase second mortgage program was targeted to applicants with incomes of no less than \$18,000 per year. Participants in this initiative would not receive a Section 8 homeownership voucher. A soft second mortgage of HOME VI funds was to be made available through this program. The activity was closed out due to lack of participation.
Rent Policy (Activity #2012-03)	FY 2012	FY 2015	HABC received HUD approval in FY 2012 to implement an Agency-wide rent policy adopted for Gilmore Homes; however, due to lack of funding and the on-going revisions of the Gilmore Homes rent policies, this activity was placed on hold in FY 2014. This activity was identical to the Gilmore Homes Demonstration Program and was implemented at the remaining HABC sites. A shortage of funds to provide employment counseling forced the closure of this program in FY 2015.
Adjusted Income for Thompson Participants (Activity #2012-04)	FY 2012	FY 2019	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.

Activity	Plan Year Approved and Implemented	Close Out Year	Reason for Close Out
			<p>There is a standard deduction for working families, disabled families and non-disabled families without wages. The deductions replace all other regulatory deductions. The deductions are:</p> <ul style="list-style-type: none"> <li>• \$3,200 for households with wages</li> <li>• \$1,200 for households without wages</li> <li>• \$400 for any elderly or disabled family (to be combined with either of the above deductions)</li> </ul> <p>This activity was closed out in FY 2019 and combined with other previously HUD approved rent simplification activities for the Thompson units. The combined activity is now call Rent Simplification – Thompson (Activity #2012-01).</p>
Adoption of New Investment Policies for HABC (Activity #2013-01)	<p>Approved: FY 2013</p> <p>Not Implemented</p>	FY 2015	In FY 2013, HABC proposed adopting new investment policies, thereby increasing investment revenue and decreasing the federal expenditures necessary to carry out the federal program. For example, if the investment revenue is increased by \$100,000 due to a more favorable investment rate of return, this increased revenue can be used to offset the OPEB liability. HABC decided not to implement this activity due to the terms of a General Depository Agreement with the State. This activity was never implemented.
Journey Home (Activity #2013-02)	FY 2013	FY 2017	Under this activity, HABC exercised its MTW fund flexibility in order to use MTW Block Grant Funds as housing subsidy for participants in the Journey Home Program. The Journey Home Program was closed in FY 2016 and the activity was closed out in FY 2017.
Exclude Income from Full-Time Students and Adopted Household Members (Activity #2014-02)	FY 2014	FY 2019	Using MTW authority, HABC modified the definition of annual income by excluding FT student earned income and adoption assistance income for families living in Thompson units. These exclusions were part of an effort to support economic self-sufficiency as well as to streamline program administration. As 100% of the income from these two sources is excluded, third party verification of income is not required. This activity was approved and implemented in FY 2014. This activity was closed out in FY 2019 and combined with other previously HUD approved rent simplification activities for the Thompson units. The combined activity is now called Rent Simplification – Thompson (Activity #2012- 01).
Encouraging Leasing in Higher Opportunity Neighborhoods	<p>Approved: FY 2015</p> <p>Not</p>	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

Activity	Plan Year Approved and Implemented	Close Out Year	Reason for Close Out
(Activity #2015-01)	Implemented		participating households who requested program moves. HABC, on a case-by-case basis, made exceptions to this policy as a reasonable accommodation. This MTW activity was planned for implementation in FY 2015. However, upon further consideration, BRHP decided not to implement this activity and it was closed out in FY 2016.
Energy Conservation Utility Allowance (Activity #2015-02)	FY 2015	FY 2016	HABC provides a Utility Allowance to households responsible for payment of utilities for water, electricity, gas, other heating, cooking fuels and sewage services. In an effort to reinforce energy conservation activities and reduce the cost of water/sewage utility allowances, HABC will encourage the completion of a water audit and use of low-flow toilets by HCV tenants and landlords/owners. This MTW activity was placed on hold due to comments from the public and closed out in FY 2016.
The Front Door Program (Activity #2015-03)	FY 2015	FY 2017	HABC partnered with The Mayor's Office of Human Services/Homeless Services Program, Sarah's Hope (a shelter for the homeless) and St. Vincent De Paul to provide MTW Block Grant funds to the Front Door Program to rapidly house 36 homeless families for up to one year using two distinct strategies. The contract ended December 31, 2014, six months into HABC's FY 2015, and was not renewed, which resulted in closure of the activity.
Project Based Voucher Amendments to the HAP Contract (Leased Housing) (Activity #2015-04)	FY 2015	FY 2019	Using its MTW authority, HABC waived the three-year contract amendment restriction, which will allow HABC to amend the HAP contract at any time during the initial term of the HAP contract and during any renewal term of the HAP contract. Under this activity, HABC may exercise this option for all PBV units, including, but not limited to the Bailey LTA and PBV units and the non- Bailey LTA PB units. This activity was previously on hold and was approved in FY 2015. HABC closed out this activity and combined it with other previously HUD approved Project Based program activities. The combined activity is now called the Enhanced Project-Based Voucher Program (Activity #2006-02).
Security Deposit Assistance (Activity #2017-02)	FY 2017	FY 2019	Under this activity, BRHP will use HAP funds for payment to landlords to cover a security deposit for Baltimore Housing Mobility Program participants leasing in a census tract designated "opportunity" by BRHP. Subject to funding availability, BRHP will offer each participant this Security Deposit Assistance on a one-time basis, and only if that participant has repaid the entire balance of any previously grant-funded Security Deposit Assistance Loan and is otherwise in good standing with BRHP. The Security Deposit



Activity	Plan Year Approved and Implemented	Close Out Year	Reason for Close Out
			Assistance will not exceed the equivalent of one-month's rent and BRHP will require a participant contribution towards the security deposit of between \$200 and \$500 dollars, which will be adjusted seasonally to encourage leasing in summer months. This activity was approved and implemented in FY 2017. HABC closed out this activity and combined it with other previously HUD approved Mobility Program Enhancement activities. HABC also modified this activity in FY 2019 under the previously approved Mobility Enhancement activity.
Sponsor-Based Project-Based Transitional Housing (Activity # #2017-01)	FY 2017	FY 2021	HABC partnered with the Women's Housing Coalition to provide permanent housing for up to 25 homeless, hard-to-house families. A HAP Contract has been signed for up to 15 years with the option to renew; all families are housed and receiving supportive services allowing this activity to be closed out.
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 2025.

### A. Estimated Sources and Uses of MTW Funds in FY 2025

#### i. Estimated Sources of MTW Funds

Table 11: Estimated Sources of MTW Funding for FY 2025

FDS Line Item Number	FDS Line Item Name	Dollar Amount
70500 (70300+70400)	Total Tenant Revenue	20,784,754
70600	HUD PHA Operating Grants	469,191,336
70610	Capital Grants	19,813,137
70700 (70710+70720+70730+70740+70750)	Total Fee Revenue	-
71100+72000	Interest Income	1,797,412
71600	Gain or Loss on Sale of Capital Assets	-
71200+71300+71310+71400+71500	Other Income	1,050,395
<b>70000</b>	<b>Total Revenue</b>	<b>512,637,034</b>

#### 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 2025.
- HABC's Total Operating Grants of \$469,191,336 from HUD include the following funding estimates:
  - HCV Housing Assistance Payments (HAP) subsidies in the amount of \$366,851,237, which includes \$76 million in MTW/HAP HUD held reserve funds;
  - Ongoing Administrative Fee Earned in the amount of \$21,241,434; and
  - Public Housing Subsidies of \$81,098,665, which is budgeted based on an estimated 90% funding proration for the calendar year ending December 31, 2025.

- Capital Grants funding of \$19,813,274 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 2025**

FDS Line Item Number	FDS Line Item Name	Dollar Amount
91000 (91100+91200+91400+91500+91600+91700+91800+91900)	Total Operating – Administrative	51,143,488
91300+91310+92000	Management Fee Expense	13,302
91810	Allocated Overhead	(423,822)
92500 (92100+92200+92300+92400)	Total Tenant Services	3,103,880
93000 (93100+93600+93200+93300+93400+93800)	Total Utilities	23,931,228
93500+93700	Labor	
94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	31,647,012
95000 (95100+95200+95300+95500)	Total Protective Services	3,880,630
96100 (96110+96120+96130+96140)	Total Insurance Premiums	3,409,691
96000 (96200+96210+96300+96400+96500+96600+96800)	Total Other General Expenses	11,630,197
96700 (96710+96720+96730)	Total Interest Expense and Amortization Cost	2,125,345
97100+97200	Total Extraordinary Maintenance	500,000
97300+97350	Housing Assistance Payments + HAP Portability-In	288,451,237
97400	Depreciation Expense	16,252,002
97500+97600+97700+97800	All Other Expenses	1,029,846
<b>90000</b>	<b>Total Expenses</b>	<b>436,694,036</b>

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

Total Expenses	436,694,036
Less: Depreciation Expense	(16,252,002)
Capital Hard Cost	92,195,000
MTW Uses of Funds	512,637,034

**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 staff 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 2025 are included in Appendix B.
- Tenant Services includes salaries, benefits, materials and supplies used to support tenant councils and the Resident Advisory Board, and to provide direct services to residents of public housing.
- Utilities include expenses for water, electricity, gas, steam and fuel consumed by HABC's AMPs. HABC continues to exercise prudent procurement actions to achieve favorable utility rates. Utility consumptions are adjusted based on addition or demolition activities planned for the fiscal year.
- Ordinary Maintenance includes salaries and benefits of maintenance workers assigned to public housing units. It also includes maintenance materials and maintenance contracts used for ordinary maintenance operations. This category also includes outside contract

costs to privatized firms, which manage some of HABC's public housing and affordable housing units and use of MTW/HAP funds for vacancy renovations.

- Protective Services includes outside security contracts for the developments.
- Insurance Premiums are budgeted for properties, general liability, worker's compensation, automobiles, commercial crime, EDP data and media, boiler and machinery for the MTW activities.
- Other General Expenses include compensated absences, collection losses for uncollected rent and Payment in Lieu of Taxes (PILOT) and use of MTW/HAP funds.
- Interest Expense is budgeted for interest associated with the EPC Debt Service.
- Extraordinary Maintenance includes Casualty Loss, which is estimated for unforeseen repairs and losses at public housing units that are not covered by insurance carriers.
- HAPs include rent subsidies paid to landlords and utility assistance paid to tenants under the Section 8 HCV program.

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

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

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 \$20.5 million for construction and acquisition costs in support of HABCs strategic plan goals
- Up to \$15 million for internet connectivity

- Up to \$10 million in support of maintenance activities in existing units
- Up to \$13.5 million for renovation and rehabilitation of existing HABC properties
- Up to \$350,000 thousand for renovations for renovations to state aided PBV units
- Up to \$5 million for modernization activities
- Up to \$3.5 million for agency fleet replacement
- Up to \$2.5 million for Protective Services measures

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

**Table 13: Planned Unspent Operating Fund and HCV Funding**

Original Funding Source	Beginning of FY 2025 – Unspent Balances, Including HUD-Held Reserves	Planned Application of PHA Unspent Funds During FY 2025
HCV HAP*	\$ 178,986,941	\$ 76,000,000
HCV Admin Fee	\$ 16,566,450	\$
PH Operating Subsidy	\$ 44,887,118	\$
<b>TOTAL:</b>	<b>\$ 240,440,509</b>	<b>\$76,000,000</b>

\* 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.	Development Activities	\$20,500,000	HAP Reserves	1/1/25 – 12/31/25
2.	Internet Connectivity	\$15,000,000	HAP Reserves	1/1/25 – 12/31/25
3.	Vacancy Renovations	\$19,500,000	HAP Reserves	1/1/25 – 12/31/25
4.	Maintenance Activities	\$10,000,000	HAP Reserves	1/1/25 – 12/31/25
5.	Modernization Activities	\$5,000,000	HAP Reserves	1/1/25 – 12/31/25
6.	Vehicle Replacements	\$3,500,000	HAP Reserves	1/1/25 – 12/31/25
7.	Protective Services	\$2,500,000	HAP Reserves	1/1/25 – 12/31/25

## C. 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 2025 are included in Appendix B. The indirect cost rate for 2025 will be approximately 13.28% for MTW programs and 12.71% for Non-MTW programs.

## D. Rental Assistance Demonstration (RAD) Participation

Table 15 includes RAD conversions which have closed or are projected to close by the end of FY 2024. Table 16 includes RAD conversions which are slated for conversion in FY 2025 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 2025 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 2024**

Property Name	No. 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	206	Blend of RAD PBV and PBV 62 RAD PBV 144 PBV	10/2024 Estimate	RAD RCC received	12/31/2022	07/11/2023

Property Name	No. of Units Converted	RAD Conversion Type	Dated Closed	Major Milestone/Status	RAD Significant Amendment Submission Date*	RAD Significant Amendment Approval Date
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
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
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
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



Property Name	No. of Units Converted	RAD Conversion Type	Dated Closed	Major Milestone/Status	RAD Significant Amendment Submission Date*	RAD Significant Amendment Approval Date
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
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 of Terrace	202	RAD PBV & PBV Blend	10/2024 Estimate	RADD RCC received	12/31/2022	07/11/2023
Union Ave. – Buena Vista Apartments	48	PBV Part II	10/2018	HUD approved certification of completion	6/20/2018	8/10/2018

Property Name	No. of Units Converted	RAD Conversion Type	Dated Closed	Major Milestone/Status	RAD Significant Amendment Submission Date*	RAD Significant Amendment Approval Date
Wyman House	168	PBRA	12/2015	HUD approved certification of completion	5/12/2015	10/27/2015
Total	4,502					

The table below identifies projects that are anticipated to be converted under RAD in FY 2025 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 2025 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 likely to take place after 2025
Albemarle Apartments	4	RAD PBV	No	RAD conversion likely to take place after 2025
Carey House	23	RAD PBV or Blend of RAD PBV and PBV	Yes	RAD conversion will take place in the first quarter of 2025
Dukeland	30	RAD PBV or Blend of RAD PBV and PBV	Yes	RAD conversion likely to take place after 2025
Laurens House	36	RAD PBV or Blend of RAD PBV and PBV	Yes	RAD conversion likely to take place in the first quarter of 2025
McCulloh Homes	556	RAD PBV or Blend of RAD PBV and PBV	Yes	RAD conversion likely to take place after 2025
O'Donnell Heights	230	RAD PBV or Blend of RAD PBV and PBV	No	RAD conversion likely to take place after 2025

Property Name	RAD Units	RAD Conversion Type	CHAP Received (Yes/No)	Major Milestones
Poe Homes	288	RAD PBV or Blend of RAD PBV and PBV	Yes	Developer selected & MDA executed; Choice Neighborhood Transformation Plan submitted to HUD on 9/3/2020; HUD approved the Poe Transformation Plan on January 5, 2021. HABC submitted demo/dispo application in 2023 and may submit CNI Implementation Grant application in 2024.
Renaissance at Reservoir Hill	40	RAD PBV or Blend of RAD PBV and PBV	No	RAD conversion likely to take place in 2025
Sharp Leadenhall	23	RAD PBV or Blend of RAD PBV and PBV	No	RAD conversion likely to take place in 2025
<b>TOTAL</b>	<b>1,337</b>			

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

Yes

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

Appendix L:

- Reservoir Hill 2: First RAD Significant Amendment
- Sharp Leadenhall: First RAD Significant Amendment

## **VI. Administrative**

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

A Resolution approving the FY 2025 MTW Annual Plan and the MTW Plan Certifications of Compliance will be attached (Appendix D and Appendix E). HABC will also attach a Certification of Consistency with the Consolidated Plan (Appendix F).

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

HABC provided public notice of the FY 2025 MTW Annual Plan and posted the Plan on its website. A 30-day public comment period to allow for resident and general public review will be provided from August 27, 2024 through September 27, 2024. A public hearing will be held on September 24, 2024 at Pleasant View Gardens at 4:30 PM. Additionally, HABC met with the Resident Advisory Board on 8/22/2024 and will hold community meetings at different developments to review the Plan. Copies of Advertisements, attendance sheets, written comments, public hearing comments and HABC responses for submission to HUD can be found in Appendices G, H and I.

### **C. Planned & Ongoing Evaluations**

HABC will continue to monitor and evaluate MTW activities during FY 2025. 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 2024. 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 2025

SOURCES	
FDS Line Item Name	Dollar Amount
Tenant Revenue	1,756,828
HUD PHA Operating Grants	13,452,320
Capital Grants	4,533,194
Total Fee Revenue	-
Interest Income	-
Gain or Loss on Sale of Capital Assets	-
Other Income	13,627,313
<b>Total Revenue</b>	<b>33,369,655</b>

#### Notes to Sources:

1. Total Tenant Revenue of \$1,756,828 is for PRHP market rate units managed by HABC's privatized firms.
2. HUD Operating Grants include the following:
  - Housing Assistance Payments (HAP) subsidies planned for Other HCV programs in the amount of \$13,299,650
  - Ongoing Administrative Fees Earned estimated in the amount of \$152,670
3. Capital Grants includes:
  - \$4,533,194 for CNI grant
4. Other Income includes the following:
  - HABCo's construction and maintenance activities \$1,616,578.
  - Market rate activities \$9,313
  - City of Baltimore reimbursement of pass-through activities \$8,375,000.
  - Resident Services activities \$2,056,415
  - Planning & Development activities \$1,570,007

#### Estimated Uses of Non- MTW Funding for FY 2025

USES	
FDS Line Item Name	Dollar Amount
Total Operating – <i>Administrative</i>	3,858,622
Management Fee Expense	110,553
Allocated Overhead	423,822
Total Tenant Services	1,969,634
Total Utilities	394,029
Labor	-
Total Ordinary Maintenance	9,492,857
Total Protective Services	36,130
Total Insurance Premiums	611,346
Total Other General Expenses	353,735

USES	
FDS Line Item Name	Dollar Amount
Total Interest Expense and Amortization Cost	-
Total Extraordinary Maintenance	-
Housing Assistance Payments	13,299,650
Depreciation Expense	175,293
All Other Expenses	-
<b>Total Expenses</b>	<b>30,725,671</b>

Total Expenses	30,725,671
Less: Depreciation Expense	(175,293)
Hard Cost	3,740,395
<b>Non-MTW Uses of Funds</b>	<b>34,290,773</b>

Uses of Fund exceed Sources of Fund by \$921,118 which will be supported by non-ACC reserves.

#### Notes to Uses:

1. Administrative expenses include salaries and benefits to administer the Non-MTW programs. Also included in this expense category are office supplies, telephone, postage, and other computer materials and contracts.
2. Allocated Overhead is calculated based on HUD's approved Local Asset Management Program since FY 2010. The proposed updated cost allocation calculations for CY 2025 are included in Appendix C.
3. Tenant Services include salaries and benefits of employees for the Resident Services grants and includes other materials and services as required by the grant agreements.
4. Ordinary Maintenance expenses are related to the City of Baltimore pass-through (non-capitalized) activities being performed by HABC's force-labor department (HABCo). HABC receives reimbursement from the City for these activities, PRHP units, maintenance for HABC's non-ACC properties and maintenance of spaces occupied by Tenant Svcs grant personnel.
5. Other General Expenses include PILOT, applicable portions of compensating absence for the non-MTW programs, bad debt and RFR for HABC's market rate units.

6. Housing Assistance Payments (HAPs) include rent subsidies paid to landlords and utility assistance paid to tenants of Other HCV programs.



## Appendix B: Local Asset Management Plan

### **HABC CY24 Indirect Cost Rate Explanation, A component of HABC's Local Asset Management Plan**

This cost allocation plan and process for Calendar Year 2025 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;
- 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;
- 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 2024 Approved Consolidated Budget. Based on this budget and the attached schedule, **the indirect cost rate for CY 2025 will be 13.28% for MTW and 12.71% for non-MTW (see Attachment A for detail).**

**Appendix B: Local Asset Management Plan (Attachment A)**  
**Calculation of Indirect Cost Rate FY 2025**  
**(cont'd)**

<u>Direct</u>	<u>OFR</u> <u>Treatment</u>	<u>FY23</u>	<u>FY24 Budget for FY25</u>	<u>Change</u>	<u>Share</u>	<u>MTW</u>	<u>Non-MTW</u>	<u>OH Limit</u>	<u>OH shortfall</u>
Sites (LIPH)	Dir	55,386,297	61,008,283	10.2%	12.0%	61,008,283			
Sites PVT	Dir	4,382,897	2,286,740	-47.8%	0.5%	2,286,740			
Sites (CFP hard-includes ECI)	Dir	15,532,191	15,718,303	1.2%	3.1%	15,718,303			
Sites (CFP soft - includes ECI)	Dir	3,942,248	3,233,250	-18.0%	0.6%	3,233,250			
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	2,793,454	3,257,604	16.6%	0.6%	3,257,604			
HCVP HAP	Dir	321,057,779	288,534,764	-10.1%	57.0%	273,794,009	14,740,755		
Non-HAP Hard			50,000,000	0.0%	9.9%	50,000,000			
Non HAP Soft			10,000,000	0.0%	2.0%	10,000,000			
HCVP Admin	Dir	12,242,888	16,854,997	37.7%	3.3%	16,702,327	152,670		
BRHP Admin		6,117,936	4,904,845	-19.8%	1.0%	4,904,845			
Development Hard/HOPE VI	Dir	3,181,577	4,875,624	53.2%	1.0%		4,875,624		
Development Soft	Mixed	2,441,390	2,032,648	-16.7%	0.4%		2,032,648		
DHCD Hard	Dir	3,075,000	4,025,000	30.9%	0.8%		4,025,000		
DHCD Soft	Mixed	-	-	0.0%	0.0%		-		-
Other Non-MTW		121,803	242,154	98.8%	0.0%		242,154		
RAB	Dir	185,539	355,794	91.8%	0.1%	355,794			
Res Serv - LIPH	Frontline	2,389,690	2,472,537	3.5%	0.5%	2,472,537			
Res Serv - Grants	Frontline	1,392,024	2,074,367	49.0%	0.4%		2,074,367	207,437	30,369
Facilities Non ACC Properties		200,000	200,000	0.0%	0.0%		200,000		
Energy	Frontline	903,549	1,882,046	108.3%	0.4%	1,882,046			
F&A Frontline		85,461	83,208	-2.6%	0.0%	83,208			
FHEO Front Line		96,318	109,385	13.6%	0.0%	109,385			
HABCO Hard	Dir	-	-	0.0%	0.0%	-			
HABCO Soft	Frontline	1,400,778	1,420,596	1.4%	0.3%		1,420,596		
Admissions & Leasing	Frontline	1,763,128	1,638,174	-7.1%	0.3%	1,638,174			
Housing Management	Frontline	3,298,795	1,945,500	-41.0%	0.4%	1,945,500			
Home Ownership	Frontline	121,572	314,393	158.6%	0.1%	314,393			
Legal, Lease enforcement	Frontline	-	-	0.0%	0.0%				
MPA	Frontline	1,166,769	1,275,802	9.3%	0.3%	1,275,802			
Private Management Operations	Frontline	-	742,487	0.0%	0.1%	742,487			
Strategy & Compliance	Frontline	-	648,316	0.0%	0.1%	648,316			
Relocation	Frontline	500,000	501,562	0.3%	0.1%	501,562			
Security Operations	Frontline	-	500,000	0.0%	0.1%	500,000			
Work Order Ctr.	Frontline	-	-	0.0%	0.0%	-			
Fund 113	Dir	1,681,964	1,729,847	2.8%	0.3%		1,729,847		
Undesignated/Legacy	Frontline	6,463,757	5,819,308	-10.0%	1.1%	5,819,308			
Legal FL	Frontline	-	-	0.0%	0.0%				
Less AMP/FL planned cuts	FL/Dir	-	-	0.0%	0.0%	-			
<b>Subtotal Direct</b>		<b>451,924,804</b>	<b>490,687,535</b>	<b>8.6%</b>	<b>96.9%</b>	<b>459,193,873</b>	<b>31,493,661</b>	<b>207,437</b>	<b>30,369</b>

**Appendix B: Local Asset Management Plan (Attachment A)**  
**Calculation of Indirect Cost Rate FY 2025**  
**(cont'd)**

<i>Less: Non-Relevant Expenses</i>									
Hard Cost (Devel, HABCO, Non HAP)	18,713,768	70,593,927	277.2%		65,718,303	4,875,624			
HAP	321,057,779	288,534,764	-10.1%		273,794,009	14,740,755			
BRHP	6,117,936	4,904,845	-19.8%		4,904,845	-			
Development Soft		-	0.0%						
ORS Grants	1,392,024	2,074,367	49.0%		-	2,074,367			
Debt Service		-	0.0%		-				
Facilities	200,000	200,000	0.0%		-	200,000			
Fund 113		-	0.0%						
DHCD Hard cost	3,075,000	4,025,000	30.9%		-	4,025,000			
RAD Deduct (out in 20) *	-	-	0.0%			-			
<b>Subtotal Direct</b>	<b>101,368,297</b>	<b>120,354,632</b>	<b>18.7%</b>		<b>114,776,716</b>	<b>5,577,915</b>	<b>207,437</b>	<b>30,369</b>	
					95%	5%			
									<b>Total Program Cost</b>
			<b>Change</b>		<b>MTW Direct</b>	<b>Non-MTW Dir</b>	<b>MTW Indir</b>	<b>Non-MTW Ind</b>	<b>(Direct + Indirect)</b>
Low Rent	79,659,029	85,083,293	6.8%		84,841,139	242,154	11,272,475	32,087	96,387,855
CFP/RHF	3,942,248	3,233,250	-18.0%		3,233,250	-	428,431	-	3,661,681
HCVP	12,242,888	16,854,997	37.7%		16,702,327	152,670	2,213,187	20,230	19,088,414
Non-HAP Soft		10,000,000	0.0%		10,000,000	-			
Devel	2,441,390	2,032,648	-16.7%		-	2,032,648	-	269,342	2,301,990
HABCO	1,400,778	1,420,596	1.4%		-	1,420,596		188,240	1,608,836
DHCD	-	-	0.0%				-	-	-
Grants			0.0%		-	-	-	207,437	207,437
EPC	-	-	0.0%		-	-	-	-	-
Biz Activities	1,681,964	1,729,847	2.8%		-	1,729,847	-	229,218	1,959,065
	<b>101,368,297</b>	<b>120,354,632</b>	<b>18.7%</b>		<b>114,776,716</b>	<b>5,577,915</b>	<b>13,914,093</b>	<b>946,554</b>	<b>125,215,278</b>

## Appendix B: Local Asset Management Plan (Attachment A)

### Calculation of Indirect Cost Rate FY 2025

(cont'd)

<i>Indirect</i>								
Admin Services	COCC	365,547	350,704	-4.1%	0.1%			
Audits	COCC			0.0%	0.0%			
Budgets	COCC	615,481	733,485	19.2%	0.1%			
CAO	COCC	369,323	354,080	-4.1%	0.1%			
CFO	COCC	487,951	698,093	43.1%	0.1%			
Agency Wide	COCC			0.0%	0.0%			
Communications	COCC	1,282,304	1,353,696	5.6%	0.3%			
COO	COCC	505,523	389,310	-23.0%	0.1%			
CEO	COCC	774,309	1,111,329	43.5%	0.2%			
Facilities/Bldg. Support	COCC	1,234,409	1,347,386	9.2%	0.3%			
FHEO	COCC	590,845	602,596	2.0%	0.1%			
Finance & Accounting	COCC	1,670,880	1,722,789	3.1%	0.3%			
HousingStat	COCC			0.0%	0.0%			
Human Resources	COCC	1,824,392	1,852,738	1.6%	0.4%			
IT	COCC	2,101,632	2,400,061	14.2%	0.5%			
Inspector General	COCC	599,497	678,346	13.2%	0.1%			
Legal - attorneys	COCC	1,713,584	1,838,001	7.3%	0.4%			
P&D	COCC			0.0%	0.0%			
Procurement	COCC	702,794	894,730	27.3%	0.2%			
Anticipated BAHD Chargebacks			(379,426)	0.0%	-0.1%			
Legacy costs	COCC	-	-	0.0%	0.0%			
5% Salary Addback	COCC			0.0%				
Anticipated cuts COCC	COCC			0.0%				
<b>Subtotal Indirect</b>		<b>14,838,471</b>	<b>15,947,918</b>	<b>7.5%</b>	<b>3.1%</b>	<b>15,208,801</b>	<b>739,117</b>	
<b>Indirect Rate</b>		<b>14.64%</b>	<b>13.25%</b>					
<b>Program totals (Dir + Ind)</b>		<b>116,206,768</b>	<b>136,302,550</b>	<b>17.3%</b>				
<b>Indirect Cost Rate (I/D) - blended</b>					<b>13.3%</b>	<b>13.25%</b>	<b>13.25%</b>	
<b>TOTAL</b>		<b>466,763,275</b>	<b>506,635,453</b>	<b>8.5%</b>	<b>100.0%</b>	<b>474,402,674</b>	<b>32,232,778</b>	
<i>Reallocation of non-allocable overhead</i>						95%	5%	
Total Indirect Charges		<b>14,838,471</b>	<b>15,947,918</b>	<b>7.5%</b>	<b>3.1%</b>	<b>15,239,170</b>	<b>708,748</b>	
<b>Total Program Indirect Rate</b>						<b>13.28%</b>	<b>12.71%</b>	
Tot Exp. per Sources and Uses File		466,763,275	506,366,562					
Overall Proof		466,763,275	506,635,453					
Anticipated cuts		-	-					
Variance		0	(268,890)					
Final Variance				0.0%				

## Appendix C: Asset Management Table

Property Name & AMP	ACC Units	Note for FY 2025 Plan	Development Activities	Demolition/ Disposition Activities*	Conversion Activities
<b>Conventional Public Housing</b>					
Brooklyn Homes MD002000021	482	Feasibility analysis underway to determine next steps for redevelopment/rehabilitation plan.			
Cherry Hill Homes MD002000011	1,281	Feasibility analysis underway to determine next steps for redevelopment/rehabilitation plan.			
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	Tax credit application submitted for Keys Pointe Phase II.	Possible PBV RAD and/or PBV blend conversion	HABC will submit a demolition application for the remaining 230 units	

Property Name & AMP	ACC Units	Note for FY 2025 Plan	Development Activities	Demolition/ Disposition Activities*	Conversion Activities
Poe Homes MD002000004	288	Plan to submit FY24 CNI Grant Application	Planned PBV RAD and/or PBV blend conversion		
Westport Homes MD002000022	252	Feasibility analysis underway to determine next steps for redevelopment/rehabilitation plan.			
<b>Mixed Developments w/HABC-Owned ACC Units</b>					
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			Planned disposition/demolition application.	
Shipley Hills	24			Planned disposition/demolition application.	
St. Ambrose MD002000116	30				
West Hills Square MD002000113	11				
<b>Scattered Sites</b>					
Scattered Sites 200 MD002000200	192	Renovation of the following units in Johnson Square: <b>E. Biddle St.:</b> 916; 918 (Units 1 & 2); 928; 930; 932; 940; 1002; 1021; 1027 <b>E. Chase St.:</b> 801; 823 (Units A & B); 825; 837; 947	Planned modernization, rehabilitation of Johnston Square units with MTW funds. Continue rehab of viable vacant units, evaluate inventory as units become vacant	Demo/Disposition of nonviable scattered sites 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 2025 Plan	Development Activities	Demolition/ Disposition Activities*	Conversion Activities
		<b>E. Eager St.:</b> 1202; 1208; 1216; 1236 <b>Greenmount Ave.:</b> 1209; 1211; 1225; 1227; 1229; 1231; 1233 <b>Mura St.:</b> 713; 715; 727 <b>E. Preston St.:</b> 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 <b>Valley St.:</b> 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.		



Property Name & AMP	ACC Units	Note for FY 2025 Plan	Development Activities	Demolition/ Disposition Activities*	Conversion Activities
			Continue rehab of viable vacant units, evaluate inventory as units become vacant		
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 on 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		
<b>RAD Conversions**</b>					
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 2024	Planned Rehabilitation utilizing a Section 18 RAD PBV/TBV Blend.	Section 18 Disposition.	Section 18 RAD PBV/TBV Blend.
Carey House	23	Planning for RAD Conversion in 2025	Planned conversion to RAD PBV		RAD PBV Conversion
Dukeland	30	Planning for RAD Conversion	Planned conversion to RAD PBV.		RAD PBV Conversion
Laurens House	36	Planning for RAD Conversion in 2024	Planned conversion to RAD PBV.		RAD PBV Conversion

Property Name & AMP	ACC Units	Note for FY 2025 Plan	Development Activities	Demolition/ Disposition Activities*	Conversion Activities
Perkins Homes	493			Planned Section 18 Disposition.	
Renaissance at Reservoir Hill	40	Planned conversion to RAD PBV in 2025	Planned rehabilitation using MTW Funds.		RAD PBV Conversion
Sharp Leadenhall	23	Planned conversion to RAD PBV in 2025	Planned rehabilitation using MTW Funds. Plan conversion to RAD PBV		RAD PBV Conversion
Townes at the Terraces	202	Planned RAD Section 18 Blend conversion in 2024.	Planned Rehabilitation utilizing a Section 18 RAD PBV/TBV Blend.	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 Included After the Public Comment Period**

## Appendix E: Certification of Compliance

### To be signed after Public Comment Period

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

CERTIFICATIONS OF COMPLIANCE	
<b>U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT</b> <b>OFFICE OF PUBLIC AND INDIAN HOUSING</b> <b>Certifications of Compliance with Regulations:</b> <b>Board Resolution to Accompany the Annual Moving to Work Plan</b>	
Acting on behalf of the Board of Commissioners of the Moving to Work Public Housing Agency (MTW PHA) listed below, as its Chair or other authorized MTW PHA official if there is no Board of Commissioners, I approve the submission of the Annual Moving to Work Plan for the MTW PHA Plan Year beginning (01/01/2025), hereinafter referred to as "the Plan", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:	
(1) The MTW PHA published a notice that a hearing would be held, that the Plan and all information relevant to the public hearing was available for public inspection for at least 30 days, that there were no less than 15 days between the public hearing and the approval of the Plan by the Board of Commissioners, and that the MTW PHA conducted a public hearing to discuss the Plan and invited public comment.	
(2) The MTW PHA took into consideration public and resident comments (including those of its Resident Advisory Board or Boards) before approval of the Plan by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the Annual MTW Plan.	
(3) The MTW PHA certifies that the Board of Directors has reviewed and approved the budget for the Capital Fund Program grants contained in the Capital Fund Program Annual Statement/Performance and Evaluation Report, form HUD-50075.1 (or successor form as required by HUD).	
(4) The MTW PHA will carry out the Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990.	
(5) The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.	
(6) The Plan contains a certification by the appropriate state or local officials that the Plan is consistent with the applicable Consolidated Plan.	
(7) The MTW PHA will affirmatively further fair housing by fulfilling the requirements set out in HUD regulations found at Title 24 of the Code of Federal Regulations, including regulations in place at the time of this certification, and any subsequently promulgated regulations governing the obligation to affirmatively further fair housing. The MTW PHA is always responsible for understanding and implementing the requirements of HUD regulations and policies and has a continuing obligation to affirmatively further fair housing in compliance with the 1968 Fair Housing Act, the Housing and Community Development Act of 1974, The Cranston-Gonzalez National Affordable Housing Act, and the Quality Housing and Work Responsibility Act of 1998. (42 U.S.C. 3608, 5304(b)(2), 5306(d)(7)(B), 12705(b)(15), and 1437C-1(d)(16)). The MTW PHA will affirmatively further fair housing by fulfilling the requirements at 24 CFR 903.7(o) and 24 CFR 903.15, which means that it will take meaningful actions to further the goals identified in its Analysis of Impediments to Fair Housing Choice(AI),Assessment of Fair Housing (AFH), and/or other fair housing planning documents conducted in accordance with the requirements of 24 CFR Part 5, that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing, and that it will address fair housing issues and contributing factors in its programs, in accordance with 24 CFR 903.7(o), and will address impediments to fair housing choice identified in its AI, AFH, and/or other fair housing planning documents associated with any applicable Consolidated or Annual Action Plan under 24 CFR Part 91.	
(8) The MTW PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975 and HUD's implementing regulations at 24 C.F.R. Part 146.	
(9) In accordance with 24 CFR 5.105(a)(2), HUD's Equal Access Rule, the MTW PHA will not make a determination of eligibility for housing based on sexual orientation, gender identity, or marital status.	
(10) The MTW PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.	
(11) The MTW PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 75.	

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

- (12) The MTW PHA will comply with requirements with respect to a drug free workplace required by 24 CFR Part 24, Subpart F.
- (13) The MTW PHA will comply with requirements with respect to compliance with restrictions on lobbying required by 24 CFR Part 87, together with disclosure forms if required by this Part, and with restrictions on payments to influence Federal Transactions, in accordance with the Byrd Amendment and implementing regulations at 49 CFR Part 24.
- (14) The MTW PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.
- (15) The MTW PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
- (16) The MTW PHA will provide HUD or the responsible entity any documentation needed to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58. Regardless of who acts as the responsible entity, the MTW PHA will maintain documentation that verifies compliance with environmental requirements pursuant to 24 Part 58 and 24 CFR Part 50 and will make this documentation available to HUD upon its request.
- (17) With respect to public housing and applicable local, non-traditional development the MTW PHA will comply with Davis-Bacon or HUD determined wage rate requirements under section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
- (18) The MTW PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.
- (19) The MTW PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.
- (20) The MTW PHA will comply with the policies, guidelines, and requirements of 2 CFR Part 225 (Cost Principles for State, Local and Indian Tribal Governments) and 2 CFR Part 200.
- (21) The MTW PHA must fulfill its responsibilities to comply with and ensure enforcement of Housing Quality Standards, as defined in 24 CFR Part 982 or as approved by HUD, for any Housing Choice Voucher units under administration.
- (22) The MTW PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the Moving to Work Agreement and Statement of Authorizations and included in its Plan.
- (23) All attachments to the Plan have been and will continue to be available at all times and all locations that the Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the MTW PHA in its Plan and will continue to be made available at least at the primary business office of the MTW PHA.

Housing Authority of Baltimore City (HABC)  
MTW PHA NAME

MD002  
MTW PHA NUMBER/HA CODE

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

Robin Carter  
NAME OF AUTHORIZED OFFICIAL

Chairperson, Board of Commissioners  
TITLE

SIGNATURE

DATE \_\_\_\_\_

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

## Appendix F: Certification of Consistency with Consolidated Plan

### To be signed after Public Comment Period

#### Certification of Consistency with the Consolidated Plan

U.S. Department of Housing and  
Urban Development

OMB Number: 2501-0044  
Expiration Date: 2/28/2027

**Public Reporting Burden Statement:** This collection of information is estimated to average 3 hours per response, including the time for reviewing instructions, searching existing data sources, gathering, and maintaining the data needed, and completing and reviewing the collection of the requested information. Comments regarding the accuracy of this burden estimate and any suggestions for reducing this burden can be sent to: U.S. Department of Housing and Urban Development, Office of the Chief Data Officer, R, 451 7th St SW, Room 8210, Washington, DC 20410-5000. Do not send completed forms to this address. This agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless the collection displays a valid OMB control number. This agency is authorized to collect this information under Section 102 of the Department of Housing and Urban Development Reform Act of 1989. The information you provide will enable HUD to carry out its responsibilities under this Act and ensure greater accountability and integrity in the provision of certain types of assistance administered by HUD. This information is required to obtain the benefit sought in the grant program. Failure to provide any required information may delay the processing of your application and may result in sanctions and penalties including of the administrative and civil money penalties specified under 24 CFR §4.38. This information will not be held confidential and may be made available to the public in accordance with the Freedom of Information Act (5 U.S.C. §552). The information contained on the form is not retrieved by a personal identifier, therefore it does not meet the threshold for a Privacy Act Statement.

I/We, the undersigned, also certify under penalty of perjury that the information provided below is true, correct, and accurate.  
Warning: Anyone who knowingly submits a false claim or makes a false statement is subject to criminal and/or civil penalties, including confinement for up to 5 years, fines, and civil and administrative penalties (18 U.S.C §§ 287, 1001, 1010, 1012, 1014; 31 U.S.C. § 3729, 3802; 24 CFR § 28.10(b)(iii)).

I/We, the undersigned, certify that the proposed activities/projects in the application are consistent with the jurisdiction's current, approved Consolidated Plan. (Complete the fields below.)

Applicant Name: Housing Authority of Baltimore City

Project Name: HABC Moving to Work Annual Plan FY 2025

Location of the Project: Baltimore, Maryland

Name of the Federal Program to which the applicant is applying:

HUD Moving to Work Annual Demonstration

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

Certifying Official of the Jurisdiction

Name:

Title:

Signature:

Date:

form HUD-2991



## Appendix G: Public Process Documentation

Copy of the Newspaper Advertisement placed in the Baltimore Sun  
August 27<sup>h</sup>, 28<sup>th</sup> and 29<sup>th</sup>, 2024

**HOUSING AUTHORITY OF BALTIMORE CITY (HABC)  
NOTICE OF 30-DAY COMMENT PERIOD FOR THE  
FY 2025 ANNUAL PLAN  
AND OTHER POLICY DOCUMENTS**

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

1. The FY 2025 Moving to Work (MTW) Annual Plan;
2. The FY 2025 Housing Choice Voucher (HCVP) Administrative Plan;
3. A Summary of Changes to the FY 2025 HCVP Administrative Plan;
4. The FY 2025 Public Housing Admission & Continued Occupancy Policies (ACOP);
5. A Summary of changes to the FY 2025 ACOP; and
6. The FY 2025 Baltimore Regional Housing Partnership (BRHP) Administrative Plan.

HABC will hold an in-person public meeting on September 24, 2024 at 4:30 p.m. in the Auditorium at Pleasant View Gardens, 201 N. Aisquith Street. The purpose of the meeting is to receive comments from interested members of the public on HABC's proposed Annual MTW Plan for fiscal year 2025, HABC's proposed 2025 HCVP Administrative Plan and proposed 2025 Public Housing ACOP and BRHP's 2025 Administrative Plan.

Printed copies of these documents will be made available for review at all HABC-owned public housing management offices and at HABC's Rental & Assisted Housing Office located at 1225 W. Pratt Street, Baltimore MD, 21223.

**The deadline to submit all comments is September 27, 2024.**

Comments on the proposed FY 2025 MTW Annual Plan, as well the proposed 2025 HCVP Administrative Plan, proposed 2025 Public Housing ACOP and proposed BRHP Administrative Plan can be submitted to HABC by:

1. Attending the public meeting at Pleasant View Gardens on September 24, 2024 and signing up on-site to make a public comment;
2. Email to Jeannine Dunn at [Jeannine.Dunn@habc.org](mailto:Jeannine.Dunn@habc.org); and/or
3. First-class mail, Attention Jeannine Dunn to:  
Housing Authority of Baltimore City  
417 E. Fayette Street – 13th Floor  
Baltimore, Maryland 21202

Baltimore Sun August 27, 28, 29 7680516

## Appendix H: Public Hearing: Comments Received on the FY 2025 Plan

HABC will hold a public meeting on September 24, 2024 to receive comments regarding the proposed 2025 MTW Plan and proposed changes to the 2025 Public Housing Admission and Continued Occupancy Policies (ACOP) and the 2025 Housing Choice Voucher Program (HCVP) Administrative Plan.

**The attendee sign-in sheet for this meeting and comments will be included in the final Plan.**



**Attendees at Public Hearing: 2025 MTW Plan  
September 24, 2024**

**Attendance Sheets to be attached after the Public Hearing**

## Appendix I: Written Comments on the FY 2025 Annual Plan

Comments to be included after the Public Comment Period

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

To be signed after Public Comment period

NOT APPLICABLE

### DISCLOSURE OF LOBBYING ACTIVITIES

Complete this form to disclose lobbying activities pursuant to 31 U.S.C.1352

OMB Number: 4040-0013  
Expiration Date: 02/28/2025

<b>1. * Type of Federal Action:</b> <input type="checkbox"/> a. contract <input checked="" type="checkbox"/> b. grant <input type="checkbox"/> c. cooperative agreement <input type="checkbox"/> d. loan <input type="checkbox"/> e. loan guarantee <input type="checkbox"/> f. loan insurance	<b>2. * Status of Federal Action:</b> <input type="checkbox"/> a. bid/offer/application <input checked="" type="checkbox"/> b. initial award <input type="checkbox"/> c. post-award	<b>3. * Report Type:</b> <input checked="" type="checkbox"/> a. initial filing <input type="checkbox"/> b. material change
<b>4. Name and Address of Reporting Entity:</b> <input checked="" type="checkbox"/> Prime <input type="checkbox"/> SubAwardee * Name [REDACTED] * Street 1 [REDACTED] Street 2 [REDACTED] * City [REDACTED] State [REDACTED] Zip [REDACTED] Congressional District, if known: [REDACTED]		
<b>5. If Reporting Entity in No.4 is Subawardee, Enter Name and Address of Prime:</b> [REDACTED]		
<b>6. * Federal Department/Agency:</b> [REDACTED]	<b>7. * Federal Program Name/Description:</b> [REDACTED] CFDA Number, if applicable: [REDACTED]	
<b>8. Federal Action Number, if known:</b> [REDACTED]	<b>9. Award Amount, if known:</b> \$ [REDACTED]	
<b>10. a. Name and Address of Lobbying Registrant:</b> Prefix [REDACTED] * First Name [REDACTED] Middle Name [REDACTED] * Last Name [REDACTED] Suffix [REDACTED] * Street 1 [REDACTED] Street 2 [REDACTED] * City [REDACTED] State [REDACTED] Zip [REDACTED]		
<b>b. Individual Performing Services</b> (including address if different from No. 10a) Prefix [REDACTED] * First Name [REDACTED] Middle Name [REDACTED] * Last Name [REDACTED] Suffix [REDACTED] * Street 1 [REDACTED] Street 2 [REDACTED] * City [REDACTED] State [REDACTED] Zip [REDACTED]		
<b>11.</b> Information requested through this form is authorized by title 31 U.S.C. section 1352. This disclosure of lobbying activities is a material representation of fact upon which reliance was placed by the tier above when the transaction was made or entered into. This disclosure is required pursuant to 31 U.S.C. 1352. This information will be reported to the Congress semi-annually and will be available for public inspection. Any person who fails to file the required disclosure shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure. <b>* Signature:</b> Completed on submission to Grants.gov <b>* Name:</b> Prefix [REDACTED] * First Name Janet Middle Name [REDACTED] * Last Name Abrahams Suffix [REDACTED] <b>Title:</b> President & CEO <b>Telephone No.:</b> 410-396-5504 <b>Date:</b> Completed on submission to Grants.gov		
<b>Federal Use Only:</b>		Authorized for Local Reproduction Standard Form - LLL (Rev. 7-87)

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

To be signed after Public Comment period

Certification of Payments to Influence Federal Transactions		U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB Approval No. 2577-0157 (Exp. 1/31/2027)
<small>Public reporting burden for this information collection is estimated to average 30 minutes, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. The information requested is required to obtain a benefit. This form is used to ensure federal funds are not used to influence members of Congress. There are no assurances of confidentiality. HUD may not conduct or sponsor, and an applicant is not required to respond to a collection of information unless it displays a currently valid OMB control number. Comments regarding the accuracy of this burden estimate and any suggestions for reducing this burden can be sent to the Reports Management Officer, Office of Policy Development and Research, REE, Department of Housing and Urban Development, 451 7th St SW, Room 4176, Washington, DC 20410-5000. When providing comments, please refer to OMB Approval No. 2577-0157.</small>			
Applicant Name			
Housing Authority of Baltimore City Moving to Work Program			
Program/Activity Receiving Federal Grant Funding			
Janet Abrahams			
The undersigned certifies, to the best of his or her knowledge and belief, that:			
<p>(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.</p> <p>(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, Disclosure Form to Report Lobbying, in accordance with its instructions.</p>		<p>(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all sub recipients shall certify and disclose accordingly.</p> <p>This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by Section 1352, Title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.</p>	
I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. <b>Warning:</b> HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)			
Name of Authorized Official		Title	
Janet Abrahams		President & Chief Executive Officer	
Signature		Date (mm/dd/yyyy)	
Previous edition is obsolete		form HUD 50071 (01/14)	

## Appendix L: RAD Significant Amendments

### New RAD Significant Amendment

Name of Public Housing Development	PIC Development ID	Conversion Type	Transfer of Assistance
Reservoir Hill 2	MD002117	RAD PBV or RAD/Section 18 Blend of PBV & Tenant Protection Voucher	None
Pre-Conversion Total Units	Pre-RAD Unit Type	Post-RAD Unit Type	Capital Fund Allocation
40	Family	Family	\$82,238
Bedroom Type	Number of Pre-RAD Units	Number of Post-RAD Units	Changes in Units and Why
Studio			
1-Bedroom	12	12	None
2-Bedroom	9	9	None
3-Bedroom	13	13	None
4-Bedroom	5	5	None
5-Bedroom	1	1	None
6-Bedroom			
<b>Transfer of Assistance:</b>	No		

## New RAD Significant Amendment

Name of Public Housing Development	PIC Development ID	Conversion Type	Transfer of Assistance
Sharp Leadenhall	MD002119	RAD PBV or RAD/Section 18 Blend of PBV & Tenant Protection Voucher	None
Pre-Conversion Total Units	Pre-RAD Unit Type	Post-RAD Unit Type	Capital Fund Allocation
23	Family	Family	\$50,990
Bedroom Type	Number of Pre-RAD Units	Number of Post-RAD Units	Changes in Units and Why
Studio			
1-Bedroom	3	3	None
2-Bedroom	5	5	None
3-Bedroom	4	4	None
4-Bedroom	10	10	None
5-Bedroom	1	1	None
6-Bedroom			
<b>Transfer of Assistance:</b>	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.